

Rep No.	First Name	Surname	Organisation	3. Main / Minor	3. Mod No.	6. Reasons for Plan not being Legally Compliant or Sound	7. Changes suggested by representor to make the Plan legally compliant or sound	8. Reasons for Plan being legally compliant or sound	10. Comments on Updated SA	General Comments
137/2	Theresa	Goss	Adderbury Parish Council	Main	1	Use of the term "urban- rural fringe" is inappropriate use of English to hide the buffer zone reduction between Banbury and Twyford. The buffer zone will no longer avoid coalescence. Reference is made to an appeal decision at Hurstpierpoint ref 13/01250/FUL relating to coalescence.				
144/1	Theresa	Goss	Bloxham Parish Council	Main	1	The term urban fringe dilutes the effectiveness of the earlier green buffer zone that would have been a clearly recognisable feature. The original term clearly showed the will to prevent coalescence of villages with towns. The proposed change indicates that there is an acceptance of the creep of dwellings into the clear demarcation of town and country.	Revert to a feature that is recognisable to prevent coalescence of towns into villages and villages into each other. A green field barrier between villages.			
302/1	David	Jackson	Savills	Main	1			Supported, insofar as additional employment allocation is identified at Banbury on land north east of Junction 11 of the M40. Given the very significant increase in the scale of housing allocations at Banbury, additional employment allocation for the town has been made even more compelling.	Welcome the analysis of the site contained in the SA Addendum. The SA identifies one significant adverse effect of the allocation and that is in relation to the loss of greenfield land. This is however an inevitable consequence of providing additional land for development at Banbury, given the lack of brownfield alternatives. The other adverse effects are assessed in the SA as being minor and are not considered to outweigh the benefits of allocating the site.	
302/2	David	Jackson	Savills	Main	2			Supported, insofar as additional employment allocation is identified at Banbury on land north east of Junction 11 of the M40. Given the very significant increase in the scale of housing allocations at Banbury, additional employment allocation for the town has been made even more compelling.	Welcome the analysis of the site contained in the SA Addendum. The SA identifies one significant adverse effect of the allocation and that is in relation to the loss of greenfield land. This is however an inevitable consequence of providing additional land for development at Banbury, given the lack of brownfield alternatives. The other adverse effects are assessed in the SA as being minor and are not considered to outweigh the benefits of allocating the site.	
210/1	Adrian	Gould	JPPC / Bicester Heritage Ltd	Main	2	It is considered that the increased allocation of employment land at North East Bicester has not been justified in that due regard has not been given to the potential to allocate a proportion of the additional employment land to the former RAF Bicester, where land for such purposes is both suitable and available.	The Technical Site and Flying Field should be allocated as a strategic employment site which is suitable for meeting some of the increased demand for B1 and B8 purposes that has been identified for this area of Bicester.		No comment	
259/1	Paul	Burrell	Pegasus Group / The Dorchester Group	Main	2	No increase in employment provision at Former RAF Upper Heyford is proposed despite a substantial increase in housing. The plan therefore fails to respond positively to the opportunities that exist at the site and foster a sustainable pattern of development. This is inconsistent with the aspirations of the plan and the objectives of the NPPF. Aspirations for an optimum balance between homes and jobs is not achieved at the site. Correspondence from existing tenants illustrates that the site is an excellent location for employment and that demand is being unnecessarily constrained by the lack of room for expansion.	The modification is considered to be inconsistent with the economic aspirations of the local plan and cannot be considered to be positively prepared without further consideration of the opportunities to provide additional employment land at the Former RAF Upper Heyford site. Revisions are required (in parallel with changes sought to modification 157) to enable appropriate additional employment at the site. This could be considered as part of a wider strategic review of development opportunities at the site to ensure that the Local Plan as currently drafted does not act as a barrier to the delivery of suitable employment land. As part of the development of an employment hub at Heyford there is capacity to provide for a significant increase in employment floorspace for a variety of types and needs. The overall objective should be to increase the number of jobs on the basis of a ratio of 1 job: 1 household on the site by providing for at least 100,000 sq m of employment space in addition to that already consented.			The submission is accompanied by letters from existing tenants (Integration Technology, Oxford Innovation, Paragon Automotive Group, Parkers European, Restore Document Management, Oxford Technical Solutions and Draks Interior Door Solutions Ltd) and local agents (Lambert Smith Hampton).

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302/2	David	Jackson	Savills	Main	2			Supported, insofar as additional employment allocation is identified at Banbury on land north east of Junction 11 of the M40. Given the very significant increase in the scale of housing allocations at Banbury, additional employment allocation for the town has been made even more compelling.	Welcome the analysis of the site contained in the SA Addendum. The SA identifies one significant adverse effect of the allocation and that is in relation to the loss of greenfield land. This is however an inevitable consequence of providing additional land for development at Banbury, given the lack of brownfield alternatives. The other adverse effects are assessed in the SA as being minor and are not considered to outweigh the benefits of allocating the site.	
047/2	Matthew	Coyne	Banbury Town Council	Main	3					Questions the need to increase delivery of housing in Banbury to 7319 homes.
144/2	Theresa	Goss	Bloxham Parish Council	Main	3	The 2014 SHMA has not been subject to scrutiny and consultation. Its findings have already been called into question by CPRE. The SHMA itself provided caveats that the projection needed to be reviewed over the life of the plan. The problem is that developers will seize this overarching figure to push for unsuitable development in easy rural areas in the short term. Experience shows that little or no reliance can be placed on the matter being viewed objectively at an Inquiry.	The SHMA needs to be subject to an objective scrutiny. The Local Plan needs to breakdown the overall figure into realistic projections of say 5 to 10 years. This would avoid the unnecessary building of dwellings in villages that are then made unsustainable.			
158/1	Simon	Greenwood	Savills / New College	Main	3	New College as owner of land within the allocation and adjoining the proposal welcomes the proposals to identify Former RAF Upper Heyford as a strategic site for a new settlement in the rural areas. The Upper Heyford Assessment Interim Final Report and The Landscape Sensitivity and Capacity Assessment are welcomed. Given significant scale of the developed proposed for the former RAF Upper Heyford site (2,361 dwellings) the allocation should be included in the summary at table 4	Inclusion of the Former RAF Upper Heyford allocation in the summary table of proposed housing numbers to provide a complete picture of the housing delivery and in particular to ensure the importance of the allocation and its potential for further longer term provision to be viewed as part of the overall strategic housing allocations. Apart from North West Bicester it is the largest allocation in the District and has scope for significant future expansion.		Comments reflected in the opportunity to create a new settlement at Former Upper Heyford which will provide a comprehensive community if planned as a whole even if part of the proposals would be developed after the plan period.	
164/15	Sarah	Smith	Rapleys LLP / Pandora Trading Ltd	Main	3			The overall housing figures proposed in the Modifications are generally supported, in the context that the proposed increase does now meet the objectively assessed needs of the District. The proposed increase in overall housing numbers is to be managed through the distribution strategy as originally proposed, i.e., concentration of development at Banbury and Bicester with limited increase within the remainder of the district. This is also supported.	Not in relation to these particular modifications. Comments are provided in respect of the Sustainability Appraisal under separate representation.	
166/49	Helen	Marshall	CPRE Oxfordshire	Main	3	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			

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191/1	Michael	Robson	Cerda Planning Ltd / CALA Homes (Midlands) Ltd	Main	3					The housing figure proposed makes no allowance for the housing needs of Oxford therefore not meeting the full objectively assessed need. Concerned that the evidence from the SHMA in respect of meeting Oxford's housing needs have not been taken forward in the Main Modifications. It is expected that the Council will need to accommodate some of Oxford's unmet housing needs. New sites must be found, as such as land at Bicester, Deddington and Bloxham. The trajectory allows for no flexibility in meeting the housing figure. If any larger sites falls behind that indicated in the trajectory, or any of the identified sites do not come forward the housing figure will not be fulfilled. New settlements and large urban extensions could face deliverability challenges. Large strategic housing schemes will experience long lead-in times so they are not a short term or quick solution to housing land supply. This is usually as a result of new or major upgrades to surrounding infrastructure. Future rates of delivery will need to be realistic by considering the type of scheme, number of developers and how quickly developers can sell the homes built.
207/1	Jacqueline	Mulliner	Terence O'Rourke Ltd / Blenheim Palace Estate	Main	3	Object to the restrained approach taken to Kidlington and consider that there is far greater capacity at the settlement for mixed-use development. Kidlington is the third largest settlement in the district. Kidlington benefits from its strategic location. The area is well linked in transport terms, strategic road network is being upgraded, new railway station, linkages with the science/technology industry and has significant economic growth potential. The economic potential was made clear in the Cherwell Economic Analysis Addendum. The study identifies 4,282 forecast jobs for Kidlington yet zero dwellings. This raises concern. The Plan fails to offer an effective approach to mixed-use development; provide a joint approach to the provision of housing and employment; respond to the evidence base and potential for growth; acknowledge the lack of harm likely to result from development in the Kidlington/Begbroke area; and respond to the opportunities presented by Oxford and the unmet need arising there. The Sustainability Appraisal provides no justification for the revised distribution and no assessment of the impact of the increased mismatch between housing and employment provisions at Kidlington/Begbroke. The Green Belt review around Kidlington is sought to be undertaken through the Local Plan 2 but the policy should provide a clear indication of expectations in order to be effective in complying with the NPPF.	Increase housing provision for the rural areas (including Kidlington) to 6,400 dwellings. Require at least 1,000 dwellings to be accommodated at Kidlington, through Green Belt review.			
229/1	Nik	Lyzba	JPPC / The Tripartite (Oxford University, Merton College and R.Smith)	Main	3				The SA should have considered the potential for development in the green belt at this stage and as a reasonable alternative to other development options.	Provision in order to meet Cherwell's objectively assessed housing need takes no account of needs which are likely to arise from Oxford City. Reference should be included in the Executive summary for a review in order to meet Oxford's needs. The proposed distribution of housing does not take into account the reasonable alternative of new housing development in the green belt, other than a limited potential review around Kidlington.
253/1	Michael	Lowndes	Turley / P3Eco Group	Main	3	Supports the principle of the increase in new homes at North West Bicester from 5,000 – 6,000. But the upper limit is arbitrary and the site is capable of delivering a greater number of homes. Not clear upon what evidence the figures have been founded. The North West Bicester Masterplan (May 2014) does not yet specify a phasing, implementation or delivery schedule which is subject to agreement with the P3Eco Group and all other interested parties. The SHLAA Update 2014 is based on A2Dominion's land interests only.	There should be no restriction on the amount of housing that can come forward during the Local Plan period at NW Bicester. In Main Modification 3 the last sentence of the first paragraph should be amended to reflect the above: <u>The delivery of homes at North West Bicester Eco Town (Bicester 1) will be the subject of a Phasing and Implementation Brief.</u>			
259/12	Paul	Burrell	Pegasus Group / The Dorchester Group	Main	3			This modification provides an appropriate response to the conclusions of the Oxfordshire SHMA, recognising the need to meet in full the objectively assessed housing needs for the District.		

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061/1	Alan	Lodwick		Main	3	Objects to the use of the SHMA figures to inform the Local Plan.	All Modifications relating to the SHMA should be deleted.			
179/3	Matthew	Bates	Oxford City Council	Main	3	There remains in the Submission Cherwell Local Plan no provision for any of Oxford's unmet housing need, despite there being indisputable evidence that the City's needs cannot be met within its own administrative boundaries. This is contrary to the legal Duty to Cooperate and a key requirement of the NPPF, and renders the Plan unsound. The Inspector and participants at the last hearing sessions broadly agreed that providing for some of the Oxford need in Cherwell was inevitable.	Add the following paragraph: <u>An Oxfordshire wide Strategic Housing Market Assessment (SHMA) was published in March 2014, which showed very significant unmet housing needs across the whole of the housing market area of Oxfordshire. As well as identifying a higher level of need in Cherwell than previously planned for, Oxford City has unmet housing need of between 24,000 and 32,000, only a proportion of which can be met within its own boundaries. Under the Duty to Cooperate, neighbouring Councils must plan across administrative boundaries to meet all unmet housing need. Therefore, Policy PSD2 of this Plan commits to an early review of the Cherwell Local Plan. This will include an assessment of whether the Green Belt boundary around Oxford should be reviewed to ensure the wider housing needs of the area can be met in a sustainable way.</u>			
167/01	Colin	Cockshaw	BAEcon	Main	3	The housing growth proposed at Bicester is inappropriate to the scale of the town. Existing infrastructure is inadequate to cater for large scale growth and the plan contains no clear indication that the deficiencies are likely to be adequately remedied within the Plan period. In particular both the highway network within and serving the town and the facilities available would need radical change and there are no proposals in the plan to achieve this. While the plan seeks to increase and broaden local employment opportunities, it is likely that a great deal of present and future housing demand will continue to come from people who will work outside the Bicester area, including Oxford and South Oxfordshire science based employment. Historically the Bicester area has proved attractive to workers from these areas because house prices have been somewhat lower and the available evidence indicates that this is likely to continue, especially if Bicester becomes the main focus of new housing in the area. The plan does not respond adequately to the likelihood of continuing large-scale commuting to work.	In view of the case made above, the most effective and sustainable strategy would be to respond to demand by locating a substantial part of proposed new housing closer to Oxford (and even perhaps in locations outside the District). This would ease the overload on A41/A34, Junction 9 of M40 and the M40 itself.			
047/3	Matthew	Coyne	Banbury Town Council	Main	4					Questions the need to increase delivery of housing in Banbury to 7319 homes.
167/01	Colin	Cockshaw	BAEcon	Main	4	The housing growth proposed at Bicester is inappropriate to the scale of the town. Existing infrastructure is inadequate to cater for large scale growth and the plan contains no clear indication that the deficiencies are likely to be adequately remedied within the Plan period. In particular both the highway network within and serving the town and the facilities available would need radical change and there are no proposals in the plan to achieve this. While the plan seeks to increase and broaden local employment opportunities, it is likely that a great deal of present and future housing demand will continue to come from people who will work outside the Bicester area, including Oxford and South Oxfordshire science based employment. Historically the Bicester area has proved attractive to workers from these areas because house prices have been somewhat lower and the available evidence indicates that this is likely to continue, especially if Bicester becomes the main focus of new housing in the area. The plan does not respond adequately to the likelihood of continuing large-scale commuting to work.	In view of the case made above, the most effective and sustainable strategy would be to respond to demand by locating a substantial part of proposed new housing closer to Oxford (and even perhaps in locations outside the District). This would ease the overload on A41/A34, Junction 9 of M40 and the M40 itself.			
144/3	Theresa	Goss	Bloxham Parish Council	Main	4	No proven demand for this allocation of homes in the CDC area and specifically no apparent proven demand in the North of the district. There does not appear to have been a robust examination of both market and economic signals to justify the Rural Allocation that includes both Upper Heyford and Kidlington.	Removal of both Upper Heyford and Kidlington into their own category.			
151/1	Jan	Molyneux	Stephen Bowley Planning Consultancy / Shipton Ltd	Main	4	Should allow for significant development north of Kidlington to provide for unmet demand within Oxford under duty to cooperate and as a result of the SHMA.	The potential for development at Shipton on Cherwell Quarry should be considered as a result of the SHLAA (location plan provided)			

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191/2	Michael	Robson	Cerda Planning Ltd / CALA Homes (Midlands) Ltd	Main	4					Growth at larger centres can assist in meeting a number of sustainability principles but it must not be at the expense of the larger sustainable villages which provide an important network across Cherwell. Housing should be directed to locations where housing need is generated. The Taylor Review sets out important context to the issue of delivering development in sustainable rural locations. Housing cannot be delivered in Banbury at the rate required to meet housing needs. The Council have a history of failing to meet its housing targets. Over the period 2008-2013 the Council delivered on average 398 dwellings per annum and only 340 dwellings were delivered in 2012-13. The evidence points to the need for the Plan to look again at the distribution of housing, increase the housing numbers to provide choice and competition in the market and ensure that sufficient allocations are made particularly at Bicester and in the sustainable villages to ensure that the housing trajectory can genuinely be achieved.
207/2	Jacqueline	Mulliner	Terence O'Rourke Ltd / Blenheim Palace Estate	Main	4	Object to the restrained approach taken to Kidlington and consider that there is far greater capacity at the settlement for mixed-use development. Kidlington is the third largest settlement in the district. Kidlington benefits from its strategic location. The area is well linked in transport terms, strategic road network is being upgraded, new railway station, linkages with the science/technology industry and has significant economic growth potential. The economic potential was made clear in the Cherwell Economic Analysis Addendum. The study identifies 4,282 forecast jobs for Kidlington yet zero dwellings. This raises concern. The Plan fails to offer an effective approach to mixed-use development; provide a joint approach to the provision of housing and employment; respond to the evidence base and potential for growth; acknowledge the lack of harm likely to result from development in the Kidlington/Begbroke area; and respond to the opportunities presented by Oxford and the unmet need arising there. The Sustainability Appraisal provides no justification for the revised distribution and no assessment of the impact of the increased mismatch between housing and employment provisions at Kidlington/Begbroke. The Green Belt review around Kidlington is sought to be undertaken through the Local Plan 2 but the policy should provide a clear indication of expectations in order to be effective in complying with the NPPF.	Increase housing provision for the rural areas (including Kidlington) to 6,400 dwellings. Require at least 1,000 dwellings to be accommodated at Kidlington, through Green Belt review.			
229/2	Nik	Lyzba	JPPC / The Tripartite (Oxford University, Merton College and R.Smith)	Main	4				The SA should have considered the potential for development in the green belt at this stage and as a reasonable alternative to other development options.	Provision in order to meet Cherwell's objectively assessed housing need takes no account of needs which are likely to arise from Oxford City. Reference should be included in the Executive summary for a review in order to meet Oxford's needs. The proposed distribution of housing does not take into account the reasonable alternative of new housing development in the green belt, other than a limited potential review around Kidlington.
229/3	Nik	Lyzba	JPPC / The Tripartite (Oxford University, Merton College and R.Smith)	Main	5				The SA should have considered the potential for development in the green belt at this stage and as a reasonable alternative to other development options.	Provision in order to meet Cherwell's objectively assessed housing need takes no account of needs which are likely to arise from Oxford City. Reference should be included in the Executive summary for a review in order to meet Oxford's needs. The proposed distribution of housing does not take into account the reasonable alternative of new housing development in the green belt, other than a limited potential review around Kidlington.
229/4	Nik	Lyzba	JPPC / The Tripartite (Oxford University, Merton College and R.Smith)	Main	5				The SA should have considered the potential for development in the green belt at this stage and as a reasonable alternative to other development options.	Provision in order to meet Cherwell's objectively assessed housing need takes no account of needs which are likely to arise from Oxford City. Reference should be included in the Executive summary for a review in order to meet Oxford's needs. The proposed distribution of housing does not take into account the reasonable alternative of new housing development in the green belt, other than a limited potential review around Kidlington.

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253/2	Michael	Lowndes	Turley / P3Eco Group	Main	5	Supports the principle of the increase in new homes at North West Bicester from 5,000 – 6,000. But the upper limit is arbitrary and the site is capable of delivering a greater number of homes. Not clear upon what evidence the figures have been founded. The North West Bicester Masterplan (May 2014) does not yet specify a phasing, implementation or delivery schedule which is subject to agreement with the P3Eco Group and all other interested parties. The SHLAA Update 2014 is based on A2Dominion's land interests only.	There should be no restriction on the amount of housing that can come forward during the Local Plan period at NW Bicester			
216	Jason	Hill	Savills / Trinity College, Oxford	Main	6			An additional area of land as shown in blue on the attached plan is available for development and for inclusion in the Local Plan. Initial appraisals of the site could be suitable for a higher number therefore the number of homes could be increased for this site. Additional land to the south could be included if required. This additional land could potentially be included to form a green buffer between the settlements.		
219	Jason	Hill	Savills / Trinity College, Oxford	Main	6	Site - Land adjoining Dover Avenue and Thornbury Drive (SHLAA BA371) should be included as an extension to the land West of Bretch Hill (Banbury 3). The site would provide a suitable extension. Proposals for the site are at an early stage and could be brought forward following consultation with the Council in a way which respects the constraints of the site via strong design and a reduced density of housing.	Site - Land adjoining Dover Avenue and Thornbury Drive (SHLAA BA371) should be included as an extension to the previously proposed development on land to the West of Bretch Hill.			
237	Simon	Barry	Boyer Planning / Bloor Homes and Trinity College	Main	6	Omission of land adjoining Dover Avenue and Thornbury Drive, Banbury t from the housing allocations results in the Deposit Local Development Plan being unsound in terms of the first test contained within Paragraph 182 of the National Planning Policy Framework, which states that the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements.	Site - Land adjoining Dover Avenue and Thornbury Drive, Banbury should be allocated for residential development		To accompany the representation is an updated Sustainability Assessment for the site (Ref: BA343). The Council Appraisal has not sufficiently considered its relationship with the allocation Banbury 3 to the north. It is suggested I that there is no capacity for formal recreation facilities on site. The potential provision of formal areas of open space and an expansion of the existing allotments off Dover Avenue are clearly illustrated however by the illustrative masterplan. Furthermore, an element of formal play equipment and additional amenity space will be provided in the linked development to the north.	Site - land adjoining Dover Avenue and Thornbury Drive exhibits a number of positive elements in planning terms that support its inclusion within the Local Plan as a Strategic Allocation (150-200 dwellings). It forms a logical extension to the approved scheme to the north, Banbury 3 Allocation - West of Bretch Hill and would rationalise the western urban fringe of Banbury in the context of the local topography and extent of existing development. Additional development in this location would also further contribute towards the renewal objectives of the Bretch Hill Regeneration Area (Banbury 10). This site can come forward quickly with the developer already in collaboration with the landowner on the West of Bretch Hill site. The housing trajectory shows that there are a number of large sites that are projected to be delivered by 2019. Based on a cautious and pragmatic approach, this is unlikely to be achieved. The LPA cannot currently demonstrate a 5 year housing land supply and a quick release of the land adjoining Dover Avenue and Thornbury Drive, Banbury site would contribute to meeting it.
238	James	Hill	Adalta Real PLC / John Phipps	Main	6	The Council's reasoning for identifying and rejecting new residential site allocations is unsound and land at the Plain, Caversfield, Bicester should be included as a residential site allocation on the basis that it has not been assessed as a stand alone site but as part of a wider site and as a result the justification for the rejection does not apply specifically to this site. Landscape sensitivity of the site (rather than the enlarged area assessed) is considered low, visual sensitivity is low and can be further mitigated. It he site has high landscape capacity, particularly for residential development. Overall landscape sensitivity of the site is low and landscape value low. An appropriately designed scheme would not present a risk to coalescence between Bicester and Caversfield and location relative to other allocated sites and developments ensue that it can be appropriately integrated with the rest of Bicester. The assessment process is flawed as the site has not been properly and objectively assessed.	There is no justifiable reason for 'The Plain', Caversfield t to be excluded and the reasoning for exclusion within the SHLAA update are unsound and cannot be justified.		No comment	

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164/4	Sarah	Smith	Rapleys LLP / Pandora Trading Ltd	Main	6	Through the allocation of Banbury 16,17 and 18 and their removal from the green buffer it is clear that: 1. Areas of attractive countryside which form the setting to Banbury (as evidenced in Inquiry Core Document ENV03) are now proposed for development; 2. Ridgelines containing the town (as evidenced in ENV03) are now proposed to be breached by development, notably Banbury 18; 3. Areas which fulfilled the green buffer criteria (evidenced in ENV04) are now proposed for development despite the adverse impacts on setting and coalescence; 4. There is a lack of consistency and transparency in the approach which has been taken. For example, Banbury 16 and Banbury 17 would reduce the gap between Banbury and Bodicote to 200m, whereas the extension of the green buffer over Banbury 2 would result in a separation of over 1,000m between Banbury and Hanwell; 5. The green buffer evidence base has clearly been set aside; 6. CDC has been very selective in terms of its use of and reliance on all of the landscape related evidence base.	The allocations of Banbury 16,17,and 18 should be deleted and the green buffer designation should be re-instated across their extent.		Not in respect of these stated modifications. Comments are provided on the Sustainability Appraisal in a separate representation.	Concerns over the sustainability and, importantly, the deliverability of Banbury 16, 17 and 18 raises serious questions about the robustness of the allocation of these particular sites.
191/3	Michael	Robson	Cerda Planning Ltd / CALA Homes (Midlands) Ltd	Main	6		Land at Fringford Road, Bicester should be allocated for approximately 100 dwellings.			Site - Land at Fringford Road, Bicester. The table does not allocate a strategic housing site at Fringford Road, to the north west of Bicester. The site should be allocated for approximately 100 houses. The site, being on the edge of Bicester, is a sustainable location with access to a range of services and facilities including schools. The site is the subject of a previous appeal decision for residential development on the site, dismissed by the Inspector. The site should be reassessed afresh as part of the plan making process, and particularly in the context of housing needs identified in the SHMA.
197/1	David	Keene	David Lock Associates / Gallagher Estates	Main	6		The inclusion of land at Gavray Drive to deliver 300 dwellings is strongly supported as a robust allocation to secure timely delivery of dwellings to meet the housing needs at Bicester and the wider district. However, the table should be amended to refer to these housing numbers as "indicative" figures. Until detailed site investigations and masterplanning is complete site capacity is unknown.	Support the modifications to the Proposed Strategic Housing Allocations as set out at Table 4 and consider they appropriately respond to the level of housing need identified in the 2014 Oxfordshire Strategic Housing Market Assessment and demonstrates an acceptable approach to the level of housing provision for the period to 2031. The inclusion of land at Gavray Drive to deliver 300 dwellings is strongly supported as a robust allocation to secure timely delivery of dwellings to meet the housing needs at Bicester and the wider district. However, the table should be amended to refer to these housing numbers as "indicative" figures. Until detailed site investigations and masterplanning is complete site capacity is unknown.	Support the conclusions of the SA addendum that reports land at Gavray Drive to deliver development to help meet the housing needs identified by the 2014 County SHMA. Gallagher Estates is preparing two planning applications for the site – Gavray Drive East and Gavray Drive West defined by the Langford Brook. These will be submitted shortly, and will be supported by Environmental Statements that demonstrate all likely impacts that may arise from development can be adequately and appropriately mitigated to ensure that no significant adverse impacts would result from development of the site and would in fact result in a number of beneficial effects.	
217/1	Nick	Freer	David Lock Associates / Gallagher Estates and John Colegrave	Main	6			Generally supports the proposed strategic housing allocations in Table 4 which appropriately responds to the level of housing identified in the SHMA. The inclusion of land at Wykham Park Farm to deliver a substantial part of the South of Salt Way allocation for 1345 dwellings is strongly supported.	Support the conclusions of the SA Addendum that reports land at Wykham Park Farm to be a reasonable alternative to deliver strategic development to help meet the housing needs identified in the SHMA. A planning application is currently being prepared and will be supported by an Environmental Statement that demonstrates all likely impacts that may arise from development at the site can be adequately and appropriately mitigated to ensure that no significant adverse impacts would result from development of the site. There will be beneficial effects such as delivery of housing, provision of education and community benefits to assist in the creation of a sustainable and vibrant community.	

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229/5	Nik	Lyzba	JPPC / The Tripartite (Oxford University, Merton College and R.Smith)	Main	6				The SA should have considered the potential for development in the green belt at this stage and as a reasonable alternative to other development options.	Provision in order to meet Cherwell's objectively assessed housing need takes no account of needs which are likely to arise from Oxford City. Reference should be included in the Executive summary for a review in order to meet Oxford's needs. The proposed distribution of housing does not take into account the reasonable alternative of new housing development in the green belt, other than a limited potential review around Kidlington.
251/2	Heather	Vickers	Planning Potential / Gleeson Developments Ltd	Main	6	Additional Proposed Strategic Housing Allocations required to meet the full objectively assessed housing need. Current allocations based on insufficient evidence. Landscape work has been selective. Site selection should have been based on the SA. Lack of justification for Council's five year housing land supply.	Include an additional allocation with Banbury - Land North East of Crouch Hill Farm Adjoining Broughton Road – 117 homes – Banbury 20.			
253/3	Michael	Lowndes	Turley / P3Eco Group	Main	6	Supports the principle of the increase in new homes at North West Bicester from 5,000 – 6,000. But the upper limit is arbitrary and the site is capable of delivering a greater number of homes. Not clear upon what evidence the figures have been founded. The North West Bicester Masterplan (May 2014) does not yet specify a phasing, implementation or delivery schedule which is subject to agreement with the P3Eco Group and all other interested parties. The SHLAA Update 2014 is based on A2Dominion's land interests only.	There should be no restriction on the amount of housing that can come forward during the Local Plan period at NW Bicester.			
258/6	Craig	Barnes	Gladman Developments	Main	6					The strategy continues to focus at the urban settlements of Bicester and Banbury, and a new settlement at RAF Upper Heyford. There is a lack of recognition given by the strategy towards the needs of the rural areas. The Council should provide a greater understanding of housing needs in the rural areas. The 2014 SHLAA Update highlights that there is potential for extra 2,643 dwellings in the rural area, on sites outside settlement boundaries in addition to those built out since the start of the plan period and those with planning permission.
199/1	Huw	Mellor	Kemp & Kemp / Mano Oak Homes	Main	7			Supports the requirement of further development in the rural areas and the acknowledgement of increased housing targets, as identified in the Oxfordshire SHMA.		
151/2	Jan	Molyneux	Stephen Bowley Planning Consultancy / Shipton Ltd	Main	7	The 2014 SHMA has identified a need for substantial housing provision within the Kidlington area of the district.	Would be appropriate to make a strategic allocation.			
158/2	Simon	Greenwood	Savills / New College	Main	7	New College as owner of land within the allocation and adjoining the proposal welcomes the proposals to identify Former RAF Upper Heyford as a strategic site for a new settlement in the rural areas. The Upper Heyford Assessment Interim Final Report and The Landscape Sensitivity and Capacity Assessment are welcomed. However given the significant existing development on site and the identified proposals to expand the allocation to over 2000 dwellings and more plus extensive employment land and community facilities is not properly reflected in a set of policies which identify the opportunity as part of the "Villages and Rural Areas" suite of policies. Clear and distinct policies specific to the location should be set out. They should identify the full extent of the potential new settlement that is emerging and is identified in the policies and should look to present the long terms vision rather than just the initial elements identified in the proposals.	A suite of policies based on the ones identified in the plan to provide 1,600 plus the extant 761 dwellings and appropriate employment and community policies together with identification of the overall potential of the location to develop a new settlement (see plan at figure L02 in the Upper Heyford Landscape Sensitivity and Capacity Assessment "Former RAF Upper Heyford site extension site landscape. The policies should identify this reserve capacity so that the initial infrastructure can be provided with a view to meeting the full extent of the new settlement.		Comments reflected in the opportunity to create a new settlement at Former Upper Heyford which will provide a comprehensive community if planned as a whole even if part of the proposals would be developed after the plan period.	
198/1	Huw	Mellor	Kemp & Kemp / Newcore Capital Management	Main	7					Supports the requirement of further development in the rural areas and the acknowledgement of increased housing targets, as identified in the Oxfordshire SHMA.
225/1	Lorna and Ian	James		Main	7					Object to the proposed addition of 1,000 homes at North West Bicester due to the increased traffic impact.

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225/2	Lorna and Ian	James		Main	7					Objects to the proposed addition of 1,000 homes at North West Bicester as the increased density will mean less garden land and green space, with families crammed together.
229/6	Nik	Lyzba	JPPC / The Tripartite (Oxford University, Merton College and R.Smith)	Main	7				The SA should have considered the potential for development in the green belt at this stage and as a reasonable alternative to other development options.	Provision in order to meet Cherwell's objectively assessed housing need takes no account of needs which are likely to arise from Oxford City. Reference should be included in the Executive summary for a review in order to meet Oxford's needs. The proposed distribution of housing does not take into account the reasonable alternative of new housing development in the green belt, other than a limited potential review around Kidlington.
259/13	Paul	Burrell	Pegasus Group / The Dorchester Group	Main	7			The modification recognises the important contribution provided by Former RAF Upper Heyford in meeting the additional housing needs of the District, and the recognition that it continues to be a strategic site.		
229/7	Nik	Lyzba	JPPC / The Tripartite (Oxford University, Merton College and R.Smith)	Main	8				The SA should have considered the potential for development in the green belt at this stage and as a reasonable alternative to other development options.	Provision in order to meet Cherwell's objectively assessed housing need takes no account of needs which are likely to arise from Oxford City. Reference should be included in the Executive summary for a review in order to meet Oxford's needs. The proposed distribution of housing does not take into account the reasonable alternative of new housing development in the green belt, other than a limited potential review around Kidlington.
199/2	Huw	Mellor	Kemp & Kemp / Mano Oak Homes	Main	9		Suggested amendment: "Policy Villages 1 identifies the most sustainable villages (Category A) in the District where <u>development proposals will be considered on their merits and on a site by site basis. minor development within built up limits will, in principle, be supported (typically sites of less than 10 dwellings).</u> It distinguishes these villages from those (in Category B) <u>where only minor development within built up limits will, in principle, be supported (typically sites of less than 10 dwellings) as well as development will be restricted to</u> infilling and conversions. The Housing Trajectory in Section E provides of small site 'windfall' allowance for such proposals."			Supports the recognition of Category A villages as being the most sustainable and supports the inclusion of Arncott within this category. The allocation of 750 dwellings on larger sites within the Category A villages through the Local Plan Part 2 is supported. However disagree to limit proposals to only 'minor development' (typically less than 10 dwellings), or restricting development within the built-up limits of settlements.
105/1	Paul	Butt	Paul Butt Planning Ltd / Altitude Real Estate LLP	Main	9	A specific figure of 750 is not justified and it could act as an unhelpful ceiling for Category A villages in helping to meet the objectively assessed housing needs across the Local Plan (Part 1) area arising from the 2014 Strategic Housing Market Assessment, not to assist the vitality of Cherwell's villages (Mod no. 7). The Plan should be deliverable over its period and should at least identify the sites for the further 750 homes within or outside the built-up limits of the Category A villages, including Arncott. It is not enough to say that "The policy is supported by the latest Strategic Housing Land Availability Assessment (SHLAA)". SHLAA Site AN025 at Arncott Motoparc, Murcott Road, Arncott was submitted through the SHLAA Call for Sites in 2014. The site was rejected as it is separate to the village and would impact on the existing entrance to the village which contradicts the modification which provide homes outside the built-up limits of the Category A villages. A Landscape, Townscape and Visual Appraisal is provided to address these issues. The modification is not consistent with national policy.	Modification should be changed to give the Local Plan (Part 1) more flexibility in meeting the objectively assessed housing needs across the Local Plan (Part 1) area and allow for more than the specific ceiling of 750 homes to be provided at the Category A villages, such as at Arncott. The 'allocated' sites should be identified in Policy Villages 2, and this should include the SHLAA site AN025. The identification of these allocated sites are an integral part of the strategy for making provision for the identified objectively assessed housing needs over the plan period and the outcome should not be left to some future date. In the event that the identification of sites for the 750 homes is considered to be 'non strategic' and that sites ought to be identified at some future dates, SHLAA site AN025 ought to be reconsidered for inclusion in the Local Plan Part 2 as an allocated housing site taking into account the accompanying Landscape, Townscape and Visual Assessment. Alternatively to be considered through a Neighbourhood Plan or determination of an application for planning permission on the site.			
137/3	Theresa	Goss	Adderbury Parish Council	Main	9	The lack of services is not reflected and Adderbury is wrongly categorised. The modification implies coalescence of the village with Banbury, in a similar way to Bodicote.				

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144/4	Theresa	Goss	Bloxham Parish Council	Main		Bloxham is currently in Category A, as a "service village". Bloxham is unable to provide the "services" implicit in this categorisation, e.g. Bloxham Primary School and GP surgery are at capacity. Category B villages now includes Minor Development.	To remove Bloxham from Category A and place in Category C due to the unprecedented number of recent permissions. These developments prevent Bloxham from "servicing" its satellite villages or enabling residents of Bloxham to access Primary Education if the parental choice is the village school. If Bloxham cannot be recategorised then the Local Plan must reflect somewhere that Bloxham should not be considered for any development other than infill and conversions for at least 11 years.			
178/4	Suzanne	Bangert	Terrance O'Rourke / Mr & Mrs Ashworth	Main	9		Policy Villages 1, and the Executive Summary which refers to it, should be amended to allow additional development Category C settlements, subject to specific tests over their acceptability. Proposed amendment: Policy Villages 1 identifies the most sustainable villages (Category A) in the District where minor development within built-up limits will, in principle, be supported (typically site of less than 10 dwellings). It distinguishes these villages from those (in Category B and C) where development will be restricted to infilling and conversions. The Housing Trajectory in Section E provides for small site 'windfall' allowance for such proposals.			We do not consider that the Plan as drafted supports the Council's Housing Strategy to increase the supply of homes and improve access to housing given the restrictions that it places through <i>Policy Villages 1</i> . In its revised form this policy, effectively prohibits all new development within the category 'c' villages except conversions and limited infill. On this basis we consider that the plan is not legally compliant and is unsound. The plan is not positively prepared as it will not meet the requirements of rural communities, and does not therefore constitute the most appropriate strategy. The NPPF, paragraphs 54 & 55, provide a presumption against isolated dwellings in the countryside but positively support housing where it will enhance or maintain the vitality of rural communities and where housing is promoted in response to local communities. Hence an entirely restrictive policy it is not justified and is inconsistent with national policy, which requires a presumption in favour of sustainable development, and includes the provision of housing in rural areas.
178/5	Suzanne	Bangert	Terrance O'Rourke / Mr & Mrs Ashworth	Main	9		A local review or strategic review that includes an assessment of the compliance of the existing boundary with the requirements of the NPPF should be carried out			The emerging Cherwell Local Plan represents an important opportunity to review the boundaries of the Green Belt, which has not been altered since it was established in 1975. There is an identified need for additional housing in the district, including the rural areas. The retention of the existing boundary and absence of either a strategic or local review means that the plan is not positively prepared. Four of the villages within Cherwell lie partly within and partly outside the Green Belt boundary, including the village of Merton. The Green Belt boundary at Merton fails to meet the requirements of paragraph 85 of the NPPF and as such the existing boundary is not consistent with national policy.
191/4	Michael	Robson	Cerda Planning Ltd / CALA Homes (Midlands) Ltd	Main	9		Reflect the need for distribution of housing in the rural area to reflect the role that each of the settlements play in the District, with greater housing to be attributed to locations such as Deddington and Bloxham.			Policy Villages 2 limits 750 houses to 24 Category A settlements over a 17 year period which equates to less than 2 dwellings per annum per settlement on average. This illustrates the low level of housing identified to the sustainable rural locations of the District and will not assist in addressing the important provisions set out within the Taylor Review. Not all the Category A villages exhibit the same level of sustainability credentials.
223/7	Patricia	Redpath	Kidlington Parish Council	Main	9					The Parish Council accepts that removing the separate target for Kidlington under policy villages 2 allows for a greater degree of flexibility.
229/8	Nik	Lyzba	JPPC / The Tripartite (Oxford University, Merton College and R.Smith)	Main	9				The SA should have considered the potential for development in the green belt at this stage and as a reasonable alternative to other development options.	Provision in order to meet Cherwell's objectively assessed housing need takes no account of needs which are likely to arise from Oxford City. Reference should be included in the Executive summary for a review in order to meet Oxford's needs. The proposed distribution of housing does not take into account the reasonable alternative of new housing development in the green belt, other than a limited potential review around Kidlington.
233/1	Jonathon	Porter	Barton Wilmore / Archstone Projects Ltd	Main	9					Welcome the recognition that dwellings in Category A villages will be delivered by a range of methods. (There is conflict between the executive summary and Policy Villages 1 in terms of which villages will receive minor development).

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264/9	Andrew	Hornsby-Smith		Main	9	Upper Heyford is in an unsustainable location, and an assessment of Kidlington's housing need is likely to identify need for up to 1700 new homes, therefore a housing target of only 750 homes for category A villages is likely to lead to unsustainable in-commuting to Kidlington, forcing house prices up and precluding young families from remaining in the area, which already has a shortage of affordable housing.	The Category A housing figure should be increased significantly to allow at least part of the unmet housing need to be met locally. It would be preferable for Kidlington to have a separate allocation but it is accepted that this would be premature prior to an actual needs assessment.			
166/50	Helen	Marshall	CPRE Oxfordshire	Main	10	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			
229/9	Nik	Lyzba	JPPC / The Tripartite (Oxford University, Merton College and R.Smith)	Main	10				The SA should have considered the potential for development in the green belt at this stage and as a reasonable alternative to other development options.	Provision in order to meet Cherwell's objectively assessed housing need takes no account of needs which are likely to arise from Oxford City. Reference should be included in the Executive summary for a review in order to meet Oxford's needs. The proposed distribution of housing does not take into account the reasonable alternative of new housing development in the green belt, other than a limited potential review around Kidlington.
061/2	Alan	Lodwick		Main	10	Objects to the use of the SHMA figures to inform the Local Plan.	All Modifications relating to the SHMA should be deleted.			
301/1	Bev	Hindle	Oxfordshire County Council	Main	11					Oxfordshire County Council (OCC) supports in principle the main modifications to the plan which increase the overall housing provision to meet in full the district's objectively assessed housing need as identified in the Oxfordshire SHMA 2014 and which is based on supporting economic growth. This is in line with government objectives to substantially boost the supply of housing and local objectives of the Strategic Economic Plan and the City Deal. The County Council supports the preparation of the local plan and the need to plan for a higher level of growth to meet future need. The County Council recognises the importance of planning for a 5 year housing land supply and the pressure districts are under in the current economic climate
301/4	Bev	Hindle	Oxfordshire County Council	Main	11					The County Council is working positively and pro-actively with the district council to ensure that infrastructure can be appropriately funded and delivered in a timely way. The council is aiming to agree mechanisms for the inclusion of infrastructure requirements as appropriate. As infrastructure needs and timing of provision become more fully developed through the on-going work, the most appropriate courses of action will become clearer. The aim is that an agreed approach can be included in a Statement of Common Ground to be provided in advance of the re-opening of the Hearing in December 2014.

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301/5	Bev	Hindle	Oxfordshire County Council	Main	11					The main issue for OCC is the identification, provision, funding and overall deliverability of the infrastructure and services needed to support the proposed level of growth, particularly with regard to transport infrastructure and secondary education provision at Banbury. The Council continues to do all it can to comply with the timescales agreed when the Hearing was suspended. The main modifications timescale is, though, tight and the infrastructure requirements associated with the additional and cumulative growth are still being identified. In addition, there is likely to be a need for other infrastructure such as additional household recycling facilities, library services and either a new Highways Depot in the north of the county or an extension to the existing Depot. In most cases, the requirements are not explicitly referred to in the plan. Due to tight timescales, infrastructure requirements associated with the additional growth are being identified at a late stage in the process and in most cases are not explicitly referred to in the plan. The Council's capital and revenue budgets are under significant pressure.
301/51	Bev	Hindle	Oxfordshire County Council	Main	11					With regard to transport, a great deal of work has already been undertaken in a short time to model the impacts of the additional growth. However, this work is iterative and on-going, hence the impacts and optimum solutions are still being fully assessed and developed. In testing the district-wide impacts, it has not been possible to 'run' modelling tests without first adding in mitigation or new infrastructure. This illustrates how critical it will be to provide mitigation as development comes forward. Further work is needed to establish whether infrastructure can be delivered within the time frame; this includes assessing whether land is available where needed, as well as design and engineering feasibility work, and assessing likely costs. The Council will provide a Transport Topic Paper in advance of the re-opening of the Hearing, which will set out the transport issues and the requirements. In the interim, a summary of key issues identified so far is attached as Annex 1. It should be noted that this information may change as the work develops.
301/9	Bev	Hindle	Oxfordshire County Council	Main	11					At the time of submitting this response, the Council's on-going work indicates that it is a possibility that some strategic infrastructure may be required within the first five years of the plan period. Bearing the above in mind and given that the work is on-going and the requirements still somewhat unclear, at this stage, the County Council considers that it is necessary that the following options remain available: - Early Review of the Plan - Tightening the Policy Language
301/10	Bev	Hindle	Oxfordshire County Council	Main	11					At this stage we anticipate that the proposed increase in housing and employment will have a high level of impact on roads across the district. In summary, if current travel patterns continue, significant delays to travel will be experienced over a much longer period of the day. If attractive alternatives to the car are available these may be used more but equally, non-essential trips for retail and leisure may be made less frequently. In exceptional circumstances some people will even change the destination in which a certain activity is undertaken, particularly non-work activities. There are accepted national methods for predicting these switches in behaviour and these have been incorporated into the district-wide modelling work.

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301/11	Bev	Hindle	Oxfordshire County Council	Main	11					The emphasis to continue with the current policy of concentrating the majority of growth at the two main towns of Bicester and Banbury means that investment will be required for key and potentially significant infrastructure within and around these urban areas to unlock growth. The evidence demonstrates that there is a need to marry this with encouraging people to use alternatives to the car for local journeys, particularly for non-work trips.
301/12	Bev	Hindle	Oxfordshire County Council	Main	11					Without mitigation measures the modelling work currently suggests significant delays on the strategic highway, at junction 11 of the M40, junction 10 and junction 9, as well as link issues along the A34. The Highways Agency are implementing improvements to junctions 9 and 10 through Growth Point funding to deal with current issues and are investigating what further works are required to deal with future growth. The Highways Agency is also undertaking a route strategy study for the A34 (in association with Oxfordshire County Council) and for the A43. It is in the County Council's interests to continue to support investment in the strategic highway and rail networks. The modelling suggests significant increased flows on the A4260 which may be ameliorated through improvements to the M40 and A34.
301/17	Bev	Hindle	Oxfordshire County Council	Main	11					In terms of Bicester, the main focus of the Bicester area transport strategy is to maximise use of peripheral routes for vehicular traffic and maximise the internal transport network for sustainable modes. The Main Modifications mean that significant improvements are required for the peripheral routes to still function in this way, coupled with investment in sustainable modes and travel choices.
301/18	Bev	Hindle	Oxfordshire County Council	Main	11					The capacity of the peripheral routes needs to expand further to facilitate the proposed growth. On the western corridor the new Howes Lane tunnel under the railway will unlock capacity; however this corridor will attract less traffic flow when there are 6000 houses, plus employment and other uses located there.
301/19	Bev	Hindle	Oxfordshire County Council	Main	11					This puts more emphasis on the eastern corridor. Along Southwold Lane, Skimmingdish Lane and Charbridge Lane there is scope to increase the junction and lane capacities. Along Neunkirchen Way and Wretchwick Way the options are more limited by the ancient monument. A new link through the proposed developments to the South East would increase capacity and enable easier integration across the existing roads from the new development.
301/20	Bev	Hindle	Oxfordshire County Council	Main	11					At Boundary Way there have been past proposals from developers and the County Council to increase capacity. The scheme due to be implemented by Bicester Village in the next year will put off the need for further capacity improvements for some years. However, the technical evidence demonstrates that this road will see significant congestion in the later parts of the plan period without further improvements. A new link road across the south-east of Bicester would resolve this issue and enable much better integration of the housing and employment developments to the south of Boundary Way.
301/21	Bev	Hindle	Oxfordshire County Council	Main	11					Further work is required to fully test route options for a south-east link road as no options are without issues. In the meantime Policy Bicester 10 should be amended to enable a route through that development to be further tested as this could be a crucial link.

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301/22	Bev	Hindle	Oxfordshire County Council	Main	11					Feasibility engineering work has been carried out to establish the issues with building a link road from Vendee Drive across to Graven Hill. This would require a road through Bicester policy area 10. Work is on-going to establish a preferred route for the link road, however, it is suggested that the wording in the policy under 'Infrastructure Needs' should be amended to safeguard a corridor so that the land to provide crucial infrastructure is available if required. Suggested wording is provided in Table of Detailed Comments.
301/23	Bev	Hindle	Oxfordshire County Council	Main	11					In terms of Banbury, an updated Banbury Highway Model (AM peak only) was developed during summer 2014. This Model has been used to test the impact of the proposed housing and employment growth on the highway network in Banbury in 2031, and to identify the mitigation required to manage this increase in traffic.
301/24	Bev	Hindle	Oxfordshire County Council	Main	11					Residential sites to the south of Banbury have, to date, come forward in a piecemeal way. Subsequently, this has impacted on the potential sustainability of these developments with no opportunity for bus services to route through the development sites, and with concerns also raised about local impacts including traffic routeing along Wykham Lane. A co-ordinated and planned approach to development to the south of Banbury, as proposed in the Local Plan Modifications, would enable provision of essential infrastructure including delivery of an east-west link from A361 Bloxham Road to join White Post Road. This would address issues of accessibility and sustainability whilst also relieving pressure on Wykham Lane.
301/25	Bev	Hindle	Oxfordshire County Council	Main	11					The proposed level of growth impacts significantly on the highway network in Banbury, particularly on Hennef Way (especially the Hennef Way/ Concord Avenue and Hennef Way/ Ermont Way Junctions), M40 Junction 11 intersection with Hennef Way, and Bridge Street/ Cherwell Street junction. Measures identified to mitigate the impact of proposed development include signalisation of the Hennef Way/Ermont Way junction.
301/26	Bev	Hindle	Oxfordshire County Council	Main	11					Trips associated with the employment land to the North East of Junction 11 (Banbury 15) have a significant impact on the network. Modelling work is ongoing to understand what mitigation might be needed and to provide more clarity around the timing of new infrastructure required.
301/27	Bev	Hindle	Oxfordshire County Council	Main	11					Modelling suggests that there are no concerns with off-slip traffic impeding through traffic on the M40, although OCC will liaise with the Highways Agency to undertake more detailed junction assessment of Junction 11. There are, however, severe delays for vehicles on the A361 southbound approach into Junction 11; access to Banbury 15 will be via the A361.
301/28	Bev	Hindle	Oxfordshire County Council	Main	11					Modelling shows that provision of a new link road east of M40 Junction 11, from the A422 to Overthorpe Road, significantly improves operation of the network (including Junction 11) during the AM peak, with delay on the A361 approach to Junction 11 reduced considerably. However, there are still significant delays at the Hennef Way/ Concord Avenue junction. Modelling work is ongoing to address performance issues at this junction.
301/29	Bev	Hindle	Oxfordshire County Council	Main	11					Further modelling work is also being undertaken to understand the impact of a new south-east road to connect the south of Banbury to Overthorpe Road/ Ermont Way and of an additional M40 junction south of Banbury.

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301/30	Bev	Hindle	Oxfordshire County Council	Main	11					In addition to effective mitigation, the significant traffic impacts associated with the proposed future growth in housing and employment in Banbury, highlights the need for an effective Sustainable Transport Strategy for the town, to promote and encourage alternatives to the car. Travel to Work Census Data (2011) highlights the significant opportunity that exists for promoting trips by sustainable modes, with 60% of work trips with a home origin in Banbury undertaken 'entirely within the settlement', yet with a high proportion of car trips used for these local journeys.
301/31	Bev	Hindle	Oxfordshire County Council	Main	11					In terms of Upper Heyford, the increased scale of development at Upper Heyford will generate additional traffic impacts on the local highway network, particularly between the former airbase and Bicester, which will require mitigation. In early conversations that the County has had with the Dorchester Group about this scale of mitigation, the developers have indicated that this level of mitigation is viable and deliverable through the proposed development. Even with mitigation however, there will still be a noticeable increase in traffic on the network and travelling through villages such as Middleton Stoney, Lower Heyford, Ardley, Somerton, Caulcott and The Astons.
301/32	Bev	Hindle	Oxfordshire County Council	Main	11					A proportion of the predicted impact on the transport network as a result of housing growth at Upper Heyford can be linked commuting traffic. Increasing employment and improving the housing/employment balance may reduce the need for people to travel offsite for employment. This could potentially be achieved through the intensification of the existing employment land on the site. Any increase in the area of employment land would necessarily need to be considered in light of the heritage and ecological constraints on the site.
301/33	Bev	Hindle	Oxfordshire County Council	Main	11					At the hearing in June, the Dorchester Group stated that development well in excess of 1,600 dwellings could be accommodated on the site. Based on the housing/employment mix proposed, as well as the impact of this growth on the local highway network, the County Council would be concerned about any further proposals in excess of the additional 1,600 homes; further housing growth would likely trigger the need for significant investment on the wider highway network. If further proposals for higher levels of growth in this location come forward, they should also be assessed as part of a comprehensive county-wide approach.
167/02				Main	14	It is considered that a review of the Green Belt is necessary now both to meet Oxford's needs and to meet part of the need assessed for Cherwell since it is argued that part of the allocation at Bicester would be better located closer to Oxford.	Substantially reduce residential allocations at Bicester pending early review of the Green Belt and new allocations closer to Oxford.			
151/3	Jan	Molyneux	Stephen Bowley Planning Consultancy / Shipton Ltd	Main	14	Cherwell has a duty to cooperate in the provision of housing land supply for Oxford city. There is an inadequate supply with thin the city.	There needs to be a strategic review of the Green Belt			
166/28	Helen	Marshall	CPRE Oxfordshire	Main	14	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			We note the reference to one of the options to a solution to Oxford City's perceived difficulties of meeting its notional housing targets in future, may include a possible strategic review of the Green Belt. It follows that if our arguments as laid out under Modification 28 are endorsed, that we do not accept the need for any such review.

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191/5	Michael	Robson	Cerda Planning Ltd / CALA Homes (Midlands) Ltd	Main	14					The housing figure proposed makes no allowance for the housing needs of Oxford therefore not meeting the full objectively assessed need. Concerned that the evidence from the SHMA in respect of meeting Oxford's housing needs have not been taken forward in the Main Modifications. It is expected that the Council will need to accommodate some of Oxford's unmet housing needs. New sites must be found, as such as land at Bicester, Deddington and Bloxham. The trajectory allows for no flexibility in meeting the housing figure. If any larger sites falls behind that indicated in the trajectory, or any of the identified sites do not come forward the housing figure will not be fulfilled. New settlements and large urban extensions could face deliverability challenges. Large strategic housing schemes will experience long lead-in times so they are not a short term or quick solution to housing land supply. This is usually as a result of new or major upgrades to surrounding infrastructure. Future rates of delivery will need to be realistic by considering the type of scheme, number of developers and how quickly developers can sell the homes built.
201/1	Debbie	Dance	Oxfordshire Preservation Trust	Main	14			Supported. Any review of the Green Belt will need to be a review of Oxford's Green Belt, carried out in a considered and comprehensive manner and involving all Oxfordshire authorities.		Concerned over the proposed SHMA housing targets for Oxford City and their view that these cannot be accommodated within their administrative boundary, putting pressure for building in outlying areas and, in particular, in the Green Belt. Would encourage the Council to work with the Oxfordshire authorities to enable Oxford and Oxfordshire to develop in a planned and considered way.
208/1	Alice	Kirkham	Persimmon Homes and Charles Church Midlands	Main	14	It is considered now would be the most appropriate time to carry out a review of the Green Belt. This would enable the assessment of all reasonable alternatives in meeting the full objectively assessed need including unmet need from Oxford City. This issue will need a clear commitment between the Oxfordshire authorities to demonstrate that this is being considered.	Cherwell should work with the other Oxfordshire authorities to put in place a clear timetable and plan of action to determine the most appropriate locations for meeting the full housing requirements. This should include a review of the Green Belt alongside an assessment of the other reasonable alternatives, in order that the most appropriate strategy can be agreed upon at the County level. This work should be undertaken prior to the adoption of Cherwell's strategic plan, in order that it can inform the policy direction.			
229/10	Nik	Lyzba	JPPC / The Tripartite (Oxford University, Merton College and R.Smith)	Main	14					It is not accepted that there is no need for a strategic review of the green belt at this stage. The proposals in the draft Plan would not comply with paragraph 85 of the NPPF in that the Council cannot be satisfied that the green belt boundaries shown will not need to be altered before the end of the plan period. The Council notes that a green belt review may be required within a 2 year period.
258/4	Craig	Barnes	Gladman Developments	Main	14		The Plan should include a policy commitment to the review of the Local Plan housing requirement and spatial strategy should additional needs arise in the future. The Policy should be written in a way that it is activated when neighbouring authorities make a former request for an explicit level of housing to be met by Cherwell through Duty to Cooperate.		No comment	This is not considered to be sufficient to guarantee that any unmet housing needs arising from the District's neighbours within the Housing Market Area will be met by Cherwell District Council once the level of need is established. Understand that the Inspector cannot force the Council into undertaking a Green Belt review and disagree with Oxford City Council that any needs arising from the city must be accommodated in this area.
264/1	Andrew	Hornsby-Smith		Main	14			Welcomes the emphasis on the importance of the Green Belt in checking the sprawl of Oxford and indicates a strategic review would be premature in the absence of a completed land availability assessment in Oxford City. The process by which a strategic review of the Green Belt in the Oxford area may occur at a future date is logical.		

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270/1	David	Jackson	Savills / University of Oxford	Main	14	The modifications do not address Oxford's unmet housing need. This approach is inconsistent with the NPPF para 83 and is inadequate given the scale and severity of the housing requirement. It will prolong the housing crisis and put deliverability of the Strategic Economic Plan at risk. A related concern is Green Belt review; the modifications indicate the Green Belt is to be reviewed now to meet local needs, then again to accommodate other development needs, contrary to the NPPF.	Oxford's unmet housing need should be addressed in emerging Local Plans at the earliest opportunity. Necessary joint working should be undertaken now rather than delay delivery and continue to exacerbate housing affordability issues and damage the local economy. Oxford's housing needs have been accommodated in the adjoining authorities in the past with the "country towns strategy" and was acknowledged in the sub-regional spatial strategy for Central Oxfordshire contained in the South East Plan and it would be a departure from past planning strategies for the county for an authority to proceed with its Local Plan without accommodating an element of the housing requirement arising from Oxford.			
305/1	Andrew	Bower	Court Consulting / Mr & Mrs P&S Beecroft; N Godwin Esq; AJ Wilcox Esq; EG Wilcox Esq; M Howard Esq	Main	14			The significant strategic modifications made to the Submission Cherwell Local plan in proposed Modification 14 is supported. There is clear recognition that all Oxfordshire planning authorities will need to co-operate to meet Oxfordshire's housing requirement arising from the 2014 SHMA. The need for an early review of the Cherwell Local Plan and the breadth of that review is applauded.		Oxford City Council has stated publicly that neighbouring districts, including Cherwell, are failing to take account of the City's unmet housing need. Given that the SHMA calculates Oxford's needs to be between 24,000 and 32,000 (2011-2031) and the SHLAA (Dec 2013) shows capacity for 4,674 (2013-33) a possible outcome will be a strategic review of the Green Belt. The timetable for the review of Cherwell Local Plan should be established and confirmed as soon as possible.
179/4	Matthew	Bates	Oxford City Council	Main	14	Changes needed to reflect the emerging approach from the Oxfordshire Growth Board.	Amend this paragraph to read as below: There is no immediate necessity for a strategic review of the Green Belt, which currently plays an important role in checking the urban sprawl of Oxford. Any future review of the Plan will require the cooperation of all authorities in Oxfordshire to meet the County's total housing need arising from the need assessed in the 2014 SHMA. This will include catering for the housing needs of Oxford City. A strategic Green Belt review is one of a number of options to will be undertaken as part of consider in meeting the County's overall housing needs. All This reflects that local authorities in Oxfordshire are working jointly to take forward the conclusions of the new Oxfordshire SHMA and the outcome of this joint work may lead to a strategic Green Belt review.			
179/5	Matthew	Bates	Oxford City Council	Main	14	Object that the Plan now provides a policy mechanism for reviewing the Green Belt around Kidlington to meet "local" housing need, relating to the increase in the rural housing allocation, whilst not recognising that this is also part of, and inseparable from, the wider needs of the HMA.	If the Plan were to progress, the City Council insists that references to 'local' Green Belt reviews are deleted and instead text introduced into Policy ESD14 and supporting text to set out a timetable for a strategic joint review of the Green Belt, should this be necessary (as expected) to meet both Cherwell's housing needs and those of the wider HMA (detailed suggestions provided).			
301/6	Bev	Hindle	Oxfordshire County Council	Main	14					Modification 14 states that there is no immediate necessity for a strategic review of the Green Belt and that any future review will require the co-operation of all authorities and could be one option for dealing with unmet need. This modification is supported as any strategic Green Belt review needs to be undertaken comprehensively.
301/52	Bev	Hindle	Oxfordshire County Council	Main	14	States that there is no immediate necessity for a strategic review of the Green Belt and that any future review will require the co-operation of all authorities and could be one option for dealing with unmet need.	This modification is supported as any strategic Green Belt review needs to be undertaken comprehensively across the county.			

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097/1	Sue	Mackrell	Bicester Town Council	Main	15	Concerns regarding connectivity from and to Bicester Town Centre, particularly the London Road access which is to be severely compromised by Network Rail developments and their impact on the level crossing. An alternative route needs to be agreed and provided at an earliest opportunity. Support improvements to Market Square, however, need to ensure no development takes place until connectivity to and from the Town Centre, including the London Road level crossing issue, has been resolved. The creation of an Eastern perimeter road around Graven Hill is essential to ensure the smooth movement of traffic around the town. The preferred option is to locate the road to the SE. Cycle and pedestrian routes need to be fully integrated offering users the opportunity to access all parts of the town easily and safely.	Greater emphasis needs to be placed on cycle and pedestrian routes to enable residents living on larger developments to access the town centre and bus and rail connections quickly, easily and safely.	Welcome the Duty to Cooperate where it is leading to joint management of traffic related issues, in particular traffic growth on the A41, congestion challenges on the M40 Junction 10 and North Oxford Transport Strategy.		
175/1	Mike	Pollard	Banbury Ornithological Society	Main	15		Protection to existing hedgerows, including 20m buffer strips managed as semi-natural grassland. To retain some patches of long established pasture, including ridge and furrow grassland, at the edge of the development, to effectively blend into the agricultural landscape. These fields to be restored as flower rich semi-natural habitat to ensure a net gain in biodiversity is achieved.			The proposed development of Banbury 15 will occupy an extensive area of long-established pasture and hedgerows. The development of the site as employment land whilst delivering a net gain in biodiversity will require high quality ecological planning, good protection of the hedgerows (including effective set-back of development). Long-established pasture, even where grassland has been agriculturally improved, is still a rich habitat for many farmland birds and other wildlife.
208/2	Alice	Kirkham	Persimmon Homes and Charles Church Midlands	Main	15	Insufficient co-operation with Oxford City Council and other Oxfordshire authorities in meeting the county's housing needs. Fail to take account of the unmet housing needs of Oxford City. This should be considered now as any delay would lead to a larger backlog of housing need and will be even more difficult to meet.	The Plan should include a higher housing requirement following proper consultation of the appropriate share of Oxford City's housing needs that the district should meet.		The Sustainability Appraisal fails to assess the alternative of planning for a higher quantum of housing to meet some of the wider housing market area's needs (i.e. some of the unmet need from Oxford City).	
270/2	David	Jackson	Savills / University of Oxford	Main	15	The modifications do not address Oxford's unmet housing need. This approach is inconsistent with the NPPF para 83 and is inadequate given the scale and severity of the housing requirement. It will prolong the housing crisis and put deliverability of the Strategic Economic Plan at risk. A related concern is Green Belt review; the modifications indicate the Green Belt is to be reviewed now to meet local needs, then again to accommodate other development needs, contrary to the NPPF.	Oxford's unmet housing need should be addressed in emerging Local Plans at the earliest opportunity. Necessary joint working should be undertaken now rather than delay delivery and continue to exacerbate housing affordability issues and damage the local economy. Oxford's housing needs have been accommodated in the adjoining authorities in the past with the "country towns strategy" and was acknowledged in the sub-regional spatial strategy for Central Oxfordshire contained in the South East Plan and it would be a departure from past planning strategies for the county for an authority to proceed with its Local Plan without accommodating an element of the housing requirement arising from Oxford.			
179/6	Matthew	Bates	Oxford City Council	Main	15	The Duty to Cooperate (DTC) is a legal requirement and is therefore fundamental to a Local Plan being found sound. The City Council's view is that DTC has not been complied with by Cherwell District Council in preparing their submission Local Plan. Detailed reasons for this view are set out in its Examination statements (June 2014), legal submissions at the Examination, and set out in the letter sent to the Programme Officer on 16th July 2014.				

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179/7	Matthew	Bates	Oxford City Council	Main	15	Object to the revised section titled 'Duty to Cooperate', as it makes only passing reference to working with neighbouring Oxfordshire local authorities (via SPIP – now the Oxfordshire Growth Board), and no reference at all to addressing the cross-boundary housing and employment needs and objectives as set out in the City Deal and Oxfordshire Strategic Economic Plan (SEP). This underlines the overall lack of recognition in the Plan of these pressing cross-boundary issues, which go well beyond the District boundary. Much stronger reference is needed to Oxfordshire joint working, particularly in respect of the SHLAA and City Deal, recognising the specific challenges being faced by the Housing Market Area and how these will be addressed.	Add new paragraph 1.49ddd: <u>It is particularly important to recognise the important relationship between Cherwell and the other local authorities in Oxfordshire. Cherwell District Council has signed the Oxford and Oxfordshire City Deal, and fully endorses the Oxfordshire Strategic Economic Plan prepared by the Local Enterprise Partnership together with the partner local authorities. Cherwell District Council is a member of the Oxfordshire Growth Board, incorporating the former Spatial Planning and Infrastructure Partnership (SPIP). The Board is challenged with the pressing need to deliver the objectively assessed need for around 100,000 new homes in Oxfordshire (the Housing Market Area) to support a growing population, the need for affordable housing and planned economic growth. The Council fully endorses this objective, which includes addressing the need to accommodate the unmet housing need arising from Oxford that cannot be accommodated within the City's own boundaries. Policies PSD2 and BSC1 provide for this.</u>			
161/1	Martin	Small	English Heritage	Main	16					(Although not, in itself, a reason to consider the Plan unsound, English Heritage has concerns about the figure of 1,600 dwellings being proposed for the Former RAF Upper Heyford – see our comments on Proposed Modification 157).
166/51	Helen	Marshall	CPRE Oxfordshire	Main	16	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			
223/1	Patricia	Redpath	Kidlington Parish Council	Main	16					The Parish Council is concerned about the traffic impact of development on the Oxford Road (A4260) in Kidlington and that no information is provided about plans to mitigate the traffic impact of development.
264/3	Andrew	Hornsby-Smith		Main	16	The increased housing allocation makes development at Upper Heyford even less sustainable than that originally proposed because it will not trigger sufficient local infrastructure changes to make the site easily accessible from the M40. Most Oxford bound commuter traffic will use the A4260 through Kidlington which is already congested at peak times.	Objects to Modification 16. Some housing could be allocated to Upper Heyford, and some to the omission site at Woodstock, with most housing allocated to the southern rural area in category A settlements (modifications 9, 146, 147, 163).			
061/3	Alan	Lodwick		Main	16	Objects to the use of the SHMA figures to inform the Local Plan.	All Modifications relating to the SHMA should be deleted.			
179/8	Matthew	Bates	Oxford City Council	Main	16	Changes required to make clear that the Spatial Strategy will need to be reviewed following SHMA 2014 publication	Add the following paragraph: <u>A10a The spatial strategy set out below will, however, need to change early in the Plan period. The Strategic Housing Market Assessment was published in March 2014, and identifies significant unmet housing need arising from Oxford, only a proportion of which can be met within its own boundaries. Under the Duty to Cooperate, neighbouring Councils must plan across administrative boundaries to meet all unmet housing need. Therefore, Policy PSD2 of this Plan commits to an early review of the Cherwell Local Plan. This will include an assessment of whether the Green Belt boundary around Oxford should be reviewed to ensure the wider housing needs of the area can be met in a sustainable way.</u>			
151/4	Jan	Molyneux	Stephen Bowley Planning Consultancy / Shipton Ltd	Main	17	The local housing needs of Kidlington should be met as part of the Local Plan through a substantial allocation at Shipton on Cherwell	Allocation at Shipton on Cherwell			

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166/34	Helen	Marshall	CPRE Oxfordshire	Main	17	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.				There are no special circumstances which can be demonstrated to justify small local reviews of the Green Belt, and that by introducing their possibility the Council will open itself to a welter of applications to develop within the Green Belt based on imagined "special circumstances" driven solely by a desire for commercial advantage. The planned industrial and residential developments at Oxford's Northern Gateway and at Bicester seem to provide more than adequate relief for any needs Kidlington may have in the Plan period. Added to this the proposal for Woodstock to expand by a 1,500 dwellings to be built on land south of Perdiswell Farm on the Shipton on Cherwell road (scoping application 14/00049/SCOP - received just after the Local Plan modifications were issued, but not included in those modifications), suggests that any additional housing requirements in the vicinity of Kidlington are not going to be an issue.
178/6	Suzanne	Bangert	Terrance O'Rourke / Mr & Mrs Ashworth	Main	17		A small scale local review of the Green Belt at Merton should be carried out and the boundary amended to exclude the western edge of Merton from the Green Belt. Proposed amendment: Development in the open countryside will be strictly controlled. In the south of the district, the existing Green Belt will be maintained, though a small scale local review of the Green Belt will be conducted to accommodate identified employment needs and may be required to meet local housing needs at Kidlington. <u>Further small-scale local review of the Green Belt will also take place at Merton to ensure compliance of the Green Belt boundary with the requirements of the NPPF.</u> In the north west of the district, the small area lying within the Cotswold Area of Outstanding Natural Beauty will similarly be protected.			Opportunity to review the boundaries of the Green Belt, which has not been altered since it was established in 1975. There is an identified need for additional housing in the district, including the rural areas. The retention of the existing boundary and absence of a local review means that the plan is not positively prepared. The Green Belt boundary at Merton fails to meet the requirements of paragraph 85 of the NPP. A review of the Green Belt boundaries would assist in ensuring housing required in Cherwell, and to meet the needs of Oxford City, which is particularly constrained by the existing boundaries is met.
201/2	Debbie	Dance	Oxfordshire Preservation Trust	Main	17	Objects to the Council's approach to development in the Oxford Green Belt. Acknowledge the SHMA and Duty to Cooperate however there is no agreement that the Oxford Green belt should be reviewed on a small or strategic scale in order to allow land within it to be released for development. Proposal for a small scale Green Belt review at Kidlington is not justifiable or acceptable. Suitable and brownfield sites should be continued to be use where possible.	Delete the proposed wording " and may be required to meet local housing needs at Kidlington. ".			
223/2	Patricia	Redpath	Kidlington Parish Council	Main	17					The Parish Council is concerned about the change in position regarding the sentence "further small scale local review of the green belt boundary around Kidlington will also be undertaken as part of Local plan part 2 if the villages local needs cannot be accommodated within the built up area" and continues to take the view that the Green Belt around Kidlington should be protected but is inclined to accept that the logic of the modification, given that an insufficient number of possible development sites have been identified within the village boundaries and subject to completion of a local housing needs assessment. However the Parish Council is seeking reassurance on how Kidlington's housing needs will be assessed and a decision reached on whether the local review of the Green Belt will be necessary. It also takes the view that while any Green Belt should only be concerned with Kidlington's housing needs, it should address all possible options for meeting them. Require confirmation that these issues will be addressed in a dialogue with the Council through the masterplan process.

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264/4	Andrew	Hornsby-Smith		Main	17			Supports these modifications which allow for the possibility that whilst the initial purpose of the local Green Belt review is for employment, a later review could encompass the remainder of the area of search once Kidlington's local housing need has been assessed further. This is highly likely to trigger the need for a local Green Belt review.		
179/9	Matthew	Bates	Oxford City Council	Main	17	Changes required to make clear that the Spatial Strategy will need to be reviewed following SHMA 2014 publication.	Amend paragraph A11 to read as follows: A11 [last bullet point] Development in the open countryside will be strictly controlled. In the south of the district, the existing Green Belt will be maintained <u>pending an early review of this Plan, though a small scale local A strategic</u> review of the Green Belt will be conducted <u>which will include</u> to accommodate identified employment needs. In the north west of the district, the small area lying within the Cotswolds Area of Outstanding Natural Beauty will similarly be protected.			
179/10	Matthew	Bates	Oxford City Council	Main	17	Object that the Plan now provides a policy mechanism for reviewing the Green Belt around Kidlington to meet "local" housing need, relating to the increase in the rural housing allocation, whilst not recognising that this is also part of, and inseparable from, the wider needs of the HMA.	If the Plan were to progress, the City Council insists that references to 'local' Green Belt reviews are deleted and instead text introduced into Policy ESD14 and supporting text to set out a timetable for a strategic joint review of the Green Belt, should this be necessary (as expected) to meet both Cherwell's housing needs and those of the wider HMA (detailed suggestions provided).			
047/5	Matthew	Coyne	Banbury Town Council	Main	18					Concern that further B8 warehousing which employs few and low skilled. All major housing sites with the exception of Higham are located to the west of the railway.
246/1	Tom	Armfield	Barton Willmore / Hundred Percent Hella	Main	18	The proposed Modification to increase employment land by a further 80 hectares (more than double to identified need) is excessive and not justified. Object to the significant over provision of approximately 135 hectares.	The amount and spatial distribution of employment land should be reviewed, including a review of the former Hella Manufacturing site which is allocated for employment development. Residential use remains an option. The site has been vacant since the mid 2000s and there has been an absence of market interest for employment development other than that of Prodrive for its new Headquarters. The existing building would meet modern occupier requirements, would give rise to significant remodelling costs and was not sustainable for Prodrive. The site is suitable and could be delivered quickly for housing.			
179/11	Matthew	Bates	Oxford City Council	Main	18	Serious doubts exist as to whether it is appropriate to focus so much new employment development around Bicester and Banbury, and whether this will be delivered in Cherwell at the rate envisaged, if past trends are taken into account. There is a lack of a considered approach that aligns with the SHMA 2014 / Cambridge Econometrics and the Oxfordshire Innovation Engine. The Duty to Cooperate, in terms of fully exploring the impacts and deliverability of the changed strategy, has not been met.	No overall increase in employment land			
151/5	Jan	Molyneux	Stephen Bowley Planning Consultancy / Shipton Ltd	Main	19		A substantial allocation of development land within Shipton on Cherwell would be capable of providing employment provision in addition to a significant housing allocation. Would provide employment facilities within the Kidlington area, allowing for the redevelopment of less appropriate outworn buildings within the urban area.			
210/2	Adrian	Gould	JPPC / Bicester Heritage Ltd	Main	19	It is considered that the increased allocation of employment land at North East Bicester has not been justified in that due regard has not been given to the potential to allocate a proportion of the additional employment land to the former RAF Bicester, where land for such purposes is both suitable and available.	The Technical Site and Flying Field should be allocated as a strategic employment site which is suitable for meeting some of the increased demand for B1 and B8 purposes that has been identified for this area of Bicester.		No comment	

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224/1	Peter	Frampton	Framptons	Main	19					The provision of a large scale mixed use allocation at land north of the A41 in South East Bicester (Bicester 12) is fully supported. Such a location is considered to be a natural, sustainable and logical annex to the town.
224/1	Peter	Frampton	Framptons	Main	19					Modification 19 is supported and is seen as proactive, pro-growth and reflecting market signals. The reference to logistics will remove any ambiguity to the policy basis for future development management decisions.
246/2	Tom	Armfield	Barton Willmore / Hundred Percent Hella	Main	19	The proposed Modification to increase employment land by a further 80 hectares (more than double to identified need) is excessive and not justified. Object to the significant over provision of approximately 135 hectares.	The amount and spatial distribution of employment land should be reviewed, including a review of the former Hella Manufacturing site which is allocated for employment development. Residential use remains an option. The site has been vacant since the mid 2000s and there has been an absence of market interest for employment development other than that of Prodrive for its new Headquarters. The existing building would meet modern occupier requirements, would give rise to significant remodelling costs and was not sustainable for Prodrive. The site is suitable and could be delivered quickly for housing.			
302/3	David	Jackson	Savills	Main	19			Supported, insofar as additional employment allocation is identified at Banbury on land north east of Junction 11 of the M40. Given the very significant increase in the scale of housing allocations at Banbury, additional employment allocation for the town has been made even more compelling.	Welcome the analysis of the site contained in the SA Addendum. The SA identifies one significant adverse effect of the allocation and that is in relation to the loss of greenfield land. This is however an inevitable consequence of providing additional land for development at Banbury, given the lack of brownfield alternatives. The other adverse effects are assessed in the SA as being minor and are not considered to outweigh the benefits of allocating the site.	
179/12	Matthew	Bates	Oxford City Council	Main	19	Serious doubts exist as to whether it is appropriate to focus so much new employment development around Bicester and Banbury, and whether this will be delivered in Cherwell at the rate envisaged, if past trends are taken into account. There is a lack of a considered approach that aligns with the SHMA 2014 / Cambridge Econometrics and the Oxfordshire Innovation Engine. The Duty to Cooperate, in terms of fully exploring the impacts and deliverability of the changed strategy, has not been met.	No overall increase in employment land			
235/4	Simon	Gamage	RPS / Mr Bratt	Main	20		Policy SLE 1 should direct more employment to the rural area and allow for the potential allocation of new rural employment sites in the Local Plan.			Policy SLE 1 should direct more employment to the rural area and allow for the potential allocation of new rural employment sites in the Local Plan.
179/13	Matthew	Bates	Oxford City Council	Main	20	Serious doubts exist as to whether it is appropriate to focus so much new employment development around Bicester and Banbury, and whether this will be delivered in Cherwell at the rate envisaged, if past trends are taken into account. There is a lack of a considered approach that aligns with the SHMA 2014 / Cambridge Econometrics and the Oxfordshire Innovation Engine. The Duty to Cooperate, in terms of fully exploring the impacts and deliverability of the changed strategy, has not been met.	No overall increase in employment land			

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245	Peter	Frampton	Framptons	Main	21	The Plan, and specifically policy SLE1, fails to address the spatial needs of the logistics sector particularly the known occupier needs and requirements for both Regional Distribution Centres (RDCs) and National Distribution Centres along the M40 corridor. There is a pressing and immediate demand for new large-scale logistics facilities in the area to meet the needs of the strategic logistics sector. This need derives from the confluence of the strategic highway network which provides the required quality of access to markets and the ports. Sites of this scale requirement are difficult to identify and secure.	Land at the junction of the A43 / B4100 (near junction 10 of the M40) is ready for delivery with no technical constraints and is highly proximate to the motorway network will meet employment needs. The investment will create thousands of new jobs in the process thereby bringing new opportunities and economic activity to the district more broadly and Bicester in particular. Such a location is well suited to the needs of the strategic logistics sector requiring easy access to markets in West and East Midlands, and the South East. Similarly the M40/A43 junction in the strategic road network provides effective access from the Channel Ports and the deep sea ports at London Gateway and Southampton. The site comprises 41 ha and could be developed to accommodate at least eight 250,000 sq.ft distribution units providing approximately 2,667 new jobs. Savills demonstrate that there is substantial demand within the M40 corridor for large scale logistics floorspace (in excess of 250,000 sq feet) to function as an RDC/NDC.			
002/1	Gary	Bell		Main	21	The Green Belt is still an important part of National Policy and yet this document is being changed in a way that will weaken its protection by use of loose and vague language. The wording is also not effective as this wording cannot be classed as being 'deliverable' when such vague terms apply.	Definition of "very special circumstances" is needed.		No comment	
047/6	Matthew	Coyne	Banbury Town Council	Main	21					Would like to see restrictions placed on B8 class use development on strategic employment sites
227/1	Peter	Frampton	Framptons / Barwood	Main	21					Policy SLE1 does not make adequate provision for the known business needs of the logistics sector at Junction 9 of the M40.
227/2	Peter	Frampton	Framptons / Barwood	Main	21		The Local plan should include an area of search policy for logistics operations of a regional and national scale in the vicinity of Junction 9 of the M40.			
227/3	Peter	Frampton	Framptons / Barwood	Main	21					Land at Junction 9 (shown on the submitted Plan) would be suitable location for regional logistics in the latter part of the Plan period. A desktop survey and study of heritage and ecological constraints was commissioned by Barwood and the results show that this is a reasonable and appropriate location for development in archaeological terms and it is not considered that there are any in principle/significant constraints to the promoted development at the current time.
229/11	Nik	Lyzba	JPPC / The Tripartite (Oxford University, Merton College and R.Smith)	Main	21					It should be clarified that employment development in and around Begbroke Science Park including a review of the green belt boundaries is regarded as acceptable and is not caught by the restrictive criteria set out for Kidlington or the Rural Areas.
232/1	Matthew	Hayes	GVA / Oxford Aviation Services	Main	21					Support the change to the Local Plan which supports the redevelopment of sites for existing employment uses.
232/2	Matthew	Hayes	GVA / Oxford Aviation Services	Main	21					Support for the introduction of criteria which allows for the redevelopment of employment sites. The policy should go further and be more positive.
235/7	Simon	Gamage	RPS / Mr Bratt	Main	21					Supports changes made to Policy SLE1 to be more positive to development in the rural areas
179/14	Matthew	Bates	Oxford City Council	Main	21	Serious doubts exist as to whether it is appropriate to focus so much new employment development around Bicester and Banbury, and whether this will be delivered in Cherwell at the rate envisaged, if past trends are taken into account. There is a lack of a considered approach that aligns with the SHMA 2014 / Cambridge Econometrics and the Oxfordshire Innovation Engine. The Duty to Cooperate, in terms of fully exploring the impacts and deliverability of the changed strategy, has not been met.	No overall increase in employment land			

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179/15	Matthew	Bates	Oxford City Council	Main	21	A significant increase in allocated employment land is not considered deliverable given past trends and the likely pattern of future employment growth around Science Vale and Oxford. However if built out as envisaged, it would not align with the SHMA and its supporting evidence, and would create an imbalance between employment and housing in Cherwell and the HMA.				
304/1	Chris	Goddard	DP9 Ltd / Value Retail (Bicester Village Ltd)	Main	22			Welcomes the deletion of reference to Bicester Village Outlet Shopping Centre ("BV") and subsequent recognition that BV performs a different role to the other centres listed in paragraph B.55. Recognises the significant contributions that BV makes towards Cherwell's local economy and tourism and confirms that the Council will support the expansion of BV.		
167/03	Colin	Cockshaw	Bicester Against Eco-Con (BAECon)	Main	23	The huge amount of retail development at Bicester Village (BV) is totally out of scale with the needs of the area. The Council argues that it is 'complementary' to the town centre, but in fact it detracts from the town centre, not just by taking trade away, but by depressing the shopping offer in the town centre as it appears that 'better quality' retailers are reluctant to consider the town centre. In consequence Bicester town centre has hardly any 'better quality' High Street retailers, no department store and is characterised by the cheaper end of the retail industry, with a high proportion of charity shops, difficulty in letting newly built units and a recent tendency for change of use of these new A1 retail units to A2 or other uses. As the town centre and BV are separate entities and some distance apart it is not clear how BV could have a role in further redevelopment which could benefit the town centre. The reverse is more likely. The Council suggests that visitors to BV will benefit the town centre by bringing in additional trade, but in practice very few visit the town centre, except to catch a bus, walk through on their way back to the railway station, or because they are lost! On the other hand BV attracts huge volumes of traffic every day This causes major traffic problems at key times in the southern part of the town which impedes town centre traffic. The Council do not offer evidence to support their views, so it is considered that these policy statements are not justified. Any further expansion of Bicester Village should be resisted unless it can be shown that these problems will no longer apply.	Delete modifications 23 and 78 and substitute new policy statements aimed at containing growth of Bicester Village unless and until measures are in place to counter adverse effects on the town centre noted above and either control traffic or redirect traffic away from the present main entrance to the site.			
304/2	Chris	Goddard	DP9 Ltd / Value Retail (Bicester Village Ltd)	Main	23			Welcomes the deletion of reference to Bicester Village Outlet Shopping Centre ("BV") and subsequent recognition that BV performs a different role to the other centres listed in paragraph B.55. Recognises the significant contributions that BV makes towards Cherwell's local economy and tourism and confirms that the Council will support the expansion of BV.		
047/7	Matthew	Coyne	Banbury Town Council	Main	25					Developer Contributions should be used to fund a South East Banbury Relief Road.
301/14	Bev	Hindle	Oxfordshire County Council	Main	25					Modification 25 proposes additional wording to the supporting text of Policy SLE 4 (Improved Transport and Connections) to strengthen the Council's ability to negotiate contributions or provision of infrastructure and services. However, it is considered that given the cumulative impact of the growth now proposed, the need to collect contributions towards schemes as development comes forward, the concerns about the identification of infrastructure requirements late in the process, and the lack of inclusion of some strategic infrastructure in the plan, amended wording should be included in the policy itself rather than the supporting text. This would provide some reassurance that the plan provides an adequate hook to secure contributions to transport infrastructure. In the absence of such a policy, the deliverability of key strategic infrastructure could prove problematic.

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301/15	Bev	Hindle	Oxfordshire County Council	Main	25					The proposed wording in Mod 25 refers only to Banbury and Bicester. Given that development outside these areas, including at Upper Heyford, would also be required to mitigate its transport impact, it is suggested that the wording should be modified to make it more widely applicable.
301/16	Bev	Hindle	Oxfordshire County Council	Main	25					The Council also considers that the district should work towards adopting a Community Infrastructure Levy at the earliest opportunity and will do all it can to work with the district to achieve this.
301/53	Bev	Hindle	Oxfordshire County Council	Main	25	Policy SLE 4 – Improved Transport and Connections The proposed (suitably amended) wording in paragraph B.68a should be included in Policy SLE 4, rather than just in the supporting text on pages 44-46. The wording refers only to Banbury and Bicester. However, new development will be required to mitigate its impact outside of these settlements as well. The wording should therefore reflect the more general requirement and apply across the district as a whole.	Amend the wording of paragraph B.68a as follows and insert the text into Policy SLE 4: "New development in Banbury/Bicester <u>the district</u> will be required to provide financial and/or in-kind contributions to mitigate the impacts of development. This will support the delivery of the infrastructure and services needed to facilitate travel by sustainable modes in and around the town , whilst also enabling improvements to be made to the local and strategic road and rail networks".			
301/54	Bev	Hindle	Oxfordshire County Council	Main	25	Paragraph B.69 states: "Over the life of the plan there will be investment in the highway network as well as contributions from development to strengthen the road infrastructure of the plan area. This will include the SW Bicester This paragraph needs updating to reflect the outcome of modelling work resulting from the main modifications. Amend text as follows: "..... This will include the SW Bicester Perimeter Road 2 Perimeter Road (Vendee Drive, already completed) and new strategic highway improvements including, potentially, on peripheral routes in Bicester, a possible new relief road at South East and East Bicester, improvements to Windsor Street in Banbury, to the A34 south from Bicester and improvements to Motorway Junctions 9 and 10 on the M40 of which Junction 9 is programmed for early delivery. There will also be improvements to the Windsor Street/Upper Cherwell Street Corridor. These improvements will collectively enable additional development capacity to be provided within the two towns. The assessment of routes for the potential relief road referred to in the policy below would need to take into account the environmental impact of the proposals including the impact on the purposes of the green buffer policy will need to be taken into account".	This paragraph needs updating to reflect the outcome of modelling work resulting from the main modifications. Amend text as follows: "..... This will include the SW Bicester Perimeter Road(Vendee Drive, already completed) and new strategic highway improvements including, potentially , on peripheral routes in Bicester, a possible new relief road at South East and East Bicester, improvements to Windsor Street in Banbury , to the A34 south from Bicester, improvements to Motorway Junctions 9 and 10 on the M40 of which Junction 9 is programmed for early delivery. <u>There will also be improvements to the Windsor Street/Upper Cherwell Street Corridor in Banbury, to Hennef Way junctions, and the Bridge Street/Cherwell Street junction in Banbury, and mitigation to M40 Junction 11, which may include a link road to the east of the Junction.</u> These improvements will collectively enable additional development capacity to be provided within the two towns....".			
047/8	Matthew	Coyne	Banbury Town Council	Main	27					Concern expressed over inadequate provision of cycle paths. Developer contributions should be used to fund public transport and public footpaths.
097/2	Sue	Mackrell	Bicester Town Council	Main	27	Concerns regarding connectivity from and to Bicester Town Centre, particularly the London Road access which is to be severely compromised by Network Rail developments and their impact on the level crossing. An alternative route needs to be agreed and provided at an earliest opportunity. Support improvements to Market Square, however, need to ensure no development takes place until connectivity to and from the Town Centre, including the London Road level crossing issue, has been resolved. Cycle and pedestrian routes need to be fully integrated offering users the opportunity to access all parts of the town easily and safely.	Greater emphasis needs to be placed on cycle and pedestrian routes to enable residents living on larger developments to access the town centre and bus and rail connections quickly, easily and safely.			
301/55	Bev	Hindle	Oxfordshire County Council	Main	27	Policy SLE 4 – Improved Transport and Connections The Policy refers to both 'Movement Strategy' and 'Movement Study' and should be consistent.	References to "Movement Studies" in the first bullet point of Policy SLE 4 should be amended to "Movement Strategies".			

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117	Emma	Luo		Main	28		The much lower housing numbers as proposed in the original draft Local Plan should be reinstated.			Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40% in 17 years. This level of growth or one approaching percentage is unrealistic, will erode any sense of community as well as irrevocably damage the associated environment, countryside and eco-system. Pragmatically, the road network and public services will struggle to cope with this level of growth either in such a short time span and as such render this plan as completely unworkable and short sighted - the result of either incompetence or idealism. There are vociferous objections to the SHMA by people from all walks of life based on the fact that the scheme is blinkered on one thing only and that is the building a staggering number of houses. Not objecting to the housing building but it should be conducted in a balanced way as stated in the original draft Local Plan.
125	Alexandra	Luo		Main	28		The housing numbers as proposed in the original draft Local Plan should be reinstated.			Objection raised to the large increase in the number of houses proposed to be built in Cherwell as a result of the Oxfordshire Strategic Housing Market Assessment (SHMA). The Plan suggests that within 20 years there would be a massive increase in the number of houses built in the Cherwell district. This will alter the region, impact on the village community, the unique environment and surrounding farmland as well as the future facilities for the next generation such as provision of public services and transport networks. The growth of housing will have the effect of reducing the quality of life for existing residents and the already squeezed natural environment. The Plan is not future proofing the area either socially or environmentally against the ills of monolithic town planning. The Plan is simply aiming to fill the needs of an overstated housing demand and not investing in healthy social communities and their environment. There are many objections to SHMA based on the fact that the scheme is aiming to congest the area with building a staggering number of houses before the infrastructure can cope with it. Housing should be rolled out in a sensible way that promotes a balanced approach of land use and population throughout the UK.
127	Christopher	Norrige		Main	28					Objection raised to the large increase in the number of houses proposed to be built in Cherwell as a result of the Oxfordshire Strategic Housing Market Assessment (SHMA). The Plan would increase the total number of houses in Cherwell by 40% in 17 years which is far too much. There is no mention of a new reservoir or an upgrade of the A34 which is already above capacity. Need to retain the Green Belt, both for wildlife and recreation. Kidlington should remain separate from Oxford City and the Green Belt between the village and the city should also remain, this too is very important for local residents.

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185	Mark and Pauline	Rushby		Main	28		The much lower housing numbers as proposed in the original draft Local Plan should be reinstated.			Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40% in just 17 years, with even more to be added as 'overspill' from Oxford. The level of growth is unrealistic and simply unbelievable. Concerned about the irreversible impact it will have on the environment and the countryside. Cannot see how the road network or public services can cope with the levels of population increase envisaged. The SHMA has been seriously criticised by individuals, organisations, experts, local politicians and MPs. A report from an independent planning expert concludes that the SHMA's estimate is likely to be 'grossly overstated' by a factor of over two.
199/3	Huw	Mellor	Kemp & Kemp / Mano Oak Homes	Main	28			Supports the requirement of further development in the rural areas and the acknowledgement of increased housing targets, as identified in the Oxfordshire SHMA.		
017/1	Anthony and Pauline	Wagg		Main	28		The much lower housing numbers as proposed in the previous Plan should be reinstated.		No comment	Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40%, a figure that is not supported by any evidence. There could be even more homes to be built in order to meet the needs of Oxford City Council. The District will not be able to cope with this level of growth and there will be negative impact on the countryside. The existing road network is over-stretched and public services will struggle to meet such a great increase in demand. The SHMA has been extensively criticized by individuals, organisations, experts, local politicians and MPs. A critical report was commissioned by CPRE which concluded that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two. No response received to these criticisms or any attempt to independently review the SHMA.
018/1	Jeremy	Hayward		Main	28		The much lower housing numbers as proposed in the previous Plan should be reinstated.		No comment	Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40%. The District will not be able to cope with this level of growth and there will be negative impact on the environment. The existing road network is over-stretched and in generally poor condition. Current public transport in rural villages is inadequate and there seems to be no plan to expand and improve public services, especially schools. The SHMA has been extensively criticized by individuals, organisations, experts, local politicians and MPs. A critical report was commissioned by CPRE which concluded that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two. No response received to these criticisms or any attempt to independently review the SHMA.

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020/1	Michael and Sylvia	Davy		Main	28		The much lower housing numbers as proposed in the previous Plan should be reinstated.		No comment	Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40% which is totally inappropriate and unjustifiable. There could be even more homes to be built in order to meet the needs of Oxford City Council. Rural communities should not have developments imposed on them by Oxford City Council. The District will not be able to cope with this level of growth and there will be negative impact on the environment, traffic congestion and the strain on local services and amenities and the countryside. Existing road network is over-stretched in many places and public services will struggle to meet such a great increase in demand. Recent developments in Bloxham have received no consideration of their negative impact on the village and are widely opposed by the majority of the villagers. The SHMA has been extensively criticized by individuals, organisations, experts, local politicians and MPs. A critical report was commissioned by CPRE which concluded that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two. No response received to these criticisms or any attempt to independently review the SHMA.
021/1	Henri	Papenfus		Main	28		The much lower housing numbers as proposed in the previous Plan should be reinstated.		No comment	Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40%, a figure to be totally unrealistic. There could be even more homes to be built in order to meet the needs of Oxford City Council. The District will not be able to cope with this level of growth and there will be negative impact on the environment, quality of life and the countryside. The existing road network is over-stretched in many places, and public services will not meet such a great increase in demand. The SHMA has been extensively criticized by individuals, organisations, experts, local politicians and MPs. A critical report was commissioned by CPRE which concluded that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two. No response received to these criticisms or any attempt to independently review the SHMA.
022/1	Gary and Louise	Crone		Main	28		The much lower housing numbers as proposed in the previous Plan should be reinstated.		No comment	Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40%, a figure to be astounding. There could be even more homes to be built in order to meet the needs of Oxford City Council. The District will not be able to cope with this level of growth and there will be negative impact on the environment, quality of life and the countryside. The existing road network is over-stretched in many places, and public services will not meet such a great increase in demand. The SHMA has been extensively criticized by individuals, organisations, experts, local politicians and MPs. A critical report was commissioned by CPRE which concluded that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two. No response received to these criticisms or any attempt to independently review the SHMA.

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023/1	Paul	Webb		Main	28		The much lower housing numbers as proposed in the previous Plan should be reinstated.		No comment	Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40%, a figure to be staggering. There could be even more homes to be built in order to meet the needs of Oxford City Council. The District will not be able to cope with this level of growth and there will be negative impact on the environment and the countryside. The existing road network is over-stretched and public services will not be able to meet such a great increase in demand. The SHMA has been extensively criticized by individuals, organisations, experts, local politicians and MPs. A critical report was commissioned by CPRE which concluded that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two. No response received to these criticisms or any attempt to independently review the SHMA.
024/1	Catherine	Grebenik		Main	28		The much lower housing numbers as proposed in the previous Plan should be reinstated.		No comment	Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40%. There could be even more homes to be built in order to meet the needs of Oxford City Council. The District will not be able to cope with this level of growth and there will be negative impact on the environment and the countryside. The existing road network is over-stretched and public services will not be able to meet such a great increase in demand. Other services like sewerage will also be unable to cope with the increase in use. The SHMA has been extensively criticized by individuals, organisations, experts, local politicians and MPs. The SHMA is based on aspirational and unrealistic levels of economic growth. A report from an independent planning expert concludes that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two. No response received to these criticisms or any attempt to independently review the SHMA.
025/1	Steven	Daggitt		Main	28		The much lower housing numbers as proposed in the previous Plan should be reinstated.		No comment	Objection raised on the forecasts of housing need from the 2014 SHMA. The adoption of the increased housing numbers recommended in the SHMA makes the plan unsound because the SHMA is based on unrealistically large levels of economic growth. A report from an independent planning expert concludes that the SHMA's estimate is likely to be 'grossly overstated' by a factor of over two. No response received to these criticisms or any attempt to independently review the SHMA. The huge increase in housing numbers proposed will completely swamp existing infrastructure in Cherwell District making the plan ineffective.
030/1	Jonathan	Cole		Main	28		The much lower housing numbers as proposed in the previous Plan should be reinstated.			Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40%, a figure to be staggering. There could be even more homes to be built in order to meet the needs of Oxford City Council. The District will not be able to cope with this level of growth and there will be negative impact on the environment and the countryside. The existing road network is over-stretched, and public services will not meet such a great increase in demand. The SHMA has been extensively criticized by individuals, organisations, experts, local politicians and MPs. A critical report was commissioned by CPRE which concluded that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two. No response received to these criticisms or any attempt to independently review the SHMA.

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032/1	Andrew	McCallum		Main	28		The much lower housing numbers as proposed in the previous Plan should be reinstated.			Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40%, a figure that is not supported by any evidence. There could be even more homes to be built in order to meet the needs of Oxford City Council. The District will not be able to cope with this level of growth and there will be negative impact on the countryside. The existing road network is over-stretched and public services will struggle to meet such a great increase in demand. The SHMA has been extensively criticized by individuals, organisations, experts, local politicians and MPs. A critical report was commissioned by CPRE which concluded that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two. No response received to these criticisms or any attempt to independently review the SHMA.
033/1	Ora	Sapir		Main	28		The much lower housing numbers as proposed in the previous Plan should be reinstated.			The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40%. There could be even more homes to be built in order to meet the needs of Oxford City Council. The District will not be able to cope with this level of growth and there will be negative impact on the environment and the countryside. The existing road network is over-stretched and public services will not be able to meet such a great increase in demand. Other services like sewerage will also be unable to cope with the increase in use. The SHMA has been extensively criticized by individuals, organisations, experts, local politicians and MPs. The SHMA is based on aspirational and unrealistic levels of economic growth. A report from an independent planning expert concludes that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two. No response received to these criticisms or any attempt to independently review the SHMA.
033/2	Ora	Sapir		Main	28		The much lower housing numbers as proposed in the previous Plan should be reinstated.			The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40%. There could be even more homes to be built in order to meet the needs of Oxford City Council. The District will not be able to cope with this level of growth and there will be negative impact on the environment and the countryside. The existing road network is over-stretched and public services will not be able to meet such a great increase in demand. Other services like sewerage will also be unable to cope with the increase in use. The SHMA has been extensively criticized by individuals, organisations, experts, local politicians and MPs. The SHMA is based on aspirational and unrealistic levels of economic growth. A report from an independent planning expert concludes that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two. No response received to these criticisms or any attempt to independently review the SHMA.

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035/1	Luthfer	Rahman		Main	28		Lower housing numbers as proposed in the original draft local plan should be reinstated.			Objection to Modifications no. 28 and 34 relating to Policy BSC1, the Oxfordshire SHMA and Housing Allocations and to all other modifications based on the SHMA. The total number of houses in Cherwell would increase by 40%, a figure I consider to be staggering. I also understand that even more houses are likely to be proposed in order to meet the supposed needs of the City of Oxford. Such a level of growth is not credible or realistic which means that the plan will be ineffective. Impact on the environment, countryside and road network. SHMA It is based on aspirational and unrealistic levels of economic growth. A report from an independent planning expert concludes that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two.
042/1	Chris	Stevens		Main	28		The much lower housing numbers in the original draft local plan are reinstated.			Objects to increase in the number of houses proposed to be built in Cherwell as a result of the Oxfordshire Strategic Housing Market Assessment (SHMA). I understand that the plan would increase the total number of houses in Cherwell by 40% in just 17 years, with even more to be added as 'overspill' from Oxford. I consider this level of growth to be unrealistic and simply unbelievable. I am very concerned about the irreversible impact it will have on the environment and the countryside. A report from an independent planning expert concludes that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two.
043/1	Wendy	Castle		main	28					Proposed increase in the number of houses proposed to be built in Cherwell will result in a large urban sprawl with loss of the individuality of Oxfordshire's villages and will overwhelm the present road network and public services.
044/1	Bridget Richard	Atkins Clarke		Main	28					Object to increase in houses proposed in 2014 SHMA's by 40% in 17 years with even more to be added as "overspill" from Oxford. We consider this level of growth to be completely unrealistic and unacceptable. We are very concerned about the irreversible impact this will have on the environment and the countryside. In peak times the roads between Cherwell area and Oxford or London are frequently gridlocked. At other times they are still unacceptably slow. There is also increased flooding occurring in many areas due to excessive development already over the years. A report from an independent planning expert concludes that the SHMA's estimate is likely to be "grossly overstated" by a factor of more than two.
048/1	J and L	Pilgrim		Main	28					Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40%, a figure to be staggering. There could be even more homes to be built in order to meet the needs of Oxford City Council. The District will not be able to cope with this level of growth and there will be negative impact on the environment and the countryside. The existing road network is over-stretched, and public services will not meet such a great increase in demand. The SHMA has been extensively criticized by individuals, organisations, experts, local politicians and MPs. A critical report was commissioned by CPRE which concluded that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two. No response received to these criticisms or any attempt to independently review the SHMA. The much lower housing numbers as proposed in the previous Plan should be reinstated.

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052/1	Ian	Scargill	Oxford Green Belt Network	Main	28		The much lower housing numbers in the original draft local plan are reinstated.			The Plan now proposes that 22,700 houses should be built in Cherwell between 2011 and 2031, at an average rate of 1140 houses per year. This compares with 670 in the original draft plan, an increase of 70%. Such rates of growth are simply unbelievable. We therefore consider the plan to be ineffective. It would have disastrous consequences for the natural environment, the countryside, transport networks and public services. We also refer to the report of the independent planning consultant Prof. Alan Wenban-Smith who has conducted an in-depth examination of the SHMA and its assumptions. In particular he states that: the SHMA housing need figures are more than two and a half times what the Government's official household projections would suggest and must therefore be highly questionable. The SHMA makes many dubious adjustments to official statistics which add over 20,000 houses to its forecast of need for Oxfordshire. Overall this report concludes that the SHMA's estimate of housing need is likely to be "grossly overstated" by a factor of over two.
052/2	Ian	Scargill	Oxford Green Belt Network	Main	28		Modification 62 should be deleted together with all references to the Green Belt Review around Kidlington to meet local housing need.			We object to the proposed change to Policy ESD14 stating that "A small scale local review of the Green Belt boundary around reasons: The Local Plan itself (Para B253) states that the "Oxford Green Belt was designated to restrain development pressures which could damage the character of Oxford City and its heritage through increased activity, traffic and the outward sprawl of the urban area. We consider therefore that removing land from the Green Belt for the specific purpose of releasing sites to meet supposed housing need, as proposed by this modification, is contrary to national policy. We note that the Kidlington Masterplan is cited as evidence for this proposed change in policy. However this plan has not been published, nor has there been any general public consultation on it. We therefore consider the plan to be not justified. We do not believe that any new housing built on Green Belt Land can be limited to meeting "local need". Rather, it is highly likely that such housing will simply be used to contribute to meeting the housing requirement as assessed by the SHMA, which we have already argued is excessive (see previous representation). The policy is therefore not effective.
053/1	Mr and Mrs	Towler		main	28		The much lower housing numbers in the original draft local plan are reinstated.			We understand that the Plan now proposes that 22,700 houses should be built in Cherwell by 2031, many more than proposed in the original draft plan. The total number of houses in Cherwell would increase by 40%, a figure we consider to be shocking. We also understand that even more houses are likely to be proposed in order to meet the supposed needs of the City of Oxford. We do not believe that the District will be able to cope with this level of growth and we are very concerned about the impact it will have on the environment and the countryside and road network
054/1	Mr and Mrs J	Blunsden		Main	28		The much lower housing numbers in the original draft local plan are reinstated.			Objects to increase in the number of houses proposed to be built in Cherwell as a result of the Oxfordshire Strategic Housing Market Assessment (SHMA). I understand that the plan would increase the total number of houses in Cherwell by 40% in just 17 years, with even more to be added as 'overspill' from Oxford. I consider this level of growth to be unrealistic and simply unbelievable. I am very concerned about the irreversible impact it will have on the environment and the countryside. A report from an independent planning expert concludes that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two.

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060/1	Louis	Borucki		Main	28		The much lower housing numbers in the original draft local plan are reinstated.			Objects to increase in the number of houses proposed to be built in Cherwell as a result of the Oxfordshire Strategic Housing Market Assessment (SHMA). I understand that the plan would increase the total number of houses in Cherwell by 40% in just 17 years, with even more to be added as 'overspill' from Oxford. I consider this level of growth to be unrealistic and simply unbelievable. I am very concerned about the irreversible impact it will have on the environment and the countryside. A report from an independent planning expert concludes that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two.
082/1	Michael	Hurst		Main	28	Adverse impacts cited: loss of farming land; urbanisation of the rural part of the district; increase congestion and air pollution; reduce ability to impact upon water environment; inadequate water supply.	Use the lower housing figures and development from the within the original draft plan.			
083/1	M. J.	Moore		Main	28	SHMA unsound; irreversible impact upon the environment and countryside; impact upon the highway network and public services.	Reinstate the much lower housing figures from the original draft local plan.			
084/1	J	Huck		Main	28	SHMA unsound; irreversible impact upon the environment and countryside; impact upon the highway network and public services.	Reinstate the much lower housing figures from the original draft local plan.			
085/1	J	Huck		Main	28	SHMA unsound; irreversible impact upon the environment and countryside; impact upon the highway network and public services.	Reinstate the much lower housing figures from the original draft local plan.			
087/1	Dennis	Price		Main	28					Undue weight being given to SHMA together with inadequate public consultation
088/1	Henning	Sthamer		Main	28	SHMA unsound; irreversible impact upon the environment and countryside; impact upon the highway network and public services.	Reinstate the much lower housing figures from the original draft local plan.			
090/1	Fred	Taylor		Main	28	District cannot cope with level of growth proposed. Impact on environment, public services and road network. SHMA figures are unreliable.	Use lower housing figures from the Submission Version.			
091/1	Peter	Jay		Main	28	Object to high, unjustified housing numbers. Concern about Impact on countryside, the environment and community. The SHMA is flawed.	Use lower housing figures from the Submission Version.			
092/1	Philip	Blackman		Main	28	SHMA data is unreliable. Scale of growth envisaged is unrealistic. Concern about impact on countryside, environment, public services and road network.	Use lower housing figures from the Submission Version			
094/1	A R	Turner		Main	28	SHMA data is unreliable. Scale of growth envisaged is unrealistic. District cannot cope with level of growth proposed. Impact on environment, countryside, public services and road network.	Use lower housing figures from the Submission Version			
095/1	W	Keppie		Main	28	SHMA data is unreliable. Scale of growth envisaged is unrealistic. District cannot cope with level of growth proposed. Impact on environment, countryside, public services and road network.	Use lower housing figures from the Submission Version			
097/3	Sue	Mackrell	Bicester Town Council	Main	28	Accept the need to increase housing numbers and bring forth delivery programmes as a response to requirements identified in the SHLAA but question the impact of Oxford City housing need on the District housing numbers. Would like to be assured that sufficient health care facilities will be provided to cater for the increased number of residents that the additional housing will attract.				Crucial that growth of infrastructure keeps pace with housing growth.

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099/2	John and Laura	Wainwright		Main	28	The SHMA estimated need for a 40% increase in housing in Cherwell in 17 years is unrealistic. Any new housing built on Kidlington Green Belt land would be used to meet this inflated assessment rather than limited to meeting local need as the plan suggests. It would be an environmental crime to destroy Kidlington's beautiful countryside to satisfy the speculative housing needs of Oxford City.				
100/1	Nicholas	Mullineux		Main	28		The significantly lower housing numbers as proposed in the previous Plan should be reinstated.			Objects to increase in the number of houses proposed to be built in Cherwell as a result of the Oxfordshire Strategic Housing Market Assessment (SHMA). I understand that the plan would increase the total number of houses in Cherwell by 40% in just 17 years, with even more to be added as 'overspill' from Oxford. I consider this level of growth to be unrealistic and simply unbelievable. I am very concerned about the irreversible impact it will have on the environment and the countryside. A report from an independent planning expert concludes that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two.
102/1	Richard	Broadbent		Main	28					Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40%, a figure that is staggering. There could be even more homes to be built in order to meet the needs of Oxford City Council. It is not possible to find the significant funds for the infrastructure. In the economic circumstances of today, there is no chance of getting the capital to provide the facilities and services needed. Existing infrastructure and services would be overwhelmed. Existing roads cannot be kept in good repair. Schools are nearly full. The NHS is struggling to cope with the existing numbers. Journey times are already badly affected by the density of traffic. Understand the pressures on the council to accept the SHMA figures, to avoid starting the Local Plan process again. However, the only effect of accepting the housing figures in the SHMA will be that developers will continue to be able to pick any site to develop, without worrying about the Local Plan, because the five year supply will not be met, and there will therefore be a presumption in favour of any development.
103/1	Jeffrey	Wright	Begbroke Parish Council	Main	28		The much lower housing numbers proposed in the original draft local plan should be reinstated.			Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40%, a figure to be over ambitious. There could be even more homes to be built in order to meet the needs of Oxford City Council. The District or its residents will not be able to cope with this level of growth and are very concerned about the impact it will have on the environment. Particularly concerned that Green Belt reviews in Kidlington (Mod No.62) could impact on the Green Belt in Begbroke if Kidlington's local housing needs cannot be accommodated within the built up area. Also concerned about Mod No.304 regarding the indicative boundaries of London-Oxford Airport and Begbroke Science Park also impacting on the Green Belt. The existing road network is already over-stretched in many places, and public services such as the S3 and K2 will struggle to cope with the increased in demand. Oxfordshire County Council are continually undering funding pressure to maintain their existing road networks and facilities. The SHMA has been extensively criticised by individuals, organisations, experts, local politicians and MPs.

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104/1	Alan and Jane	Womack		Main	28		The much lower housing numbers proposed in the original draft local plan should be reinstated.			Objection raised on the large increase in the number of houses proposed to be built in Cherwell as a result of the Oxfordshire Strategic Housing Market Assessment (SHMA). The total number of houses in Cherwell would increase by 40% in just 17 years, with even more to be added as 'overspill' from Oxford. This level of growth is unrealistic and unbelievable. Concerned about the irreversible impact it will have on the environment and the countryside. The road network and public services will not struggle to cope with the levels of population increase envisaged. The SHMA has been seriously criticised by individuals, organisations, experts, local politicians and MPs. A report from an independent planning expert concludes that the SHMA's estimate is likely to be 'grossly overstated' by a factor of over two.
108/2	R	Phipps		Main	28		The much lower housing numbers as proposed in the original draft Local Plan should be reinstated.			Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40% in 17 years, with even more to be added as 'overspill' from Oxford. The growth is unrealistic and simply unbelievable. Concerned about the irreversible impact it will have on the environment and the countryside. The existing road network and public services will struggle to cope with the levels of population increase envisaged. The SHMA has been extensively criticised by individuals, organisations, experts, local politicians and MPs. A critical report from an independent planning expert concludes that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two.
110/2	Martin and Pamela	Palmer		Main	28		The much lower housing numbers as proposed in the original draft Local Plan should be reinstated.			Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40% in 17 years, with even more to be added as 'overspill' from Oxford. The growth is unrealistic and simply unbelievable. Concerned about the irreversible impact it will have on the environment and the countryside. The existing road network and public services will struggle to cope with the levels of population increase envisaged. The SHMA has been extensively criticised by individuals, organisations, experts, local politicians and MPs. A critical report from an independent planning expert concludes that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two.
112/1	David	Payne		Main	28		The much lower housing numbers as proposed in the original draft Local Plan should be reinstated.			Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40% in 17 years, with even more to be added as 'overspill' from Oxford. The growth is unrealistic and unbelievable. Concerned about the irreversible impact it will have on the environment and the countryside. The existing road network and public services will struggle to cope with the levels of population increase envisaged. The SHMA has been extensively criticised by individuals, organisations, experts, local politicians and MPs. A critical report from an independent planning expert concludes that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two.

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121/1	Roger	Prince		Main	28		The much lower housing numbers as proposed in the original draft Local Plan should be reinstated.			Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40% in 17 years. There could be even more homes to be built in order to meet the needs of Oxford City Council. The SHMA was prepared without any consultation, contains many questionable assumptions to which its forecasts are highly sensitive. It has not been subjected to any independent validation or quality assurance. Several council leaders, MPs, organisations and experts have criticised the SHMA. An independent planning expert has concluded that the estimated figures in the SHMA are likely to be 'grossly overstated' by a factor of over two.
121/1	Roger	Prince		Main	28		The much lower housing numbers as proposed in the original draft Local Plan should be reinstated.			Cont.....The only people who seem still to be giving the SHMA any credibility are the commercial property consultants who prepared it, property developers and landowners who sees an opportunity to make some significant profits and, regrettably, some members of the local councils. The fact that the Inspector has accepted the figures should be no barrier to local politicians disputing the validity of the SHMA on behalf of the people they represent. The SHMA is wildly unrealistic and unbelievable. It will have a detrimental impact on the environment and the countryside. The road network and public services will struggle to cope with the envisaged increase to the local population.
123/1	Andrew	Smith	Hampton Gay and Poyle Parish Meeting	Main	28		The housing numbers as proposed in the original draft Local Plan should be reinstated.			The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would be over 40% of the current levels by 2031. Local infrastructure - roads, public services will become over stretched and unable to handle such huge growth. Concerned about how the countryside and environment will be affected. Hampton Poyle is near to the Green Belt between Oxford and Kidlington and no doubt the Plan will increase pressure on this precious space. Aware that CPRE have engaged professional help to study the basis of the SHMA on which the Plan is based. These studies cast serious doubt on how the SHMA calculates housing need, relative to official government projections and forecasts for new job creation, resulting in a huge overestimate of housing need in Oxfordshire. The SHMA should be independently reviewed.
124/1	Margaret	Harris		Main	28		The much lower housing numbers as proposed in the original draft Local Plan should be reinstated.			Objection raised to the large increase in the number of houses proposed to be built in Cherwell as a result of the Oxfordshire Strategic Housing Market Assessment (SHMA). The Plan would increase the total number of houses in Cherwell by 40% in 17 years, with even more to be added as 'overspill' from Oxford. Concerned about the irreversible impact this increase in housing density will have on the environment and the countryside. The existing road network and public services will struggle to cope with the levels of population increase envisaged. The roads to the south of Kidlington are already at gridlock in the morning rush hour and it can take an hour to get to the centre of Oxford. The opening of the Oxford Parkway station will impose even greater demands in the road system.

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126/1	Nicky and Patrick	Forsythe		Main	28		The much lower housing numbers as proposed in the original draft Local Plan should be reinstated.			Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40%, a figure to be considered staggering. There could be even more homes to be built in order to meet the needs of Oxford City Council. The District will not cope with this level of growth and concerned about the impact it will have on the environment and the countryside. The road network is already over-stretched, and public services will struggle to meet such a great increase in demand. The SHMA has been extensively criticised by individuals, organisations, experts, local politicians and MPs. It is based on aspirational and unrealistic levels of economic growth. A report from an independent planning expert concludes that the SHMA's estimate is likely to be 'grossly overstated' by a factor of over two. There is not a response to these criticisms.
128/1	Albert and Ann	Prior		Main	28		The housing numbers as proposed in the original draft Local Plan should be reinstated.			Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40%. There could be even more homes to be built in order to meet the needs of Oxford City Council. This would undoubtedly have a very significant impact on the countryside, the road network and the general environment.
129/1	Linda	Ward		Main	28		The much lower housing numbers as proposed in the original draft Local Plan should be reinstated.			Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40% in just 17 years. There could be even more homes to be built in order to meet the needs of Oxford City Council. The level of growth is unrealistic and simply unbelievable. Concerned about the irreversible impact it will have on the environment and the countryside. Cannot see how the road network or public services can cope with the levels of population increase envisaged. The SHMA has been seriously criticised by individuals, organisations, experts, local politicians and MPs. A report from an independent planning expert concludes that the SHMA's estimate is likely to be 'grossly overstated' by a factor of over two.
130/1	Robert	McGurrin	Woodstock Action Group	Main	28	SHMA projections are overstated and have not been held to account by public consultation or examination	Re-instatement of the more realistic housing numbers contained in CDC's original draft Local Plan			The representor objects to all modifications based on the SHMA as they are based on dubious housing need forecasts contained in the 2014 SHMA, which have not been held to account by public consultation or independent examination. Public services, the local network of roads and highways and environmental habitats will not be able to cope with this amount of growth.
132/1	Philippa	Mullineux		Main	28		Re-instatement of the significantly lower housing numbers proposed in the original draft.			The level of growth is unrealistic and will have an irreversible impact on the environment and countryside. The road network and public services will not be able to cope with the increase. The SHMA has been seriously criticised with need overstated by a factor of 2.
133/1	Roger	Davies		Main	28	No robust evidence to justify the increase in housing numbers; the SHMA has been extensively criticised, is based on unrealistic levels of growth and its projections are overstated.		0		The representor objects to all modifications based on the 2014 SHMA. The level of growth is unrealistic. Road infrastructure, public services and the environment will not cope with the additional growth. The areas identified are already prone to flooding.
134/1	Grant	Haly		Main	28	The SHMA has been seriously criticised and its projections are likely to be grossly overstated.	Re-instatement of the significantly lower housing numbers proposed in the original draft.			The representor objects to all modifications based on the 2014 SHMA. The level of growth is unsustainable. Road infrastructure and public services will not cope with the additional growth. Concerned over the irreversible impact on the environment and countryside and the affect on the lives of the next generation.

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135/1	Jane	Rendle		Main	28	The SHMA has been seriously criticised and its projections are likely to be grossly overstated.	Re-instatement of the significantly lower housing numbers proposed in the original draft.			The representor objects to all modifications based on the 2014 SHMA. The level of growth is unsustainable. Road infrastructure and public services will not cope with the additional growth. There would be a catastrophic impact on the environment and countryside.
136/1	Sheila	Churchill		Main	28					The representor objects to modification 28 and all others concerning the 2014 SHMA. Too many houses are proposed in an already crowded area, this would have a bad effect on local infrastructure and stable population from the influx of people, traffic problems would worsen during construction and completion, and there would be large adverse effects on the environment.
139/1	John	Batchelor		Main	28		The much lower housing numbers as proposed in the original draft Local Plan should be reinstated.			Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40% in just 17 years with further growth identified as 'overspill' from Oxford. The roads and public services will not be able to cope with the levels of population increase envisaged, and will lead to permanent and irreversible damage to the environment and the countryside. The SHMA has been seriously criticised and the SHMA's estimate is likely to be grossly overstated.
146/1	Susan	Rivers		Main	28					Objection raised on the forecasts of housing need from the 2014 SHMA. The land is concerned is enjoyed by residents and the countryside should be preserved at all costs for future generations. Understand Green Belt was a permanent designation. Concerned by the impact more traffic would have on The Moors where more houses are already being built.
147/1	Anthony	McMullan		Main	28		The much lower housing numbers as proposed in the original draft Local Plan should be reinstated.			Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40% in just 17 years. There could be even more homes to be built in order to meet the needs of Oxford City Council. The level of growth is unrealistic and simply unbelievable. Concerned about the irreversible impact it will have on the environment and the countryside. Cannot see how the road network or public services can cope with the levels of population increase envisaged. The SHMA has been seriously criticised by individuals, organisations, experts, local politicians and MPs. A report from an independent planning expert concludes that the SHMA's estimate is likely to be 'grossly overstated' by a factor of over two.
148/1	Mr and Mrs A.	Biskup		Main	28		The much lower housing numbers as proposed in the original draft Local Plan should be reinstated.			Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40% in just 17 years. There could be even more homes to be built in order to meet the needs of Oxford City Council. The level of growth is unrealistic and simply unbelievable. Concerned about the irreversible impact it will have on the environment and the countryside. Cannot see how the road network or public services can cope with the levels of population increase envisaged. The SHMA has been seriously criticised by individuals, organisations, experts, local politicians and MPs. A report from an independent planning expert concludes that the SHMA's estimate is likely to be 'grossly overstated' by a factor of over two.
150/1	Fiona	Thomas		Main	28	Objects to modifications based on the SHMA. 22,700 homes represents a 40% increase. Will impact massively on local infrastructure and have a negative effect on people's lives. The SHMA estimate is likely to be grossly overstated.	The original, much lower, housing numbers, should be reinstated.			

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163/1	John	Broad		Main	28		Review of the revised SHMA figures, as carried out by CPRE consultants should be agreed			SHMA figures are out by a factor of at least two. As I have not seen any discussion, debate or questioning by Councils or the Inquiry, I consider the basic premise for the review of the Cherwell Local Plan to be unsound. figures produced do not have any evidence.
164/16	Sarah	Smith	Rapleys LLP / Pandora Trading Ltd	Main	28			The overall housing figures proposed in the Modifications are generally supported, in the context that the proposed increase does now meet the objectively assessed needs of the District. The proposed increase in overall housing numbers is to be managed through the distribution strategy as originally proposed, i.e., concentration of development at Banbury and Bicester with limited increase within the remainder of the district. This is also supported.	Not in relation to these particular modifications. Comments are provided in respect of the Sustainability Appraisal under separate representation.	
166/1	Helen	Marshall	CPRE Oxfordshire	Main	28	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Local Plan should return to the figures and strategy as outlined in the original Submission Document (31 Jan 2014).			The SHMA housing need figures are more than two and a half times those suggested by the Government's own official household projections. The SHMA makes many dubious adjustments to official statistics which add over 60,000 houses to its forecast of need for Oxfordshire. Much of the forecast of need is based on another forecast that 85,000 new jobs will be created attracting more people to move to the County. However much of this figure seems itself just to be based on aspirations to develop more commercial property and it has not been subject to public consultation. The outcome of such a flawed process cannot be accepted as an 'objective assessment of housing need' and over-allocation would present a significant risk to greenfield land. These criticisms have been shared with Cherwell District Council but we are not aware of any reasoned response or any attempt to independently review the SHMA.
166/1	Helen	Marshall	CPRE Oxfordshire	Main	28	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Local Plan should return to the figures and strategy as outlined in the original Submission Document (31 Jan 2014).			Cont.....In recent Planning Inspectorate report(S62A/2014/0001) the Inspector notes 'how essential it is that evidence such as SHMAs must be rigorously tested in order to establish that it is robust' and questions the need to take into account the 'aspirational employment growth' of the Local Enterprise Partnership'. CPRE Oxfordshire therefore considers that the plan is unsound because it is not justified by robust evidence and request that the much lower housing numbers as proposed in the original draft local plan are reinstated.
169/1	Anthony	Churchill		Main	28		lower housing numbers in the original draft local plan be reinstated.			The proposed increase in the Cherwell area cannot be supported by the current road network. The A34 is particularly unreliable with frequent disruptions. The Oxford ring road is also near capacity with consequential disruption of the A34. The local services will also be overloaded.
170/1	Susan	Dunn		Main	28		The much lower housing numbers in the original draft local plan are reinstated.			Objects to increase in the number of houses proposed to be built in Cherwell as a result of the Oxfordshire Strategic Housing Market Assessment (SHMA). I understand that the plan would increase the total number of houses in Cherwell by 40% in just 17 years, with even more to be added as 'overspill' from Oxford. I consider this level of growth to be unrealistic and simply unbelievable. I am very concerned about the irreversible impact it will have on the environment and the countryside. A report from an independent planning expert concludes that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two.

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171/1	David	Yates		Main	28		request that the much lower housing numbers as proposed in the original draft local plan and based on DCLG population projections, are reinstated			The proposed target for Cherwell would be increased by 40%, a figure that would be unachievable given the current economic climate and recent track record of actual house building delivery by Developers in the District. Infrastructure within Cherwell District would be unable to cope with this level of growth and the negative environment impact would be substantial. The provision of school facilities in rural areas are now unable to meet the local demand as a consequence of inappropriate, unplanned (but won at appeal) developments on productive agricultural fields. The SHMA has been extensively criticised by individuals, organisations, experts, local politicians and MPs. Prof. Alan Wenban-Smith has indicated that: The SHMA housing need figure is more than two and a half times what the Government's official household projections would suggest, making it highly questionable. However much of this figure seems to be based on aspirations to develop more commercial property and it has not been subject to public consultation or independent scrutiny.
173/1	Mr&Mrs M	Prosser		Main	28		The much lower housing numbers in the original draft plan be reinstated.			In Cherwell the housing is to be increased by 40% in a short space of time. This is totally unrealistic. The impact on the countryside and environment is colossal and unreasonable. Public services and particularly the road network would not be able to cope.
174/1	Jayne	Gordon	Hanwell Parish Council	Main	28		We ask the District Council not to accept these figures as targets but to give due consideration to what can be achieved in a sustainable way to meet local need and protect our local environment			As a result of the SHMA small villages in Oxfordshire, like Hanwell face the prospect of increasing in size by a third in less than 20 years such is the scale of what is being proposed. Such rapid growth would clearly have a massive impact on our countryside, not to mention putting pressure on already over-stretched infrastructure such as schools, roads, GPs. Assumptions behind the SHMA are unsound, The assumptions of future population growth are also highly speculative and unrealistic. Even at the height of the housing boom, Oxfordshire was only delivering around 3,000 houses a year. The SHMA figures suggest 5,000 houses a year. Unfortunately, if these figures are accepted and then targets are missed in the future, then the Council will risk losing its 5 Year Housing Supply and the planning free-for-all that we are already seeing. Oxford City Council is already using the proposed increase in its own figures (up by 20,000) as a reason to seek a delay in Cherwell District Council bringing forward its Local Plan. The implication is that further sites should be allocated within Cherwell to accommodate overspill from the City, including in the Green Belt.
178/1	Suzanne	Bangert	Terrance O'Rurke / Mr & Mrs Ashworth	Main	28		Support increase in housing provision and early review of local plan. Under the proposed modification Kidlington and the rural areas will only accommodate 17% of the housing growth, compared to 19% in the submitted plan. Small scale development should be facilitated at the villages to meet localized need. The modified plan does not represent positive planning and is contrary to the NPPF. 2170 dwellings are required in the rural areas		The SA provides no justification for the revised distribution, and no evidence to the position that increased development at former RAF Upper Heyford will meet rural needs.	
180/1	Sally	Atkins		Main	28					Objects to increase in the number of houses proposed to be built in Cherwell as a result of the SHMA. I understand that the plan would increase the total number of houses in Cherwell by 40% in just 17 years, with even more to be added as 'overspill' from Oxford. I consider this level of growth to be unrealistic. I am very concerned about the irreversible impact it will have on the environment and the countryside. A report from an independent planning expert concludes that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two. there is also increased flooding occurring due to excessive development.

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181/1	Lyn	Richards		Main	28		The much lower housing numbers as proposed in the original draft Local Plan should be reinstated.			Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The district will not be able to cope with the population increase envisaged and concerned about the impact this will have on the environment and the countryside. Cannot see how the road network or public services can cope with this great demand. The busy journey from Kidlington to Oxford could take up to 60 minutes to travel 7 miles which will worsen if further developments are to take place.
182/1	Mark and Natalie	Wallace		Main	28		There has not been local housing needs assessment undertaken recently to properly assess the quantity of new houses required. This needs to be undertaken before any further developments go ahead.			Objection raised to the proposal for a possible local review of the Green Belt boundary around Kidlington and to the large number of houses proposed to be built in Cherwell. Understand there is a huge shortfall of housing for people and more houses are needed however the impact it will have on the traffic congestion through Kidlington is a concern. Currently takes up to 30 minutes to travel 2 miles through Kidlington. Congestion is likely to be worse with the opening of the new railway station at Water Eaton.
184/1	John and Pam	Roberts		Main	28		Request that the housing numbers are re-examined after collecting more reliable data and that lower figures, more in accord with the Government's official household projections, are used.			Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40% which will cause social and environmental disturbance. Building on greenfield land would reduce the potential of land to produce food, impact negatively on the natural environment and damaging the quality of the landscape. There has been no public consultation on the housing figures in the Local Plan, nor the SHMA. A report from an independent planning expert concludes that the SHMA's estimate is likely to be 'grossly overstated' as it is more than two and a half times what the Government's official household projections are.
186/1	Rob	Kinchin-Smith	Banbury Civic Society	Main	28					Objection raised on the forecasts of housing need from the 2014 SHMA due to the following reasons: 1) The complete lack of any local or county-wide public consultation or input; 2) The household projections in the SHMA are a wholesale replacement rather than an adjustment to the official base. At 2.7 times the official government projections, the SHMA numbers are not a reasonable adjustment to official figures; 3) The Local Plan process has been pre-empted by the sheer scale of the housing projections in the SHMA and the fact that the figures have been prepared without consideration of the environmental implications or infrastructure requirements. The increased housing requirements means that most Oxfordshire Districts will fail to meet the post-SHMA delivery rate, resulting in lasting damage to the planning process in Oxfordshire.
186/1	Rob	Kinchin-Smith	Banbury Civic Society	Main	28					Cont.....The Council should find sites within easy and sustainable commuting distance of Oxford and 'Science Vale' however the strategy of the Plan remains unchanged. All development remains targeted around Banbury and Bicester, with not even organic growth allowed for the villages, which still include Kidlington. Banbury will grow by more than 33% in fifteen years, with no additional infrastructure. The southern part of the district is more appropriate for new developments and not at Banbury, Bicester or Former RAF Upper Heyford.

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187/1	Alan	Hedges		Main	28		The much lower housing numbers as proposed in the original draft Local Plan should be reinstated.			Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The Submission Local Plan (Jan 2014) was sensible, and a serious attempt to provide a good balance between the need to provide more housing and the need to apply proper planning criteria for a rural area, with a mind to sustainability, transport, the character of communities and protection of the environment. The SHMA has not been subject to any consultation or independent examination, and the numbers it has come up with are manifestly absurdly high. A critical report from an independent planning expert concludes that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two. An error like this magnitude would clearly have a major bearing on housing numbers for the Plan, but there has not been an official response to the criticisms.
188/1	Martin and Jennifer	Gibson		Main	28		The much lower housing numbers as proposed in the original draft Local Plan should be reinstated.			Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40% in just 17 years, with even more to be added as 'overspill' from Oxford. The level of growth is unrealistic. Concerned about the irreversible impact it will have on the environment and the countryside. Cannot see how the road network or public services can cope with the levels of population increase envisaged. The SHMA has been seriously criticised by individuals, organisations, experts, local politicians and MPs. A report from an independent planning expert concludes that the SHMA's estimate is likely to be 'grossly overstated' by a factor of over two.
189/1	Nicholas	Todd		Main	28		The much lower housing numbers as proposed in the original draft Local Plan should be reinstated.			Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40% in just 17 years, with even more to be added as 'overspill' from Oxford. The level of growth is unrealistic. Concerned about the irreversible impact it will have on the environment and the countryside. Cannot see how the road network or public services can cope with the levels of population increase envisaged. The SHMA has been seriously criticised by individuals, organisations, experts, local politicians and MPs. A report from an independent planning expert concludes that the SHMA's estimate is likely to be 'grossly overstated' by a factor of over two.
191/6	Michael	Robson	Cerda Planning Ltd / CALA Homes (Midlands) Ltd	Main	28					The housing figure proposed makes no allowance for the housing needs of Oxford therefore not meeting the full objectively assessed need. Concerned that the evidence from the SHMA in respect of meeting Oxford's housing needs have not been taken forward in the Main Modifications. It is expected that the Council will need to accommodate some of Oxford's unmet housing needs. New sites must be found, as such as land at Bicester, Deddington and Bloxham. The trajectory allows for no flexibility in meeting the housing figure. If any larger sites falls behind that indicated in the trajectory, or any of the identified sites do not come forward the housing figure will not be fulfilled. New settlements and large urban extensions could face deliverability challenges. Large strategic housing schemes will experience long lead-in times so they are not a short term or quick solution to housing land supply. This is usually as a result of new or major upgrades to surrounding infrastructure. Future rates of delivery will need to be realistic by considering the type of scheme, number of developers and how quickly developers can sell the homes built.

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192/1	Paul	Weaver		Main	28		The housing numbers as proposed in the original draft Local Plan should be reinstated.			Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The Submission Local Plan (Jan 2014) was sensible, and a serious attempt to provide a good balance between the need to provide more housing and the need to apply proper planning criteria for a rural area, with a mind to sustainability, transport, the character of communities and protection of the environment. The SHMA has not been subject to any consultation or independent examination, and the numbers it has come up with are extremely high. A critical report from an independent planning expert concludes that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two. An error like this magnitude would clearly have a major bearing on housing numbers for the Plan, but there has not been an official response to the criticisms.
194/1	Rachael	Blakey	Bucknell Parish Council	Main	28		The housing numbers as proposed in the original draft Local Plan should be reinstated.			Objects to increase in the number of houses proposed to be built in Cherwell as a result of the Oxfordshire Strategic Housing Market Assessment (SHMA). I understand that the plan would increase the total number of houses in Cherwell by 40%, with even more to be added as 'overspill' from Oxford. The District will not be able to cope with this level of growth and there are concerns about the impact it will have on the environment and the countryside. The road network around Bicester is already stretched and without the necessary and significant investment in this infrastructure the situation will only get worse. Concerned about the likely increased traffic flow which will inevitably occur on the Bicester - Ardley Road. The SHMA has been extensively criticised by individuals, organisations, experts, local politicians and MPs. A report from an independent planning expert concludes that the SHMA's estimate is likely to be 'grossly overstated' by a factor of over two.
198/2	Huw	Mellor	Kemp & Kemp / Newcore Capital Management	Main	28					Supports the requirement of further development in the rural areas and the acknowledgement of increased housing targets, as identified in the Oxfordshire SHMA.
208/3	Alice	Kirkham	Persimmon Homes and Charles Church Midlands	Main	28	Insufficient co-operation with Oxford City Council and other Oxfordshire authorities in meeting the county's housing needs. Fail to take account of the unmet housing needs of Oxford City. This should be considered now as any delay would lead to a larger backlog of housing need and will be even more difficult to meet.	The Plan should include a higher housing requirement following proper consultation of the appropriate share of Oxford City's housing needs that the district should meet.		The Sustainability Appraisal fails to assess the alternative of planning for a higher quantum of housing to meet some of the wider housing market area's needs (i.e. some of the unmet need from Oxford City).	
213/1	Shelley	Hopper		Main	28					Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40% in just 17 years. There could be even more homes to be built in order to meet the needs of Oxford City Council. The level of growth is unrealistic and simply unbelievable. Concerned about the irreversible impact it will have on the environment and the countryside. Cannot see how the road network or public services can cope with the levels of population increase envisaged.
214/1	K	Thomas		Main	28					Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40%. Cannot see how the road network or public services can cope with the levels of population increase envisaged. A critical report from an independent planning expert concludes that the SHMA's estimate is likely to be "grossly overstated" however there is still not a formal response to this.

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228/1	Ross	Avery		Main	28	Objects to the large increase in the number of houses proposed to be built in Cherwell as a result of the Oxfordshire Strategic Housing Market Assessment (SHMA). The plan would increase the total number of houses in Cherwell by 40% in just 17 years, with even more to be added as 'overspill' from Oxford. This level of growth is unrealistic and unbelievable. The objector is very concerned about the irreversible impact it will have on the environment and the countryside and cannot see how the road network or public services will be able to cope with the levels of population increase envisaged. The SHMA has been seriously criticised by individuals, organisations, experts, local politicians and MPs. A report from an independent planning expert concludes that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two.	The lower figures in the original draft Plan should be reinstated.			
230/1	Jenny	Yates		Main	28		Much lower housing numbers are reinstated in the Local Plan.			The proposed target for Cherwell would be an increase by 40%, a figure which would be unachievable given the current economic climate and recent track record of actual house building by developers in the District.
230/2	Jenny	Yates		Main	28					Infrastructure within Cherwell District would be unable to cope with this level of growth and the negative environmental impact would be substantial. The road network has been confirmed as over capacity as it passes through Bloxham. Traffic congestion is leading to high asthma rates.
230/3	Jenny	Yates		Main	28					Villages now have primary schools that are unable to offer places to their residents and children are having to commute to school.
230/4	Jenny	Yates		Main	28					The SHMA has been criticised by politicians, individuals, organisations, experts and local politicians. The SHMA figures are more than two and half times what the government official household projections would suggest, making it highly questionable.
230/5	Jenny	Yates		Main	28					The SHMA makes dubious adjustments to the official statistics which add over 20,000 homes to its forecasts of need for Oxfordshire
235/8	Simon	Gamage	RPS / Mr Bratt	Main	28					Supports the Council's proposals to meet its objectively assessed needs.
249/1	Judy	East		Main	28	Objects to modifications based on the SHMA. 22,700 homes represents a 40% increase. Unsustainable and will impact on quality of life, green space, wildlife habitats, road network and public services. Beggars belief that more houses are likely to be provided to meet Oxford's needs. The SHMA has been extensively criticised and has a need figure more than 2.5 times official household projections. It is based on the forecast that 85,000 new jobs will be created. The SHMA estimate is likely to be grossly overstated.	The original, much lower, housing numbers, should be reinstated.			
258/1	Craig	Barnes	Gladman Developments	Main	28				No comment	Pleased to observe that the main modifications reflect the Council's commitment to meet the full objectively assessed needs of the District. The Plan does not go far enough to guarantee a commitment to review the Plan and to consider the needs arising from its neighbouring authorities (including Oxford). The Oxfordshire authorities should seek to work together to ensure that the housing needs of the county can be fully accommodated.
279/1	S	Ryan		Main	28	The level of growth now proposed is unrealistic and will have an irreversible impact on the environment. The road network and public services will be unable to cope with the population increase. The SHMA has been seriously criticised by individuals, organisations, experts, local politicians and MPs. An independent planning expert concluded the SHMA estimate is likely to be overstated by a factor of 2.				

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280/1	V	Webster		Main	28	The increase in housing is a ridiculous amount and will be most damaging to the Green Belt which is so important to Kidlington. Fields behind the Moors and Webbs Way are precious to local people. 8 new properties are already being built in the Moors. The ex prison officer's club (now nursery), car park and tennis club next to Campsfield House are to be sold and if developed will be a loss for Kidlington residents.	The lower housing numbers contained in the original plan should be re-instated.			
281/1	Alison	Urwick		Main	28	The increase in housing is completely unsustainable in terms of its impact on the environment, communities, roads, water and other services including schools. The SHMA has been widely criticised and the housing need figure is more than two and a half times the government's official housing projections, making it highly questionable. The SHMA has not been subject to public consultation or independent scrutiny.	The lower housing numbers contained in the original plan should be re-instated.			
283/1	Ann	Taylor		Main	28	The increase in housing is unrealistic and the district could not cope with this level of growth; the road network and other services are already overstretched. The SHMA has been widely criticised and the housing need figure is likely to be overstated by a factor of two. The SHMA requires further scrutiny and public consultation before it can be accepted.	The much lower housing numbers proposed in the original draft local plan should be re-instated.			
288/1	Judy	Hall		Main	28	Objection is made to the large increase in housing numbers as a result of the SHMA and the resultant impact on the environment and already congested road network.	Lower housing numbers from the original draft local plan should be re-instated.			
289/1	H and H M	Mapp		Main	28	Objection is made to the large unrealistic increase in housing numbers as a result of the SHMA and the resultant impact on Kidlington and the surrounding area, which will be devastating to the environment and welfare of existing residents. Many reputable organisations and experts have concluded that the SHMA's estimate of need is grossly over exaggerated.	The much lower estimates of the original local plan should be re-instated.			
290/1	Stephen	Willott	Bicester Green Gym	Main	28	The increased housing provision will have a negative impact on the environment, especially the countryside as greenfield sites around Banbury and Bicester are developed. This will negatively effect and disrupt local ecology, contrary to the NPPF and CDC policy ESD10. The SHMA has been much criticised with claims that need is likely to be overestimated by a factor of 2. There has been no rebuttal of these criticisms and as such the increase in housing is not justified by robust evidence.	The much lower estimates of the original local plan should be re-instated as this will relieve the detrimental effects on the local environment.			
293/1	Wendy	Wright		Main	28		Put fewer houses in the Local Plan			Object to modifications 28 and 34 in the LP and all other modifications which are based on the forecasts of housing need in the SHMA. I understand that in response to the SHMA, the LP now shows that by 2031, the total number of houses in Cherwell would increase by 40% and in Bicester, by 47%, causing major disruption to every community in this district. A report by Professor A Wenban-Smith for CPRE finds that these horrendous SHMA figures are likely to be overestimated by a factor of two. Development will have negative impact on countryside landscape around Bicester and Banbury, as many greenfield areas are designated as strategic sites e.g. Bicester 13 - Gavray Drive, and Bicester 12. The LP is unsound and does not comply with NPPF Core Planning Principle.
303/1	Sarah and Stephen	Moffatt		Main	28	Objection raised to any proposal to allow more housing in rural areas to meet the supposed needs of the City of Oxford. The SHMA has not been subjected to any independent verification of numbers. Until an independent review of the SHMA is carried out it should not be referenced and the Local Plan should continue to use the original figures.	The housing numbers as proposed in the original draft Local Plan should be reinstated.			
307/1	Gillian, Richard, Nicholas	Hopcroft		Main	28	Object to high, unjustified housing numbers. Level of growth proposed is unrealistic. Impact on environment, countryside, public services and road network. The SHMA is unreliable.	Use lower housing figures from the Submission Version			
311/2	Linda	Baker		Main	28	The plan would increase the number of houses in Cherwell by 40% in 17 years with more to be added as 'overspill' from Oxford. This level of growth is unrealistic. Cannot see how the roads network, services and schools in Kidlington will cope with this level of population increase.				

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314/1	Alex	Duncan		Main	28	Object to modifications 28, 34 and all other modifications which are based on forecasts of housing need from the 2014 SHMA. Consider the SHMA estimated need for a 40% increase in housing in Cherwell in 17 years unrealistic.	Use lower housing figures from the Submission Version			
315/3	John and Hilary	Maddicott		Main	28	Object to modifications 28, 34 and all other modifications which are based on forecasts of housing need from the 2014 SHMA. Consider the SHMA estimated need for a 40% increase in housing in Cherwell in 17 years unrealistic.	Use lower housing figures from the Submission Version			
036/1	Rachel	Rahman		Main	28		Lower housing numbers as proposed in the original draft local plan should be reinstated.			Objection to Modifications no. 28 and 34 relating to Policy BSC1, the Oxfordshire SHMA and Housing Allocations and to all other modifications based on the SHMA. The total number of houses in Cherwell would increase by 40%, a figure I consider to be staggering. I also understand that even more houses are likely to be proposed in order to meet the supposed needs of the City of Oxford. Such a level of growth is not credible or realistic which means that the plan will be ineffective. Impact on the environment, countryside and road network. SHMA It is based on aspirational and unrealistic levels of economic growth. A report from an independent planning expert concludes that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two.
061/4	Alan	Lodwick		Main	28	Objects to the use of the SHMA figures to inform the Local Plan.	All Modifications relating to the SHMA should be deleted.			
062/1	A and R	Dixon		Main	28					Object as the addition of 40% housing in 17 years is unsustainable and will put pressure on the local infrastructure.
064/1	Stephen	Holdak		Main	28	Objects to the large increase in the number of houses proposed to be built in Cherwell as a result of the Oxfordshire Strategic Housing Market Assessment (SHMA). The plan would increase the total number of houses in Cherwell by 40% in just 17 years, with even more to be added as 'overspill' from Oxford. This level of growth is unrealistic and unbelievable. The objector is very concerned about the irreversible impact it will have on the environment and the countryside and cannot see how the road network or public services will be able to cope with the levels of population increase envisaged. The SHMA has been seriously criticised by individuals, organisations, experts, local politicians and MPs. A report from an independent planning expert concludes that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two.	The Plan is unsound and the much lower housing numbers in the original draft local plan should be reinstated.			
066/1	Elizabeth	Holdak		Main	28	Objects to the large increase in the number of houses proposed to be built in Cherwell as a result of the Oxfordshire Strategic Housing Market Assessment (SHMA). The plan would increase the total number of houses in Cherwell by 40% in just 17 years, with even more to be added as 'overspill' from Oxford. This level of growth is unrealistic and unbelievable. The objector is very concerned about the irreversible impact it will have on the environment and the countryside and cannot see how the road network or public services will be able to cope with the levels of population increase envisaged. The SHMA has been seriously criticised by individuals, organisations, experts, local politicians and MPs. A report from an independent planning expert concludes that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two.	The Plan is unsound and the much lower housing numbers in the original draft local plan should be reinstated.			

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068/2	Rosemary	Lodwick		Main	28	Objects in the strongest possible terms to modifications 28, 34 and all other modifications which are based on the forecasts of housing need from the 2014 SHMA. The modifications are unsound. The Plan now proposes that 22,700 houses should be built in Cherwell by 2031, many more than proposed in the original draft plan. The total number of houses in Cherwell would increase by 40%, a figure considered to be astonishing. Even more houses are likely to be proposed in order to meet the supposed needs of the City of Oxford. Such a level of growth is not credible or realistic which means that the plan will be ineffective. How will the District be able to cope with this level of growth and it will have an impact on the environment, the countryside as well as on the historic centre of Oxford. How will the road network, which is already over-stretched, and public services be able to meet such a great increase in demand. The SHMA was produced by a firm who, as well as doing planning work, act for leading developers. The document must therefore be considered tendentious, and judged with scepticism. The SHMA has been extensively criticised by individuals, organisations, experts, local politicians and MPs. It is based on aspirational and unrealistic levels of economic growth. A report from an independent planning expert concludes that the SHMA's estimate is likely to be "grossly overstated" by double.	Request that the much lower housing numbers proposed in the original draft local plan are reinstated.			
069/1	Kevin	Allen		Main	28	The Local Plan now proposes that 22,700 houses should be built in Cherwell by 2031, many more than proposed in the original draft plan. The total number of houses in Cherwell would increase by 40%, a figure which is completely unsustainable and unjustifiable. Even more houses are likely to be proposed in order to meet the supposed needs of the City of Oxford. How will the District be able to cope with this level of growth and it will have an impact on the environment, public services and current residents well-being. How will the road network, which is already over-stretched in many places, and public services meet such a great increase in demand. The SHMA housing need figure is more than 2.5 times what the Government's official household projections would suggest, making it highly questionable. The forecast of need is based on a forecast that 85,000 new jobs will be created. However, much of this figure seems to be based on aspirations to develop more commercial property which has not been subject to public consultation or looked at in detail independently. This report prepared by an independent planning expert concludes that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two. The plan is unsound because it is not justified by robust evidence.	Request that the much lower housing numbers proposed in the original draft local plan are reinstated.			
070/1	David	Gilmore		Main	28					The objector is appalled by the proposals particularly to modifications 28 and 34 and how the SHMA figures have been calculated. The SHMA suggests that these are required for the thousands of people coming into the county to work, but there is little indication where all these jobs are coming from. Not even the Government believes that employment in Oxfordshire is going to grow to quite such an extent.
179/16	Matthew	Bates	Oxford City Council	Main	28	There is no explicit acknowledgement of jointly agreed strategic priorities, including agreement to deliver circa 100,000 homes in Oxfordshire in the period 2011-31, delivery of the Oxford and Oxfordshire City Deal, or the Oxfordshire Strategic Economic Plan. This fails to meet the Duty to Cooperate and NPPF requirement to effectively address cross-boundary priorities.	Add additional text to read as follows: <u>Further to this, Cherwell District Council has signed the Oxford and Oxfordshire City Deal, and fully endorses the Oxfordshire Strategic Economic Plan prepared by the Local Enterprise Partnership together with the partner local authorities. Cherwell District Council is a member of the Oxfordshire Growth Board, incorporating the former Spatial Planning and Infrastructure Partnership (SPIP). The Board is challenged with the pressing need to deliver the objectively assessed need for around 100,000 new homes in Oxfordshire (the Housing Market Area) to support a growing population, the need for affordable housing and planned economic growth. The Council fully endorses this objective.</u>			

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179/17	Matthew	Bates	Oxford City Council	Main	28	The Duty to Cooperate (DTC) is a legal requirement and is therefore fundamental to a Local Plan being found sound. The City Council's view is that DTC has not been complied with by Cherwell District Council in preparing their submission Local Plan. Detailed reasons for this view are set out in its Examination statements (June 2014), legal submissions at the Examination, and set out in the letter sent to the Programme Officer on 16th July 2014 .	Insert text to specifically recognise the wider unmet housing need, and further explicitly recognise that the unmet need for Oxford cannot be addressed within its own boundaries.			
179/18	Matthew	Bates	Oxford City Council	Main	28	Makes no reference to the needs of the wider Housing Market Area, i.e. the need for circa 100,000 new homes that are needed to be delivered in Oxfordshire by 2031, as evidenced by the SHMA 2014 which has been agreed by all authorities as evidencing the OAN for Oxfordshire. It further makes no reference to the fact that Cherwell DC has signed the Oxford & Oxfordshire City Deal, together with other local authorities and the Government, committing to jointly meet the full OAN identified in the SHMA. These are significant omissions as the Duty to Cooperate, as described in paragraphs 178-181 of the NPPF, provides the only mechanism for strategic cross-boundary planning. Failing to explicitly recognise the wider Oxfordshire need belies a failure to comply with the test of effectiveness, i.e. be based on effective joint working on cross boundary strategic priorities.				
047/9	Matthew	Coyne	Banbury Town Council	Main	29					Concern that if housing is not developed in Oxford then there will be pressure for more housing delivery in Banbury, which would be unsustainable.
097/4	Sue	Mackrell	Bicester Town Council	Main	29	Question the impact of Oxford City housing need on District housing numbers, in particular on Bicester. Would not wish to see further housing growth as a result of Oxford City's unmet need.				
151/6	Jan	Molyneux	Stephen Bowley Planning Consultancy / Shipton Ltd	Main	29	Meeting the housing needs of Oxford City should not be set aside to be dealt with at some point in the future. There should not be delay in providing essential housing.	The Plan should acknowledge the need of Oxford City and make a significant allocation. An allocation at Shipton on Cherwell would achieve this.			
164/17	Sarah	Smith	Rapleys LLP / Pandora Trading Ltd	Main	29			The overall housing figures proposed in the Modifications are generally supported, in the context that the proposed increase does now meet the objectively assessed needs of the District. The proposed increase in overall housing numbers is to be managed through the distribution strategy as originally proposed, i.e., concentration of development at Banbury and Bicester with limited increase within the remainder of the district. This is also supported.	Not in relation to these particular modifications. Comments are provided in respect of the Sustainability Appraisal under separate representation.	
166/29	Helen	Marshall	CPRE Oxfordshire	Main	29	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			We note the reference to one of the options to a solution to Oxford City's perceived difficulties of meeting its notional housing targets in future, may include a possible strategic review of the Green Belt. It follows that if our arguments as laid out under Modification 28 are endorsed, that we do not accept the need for any such review.
178/2	Suzanne	Bangert	Terrance O'Rurke / Mr & Mrs Ashworth	Main	29				Support the need for a Green Belt review around Kidlington accommodate local housing provision.	

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191/7	Michael	Robson	Cerda Planning Ltd / CALA Homes (Midlands) Ltd	Main	29					The housing figure proposed makes no allowance for the housing needs of Oxford therefore not meeting the full objectively assessed need. Concerned that the evidence from the SHMA in respect of meeting Oxford's housing needs have not been taken forward in the Main Modifications. It is expected that the Council will need to accommodate some of Oxford's unmet housing needs. New sites must be found, as such as land at Bicester, Deddington and Bloxham. The trajectory allows for no flexibility in meeting the housing figure. If any larger sites falls behind that indicated in the trajectory, or any of the identified sites do not come forward the housing figure wil not be fulfilled. New settlements and large urban extensions could face deliverability challenges. Large strategic housing schemes will experience long lead-in times so they are not a short term or quick solution to housing land supply. This is usually as a result of new or major upgrades to surrounding infrastructure. Future rates of delivery will need to be realistic by considering the type of scheme, number of developers and how quickly developers can sell the homes built.
204/3	Nik	Lyzba	JPPC / The City of Oxford Charity	Main	29	It is inevitable that there will be unmet housing needs which Oxford will not be able to accommodate. Given the extent of housing need and the housing crisis in Oxford, such a review should not be put off but should be undertaken as part of this Local Plan process. The Local Plan provides the mechanism for such a review and the Plan should not include land within the Green Belt which it is not intended to keep permanently open. The modification confirms the Council's co-operation with other Oxfordshire authorities in order to ensure that Oxfordshire's housing needs are met. However it seeks to delay any work which may be required "to be completed within two years". No date has been referenced.	Clarification and confirmation needed regarding a potential strategic review of the Green Belt. Timescale is needed. Previous representations made to the Local Plan (Representation 384 and 38).			
205/2	Nik	Lyzba	JPPC / Oxford University Press	Main	29	Modification indicates that such partial review of the Local Plan should be completed within a 2 year period. There is no similar timescale included for the review of the Green Belt to accommodate necessary employment needs. E.g. Langford Lane.	Timescale for the review of the Green Belt is needed. Previous representations made to the Local Plan (Representation 190 and 36).			
208/4	Alice	Kirkham	Persimmon Homes and Charles Church Midlands	Main	29	Insufficient co-operation with Oxford City Council and other Oxfordshire authorities in meeting the county's housing needs. Fail to take account of the unmet housing needs of Oxford City. This should be considered now as any delay would lead to a larger backlog of housing need and will be even more difficult to meet.	The Plan should include a higher housing requirement following proper consultation of the appropriate share of Oxford City's housing needs that the district should meet.		The Sustainability Appraisal fails to assess the alternative of planning for a higher quantum of housing to meet some of the wider housing market area's needs (i.e. some of the unmet need from Oxford City).	
229/12	Nik	Lyzba	JPPC / The Tripartite (Oxford University, Merton College and R.Smith)	Main	29					The Council cannot be satisfied that the green belt boundaries proposed would be able to endure. As a consequence it would be inappropriate for the green belt boundaries to be fixed at this stage, apart from limited reviews. The adoption of such boundaries which may have a limited lifespan would not be consistent with the NPPF. The proposed modification seeks to prevaricate on the need for a review to seek to accommodate some of the unmet need arising from Oxford and to delay "a partial review" for a period of 2 years. The timescale shown should be changed to 12 to 18 months. Additionally, the paragraph must include provisions which make clear that if such a review is not completed within this timescale, the plan should be regarded as out-of date unless Oxford's unmet housing needs have been met elsewhere.
251/3	Heather	Vickers	Planning Potential / Gleeson Developments Ltd	Main	29	CDC should pre-empt the requirement to absorb a portion of Oxford City Council's unmet need, in order to avoid a partial review of the Plan.	Include text within B.89b to confirm that a partial review will only be required if CDC cannot already cater for this unmet need.			

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252/1	Ian	Gillespie	Carter Jonas / of the Oxford Diocesan Board of Finance	Main	29	The Plan does not make early provision to assist with accommodating the wider housing needs identified in the Oxon SHMA. Further work is needed to understand the capacity of Oxford but there is a general acceptance that not all of Oxford's needs (28,000) can be met within its administrative area.	Early provision to meet Oxford's needs.			Support the proposed increase in the housing target
258/5	Craig	Barnes	Gladman Developments	Main	29		The Plan should include a policy commitment to the review of the Local Plan housing requirement and spatial strategy should additional needs arise in the future. The Policy should be written in a way that it is activated when neighbouring authorities make a former request for an explicit level of housing to be met by Cherwell through Duty to Cooperate.		No comment	This is not considered to be sufficient to guarantee that any unmet housing needs arising from the District's neighbours within the Housing Market Area will be met by Cherwell District Council once the level of need is established. Understand that the Inspector cannot force the Council into undertaking a Green Belt review and disagree with Oxford City Council that any needs arising from the city must be accommodated in this area.
264/2	Andrew	Hornsby-Smith		Main	29			Welcomes the emphasis on the importance of the Green Belt in checking the sprawl of Oxford and indicates a strategic review would be premature in the absence of a completed land availability assessment in Oxford City. The process by which a strategic review of the Green Belt in the Oxford area may occur at a future date is logical.		
272/1	Kevin	Ayrton	Carter Jonas / Pain family	Main	29	The modifications are supported in so far as they seek to address the district's objectively assessed needs, but the representor is concerned that no early consideration is being given to the likely need for additional housing in the district to meet Oxford's housing needs.				
299/1	Oliver	Taylor	Strutt & Parker	Main	29					Work is being undertaken by Oxford City Council with regards to their abilities to meet the findings of the SHMA. Oxford City has commissioned an independent review of potential sites to consider its housing capacity. Oxford has published 'Investing in Oxford's future: Deciding on strategic growth options, A Route Map' which makes clear that the City Council seeks a review of the Oxford Green Belt immediately beyond its boundaries, to allow homes to be built sustainably. Pleased that Cherwell has no intention to review the Green Belt boundaries around Oxford City. Welcome the modification that a means to remedy any housing shortfall coming out of Oxford City may potentially be met through the provision of a new settlement.
305/2	Andrew	Bower	Court Consulting / Mr & Mrs P&S Beecroft; N Godwin Esq; AJ Wilcox Esq; EG Wilcox Esq; M Howard Esq	Main	29			Support the significant strategic modifications made in Proposed Modification 29. It is appreciated that the current Cherwell Local Plan is seeking to meet the needs of Cherwell District as an important first step in properly providing for Oxfordshire's housing requirement.		With regard to Oxfordshire's housing requirement it is essential that this new baseline position is established as soon as possible. There is clear recognition that one spatial option to consider for meeting the County's housing need is a new settlement. The process of finding additional land in and around existing settlements has been lengthy and complex. The level of growth Oxfordshire will inevitably have to accommodate in future indicates that a new settlement could form part of a new development plan document prepared by the Oxfordshire authorities. There is a lead in time for a new settlement to produce new housing on the ground. A new settlement at land North West of the M40 Junction 10 has potential to meet housing requirements in the medium to long term. The sensitivity of Green Belt land release is
061/5	Alan	Lodwick		Main	29	Objects to the use of the SHMA figures to inform the Local Plan.	All Modifications relating to the SHMA should be deleted.			
179/19	Matthew	Bates	Oxford City Council	Main	29	The Duty to Cooperate (DTC) is a legal requirement and is therefore fundamental to a Local Plan being found sound. The City Council's view is that DTC has not been complied with by Cherwell District Council in preparing their submission Local Plan. Detailed reasons for this view are set out in its Examination statements (June 2014), legal submissions at the Examination, and set out in the letter sent to the Programme Officer on 16th July 2014 .				

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179/20	Matthew	Bates	Oxford City Council	Main	29	The NPPF (paragraph 47) is clear that Local Plans should meet the full, objectively assessed housing need in the housing market area, as far as consistent with the policies in the Framework. There is no support in the NPPF for adopting a 'stepped' approach, and this is not consistent with the requirement that plans should be positively prepared.				
179/21	Matthew	Bates	Oxford City Council	Main	29	In the City Council's view, and reflecting the above, there is a significant risk that the Cherwell Local Plan, if adopted, would be vulnerable to challenge by developers as it does not provide a 5-year supply that responds to the actual housing need which crosses tightly-drawn administrative boundaries (i.e. the HMA's need as referred to in the NPPF).				
179/22	Matthew	Bates	Oxford City Council	Main	29	The City Council objects strongly to the process alluded to in paragraph 4 of B89b, and the overall timing envisaged in paragraphs 5 and 6. The Oxfordshire Growth Board previously SPIP) has received two separate 'Critical Friend' commentaries which concur that the process of assessing spatial options for meeting cross-boundary housing need to inform the statutory plan-making process should take no more than 9-18 months. The City Council is concerned that timely progress is not being made to fully and meaningfully address the needs of the HMA as envisaged in the NPPF. It is inappropriate for paragraph 6 of B89b to refer to a partial review being triggered at an undefined point and being completed at an undefined point in time.	Given the urgency of the need for more housing for Oxford, the City Council urges a timescale for adoption of a reviewed Local Plan of no more than 2 years from adoption of the current version (should this come to pass). Should the Plan progress, it will be necessary to replace the whole of MM29 with a new Policy PSD2 within the earlier section 'A Strategy for Development in Cherwell', which provides a clear and appropriate mechanism for undertaking an early Plan review.			
179/23	Matthew	Bates	Oxford City Council	Main	29	The text is construed to distance Cherwell DC from meeting its obligations in respect of the Duty to Cooperate and addressing cross-boundary needs, and provides no more assurance of any intention to address the wider unmet need than the wording it replaces. Replacement text is required to provide the full context of the SHMA 2014 and Growth Board (SPIP) process, give due recognition of Oxford's unmet need and potential underdelivery in Cherwell, and recognise that as part of the early Plan review, a review the boundary of the Oxford Green Belt is likely to be necessary.	Replace Cherwell DC Proposed Modification with the following paragraphs (part 1): <u>B.89b The SHMA also identifies an objectively assessed need for 24,000-32,000 new homes arising from neighbouring Oxford of which only up to circa 10,300 can be met within the City's administrative boundary. In accordance with the statutory Duty to Cooperate, the Council will, together with the other Oxfordshire local authorities, play its part in accommodating the unmet housing need arising from Oxford that cannot be accommodated within the City's own boundaries. Policies PSD2 and BSC1 provide for this.</u>			
179/24	Matthew	Bates	Oxford City Council	Main	29	The text is construed to distance Cherwell DC from meeting its obligations in respect of the Duty to Cooperate and addressing cross-boundary needs, and provides no more assurance of any intention to address the wider unmet need than the wording it replaces. Replacement text is required to provide the full context of the SHMA 2014 and Growth Board (SPIP) process, give due recognition of Oxford's unmet need and potential underdelivery in Cherwell, and recognise that as part of the early Plan review, a review the boundary of the Oxford Green Belt is likely to be necessary.	Replace Cherwell DC Proposed Modification with the following paragraphs (part 2): <u>B.89c The NPPF requires that local authorities must work across boundaries to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies of the NPPF, including to meet development requirements from neighbouring areas that have a lack of physical capacity to meet their own needs. Oxford is identified as a national economic asset, and at the heart of Oxfordshire's growing knowledge economy. It is the primary destination in Oxfordshire for jobs, accommodating around one third of all jobs in the county, and has the highest levels of sustainable travel in the county. It is also the least affordable city in the UK, and in urgent need of significant affordable and market housing to secure its social, environmental and economic sustainability, and to meet the needs of future generations.</u>			

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179/25	Matthew	Bates	Oxford City Council	Main	29	<p>The text is construed to distance Cherwell DC from meeting its obligations in respect of the Duty to Cooperate and addressing cross-boundary needs, and provides no more assurance of any intention to address the wider unmet need than the wording it replaces.</p> <p>Replacement text is required to provide the full context of the SHMA 2014 and Growth Board (SPIP) process, give due recognition of Oxford's unmet need and potential underdelivery in Cherwell, and recognise that as part of the early Plan review, a review the boundary of the Oxford Green Belt is likely to be necessary.</p>	<p>Replace Cherwell DC Proposed Modification with the following paragraphs (part 3):</p> <p><u>B89d The housing target of 1,140 dwellings per annum for Cherwell will be reviewed in the short term, to ensure that a proportion of Oxford's unmet need is addressed. Given the need to accommodate development needs in a sustainable way, work will be undertaken jointly with Oxford and the other Oxfordshire authorities to undertake a full assessment of the Oxford Green Belt. This will happen concurrently to an assessment of the sustainability of other spatial options for meeting a proportion of Oxford's unmet need. An associated sustainability appraisal will be prepared. Should it be concluded that some or all of Oxford's unmet housing need is best met by means of Green Belt boundary review and one or more urban extensions, a formal review of the Green Belt boundary north of Oxford will be included in an early partial review of the Cherwell Local Plan 2011-2031.</u></p>			
179/26	Matthew	Bates	Oxford City Council	Main	29	<p>The text is construed to distance Cherwell DC from meeting its obligations in respect of the Duty to Cooperate and addressing cross-boundary needs, and provides no more assurance of any intention to address the wider unmet need than the wording it replaces.</p> <p>Replacement text is required to provide the full context of the SHMA 2014 and Growth Board (SPIP) process, give due recognition of Oxford's unmet need and potential underdelivery in Cherwell, and recognise that as part of the early Plan review, a review the boundary of the Oxford Green Belt is likely to be necessary.</p>	<p>Replace Cherwell DC Proposed Modification with the following paragraphs (part 4): (b.89 d continued)</p> <p><u>There is also recognition that the housing delivery target in Policy BSC1 will require a very substantial increase in the rate of housing delivery compared to historical rates of delivery. This will be a challenge within the current spatial strategy of focusing growth primarily on Bicester, Banbury and the former RAF Upper Heyford site. The early Plan review will also consider whether the delivery of housing to meet Cherwell's own district-wide objectively assessed needs could be better delivered by means of an alternative spatial strategy, including consideration of the role of the Green Belt to the north of Oxford.</u></p>			
179/27	Matthew	Bates	Oxford City Council	Main	29	<p>The text is construed to distance Cherwell DC from meeting its obligations in respect of the Duty to Cooperate and addressing cross-boundary needs, and provides no more assurance of any intention to address the wider unmet need than the wording it replaces.</p> <p>Replacement text is required to provide the full context of the SHMA 2014 and Growth Board (SPIP) process, give due recognition of Oxford's unmet need and potential underdelivery in Cherwell, and recognise that as part of the early Plan review, a review the boundary of the Oxford Green Belt is likely to be necessary.</p>	<p>Replace Cherwell DC Proposed Modification with the following paragraphs (part 5):</p> <p><u>B89e The SHMA 2014 identified that a key contributor to the significant unmet housing need was the past under-delivery of housing in Oxfordshire which contributes to the current need. The Oxford and Oxfordshire City Deal also commits to the acceleration of strategic housing delivery. It is therefore critical that an early partial review of the Cherwell Local Plan 2011-2031 takes place. If a revised Local Plan (incorporating review of housing target and strategic sites) is not submitted and adopted in a timely manner as required by Policy PSD2, in accordance with NPPF paragraph 14 all subsequent planning applications will be considered against the NPPF and Presumption in favour of Sustainable Development, instead of the Cherwell Plan.</u></p> <p>B.90 The Council has further had regard to the NPPF by ensuring in particular that:...</p>			

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301/8	Bev	Hindle	Oxfordshire County Council	Main	29					There is a need to ensure that the revised wording in the plan adequately addresses the issue of the Duty to Co-operate, particularly with regard to collaborative working to deal with the potential unmet housing needs of Oxford. A countywide strategic review of spatial strategy options and associated infrastructure planning is required to accommodate unmet need, the process for which has to be defined. It is suggested that the wording proposed in the modifications should be amended to make it more explicit about the need for an Oxfordshire-wide, comprehensive approach, which integrates housing provision, employment and infrastructure across the county. Modification no. 29 states willingness to work jointly with all the Oxfordshire authorities under the Duty to Co-operate to address housing needs in the Oxfordshire housing market area. It states that if the outcome of this work is that Cherwell and other districts need to meet additional needs of Oxford, it will trigger a partial review of the Local Plan for that part of the unmet need to be accommodated within Cherwell and that this review would be completed within two years.
301/8	Bev	Hindle	Oxfordshire County Council	Main	29					Cont.....In view of the wording in the Localism Act and the Oxfordshire Statement of Cooperation, the Council considers that the wording of this modification should reflect the continued active joint working amongst all authorities in Oxfordshire. It is suggested that the text should also clarify that the process for dealing with unmet need will be strategic and will manage unmet housing need through development of a comprehensive approach which integrates housing provision, employment and infrastructure across the county. Related to this the County Council would like to see the option of a 'comprehensive review' stated, beyond the current suggested 'partial review'. Suggested amended wording is set out in the Table of Detailed Comments.
301/56	Bev	Hindle	Oxfordshire County Council	Main	29	Policy BSC 1 – District wide Housing Distribution (Duty to Cooperate) In view of the wording in the Localism Act and the Oxfordshire Statement of Cooperation, the Council considers that the wording of this modification should reflect the continued active joint working amongst all authorities in Oxfordshire. It is suggested that the text should also clarify that the process for dealing with unmet need will be strategic and will manage unmet housing need through development of a comprehensive approach which integrates housing provision, employment and infrastructure across the county. Related to this the County Council would like to see the option of a 'comprehensive review' stated, beyond the current suggested 'partial review'. Suggested amended wording is set out in the Table of Detailed Comments.	Amend wording of 89.b to read: At the start of new first para add:- "Cherwell District Council will continue to work <u>actively</u> under..." At the start of para 4 add:- Cherwell District Council will continue to work jointly with the Oxfordshire local <u>authorities in the production of a comprehensive approach which integrates housing provision, employment and infrastructure across the County. This work will</u> to assess all reasonable spatial options, including... At the start of new para 6 amend as follows:- If this joint work reveals that Cherwell and other Districts need to meet additional need for Oxford, this will trigger a partial <u>comprehensive</u> review of the Local Plan <u>in part or in whole</u> , to be completed within two years and taking the form of the preparation of a separate Development Plan document for that part of the unmet need to be accommodated in the Cherwell District.			
002/2	Gary	Bell		Main	30	The proposed deletion of the 2nd and 4th bullet points should be retained.	The proposed deletion of the 2nd and 4th bullet points should be retained.		No comment	
047/10	Matthew	Coyne	Banbury Town Council	Main	30					Retail, leisure should lead development on the Bolton Road site to improve town centre connectivity and vitality. The development of the site would also provide an opportunity for the redevelopment of outbuildings to the rear of Parsons Street. Consider it to be suitable location for a supermarket with car parking.

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161/2	Martin	Small	English Heritage	Main	30		The sixth indent of the proposed replacement text should be reworded as follows: "promoting strategic, mixed use developments, conserving heritage assets such as those of national importance at Former RAF Upper Heyford and actively encouraging wildlife potential.....".			The sixth indent in the proposed replacement text refers to "seeking to conserve heritage assets such as those of national importance at Former RAF Upper Heyford". English Heritage welcomes the reference to the significance of the heritage assets at the Former RAF Upper Heyford, but the proposed text does not accurately reflect the tenth core planning principle of the National Planning Policy Framework, which is "conserve heritage assets in a manner appropriate to their significance.....". "Seeking to conserve" is therefore too weak and inconsistent with the Framework.
164/18	Sarah	Smith	Rapleys LLP / Pandora Trading Ltd	Main	30			The overall housing figures proposed in the Modifications are generally supported, in the context that the proposed increase does now meet the objectively assessed needs of the District. The proposed increase in overall housing numbers is to be managed through the distribution strategy as originally proposed, i.e., concentration of development at Banbury and Bicester with limited increase within the remainder of the district. This is also supported.	Not in relation to these particular modifications. Comments are provided in respect of the Sustainability Appraisal under separate representation.	
166/30	Helen	Marshall	CPRE Oxfordshire	Main	30	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	Any development allocated to Gavray Drive is restricted to the land west of Langford Brook. Modification for Bicester 12 should be discarded by reverting to the Submission Local Plan for the site and focussing on low-in-scale well-designed buildings (both residential and industrial).			Gavray Drive - There is a severe conflict of interest in trying to bring Gavray Drive in as a new Strategic Housing Site when the majority of it lies within the Conservation Target Area of the Ray valley, containing as it does a rich local wildlife habitat. Whereas we agree to the proposed development west of Langford Brook, where the majority of the targeted 300 dwellings could be accommodated, we cannot agree that the "Key Site Specific Design and Place Shaping Principles" listed will provide adequate safeguards to comply with the requirements of policy ESD111 to prevent adverse impact on the CTA, let alone securing a net biodiversity gain as envisaged under NPPF policy 109. What does unnecessarily cramming a few extra houses down the eastern edge of the site, so blocking off the Gavray Local Wildlife Site from the rest of the CTA, achieve? As it is this historic site has been already 'shaved' by the construction of the new railway "chord".
166/30	Helen	Marshall	CPRE Oxfordshire	Main	30	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	Any development allocated to Gavray Drive is restricted to the land west of Langford Brook. Modification for Bicester 12 should be discarded by reverting to the Submission Local Plan for the site and focussing on low-in-scale well-designed buildings (both residential and industrial).			Cont.....Bicester 12 - The suggested mitigation appears unsound as it attempts to square the circle of "promoting strategic mixed use development while seeking to conserve heritage assets and actively encouraging wildlife potential". It is hard to envisage the Ancient Medieval Village being a feature of the site as it is surrounded by a housing estate and industrial complex with heavy goods vehicles pounding through day and night! Since it is accepted the CTA section should not be developed, why include it in the site at all? The safeguarded land "for future highway capacity improvements to peripheral routes" is presumably for a new ring road running from the A41 just north of Junction 9 of the M40, swinging round the back of the Graven Hill Development across the A41 Aylesbury Road through this new industrial and residential estate at B12, and finishing at the roundabout at Gavray drive. This supposed main road is not identified anywhere in the proposed Local Plan.
204/2	Nik	Lyzba	JPPC / The City of Oxford Charity	Main	30	The modification contains reference to the strategy which includes "protecting the Oxford Green Belt" without qualification.	Given the acceptance of the need for Green Belt reviews to accommodate local housing needs, the words should be qualified to note that an exception to this will be to meet local housing needs.			
207/3	Jacqueline	Mulliner	Terence O'Rourke Ltd / Blenheim Palace Estate	Main	30	Needs to reiterate Modification number 17. Without reference to Green Belt review, there is conflict between concentrating development in sustainable rural locations and protecting the Oxford Green Belt.	Acknowledge the need for Green Belt review around Kidlington in order to concentrate development in sustainable locations.			

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229/13	Nik	Lyzba	JPPC / The Tripartite (Oxford University, Merton College and R.Smith)	Main	30					The paragraph indicates that the Council is committed to meeting the needs arising from the SHMA both for Cherwell and in respect of other unmet needs. However, it seeks to "protect the Oxford Green Belt". The words used should contain the caveat "unless a partial review of the plan indicates that strategic changes to the green belt are required or where limited reviews are required to accommodate the proposals included in the Plan".
251/4	Heather	Vickers	Planning Potential / Gleeson Developments Ltd	Main	30	In order for para B.90 to be brought in line with the NPPF, additional wording is suggested to reflect the importance of the heritage asset being considered.	Amend B.90 (6th bullet point) to read as follows: promoting strategic, mixed use developments while seeking to conserve heritage assets <u>in a manner appropriate to their significance.</u>			
259/14	Paul	Burrell	Pegasus Group / The Dorchester Group	Main	30			The modification commits the Council to meeting in full its objectively assessed housing needs. The delivery of future growth in accordance with the NPPF's Core Planning Principles is also supported as an appropriate basis on which to deliver the housing and employment needs for the District.		
179/28	Matthew	Bates	Oxford City Council	Main	30	It is noted that the text for paragraph B.90 proposes "protecting the Oxford Green Belt." As set out above, this statement is inconsistent with proposals elsewhere to review the Green Belt boundary.	Amend wording to read " <u>...protecting purpose, function, and overall integrity of the Oxford Green Belt.</u> "			
179/29	Matthew	Bates	Oxford City Council	Main	30	Object that the Plan now provides a policy mechanism for reviewing the Green Belt around Kidlington to meet "local" housing need, relating to the increase in the rural housing allocation, whilst not recognising that this is also part of, and inseparable from, the wider needs of the HMA.	If the Plan were to progress, the City Council insists that references to 'local' Green Belt reviews are deleted and instead text introduced into Policy ESD14 and supporting text to set out a timetable for a strategic joint review of the Green Belt, should this be necessary (as expected) to meet both Cherwell's housing needs and those of the wider HMA (detailed suggestions provided).			
179/30	Matthew	Bates	Oxford City Council	Main	30	The Duty to Cooperate (DTC) is a legal requirement and is therefore fundamental to a Local Plan being found sound. The City Council's view is that DTC has not been complied with by Cherwell District Council in preparing their submission Local Plan. Detailed reasons for this view are set out in its Examination statements (June 2014), legal submissions at the Examination, and set out in the letter sent to the Programme Officer on 16th July 2014 .				
179/31	Matthew	Bates	Oxford City Council	Main	30	Changes necessary to reflect crossborder working through the Growth Board, and ensure a consistent and pragmatic approach to reviewing the Green Belt	Amend text to read as follows: The Council is committed to meeting the district's objectively assessed needs and, as described above, to working with partner authorities to determine how any other unmet needs arising from the SHMA can be sustainably accommodated <u>meet the wider cross-boundary needs</u> within the Oxfordshire Housing Market Area. The housing strategy of this Local Plan seeks to deliver growth in accordance with the NPPF's Core Planning Principles including: - providing a positive vision for the future of Cherwell: a strategic growth and investment approach to the towns; an enlarged settlement in the centre of the District, further development at the villages to sustain them - proactively driving and supporting sustainable economic development by meeting the SHMA's Committed Economic Growth scenario.			
179/31	Matthew	Bates	Oxford City Council	Main	30	Changes necessary to reflect crossborder working through the Growth Board, and ensure a consistent and pragmatic approach to reviewing the Green Belt	Cont..... - seeking to secure high quality design and a good standard of amenity by developing new neighbourhoods and achieving regeneration and redevelopment of key sites - taking account of the different roles and character of Cherwell's places by promoting the vitality of Bicester, Banbury and Kidlington and their ability to serve their hinterlands, protecting the <u>purpose, function and overall integrity of the Oxford Green Belt</u> and concentrating development in sustainable rural locations to protect the intrinsic character and beauty of the countryside and to support thriving rural communities...			

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137/19	Theresa	Goss	Adderbury Parish Council	Main Appendix B	31	Allotments: Where Neighbourhood Plans are being pursued it should be addressed within the Plan.				
164/19	Sarah	Smith	Rapleys LLP / Pandora Trading Ltd	Main	31			The overall housing figures proposed in the Modifications are generally supported, in the context that the proposed increase does now meet the objectively assessed needs of the District. The proposed increase in overall housing numbers is to be managed through the distribution strategy as originally proposed, i.e., concentration of development at Banbury and Bicester with limited increase within the remainder of the district. This is also supported.	Not in relation to these particular modifications. Comments are provided in respect of the Sustainability Appraisal under separate representation.	
047/11	Matthew	Coyne	Banbury Town Council	Main	32					Some of the strategic housing sites fall outside of the boundary for Banbury, and fall in neighbouring Parish Council areas. This will cause confusion too future residents. Request for review of parish and ward boundaries.
101/1	Sarah	Turner		Main	32	The proposed deletion of the last sentence should not be removed from Policy BSC1, as the green buffers are an important part of maintaining the character of settlements.	The proposed deletion of the last sentence should be reinstated.			
151/7	Jan	Molyneux	Stephen Bowley Planning Consultancy / Shipton Ltd	Main	32	Significant delay in the provision of developmnet capacity in the area	Provision of a strategic development site at Shipton on Cherwell to provide development within Kidlington and North Oxford			
164/20	Sarah	Smith	Rapleys LLP / Pandora Trading Ltd	Main	32			The overall housing figures proposed in the Modifications are generally supported, in the context that the proposed increase does now meet the objectively assessed needs of the District. The proposed increase in overall housing numbers is to be managed through the distribution strategy as originally proposed, i.e., concentration of development at Banbury and Bicester with limited increase within the remainder of the district. This is also supported.	Not in relation to these particular modifications. Comments are provided in respect of the Sustainability Appraisal under separate representation.	
251/5	Heather	Vickers	Planning Potential / Gleeson Developments Ltd	Main	32	Additional strategic development sites are required within Banbury to meet the objectively assessed housing need.	Increase the number of strategic development sites within Banbury from 10 to 11.			
164/21	Sarah	Smith	Rapleys LLP / Pandora Trading Ltd	Main	33			The overall housing figures proposed in the Modifications are generally supported, in the context that the proposed increase does now meet the objectively assessed needs of the District. The proposed increase in overall housing numbers is to be managed through the distribution strategy as originally proposed, i.e., concentration of development at Banbury and Bicester with limited increase within the remainder of the district. This is also supported.	Not in relation to these particular modifications. Comments are provided in respect of the Sustainability Appraisal under separate representation.	

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017/2	Anthony and Pauline	Wagg		Main	34		The much lower housing numbers as proposed in the previous Plan should be reinstated.		No comment	Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40%, a figure that is not supported by any evidence. There could be even more homes to be built in order to meet the needs of Oxford City Council. The District will not be able to cope with this level of growth and there will be negative impact on the countryside. The existing road network is over-stretched and public services will struggle to meet such a great increase in demand. The SHMA has been extensively criticized by individuals, organisations, experts, local politicians and MPs. A critical report was commissioned by CPRE which concluded that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two. No response received to these criticisms or any attempt to independently review the SHMA.
018/2	Jeremy	Hayward		Main	34		The much lower housing numbers as proposed in the previous Plan should be reinstated.		No comment	Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40%. The District will not be able to cope with this level of growth and there will be negative impact on the environment. The existing road network is over-stretched and in generally poor condition. Current public transport in rural villages is inadequate and there seems to be no plan to expand and improve public services, especially schools. The SHMA has been extensively criticized by individuals, organisations, experts, local politicians and MPs. A critical report was commissioned by CPRE which concluded that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two. No response received to these criticisms or any attempt to independently review the SHMA.
020/2	Michael and Sylvia	Davy		Main	34		The much lower housing numbers as proposed in the previous Plan should be reinstated.		No comment	Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40% which is totally inappropriate and unjustifiable. There could be even more homes to be built in order to meet the needs of Oxford City Council. Rural communities should not have developments imposed on them by Oxford City Council. The District will not be able to cope with this level of growth and there will be negative impact on the environment, traffic congestion and the strain on local services and amenities and the countryside. Existing road network is over-stretched in many places and public services will struggle to meet such a great increase in demand. Recent developments in Bloxham have received no consideration of their negative impact on the village and are widely opposed by the majority of the villagers. The SHMA has been extensively criticized by individuals, organisations, experts, local politicians and MPs. A critical report was commissioned by CPRE which concluded that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two. No response received to these criticisms or any attempt to independently review the SHMA.

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021/2	Henri	Papenfus		Main	34		The much lower housing numbers as proposed in the previous Plan should be reinstated.		No comment	Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40%, a figure to be totally unrealistic. There could be even more homes to be built in order to meet the needs of Oxford City Council. The District will not be able to cope with this level of growth and there will be negative impact on the environment, quality of life and the countryside. The existing road network is over-stretched in many places, and public services will not meet such a great increase in demand. The SHMA has been extensively criticized by individuals, organisations, experts, local politicians and MPs. A critical report was commissioned by CPRE which concluded that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two. No response received to these criticisms or any attempt to independently review the SHMA.
022/2	Gary and Louise	Crone		Main	34		The much lower housing numbers as proposed in the previous Plan should be reinstated.		No comment	Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40%, a figure to be astounding. There could be even more homes to be built in order to meet the needs of Oxford City Council. The District will not be able to cope with this level of growth and there will be negative impact on the environment, quality of life and the countryside. The existing road network is over-stretched in many places, and public services will not meet such a great increase in demand. The SHMA has been extensively criticized by individuals, organisations, experts, local politicians and MPs. A critical report was commissioned by CPRE which concluded that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two. No response received to these criticisms or any attempt to independently review the SHMA.
023/2	Paul	Webb		Main	34		The much lower housing numbers as proposed in the previous Plan should be reinstated.		No comment	Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40%, a figure to be staggering. There could be even more homes to be built in order to meet the needs of Oxford City Council. The District will not be able to cope with this level of growth and there will be negative impact on the environment and the countryside. The existing road network is over-stretched and public services will not be able to meet such a great increase in demand. The SHMA has been extensively criticized by individuals, organisations, experts, local politicians and MPs. A critical report was commissioned by CPRE which concluded that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two. No response received to these criticisms or any attempt to independently review the SHMA.

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024/2	Catherine	Grebenik		Main	34		The much lower housing numbers as proposed in the previous Plan should be reinstated.		No comment	Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40%. There could be even more homes to be built in order to meet the needs of Oxford City Council. The District will not be able to cope with this level of growth and there will be negative impact on the environment and the countryside. The existing road network is over-stretched and public services will not be able to meet such a great increase in demand. Other services like sewerage will also be unable to cope with the increase in use. The SHMA has been extensively criticized by individuals, organisations, experts, local politicians and MPs. The SHMA is based on aspirational and unrealistic levels of economic growth. A report from an independent planning expert concludes that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two. No response received to these criticisms or any attempt to independently review the SHMA.
025/2	Steven	Daggitt		Main	34		The much lower housing numbers as proposed in the previous Plan should be reinstated.		No comment	Objection raised on the forecasts of housing need from the 2014 SHMA. The adoption of the increased housing numbers recommended in the SHMA makes the plan unsound because the SHMA is based on unrealistically large levels of economic growth. A report from an independent planning expert concludes that the SHMA's estimate is likely to be 'grossly overstated' by a factor of over two. No response received to these criticisms or any attempt to independently review the SHMA. The huge increase in housing numbers proposed will completely swamp existing infrastructure in Cherwell District making the plan ineffective.
030/2	Jonathan	Cole		Main	34		The much lower housing numbers as proposed in the previous Plan should be reinstated.			Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40%, a figure to be staggering. There could be even more homes to be built in order to meet the needs of Oxford City Council. The District will not be able to cope with this level of growth and there will be negative impact on the environment and the countryside. The existing road network is over-stretched, and public services will not meet such a great increase in demand. The SHMA has been extensively criticized by individuals, organisations, experts, local politicians and MPs. A critical report was commissioned by CPRE which concluded that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two. No response received to these criticisms or any attempt to independently review the SHMA.
032/2	Andrew	McCallum		Main	34		The much lower housing numbers as proposed in the previous Plan should be reinstated.			Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40%, a figure that is not supported by any evidence. There could be even more homes to be built in order to meet the needs of Oxford City Council. The District will not be able to cope with this level of growth and there will be negative impact on the countryside. The existing road network is over-stretched and public services will struggle to meet such a great increase in demand. The SHMA has been extensively criticized by individuals, organisations, experts, local politicians and MPs. A critical report was commissioned by CPRE which concluded that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two. No response received to these criticisms or any attempt to independently review the SHMA.

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035/2	Luthfer	Rahman		Main	34		Lower housing numbers as proposed in the original draft local plan should be reinstated.			Objection to Modifications no. 28 and 34 relating to Policy BSC1, the Oxfordshire SHMA and Housing Allocations and to all other modifications based on the SHMA. The total number of houses in Cherwell would increase by 40%, a figure I consider to be staggering. I also understand that even more houses are likely to be proposed in order to meet the supposed needs of the City of Oxford. Such a level of growth is not credible or realistic which means that the plan will be ineffective. Impact on the environment, countryside and road network. SHMA It is based on aspirational and unrealistic levels of economic growth. A report from an independent planning expert concludes that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two.
047/12	Matthew	Coyne	Banbury Town Council	Main	34					Support for housing delivery table
053/2	Mr and Mrs	Towler		main	34		The much lower housing numbers in the original draft local plan are reinstated.			We understand that the Plan now proposes that 22,700 houses should be built in Cherwell by 2031, many more than proposed in the original draft plan. The total number of houses in Cherwell would increase by 40%, a figure we consider to be shocking. We also understand that even more houses are likely to be proposed in order to meet the supposed needs of the City of Oxford. We do not believe that the District will be able to cope with this level of growth and we are very concerned about the impact it will have on the environment and the countryside and road network
087/2	Dennis	Price		Main	34					Undue weight being given to SHMA together with inadequate public consultation.
090/2	Fred	Taylor		Main	34	District cannot cope with level of growth proposed. Impact on environment, public services and road network. SHMA figures are unreliable.	Use lower housing figures from the Submission Version.			
091/2	Peter	Jay		Main	34	Object to high, unjustified housing numbers. Concern about impact on countryside, the environment and community. The SHMA is flawed.	Use lower housing figures from the Submission Version .			
102/2	Richard	Broadbent		Main	34					Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40%, a figure that is staggering. There could be even more homes to be built in order to meet the needs of Oxford City Council. It is not possible to find the significant funds for the infrastructure. In the economic circumstances of today, there is no chance of getting the capital to provide the facilities and services needed. Existing infrastructure and services would be overwhelmed. Existing roads cannot be kept in good repair. Schools are nearly full. The NHS is struggling to cope with the existing numbers. Journey times are already badly affected by the density of traffic. Understand the pressures on the council to accept the SHMA figures, to avoid starting the Local Plan process again. However, the only effect of accepting the housing figures in the SHMA will be that developers will continue to be able to pick any site to develop, without worrying about the Local Plan, because the five year supply will not be met, and there will therefore be a presumption in favour of any development.

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103/2	Jeffrey	Wright	Begbroke Parish Council	Main	34		The much lower housing numbers proposed in the original draft local plan should be reinstated.			Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40%, a figure to be over ambitious. There could be even more homes to be built in order to meet the needs of Oxford City Council. The District or its residents will not be able to cope with this level of growth and are very concerned about the impact it will have on the environment. Particularly concerned that Green Belt reviews in Kidlington (Mod No.62) could impact on the Green Belt in Begbroke if Kidlington's local housing needs cannot be accommodated within the built up area. Also concerned about Mod No.304 regarding the indicative boundaries of London-Oxford Airport and Begbroke Science Park also impacting on the Green Belt. The existing road network is already over-stretched in many places, and public services such as the S3 and K2 will struggle to cope with the increased in demand. Oxfordshire County Council are continually undering funding pressure to maintain their existing road networks and facilities. The SHMA has been extensively criticised by individuals, organisations, experts, local politicians and MPs.
123/2	Andrew	Smith	Hampton Gay and Poyle Parish Meeting	Main	34		The housing numbers as proposed in the original draft Local Plan should be reinstated.			The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would be over 40% of the current levels by 2031. Local infrastructure - roads, public services will become over stretched and unable to handle such huge growth. Concerned about how the countryside and environment will be affected. Hampton Poyle is near to the Green Belt between Oxford and Kidlington and no doubt the Plan will increase pressure on tis precious space. Aware that CPRE have engaged professional help to study the basis of the SHMA on which the Plan is based. These studies cast serious doubt on how the SHMA calculates housing need, relative to official government projections and forecasts for new job creation, resulting in a huge overestimate of housing need in Oxfordshire. The SHMA should be independently reviewed.
126/2	Nicky and Patrick	Forsythe		Main	34		The much lower housing numbers as proposed in the original draft Local Plan should be reinstated.			Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40%, a figure to be considered staggering. There could be even more homes to be built in order to meet the needs of Oxford City Council. The District will not cope with this level of growth and concerned about the impact it will have on the environment and the countryside. The road network is already over-stretched, and public services will struggle to meet such a great increase in demand. The SHMA has been extensively criticised by individuals, organisations, experts, local politicians and MPs. It is based on aspirational and unrealistic levels of economic growth. A report from an independent planning expert concludes that the SHMA's estimate is likely to be 'grossley overstated' by a factor of over two. There is not a response to these criticisms.
128/2	Albert and Ann	Prior		Main	34		The housing numbers as proposed in the original draft Local Plan should be reinstated.			Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40%. There could be even more homes to be built in order to meet the needs of Oxford City Council. This would undoubtedly have a very significant impact on the countryside, the road network and the general environment.

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130/2	Robert	McGurrin	Woodstock Action Group	Main	34	SHMA projections are overstated and have not been held to account by public consultation or examination	Re-instatement of the more realistic housing numbers contained in CDC's original draft Local Plan.			The representor objects to all modifications based on the SHMA as they are based on dubious housing need forecasts contained in the 2014 SHMA, which have not been held to account by public consultation or independent examination. Public services, the local network of roads and highways and environmental habitats will not be able to cope with this amount of growth.
133/2	Roger	Davies		Main	34	No robust evidence to justify the increase in housing numbers; the SHMA has been extensively criticised, is based on unrealistic levels of growth and its projections are overstated.	Re-instatement of the significantly lower housing numbers proposed in the original draft.			The representor objects to all modifications based on the 2014 SHMA. The level of growth is unrealistic. Road infrastructure, public services and the environment will not cope with the additional growth. The areas identified are already prone to flooding.
150/2	Fiona	Thomas		Main	34	Objects to modifications based on the SHMA. 22,700 homes represents a 40% increase. Will impact massively on local infrastructure and have a negative effect on people's lives. The SHMA estimate is likely to be grossly overstated.	The original, much lower, housing numbers, should be reinstated.			
164/22	Sarah	Smith	Rapleys LLP / Pandora Trading Ltd	Main	34			The overall housing figures proposed in the Modifications are generally supported, in the context that the proposed increase does now meet the objectively assessed needs of the District. The proposed increase in overall housing numbers is to be managed through the distribution strategy as originally proposed, i.e., concentration of development at Banbury and Bicester with limited increase within the remainder of the district. This is also supported.	Not in relation to these particular modifications. Comments are provided in respect of the Sustainability Appraisal under separate representation.	
166/2	Helen	Marshall	CPRE Oxfordshire	Main	34	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Local Plan should return to the figures and strategy as outlined in the original Submission Document (31 Jan 2014).			The SHMA housing need figures are more than two and a half times those suggested by the Government's own official household projections. The SHMA makes many dubious adjustments to official statistics which add over 60,000 houses to its forecast of need for Oxfordshire. Much of the forecast of need is based on another forecast that 85,000 new jobs will be created attracting more people to move to the County. However much of this figure seems itself just to be based on aspirations to develop more commercial property and it has not been subject to public consultation. The outcome of such a flawed process cannot be accepted as an 'objective assessment of housing need' and over-allocation would present a significant risk to greenfield land. These criticisms have been shared with Cherwell District Council but we are not aware of any reasoned response or any attempt to independently review the SHMA.
166/2	Helen	Marshall	CPRE Oxfordshire	Main	34	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Local Plan should return to the figures and strategy as outlined in the original Submission Document (31 Jan 2014).			Cont.....In recent Planning Inspectorate report (S62A/2014/0001) the Inspector notes 'how essential it is that evidence such as SHMAs must be rigorously tested in order to establish that it is robust' and questions the need to take into account the 'aspirational employment growth' of the Local Enterprise Partnership'. CPRE Oxfordshire therefore considers that the plan is unsound because it is not justified by robust evidence and request that the much lower housing numbers as proposed in the original draft local plan are reinstated.

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171/2	David	Yates		Main	34		request that the much lower housing numbers as proposed in the original draft local plan and based on DCLG population projections, are reinstated			The proposed target for Cherwell would be increased by 40%, a figure that would be unachievable given the current economic climate and recent track record of actual house building delivery by Developers in the District. Infrastructure within Cherwell District would be unable to cope with this level of growth and the negative environment impact would be substantial. The provision of school facilities in rural areas are now unable to meet the local demand as a consequence of inappropriate, unplanned (but won at appeal) developments on productive agricultural fields. The SHMA has been extensively criticised by individuals, organisations, experts, local politicians and MPs. Prof. Alan Wenban-Smith has indicated that: The SHMA housing need figure is more than two and a half times what the Government's official household projections would suggest, making it highly questionable. However much of this figure seems to be based on aspirations to develop more commercial property and it has not been subject to public consultation or independent scrutiny.
178/3	Suzanne	Bangert	Terrance O'Rurke / Mr & Mrs Ashworth	Main	34	We support the proposed increase in housing numbers to meet the SHMA. In particular we support the increase homes to be delivered in rural areas which will support sustainable communities in these areas in accordance with the requirements of the NPPF (paragraph 55)	Amend the proposed housing requirement in Kidlington and the rural areas to 2170 dwellings to reflect the increase in total for whole District		The SA provides no justification for the revised distribution, and no evidence to the position that increased development at former RAF Upper Heyford will meet rural needs.	Support increase in housing provision and early review of local plan. Under the proposed modification Kidlington and the rural areas will only accommodate 17% of the housing growth, compared to 19% in the submitted plan. Small scale development should be facilitated at the villages to meet localized need. The modified plan does not represent positive planning and is contrary to the NPPF. 2170 dwellings are required in the rural areas.
181/2	Lyn	Richards		Main	34		The much lower housing numbers as proposed in the original draft Local Plan should be reinstated.			Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The district will not be able to cope with the population increase envisaged and concerned about the impact this will have on the environment and the countryside. Cannot see how the road network or public services can cope with this great demand. The busy journey from Kidlington to Oxford could take up to 60 minutes to travel 7 miles which will worsen if further developments are to take place.
184/2	John and Pam	Roberts		Main	34		Request that the housing numbers are re-examined after collecting more reliable data and that lower figures, more in accord with the Government's official household projections, are used.			Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40% which will cause social and environmental disturbance. Building on greenfield land would reduce the potential of land to produce food, impact negatively on the natural environment and damaging the quality of the landscape. There has been no public consultation on the housing figures in the Local Plan, nor the SHMA. A report from an independent planning expert concludes that the SHMA's estimate is likely to be 'grossly overstated' as it is more than two and a half times what the Government's official household projections are.

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186/2	Rob	Kinchin-Smith	Banbury Civic Society	Main	34					Objection raised on the forecasts of housing need from the 2014 SHMA due to the following reasons: 1) The complete lack of any local or county-wide public consultation or input; 2) The household projections in the SHMA are a wholesale replacement rather than an adjustment to the official base. At 2.7 times the official government projections, the SHMA numbers are not a reasonable adjustment to official figures; 3) The Local Plan process has been pre-empted by the sheer scale of the housing prjections in the SHMA and the fact that the figures have been prepared without consideration of the environmental implications or infrastructure requirements. The increased housing requirments means that most Oxfordshire Districts will fail to meet the post-SHMA delivery rate, resulting in lasting damage to the planning process in Oxfordshire.
186/2	Rob	Kinchin-Smith	Banbury Civic Society	Main	34					Cont.....The Council should find sites within easy and sustainable commuting distance of Oxford and 'Science Vale' however the strategy of the Plan remains unchanged. All development remains targeted around Banbury and Bicester, with not even organic growth allowed for the villages, which still include Kidlington. Banbury will grow by more than 33% in 15 years, with no additional infrastructure. The southern part of the district is more appropriate for new developments and not at Banbury, Bicester or Former RAF Upper Heyford.
187/2	Alan	Hedges		Main	34		The much lower housing numbers as proposed in the original draft Local Plan should be reinstated.			Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The Submission Local Plan (Jan 2014) was sensible, and a serious attempt to provide a good balance between the need to provide more housing and the need to apply proper planning criteria for a rural area, with a mind to sustainability, transport, the character of communities and protection of the environment. The SHMA has not bee subject to any consultation or independent examination, and the numbers it has come up with are manifestly absurdly high. A critical report from an independent planning expert concludes that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two. An error like this magnitude would clearly have a major bearing on housing numbers for the Plan, but there has not been an official response to the criticisms.

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192/2	Paul	Weaver		Main	34		The housing numbers as proposed in the original draft Local Plan should be reinstated.			Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The Submission Local Plan (Jan 2014) was sensible, and a serious attempt to provide a good balance between the need to provide more housing and the need to apply proper planning criteria for a rural area, with a mind to sustainability, transport, the character of communities and protection of the environment. The SHMA has not been subject to any consultation or independent examination, and the numbers it has come up with are extremely high. A critical report from an independent planning expert concludes that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two. An error like this magnitude would clearly have a major bearing on housing numbers for the Plan, but there has not been an official response to the criticisms.
194/2	Rachael	Blakey	Bucknell Parish Council	Main	34		The housing numbers as proposed in the original draft Local Plan should be reinstated.			Objects to increase in the number of houses proposed to be built in Cherwell as a result of the Oxfordshire Strategic Housing Market Assessment (SHMA). I understand that the plan would increase the total number of houses in Cherwell by 40%, with even more to be added as 'overspill' from Oxford. The District will not be able to cope with this level of growth and there are concerns about the impact it will have on the environment and the countryside. The road network around Bicester is already stretched and without the necessary and significant investment in this infrastructure the situation will only get worse. Concerned about the likely increased traffic flow which will inevitably occur on the Bicester - Ardley Road. The SHMA has been extensively criticised by individuals, organisations, experts, local politicians and MPs. A report from an independent planning expert concludes that the SHMA's estimate is likely to be 'grossly overstated' by a factor of over two.
196/1	Steven	Sensecall	Kemp & Kemp LLP / Leda Properties	Main	34			The increase in housing provision is in-line with the objectively assessed need identified in the joint Oxfordshire SHMA.		
213/2	Shelley	Hopper		Main	34					Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40% in just 17 years. There could be even more homes to be built in order to meet the needs of Oxford City Council. The level of growth is unrealistic and simply unbelievable. Concerned about the irreversible impact it will have on the environment and the countryside. Cannot see how the road network or public services can cope with the levels of population increase envisaged.
214/2	K	Thomas		Main	34					Objection raised on the forecasts of housing need from the 2014 SHMA. The Plan now proposes a much higher housing number than the previous Plan. The total number of houses in Cherwell would increase by 40%. Cannot see how the road network or public services can cope with the levels of population increase envisaged. A critical report from an independent planning expert concludes that the SHMA's estimate is likely to be "grossly overstated" however there is still not a formal response to this.
217/2	Nick	Freer	David Lock Associates / Gallagher Estates and John Colegrave	Main	34			Generally supports the scale and district wide housing provision. This appropriately responds to the level of housing identified in the SHMA.		

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218/1	Jamie	Lewis	Hunter Page Planning / M&G UK PLP	Main	34	Welcome the increase in dwelling requirements however concerned about the housing needs of the rural areas not being met where they arise. There are over 70 town and parish councils within Cherwell but the strategy focuses housing growth at Bicester and Banbury with the rest of the district providing 23.6% of new dwellings. Housing growth is also focused at Former RAF Upper Heyford with 1,600 additional dwellings. Revised distribution will not meet the housing needs of rural areas identified in the SHMA or assist the vitality of Cherwell's sustainable Category A settlements and their satellite villages.	Increase amount of housing to be accommodated in the rural areas outside of former RAF Upper Heyford.			
225/5	Lorna and Ian	James		Main	34		The requirement for Cherwell District to accommodate more housing development should not mean that Bicester is primarily targeted for but development should be spread around in a more balanced approach taking highway and social needs properly into account.			The requirement for Cherwell District to accommodate more housing development should not mean that Bicester is primarily targeted for but development should be spread around in a more balanced approach taking highway and social needs properly into account.
226/3	Clr Catherine	Fulljames	Ploughly Division OCC	Main	34					Further growth at Bicester should not be contemplated.
229/14	Nik	Lyzba	JPPC / The Tripartite (Oxford University, Merton College and R.Smith)	Main	34					The modification takes no account of a strategic review of the green belt, referred to above or an examination in the SA of the benefits of the reasonable alternative of accommodating development in areas currently covered by the green belt designation.
230/6	Jenny	Yates		Main	34					Much of the forecast of need is based on another forecast that 85,000 jobs will be created, attracting more people to the County which is based on aspirations to develop commercial property.
235/5	Simon	Gamage	RPS / Mr Bratt	Main	34					Concern over the strategy to locate most new development at Banbury and Bicester. More development should be located in the rural areas. The allocation of only 750 dwellings in the rural area is not sufficient and does not take account of market signals.
249/2	Judy	East		Main	34	Objects to modifications based on the SHMA. 22,700 homes represents a 40% increase. Unsustainable and will impact on quality of life, green space, wildlife habitats, road network and public services. Beggars belief that more houses are likely to be provided to meet Oxford's needs. The SHMA has been extensively criticised and has a need figure more than 2.5 times official household projections. It is based on the forecast that 85,000 new jobs will be created. The SHMA estimate is likely to be grossly overstated.	The original, much lower, housing numbers, should be reinstated.			
252/2	Ian	Gillespie	Carter Jonas / of the Oxford Diocesan Board of Finance	Main	34	The Plan is not making full and effective provision for housing away from Banbury and Bicester. The Plan places significance reliance on urban extensions over a sustained period. Endorse the overall strategy but have concerns about required delivery rates. Developers will want to retain strong sales values and will not want the market at the towns to be saturated.	A more flexible approach is needed			
256/1	Mr & Mrs	Facon		Main	34	Housing provision in the rural parts of the district should be increased, particularly if Oxford's needs have to be accommodated, with greater clarity on the distribution to the most sustainable villages such as Bloxham. The reliance on non-strategic sites to be delivered through the Local Plan Part 2, Neighbourhood Planning and planning applications does not give certainty nor necessarily direct it to the most sustainable locations. How will homes be apportioned? There should be strategic allocations rather than the general figure in Policy Villages 2	Housing provision in the rural parts of the district should be increased. Policy Villages 2 of the Plan to revert back to identifying and allocating housing in the rural villages as per Table 5 of the Submission Version of the Local Plan. Strategic allocations in the rural areas including at Bloxham			Generally support the amendments to Policy BSC1 and the key overarching strategy
272/2	Kevin	Ayrton	Carter Jonas / Pain family	Main	34	The continued focus on Banbury and Bicester is supported, but there are concerns in relation to the achievability of required delivery rates.	A more flexible approach to delivery in the rest of the district is required to address this risk and respond to the opportunity to deliver sustainable development.			
279/2	S	Ryan		Main	34	The level of growth now proposed is unrealistic and will have an irreversible impact on the environment. The road network and public services will be unable to cope with the population increase. The SHMA has been seriously criticised by individuals, organisations, experts, local politicians and MPs. An independent planning expert concluded the SHMA estimate is likely to be overstated by a factor of 2.				

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280/2	V	Webster		Main	34	The increase in housing is a ridiculous amount and will be most damaging to the Green Belt which is so important to Kidlington. Fields behind the Moors and Webbs Way are precious to local people. 8 new properties are already being built in the Moors. The ex prison officer's club (now nursery), car park and tennis club next to Campsfield House are to be sold and if developed will be a loss for Kidlington residents.	The lower housing numbers contained in the original plan should be re-instated.			
281/2	Alison	Urwick		Main	34	The increase in housing is completely unsustainable in terms of its impact on the environment, communities, roads, water and other services including schools. The SHMA has been widely criticised and the housing need figure is more than two and a half times the government's official housing projections, making it highly questionable. The SHMA has not been subject to public consultation or independent scrutiny.	The lower housing numbers contained in the original plan should be re-instated.			
283/2	Ann	Taylor		Main	34	The increase in housing is unrealistic and the district could not cope with this level of growth; the road network and other services are already overstretched. The SHMA has been widely criticised and the housing need figure is likely to be overstated by a factor of two. The SHMA requires further scrutiny and public consultation before it can be accepted.	The much lower housing numbers proposed in the original draft local plan should be re-instated.			
288/2	Judy	Hall		Main	34	Objection is made to the large increase in housing numbers as a result of the SHMA and the resultant impact on the environment and already congested road network.	Lower housing numbers from the original draft local plan should be re-instated.			
289/2	H and H M	Mapp		Main	34	Objection is made to the large unrealistic increase in housing numbers as a result of the SHMA and the resultant impact on Kidlington and the surrounding area, which will be devastating to the environment and welfare of existing residents. Many reputable organisations and experts have concluded that the SHMA's estimate of need is grossly over exaggerated.	The much lower estimates of the original local plan should be re-instated.			
290/2	Stephen	Willott	Bicester Green Gym	Main	34	The increased housing provision will have a negative impact on the environment, especially the countryside as greenfield sites around Banbury and Bicester are developed. This will negatively effect and disrupt local ecology, contrary to the NPPF and CDC policy ESD10. The SHMA has been much criticised with claims that need is likely to be overestimated by a factor of 2. There has been no rebuttal of these criticisms and as such the increase in housing is not justified by robust evidence.	The much lower estimates of the original local plan should be re-instated as this will relieve the detrimental effects on the local environment.			
293/2	Wendy	Wright		Main	34		Put fewer houses in the Local Plan			Object to modifications 28 and 34 in the LP and all other modifications which are based on the forecasts of housing need in the SHMA. I understand that in response to the SHMA, the LP now shows that by 2031, the total number of houses in Cherwell would increase by 40% and in Bicester, by 47%, causing major disruption to every community in this district. A report by Professor A Wenban-Smith for CPRE finds that these horrendous SHMA figures are likely to be overestimated by a factor of two. Development will have negative impact on countryside landscape around Bicester and Banbury, as many greenfield areas are designated as strategic sites e.g. Bicester 13 - Gavray Drive, and Bicester 12. The LP is unsound and does not comply with NPPF Core Planning Principle.
303/2	Sarah and Stephen	Moffatt		Main	34	Objection raised to any proposal to allow more housing in rural areas to meet the supposed needs of the City of Oxford. The SHMA has not been subjected to any independent verification of numbers. Until an independent review of the SHMA is carried out it should not be referenced and the Local Plan should continue to use the original figures.	The housing numbers as proposed in the original draft Local Plan should be reinstated.			

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306/1	Ian	Jewson	Ian Jewson Planning Ltd / Messrs King and Warr	Main	34	<p>Welcome increase in overall housing provision of the Plan as set out at Modification 34. Object to the changes as they do not appear to be based on a proper understanding of how the objectively assessed need for the area will be delivered in over the plan period.</p> <p>Oxford City will be unable to meet its identified need and therefore a wider strategic planning exercise is required. The proposed approach appears to take an inward facing approach to delivery in the short term whilst promising an early review to consider housing need more widely.</p> <p>Proposed changes seem rushed and fail to give proper regard to cross-boundary issues. This is likely to result in under delivery and over time will increase the affordability gap in the area.</p> <p>To ensure plan requirements are deliverable the Proposed Modifications should identify sufficient sites to meet the housing need consistently over the plan period. This will ensure the Council's previous record of persistent under delivery is not continued in the future. Proposed modifications should further consider a greater allowance for nonstrategic housing sites at sustainable locations such as Banbury.</p>	<p>Delay adoption of the plan until greater certainty exists as to how housing needs across the market area are to be addressed.</p> <p>Further consideration should be given to other available sites within Banbury to meet the area's housing needs, including land south of Broughton Road, Banbury.</p>			
314/2	Alex	Duncan		Main	34	<p>Object to modifications 28, 34 and all other modifications which are based on forecasts of housing need from the 2014 SHMA. Consider the SHMA estimated need for a 40% increase in housing in Cherwell in 17 years unrealistic.</p> <p>District cannot cope with level of growth proposed. Impact on environment, public services and road network.</p>	Use lower housing figures from the Submission Version			
315/2	John and Hilary	Maddicott		Main	34	<p>Object to modifications 28, 34 and all other modifications which are based on forecasts of housing need from the 2014 SHMA. Consider the SHMA estimated need for a 40% increase in housing in Cherwell in 17 years unrealistic.</p> <p>District cannot cope with level of growth proposed. Impact on countryside, environment, public services and road network.</p>	Use lower housing figures from the Submission Version			
036/2	Rachel	Rahman		Main	34		Lower housing numbers as proposed in the original draft local plan should be reinstated.			Objection to Modifications no. 28 and 34 relating to Policy BSC1, the Oxfordshire SHMA and Housing Allocations and to all other modifications based on the SHMA. The total number of houses in Cherwell would increase by 40%, a figure I consider to be staggering. I also understand that even more houses are likely to be proposed in order to meet the supposed needs of the City of Oxford. Such a level of growth is not credible or realistic which means that the plan will be ineffective. Impact on the environment, countryside and road network. SHMA It is based on aspirational and unrealistic levels of economic growth. A report from an independent planning expert concludes that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two.
061/10	Alan	Lodwick		Main	34	The consequence of adopting the figures will be to make available more sites than are needed and the developers will select the most profitable sites to develop.	The number of houses proposed in the original submission local plan should be re-instead, as the modifications are unsound.			
061/11	Alan	Lodwick		Main	34	It will also be more difficult for the Council to demonstrate a 5 year land supply and will lead to further speculative applications and make the Local Plan ineffective.	The number of houses proposed in the original submission local plan should be re-instead, as the modifications are unsound.			
061/12	Alan	Lodwick		Main	34	The Council has not demonstrated that infrastructure in the District will be able to cope with the demands implied by the increased housing numbers. There will be delays and gridlock particularly in the south of the District. The rates of growth being proposed are not sustainable. It will lead to damage to the environment. It has not been prepared based on a proper objective assessment of needs nor does it contribute to sustainable development. The Plan has not been positively prepared.	The number of houses proposed in the original submission local plan should be re-instead, as the modifications are unsound.			

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61/13	Alan	Lodwick		Main	34	The report by Professor Alan Wenban-Smith shows that the SHMA estimates are grossly overestimated. They are two and half times the government's official projections and the SHMA makes dubious adjustments to official statistics using very sensitive multipliers. The assessment is based on a forecasts in the SEP which are aspirational and promoted by those with an interest in commercial property. This report was available to the Inspector for the hearings.	The number of houses proposed in the original submission local plan should be re-instead, as the modifications are unsound.			
061/14	Alan	Lodwick		Main	34	An Inspector is quoted as saying that LEP employment growth forecasts should not be considered in the construction of Strategic Housing Market Assessments and should be thoroughly tested.	The number of houses proposed in the original submission local plan should be re-instead, as the modifications are unsound.			
061/6	Alan	Lodwick		Main	34	The direction by the Inspector to the Council to use the housing numbers from the SHMA was without any serious discussion about the validity of the SHMA, even though some organisations had expressed concerns about it in their submissions. There would have not been any previous objections to the use of the SHMA figures as they did not form part of the Submission Local Plan. The Inspector appears to have prejudged the issue and therefore it is hard to see how any impartial Examination can continue. The fairness and openness of the consultation on the Local Plan is in serious doubt.	A quote from Sir Tony Baldry is provided in the representation and it is suggested that the process suggested by Tony Baldry for the examination is adopted.			
061/7	Alan	Lodwick		Main	34	The fact that the housing figures have increased so dramatically since the previous forecasts on which the Local Plan was based (670 per year) raises serious questions about the validity of the SHMA forecasts. It cannot be reasonable to set long term rates for new house building solely on the basis of such volatile estimates.	The number of houses proposed in the original submission local plan should be re-instead, as the modifications are unsound.			
061/8	Alan	Lodwick		Main	34	If the new homes are provided this will mean a potential 50% in housing stock in Cherwell.	The number of houses proposed in the original submission local plan should be re-instead, as the modifications are unsound.			
061/9	Alan	Lodwick		Main	34	The SHMA forecast is not credible and realistic. The increase in housing stock between 2001 and 2011 was 5,000 homes (or about 500 year) which suggests a rate of 670 year is a much better assessment.	The number of houses proposed in the original submission local plan should be re-instead, as the modifications are unsound.			
062/2	A and R	Dixon		Main	34					Object as the addition of 40% housing in 17 years is unsustainable and will put pressure on the local infrastructure
068/3	Rosemary	Lodwick		Main	34	Objects in the strongest possible terms to modifications 28, 34 and all other modifications which are based on the forecasts of housing need from the 2014 SHMA. The modifications are unsound. The Plan now proposes that 22,700 houses should be built in Cherwell by 2031, many more than proposed in the original draft plan. The total number of houses in Cherwell would increase by 40%, a figure considered to be astonishing. Even more houses are likely to be proposed in order to meet the supposed needs of the City of Oxford. Such a level of growth is not credible or realistic which means that the plan will be ineffective. How will the District be able to cope with this level of growth and it will have an impact on the environment, the countryside as well as on the historic centre of Oxford. How will the road network, which is already over-stretched, and public services be able to meet such a great increase in demand. The SHMA was produced by a firm who, as well as doing planning work, act for leading developers. The document must therefore be considered tendentious, and judged with scepticism. The SHMA has been extensively criticised by individuals, organisations, experts, local politicians and MPs. It is based on aspirational and unrealistic levels of economic growth. A report from an independent planning expert concludes that the SHMA's estimate is likely to be "grossly overstated" by double.	Request that the much lower housing numbers proposed in the original draft local plan are reinstated.			

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069/2	Kevin	Allen		Main	34	The Local Plan now proposes that 22,700 houses should be built in Cherwell by 2031, many more than proposed in the original draft plan. The total number of houses in Cherwell would increase by 40%, a figure which is completely unsustainable and unjustifiable. Even more houses are likely to be proposed in order to meet the supposed needs of the City of Oxford. How will the District be able to cope with this level of growth and it will have an impact on the environment, public services and current residents well-being. How will the road network, which is already over-stretched in many places, and public services meet such a great increase in demand. The SHMA housing need figure is more than 2.5 times what the Government's official household projections would suggest, making it highly questionable. The forecast of need is based on a forecast that 85,000 new jobs will be created. However, much of this figure seems to be based on aspirations to develop more commercial property which has not been subject to public consultation or looked at in detail independently. This report prepared by an independent planning expert concludes that the SHMA's estimate is likely to be "grossly overstated" by a factor of over two. The plan is unsound because it is not justified by robust evidence.	Request that the much lower housing numbers proposed in the original draft local plan are reinstated.			
070/2	David	Gilmore		Main	34					The objector is appalled by the proposals particularly to modifications 28 and 34 and how the SHMA figures have been calculated. The SHMA suggests that these are required for the thousands of people coming into the county to work, but there is little indication where all these jobs are coming from. Not even the Government believes that employment in Oxfordshire is going to grow to quite such an extent.
076/2	Clr Mike	Gotch		Main	34					There could be a new development at Shipton on Cherwell on a smaller scale to Upper Heyford, perhaps planned around the lake.
076/3	Clr Mike	Gotch		Main	34					Oxford needs many new dwellings, particularly on the northern side close to the Northern Gateway site.
179/32	Matthew	Bates	Oxford City Council	Main	34	The introduction of new supporting text to Policy BSC1: District Wide Housing Distribution and under the introductory section titled 'Duty to Cooperate' provides no meaningful commitment by Cherwell to an early Plan review to address the wider objectively assessed housing needs of the housing market area. In particular, there is no proper mechanism for this to happen. Rather the approach set out provides an inordinate scope for delay. This does not reflect the urgent need to boost housing need and compensate for past housing delivery, and is contrary to the NPPF requirements on effective, outcomes-based cross-boundary working. Additional text in Policy BSC1 is required to provide a mechanism for early review of the Cherwell Plan to make provision for a portion of Oxford's unmet need, as identified in the SHMA 2014, as well as potential	Amend Policy BSC1 to read as follows: Policy BSC 1 District Wide Housing Distribution Cherwell district will deliver a wide choice of high quality homes by providing for 22,840 additional dwellings between 1 April 2011 and 31 March 2031. 1,106 completions were recorded between 2011 and 2014 leaving 21,734 homes to be provided between 2014 and 2031. <u>The figures below are interim, pending an early review of this Plan.</u> Housing will be delivered in accordance with the requirements set out below... [after table...] <u>An early review of the Cherwell Local Plan 2011-31 Part 1 will review the housing target and strategic site allocations as set out in Policy PSD2. If such a review is not completed within the timescales specified in Policy PSD2, Policy BCS1 will be considered out-of-date as set out in paragraph 14 of the NPPF, and therefore no longer material under Section 38(6) of the Planning and Compulsory Purchase Act 2004. In this event, all planning applications submitted on or after the date which is 2 years following the date of adoption of this Plan will be considered against the NPPF and Presumption in favour of Sustainable Development.</u>			

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179/33	Matthew	Bates	Oxford City Council	Main	34	There is wholly inadequate evidence of deliverability of the larger quanta of housing and employment proposed to support the increases in the locations proposed. Some of the proposed modifications directly contradict the evidence presented by Cherwell Council in the examination on deliverability and market capacity. There is no evidence that account has been taken of past trends, market indicators and lack of planned infrastructure. Therefore the Plan is not effective, and hence unsound. A 5 year housing supply could not be met on the basis of the current strategy.				
179/34	Matthew	Bates	Oxford City Council	Main	34	The strategy is not considered to be the most appropriate alternative when judged against sustainability criteria. A significant increase in development in rural areas, including in effect a new settlement at Upper Heyford, is not justified as the most sustainable option. At least one reasonable alternative (urban extension to the north of Oxford) has been excluded from consideration from the outset. The Sustainability Appraisal Addendum has also excluded this reasonable alternative and therefore fails to comply with the SEA Directive.				
301/2	Bev	Hindle	Oxfordshire County Council	Main	34					Oxfordshire County Council (OCC) supports the main modifications update the plan base date from 2006 to 2011 to cover the period 2011-2031. This aligns with the evidence of housing need in the Oxfordshire Strategic Housing Market Assessment (SHMA).
301/3	Bev	Hindle	Oxfordshire County Council	Main	34					Oxfordshire County Council supports the main modifications which distribute the additional housing to sites which accord with the submitted local plan spatial strategy; this focuses development on the two main towns of Bicester and Banbury plus Upper Heyford, with minor development within the most sustainable villages. In principle this is a sustainable approach, provided essential supporting infrastructure can be funded and delivered by development in a timely way.
047/13	Matthew	Coyne	Banbury Town Council	Main	35					Supports the development of the brownfield site at Canalside, Bolton Road, Spiceball and Higham Way.
191/8	Michael	Robson	Cerda Planning Ltd / CALA Homes (Midlands) Ltd	Main	35					This is clear that the Council will strive to ensure that important brownfield schemes are delivered notwithstanding that large areas of greenfield land is being allocated. It is important not to suggest that this is a brownfield first policy.
259/15	Paul	Burrell	Pegasus Group / The Dorchester Group	Main	35			The modification seeks to secure development on a number of previously developed sites, including Former RAF Upper Heyford. The emphasis on brownfield development is an appropriate strategy and should be applied to deliver additional development at the Former RAF Upper Heyford site.		
047/14	Matthew	Coyne	Banbury Town Council	Main	36					Support density of at least 30 dwellings per hectare.
191/9	Michael	Robson	Cerda Planning Ltd / CALA Homes (Midlands) Ltd	Main	36		Additional sites such as Land at Fringford Road, Bicester should be allocated to meet the housing requirements.			The proposed change to state that Policy BSC 2 will seek to provide housing at a net density of at least 30 dwellings per hectare seems too high in the context of the need to deliver family housing, bungalows for the elderly, and the need to incorporate strategic landscape buffers, open spaces, etc. Recent evidence indicates that this level of density, particularly on edge of settlement locations which is where the greater majority of proposed allocations within the Plan are to be found, will not be achieved.
258/8	Craig	Barnes	Gladman Developments	Main	37	This implies a preference towards proposals on previously developed land over greenfield sites.	The wording will need to be amended to be in common with the NPPF.		No comment	

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198/3	Huw	Mellor	Kemp & Kemp / Newcore Capital Management	Main	38		Land at Bletchingdon Road, Islip should be allocated for development.			Site - Land at Bletchingdon Road, Islip. The Council should consider this site for housing development which is brownfield land in a sustainable location within the Green Belt. The site measures approximately 13.5ha and could accommodate approximately 50 dwellings.
259/16	Paul	Burrell	Pegasus Group / The Dorchester Group	Main	38			The emphasis on encouraging the re-use of previously developed land is supported.		
166/52	Helen	Marshall	CPRE Oxfordshire	Main	39	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			
235/9	Simon	Gamage	RPS / Mr Bratt	Main	39					Objects to continuing reference to the 2012 SHMA.
061/15	Alan	Lodwick		Main	39	Objects to the use of the SHMA figures.	All Modifications relating to the SHMA should be deleted.			
179/35	Matthew	Bates	Oxford City Council	Main	39	Retained text still refers to the 'Strategic Housing Market Assessment Review and Update 2012,' which concluded a figure of 300 homes per year, using an assumption that the Private Rented Sector (PRS) was capable of accommodating some of this need. The City Council objects to this approach, as it appears to distance Cherwell from the SHMA 2014. It is not appropriate to refer to the Private Rented Sector as meeting affordable housing needs. A reduction in the assessed need in Cherwell may have repercussions on the wider housing market, including Oxford.	Delete references to the 'Strategic Housing Market Assessment Review and Update 2012,' and delete the lower alternative of 300 dpa needed in favour of the 407 figure.			
047/15	Matthew	Coyne	Banbury Town Council	Main	40					Support for affordable housing targets as concluded in the 2014 SHMA.
186/6	Rob	Kinchin-Smith	Banbury Civic Society	Main	41					Policies on housing mix are to be applauded, but this should apply equally to the existing housing stock as to new build. Despite previous policy presumptions encouraging the sub-division family homes into bedsits and flats, Banbury retains a number of attractive small and medium-sized family homes. Further attrition of these should be discouraged.
097/5	Sue	Mackrell	Bicester Town Council	Main	44	Would like to be assured that sufficient health care facilities will be provided to cater for the increased number of residents that the additional housing will attract.				
301/42	Bev	Hindle	Oxfordshire County Council	Main	44					OCC supports the modifications to Policy BSC4 (Housing Mix) in relation to an increase in demand for specialist housing.
301/57	Bev	Hindle	Oxfordshire County Council	Main	44	These modifications acknowledge that the growing numbers of older people and higher levels of disability amongst older people will lead to an increasing demand for specialist housing. Reference is also made in policy BSC4 to specialist housing for people with disabilities.	These modifications are supported. They reflect the importance of increasing the supply of specialist housing for older people and people with disabilities.			
097/6	Sue	Mackrell	Bicester Town Council	Main	45	Would like to be assured that sufficient health care facilities will be provided to cater for the increased number of residents that the additional housing will attract.				
166/53	Helen	Marshall	CPRE Oxfordshire	Main	45	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			
206/3	Julia	Mountford	Boyer Planning / Redrow Homes and Wates Developments	Main	45		In addition to the second paragraph, confirmation that the Council will take a flexible approach to considering the appropriate mix of units on sites to take account of market signals and respond to market requirements would be welcomed.			

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229/15	Nik	Lyzba	JPPC / The Tripartite (Oxford University, Merton College and R.Smith)	Main	45					Policy BSC4 could usefully include reference to a positive approach being taken by the Council towards key worker housing which may be justified in relation to existing or proposed employment development
061/16	Alan	Lodwick		Main	45	Objects to the use of the SHMA figures.	All Modifications relating to the SHMA should be deleted.			
159/4	Simon	Ruston	Ruston Planning Ltd	Main	46	The reasons / criteria for the categorisation of 'A' and 'B' villages are unclear	Removal of the sequential test for travelling distances to category A and Category B villages			
047/16	Matthew	Coyne	Banbury Town Council	Main	47					Objects to reduction of housing numbers from 950 to 700 on the Canalside site. Object to no provision being made for a school site. New development will increase pressure on existing schools, and infrastructure.
097/7	Sue	Mackrell	Bicester Town Council	Main	47	Plans for additional primary and secondary schooling are welcome but would like to see supporting documentation to ensure these will provide sufficient capacity given the additional housing planned and that provision will be made at the appropriate time.				
301/34	Bev	Hindle	Oxfordshire County Council	Main	47					Combined with the growth of the town's existing school population, the level of new housing growth proposed for Banbury will require significant expansion of the town's secondary school capacity. Whilst options are still being explored, much of the new capacity is expected to be met through extensions to existing schools. In addition to this, a new establishment is also likely to be needed during the plan period.
301/35	Bev	Hindle	Oxfordshire County Council	Main	47					The need for a new secondary school is acknowledged in the proposed additional supporting text to Policy BSC 7 (Meeting Education Needs) in Modification 47. Since the proposed modifications were published, further joint working with CDC has taken place to identify a potentially suitable site. Whilst the County Council's preference would be to have a site on the eastern / north eastern side of Banbury, no such site is available at present. The best available option at this stage is to reserve 8.42 hectares of land within the proposed Banbury 12 site (Land for the relocation of Banbury United FC) for a new secondary school in order to meet town wide needs. In addition to this, amendments to Policy Banbury 17 (South of Salt Way – East) will also be needed to accommodate the extension of one of the existing secondary schools (Blessed George Napier). The Council will provide evidence in a Statement of Common Ground for the examination, if required.
301/36	Bev	Hindle	Oxfordshire County Council	Main	47					Primary provision - Action is already underway to expand St Edburg's Primary School and Longfields Primary School. These actions have been taken to provide additional capacity ahead of housing, and developer contributions are being sought/secured towards these expansions. Further primary provision will be required as set out in Annex 2 and contributions will be sought from development. Secondary provision - There continues to be a requirement for a new 600 place school on SW Bicester and a new secondary school for NW Bicester, as well as the proposed Studio School and the Heyford Free School. On the information currently available, a suggested timetable of school expansion is set out in Annex 2. Modification 88 SE Bicester states: "Primary School- to include land for the provision of a school on site and contributions to secondary education provision." The development will need to provide the whole primary school, not just the site. Suggested amended wording is set out in the Table of Detailed Comments below.

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301/37	Bev	Hindle	Oxfordshire County Council	Main	47					Primary provision - Action is already underway to expand Queensway Primary School, Dashwood Primary Academy, Hill View Primary School and Hanwell Fields Primary School. These actions have been taken to provide additional capacity ahead of housing, and developer contributions are being sought/secured towards these expansions. A feasibility study is also underway into the potential for William Morris School to expand. Further primary provision will be required as set out in Annex 2 and contributions will be sought from development. Secondary provision – Combined with the growth of the town’s existing school population, the level of new housing growth proposed for Banbury will require significant expansion of the town’s secondary school capacity. It is anticipated that by the early 2020s an additional 800 secondary places will be required and that by the early 2030s this will have risen to 1,200 places. Much of this is expected to be met through extensions to existing schools but a new establishment is also likely to be needed during the plan period.
301/37	Bev	Hindle	Oxfordshire County Council	Main	47					Cont.....Modification 47 acknowledges the need for a new secondary school in the proposed additional supporting text to Policy BSC 7 (Meeting Education Needs) and is supported. Since the proposed modifications were published, further joint working with CDC has taken place to identify a potentially suitable site for allocation within the Plan. This work has concluded that 8.42 hectares of land should be reserved within the proposed Banbury 12 site (Modification 114: Land for the relocation of Banbury United FC) for a new secondary school of up to 1,200 places to meet town wide needs. Should this area of land be allocated, access through Banbury 4 (Bankside Phase 2) would need to be safeguarded and specified in the Banbury 4 site policy. In the event that the site is not required for education purposes, it could remain as playing fields. Modification 120 (Banbury 17: South of Salt Way – East) In order to facilitate the extension of Blessed George Napier Secondary School, it is requested that this policy is amended to provide 2.855 hectares of land for playing fields immediately south of the school. This would compensate for building on the school’s existing playing fields in order to extend the facility to an up to 1,400 place school. There could be potential for shared use of the playing fields with the primary school needed for this development. Access arrangements from this development to the school will also need to be considered, including a potential pupil drop off and pedestrian / cycle access over the Salt Way. Should the extension of Blessed George Napier Secondary
301/37	Bev	Hindle	Oxfordshire County Council	Main	47					Cont.....Modification 120 (Banbury 17: South of Salt Way – East) In order to facilitate the extension of Blessed George Napier Secondary School, it is requested that this policy is amended to provide 2.855 hectares of land for playing fields immediately south of the school. This would compensate for building on the school’s existing playing fields in order to extend the facility to an up to 1,400 place school. There could be potential for shared use of the playing fields with the primary school needed for this development. Access arrangements from this development to the school will also need to be considered, including a potential pupil drop off and pedestrian / cycle access over the Salt Way. Should the extension of Blessed George Napier Secondary School referred to above not be possible, it is requested that the policy wording allows for the option of using the 2.855 hectares of land for a Studio School or University Technical College (UTC).

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301/38	Bev	Hindle	Oxfordshire County Council	Main	47					Modification 157 – Policy Villages 5, Upper Heyford: this states " This site will provide for a settlement of approximately 1,600 dwellings (in addition to the 761 dwellings (net) already permitted) and necessary supporting infrastructure, including a primary school". The on-site school is actually an all-through primary & secondary school. Additional primary and secondary education provision will be required to reflect the higher housing numbers. It is suggested that the wording in the 'Development Description' should therefore be amended to reflect this. Suggested wording is attached in the Table of Detailed Comments.
301/58	Bev	Hindle	Oxfordshire County Council	Main	47	The recognition that there is a need for a new secondary school in Banbury to meet the needs of local population growth is supported				
301/43	Bev	Hindle	Oxfordshire County Council	Main	49					The modifications to Policy BSC9 (Public Services and Utilities) in relation to the requirement for all new developments to include provision for connection to Superfast Broadband are also supported.
301/59	Bev	Hindle	Oxfordshire County Council	Main	49	The modification proposes that all new developments include provision for connection to Superfast Broadband.	This modification is supported. It reflects the emerging joint working across all districts to proactively plan for Superfast Broadband connections.			
047/17	Matthew	Coyne	Banbury Town Council	Main	51					Development of strategic housing sites are likely to impose on and coalesce with the surrounding villages e.g. Bodicote.
137/4	Theresa	Goss	Adderbury Parish Council	Main	51	The alteration to the green buffer is not positive and implies that coalescence between Banbury and the villages is the ultimate objective.				
144/5	Theresa	Goss	Bloxham Parish Council	Main	51	Blurring of the lines which define a village boundary. This modification would make it difficult to identify where the line is between the urban rural fringe and the green buffer and would always be open to movement and redefinition. Therefore open to developers moving the line.	Revert to a feature that is recognisable to prevent coalescence of towns into villages and villages into each other. A green field barrier between villages.			
191/10	Michael	Robson	Cerda Planning Ltd / CALA Homes (Midlands) Ltd	Main	51		Policy ESD 15 should be deleted.			Policy ESD 15 creates an area of restraint to development and is in direct conflict to the positively prepared approach to policy making. The approach adopts a blanket policy, which results in an unnecessary layering of policy constraints that fetters future sustainable extensions, for example to Bicester, from coming forward to meet the full objectively assessed needs of the District. Additional land is required to deliver housing in the District but it is difficult to see how this can be accommodated at sustainable locations when a blanket green buffer policy is applied. Green buffers on the edge of Bicester are not justified.
206/8	Julia	Mountford	Boyer Planning / Redrow Homes and Wates Developments	Main	54					The modification makes reference to any "additional guidance required" which may have taken account of the previous representation that "The implications at this stage are that allowable solutions would be considered under Building Regulations". Confirmation that this is the case would be welcomed.
301/60	Bev	Hindle	Oxfordshire County Council	Main	55	Policy ESD 2 – Energy hierarchy The modification reflects changes to national policy.	The modification is supported.			

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197/2	David	Keene	David Lock Associates / Gallagher Estates	Main	57	Nationally described standards are now the appropriate way forward. The requirements of ESD3 are imposing a heightened local standard contrary to NPPF guidance and evidence of soundness. The requirement for a specific standard which is wider than national mandatory standards can only be expressed as aspiration which is subject to negotiation in the light of the wider specific circumstances. For a local planning authority to depart from national standards should be rare on only on the basis of a full understanding of costs and technical matter. This is not available in the evidence base accompanying the Plan. There is no evidence base to draw the distinction that indicates that strategic site allocations, with all of the additional infrastructure and development costs associated with them, should themselves support enhanced standards and costs of development.	Substantial sections of ESD3 should be revised (Text amendments provided).			
206/9	Julia	Mountford	Boyer Planning / Redrow Homes and Wates Developments	Main	57		The policy should be deleted in its entirety. The policy should not replicate other emerging legislation.			Reference to the Code for Sustainable Homes has been deleted from the policy which is welcomed. Some alterations to the policy would be welcomed due to the likely abolition of both the Code for Sustainable Homes from April 2015 and also BREEAM. The Written Ministerial Statement on Building Regulations with a supporting note (13 March 2014) makes it clear that standards for energy efficiency are to be set by Building Regulations and not through planning policy. The policy refers to 'zero carbon development' is an example of why the policy should not replicate other emerging legislation. Zero carbon goes beyond the requirements of the emerging legislation.
268/1	Darren	Bell	David Lock Associates / Hallam Land Management	Main	57	The requirements of Policy ESD3 are imposing a heightened local standard contrary to NPPF guidance. The requirement for a standard wider than national standards can only be an aspiration, subject to negotiation, and should only be on the basis of a full understanding of costs and technical matters. This is not contained in the evidence base, in particular the distinction that strategic sites should support enhanced standards.	ESD 3 should be revised: All new residential development will be expected to incorporate sustainable design and construction technology to achieve zero carbon development through a combination of fabric efficiency, carbon compliance and allowable solutions in line with current Government policy. Cherwell District is in an area of water stress and as such the Council will seek a higher level of water efficiency than required in the Building Regulations, with developments achieving a limit of 110 litres/person/day. All new non residential development will be expected to meet at least BREEAM "Very Good" with immediate effect, subject to review over the plan period to ensure the target remains relevant. The demonstration of the achievement of this standard should be set out in the energy statement. The strategic site allocations identified in this Local Plan are expected to reflect exemplary contributions to carbon emissions and to wider sustainability. All development proposals will be encouraged to reflect high quality design and high environmental standards, demonstrating sustainable construction methods including but not for instance in relation limited to: minimising both energy demands and energy loss, Maximising passive solar lighting and natural ventilation, Maximising resource efficiency.....			

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268/1	Darren	Bell	David Lock Associates / Hallam Land Management	Main	57	The requirements of Policy ESD3 are imposing a heightened local standard contrary to NPPF guidance. The requirement for a standard wider than national standards can only be an aspiration, subject to negotiation, and should only be on the basis of a full understanding of costs and technical matters. This is not contained in the evidence base, in particular the distinction that strategic sites should support enhanced standards.	Cont..... incorporating the use of recycled and energy efficient materials; Reducing waste and pollution and making adequate provision for the recycling of waste, Making use of sustainable drainage methods, Reducing the impact on the external environment and maximising opportunities for cooling and shading (by the provision of open space and water, planting, and green roofs, for example); and Making use of the embodied energy within buildings wherever possible and re-using materials where proposals involve demolition or redevelopment. <u>The Local Planning Authority will take account of the feasibility and practicality of the proposals having regard to nationally prescribed standards, deliverability and wider infrastructure and planning obligations sought in relation to development schemes. Should the promoters of development consider that individual proposals would be unviable with the above requirements, open book financial analysis of proposed developments will be expected so that an in-house economic viability assessment can be undertaken. Where it is agreed that an external viability assessment is required, the cost shall be met by the promoter.</u>			
301/61	Bev	Hindle	Oxfordshire County Council	Main	57	Policy ESD 3 – Sustainable Construction These changes reflect national policy.	The modification is supported.			
191/11	Michael	Robson	Cerda Planning Ltd / CALA Homes (Midlands) Ltd	Main	58		Explanation of this change is needed.			The threshold for the feasibility statement for DH/CHP has been significantly reduced from 400 dwellings to 100 dwellings with no explanation provided.
197/3	David	Keene	David Lock Associates / Gallagher Estates	Main	58	The lower threshold and indeed requirement to consider CHP will delay and frustrate strategic sites from coming forward for development. The reduction in the threshold highlights the lack of evidence to support what could be a relatively onerous requirement to carry out feasibility studies. In the light of the proposed modification we consider that the policy should be deleted. Certainly there should be no general expectation of a feasibility assessment for all strategic developments.	Delete Policy			
206/10	Julia	Mountford	Boyer Planning / Redrow Homes and Wates Developments	Main	58		The criteria for the policy should use the heat mapping densities so that opportunities are not missed for decentralised energy, but additionally, where it is clear that it would be unviable to provide decentralised energy due to insufficient heat being produced from a development, then abortive work is not carried out.			There appears no update to the evidence base to support this alteration to the policy as the Background Paper on Policies ESD 1-5 previously referred specifically to 400 dwellings. There is no indication that the Local Plan Viability Update Executive Summary has revisited this aspect of the policy. There is no evidence to demonstrate that South East Bicester would meet the minimum threshold heat density to enable District Heating or Combined Heat and Power to be a viable option on this site. Developers can make a decision based on the market at the time when considering future Building Control requirements, in terms of energy efficiency and sustainability.
208/5	Alice	Kirkham	Persimmon Homes and Charles Church Midlands	Main	58	The modification will add significant delay and cost to proposals for new housing developments and is considered to be inconsistent with national policy which is seeking to bring forward a set of national standards which will provide consistency, rather than each individual local authority having their own set of local standards.	This requirement should be deleted from the Plan.			
268/2	Darren	Bell	David Lock Associates / Hallam Land Management	Main	58	The justification given for lowering thresholds for district heating and CHP from 400 to 100 is to reflect the new strategic site threshold. It is extremely unlikely that proposals of that scale will be able to provide district heating or CHP; such schemes have been limited to higher density urban commercial developments. The threshold will delay strategic sites coming forward and highlights the lack of evidence to support what could be a relatively onerous requirement to carry out feasibility studies.	The policy should be deleted.			
301/62	Bev	Hindle	Oxfordshire County Council	Main	58	Policy ESD 4 – Decentralised Energy Systems The requirement for developers of sites for over 100 dwellings and 1000m2 to prepare a feasibility assessment for DH/CHP reflects national policy and is supported.	Although not specifically stated in the policy, it is assumed this will include the potential for connection to the Ardley ERF for development generally in the Bicester / Ardley / Upper Heyford areas.			

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191/12	Michael	Robson	Cerda Planning Ltd / CALA Homes (Midlands) Ltd	Main	59		Explanation of this change is needed.			The threshold for the feasibility statement for DH/CHP has been significantly reduced from 400 dwellings to 100 dwellings with no explanation provided.
197/4	David	Keene	David Lock Associates / Gallagher Estates	Main	59	It is extremely unlikely that any proposal for 100 dwellings will be able to provide on site renewable energy above any provision required to meet building standards and or the nationally agreed standards being produced by the Government and nor is there any national expectation that they should do so. The lower threshold will delay and frustrate smaller sites and strategic sites alike from coming forward for development. The reduction in the threshold highlights the lack of evidence to support what could be a relatively onerous requirement to carry out feasibility studies. In the light of the proposed modification we consider that the policy should be deleted. There should be no general expectation of a feasibility assessment for all strategic developments.	Delete Policy			
206/11	Julia	Mountford	Boyer Planning / Redrow Homes and Wates Developments	Main	59		The criteria for the policy should use the heat mapping densities so that opportunities are not missed for decentralised energy, but additionally, where it is clear that it would be unviable to provide decentralised energy due to insufficient heat being produced from a development, then abortive work is not carried out.			There appears no update to the evidence base to support this alteration to the policy as the Background Paper on Policies ESD 1-5 previously referred specifically to 400 dwellings. There is no indication that the Local Plan Viability Update Executive Summary has revisited this aspect of the policy. There is no evidence to demonstrate that South East Bicester would meet the minimum threshold heat density to enable District Heating or Combined Heat and Power to be a viable option on this site. Developers can make a decision based on the market at the time when considering future Building Control requirements, in terms of energy efficiency and sustainability.
208/6	Alice	Kirkham	Persimmon Homes and Charles Church Midlands	Main	59	The modification will add significant delay and cost to proposals for new housing developments and is considered to be inconsistent with national policy which is seeking to bring forward a set of national standards which will provide consistency, rather than each individual local authority having their own set of local standards.	This requirement should be deleted from the Plan.			
268/3	Darren	Bell	David Lock Associates / Hallam Land Management	Main	59	It is extremely unlikely that any proposal of 100 dwellings will be able to provide on site renewable energy above any provision required to meet building regs or national standards nor is there any requirement to do so. The lower threshold will delay strategic sites coming forward for development and highlights the lack of evidence to support what could be a relatively onerous requirement to carry out feasibility studies.	There should be no general expectation of a feasibility assessment for all strategic developments and the policy should be deleted.			
301/63	Bev	Hindle	Oxfordshire County Council	Main	59	Policy ESD 5 – Renewable Energy This change reflects national policy.	The modification is supported.			
047/18	Matthew	Coyne	Banbury Town Council	Main	60					Concern that if housing is not developed in Oxford then there will be pressure for more housing delivery in Banbury, which would be unsustainable.
270/3	David	Jackson	Savills / University of Oxford	Main	60	The modifications do not address Oxford's unmet housing need. This approach is inconsistent with the NPPF para 83 and is inadequate given the scale and severity of the housing requirement. It will prolong the housing crisis and put deliverability of the Strategic Economic Plan at risk. A related concern is Green Belt review; the modifications indicate the Green Belt is to be reviewed now to meet local needs, then again to accommodate other development needs, contrary to the NPPF.	Oxford's unmet housing need should be addressed in emerging Local Plans at the earliest opportunity. Necessary joint working should be undertaken now rather than delay delivery and continue to exacerbate housing affordability issues and damage the local economy. Oxford's housing needs have been accommodated in the adjoining authorities in the past with the "country towns strategy" and was acknowledged in the sub-regional spatial strategy for Central Oxfordshire contained in the South East Plan and it would be a departure from past planning strategies for the county for an authority to proceed with its Local Plan without accommodating an element of the housing requirement arising from Oxford.			

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179/36	Matthew	Bates	Oxford City Council	Main	60	Disagree with the insertion of new paragraph B.224a, which states that the consideration of all reasonable options for accommodating Oxford's unmet housing need would include undertaking a HRA. This presumably assumes that the purpose of the joint work to assess spatial options is aimed at allocating specific sites, which is not the case. It will be a high-level assessment to determine broad spatial options, and it is not envisaged at this stage that all stages of HRA would need to be undertaken. Paragraph B.224a is therefore pre-empting a joint working process yet to be agreed, and is therefore ineffective in terms of cross-boundary working and the Duty to Cooperate.	Delete new paragraph B.244a.			
167/02	Colin	Cockshaw	Bicester Against Eco-Con (BAECon)	Main	61	It is considered that a review of the Green Belt is necessary now both to meet Oxford's needs and to meet part of the need assessed for Cherwell since it is argued that part of the allocation at Bicester would be better located closer to Oxford.	Substantially reduce residential allocations at Bicester pending early review of the Green Belt and new allocations closer to Oxford.			
166/35	Helen	Marshall	CPRE Oxfordshire	Main	61	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.				There are no special circumstances which can be demonstrated to justify small local reviews of the Green Belt, and that by introducing their possibility the Council will open itself to a welter of applications to develop within the Green Belt based on imagined "special circumstances" driven solely by a desire for commercial advantage. The planned industrial and residential developments at Oxford's Northern Gateway and at Bicester seem to provide more than adequate relief for any needs Kidlington may have in the Plan period. Added to this the proposal for Woodstock to expand by a 1,500 dwellings to be built on land south of Perdiswell Farm on the Shipton on Cherwell road (scoping application 14/00049/SCOP received just after the Local Plan modifications were issued, but not included in those modifications), suggests that any additional housing requirements in the vicinity of Kidlington are not going to be an issue.
178/7	Suzanne	Bangert	Terrance O'Rourke / Mr & Mrs Ashworth	Main	61		Add the following sentence to the end of proposed modification 61: " <u>Further small-scale review of the Green Belt boundary where it crosses through parts of villages will also be carried out to ensure compliance with the NPPF.</u> "			Opportunity to review the boundaries of the Green Belt, which has not been altered since it was established in 1975. Not only has. There is an identified need for additional housing in the district, including the rural areas. The retention of the existing boundary and absence of a local review means that the plan is not positively prepared. The Green Belt boundary at Merton fails to meet the requirements of paragraph 85 of the NPP. A review of the Green Belt boundaries would assist in ensuring housing required in Cherwell, and to meet the needs of Oxford City, which is particularly constrained by the existing boundaries is met.
201/3	Debbie	Dance	Oxfordshire Preservation Trust	Main	61	Objects to the Council's approach to development in the Oxford Green Belt. Acknowledge the SHMA and Duty to Cooperate however there is no agreement that the Oxford Green belt should be reviewed on a small or strategic scale in order to allow land within it to be released for development. Proposal for a small scale Green Belt review at Kidlington is not justifiable or acceptable. Suitable and brownfield sites should be continued to be use where possible.	Amend line 6 to read: "Initial findings from this work and the updated SHLAA suggest a small scale Green Belt review of the boundaries around the village may be required as part of Local Plan Part 2, to accommodate Kidlington's local housing need <u>but in line with government guidance this would only be carried out in 'exceptional circumstances'.</u> "			
207/4	Jacqueline	Mulliner	Terence O'Rourke Ltd / Blenheim Palace Estate	Main	61	No justification for an amended spatial distribution of homes and that the Plan, as drafted and modified, will not contribute to the aims and objectives of sustainable development if such a restrictive approach is applied to Kidlington. Oppose to the term small scale Green Belt review with reference to Kidlington. No objection to this process being undertaken through a Local Plan Part 2 process.	Change " small scale Green Belt review " to " <u>moderate-scale review of the Green Belt.</u> "			

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223/3	Patricia	Redpath	Kidlington Parish Council	Main	61					The Parish Council is concerned about the change in position regarding the sentence "further small scale local review of the green belt boundary around Kidlington will also be undertaken as part of Local plan part 2 if the villages local needs cannot be accommodated within the built up area" and continues to take the view that the Green Belt around Kidlington should be protected but is inclined to accept that the logic of the modification, given that an insufficient number of possible development sites have been identified within the village boundaries and subject to completion of a local housing needs assessment. However the Parish Council is seeking reassurance on how Kidlington's housing needs will be assessed and a decision reached on whether the local review of the Green Belt will be necessary. It also takes the view that while any Green Belt should only be concerned with Kidlington's housing needs, it should address all possible options for meeting them. Require confirmation that these issues will be addressed in a dialogue with the Council through the masterplan process.
229/16	Nik	Lyzba	JPPC / The Tripartite (Oxford University, Merton College and R.Smith)	Main	61		Anticipated development needs at BSP would require a 4 fold increase in the site area which would need to be reflected in the draft Plan.		The SA should have considered whether other spatial options, including changes to the green belt, would have provided a more appropriate alternative to meeting the local housing needs set out in the SHMA	The Council proposes a further limited review of the green belt boundaries around Kidlington in order to meet "local housing need". It accepts that such housing needs are able to constitute the "exceptional circumstances" required to justify alterations to existing green belt boundaries. Given this approach. Such a review should form part of this draft Plan in order to meet local housing needs. The need for the inclusion of a limited review of the green belt around Begbroke Science Park is supported. Currently, the University expects that its planned and anticipated development needs at BSP would require a 4 fold increase in the site area which would need to be reflected in the draft Plan.
262/1	Jason	Hill	Savills	Main	61					Site- Stratfield Farm Kidlington: The representor supports the soundness of the modifications relating to the distribution of housing across the rural villages and potential Green Belt review in Kidlington. They indicate that their client's land is available and capable of delivering a sustainable development in accordance with the criteria laid out in Modification 147 and in the SHLAA assessment of the site.
264/5	Andrew	Hornsby-Smith		Main	61			Supports these modifications which allow for the possibility that whilst the initial purpose of the local Green Belt review is for employment, a later review could encompass the remainder of the area of search once Kidlington's local housing need has been assessed further. This is highly likely to trigger the need for a local Green Belt review.		
270/4	David	Jackson	Savills / University of Oxford	Main	61	The modifications do not address Oxford's unmet housing need. This approach is inconsistent with the NPPF para 83 and is inadequate given the scale and severity of the housing requirement. It will prolong the housing crisis and put deliverability of the Strategic Economic Plan at risk. A related concern is Green Belt review; the modifications indicate the Green Belt is to be reviewed now to meet local needs, then again to accommodate other development needs, contrary to the NPPF.	Oxford's unmet housing need should be addressed in emerging Local Plans at the earliest opportunity. Necessary joint working should be undertaken now rather than delay delivery and continue to exacerbate housing affordability issues and damage the local economy. Oxford's housing needs have been accommodated in the adjoining authorities in the past with the "country towns strategy" and was acknowledged in the sub-regional spatial strategy for Central Oxfordshire contained in the South East Plan and it would be a departure from past planning strategies for the county for an authority to proceed with its Local Plan without accommodating an element of the housing requirement arising from Oxford.			

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179/37	Matthew	Bates	Oxford City Council	Main	61	Object that the Plan now provides a policy mechanism for reviewing the Green Belt around Kidlington to meet "local" housing need, relating to the increase in the rural housing allocation, whilst not recognising that this is also part of, and inseparable from, the wider needs of the HMA.	If the Plan were to progress, the City Council insists that references to 'local' Green Belt reviews are deleted and instead text introduced into Policy ESD14 and supporting text to set out a timetable for a strategic joint review of the Green Belt, should this be necessary (as expected) to meet both Cherwell's housing needs and those of the wider HMA (detailed suggestions provided)			
179/38	Matthew	Bates	Oxford City Council	Main	61	Para' B.253 There is nothing in national Green Belt policy about 'increased activity, traffic' as justification for Green Belt designation. Similarly no reference to 'restrain development pressures' per se.	Amend as follows: B.253 Part of the district falls within the Oxford Green Belt. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the most important attribute of Green Belts is their openness. The Oxford Green Belt was designated to restrain development pressures which could damage in part to protect the character of Oxford City and its heritage through increased activity, traffic and the outward sprawl of the urban area. Similarly, the character of Oxford in a rural setting cannot be maintained without the protection of the spatial relationship of Oxford with nearby settlements and the maintenance of the character of the intervening countryside.			
179/39	Matthew	Bates	Oxford City Council	Main	61	Para B.255 - This is historical context / evidence that is irrelevant to this Plan.	Delete para: B.255 Work undertaken for the revoked South East Plan did not identify a need for strategic review of the Green Belt boundaries in Cherwell District. The plan indicated that selective review should take place to the south of Oxford and stated that if the initial area of search to the south of Oxford did not prove a suitable candidate for review, a wider review across the area could take place. A legal challenge to this section of the South East Plan was issued on the grounds that proper environmental assessment of the proposals and reasonable alternatives had not taken place. The Treasury Solicitor conceded the legal challenge but the issue was not finally resolved before revocation of the plan.			
179/40	Matthew	Bates	Oxford City Council	Main	61	B.256: Needs to be updated to reflect potential outcome of the early Plan review.	Amend para B.256 as follows: B.256 Government policy indicates that Green Belt boundaries should only be altered in exceptional circumstances, <u>through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term. Cherwell District Council consider that</u> the Local Plan's housing requirements and development strategy as relate specifically to Cherwell can be achieved without the need for a strategic review of the Green Belt in the district in the short term. <u>However given the extent of unmet housing need identified in the Housing Market Area as a whole (and in particular in Oxford), and to provide a contingency strategy should other strategic growth locations not deliver housing at the rate hoped for, an assessment of the Green Belt will be undertaken jointly with the other Oxfordshire local authorities, potentially leading to a review of Green Belt boundaries which would be incorporate into an early review of the Cherwell Local Plan within 2 years (see Policy PSD2)...</u>			
179/40	Matthew	Bates	Oxford City Council	Main	61	B.256: Needs to be updated to reflect potential outcome of the early Plan review.	Cont...Initial findings from this work and the updated SHLAA suggest a small scale Green Belt review of the boundaries around the village may be required as part of Local Plan Part 2 a <u>strategic Green Belt review</u> , to accommodate Kidlington's local housing need <u>in addition to the wider housing needs of the Housing Market Area</u> ...A specific need has also been identified for the Science Park at Begbroke Therefore, exceptional circumstances are considered to exist to justify a small scale local review of the Green Belt...			

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179/41	Matthew	Bates	Oxford City Council	Main	61	B.257: It is premature and subjective to make reference to the 'vulnerable Kidlington Gap ahead of any joint formal Green Belt assessment.	Amend para B.257 as follows: B.257 It is essential that the impact on the Green Belt is minimised, therefore priority will be given to locations that lie adjacent to existing development, avoid the coalescence of settlements, protect the vulnerable Kidlington Gap and otherwise have the least impact possible on the Green Belt.			
301/7	Bev	Hindle	Oxfordshire County Council	Main	61					Modifications 61 and 62 refer to a possible local review of the Green Belt at Kidlington to meet future local housing needs as part of the Local Plan Part 2 process. This modification is supported as further housing here will support potential employment development in the Oxford airport/Begbroke area and will also be close to new employment development proposed in Oxford at Northern Gateway. If a comprehensive strategic review of the green belt is undertaken through joint working, it could encompass this need.
301/64	Bev	Hindle	Oxfordshire County Council	Main	61	Policy ESD 14 – Oxford Green Belt These modifications refer to a possible local review of the Green Belt at Kidlington to meet future local housing needs as part of the Local Plan Part 2 process.	These modifications are supported. Further housing here will support potential employment development in the Oxford airport/Begbroke area and will also be close to new employment development proposed in Oxford at Northern Gateway. A comprehensive strategic review of the green belt could encompass this need.			
111	Bilham	Woods		Main	62					Modifications to the Green Belt is necessary but any development should be in the area bounded by Langford Lane to the north, the A44 to the west and Sandy Lane to the east. There are already inroads of development in the area; good transport links available; employment is available; it is not open country; and developing in this location would be much more sensible than the West Oxfordshire District Council proposal to build many houses on virgin land to the east of Woodstock.
115	S.R. and A	Nix		Main	62		Modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			Objection raised to the proposal for a possible local review of the Green Belt boundary around Kidlington. The Green Belt around Kidlington has helped to keep the village separate from Oxford, maintaining its village atmosphere. Cannot see how any new housing built on Green Belt land would meet an unspecified local need. It seems to be simply a move to meet the Oxon Strategic Housing Market Assessment's vastly inflated requirements. The Green Belt is a permanent designation and that Government guidance states that unmet housing need is not a reason for building in the Green Belt. If Stratfield Farm was built on, the consequences alone for local traffic would be horrendous. It is already a nightmare trying to commute from the Garden City area, accessing the Kidlington roundabout to travel south into Oxford or to access the A34 via Frieze Way on weekday mornings. The existing roads will not cope with the potential hundred more cars every day from hundreds of new residents.

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118	Qi Luo			Main	62		Modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			Objection raised to the proposal for a possible local review of the Green Belt boundary around Kidlington. It is bad planning to allow Kidlington to become a North Oxford suburb rather than a separate village which will happen quite quickly once the Green Belt is compromised. Kidlington has a great network of footpaths through the Green Belt areas and they are used by local people and those coming from North Oxford. Changing the size of the Green Belt around Kidlington will destroy the entire community and the environment in a surprisingly short time. This modification is not being considered to meet 'local need for housing, in fact it is much likely that such a move of freeing up Green Belt land for housing will be exploited and turn Kidlington into a rudderless suburb of Oxford for one purpose and that it is to meet the greater SHMA plan. Green Belt designation was created for a reason and housing need should exhaust all other options before encroaching on Green Belt.
143	Clare and Michael	Harris		Main	62		Modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			Objection raised to the proposal for a possible local review of the Green Belt boundary around Kidlington. The Green Belt around Kidlington has helped to keep the village separate from Oxford over many years, allowing it to remain mainly pleasant and unspoilt countryside with many well used public footpaths and areas of beauty to explore and relax in. It is much appreciated and enjoyed by large number of local residents. Cannot see how any new housing built on Green Belt land can be limited to meeting 'local need' as the Plan suggests. Such housing will simply be used to meet the vastly inflated housing requirement as assessed by the SHMA. The number of houses in Cherwell will be increased by 40% in just 17 years with even more to be added as 'overspill' from Oxford. The road networks and public services will struggle to cope with the levels of population increase envisaged. The SHMA has been extensively criticised by individuals, organisations, experts, local politicians and MPs. The Green Belt is a permanent designation and that Government guidance states that unmet housing need is not a reason for building in the Green Belt.
145	Roger and Christine	Howes		Main	62		Modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			Objection raised to the proposal for a possible local review of the Green Belt boundary around Kidlington. The pleasant countryside is worth protecting for generations to come so they can enjoy it too. The local need of the people in Kidlington is worth thinking about, but any forced excess housing will cause problems with schools, surgeries (already at a stretch) and traffic congestion which is a problem driving into Oxford and on the A34. Land to the rear of Webbs Way constantly floods in the winter and believe major consideration should be given to this. The Green Belt is a permanent designation and that Government guidance states that unmet housing need is not a reason for building in the Green Belt.

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149	Mary	Hurst		Main	62		Modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			Objection raised to the proposal for a possible local review of the Green Belt boundary around Kidlington. The Green Belt around Kidlington has helped to keep the village separate from Oxford over many years. It is mainly pleasant and unspoilt countryside with many well-used footpaths and 'green spaces'. It is much appreciated and enjoyed by large numbers of local residents. Cannot see how any new housing built on Green Belt land can be limited to meeting 'local need' as the Plan suggests. It seems more likely that such housing will simply be used to meet the vastly inflated housing requirement as assessed by the SHMA. The Green Belt is a permanent designation and that Government guidance states that unmet housing need is not a reason for building in the Green Belt.
022/3	Gary and Louise	Crone		Main	62		Modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.		No comment	Objection raised on the proposed wording and all other related modifications. The Green Belt is a permanent designation and that Government guidance states that unmet housing need is not a reason for building in the Green Belt. Removing land from the Green Belt to meet housing needs cannot be accommodated within the built up area. The Kidlington Masterplan is given as evidence for this change in policy, however, this is an unpublished document which has had no public consultation. Cannot see how any new housing built on Green Belt land can be limited to meeting local need. It is more likely that such housing will simply be used to meet the vastly inflated housing requirements as assessed by the SHMA. The Green Belt around Kidlington is one of the village's greatest assets.
024/3	Catherine	Grebenik		Main	62		Modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.		No comment	Objection raised on the proposed wording and all other related modifications. The Green Belt is a permanent designation and that Government guidance states that unmet housing need is not a reason for building in the Green Belt. Removing land from the Green Belt to meet supposed housing need is therefore contrary to national policy. The Kidlington Masterplan is given as evidence for this change in policy, however, this is an unpublished document which has had no public consultation. Cannot see how any new housing built on Green Belt land can be limited to meeting local need. It is more likely that such housing will simply be used to meet the vastly inflated housing requirements as assessed by the SHMA. The Green Belt around Kidlington is one of the village's greatest assets. It provides important drainage for rainfall and soaks up a considerable amount of water that would otherwise be liable to exacerbate the flood problem around Oxford. As such the meadows provide vital flood defence.
025/3	Steven	Daggitt		Main	62		Modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.		No comment	Objection raised on the proposed wording and all other related modifications. The Green Belt is a permanent designation and that Government guidance states that unmet housing need is not a reason for building in the Green Belt. Removing land from the Green Belt to meet supposed housing need is therefore contrary to national policy. The Kidlington Masterplan is given as evidence for this change in policy, however, this is an unpublished document which has had no public consultation. Cannot see how any new housing built on Green Belt land can be limited to meeting local need. It is more likely that such housing will simply be used to meet the vastly inflated housing requirements as assessed by the SHMA. The Green Belt around Kidlington is one of the village's greatest assets.

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030/3	Jonathan	Cole		Main	62		Modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			Objection raised on the proposed wording and all other related modifications. The Green Belt is a permanent designation and that Government guidance states that unmet housing need is not a reason for building in the Green Belt. Removing land from the Green Belt to meet supposed housing need is therefore contrary to national policy. The Kidlington Masterplan is given as evidence for this change in policy, however, this is an unpublished document which has had no public consultation. Cannot see how any new housing built on Green Belt land can be limited to meeting local need. It is more likely that such housing will simply be used to meet the vastly inflated housing requirements as assessed by the SHMA. The Green Belt around Kidlington is one of the village's greatest assets.
033/3	Ora	Sapir		Main	62		Modification should be deleted			Objection raised on the proposed wording and all other related modifications. The Green Belt is a permanent designation and that Government guidance states that unmet housing need is not a reason for building in the Green Belt. Removing land from the Green Belt to meet housing needs cannot be accommodated within the built up area. The Kidlington Masterplan is given as evidence for this change in policy, however, this is an unpublished document which has had no public consultation. Cannot see how any new housing built on Green Belt land can be limited to meeting local need. It is more likely that such housing will simply be used to meet the vastly inflated housing requirements as assessed by the SHMA. The Green Belt around Kidlington is one of the village's greatest assets.
035/3	Luthfer	Rahman		Main	62		Modification should be deleted			Objection raised on the proposed wording and all other related modifications. The Green Belt is a permanent designation and that Government guidance states that unmet housing need is not a reason for building in the Green Belt. Removing land from the Green Belt to meet housing needs cannot be accommodated within the built up area. The Kidlington Masterplan is given as evidence for this change in policy, however, this is an unpublished document which has had no public consultation. Cannot see how any new housing built on Green Belt land can be limited to meeting local need. It is more likely that such housing will simply be used to meet the vastly inflated housing requirements as assessed by the SHMA. The Green Belt around Kidlington is one of the village's greatest assets. Request for the proposed wording change to be deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.
036/3	Rachel	Rahman		Main	62		Modification should be deleted			Objection raised on the proposed wording and all other related modifications. The Green Belt is a permanent designation and that Government guidance states that unmet housing need is not a reason for building in the Green Belt. Removing land from the Green Belt to meet housing needs cannot be accommodated within the built up area. The Kidlington Masterplan is given as evidence for this change in policy, however, this is an unpublished document which has had no public consultation. Cannot see how any new housing built on Green Belt land can be limited to meeting local need. It is more likely that such housing will simply be used to meet the vastly inflated housing requirements as assessed by the SHMA. The Green Belt around Kidlington is one of the village's greatest assets. Request for the proposed wording change to be deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.

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038/1	Philip	Kavanagh		Main	62		Housing numbers in the original draft local plan are reinstated.			Objects to housing need assessed in the 2014 SHMA and "overspill" from Oxford. Level of growth unrealistic and unbelievable. I cannot see how the road network or public services will be able to cope with the population increase envisaged. There is enough traffic on our roads already. The green belt is important to the residents, and should remain intact.
039/1	Gordon	Tasker		main	62					The green belt around Kidlington has provided the residents with the opportunity to walk the many footpaths which exist and enjoy the open countryside. The traffic situation in Kidlington is already a problem and to have further development would make the present congestion problems worse. Additional development would cause a major disruption.
040/1	Christopher	Rogers		Main	62					Concerned about threat of reducing the greenbelt around Kidlington and building houses at Gosford farm, Stratfield farm, behind The Moors and Webbs way, it would be reducing the wildlife in the area.
041/1	Heather	Nicholls		Main	62		Request that modification is deleted and that Stratfield Farm remains a Farm			Objects to development of the green belt area of Stratfield Farm. The wildlife and animals that live there would suffer. It floods terribly in the winter.
042/2	Chris	Stevens		Main	62		Modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			Object to the proposal for a possible local review of the Green Belt boundary around Kidlington. The Green Belt around Kidlington has helped to keep the village separate from oxford over many years. It is mainly pleasant and unspoilt countryside with many well-used footpaths and 'green spaces'. I also understand that Green Belt is a permanent designation and that Government guidance states that unmet housing need is a reason for building in the Green Belt.
043/2	Wendy	Castle		Main	62		Modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			Objecting to development in the Green Belt behind the Moors and Webbs Way – increase the existing traffic problems and put severe pressure on local amenities such as roads, schools and medical facilities. To loose such an important local amenity just to appease a perceived housing quota in the SHMA, would be unforgiveable.
044/2	Bridget Richard	Atkins Clarke		Main	62					We object to the proposal for a possible local review of the Green Belt boundary around Kidlington. The Green Belt around Kidlington is crucial for all these roles. It has helped to keep the village separate from Oxford for many years. It consists of unspoilt countryside with many open spaces. There are large amounts of wildlife including various types of deer, badgers, birds as well as horses. There is also a significant risk that this proposed local review may be an excuse to meet the unrealistic housing requirements of the SMHA. The Green Belt is a permanent designation and Government guidance states that unmet housing need is NOT a reason for building in the Green Belt.
045/1	Zoe	Chritodoulo u		Main	62					Object to modification 62 of the Cherwell local plan for the following reason: The green belt in south east England was originally conceived to prevent the over –development of the area. With respect to Kidlington, this original concept still applies. Without the Green belt, Kidlington will eventually become another suburb of Oxford and loose it's identity.

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046/1	G	Tosti		Main	62		Modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			Object to the proposal for a possible local review of the green belt boundary around Kidlington and specifically the fields behind the Moors and Webbs Way. It is the governments aggressive policy to build potentially 3 million new homes by 2020 and not the criteria of meeting "local needs" as the plan suggests that is forcing the issue by the SHMA. These government policies have helped to keep the village separate from Oxford over many years and keep the countryside unspoilt with many active footpaths and 'green spaces', these areas are enjoyed by many local residents. The Green Belt is a permanent designation and that Government guidance states that 'unmet housing need is not a reason for building in the green belt. An equally important issue is flooding - the Moors area and Webb's Way area has a history of flooding.
048/2	J and L	Pilgrim		Main	62		Modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			Objection to proposed changes to Policy ESD14 related modifications. The Green Belt is a permanent designation and that Government guidance states that unmet housing need is not a reason for building in the Green Belt. Removing land from the Green Belt to meet housing needs cannot be accommodated within the built up area. The Kidlington Masterplan is given as evidence for this change in policy, however, this is an unpublished document which has had no public consultation. Cannot see how any new housing built on Green Belt land can be limited to meeting local need. It is more likely that such housing will simply be used to meet the vastly inflated housing requirements as assessed by the SHMA. The Green Belt around Kidlington is one of the village's greatest assets. Request for the proposed wording change to be deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.
054/2	Mr and Mrs J	Blunsden		Main	62		Modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			Object to the proposal for a possible local review of the Green Belt boundary around Kidlington. The Green Belt around Kidlington has helped to keep the village separate from Oxford over many years. It is mainly pleasant and unspoilt countryside with many well-used footpaths and 'green spaces'. I also understand that Green Belt is a permanent designation and that Government guidance states that unmet housing need is a reason for building in the Green Belt.
056/1	K	Selway		Main	62		Modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			Object to the proposal for a possible local review of the Green Belt boundary around Kidlington. The Green Belt around Kidlington has helped to keep the village separate from Oxford over many years. It is mainly pleasant and unspoilt countryside with many well-used footpaths and 'green spaces'. I also understand that Green Belt is a permanent designation and that Government guidance states that unmet housing need is a reason for building in the Green Belt.
057/1	Hazel	George		Main	62		Request that modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			Green Belt should continue to keep Kidlington separate from Oxford and prevent a continuous urban sprawl. The Green Belt areas are appreciated and enjoyed by many residents with many well-used footpaths. Increased amount of building in these areas would not be justified for local needs and would probably be used to comply with the inflated housing numbers required in the SHMA. In addition, roads through Kidlington are already very congested, and I think our schools are mostly full, so how is it proposed to accommodate a large increase in the number of residents.

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058/1	Stella and Louis	Rajandream		Main	62		Request that modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			Object to the proposal for a possible local review of the Green Belt boundary around Kidlington. The Green Belt around Kidlington has helped to keep the village separate from Oxford over many years. It is mainly pleasant and unspoilt countryside with many well-used footpaths and 'green spaces'. It is appreciated and enjoyed by large numbers of local residents. Cannot see how any new housing built on Green Belt land can be limited to meeting 'local need' as the Plan suggests. It seems more likely that such housing will simply be used to meet the vastly inflated housing requirement as assessed by the SHMA. Understand that Green Belt is a permanent designation and that Government guidance states that unmet housing need is a reason for building in the Green Belt. Concerned about the proposal to develop housing alongside Webbs Way as this will of necessity increase even further traffic flow along Mill Street, which is extremely narrow and is already hazardous when trying to get out of the drive. Increase of cars and buses in the area.
060/2	Louis	Borucki		Main	62		Modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			Object to the proposal for a possible local review of the Green Belt boundary around Kidlington. The Green Belt around Kidlington has helped to keep the village separate from Oxford over many years. It is mainly pleasant and unspoilt countryside with many well-used footpaths and 'green spaces'. I also understand that Green Belt is a permanent designation and that Government guidance states that unmet housing need is a reason for building in the Green Belt.
080/1	Anne	Hine		Main	62		Delete Mod 62			Objects to GB Review(1) physical separation still required between Oxford and Kidlington (2) important for biodiversity (3) acts as floodplain.
082/2	Michael	Hurst		Main	62		Delete Mod 62 Possible Oxford Green Belt Review as part of Local Plan Part 2 as "...Government guidance states that unmet housing need is not a reason for building in the Green Belt "			
083/2	M. J.	Moore		Main	62	GB still required as a means of maintaining gap between two settlements; multifunctional space eg used for recreation/GI; contrary to Government guidance	Delete Mod 62 and all references to a Green Belt Review around Kidlington to meet local housing need.			
084/2	J	Huck		Main	62		Delete Mod 62 and all references to a Green Belt Review around Kidlington to meet local housing need.			
085/2	J	Huck		Main	62		Delete Mod 62 and all references to a Green Belt Review around Kidlington to meet local housing need.			
088/2	Henning	Sthamer		Main	62					Objects to possible GB Review: (1) important to maintain the strategic gap Oxford and Kidlington; (2) the intrinsic value of the countryside should not be underestimated ;(3) GB also contributes to recreation and well-being; (4) home to wildlife ;(5) lower parts acts as flood plain (6) contrary to Government guidance relating to unmet need does not justify building in the Green Belt (7) SHMA unsound housing need vastly inflated.
092/2	Philip	Blackman		Main	62	Green Belt is important to maintain separation between Kidlington and Oxford. The local countryside, unspoilt with many footpaths and green spaces, is enjoyed and appreciated by many local residents. Do not see how housing can be limited to 'local needs' as the plan suggests.	Delete Mod 62			
093/1	Angela	Kelly		Main	62	Kidlington is overcrowded with the amount of new development in recent years and consent given in the Moors. This has increased journey times to and from the village. Building more homes will make it near impossible to get out of the village. Two years ago it took 20 minutes to drive from Kidlington to Summertown in the early morning. This journey now takes 45-60 minutes.	Delete Mod 62			

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094/2	A R	Tuner		Main	62	Green Belt is important to maintain separation between Kidlington and Oxford. The local countryside, unspoilt with many footpaths and green spaces, is enjoyed and appreciated by many local residents. Do not see how housing can be limited to 'local needs' as the plan suggests.	Delete Mod 62			
095/2	W	Keppie		Main	62	Green Belt is important to maintain separation between Kidlington and Oxford. The local countryside, unspoilt with many footpaths and green spaces, is enjoyed and appreciated by many local residents. Do not see how housing can be limited to 'local needs' as the plan suggests. Green Belt is a permanent designation. Government guidance states housing need is not a reason for building in the Green Belt.	Delete Mod 62			
099/1	John and Laura	Wainwright		Main	62	Strongly object to the proposed Green Belt boundary review around Kidlington. Kidlington voted several years ago to maintain 'village' status' which the surrounding Green Belt serves a crucial purpose in helping to preserve. Government guidelines indicate unmet housing need is not a valid reason for allowing development on Green Belt land. Loss of Green Belt would cause environmental damage to large areas of pleasant, unspoilt countryside enjoyed by walkers and wildlife enthusiasts. Some of this land is of high scenic value and important for wildlife, including rare species. Habitats would be severely damaged or destroyed. Some of the Green Belt land around Kidlington suffers serious drainage problems and flooding. Development would lead to a huge increase in traffic and demand on public services. Kidlington would no longer be a village. Do not see how housing can be limited to 'local needs' as the plan suggests.	Delete Mod 62			
100/2	Nicholas	Mullineux		Main	62					Objects to the proposal for a possible local review of the Green Belt boundary around Kidlington. The Green Belt around Kidlington has helped to keep the village separate from Oxford for many years. It is mainly pleasant and unspoilt countryside with many well used footpaths and green spaces. It is much appreciated and enjoyed by large numbers of local residents. Cannot see how any new house building on Green Belt land can be limited to meet 'local need' as the plan suggests. It seems more likely that such housing will simply be used to meet the vastly inflated housing requirement as assessed by the SHMA. The Green Belt is a permanent designation and that Government guidance states that unmet housing need is not a reason for building in the Green Belt.
104/2	Alan and Jane	Womack		Main	62		Modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			Object to the proposal for a possible local review of the Green Belt boundary around Kidlington. The Green Belt around Kidlington has helped to keep the village separate from Oxford over many years. It is mainly pleasant and unspoilt countryside with many well-used footpaths and 'green spaces'. It is much appreciated and enjoyed by large numbers of local residents. Cannot see how any new housing built on Green Belt land can be limited to meeting 'local need' as the plan suggests. It seems more likely that such housing will simply be used to meet the vastly inflated housing requirements as assessed by the SHMA. Understand that Green Belt is a permanent designation and that Government guidance states that unmet housing need is a reason for building in the Green Belt.

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108/3	R	Phipps		Main	62		Modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			Objection raised to the proposal for a possible local review of the Green Belt boundary around Kidlington. The Green Belt around Kidlington has helped to keep the village separate from Oxford over many years. It is mainly pleasant and unspoilt countryside with many well-used footpaths and 'green spaces'. It is much appreciated and enjoyed by large numbers of local residents. Cannot see how any new housing built on Green Belt land can be limited to meeting 'local need' as the Plan suggests. It seems more likely that such housing will simply be used to meet the vastly inflated housing requirement as assessed by the SHMA. The Green Belt is a permanent designation and that Government guidance states that unmet housing need is not a reason for building in the Green Belt.
110/3	Martin and Pamela	Palmer		Main	62		Modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			Objection raised to the proposal for a possible local review of the Green Belt boundary around Kidlington. The Green Belt around Kidlington has helped to keep the village separate from Oxford over many years. It is mainly pleasant and unspoilt countryside with many well-used footpaths and 'green spaces'. It is much appreciated and enjoyed by large numbers of local residents. Cannot see how any new housing built on Green Belt land can be limited to meeting 'local need' as the Plan suggests. It seems more likely that such housing will simply be used to meet the vastly inflated housing requirement as assessed by the SHMA. The Green Belt is a permanent designation and that Government guidance states that unmet housing need is not a reason for building in the Green Belt.
112/2	David	Payne		Main	62		Modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			Objection raised to the proposal for a possible local review of the Green Belt boundary around Kidlington. The Green Belt around Kidlington has helped to keep the village separate from Oxford over many years. It is mainly pleasant and unspoilt countryside with many well-used footpaths and 'green spaces'. It is much appreciated and enjoyed by large numbers of local residents. Cannot see how any new housing built on Green Belt land can be limited to meeting 'local need' as the Plan suggests. It seems more likely that such housing will simply be used to meet the vastly inflated housing requirement as assessed by the SHMA. The Green Belt is a permanent designation and that Government guidance states that unmet housing need is not a reason for building in the Green Belt.
121/2	Roger	Prince		Main	62		Modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			Objection raised to the proposal for a possible local review of the Green Belt boundary around Kidlington. The Green Belt around Kidlington a mainly pleasant village surrounded by unspoilt countryside. There are many public footpaths in the area which enable a substantial number of local residents to appreciate and enjoy the 'green spaces'. It is impossible to see how any new housing built on Green Belt land can be limited to meeting 'local need' as the Plan suggests. What is mostly likely to happen is that such housing will just be used to meet the vastly inflated housing requirement as assessed by the unreliable estimates in the SHMA. The Green Belt was put in place all those years ago for very good reasons. Urban sprawl should be resisted and any local review of the Green Belt would almost certainly be the thin end of a very long wedge. The Green Belt is a permanent designation and that Government guidance states that unmet housing need is not a reason for building in the Green Belt.

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124/2	Margaret	Harris		Main	62		Modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			Objection raised to the proposal for a possible local review of the Green Belt boundary around Kidlington. The Green Belt around Kidlington has helped to keep the village separate from Oxford over many years. It is mainly pleasant and unspoilt countryside with many well-used and ancient footpaths and it has been farmed for hundred of years. The outline of ancient field boundaries are much in evidence. This open space is much appreciated and enjoyed by large numbers of local residents as well as visitors from the surrounding area who make use of the extensive network of footpaths. The Green Belt is a permanent designation and that Government guidance states that unmet housing need is not a reason for building in the Green Belt.
126/3	Nicky and Patrick	Forsythe		Main	62		Modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			Objection raised to the proposal for a possible local review of the Green Belt boundary around Kidlington. The Green Belt is a permanent designation and that Government guidance states that unmet housing need is not a reason for building in the Green Belt. The Kidlington Masterplan is given as evidence for the change in policy however this is an unpublished document which has had no public consultation. Cannot see how any new housing built on Green Belt land can be limited to meeting 'local need'. It seems more likely that such housing will simply be used to meet the vastly inflated housing requirement as assessed by the SHMA. The Green Belt around Kidlington is one of the village's greatest assets. It is generally 'open' and unspoilt. It includes many footpaths and 'green spaces' and is much enjoyed by large numbers of local residents.
128/3	Albert and Ann	Prior		Main	62		Modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			Objection raised to the proposal for a possible local review of the Green Belt boundary around Kidlington. This could affect the area around The Moors and Webbs Way. The Green Belt is a permanent designation and that Government guidance states that unmet housing need is not a reason for building in the Green Belt. Removing land from the Green Belt to meet housing need does go against national policy. The Green Belt around Kidlington is much appreciated and many residents can be seen daily enjoying its benefits. It's unspoilt, has a variety of wildlife, many footpaths and green spaces. Understand that more houses are needed but it would be very unfortunate if part of the Green Belt were to be used for this purpose.
129/2	Linda	Ward		Main	62		Modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			Objection raised to the proposal for a possible local review of the Green Belt boundary around Kidlington. The Green Belt around Kidlington has helped to keep the village separate from Oxford and the surrounding villages. It is mainly pleasant and unspoilt countryside with many well-used footpaths and 'green spaces'. It is much appreciated and enjoyed by large number of local residents. Cannot see how any new housing built on Green Belt land can be limited to meeting 'local need' as the Plan suggests. Such housing will simply be used to meet the vastly inflated housing requirement as assessed by the SHMA. The Green Belt is a permanent designation and that Government guidance states that unmet housing need is not a reason for building in the Green Belt. The Plan states that it is possible to meet the even the present grossly inflated SHMA driven target without encroaching on Green Belt hence a strategic review is unnecessary.
131/1	Ian	Reckless		Main	62	It is difficult to see how housing on Green Belt land can be limited to local needs; it is more likely to be used to meet vastly inflated SHMA housing requirements. The Green Belt maintains a distinction between Kidlington and Oxford and provides a vital amenity for residents, and home for wildlife.	Deletion of modification 62 together with all references to a Green Belt Review around Kidlington to meet local housing needs.			

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133/3	Roger	Davies		Main	62	Government guidance states that unmet housing need is not a reason for building in the Green Belt. The Kidlington Masterplan is unpublished, and has not been subject to public consultation or scrutiny.	Modification 62 should be deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			
135/2	Jane	Rendle		Main	62	Government guidance states that unmet housing need is not a reason for building in the Green Belt. There is no quantification of local need.	Modification 62 should be deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			The Green Belt plays an essential role in separating Kidlington and Oxford, and is important as an amenity and environmentally. It is difficult to see how new housing on Green Belt land can be limited to meeting local need and seems more likely that it will be used to met SHMA housing requirements.
136/2	Sheila	Churchill		Main	62					Objection is made to modification 62. Protection needs to be maintained to protect the community from inappropriate development around Kidlington. Local conservation areas should not be broached, parks and paths should not be lost, and local roads are inadequate for additional large volumes of traffic. It is understood that the Green Belt should not be used for additional housing.
139/2	John	Batchelor		Main	62		Modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			The Green Belt policy has ensured protection for villages throughout the south of England since it was initiated. From Church Street and beyond St Mary's Church there is an important space for wildlife and the amenity provided by the footpaths and green spaces is invaluable, and is greatly valued by everyone who lies in the village. If the proposed small scale local review of the Green Belt boundary around Kidlington is accepted it would in practice be a disastrous precedent. Building on Green Belt land cannot be limited to meeting 'local need'. Further building in Kidlington would destroy the character of Kidlington and cease to be a village. The land behind The Moors and Webbs Way is particular valuable as Green Belt amenity land. Development in the area would increase the increase of flooding.
140/1	Todd	Huffman		Main	62					Agree that Kidlington needs to grow but would like the Council to pay particular attention to the following issues: 1) All new housing or commercial property development ought to accommodate parking spaces that are realistic to the expected traffic. Developer should pay for this and not the taxpayer or Council. 2) If green space is sacrificed, access needs to be carefully considered. Existing roads and commercial interests needs consideration. 3) The creation or designation of additional recreational lands needs to be considered. e.g. generous areas along the canal or areas in existing green fields needs to be designated as recreational park land.
146/2	Susan	Rivers		Main	62					Objection raised on the forecasts of housing need from the 2014 SHMA. The land is concerned is enjoyed by residents and the countryside should be preserved at all costs for future generations. Understand Green Belt was a permanent designation. Concerned by the impact more traffic would have on The Moors where more houses are already being built.

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147/2	Anthony	McMullan		Main	62		Modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			Objection raised to the proposal for a possible local review of the Green Belt boundary around Kidlington. The Green Belt around Kidlington has helped to keep the village separate from Oxford over many years. It is mainly pleasant and unspoilt countryside with many well-used footpaths and 'green spaces'. It is much appreciated and enjoyed by large numbers of local residents. Cannot see how any new housing built on Green Belt land can be limited to meeting 'local need' as the Plan suggests. It seems more likely that such housing will simply be used to meet the vastly inflated housing requirement as assessed by the SHMA. The Green Belt is a permanent designation and that Government guidance states that unmet housing need is not a reason for building in the Green Belt.
148/2	Mr and Mrs A.	Biskup		Main	62		Modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			Objection raised to the proposal for a possible local review of the Green Belt boundary around Kidlington. The Green Belt around Kidlington has helped to keep the village separate from Oxford over many years. It is mainly pleasant and unspoilt countryside with many well-used footpaths and 'green spaces'. It is much appreciated and enjoyed by large numbers of local residents. Cannot see how any new housing built on Green Belt land can be limited to meeting 'local need' as the Plan suggests. It seems more likely that such housing will simply be used to meet the vastly inflated housing requirement as assessed by the SHMA. The Green Belt is a permanent designation and that Government guidance states that unmet housing need is not a reason for building in the Green Belt.
150/3	Fiona	Thomas		Main	62	Modification needs to be deleted alongside all references to a green belt review around Kidlington to meet local housing need. Kidlington is a large village and the green belt is essential to prevent it from being engulfed. The Green Belt is well used by the local community who place a high value on it.	Modification needs to be deleted alongside all references to a green belt review around Kidlington to meet local housing need.			
153/3	Jan	Molyneux	Stephen Bowley Planning Consultancy / U Stay Ltd	Main	62	The review of the Green Belt around Kidlington should be undertaken as soon as possible and should encompass the settlements within the immediate area. Such a review should identify significant sites within these settlements.	Undertaken the Green Belt review as an urgent process within the preparation of the Local Plan.			
166/36	Helen	Marshall	CPRE Oxfordshire	Main	62	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.				There are no special circumstances which can be demonstrated to justify small local reviews of the Green Belt, and that by introducing their possibility the Council will open itself to a welter of applications to develop within the Green Belt based on imagined "special circumstances" driven solely by a desire for commercial advantage. The planned industrial and residential developments at Oxford's Northern Gateway and at Bicester seem to provide more than adequate relief for any needs Kidlington may have in the Plan period. Added to this the proposal for Woodstock to expand by a 1,500 dwellings to be built on land south of Perdiswell Farm on the Shipton on Cherwell road (scoping application 14/00049/SCOP - received just after the Local Plan modifications were issued, but not included in those modifications), suggests that any additional housing requirements in the vicinity of Kidlington are not going to be an issue.

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168/1	David	Orman		Main	62		Request that Modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local need			Destroying more of the countryside around Kidlington merely to satisfy the overinflated housing requirement, assessed by the SHMA, is meeting "local need". Any removal of Green belt boundaries around Kidlington will be the start of the loss if identity of all villages, merging us in to one big concrete "town". Concerned about the irreversible impact that these proposals will have on the countryside, wildlife & the environment, or how the area would be able to support this increase in population. I understand that the green belt is a permanent designation & that the Government guidance states that the unmet housing need is not a reason for building on the green belt.
169/2	Anthony	Churchill		Main	62		Modification 62 is deleted altogether and all references to a Green Belt Review around Kidlington to meet local housing need removed from the plan			The green belt has prevented Kidlington becoming a suburb of Oxford. The Government guidance states that unmet housing need is not a reason for building in the Green Belt.
170/2	Susan	Dunn		Main	62		Modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			Object to the proposal for a possible local review of the Green Belt boundary around Kidlington. The Green Belt around Kidlington has helped to keep the village separate from Oxford over many years. It is mainly pleasant and unspoilt countryside with many well-used footpaths and 'green spaces'. I also understand that Green Belt is a permanent designation and that Government guidance states that unmet housing need is a reason for building in the Green Belt.
172/1	John & Melanie	Wakefield		Main	62		Request that modification 62 is deleted with all references to a green belt review around Kidlington to meet local housing need.			The green belt around Kidlington is well used by local residents having many footpaths and green spaces much appreciated by many. It also acts to keep the village separate from Oxford.
173/2	Mr & Mrs M	Prosser		Main	62		The plan unsound and think that modification 62 should be deleted along with all mention of a green belt review around Kidlington to meet the local housing needs.			Object to the proposal for a possible local review of the green belt boundary around Kidlington. It is a heaven for our wildlife. Once it is taken for whatever reason you can never get that space back. The green space has been part of our village for all to appreciate. We cannot see how it would meet local needs for housing.
176/1	Steve & Elaine	Taberner		Main	62					The Green Belt around Kidlington has helped to keep the village separate from Oxford over many years. It is mainly pleasant and unspoilt countryside with many well-used footpaths and 'green spaces'. Cannot see how any new housing built on Green Belt Land can be limited to meeting "local need" as the plan suggests. It seems more likely that such housing will simply be used to meet the vastly inflated housing requirement as assessed by the SHMA. I also understand that Green Belt is a permanent designation and that Government guidance states that unmet housing need is not a reason for building in the Green Belt.
177/1	Mark & Elaine R	Rushby		Main	62		Consider the plan to be unsound and request that modification 62 is deleted, together with all references to a Green Belt Review around Kidlington to meet local housing need.			The Green Belt around Kidlington has helped to keep it separate from Oxford over many years. If building new housing on the Green Belt goes ahead, especially to the south of Kidlington, you would see it go from being a village to a town and then just another suburb of Oxford. The Green Belt around Kidlington is mainly unspoilt and pleasant countryside with wildlife. We cannot see how any new housing built on Green Belt land can be limited to meeting 'local need' as the plan suggests. It seems more likely that such housing will simply be used to meet the vastly inflated housing need as assessed by the SHMA. We also understand that Green Belt is a permanent designation and that Government guidance states that unmet housing need is not a reason for building in the Green Belt.

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180/2	Sally	Atkins		Main	62					Object to the proposal for a possible local review of the Green Belt boundary around Kidlington. The Green Belt around Kidlington has helped to keep the village separate from Oxford over many years. It is mainly pleasant and unspoilt countryside with many well-used footpaths and 'green spaces'. I also understand that Green Belt is a permanent designation and that Government guidance states that unmet housing need is a reason for building in the Green Belt.
181/3	Lyn	Richards		Main	62		Modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			Objection raised to the proposal for a possible local review of the Green Belt boundary around Kidlington. The Green Belt around Kidlington is one of the village's greatest assets. It is generally 'open' and unspoilt. It includes many footpaths and 'green spaces' and is much enjoyed by large numbers of local residents.
182/2	Mark and Natalie	Wallace		Main	62		There has not been local housing needs assessment undertaken recently to properly assess the quantity of new houses required. This needs to be undertaken before any further developments go ahead.			Objection raised to the proposal for a possible local review of the Green Belt boundary around Kidlington and to the large number of houses proposed to be built in Cherwell. Understand there is a huge shortfall of housing for people and more houses are needed however the impact it will have on the traffic congestion through Kidlington is a concern. Currently takes up to 30 minutes to travel 2 miles through Kidlington. Congestion is likely to be worse with the opening of the new railway station at Water Eaton.
188/2	Martin and Jennifer	Gibson		Main	62		Modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			Objection raised to the proposal for a possible local review of the Green Belt boundary around Kidlington. The Green Belt around Kidlington has helped to keep the village separate from Oxford over many years. It is pleasant and unspoilt countryside with many well-used footpaths and 'green spaces'. It is much appreciated and enjoyed by large numbers of local residents. Cannot see how any new housing built on Green Belt land can be limited to meeting 'local need' as the Plan suggests. It seems more likely that such housing will simply be used to meet the vastly inflated housing requirement as assessed by the SHMA. The Green Belt is a permanent designation and that Government guidance states that unmet housing need is not a reason for building in the Green Belt.
189/2	Nicholas	Todd		Main	62		Modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			Objection raised to the proposal for a possible local review of the Green Belt boundary around Kidlington. The Green Belt around Kidlington has helped to keep the village separate from Oxford over many years. It is mainly pleasant and unspoilt countryside with many well-used footpaths and 'green spaces'. It is much appreciated and enjoyed by large numbers of local residents. Cannot see how any new housing built on Green Belt land can be limited to meeting 'local need' as the Plan suggests. It seems more likely that such housing will simply be used to meet the vastly inflated housing requirement as assessed by the SHMA. The Green Belt is a permanent designation and that Government guidance states that unmet housing need is not a reason for building in the Green Belt.
204/1	Nik	Lyzba	JPPC / The City of Oxford Charity	Main	62	Support a review of the Green Belt boundaries around Kidlington and specifically in relation to the land to the west of Water Eaton Lane, Gosford. Concerned that the modifications does not identify the scale of any proposed change, does not identify an area for such change and provides no particular guidance for any review. It does not identify a level of growth which should apply to Kidlington as the largest sustainable village but simply leaves the distribution of housing in the rural areas to an overall figure without providing guidance or a framework within which any further plans might be prepared. There is no timescale set for the limited reviews, in comparison to the inclusion of a timescale for a partial review of the Local Plan.	The Plan should identify a specific provision for housing in Kidlington which is unable to be met without review of the Green Belt boundaries and should indicate that a review of those boundaries should embrace the land west of Water Eaton Lane, Gosford.			

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207/5	Jacqueline	Mulliner	Terence O'Rourke Ltd / Blenheim Palace Estate	Main	62	No justification for an amended spatial distribution of homes and that the Plan, as drafted and modified, will not contribute to the aims and objectives of sustainable development if such a restrictive approach is applied to Kidlington. Oppose to the term small scale Green Belt review with reference to Kidlington. Oppose the reference solely to the village's housing needs.	Revise reference from "small-scale" to "moderate-scale" review of the Green Belt. Replace references to "local housing needs" with "housing needs necessary to support economic growth and the achievement of sustainable development."			
213/3	Shelley	Hopper		Main	62		Modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			Objection raised to the proposal for a possible local review of the Green Belt boundary around Kidlington, in particular the area between Stratfield Farm and South Avenue. The Green Belt around Kidlington has helped to keep the village separate from Oxford over many years. It is much appreciated and enjoyed by large numbers of local residents. This area of land is full of wildlife. Cannot see how any new housing built on Green Belt land can be limited to meeting 'local need' as the Plan suggests. The Green Belt is a permanent designation and that Government guidance states that unmet housing need is not a reason for building in the Green Belt.
214/3	K	Thomas		Main	62		Modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			Objection raised to the proposal for a possible local review of the Green Belt boundary around Kidlington. The Green Belt around Kidlington is essential to keep Kidlington separate from larger conurbations.
228/2	Ross	Avery		Main	62	Objects to the proposal for a possible local review of the Green Belt boundary around Kidlington. The Green Belt around Kidlington has helped to keep the village separate from Oxford over many years. It is mainly pleasant and unspoilt countryside with many well-used footpaths and 'green spaces'. It is much appreciated and enjoyed by large numbers of local residents. How can any new housing built on Green Belt land be limited to meeting "local need" as the plan suggests. It seems more likely that such housing will simply be used to meet the vastly inflated housing requirement as assessed by the SHMA. Green Belt is a permanent designation and Government guidance states that unmet housing need is not a reason for building in the Green Belt.				
229/17	Nik	Lyzba	JPPC / The Tripartite (Oxford University,	Main	62					The review of the green belt boundary around the BSP is supported.
262/2	Jason	Hill	Savills	Main	62					Site- Stratfield Farm Kidlington. The representor supports the soundness of the modifications relating to the distribution of housing across the rural villages and potential Green Belt review in Kidlington. They indicate that their client's land is available and capable of delivering a sustainable development in accordance with the criteria laid out in Modification 147 and in the SHLAA assessment of the site.
263/1	Dawn and David	White		Main	62	New housing around Kidlington would appear to be used to meet the vastly inflated SHMA housing requirement. Government guidance states that unmet housing need is not a reason for building in the Green Belt.	Modification 62 should be deleted together with all other references to a Green Belt review around Kidlington to meet local housing need.			
264/6	Andrew	Hornsby-Smith		Main	62			Supports these modifications which allow for the possibility that whilst the initial purpose of the local Green Belt review is for employment, a later review could encompass the remainder of the area of search once Kidlington's local housing need has been assessed further. This is highly likely to trigger the need for a local Green Belt review.		
265/1	Michael	Sims		Main	62	Objection is made to a possible Green Belt review around Kidlington, particularly the area between the river and Mill Street where there are many historic buildings. The network of roads and drains would be unable to cope and the extra traffic on Mill Street, which is used as a rat run from the Oxford Road, would reduce quality of life for residents.	Modification 62 should be deleted together with all references to a Green Belt review around Kidlington.			

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270/5	David	Jackson	Savills / University of Oxford	Main	62	The modifications do not address Oxford's unmet housing need. This approach is inconsistent with the NPPF para 83 and is inadequate given the scale and severity of the housing requirement. It will prolong the housing crisis and put deliverability of the Strategic Economic Plan at risk. A related concern is Green Belt review; the modifications indicate the Green Belt is to be reviewed now to meet local needs, then again to accommodate other development needs, contrary to the NPPF.	Oxford's unmet housing need should be addressed in emerging Local Plans at the earliest opportunity. Necessary joint working should be undertaken now rather than delay delivery and continue to exacerbate housing affordability issues and damage the local economy. Oxford's housing needs have been accommodated in the adjoining authorities in the past with the "country towns strategy" and was acknowledged in the sub-regional spatial strategy for Central Oxfordshire contained in the South East Plan and it would be a departure from past planning strategies for the county for an authority to proceed with its Local Plan without accommodating an element of the housing requirement arising from Oxford.			
271/1	John	Morgan		Main	62	Objection is made to a possible Green Belt review around Kidlington, particularly the area to the north east of Mill Street. This area includes important habitat areas. The area where Mill Street meets Evans Lane is prone to flooding and current drainage infrastructure is inadequate. Green Belt is a permanent designation and government guidance indicates unmet housing need is not a reason to build on it.				
278/1	T	Nichols		Main	62	Objection is made to a possible Green Belt review around Kidlington. The Green Belt keeps Kidlington separate from Oxford and is mainly pleasant countryside with well used footpaths and green spaces, enjoyed by residents. It is difficult to see how building can be limited to local needs and is more likely to be used to meet the vastly inflated SHMA requirements. Government guidance indicates that unmet housing need is not a reason for building in the Green Belt.	Delete Modification 62 together with all references to a Green Belt review around Kidlington to meet local housing need.			
283/3	Ann	Taylor		Main	62	Green Belt is a permanent designation, and government guidance states that unmet housing need is not a reason for building in the Green Belt. Removing long standing Green Belt land would be contrary to government policy.	Modification 62 should be deleted, together with all other references to a Green Belt review around Kidlington to meet local housing needs.			
287/1	N G	Tippett		Main	62	Objection is made to a possible Green Belt review around Kidlington. The Green Belt keeps Kidlington separate from Oxford and is mainly pleasant countryside with well used footpaths and green spaces, enjoyed by residents and visitors. It is difficult to see how building can be limited to local needs and is more likely to be used to meet the vastly inflated SHMA requirements. Government guidance indicates that unmet housing need is not a reason for building in the Green Belt.	Modification 62 should be deleted, together with all other references to a Green Belt review around Kidlington to meet local housing needs.			
288/3	Judy	Hall		Main	62	Objection is made to a possible Green Belt review around Kidlington. It is vital that a gap is kept between Kidlington and Oxford and green spaces maintained.	Modification 62 should be deleted, together with all other references to a Green Belt review around Kidlington to meet local housing needs.			
307/2	Gillian, Richard, Nicholas	Hopcroft		Main	62	Object to possible review of the Green Belt boundary around Kidlington. The local countryside is pleasant and unspoilt with well-used footpaths and green spaces enjoyed and appreciated by many local residents. Do not see how housing can be limited to 'local needs' as the plan suggests and is more likely to be used to meet inflated housing requirements suggested by the SHMA. Green Belt is a permanent designation. Government guidance states housing need is not a reason for building in the Green Belt.	Delete Mod 62			
308/1	Andy and Helen	Lumley		Main	62	Object to development around Kidlington.				
311/1	Linda	Baker		Main	62	Object to the proposed review of the Green Belt review in Kidlington, in particular the area between Stratfield Farm and South Avenue. I understand that the SHMA is proposing to build approx. 200 new houses in this area.	Delete Mod 62 together with all references to a Green Belt Review around Kidlington to meet local housing need.			

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314/3	Alex	Duncan		Main	62	<p>Object to proposed local review of the Green Belt boundary around Kidlington.</p> <p>Green Belt is a permanent designation. Government guidance states that unmet housing need is not a reason for building in the Green Belt. Removing land from the Green Belt to meet housing need is therefore contrary to national policy.</p> <p>The local countryside, unspoilt with many footpaths and green spaces, is enjoyed by many local residents. Do not see how housing can be limited to 'local needs' as the plan suggests. It is likely that such housing will be used to meet the inflated housing requirement as assessed by the SHMA (see previous representation). The policy is therefore not effective.</p> <p>The "Kidlington Masterplan" is given as evidence for this change in policy. This is an unpublished document which has had no public consultation. I therefore consider that this change is not justified.</p>	Delete Mod 62			
315/1	John and Hilary	Maddicott		Main	62	<p>Object to proposed local review of the Green Belt boundary around Kidlington.</p> <p>Green Belt is a permanent designation. Government guidance states that unmet housing need is not a reason for building in the Green Belt. Removing land from the Green Belt to meet housing need is therefore contrary to national policy.</p> <p>The local countryside, unspoilt with many footpaths and green spaces, is enjoyed by many local residents. Do not see how housing can be limited to 'local needs' as the plan suggests. It is likely that such housing will be used to meet the inflated housing requirement as assessed by the SHMA (see previous representation). The policy is therefore not effective.</p> <p>Building on the Kidlington Green Belt will jeopardise and lower the quality of life for many people besides those living in the village.</p> <p>The "Kidlington Masterplan" is given as evidence for this change in policy. This is an unpublished document which has had no public consultation. I therefore consider that this change is not justified.</p>	Delete Mod 62			
061/17	Alan	Lodwick		Main	62	<p>Objects to Policy ESD14 which raises the possibility of a small scale local review of the Green belt boundary around Kidlington if the villages local housing needs cannot be accommodated within the built up area. The green belt around Kidlington contributes towards to the aim of restricting development pressures to protect the character of the City and any relaxation of its boundaries weaken this protection.</p>	Modification 62 should be deleted together with all references elsewhere to a Green Belt Review around Kidlington to meet local housing need, as the modification is unsound.			
061/18	Alan	Lodwick		Main	62	<p>The Kidlington Masterplan is quoted as evidence for this proposed change in policy. However the Masterplan has not been published for public consultation. There has therefore been no opportunity for anyone to see this evidence and therefore the modification is not justified by robust evidence. It will impossible to identify the local people in need of housing.</p>	Modification 62 should be deleted together with all references elsewhere to a Green Belt Review around Kidlington to meet local housing need, as the modification is unsound.			
061/19				Main	62	<p>Government policy in Planning Practice Guidance states that unmet housing need is unlikely to outweigh the harm to the Green Belt and other harm to constitute very special circumstances.</p>	Modification 62 should be deleted together with all references elsewhere to a Green Belt Review around Kidlington to meet local housing need, as the modification is unsound.			
062/3	A and R	Dixon		Main	62					<p>Objects to the possible review of the green belt around Kidlington. This is a unique environment with many ancient paths and wildlife habitats. The Green Belt was created to preserve such areas and this should be protected by the Council not used as a opportunity to increase housing in areas which have already had development, putting a strain on local services and transport.</p>

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063/1	Pete	Merrill		Main	62	Objects to the proposal for a possible local review of the Green Belt boundary around Kidlington. The Green Belt around Kidlington has helped to keep the village separate from Oxford over many years. It is mainly pleasant and unspoilt countryside with many well-used footpaths and 'green spaces'. It is much appreciated and enjoyed by large numbers of local residents. How can any new housing built on Green Belt land be limited to meeting "local need" as the plan suggests. It seems more likely that such housing will simply be used to meet the vastly inflated housing requirement as assessed by the SHMA. Green Belt is a permanent designation and Government guidance states that unmet housing need is not a reason for building in the Green Belt.	Modification 62 is deleted and all references to the Green Belt Review around Kidlington to meet local needs.			
064/2	Stephen	Holdak		Main	62	Objects to the proposal for a possible local review of the Green Belt boundary around Kidlington. The Green Belt around Kidlington has helped to keep the village separate from Oxford over many years. It is mainly pleasant and unspoilt countryside with many well-used footpaths and 'green spaces'. It is much appreciated and enjoyed by large numbers of local residents. How can any new housing built on Green Belt Land can be limited to meeting "local need" as the plan suggests. It seems more likely that such housing will simply be used to meet the vastly inflated housing requirement as assessed by the SHMA. The Green Belt is a permanent designation and Government guidance states that unmet housing need is not a reason for building in the Green Belt.	The Local Plan is unsound and modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			
066/2	Elizabeth	Holdak		Main	62	Objects to the proposal for a possible local review of the Green Belt boundary around Kidlington. The Green Belt around Kidlington has helped to keep the village separate from Oxford over many years. It is mainly pleasant and unspoilt countryside with many well-used footpaths and 'green spaces'. It is much appreciated and enjoyed by large numbers of local residents. How can any new housing built on Green Belt Land can be limited to meeting "local need" as the plan suggests. It seems more likely that such housing will simply be used to meet the vastly inflated housing requirement as assessed by the SHMA. The Green Belt is a permanent designation and Government guidance states that unmet housing need is not a reason for building in the Green Belt.	The Local Plan is unsound and modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			
068/1	Rosemary	Lodwick		Main	62		Modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			Objects to the proposed change to Policy ESD14 stating that "A small scale local review of the Green Belt boundary around Kidlington will also be undertaken as part of Local Plan Part 2 if the village's local housing needs cannot be accommodated within the built up area." and to all other related modifications. Green Belt is a permanent designation and Government guidance states that unmet housing need is not a reason for building in the Green Belt. Removing land from the Green Belt to meet supposed housing need is therefore contrary to national policy. The "Kidlington Masterplan" is given as evidence for this change in policy. However this is an unpublished document which has had no public consultation, and therefore this change is not justified. How can any new housing built on Green Belt Land be limited to meeting "local need". It seems more likely that such housing will simply be used to meet the vastly inflated housing requirement as assessed by the SHMA. The policy is therefore not effective. The Green Belt around Kidlington is one of the village's greatest assets. It is generally 'open' and unspoilt. It includes many footpaths and 'green spaces' and is much enjoyed by large numbers of local residents.

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071/1	Julie	Kyle		Main	62					Objects strongly to the proposal for a possible local review of the Green Belt boundary around Kidlington. The Green Belt around Kidlington has helped to keep the village separate from Oxford over many years. It is mainly pleasant and unspoilt countryside with many well used footpaths and green spaces. It is much appreciated and enjoyed by large number of local residents. How can any new housing built on Green Belt Land can be limited to meeting local need as the plan suggests. It seems more likely that such housing will simply be used to meet the vastly inflated housing requirement as assessed by the SHMA. The Green Belt is a permanent designation and that Government guidance states that unmet housing need is not a reason for building in the GreenBelt. There is no need for more housing. Why can't the council do up old buildings or rebuild old buildings.
073/1	Dinah	Lintott		Main	62	Objects strongly to the proposal for a possible local review of the Green Belt boundary around Kidlington. This is a pleasant, well ordered Village which supports many local shops and local societies and maintains a unique sense of community rather than being simply a dormitory for Oxford. It may be that there is a need for some more affordable houses for local need, but these do not need to be built on the green belt. Once the 'pass has been sold', there will be no stopping developers moving in and building where ever they wish, since there is a crazy suggestion that Cherwell needs on extra 40% housing in the next 17 years.	Considers the plan to be unsound and request that modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			
074/1	Robert	Selway		Main	62	Objects to the proposal for a possible local review of the Green Belt boundary around Kidlington. The Green Belt around Kidlington has helped to keep the village separate from Oxford over many years. Kidlington is already a very large village and has therefore already taken a large amount of expansion. It has relatively little pleasant and unspoilt countryside around its borders. What remains has many well-used footpaths and is home to wide range of wildlife. There are deer, badgers, foxes, lizards, wood peckers and birds of prey in the woods and land around the green belt all of which would be at risk. It is much needed, appreciated and enjoyed by large numbers of local residents. How can any new housing built on the Green Belt land can be limited to meeting "local needs" as the plan suggests. It seems more likely that such housing will simply be used to meet the vastly inflated housing requirement as assessed by the SHMA. The Green Belt is a permanent designation and that Government guidance states that unmet housing need is not a reason for building in the Green Belt. If Green Belt land is removed because of housing pressure, what is the point of having it at all???? and when does its demise stop? Will we have housing all the way to the banks of the Cherwell?	The Plan is unsound and request that modification 62 is deleted together with all references to a Green Belt review around Kidlington to meet local housing need.			
077/1	Maria	Pye		Main	62	Objects to the proposals for a possible local review of the Green Belt around Kidlington. The Green Belt around Kidlington has helped to keep the village separate from Oxford over many years. It is mainly pleasant and unspoilt countryside with many well-used footpaths and green spaces. It is much appreciated and enjoyed by the large numbers of Local residents. How can any new housing built on Green Belt Land be limited to meeting Local need. It seems more likely that such housing will simply be used to meet the vastly inflated housing requirement as assessed by the SHMA. The Green Belt is permanent designation and guidance states that unmet housing need is not a reason for building in the Green Belt.	Consider that the Plan to be unsound and request that modification 62 is deleted together with all references to a Green Belt review around Kidlington to meet local housing need.			

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078/1	Constance	Salter		Main	62	Objects to the proposals for a possible local review of the Green Belt around Kidlington. The Green Belt around Kidlington has helped to keep the village separate from Oxford over many years. It is mainly pleasant and unspoilt countryside with many well-used footpaths and green spaces. It is much appreciated and enjoyed by the large numbers of Local residents. How can any new housing built on Green Belt Land can be limited to meeting local need. It seems more likely that such housing will simply be used to meet the vastly inflated housing requirement as assessed by the SHMA. The Green Belt is permanent designation and guidance states that unmet housing need is not a reason for building in the Green Belt.	Consider that the Plan to be unsound and request that modification 62 is deleted together with all references to a Green Belt review around Kidlington to meet local housing need.			
079/1	Philip	Hine		Main	62	Objects to the proposals for a possible local review of the Green Belt around Kidlington. The Green Belt around Kidlington has helped to keep the village separate from Oxford over many years. It is mainly pleasant and unspoilt countryside with many well-used footpaths and green spaces. It is much appreciated and enjoyed by the large numbers of local residents. How can any new housing built on Green Belt land be limited to meeting local need. The land behind Webbs Way is prone to flooding every winter over a large area and the proximity of Rushy Meadows needs to be taken into account. The area is also populated by badgers, a protected species. The SHMA is based on over inflated nationwide needs to cope with an assumed ever expanding population and a demand that additional housing is spread around this country as a whole. The Green Belt is permanent designation and guidance states that unmet housing need is not a reason for building in the Green Belt.	Considers the Plan to be unsound and requests that modification 62 is deleted together with all references to a Green Belt review around Kidlington to meet local housing need.			
179/42	Matthew	Bates	Oxford City Council	Main	62	Object that the Plan now provides a policy mechanism for reviewing the Green Belt around Kidlington to meet "local" housing need, relating to the increase in the rural housing allocation, whilst not recognising that this is also part of, and inseparable from, the wider needs of the HMA.	If the Plan were to progress, the City Council insists that references to 'local' Green Belt reviews are deleted and instead text introduced into Policy ESD14 and supporting text to set out a timetable for a strategic joint review of the Green Belt, should this be necessary (as expected) to meet both Cherwell's housing needs and those of the wider HMA (detailed suggestions provided)			
179/43	Matthew	Bates	Oxford City Council	Main	62	Para' B.253 There is nothing in national Green Belt policy about 'increased activity, traffic' as justification for Green Belt designation. Similarly no reference to 'restrain development pressures' per se.	Amend as follows B.253 Part of the district falls within the Oxford Green Belt. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the most important attribute of Green Belts is their openness. The Oxford Green Belt was designated to restrain development pressures which could damage in part to protect the character of Oxford City and its heritage through increased activity, traffic and the outward sprawl of the urban area. Similarly, the character of Oxford in a rural setting cannot be maintained without the protection of the spatial relationship of Oxford with nearby settlements and the maintenance of the character of the intervening countryside.			
179/44	Matthew	Bates	Oxford City Council	Main	62	Para B.255 - This is historical context / evidence that is irrelevant to this Plan.	Delete para: B.255 Work undertaken for the revoked South East Plan did not identify a need for strategic review of the Green Belt boundaries in Cherwell District. The plan indicated that selective review should take place to the south of Oxford and stated that if the initial area of search to the south of Oxford did not prove a suitable candidate for review, a wider review across the area could take place. A legal challenge to this section of the South East Plan was issued on the grounds that proper environmental assessment of the proposals and reasonable alternatives had not taken place. The Treasury Solicitor conceded the legal challenge but the issue was not finally resolved before revocation of the plan.			

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179/45	Matthew	Bates	Oxford City Council	Main	62	B.257: It is premature and subjective to make reference to the 'vulnerable Kidlington Gap' ahead of any joint formal Green Belt assessment.	Amend para B.257 as follows: B.257 It is essential that the impact on the Green Belt is minimised, therefore priority will be given to locations that lie adjacent to existing development, avoid the coalescence of settlements, protect the vulnerable Kidlington Gap and otherwise have the least impact possible on the Green Belt.			
179/46	Matthew	Bates	Oxford City Council	Main	62	Policy ESD 14: Change needed to ensure regard is had to the intended permanence of the Green Belt boundary, and to take account of the pressures within, and wider needs of, the housing market area.	Delete text and add para' as follows: A small scale local review of the Green Belt boundary in the vicinity of Langford Lane Kidlington and Begbroke Science Park will be undertaken as part of the Local Plan Part 2, in order to accommodate employment needs (See Policy Kidlington 1). A small scale local review of the Green Belt boundary around Kidlington will also be undertaken as part of Local Plan Part 2 if the village's local housing needs cannot be accommodated within the built up area. Further small scale local review of the Green Belt boundary will only be undertaken where exceptional circumstances can be demonstrated. Policy ESD 14 will be reviewed as part of an early review of the <u>Cherwell Local Plan 2011-31 to take account of the Oxfordshire</u>			
047/19	Matthew	Coyne	Banbury Town Council	Main	63					objection to the allocation of site Banbury 17 (South of Saltway) because of its impact on the landscape. Site should be kept as a Green Buffer.
137/5	Theresa	Goss	Adderbury Parish Council	Main	63	The reduction in the buffer zone between Twyford and Banbury means that coalescence is occurring, resulting in a rural village becoming an urban village.				
144/6	Theresa	Goss	Bloxham Parish Council	Main	63	There is no map indicating a green buffer between Bloxham and its neighbouring villages to ensure that these villages are protected and separated. As stated in the modification this would be welcomed to ensure that the land in the required green buffers would contribute to the protection of the character of the villages.	To provide the Green Buffers between Bloxham, Milton and Adderbury villages. Bloxham and Milcombe. Bloxham and The Barfords, Bloxham and Tadmarton and these to be shown on a plan.			
251/6	Heather	Vickers	Planning Potential / Gleeson Developments Ltd	Main	63	Policy ESD 15 is an unnecessary repetition of ESD13 and ESD16 and is not required. Policy ESD 13 can be suitably modified to expand the relevant criteria-base policy (for example, to include protection for vulnerable gaps between settlements). The green buffers have not been approached in a consistent way (Proposals Map) The policy is not justified by the Council's evidence base. The policy is inconsistent with the Proposed Modifications which proposes development allocations within areas considered to be integral parts of the Green Buffer.	Delete Policy ESD 15, and supporting text in relation to Green Buffers.			
137/6	Theresa	Goss	Adderbury Parish Council	Main	64	Use of the term "urban- rural fringe" is inappropriate use of English to hide the buffer zone reduction between Banbury and Twyford. The buffer zone will no longer avoid coalescence. Reference is made to an appeal decision at Hurstpierpoint ref 13/01250/FUL relating to coalescence.				
235/2	Simon	Gamage	RPS / Mr Bratt	Main	64					Supports the title change to Policy ESD15.
235/3	Simon	Gamage	RPS / Mr Bratt	Main	64		Cotefield business park should be removed form the Green Buffer			Objects to the on-going inclusion of Cotefield business park within the Green Buffer.

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251/7	Heather	Vickers	Planning Potential / Gleeson Developments Ltd	Main	64	Policy ESD 15 is an unnecessary repetition of ESD13 and ESD16 and is not required. Policy ESD 13 can be suitably modified to expand the relevant criteria-base policy (for example, to include protection for vulnerable gaps between settlements). The green buffers have not been approached in a consistent way (Proposals Map) The policy is not justified by the Council's evidence base. The policy is inconsistent with the Proposed Modifications which proposes development allocations within areas considered to be integral parts of the Green Buffer.	Delete Policy ESD 15, and supporting text in relation to Green Buffers.			
191/13	Michael	Robson	Cerda Planning Ltd / CALA Homes (Midlands) Ltd	Main	65		Policy ESD 15 should be deleted.			Policy ESD 15 creates an area of restraint to development and is in direct conflict to the positively prepared approach to policy making. The approach adopts a blanket policy, which results in an unnecessary layering of policy constraints that fetters future sustainable extensions, for example to Bicester, from coming forward to meet the full objectively assessed needs of the District. Additional land is required to deliver housing in the District but it is difficult to see how this can be accommodated at sustainable locations when a blanket green buffer policy is applied. Green buffers on the edge of Bicester are not justified.
235/11	Simon	Gamage	RPS / Mr Bratt	Main	65					The green buffers continue to be an example of negative and restrictive planning
251/8	Heather	Vickers	Planning Potential / Gleeson Developments Ltd	Main	65	Policy ESD 15 is an unnecessary repetition of ESD13 and ESD16 and is not required. Policy ESD 13 can be suitably modified to expand the relevant criteria-base policy (for example, to include protection for vulnerable gaps between settlements). The green buffers have not been approached in a consistent way (Proposals Map) The policy is not justified by the Council's evidence base. The policy is inconsistent with the Proposed Modifications which proposes development allocations within areas considered to be integral parts of the Green Buffer.	Delete Policy ESD 15, and supporting text in relation to Green Buffers.			
268/4	Darren	Bell	David Lock Associates / Hallam Land Management	Main	65	Policy ESD15 is not wholly consistent with the NPPF, and applies an unnecessary and arbitrary restriction on sites which could deliver housing. Green buffers could hinder the delivery of 750 dwellings at Category A villages. It is therefore not a positively prepared policy and is not justified by underlying evidence.	Policy ESD15 should be deleted to ensure suitable land for development is not prevented from coming forward over the plan period by an arbitrary designation.			
166/54	Helen	Marshall	CPRE Oxfordshire	Main	66	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			
061/20	Alan	Lodwick		Main	66	Objects to the use of the SHMA figures to inform the Local Plan.	All Modifications relating to the SHMA should be deleted.			
166/55	Helen	Marshall	CPRE Oxfordshire	Main	67	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			
243/1	Alex	Wilson	Barton Willmore / A2 Dominion South	Main	67	The Main Modifications underestimate the contribution that NWB can make to housing land supply in the plan period. In consultation with Cherwell District Council and Oxfordshire County Council, A2D has tested the likely rate of delivery. Population modelling has tested a higher rate, amounting to 3,773 new homes by 2031. Planning applications have been submitted on behalf of A2D for a further 3500 new homes with committee resolution programmed early 2015.				

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243/3	Alex	Wilson	Barton Willmore / A2 Dominion South	Main	67	The Main Modifications underestimate the contribution that NWB can make to housing land supply in the plan period. In consultation with Cherwell District Council and Oxfordshire County Council, A2D has tested the likely rate of delivery. Population modelling has tested a higher rate, amounting to 3,773 new homes by 2031. Planning applications have been submitted on behalf of A2D for a further 3500 new homes with committee resolution programmed early 2015.	Change the plan to reflect a higher rate of delivery by 2031, amounting to 3,773 new homes.			
253/4	Michael	Lowndes	Turley / P3Eco Group	Main	67	Supports the principle of the increase in new homes at North West Bicester from 5,000 – 6,000. But the upper limit is arbitrary and the site is capable of delivering a greater number of homes. Not clear upon what evidence the figures have been founded. The North West Bicester Masterplan (May 2014) does not yet specify a phasing, implementation or delivery schedule which is subject to agreement with the P3Eco Group and all other interested parties. The SHLAA Update 2014 is based on A2Dominion's land interests only.	There should be no restriction on the amount of housing that can come forward during the Local Plan period at NW Bicester			
061/21	Alan	Lodwick		Main	67	Objects to the use of the SHMA figures to inform the Local Plan.	All Modifications relating to the SHMA should be deleted.			
167/05	Colin	Cockshaw	Bicester Against Eco-Con (BAECon)	Main	67	Taking into account also Cherwell's historic record of under-performance in housing completions, we would argue that the increased rate of development at NW Bicester is exceptionally optimistic and unlikely to be achieved. The proposed modifications are unjustified and likely to be ineffective for these reasons. There is concerns expressed over Bicester's infrastructure. With regard to the planned employment provision, we note that there is an aim to provide 700 -1000 jobs on a business park within the Eco-development, plus an unspecified number in local shops and services and an unspecified number of jobs undertaken by home-workers living in the development. However, it appears that the bulk of the jobs required for the development are to be provided in unspecified locations elsewhere in Bicester and it is by no means clear whether these would be 'earmarked' for eco-development residents or whether they are simply expected to be an unspecified part of the future provision of job opportunities in the town. In the latter case, it cannot be argued that these are directly related as they will be open to anyone, whether resident in Bicester or not, and this raises the likelihood of more workers within the development having jobs outside of Bicester.	Given that the development has commenced, we would support a large reduction in this allocation to achieve development well-related to the town and wholly achievable within the Plan period to serve as a true exemplar of eco-development. We would then argue for land to be released within or on the edge of the Green Belt closer to Oxford following a Green Belt review to ensure that Cherwell's housing 'targets' can be achieved within the Plan period.			
167/05	Colin	Cockshaw	Bicester Against Eco-Con (BAECon)	Main	68	Taking into account also Cherwell's historic record of under-performance in housing completions, we would argue that the increased rate of development at NW Bicester is exceptionally optimistic and unlikely to be achieved. The proposed modifications are unjustified and likely to be ineffective for these reasons. There is concerns expressed over Bicester's infrastructure. With regard to the planned employment provision, we note that there is an aim to provide 700 -1000 jobs on a business park within the Eco-development, plus an unspecified number in local shops and services and an unspecified number of jobs undertaken by home-workers living in the development. However, it appears that the bulk of the jobs required for the development are to be provided in unspecified locations elsewhere in Bicester and it is by no means clear whether these would be 'earmarked' for eco-development residents or whether they are simply expected to be an unspecified part of the future provision of job opportunities in the town. In the latter case, it cannot be argued that these are directly related as they will be open to anyone, whether resident in Bicester or not, and this raises the likelihood of more workers within the development having jobs outside of Bicester.	Given that the development has commenced, we would support a large reduction in this allocation to achieve development well-related to the town and wholly achievable within the Plan period to serve as a true exemplar of eco-development. We would then argue for land to be released within or on the edge of the Green Belt closer to Oxford following a Green Belt review to ensure that Cherwell's housing 'targets' can be achieved within the Plan period.			
151/8	Jan	Molyneux	Stephen Bowley Planning Consultancy / Shipton Ltd	Main	68	The needs of Kidlington and North Oxford should not be met through piecemeal identification of small green belt sites	The plan should consider a major housing and employment allocation at Shipton on Cherwell			

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155/1	Peter	Bateman	Framptons Planning / Albion Land Ltd	Main	68	The statement "It is anticipated that the business park at the South East corner of the allocation will generate between 700-1000 jobs in use Class B1, B2 and B8 early in the plan period" is not a land use planning policy but is an aspiration which could be put into the supporting text. Policy Bicester 1 is not positively prepared in the context of bringing forward employment land at NW Bicester. The LPA has failed to meaningfully engage with Albion Land Ltd. The restriction 'Use Classes B1 with limited B2 and B8' is a barrier to investment contrary to the NPPF, is not supported by evidence and will not provide confidence for investors. It would also provide uncertainty of the height of buildings that would be permitted. It would also mean that the realignment of Howes Lane will not come forward in isolation to securing permission for employment uses. Policy Bicester 2 (Graven Hill) provides for 'Mixed B1, B2 and B8 uses'.	The aspiration for this part of the site to come forward early in the plan period is realistic only if Policy Bicester 1 allows for a flexible use between Class B1, B2 and B8. Market signals and business development needs are for Class B1 (b/c); B2 and B8 purposes. Provision for B1(a) is likely to be as an ancillary use. The policy should provide for 'Mixed B1, B2 and B8 uses' and allow for buildings up to 16.75 metres high.			
243/2	Alex	Wilson	Barton Willmore / A2 Dominion South	Main	68	Policy Bicester 1 should refer to as many jobs as homes, not a specific number. We consider a Local Plan should not require jobs to be delivered but require the development to make sufficient provision for the required number of jobs to be delivered in accordance with the agreed economic strategy	Policy Bicester 1 should refer to as many jobs as homes, not a specific number. The policy and supporting paragraphs should acknowledge a range of uses will generate employment at NWB, including non Class B Uses such as retail and education as reflected in Modification 70. The policy should seek the provision of as many jobs as homes, in a variety of activities, which are appropriate for the development, with the majority of the employment opportunities created on site, except where they are better located elsewhere within Bicester.			
167/05	Colin	Cockshaw	Bicester Against Eco-Con (BAECon)	Main	69	Taking into account also Cherwell's historic record of under-performance in housing completions, we would argue that the increased rate of development at NW Bicester is exceptionally optimistic and unlikely to be achieved. The proposed modifications are unjustified and likely to be ineffective for these reasons. There is concerns expressed over Bicester's infrastructure.	Given that the development has commenced, we would support a large reduction in this allocation to achieve development well-related to the town and wholly achievable within the Plan period to serve as a true exemplar of eco-development. We would then argue for land to be released within or on the edge of the Green Belt closer to Oxford following a Green Belt review to ensure that Cherwell's housing 'targets' can be achieved within the Plan period.			
097/8	Sue	Mackrell	Bicester Town Council	Main	69	Welcome the increase in identified employment land in the Bicester area and recognition that an increase in housing must be accompanied by an increase in job opportunities. The plan does not go far enough in this regard. Strongly oppose the siting of B8 storage and distribution figures on the NW Bicester site since there are more suitable locations, for example, the rail head of Graven Hill.	Bicester needs to attract higher end, higher aspirational jobs. Attracting a broad employment base is essential to future economic viability - for Bicester and the wider district. Locate B8 facilities at the rail head of Graven Hill, rather than the NW Bicester site.			
155/2	Peter	Bateman	Framptons Planning / Albion Land Ltd	Main	69	The statement "It is anticipated that the business park at the South East corner of the allocation will generate between 700-1000 jobs in use Class B1, B2 and B8 early in the plan period" is not a land use planning policy but is an aspiration which could be put into the supporting text. Policy Bicester 1 is not positively prepared in the context of bringing forward employment land at NW Bicester. The LPA has failed to meaningfully engage with Albion Land Ltd. The restriction 'Use Classes B1 with limited B2 and B8' is a barrier to investment contrary to the NPPF, is not supported by evidence and will not provide confidence for investors. It would also provide uncertainty of the height of buildings that would be permitted. It would also mean that the realignment of Howes Lane will not come forward in isolation to securing permission for employment uses. Policy Bicester 2 (Graven Hill) provides for 'Mixed B1, B2 and B8 uses'.	The aspiration for this part of the site to come forward early in the plan period is realistic only if Policy Bicester 1 allows for a flexible use between Class B1, B2 and B8. Market signals and business development needs are for Class B1 (b/c); B2 and B8 purposes. Provision for B1(a) is likely to be as an ancillary use. The policy should provide for 'Mixed B1, B2 and B8 uses' and allow for buildings up to 16.75 metres high.			
166/56	Helen	Marshall	CPRE Oxfordshire	Main	69	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			
194/3	Rachael	Blakey	Bucknell Parish Council	Main	69					The modification reduces the proposed 'employment land' in NW Bicester from 32ha to 10ha while at the same time increasing the target for job opportunities from 1793 to at least 3000 over the Plan period. This appears to be contradictory.

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243/4	Alex	Wilson	Barton Willmore / A2 Dominion South	Main	69	Policy Bicester 1 should refer to as many jobs as homes, not a specific number. We consider a Local Plan should not require jobs to be delivered but require the development to make sufficient provision for the required number of jobs to be delivered in accordance with the agreed economic strategy	Policy Bicester 1 should refer to as many jobs as homes, not a specific number. The policy and supporting paragraphs should acknowledge a range of uses will generate employment at NWB, including non Class B Uses such as retail and education as reflected in Modification 70. The policy should seek the provision of as many jobs as homes, in a variety of activities, which are appropriate for the development, with the majority of the employment opportunities created on site, except where they are better located elsewhere within Bicester			
243/5	Alex	Wilson	Barton Willmore / A2 Dominion South	Main	69	The Main Modifications underestimate the contribution that NWB can make to housing land supply in the plan period. In consultation with Cherwell District Council and Oxfordshire County Council, A2D has tested the likely rate of delivery. Population modelling has tested a higher rate, amounting to 3,773 new homes by 2031. Planning applications have been submitted on behalf of A2D for a further 3500 new homes with committee resolution programmed early 2015.	Change the plan to reflect a higher rate of delivery by 2031, amounting to 3,773 new homes.			
061/22	Alan	Lodwick		Main	69	Objects to the use of the SHMA figures to inform the Local Plan.	All Modifications relating to the SHMA should be deleted.			
167/05	Colin	Cockshaw	Bicester Against Eco-Con (BAECon)	Main	70	Taking into account also Cherwell's historic record of under-performance in housing completions, we would argue that the increased rate of development at NW Bicester is exceptionally optimistic and unlikely to be achieved. The proposed modifications are unjustified and likely to be ineffective for these reasons. There is concerns expressed over Bicester's infrastructure. With regard to the planned employment provision, we note that there is an aim to provide 700 -1000 jobs on a business park within the Eco-development, plus an unspecified number in local shops and services and an unspecified number of jobs undertaken by home-workers living in the development. However, it appears that the bulk of the jobs required for the development are to be provided in unspecified locations elsewhere in Bicester and it is by no means clear whether these would be 'earmarked' for eco-development residents or whether they are simply expected to be an unspecified part of the future provision of job opportunities in the town. In the latter case, it cannot be argued that these are directly related as they will be open to anyone, whether resident in Bicester or not, and this raises the likelihood of more workers within the development having jobs outside of Bicester.	Given that the development has commenced, we would support a large reduction in this allocation to achieve development well-related to the town and wholly achievable within the Plan period to serve as a true exemplar of eco-development. We would then argue for land to be released within or on the edge of the Green Belt closer to Oxford following a Green Belt review to ensure that Cherwell's housing 'targets' can be achieved within the Plan period.			
002/3	Gary	Bell		Main	70	The proposed wording contains vague deliverables for a very important aspect of the development. It also indicates a rather 'hoped-for' strategy than a 'planned one'. Only 1,000 B use class jobs will be provided but when it comes to the bulk of the jobs that will be required it only refers to home working and other jobs 'away from the site'. This is very poor and non-existent as a strategy for the vital need for employment of 6,000 people. The proposed wording makes the strategy worse as it does not detail the legal need for a developer to provide evidence of new job creation prior to any building taking place; does not specify precisely how the new jobs will be measured; there should be no differentiation as to whether a job being created is created on the NW Bicester site or not. What would stop all the other developments (outside of NW Bicester) equally having a claim to those newly created jobs and thus massive double accounting taking place. The lack of consideration to the measuring of jobs created in the document makes it lack effectiveness and also the lack of strategy in this vital area is alarming.	The Plan should consider ways of measuring the new jobs being created and how they could be identified by new developments and the Eco-town PPS Supplement.		No comment	

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155/3	Peter	Bateman	Framptons Planning / Albion Land Ltd	Main	70	The statement "It is anticipated that the business park at the South East corner of the allocation will generate between 700-1000 jobs in use Class B1, B2 and B8 early in the plan period" is not a land use planning policy but is an aspiration which could be put into the supporting text. Policy Bicester 1 is not positively prepared in the context of bringing forward employment land at NW Bicester. The LPA has failed to meaningfully engage with Albion Land Ltd. The restriction 'Use Classes B1 with limited B2 and B8' is a barrier to investment contrary to the NPPF, is not supported by evidence and will not provide confidence for investors. It would also provide uncertainty of the height of buildings that would be permitted. It would also mean that the realignment of Howes Lane will not come forward in isolation to securing permission for employment uses. Policy Bicester 2 (Graven Hill) provides for 'Mixed B1, B2 and B8 uses'.	The aspiration for this part of the site to come forward early in the plan period is realistic only if Policy Bicester 1 allows for a flexible use between Class B1, B2 and B8. Market signals and business development needs are for Class B1 (b/c); B2 and B8 purposes. Provision for B1(a) is likely to be as an ancillary use. The policy should provide for 'Mixed B1, B2 and B8 uses' and allow for buildings up to 16.75 metres high.			
194/4	Rachael	Blakey	Bucknell Parish Council	Main	70					The modification reduces the proposed 'employment land' in NW Bicester from 32ha to 10ha while at the same time increasing the target for job opportunities from 1793 to at least 3000 over the Plan period. This appears to be contradictory.
243/6	Alex	Wilson	Barton Willmore / A2 Dominion South	Main	70	Policy Bicester 1 should refer to as many jobs as homes, not a specific number. We consider a Local Plan should not require jobs to be delivered but require the development to make sufficient provision for the required number of jobs to be delivered in accordance with the agreed economic strategy.	Policy Bicester 1 should refer to as many jobs as homes, not a specific number. The policy and supporting paragraphs should acknowledge a range of uses will generate employment at NWB, including non Class B Uses such as retail and education as reflected in Modification 70. The policy should seek the provision of as many jobs as homes, in a variety of activities, which are appropriate for the development, with the majority of the employment opportunities created on site, except where they are better located elsewhere within Bicester.			
167/05	Colin	Cockshaw	Bicester Against Eco-Con (BAECon)	Main	71	Taking into account also Cherwell's historic record of under-performance in housing completions, we would argue that the increased rate of development at NW Bicester is exceptionally optimistic and unlikely to be achieved. The proposed modifications are unjustified and likely to be ineffective for these reasons. There is concerns expressed over Bicester's infrastructure. With regard to the planned employment provision, we note that there is an aim to provide 700 -1000 jobs on a business park within the Eco-development, plus an unspecified number in local shops and services and an unspecified number of jobs undertaken by home-workers living in the development. However, it appears that the bulk of the jobs required for the development are to be provided in unspecified locations elsewhere in Bicester and it is by no means clear whether these would be 'earmarked' for eco-development residents or whether they are simply expected to be an unspecified part of the future provision of job opportunities in the town. In the latter case, it cannot be argued that these are directly related as they will be open to anyone, whether resident in Bicester or not, and this raises the likelihood of more workers within the development having jobs outside of Bicester.	Given that the development has commenced, we would support a large reduction in this allocation to achieve development well-related to the town and wholly achievable within the Plan period to serve as a true exemplar of eco-development. We would then argue for land to be released within or on the edge of the Green Belt closer to Oxford following a Green Belt review to ensure that Cherwell's housing 'targets' can be achieved within the Plan period.			
097/9	Sue	Mackrell	Bicester Town Council	Main	71	Strongly oppose the siting of B8 storage and distribution figures on the NW Bicester site since there are more suitable locations, for example, the rail head of Graven Hill.	Bicester needs to attract higher end, higher aspirational jobs. Attracting a broad employment base is essential to future economic viability - for Bicester and the wider district. Locate B8 facilities at the rail head of Graven Hill, rather than the NW Bicester site.	Pleased to see the increase of the identified need for burial ground space from 1ha to 4ha. This is a more realistic figure given the increased growth.		
155/5	Peter	Bateman	Framptons Planning / Albion Land Ltd	Main	71	It will not be viable to include a District Heating System on the 4.5 ha of land being promoted for residential development by Albion Land.	Policy Bicester 1 should be amended to enable demonstration of Code for Sustainable Homes Level 5 at the completion of the wider site as this will allow the dwellings to connect to the District Heating systems. Flexibility should be provided for properties in early phases to achieve CSH4 but be capable of achieving CSH5 once the wider eco-town is completed as this will facilitate delivery.			

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161/1	Martin	Small	English Heritage	Main	71		key site specific design and place shaping principle to read "Development proposals to be accompanied and influenced by a landscape and visual impact assessment and a heritage impact assessment". Prefer to see the deletion of "where possible" – the National Planning Policy Framework notes that heritage assets are "irreplaceable" and that "any harm or loss should require clear and convincing justification" (paragraph 132)).			English Heritage welcomes the addition of a requirement to Policy Bicester 1 that development proposals should be accompanied by a heritage assessment, although we would. English Heritage also welcomes, in principle, the addition at the Submission stage of a new principle: "The retention and respect for important existing buildings and heritage assets with a layout to incorporate these where possible and consideration of Grade II listed buildings outside the site".
212/1	Les	Sibley	Local/County Councillors	Main	71	Objection raised to any B8 uses (warehousing and distribution) on Howes Lane as these are large developments/buildings that employ very few people, and will be a blight on the skyline of the new and existing local residential area. The surrounding roads will see a substantial increase in the number of HGV and other vehicle movements. The area is defined as an "Eco Town" and should therefore promote development that encourages employment in high tech eco industries. B8 warehousing would be a really bad use on the site and would employ very few people in contradiction to the requirement to employ the maximum number of people in the area to prevent travel.	All references to B8 should be deleted except where excellent infrastructure exists such as Graven Hill.			
243/10	Alex	Wilson	Barton Willmore / A2 Dominion South	Main	71	The modification to the policy includes a requirement that "A Carbon Management Plan shall be produced to support all applications for employment development". However, there is no confirmation of what this may require and it does not recognise the size or scale that of any particular application and may present a significant economic burden to small business applications.	Confirm the requirements of the "Carbon Management Plan" and the size/scale of the application to which the requirements would apply.			
243/11	Alex	Wilson	Barton Willmore / A2 Dominion South	Main	71	The Main Modifications underestimate the contribution that NWB can make to housing land supply in the plan period. In consultation with Cherwell District Council and Oxfordshire County Council, A2D has tested the likely rate of delivery. Population modelling has tested a higher rate, amounting to 3,773 new homes by 2031. Planning applications have been submitted on behalf of A2D for a further 3500 new homes with committee resolution programmed early 2015.	Change the plan to reflect a higher rate of delivery by 2031, amounting to 3,773 new homes.			
243/12	Alex	Wilson	Barton Willmore / A2 Dominion South	Main	71	The Modifications now state that crossings (plural) of the railway line will be provided. Provisions should not be determined in the policy.	Remove from policy			
243/13	Alex	Wilson	Barton Willmore / A2 Dominion South	Main	71	The Modifications also make reference to "changes and improvements to Howes Lane and Lords Lane to facilitate integration of new development within the town". This is incorrect. This Strategic Infrastructure Scheme should be referred to as the new A4095 NW Strategic Link Road in the Local Plan. Improvements to this strategic link road are required to meet any planned growth in Bicester, independent or regardless of any development at NWB as evidenced by modelling undertaken by White Young Green on behalf of the Council.	"Changes and improvements to Howes Lane and Lords Lane to facilitate integration of new development within the town" should be referred to as the new A4095 NW Strategic Link Road in the Local Plan (required to meet any planned growth in Bicester)			
243/14	Alex	Wilson	Barton Willmore / A2 Dominion South	Main	71	The requirement for a burial ground requires further testing in relation to site suitability. Any such facility will be of benefit to the wider Bicester area and therefore, any provision should be supported through funding secured from other sites. It is not considered that the Council has demonstrated that the development itself gives rise to the need for a burial ground. The proposed policy is unnecessarily prescriptive. Whilst A2D is willing to make land available to the Council, it should not generate a further cost requirement or liability as this would not be consistent with the requirements of the CIL regulations.	Make policy less prescriptive			

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243/15	Alex	Wilson	Barton Willmore / A2 Dominion South	Main	71	The Main Modifications state the utilities and infrastructure strategy will be "set out in an Energy Strategy and Water Cycle Study. The Water Cycle Study shall cover water efficiency and demand management, water quality and how it will be protected and improved, WFD compliance, surface water management to avoid increasing flood risk and water services infrastructure improvement requirements and their delivery, having regard to the Environment Agency's guidance on Water Cycle Studies". It is not appropriate to include this level of detail in the Local Plan.	Make policy less prescriptive			
243/16	Alex	Wilson	Barton Willmore / A2 Dominion South	Main	71	The SHLAA currently makes reference to 600 homes in total. We presume that this is a typing error and should be corrected to identify 6,000 dwellings. The SHLAA should also reflect A2D's modelling conclusions on the number of dwellings that could be delivered by 2031.	Amend conclusions of the SHLAA			
243/7	Alex	Wilson	Barton Willmore / A2 Dominion South	Main	71	The site area should be updated to approximately 400 hectares.	The site area should be updated to approximately 400 hectares.			
243/8	Alex	Wilson	Barton Willmore / A2 Dominion South	Main	71	The policy and plans should reflect the current national definition of zero carbon, relative to regulated energy (as defined in the Building Regulations) only.	The policy and plans should reflect the current national definition of zero carbon, relative to regulated energy (as defined in the Building Regulations) only.			
243/9	Alex	Wilson	Barton Willmore / A2 Dominion South	Main	71	Policy Bicester 1 should refer to as many jobs as homes, not a specific number. We consider a Local Plan should not require jobs to be delivered but require the development to make sufficient provision for the required number of jobs to be delivered in accordance with the agreed economic strategy.	Policy Bicester 1 should refer to as many jobs as homes, not a specific number. The policy and supporting paragraphs should acknowledge a range of uses will generate employment at NWB, including non Class B Uses such as retail and education as reflected in Modification 70. The policy should seek the provision of as many jobs as homes, in a variety of activities, which are appropriate for the development, with the majority of the employment opportunities created on site, except where they are better located elsewhere within Bicester.			
253/5	Michael	Lowndes	Turley / P3Eco Group	Main	71	Supports the principle of the increase in new homes at North West Bicester from 5,000 – 6,000. But the upper limit is arbitrary and the site is capable of delivering a greater number of homes. Not clear upon what evidence the figures have been founded. The North West Bicester Masterplan (May 2014) does not yet specify a phasing, implementation or delivery schedule which is subject to agreement with the P3Eco Group and all other interested parties. The SHLAA Update 2014 is based on A2Dominion's land interests only.	There should be no restriction on the amount of housing that can come forward during the Local Plan period at NW Bicester.			
300/2	Penny	Silverwood	Berks, Bucks and Oxon Wildlife Trust (BBOWT)	Main	71					Supports bullet point 23 (habitats and species).
301/65	Bev	Hindle	Oxfordshire County Council	Main	71	Policy Bicester 1 – North West Bicester Eco-Town Under 'Infrastructure needs':- Energy. Viridor have renamed the Ardley Energy from Waste Facility to Ardley Energy recovery Facility in line with company policies for all their facilities.	The need to consider sourcing waste heat from the Ardley ERF is supported. Change reference to 'Ardley Energy from Waste facility' to "Energy Recovery Facility".			
301/66	Bev	Hindle	Oxfordshire County Council	Main	71	Education - The first bullet states that "There should be a maximum walking distance of 800 metres from homes to the nearest school". This should clarify that it refers to primary schools and not secondary schools. Archaeology - The site has been the subject of an archaeological field evaluation which recorded a number of archaeological sites and features. A condition ensuring that a staged programme of archaeological investigation is undertaken will need to be attached to any planning permission granted for the site.	Amend wording as follows: "There should be a maximum walking distance of 800 metres from homes to the nearest <u>primary</u> school". Amend the wording in the 'Key site specific design and place shaping principles' section to include and additional bullet point: " <u>Undertake a staged programme of archaeological investigation</u> ".			

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167/07	Colin	Cockshaw	Bicester Against Eco-Con (BAECon)	Main	72	<p>We support this allocation in principle, but continue to be concerned that there is a need for more comprehensive highway improvements for this part of the town as it develops. The A41 is a major cross-country highway which severs the site from the town and improved access and underpasses are an inadequate response, particularly bearing in mind the additional development now proposed at SE Bicester. We consider a new section of ring road is needed taking A41 to the south of Graven Hill, so that this whole area can be successfully integrated into the urban area. Without this we consider the Plan would not be positively prepared as it would lack an important infrastructure requirement.</p> <p>We note from the Housing Trajectory table on Page 155 that the intention is to complete the whole development before 2031. However, we would note the Council's intention that a substantial part of this development is to be a self-build scheme for individuals or groups of people to build their own homes. It is suggested that more than 1000 such homes could be envisaged.</p> <p>We support the principle, but would point out that such development is likely to proceed at a much slower pace than conventional estate development by volume builders. This raises some doubt as to whether the expected rate of development will be achieved. Thus the Plan could prove ineffective in this respect.</p>	<p>We consider a new section of ring road is needed taking the A41 to the south of Graven Hill, so that this whole area (including SE Bicester) can be successfully integrated with the urban area. And this will help to ensure that the Plan is more sound in respect of highway infrastructure.</p>			
166/57	Helen	Marshall	CPRE Oxfordshire	Main	72	<p>CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.</p>	<p>The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.</p>			
196/2	Steven	Sensecall	Kemp & Kemp LLP / Leda Properties	Main	72			<p>The increase from 1900 to 2100 new homes on the Graven Hill site (Bicester 2) is supported. This will help the Council to achieve its housing targets.</p>		
061/23	Alan	Lodwick		Main	72	<p>Objects to the use of the SHMA figures to inform the Local Plan.</p>	<p>All Modifications relating to the SHMA should be deleted.</p>			
196/3	Steven	Sensecall	Kemp & Kemp LLP / Leda Properties	Main	73			<p>The inclusion of land at Langford Park Farm under Policy Bicester 2 is supported.</p>		
167/07	Colin	Cockshaw	Bicester Against Eco-Con (BAECon)	Main	73	<p>We support this allocation in principle, but continue to be concerned that there is a need for more comprehensive highway improvements for this part of the town as it develops. The A41 is a major cross-country highway which severs the site from the town and improved access and underpasses are an inadequate response, particularly bearing in mind the additional development now proposed at SE Bicester. We consider a new section of ring road is needed taking A41 to the south of Graven Hill, so that this whole area can be successfully integrated into the urban area. Without this we consider the Plan would not be positively prepared as it would lack an important infrastructure requirement.</p> <p>We note from the Housing Trajectory table on Page 155 that the intention is to complete the whole development before 2031. However, we would note the Council's intention that a substantial part of this development is to be a self-build scheme for individuals or groups of people to build their own homes. It is suggested that more than 1000 such homes could be envisaged.</p> <p>We support the principle, but would point out that such development is likely to proceed at a much slower pace than conventional estate development by volume builders. This raises some doubt as to whether the expected rate of development will be achieved. Thus the Plan could prove ineffective in this respect.</p>	<p>We consider a new section of ring road is needed taking the A41 to the south of Graven Hill, so that this whole area (including SE Bicester) can be successfully integrated with the urban area. And this will help to ensure that the Plan is more sound in respect of highway infrastructure.</p>			

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167/07	Colin	Cockshaw	Bicester Against Eco-Con (BAECon)	Main	74	We support this allocation in principle, but continue to be concerned that there is a need for more comprehensive highway improvements for this part of the town as it develops. The A41 is a major cross-country highway which severs the site from the town and improved access and underpasses are an inadequate response, particularly bearing in mind the additional development now proposed at SE Bicester. We consider a new section of ring road is needed taking A41 to the south of Graven Hill, so that this whole area can be successfully integrated into the urban area. Without this we consider the Plan would not be positively prepared as it would lack an important infrastructure requirement. We note from the Housing Trajectory table on Page 155 that the intention is to complete the whole development before 2031. However, we would note the Council's intention that a substantial part of this development is to be a self-build scheme for individuals or groups of people to build their own homes. It is suggested that more than 1000 such homes could be envisaged. We support the principle, but would point out that such development is likely to proceed at a much slower pace than conventional estate development by volume builders. This raises some doubt as to whether the expected rate of development will be achieved. Thus the Plan could prove ineffective in this respect.	We consider a new section of ring road is needed taking the A41 to the south of Graven Hill, so that this whole area (including SE Bicester) can be successfully integrated with the urban area. And this will help to ensure that the Plan is more sound in respect of highway infrastructure.			
049/1	Angela	Jones	Ambrosden Parish Council	Main	74					Strongly support development of additional dwellings on the site. Highway improvements should include the A41 and enhance cycle paths.
097/10	Sue	Mackrell	Bicester Town Council	Main	74	The creation of an Eastern perimeter road around Graven Hill is essential to ensure the smooth movement of traffic around the town. The preferred option is to locate the road to the South East.				
161/3	Martin	Small	English Heritage	Main	74		key site specific design and place shaping principle to read "Development proposals to be accompanied and influenced by a landscape and visual impact assessment and a heritage impact assessment".			English Heritage welcomes the addition of a requirement to Policy Bicester 2 that development proposals should be accompanied by a heritage assessment, although we would prefer this key site specific design and place shaping principle to read "Development proposals to be accompanied and influenced by a landscape and visual impact assessment and a heritage impact assessment".
175/2	Mike	Pollard	Banbury Ornithological Society	Main	74		Add: Provision of buffer between new development and the sewage works and the nature reserve. Add: Buffer to be designed to create a natural greenspace coherent with the adjoining nature reserve, preferably including wetland habitats.	We support the biodiversity protection and enhancement measures. We support the provision of a buffer between the new development and the sewage works.		Generally comfortable with this policy but it needs to take account to the adjoining nature reserve managed by BOS. The buffer policy needs a little more detail to ensure it is effective in delivering a net gain in biodiversity.
196/4	Steven	Sensecall	Kemp & Kemp LLP / Leda Properties	Main	74			The proposed additional text is supported. Inclusion of the Langford Park Farm site into the wider Graven Hill allocation will facilitate integration and promote safe and more sustainable pedestrian and cycle links with the wider community, Town Centre and railway station.		Integration and linkages between Graven Hill and the town is a key sustainable design consideration. The Cherwell Local Plan Sustainability Appraisal Addendum for Main Modifications recognises the benefits for including Langford Park Farm into the wider Graven Hill allocation. This is also supported by the Bicester Landscape Sensitivity and Capacity Assessment Addendum, the Flood Risk Technical Note and the Transport Technical Note. Langford Park Farm is available for development immediately and is in a sustainable location which will provide connectivity between the rest of the Graven Hill allocation and the services and facilities at Bicester including public transport, employment and retail.
212/4	Les	Sibley	Local/County Councillors	Main	74			Agree with the employment use classes B1, B2 and B8 for this site and would recommend the addition of the line "primary B8 uses" as it is an ideal location for warehousing and distribution due to the excellent built in infrastructure of the area and the close proximity to the railway and motorway links.		

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254/3	Mark	Mathews	Thames Water	Main	74					Thames Water has no comments to make on the main modifications or IDP text. The supply and wastewater networks are unlikely to be able to support the demand anticipated from Graven Hill. Infrastructure is likely to be required. Water supply and drainage strategies would be required from the developer. If upgrading is required there could be a delay of up to 3 years for delivery unless the developer requisitions the infrastructure.
300/3	Penny	Silverwood	Berks, Bucks and Oxon Wildlife Trust (BBOWT)	Main	74		The last bullet point under Key specific design and place shaping principles is missing the word " <u>granted</u> " at the end.			It is not clear whether preliminary ecological surveys have been carried out to inform the proposed extension to this allocated site. Minor amendment needed.
301/39	Bev	Hindle	Oxfordshire County Council	Main	74					Modification 74 - Bicester 2, Graven Hill. The extension of this allocation site includes an area of archaeological potential. A programme of archaeological investigation and field evaluation will be required to be undertaken before the determination of any planning application for this extended area. It is suggested that wording should be included in the Key Specific design and Place Shaping Principles part of Policy Bicester 2. Suggested wording is set out in the Table of Detailed Comments.
301/67	Bev	Hindle	Oxfordshire County Council	Main	74	Policy Bicester 2 – Graven Hill Ecology - The site is ecologically sensitive. Public transport - The development should provide funding for bus services and associated bus stop infrastructure to ensure the site is connected by public transport. It should also provide turning areas for buses, if required by the constraints of the masterplan.	The District Council should seek the advice of their ecologist to assess whether the extended site area would have any additional impacts on biodiversity. Amend wording of the Key site specific design and place shaping principles, as follows: "Contribution to improvements to the surrounding local and strategic road networks, good accessibility to and improvement of public transport services <u>including financial or in-kind contributions to bus services and bus stop infrastructure</u> , engineered pedestrian and cyclist connectivity to the A41 underpass to facilitate potential routes to the town centre, improved facilities for pedestrians and cyclists to cross the A41, and the provision of a Travel Plan to maximise connectivity with existing development".			
301/68	Bev	Hindle	Oxfordshire County Council	Main	74	Archaeology - The extension of this allocation site includes an area of archaeological potential. A programme of archaeological investigation and field evaluation will be required to be undertaken before the determination of any planning application for this extended area.	Add wording to the Key site specific design and place shaping principles, as follows: " <u>An archaeological field evaluation to assess the impact of the development on archaeological features</u> ".			
166/58	Helen	Marshall	CPRE Oxfordshire	Main	76	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			
225/3	Lorna and Ian	James		Main	76					Objects to an additional 76 dwellings proposed at South West Bicester phase 2 as it will increase densities and it will lead to a loss of green space. The Council should aspire to pleasant residential environments.
225/4	Lorna and Ian	James		Main	76					The proposed changes will result in more development close to Bignell Park and Bignell woods which is home to wildlife. As much green space as possible should be retained.
231/1	Adrian	Barker	JPPC / The Tripartite (Oxford University, Merton College and R.Smith)	Main	76					Support Policy Bicester 3

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231/1	Adrian	Barker	Terence O'Rourke / Countryside Properties	Main	76		The provision of extra care housing and the opportunity for community self-build affordable housing <u>which should contribute towards meeting affordable housing requirements.</u>			Countryside can facilitate the delivery of self build projects but cannot ensure their delivery. If these requirements are in the policy then they should contribute towards the affordable housing requirement to ensure viability of the development. The Policy wording should be amended, clarifying the different types of housing required.
231/1	Adrian	Barker	Terence O'Rourke / Countryside Properties	Main	76		The policy should be amended to reflect the current position. Community facilities - local centre , <u>convenience store</u> and community or contributions towards the enhancement of community facilities as part of phase 1			Phase 2 of South West Bicester should contribute towards enhanced facilities at Phase 1. An enhanced community facility should be provided at Phase 1 to accommodate demands from phase 1 and 2. Countryside has committed to enhancing the community centre at phase 1 as part of an outline application for phase 2. The Policy should be amended to reflect this.
231/10	Adrian	Barker	Terence O'Rourke / Countryside Properties	Main	76		Item 21a Improvements to Middleton Stoney Road Roundabout western end: Shakespeare Drive and Howes Lane roundabouts.			The headline of item 21a is potentially misleading and not effective as it refers to the Middleton Stoney Road link and not the roundabout.
231/11	Adrian	Barker	Terence O'Rourke / Countryside Properties	Main	76		Remove reference to Bicester 3 - South West in the LP Site Policy column of the table under item 26f.			Item 26f refers to improved Bicester pedestrian and cycle links through the implementation of a southern connectivity project which is not considered related to proposals at south west Bicester.
231/12	Adrian	Barker	Terence O'Rourke / Countryside Properties	Main	76					Supports some of the changes made to Policies ESD1 to 5.
231/13	Adrian	Barker	Terence O'Rourke / Countryside Properties	Main	76		Insert the following: <u>New housing developments can secure sufficient climate change mitigation measures by constructing to the level of the building regulations.</u>			Considers Policy ESD1 to be unsound.
231/14	Adrian	Barker	Terence O'Rourke / Countryside Properties	Main	76		The requirement for an energy statement should be deleted and Policy ESD2 should be amended to apply only to non-residential development as a result of the Housing Standards Review.			Considers Policy ESD2 to be unsound
231/15	Adrian	Barker	Terence O'Rourke / Countryside Properties	Main	76		The requirement for new residential development to achieve zero carbon status should be deleted and replaced with the following text: <u>All new residential development will secure carbon emission reductions by implementing the building regulations.</u> The policy test requiring strategic site allocations to secure exemplar contributions to carbon emission reductions should be deleted.			Considers Policy ESD3 to be unsound
231/16	Adrian	Barker	Terence O'Rourke / Countryside Properties	Main	76		The requirement for a feasibility study for DH/CHP within residential development should be deleted from the policy.			Considers Policy ESD4 to be unsound. District Heating or Combined Heat and Power is unfeasible for any low density led development.
231/17	Adrian	Barker	Terence O'Rourke / Countryside Properties	Main	76		This requirement should be deleted.			Policy ESD5 is unsound. The HSR has concluded that the building regulations are the only metric that can be used by the Local Authorities to reduce carbon emissions and the request for a feasibility study is an unnecessary cost. The Council have not submitted any additional evidence to demonstrate the additional impact of this policy .
231/2	Adrian	Barker	Terence O'Rourke / Countryside	Main	76					Only a small local centre could be supported at phase 2 as the population is only expected to be 1,610 people.
231/3	Adrian	Barker	Terence O'Rourke / Countryside Properties	Main	76		Access and movement - link to Phase 1 shuttle bus service to Bicester Town Railway Station and Park and Ride at Phase 1. Contributions, as required and justified, towards a possible extension to the existing local (shuttle) bus service from Phase 1 into phase 2 or other bus service as considered appropriate.			Countryside has had discussions with the County Council and it has been agreed the phase1 bus service will be extended to cover phase 2. The Local Plan should not prescribe a route or suggest that the service can only be delivered as a stand alone shuttle service.

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231/4	Adrian	Barker	Terence O'Rourke / Countryside Properties	Main	76		Good accessibility to public transport services should be provided by ensuring that the bus routes and bus stops within the site are accessible by pedestrians and cyclists with effective footpaths and cycle routes to bus stops including the provision of a bus route through the site with buses stopping at the railway stations and new bus stops on the site.			The wording for regarding footpaths and cycle links should be improved.
231/5	Adrian	Barker	Terence O'Rourke / Countryside Properties	Main	76					Countryside objects to the requirement for the development to provide 'opportunities for green infrastructure links beyond the development site to the wider town and open countryside as the wording is imprecise and therefore raises uncertainty over what it actually requires.
231/6	Adrian	Barker	Terence O'Rourke / Countryside Properties	Main	76		Provision of opportunities for Green Infrastructure links beyond the development site to the wider town and open countryside. Assist in facilitating a community woodland/green buffer to be provided between Chesterton village and the development area (Policy ESD15 Green Boundaries to Growth) <u>where directly related to the impact of the phase 2 development</u>			Countryside does not believe it is appropriate or justified for the establishment of the community woodland to fall under its responsibility and it should be the responsibility of the Council to deliver it. A contribution by Countryside should be reasonably related and proportional to the likely impacts of the development and should only therefore be sought as a contribution.
231/7	Adrian	Barker	Terence O'Rourke / Countryside Properties	Main	76		Development proposals should seek to protect cultural heritage and archaeology, including the conversion of any important farm buildings where possible especially in regard to the conversion of Whitelands farm and associated buildings, located to the southwest of the allocation.			Whitelands farm is the subject of a separate application and is not listed. The current policy requirement is not sound and justified.
231/8	Adrian	Barker	Terence O'Rourke / Countryside Properties	Main	76		Add 'Ensuring delivery of high quality public transport from all strategic sites to Bicester town centre and rail stations. Serve all strategic sites by bus premium route standards, where appropriate.			The IDP identifies a requirement for the provision of premium route standards which would not be appropriate at phase 2 as the scale of development does not justify the level of frequency required.
231/9	Adrian	Barker	Terence O'Rourke / Countryside Properties	Main	76		Remove reference to Bicester 3 - South West in the LP Site Policy column of the table under item 12a.			The provision of a bus stop on the A41 adjacent to Bicester Business Park is not related to SW Bicester.
254/8	Mark	Mathews	Thames Water	Main	76					Thames Water has no comments to make on the main modifications or IDP text. It does not envisage infrastructure concerns regarding Water Supply capability at SouthWest Bicester Phase 2. The wastewater networks are unlikely to be able to support the demand anticipated from the site. Drainage infrastructure is likely to be required. A drainage strategy would be required from the developer. If upgrading is required there could be a delay of up to 3 years for delivery unless the developer requisitions the infrastructure.
061/24	Alan	Lodwick		Main	76	Objects to the use of the SHMA figures to inform the Local Plan.	All Modifications relating to the SHMA should be deleted.			
161/1	Martin	Small	English Heritage	Main	77		key site specific design and place shaping principle to read "Development proposals to be accompanied and influenced by a landscape and visual impact assessment and a heritage impact assessment".			English Heritage welcomes the addition of a requirement to Policy Bicester 4 that development proposals should be accompanied by a heritage assessment,
097/11	Sue	Mackrell	Bicester Town Council	Main	78	Concern regarding connectivity from and to Bicester Town Centre, particularly the London Road access which is to be severely compromised by Network Rail developments and their impact on the level crossing. An alternative route needs to be agreed and provided at an earliest opportunity. Support improvements to Market Square, however, need to ensure no development takes place until connectivity to and from the Town Centre, including the London Road level crossing issue, has been resolved. Cycle and pedestrian routes need to be fully integrated offering users the opportunity to access all parts of the town easily and safely.				

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304/3	Chris	Goddard	DP9 Ltd / Value Retail (Bicester Village Ltd)	Main	78	Objects to the proposed wording "conditions will be attached to planning permissions if necessary" as the requirement for planning conditions should be determined at the application stage, having regard to relevant policy tests at the time. Welcome the inclusion of BV into the "Area of Search" however disappointed that the expansion of the Bicester town centre boundary has not been pursued, instead deferring the decision to the preparation of the Local Plan Part 2. The current proposed "Area of Search" is a significant missed opportunity to extend Bicester town centre.	Paragraph C.68 should be deleted and replaced with: " <u>Planning permission has recently been granted for an extension to Bicester Village. Consistent with the extension of the Town Centre Boundary to include Bicester Village as a specialist retail quarter, further development of Bicester Village will be supported, provided it is complementary to and effectively linked to the traditional town centre.</u> "			The Council has sufficient evidence base to progress the town centre boundary extension at this stage of the Local plan. CBRE's Retail study (2012) and WYG Masterplan (2012) and recent planning permissions supports this.
167/03	Colin	Cockshaw	Bicester Against Eco-Con (BAECon)	Main	78	The huge amount of retail development at Bicester Village (BV) is totally out of scale with the needs of the area. The Council argues that it is 'complementary' to the town centre, but in fact it detracts from the town centre, not just by taking trade away, but by depressing the shopping offer in the town centre as it appears that 'better quality' retailers are reluctant to consider the town centre. In consequence Bicester town centre has hardly any 'better quality' High Street retailers, no department store and is characterised by the cheaper end of the retail industry, with a high proportion of charity shops, difficulty in letting newly built units and a recent tendency for change of use of these new A1 retail units to A2 or other uses. As the town centre and BV are separate entities and some distance apart it is not clear how BV could have a role in further redevelopment which could benefit the town centre. The reverse is more likely. The Council suggests that visitors to BV will benefit the town centre by bringing in additional trade, but in practice very few visit the town centre, except to catch a bus, walk through on their way back to the railway station, or because they are lost! On the other hand BV attracts huge volumes of traffic every day This causes major traffic problems at key times in the southern part of the town which impedes town centre traffic. The Council do not offer evidence to support their views, so it is considered that these policy statements are not justified. Any further expansion of Bicester Village should be resisted unless it can be shown that these problems will no longer apply.	Delete modifications 23 and 78 and substitute new policy statements aimed at containing growth of Bicester Village unless and until measures are in place to counter adverse effects on the town centre noted above and either control traffic or redirect traffic away from the present main entrance to the site.			
166/59	Helen	Marshall	CPRE Oxfordshire	Main	79	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			
304/4	Chris	Goddard	DP9 Ltd / Value Retail (Bicester Village Ltd)	Main	79	Objects to the proposed wording "conditions will be attached to planning permissions if necessary" as the requirement for planning conditions should be determined at the application stage, having regard to relevant policy tests at the time. Welcome the inclusion of BV into the "Area of Search" however disappointed that the expansion of the Bicester town centre boundary has not been pursued, instead deferring the decision to the preparation of the Local Plan Part 2. The current proposed "Area of Search" is a significant missed opportunity to extend Bicester town centre.	The third and fourth paragraphs of Policy Bicester 5 should be deleted and replaced with: " <u>The Council has reviewed the Town Centre Boundary, based on the findings of the 2010 Retail Study and the Bicester Masterplan (2012), which identify the need to expand the town centre boundary to accommodate Bicester's growth needs and improve connectivity between the existing town centre, Bicester Town Railway Station, the extended Bicester Village and existing and potential open space. Retail and other main town centre uses and, in appropriate locations, residential development will be supported within the extended town centre, where they help to deliver the aims for central Bicester set out above.</u> "			The Council has sufficient evidence base to progress the town centre boundary extension at this stage of the Local plan. CBRE's Retail study (2012) and WYG Masterplan (2012) and recent planning permissions supports this.
061/25	Alan	Lodwick		Main	79	Objects to the use of the SHMA figures to inform the Local Plan.	All Modifications relating to the SHMA should be deleted.			
248/1	Richard	Cutler	Bloombridge	Minor	82	The amended wording should go further than simply removing the word "specifically". The policy does not adequately provide for the mix of uses that are essential to 'second generation' business parks: ie those not solely employment uses but include a range of amenities for employees. This mix of uses provides for a more attractive business environment, creating a faster take up of space and ensuring much higher levels of sustainability.	We request that the policy should be amended to read as follows: • Use Classes – B1 Business Uses, focusing on high tech knowledge industries, with appropriate ancillary amenity uses, including a hotel.	The case for mixed use business parks is universally accepted as sound planning.	No changes to the Sustainability Appraisal are required in order to effect the change we have requested.	

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301/69	Bev	Hindle	Oxfordshire County Council	Main	82	Policy Bicester 10 Bicester Gateway One of the two line options being considered for a new south-east link road would be routed through this development site. As this could be a crucial piece of infrastructure to enable the planned growth in the town, the county council would not want to lose one of the route options. The county council needs the policy wording to keep these options open and work with the developer to safeguard a corridor until the preferred route has been confirmed.	Under Access and Movement, include: "Safeguarding of land for future highway capacity improvements to peripheral routes in consultation with the Highways Authority".			
300/4	Penny	Silverwood	Berks, Bucks and Oxon Wildlife Trust (BBOWT)	Main	83					Supports the amended bullet point 22. It is not clear whether preliminary ecological surveys have been carried out to inform the proposed extension to this allocated site. Consideration should be given to the potential for cumulative impacts on Bicester Wetlands Reserve and Local Wildlife Sites, and there are protected species recorded onsite.
161/4	Martin	Small	English Heritage	Main	84		key site specific design and place shaping principle to read "Development proposals to be accompanied and influenced by a landscape and visual impact assessment and a heritage impact assessment".			English Heritage welcomes the addition of a requirement to Policy Bicester 10 that development proposals should be accompanied by a heritage assessment. English Heritage also welcomes the addition at the Submission stage of a new principle: "Conservation and enhancement of Alchester Roman Town Scheduled Ancient Monument and the setting out of opportunities to better reveal its significance").
175/3	Mike	Pollard	Banbury Ornithological Society	Main	84	The area of proposed development has increased significantly. No provision has been made to buffer the adjacent nature reserve from the development. The adjacent nature reserve is a priority BAB habitat.	We propose that the following policy text is added: Create a natural wetland buffer between the development and adjacent nature reserve along the eastern boundary. Buffer to be an average of 200m along the boundary. This is to mitigate for the impact of development on the nature reserve and ensure a net gain in biodiversity following the development of green field land for employment.			
175/4	Mike	Pollard	Banbury Ornithological Society	Main	84		To ensure the protection of existing BAP habitat and deliver a net gain in biodiversity, the creation of BAP priority habitat should be carried out across the whole of the CTA. In the Ray CTA, the key BAP priority habitat is Lowland Meadow. This will also contribute to the accessible nature greenspace requirement.			The development site includes area of Lowland Meadows BAP priority habitat and a very substantial area lies within the Ray Conservation Target Area. Development of green field land on this scale, impacting on sites of known ecological value will lead to a net loss of biodiversity unless effective measures are put in place. In this case we do not think the measures prescribed will be effective as there is no requirement to create BAP habitat.
301/70	Bev	Hindle	Oxfordshire County Council	Main	84	Policy Bicester 11 – North East Bicester Park Public transport - The development should provide a walking route from commercial buildings to bus stops on the A41, including a safe means of pedestrians crossing the A41. To keep walking distances to 500m, new bus stops may be required on the A41, to be funded by the developer. The nearest bus stop could be the proposed Park and Ride site. Ecology - There are protected species on the site. The District Council should ensure that they have assessed the biodiversity value of the habitat. The District Council should also assess potential cumulative impacts of this site on the Bicester Wetlands Reserve and Local Wildlife Sites.	Amend the wording in the Key site specific design and place shaping principles section as follows: "Good accessibility to public transport services should be provided for including <u>the provision of bus stop(s) on the A4421, and connecting pedestrian access to bus stops from commercial buildings</u> " Amend the wording in the Key site specific design and place shaping principles section as follows: "The site lies adjacent to a designated Local Wildlife Site and a proposed Local Wildlife Site. Ecological surveys must be undertaken to identify habitats and species of value and any mitigation measures required, <u>including those required to mitigate cumulative impacts on the Bicester Wetlands Reserve and Local Wildlife Sites</u> ".			
210/3	Adrian	Gould	JPPC / Bicester Heritage Ltd	Main	85	It is considered that the increased allocation of employment land at North East Bicester has not been justified in that due regard has not been given to the potential to allocate a proportion of the additional employment land to the former RAF Bicester, where land for such purposes is both suitable and available.	The Technical Site and Flying Field should be allocated as a strategic employment site which is suitable for meeting some of the increased demand for B1 and B8 purposes that has been identified for this area of Bicester.		No comment	

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212/2	Les	Sibley	Local/County Councillors	Main	85	Objection raised to the introduction of employment class B8 (warehouses and distribution) on this site as it is not in keeping with the historical nature on nearby RAF Bicester conservation area. Bullet point 14 under Key site specific design and place shaping principles could not be achieved with a number of large B8 warehouses. This also applies to bullet point 10 where large B8 warehouses would only destroy any flora or fauna in the area.	Re-instate B1 Office use only. The site area could be reduced therefore more in keeping with the current open nature of this productive farming area as long as only low level B1 offices were constructed.			
222/1	Hannah	Smith	Quod / Albion Land	Main	85					Support is provided for the changes to allow for mixed use B use classes.
167/08	Colin	Cockshaw	Bicester Against Eco-Con (BAECon)	Main	85	We consider the increased provision at Upper Heyford to be appropriate. We recognise that there are constraints which will limit the extent to which the former air base can be developed, but despite its rural location, it is well located to both motorway connections and railway stations and also well-located in relation to Bicester and other urban centres further afield. Moreover it is largely previously developed land. We support the development of this site to its maximum potential – if possible providing more housing than that proposed in the plan modification.	This is a particularly ill-judged proposal for use of greenfield land in a very open and sensitive location, beyond the limits of the urban area, adjoining the airfield Conservation Area. It is acknowledged that development (an old people's home) is already taking place here (another ill-judged decision by the Council) but this is no justification for this large scale intrusion of development for employment purposes in this particular situation. The site is not physically or visually related to existing employment areas or to the residential area to the south. It does relate visually to the airfield and so helps to protect and enhance the character of the Conservation Area. It should be retained for this reason and because of its open aspect and excellent well-used access via rights of way into the surrounding countryside.			
167/08	Colin	Cockshaw	Bicester Against Eco-Con (BAECon)	Main	86	We consider the increased provision at Upper Heyford to be appropriate. We recognise that there are constraints which will limit the extent to which the former air base can be developed, but despite its rural location, it is well located to both motorway connections and railway stations and also well-located in relation to Bicester and other urban centres further afield. Moreover it is largely previously developed land. We support the development of this site to its maximum potential – if possible providing more housing than that proposed in the plan modification.	This is a particularly ill-judged proposal for use of greenfield land in a very open and sensitive location, beyond the limits of the urban area, adjoining the airfield Conservation Area. It is acknowledged that development (an old people's home) is already taking place here (another ill-judged decision by the Council) but this is no justification for this large scale intrusion of development for employment purposes in this particular situation. The site is not physically or visually related to existing employment areas or to the residential area to the south. It does relate visually to the airfield and so helps to protect and enhance the character of the Conservation Area. It should be retained for this reason and because of its open aspect and excellent well-used access via rights of way into the surrounding countryside.			
222/2	Hannah	Smith	Quod / Albion Land	Main	86					Support is provided for the removal a 'business park'
222/3	Hannah	Smith	Quod / Albion Land	Main	86		The site should be extended further to the north east and should not include land to the south east allocated by the Council which is undeliverable.			The Council agreed at the examination to extend the boundary of Bicester 11 as shown in the Submission Local Plan January 2014 and broaden the range of uses to include all B uses. The uses permitted have been changed but the site has not been changed as suggested by the promoter, which was discussed at a meeting with the Council in June. The Council's proposed extension involves identifying land which is in the flood plain and in a proposed local wildlife site. The land identified by Albion land to the south east extends up to the boundary of flood zone 3a ensuring the land is developable and viable. The land to the north east proposed by Albion land to the north east runs along the boundary of the scheduled ancient monument and part falls within the RAF Bicester conservation area. Extending the allocation in the manner sought by Albion land will not cause any due environmental harm.

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167/08	Colin	Cockshaw	Bicester Against Eco-Con (BAECon)	Main	87	We consider the increased provision at Upper Heyford to be appropriate. We recognise that there are constraints which will limit the extent to which the former air base can be developed, but despite its rural location, it is well located to both motorway connections and railway stations and also well-located in relation to Bicester and other urban centres further afield. Moreover it is largely previously developed land. We support the development of this site to its maximum potential – if possible providing more housing than that proposed in the plan modification.	This is a particularly ill-judged proposal for use of greenfield land in a very open and sensitive location, beyond the limits of the urban area, adjoining the airfield Conservation Area. It is acknowledged that development (an old people's home) is already taking place here (another ill-judged decision by the Council) but this is no justification for this large scale intrusion of development for employment purposes in this particular situation. The site is not physically or visually related to existing employment areas or to the residential area to the south. It does relate visually to the airfield and so helps to protect and enhance the character of the Conservation Area. It should be retained for this reason and because of its open aspect and excellent well-used access via rights of way into the surrounding countryside.			
116/1	Jack	Moeran	Environment Agency	Main	87	The proposed site boundary now includes significant areas at medium (Flood Zone 2) and high (Flood Zone 3) flood risk, as well as having a section of the Langford Brook (Main River) to the South East of the site. Wording on Policy Bicester 11 needs to be amended to reflect the increase in flood risk that is associated with the site. Recommend changes to the text to reflect the Flood Risk associated with the expanded site boundary. This wording will ensure that there is no 'less vulnerable' development located in the Functional Flood Plain (Flood Zone 3b) which is in line with the requirements of the NPPF. Due to the flood risk associated with the site reference should be made to Policy ESD 6 (Sustainable Flood Risk Management) so that the development is delivered in the most sustainable way and built development is located in areas at the lowest risk of flooding.	New bullet needed under Key Site Specific Design and Place Shaping Principles to read: " <u>No built development will be located in Flood Zone 3b and the principles set out in Policy ESD 6: Sustainable Flood Risk Management will be followed.</u> "		No comment	
161/5	Martin	Small	English Heritage	Main	87					English Heritage welcomes and supports the addition to Policy Bicester 11 of new key site specific design and place shaping principles: "Development proposals to be accompanied by a landscape and visual impact assessment together with a heritage assessment", "Conserve or enhance the setting of the RAF Bicester Conservation Area and adjoining Scheduled Ancient Monument" and "Preparation of an archaeological and cultural heritage assessment to inform development proposals".
163/2	John	Broad		Main	87		Under 'Employment' bullet point 3 used to say "B1 Office/Business uses only (due to the impact on the Former RAF Bicester Conservation Area)"; this needs to be reinstated as the conservation and heritage site of historic RAF Bicester has not changed. B8 should be removed from Bicester 11.		Sustainability Appraisal concludes in paragraph 1.100, page 28, that Bicester 11 "could have a significant negative effect on SA objective 11 (landscape & heritage) as they are within close proximity of heritage features that could also be affected by development". What is the point of employing these consultants if CDC ignores their important findings	The proposed expansion of this site across productive farmland, in full view of the historic RAF Bicester heritage site, adjacent to a Local Wildlife Site and adjoining Scheduled Ancient Monument cannot be allowed to occur. There is no way that this proposed extensive industrial site could ever conserve the open setting, character and appearance of former RAF Bicester Conservation Area. Warehousing and distribution is totally the wrong type of structure in this location and should be deleted from Bicester 11. English Heritage identified the RAF Bicester site as important for the "views across the open countryside from the control tower". NPPF Paragraph 133 requires LPAs to refuse consent where a proposed development will lead to substantial harm to heritage asset. Bullet point 10 "Key site specific design and place shaping principles", identifies a designated Wildlife Site adjacent to the site. Industry and wildlife do not go together in close proximity.
210/4	Adrian	Gould	JPPC / Bicester Heritage Ltd	Main	87	It is considered that the increased allocation of employment land at North East Bicester has not been justified in that due regard has not been given to the potential to allocate a proportion of the additional employment land to the former RAF Bicester, where land for such purposes is both suitable and available.	The Technical Site and Flying Field should be allocated as a strategic employment site which is suitable for meeting some of the increased demand for B1 and B8 purposes that has been identified for this area of Bicester.		No comment	

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222/4	Hannah	Smith	Quod / Albion Land	Main	87		<p>Delete existing text and amend policy for the site to read:- Policy Bicester 11 – Employment land at North East Bicester Development Area: 15-12.5 hectares Development Description: Employment development</p> <p>Employment Jobs created – approx. 1,000. Site constraints may reduce numbers slightly. Use classes – B1, B2 and B8 uses Infrastructure Needs Open space – structured open spaces and planting that provide a strong landscape setting, support SUDs and improvement to the microclimate.....</p>			<p>The Council has also added 'key site specific design and place shaping principles' which are unnecessary, unjustifiable and impractical. Reference to policy ESD16 is unnecessary and should be removed.</p> <p>The Council's modifications to bullet point 5 are burdensome and inflexible and do not pay appropriate regard to the potential to divert public rights of way. The requirement to improve linkages to the Bicester's wider urban area is far reaching and imprecise and no justification is provided. The requirement to locate B1 a development surrounding the care home is unnecessary and overburdening. The office market is limited in this location. The requirement under bullet point 7 to consult with the local Highways authority regarding improvements to Skimmingdish lane is unnecessary.....</p>
222/4	Hannah	Smith	Quod / Albion Land	Main	87		<p>Cont.....Key site specific design and place shaping principles Proposals should comply with Policy ESD16 Layout of development that enables a high degree of integration and connectivity between new and existing development, including adjoining employment areas, nearby residential areas and the town centre. Good accessibility to public transport services should be provided including providing bus stops for the site. Provision of new footpaths and cycleway to connect with the existing footpath/cycleway links around the site including along Skimmingdish Lane, to Launton Road and to services and facilities in Bicester's wider urban area.</p>			<p>Cont.....Specific reference to the need to preserve, retain and enhance existing mature hedgerows and important trees within bullet 10 is overburdening. The requirement to produce a cultural heritage and archaeological assessment is duplication of the requirement in bullet 12 is therefore unnecessary. The equipment for public art is covered by policy BSC11 and therefore is not required in bullet 17 and therefore should be deleted. The requirement to take account of the Council's flood risk assessment at bullet 19 is duplication of bullet 20 and is therefore unnecessary. The requirement for the incorporation of Suds is covered by policy ESD7 of the Local Plan and does not require restating. The added requirement for exemplary demonstration of compliance with the requirements of policies ESD1 to 5 is burdensome and fails to take account of the need for flexibility within planning policies and could undermine the viability and deliverability of development. The requirement for an assessment of its agricultural and soil value is entirely unnecessary and should be removed.</p>
222/5	Hannah	Smith	Quod / Albion Land	Main	87		<p>Retention and enhancement of existing Public Rights of Way, where appropriate. Diversions of public rights of way will be considered having regard to their potential impacts on rights of access. and the provision of links from the development and Bicester's urban area to the wider Public Rights of Way network A green buffer with planting immediately adjacent to the Care Home and beyond this, B1a development to surround the Care home in order to protect residential amenity. A detailed Transport Assessment to be undertaken and Travel Plan to be provided focusing on maximising access by means other than the private car including demonstration of the provision of adequate cycle parking. Consultation with the Local Highways Authority regarding potential future improvements to Skimmingdish Lane and any design implications for the development frontage.</p>			<p>The Council has also added 'key site specific design and place shaping principles' which are unnecessary, unjustifiable and impractical. Reference to policy ESD16 is unnecessary and should be removed.</p> <p>The Council's modifications to bullet point 5 are burdensome and inflexible and do not pay appropriate regard to the potential to divert public rights of way. The requirement to improve linkages to the Bicester's wider urban area is far reaching and imprecise and no justification is provided. The requirement to locate B1 a development surrounding the care home is unnecessary and overburdening. The office market is limited in this location. The requirement under bullet point 7 to consult with the local Highways authority regarding improvements to Skimmingdish lane is unnecessary. Specific reference to the need to preserve, retain and enhance existing mature hedgerows and important trees within bullet 10 is overburdening.....</p>

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222/5	Hannah	Smith	Quod / Albion Land	Main	87		<p>Cont.....A high quality, well designed approach to the urban edge which functions as a high profile economic attractor but which also achieves a successful transition between town and country environments.</p> <p>Buildings that provide for an active frontage to Skimmingdish Lane and a strong gateway at the site entrance.</p>			<p>Cont.....The requirement to produce a cultural heritage and archaeological assessment is duplication of the requirement in bullet 12 is therefore unnecessary.</p> <p>The equipment for public art is covered by policy BSC11 and therefore is not required in bullet 17 and therefore should be deleted.</p> <p>The requirement to take account of the Council's flood risk assessment at bullet 19 is duplication of bullet 20 and is therefore unnecessary. The requirement for the incorporation of Suds is covered by policy ESD7 of the Local Plan and does not require restating.</p> <p>The added requirement for exemplary demonstration of compliance with the requirements of policies ESD1 to 5 is burdensome and fails to take account of the need for flexibility within planning policies and could undermine the viability and deliverability of development. The requirement for an assessment of its agricultural and soil value is entirely unnecessary and should be removed.</p>
222/6	Hannah	Smith	Quod / Albion Land	Main	87		<p>The site lies adjacent to a designated Local Wildlife Site and a proposed Local Wildlife Site.</p> <p>Ecological surveys must be undertaken to identify habitats and species of value and any mitigation measures required. Features of value, including existing mature hedgerows and important trees, should where possible and appropriate be preserved, retained and enhanced.</p> <p>Where removal of vegetation is necessary as part of development, appropriate mitigation or replacements should be provided to and the proposals should result in a net gain in biodiversity. Development that respects the landscape setting, and that demonstrates the enhancement, restoration or creation of wildlife corridors, and contributes towards creation of a green infrastructure network for Bicester.</p> <p>Development proposals to be accompanied by a landscape and visual impact assessment together with a heritage assessment.</p> <p>A comprehensive landscaping scheme to limit visual intrusion into the wider landscape, particularly given the need to conserve the open setting, character and appearance of the Former RAF Bicester Conservation Area.....</p>			<p>The Council has also added 'key site specific design and place shaping principles' which are unnecessary, unjustifiable and impractical.</p> <p>Reference to policy ESD16 is unnecessary and should be removed.</p> <p>The Council's modifications to bullet point 5 are burdensome and inflexible and do not pay appropriate regard to the potential to divert public rights of way. The requirement to improve linkages to the Bicester's wider urban area is far reaching and imprecise and no justification is provided.</p> <p>The requirement to locate B1 a development surrounding the care home is unnecessary and overburdening. The office market is limited in this location.</p> <p>The requirement under bullet point 7 to consult with the local Highways authority regarding improvements to Skimmingdish lane is unnecessary.</p> <p>Specific reference to the need to preserve, retain and enhance existing mature hedgerows and important trees within bullet 10 is overburdening.....</p>
222/6	Hannah	Smith	Quod / Albion Land	Main	87		<p>Cont.....</p> <p>Conserve or enhance the setting of the RAF Bicester Conservation Area and adjoining Scheduled Ancient Monument.</p> <p>Preparation of an archaeological and cultural heritage assessment to inform development proposals.</p>			<p>Cont.....The requirement to produce a cultural heritage and archaeological assessment is duplication of the requirement in bullet 12 is therefore unnecessary.</p> <p>The equipment for public art is covered by policy BSC11 and therefore is not required in bullet 17 and therefore should be deleted.</p> <p>The requirement to take account of the Council's flood risk assessment at bullet 19 is duplication of bullet 20 and is therefore unnecessary. The requirement for the incorporation of Suds is covered by policy ESD7 of the Local Plan and does not require restating.</p> <p>The added requirement for exemplary demonstration of compliance with the requirements of policies ESD1 to 5 is burdensome and fails to take account of the need for flexibility within planning policies and could undermine the viability and deliverability of development. The requirement for an assessment of its agricultural and soil value is entirely unnecessary and should be removed.</p>

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222/7	Hannah	Smith	Quod / Albion Land	Main	87		<p>A high quality design and finish, with careful consideration given to layout, architecture, materials and colourings and careful consideration given to building heights to reduce overall visual impact.</p> <p>The provision of public art to enhance the quality of the place, legibility and identity</p> <p>Adoption of a surface water management framework to maintain run off at Greenfield rates</p> <p>Take account of the Council's Strategic Flood Risk Assessment for the site</p> <p>A Flood Risk Assessment should be undertaken. In applying Policy ESD 7: Sustainable Drainage Systems (SuDS), detailed site analysis and ground investigation should be undertaken to establish if infiltration techniques are acceptable; it is likely that attenuation techniques will be more appropriate due to the underlying geological composition and groundwater vulnerability, taking account of the recommendations of the Council's Strategic Flood Risk Assessment and the Assessment for the site. Appropriate buffers should be provided alongside surface watercourses.</p> <p>A need for Demonstration of climate change mitigation and adaptation measures including exemplary demonstration of compliance with the requirements of policies ESD 1 – 5.....</p>			<p>The Council has also added 'key site specific design and place shaping principles' which are unnecessary, unjustifiable and impractical. Reference to policy ESD16 is unnecessary and should be removed.</p> <p>The Council's modifications to bullet point 5 are burdensome and inflexible and do not pay appropriate regard to the potential to divert public rights of way. The requirement to improve linkages to the Bicester's wider urban area is far reaching and imprecise and no justification is provided.</p> <p>The requirement to locate B1 a development surrounding the care home is unnecessary and overburdening. The office market is limited in this location.</p> <p>The requirement under bullet point 7 to consult with the local Highways authority regarding improvements to Skimmingdish lane is unnecessary.</p> <p>Specific reference to the need to preserve, retain and enhance existing mature hedgerows and important trees within bullet 10 is overburdening.....</p>
222/7	Hannah	Smith	Quod / Albion Land	Main	87		<p>Cont....An assessment of whether the site contains best and most versatile agricultural land, including a detailed survey where necessary.</p> <p>A soil management plan may be required to be submitted with planning applications.</p>			<p>Cont....The requirement to produce a cultural heritage and archaeological assessment is duplication of the requirement in bullet 12 is therefore unnecessary.</p> <p>The equipment for public art is covered by policy BSC11 and therefore is not required in bullet 17 and therefore should be deleted.</p> <p>The requirement to take account of the Council's flood risk assessment at bullet 19 is duplication of bullet 20 and is therefore unnecessary. The requirement for the incorporation of Suds is covered by policy ESD7 of the Local Plan and does not require restating.</p> <p>The added requirement for exemplary demonstration of compliance with the requirements of policies ESD1 to 5 is burdensome and fails to take account of the need for flexibility within planning policies and could undermine the viability and deliverability of development. The requirement for an assessment of its agricultural and soil value is entirely unnecessary and should be removed.</p>
300/5	Penny	Silverwood	Berks, Bucks and Oxon Wildlife Trust (BBOWT)	Main	87					<p>It is not clear whether preliminary ecological surveys have been carried out to inform the proposed extension to this allocated site.</p>
183	Daniella	Ayris		Main	88		<p>Request that Gavray Meadows have a new designation as a 'Local Green Space' as defined in the NPPF. Local Green Space status rules out new development other than in very special circumstances.</p>			<p>Objection raised to the increase in development area at South East Bicester (Policy Bicester 12). This will damage the wildlife in Gavray Meadows Wildlife Site by cutting off the wildlife corridor to the countryside. Plans for Gavray Drive and over the ring road to the SE will severely affect Gavray Meadows, Bicester's only wildlife site in the town and the River Ray Conservation Target Area.</p>
002/4	Gary	Bell		Main	88	<p>The 6th bullet point under Key site specific design and place shaping principles is a rather vague and there are no specific, measurable targets set down so that a future legal challenge on whether these has succeeded in being provided or not would be impossible to prove. These can't be considered as deliverables whilst there is so much vagueness. The term 'biodiversity' is too broad, 'net gain' is unclear and how it will be measured, when and by who is unknown. The Plan needs to be clear what landscaping includes as some green spaces do little to encourage extensive biodiversity therefore the Plan could potentially decrease biodiversity.</p>	<p>The Plan needs to set measurable targets, provide a definition of biodiversity and explain what the net gain is.</p>		<p>No comment</p>	

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049/2	Angela	Jones	Ambrosden Parish Council	Main	88					Logical place to increase development, but there should be highway improvements to the A41. A strategic green buffer to Ambrosden should be maintained.
059/2	Dominic	Woodfield	Bioscan UK Limited	Main	88		The proposals map should be amended to include within the remit of the Bicester 12 policy the eastern portion of the Gavray Drive Meadows LWS that currently sits outside the allocation boundary to the NW. The policy should then be amended to ensure that the future management and security of the LWS was delivered as part of the development package. The policy should also be amended to provide clarity on the amount of land take required for the various deliverables.			Proposed policy Bicester 12 seeks to secure a significant mixed used development on land partly covered by the River Ray Conservation Target Area, and east of the Gavray Drive Meadows Local Wildlife Site. It is debatable whether the policy can deliver a sustainable form of development. There is an absence of any evidence that a deliverability assessment has been carried out.
114/2	Jeffrey	Brindle		Main	88					Objection raised to the increase in development area at South East Bicester (Policy Bicester 12). This is a freefold expansion and the local population was not consulted in accordance with Planning Practice Guidance. Biodiversity will be affected by the proposal as the site has been extended right up to the London Railway line the wildlife corridor from the Local Wildlife Site Gavray 62W01 out to the River Ray Conservation Target Area which will be destroyed. This encroachment will lead to the decline and demise of wildlife. The character of the medieval footpaths has not been respected. It is not pleasurable to walk through a housing estate if a country walk was expected.
129/3	Linda	Ward		Main	88		Suggest that the area of land marked for development that overlaps the CTA on 5.2 Key Policies Map: Bicester, should be reduced in size so that the wildlife corridor over to Gavray Meadows Wildlife Site and the CTA in Bicester 13 is maintained.			The land area designated for development has increased from 40 to 155ha and is currently farmed i.e. it would be a greenfield site. This increase is nearly 4-fold compared with the previous submitted Local Plan. Buildings to accommodate employment are to be constructed for 3,000 people compared with 2,000 people in the previous Plan. In addition, housing numbers have increased from 400 to 1,500. The huge expansion of the planned development for this area will negatively affect two areas in the locality, namely Gavray Meadows Local Wildlife Site (Bicester 13) and the River Ray Conservation Target Area (Bicester 12 and 13). A large section of land in Bicester 12 is designated as part of the CTA. Development on or near this land will severely disrupt the important ecology of the CTA and reduce the capacity of land to support the variety of plants and animals that it currently sustains. Development will reduce the ability of the CTA to act as a wildlife corridor through into Bicester 13 which is adjacent to Bicester 12. Incompatible with both Policies ESD 10 and ESD 11.
161/6	Martin	Small	English Heritage	Main	88		key site specific design and place shaping principle to read "Development proposals to be accompanied and influenced by a landscape and visual impact assessment and a heritage impact assessment". The third (proposed to be fourth) key site specific design and place shaping principle should read: "Development proposals should protect cultural heritage and archaeology, in particular the grade II listed Wretchwick Farmhouse and Wretchwick Deserted Medieval Settlement, a Scheduled Ancient Monument, and incorporate an appropriate landscape buffer in consultation with English Heritage, to maintain the SAM's open setting. In consultation with English Heritage, appropriate public access and interpretation facilities should be provided".			The Key Policies Map and Inset Map for Bicester 12 show the area proposed for mixed use housing and employment as including the scheduled monument of Wretchwick Deserted Medieval Settlement. Development affecting its setting might, cause substantial harm to its significance. Paragraph 126 of the NPPF advises local authorities in their Local Plans to recognise heritage assets as an irreplaceable resource, and to conserve them in a manner appropriate to their significance. The Wretchwick Deserted Medieval Settlement is of national significance. English Heritage welcomes and supports the proposed addition to Policy Bicester 12 of a new key site specific design and place shaping principle requiring the development of a comprehensive masterplan for the allocated site in consultation with, inter alia, English Heritage. Support the addition of a requirement that development proposals should be accompanied by a heritage assessment.....

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161/6	Martin	Small	English Heritage	Main	88		<p>key site specific design and place shaping principle to read "Development proposals to be accompanied and influenced by a landscape and visual impact assessment and a heritage impact assessment".</p> <p>The third (proposed to be fourth) key site specific design and place shaping principle should read: "Development proposals should protect cultural heritage and archaeology, in particular the grade II listed Wretchwick Farmhouse and Wretchwick Deserted Medieval Settlement, a Scheduled Ancient Monument, and incorporate an appropriate landscape buffer in consultation with English Heritage, to maintain the SAM's open setting. In consultation with English Heritage, appropriate public access and interpretation facilities should be provided".</p>			<p>Cont.....English Heritage welcomes and supports the specific reference to consultation with English Heritage over an appropriate landscape buffer and appropriate public access and interpretation facilities. proposed to be fourth principle is too weak in its requirement: "Development proposals should seek to protect....." and is inconsistent with the protection afforded to nationally-important heritage assets by the National Planning Policy Framework.</p>
163/3	John	Broad		Main	88		B8 should be removed from Bicester 12.		<p>Bicester 12 identified as having a "significant negative effect" on the landscape, heritage & biodiversity and yet CDC still plan to destroy the area with unwarranted development!</p>	<p>The extension of this site from the original Local Plan of 40 hectares, located to the southern end, to the new 155 hectares now includes the River Ray Conservation Target Area (CTA). As this is impossible to allocate the land to two completely diverse and opposing uses, it is recommended that the River Ray Conservation Target Area be given preference. This would be supported by CDC Policy ESD10: protection and enhancement of biodiversity and the natural environment. This would be reinforced by the NPPF Core Planning Principle 7, "Contribute to conserving and enhancing the natural environment and reducing pollution". Under the heading "Infrastructure Needs", third bullet point (page 80), reference is made to "Safeguarding of land for future highway capacity improvements to peripheral routes in consultation with the Highways Authority". I notice that one of the major omissions of this revised Local Plan is any indication of new Highways anywhere in or around Bicester. Under the sub heading of "Employment", bullet point 3 has the added comment that the area should be "(primarily B8 uses)". This not a suitable area for warehousing as the area is in a densely populated residential location with no adjacent transport infrastructure.</p>
166/31	Helen	Marshall	CPRE Oxfordshire	Main	88	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	Modification for Bicester 12 should be discarded by reverting to the Submission Local Plan for the site and focussing on low-in-scale well-designed buildings (both residential and industrial).			<p>Bicester 12 - The suggested mitigation appears unsound as it attempts to square the circle of "promoting strategic mixed use development while seeking to conserve heritage assets and actively encouraging wildlife potential". It is hard to envisage the Ancient Medieval Village being a feature of the site as it is surrounded by a housing estate and industrial complex with heavy goods vehicles pounding through day and night! Since it is accepted the CTA section should not be developed, why include it in the site at all? The safeguarded land "for future highway capacity improvements to peripheral routes" is presumably for a new ring road running from the A41 just north of Junction 9 of the M40, swinging round the back of the Graven Hill Development across the A41 Aylesbury Road through this new industrial and residential estate at B12, and finishing at the roundabout at Gavray drive. This supposed main road is not identified anywhere in the proposed Local Plan.</p>

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184/3	John and Pam	Roberts		Main	88		The area of land marked for development should be reduced in size so that the wildlife corridor over to Gavray Meadows Wildlife Site in Bicester 13 is maintained and there are no significant negative effects on the CTA. Also change the employment use to primarily B8. Type of employment for this site to be reconsidered. It is very important that none of the land comprising the CTA in Bicester 12 is taken for constructing roads.			Objection raised to the increase in development area at South East Bicester (Policy Bicester 12) resulting in more homes and jobs being proposed. The proposed change is not accompanied with detailed plans of infrastructure, especially roads. The River Ray Conservation Target Area extends from the north east into Bicester 12 and continues across into Bicester 13. This CTA is an important environmental site and closes the Local Wildlife Trust's Upper Ray Living Landscape project. The area is marked for mixed-use however it is not possible for land to be both a conservation area and a housing and employment area. The extended area will negatively affect large areas of the Upper River Ray CTA as well as Gavray Meadows Local Wildlife Site (Bicester 13). Development on or near this land will severely disrupt the important ecology of the CTA and reduce the capacity of the land to support the variety of plants and animals that it currently sustains. Concerned about plans to build a link road from the A41 south of Bicester to connect with other roads.
193/1	Richard	Ponsford		Main	88					Objection raised to the proposed development at South East Bicester (Bicester 12). The current proposal does not attempt to preserve the areas of historical interest that can be found at the site. The road that is intended to feed this new industrial site (running from the A41, behind Graven Hill, finishing up at the Gavray Drive roundabout) is not identified anywhere in the Plan. Public consultation in the lead-up to submission has been inadequate with many residents in Bicester not being aware of the proposals or the Local Plan.
206/1	Julia	Mountford	Boyer Planning / Redrow Homes and Wates Developments	Main	88		Delete the following sentence under bullet point 3 in Infrastructure Needs: " Safeguarding of land for future highway capacity improvements to peripheral routes in consultation with the Highways Authority. " and replace with: " <u>Proposals should address any highway measures arising from the development and take account of other demands on the Highway Network as appropriate.</u> " This will ensure highway infrastructure needs can be proportionately addressed, whilst enabling any alternatives to be appropriately considered.			Oxfordshire County Council has previously carried out transport modelling work to assess the likely impact of the proposed growth as planned in the Submission Cherwell Local Plan. The modelling work remains on-going, a finalised evidence base currently remains unavailable, although it is hoped that this will be put into the public domain in the run-up to the reconvened EIP.
206/2	Julia	Mountford	Boyer Planning / Redrow Homes and Wates Developments	Main	88			The allocation of land for employment development is very much supported as are the proposed use classes.		
206/5	Julia	Mountford	Boyer Planning / Redrow Homes and Wates Developments	Main	88		Delete the last bullet point under Housing: " The provision of extra care housing and the opportunity for community self-build affordable housing. " Reliance should be placed fully upon Policy BSC3 and BSC4. This will ensure the requirements of these main policies do not need to be repeated. This will also ensure there is no ambiguity over the interpretation where only extracts of the main policies are included within the strategic allocation policies.			There continues to be a degree of ambiguity over the way the policy is written with regards to the extra care housing and community self-build housing. The policy introduces new terminology, i.e. self-build affordable housing. All reference to the various types of housing should be consistent.
206/6	Julia	Mountford	Boyer Planning / Redrow Homes and Wates Developments	Main	88		Under Infrastructure Needs amend bullet point 5 as follows: "to include land for the provision of a school on site <u>as appropriate</u> and contributions to secondary education provision." This will factor a degree of flexibility into the policy to consider schools being provided by other sites and in particular the Graven Hill site to the south.			Under Infrastructure Needs, no comments on Health, Open Space or Utilities. Policy wording regarding community facilities is broadly supported. Further agreement over the interpretation of the wording will be addressed through a Statement of Common Ground with the Council. Policy wording on Primary School is broadly supported but request a minor amendment. There is clear commitment to the provision of a new primary school at Graven Hill from a report that went to the Cabinet Member for Children, Education and Families on 10 February 2014.

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206/7	Julia	Mountford	Boyer Planning / Redrow Homes and Wates Developments	Main	88		Bullet point 2 (ESD16) under Key site specific design and place shaping principles seems unnecessary as the Plan must be read as a whole and ESD16 will apply without the need to state its applicability in every allocation policy. Bullet point 4 should be amended to read "...to preserve the SAM's setting," and not "...to maintain the SAM's open setting." The current wording should not pre-determine the issue of openness as material to that setting without a full assessment of the characteristics of the setting, the nature of any impact and the scope of possible mitigation. Bullet point 19 (CTA) - Reference to the additional restriction should be deleted. If not it would be inconsistent with the main policy (ESD11).			Bullet point 1 under Key site specific design and place shaping principles should be flexible such that the land can be delivered on a phased basis, albeit in accordance with an overarching masterplan. Bullet point 4 is supported in principle but request a minor amendment. No comments on Hedgerows and landscaping, Urban edge, Public art, Sustainable connections, Public rights of way, Transport assessment, Public open space layout, Green Infrastructure links, Ecological investigation, Protection of wildlife, Flood risk, Addressing noise issues, Retention of farm buildings, Assessment of agricultural land. Updated wording on Public transport services is welcomed. Bullet point 19 (Conservation Target Area) - The proposed wording goes beyond the requirements of the main policy (ESD 11). It is accepted that the policy or supporting text might refer to the particular importance of the northern section of the site with regards to its ecological importance, subject to an appropriate evidence base. The final bullet point - it is unclear why a soil management plan would be required or what it would achieve.
212/3	Les	Sibley	Local/County Councillors	Main	88	Objection raised to any B8 development proposed for this site as it is not suitable in this densely populated residential area. Objection to the new wording "primarily B8 uses". This development area now extends into the River Ray Conservation Target Area. It is totally impractical as plan shows the area to be allocated for employment and residential.	The Conservation Target Area should be kept free from future development.			
254/9	Mark	Mathews	Thames Water	Main	88					Thames Water has no comments to make on the main modifications or IDP text. The supply and wastewater networks are unlikely to be able to support the demand anticipated from South East Bicester. Infrastructure is likely to be required. Water supply and drainage strategies would be required from the developer. If upgrading is required there could be a delay of up to 3 years for delivery unless the developer requisitions the infrastructure.
266/1	Anna	Power		Main	88	Supporting infrastructure is inadequate. The two junctions which egress and exit Langford Village are of considerable concern. One is a roundabout which is relatively safe but the other, a T junction is dangerous due to motorists travelling at high speed.	It should be ensured that supporting infrastructure is adequate in all respects.			
290/3	Stephen	Willott	Bicester Green Gym	Main	88	The expanded site will negatively affect the Gavray Meadows LWS and the River Ray CTA. A large part of Bicester 12 lies within the CTA and development on or near this land will severely disrupt the ecology of the CTA, reduce the capacity of the site to support the variety of plants and animals it currently sustains, and reduce the ability of the CTA to act as a wildlife corridor through to Bicester 13. The policy therefore conflicts with NPPF section 11 and LP policies ESD10 and ESD11.	The area of land indicated for development that overlaps the CTA on 5.2 Key Polices Map: Bicester, should be reduced in size so that the wildlife corridor over to Gavray Meadows Wildlife Site and the CTA in Bicester 13 is maintained.			
291/1	Polly	Foster		Main	88					This "mixed use" area covers a large area also defined as the River Ray Target Conservation Area. It is incompatible for this land to be both. The Plan does not adequately protect the Target Conservation Area and the Wildlife Corridor and virtually cuts off the Gavray Meadows Wildlife Site
292/2	Nicholas	Cotter		Main	88					Modified Policy SLE 1 makes clear that employment development must be appropriate and respect the character of its surroundings. River Ray CTA - an area of heritage and wildlife interest. It would be impossible to use for residential and employment.
300/6	Penny	Silverwood	Berks, Bucks and Oxon Wildlife Trust (BBOWT)	Main	88		Policy should state that proposals to enhance biodiversity, provide a net gain and improve ecological networks across the site must be focussed on contributing to the targets of the CTA.			Supports the amended bullet point 16 (Green Infrastructure) and bullet point 19 (Conservation Target Area). Supports comments made by Natural England in their response to the consultation. It is not clear whether preliminary ecological surveys have been carried out to inform the proposed extension to this allocated site.

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310/1	Victoria	Walton		Main	88	The section of Wretchwick Farm I am concerned about is the area which would link Gavray Drive to the River Ray conservation area. This is an important corridor for wildlife and plants. One must link the other to allow animals and flowers to flourish. Houses would have a detrimental affect on wildlife in the area.				Please note, I am not opposed to the whole plan. I understand the need for more houses, I just feel building on these precious areas can be avoided and would allow the delicate balance for nature to thrive alongside the new developments.
313/3	Charles	Routh	Natural England	Main	88	South East Bicester (Bicester 12) 1. The specification states "The northern section of the site within the Conservation Target Area should be kept free from built development." We are concerned that there will be pressure to put non built development onto this area, thus prejudicing the aims of the Conservation Target Area. 2. The policy says "Adequate investigation of, protection of and management of protected habitats and species on site given the ecological value of the site, with biodiversity preserved and enhanced". This does not give any clarity over future management of biodiversity on the site. The policy for Gavray Drive addressed this matter "The preparation and implementation of an Ecological Management Plan to ensure the long term conservation of habitats and species within the site.", but omits to ensure that such a plan is agreed with the council. 3. It is necessary to ensure that downstream Sites of Special Scientific Interest are not adversely affected by the development. We advise that the development specification makes reference to this so it is clear to all parties what is required.	1. We advise that the specification be amended to "The northern section of the site within the Conservation Target Area should be kept free from built development and formal recreation." 2. We advise that the following be added to the policy: "The preparation and implementation of an Ecological Management Plan to ensure the long term conservation of habitats and species within the site, to be agreed with the Council". In the absence of the above changes we advise the plan is unsound as it will not be effective. 3. The following wording would address this matter: "Ensure that there are no detrimental impacts on downstream Sites of Special Scientific Interest through hydrological, hydro chemical or sedimentation impacts"			
061/26	Alan	Lodwick		Main	88	Objects to the use of the SHMA figures to inform the Local Plan.	All Modifications relating to the SHMA should be deleted.			
301/40	Bev	Hindle	Oxfordshire County Council	Main	88					Modification 88 - Bicester 12, South East Bicester. The proposed site has been extended to the east and will accommodate 1,500 homes and 40 hectares of employment land. However, there are features of considerable archaeological interest at the site. The results of an archaeological field evaluation will need to be submitted along with any planning application for the site. It is suggested that this should be highlighted in the Key Site Specific Design and Place Shaping Principles section of Policy Bicester 12. Suggested wording is set out in the Table of Detailed Comments.
301/41	Bev	Hindle	Oxfordshire County Council	Main	88					Modification 88 - Bicester 12, South East Bicester. It should be noted that there are ecological constraints with the extension of this site. The extended area contains potential UK Priority Habitat and would abut the Meadows North West of Blackthorn Hill Local Wildlife Site and encroach into the Ray Conservation Target Area. CDC should ensure that they have fully assessed the impact of this potential site allocation on ecology and that any impacts can be avoided or mitigated, or as a last resort, compensated.

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301/71	Bev	Hindle	Oxfordshire County Council	Main	88	<p>Policy Bicester 12 – South East Bicester</p> <p>Education - The policy states that the site is to include a primary school “to include land for the provision of a school on site and contributions to secondary education provision”. The development will need to provide the whole primary school and not just the site for the school.</p> <p>Archaeology - The site contains a scheduled ancient monument of the deserted medieval village of Wretchwick which survives as a series of earthworks. Below ground archaeological features associated with the village also survive within the area. The earthworks of the village extend beyond the current scheduled area which could be considered to be of demonstrably equivalent significance as the designated site and would need to be preserved in line with paragraph 139 of the NPPF.</p> <p>The extension of this allocated site will need to be subject to the same investigation as previously recommended. The results of an archaeological field evaluation will need to be submitted along with any planning application for the site.</p> <p>Public transport - The masterplan should provide a through route for buses between the A4421 Charbridge Lane and the A41 (Aylesbury Road) inclusive of junctions to both roads. The bus route through the site should be reasonably direct, with bus stops provided so that no residential dwelling is more than 500m walking distance from a bus stop. Walking routes are also required from the commercial buildings to these bus stops....</p>	<p>Amend wording under Infrastructure Needs as follows: “Schools – to include the provision of a primary school on the site and financial or in-kind contributions towards secondary education provision”.</p> <p>Add wording in the ‘Key site specific design and place shaping principles’ section to include: “An archaeological field evaluation to assess the impact of the development on archaeological features” Amend the wording in the Key site specific design and place shaping principles section as follows: “Good accessibility to public transport services should be provided for, including a through route for buses between the A4421 Charbridge Lane and the A41 Aylesbury Road, a financial contribution towards the provision of a bus service route through the site and new bus stops on the site with effective footpaths and cycle routes to bus stops from dwellings and commercial buildings”.</p>			
301/71	Bev	Hindle	Oxfordshire County Council	Main	88	<p>Cont.....The through road for bus services should be provided early in the development. Temporary turn-around arrangements for buses may be required if at any time there is no through route. The developers should contribute towards the cost of establishing a bus service to and through the site.....Ecology - There are concerns about the ecological impacts of the proposed extension to this site. The additional site area contains potential UK Priority Habitat and would abut the Meadows North West of Blackthorn Hill Local Wildlife Site and encroach into the Ray Conservation Target Area.</p>	<p>Amend wording under Infrastructure Needs as follows: “Schools – to include the provision of a primary school on the site and financial or in-kind contributions towards secondary education provision”.</p> <p>Add wording in the ‘Key site specific design and place shaping principles’ section to include: “An archaeological field evaluation to assess the impact of the development on archaeological features” Amend the wording in the Key site specific design and place shaping principles section as follows: “Good accessibility to public transport services should be provided for, including a through route for buses between the A4421 Charbridge Lane and the A41 Aylesbury Road, a financial contribution towards the provision of a bus service route through the site and new bus stops on the site with effective footpaths and cycle routes to bus stops from dwellings and commercial buildings”.</p>			
211	Pamela Pat	Roberts Clissold	Save Gavray Meadows Campaign	Main	89	<p>Objection raised to the proposed allocation at Gavray Drive. The land at Gavray Drive has been recognised for many years to be of historical and ecological value and is part of the Ray Conservation Target Area as well as containing a Local Wildlife Site. The allocation of the site is as a result of the increased in housing figures from the SHMA. Most of the site is designated as a Conservation Target Area therefore the site cannot be both for housing and for conservation. It is now important that the land is correctly identified as a Local Wildlife Site. Gavray Meadows Local Wildlife Site is noted for its biodiversity. The site has been allocated without consulting with the local community. A petition of 1,480 signatures has been submitted to the Council.</p>	<p>Remove the site as a proposed strategic allocation for housing.</p>			
129/4	Linda	Ward		Main	89		<p>Compared to the total number of houses planned for the whole of Bicester, the number of houses that need to be removed from the plans for the survival of this important LWS and CTA is small. Suggest that these numbers could be accommodated elsewhere in the Local Plan.</p>			<p>The inclusion of this site makes little sense. The Plan is contradictory and confusing and only serve to demonstrate the site has been added in haste with no proper consideration. The proposal seems to indicate that the site can be preserved as a CTA once hundreds of houses have been built on it. The majority of the site is part of the River Ray CTA. There are no appropriate mitigation measures that can prevent the destruction of the CTA if it is released for development. Three bullet points under Key Site Specific Design and Place Shaping Principles are incompatible with houses use. Bicester 13 does not comply with Policy ESD 10.</p>

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163/4	John	Broad		Main	89		Half of Bicester 13 is shown and recognised as part of the River Ray CTA; The area should be identified as such and the identification for development removed	Agree with and support the Bicester 13 development to the west of Langford Brook	Paragraph 1.100, page 28 of the SA concludes that Bicester 13 "could have a significant negative effect on SA objective 10 (biodiversity) as there are known biodiversity features within close proximity of the sites that could be affected by development."	Bicester 13 as it is incompatible with policies ESD 10: protection and enhancement of biodiversity and the natural environment and ESD 11: Conservation Target Areas. Not in accord with NPPF Section 11 Conserving and enhancing the natural environment, paragraph 114 requires "Local Planning Authorities should, set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure".
166/32	Helen	Marshall	CPRE Oxfordshire	Main	89	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	Any development allocated to Gavray Drive is restricted to the land west of Langford Brook.			Gavray Drive - There is a severe conflict of interest in trying to bring Gavray Drive in as a new Strategic Housing Site when the majority of it lies within the Conservation Target Area of the Ray valley, containing as it does a rich local wildlife habitat. Whereas we agree to the proposed development west of Langford Brook, where the majority of the targeted 300 dwellings could be accommodated, we cannot agree that the "Key Site Specific Design and Place Shaping Principles" listed will provide adequate safeguards to comply with the requirements of policy ESD111 to prevent adverse impact on the CTA, let alone securing a net biodiversity gain as envisaged under NPPF policy 109. What does unnecessarily cramming a few extra houses down the eastern edge of the site, so blocking off the Gavray Local Wildlife Site from the rest of the CTA, achieve? As it is this historic site has been already 'shaved' by the construction of the new railway "chord".
175/5	Mike	Pollard	Banbury Ornithological Society	Main	89	We consider that for the local plan to be legally compliant this development should not be permitted.				The modification states that "Although there are a number of known constraints such as Flood Zone 3, River Ray Conservation Target Area and protected species, this could be addressed with appropriate mitigation measures by any proposal." We do not believe this is a credible statement, nor in the spirit of the CTAs as being areas to target nature conservation and certainly not allow built development that is not compatible with that interest. To achieve a net gain in biodiversity at this site would require the conservation of the existing County Wildlife Site and restoration of the adjoining area, whilst maintaining the connection with the rest of the CTA immediately to the south east. To propose that a major part of the site could be developed for housing without a net impact on biodiversity is not sound.
184/4	John and Pam	Roberts		Main	89		Gavray Meadows Local Wildlife Site/Conservation Target Area should be considered for designation as a Local Green Space. There will need to be restricted access in some parts for instance, to allow management of the west meadowland by various conservation techniques.			Objection raised to the strategic allocation of Bicester 13 (Gavray Drive). The site is divided by Langford Brook and contains a Local Wildlife Site and a larger area, designated as part of the River Ray Conservation Area, which stretches further to the east into Bicester 12. The Sustainability Appraisal
197/5	David	Keene	David Lock Associates / Gallagher Estates	Main	89	Gallagher Estates strongly support the principle of the allocation of land at Gavray Drive, however the wording of new paragraph C.101a requires minor amendment. It is factually incorrect to state that "the majority of the site is part of the River Ray Conservation Target Area". Part of the site lies within the Target Area but not the majority of it.	Amend opening sentence to state: "The majority of the site is part of the River Ray Conservation Target Area."			
221/1	Bob	Hessian	Bicester Local History Society	Main	89		The site as identified should be removed as a strategic site and reinstated as a conservation area. As most features documented in the archaeological report above are found to the east of Langford Brook which runs north/south through site, a smaller development on the west side of the brook of 200 houses, might not be so damaging to the historical or environmental value of Bicester 13 provided there is building east of the Brook.			Object to Bicester 13 - Land at Gavray Drive. It has features of historical value to the town as well as being part of the river ray conservation target area and it contains a local wildlife site. The Council's Local Plan Sustainability Appraisal highlights that development will have a significant negative effect on biodiversity. Policy Bicester 13 is unsound and not justified.
221/2	Bob	Hessian	Bicester Local History Society	Main	89					The historical features present on the site include several small fields with green lanes with hedges dating as late as 16th century and there is ridge and furrow. There are also several ancient footpaths.

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221/3	Bob	Hessian	Bicester Local History Society	Main	89					As the site is close to the town centre it has value as an educational resource and development would be contrary to paragraphs 7 and 126 of the NPPF in terms of the planning system contributing to protecting and enhancing our natural and built environment.
221/4	Bob	Hessian	Bicester Local History Society	Main	89					There is no reference in the Local Plan to the historical value of the site and the Local Plan does not comply with paragraph 169 of the NPPF.
221/5	Bob	Hessian	Bicester Local History Society	Main	89					The Local Plan does not fulfil the criteria given in the Cherwell SA addendum for main modifications (non-technical summary) page 9, para 1.24, table 1 point 10, to conserve and enhance and create resources for the Districts biodiversity and point 11 to protect and enhance and make accessible employment, the District's countryside.
266/2	Anna	Power		Main	89	Supporting infrastructure is inadequate. The two junctions which egress and exit Langford Village are of considerable concern. One is a roundabout which is relatively safe but the other, a T junction is dangerous due to motorists travelling at high speed.	It should be ensured that supporting infrastructure is adequate in all respects.			
290/4	Stephen	Willott	Bicester Green Gym	Main	89	With extended development proposed on the periphery of the town this green space becomes even more important being within the ring road and close to the town centre. Objection is made to any development on the east side of the brook where there are ancient ridge and furrow fields with wetland ecology, as this will impact negatively on the survival of the LWS and CTA. The proposal does not comply with policy ESD10 point 1.	No development to the east of the brook crossing the site to ensure the survival of the CTA and the LWS.			
291/1	Polly	Foster		Main	89		Gavray Meadows to be defined as "Local Green Space" as defined in 76 & 77 of the NPPF			The proximity of the designated 300 houses will negatively impact on the ability to conserve habitats and species on Gavray Meadows Wildlife Site. Gavray Meadows is currently rich with wildlife, including some rare and scarce species. The heritage value of this land seems underestimated in the Local Plan. The pattern of hedgerows and fields has remained unchanged for centuries and the site is part of the very small percentage of wetland meadow left in the country. Bicester 13 are not currently compliant with the NPPF.
292/3	Nicholas	Cotter		Main	89					Allocation for housing is not compatible with the designation of the River Ray Conservation Target Area. The allocation is therefore unsound.
293/3	Wendy	Wright		Main	89		Remove Bicester 13 (Gavray Drive) allocation as a strategic housing site.			Concerned about allocation of Gavray Drive area as a new strategic housing. Forms part of the Upper River Ray Target Conservation Area and also contains a Local Wildlife Site. This site did not have a designation in the previous LP and has important environmental and historical features had been respected. 1,500 signatures saying, "We the undersigned support the preservation of Bicester's Local Wildlife. LP is unsound because it will cause this loss of biodiversity and this goes against the NPPF Section 11. Gavray Meadows are comprised of ancient remnants of land cultivated by traditional farming methods. LP is unsound because building on this site will destroy an historical asset.

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294/1	Tia	Cathey		Main	89		Designate some housing on the west side of Langford Brook, and re-instate the whole area east of the brook as a LWS/CTA. Gavray Meadows LWS/CTA be designated as a Local Green Space as defined in the NPPF page 18,			Site is divided by Langford brook and contains a Local Wildlife Site (LWS) and a larger area, designated as part of the River Ray Conservation Target Area (CTA) which stretches further to the east into Bicester 12- Wretchwick Way. It is incompatible to have both a strategic housing site and a LWS/CTA designated for the same land. We accept that a small numbers of houses may need to be built on some of the land in Bicester 13. Some of the land west of Langford brook is reported to be less biodiverse, having been intensively farmed with pesticides etc. and may provide some housing without damaging rare species. The LWS and the CTA on the east side of the brook should not be built on at all. The town has been noted for its lack of green space. A petition has been signed by approximately 1,500 people asking for Gavray Meadows to be preserved for the town and has been presented to CDC.
310/2	Victoria	Walton		Main	89	Oppose plans to build on the Eastern section of Gavray Drive for the following reasons: 1) the area is a Conservation Trust Area and unsuitable for Strategic Housing Site. The area is of great importance to local and national wildlife. Children take great joy in walking around these areas, noticing the wildlife. It would of great sadness to compromise such a precious resource in favour of houses which could easily be built elsewhere. 2) the map used to demonstrate the area is incorrect when taking into account the new railway expansion.. This results in the assumption of increased "habitats in active CTAs in the district" being incorrect (modification 204 of appendix 6). Indeed, with the proposals affecting both Bicester 12 and 13, the habitats will diminish. 3) Concern regarding the increased risk of flooding in Langford if building goes ahead. Gavray Drive was flooded last winter. If building goes ahead water would hit the nature reserve between Old and New Langford, putting homes on the boundary of the reserve at a greater risk than previously.				Please note, I am not opposed to the whole plan. I understand the need for more houses, I just feel building on these precious areas can be avoided and would allow the delicate balance for nature to thrive alongside the new developments.
266/3	Anna	Power		Main	90	Supporting infrastructure is inadequate. The two junctions which egress and exit Langford Village are of considerable concern. One is a roundabout which is relatively safe but the other, a T junction is dangerous due to motorists travelling at high speed.	It should be ensured that supporting infrastructure is adequate in all respects.			
291/1	Polly	Foster		Main	90		Gavray Meadows to be defined as "Local Green Space" as defined in 76 & 77 of the NPPF			The proximity of the designated 300 houses will negatively impact on the ability to conserve habitats and species on Gavray Meadows Wildlife Site. Gavray Meadows is currently rich with wildlife, including some rare and scarce species. The heritage value of this land seems underestimated in the Local Plan. The pattern of hedgerows and fields has remained unchanged for centuries and the site is part of the very small percentage of wetland meadow left in the country. Bicester 13 are not currently compliant with the NPPF.
291/2	Polly	Foster		Main	91		Gavray Meadows to be defined as "Local Green Space" as defined in 76 & 77 of the NPPF			The proximity of the designated 300 houses will negatively impact on the ability to conserve habitats and species on Gavray Meadows Wildlife Site. Gavray Meadows is currently rich with wildlife, including some rare and scarce species. The heritage value of this land seems underestimated in the Local Plan. The pattern of hedgerows and fields has remained unchanged for centuries and the site is part of the very small percentage of wetland meadow left in the country. Bicester 13 are not currently compliant with the NPPF.

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051/1	Patricia	Clissold	Campaign to Save Gavray Wildlife Meadows	Main	91					Area should be protected from development because of its historical, wildlife and heritage significance. Falls in the river Ray Target Conservation Area. There are important BAP species. It is a living museum of farming up to the 1950s. Development would be contrary to guidance in the NPPF and the NPPG in relation to the protection of the natural and historic environment. Access to the countryside should be protected.
059/1	Dominic	Woodfield	Bioscan UK Limited	Main	91		Modify policy to reduce the 300 unit figure to 250 units		The scorings awarded to the various objectives in the SA in respect of Policy 13 fail to recognise that the all of the stated policy commitments cannot be practically achieved alongside 300 units. It appears that the SA has assumed at face value that 300 units can be delivered whilst "ensuring development is limited to the areas identified as having low sensitivity to development". The SA's consideration of Policy 13 is therefore demonstrably flawed and it suggests that the SA suffers from a lack of objectivity. Site area figure in the SA is not 24.78ha but around 22ha. Such errors compound the problems with incorrect assumptions of site capacity and yield.	There should be a cap of 250 units on the site in order to secure sustainable development. This is based on the evidence-based appraisal of the site's development potential, as well as professional experience of the masterplanning process. I am not sure why the Council has seen fit to try and raise this figure. I have seen nothing in the revised evidence base sent out for consultation that gives any rationale for doing so, other than perhaps the obvious and understandable desire to squeeze as much as possible into existing and new allocations to meet the District-wide deficit. But as an approach to forward planning, this of itself is not 'positive preparation'. The Gavray Drive Policy has resulted in a proposed policy with irreconcilable internal conflicts. Without modification to a reduced number of units it the policy cannot militate against net loss to biodiversity and does not therefore comply with the NPPF.
097/13	Sue	Mackrell	Bicester Town Council	Main	91	Concern that insufficient protection is given to nature reserves and wildlife sites. In particular, Gavray Drive nature reserve seems to be at risk with the extent of the proposed development	Would like stronger policies for protection of flora and fauna in these vulnerable areas.			
114/1	Jeffrey	Brindle		Main	91					The Council does not appear to have followed the proper procedures with respect to the role of a Medieval Village in the historic landscape. There are no other areas in the vicinity where the hedgerows are mapped back to 1815 by the Ordnance Survey and are on maps even older (1610) as the enclosures were happening around Launton Manor. Gavray is a living museum. The footpaths leading to and from the Wretchwick Medieval Village have not been respected. They will no longer be country walks. Under the heading "Key Site Specific Design and Place Shaping Principles", bullet points 3-5 have not been followed in the Local Plan. Housing on the larger area to the west of the site is agreed but it doesn't seem sensible to compromise the River Ray CTA with a few houses along the edge of the wildlife site. It is not essential to locate this small number of houses in this particular area. There are several adjacent areas which could easily accommodate a small increase in the number of houses.
116/2	Jack	Moeran	Environment Agency	Main	91	The proposed site boundary now includes significant areas at medium (Flood Zone 2) and high (Flood Zone 3) flood risk, as well as having a section of the Langford Brook (Main River) running directly through the centre of the site. Wording on Policy Bicester 13 needs to be amended to reflect the increase in flood risk that is associated with the site. The site has sufficient space (approx 15ha) to accommodate all housing within Flood Zone 1 (low risk of flooding). The policy must ensure that development is delivered in the most sustainable way and housing is located in areas at the lowest risk of flooding to keep future occupants safe.	At present the wording of the policy only requests flood risk is considered in a Flood Risk Assessment (FRA). The policy wording needs to be much stronger and amended to: <u>No housing will be located in Flood Zone 2/3 and the principles set out in Policy ESD 6: Sustainable Flood Risk Management will be followed.</u>		No comment	
161/7	Martin	Small	English Heritage	Main	91					English Heritage welcomes the key site specific design and place shaping principle in Proposed Policy Bicester 13 for an archaeological investigation to inform an archaeological mitigation scheme as required.

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193/2	Richard	Ponsford		Main	91					Objection raised to the proposed development at Gavray Drive (Bicester 13). The site is home to a wide variety wildlife species, including several that are of protected status. The area is widely used by residents, naturalists and dog walkers. Gavray wildlife meadows should be designated as a Local Green Space. Development on this site would cause flooding. Gavray Meadows becomes a marshland during the winter months.
197/6	David	Keene	David Lock Associates / Gallagher Estates	Main	91	<p>Policy 13 is supported however some minor amendments are required to ensure the policy is both justified and effective: Site capacity remains to be precisely determined so we request that the word circa is added to the reference to 300 homes and site area. The policy can be read as precluding any development within the River Ray Conservation Target Area (RRCTA). Policy ESD11 Conservation Target Areas does not seek to restrict development within CTAs but instead states that "where development is proposed within or adjacent to Conservation Target Areas biodiversity surveys and a report will be required to identify constraints and opportunities for biodiversity enhancements". Policy ESD13 should be amended to bring it in line with this policy. Development of the part of the RRCTA outside of the Local Wildlife Site (LWS) will be balanced through securing the long-term restoration, management, maintenance and enhancement of the part of the LWS within the developer's control.....</p>	Amendments to policy text provided.		The Sustainability Appraisal does not mention the Target Area in relation to Gavray Drive.	
197/6	David	Keene	David Lock Associates / Gallagher Estates	Main	91	<p>Cont.....The RRCTA is an "alluvial floodplain". The yellow hatching on the Proposal Map amended shows the extent of the floodplain to be larger than it actually is. Policy 13 requires the provision of extra care housing, Gallagher Estates consider that more flexibility should be provided in the wording to demonstrate that such an element would be considered as part of the overall housing mix, alongside wider considerations of development viability. NPPG states that contributions towards public art do not meet the relevant Regulation 122 tests for the provision of developer contributions , the policy should be reworded to refer to "opportunities" rather than "provision for" to accord with national policy.</p>	Amendments to policy text provided.		The Sustainability Appraisal does not mention the Target Area in relation to Gavray Drive.	
254/2	Mark	Mathews	Thames Water	Main	91					Thames Water has no comments to make on the main modifications or IDP text. It does not envisage infrastructure concerns regarding Water Supply capability for Gavray Drive. The wastewater network is unlikely to be able to support the demand from Gvaray Drive. Infrastructure is likely to be required. Water supply and drainage strategies would be required from the developer. If upgrading is required there could be a delay of up to 3 years for delivery unless the developer requisitions the infrastructure.
266/4	Anna	Power		Main	91	Supporting infrastructure is inadequate. The two junctions which egress and exit Langford Village are of considerable concern. One is a roundabout which is relatively safe but the other, a T junction is dangerous due to motorists travelling at high speed.	It should be ensured that supporting infrastructure is adequate in all respects.			
291/2	Polly	Foster		Main	91		Gavray Meadows to be defined as "Local Green Space" as defined in 76 & 77 of the NPPF			The proximity of the designated 300 houses will negatively impact on the ability to conserve habitats and species on Gavray Meadows Wildlife Site. Gavray Meadows is currently rich with wildlife, including some rare and scarce species. The heritage value of this land seems underestimated in the Local Plan. The pattern of hedgerows and fields has remained unchanged for centuries and the site is part of the very small percentage of wetland meadow left in the country. Bicester 13 are not currently compliant with the NPPF.

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300/7	Penny	Silverwood	Berks, Bucks and Oxon Wildlife Trust (BBOWT)	Main	91					Support the concerns and recommendations in Natural England's response to the consultation with regards to the number of houses to be achieved by this policy and the ability for all other aspects of the policy to be delivered.
300/9	Penny	Silverwood	Berks, Bucks and Oxon Wildlife Trust (BBOWT)	Main	91		Bullet point 3 under Key site specific design and place shaping principles should be amended to read: "That part of the site within the Conservation Target Area should be kept free from built development <u>and formal recreation</u> ."			Support bullet points 3 (Conservation Target Area), 4 (Local Wildlife Site) and 5 (ecological impacts), 6 (Ecological Management Plan), 8 (structural landscape scheme), 9 (Langford Brook), 11 (Green Infrastructure), 17 (lighting) and 19 (climate change) under Key site specific design and place shaping principles.
313/4	Charles	Routh	Natural England	Main	91	Gavray Drive (Bicester 13) 1. This allocation is highly environmentally constrained. Whilst it seems likely much of the housing can be delivered, we are very concerned that delivering the full quanta will be incompatible with other elements of the policy, and is thus undeliverable and unsound. We thus advise that either a) additional evidence is provided showing that the policy is deliverable/justified (and if not, housing numbers adjusted accordingly) bearing in mind CTA, flood zone, rights of way and hedgerow buffer constraints, or b) the policy is amended to read "Number of homes - up to 300 dwellings" (with associated changes elsewhere). 2. We note that the policy says "No formal recreation within the Local Wildlife Site." We advise that this requirement should extend to the whole Conservation Target Area. 3. We note the policy says "The preparation and implementation of an Ecological Management Plan to ensure the long term conservation of habitats and species within the site." This omits to ensure that such a plan is agreed with the council, and informed by knowledgeable local biodiversity interest groups.....	1. a) provide additional evidence showing that the policy is deliverable/justified (and if not, housing numbers adjusted accordingly) bearing in mind CTA, flood zone, rights of way and hedgerow buffer constraints, or b) amend the policy to read "Number of homes - <u>up to 300 dwellings</u> " (with associated changes elsewhere). 2. We advise the following change: "That part of the site within the Conservation Target Area should be kept free from built development <u>and formal recreation</u> . No formal recreation within the Local Wildlife Site. " In the absence of this change we advise the plan is unsound as it will not be effective. 3. We advise that the policy says "The preparation and implementation of an Ecological Management Plan to ensure the long term conservation of habitats and species within the site, <u>to be agreed with the Council in-consultation with local biodiversity interest groups</u> ." In the absence of this change we advise the plan is unsound as it will not be effective....			
313/4	Charles	Routh	Natural England	Main	91	Cont.....4. An issue that has arisen during the planning history of the site is the need to ensure that downstream Sites of Special Scientific Interest are not adversely affected by the development. We advise that the development specification makes reference to this so it is clear to all parties what is required. 5. Mod 91 says "The western part of the site may include improved grassland (a BAP priority habitat)." Improved grassland is not a BAP priority habitat. It should be clarified what is meant by this statement. If it is thought this part of the site may contain constraining levels of BAP priority habitat, this should be ascertained prior to setting a quanta for the site (unless it is maximum quanta).	Cont.....4. The following wording would address this matter: " <u>Ensure that there are no detrimental impacts on downstream Sites of Special Scientific Interest through hydrological, hydro chemical or sedimentation impacts</u> ". This matter also applies to Bicester 12, and an associated change should be made. 5. We thus advise that to be sound, either it is confirmed that constraining levels of BAP priority habitat are not present, or that the quanta is low enough or flexible enough to ensure the priority habitat is not impacted.			
301/72	Bev	Hindle	Oxfordshire County Council	Main	91	Policy Bicester 13 – Gavray Drive Archaeology - The site is located in an area of archaeological potential as identified by the geophysical survey and trenched evaluation. The archaeological geophysical survey and evaluation recorded aspects of an Iron Age and Roman settlement site and produced sherds of Saxon pottery. The Roman material was mostly found to the North of the site, close to an area of Roman settlement recorded north of the railway in 1996 which produced evidence of high status Roman occupation in the area in the form of a writing tablet, the only one from Oxfordshire, found in the backfill of a well (PRN 26122). An enclosure ditch was recorded along with a number of ditches or gullies. Further evaluation on the site, to the NW of the site recorded a pit, dated to the Iron Age, and two gullies. Some areas of the site could not be evaluated due to access restraints and so it is conceivable that further deposits exist on the site. Ecology - The site is ecologically sensitive (including a Local Wildlife Site, European Protected Species and notable species). The District Council should seek the advice of their ecologist to assess whether or not this level of development could be achieved on the site. Public transport – The policy should refer to the importance of securing good public transport connections and services.	Amend the wording in the 'Key site specific design and place shaping principles' section to include: <u>"An archaeological field evaluation to assess the impact of the development on archaeological features"</u> Amend the wording in the 'Key site specific design and place shaping principles' section to include: <u>"Additional bus stops on the A4421 Charbridge Lane will be provided, with connecting footpaths from the development. The developers will contribute towards the cost of improving bus services in the wider South East Bicester area."</u>			

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047/20	Matthew	Coyne	Banbury Town Council	Main	92					Concern that Proposal would lead to large scale B8 warehousing development which employ not very highly skilled workers.
302/4	David	Jackson	Savills	Main	92			Supported, insofar as additional employment allocation is identified at Banbury on land north east of Junction 11 of the M40. Given the very significant increase in the scale of housing allocations at Banbury, additional employment allocation for the town has been made even more compelling.	Welcome the analysis of the site contained in the SA Addendum. The SA identifies one significant adverse effect of the allocation and that is in relation to the loss of greenfield land. This is however an inevitable consequence of providing additional land for development at Banbury, given the lack of brownfield alternatives. The other adverse effects are assessed in the SA as being minor and are not considered to outweigh the benefits of allocating the site.	
047/21	Matthew	Coyne	Banbury Town Council	Main	93					Object to the removal of the sentence relating to the need for a green buffer south of Saltway
251/9	Heather	Vickers	Planning Potential / Gleeson Developments Ltd	Main	93	The removal of this paragraph is unjustified in that the strong views afforded to the southwest of Banbury over land south of Crouch Hill remains a principal vista on this edge of the town.	Rather than a deletion of paragraph C.124 – replace with the following wording: <u>To the south of Salt Way there is a need to retain the open aspect of the south west of the town in order to protect its clearly defined and strong rural setting.</u>			
166/60	Helen	Marshall	CPRE Oxfordshire	Main	94	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			
061/27	Alan	Lodwick		Main	94	Objects to the use of the SHMA figures to inform the Local Plan.	All Modifications relating to the SHMA should be deleted.			
047/23	Matthew	Coyne	Banbury Town Council	Main	95					Objects to reduction of housing numbers from 950 to 700 on the Canalside site. Object to no provision being made for a school site. New development will increase pressure on existing schools, and infrastructure.
047/24	Matthew	Coyne	Banbury Town Council	Main	96					Support the relocation of businesses to other sites within the town centre and preservation of older industrial buildings.
161/8	Martin	Small	English Heritage	Main	96		Although not considering the Local Plan to be unsound on this point, English Heritage suggests that the proposed additional wording in the fifth bullet point of Policy Banbury 1 be revised as follows: "A number of the older buildings and the site of the former industrial premises, offer considerable opportunities for re-use or re-development for industrial enterprises.....".			
164/1	Sarah	Smith	Rapleys LLP / Pandora Trading Ltd	Main	97	Objection is raised to the reduction in the Banbury 2 site area from 43ha to 34ha. There is no rationale to reducing the site area of Banbury 2 west of Southam Road, limiting development to the south-eastern corner and designating the remainder of the land as green buffer - no evidence has been produced to substantiate these changes; The changes are not informed by a clear and robust evidence base and as such, the changes in respect of BAN2 are arbitrary and inconsistent with the material in the evidence base; The inclusion of the land within the BAN2 allocation would accord with the principles of sustainability and the spatial vision of the Local Plan; The BAN2 policy allocation should be restored to that in the Proposed Submission Local Plan of August 2012 – site area and boundaries increased to 43ha, the removal of the green buffer designation and the housing yield increased to 800 units.	the site area of 34ha should be deleted and replaced with a site area of 43ha and the allocation increased from 600 to 800 units, as per the Proposed Submission Draft Local Plan, August 2012.		Not in relation to these particular modifications. Comments in respect of the Sustainability Appraisal are submitted under a separate representation.	Objection is raised to the reduction in the Banbury 2 site area from 43ha to 34ha.
047/25	Matthew	Coyne	Banbury Town Council	Main	98					Support developer contributions to the provision of secondary school provision.

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164/3	Sarah	Smith	Rapleys LLP / Pandora Trading Ltd	Main	98	Objection is raised to the requirement for contribution to secondary education in relation to the Banbury 2 policy. Planning permission for 600 units on Banbury 2 has already been granted and this was on the basis that there was no secondary education contribution requirement. Such criterion can not now be introduced or requested retrospectively. Furthermore, the contribution to secondary education criterion is inconsistently applied throughout the site specific policies.	The requirement for secondary education contribution in relation to Banbury 2 should be removed. Alternatively, the requirement should be worded consistently across all site specific policies, and should be qualified, by the phrase 'subject to further appropriate analysis'.		No comments in relation to this Modification. Separate representation is made to the Sustainability Appraisal.	Objection is raised to the requirement for contribution to secondary education in relation to the Banbury 2 policy.
119	Peter	Frampton	Framptons / Hallam Land	Main	100				The SA has not necessarily determined the site capacity.	A planning application for the provision of new homes is currently being prepared for submission to the Local Planning Authority. Supports the modification that identifies the potential capacity of the allocation as being 'circa 600' dwellings. It is understood to be acknowledged by the LPA that presently the identified site capacity has not been derived from any detailed design analysis. As such the precise capacity of the allocation will be determined through the development management process, with due consideration being given to the provisions of the accompanying Design and Access Statement and the accompanying technical and environmental reports. It is considered that the allocation has a capacity in excess of 600 dwellings, potentially towards 750 dwellings, while satisfactorily presenting good design which meets the LPA's design standards. The capacity of the site will be settled through the planning application process.
047/26	Matthew	Coyne	Banbury Town Council	Main	100					Supports increase in housing on Bankside (phase 2) however concerns are expressed relating to the increase in traffic congestion in the town. Developer contributions should be sought for a southern link road.
166/61	Helen	Marshall	CPRE Oxfordshire	Main	100	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			
254/1	Mark	Mathews	Thames Water	Main	100					Thames Water has no comments to make on the main modifications or IDP text. The supply and wastewater networks are unlikely to be able to support the demand anticipated from Bankside Phase 2. Infrastructure is likely to be required. Water supply and drainage strategies would be required from the developer. If upgrading is required there could be a delay of up to 3 years for delivery unless the developer requisitions the infrastructure.
061/28	Alan	Lodwick		Main	100	Objects to the use of the SHMA figures to inform the Local Plan.	All Modifications relating to the SHMA should be deleted.			
301/74	Bev	Hindle	Oxfordshire County Council	Main	100	Policy Banbury 4: Bankside Phase 2 Education – Access should be safeguarded through Banbury 4 to the 8.42 hectares of land reserved in Banbury 12 for a new secondary school. Archaeology - The site is located within an area of archaeological potential along the line of a possible Roman road (HER 11617) and north of a series of possible Neolithic cropmarks (HER 5700). Archaeological features may therefore survive within the site. Minerals - Banbury 4 affects deposits of ironstone. However, it is not considered that there would be sufficient potential impact on possibly workable mineral resources to justify an objection on minerals sterilisation policy grounds.	Amend policy wording accordingly. Amend the wording in the 'Key site specific design and place shaping principles' section to include: <u>"An archaeological field evaluation to assess the impact of the development on archaeological features"</u>			
047/27	Matthew	Coyne	Banbury Town Council	Main	101					Support enhancement of public rights of way

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161/9	Martin	Small	English Heritage	Main	101		prefer this key site specific design and place shaping principle to read "Development proposals to be accompanied and influenced by a landscape and visual impact assessment and a heritage impact assessment"			English Heritage welcomes the addition of a requirement to Policy Banbury 4 that development proposals should be accompanied by a heritage assessment
202/1	Jane	Hennell	The Canal & River Trust	Main	101			Welcomes the recognition that links will be provided to the PROW network, including the Oxford Canal towpath. Assume that this will be supported by planning obligations to ensure that the towpat is suitable to cater for this additional use as identified in the IDP.		
047/28	Matthew	Coyne	Banbury Town Council	Main	102					Support increased capacity on Banbury 5 (North of Hanwell Fields)
156/1	Neil	Roe	Amber Developments / Mr and Mrs Donger	Main	102				The conclusions of the SA Addendum for site BA367 as having low capacity for residential due to the impact on the landscape character and visual quality of the area are not accepted.	Site - Land North of Dukes Meadow Drive, Banbury is an area of 19.5 ha sited adjacent to Hanwell Fields development. It is promoted for residential care home and recreational uses. The land could accommodate up to 400 dwellings based on 30 dph and loss of 30% of site area to infrastructure. The allocation of this site will deliver sustainable development and assist the District's full objectively assessed needs. It would complement Banbury 2 and Banbury 5 and assist vitality and viability of further opens pace and strategic sport provision, biodiversity and green infrastructure and improve accessibility and linkages to local services, in particular pedestrian and cycle links. Modifications 102 and 103 for Banbury 5 are supported but not considered sufficient given Cherwell's housing needs and additional land north of Dukes Meadow Drive should be allocated.
166/62	Helen	Marshall	CPRE Oxfordshire	Main	102	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			
061/29	Alan	Lodwick		Main	102	Objects to the use of the SHMA figures to inform the Local Plan.	All Modifications relating to the SHMA should be deleted.			
156/2	Neil	Roe	Amber Developments / Mr and Mrs Donger	Main	103				The conclusions of the SA Addendum for site BA367 as having low capacity for residential due to the impact on the landscape character and visual quality of the area are not accepted.	Site - Land North of Dukes Meadow Drive, Banbury is an area of 19.5 ha sited adjacent to Hanwell Fields development. It is promoted for residential care home and recreational uses. The land could accommodate up to 400 dwellings based on 30 dph and loss of 30% of site area to infrastructure. The allocation of this site will deliver sustainable development and assist the District's full objectively assessed needs. It would complement Banbury 2 and Banbury 5 and assist vitality and viability of further opens pace and strategic sport provision, biodiversity and green infrastructure and improve accessibility and linkages to local services, in particular pedestrian and cycle links. Modifications 102 and 103 for Banbury 5 are supported but not considered sufficient given Cherwell's housing needs and additional land north of Dukes Meadow Drive should be allocated.
166/63	Helen	Marshall	CPRE Oxfordshire	Main	103	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			
254/7	Mark	Mathews	Thames Water	Main	103					Thames Water has no comments to make on the main modifications or IDP text. The supply and wastewater networks are unlikely to be able to support the demand anticipated from North of Hanwell Fields. Infrastructure is likely to be required. Water supply and drainage strategies would be required from the developer. If upgrading is required there could be a delay of up to 3 years for delivery unless the developer requisitions the infrastructure.
061/30	Alan	Lodwick		Main	103	Objects to the use of the SHMA figures to inform the Local Plan.	All Modifications relating to the SHMA should be deleted.			

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047/29	Matthew	Coyne	Banbury Town Council	Main	105					Supports the reservation of land for a new inner relief road connection.
186/9	Rob	Kinchin-Smith	Banbury Civic Society	Main	105		This site has been extended to link with new site Banbury 19 therefore a spine road through Banbury 6 and Banbury 19 could be linked to one another, so as to provide a useful addition to the local road network, whether or not the South-to-East link road is built.			This site provides the only available route for a south-to-east link road. It is essential that development of this site delivers a spine road capable of through use, both for route Option 1 and route Option 2, whether or not built in its entirety in this Plan period. Development on this site must allow for such a through route to be built in the future.
047/30	Matthew	Coyne	Banbury Town Council	Main	106					Concern over the increased traffic congestion resulting from increased employment east of the railway line and canalside.
116/3	Jack	Moeran	Environment Agency	Main	106	The proposed site boundary now includes an even larger area at medium (Flood Zone 2) and high (Flood Zone 3) flood risk. The site has been included within the submitted Sequential and Exception Test (Flooding) document (Aug 2014). Whilst the site has been included in the table of sites with significant proportions of the site in Flood Zones 2 and 3, there is no mention of the enlarged site having passed the Sequential and Exception test in the Plan. The policy is unsound until clarification is given that the site has passed the Sequential and Exceptions test.	Clarification is needed in the Sequential and Exception test document to state that the site has passed the test.		No comment	
161/10	Martin	Small	English Heritage	Main	106		prefer this key site specific design and place shaping principle to read "Development proposals to be accompanied and influenced by a landscape and visual impact assessment and a heritage impact assessment".			English Heritage welcomes the addition of a requirement to Policy Banbury 6 that development proposals should be accompanied by a heritage assessment. English Heritage also welcomes the addition at the Submission stage of the key site specific design and place shaping principle that "Development must not adversely affect the significance of the Banbury No 9 Scheduled monument on the east side of the M40 or the associated archaeological remains of the filling factory on the west side of the motorway, which although not scheduled, are regarded by English Heritage as being of national importance and which should therefore be considered in the same way as a Scheduled Monument").
166/3	Helen	Marshall	CPRE Oxfordshire	Main	106	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			The increase in overall housing numbers applied to the District as a whole (from 16,750 to 22,840) is even more exaggerated in the case of Bicester, which is supposed to increase its target by no less than 47% (6,894 to 10,129). CPRE is especially concerned over the downstream effects of increasingly rapid run off, which, with the growing intensity of rainfall events is unlikely to be properly mitigated by SUDS. And overall the inevitable major increase in road traffic stemming from all this development will result in a noticeable feeling of urbanisation in what is a predominantly rural district (SA para 1.137). The effect of setting such a target is addressed by the Sustainability Appraisal prepared by LUC. This states that too rapid and too large a scale of growth could (we would say will) place the services, facilities, and infrastructure of the town under (considerable) strain (SA para 1.74). The SA goes on to say that the cumulative effect of so much new housing will have a significant adverse effect through loss of greenfield and agricultural land, and is likely to have a similar adverse effect on air quality, biodiversity and landscape (SA para 1.136). Pressure on water resources and waste treatment will intensify (SA para 1.138)
186/10	Rob	Kinchin-Smith	Banbury Civic Society	Main	106					Strongly supports the Key site specific design and place shaping principles particular those regarding the Scheduled Ancient Monument and boundary landscaping. Strongly supports the extension of the site. The spine road through the site needs to be capable of through use, both for south-to-east link route Option 1 and for route Option 2, whether or not built in its entirety in this Plan period.

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300/10	Penny	Silverwood	Berks, Bucks and Oxon Wildlife Trust (BBOWT)	Main	106		The policy should include reference to enhancing biodiversity outside to achieve a net gain and to retain and enhance ecological networks.			Support bullet point 13 (ecological survey) under Key site specific design and place shaping principles.
301/75	Bev	Hindle	Oxfordshire County Council	Main	106	Banbury 6 – Employment Land West of M40	Amend the wording in the 'Key site specific design and place shaping principles' section to include <u>a requirement for developers to contribute to the cost of establishing bus services to this area, linking with residential parts of Banbury, to reduce the over-dependence on the car as a means of travel for work journeys within the town, and consequent congestion on Banbury's strategic road network.</u>			
047/31	Matthew	Coyne	Banbury Town Council	Main	107					Concern over preservation of listed buildings
166/4	Helen	Marshall	CPRE Oxfordshire	Main	107	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			<p>The increase in overall housing numbers applied to the District as a whole (from 16,750 to 22,840) is even more exaggerated in the case of Bicester, which is supposed to increase its target by no less than 47% (6,894 to 10,129). CPRE is especially concerned over the downstream effects of increasingly rapid run off, which, with the growing intensity of rainfall events is unlikely to be properly mitigated by SUDS. And overall the inevitable major increase in road traffic stemming from all this development will result in a noticeable feeling of urbanisation in what is a predominantly rural district (SA para 1.137).</p> <p>The effect of setting such a target is addressed by the Sustainability Appraisal prepared by LUC. This states that too rapid and too large a scale of growth could (we would say will) place the services, facilities, and infrastructure of the town under (considerable) strain (SA para 1.74). The SA goes on to say that the cumulative effect of so much new housing will have a significant adverse effect through loss of greenfield and agricultural land, and is likely to have a similar adverse effect on air quality, biodiversity and landscape (SA para 1.136). Pressure on water resources and waste treatment will intensify (SA para 1.138).</p>
047/32	Matthew	Coyne	Banbury Town Council	Main	108					Supports the provision of retail provision at Calthorpe Road.
166/5	Helen	Marshall	CPRE Oxfordshire	Main	108	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			<p>The increase in overall housing numbers applied to the District as a whole (from 16,750 to 22,840) is even more exaggerated in the case of Bicester, which is supposed to increase its target by no less than 47% (6,894 to 10,129). CPRE is especially concerned over the downstream effects of increasingly rapid run off, which, with the growing intensity of rainfall events is unlikely to be properly mitigated by SUDS. And overall the inevitable major increase in road traffic stemming from all this development will result in a noticeable feeling of urbanisation in what is a predominantly rural district (SA para 1.137).</p> <p>The effect of setting such a target is addressed by the Sustainability Appraisal prepared by LUC. This states that too rapid and too large a scale of growth could (we would say will) place the services, facilities, and infrastructure of the town under (considerable) strain (SA para 1.74). The SA goes on to say that the cumulative effect of so much new housing will have a significant adverse effect through loss of greenfield and agricultural land, and is likely to have a similar adverse effect on air quality, biodiversity and landscape (SA para 1.136). Pressure on water resources and waste treatment will intensify (SA para 1.138).</p>

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166/6	Helen	Marshall	CPRE Oxfordshire	Main	109	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			<p>The increase in overall housing numbers applied to the District as a whole (from 16,750 to 22,840) is even more exaggerated in the case of Bicester, which is supposed to increase its target by no less than 47% (6,894 to 10,129). CPRE is especially concerned over the downstream effects of increasingly rapid run off, which, with the growing intensity of rainfall events is unlikely to be properly mitigated by SUDS. And overall the inevitable major increase in road traffic stemming from all this development will result in a noticeable feeling of urbanisation in what is a predominantly rural district (SA para 1.137).</p> <p>The effect of setting such a target is addressed by the Sustainability Appraisal prepared by LUC. This states that too rapid and too large a scale of growth could (we would say will) place the services, facilities, and infrastructure of the town under (considerable) strain (SA para 1.74). The SA goes on to say that the cumulative effect of so much new housing will have a significant adverse effect through loss of greenfield and agricultural land, and is likely to have a similar adverse effect on air quality, biodiversity and landscape (SA para 1.136). Pressure on water resources and waste treatment will intensify (SA para 1.138).</p>
166/7	Helen	Marshall	CPRE Oxfordshire	Main	110	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			<p>The increase in overall housing numbers applied to the District as a whole (from 16,750 to 22,840) is even more exaggerated in the case of Bicester, which is supposed to increase its target by no less than 47% (6,894 to 10,129). CPRE is especially concerned over the downstream effects of increasingly rapid run off, which, with the growing intensity of rainfall events is unlikely to be properly mitigated by SUDS. And overall the inevitable major increase in road traffic stemming from all this development will result in a noticeable feeling of urbanisation in what is a predominantly rural district (SA para 1.137).</p> <p>The effect of setting such a target is addressed by the Sustainability Appraisal prepared by LUC. This states that too rapid and too large a scale of growth could (we would say will) place the services, facilities, and infrastructure of the town under (considerable) strain (SA para 1.74). The SA goes on to say that the cumulative effect of so much new housing will have a significant adverse effect through loss of greenfield and agricultural land, and is likely to have a similar adverse effect on air quality, biodiversity and landscape (SA para 1.136). Pressure on water resources and waste treatment will intensify (SA para 1.138).</p>
166/7	Helen	Marshall	CPRE Oxfordshire	Main	110	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			<p>The increase in overall housing numbers applied to the District as a whole (from 16,750 to 22,840) is even more exaggerated in the case of Bicester, which is supposed to increase its target by no less than 47% (6,894 to 10,129). CPRE is especially concerned over the downstream effects of increasingly rapid run off, which, with the growing intensity of rainfall events is unlikely to be properly mitigated by SUDS. And overall the inevitable major increase in road traffic stemming from all this development will result in a noticeable feeling of urbanisation in what is a predominantly rural district (SA para 1.137).</p> <p>The effect of setting such a target is addressed by the Sustainability Appraisal prepared by LUC. This states that too rapid and too large a scale of growth could (we would say will) place the services, facilities, and infrastructure of the town under (considerable) strain (SA para 1.74). The SA goes on to say that the cumulative effect of so much new housing will have a significant adverse effect through loss of greenfield and agricultural land, and is likely to have a similar adverse effect on air quality, biodiversity and landscape (SA para 1.136). Pressure on water resources and waste treatment will intensify (SA para 1.138).</p>
047/33	Matthew	Coyne	Banbury Town Council	Main	111					Support for additional 200 dwellings on Bolton Road

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166/8	Helen	Marshall	CPRE Oxfordshire	Main	111	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			<p>The increase in overall housing numbers applied to the District as a whole (from 16,750 to 22,840) is even more exaggerated in the case of Bicester, which is supposed to increase its target by no less than 47% (6,894 to 10,129). CPRE is especially concerned over the downstream effects of increasingly rapid run off, which, with the growing intensity of rainfall events is unlikely to be properly mitigated by SUDS. And overall the inevitable major increase in road traffic stemming from all this development will result in a noticeable feeling of urbanisation in what is a predominantly rural district (SA para 1.137).</p> <p>The effect of setting such a target is addressed by the Sustainability Appraisal prepared by LUC. This states that too rapid and too large a scale of growth could (we would say will) place the services, facilities, and infrastructure of the town under (considerable) strain (SA para 1.74). The SA goes on to say that the cumulative effect of so much new housing will have a significant adverse effect through loss of greenfield and agricultural land, and is likely to have a similar adverse effect on air quality, biodiversity and landscape (SA para 1.136). Pressure on water resources and waste treatment will intensify (SA para 1.138).</p>
047/34	Matthew	Coyne	Banbury Town Council	Main	112					Support for additional 200 dwellings on Bolton Road, and developer contribution towards a secondary school.
161/11	Martin	Small	English Heritage	Main	112					English Heritage welcomes and supports the proposed additional key site specific design and place shaping principle "Residential development that is designed to a very high quality considering the impact on the conservation area".
166/9	Helen	Marshall	CPRE Oxfordshire	Main	112	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			<p>The increase in overall housing numbers applied to the District as a whole (from 16,750 to 22,840) is even more exaggerated in the case of Bicester, which is supposed to increase its target by no less than 47% (6,894 to 10,129). CPRE is especially concerned over the downstream effects of increasingly rapid run off, which, with the growing intensity of rainfall events is unlikely to be properly mitigated by SUDS. And overall the inevitable major increase in road traffic stemming from all this development will result in a noticeable feeling of urbanisation in what is a predominantly rural district (SA para 1.137).</p> <p>The effect of setting such a target is addressed by the Sustainability Appraisal prepared by LUC. This states that too rapid and too large a scale of growth could (we would say will) place the services, facilities, and infrastructure of the town under (considerable) strain (SA para 1.74). The SA goes on to say that the cumulative effect of so much new housing will have a significant adverse effect through loss of greenfield and agricultural land, and is likely to have a similar adverse effect on air quality, biodiversity and landscape (SA para 1.136). Pressure on water resources and waste treatment will intensify (SA para 1.138).</p>
186/12	Rob	Kinchin-Smith	Banbury Civic Society	Main	112					The change of proposed use of the Bolton Road site from mixed use to primarily residential is strongly supported.
061/31	Alan	Lodwick		Main	112	Objects to the use of the SHMA figures to inform the Local Plan.	All Modifications relating to the SHMA should be deleted.			

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301/76	Bev	Hindle	Oxfordshire County Council	Main	112	Banbury Policy 8 – Land at Bolton Road The site is located in an area of archaeological potential with the medieval core of Banbury and immediately north of an area of the town where medieval deposits have been shown to survive. The site has been subject to a degree of disturbance by 20th Century development, however, important archaeological deposits related to the development of the town may survive within undisturbed areas of the site.	Amend the wording in the Key site specific design and place shaping principles section to include: <u>"An archaeological field evaluation to assess the impact of the development on archaeological features"</u>			
047/35	Matthew	Coyne	Banbury Town Council	Main	113					Site of proposed Banbury FC should be located within the boundaries of Banbury Town.
137/7	Theresa	Goss	Adderbury Parish Council	Main	113	This land is part of Manor Farm. Development here renders the green buffer ineffective and reduces Adderbury to an urban village coalesced with Banbury.	The green buffer should be retained for agricultural and biodiversity. The Parish Council would not want light pollution from close proximity to flood lighting.			
152/1	Roger	Wise	Bicester Town Football Club	Main	113					The Proposed Modifications relate to the relocation of Banbury United Football Club. Brackley Town Football Club have a long lease. Bicester Town Football Club is a community sports club with a long established history but does not have a facility. The Club should be relocated by the District Council.
166/10	Helen	Marshall	CPRE Oxfordshire	Main	113	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			The increase in overall housing numbers applied to the District as a whole (from 16,750 to 22,840) is even more exaggerated in the case of Bicester, which is supposed to increase its target by no less than 47% (6,894 to 10,129). CPRE is especially concerned over the downstream effects of increasingly rapid run off, which, with the growing intensity of rainfall events is unlikely to be properly mitigated by SUDS. And overall the inevitable major increase in road traffic stemming from all this development will result in a noticeable feeling of urbanisation in what is a predominantly rural district (SA para 1.137). The effect of setting such a target is addressed by the Sustainability Appraisal prepared by LUC. This states that too rapid and too large a scale of growth could (we would say will) place the services, facilities, and infrastructure of the town under (considerable) strain (SA para 1.74). The SA goes on to say that the cumulative effect of so much new housing will have a significant adverse effect through loss of greenfield and agricultural land, and is likely to have a similar adverse effect on air quality, biodiversity and landscape (SA para 1.136). Pressure on water resources and waste treatment will intensify (SA para 1.138).
047/36	Matthew	Coyne	Banbury Town Council	Main	114					Concern that further B8 warehousing which employs few and low skilled. All major housing sites with the exception of Higham are located to the west of the railway.
152/2	Roger	Wise	Bicester Town Football Club	Main	114					The Proposed Modifications relate to the relocation of Banbury United Football Club. Brackley Town Football Club have a long lease. Bicester Town Football Club is a community sports club with a long established history but does not have a facility. The Club should be relocated by the District Council.

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166/11	Helen	Marshall	CPRE Oxfordshire	Main	114	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			<p>The increase in overall housing numbers applied to the District as a whole (from 16,750 to 22,840) is even more exaggerated in the case of Bicester, which is supposed to increase its target by no less than 47% (6,894 to 10,129). CPRE is especially concerned over the downstream effects of increasingly rapid run off, which, with the growing intensity of rainfall events is unlikely to be properly mitigated by SUDS. And overall the inevitable major increase in road traffic stemming from all this development will result in a noticeable feeling of urbanisation in what is a predominantly rural district (SA para 1.137).</p> <p>The effect of setting such a target is addressed by the Sustainability Appraisal prepared by LUC. This states that too rapid and too large a scale of growth could (we would say will) place the services, facilities, and infrastructure of the town under (considerable) strain (SA para 1.74). The SA goes on to say that the cumulative effect of so much new housing will have a significant adverse effect through loss of greenfield and agricultural land, and is likely to have a similar adverse effect on air quality, biodiversity and landscape (SA para 1.136). Pressure on water resources and waste treatment will intensify (SA para 1.138).</p>
284/4	N	Porter	Banbury United Football Club	Main	114			The proposed relocation site for B.U.F.C. is supported as it would offer the club and the community excellent sporting facilities which are urgently needed. There are a lack of pitches and coaching facilities available which restricts participation in football. The site would enable coaching for all ages and abilities of boys and girls and encourage participation. BUFC have a project sub committee to progress the relocation including investigating funding, formulation of a football plan, the possibility of sharing with other sports clubs to fully utilise facilities and minimising environmental impact.		
313/5	Charles	Routh	Natural England	Main	114	Employment Land NE of Junction 11 (Banbury 15): We note that the specification has a number of potentially conflicting specifications. In particular, the site "provides an opportunity for high visibility economic investment", but should be subject to a Landscape and Visual Impact Assessment and a landscaping scheme to limit visual intrusion into the wider landscape. It is unlikely these will be compatible, and not clear which will take precedent. We thus advise that it is not clear that the policy is deliverable.				
301/77	Bev	Hindle	Oxfordshire County Council	Main	114	<p>Banbury 12 - Land for the Relocation of Banbury United FC Education - 8.42 hectares of land should be reserved within the site for a new secondary school of up to 1,200 places to meet town wide needs. In the event that the site is not required for education purposes, it could remain as playing fields.</p> <p>Minerals - Banbury 12 affects deposits of ironstone. However, it is not considered that there would be sufficient potential impact on possibly workable mineral resources to justify an objection on minerals sterilisation policy grounds.</p>	Amend policy wording accordingly			
106	Simon	Harris	Brown & Co / W.W. Stroud and Mark	Main	115					Site - Land to the East of Junction 11 M40 is part of the Banbury 15 allocation. The land extends to 49ha which is considered to be a suitable location for B1/B2 and B8 development. It is immediately deliverable within the planned period. There is a spirit of co-operation between the landowners and approaches have been made by developers known to CDC.
047/37	Matthew	Coyne	Banbury Town Council	Main	115					Concern that further B8 warehousing which employs few and low skilled. All major housing sites with the exception of Higham are located to the west of the railway.

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086/1	Robert	Thompson	White Commercial	Main	115					Confirmation of availability/deliverability BAN 15
089/1	Charlotte	Kinnear	RSPB	Main	115	<p>The Submission Local Plan does not address the green space needs of the new allocations or impact of allocations on green space. Development of new areas will increase the imbalance between the amount of development and the amount of green space for existing and new residents. This imbalance exists taking into account planned new green space, partly because the Green Spaces Strategy is out of date.</p> <p>The Local Plan fails to recognise that much of the green space identified, including playing fields and sports pitches, is of little value for wildlife.</p> <p>Banbury's ecological network is weak with no Local Nature Reserves or biological SSSIs and only one proposed Local Wildlife Site. Some existing Green Space, eg Salt Way, will be significantly affected by proposed allocations.</p> <p>Natural England recommends there should be one hectare of Local Nature Reserve provision for every 1,000 people.</p>	<p>Update Cherwell Green Spaces Strategy 2008-2016 to take account of proposed new allocations so that all up to date information is included as expected in the NPPF, paragraph 73 .</p> <p>The Local Plan should protect and increase semi-natural habitat in step with planned new development in accordance with the NPPF, paragraphs 109 and 114.</p> <p>Use up to date information from the Phase 1 habitat mapping CDC commissioned TVERC to carry out last year, to identify new areas to promote enhancement and management of Banbury's few areas of semi-natural habitat to create new areas of high quality natural green space to buffer existing sites of importance or to provide stepping stones between these. See enclosed map for suggested sites and areas that might form the basis for a more ambitious vision for the town's natural green space linked to new allocations.</p>		<p>Agree that the allocations will have a minor impact on biodiversity given that the locations are all currently managed as intensive farmland.</p> <p>The SA claim that there will be a minor positive effect on biodiversity from some of the proposed allocations is not a true reflection of the proposed allocations' impact on biodiversity or the delivery of a net gain in biodiversity. While the proposed allocations may not have an impact, it is inappropriate to say they have a positive impact compared to hypothetical alternative development elsewhere. Recommend that all the proposed allocations for which a minor positive impact is identified be reclassified as 'negligible effect likely'.</p>	
098/3	John	Braithwaite	South Newington Parish Council	Main	115	<p>References to the A361 and implication that it is a strategic route are unsound because the he Highway Authority and Oxfordshire County Council consider the A361 unsuitable as a long distance route for HGVs. In the County Council's publication 'Oxfordshire Lorry Routes' (February 2012) the A361 between Banbury and Burford is designated as a 'link to smaller towns'. South of Burford it is a local access road. Site 15 Banbury is therefore unsuitable as an employment site that would generate HGV traffic to or from the South, South West or West unless there are strictly enforceable movement plans requiring developers and users to avoid the A361.</p>	<p>Add to the policy a statement to the effect that 'HGV traffic to and from the site will not be permitted to use the A361 to the south of Banbury other than as a link to or from Chipping Norton and intermediate locations'.</p>			
116/4	Jack	Moeran	Environment Agency	Main	115	<p>The site has been included in the Sequential and Exception Test (Flooding) document (Aug 2014) however there is no mention of the site having passed the test. The policy is unsound until clarification is given that the site has passed the Sequential and Exceptions test.</p>	<p>Clarification is needed in the Sequential and Exception test document to state that the site has passed the test.</p>		No comment	
161/12	Martin	Small	English Heritage	Main	115					<p>English Heritage welcomes and supports the key site specific and place shaping principle in Proposed Policy Banbury 15: "An archaeological survey will be required due to close proximity to heritage assets", although we prefer the wording of the similar principle in Proposed Policy Bicester 13 "An archaeological investigation to inform an archaeological mitigation scheme as required.</p>

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166/12	Helen	Marshall	CPRE Oxfordshire	Main	115	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			<p>The increase in overall housing numbers applied to the District as a whole (from 16,750 to 22,840) is even more exaggerated in the case of Bicester, which is supposed to increase its target by no less than 47% (6,894 to 10,129). CPRE is especially concerned over the downstream effects of increasingly rapid run off, which, with the growing intensity of rainfall events is unlikely to be properly mitigated by SUDS. And overall the inevitable major increase in road traffic stemming from all this development will result in a noticeable feeling of urbanisation in what is a predominantly rural district (SA para 1.137).</p> <p>The effect of setting such a target is addressed by the Sustainability Appraisal prepared by LUC. This states that too rapid and too large a scale of growth could (we would say will) place the services, facilities, and infrastructure of the town under (considerable) strain (SA para 1.74). The SA goes on to say that the cumulative effect of so much new housing will have a significant adverse effect through loss of greenfield and agricultural land, and is likely to have a similar adverse effect on air quality, biodiversity and landscape (SA para 1.136). Pressure on water resources and waste treatment will intensify (SA para 1.138).</p>
241/1	Duncan	Chadwick	David Lock Associates / The Colegrave Family and Mrs Lyne Aries	Main	115	Support the principle and detail of the Proposed Modification incorporating Policy Banbury 15. The junction 11 site offers a suitable and sustainable location for employment development and is deliverable. The Policy is fundamentally sound but a small adjustment to the supporting plan is required to reflect the extent of the Banbury Flood Alleviation Scheme.	Adjustment to plan to reflect the extent of the Banbury Flood Alleviation Scheme. With the construction of an embankment as part of the Banbury Flood Alleviation Scheme, which is owned by the Environment Agency and affects the northern tip of Site 1 (our clients' land and the subject of these representations), we consider that this should be excluded from the Policy Banbury 15 and associated allocations Map. We therefore suggest that the Map included in the Proposed Modifications be amended to reflect the boundary shown on the drawing included with this representation (Appendix 2).	Minor amendments are required but the Policy and supporting evidence are fundamentally sound. Employment elements have been positively prepared to meet objectively assessed needs. The site is the most appropriate when assessed against reasonable alternatives. The land is deliverable and suitable and supported by joint working across administrative boundaries. The site is consistent with national policy and will lead to significant investment in the area including up 1,000 jobs on the client's land and about 3,500 in total.		
241/10	Duncan	Chadwick	David Lock Associates / The Colegrave Family and Mrs Lyne Aries	Main	115	Support the principle and detail of the Proposed Modification incorporating Policy Banbury 15. The junction 11 site offers a suitable and sustainable location for employment development and is deliverable. The Policy is fundamentally sound but some minor amendments are needed to the wording and structure of the policy. Key criteria and policy requirements that apply to the development of the site. These should be limited to those required to guide the development and should not necessarily seek to repeat other policy requirements with which the development would have to comply with in any case in the Local Plan.	<p>Suggested changes to policy (part 7):</p> <ul style="list-style-type: none"> • A comprehensive <u>and integrated</u> landscaping scheme, <u>including additional buffer planting to the M40 and A361, including on-site provision</u> to enhance the setting of buildings on-site and to limit visual intrusion into the wider landscape, particularly given the key views afforded into the site from higher ground <u>to the east in the wider vicinity;</u> • <u>include planting of vegetation along strategic route ways to screen the</u> (Comment: Planting is considered to have a minimal impact upon noise mitigation. Planting will be an integral element of the landscape scheme;) • Adequate investigation (through an <u>ecological s</u>urvey) treatment and management of protected habitats and species on-site to preserve and enhance biodiversity; • A high quality design and finish, with careful consideration given to layout, architecture, materials and colourings to reduce overall visual impact; • The height of buildings to reflect the scale of existing employment development in the vicinity; • Provision of public art to enhance the quality of the place, legibility and identity; 	Minor amendments are required but the Policy and supporting evidence are fundamentally sound. Employment elements have been positively prepared to meet objectively assessed needs. The site is the most appropriate when assessed against reasonable alternatives. The land is deliverable and suitable and supported by joint working across administrative boundaries. The site is consistent with national policy and will lead to significant investment in the area including up 1,000 jobs on the client's land and about 3,500 in total.		

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241/11	Duncan	Chadwick	David Lock Associates / The Colegrave Family and Mrs Lyne Aries	Main	115	Support the principle and detail of the Proposed Modification incorporating Policy Banbury 15. The junction 11 site offers a suitable and sustainable location for employment development and is deliverable. The Policy is fundamentally sound but some minor amendments are needed to the wording and structure of the policy. Key criteria and policy requirements that apply to the development of the site. These should be limited to those required to guide the development and should not necessarily seek to repeat other policy requirements with which the development would have to comply with in any case in the Local Plan.	Suggested changes to policy (part 8): <ul style="list-style-type: none"> An archaeological survey Undertaking of archaeological investigations will be required due to close proximity to heritage assets; Take account Consideration of the Council's Strategic Flood Risk Assessment for the site; Full mitigation of flood risk in compliance with Policy ESD 6: Sustainable Flood Risk Management including the use of SuDS (Policy ESD 7: Sustainable Drainage Systems (SuDS)), specifically attenuation SuDS techniques, taking account of the recommendations of the Council's Strategic Flood Risk Assessment; Adoption of a surface water management framework to reduce run off to greenfield rates (Comment: Will form part of the bullet point requirements above.) Demonstration of climate change mitigation and adaptation measures including demonstration of to compliance comply with the requirements of Policies ESD 1 – 5 of the Local Plan; An assessment of whether the site contains best and most versatile agricultural land, including a detailed survey where necessary. Preparation of an Agricultural Land Assessment. 	Minor amendments are required but the Policy and supporting evidence are fundamentally sound. Employment elements have been positively prepared to meet objectively assessed needs. The site is the most appropriate when assessed against reasonable alternatives. The land is deliverable and suitable and supported by joint working across administrative boundaries. The site is consistent with national policy and will lead to significant investment in the area including up 1,000 jobs on the client's land and about 3,500 in total.		
241/2	Duncan	Chadwick	David Lock Associates / The Colegrave Family and Mrs Lyne Aries	Main	115	Support the principle and detail of the Proposed Modification incorporating Policy Banbury 15. The junction 11 site offers a suitable and sustainable location for employment development and is deliverable. The Policy is fundamentally sound but some minor amendments are needed to the wording and structure of the policy. Key criteria and policy requirements that apply to the development of the site. These should be limited to those required to guide the development and should not necessarily seek to repeat other policy requirements with which the development would have to comply with in any case in the Local Plan.	To provide sufficient flexibility for the Policy area to be brought forward in response to market demand and enable the two components (east and west of the A361) to be pursued independently, if necessary, we suggest that a clear reference is made to Site 1 and Site 2 within the Policy. It is important that there is flexibility to enable the various components of the area to be delivered as the market requires, as appropriate. The 'Infrastructure Needs' the 'Key site specific design and place shaping principles' we consider that this list should be reviewed to strengthen the relevant principles and ensure that they are site specific and impose only policy requirements that are relevant to the proposed development, and therefore are compliant with the Community Infrastructure Levy Regulations 2010 (as amended).	Minor amendments are required but the Policy and supporting evidence are fundamentally sound. Employment elements have been positively prepared to meet objectively assessed needs. The site is the most appropriate when assessed against reasonable alternatives. The land is deliverable and suitable and supported by joint working across administrative boundaries. The site is consistent with national policy and will lead to significant investment in the area including up 1,000 jobs on the client's land and about 3,500 in total.		
241/3	Duncan	Chadwick	David Lock Associates / The Colegrave Family and Mrs Lyne Aries	Main	115	Support the principle and detail of the Proposed Modification incorporating Policy Banbury 15. The junction 11 site offers a suitable and sustainable location for employment development and is deliverable. The Policy is fundamentally sound but some minor amendments are needed to the wording and structure of the policy. Key criteria and policy requirements that apply to the development of the site. These should be limited to those required to guide the development and should not necessarily seek to repeat other policy requirements with which the development would have to comply with in any case in the Local Plan.	Suggested changes to supporting text: This strategic employment site in this highly prominent location adjoining the M40 motorway and close to Junction 11 is allocated for employment. This new employment site will ensure that the economic strengths of Banbury in manufacturing, high performance engineering and logistics can be maintained. The strategic road network and local distributor routes can be readily accessed from this area and be done so avoiding and will therefore restrict lorry movements through residential areas. Although an edge of town site, it is also within walking distance of the town centre and bus and railway stations. Development in this area provides an opportunity for high visibility to stimulate economic investment within a highly visible location that will be attractive to the market and investors and to he- bringing into effective use, land that would otherwise be unsuitable for residential purposes. For flexible employment generating uses.	Minor amendments are required but the Policy and supporting evidence are fundamentally sound. Employment elements have been positively prepared to meet objectively assessed needs. The site is the most appropriate when assessed against reasonable alternatives. The land is deliverable and suitable and supported by joint working across administrative boundaries. The site is consistent with national policy and will lead to significant investment in the area including up 1,000 jobs on the client's land and about 3,500 in total.		

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241/4	Duncan	Chadwick	David Lock Associates / The Colegrave Family and Mrs Lyne Aries	Main	115	Support the principle and detail of the Proposed Modification incorporating Policy Banbury 15. The junction 11 site offers a suitable and sustainable location for employment development and is deliverable. The Policy is fundamentally sound but some minor amendments are needed to the wording and structure of the policy. Key criteria and policy requirements that apply to the development of the site. These should be limited to those required to guide the development and should not necessarily seek to repeat other policy requirements with which the development would have to comply with in any case in the Local Plan.	Suggested changes to policy (part 1): Development Description: Located on the north eastern edge of Banbury in a <u>strategically</u> important position adjoining the M40 and the A361, this <u>strategic site employment growth location</u> combines two <u>related</u> parcels of land providing a <u>total</u> for of 49 hectares of mixed employment generating development. A variety of employment types will be sought to reflect the need for diversity and resilience in the local economy as expressed in the Economic Development Strategy.	Minor amendments are required but the Policy and supporting evidence are fundamentally sound. Employment elements have been positively prepared to meet objectively assessed needs. The site is the most appropriate when assessed against reasonable alternatives. The land is deliverable and suitable and supported by joint working across administrative boundaries. The site is consistent with national policy and will lead to significant investment in the area including up 1,000 jobs on the client's land and about 3,500 in total.		
241/5	Duncan	Chadwick	David Lock Associates / The Colegrave Family and Mrs Lyne Aries	Main	115	Support the principle and detail of the Proposed Modification incorporating Policy Banbury 15. The junction 11 site offers a suitable and sustainable location for employment development and is deliverable. The Policy is fundamentally sound but some minor amendments are needed to the wording and structure of the policy. Key criteria and policy requirements that apply to the development of the site. These should be limited to those required to guide the development and should not necessarily seek to repeat other policy requirements with which the development would have to comply with in any case in the Local Plan.	Suggested changes to policy (part 2): <u>Development under this policy will be delivered through the following two related sites:</u> <u>Site 1 – Land to the west of the A361 (approximately 13 hectares);</u> <u>Site 2 – Land to east of the A361 (approximately 36 hectares)</u> <u>The two sites will deliver integrated employment related development and can be phased to meet market demand.</u>	Minor amendments are required but the Policy and supporting evidence are fundamentally sound. Employment elements have been positively prepared to meet objectively assessed needs. The site is the most appropriate when assessed against reasonable alternatives. The land is deliverable and suitable and supported by joint working across administrative boundaries. The site is consistent with national policy and will lead to significant investment in the area including up 1,000 jobs on the client's land and about 3,500 in total.		
241/6	Duncan	Chadwick	David Lock Associates / The Colegrave Family and Mrs Lyne Aries	Main	115	Support the principle and detail of the Proposed Modification incorporating Policy Banbury 15. The junction 11 site offers a suitable and sustainable location for employment development and is deliverable. The Policy is fundamentally sound but some minor amendments are needed to the wording and structure of the policy. Key criteria and policy requirements that apply to the development of the site. These should be limited to those required to guide the development and should not necessarily seek to repeat other policy requirements with which the development would have to comply with in any case in the Local Plan.	Suggested changes to policy (part 3): Employment Jobs – approx – 3,500 Use classes – B1 (Office), B2 (General Industrial) and B8 (Storage and Distribution) <u>and other employment generating uses.</u>	Minor amendments are required but the Policy and supporting evidence are fundamentally sound. Employment elements have been positively prepared to meet objectively assessed needs. The site is the most appropriate when assessed against reasonable alternatives. The land is deliverable and suitable and supported by joint working across administrative boundaries. The site is consistent with national policy and will lead to significant investment in the area including up 1,000 jobs on the client's land and about 3,500 in total.		
241/7	Duncan	Chadwick	David Lock Associates / The Colegrave Family and Mrs Lyne Aries	Main	115	Support the principle and detail of the Proposed Modification incorporating Policy Banbury 15. The junction 11 site offers a suitable and sustainable location for employment development and is deliverable. The Policy is fundamentally sound but some minor amendments are needed to the wording and structure of the policy. Key criteria and policy requirements that apply to the development of the site. These should be limited to those required to guide the development and should not necessarily seek to repeat other policy requirements with which the development would have to comply with in any case in the Local Plan.	Suggested changes to policy (part 4): Infrastructure Needs Incidental <u>Open space – A supporting network of landscape improvements and green infrastructure will be provided to create an attractive landscape setting for the development and minimise the visual impact of the proposals.</u> Access and Movement – <u>access to both Site 1 and Site 2 will be achieved from the A361. The preparation of Transport Assessments for the proposed development will determine any other necessary contributions to other and / or additional local transport improvements will be sought that are required as a result of and to support the development and which comply with the Community Infrastructure Levy Regulations (2010) (as amended)....</u>	Minor amendments are required but the Policy and supporting evidence are fundamentally sound. Employment elements have been positively prepared to meet objectively assessed needs. The site is the most appropriate when assessed against reasonable alternatives. The land is deliverable and suitable and supported by joint working across administrative boundaries. The site is consistent with national policy and will lead to significant investment in the area including up 1,000 jobs on the client's land and about 3,500 in total.		

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241/7	Duncan	Chadwick	David Lock Associates / The Colegrave Family and Mrs Lyne Aries	Main	115	Support the principle and detail of the Proposed Modification incorporating Policy Banbury 15. The junction 11 site offers a suitable and sustainable location for employment development and is deliverable. The Policy is fundamentally sound but some minor amendments are needed to the wording and structure of the policy. Key criteria and policy requirements that apply to the development of the site. These should be limited to those required to guide the development and should not necessarily seek to repeat other policy requirements with which the development would have to comply with in any case in the Local Plan.	Cont.....This is likely to include; <ul style="list-style-type: none"> • measures to allow for walking and cycling <u>Provision of walking and cycling connections to facilitate effective linkages to other parts of the town and the town centre to the site which is currently relatively inaccessible.</u> • Changes Improvements to traffic management may be required including potential signalling at Junction 11 to allow the effective movement of traffic, <u>to be determined through future Transport Assessments.</u> 	Minor amendments are required but the Policy and supporting evidence are fundamentally sound. Employment elements have been positively prepared to meet objectively assessed needs. The site is the most appropriate when assessed against reasonable alternatives. The land is deliverable and suitable and supported by joint working across administrative boundaries. The site is consistent with national policy and will lead to significant investment in the area including up 1,000 jobs on the client's land and about 3,500 in total.		
241/8	Duncan	Chadwick	David Lock Associates / The Colegrave Family and Mrs Lyne Aries	Main	115	Support the principle and detail of the Proposed Modification incorporating Policy Banbury 15. The junction 11 site offers a suitable and sustainable location for employment development and is deliverable. The Policy is fundamentally sound but some minor amendments are needed to the wording and structure of the policy. Key criteria and policy requirements that apply to the development of the site. These should be limited to those required to guide the development and should not necessarily seek to repeat other policy requirements with which the development would have to comply with in any case in the Local Plan.	Suggested changes to policy (part 5): Key site specific design and place shaping principles <ul style="list-style-type: none"> • A high quality commercial district for the east of Banbury that has high connectivity to major transport routes and is well integrated with the adjacent neighbouring commercial uses; • Proposals should comply with Policy ESD16 <u>of the Local Plan</u>; • Layout of development that enables a high degree of integration and connectivity between new and existing development, including <u>between Site 1 and Site 2 and other adjoining neighbouring</u> employment areas, <u>whilst retaining a sensitive relationship to</u> nearby residential areas and the town centre; • Provision of new footpaths and cycleways <u>within the site</u> that <u>link connect</u> to existing networks <u>and provide wider to link linkages between</u> the site <u>with and</u> the Banbury urban area;..... 	Minor amendments are required but the Policy and supporting evidence are fundamentally sound. Employment elements have been positively prepared to meet objectively assessed needs. The site is the most appropriate when assessed against reasonable alternatives. The land is deliverable and suitable and supported by joint working across administrative boundaries. The site is consistent with national policy and will lead to significant investment in the area including up 1,000 jobs on the client's land and about 3,500 in total.		
241/8	Duncan	Chadwick	David Lock Associates / The Colegrave Family and Mrs Lyne Aries	Main	115	Support the principle and detail of the Proposed Modification incorporating Policy Banbury 15. The junction 11 site offers a suitable and sustainable location for employment development and is deliverable. The Policy is fundamentally sound but some minor amendments are needed to the wording and structure of the policy. Key criteria and policy requirements that apply to the development of the site. These should be limited to those required to guide the development and should not necessarily seek to repeat other policy requirements with which the development would have to comply with in any case in the Local Plan.	Cont..... <ul style="list-style-type: none"> • Protection of the amenity of the public footpath network including satisfactory treatment of existing footpaths on the site and diversion proposals where appropriate (comment: Not applicable due to no ProW within the site) • Good accessibility to <u>Consideration of public transport connections services should be provided for to help link the site with the Banbury urban area and provide an alternative to travel by car encourage sustainable modes of travel;</u> 	Minor amendments are required but the Policy and supporting evidence are fundamentally sound. Employment elements have been positively prepared to meet objectively assessed needs. The site is the most appropriate when assessed against reasonable alternatives. The land is deliverable and suitable and supported by joint working across administrative boundaries. The site is consistent with national policy and will lead to significant investment in the area including up 1,000 jobs on the client's land and about 3,500 in total.		
241/9	Duncan	Chadwick	David Lock Associates / The Colegrave Family and Mrs Lyne Aries	Main	115	Support the principle and detail of the Proposed Modification incorporating Policy Banbury 15. The junction 11 site offers a suitable and sustainable location for employment development and is deliverable. The Policy is fundamentally sound but some minor amendments are needed to the wording and structure of the policy. Key criteria and policy requirements that apply to the development of the site. These should be limited to those required to guide the development and should not necessarily seek to repeat other policy requirements with which the development would have to comply with in any case in the Local Plan.	Suggested changes to policy (part 6): <ul style="list-style-type: none"> • Satisfactory access arrangements including a <u>Preparation of detailed Transport assessment Assessment(s) and Travel Plan(s) to determine necessary transport improvements, and appropriate access arrangements and sustainable travel initiatives</u> given the location of the site close to the strategic road network; • A high quality, well designed approach <u>design approach</u> to create a new the urban edge which functions as an high profile economic attractor <u>emphasises this area as a prominent investment location but which also whilst achieving</u> a successful transition between town and country environments; • A Landscape and Visual Impact Assessment should be <u>undertaken as part of development proposals to determine any necessary mitigation measures;</u> • Development that respects the landscape setting <u>and</u> that <u>demonstrates contributes towards</u> the enhancement, restoration or creation of wildlife corridors, and the creation of a wider green infrastructure network for Banbury; • A Landscape and Visual Impact Assessment should be undertaken as part of development proposals 	Minor amendments are required but the Policy and supporting evidence are fundamentally sound. Employment elements have been positively prepared to meet objectively assessed needs. The site is the most appropriate when assessed against reasonable alternatives. The land is deliverable and suitable and supported by joint working across administrative boundaries. The site is consistent with national policy and will lead to significant investment in the area including up 1,000 jobs on the client's land and about 3,500 in total.		

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300/11	Penny	Silverwood	Berks, Bucks and Oxon Wildlife Trust (BBOWT)	Main	115		Reference should be made to priority habitats and species in bullet points 9 and 13 under Key site specific design and place shaping principles.			Support bullet points 9 (landscape setting) and 13 (ecological survey) under Key site specific design and place shaping principles.
302/5	David	Jackson	Savills	Main	115			Supported, insofar as additional employment allocation is identified at Banbury on land north east of Junction 11 of the M40. Given the very significant increase in the scale of housing allocations at Banbury, additional employment allocation for the town has been made even more compelling.	Welcome the analysis of the site contained in the SA Addendum. The SA identifies one significant adverse effect of the allocation and that is in relation to the loss of greenfield land. This is however an inevitable consequence of providing additional land for development at Banbury, given the lack of brownfield alternatives. The other adverse effects are assessed in the SA as being minor and are not considered to outweigh the benefits of allocating the site.	
301/78	Bev	Hindle	Oxfordshire County Council	Main	115	<p>Banbury 15: Employment Land NE of Junction 11</p> <p>The location of the site and the need to cross M40 Junction 11 means that walking opportunities to the site from the town centre will be limited. There is good opportunity however, to achieve a high level of public transport use for journeys to work; it is relatively well located for public transport, with three inter-urban buses per hour currently routed along the A361 between Banbury and Brackley and between Banbury and Daventry.</p> <p>A high proportion of public transport journeys to the site will mitigate against the effects of increased general traffic levels on the Banbury strategic road network.</p> <p>Under Infrastructure needs it states: "Access and Movement – Access to A361. Necessary contributions to other transport improvements will be sought. This is likely to include measures to allow for walking and cycling to the site which is currently relatively inaccessible. Changes to traffic management may be required including potential signalling at Junction 11 to allow the effective movement of traffic".</p> <p>Under Key site specific design and place shaping principles it states: "Layout of development that enables a high degree of integration and connectivity between new and existing development, including adjoining employment areas, nearby residential areas and the town centre".</p>	<p>Amend as follows: <u>"The location of the site and the need to cross M40 Junction 11 means that provision of walking opportunities to the site from the town centre will be challenging. There is good opportunity however, to achieve a high level of public transport use for journeys to work.</u> <u>The development should contribute towards and facilitate an increased frequency of bus service at peak times, also link these bus services to Banbury residential areas".</u> Delete text and replace with: <u>"Access and Movement – Access to A361 and M40 via Junction 11. Necessary contributions to other transport improvements will be sought, including improvements to bus services, walking and cycling routes. Contributions will also be required towards mitigation measures required to improve operation of Junction 11 (including a potential new link road) and Hennef Way junctions. This is likely to include measures to allow for walking and cycling to the site which is currently relatively inaccessible. Changes to traffic management may be required including potential signalling at Junction 11 to allow the effective movement of traffic"</u> </p>			
301/78	Bev	Hindle	Oxfordshire County Council	Main	115	<p>Banbury 15: Employment Land NE of Junction 11</p> <p>The location of the site and the need to cross M40 Junction 11 means that walking opportunities to the site from the town centre will be limited. There is good opportunity however, to achieve a high level of public transport use for journeys to work; it is relatively well located for public transport, with three inter-urban buses per hour currently routed along the A361 between Banbury and Brackley and between Banbury and Daventry.</p> <p>A high proportion of public transport journeys to the site will mitigate against the effects of increased general traffic levels on the Banbury strategic road network.</p> <p>Under Infrastructure needs it states: "Access and Movement – Access to A361. Necessary contributions to other transport improvements will be sought. This is likely to include measures to allow for walking and cycling to the site which is currently relatively inaccessible. Changes to traffic management may be required including potential signalling at Junction 11 to allow the effective movement of traffic".</p> <p>Under Key site specific design and place shaping principles it states: "Layout of development that enables a high degree of integration and connectivity between new and existing development, including adjoining employment areas, nearby residential areas and the town centre".</p>	<p>Cont....."Layout of development that enables a high degree of integration and connectivity between new and existing development, including adjoining employment areas, nearby residential areas and the town centre".</p>			

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047/38	Matthew	Coyne	Banbury Town Council	Main	116					Objection to the proposed allocation of new sites Banbury 16 and Banbury 17. Saltway forms a natural physical boundary, where residential development has been refused in the past. The area has high landscape value with good quality agricultural land. It includes Crouch Hill which overlooks Banbury and the site. It would result in coalescence with Bodicote. Development is likely a detrimental impact on Banbury's road network.
089/2	Charlotte	Kinnear	RSPB	Main	116	<p>The Submission Local Plan does not address the green space needs of the new allocations or impact of allocations on green space. Development of new areas will increase the imbalance between the amount of development and the amount of green space for existing and new residents. This imbalance exists taking into account planned new green space, partly because the Green Spaces Strategy is out of date.</p> <p>The Local Plan fails to recognise that much of the green space identified, including playing fields and sports pitches, is of little value for wildlife.</p> <p>Banbury's ecological network is weak with no Local Nature Reserves or biological SSSIs and only one proposed Local Wildlife Site. Some existing Green Space, eg Salt Way, will be significantly affected by proposed allocations.</p> <p>Natural England recommends there should be one hectare of Local Nature Reserve provision for every 1,000 people.</p>	<p>Update Cherwell Green Spaces Strategy 2008-2016 to take account of proposed new allocations so that all up to date information is included as expected in the NPPF, paragraph 73.</p> <p>The Local Plan should protect and increase semi-natural habitat in step with planned new development in accordance with the NPPF, paragraphs 109 and 114.</p> <p>Use up to date information from the Phase 1 habitat mapping CDC commissioned TVERC to carry out last year, to identify new areas to promote enhancement and management of Banbury's few areas of semi-natural habitat to create new areas of high quality natural green space to buffer existing sites of importance or to provide stepping stones between these. See enclosed map for suggested sites and areas that might form the basis for a more ambitious vision for the town's natural green space linked to new allocations.</p>		<p>Agree that the allocations will have a minor impact on biodiversity given that the locations are all currently managed as intensive farmland.</p> <p>The SA claim that there will be a minor positive effect on biodiversity from some of the proposed allocations is not a true reflection of the proposed allocations' impact on biodiversity or the delivery of a net gain in biodiversity. While the proposed allocations may not have an impact, it is inappropriate to say they have a positive impact compared to hypothetical alternative development elsewhere. Recommend that all the proposed allocations for which a minor positive impact is identified be reclassified as 'negligible effect likely'.</p>	
107/1	Steven	Sensecall	Kemp & Kemp LLP / Tudor Hall School	Main	116					Tudor Hall School ("the School") is located immediately to the south of the proposed strategic development area known as South West Banbury. The School recognises the need for new housing in Cherwell but has real concerns about the landscape and traffic/highway safety impacts of this proposed development.
164/5	Sarah	Smith	Rapleys LLP / Pandora Trading Ltd	Main	116	<p>Through the allocation of Banbury 16,17 and 18 and their removal from the green buffer it is clear that:</p> <ol style="list-style-type: none"> 1. Areas of attractive countryside which form the setting to Banbury (as evidenced in Inquiry Core Document ENV03) are now proposed for development; 2. Ridgelines containing the town (as evidenced in ENV03) are now proposed to be breached by development, notably Banbury 18; 3. Areas which fulfilled the green buffer criteria (evidenced in ENV04) are now proposed for development despite the adverse impacts on setting and coalescence; 4. There is a lack of consistency and transparency in the approach which has been taken. For example, Banbury 16 and Banbury 17 would reduce the gap between Banbury and Bodicote to 200m, whereas the extension of the green buffer over Banbury 2 would result in a separation of over 1,000m between Banbury and Hanwell; 5. The green buffer evidence base has clearly been set aside; 6. CDC has been very selective in terms of its use of and reliance on all of the landscape related evidence base; 	<p>The allocations of Banbury 16,17,and 18 should be deleted and the green buffer designation should be re-instated across their extent.</p>		<p>Not in respect of these stated modifications. Comments are provided on the Sustainability Appraisal in a separate representation.</p>	<p>Concerns over the sustainability and, importantly, the deliverability of Banbury 16, 17 and 18 raises serious questions about the robustness of the allocation of these particular sites.</p>
166/13	Helen	Marshall	CPRE Oxfordshire	Main	116	<p>CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.</p>	<p>The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.</p>			<p>The increase in overall housing numbers applied to the District as a whole (from 16,750 to 22,840) is even more exaggerated in the case of Bicester, which is supposed to increase its target by no less than 47% (6,894 to 10,129). CPRE is especially concerned over the downstream effects of increasingly rapid run off, which, with the growing intensity of rainfall events is unlikely to be properly mitigated by SUDS. And overall the inevitable major increase in road traffic stemming from all this development will result in a noticeable feeling of urbanisation in what is a predominantly rural district (SA para 1.137).</p> <p>The effect of setting such a target is addressed by the Sustainability Appraisal prepared by LUC. This states that too</p>

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175/6	Mike	Pollard	Banbury Ornithological Society	Main	116		Seek to establish a local nature reserve within or close to the development. This should be at least 3ha in extent, following Natural England guidance. Local BAP priority habitat should be prioritised. This to ensure net gain in biodiversity following loss of extensive green field land. Salt Way to be buffered by a 25-50m strip of semi-natural grassland habitat to ensure heritage value fully protected.	We support the need for a Masterplan for these developments and would like to contribute local knowledge of biodiversity value and potential value.		concerned that the proposed 10-20m buffer along the Salt Way will not create an effective buffer strip to protect the heritage value (natural and historic) from the adjoining development. Would think a 25m-50m buffer strip would be more effective.. Due to the scale of this development it is important that areas of semi-natural habitat are established that are accessible to people living in the area.
217/3	Nick	Freer	David Lock Associates / Gallagher Estates and John Colegrave	Main	116		Revise the text introduction to the first and last paragraphs: "The development Area known as Banbury South West comprises four a number of adjoining development sites which will, collectively, deliver up to 1,495 dwellings in....." " Each individual development site is supported by its own Separate site-specific policies for development east and west of the A361 Bloxham Road that sets out the necessary infrastructure required for each that specific development to provide the necessary confidence regarding the relationship between each....."	Strongly supports the allocation at Wykham Park Farm which comprises the substantial part of South West Banbury (Banbury 17). The allocation responds to the increased housing targets from the SHMA. Technical work undertaken by the Council and that on behalf of Gallagher Homes confirms that the site is not constrained in landscape terms. The site has no significant ecological issues. Request a number of minor amendments to the current text introduction so that the policy is internally consistent.	Support the conclusions of the SA Addendum that reports land at Wykham Park Farm to be a reasonable alternative to deliver strategic development to help meet the housing needs identified in the SHMA.	
251/10	Heather	Vickers	Planning Potential / Gleeson Developments Ltd	Main	116	The inclusion of Banbury 16 and 17, are inconsistent with the Council's evidence base. There has been no assessment of reasonable alternatives (i.e. additional required housing sites) within the Council's recently prepared evidence base (White Young Green Reports 2014) The inclusion of Crouch Hill as an important historical and topographical landscape landmark is not justified. Proposed allocations entirely inconsistent with findings of 4.6 of Green Buffer Report (Sept.2013) which clearly identifies importance of conserving countryside south of Salt Way where there is a 'strong rural character' with 'fields integral to the setting of the route' of Salt Way.	Addition of further strategic development sites within Banbury to meet the Council's objectively assessed housing need, which will increase the figure stated within Modification 116. This section of the Plan should include an additional Banbury Policy 20: Land North East of Crouch Hill Farm Adjoining Broughton Road. References to the importance of Crouch Hill must be justified by a robust evidence base, which does not currently exist. Reference to its importance should therefore be deleted from Modification 117. Reference to the visual impacts on Crouch Hill contradicts the deletion of paragraph C.124 (Modification 93) and therefore should be amended within Modification 117, albeit, if retained, should simply refer to the setting of Crouch Hill as a 'landscape feature'. Modification 118 and 120 includes repetition of a number of points (bulleted lists – Key Site Specific Design and Place Shaping Principles) – this should be reviewed and amended to ensure points are only made once.			
300/12	Penny	Silverwood	Berks, Bucks and Oxon Wildlife Trust (BBOWT)	Main	116					Support the third paragraph.
309/1	Tony	Roberts		Main	116	The present government stated they wanted to protect precious Green Belt and move all developments to existing brown belt land. Banbury has a lot of these, including the old Alcan site now that Prodrive are not going to use this and the old Upper Heyford space. I suggest that major developments like this should be concentrated on these. A major problem for the Salt Way proposals is appalling infrastructure. There are major problems being experienced as the Bankside development progresses, at Oxford and Bloxham roads junction especially at busy times, we will end up with gridlock. Another development on a bigger scale than Bankside would be a disaster for the area. Accept we need affordable housing but noone I know can afford these prices, in particular first time buyers, and I understand sales have slowed down. Land around Salt Way is prime agricultural land and due to the fact that this country needs to grow more food should remain so. Countryside people enjoy would be lost forever. Banbury has few companies offering well paid secure jobs, is losing decent jobs (loss of Alcan and the shrinking of the old General Foods) and gaining low paid zero hour contract employment. It will turn into a "dormitory town" with people needing to use the motorway to travel to work and shop (look at what's happened to Castle Quay and the market.) Large scale development should be on the motorway side of the town i.e. Hanwell Fields etc.	Put together a sustainable plan that does not destroy the area and respects the ecology and poor road infrastructure that we have.			The latest announcement from Eric Pickles makes it clear that these proposals should be rejected and brown field chosen. "Mr Pickles told The Daily Telegraph: "Protecting our Green Belt must be paramount. Local people don't want to lose their countryside to urban sprawl, or see the vital green lungs around their towns and cities to unnecessary development. "The guidance will ensure councils at the heart of the reformed planning system, so councils and local people can now decide where development should - and shouldn't - go." Specifically the new guidance makes clear that councils do not have to build on the Green Belt just to meet the locally set five-year housing targets. Councils will have to "take account of any constraints such as Green Belt which indicate that development should be restricted and which may restrain the ability of an authority to meet its need", it says. "
061/32	Alan	Lodwick		Main	116	Objects to the use of the SHMA figures to inform the Local Plan.	All Modifications relating to the SHMA should be deleted.			

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301/79	Bev	Hindle	Oxfordshire County Council	Main	116	<p>Policy Banbury 16 – South of Salt Way- west</p> <p>Education - It is stated that “contributions may be sought towards provision of secondary school places”.</p> <p>Archaeology - The site is located in an area of archaeological potential with a number of Iron Age and Roman sites recorded in the vicinity. However a geophysical survey has been undertaken on the site which did not record any anomalies of potential archaeological origin. Further archaeological investigations will be required to identify if any archaeological features do survive on the site.</p> <p>Ecology - The Salt Way Proposed Local Wildlife Site lies between this proposed site and the existing edge of the built up area. Proposed Local Wildlife Sites should be given the same status in planning as designated Local Wildlife Sites. The site and neighbouring area also have records of protected and notable species.</p> <p>Public transport - It states: “...provision of a bus route through the site and new bus stops on the site”. However, the South of Salt Way West site is too small to require an internal bus route. An internal bus route would only be required if this site was expanded, so walking distances to bus stops exceed 500m.</p>	<p>This should be amended to say that “contributions will be sought towards provision of secondary school places”</p> <p>Amend the wording in the Key site specific design and place shaping principles section to include: “An archaeological field evaluation to assess the impact of the development on archaeological features”</p> <p>The District Council should seek advice from their ecologist to ensure that all impacts on the proposed LWS and protected and notable species. Delete: “...provision of a bus route through the site and new bus stops on the site”.</p> <p>The text should be amended to state that: <u>Bus stops should be provided on Bloxham Road, with good walking routes. The developers will be required to contribute towards the cost of improved public transport in the Bloxham area.</u></p>			
089/3	Charlotte	Kinnear	RSPB	Main	117	<p>The Submission Local Plan does not address the green space needs of the new allocations or impact of allocations on green space.</p> <p>Development of new areas will increase the imbalance between the amount of development and the amount of green space for existing and new residents. This imbalance exists taking into account planned new green space, partly because the Green Spaces Strategy is out of date.</p> <p>The Local Plan fails to recognise that much of the green space identified, including playing fields and sports pitches, is of little value for wildlife.</p> <p>Banbury's ecological network is weak with no Local Nature Reserves or biological SSSIs and only one proposed Local Wildlife Site. Some existing Green Space, eg Salt Way, will be significantly affected by proposed allocations.</p> <p>Natural England recommends there should be one hectare of Local Nature Reserve provision for every 1,000 people.</p>	<p>Update Cherwell Green Spaces Strategy 2008-2016 to take account of proposed new allocations so that all up to date information is included as expected in the NPPF, paragraph 73 .</p> <p>The Local Plan should protect and increase semi-natural habitat in step with planned new development in accordance with the NPPF, paragraphs 109 and 114.</p> <p>Use up to date information from the Phase 1 habitat mapping CDC commissioned TVERC to carry out last year, to identify new areas to promote enhancement and management of Banbury's few areas of semi-natural habitat to create new areas of high quality natural green space to buffer existing sites of importance or to provide stepping stones between these. See enclosed map for suggested sites and areas that might form the basis for a more ambitious vision for the town's natural green space linked to new allocations.</p>		<p>Agree that the allocations will have a minor impact on biodiversity given that the locations are all currently managed as intensive farmland.</p> <p>The SA claim that there will be a minor positive effect on biodiversity from some of the proposed allocations is not a true reflection of the proposed allocations' impact on biodiversity or the delivery of a net gain in biodiversity. While the proposed allocations may not have an impact, it is inappropriate to say they have a positive impact compared to hypothetical alternative development elsewhere. Recommend that all the proposed allocations for which a minor positive impact is identified be reclassified as 'negligible effect likely'.</p>	
161/13	Martin	Small	English Heritage	Main	117					English Heritage welcomes the recognition of the historical significance of Salt Way, Crouch Farm, Wykham Park Farm and Crouch Hill in the Proposed supporting text to Proposed Policy Banbury 16.
164/6	Sarah	Smith	Rapleys LLP / Pandora Trading Ltd	Main	117	<p>Through the allocation of Banbury 16,17 and 18 and their removal from the green buffer it is clear that:</p> <ol style="list-style-type: none"> 1. Areas of attractive countryside which form the setting to Banbury (as evidenced in Inquiry Core Document ENV03) are now proposed for development; 2. Ridgelines containing the town (as evidenced in ENV03) are now proposed to be breached by development, notably Banbury 18; 3. Areas which fulfilled the green buffer criteria (evidenced in ENV04) are now proposed for development despite the adverse impacts on setting and coalescence; 4. There is a lack of consistency and transparency in the approach which has been taken. For example, Banbury 16 and Banbury 17 would reduce the gap between Banbury and Bodicote to 200m, whereas the extension of the green buffer over Banbury 2 would result in a separation of over 1,000m between Banbury and Hanwell; 5. The green buffer evidence base has clearly been set aside; 6. CDC has been very selective in terms of its use of and reliance on all of the landscape related evidence base; 	<p>The allocations of Banbury 16,17,and 18 should be deleted and the green buffer designation should be re-instated across their extent.</p>		<p>Not in respect of these stated modifications. Comments are provided on the Sustainability Appraisal in a separate representation.</p>	<p>Concerns over the sustainability and, importantly, the deliverability of Banbury 16, 17 and 18 raises serious questions about the robustness of the allocation of these particular sites.</p>

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166/14	Helen	Marshall	CPRE Oxfordshire	Main	117	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			<p>The increase in overall housing numbers applied to the District as a whole (from 16,750 to 22,840) is even more exaggerated in the case of Bicester, which is supposed to increase its target by no less than 47% (6,894 to 10,129). CPRE is especially concerned over the downstream effects of increasingly rapid run off, which, with the growing intensity of rainfall events is unlikely to be properly mitigated by SUDS. And overall the inevitable major increase in road traffic stemming from all this development will result in a noticeable feeling of urbanisation in what is a predominantly rural district (SA para 1.137).</p> <p>The effect of setting such a target is addressed by the Sustainability Appraisal prepared by LUC. This states that too rapid and too large a scale of growth could (we would say will) place the services, facilities, and infrastructure of the town under (considerable) strain (SA para 1.74). The SA goes on to say that the cumulative effect of so much new housing will have a significant adverse effect through loss of greenfield and agricultural land, and is likely to have a similar adverse effect on air quality, biodiversity and landscape (SA para 1.136). Pressure on water resources and waste treatment will intensify (SA para 1.138).</p>
251/11	Heather	Vickers	Planning Potential / Gleeson Developments Ltd	Main	117	<p>The inclusion of Banbury 16 and 17, are inconsistent with the Council's evidence base. There has been no assessment of reasonable alternatives (i.e. additional required housing sites) within the Council's recently prepared evidence base (White Young Green Reports 2014)</p> <p>The inclusion of Crouch Hill as an important historical and topographical landscape landmark is not justified.</p> <p>Proposed allocations entirely inconsistent with findings of 4.6 of Green Buffer Report (Sept.2013) which clearly identifies importance of conserving countryside south of Salt Way where there is a 'strong rural character' with 'fields integral to the setting of the route' of Salt Way.</p>	<p>Addition of further strategic development sites within Banbury to meet the Council's objectively assessed housing need, which will increase the figure stated within Modification 116. This section of the Plan should include an additional Banbury Policy 20: Land North East of Crouch Hill Farm Adjoining Broughton Road. References to the importance of Crouch Hill must be justified by a robust evidence base, which does not currently exist. Reference to its importance should therefore be deleted from Modification 117.</p> <p>Reference to the visual impacts on Crouch Hill contradicts the deletion of paragraph C.124 (Modification 93) and therefore should be amended within Modification 117, albeit, if retained, should simply refer to the setting of Crouch Hill as a 'landscape feature'. Modification 118 and 120 includes repetition of a number of points (bulleted lists – Key Site Specific Design and Place Shaping Principles) – this should be reviewed and amended to ensure points are only made once.</p>			
269/1	David	Jackson	Savills / Barwood Strategic Land II LLP and Mr M Horgan	Main	117	The evidence base is flawed in relation to policy Banbury 16, South of Salt Way -West. The submission attaches a Design and Access Statement (July 2014) and Findings of Landscape and Visual Impact Assessment (EDP, July 2014) which they contend presents the most accurate and comprehensive assessment carried out and supersedes the more broad brush landscape assessment that informed the proposed modifications and concludes that a development of 400 homes is acceptable.	The boundary of site Banbury 16, south of Salt Way West, should be amended in accordance with the documents submitted by the objector.			Reference is made to the submitted planning application and supporting documents for a larger site in this location, which are considered to be a more robust evidence base than that used to inform the modifications to the plan, being prepared specifically for the site, and in much greater detail. This evidence was not available to inform the preparation of the proposed modifications. Reference is made to the identification of the site in the Options for Growth paper in 2008, as a reasonable option for major development. The Plan does not include for any homes that will be needed in agreement with Oxford City in relation to Oxford's unmet needs and the current housing levels should be treated as a minimum. Any site capable of accommodating additional housing should be included unless there is strong evidence that development would cause significant harm. Reference is made to pre-application discussions and progress on the planning application.

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047/39	Matthew	Coyne	Banbury Town Council	Main	118					Objection to the proposed allocation of new sites Banbury 16 and Banbury 17. Saltway forms a natural physical boundary, where residential development has been refused in the past. The area has high landscape value with good quality agricultural land. It includes Crouch Hill which overlooks Banbury and the site. It would result in coalescence with Bodicote. Development is likely a detrimental impact on Banbury's road network.
089/4	Charlotte	Kinnear	RSPB	Main	118	<p>The Submission Local Plan does not address the green space needs of the new allocations or impact of allocations on green space. Development of new areas will increase the imbalance between the amount of development and the amount of green space for existing and new residents. This imbalance exists taking into account planned new green space, partly because the Green Spaces Strategy is out of date.</p> <p>The Local Plan fails to recognise that much of the green space identified, including playing fields and sports pitches, is of little value for wildlife.</p> <p>Banbury's ecological network is weak with no Local Nature Reserves or biological SSSIs and only one proposed Local Wildlife Site. Some existing Green Space, eg Salt Way, will be significantly affected by proposed allocations.</p> <p>Natural England recommends there should be one hectare of Local Nature Reserve provision for every 1,000 people.</p>	<p>Update Cherwell Green Spaces Strategy 2008-2016 to take account of proposed new allocations so that all up to date information is included as expected in the NPPF, paragraph 73.</p> <p>The Local Plan should protect and increase semi-natural habitat in step with planned new development in accordance with the NPPF, paragraphs 109 and 114.</p> <p>Use up to date information from the Phase 1 habitat mapping CDC commissioned TVERC to carry out last year, to identify new areas to promote enhancement and management of Banbury's few areas of semi-natural habitat to create new areas of high quality natural green space to buffer existing sites of importance or to provide stepping stones between these. See enclosed map for suggested sites and areas that might form the basis for a more ambitious vision for the town's natural green space linked to new allocations.</p>		<p>Agree that the allocations will have a minor impact on biodiversity given that the locations are all currently managed as intensive farmland.</p> <p>The SA claim that there will be a minor positive effect on biodiversity from some of the proposed allocations is not a true reflection of the proposed allocations' impact on biodiversity or the delivery of a net gain in biodiversity. While the proposed allocations may not have an impact, it is inappropriate to say they have a positive impact compared to hypothetical alternative development elsewhere. Recommend that all the proposed allocations for which a minor positive impact is identified be reclassified as 'negligible effect likely'.</p>	
161/14	Martin	Small	English Heritage	Main	118		A new key site specific and place shaping principle should be added to Proposed Policy Banbury 16: "An archaeological investigation to inform an archaeological mitigation scheme as required"			Paragraph 126 of the National Planning Policy Framework requires local planning authorities to recognise, in their Local Plans, that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. Proposed Main Modification 117 recognises the archaeological potential of the land south of Salt Way – West but there is no reference to this potential interest in Policy Banbury 16. The Policy as drafted fails to provide adequate protection to archaeological significance.
164/7	Sarah	Smith	Rapleys LLP / Pandora Trading Ltd	Main	118	<p>Through the allocation of Banbury 16,17 and 18 and their removal from the green buffer it is clear that:</p> <ol style="list-style-type: none"> 1. Areas of attractive countryside which form the setting to Banbury (as evidenced in Inquiry Core Document ENV03) are now proposed for development; 2. Ridgelines containing the town (as evidenced in ENV03) are now proposed to be breached by development, notably Banbury 18; 3. Areas which fulfilled the green buffer criteria (evidenced in ENV04) are now proposed for development despite the adverse impacts on setting and coalescence; 4. There is a lack of consistency and transparency in the approach which has been taken. For example, Banbury 16 and Banbury 17 would reduce the gap between Banbury and Bodicote to 200m, whereas the extension of the green buffer over Banbury 2 would result in a separation of over 1,000m between Banbury and Hanwell; 5. The green buffer evidence base has clearly been set aside; 6. CDC has been very selective in terms of its use of and reliance on all of the landscape related evidence base; 	The allocations of Banbury 16,17, and 18 should be deleted and the green buffer designation should be re-instated across their extent.		Not in respect of these stated modifications. Comments are provided on the Sustainability Appraisal in a separate representation.	Concerns over the sustainability and, importantly, the deliverability of Banbury 16, 17 and 18 raises serious questions about the robustness of the allocation of these particular sites.

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166/15	Helen	Marshall	CPRE Oxfordshire	Main	118	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			<p>The increase in overall housing numbers applied to the District as a whole (from 16,750 to 22,840) is even more exaggerated in the case of Bicester, which is supposed to increase its target by no less than 47% (6,894 to 10,129). CPRE is especially concerned over the downstream effects of increasingly rapid run off, which, with the growing intensity of rainfall events is unlikely to be properly mitigated by SUDS. And overall the inevitable major increase in road traffic stemming from all this development will result in a noticeable feeling of urbanisation in what is a predominantly rural district (SA para 1.137).</p> <p>The effect of setting such a target is addressed by the Sustainability Appraisal prepared by LUC. This states that too rapid and too large a scale of growth could (we would say will) place the services, facilities, and infrastructure of the town under (considerable) strain (SA para 1.74). The SA goes on to say that the cumulative effect of so much new housing will have a significant adverse effect through loss of greenfield and agricultural land, and is likely to have a similar adverse effect on air quality, biodiversity and landscape (SA para 1.136). Pressure on water resources and waste treatment will intensify (SA para 1.138).</p>
186/13	Rob	Kinchin-Smith	Banbury Civic Society	Main	118					Banbury Civic Society (and many others, including the council) have consistently resisted the allocation of this site. However if this site is needed the place shaping principles contained are supported.
251/12	Heather	Vickers	Planning Potential / Gleeson Developments Ltd	Main	118	<p>The inclusion of Banbury 16 and 17, are inconsistent with the Council's evidence base. There has been no assessment of reasonable alternatives (i.e. additional required housing sites) within the Council's recently prepared evidence base (White Young Green Reports 2014)</p> <p>The inclusion of Crouch Hill as an important historical and topographical landscape landmark is not justified.</p> <p>Proposed allocations entirely inconsistent with findings of 4.6 of Green Buffer Report (Sept.2013) which clearly identifies importance of conserving countryside south of Salt Way where there is a 'strong rural character' with 'fields integral to the setting of the route' of Salt Way.</p>	<p>Addition of further strategic development sites within Banbury to meet the Council's objectively assessed housing need, which will increase the figure stated within Modification 116. This section of the Plan should include an additional Banbury Policy 20: Land North East of Crouch Hill Farm Adjoining Broughton Road. References to the importance of Crouch Hill must be justified by a robust evidence base, which does not currently exist. Reference to its importance should therefore be deleted from Modification 117.</p> <p>Reference to the visual impacts on Crouch Hill contradicts the deletion of paragraph C.124 (Modification 93) and therefore should be amended within Modification 117, albeit, if retained, should simply refer to the setting of Crouch Hill as a 'landscape feature'. Modification 118 and 120 includes repetition of a number of points (bulleted lists – Key Site Specific Design and Place Shaping Principles) – this should be reviewed and amended to ensure points are only made once.</p>			
254/11	Mark	Mathews	Thames Water	Main	118					Thames Water has no comments to make on the main modifications or IDP text. The supply and wastewater networks are unlikely to be able to support the demand anticipated from South of Salt Way East. Infrastructure is likely to be required. Water supply and drainage strategies would be required from the developer. If upgrading is required there could be a delay of up to 3 years for delivery unless the developer requisitions the infrastructure.

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282/1	Michael	Spiers		Main	118	The proposed development would intrude into the green buffer and seriously affect the setting and amenity of Crouch Cottages, and have an adverse visual impact. Banbury 17 is more appropriate, providing infrastructure including the realignment of Bloxham Road and an east west spine road, which will release pressure from the A361. The report by URS only identifies a small portion of land suitable for development. There is a risk of flooding and the proposal will exacerbate existing surface and groundwater problems.	Amend the site boundary by aligning the development boundary away from Crouch Cottages and the access to Crouch Farm, to the public footpath opposite the entrance to Wykham Park Farm. Move the western boundary further west which would not unduly affect the setting of Crouch Farm, which is protected by mature trees/hedges. Planting along the amended southern boundary could then align with the northern part of existing woodland to preserve the amenity of Crouch Cottages and maintain the rural character of the western edge of Bloxham Road. 2. Insert "and Crouch Cottages" after Crouch Hill in Banbury 16, Key Site Specific Design and Place Shaping Principles, bullet point 9. In the bullet point beginning "Full mitigation of flood risk.." add "in addition to the mitigation of location specific flood risk issues for Crouch Cottages" 3. The Local Plan should provide for consultation with residents of Crouch Cottages prior to detailed planning applications being submitted.			
300/13	Penny	Silverwood	Berks, Bucks and Oxon Wildlife Trust (BBOWT)	Main	118		The policy should include reference to the Green Infrastructure links being designed to incorporate biodiversity enhancements and connectivity of ecological networks in line with NPPF.			Support bullet point 19 (Green Infrastructure) and 21 (ecological impacts) under Key site specific design and place shaping principles.
047/40	Matthew	Coyne	Banbury Town Council	Main	119					Objection to the proposed allocation of new sites Banbury 16 and Banbury 17. Saltway forms a natural physical boundary, where residential development has been refused in the past. The area has high landscape value with good quality agricultural land. It includes Crouch Hill which overlooks Banbury and the site. It would result in coalescence with Bodicote. Development is likely a detrimental impact on Banbury's road network.
089/5	Charlotte	Kinnear	RSPB	Main	119	The Submission Local Plan does not address the green space needs of the new allocations or impact of allocations on green space. Development of new areas will increase the imbalance between the amount of development and the amount of green space for existing and new residents. This imbalance exists taking into account planned new green space, partly because the Green Spaces Strategy is out of date. The Local Plan fails to recognise that much of the green space identified, including playing fields and sports pitches, is of little value for wildlife. Banbury's ecological network is weak with no Local Nature Reserves or biological SSSIs and only one proposed Local Wildlife Site. Some existing Green Space, eg Salt Way, will be significantly affected by proposed allocations. Natural England recommends there should be one hectare of Local Nature Reserve provision for every 1,000 people.	Update Cherwell Green Spaces Strategy 2008-2016 to take account of proposed new allocations so that all up to date information is included as expected in the NPPF, paragraph 73 . The Local Plan should protect and increase semi-natural habitat in step with planned new development in accordance with the NPPF, paragraphs 109 and 114. Use up to date information from the Phase 1 habitat mapping CDC commissioned TVERC to carry out last year, to identify new areas to promote enhancement and management of Banbury's few areas of semi-natural habitat to create new areas of high quality natural green space to buffer existing sites of importance or to provide stepping stones between these. See enclosed map for suggested sites and areas that might form the basis for a more ambitious vision for the town's natural green space linked to new allocations.		Agree that the allocations will have a minor impact on biodiversity given that the locations are all currently managed as intensive farmland. The SA claim that there will be a minor positive effect on biodiversity from some of the proposed allocations is not a true reflection of the proposed allocations' impact on biodiversity or the delivery of a net gain in biodiversity. While the proposed allocations may not have an impact, it is inappropriate to say they have a positive impact compared to hypothetical alternative development elsewhere. Recommend that all the proposed allocations for which a minor positive impact is identified be reclassified as 'negligible effect likely'.	

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107/2	Steven	Sensecall	Kemp & Kemp LLP / Tudor Hall School	Main	119		Request that the site's sensitivity in landscape terms is acknowledged explicitly in the proposed policy. The School would also request an explicit reference in the text of the policy to the sensitivity of the south-western extent of the proposed allocation (marked on the attached plan) and confirmation that a) it will be kept free from built development and b) its "pastoral, rural estate landscape character" will be retained.			The School is concerned that there is no mention of the landscape sensitivity of the broader site the subject of the proposed allocation. References to the Cherwell's Local Plan Submission Sustainability Appraisal Report (December 2013), the Banbury Analysis of Potential for Strategic Development (2013), Banbury Landscape Sensitivity and Capacity Assessment (2013), the Design and Access Statement to a recent planning application and Cherwell's Sustainability Appraisal Addendum for the Main Modifications were made to highlight the landscape sensitivity of the area. The School's view is that the sensitivity of the landscape is such as to raise serious question marks as to the appropriateness of this proposed allocation.
161/15	Martin	Small	English Heritage	Main	119					English Heritage welcomes the references to Salt Way being a non-designated heritage asset and to the character of Bodicote Conservation Area being protected in the Proposed supporting text for Proposed Policy Banbury 17.
162/1	Val	Russell	Bodicote parish council	Main	119					Object to the removal of the site from the proposed green buffer and its allocation for housing. Land at Cotefield Farm to the south of Bodicote has planning permission for 100 dwellings. This area is not shaded pink for development, as it should be. There have also been discussions as these 2 sites are in Bodicote Parish, suggest these homes are "swapped" for the homes proposed in "Banbury 17". There should be no more housing developments in the Parish – this is contrary to CDC's own rules for a Category 1 village, where only a small number of homes are permitted. Any further housing development on Parish land within the area called "Banbury 17" will lead to coalescence with Bodicote village. The Local Plan must respect the distinctive setting and character of Bodicote, which is a Domesday village. The Salt Way is an ancient historic route. There does not seem to be a proper traffic/highway assessment in place, with measures for access, etc. The proposed housing southeast of Salt Way is not sustainable because of the obvious traffic problems it will create.....
162/1	Val	Russell	Bodicote parish council	Main	119					Cont....The development will generate additional traffic movements along Wykham Lane. . . best described as a rural lane, narrow, winding, without street lighting and of a lower standard of construction than more strategic routes. As such this intensification of use is considered undesirable in terms of highway safety and convenience.
165/1	Andrew	Docherty	Smiths Gore / The Oxford Diocesan Board of Finance and the Trustees of the Milton and Adderbury	Main	119			The inclusion of land to the South of Salt Way for residential development under Policy Banbury 17 is supported. The site is suitable and deliverable and would make an appropriate and sustainable contribution towards achieving the Council's objectively assessed housing need.		

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164/8	Sarah	Smith	Rapleys LLP / Pandora Trading Ltd	Main	119	Through the allocation of Banbury 16,17 and 18 and their removal from the green buffer it is clear that: 1. Areas of attractive countryside which form the setting to Banbury (as evidenced in Inquiry Core Document ENV03) are now proposed for development; 2. Ridgelines containing the town (as evidenced in ENV03) are now proposed to be breached by development, notably Banbury 18; 3. Areas which fulfilled the green buffer criteria (evidenced in ENV04) are now proposed for development despite the adverse impacts on setting and coalescence; 4. There is a lack of consistency and transparency in the approach which has been taken. For example, Banbury 16 and Banbury 17 would reduce the gap between Banbury and Bodicote to 200m, whereas the extension of the green buffer over Banbury 2 would result in a separation of over 1,000m between Banbury and Hanwell; 5. The green buffer evidence base has clearly been set aside; 6. CDC has been very selective in terms of its use of and reliance on all of the landscape related evidence base.	The allocations of Banbury 16,17,and 18 should be deleted and the green buffer designation should be re-instated across their extent.		Not in respect of these stated modifications. Comments are provided on the Sustainability Appraisal in a separate representation.	Concerns over the sustainability and, importantly, the deliverability of Banbury 16, 17 and 18 raises serious questions about the robustness of the allocation of these particular sites.
166/16	Helen	Marshall	CPRE Oxfordshire	Main	119	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			The increase in overall housing numbers applied to the District as a whole (from 16,750 to 22,840) is even more exaggerated in the case of Bicester, which is supposed to increase its target by no less than 47% (6,894 to 10,129). CPRE is especially concerned over the downstream effects of increasingly rapid run off, which, with the growing intensity of rainfall events is unlikely to be properly mitigated by SUDS. And overall the inevitable major increase in road traffic stemming from all this development will result in a noticeable feeling of urbanisation in what is a predominantly rural district (SA para 1.137). The effect of setting such a target is addressed by the Sustainability Appraisal prepared by LUC. This states that too rapid and too large a scale of growth could (we would say will) place the services, facilities, and infrastructure of the town under (considerable) strain (SA para 1.74). The SA goes on to say that the cumulative effect of so much new housing will have a significant adverse effect through loss of greenfield and agricultural land, and is likely to have a similar adverse effect on air quality, biodiversity and landscape (SA para 1.136). Pressure on water resources and waste treatment will intensify (SA para 1.138)
217/4	Nick	Freer	David Lock Associates / Gallagher Estates and John Colegrave	Main	119		Revise the text introduction to the first, third and third paragraphs: "The sites are located to the south of Salt Way and to the east of the A361 Bloxham Road....." "The development of site Banbury 17 combines three two separate but adjoining sites, That have the potential to be developed as part of a single development area..... " "Structural planting and landscaping....."	Strongly support the principle of the allocation of the site as the most substantive element of Banbury 17. The intention of the introductory text is correct but still needs a few amendments to ensure clarity of the approach and consistency of the policy.		
251/13	Heather	Vickers	Planning Potential / Gleeson Developments Ltd	Main	119	The inclusion of Banbury 16 and 17, are inconsistent with the Council's evidence base. There has been no assessment of reasonable alternatives (i.e. additional required housing sites) within the Council's recently prepared evidence base (White Young Green Reports 2014) The inclusion of Crouch Hill as an important historical and topographical landscape landmark is not justified. Proposed allocations entirely inconsistent with findings of 4.6 of Green Buffer Report (Sept.2013) which clearly identifies importance of conserving countryside south of Salt Way where there is a 'strong rural character' with 'fields integral to the setting of the route' of Salt Way.	Addition of further strategic development sites within Banbury to meet the Council's objectively assessed housing need, which will increase the figure stated within Modification 116. This section of the Plan should include an additional Banbury Policy 20: Land North East of Crouch Hill Farm Adjoining Broughton Road. References to the importance of Crouch Hill must be justified by a robust evidence base, which does not currently exist. Reference to its importance should therefore be deleted from Modification 117. Reference to the visual impacts on Crouch Hill contradicts the deletion of paragraph C.124 (Modification 93) and therefore should be amended within Modification 117, albeit, if retained, should simply refer to the setting of Crouch Hill as a 'landscape feature'. Modification 118 and 120 includes repetition of a number of points (bulleted lists – Key Site Specific Design and Place Shaping Principles) – this should be reviewed and amended to ensure points are only made once.			

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254/10	Mark	Mathews	Thames Water	Main	119					Thames Water has no comments to make on the main modifications or IDP text. The supply and wastewater networks are unlikely to be able to support the demand anticipated from South of Salt Way East. Infrastructure is likely to be required. Water supply and drainage strategies would be required from the developer. If upgrading is required there could be a delay of up to 3 years for delivery unless the developer requisitions the infrastructure.
010	Rachel	Wegerhoff		Main	120				No comment	Objection raised on the proposed allocation at South of Salt Way - East (Banbury 17). The consultation process seems extremely complicated for the average person. The land is used constantly by dog walkers, horse riders and walkers etc. It would be such an enormous shame for the people of Banbury to lose another part of the ever diminishing countryside to yet more unrequired generic housing estates. The green land between Banbury and surrounding villages is in decline. How could we be encouraged to be fit and healthy when areas like this are destroyed. The area is used by people of all ages and abilities to simply enjoy the great outdoors and get some 'fresh' air. The elderly in particular enjoy this area for walking and these people are either not fit enough or simply cannot afford to join a gym. Banbury doesn't need all of these extra housing developments. Despite the Plan offering more employment spaces in Banbury, it isn't enough. Banbury needs more diverse employment opportunities as it is saturated by factory and retail jobs but not at the expense of losing yet more green areas for the locals to enjoy. Banbury is a market town and should not be destroyed.
016	Paul	Weston		Main	120				No comment	Objection raised on the proposed allocation at South of Salt Way - East (Banbury 17). Reasons include: It places a disproportionate burden on the South of Banbury to accommodate the housing requirements of the next 15 years. The combination of the current Bankside Development plus Banbury 4, Banbury 16 and Banbury 17 add almost 3,000 dwellings into an area that represents less than a quarter of the area potentially available. The area is absorbing as much new development as the rest of the town put together; The previous Plan had shown the area as a proposed Green Buffer but has now changed to a proposed housing allocation; Concern about the inevitable increase in traffic along Wykham Lane and the particular risk during peak hours; Concerned over the linkages between this change to the Plan and a completely spurious planning application made by Gallagher Estates to develop this land even while the Local Plan clearly would have dis-allowed this. That planning application was turned down and was subsequently withdrawn. The changes are a mirror copy of the planning application that was made which causes a concern.
047/41	Matthew	Coyne	Banbury Town Council	Main	120					Objection to the proposed allocation of new sites Banbury 16 and Banbury 17. Saltway forms a natural physical boundary, where residential development has been refused in the past. The area has high landscape value with good quality agricultural land. It includes Crouch Hill which overlooks Banbury and the site. It would result in coalescence with Bodicote. Development is likely a detrimental impact on Banbury's road network.

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089/6	Charlotte	Kinnear	RSPB	Main	120	<p>The Submission Local Plan does not address the green space needs of the new allocations or impact of allocations on green space. Development of new areas will increase the imbalance between the amount of development and the amount of green space for existing and new residents. This imbalance exists taking into account planned new green space, partly because the Green Spaces Strategy is out of date.</p> <p>The Local Plan fails to recognise that much of the green space identified, including playing fields and sports pitches, is of little value for wildlife.</p> <p>Banbury's ecological network is weak with no Local Nature Reserves or biological SSSIs and only one proposed Local Wildlife Site. Some existing Green Space, eg Salt Way, will be significantly affected by proposed allocations.</p> <p>Natural England recommends there should be one hectare of Local Nature Reserve provision for every 1,000 people.</p>	<p>Update Cherwell Green Spaces Strategy 2008-2016 to take account of proposed new allocations so that all up to date information is included as expected in the NPPF, paragraph 73 .</p> <p>The Local Plan should protect and increase semi-natural habitat in step with planned new development in accordance with the NPPF, paragraphs 109 and 114.</p> <p>Use up to date information from the Phase 1 habitat mapping CDC commissioned TVERC to carry out last year, to identify new areas to promote enhancement and management of Banbury's few areas of semi-natural habitat to create new areas of high quality natural green space to buffer existing sites of importance or to provide stepping stones between these. See enclosed map for suggested sites and areas that might form the basis for a more ambitious vision for the town's natural green space linked to new allocations.</p>		<p>Agree that the allocations will have a minor impact on biodiversity given that the locations are all currently managed as intensive farmland.</p> <p>The SA claim that there will be a minor positive effect on biodiversity from some of the proposed allocations is not a true reflection of the proposed allocations' impact on biodiversity or the delivery of a net gain in biodiversity. While the proposed allocations may not have an impact, it is inappropriate to say they have a positive impact compared to hypothetical alternative development elsewhere. Recommend that all the proposed allocations for which a minor positive impact is identified be reclassified as 'negligible effect likely'.</p>	
107/3	Steven	Sensecall	Kemp & Kemp LLP / Tudor Hall School	Main	120		<p>Under Key Site Specific Design and Place Shaping Principles, add the following to the end of bullet point 3: "<u>The landscape sensitivity of the south-western corner of the site (identified on the Proposals Map) is such that - a) it will be kept free from built development; and b) its existing pastoral, rural estate landscape character will be retained.</u>" Add the following to the end of bullet point 14: "<u>The transport assessment should also assess traffic impacts on nearby key facilities including Tudor Hall School.</u>"</p>			<p>The School has to access off the A361 Bloxham Road, at the Wykham Lane crossroads and further north close to the proposed access to the South of Salt Way - East proposed allocation. The A361 is a busy road with a poor accident record. The School welcomes the reference in the draft policy to the need for a Transport Assessment and travel plan. The assessment needs to give careful consideration the likely impact on both of its existing accesses and in particular to how the Wykham Lane crossroads might be improved/made safe. The School would wish to work constructively with the Council and developers to ensure that its concerns are properly considered and addressed.</p>
161/16	Martin	Small	English Heritage	Main	120		<p>an additional principle be added: "An archaeological investigation to inform an archaeological mitigation scheme as required".</p>			<p>English Heritage welcomes and supports the key site specific design and place shaping principles referring to a buffer between future development and Salt Way and the setting of the Bodicote Conservation Area in Proposed Policy Banbury 17</p>
165/2	Andrew	Docherty	Smiths Gore / The Oxford Diocesan Board of Finance and the Trustees of the Milton and Adderbury Feoffee	Main	120			<p>The inclusion of land to the South of Salt Way for residential development under Policy Banbury 17 is supported. The site is suitable and deliverable and would make an appropriate and sustainable contribution towards achieving the Council's objectively assessed housing need.</p>		<p>As no agricultural land will remain within the allocated site, the requirement for an agricultural land quality survey is unnecessary. Similarly, the 'walkable neighbourhoods' requirement of the draft Policy is repeated unnecessarily</p>
164/9	Sarah	Smith	Rapleys LLP / Pandora Trading Ltd	Main	120	<p>Through the allocation of Banbury 16,17 and 18 and their removal from the green buffer it is clear that:</p> <ol style="list-style-type: none"> 1. Areas of attractive countryside which form the setting to Banbury (as evidenced in Inquiry Core Document ENV03) are now proposed for development; 2. Ridgelines containing the town (as evidenced in ENV03) are now proposed to be breached by development, notably Banbury 18; 3. Areas which fulfilled the green buffer criteria (evidenced in ENV04) are now proposed for development despite the adverse impacts on setting and coalescence; 4. There is a lack of consistency and transparency in the approach which has been taken. For example, Banbury 16 and Banbury 17 would reduce the gap between Banbury and Bodicote to 200m, whereas the extension of the green buffer over Banbury 2 would result in a separation of over 1,000m between Banbury and Hanwell; 5. The green buffer evidence base has clearly been set aside; 6. CDC has been very selective in terms of its use of and reliance on all of the landscape related evidence base. 	<p>The allocations of Banbury 16,17,and 18 should be deleted and the green buffer designation should be re-instated across their extent.</p>		<p>Not in respect of these stated modifications. Comments are provided on the Sustainability Appraisal in a separate representation.</p>	<p>Concerns over the sustainability and, importantly, the deliverability of Banbury 16, 17 and 18 raises serious questions about the robustness of the allocation of these particular sites.</p>

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166/17	Helen	Marshall	CPRE Oxfordshire	Main	120	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			<p>The increase in overall housing numbers applied to the District as a whole (from 16,750 to 22,840) is even more exaggerated in the case of Bicester, which is supposed to increase its target by no less than 47% (6,894 to 10,129). CPRE is especially concerned over the downstream effects of increasingly rapid run off, which, with the growing intensity of rainfall events is unlikely to be properly mitigated by SUDS. And overall the inevitable major increase in road traffic stemming from all this development will result in a noticeable feeling of urbanisation in what is a predominantly rural district (SA para 1.137).</p> <p>The effect of setting such a target is addressed by the Sustainability Appraisal prepared by LUC. This states that too rapid and too large a scale of growth could (we would say will) place the services, facilities, and infrastructure of the town under (considerable) strain (SA para 1.74). The SA goes on to say that the cumulative effect of so much new housing will have a significant adverse effect through loss of greenfield and agricultural land, and is likely to have a similar adverse effect on air quality, biodiversity and landscape (SA para 1.136). Pressure on water resources and waste treatment will intensify (SA para 1.138).</p>
186/14	Rob	Kinchin-Smith	Banbury Civic Society	Main	120					Banbury Civic Society (and many others, including the council) have consistently resisted the allocation of this site. However if this site is needed the place shaping principles contained are supported.
217/5	Nick	Freer	David Lock Associates / Gallagher Estates and John Colegrave	Main	120	Strongly supports the allocation of land at Wykham Park Farm however do not support the Development Description which states "integrated and coordinated and comprehensive planning approach to the delivery of the link road". It is more appropriate that the layout for each individual site should allow for such a route, if the need arises, and as such, this item should appear as a site design and place shaping principles and not as an infrastructure requirement under Infrastructure Needs heading. Technical studies and detailed modelling have been undertaken as part of the preparation of the planning application which suggests that a route for a local east-west link is not required to make the development acceptable. The link road is not identified in the Infrastructure Delivery Plan. A comprehensive masterplan is not needed as the policy sets out the principles for development but also consultation will take place during the preparation and/or determination of applications. Wording on public art provision should be reworded to refer to "opportunities" rather than "provision for" to accord with national policy.	<p>Areas of the Policy to be revised as follows: Development Area: 68 hectares (in total) <u>Land east of Bloxham Road and south of Salt Way (5.93 ha)</u> <u>outline permission for 145 dwellings</u> <u>Land east of Bloxham Road (50.09 ha)</u> <u>Land west of Bodicote (17.63 ha)</u></p> <p>Development Description - Development of land south of SaltWay – East will deliver a new neighbourhood of up to 1,345 dwellings with associated facilities and infrastructure as part of SW Banbury. The site is in more than one ownership (Land east of the Bloxham Road and land west of Bodicote) but the development area forms a coherent whole. An integrated <u>and</u> coordinated <u>and comprehensive</u> planning approach will be taken and is described in the place making and design principles set out in the policy, with a link road between the sites in separate ownerships. The site will require a masterplan to ensure this is delivered.</p> <p>Infrastructure Needs - Access and movement – Principal access to be created off the Bloxham Road (A361). The layout should also allow for a route for any future east-west link to join White Post Road for local traffic should that may be identified in the movement strategy of the Banbury Master Plan.</p>			Policy ESD3 - Reference to "exemplary" demonstration of compliance with requirements for sustainable development is not justified there is no evidence that supports an assumption that strategic development sites can support enhanced standards and costs of development. Provision of extra care housing - More flexibility should be provided in the wording to demonstrate that such an element would be considered as part of the overall housing mix alongside wider considerations of development viability.

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217/5	Nick	Freer	David Lock Associates / Gallagher Estates and John Colegrave	Main	120	Strongly supports the allocation of land at Wykham Park Farm however do not support the Development Description which states "integrated and coordinated and comprehensive planning approach to the delivery of the link road". It is more appropriate that the layout for each individual site should allow for such a route, if the need arises, and as such, this item should appear as a site design and place shaping principles and not as an infrastructure requirement under Infrastructure Needs heading. Technical studies and detailed modelling have been undertaken as part of the preparation of the planning application which suggests that a route for a local east-west link is not required to make the development acceptable. The link road is not identified in the Infrastructure Delivery Plan. A comprehensive masterplan is not needed as the policy sets out the principles for development but also consultation will take place during the preparation and/or determination of applications. Wording on public art provision should be reworded to refer to "opportunities" rather than "provision for" to accord with national policy.	Cont.....Key site specific design and place shaping principles - The development-Development proposals for individual sites should demonstrate, as part of their masterplanning approach, regard to a comprehensive masterplan for the allocated site. in consultation with the Council, Oxfordshire County Council, the Local Nature Partnership (Wild Oxfordshire) and local communities. - <u>The layout should also allow for a route for any future east-west link to join White Post Road for local traffic that may be identified in the movement strategy of the Banbury Master Plan. - Demonstration of climate change mitigation and adaptation measures including exemplary demonstration.....</u> - <u>Consideration of opportunities for the provision of public art....</u>			Policy ESD3 - Reference to "exemplary" demonstration of compliance with requirements for sustainable development is not justified there is no evidence that supports an assumption that strategic development sites can support enhanced standards and costs of development. Provision of extra care housing - More flexibility should be provided in the wording to demonstrate that such an element would be considered as part of the overall housing mix alongside wider considerations of development viability.
251/14	Heather	Vickers	Planning Potential / Gleeson Developments Ltd	Main	120	The inclusion of Banbury 16 and 17, are inconsistent with the Council's evidence base. There has been no assessment of reasonable alternatives (i.e. additional required housing sites) within the Council's recently prepared evidence base (White Young Green Reports 2014) The inclusion of Crouch Hill as an important historical and topographical landscape landmark is not justified. Proposed allocations entirely inconsistent with findings of 4.6 of Green Buffer Report (Sept.2013) which clearly identifies importance of conserving countryside south of Salt Way where there is a 'strong rural character' with 'fields integral to the setting of the route' of Salt Way.	Addition of further strategic development sites within Banbury to meet the Council's objectively assessed housing need, which will increase the figure stated within Modification 116. This section of the Plan should include an additional Banbury Policy 20: Land North East of Crouch Hill Farm Adjoining Broughton Road. References to the importance of Crouch Hill must be justified by a robust evidence base, which does not currently exist. Reference to its importance should therefore be deleted from Modification 117. Reference to the visual impacts on Crouch Hill contradicts the deletion of paragraph C.124 (Modification 93) and therefore should be amended within Modification 117, albeit, if retained, should simply refer to the setting of Crouch Hill as a 'landscape feature'. Modification 118 and 120 includes repetition of a number of points (bulleted lists – Key Site Specific Design and Place Shaping Principles) – this should be reviewed and amended to ensure points are only made once.			
258/3	Craig	Barnes	Gladman Developments	Main	120				No comment	Supports the allocation of Banbury 17. The site is available and is deliverable within the plan period. In developing a site masterplan for the site, it will ensure that it does not prejudice the remainder of the site or objectives of the Council and are keen to work with the Council, its partners and the sites other developers.
258/9	Craig	Barnes	Gladman Developments	Main	120				No comment	It is critical that the eastern part of Banbury 17 is included within the allocation as this will secure the delivery of the east-west road link that is essential to tackle existing congestion problems and deliver the new bus route that is important to the sustainability of the entire allocation. There is no reason for a comprehensive masterplan to secure the delivery of the full allocation. The site is available and deliverable.
300/14	Penny	Silverwood	Berks, Bucks and Oxon Wildlife Trust (BBOWT)	Main	120		The policy should include reference to the Green Infrastructure links being designed to incorporate biodiversity enhancements and connectivity of ecological networks in line with NPPF.			Support bullet point 19 (Green Infrastructure) and 21 (ecological impacts) under Key site specific design and place shaping principles.

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301/80	Bev	Hindle	Oxfordshire County Council	Main	120	<p>Policy Banbury 17 – South of Salt Way – East</p> <p>Education - In order to facilitate the extension of Blessed George Napier Secondary School, it is requested that this policy is amended to provide 2.855 hectares of land for playing fields immediately south of the school. This would compensate for building on the school's existing playing fields in order to extend the facility to an up to 1,400 place school. Access arrangements from this development to the school will also need to be considered, including a potential pupil drop off and pedestrian / cycle access over the Salt Way.</p> <p>Should the extension of Blessed George Napier Secondary School not be possible, it is requested that policy wording allows for the option of using the 2.855 hectares of land for a Studio School or University Technical College (UTC). Education - It is stated under Infrastructure Needs "Education – land for a primary school. Contributions may also be sought towards provision of secondary school places". The site will be required to deliver the whole primary school, not just the site, and secondary contributions will be sought.</p> <p>Archaeology - The site has been the subject of a number of archaeological investigations as part of a number of separate planning applications and pre-application discussions, including geophysical survey and trenched evaluations.....</p>	<p>Amend policy wording accordingly</p> <p>Contributions may will also be sought towards provision of secondary school places".</p> <p>Amend the Key Site Specific Design and Place Shaping Principles section to refer to: <u>the need to physically preserve the location of the Neolithic causewayed enclosure. The remainder of the archaeological features will require further investigation and recording ahead of any development. A programme of archaeological mitigation will be required ahead of any development of the site.</u></p> <p><u>In addition to the provision of a bus service through the site and associated bus stops, provision is required for buses to turn around during the early part of housing delivery.</u></p> <p><u>Early delivery of the A361 to A4260 Link Road is required, along with associated junctions. The developer will be required to fund the cost of additional public transport to serve the site.</u></p> <p>Delete 1st reference Delete</p> <p>Reword to: The layout should also allow for provide an a route for any future east-west link to...</p>			
301/80	Bev	Hindle	Oxfordshire County Council	Main	120	<p>Cont.....These investigations recorded a number of archaeological features including a probable Neolithic causewayed enclosure as well as a number of Iron Age and Roman features in a number of locations across the site. The Neolithic causewayed enclosure is considered to be of high significance and will need to be physically preserved as part of any development of the site. Public transport - Parts of this site are a considerable walking distance from existing and planned bus stops on Bloxham Road, White Post Road, and Sycamore Drive. Under site specific design and place shaping principles there is duplication of: A layout that maximises the potential for walkable neighbourhoods and enables a high degree of integration and connectivity between new and existing communities; and</p> <p>A linked network of cycle and footways to provide access into Banbury/ Access and movement – Principal access to be created off the Bloxham Road (A361). The layout should also allow for a route for any future east-west link to join White Post Road for local traffic should that may be identified in the movement strategy of the Banbury Master Plan.</p> <p>Minerals - Banbury 17 affects deposits of ironstone. However, it is not considered that there would be sufficient potential impact on possibly workable mineral resources to justify an objection.</p>	<p>Amend policy wording accordingly</p> <p>Contributions may will also be sought towards provision of secondary school places".</p> <p>Amend the Key Site Specific Design and Place Shaping Principles section to refer to: <u>the need to physically preserve the location of the Neolithic causewayed enclosure. The remainder of the archaeological features will require further investigation and recording ahead of any development. A programme of archaeological mitigation will be required ahead of any development of the site.</u></p> <p><u>In addition to the provision of a bus service through the site and associated bus stops, provision is required for buses to turn around during the early part of housing delivery.</u></p> <p><u>Early delivery of the A361 to A4260 Link Road is required, along with associated junctions. The developer will be required to fund the cost of additional public transport to serve the site.</u></p> <p>Delete 1st reference Delete</p> <p>Reword to: The layout should also allow for provide an a route for any future east-west link to...</p>			
047/42	Matthew	Coyne	Banbury Town Council	Main	121					Support expressed for the allocation of Drayton Lodge farm site (proposed Banbury 18)

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089/7	Charlotte	Kinnear	RSPB	Main	121	<p>The Submission Local Plan does not address the green space needs of the new allocations or impact of allocations on green space. Development of new areas will increase the imbalance between the amount of development and the amount of green space for existing and new residents. This imbalance exists taking into account planned new green space, partly because the Green Spaces Strategy is out of date.</p> <p>The Local Plan fails to recognise that much of the green space identified, including playing fields and sports pitches, is of little value for wildlife.</p> <p>Banbury's ecological network is weak with no Local Nature Reserves or biological SSSIs and only one proposed Local Wildlife Site. Some existing Green Space, eg Salt Way, will be significantly affected by proposed allocations.</p> <p>Natural England recommends there should be one hectare of Local Nature Reserve provision for every 1,000 people.</p>	<p>Update Cherwell Green Spaces Strategy 2008-2016 to take account of proposed new allocations so that all up to date information is included as expected in the NPPF, paragraph 73 .</p> <p>The Local Plan should protect and increase semi-natural habitat in step with planned new development in accordance with the NPPF, paragraphs 109 and 114.</p> <p>Use up to date information from the Phase 1 habitat mapping CDC commissioned TVERC to carry out last year, to identify new areas to promote enhancement and management of Banbury's few areas of semi-natural habitat to create new areas of high quality natural green space to buffer existing sites of importance or to provide stepping stones between these. See enclosed map for suggested sites and areas that might form the basis for a more ambitious vision for the town's natural green space linked to new allocations.</p>		<p>Agree that the allocations will have a minor impact on biodiversity given that the locations are all currently managed as intensive farmland.</p> <p>The SA claim that there will be a minor positive effect on biodiversity from some of the proposed allocations is not a true reflection of the proposed allocations' impact on biodiversity or the delivery of a net gain in biodiversity. While the proposed allocations may not have an impact, it is inappropriate to say they have a positive impact compared to hypothetical alternative development elsewhere. Recommend that all the proposed allocations for which a minor positive impact is identified be reclassified as 'negligible effect likely'.</p>	
161/17	Martin	Small	English Heritage	Main	121					English Heritage welcomes the references to the archaeological constraint priority area covering part of the site and Drayton Conservation Area in the Proposed supporting text for Proposed Policy Banbury 18.
164/10	Sarah	Smith	Rapleys LLP / Pandora Trading Ltd	Main	121	<p>Through the allocation of Banbury 16,17 and 18 and their removal from the green buffer it is clear that:</p> <ol style="list-style-type: none"> 1. Areas of attractive countryside which form the setting to Banbury (as evidenced in Inquiry Core Document ENV03) are now proposed for development; 2. Ridgelines containing the town (as evidenced in ENV03) are now proposed to be breached by development, notably Banbury 18; 3. Areas which fulfilled the green buffer criteria (evidenced in ENV04) are now proposed for development despite the adverse impacts on setting and coalescence; 4. There is a lack of consistency and transparency in the approach which has been taken. For example, Banbury 16 and Banbury 17 would reduce the gap between Banbury and Bodicote to 200m, whereas the extension of the green buffer over Banbury 2 would result in a separation of over 1,000m between Banbury and Hanwell; 5. The green buffer evidence base has clearly been set aside; 6. CDC has been very selective in terms of its use of and reliance on all of the landscape related evidence base; 	<p>The allocations of Banbury 16,17,and 18 should be deleted and the green buffer designation should be re-instated across their extent.</p>		<p>Not in respect of these stated modifications. Comments are provided on the Sustainability Appraisal in a separate representation.</p>	<p>Concerns over the sustainability and, importantly, the deliverability of Banbury 16, 17 and 18 raises serious questions about the robustness of the allocation of these particular sites.</p>
166/18	Helen	Marshall	CPRE Oxfordshire	Main	121	<p>CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.</p>	<p>The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.</p>			<p>The increase in overall housing numbers applied to the District as a whole (from 16,750 to 22,840) is even more exaggerated in the case of Bicester, which is supposed to increase its target by no less than 47% (6,894 to 10,129). CPRE is especially concerned over the downstream effects of increasingly rapid run off, which, with the growing intensity of rainfall events is unlikely to be properly mitigated by SUDS. And overall the inevitable major increase in road traffic stemming from all this development will result in a noticeable feeling of urbanisation in what is a predominantly rural district (SA para 1.137).</p> <p>The effect of setting such a target is addressed by the Sustainability Appraisal prepared by LUC. This states that too rapid and too large a scale of growth could (we would say will) place the services, facilities, and infrastructure of the town under (considerable) strain (SA para 1.74). The SA goes on to say that the cumulative effect of so much new housing will have a significant adverse effect through loss of greenfield and agricultural land, and is likely to have a similar adverse effect on air quality, biodiversity and landscape (SA para 1.136). Pressure on water resources and waste treatment will intensify (SA para 1.138).</p>

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113	Mary and Michael / Jane and Richard	Whatman / Jones		Main	122		The present golf course (as distinct from the driving range) to be maintained as a green belt space, kept open for recreational use, perhaps as a country park. The lake and copse area adjoining the lake to be maintained as existing. The lake area should be fenced off and made inaccessible to the public.			The site was a working farm with buildings converted into residential dwellings. Any new development should respect the existing living environment and protect the residential amenity. Concerned about the security aspects of the two properties on the site which abuts a small lake on one side. The other side is bordered by a small relatively wild copse area which is a sanctuary to a wide variety of wild life, water birds and fish.
089/8	Charlotte	Kinnear	RSPB	Main	122	<p>The Submission Local Plan does not address the green space needs of the new allocations or impact of allocations on green space. Development of new areas will increase the imbalance between the amount of development and the amount of green space for existing and new residents. This imbalance exists taking into account planned new green space, partly because the Green Spaces Strategy is out of date.</p> <p>The Local Plan fails to recognise that much of the green space identified, including playing fields and sports pitches, is of little value for wildlife.</p> <p>Banbury's ecological network is weak with no Local Nature Reserves or biological SSSIs and only one proposed Local Wildlife Site. Some existing Green Space, eg Salt Way, will be significantly affected by proposed allocations.</p> <p>Natural England recommends there should be one hectare of Local Nature Reserve provision for every 1,000 people.</p>	<p>Update Cherwell Green Spaces Strategy 2008-2016 to take account of proposed new allocations so that all up to date information is included as expected in the NPPF, paragraph 73 .</p> <p>The Local Plan should protect and increase semi-natural habitat in step with planned new development in accordance with the NPPF, paragraphs 109 and 114.</p> <p>Use up to date information from the Phase 1 habitat mapping CDC commissioned TVERC to carry out last year, to identify new areas to promote enhancement and management of Banbury's few areas of semi-natural habitat to create new areas of high quality natural green space to buffer existing sites of importance or to provide stepping stones between these. See enclosed map for suggested sites and areas that might form the basis for a more ambitious vision for the town's natural green space linked to new allocations.</p>		<p>Agree that the allocations will have a minor impact on biodiversity given that the locations are all currently managed as intensive farmland.</p> <p>The SA claim that there will be a minor positive effect on biodiversity from some of the proposed allocations is not a true reflection of the proposed allocations' impact on biodiversity or the delivery of a net gain in biodiversity. While the proposed allocations may not have an impact, it is inappropriate to say they have a positive impact compared to hypothetical alternative development elsewhere. Recommend that all the proposed allocations for which a minor positive impact is identified be reclassified as 'negligible effect likely'.</p>	
161/18	Martin	Small	English Heritage	Main	122		<p>Prefer this key site specific design and place shaping principle to read "Development proposals to be accompanied and influenced by a landscape and visual impact assessment and a heritage impact assessment"</p> <p>A new key site specific and place shaping principle should be added to Proposed Policy Banbury 18: "An archaeological investigation to inform an archaeological mitigation scheme as required".</p>			Without a requirement to take the archaeological significance of the site, including both known and potential significance, into account when preparing detailed development proposals, the Policy as drafted fails to provide adequate protection to archaeological significance. English Heritage welcomes the Proposed principle that development proposals should be accompanied by a heritage assessment.
164/11	Sarah	Smith	Rapleys LLP / Pandora Trading Ltd	Main	122	<p>Through the allocation of Banbury 16,17 and 18 and their removal from the green buffer it is clear that:</p> <ol style="list-style-type: none"> 1. Areas of attractive countryside which form the setting to Banbury (as evidenced in Inquiry Core Document ENV03) are now proposed for development; 2. Ridgelines containing the town (as evidenced in ENV03) are now proposed to be breached by development, notably Banbury 18; 3. Areas which fulfilled the green buffer criteria (evidenced in ENV04) are now proposed for development despite the adverse impacts on setting and coalescence; 4. There is a lack of consistency and transparency in the approach which has been taken. For example, Banbury 16 and Banbury 17 would reduce the gap between Banbury and Bodicote to 200m, whereas the extension of the green buffer over Banbury 2 would result in a separation of over 1,000m between Banbury and Hanwell; 5. The green buffer evidence base has clearly been set aside; 6. CDC has been very selective in terms of its use of and reliance on all of the landscape related evidence base; 	<p>The allocations of Banbury 16,17,and 18 should be deleted and the green buffer designation should be re-instated across their extent.</p>		<p>Not in respect of these stated modifications. Comments are provided on the Sustainability Appraisal in a separate representation.</p>	<p>Concerns over the sustainability and, importantly, the deliverability of Banbury 16, 17 and 18 raises serious questions about the robustness of the allocation of these particular sites.</p>

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166/19	Helen	Marshall	CPRE Oxfordshire	Main	122	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			<p>The increase in overall housing numbers applied to the District as a whole (from 16,750 to 22,840) is even more exaggerated in the case of Bicester, which is supposed to increase its target by no less than 47% (6,894 to 10,129). CPRE is especially concerned over the downstream effects of increasingly rapid run off, which, with the growing intensity of rainfall events is unlikely to be properly mitigated by SUDS. And overall the inevitable major increase in road traffic stemming from all this development will result in a noticeable feeling of urbanisation in what is a predominantly rural district (SA para 1.137).</p> <p>The effect of setting such a target is addressed by the Sustainability Appraisal prepared by LUC. This states that too rapid and too large a scale of growth could (we would say will) place the services, facilities, and infrastructure of the town under (considerable) strain (SA para 1.74). The SA goes on to say that the cumulative effect of so much new housing will have a significant adverse effect through loss of greenfield and agricultural land, and is likely to have a similar adverse effect on air quality, biodiversity and landscape (SA para 1.136). Pressure on water resources and waste treatment will intensify (SA para 1.138).</p>
254/6	Mark	Mathews	Thames Water	Main	122					Thames Water has no comments to make on the main modifications or IDP text. The supply and wastewater networks are unlikely to be able to support the demand anticipated from Drayton Lodge Farm. Infrastructure is likely to be required. Water supply and drainage strategies would be required from the developer. If upgrading is required there could be a delay of up to 3 years for delivery unless the developer requisitions the infrastructure.
300/15	Penny	Silverwood	Berks, Bucks and Oxon Wildlife Trust (BBOWT)	Main	122		The policy should include reference to the Green Infrastructure links being designed to incorporate biodiversity enhancements and connectivity of ecological networks in line with NPPF.			Support bullet point 21 (Green Infrastructure) under Key site specific design and place shaping principles.
301/81	Bev	Hindle	Oxfordshire County Council	Main	122	<p>Policy Banbury 18 – Land at Drayton Lodge Farm</p> <p>Education - Under Infrastructure Needs it is stated: "Education – land for a primary school". At this stage such a requirement cannot be confirmed, but it would be precautionary planning to allow for this eventuality, should expansion of William Morris not prove feasible, and no other school site become available. Contributions may also be sought towards provision of secondary school places".</p> <p>Archaeology - The site is located in an area of archaeological potential immediately south east to an area where a fairly large amount of archaeological features have been identified through a geophysical survey. These features include possible prehistoric ring ditches, enclosures, field boundaries and a series of pit-like features. A small number of pre-medieval features have been recorded immediately south east of this proposed site. Archaeological features may therefore survive within the site.</p> <p>Ecology - The site contains potential UK Priority Habitat. The District Council should seek advice from their own ecologist about the impact of the development on the Habitat.</p> <p>Public transport - States under Access & Movement that Principal access will be provided off the Bloxham Road (A361) – revise to Warwick Road (B4100).....</p>	<p>Amend wording as follows:</p> <p>"Education – <u>to include financial or in-kind contributions towards secondary education provision</u>".</p> <p>Amend the wording in the Key site specific design and place shaping principles section to include:</p> <p><u>"An archaeological field evaluation to assess the impact of the development on archaeological features"</u></p>			
301/81	Bev	Hindle	Oxfordshire County Council	Main	122	<p>Cont.....The site does not require a bus route or bus stops within the site. The developer will be required to contribute towards improved public transport along Warwick Road, towards new bus stops on Warwick Road, and to provide walking routes to these stops so that no dwelling is more than 500m distant.</p> <p>Minerals - Banbury 18 affects deposits of ironstone. However, it is not considered that there would be sufficient potential impact on possibly workable mineral resources to justify an objection on minerals sterilisation policy grounds.</p>	<p>Amend wording as follows:</p> <p>"Education – <u>to include financial or in-kind contributions towards secondary education provision</u>".</p> <p>Amend the wording in the Key site specific design and place shaping principles section to include:</p> <p><u>"An archaeological field evaluation to assess the impact of the development on archaeological features"</u></p>			

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047/43	Matthew	Coyne	Banbury Town Council	Main	123					Support for the allocation of Higham way site (proposed Banbury 19)
089/9	Charlotte	Kinnear	RSPB	Main	123	<p>The Submission Local Plan does not address the green space needs of the new allocations or impact of allocations on green space. Development of new areas will increase the imbalance between the amount of development and the amount of green space for existing and new residents. This imbalance exists taking into account planned new green space, partly because the Green Spaces Strategy is out of date.</p> <p>The Local Plan fails to recognise that much of the green space identified, including playing fields and sports pitches, is of little value for wildlife.</p> <p>Banbury's ecological network is weak with no Local Nature Reserves or biological SSSIs and only one proposed Local Wildlife Site. Some existing Green Space, eg Salt Way, will be significantly affected by proposed allocations.</p> <p>Natural England recommends there should be one hectare of Local Nature Reserve provision for every 1,000 people.</p>	<p>Update Cherwell Green Spaces Strategy 2008-2016 to take account of proposed new allocations so that all up to date information is included as expected in the NPPF, paragraph 73 .</p> <p>The Local Plan should protect and increase semi-natural habitat in step with planned new development in accordance with the NPPF, paragraphs 109 and 114.</p> <p>Use up to date information from the Phase 1 habitat mapping CDC commissioned TVERC to carry out last year, to identify new areas to promote enhancement and management of Banbury's few areas of semi-natural habitat to create new areas of high quality natural green space to buffer existing sites of importance or to provide stepping stones between these. See enclosed map for suggested sites and areas that might form the basis for a more ambitious vision for the town's natural green space linked to new allocations.</p>		<p>Agree that the allocations will have a minor impact on biodiversity given that the locations are all currently managed as intensive farmland.</p> <p>The SA claim that there will be a minor positive effect on biodiversity from some of the proposed allocations is not a true reflection of the proposed allocations' impact on biodiversity or the delivery of a net gain in biodiversity. While the proposed allocations may not have an impact, it is inappropriate to say they have a positive impact compared to hypothetical alternative development elsewhere. Recommend that all the proposed allocations for which a minor positive impact is identified be reclassified as 'negligible effect likely'.</p>	
166/20	Helen	Marshall	CPRE Oxfordshire	Main	123	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			<p>The increase in overall housing numbers applied to the District as a whole (from 16,750 to 22,840) is even more exaggerated in the case of Bicester, which is supposed to increase its target by no less than 47% (6,894 to 10,129). CPRE is especially concerned over the downstream effects of increasingly rapid run off, which, with the growing intensity of rainfall events is unlikely to be properly mitigated by SUDS. And overall the inevitable major increase in road traffic stemming from all this development will result in a noticeable feeling of urbanisation in what is a predominantly rural district (SA para 1.137).</p> <p>The effect of setting such a target is addressed by the Sustainability Appraisal prepared by LUC. This states that too rapid and too large a scale of growth could (we would say will) place the services, facilities, and infrastructure of the town under (considerable) strain (SA para 1.74). The SA goes on to say that the cumulative effect of so much new housing will have a significant adverse effect through loss of greenfield and agricultural land, and is likely to have a similar adverse effect on air quality, biodiversity and landscape (SA para 1.136). Pressure on water resources and waste treatment will intensify (SA para 1.138).</p>
047/44	Matthew	Coyne	Banbury Town Council	Main	124					Support for the allocation of Higham way site (proposed Banbury 19)

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089/10	Charlotte	Kinnear	RSPB	Main	124	<p>The Submission Local Plan does not address the green space needs of the new allocations or impact of allocations on green space. Development of new areas will increase the imbalance between the amount of development and the amount of green space for existing and new residents. This imbalance exists taking into account planned new green space, partly because the Green Spaces Strategy is out of date.</p> <p>The Local Plan fails to recognise that much of the green space identified, including playing fields and sports pitches, is of little value for wildlife.</p> <p>Banbury's ecological network is weak with no Local Nature Reserves or biological SSSIs and only one proposed Local Wildlife Site. Some existing Green Space, eg Salt Way, will be significantly affected by proposed allocations.</p> <p>Natural England recommends there should be one hectare of Local Nature Reserve provision for every 1,000 people.</p>	<p>Update Cherwell Green Spaces Strategy 2008-2016 to take account of proposed new allocations so that all up to date information is included as expected in the NPPF, paragraph 73 .</p> <p>The Local Plan should protect and increase semi-natural habitat in step with planned new development in accordance with the NPPF, paragraphs 109 and 114.</p> <p>Use up to date information from the Phase 1 habitat mapping CDC commissioned TVERC to carry out last year, to identify new areas to promote enhancement and management of Banbury's few areas of semi-natural habitat to create new areas of high quality natural green space to buffer existing sites of importance or to provide stepping stones between these. See enclosed map for suggested sites and areas that might form the basis for a more ambitious vision for the town's natural green space linked to new allocations.</p>		<p>Agree that the allocations will have a minor impact on biodiversity given that the locations are all currently managed as intensive farmland.</p> <p>The SA claim that there will be a minor positive effect on biodiversity from some of the proposed allocations is not a true reflection of the proposed allocations' impact on biodiversity or the delivery of a net gain in biodiversity. While the proposed allocations may not have an impact, it is inappropriate to say they have a positive impact compared to hypothetical alternative development elsewhere. Recommend that all the proposed allocations for which a minor positive impact is identified be reclassified as 'negligible effect likely'.</p>	
166/21	Helen	Marshall	CPRE Oxfordshire	Main	124	<p>CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.</p>	<p>The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.</p>			<p>The increase in overall housing numbers applied to the District as a whole (from 16,750 to 22,840) is even more exaggerated in the case of Bicester, which is supposed to increase its target by no less than 47% (6,894 to 10,129). CPRE is especially concerned over the downstream effects of increasingly rapid run off, which, with the growing intensity of rainfall events is unlikely to be properly mitigated by SUDS. And overall the inevitable major increase in road traffic stemming from all this development will result in a noticeable feeling of urbanisation in what is a predominantly rural district (SA para 1.137).</p> <p>The effect of setting such a target is addressed by the Sustainability Appraisal prepared by LUC. This states that too rapid and too large a scale of growth could (we would say will) place the services, facilities, and infrastructure of the town under (considerable) strain (SA para 1.74). The SA goes on to say that the cumulative effect of so much new housing will have a significant adverse effect through loss of greenfield and agricultural land, and is likely to have a similar adverse effect on air quality, biodiversity and landscape (SA para 1.136). Pressure on water resources and waste treatment will intensify (SA para 1.138).</p>
186/15	Rob	Kinchin-Smith	Banbury Civic Society	Main	124					<p>The allocation of this site is supported. This site is linked to the extended Banbury 6 therefore the spine roads through Banbury 6 and Banbury 19 could be linked to one another, so as to provide a useful addition to the local road network, whether or not the South-to-East link road is built.</p>
234/1	Charlotte	O'Mahony	JSA Planning / Grondon Waste & Cemex limited	Main	124					<p>Support the inclusion of Higham Way in the Local Plan</p>
234/2	Charlotte	O'Mahony	JSA Planning / Grondon Waste & Cemex limited	Main	124		<p>The number of dwellings expressed in the Policy should be used as a guide and not operate as a cap.</p>			<p>Concern is raised over how the total housing yield has been calculated and it is suggested that the site is capable of delivering in excess of 200 dwellings. It is assumed that the figure in the Local Plan is based on the Montagu Evans viability report which is based on high level assumptions with little knowledge of site specific issues. Detailed masterplanning is the most appropriate way of ascertaining the number of units the site can deliver to ensure the supply of housing in Cherwell is boosted in accordance with the NPPF.</p>

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234/3	Charlotte	O'Mahony	JSA Planning / Grondon Waste & Cemex limited	Main	124		The Policy should read - ' <u>Dwelling mix - to be justified on assessment of market demand</u> '			The draft policy is too prescriptive in terms of the dwelling mix. Given the sites sustainable location and that nearby developments contain a high proportion of flats the proportion of flats in a scheme would be higher on the site.
234/4	Charlotte	O'Mahony	JSA Planning / Grondon Waste & Cemex limited	Main	124		Amend the policy to read '30% subject to viability assessment'			Due to the anticipated cost of remediating the site the affordable housing requirement should be amended. Given the Council's purchase of the Graven Hill site, which will deliver the U.K's first self build community and the likely costs of remediating contaminated land it is not a viable location for community self build.
254/5	Mark	Mathews	Thames Water	Main	124					Thames Water has no comments to make on the main modifications or IDP text. It does not envisage infrastructure concerns regarding Water Supply capability at Higham Way, Banbury. The wastewater networks are unlikely to be able to support the demand anticipated from Higham Way. Drainage infrastructure is likely to be required. A drainage strategy would be required from the developer. If upgrading is required there could be a delay of up to 3 years for delivery unless the developer requisitions the infrastructure.
300/16	Penny	Silverwood	Berks, Bucks and Oxon Wildlife Trust (BBOWT)	Main	124		The policy should include reference to the Green Infrastructure links being designed to incorporate biodiversity enhancements and connectivity of ecological networks in line with NPPF.			Support bullet points 7 (Green Infrastructure) and 9 (biodiversity enhancement) under Key site specific design and place shaping principles.
061/33	Alan	Lodwick		Main	124	Objects to the use of the SHMA figures to inform the Local Plan.	All Modifications relating to the SHMA should be deleted.			
301/82	Bev	Hindle	Oxfordshire County Council	Main	124	Policy Banbury 19 – Land at Higham Way Amend 'Key site specific design and place shaping principles' The town centre is not easily accessible on foot, especially for the elderly/disabled, being about 1km distant along narrow footpaths and requiring two major roads to be crossed. Whilst there is reasonably good pedestrian access to trains across the station footbridge, there is no simple way of providing good access to buses. There is no opportunity for buses to serve Higham Way, unless a new link road is provided through to the Overthorpe Road industrial area. It has previously proved impossible to provide bus stops near to the Higham Road/Bridge Street/Middleton Road junction, so the nearest bus stops would be 550 metres distant at Grimsbury Co-op.	The words "movement study" should be changed to " <u>movement strategy</u> ". The current highway layout in the area precludes the provision of any bus service. A connecting road to the Overthorpe Road industrial area is required. The site is also severed from the Canalside area (Banbury 1) and its many opportunities for new residents. Some form of bridge is required.			
166/22	Helen	Marshall	CPRE Oxfordshire	Main	125	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			The increase in overall housing numbers applied to the District as a whole (from 16,750 to 22,840) is even more exaggerated in the case of Bicester, which is supposed to increase its target by no less than 47% (6,894 to 10,129). CPRE is especially concerned over the downstream effects of increasingly rapid run off, which, with the growing intensity of rainfall events is unlikely to be properly mitigated by SUDS. And overall the inevitable major increase in road traffic stemming from all this development will result in a noticeable feeling of urbanisation in what is a predominantly rural district (SA para 1.137). The effect of setting such a target is addressed by the Sustainability Appraisal prepared by LUC. This states that too rapid and too large a scale of growth could (we would say will) place the services, facilities, and infrastructure of the town under (considerable) strain (SA para 1.74). The SA goes on to say that the cumulative effect of so much new housing will have a significant adverse effect through loss of greenfield and agricultural land, and is likely to have a similar adverse effect on air quality, biodiversity and landscape (SA para 1.136). Pressure on water resources and waste treatment will intensify (SA para 1.138)

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301/83	Bev	Hindle	Oxfordshire County Council	Main	125	Policies for Cherwell's Places: Kidlington - New para C.188b This modification is supported: "Due to a lack of spare education capacity in the town, expansion of one of the existing primary schools will be required over the plan period and developer contributions will be sought."				
242	Tom	Surman		Main	126	I object to the review of the of the green belt around Kidlington. Kidlington being the largest village in England is already big enough, more houses would put a massive strain on schooling, the medical centre and shops. Also there would be a massive increase in traffic, bearing in mind the new train station to which we would be unaware of it's impact until it's opening. There would also be a big impact to the local wildlife.				
151/9	Jan	Molyneux	Stephen Bowley Planning Consultancy / Shipton Ltd	Main	126	Excess employment and housing requirement for Kidlington and North Oxford	The identification of a significant area of development at Shipton on Cherwell Quarry			
166/23	Helen	Marshall	CPRE Oxfordshire	Main	126	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			<p>The increase in overall housing numbers applied to the District as a whole (from 16,750 to 22,840) is even more exaggerated in the case of Bicester, which is supposed to increase its target by no less than 47% (6,894 to 10,129). CPRE is especially concerned over the downstream effects of increasingly rapid run off, which, with the growing intensity of rainfall events is unlikely to be properly mitigated by SUDS. And overall the inevitable major increase in road traffic stemming from all this development will result in a noticeable feeling of urbanisation in what is a predominantly rural district (SA para 1.137).</p> <p>The effect of setting such a target is addressed by the Sustainability Appraisal prepared by LUC. This states that too rapid and too large a scale of growth could (we would say will) place the services, facilities, and infrastructure of the town under (considerable) strain (SA para 1.74). The SA goes on to say that the cumulative effect of so much new housing will have a significant adverse effect through loss of greenfield and agricultural land, and is likely to have a similar adverse effect on air quality, biodiversity and landscape (SA para 1.136). Pressure on water resources and waste treatment will intensify (SA para 1.138).</p>
166/37	Helen	Marshall	CPRE Oxfordshire	Main	126	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.				<p>There are no special circumstances which can be demonstrated to justify small local reviews of the Green Belt, and that by introducing their possibility the Council will open itself to a welter of applications to develop within the Green Belt based on imagined "special circumstances" driven solely by a desire for commercial advantage.</p> <p>The planned industrial and residential developments at Oxford's Northern Gateway and at Bicester seem to provide more than adequate relief for any needs Kidlington may have in the Plan period. Added to this the proposal for Woodstock to expand by a 1,500 dwellings to be built on land south of Perdiswell Farm on the Shipton on Cherwell road (scoping application 14/00049/SCOP - received just after the Local Plan modifications were issued, but not included in those modifications), suggests that any additional housing requirements in the vicinity of Kidlington are not going to be an issue.</p>

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201/4	Debbie	Dance	Oxfordshire Preservation Trust	Main	126	Objects to the Council's approach to development in the Oxford Green Belt. Acknowledge the SHMA and Duty to Cooperate however there is no agreement that the Oxford Green belt should be reviewed on a small or strategic scale in order to allow land within it to be released for development. Proposal for a small scale Green Belt review at Kidlington is not justifiable or acceptable. Suitable and brownfield sites should be continued to be use where possible.	Remove modification and reinstate text " <u>At the current time it is neither considered that the 'exceptional circumstances' required by government policy exist to justify a small scale local review of the Green Belt to meet local needs</u> ". And remove " if the village's local needs cannot be accommodated within the built up area a small scale local review of the Green Belt boundary around Kidlington will be undertaken as part of Local Plan Part 2 as indicated in Policy ESD 14. "			
207/6	Jacqueline	Mulliner	Terence O'Rourke Ltd / Blenheim Palace Estate	Main	126	No justification for an amended spatial distribution of homes and that the Plan, as drafted and modified, will not contribute to the aims and objectives of sustainable development if such a restrictive approach is applied to Kidlington. Oppose to the term small scale Green Belt review with reference to Kidlington. Oppose the reference solely to the village's housing needs.	Revise reference from " small-scale " to " <u>moderate-scale</u> " review of the Green Belt. Replace references to " <u>local housing needs</u> " with " <u>housing needs necessary to support economic growth and the achievement of sustainable development.</u> "			
223/4	Patricia	Redpath	Kidlington Parish Council	Main	126					The Parish Council is concerned about the change in position regarding the sentence "further small scale local review of the green belt boundary around Kidlington will also be undertaken as part of Local plan part 2 if the villages local needs cannot be accommodated within the built up area" and continues to take the view that the Green Belt around Kidlington should be protected but is inclined to accept that the logic of the modification, given that an insufficient number of possible development sites have been identified within the village boundaries and subject to completion of a local housing needs assessment. However the Parish Council is seeking reassurance on how Kidlington's housing needs will be assessed and a decision reached on whether the local review of the Green Belt will be necessary. It also takes the view that while any Green Belt should only be concerned with Kidlington's housing needs, it should address all possible options for meeting them. Require confirmation that these issues will be addressed in a dialogue with the Council through the masterplan process.
229/18	Nik	Lyzba	JPPC / The Tripartite (Oxford University, Merton College and R.Smith)	Main	126		Anticipated development needs at BSP would require a 4 fold increase in the site area which would need to be reflected in the draft Plan.			The Council proposes a further limited review of the green belt boundaries around Kidlington in order to meet "local housing need". It accepts that such housing needs are able to constitute the "exceptional circumstances" required to justify alterations to existing green belt boundaries. Given this approach. Such a review should form part of this draft Plan in order to meet local housing needs. The need for the inclusion of a limited review of the green belt around Begbroke Science Park is supported. Currently, the University expects that its planned and anticipated development needs at BSP would require a 4 fold increase in the site area which would need to be reflected in the draft Plan.
264/7	Andrew	Hornsby-Smith		Main	126			Supports these modifications which allow for the possibility that whilst the initial purpose of the local Green Belt review is for employment, a later review could encompass the remainder of the area of search once Kidlington's local housing need has been assessed further. This is highly likely to trigger the need for a local Green Belt review.		

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267/1	Richard	Cutler	Bloombridge	Main	126	Site- THE MOORS, KIDLINGTON (SHLAA site K1081): This sites performs extremely well in relation to other sites that have been put forward since June and the Plan would be more effective and better justified if a strategic housing site of 300 houses is identified as an opportunity in Kidlington.	Oxford Technology Park will provide an economic and employment stimulus but this needs to be matched by a strategy which recognises the housing potential of Kidlington to maintain the balance and assist in regeneration. If the need for more housing is established, land north of the Moors should be allocated for immediate release.		The SA should be re-run with the Moors specifically assessed, based on the established database.	The objector agrees with the Council that a strategic review of the Green Belt or development in the Green Belt strategic gaps to the south and west of Kidlington are not required. Land north of the Moors is well located in relation to the town centre and Langford Lane employment area, is well contained physically and visually, with the flood plain to the east containing a long term defensible Green Belt boundary. The site would help deliver the objectives of the masterplan.
179/47	Matthew	Bates	Oxford City Council	Main	126	Object that the Plan now provides a policy mechanism for reviewing the Green Belt around Kidlington to meet "local" housing need, relating to the increase in the rural housing allocation, whilst not recognising that this is also part of, and inseparable from, the wider needs of the HMA.	If the Plan were to progress, the City Council insists that references to 'local' Green Belt reviews are deleted and instead text introduced into Policy ESD14 and supporting text to set out a timetable for a strategic joint review of the Green Belt, should this be necessary (as expected) to meet both Cherwell's housing needs and those of the wider HMA (detailed suggestions provided)			
179/48	Matthew	Bates	Oxford City Council	Main	126	Para C.190 - Consequential changes needed because of the need for change to Policy ESD 14: i.e. to ensure regard is had to the intended permanence of the Green Belt boundary, and to take account of the pressures within, and wider needs of, the housing market area.	Amend Para C.190 as follows: As an urban area close to Oxford and a number of other villages, Kidlington is surrounded by Green Belt. The Cherwell District Council consider that the Local Plan's housing requirements and development strategy can be achieved without the need for a strategic review of the Green Belt in the district <u>in the short term. However given the extent of unmet housing need identified in the Housing Market Area as a whole (and in particular in Oxford), and to provide a contingency strategy should other strategic growth locations not deliver housing at the rate hoped for, an assessment of the Green Belt will be undertaken jointly with the other Oxfordshire local authorities, potentially leading to a review of Green Belt boundaries which would be incorporate into an early review of the Cherwell Local Plan (see Policy PSD2).</u>			
179/48	Matthew	Bates	Oxford City Council	Main	126	Para C.190 - Consequential changes needed because of the need for change to Policy ESD 14: i.e. to ensure regard is had to the intended permanence of the Green Belt boundary, and to take account of the pressures within, and wider needs of, the housing market area.	Cont....In terms of local housing need, small scale affordable housing schemes to meet specifically identified local housing need may be met through the release of rural exception sites (Policy Villages 3) and the Kidlington Framework Masterplan will also help identify opportunities. If the village's local housing needs cannot be accommodated within the built up area a small scale local review of the Green Belt boundary around Kidlington will be undertaken as part of Local Plan Part 2 a wider strategic Green Belt review, as indicated in Policy ESD 14.			
179/49	Matthew	Bates	Oxford City Council	Main	126	Objects to provision for "small-scale" Green Belt reviews in this area whilst ignoring the need for a wider strategic Green Belt review having regard to the intended permanence of Green Belt boundaries. The 'exceptional circumstances' that are now considered to exist are not set out.	Insert reference to the exceptional circumstances including meeting the wider needs of the housing market area as well as the local housing needs of Kidlington.			

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166/24	Helen	Marshall	CPRE Oxfordshire	Main	127	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			<p>The increase in overall housing numbers applied to the District as a whole (from 16,750 to 22,840) is even more exaggerated in the case of Bicester, which is supposed to increase its target by no less than 47% (6,894 to 10,129). CPRE is especially concerned over the downstream effects of increasingly rapid run off, which, with the growing intensity of rainfall events is unlikely to be properly mitigated by SUDS. And overall the inevitable major increase in road traffic stemming from all this development will result in a noticeable feeling of urbanisation in what is a predominantly rural district (SA para 1.137).</p> <p>The effect of setting such a target is addressed by the Sustainability Appraisal prepared by LUC. This states that too rapid and too large a scale of growth could (we would say will) place the services, facilities, and infrastructure of the town under (considerable) strain (SA para 1.74). The SA goes on to say that the cumulative effect of so much new housing will have a significant adverse effect through loss of greenfield and agricultural land, and is likely to have a similar adverse effect on air quality, biodiversity and landscape (SA para 1.136). Pressure on water resources and waste treatment will intensify (SA para 1.138).</p>
205/1	Nik	Lyzba	JPPC / Oxford University Press	Main	127	Support the proposed review of the Green Belt boundaries in Langford Lane. Concerned about the reference to "Oxford Technology Park" which is an undeveloped area of land with no planning permission for a technology park. The term used could be taken to pre-judge which areas of land should be excluded from the changes proposed, the area of land to which the policy relates being identified on the Key Policies Kidlington map.				
207/8	Jacqueline	Mulliner	Terence O'Rourke Ltd / Blenheim Palace Estate	Main	127	The addition of reference to Oxford Technology Park, in terms of the GreenBelt review to accommodate employment provision, fails to respond positively to our previous representations. The Economic Analysis considers planned economic growth and identifies a land requirement at Kidlington of 12.4ha. This supports an extension of the Green Belt review beyond that which is currently identified. This could now consider mixed-use development.	Extend the area for Green Belt review. Make reference to the potential for mixed-use development, in accordance with the evidence base.			
229/19	Nik	Lyzba	JPPC / The Tripartite (Oxford University, Merton College and R.Smith)	Main	127					Reference to "associated ancillary uses" currently relates solely to the airport site. It is essential that support facilities should be provided in association with additional development at BSP. This should be recognized in the policy. Such ancillary uses may also need to embrace some key worker accommodation.
232/7	Matthew	Hayes	GVA / Oxford Aviation Services	Main	127					Support mod 127 in terms of amendments including allowing for associated ancillary uses.
179/50	Matthew	Bates	Oxford City Council	Main	127	Object that the Plan now provides a policy mechanism for reviewing the Green Belt around Kidlington to meet "local" housing need, relating to the increase in the rural housing allocation, whilst not recognising that this is also part of, and inseparable from, the wider needs of the HMA.	If the Plan were to progress, the City Council insists that references to 'local' Green Belt reviews are deleted and instead text introduced into Policy ESD14 and supporting text to set out a timetable for a strategic joint review of the Green Belt, should this be necessary (as expected) to meet both Cherwell's housing needs and those of the wider HMA (detailed suggestions provided).			
179/51	Matthew	Bates	Oxford City Council	Main	127	The approach to the Oxford Green Belt is inconsistent and flawed: it does not comply with the NPPF. The exceptional circumstances justifying a review of Green Belt in the Kidlington area to meet "local" housing needs have not been properly articulated nor applied consistently. No regard is had to the intended permanence of the Green Belt boundary given that the wider cross-boundary needs of the housing market area, in particular Oxford, have not been considered. Cherwell has not been prepared to engage with the City Council on a strategic review of the Green Belt in the light of Oxford's assessed housing need.				

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179/52	Matthew	Bates	Oxford City Council	Main	127	Policy Kidlington 1 - Consequential changes needed because of the need for change to Policy ESD 14: i.e. to ensure regard is had to the intended permanence of the Green Belt boundary, and to take account of the pressures within, and wider needs of, the housing market area.	Amend first part of policy to read as follows: We <u>As part of a wider strategic review addressing cross-boundary needs, we</u> will undertake a small scale local review of the Green Belt to accommodate identified high value employment needs at two distinct and separate locations:...			
166/25	Helen	Marshall	CPRE Oxfordshire	Main	128	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			<p>The increase in overall housing numbers applied to the District as a whole (from 16,750 to 22,840) is even more exaggerated in the case of Bicester, which is supposed to increase its target by no less than 47% (6,894 to 10,129). CPRE is especially concerned over the downstream effects of increasingly rapid run off, which, with the growing intensity of rainfall events is unlikely to be properly mitigated by SUDS. And overall the inevitable major increase in road traffic stemming from all this development will result in a noticeable feeling of urbanisation in what is a predominantly rural district (SA para 1.137).</p> <p>The effect of setting such a target is addressed by the Sustainability Appraisal prepared by LUC. This states that too rapid and too large a scale of growth could (we would say will) place the services, facilities, and infrastructure of the town under (considerable) strain (SA para 1.74). The SA goes on to say that the cumulative effect of so much new housing will have a significant adverse effect through loss of greenfield and agricultural land, and is likely to have a similar adverse effect on air quality, biodiversity and landscape (SA para 1.136). Pressure on water resources and waste treatment will intensify (SA para 1.138).</p>
166/26	Helen	Marshall	CPRE Oxfordshire	Main	129	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			<p>The increase in overall housing numbers applied to the District as a whole (from 16,750 to 22,840) is even more exaggerated in the case of Bicester, which is supposed to increase its target by no less than 47% (6,894 to 10,129). CPRE is especially concerned over the downstream effects of increasingly rapid run off, which, with the growing intensity of rainfall events is unlikely to be properly mitigated by SUDS. And overall the inevitable major increase in road traffic stemming from all this development will result in a noticeable feeling of urbanisation in what is a predominantly rural district (SA para 1.137).</p> <p>The effect of setting such a target is addressed by the Sustainability Appraisal prepared by LUC. This states that too rapid and too large a scale of growth could (we would say will) place the services, facilities, and infrastructure of the town under (considerable) strain (SA para 1.74). The SA goes on to say that the cumulative effect of so much new housing will have a significant adverse effect through loss of greenfield and agricultural land, and is likely to have a similar adverse effect on air quality, biodiversity and landscape (SA para 1.136). Pressure on water resources and waste treatment will intensify (SA para 1.138).</p>
144/7	Theresa	Goss	Bloxham Parish Council	Main	130	This makes the assumption that all village schools are capable of expanding. There is no contingency if the village school is unable to expand. Village Schools need to retain their rural character.	To remove Bloxham from Category A and place in Category C due to the unprecedented number of recent permissions. These developments have excluded Bloxham from either "servicing" it's satellite villages or enabling residents of Bloxham to access Primary Education if the parental choice is the village school If Bloxham cannot be recategorised then the Local Plan must reflect somewhere that Bloxham should not be considered for any development other than infill and conversions for at least 11 years			

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166/27	Helen	Marshall	CPRE Oxfordshire	Main	130	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The Plan should revert to the rate of growth (already very ambitious) envisaged in the Submission Local Plan.			The increase in overall housing numbers applied to the District as a whole (from 16,750 to 22,840) is even more exaggerated in the case of Bicester, which is supposed to increase its target by no less than 47% (6,894 to 10,129). CPRE is especially concerned over the downstream effects of increasingly rapid run off, which, with the growing intensity of rainfall events is unlikely to be properly mitigated by SUDS. And overall the inevitable major increase in road traffic stemming from all this development will result in a noticeable feeling of urbanisation in what is a predominantly rural district (SA para 1.137). The effect of setting such a target is addressed by the Sustainability Appraisal prepared by LUC. This states that too rapid and too large a scale of growth could (we would say will) place the services, facilities, and infrastructure of the town under (considerable) strain (SA para 1.74). The SA goes on to say that the cumulative effect of so much new housing will have a significant adverse effect through loss of greenfield and agricultural land, and is likely to have a similar adverse effect on air quality, biodiversity and landscape (SA para 1.136). Pressure on water resources and waste treatment will intensify (SA para 1.138).
075/1	R. E	Everitt		Main	130		This should be recognised in the Local Plan.			Conversions and infilling in villages will lead to a need for new primary school buildings. (It is highlighted that documents were not available at a mobile library.)
301/84	Bev	Hindle	Oxfordshire County Council	Main	130	Our Villages and Rural Areas – Supporting Text C.205 Although this modification is welcomed, it should be noted that some village schools will be very difficult to expand in a sustainable manner. Where this is the case, development should contribute to the provision of school places in nearby villages or towns.	Amend wording as follows: "A lack of school places, meaning that housing developments might require <u>the expansion of schools in villages or nearby towns</u> . An assessment of education provision will need to inform development proposals".			
144/8	Theresa	Goss	Bloxham Parish Council	Main	134	Bullet point 3 - Provision of Affordable housing to meet local village housing need would be sound, as identified by the village Neighbourhood Plans. Bullet 4 - The relationship between "cluster" villages is vital part of rural heritage. The "cluster " villages look to the larger village to provide the facilities in close proximity rather than travel to a town.	Amend bullet point 3: " <u>Provide Affordable housing to meet local village housing need, as identified by the village Neighbourhood Plans</u> ". Bullet point 4 needs greater emphasis to be placed on not destroying this relationship.			
301/85	Bev	Hindle	Oxfordshire County Council	Main	134	Our Villages and Rural Areas – Supporting Text C.210	Add: <u>provide funding for enhanced bus services along the main inter-urban routes, on a proportionate basis.</u>			
144/9	Theresa	Goss	Bloxham Parish Council	Main	135	Bloxham should not be a Category A village due to the level of recent developments. Bloxham is no longer a sustainable village and could only now support infill and conversions. Bloxham should be in Category C as it could accept infill, conversion and some minor development of up to 10 dwellings. Bloxham would not be sustainable to be in Category A and considered for a share of larger scale development of more than 10 dwellings to meet the 750 target. In particular because there is no upper limit to the larger scale development figure.	Bloxham should be included as a Category C village.			
178/8	Suzanne	Bangert	Terrance O'Rurke / Mr & Mrs Ashworth	Main	135			We support the proposed amendment to Category C villages to allow not only conversions but also infilling which will provide greater flexibility in the smaller villages to provide sustainable development which will enhance the vitality of rural communities in accordance with the requirements of the NPPF.		

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178/9	Suzanne	Bangert	Terrance O'Rourke / Mr & Mrs Ashworth	Main	135		Policy Villages 1 provides a categorisation of villages to guide the consideration of small-scale proposals for residential development within and adjacent to the built-up limits of settlements. Village categorisation helps understand which villages are in principle best placed to sustain different levels of residential development. The Policy ensures that unanticipated development within and adjacent to the built-up limits of a village is of an appropriate scale for that village is supported by services and facilities and does not unnecessarily exacerbate travel patterns that are overly reliant on the private car and which incrementally have environmental consequences. Policy Villages 1 Village categorisation therefore seeks to manage small scale development proposals (typically but not exclusively for less than 10 dwellings) which come forward within and adjacent to the built-up limits			Whilst we welcome the proposed amendment to Policy Villages 1 that will enable infill development as well as conversions we consider that there are likely to be suitable opportunities to provide small-scale development on the edge of villages such as Merton. Accordingly limiting residential development to that located within the built-up limits of settlements is not appropriate and is likely to hamper the provision of new housing within the rural area to meet local need or to realise a community's aspiration, such that the proposed housing strategy and delivery of housing may not be achieved. Accordingly we do not consider this element of Policy Villages 1 to be positively prepared or effective nor in compliance with the NPPF which promotes housing in locations which enhance or maintain the vitality of rural communities.
137/8	Theresa	Goss	Adderbury Parish Council	Main	136	The categorisation is not realistic based on the limited facilities the village possesses. For a village to be sustainable it has to have a basic level of services, easily accessible from each part of the village.				There are insufficient places at the primary school, the shop provides limited supplies and the post office is only available for 10 hours a week.
144/10	Theresa	Goss	Bloxham Parish Council	Main	136	The evidence that provides for the sustainability of village categorisation is flawed. The survey of villages is a desk top exercise and does not reflect actual availability of services. This should not be used to determine whether a village is supported by services and facilities and appropriate for development. E.g. Bloxham Primary School is currently not able to accept all pupils from Bloxham residents.	To remove Bloxham from Category A and place in Category C due to the unprecedented number of recent permissions. These developments have excluded Bloxham from either "servicing" it's satellite villages or enabling residents of Bloxham to access Primary Education if the parental choice is the village school. If Bloxham cannot be recategorised then the Local Plan must reflect somewhere that Bloxham should not be considered for any development other than infill and conversions for at least 11 years.			
160/1	Jan	Molyneux	Molyneux Planning / Zagora Holdings	Main	136		The reference to under 10 should be removed and "up to and greater than 10" included within the policy.			The Policy aims to restrict development within Policy 1 Villages generally to under 10 houses. This does not take reasonable account of the capacity of each site.
160/1	Jan	Molyneux	Molyneux Planning / Zagora Holdings	Main	136	The Policy aims to restrict development within Policy 1 Villages generally to under 10 houses. This does not take reasonable account of the capacity of each site	The reference to under 10 should be removed and "up to and greater than 10" included within the policy [a plan showing land at Finmere accompanies the representation]			
229/20	Nik	Lyzba	JPPC / The Tripartite (Oxford University, Merton College and R.Smith)	Main	136					Comment is made in respect of these solely to draw attention to the lack of consideration having been given to the reasonable alternative of development in the green belt. Such development would have advantages over the provision of additional development in a number of the villages set out in the policy.
137/9	Theresa	Goss	Adderbury Parish Council	Main	137	The categorisation is not realistic based on the limited facilities the village possesses. For a village to be sustainable it has to have a basic level of services, easily accessible from each part of the village.				There are insufficient places at the primary school, the shop provides limited supplies and the post office is only available for 10 hours a week.
144/11	Theresa	Goss	Bloxham Parish Council	Main	137	Has "the level of service provision" in Bloxham been ignored when categorising it through updated CRAITLAS. This only showed in a tick box exercise that a facility was present in the village. No analysis of the capacity for provision to residents present or future of both the village and satellite villages.				
137/10	Theresa	Goss	Adderbury Parish Council	Main	138	The satellite village of Milton is in the same position as the majority of Adderbury, in that it does not have adequate access to services in Adderbury.				
144/12	Theresa	Goss	Bloxham Parish Council	Main	138	There is a danger if this course was followed that satellite villages becoming residential only and residents driving to access all facilities.				

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004	Alan	Plumb	Milton Village Meeting	Main	139	Incorrect information used for Milton in the Village Categorisation Update 2014. Milton does not have any recreational facilities; the Public House kitchen is closed and the owner has no plans to re-open it; Population is 164 and not 192 (error may have been caused by including the caravan park, a separate community elsewhere in the Parish); the bus service is once a week to Banbury leaving 10.12 and returning 13.13, leaving insufficient time to shop; the bus service does not pass a supermarket or provide people with an alternative to the private car to other villages. Whilst Milton could find locations for infilling and conversions within built	Milton should be removed from Category B, Satellite Villages to Category C, All Other Villages. Infilling and Conversions should only be acceptable. The Council should comply with its Statement of Community Involvement, taking note of the Milton 2014 'Village Appraisal' results, and to comply with its 'Policy Implications' Statement Clause 24.		No comment	
120	Theresa	Goss	Milcombe Parish Council	Main	139		The future development of Milcombe must be restricted to limited infill, and not the level expected of a Category A village.			Major concerns over the change in the status of Milcombe from a Category B to a Category A village. An explanation is needed for the change, in terms of scoring. Milcombe, like other 'satellite villages', is almost devoid of amenities and is totally reliant on Bloxham for services such as schools, doctor's surgery, etc. Due to the proposed development of Bloxham, these services will, in the future, be woefully inadequate. Access to 'service centres', such as Bloxham, Banbury and Chipping Norton, is restricted to the A361, which is now inadequate for the present, let alone future, traffic volume. The roads within the village are narrow, and further restricted by local parked vehicles; the recently completed estate at Oak Farm is already experiencing problems with regard to access and parking, as was predicted at the planning stage. Other service facilities such as electricity, water and sewage, are already overstretched, leading to poor service quality.
199/4	Huw	Mellor	Kemp & Kemp / Mano Oak Homes	Main	139		Clarification needed between Category A and B villages and how minor development should be applied. Suggested amendment: "Proposals for residential development in Category A villages within the built up limits of villages (including Kidlington) will be considered having regard to the categorisation below. <u>Proposals in Only Category A (Service Centres) will be considered on their merits and on a site by site basis.</u> Category B (Satellite Villages) will be considered to be suitable for minor development in addition to infilling and conversions." In the table under 'Type of Development', " Minor Development " should be deleted and replaced with " <u>Considered on a Site by Site Basis</u> ".			There is discrepancy between proposed Modification 9 and proposed Modification 139 in regard to development in Category B villages. Modification 139 states that Category A and B villages could accept minor development however Modification 9 shows minor development only in Category A villages.
098/1	John	Braithwaite	South Newington Parish Council	Main	139	South Newington is unsuitable for 'minor development' and should no longer be regarded as a 'satellite village of Bloxham for the following reasons: 1. The extent of recently built and approved development in Bloxham means it is no longer an effective service village for South Newington as there is a lack of capacity of critical services - education and health; the A361 is unsafe for walking and cycling (there is no paved footpath to Bloxham); and limited parking. 2. Poor public transport	Move South Newington from Category B 'Satellite Villages' to Category C 'All Other Villages'. This will make the Local Plan sound by recognising the limitations on development in South Newington imposed by the future nature of Bloxham as a centre for essential services to South Newington, infrastructure and physical constraints of the village and the likely interaction between these and current and emerging CDC planning policy.			
137/11	Theresa	Goss	Adderbury Parish Council	Main	139	Whilst category B and satellite villages have been added to the distribution of minor development, it does not make the principle of categorisation coherent and make those villages with limited services no more sustainable. Coalescence of villages will occur and they will become urban, destroying their setting and character.				
144/13	Theresa	Goss	Bloxham Parish Council	Main	139	Bloxham is currently in Category A, as a "service village". Bloxham is unable to provide the "services" implicit in this categorisation, e.g. As Bloxham Primary School and GP surgery are at capacity. Category B villages earlier do not include minor development.	To remove Bloxham from Category A and place in Category C due to the unprecedented number of recent permissions. These developments have excluded Bloxham from either "servicing" it's satellite villages or enabling residents of Bloxham to access Primary Education if the parental choice is the village school. If Bloxham cannot be categorised then the Local Plan must reflect somewhere that Bloxham should not be considered for any development other than infill and conversions for at least 11 years.			

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153/4	Jan	Molyneux	Stephen Bowley Planning Consultancy / U Stay Ltd	Main	139	Shipton should be identified within the classification of villages as a Class B villages, being a satellite of Kidlington.	Shipton should be identified within the classification of villages as a Class B villages, being a satellite of Kidlington.			
160/2	Jan	Molyneux	Molyneux Planning / Zagora Holdings	Main	139		Policy 1 villages should be stated as such and their requirement to operate as service centres (Mod 143) should not be a primary consideration of a site's suitability for development			The categorisation of villages to include their satellite villages will over complicate the delivery of the plan
160/2	Jan	Molyneux	Molyneux Planning / Zagora Holdings	Main	139	The categorisation of villages to include their satellite villages will over complicate the delivery of the plan.	Policy 1 villages should be stated as such and their requirement to operate as service centres (Mod 143) should not be a primary consideration of a site's suitability for development.			
198/4	Huw	Mellor	Kemp & Kemp / Newcore Capital Management	Main	139					Site - Land at Bletchingdon Road, Islip. The site measures approximately 13.5ha and could accommodate approximately 50 dwellings. The site could offer logical expansions to the Category C villages, strengthening the vitality and viability of the rural areas. The nearby railway line and station is being upgraded, which further improves the sites sustainability. The site is within the Green Belt yet outside of any other areas of planning constraint. Category C villages should not be restricted to infilling and conversions as this is not considered to be the correct approach as there are sustainable sites, to the edges of these smaller settlements, which are wrongly excluded as a result.
244/1	Simon	Turner	Launton Parish Council	Main	139	Lower Heyford appears in both the Category A (Service Villages) and Category B (Satellite Villages) lists! Which is it?	Remove Lower Heyford from whichever category it has been erroneously added to.			
252/3	Jan	Gillespie	Carter Jonas / of the Oxford Diocesan Board of Finance	Main	139			Fully support the proposed identification of Bloxham, Fritwell, Sibford Gower and Steeple Aston as Category A villages. The villages of Bloxham, Fritwell, Sibford Gower and Steeple Aston perform well against these criteria and we fully endorse their continued identification as Category A villages.		
256/4	Mr & Mrs	Facon		Main	139	There is little justification for grouping all of the varied 'Category A' villages together. It is not clear what the policy distinction is between Policies Villages 1 and Villages 2. Categorisation has not been properly undertaken. Less sustainable category B villages have now been included in category A and it is not clear why	Allocating specific housing numbers to each of the individual villages would be the ideal situation as per the previous version of the Plan. The Council should identify those villages that represent the most sustainable locations, using the evidence provided in the SHLAA Refresh, 2014, and by undertaking an updated Village Categorisation Assessment to create a 'Village Hierarchy' which establishes a clear preference for where development in rural areas will take place and then allocate a suitable, increased housing figure in Policy Villages 2 related to the sustainability of the village. Higher rural housing figures are needed. A Category A+ is suggested comprising Adderbury, Ambrosden, Chesterton, Deddington, Launton, Hook Norton and Bloxham.			
260/1	Jason	Hill	Savills / J W Tustian Estate	Main	139					Site- LAND adjacent to Oak Farm, Milcombe: On behalf of our client, we wish to support the soundness of the classification of Milcombe as Category A village (service centre). We consider that the village is a highly sustainable location for development. We confirm that our client's landholding, Land adjacent to Oak Farm (SHLAA 2014 Ref. M018) is available and capable of delivering a sustainable development in accordance with the criteria laid out in Modification 147 and in the SHLAA 2014 assessment of the site.

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261/1	Jason	Hill	Savills / J W Tustian Estate	Main	139					Site- Land at Grange Farm, Launton: On behalf of our client, we wish to support the soundness of the classification of Launton as Category A village (service centre) and the proposed distribution of housing across the rural areas. We consider that the village is a highly sustainable location for development. We confirm that our client's landholding, Land at Grange Farm (SHLAA 2014 Ref. LA012) is available and capable of delivering a sustainable development in accordance with the criteria laid out in Modification 147. We consider that the evidence on which this site was rejected under the SHLAA 2014 was unsound.
268/5	Darren	Bell	David Lock Associates / Hallam Land Management	Main	139	Policy Villages 1 is not wholly consistent with the NPPF which seeks to locate housing in sustainable locations and could be misleading as it does not mention the scope for development of 10 or more dwellings to meet the requirement of 750 dwellings in Policy Villages 2. The introduction of more villages into Category A could hinder delivery of additional dwellings required in the most sustainable locations.	Policy Villages 1 should be amended as follows: a) separately identifying Kidlington, Adderbury, Ambrosden, Chesterton, Deddington, Launton, and Hook Norton as well as other comparable villages considered to offer an equivalent level of sustainability, as suitable for development of 10 or more dwellings (subject to policy Villages 2 criteria). It should be made clear that this is in addition to minor, infilling and conversions. b) Identifying the other less sustainably villages currently shown in Category A as suitable for minor, infilling and conversion developments plus a small proportion of additional development (10 or more dwellings) in accordance with Policy Villages 2. There needs to be clear cross referencing between Policy Villages 1 and 2 for clarity. Consequential amendments will also be required for consistency and clarity, to Modifications 135, 136, 140 and other relevant paragraphs as necessary.			
272/4	Kevin	Ayrton	Carter Jonas / Pain family	Main	139					The continued identification of Chesterton as a category A village is supported.
061/34	Alan	Lodwick		Main	139	Objects to the use of the SHMA figures to inform the Local Plan.	All Modifications relating to the SHMA should be deleted.			
137/12	Theresa	Goss	Adderbury Parish Council	Main	140	The policy lacks coherence: it suggests that because category A and B villages will be required to accommodate minor development, categorisation does not matter, it is only what is defined as the most sustainable villages.				
144/14	Theresa	Goss	Bloxham Parish Council	Main	140	Rural Areas have to date contributed to 35% of the recent growth. Bloxham has already contributed to sufficient growth to the detriment of its sustainability. There needs to be a comprehensive and robust measure of the most sustainable village.	To remove Bloxham from Category A and place in Category C due to the unprecedented number of recent permissions. These developments have excluded Bloxham from either "servicing" it's satellite villages or enabling residents of Bloxham to access Primary Education if the parental choice is the village school. If Bloxham cannot be recategorised then the Local Plan must reflect somewhere that Bloxham should not be considered for any development other than infill and conversions for at least 11 years.			
061/35	Alan	Lodwick		Main	140	Objects to the use of the SHMA figures to inform the Local Plan.	All Modifications relating to the SHMA should be deleted.			
098/2	John	Braithwaite	South Newington Parish Council	Main	141			The proposed modifications will strengthen control over the form and scope of development in villages.		
137/13	Theresa	Goss	Adderbury Parish Council	Main	141	This is confusing. Does the first bullet point mean service provision within a village? If so it would rule out satellite villages. It infers that Category A villages without adequate service provision like Adderbury is based upon close proximity to Banbury. This makes Adderbury an urban village and the evidence base of services is inaccurate.				
144/15	Theresa	Goss	Bloxham Parish Council	Main	141	Has "the level of service provision" in Bloxham been ignored when categorising it through updated CRAITLAS? This only showed a tick box exercise in a facility being present in the village. Not an analysis of the capacity for provision to residents present or future of both the village and satellite villages.	The same consideration in this modification applied to Kidlington should be expanded to include all villages.			

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153/5	Jan	Molyneux	Stephen Bowley Planning Consultancy / U Stay Ltd	Main	141	The statement "careful consideration of" is unnecessary with reference to the appropriate scale of development. This also applies to Category B villages. In all instances the scale of development should be appropriate to the settlement.	Include more positive statements with regard to development within the rural areas.			
244/2	Simon	Turner	Launton Parish Council	Main	141	Given the level of increased rural housing required by the modified plan, there is now a considerable risk of coalescence between settlements arising from developments (both minor and major) in villages as well as from developments at Bicester and Banbury. Policy Villages 1 C.227 is now unsound because it fails to take account of Cherwell DC's stated aims on avoiding coalescence when assessing minor development proposals.	An additional bullet point should be added as follows: * whether the development risks coalescence with another settlement			
144/16	Theresa	Goss	Bloxham Parish Council	Main	142	This should be expanded to also be applicable to developments that involve demolishing a single dwelling and replacing with a disproportionate number that do not reflect the openness existing in village street.				
153/1	Jan	Molyneux	Stephen Bowley Planning Consultancy / U Stay Ltd	Main	142	Category C villages and the rural areas should include reference to redevelopment of previously used land.	Acknowledgement of the acceptability of the redevelopment of previously used land within he rural areas.	Acknowledgement of the acceptability of the redevelopment of previously used land within he rural areas.		
153/6	Jan	Molyneux	Stephen Bowley Planning Consultancy / U Stay Ltd	Main	142	Definition of infill - the policy change would restrict the number of suitable development sites within the rural areas without justification.	Allow for development within the rural areas on appropriate sites, without references to tightly phrased infill policies.			
178/9	Suzanne	Bangert	Terrance O'Rourke / Mr & Mrs Ashworth	Main	142		Amend proposed modification 142 a follows: Infilling refers to the development of a small gap in an otherwise continuous built-up frontage and to the development of appropriate small-scale sites on the edge of villages that is suitable for residential development. Not all infill gaps will be suitable for development. Many spaces in villages streets are important and cannot be filled without detriment to their character. Such gaps may afford views out to the landscape or help to impart a spacious rural atmosphere to the village. This is particularly important in a loose knit village pattern where the spaces may be as important as the buildings. Other development proposals may be supported to reinforce a settlements role and function, to meet a community need or to realise local community aspirations. These should be identified through a Neighbourhood Plan or process which demonstrates clear community support.			We consider that the definition of infilling should be more flexible as we consider that there are likely to be suitable opportunities to provide small-scale development on the edge of villages such as Merton. Accordingly limiting residential development to that located within the built-up limits of settlements is not appropriate and is likely to hamper the provision of new housing within the rural area. We do not consider this element of Policy Villages 1 to be positively prepared or effective nor in compliance with the NPPF which promotes housing in locations which enhance or maintain the vitality of rural communities
137/14	Theresa	Goss	Adderbury Parish Council	Main	143	The policy is flawed as Milton cannot use services Adderbury does not possess and the reality is its residents go elsewhere.				
144/17	Theresa	Goss	Bloxham Parish Council	Main	143	The "satellites" of Bloxham have now made it clear that overdevelopment of Bloxham has meant that it can no longer provide a "service centre" function, we agree with their sentiment.	Remove Bloxham from Category A.			
208/7	Alice	Kirkham	Persimmon Homes and Charles Church Midlands	Main	143	There are a number of villages that fall within Category A in Policy Villages 1 but are not included in this paragraph. E.g. Begbroke, Bodicote, Fritwell, etc.	The above list of villages should be included in this paragraph for clarity.			

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244/3	Simon	Turner	Launton Parish Council	Main	143	With the addition of the list of newly-designated Category A villages, the sense of the paragraph has changed considerably and it is now somewhat confusing. There are now two separate lists of Category A villages, (with and without satellite villages), but there are a further seven (or possibly eight) Category A villages that are not mentioned in either list, old Category A villages that do not perform as village cluster service centres. Restructuring of the text is required.	Either (a) Remove the final sentence "Arncott, Bletchingdon, Chesterton, Finmere, Fringford, Milcombe and Wroxton are Category A villages but do not have satellite villages.", or (b) Before the new final sentence starting "Arncott, Bletchingdon", insert a new sentence along the lines of "Begbroke, Bodicote, Fritwell, Hook Norton, Kidlington, Launton, [Lower Heyford] and Weston-on-the-Green have satellite villages but do not perform as service centres." (If any of these do not have satellite villages, they should instead be added to the sentence starting "Arncott, Bletchingdon".)			
061/36	Alan	Lodwick		Main	143	Objects to the use of the SHMA figures to inform the Local Plan.	All Modifications relating to the SHMA should be deleted.			
137/15	Theresa	Goss	Adderbury Parish Council	Main	144	The policy is flawed as Milton cannot use services Adderbury does not possess and the reality is its residents go elsewhere.				
153/7	Jan	Molyneux	Stephen Bowley Planning Consultancy / U Stay Ltd	Main	144	List of Category B villages - the list should include the village of Shipton, which, as a settlement within the immediate locality of Kidlington would be capable of assisting in the provision of housing within the locality.	Include the village of Shipton within the list of Category B villages.			
105/2	Paul	Butt	Paul Butt Planning Ltd / Altitude Real Estate LLP	Main	146	Allocation of 750 dwellings is not a insignificant number of homes in the Local Plan (Part 1), in the rural areas over and above a realistic windfall allowance of 754 homes of less than 10 dwellings.	Modification should be changed to give the Local Plan (Part 1) more flexibility in meeting the objectively assessed housing needs across the Local Plan (Part 1) area and allow for more than the specific ceiling of 750 homes to be provided at the Category A villages, such as at Arncott. The 'allocated' sites should be identified in Policy Villages 2, and this should include the SHLAA site AN025. The identification of these allocated sites are an integral part of the strategy for making provision for the identified objectively assessed housing needs over the plan period and the outcome should not be left to some future date. In the event that the identification of sites for the 750 homes is considered to be 'non strategic' and that sites ought to be identified at some future dates, SHLAA site AN025 ought to be reconsidered for inclusion in the Local Plan Part 2 as an allocated housing site taking into account the accompanying Landscape, Townscape and Visual Assessment. Alternatively to be considered through a Neighbourhood Plan or determination of an application for planning permission on the site.			
144/18	Theresa	Goss	Bloxham Parish Council	Main	146	No clear understanding of the implications of the phrase " an allocation" does this refer to the 750 referenced below it? Is there an additional figure to add to the 750 (10 or more) or 754 (10 or less.)? Kidlington appears in this modification but does not appear in Category A villages modification 143. Is it more appropriate that Kidlington is treated in a similar fashion to Upper Heyford, as it is referred to as having urban character?				
153/2	Jan	Molyneux	Stephen Bowley Planning Consultancy / U Stay Ltd	Main	146	The reduction in allowances for windfalls is not justified. Whilst the majority of housing allocations should be identified in the plan, this should don't be used as a means of refusing genuine windfall sites or as a restriction on the supply of rural housing	Significantly increase the level of windfall sites within the rural areas, without a subsequent reduction in other housing allocation			

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191/14	Michael	Robson	Cerda Planning Ltd / CALA Homes (Midlands) Ltd	Main	146		Reflect the need for distribution of housing in the rural area to reflect the role that each of the settlements play in the District, with greater housing to be attributed to locations such as Deddington and Bloxham.			Growth at larger centres can assist in meeting a number of sustainability principles but it must not be at the expense of the larger sustainable villages which provide an important network across Cherwell. Housing should be directed to locations where housing need is generated. The Taylor Review sets out important context to the issue of delivering development in sustainable rural locations. Housing cannot be delivered in Banbury at the rate required to meet housing needs. The Council have a history of failing to meet its housing targets. Over the period 2008-2013 the Council delivered on average 398 dwellings per annum and only 340 dwellings were delivered in 2012-13. The evidence points to the need for the Plan to look again at the distribution of housing, increase the housing numbers to provide choice and competition in the market and ensure that sufficient allocations are made particularly at Bicester and in the sustainable villages to ensure that the housing trajectory can genuinely be achieved. Policy Villages 2 limits 750 houses to 24 Category A settlements over a 17 year period which equates to less than 2 dwellings per annum per settlement on average.....
191/14	Michael	Robson	Cerda Planning Ltd / CALA Homes (Midlands) Ltd	Main	146		Reflect the need for distribution of housing in the rural area to reflect the role that each of the settlements play in the District, with greater housing to be attributed to locations such as Deddington and Bloxham.			Cont....This illustrates the low level of housing identified to the sustainable rural locations of the District and will not assist in addressing the important provisions set out within the Taylor Review. Not all the Category A villages exhibit the same level of sustainability credentials.
207/9	Jacqueline	Mulliner	Terence O'Rourke Ltd / Blenheim Palace Estate	Main	146	Do not consider that the increase in provision to Kidlington is sufficient to achieve sustainable development. A separate allocation of housing requirement should be apportioned specifically to Kidlington/Begbroke to reflect its role as a service centre and location of significant and growing employment opportunities.	Increase housing provision for the rural areas (including Kidlington) to 6,400 dwellings. Require at least 1,000 dwellings to be accommodated at Kidlington, through Green Belt review.			
208/8	Alice	Kirkham	Persimmon Homes and Charles Church Midlands	Main	146	A single housing allocation to the Category A villages, rather than splitting it up into separate groups within the category is welcomed. The increased provision for the rural areas is also welcomed. However this should be increased further. The current allocation of 750 dwellings to the Category A villages would represent a growth of approximately 4.4% to the number of households in this group of settlements in 2011.	It is considered that growth in the region of 10% to this category of settlements over the plan period would be appropriate.			
218/2	Jamie	Lewis	Hunter Page Planning / M&G UK PLP	Main	146	Welcomes the increase in housing for Policy Villages 2 to 750 dwellings at Category A villages however concerned that this is not sufficient to meet the needs of those villages and their rural hinterlands.	Increase amount of housing to be accommodated in the Policy Villages 2 settlements.			
223/8	Patricia	Redpath	Kidlington Parish Council	Main	146					The Parish Council accepts that removing the separate target for Kidlington under policy villages 2 allows for a greater degree of flexibility.
233/2	Jonathon	Porter	Barton Wilmore / Archstone Projects Ltd	Main	146		The number of homes to be provided in Category A service villages should be increased. Any figure should also be expressed as a minimum in order to allow flexibility to address delays in delivery elsewhere. The Local Plan needs to make it clear that the overall figure and distribution of homes are approximate and minimum subject to the availability of sites.			The number of dwellings proposed to be delivered in service villages is inadequate. It only represents 7% of the total dwellings required. Category A villages are currently home to 44,197 people which is 31% of Cherwell's population. Many of the villages are quoted as having a wide range of local services and facilities and public transport links. Policy BCS3 will not deliver the dwellings needed. The Plan reinforces the patterns where villages and the rural areas are increasingly the preserve of the relatively wealthy. The Local Plan is contrary to the Planning Practice Guidance (Ref ID 50-001-20140306). Generally remains unbalanced with too much emphasis on strategic housing sites at Banbury and Bicester
235/12	Simon	Gamage	RPS / Mr Bratt	Main	146		The District Council should ensure that in relation to modification 146 allocations are made to meet district-wide housing need.			The District Council should ensure that in relation to modification 146 allocations are made to meet district-wide housing need.

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244/4	Simon	Turner	Launton Parish Council	Main	146	The change in eligibility date for existing developments contributing to meeting housing allocations is unsound. There is a need to consider permissions granted between 2012 and 2014 (e.g 51 houses in Launton) and to take into account the overall increase in housing in villages. The change will inevitably damage the integrity of the villages.	Reinstate the previous cut-off date of 31 March 2012 for recent developments to contribute to meeting housing requirements. Note that a corresponding change should also be made to the date specified in Policy Villages 2.			
252/4	Ian	Gillespie	Carter Jonas / of the Oxford Diocesan Board of Finance	Main	146	Concerned that the effective cap of 750 units in Policy Villages 2 is not supported by appropriate evidence. Category A villages have capacity to accommodate additional sustainable development.	Recommend removing the proposed 750 unit cap (or referring to the 750 homes as a minimum level of provision) which would assist in boosting the supply of new housing, provide greater certainty on delivery and help enhance existing village services and facilities.			
264/10	Andrew	Hornsby-Smith		Main	146	Upper Heyford is in an unsustainable location, and an assessment of Kidlington's housing need is likely to identify need for up to 1700 new homes, therefore a housing target of only 750 homes for category A villages is likely to lead to unsustainable in-commuting to Kidlington, forcing house prices up and precluding young families from remaining in the area, which already has a shortage of affordable housing.	The Category A housing figure should be increased significantly to allow at least part of the unmet housing need to be met locally. It would be preferable for Kidlington to have a separate allocation but it is accepted that this would be premature prior to an actual needs assessment.			
308/2	Andy and Helen	Lumley		Main	146	Object to development around Kidlington.				
138	David	French	Deddington Development Watch	Main	147	Policy Villages 2 relates to sites for not less than 10 dwellings but it does not specify a maximum size for rural developments. A maximum size of 20 dwellings per site would be more appropriate. 'Local' housing need of rural villages is still undefined and is unlikely to warrant major or large-scale development in an individual village. The cumulative effect of a small number of major or large-scale developments in individual villages would risk pre-empting other housing opportunities (on sites of 10 or more dwellings) amongst the Category A villages later in the plan period in response to subsequently identified 'local' housing need between adoption and 2031. Risks the imposition of disproportionately large developments on individual villages. Encourages 'dormitory' developments primarily for the benefit of car dependent workers who live in a particular village and choose to commute to work. Encourages 'dormitory' developments in rural areas which result in an increase of travel and increasing CO2/No emissions. This does not reduce dependency on the private motor car as a mode of travel therefore the Plan should maximise opportunities to encourage public transport.	At the end of the second paragraph, insert the following additional sentence: " <u>Sites should generally not exceed 20 dwellings.</u> "			
034/2	Edward	Dowler	Middle Aston Parish Council	Main	147		"A total of 750 homes will be <u>directed towards</u> Category A Villages <u>and other suitable and sustainable locations within the Rural Area of the District</u> . This will be in addition to the rural allowance for small site 'windfalls' and planning permissions for 10 or more dwellings as at 31 March 2014". <u>"Where a Neighbourhood Plan is not being prepared, when identifying and considering sites, particular regard will be given to the following criteria:</u>			Objection to Mod No. 147 that modifies Policy Villages 2 and addresses the distribution of the additional 750 dwellings to be accommodated in the rural areas. This reference to the homes being "delivered" at Category A Villages is not consistent with National Planning Policy in its rigidity, as this curtails the ability of the Local Plan, through Neighbourhood Plans, to consider wider opportunities for development at sustainable locations, e.g. at the brownfield Former RAF Upper Heyford site as a suitable and entirely appropriate alternative to new greenfield development. Also objection assessment criteria proposed for determining planning applications for housing development in the rural areas. Potential to undermine the ability of Parishes in the identification of sustainable site. Modified Policy Villages 2 requires further refinement to ensure that it does not act as an impediment to the preparation of Neighbourhood Plans, and so that the Local Plan can be responsive to new opportunities for growth identified by the Neighbourhood Planning process

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096/1	John	Coley	Steeple Aston Parish Council	Main	147	The reference to development being 'delivered' in rather than 'directed to' Category A villages, is rigid and inconsistent with National Policy. This curtails the ability of the Local Plan, through Neighbourhood Plans, to consider wider opportunities to develop at sustainable locations, eg through accommodating more housing at the brownfield former RAF Upper Heyford site as an appropriate alternative to greenfield development at Category A villages. New assessment criteria could undermine the development of neighbourhood plans and heavily constrain the ability of parishes to take ownership in identifying sustainable site options.	Policy Villages 2 requires further refinement so that it does not act as an impediment to the preparation of neighbourhood plans and so that the Local Plan can respond to new opportunities for growth identified by the Neighbourhood Planning Process.			Extracts from response: "Mid Cherwell Neighbourhood Planning Forum is working together to consider the appropriate levels of development that may be suitable for Category A villages and may wish to exercise their right to direct a proportion of growth to the brownfield site at the former RAF upper Heyford." "Our comments are intended to demonstrate to the District Council that the Neighbourhood Planning process will provide an appropriate mechanism for providing additional housing in rural areas and that this process should not be unnecessarily constrained by the policies and strategies of the Local Plan."
105/3	Paul	Butt	Paul Butt Planning Ltd / Altitude Real Estate LLP	Main	147	A specific figure of 750 is not justified and it could act as an unhelpful ceiling for Category A villages in helping to meet the objectively assessed housing needs across the Local Plan (Part 1) area arising from the 2014 Strategic Housing Market Assessment, not to assist the vitality of Cherwell's villages (Mod no. 7). The Plan should be deliverable over its period and should at least identify the sites for the further 750 homes within or outside the built-up limits of the Category A villages, including Arncott. It is not enough to say that "The policy is supported by the latest Strategic Housing Land Availability Assessment (SHLAA)". SHLAA Site AN025 at Arncott Motoparc, Murcott Road, Arncott was submitted through the SHLAA Call for Sites in 2014. The site was rejected as it is separate to the village and would impact on the existing entrance to the village which contradicts the modification which provide homes outside the built-up limits of the Category A villages. A Landscape, Townscape and Visual Appraisal is provided to address these issues. The modification is not consistent with national policy.	Modification should be changed to give the Local Plan (Part 1) more flexibility in meeting the objectively assessed housing needs across the Local Plan (Part 1) area and allow for more than the specific ceiling of 750 homes to be provided at the Category A villages, such as at Arncott. The 'allocated' sites should be identified in Policy Villages 2, and this should include the SHLAA site AN025. The identification of these allocated sites are an integral part of the strategy for making provision for the identified objectively assessed housing needs over the plan period and the outcome should not be left to some future date. In the event that the identification of sites for the 750 homes is considered to be 'non strategic' and that sites ought to be identified at some future dates, SHLAA site AN025 ought to be reconsidered for inclusion in the Local Plan Part 2 as an allocated housing site taking into account the accompanying Landscape, Townscape and Visual Assessment. Alternatively to be considered through a Neighbourhood Plan or determination of an application for planning permission on the site.			
137/16	Theresa	Goss	Adderbury Parish Council	Main	147	This suggests that only Category A villages will be required to meet the housing need of 750 dwellings. There is no definition of what Category B will be asked to contribute now that they are considered suitable for minor development.				
144/19	Theresa	Goss	Bloxham Parish Council	Main	147	The reference is for "local housing" this should be viewed in the context of village needs and as such should not warrant large scale development.	The first paragraph should include " <u>that sites should not exceed 20 dwellings.</u> " The 8th criteria in the list could be amended to read: " <u>whether necessary infrastructure could be provided concurrent with the development.</u> " A new criteria could be added to read: " <u>Whether there are other sites in the village being built out or with planning permission and deemed deliverable during the life of the plan.</u> "			
160/3	Jan	Molyneux	Molyneux Planning / Zagora Holdings	Main	147		The plan should provide for the identified housing market requirement within the District and its immediate neighbours and as such should not artificially limited the level of development where appropriate.			The requirement for delivery of homes within the Category A should not be restricted to a total of 750 homes. This should be a minimum provision,. If sites are identified for a greater number of homes then these should be provided for.
160/3	Jan	Molyneux	Molyneux Planning / Zagora Holdings	Main	147	The requirement for delivery of homes within the Category A should not be restricted to a total of 750 homes. This should be a minimum provision. If sites are identified for a greater number of homes then these should be provided for.	The plan should provide for the identified housing market requirement within the District and its immediate neighbours and as such should not artificially limited the level of development where appropriate.			
161/19	Martin	Small	English Heritage	Main	147					English Heritage welcomes the inclusion of "whether significant adverse impact on heritage or wildlife assets could be avoided" as one of the criteria for identifying and considering sites in Category A villages in the Proposed replacement Policy Villages 2.

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203/1	Sheila	Ultsch	Fritwell Parish Council	Main	147	Objection raised that modifies Policy Villages 2 and addresses the distribution of the additional 750 dwellings to be accommodated in the rural areas. The tone of the language is now overly prescriptive. The new assessment criteria has the potential to undermine the work of Neighbourhood Plans and could heavily constrain the ability of Parishes and other participants to take ownership of the identification of sustainable site options to meet housing needs.	Requires further refinement to ensure that it does not act as an impediment to the preparation of Neighbourhood Plans, and so that the Local Plan can be responsive to new opportunities for growth identified by the Neighbourhood Planning process.			The Mid-Cherwell Neighbourhood Planning Forum is proactively working together to consider the appropriate levels of development that may be suitable for the Category A villages, within the Neighbourhood Plan area. Parishes within the Forum could exercise their right to direct a proportion of this growth to the brownfield site at the Former RAF Upper Heyford as a more sustainable location.
207/10	Jacqueline	Mulliner	Terence O'Rourke Ltd / Blenheim Palace Estate	Main	147	Do not consider that the increase in provision to Kidlington is sufficient to achieve sustainable development. A separate allocation of housing requirement should be apportioned specifically to Kidlington/Begbroke to reflect its role as a service centre and location of significant and growing employment opportunities.	Increase housing provision for the rural areas (including Kidlington) to 6,400 dwellings. Require at least 1,000 dwellings to be accommodated at Kidlington, through Green Belt review.			
208/9	Alice	Kirkham	Persimmon Homes and Charles Church Midlands	Main	147	A single housing allocation to the Category A villages, rather than splitting it up into separate groups within the category is welcomed. The increased provision for the rural areas is also welcomed. However this should be increased further. The current allocation of 750 dwellings to the Category A villages would represent a growth of approximately 4.4% to the number of households in this group of settlements in 2011.	It is considered that growth in the region of 10% to this category of settlements over the plan period would be appropriate.			
209/1	John	Stranks	Duns Tew Parish Council	Main	147	Objection raised that modifies Policy Villages 2 and addresses the distribution of the additional 750 dwellings to be accommodated in the rural areas. The tone of the language is now overly prescriptive. A proportion of the additional rural housing could be delivered at the brownfield Former RAF Upper Heyford site. The new assessment criteria has the potential to undermine the work of Neighbourhood Plans and could heavily constrain the ability of Parishes and other participants to take ownership of the identification of sustainable site options to meet housing needs.	Modification to be revised as follows: "A total of 750 homes will be <u>directed towards</u> Category A villages <u>and other suitable and sustainable locations within the Rural Area of the District</u> . This will be in addition to the rural allowance for small site 'windfalls' and planning permissions for 10 or more dwellings as at 31 March 2014. <u>Where a Neighbourhood Plan is not being prepared, when</u> identifying and considering sites, particular regard will be given to the following criteria....."			The Mid-Cherwell Neighbourhood Planning Forum is proactively working together to consider the appropriate levels of development that may be suitable for the Category A villages, within the Neighbourhood Plan area. Parishes within the Forum could exercise their right to direct a proportion of this growth to the brownfield site at the Former RAF Upper Heyford as a more sustainable location.
218/3	Jamie	Lewis	Hunter Page Planning / M&G UK PLP	Main	147	Welcomes the increase in housing for Policy Villages 2 to 750 dwellings at Category A villages however concerned that this is not sufficient to meet the needs of those villages and their rural hinterlands.	Increase amount of housing to be accommodated in the Policy Villages 2 settlements.			
220/1	Ian	Corkin	Ardley with Fewcott Parish Council	Main	147	Objection raised that modifies Policy Villages 2 and addresses the distribution of the additional 750 dwellings to be accommodated in the rural areas. The tone of the language is now overly prescriptive. A proportion of the additional rural housing could be delivered at the brownfield Former RAF Upper Heyford site. The new assessment criteria has the potential to undermine the work of Neighbourhood Plans and could heavily constrain the ability of Parishes and other participants to take ownership of the identification of sustainable site options to meet housing needs.	Modification to be revised as follows: "A total of 750 homes will be <u>directed towards</u> Category A villages <u>and other suitable and sustainable locations within the Rural Area of the District</u> . This will be in addition to the rural allowance for small site 'windfalls' and planning permissions for 10 or more dwellings as at 31 March 2014. <u>Where a Neighbourhood Plan is not being prepared, when</u> identifying and considering sites, particular regard will be given to the following criteria....."			The Mid-Cherwell Neighbourhood Planning Forum is proactively working together to consider the appropriate levels of development that may be suitable for the Category A villages, within the Neighbourhood Plan area. Parishes within the Forum could exercise their right to direct a proportion of this growth to the brownfield site at the Former RAF Upper Heyford as a more sustainable location.
223/6	Patricia	Redpath	Kidlington Parish Council	Main	147					The Parish Council accepts that removing the separate target for Kidlington under policy villages 2 allows for a greater degree of flexibility.
244/5	Simon	Turner	Launton Parish Council	Main	147	Given the level of increased rural housing required by the modified plan, there is now a considerable risk of coalescence between settlements arising from developments (both minor and major) in villages as well as from developments at Bicester and Banbury. Policy Villages 2 is now unsound because it fails to take account of Cherwell DC's stated aims on avoiding coalescence when identifying and considering sites for development in Category A villages.	An additional criterion to be used in identifying and considering sites should be added as follows: - whether development risks coalescence with another settlement			
244/6	Simon	Turner	Launton Parish Council	Main	147	There are errors of typography and/or English in two of the criteria listed.	1. In the third bullet point, "contribute in" would be better as "contribute to"; 2. The fifth bullet point, "whether significant adverse landscape and impacts could be avoided", does not make sense; there is presumably a word missing between "and" and "impacts", but it is not clear what that word should be.			

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247/1	Ruth	Powles	Kirtlington Parish Council	Main	147	Kirtlington is participating in the preparation of the Mid-Cherwell Neighbourhood Plan and has undertaken a parish-wide development survey which should be taken into account in the Local Plan. Kirtlington would offer to take 30 new houses, phased to 2031, a further 12 houses to be allocated to Upper Heyford Park, 10 'windfall' houses at Kirtlington and 9 'windfall' houses to Upper Heyford Park. Significant development on SHLAA site KR010 would be an error. The suggested yield of 75 would be disproportionate.	The Council should provide greater clarity on the criteria for distributing these new homes among the Service / Category A Villages and the Local Plan should provide a "cap" per Service Village, taking into account any relevant Neighbourhood Plan arrangements. The Modifications should ensure that the Local Plan can be responsive to new opportunities for growth identified by the Neighbourhood Planning process.	Support the criteria for identifying and considering sites set out in this modification.		
247/2	Ruth	Powles	Kirtlington Parish Council	Main	147	Object to the proposed change of emphasis in the way the additional 750 dwellings will be distributed in the rural areas. The effect is overly prescriptive. The (Submission) Local Plan stated that development in rural areas will be "directed to" the most sustainable villages. The Plan now states that development will be "delivered at" Category A Villages. This is not consistent with National Planning Policy in its rigidity as it curtails the scope of Neighbourhood Plans.	A proportion of the additional rural housing could be delivered at the brownfield Former RAF Upper Heyford site as a suitable and entirely appropriate alternative to new greenfield development at Category A Villages in the Mid Cherwell Neighbourhood Plan Area.			
252/5	Ian	Gillespie	Carter Jonas / of the Oxford Diocesan Board of Finance	Main	147	The criteria based element of Policy Villages 2 should be retained, allowing the District Council to consider each proposal on its merits. Should include assessment criteria that allow consideration to be given to the Council's housing land supply position (including in relation to delivery rates at Bicester and Banbury) as well as the community benefits that a proposal can deliver.	Include new assessment criteria allowing consideration to be given to the Council's housing land supply position (including in relation to delivery rates at Bicester and Banbury) as well as the community benefits that a proposal can deliver. Policy Villages 2 should be amended to read " <u>At least a further 750 dwellings will be developed in the rural areas</u> ".			
252/6	Ian	Gillespie	Carter Jonas / of the Oxford Diocesan Board of Finance	Main	147	Future consideration should be given to allowing some more development at other villages (Category B and C), where this will deliver suitable development and support the local community.	Consider in the future allowing some more development at category B and C villages			
256/2	Mr & Mrs	Facon		Main	147	Housing provision in the rural parts of the district should be increased, particularly if Oxford's needs have to be accommodated, with greater clarity on the distribution to the most sustainable villages such as Bloxham. The reliance on non-strategic sites to be delivered through the Local Plan Part 2, Neighbourhood Planning and planning applications does not give certainty nor necessarily direct it to the most sustainable locations. How will homes be apportioned? There should be strategic allocations rather than the general figure in Policy Villages 2. It is not clear what the policy distinction is between Policies Villages 1 and Villages 2. Development should be directed to the most sustainable villages (i.e. not the former Category B villages)	Allocating specific housing numbers to each of the individual villages would be the ideal situation as per the previous version of the Plan. The Council should identify those villages that represent the most sustainable locations, using the evidence provided in the SHLAA Refresh, 2014, and by undertaking an updated Village Categorisation Assessment to create a 'Village Hierarchy' which establishes a clear preference for where development in rural areas will take place and then allocate a suitable, increased housing figure in Policy Villages 2 related to the sustainability of the village. Higher rural housing figures are needed. Policy Villages 2 should include minimum housing targets.			
256/3	Mr & Mrs	Facon		Main	147	More evidence is required on the existing service provision in the proposed Category A villages, in order that the policy can be seen as effective, justified and be considered 'sound'. The current update to the Village Categorisation Assessment fails to do this.	Bloxham, should also be elevated to the higher classification in this (perhaps Category A+) in recognition of its level of existing service provision, and the amount of development that is likely be delivered over and above some of the smaller Category A villages, which have much less local services and facilities.			
256/5	Mr & Mrs	Facon		Main	147	SHLAA site BL022 (Courtington Lane, Bloxham) has been unfairly discounted. The site is suitable for 70-100 homes and is more sustainable than other sites identified. The Council has not undertaken a proper assessment of land availability.	A full and proper assessment of sites			

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259/2	Paul	Burrell	Pegasus Group / The Dorchester Group	Main	147	The modified text and its reference to homes being "delivered" at category A villages is not consistent with national policy. The criteria based approach to identifying sites for development is objected to as it gives insufficient consideration to the role of Neighbourhood Plans in terms of delivery of non-strategic sites. The criteria could be considered unnecessary and counter-intuitive to the local decision making process.	Policy Villages 2 needs further amendment to ensure it does not constrain the preparation of Neighbourhood Plans or the ability of the Local Plan to respond positively to wider opportunities for growth. Greater emphasis should be incorporated in the policy to ensure the primacy of the Neighbourhood Planning process in identifying suitable and sustainable locations for future non-strategic sites, including those locations outside of Category A villages. The following changes are advocated to the policy: "A total of 750 homes will be directed towards Category A villages and other suitable and sustainable locations within the Rural Area of the District . This will be in addition to the rural allowance for small site "windfalls" and planning permissions for 10 or more dwellings as at 31 March 2014. Where a Neighbourhood Plan is not being prepared, when identifying and considering sites, particular regard will be paid....."			
260/2	Jason	Hill	Savills / J W Tustian Estate	Main	147					Site- Land adjacent to Oak Farm, Milcombe: On behalf of our client, we wish to support the soundness of the classification of Milcombe as Category A village (service centre). We consider that the village is a highly sustainable location for development. We confirm that our client's landholding, Land adjacent to Oak Farm (SHLAA 2014 Ref. MI018) is available and capable of delivering a sustainable development in accordance with the criteria laid out in Modification 147 and in the SHLAA 2014 assessment of the site.
261/2	Jason	Hill	Savills / J W Tustian Estate	Main	147					Site- Land at Grange Farm, Launton: On behalf of our client, we wish to support the soundness of the classification of Launton as Category A village (service centre) and the proposed distribution of housing across the rural areas. We consider that the village is a highly sustainable location for development. We confirm that our client's landholding, Land at Grange Farm (SHLAA 2014 Ref. LA012) is available and capable of delivering a sustainable development in accordance with the criteria laid out in Modification 147. We consider that the evidence on which this site was rejected under the SHLAA 2014 was unsound.
262/3	Jason	Hill	Savills	Main	147					Site- Stratfield Farm Kidlington: The representor supports the soundness of the modifications relating to the distribution of housing across the rural villages and potential Green Belt review in Kidlington. They indicate that their client's land is available and capable of delivering a sustainable development in accordance with the criteria laid out in Modification 147 and in the SHLAA assessment of the site.
264/11	Andrew	Hornsby-Smith		Main	147	Upper Heyford is in an unsustainable location, and an assessment of Kidlington's housing need is likely to identify need for up to 1700 new homes, therefore a housing target of only 750 homes for category A villages is likely to lead to unsustainable in-commuting to Kidlington, forcing house prices up and precluding young families from remaining in the area, which already has a shortage of affordable housing.	The Category A housing figure should be increased significantly to allow at least part of the unmet housing need to be met locally. It would be preferable for Kidlington to have a separate allocation but it is accepted that this would be premature prior to an actual needs assessment.			

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268/6	Darren	Bell	David Lock Associates / Hallam Land Management	Main	147	Policy Villages 2 does not wholly comply with the NPPF which seeks to locate development in sustainable locations. The policy now disperses the new total allocation of 750 dwellings over all 24 defined Category A villages, which would limit housing in more sustainable locations and disperse housing where there are limited services and infrastructure. The explanation is to "broaden the scope of villages to meet objectively assessed housing needs", however these can be met whilst maintaining a more sustainable distribution of development: The SHLAA indicates potential for 387 dwellings in Kidlington and 549 across the 5 most sustainable villages, in excess of the allocation of 750 dwellings.	Revise Policy Villages 2 to re-introduce a priority for development at the most sustainable villages in accordance with the NPPF, Draft Policy BSC1 and evidence in CDC's Housing Topic Paper, as follows: a) apportioning the majority of the 750 dwellings to Kidlington and the six villages previously identified as being the most sustainable, with 80 dwellings at Kidlington, at least 500 to the most sustainable villages and the rest to the remaining less sustainable villages, b) introduce additional text to clarify that in considering proposals for over 10 dwellings, the scale of the proposal should be consistent with the size of the village and the availability of services and infrastructure, and c) introduce clear cross referencing between Policy Villages 2 and 1 to clarify it is not just minor development that is acceptable in Category A villages.			
272/3	Kevin	Ayrton	Carter Jonas / Pain family	Main	147		Remove the reference to 750 dwellings in Policy Villages 2 to boost housing supply, provide greater certainty that objectively assessed housing needs will be met, and at a local level help support and enhance existing village services and facilities. Include new assessment criteria to allow consideration to be given to the housing land supply position as well as the community benefits a proposal can be delivered. As a minimum, the start of Policy Villages 2 should be amended to read "At least a further 750 dwellings will be developed in the rural areas.."			
296/2	Kildare	Bourke-Borrowes	North Aston Parish Meeting	Main	147	The modification is over prescriptive and inconsistent with national policy in its rigidity. Objection is made to the term "delivered" and the proposed assessment criteria as they could undermine the work of Neighbourhood Plans and constrain the ability of parishes to identify sustainable site options. Mid Cherwell Neighbourhood Planning Forum is considering appropriate levels of development for Category A villages in its area and may wish to direct a proportion of this growth to Former RAF Upper Heyford as a more sustainable location.	Modification 147 should be revised as follows: "A total of 750 homes will be <u>directed towards</u> Category A villages <u>and other suitable and sustainable locations within the Rural Area of the District</u> . This will be in addition to the rural allowance for small site "windfalls" and planning permissions for 10 or more dwellings as at 31 March 2014." <u>"Where a Neighbourhood Plan is not being prepared, when</u> identifying and considering sites, particular regard will be given to the following criteria: whether the land has been previously developed land or is of lesser environmental value;....."			
312/1	Peter	Frampton	Framptons / Mr R Stilgoe	Main	147			The Rosconn Group and Mr R. Stilgoe support increased provision for development in Category A villages, including Adderbury. Adderbury contains a number of facilities and justly deserves the Category A status as a sustainable settlement.		Site - Land at Milton Road. It is acknowledged that planning permission has been granted for new housing development at Adderbury. The granting of these consents has not reached any form of environmental, technical or social capacity of Adderbury to accommodate further housing development within the Plan period. It is submitted that the site edged red may accommodate circa 45 dwellings, while satisfactorily responding to Policy Villages 2 criteria. Proposals for new homes on this site will be presented to the LPA through the preparation of a planning application in due course. (map attached).
179/53	Matthew	Bates	Oxford City Council	Main	147	Given Policy Villages 2 covers a wide area of Cherwell, the test of identifying 'broad locations' appears not to have been met. This provides little certainty to residents and stakeholders in terms of where in future this housing growth will be directed to. There is also inadequate evidence that sites to support this level of growth can be delivered. Even if sites identified in the SHLAA can be relied on ahead of the Local Plan Part 2, there is little evidence that sustainability of (as yet undefined) locations, including infrastructure requirements, has been considered	Early Plan review to allow proper consideration. Accept the need for a review of the Oxford Green Belt north of Oxford in the short term, rather than to increase rural housing supply. There should be cross-reference to new Policy PSD2 and a revised BCS1 and supporting text to include much stronger reference to the need for an early Plan review. This is likely to include a strategic Green Belt review, as contingency to ensure delivery of both Cherwell's own Objectively Assessed Housing Need, and further address the unmet needs of the Housing Market Area.			

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167/08	Colin	Cockshaw	Bicester Against Eco-Con (BAECon)	Main	148	We consider the increased provision at Upper Heyford to be appropriate. We recognise that there are constraints which will limit the extent to which the former air base can be developed, but despite its rural location, it is well located to both motorway connections and railway stations and also well-located in relation to Bicester and other urban centres further afield. Moreover it is largely previously developed land. We support the development of this site to its maximum potential – if possible providing more housing than that proposed in the plan modification.	This is a particularly ill-judged proposal for use of greenfield land in a very open and sensitive location, beyond the limits of the urban area, adjoining the airfield Conservation Area. It is acknowledged that development (an old people's home) is already taking place here (another ill-judged decision by the Council) but this is no justification for this large scale intrusion of development for employment purposes in this particular situation. The site is not physically or visually related to existing employment areas or to the residential area to the south. It does relate visually to the airfield and so helps to protect and enhance the character of the Conservation Area. It should be retained for this reason and because of its open aspect and excellent well-used access via rights of way into the surrounding countryside.			
161/20	Martin	Small	English Heritage	Main	148					English Heritage welcomes and supports the proposed new paragraph following C.252 explaining the historical significance of the Former RAF Upper Heyford.
166/39	Helen	Marshall	CPRE Oxfordshire	Main	148	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The proposed modifications should therefore be withdrawn, returning to the policy included in the original submission document (31 Jan 2014). Failing this, at the very least the greenfield area to the north of Camp Road, east of Larsen Road, should be removed from the allocation as a site of particular sensitivity.			The present suggestion to allocate 1,600 dwellings (in addition to the 761 dwellings (net) already permitted) would represent over-development that would be unsound and unsustainable due to the impact on a historic site and the lack of appropriate transport links. In particular, the greenfield area to the north of Camp Road, east of Larsen Road, is inappropriate for development. Cherwell District Council itself has consistently argued that the site is only appropriate for a maximum of 1,000 houses and has turned down earlier applications.
202/2	Jane	Hennell	The Canal & River Trust	Main	148			Welcomes the recognition of the need to protect the Oxford Canal.		
259/4	Paul	Burrell	Pegasus Group / The Dorchester Group	Main	148		Amend paragraphs C.251- C.252 as follows: "C.251 The former RAF Upper Heyford site is located 7 km north west of Bicester, in an isolated rural location, within the parishes of Upper Heyford, Somerton and Ardley. It measures approximately 500 hectares in total. C.252 The US Air Force vacated the airbase in 1994 and since 1996 this unique site has been identified allocated for residential led mixed uses as enabling development to which will secure environmental improvements and conservation of the heritage interest of the site associated with its former use as a Cold War military base. The airbase is located at the top of a plateau and is set within otherwise open countryside. Land to the west falls sharply to the Cherwell valley and Oxford Canal (the Canal itself has been designated as a Conservation Area). The Grade I listed Rousham Park is located in the valley to the south west of the site. The Rousham, Lower Heyford and Upper Heyford Conservation Area abuts adjoins the airbase site, whilst the airbase itself has been designated as a Conservation Area in view of the national importance of parts of the site and in terms of the significant heritage interest.			
179/54	Matthew	Bates	Oxford City Council	Main	148	The location of the Upper Heyford site is far less sustainable than the reasonable alternative of an urban extension to Oxford. Objects that the housing allocation has been increased by some 210%. There is no detail of any empirical analysis of the likely transport and traffic impacts available. This option for growth has not been properly assessed against the reasonable alternatives	Should be a cross-reference to new Policy PSD2, a revised BCS1 and supporting text to include much stronger reference to the need for an early Plan review. This is likely to include a strategic Green Belt review, as contingency to ensure delivery of both Cherwell's own Objectively Assessed Housing Need, and further address the unmet needs of the Housing Market Area			

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037/1	Daniel	Scharf	Oxford Trust for Contemporary History	Main	149	contravenes European conventions				Failure by the Council to engage with OTCH in the preparation of the Plan and the modifications. Failure to apply European Conventions on the protection of architectural and archaeological heritage Paragraph 149 should specify the international importance of the site and not just the national.
161/21	Martin	Small	English Heritage	Main	149					English Heritage welcomes and supports the proposed updated text for paragraph C.253.
166/40	Helen	Marshall	CPRE Oxfordshire	Main	149	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The proposed modifications should therefore be withdrawn, returning to the policy included in the original submission document (31 Jan 2014). Failing this, at the very least the greenfield area to the north of Camp Road, east of Larsen Road, should be removed from the allocation as a site of particular sensitivity.			The present suggestion to allocate 1,600 dwellings (in addition to the 761 dwellings (net) already permitted) would represent over-development that would be unsound and unsustainable due to the impact on a historic site and the lack of appropriate transport links. In particular, the greenfield area to the north of Camp Road, east of Larsen Road, is inappropriate for development. Cherwell District Council itself has consistently argued that the site is only appropriate for a maximum of 1,000 houses and has turned down earlier applications.
259/5	Paul	Burrell	Pegasus Group / The Dorchester Group	Main	149		The paragraph should be re-worded as follows: "C.253 in view of this heritage interest, the whole site has been designated as a Conservation Area. There are a number of Scheduled Ancient Monuments, listed buildings, and non designated heritage assets of national importance on site, as well as other unlisted buildings that make a positive contribution to the character or appearance of the conservation area, <u>with some areas within the site and much of the airfield</u> is of ecological importance including a Local Wildlife Site. (recently extended in area). The site has been divided into three main functional character areas: the main flying field and a technical site to the north of Camp Road and the residential area that is mainly to the south of Camp Road. which itself consists of five distinctive character areas reflecting different functions and historic periods of construction. The flying field represents the core area of historic significance, and is of national significance due to its cold war associations."			
179/55	Matthew	Bates	Oxford City Council	Main	149	The location of the Upper Heyford site is far less sustainable than the reasonable alternative of an urban extension to Oxford. Objects that the housing allocation has been increased by some 210%. There is no detail of any empirical analysis of the likely transport and traffic impacts available. This option for growth has not been properly assessed against the reasonable alternatives	Should be a cross-reference to new Policy PSD2, a revised BCS1 and supporting text to include much stronger reference to the need for an early Plan review. This is likely to include a strategic Green Belt review, as contingency to ensure delivery of both Cherwell's own Objectively Assessed Housing Need, and further address the unmet needs of the Housing Market Area			
157/2	Richard	Preston	Steeple Aston Parish Council	Main	150			Confirms that Policy Villages 5 replaces saved Structure Plan policy H2 which an inflicted an artificial policy cap		
166/41	Helen	Marshall	CPRE Oxfordshire	Main	150	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The proposed modifications should therefore be withdrawn, returning to the policy included in the original submission document (31 Jan 2014). Failing this, at the very least the greenfield area to the north of Camp Road, east of Larsen Road, should be removed from the allocation as a site of particular sensitivity.			The present suggestion to allocate 1,600 dwellings (in addition to the 761 dwellings (net) already permitted) would represent over-development that would be unsound and unsustainable due to the impact on a historic site and the lack of appropriate transport links. In particular, the greenfield area to the north of Camp Road, east of Larsen Road, is inappropriate for development. Cherwell District Council itself has consistently argued that the site is only appropriate for a maximum of 1,000 houses and has turned down earlier applications.

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259/6	Paul	Burrell	Pegasus Group / The Dorchester Group	Main	150		C.254 should be amended as follows: "C.254 The site was previously is subject to a policy from the Oxfordshire Structure Plan 2016 (Policy H2) which was saved by the South East Plan and retained upon the South East Plan's revocation. Policy Villages 5 below replaces Policy H2 in guiding the future redevelopment of the site <u>and is intended to provide a positive policy framework within which opportunities to accommodate development are considered having regard to known constraints, principally heritage, ecology and transport impacts associated with additional development.</u> A Revised-Comprehensive Planning Brief to guide the future-redevelopment of the site was adopted by the Council as an SPD in 2007-.			Proposed modification 150 is welcomed and supported as it confirms that Policy Villages 5 replaces Saved Structure Plan Policy H2, and thus removes the unwarranted policy cap. This enables the council to consider the appropriateness of additional development at Upper Heyford so as to create a new and sustainable community commensurate with sustainability principles.
259/6	Paul	Burrell	Pegasus Group / The Dorchester Group	Main	150		Revised wording for para C.254 cont.: " <u>The current Conservation Area designation was prepared within the context of the policy on constraints imposed by Policy H2 of the Oxfordshire Structure Plan, principally upon transport limitations which were thought to preclude development of more than 1,000 additional homes. The latest transport assessments show that at least a further 2,000 homes are capable of being accommodated on the site. It is therefore necessary to review the existing Conservation Area designation as part of the wider review of development opportunities at this brownfield site. Such a review will require joint working between the site owner, English Heritage and the District Council's Conservation Team. Such a process will ensure that a lasting solution, based on a complete and up to date understanding of the opportunities, taking into account this updated transport assessment, is in place for this site.</u> "			
296/3	Kildare	Bourke-Borrowes	North Aston Parish Meeting	Main	150			Modification 150 is supported as it will replace Saved Structure Plan Policy H2, which inflicted an artificial cap at Heyford Park. This will aid the Local Plan and Neighbourhood Plan in considering the appropriateness of additional development at Upper Heyford.		
179/56	Matthew	Bates	Oxford City Council	Main	150	The location of the Upper Heyford site is far less sustainable than the reasonable alternative of an urban extension to Oxford. Objects that the housing allocation has been increased by some 210%. There is no detail of any empirical analysis of the likely transport and traffic impacts available. This option for growth has not been properly assessed against the reasonable alternatives.	Should be a cross-reference to new Policy PSD2, a revised BCS1 and supporting text to include much stronger reference to the need for an early Plan review. This is likely to include a strategic Green Belt review, as contingency to ensure delivery of both Cherwell's own Objectively Assessed Housing Need, and further address the unmet needs of the Housing Market Area.			
166/42	Helen	Marshall	CPRE Oxfordshire	Main	151	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The proposed modifications should therefore be withdrawn, returning to the policy included in the original submission document (31 Jan 2014). Failing this, at the very least the greenfield area to the north of Camp Road, east of Larsen Road, should be removed from the allocation as a site of particular sensitivity.			The present suggestion to allocate 1,600 dwellings (in addition to the 761 dwellings (net) already permitted) would represent over-development that would be unsound and unsustainable due to the impact on a historic site and the lack of appropriate transport links. In particular, the greenfield area to the north of Camp Road, east of Larsen Road, is inappropriate for development. Cherwell District Council itself has consistently argued that the site is only appropriate for a maximum of 1,000 houses and has turned down earlier applications.

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259/7	Paul	Burrell	Pegasus Group / The Dorchester Group	Main	151		Re-word para C.255 as follows: "C.255 Since the airbase closed in 1994 temporary planning permissions have been have been granted for the reuse of a large number of the buildings on the site. At present there are approximately just over 32000 residential dwellings on the site, the majority of which are rented. Buildings used for employment purposes provide around 1,300 jobs. <u>The well-established employment base supports the classification within the Plan as the only Strategic Employment site outside the main towns of Banbury and Bicester and is currently over 90% occupied.</u> The Cherwell Innovation Centre is also located on the site, providing serviced offices and flexible office space, lab space, and meeting rooms. The Centre is home to a large number of science, technology and knowledge-based businesses. Paragon Fleet Solutions operate on a large part of the site former airbase , undertaking <u>vehicle engineering with associated</u> office, technical and transport related activities, centred around "car processing" (cont.)			
259/7	Paul	Burrell	Pegasus Group / The Dorchester Group	Main	151		Revised para C.255 cont.: " <u>Many of the businesses currently located at the site have expressed a desire for additional space to support economic development and additional employment provision at Upper Heyford will reinforce the strategic employment function of the site and respond to opportunities to deliver a thriving and diverse economic base on which the Local Plan can meet its Economic objectives, principally SO1, by facilitating economic growth and employment with an emphasis on attracting higher technology industries and SO2, to support the diversification of Cherwell's rural employment base.</u> "			
179/57	Matthew	Bates	Oxford City Council	Main	151	The location of the Upper Heyford site is far less sustainable than the reasonable alternative of an urban extension to Oxford. Objects that the housing allocation has been increased by some 210%. There is no detail of any empirical analysis of the likely transport and traffic impacts available. This option for growth has not been properly assessed against the reasonable alternatives	Should be a cross-reference to new Policy PSD2, a revised BCS1 and supporting text to include much stronger reference to the need for an early Plan review. This is likely to include a strategic Green Belt review, as contingency to ensure delivery of both Cherwell's own Objectively Assessed Housing Need, and further address the unmet needs of the Housing Market Area			
157/3	Richard	Preston	Steeple Aston Parish Council	Main	152	The conclusions set out in Proposed Mod. 152 seem constraint driven.	There should be a positive agenda to facilitate redevelopment of this large brownfield site as set out in the NPPF.			
161/22	Martin	Small	English Heritage	Main	152					English Heritage welcomes the proposed updated text for paragraph C.256.
166/43	Helen	Marshall	CPRE Oxfordshire	Main	152	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The proposed modifications should therefore be withdrawn, returning to the policy included in the original submission document (31 Jan 2014). Failing this, at the very least the greenfield area to the north of Camp Road, east of Larsen Road, should be removed from the allocation as a site of particular sensitivity.			The present suggestion to allocate 1,600 dwellings (in addition to the 761 dwellings (net) already permitted) would represent over-development that would be unsound and unsustainable due to the impact on a historic site and the lack of appropriate transport links. In particular, the greenfield area to the north of Camp Road, east of Larsen Road, is inappropriate for development. Cherwell District Council itself has consistently argued that the site is only appropriate for a maximum of 1,000 houses and has turned down earlier applications.

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259/8	Paul	Burrell	Pegasus Group / The Dorchester Group	Main	152	Objection is made to the conclusions set out in the text as these do not reflect that previous proposals subject to planning applications and appeals at former RAF Upper Heyford were considered within the constraints of Saved Structure Plan Policy H2, which will be replaced on adoption of the Local Plan. The Plan's constraint driven approach to the site is inconsistent with national policy.	Paragraph C.256 be re-worded as follows: "C.256 <u>The site has an extensive planning history and has planning permission for a new settlement of 1,075 dwellings (gross), together with associated works and facilities including employment uses, a Free School, and other physical and social infrastructure. A resolution to grant for a further 60 homes on the site has also been agreed by the District Council. The complex history of the site reflects the opportunities that are provided by this large scale brownfield site within the constraints to development in terms of heritage, ecology and associated transport impacts. As such development proposals at the Former RAF Upper Heyford Site will need to be subject to detailed and thorough assessment, such considerations should include:</u> Over the last 10 years numerous applications have been made seeking permission to either develop the whole site or large parts of it and a number many have gone to appeal. The most significant application proposed a new settlement of 1,075 dwellings (gross), together with associated works and facilities including employment uses, community uses, school, playing fields and other physical and social infrastructure for the entire site. Following a major public inquiry in 2008 the Council received the appeal decision from the Secretary of State in January 2010 demonstrating the significant environmental and heritage constraints and the complexities of the site."			
259/8	Paul	Burrell	Pegasus Group / The Dorchester Group	Main	152		Cont.....Revised wording para C.256 cont.: "A number of matters raised in the 2008 public inquiry is set out in the appeal decision from the Secretary of State in January 2010 remain relevant to the consideration of the scale, location and type of development that can take place at Upper Heyford including the delivery of the required balance of historical/cultural objectives, environmental improvements, ecological benefits and public access; <input checked="" type="checkbox"/> whether the scale, type and location of <u>additional employment and housing and storage proposed for can be accommodated without significant adverse impacts on the the Flying Field would harm the character of the an updated Conservation Plan Area</u> and setting of Listed Buildings; <input checked="" type="checkbox"/> the extent of demolition/reuse of historic buildings on the site <u>and the delivery of new buildings outside of nationally important heritage areas provided to meet existing and future demand;....</u>			
259/8	Paul	Burrell	Pegasus Group / The Dorchester Group	Main	152		Cont..... <input checked="" type="checkbox"/> whether adequate opportunities for travel other than by private car w could be delivered; <input checked="" type="checkbox"/> whether adequate infrastructure could be delivered; and <input checked="" type="checkbox"/> whether a comprehensive and lasting approach to the whole site could be delivered, <u>including any further development, subject to transport assessments, outside of the Plan period.-</u>			
296/4	Kildare	Bourke-Borrowes	North Aston Parish Meeting	Main	152	The conclusions are constraint driven. There should be a positive approach to redevelopment of this brownfield site as set out in the NPPF paragraph 17.	There should be a positive agenda for the redevelopment of this large brownfield site.			
179/58	Matthew	Bates	Oxford City Council	Main	152	The location of the Upper Heyford site is far less sustainable than the reasonable alternative of an urban extension to Oxford. Objects that the housing allocation has been increased by some 210%. There is no detail of any empirical analysis of the likely transport and traffic impacts available. This option for growth has not been properly assessed against the reasonable alternatives	Should be a cross-reference to new Policy PSD2, a revised BCS1 and supporting text to include much stronger reference to the need for an early Plan review. This is likely to include a strategic Green Belt review, as contingency to ensure delivery of both Cherwell's own Objectively Assessed Housing Need, and further address the unmet needs of the Housing Market Area			

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166/44	Helen	Marshall	CPRE Oxfordshire	Main	153	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The proposed modifications should therefore be withdrawn, returning to the policy included in the original submission document (31 Jan 2014). Failing this, at the very least the greenfield area to the north of Camp Road, east of Larsen Road, should be removed from the allocation as a site of particular sensitivity.			The present suggestion to allocate 1,600 dwellings (in addition to the 761 dwellings (net) already permitted) would represent over-development that would be unsound and unsustainable due to the impact on a historic site and the lack of appropriate transport links. In particular, the greenfield area to the north of Camp Road, east of Larsen Road, is inappropriate for development. Cherwell District Council itself has consistently argued that the site is only appropriate for a maximum of 1,000 houses and has turned down earlier applications.
179/59	Matthew	Bates	Oxford City Council	Main	153	The location of the Upper Heyford site is far less sustainable than the reasonable alternative of an urban extension to Oxford. Objects that the housing allocation has been increased by some 210%. There is no detail of any empirical analysis of the likely transport and traffic impacts available. This option for growth has not been properly assessed against the reasonable alternatives	Should be a cross-reference to new Policy PSD2, a revised BCS1 and supporting text to include much stronger reference to the need for an early Plan review. This is likely to include a strategic Green Belt review, as contingency to ensure delivery of both Cherwell's own Objectively Assessed Housing Need, and further address the unmet needs of the Housing Market Area			
037/2	Daniel	Scharf	Oxford Trust for Contemporary History	Main	154					Paragraph should explain that that the development is being supported exceptionally in an unsustainable location
157/4	Richard	Preston	Steeple Aston Parish Council	Main	154	The allocation of additional greenfield land at Former RAF Upper Heyford fails to fully prioritise the opportunities available on the brownfield land.	Further growth at Heyford should be accompanied by a full and proper review of the opportunities and constraints applicable on the brownfield areas in accordance with the NPPF.			
158/3	Simon	Greenwood	Savills / New College	Main	154	New College as owner of land within and adjoining the proposed welcomes the proposals to identify Former RAF Upper Heyford as a strategic site for a new settlement in the rural areas. The Upper Heyford Assessment Interim Final Report and The Landscape Sensitivity and Capacity Assessment are welcomed. The wording as presently drafted provides appropriate emphasis on the potential of the southern part of the former airbase and adjoining land south of camp road to provide development but fails to consider the proper opportunity for the development of a major new settlement which can be provided because it does not reflect the full potential of the new sustainable.	The policies should consider the overall potential to provide a new community at former RAF Upper Heyford supporting the local villages even if its delivery extends beyond the Local Plan period so that it can be planned from inception to provide the appropriate infrastructure.		Comments reflected in the opportunity to create a new settlement at Former RAF Upper Heyford which will provide a comprehensive community if planned as a whole even if part of the proposals would be developed after the plan period.	
161/23	Martin	Small	English Heritage	Main	154					English Heritage welcomes the references in the proposed new paragraph C.258 to the most historically significant and sensitive parts of the Former RAF Upper Heyford, its significant heritage interest and the mitigation of heritage impacts.
166/45	Helen	Marshall	CPRE Oxfordshire	Main	154	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The proposed modifications should therefore be withdrawn, returning to the policy included in the original submission document (31 Jan 2014). Failing this, at the very least the greenfield area to the north of Camp Road, east of Larsen Road, should be removed from the allocation as a site of particular sensitivity.			The present suggestion to allocate 1,600 dwellings (in addition to the 761 dwellings (net) already permitted) would represent over-development that would be unsound and unsustainable due to the impact on a historic site and the lack of appropriate transport links. In particular, the greenfield area to the north of Camp Road, east of Larsen Road, is inappropriate for development. Cherwell District Council itself has consistently argued that the site is only appropriate for a maximum of 1,000 houses and has turned down earlier applications.
247/3	Ruth	Powles	Kirtlington Parish Council	Main	154	Objects to this Modification because there should be preferential and maximum use of brownfield sites rather than greenfield, avoiding only the most historically significant and sensitive parts of the site, after rigorous appraisal.	There should be preferential and maximum use of brownfield sites rather than greenfield, avoiding only the most historically significant and sensitive parts of the site, after rigorous appraisal <i>(CDC officer clarification - it is assumed that this refers to Former RAF Upper Heyford)</i>			

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259/9	Paul	Burrell	Pegasus Group / The Dorchester Group	Main	154	Greenfield land has been incorporated to accommodate increased housing provision at Former RAF Upper Heyford as the opportunities for development on brownfield land has not been fully considered, contrary to the NPPF paragraph 17, and advice in the NPPG. No objection is raised to the scale of additional housing proposed based on evidence currently available, but objection is raised to the strategy and preferred locations.	Re-word para C.258 as follows: "C.258 This site is therefore allocated in this Local Plan as a means of securing the delivery of a lasting arrangement on this exceptional large scale brownfield site, which reflects the exceptional nature of the site, whilst <u>A. Additional development is proposed</u> greenfield land is now allocated in the context of meeting the full objectively assessed housing needs of the district by realising the opportunities presented by the development of this new settlement. <u>A comprehensive review of the capacity of the Former RAF Upper Heyford site will consider the opportunities to deliver significant additional housing and employment development on brownfield land, consistent with the emphasis in national policy. While greenfield land may also be appropriate, development on greenfield land should not preclude or undermine the strategy to encourage the effective use of land by reusing land that has been previously developed. To this end development provided by Village Policy 5 is based on a brownfield first approach with suitable and appropriate development areas sequentially preferable before the release of greenfield land. The approach is set out in ascending numerical order on the Sequential Delivery Plan attached and is based on the following the sequential delivery of additional development as follows:"</u> (cont.)			
259/9	Paul	Burrell	Pegasus Group / The Dorchester Group	Main	154		Cont....Revised wording para C.258 cont.: " <u>A. Additional brownfield land as identified through the Proposed Modifications (location area Nos. 1-3)</u> <u>B. Additional development through intensification of existing permitted development areas (locations within area No. 4)</u> <u>C. Additional development as a result of a strategic review of development opportunities across the wider brownfield site (Locations within area No. 5)</u> <u>D. Additional development from greenfield sites (location area Nos. 6-8).</u> The former airbase site currently has planning permission for a new settlement of some 1075 homes (gross) <u>and a resolution to grant for a further 60 homes</u> , and Policy Villages 5 provides <u>a positive policy framework within which brownfield land will provide an important resource for the delivery of additional development through a combination of:</u> <u>i. Further development upon the previously developed parts of the former airbase, and</u> <u>ii. New greenfield development around the main airbase site in locations which may be permitted in circumstances where such development will be complementary to the brownfield first approach to housing delivery at this location. (As shown on inset map Policy Villages 5).</u> (cont.)			
259/9	Paul	Burrell	Pegasus Group / The Dorchester Group	Main	154		Cont.....revised wording para C.258 cont.: " for additional development through a combination of the intensification of the density of development proposed on the less sensitive previously developed parts of the site, and new, limited, greenfield development around the main airbase site in locations be complementary to the approved development. The additional development areas are shown on inset map Policy Villages 5. The policy allows for residential development focused to the south of the flying field, avoiding the most historically significant and sensitive parts of the site, <u>with scope for and on</u> limited greenfield land <u>development, to the south of Camp Road (and one greenfield area to the north of Camp Road, east of Larsen Road).</u> Given the rural and isolated location of the settlement, and its significant heritage interest, securing adequate transport arrangements and funding the necessary mitigation of transport and heritage impacts will be of particular importance, whilst Policy Villages 5 also makes provisions relating to the importance of high quality design to reflect the distinctive character areas of the site.			

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296/5	Kildare	Bourke-Borrowes	North Aston Parish Meeting	Main	154	The modification suggests additional greenfield land is allocated at Upper Heyford. Objection is made to this preferred strategy because it fails to prioritise the inherent opportunities available on the adjacent brownfield land.	Further growth at Upper Heyford should be accompanied by a full and proper review of the opportunities and constraints applicable on the brownfield areas, consistent with NPPF paragraph 17 which "encourages the effective use of land by reusing land that has been previously developed (brownfield land), providing it is not of high environmental value." Brownfield opportunities should be thoroughly examined before greenfield land is released for new development.			
179/60	Matthew	Bates	Oxford City Council	Main	154	The location of the Upper Heyford site is far less sustainable than the reasonable alternative of an urban extension to Oxford. Objects that the housing allocation has been increased by some 210%. There is no detail of any empirical analysis of the likely transport and traffic impacts available. This option for growth has not been properly assessed against the reasonable alternatives	Should be a cross-reference to new Policy PSD2, a revised BCS1 and supporting text to include much stronger reference to the need for an early Plan review. This is likely to include a strategic Green Belt review, as contingency to ensure delivery of both Cherwell's own Objectively Assessed Housing Need, and further address the unmet needs of the Housing Market Area			
166/46	Helen	Marshall	CPRE Oxfordshire	Main	155	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The proposed modifications should therefore be withdrawn, returning to the policy included in the original submission document (31 Jan 2014). Failing this, at the very least the greenfield area to the north of Camp Road, east of Larsen Road, should be removed from the allocation as a site of particular sensitivity.			The present suggestion to allocate 1,600 dwellings (in addition to the 761 dwellings (net) already permitted) would represent over-development that would be unsound and unsustainable due to the impact on a historic site and the lack of appropriate transport links. In particular, the greenfield area to the north of Camp Road, east of Larsen Road, is inappropriate for development. Cherwell District Council itself has consistently argued that the site is only appropriate for a maximum of 1,000 houses and has turned down earlier applications.
247/4	Ruth	Powles	Kirtlington Parish Council	Main	155			Qualified support to Modification 155 on the basis of maximum use of brownfield sites		
259/10	Paul	Burrell	Pegasus Group / The Dorchester Group	Main	155		revise paragraph C.259 as follows: "C.259 A comprehensive approach will be required and it will be necessary to demonstrate how the additional land identified can be satisfactorily accommodated in addition to that already permitted through extant planning consents, integrated with the approved development. Any The additional green field land will not be permitted to be developed independently of the main development or until brownfield land has been identified and utilised (except for green infrastructure or other infrastructure needs) and infrastructure contributions will be expected for the wider scheme."			
179/61	Matthew	Bates	Oxford City Council	Main	155	The location of the Upper Heyford site is far less sustainable than the reasonable alternative of an urban extension to Oxford. Objects that the housing allocation has been increased by some 210%. There is no detail of any empirical analysis of the likely transport and traffic impacts available. This option for growth has not been properly assessed against the reasonable alternatives	Should be a cross-reference to new Policy PSD2, a revised BCS1 and supporting text to include much stronger reference to the need for an early Plan review. This is likely to include a strategic Green Belt review, as contingency to ensure delivery of both Cherwell's own Objectively Assessed Housing Need, and further address the unmet needs of the Housing Market Area			
037/3	Daniel	Scharf	Oxford Trust for Contemporary History	Main	156					Delete reference to the 2005 Conservation Plan and the 2007 Planning Brief which have been superseded by the 2014 interim report
161/24	Martin	Small	English Heritage	Main	156					English Heritage welcomes and supports proposed paragraph C.259.

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166/47	Helen	Marshall	CPRE Oxfordshire	Main	156	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The proposed modifications should therefore be withdrawn, returning to the policy included in the original submission document (31 Jan 2014). Failing this, at the very least the greenfield area to the north of Camp Road, east of Larsen Road, should be removed from the allocation as a site of particular sensitivity.			The present suggestion to allocate 1,600 dwellings (in addition to the 761 dwellings (net) already permitted) would represent over-development that would be unsound and unsustainable due to the impact on a historic site and the lack of appropriate transport links. In particular, the greenfield area to the north of Camp Road, east of Larsen Road, is inappropriate for development. Cherwell District Council itself has consistently argued that the site is only appropriate for a maximum of 1,000 houses and has turned down earlier applications.
259/11	Paul	Burrell	Pegasus Group / The Dorchester Group	Main	156		Revise the start of new para C.260 as follows: "C.260 Consultation with English Heritage will be required in formulating specific development proposals for the site based on an update to the current Conservation Area designation. Regard whilst regard should also be had to the following documents in preparing any such scheme: .."			
179/62	Matthew	Bates	Oxford City Council	Main	156	The location of the Upper Heyford site is far less sustainable than the reasonable alternative of an urban extension to Oxford. Objects that the housing allocation has been increased by some 210%. There is no detail of any empirical analysis of the likely transport and traffic impacts available. This option for growth has not been properly assessed against the reasonable alternatives	Should be a cross-reference to new Policy PSD2, a revised BCS1 and supporting text to include much stronger reference to the need for an early Plan review. This is likely to include a strategic Green Belt review, as contingency to ensure delivery of both Cherwell's own Objectively Assessed Housing Need, and further address the unmet needs of the Housing Market Area			
029	Andrew	Hickman	Middleton Stoney Parish Council	Main	157	Object to the housing increase at Former RAF Upper Heyford. After detailed analysis the site was concluded that a settlement of approximately 1,000 dwellings would be more sustainable for the site inclusive of the 314 dwellings already there. The constraints on the site remain the same therefore there is concern for the increase of 600 dwellings on the site. There has been renewed pressure from the site owner (Dorchester Group) to allow further development. The 2014 SHMA was has been seemingly accepted by Central Government and the Local Authority. CDC should not simply accept the SHMA. 2014 SHMA paragraphs 1.62 and 9.63 quoted. The level of additional housing proposed will create serious traffic issues for Middleton Stoney. The WYG Transport Review Report of 21 August acknowledges the issues and within paragraph 1.8 it identifies the serious issues relating in particular to Middleton Stoney as well as other local areas. Paragraphs 1.9-1.13 and 1.23 quoted. Appendix 6 lists the potential developments and sites F to I should not be considered. Only brownfield development should be considered on site. No more than 1,135 dwellings inclusive of the 314 dwellings should be developed on site.	This modification should be abandoned or scaled down substantially to ensure that any development on this site is sustainable and does not have detrimental effect upon surrounding communities, especially the village of Middleton Stoney in regard to traffic impacts.		As it relates to the appraisal of the modifications to allow extra housing at the former RAF Upper Heyford site, we do not believe that this extra development is sustainable.	
142	Alison	Tero	CBRE / Mr H.Jones	Main	157		The policy wording regarding the affordable housing requirement needs to be more flexible. Suggested wording could include " <u>While a target of 30% affordable housing is sought, site specific consideration should be taken into account including the viability of delivery.</u> " Accordingly, the policy wording should be amended to include a caveat that is subject to viability. The third bullet point under Key site specific design and place shaping principles is unnecessary and should be deleted. Further clarification is needed regarding the proposed revised site boundary and whether it is being an extension to the Conservation Area boundary or designated to the application of Policy Villages 5.			Welcomes the Council's approach for amending the housing target in light of the 2014 Strategic Housing Market Assessment (SHMA). Welcomes the Council's approach in identifying sufficient land to meet the revised housing target. Agree with the Council's identification at RAF Upper Heyford. It is important that the unique constraints and the potential difficulties in accommodating further growth within the site boundary do not create a barrier to future housing delivery on the site. It is important that undue development pressure is not placed on the most sensitive areas of the site to ensure that the most significant heritage assets of the site can be preserved. Welcomes the proposed revision to the site's boundary as this will create a more 'complete' development at RAF Upper Heyford rather than following current arbitrary land ownership boundaries. The policy requires at least 30% of affordable housing which is not sufficiently flexible and could stall future planned development.

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037/4	Daniel	Scharf	Oxford Trust for Contemporary History	Main	157			The proposed increase in housing would adversely affect the historic environment making the Plan legally flawed		Establishing the use of the whole flying field for heritage purposes should be the first requirement of any allocation. All new development should be permitted on the basis that it contributes to the primary heritage use. Tourism should also be recognized as an important potential source of jobs.
055/1	J M	Rowe		Main	157					I fully accept the need for a lot of new housing. Little thought is given to the impact of many new people moving into an area will have on the road infrastructure. Take, for example, the plan for Upper Heyford. 200 new houses: 4000 more cars trying to go somewhere every morning to where? And how? Some sort of "feeder" road to the A34 will be needed; as it will be for my own village which may have 125 new houses.
072	Chris	Mullineux	Heyford Park Residents & Community Development Association	Main	157	Support planned growth at Heyford Park but oppose unnecessary use of greenfield land to achieve this	Review of relative importance of spoiled (brownfield) land at Upper Heyford airbase relative to the importance of farmland. Serious review needed of what needs to be retained to protect the ancient monuments on the airbase. This is to be undertaken in the context of the massive change already committed which in itself negate the need to retain everything on the airbase to protect the setting of the buildings considered important. Consider the nationally declared desirability of using brownfield land in preference of farmland.	No comment	Need to review relative importance of spoiled (brownfield) land at Upper Heyford airbase relative to the importance of farmland	Support the principle of further growth as proposed in the Local Plan Modifications (approximately 1,600 more dwellings). The Committee accepts there is an urgent need for more housing nationally and sees Heyford Park as a good location to help satisfy this demand. Support particularly the use of some areas of spoiled land to the west of the existing settlement and some limited additional spoiled land north of Camp Road. However, the Committee has serious concerns about the some of the aspects of the proposal: Opposed to the development of greenfield land to the south ,east and west of the existing built up area. Overstated the case for preservation of substantial parts of the former airbase. Concerned with the increase in housing density for the proposed additional housing and the committed development. Concerned with the scant mention of employment. Existing employment should be retained and increased as the settlement grows. Need to rationalise local road system and address local needs of pedestrian and cyclists, road improvements on the wider road network, public transport to Bicester, Banbury and Oxford, a cemetery and publicly accessible open spaces.
157/1	Richard	Preston	Steeple Aston Parish Council	Main	157	The Local Plan has not given proper consideration and weight to the potential for further development on the brownfield resource at Former RAF Upper Heyford. The policy framework is overly restrictive and could affect the potential of a Mid Cherwell Neighbourhood Plan from considering additional development at this sustainable location. There has not been a proper appraisal of the development capacity. The evidence base (WYG assessment) does not equate to ruling out further development on the flying field. The outcome of a full, detailed assessment has been pre-judged. The policy also makes no substantive allowance for additional employment land which would result in unsustainable travel patterns. The policy also fails to recognise the strategic importance of the site as an employment centre.	Proposals for Upper Heyford should be redrafted to enable a thorough and detailed assessment of the opportunities and constraints that are afforded by the heritage, ecology and transport considerations. To facilitate this, reference to development at the Flying Field being "resisted" should be deleted and replaced with more permissive text. The parish council feels strongly that consideration must be given to further employment opportunities at Heyford Park thus potentially reducing vehicular movement from the site and encouraging a better community for all.			

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158/4	Simon	Greenwood	Savills / New College	Main	157	New College as owner of land within and adjoining the proposed welcomes the proposals to identify Former RAF Upper Heyford as a strategic site for a new settlement in the rural areas. The Upper Heyford Assessment Interim Final Report and The Landscape Sensitivity and Capacity Assessment are welcomed. The policy is welcomed in so far as it goes identifying the scale of housing and employment together with its infrastructure however it should also identify reserved land and the opportunity for further development after the Local Plan Period. The aspiration of providing "at least 30% affordable housing" should be subject to the caveat such that such a provision is subject to viability testing. The abnormal and infrastructure costs are and will be very significant and as such there needs to be flexibility in this if the infrastructure requirements of bringing this predominantly brown field development forward demand a lesser provision.	Include reference to the additional longer terms development opportunities as reserved land. Provide that the affordable housing provision is subject o viability testing.		Comments reflected in the opportunity to create a new settlement at Former RAF Upper Heyford which will provide a comprehensive community if planned as a whole even if part of the proposals would be developed after the plan period.	
161/25	Martin	Small	English Heritage	Main	157		Policy Villages 5, as proposed to be amended, should start: "Development Description: This site will provide for a new settlement. Initial consideration indicates that approximately ??? dwellings could be provided (in addition to the 761 dwellings already permitted) although the exact number will be dependent on further analysis. The new settlement will also provide the necessary supporting infrastructure, including.....and enable environmental improvements and the heritage interest of the site as a military base with Cold War associations to be conserved, compatible with achieving a satisfactory living environment. A comprehensive integrated approach will be expected." A new key site specific design and place shaping principle should be added: "The areas proposed for development adjacent to the flying field will need special consideration to respect the historic significance and character of the taxiway and entrance to the flying field, with development being kept back from the northern edge of the indicative development areas".		English Heritage notes that Table 4.1 sets out "Reasonable Criteria" for identifying reasonable alternatives with respect to the Strategic Development Locations. These criteria include Heritage Assets: "Locations that would cause substantial harm to scheduled monuments, battlefields, Grade I, II* and II listed buildings, Grade I, II* and II registered parks and gardens and Conservation Areas will not be considered reasonable alternatives". Tables 7.1 and 7.7 indicate that the sites at Upper Heyford comply with all the reasonableness criteria except that relating to heritage assets. It is not clear why these sites are then considered to be "reasonable alternatives". Table 8.2 states that minor positive effects are identified for SA Objective 11 for Policy Villages 5.....	English Heritage has provided a statement to accompany this representation setting out the historic significance of the former airbase (<i>see accompanying statement</i>). English Heritage consider that most of this development area is unacceptable in terms of the Rousham, Lower Heyford and Upper Heyford Conservation Area and the setting of the heritage assets, with exceptions on the southern fringe of the proposed development area, i.e. adjacent to the consented development area. This is because much of the area shown as developable comes within the 'national significance' area on the Summary of Significance plan in the Conservation Area Appraisal, and most of the remainder is classed as having regional significance; most of it is also designated as within the 'historic core' in the Revised Comprehensive Planning Brief (and some is subject to ecological constraints).....
161/25	Martin	Small	English Heritage	Main	157		Policy Villages 5, as proposed to be amended, should start: "Development Description: This site will provide for a new settlement. Initial consideration indicates that approximately ??? dwellings could be provided (in addition to the 761 dwellings already permitted) although the exact number will be dependent on further analysis. The new settlement will also provide the necessary supporting infrastructure, including.....and enable environmental improvements and the heritage interest of the site as a military base with Cold War associations to be conserved, compatible with achieving a satisfactory living environment. A comprehensive integrated approach will be expected." A new key site specific design and place shaping principle should be added: "The areas proposed for development adjacent to the flying field will need special consideration to respect the historic significance and character of the taxiway and entrance to the flying field, with development being kept back from the northern edge of the indicative development areas".		Cont.....We feel that this is misleading as the proposed additional development at the Former RAF Upper Heyford could have negative impacts on heritage assets, and certainly this assessment appears to be at odds with the conclusions of Tables 7.1 and 7.7.	Cont..... We therefore have doubts whether a figure of 1,600, or even approximately 1,600 dwellings, can be justified at this stage in terms of the Government's intentions for the conservation and enhancement of the historic environment and heritage assets therein as set out in the National Planning Policy Framework. Whilst we have not undertaken our own detailed calculation of acceptable housing potential, we suggest that a more cautious estimate would be more appropriate. Some of these structures are listed and a few scheduled, with many more deemed to be of national importance, so that their settings need to be preserved - as they could not be in any residential scheme, over this area, which was built out to any normal residential density.

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166/48	Helen	Marshall	CPRE Oxfordshire	Main	157	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	The proposed modifications should therefore be withdrawn, returning to the policy included in the original submission document (31 Jan 2014). Failing this, at the very least the greenfield area to the north of Camp Road, east of Larsen Road, should be removed from the allocation as a site of particular sensitivity.			The present suggestion to allocate 1,600 dwellings (in addition to the 761 dwellings (net) already permitted) would represent over-development that would be unsound and unsustainable due to the impact on a historic site and the lack of appropriate transport links. In particular, the greenfield area to the north of Camp Road, east of Larsen Road, is inappropriate for development. Cherwell District Council itself has consistently argued that the site is only appropriate for a maximum of 1,000 houses and has turned down earlier applications.
186/5	Rob	Kinchin-Smith	Banbury Civic Society	Main	157	The Former RAF Upper Heyford is one of Oxfordshire's most notable heritage sites, on account of its internationally important Cold War heritage. Cannot see a reason why this site is suddenly capable of sustainably accommodating so many additional homes without also causing substantial harm to the same assets of the highest importance. Without a Green Belt Review, it remains unproven that there are not more sustainable potential housing sites closer to Oxfordshire's natural centres for development.				
187/3	Alan	Hedges		Main	157		The much lower housing numbers as proposed in the original draft Local Plan should be reinstated.			Permission is already outstanding for 1060 homes, which represents an increase of about 50% in the population of Upper Heyford Parish, and was judged in the last Oxfordshire Structure Plan as being a suitable maximum for the site. The site has since been designated as a Cold War Heritage site, which places further constraints on its capacity. The proposed change results in an increase to the housing number to approximately 3000 houses. A settlement of this size is not large enough to be self-contained, but would for example make substantial increases in traffic on local roads, some of which are already stressed. Road infrastructure is inadequate and measures to increase capacity would have damaging consequences for this predominantly rural environment. The change is as a result of the excessive demands of the SHMA numbers.
192/3	Paul	Weaver		Main	157		The housing numbers as proposed in the original draft Local Plan should be reinstated.			Permission is already outstanding for 1060 homes, which represents an increase of about 50% in the population of Upper Heyford Parish, and was judged in the last Oxfordshire Structure Plan as being a suitable maximum for the site. The site has since been designated as a Cold War Heritage site, which places further constraints on its capacity. The proposed change results in an increase to the housing number to approximately 3000 houses. A settlement of this size is not large enough to be self-contained, but would for example make substantial increases in traffic on local roads, some of which are already stressed. Road infrastructure is inadequate and measures to increase capacity would have damaging consequences for this predominantly rural environment. The change is as a result of the excessive demands of the SHMA numbers.
226/1	Cllr Catherine	Fulljames	Ploughly Division OCC	Main	157					Strongly opposes the proposal for 1,600 dwellings at the former Upper Heyford base as the site is isolated and the location is unsustainable. Encouraging journeys by other modes is unrealistic and the car park at the nearest station at Lower Heyford is full.
226/2	Cllr Catherine	Fulljames	Ploughly Division OCC	Main	157					Public inquiries were conducted at considerable expense to the public purse and both were rejected as the site was considered unsustainable. Since 2010 nothing has changed except there is now more traffic on the roads locally and the junction at Middleton Stoney is already at full capacity (junction B430/B4030). Traffic will be generated from commercial developments and the incinerator.

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254/4	Mark	Mathews	Thames Water	Main	157					Thames Water has no comments to make on the main modifications or IDP text. The supply and sewage treatment networks are unlikely to be able to support the demand anticipated from Former RAF Upper Heyford. Investigations will be required. If upgrading is required there could be a delay of up to 3 years. The following paragraph is suggested for inclusion in the Local Plan: <u>"Developers will be required to demonstrate that there is adequate waste water capacity both on and off the site to serve the development and that it would not lead to problems for existing or new users. In some circumstances it may be necessary for developers to fund studies to ascertain whether the proposed development will lead to overloading of existing waste water infrastructure."</u>
259/3	Paul	Burrell	Pegasus Group / The Dorchester Group	Main	157	The modification does not properly appraise the capacity that exists within the brownfield site Former RAF Upper Heyford, to accommodate significantly higher levels of development, whilst preserving and where appropriate positively enhancing the heritage assets on the site.	The Plan should commit to a properly considered review of the Upper Heyford site to identify its true capacity on more mature reflection with appropriate text included in the plan. Dorchester Group is committed to work with the Council to enable such a study to be conducted as part of an early review of the plan. The change in terminology from new development being "restricted" to "resisted" on the flying field is wrong as it prevents proper consideration of suitable and appropriate development opportunities. It is not clear what is meant by the "flying field". The policy is grossly over prescriptive and should be substantially reduced with a commitment to formulating more detailed development principles as part of a strategic review which could involve a revised version of the existing masterplan for the site. The policy fails to provide for additional employment land, other than a broad statement to ensure any additional employment is accommodated primarily within existing buildings or on limited greenfield land to the south of Camp Road. Policy rewording is suggested: (cont.)		The SA sets out a more considered approach to future development options at the site in the context of site constraints when compared to Policy Villages 5 as modified. It recognises the potential for development to have a significant adverse effect on heritage, landscape and ecology, but recognises scope for mitigation and indicates that significant adverse effects will only occur if future development is not carefully planned and designed. Two broad reasonable alternative housing locations are considered; intensification of housing on the existing allocated site and development on land abutting the southern and eastern boundary of the site.....	A revised policies map for Former RAF Upper Heyford to accompany the revised wording for Policy Villages 5 forms part of the submission. Reference is made to the limitations of the WYG Upper Heyford Assessment August 2014 (expressed in paragraph 301 of the report). The submission is accompanied by a report by Oxford Archaeology Review "Former RAF Upper Heyford Strategic Housing Availability 2014" which concludes that none of the Council reports have given detailed consideration to the potential range of development areas on the brownfield site, such that the site selection process does not have an objective basis informed by a balanced appraisal of the site as a whole. The submission is also accompanied by a report prepared by The Prince's Foundation in September 2012.
259/3	Paul	Burrell	Pegasus Group / The Dorchester Group	Main	157		(cont.) Policy Villages 5: "Development Description: This site will provide for a sustainable settlement of approximately of at least 1,600 dwellings (in addition to the 761 dwellings (net) already permitted) together with and necessary supporting infrastructure, including a primary school and appropriate community, recreational and employment opportunities, as well as a local centre. Such development should secure enabling environmental improvements and should demonstrate that the heritage interest of the site as a military base with Cold War associations to be conserved, compatible with achieving a satisfactory living environment. A comprehensive integrated approach will be expected." (cont) "Housing: Number of homes- at least approximately 1,600 (in addition to the 761 (net) already permitted, Affordable housing at least 30% Consistent with Policy BSC3 and subject to viability" (cont.)		Cont.....There is little difference between the two options, with intensification of the existing site only scoring less positively on biodiversity, landscape and heritage assessment, which cannot be justified due to lack of detailed site assessment. Scoring should reflect mitigation and enhancement.	
259/3	Paul	Burrell	Pegasus Group / The Dorchester Group	Main	157		(cont.) "Employment: Land area- at least approx 120,000 sq- metres sq. Metres , Job created- approx 1500, Use classes- B1, B2, B8, Any additional employment opportunities further to existing consent to be considered as part of a wider detailed assessment of the future development opportunities at the Former RAF Upper Heyford site, to be accommodated primarily within existing buildings within the overall site where appropriate or on limited greenfield land to the south of Camp Road " (cont.)			

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259/3	Paul	Burrell	Pegasus Group / The Dorchester Group	Main	157		<p>(cont.) "Infrastructure Needs All development proposals will be expected to contribute as necessary towards the delivery of infrastructure provision through onsite provision or an appropriate off-site financial contribution towards provision elsewhere in the wider site allocation, including the following:</p> <ul style="list-style-type: none"> Education – contributions to primary and secondary school place provision Health – contributions required to health care provision Open Space – sports pitches, sports pavilion, play areas, indoor sport provision Community Facilities – nursery, community hall, local centre/hotel, education provision, a neighbourhood police facility Access and Movement – transport contributions and sustainable travel measures as detailed below, countryside access measures, fencing along the boundary of the new settlement and the Flying Field Utilities – contamination remediation. Improvements to the water supply and sewage network, as well as other utilities, may be required." (cont.) 			
259/3	Paul	Burrell	Pegasus Group / The Dorchester Group	Main	157		<p>(Cont) "Key site specific design and place shaping principles:</p> <ul style="list-style-type: none"> All proposals must demonstrate that the conservation of heritage resources, landscape, restoration, enhancement of biodiversity and other environmental improvements will be achieved across the whole of the site identified as Policy Villages 5 former airbase in association with the provision of the settlement In order to avoid development on the most historically significant and sensitive parts of the site, new development is to be focused to the south of the flying field and on limited greenfield land to the south of Camp Road (and one greenfield area to the north of Camp Road, east of Larsen Road). The release of greenfield land within the allocated site Policy Villages 5 will not be allowed to compromise the necessary environmental improvements and conservation of heritage interest of the wider site. Cont..... 			

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259/3	Paul	Burrell	Pegasus Group / The Dorchester Group	Main	157		<p>(cont) All development The settlement should be designed to encourage walking, cycling and use of public transport rather than travel by private car, with the provision of footpaths and cycleways that link to existing networks. Improved access to public transport will be required including considering the provision of linkages between the site and the train station at Lower Heyford.</p> <p><input checked="" type="checkbox"/> Development should accord with Policy ESD16 and include layouts that maximise the potential for walkable neighbourhoods with a legible hierarchy of routes". <input checked="" type="checkbox"/> Retention and enhancement of existing Public Rights of Way, and the provision of links from the development to the wider Public Rights of Way network</p> <p><input checked="" type="checkbox"/> Layouts should enable a high degree of integration with development areas within the Policy Villages 5 allocation, with connectivity between new and existing communities</p> <p><input checked="" type="checkbox"/> and m Measures to minimise the impact of traffic generated by the development on the surrounding road network will be required through funding and/or physical works, including to any necessary capacity improvements around Junction 10 of the M40, and to the rural road network to the west of the site and around Middleton Stoney including traffic calming and management measures. (cont.)</p>			
259/3	Paul	Burrell	Pegasus Group / The Dorchester Group	Main	157		<p>(cont.) Development should provide for good accessibility to public transport services and a plan for public transport provision should accompany any planning application. Design and layout should reflect the management and mitigation of noise impacts associated with the development. A Travel Plan should accompany any development proposals.". "The construction of the settlement on the former technical core and residential areas should retain buildings, structures, spaces and trees that contribute to the character and appearance of the site and integrate them into a high quality place that creates a satisfactory living environment <u>subject to viability</u>.</p> <p><input checked="" type="checkbox"/> Integration of the new community into the surrounding network of settlements by reopening historic routes and encouraging travel by means other than private car. as far as possible</p> <p><input checked="" type="checkbox"/> The preservation of the stark functional character and appearance of the flying field beyond the <u>developable settlement</u> area, including the retention of buildings of national interest which contribute to the area's character (with limited, fully justified exceptions). and sufficient low key re-use of these to enable appropriate management of this area. (cont.)</p>			

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259/3	Paul	Burrell	Pegasus Group / The Dorchester Group	Main	157		<p>(cont.)</p> <p><input checked="" type="checkbox"/> The achievement of environmental improvements within the site and of views to it including the removal of buildings and structures that do not make a positive contribution to the special character or which are justified on the grounds of adverse visual impact, including in proximity to the proposed settlement, together with limited appropriate landscape mitigation, and reopening of historic routes." "The conservation and enhancement of the ecological interest of the Flying Field through appropriate management and submission of an Ecological Mitigation and Management Plan, with biodiversity preserved and enhanced across the site identified as Policy Villages 5, and wildlife corridors enhanced, restored or created, including the provision for habitat for great crested newts and ground nesting birds in particular. A net gain in biodiversity will be sought.</p> <p><input checked="" type="checkbox"/> Development should protect and enhance the Local Wildlife Site (including the new extension to the south)</p> <p><input checked="" type="checkbox"/> Visitor access, controlled where necessary, to (and providing for interpretation of) the historic and ecological assets of the site.</p> <p><input checked="" type="checkbox"/> Provision of a range of <u>suitably located</u> high quality employment opportunities, <u>including additional employment land, consistent with creating a sustainable mixed used community, informed the by the conclusions of the Conservation Area review.</u> (cont)</p>			
259/3	Paul	Burrell	Pegasus Group / The Dorchester Group	Main	157		<p>(cont.) capable of being integrated into the fabric of the settlement, and providing that the use would not adversely affect residents or other businesses and would not have an unacceptable impact on the surrounding landscape, historic interest of the site, or on nearby villages.</p> <p><input checked="" type="checkbox"/> New and retained employment buildings should make a positive contribution to the character and appearance of the area and should be located and laid out to integrate into the structure of the settlement."Arboricultural surveys to be undertaken to inform the future masterplanning process. A full arboricultural survey should be undertaken to inform the masterplan, incorporating as many trees as possible and reinforcing the planting structure where required.</p> <p><input checked="" type="checkbox"/> New development should comprise reflect high quality design that responds to the established character of the district character areas and where this would preserve or enhance the appearance of the Former RAF Upper Heyford updated Conservation Area together with other designated heritage assets. A.</p> <p><input checked="" type="checkbox"/> New development should also preserve or enhance the character and appearance of the Rousham, Lower Heyford and Upper Heyford Conservation Area, as well as the Oxford Canal Conservation Area, and their settings (cont)</p>			

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259/3	Paul	Burrell	Pegasus Group / The Dorchester Group	Main	157		(cont.) <input checked="" type="checkbox"/> Development on greenfield land within Policy Villages 5 should provide for a well-designed, “soft” approach to the urban edge, with appropriate boundary treatments <input checked="" type="checkbox"/> Management of the Flying Field should preserve and where possible deliver enhancements to the Cold War character of this part of the site, and allow for public access. New built development on the Flying Field will be required to demonstrate that the impacts are acceptable in terms of heritage and ecological constraints and will be resisted should be restricted to preserve or enhance the character and appearance of the area. Development proposals should be informed by a Landscape and Visual Impact Assessment and a Heritage Impact Assessment. Proposals should demonstrate an overall management approach for the whole site. <input checked="" type="checkbox"/> A neighbourhood centre or hub should be established at the heart of the settlement to comprise a primary school and nursery facilities , community hall, place of worship, shops, public house, restaurant, and social and health care facilities. Proposals should also provide for a heritage centre given the historic interest and Cold War associations of the site. (cont.)			
259/3	Paul	Burrell	Pegasus Group / The Dorchester Group	Main	157		(cont.) <input checked="" type="checkbox"/> The removal or remediation of contamination or potential sources of contamination will be required across the whole site. <input checked="" type="checkbox"/> The scale and massing of new buildings should respect their context. Building materials should reflect the locally distinctive colour palette and respond to the materials of the retained buildings within their character area, without this resulting in pastiche design solutions. <input checked="" type="checkbox"/> Public art should be provided. <input checked="" type="checkbox"/> Recycling and potential reuse of demolition materials where possible. <input checked="" type="checkbox"/> The provision of extra care housing and the opportunity for self build affordable housing in accordance with Policies BSC 3 and BSC 4 affordable housing and an appropriate mix of housing consistent with Local Plan policies BSC 3 and BSC 4. Public open space should be provided to form a well connected network of green areas, suitable for formal and informal recreation as part of a wider Green Infrastructure Strategy. "Provision of Green Infrastructure links to the wider development area and open countryside" <input checked="" type="checkbox"/> Take account of the Council's Strategic Flood Risk Assessment for the site (cont.)			
259/3	Paul	Burrell	Pegasus Group / The Dorchester Group	Main	157		(cont.....) <input checked="" type="checkbox"/> Provision of sustainable drainage including SuDS in accordance with Policy ESD 7: Sustainable Drainage Systems (SuDS), taking account of the Council's Strategic Flood Risk Assessment. Development should be set back from watercourses. <input checked="" type="checkbox"/> Demonstration of climate change mitigation and adaptation measures including exemplary demonstration of compliance with the requirements of policies ESD1 – 5. <input checked="" type="checkbox"/> Development on the site will be required to investigate the potential to make connections to and utilise heat from the Ardley Energy from Waste facility to supply the heat demands of residential and commercial development on the site <input checked="" type="checkbox"/> In all instances development proposals will be subject to the other appropriate development plan policies"			

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285/1	Josephine	Allen	Upper Heyford Parish Council	Main	157	Planned growth at Heyford Park is supported but the proposal should be amended to protect greenfield sites; more of the brownfield space should be utilised. Significant work is needed to adequately address transport infrastructure and social amenities. The rural village nature of Upper Heyford should be protected.	The plan should make it clear that any substantive increase beyond 1600 additional homes is not sustainable and will not be accepted, and should minimise/eliminate the need to build on green field land adjacent to Heyford Park. There is scope for housing in brownfield areas north of Camp Road and south of the main runway. A buffer is needed between Heyford Park and Upper Heyford, with the western boundary screened by tree and hedgelines, and development should not extend to the edge of the boundary at the Kirtlington Road (Portway), or have entrances from the western boundary. Land up to Portway could be considered for cemetery use. Green space for Heyford Park residents must be included to reduce demand for use of the canal and Upper Heyford village; the inclusion of a portion of the site as a country park and adequate dog walking areas are needed. Detailed investigation is still needed to determine whether sufficient infrastructure can be provided to support a community with over 2700 homes, including medical facilities, schools, community retail and leisure facilities. The overriding concern is traffic and the impact on the rural road network. (Further detail on the main transport issues is provided)			The main transport issues are identified as: Development would result in roads being over capacity, there is insufficient parking capacity at Heyford and Bicester stations, insufficient capacity on the rail service from Heyford, inadequate consideration of safe walking and cycling routes, insufficient scope for providing targeted measures to improve capacity at congested areas e.g. Middleton Stoney and A34, no "rural road" protocol, inadequate consideration of traffic diversion and associated impact on nearby villages, and little consideration of environmental impact in relation to carbon emissions. In addition the Parish Council would oppose development for commercial use as the roads are not suitable for HGVs, and observes that it is probable that the local community could not meet employment needs, which would generate additional transport demands.
286/1	Ian	Lough-Scott	Upper Heyford Village Residents Group	Main	157	Protection of rural character: development of the size proposed would have a detrimental impact on the character of the surrounding countryside as a result of increased traffic and general commercial activity. The surrounding road network are attractive rural roads through small villages unsuitable for upgrading apart from perhaps a few minor improvements; in particular the historic Rousham Bridge at Lower Heyford should not be modified.	Prefer implementation of saved Structure Plan policy H2 to allow the Heyford Park community to grow organically. It accepts CDC must make provision for SHMA housing numbers and as a result additional homes will be located at Heyford Park. No objection to areas A, B, C, D from the WYG evidence base document. With reference to site E, as much green space as possible should be retained between Upper Heyford village and Heyford Park and housing should not extend to the boundary edge, and access points should not be punched through the hedge. The hedge is an important visual barrier in respect of the village and the Rousham Conservation Area. Areas F and G should be possible future building land rather than forming part of the current project as it would be disappointing to see agricultural land used for housing. Area H is the least suitable as the land is on the edge of the Cherwell Valley and impinges on the Rousham Conservation Area. Area I is considered the most acceptable of the greenfield sites. In terms of the mix of homes, the long term housing need of existing tenants needs to be addressed. The house type currently under construction are predominantly large detached dwellings; a greater variety is needed to meet the housing needs of local people, which should be the main purpose of the SHMA.			
296/6	Kildare	Bourke-Borrowes	North Aston Parish Meeting	Main	157	The capacity within the brownfield area of the site has not been appraised properly, the evidence base only looks at the broad capacity of the area. A detailed capacity assessment should be undertaken to analyse its ability to provide more dwellings and expand the well established strategic employment base, before constraint policies are adopted. The plan fails to recognise the strategic importance of the site as an employment centre and its ability to expand.	Policy Villages 5 should be amended to respond positively to the opportunities that exist on this large brownfield site, and should be re-drafted to enable a thorough and detailed assessment of the opportunities and constraints that are afforded by the heritage, ecology and transport considerations. To facilitate this the reference to development on the flying field being resisted should be deleted and replaced with more permissive text to allow for proposals to be properly considered.			
300/17	Penny	Silverwood	Berks, Bucks and Oxon Wildlife Trust (BBOWT)	Main	157					Support bullet points 3 (greenfield land), 16 (Flying Field), 17 (Local Wildlife Site), 34 (Public open space) and 35 (Green Infrastructure) under Key site specific design and place shaping principles.
076/1	Cllr Mike	Gotch		Main	157					There should be a large new village at Upper Heyford with employment and a medical centre with good rail and road links on this brownfield site.

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179/63	Matthew	Bates	Oxford City Council	Main	157	The location of the Upper Heyford site is far less sustainable than the reasonable alternative of an urban extension to Oxford. Objects that the housing allocation has been increased by some 210%. There is no detail of any empirical analysis of the likely transport and traffic impacts available. This option for growth has not been properly assessed against the reasonable alternatives	Should be a cross-reference to new Policy PSD2, a revised BCS1 and supporting text to include much stronger reference to the need for an early Plan review. This is likely to include a strategic Green Belt review, as contingency to ensure delivery of both Cherwell's own Objectively Assessed Housing Need, and further address the unmet needs of the Housing Market Area			
179/64	Matthew	Bates	Oxford City Council	Main	157	Given Policy Villages 2 covers a wide area of Cherwell, the test of identifying 'broad locations' appears not to have been met. This provides little certainty to residents and stakeholders in terms of where in future this housing growth will be directed to. There is also inadequate evidence that sites to support this level of growth can be delivered. Even if sites identified in the SHLAA can be relied on ahead of the Local Plan Part 2, there is little evidence that sustainability of (as yet undefined) locations, including infrastructure requirements, has been considered	Early Plan review to allow proper consideration. Accept the need for a review of the Oxford Green Belt north of Oxford in the short term, rather than to increase rural housing supply. There should be cross-reference to new Policy PSD2 and a revised BCS1 and supporting text to include much stronger reference to the need for an early Plan review. This is likely to include a strategic Green Belt review, as contingency to ensure delivery of both Cherwell's own Objectively Assessed Housing Need, and further address the unmet needs of the Housing Market Area.			
301/86	Bev	Hindle	Oxfordshire County Council	Main	157	<p>Policy Villages 5 – Former RAF Upper Heyford Energy - The requirement to investigate the potential to make connections to and utilise heat from the Ardley ERF to supply the heat demands of residential and commercial development is supported. Viridor have renamed the Ardley Energy from Waste Facility to Ardley Energy recovery Facility in line with company policies for all their facilities.</p> <p>Archaeology - The site is located in an area of archaeological potential as identified by a desk based assessment for earlier applications for the site. Iron Age and Roman settlement has been recorded within the area of the airfield and a possible Anglo Saxon cemetery has also been identified within the area. An archaeological evaluation has shown that archaeological deposits do survive in the area of the base however the development of the airbase would have disturbed parts of the site.</p> <p>Ecology - Former RAF Upper Heyford contains a Local Wildlife Site and a very large population of Great Crested Newts. However, the proposed site allocation appears to avoid the most sensitive areas of the site. The District Council should seek the advice of their own ecologist to ensure that all impacts can be avoided or mitigated.....</p>	<p>Change reference to 'Ardley Energy from Waste facility' to "Energy Recovery Facility".</p> <p>Amend the wording in the Key site specific design and place shaping principles section to include: <u>"An archaeological field evaluation to assess the impact of the development on archaeological features"</u></p> <p>Amend text as follows: "All development proposals will be expected to contribute as necessary towards the delivery of infrastructure provision through onsite provision or an appropriate off site financial contribution towards provision elsewhere in the wider site allocation" <u>"Improved access to public transport will be required including considering the provision of linkages between the site and the train station at Lower Heyford"</u></p> <p>Amend text as follows: "Development should <u>will</u> provide for good accessibility to public transport services and a plan for public transport provision should <u>will</u> accompany any planning application".....</p>			
301/86	Bev	Hindle	Oxfordshire County Council	Main	157	<p>Cont..... Transport - Under Infrastructure Needs, it states 'All development proposals will be expected to contribute as necessary towards the delivery of infrastructure provision through onsite provision or an appropriate off-site financial contribution towards provision elsewhere in the wider site allocation'. Some of the transport mitigation required will be outside of the wider site allocation "Improved access to public transport will be required including considering the provision of linkages between the site and the train station at Lower Heyford" suggests that Lower Heyford PT provision is the most important PT consideration for development mitigation. OCC are modelling improved services to Oxford and Bicester, as well as a new service to Banbury. As a result, removal of reference to Lower Heyford station is recommended. It is considered that "Development should provide for good accessibility to public transport services and a plan for public transport provision should accompany any planning application" is not strong enough as OCC modelling has suggested that PT provision as a mitigation requirement will be essential.</p> <p>Education - The text states: "Development Description: This site will provide for a settlement of approximately 1,600 dwellings (in addition to the 761 dwellings (net) already permitted) and necessary supporting infrastructure, including a primary school..."</p>	<p>Cont...Amend text as follows: "Development should <u>will</u> provide for good accessibility to public transport services and a plan for public transport provision should <u>will</u> accompany any planning application".</p> <p>Amend the text as follows: "Development Description: This site will provide for a settlement of approximately 1,600 dwellings (in addition to the 761 dwellings (net) already permitted) and necessary supporting infrastructure, including a primary and secondary education provision school."</p> <p>Under 'Infrastructure Needs: <u>"Education – provision of a 2.22 ha site for a new 1-1.5 form entry primary school and contributions to primary and secondary school place provision"</u></p>			

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047/45	Matthew	Coyne	Banbury Town Council	Main	158					Objects to removal of primary school provision from infrastructure delivery plan resulting from reduction of housing from 950 to 700 on Canalside site (Banbury 1) Primary school provision should be looked at holistically taking into account all sites.
190/1	Sean	Bashforth	Quod / SGR (Bicester 2) Ltd	Main	159	A site was submitted during the SHLAA Call for Sites in June 2014 which would potentially accommodate an additional 89 homes to the 6000 homes proposed at North West Bicester (Bicester 1). This potential was not reflected in the Council's SHLAA.		The evidence base underpinning the increase in homes from 5000 to 6000 is robust and, as demonstrated in SGR Limited's representations, may be conservative with the site additionally capable of accommodating a further 89 homes.	No comment	
166/38	Helen	Marshall	CPRE Oxfordshire	Main	160	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.				There are no special circumstances which can be demonstrated to justify small local reviews of the Green Belt, and that by introducing their possibility the Council will open itself to a welter of applications to develop within the Green Belt based on imagined "special circumstances" driven solely by a desire for commercial advantage. The planned industrial and residential developments at Oxford's Northern Gateway and at Bicester seem to provide more than adequate relief for any needs Kidlington may have in the Plan period. Added to this the proposal for Woodstock to expand by a 1,500 dwellings to be built on land south of Perdiswell Farm on the Shipton on Cherwell road (scoping application 14/00049/SCOP - received just after the Local Plan modifications were issued, but not included in those modifications), suggests that any additional housing requirements in the vicinity of Kidlington are not going to be an issue.
207/7	Jacqueline	Mulliner	Terence O'Rourke Ltd / Blenheim Palace Estate	Main	160	No justification for an amended spatial distribution of homes and that the Plan, as drafted and modified, will not contribute to the aims and objectives of sustainable development if such a restrictive approach is applied to Kidlington. Oppose the term small scale Green Belt review with reference to Kidlington. Oppose the reference solely to the village's housing needs.	Revise reference from "small-scale" to "moderate-scale" review of the Green Belt. Replace references to "local housing needs" with "housing needs necessary to support economic growth and the achievement of sustainable development."			
223/5	Patricia	Redpath	Kidlington Parish Council	Main	160					The Parish Council is concerned about the change in position regarding the sentence "further small scale local review of the green belt boundary around Kidlington will also be undertaken as part of Local plan part 2 if the villages local needs cannot be accommodated within the built up area" and continues to take the view that the Green Belt around Kidlington should be protected but is inclined to accept that the logic of the modification, given that an insufficient number of possible development sites have been identified within the village boundaries and subject to completion of a local housing needs assessment. However the Parish Council is seeking reassurance on how Kidlington's housing needs will be assessed and a decision reached on whether the local review of the Green Belt will be necessary. It also takes the view that while any Green Belt should only be concerned with Kidlington's housing needs, it should address all possible options for meeting them. Require confirmation that these issues will be addressed in a dialogue with the Council through the masterplan process.
229/21	Nik	Lyzba	JPPC / The Tripartite (Oxford University, Merton College and R.Smith)	Main	160					The need for a green belt review around Begbroke is supported for the reasons set out above. It is noted that the need to accommodate local housing needs is regarded as sufficient to lead to a potential review of the green belt around Kidlington.

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264/8	Andrew	Hornsby-Smith		Main	160			Supports these modifications which allow for the possibility that whilst the initial purpose of the local Green Belt review is for employment, a later review could encompass the remainder of the area of search once Kidlington's local housing need has been assessed further. This is highly likely to trigger the need for a local Green Belt review.		
179/65	Matthew	Bates	Oxford City Council	Main	160	Object that the Plan now provides a policy mechanism for reviewing the Green Belt around Kidlington to meet "local" housing need, relating to the increase in the rural housing allocation, whilst not recognising that this is also part of, and inseparable from, the wider needs of the HMA.	If the Plan were to progress, the City Council insists that references to 'local' Green Belt reviews are deleted and instead text introduced into Policy ESD14 and supporting text to set out a timetable for a strategic joint review of the Green Belt, should this be necessary (as expected) to meet both Cherwell's housing needs and those of the wider HMA (detailed suggestions provided)			
179/66	Matthew	Bates	Oxford City Council	Main	160	Para D.22a of the IDP needs to change to reflect the need for changes to Policy ESD14 regarding a strategic green belt review	Amend the IDP, para' D.22a to read as follows: The Local Plan does not allocate specific sites for growth within the rural areas, other than making an allocation for a new settlement at the Former RAF Upper Heyford, but contains strategic policies for the distribution of growth. Policy Kidlington 1 identifies small-scale the need for a Green Belt review at Kidlington and Begbroke for employment purposes (whilst Policy ESD 14 acknowledges that a small-scale strategic Green Belt review of the boundaries around Kidlington may be required as part of Local Plan Part 2, would consider the need to accommodate the village's local housing need) and Policy Kidlington 2 aims to strengthen Kidlington's village centre. These policies are important to attract investment.			
190/2	Sean	Bashforth	Quod / SGR (Bicester 2) Ltd	Main	161	A site was submitted during the SHLAA Call for Sites in June 2014 which would potentially accommodate an additional 89 homes to the 6000 homes proposed at North West Bicester (Bicester 1). This potential was not reflected in the Council's SHLAA.		The evidence base underpinning the increase in homes from 5000 to 6000 is robust and, as demonstrated in SGR Limited's representations, may be conservative with the site additionally capable of accommodating a further 89 homes.	No comment	
162/2	Val	Russell	Bodicote parish council	Main	162					Objections to the revised new site for Banbury Football Club. The sustainability of the current site of Banbury Football Club is far superior to the proposed site, as the current site is close to the bus and train station and the M40, as well as enabling Banbury residents to walk to the site. If re-located south of the Rugby Club, this would bring even more traffic problems to the Oxford Road. In addition, the proposed site is only one field away from Twyford/Adderbury, which would be dangerously close to coalescence.
161/26	Martin	Small	English Heritage	Main	163					(Although not, in itself, a reason to consider the Plan unsound, English Heritage has concerns about the figure of 1,600 dwellings being proposed for the Former RAF Upper Heyford – see our comments on Proposed Modification 157).
207/11	Jacqueline	Mulliner	Terence O'Rourke Ltd / Blenheim Palace Estate	Main	163	Do not consider that the increase in provision to Kidlington is sufficient to achieve sustainable development. A separate allocation of housing requirement should be apportioned specifically to Kidlington/Begbroke to reflect its role as a service centre and location of significant and growing employment opportunities.	Increase housing provision for the rural areas (including Kidlington) to 6,400 dwellings. Require at least 1,000 dwellings to be accommodated at Kidlington, through Green Belt review.			
223/9	Patricia	Redpath	Kidlington Parish Council	Main	163					The Parish Council accepts that removing the separate target for Kidlington under policy villages 2 allows for a greater degree of flexibility.
229/22	Nik	Lyzba	JPPC / The Tripartite (Oxford University, Merton College and R.Smith)	Main	163					The provision for future growth including a green belt review around Begbroke Science Park is supported. Such review would need to reflect the University's aspirations in relation to the Science Park. The Key Policies Map should reflect these.

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264/12	Andrew	Hornsby-Smith		Main	163	Upper Heyford is in an unsustainable location, and an assessment of Kidlington's housing need is likely to identify need for up to 1700 new homes, therefore a housing target of only 750 homes for category A villages is likely to lead to unsustainable in-commuting to Kidlington, forcing house prices up and precluding young families from remaining in the area, which already has a shortage of affordable housing.	The Category A housing figure should be increased significantly to allow at least part of the unmet housing need to be met locally. It would be preferable for Kidlington to have a separate allocation but it is accepted that this would be premature prior to an actual needs assessment.			
050/1	Rita	Palmer		Main	164					Any loss of playing fields or recreational facilities should be relocated to other parts of the site . Green space and playing should never be lost.
034/1	Edward	Dowler	Middle Aston Parish Council	Main	165					Mod No. 165 dilutes the role and significance of Neighbourhood Planning by not acknowledging the weight emerging and adopted Neighbourhood Plans should be given. To simply list Neighbourhood Planning alongside determination via speculative planning applications, undermines the value National Planning Policy has given to adopted and emerging Neighbourhood Plans.
096/2	John	Coley	Steeple Aston Parish Council	Main	165	Modification 165 dilutes the role and significance of Neighbourhood Planning by not acknowledging the weight emerging and adopted Neighbourhood Plans should be given. To simply list Neighbourhood Planning alongside determination via speculative planning applications undermines the value National Planning Policy has given to adopted and emerging Neighbourhood Plans.	Policy Villages 2 requires further refinement so as not to act as an impediment to the preparation of neighbourhood plans and so that the Local Plan can respond to new opportunities for growth identified by the Neighbourhood Planning Process.			
203/2	Sheila	Ultsch	Fritwell Parish Council	Main	165	This dilutes the role and significance of Neighbourhood Planning by not acknowledging the weight emerging and adopted Neighbourhood Plans should be given.				
209/2	John	Stranks	Duns Tew Parish Council	Main	165	The modification dilutes the role and significance of Neighbourhood Planning by not acknowledging the weight emerging and adopted Neighbourhood Plas should be given.				
220/2	Ian	Corkin	Ardley with Fewcott Parish Council	Main	165	The modification dilutes the role and significance of Neighbourhood Planning by not acknowledging the weight emerging and adopted Neighbourhood Plas should be given.				
247/5	Ruth	Powles	Kirtlington Parish Council	Main	165	Modification 165 dilutes the role and significance of Neighbourhood Planning by not acknowledging the weight which emerging and adopted Neighbourhood Plans should be given. To list Neighbourhood Planning alongside determination via speculative planning applications undermines the value National Planning Policy has given to adopted and emerging Neighbourhood Plans.	The Modified Policy Villages 2 requires further refinement to ensure that it does not act as an impediment to the preparation of Neighbourhood Plans, and to ensure that the Local Plan can be responsive to new opportunities for growth identified by the Neighbourhood Planning process which should not be unnecessarily constrained by the policies and strategies of the Local Plan.			
296/1	Kildare	Bourke-Borrowes	North Aston Parish Meeting	Main	165	The modification dilutes the role and significance of Neighbourhood Planning by not acknowledging the weight emerging and adopted Neighbourhood Plans should be given. To list Neighbourhood Planning alongside determination via speculative planning applications undermines the value National Planning Policy gives to adopted and emerging Neighbourhood Plans.	The plan should give proper consideration and weight to the Neighbourhood Planning process and not be over prescriptive regarding development in the rural areas.			

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164/14	Sarah	Smith	Rapleys LLP / Pandora Trading Ltd	Main	167	Objection is made to the housing trajectory as identified in Table 15 of the Local Plan. It is considered that the trajectory identified is overly optimistic and ambitious, particularly in an attempt to realise a five year supply.	The table should be amended to reflect a more realistic housing delivery trajectory identified with this submission.		Not in relation to this modification. Comments are provided on the Sustainability Appraisal under a separate representation.	It is considered that the completion levels suggested within the five year period will simply not be achievable: The general slow speed of the economic recovery relative to house building and the availability of mortgages: Banbury's recent ineffectual level of housing completions/delivery: The considerable increase in annual completions required over the plan period: Applications are yet to be submitted on a number of the strategic allocation sites; There are no known specific house builder interests in a number of the sites (i.e Banbury 16, 17, 18): There are indicators in the market that perhaps some of the proposed allocations are not of sufficient critical mass to deliver a viable scheme, and that such a viable scheme can only be delivered in association with other land within the green buffer: With requirement such as Design Codes and submission of reserved matters, it will be at least eighteen months to two years post the grant of an outline permission before any construction of dwellings commence – this will delay the number of units coming forward in the first five years of the plan period.....
164/14	Sarah	Smith	Rapleys LLP / Pandora Trading Ltd	Main	167	Objection is made to the housing trajectory as identified in Table 15 of the Local Plan. It is considered that the trajectory identified is overly optimistic and ambitious, particularly in an attempt to realise a five year supply.	The table should be amended to reflect a more realistic housing delivery trajectory identified with this submission.		Not in relation to this modification. Comments are provided on the Sustainability Appraisal under a separate representation.	Cont.....The first five years 2014-2019 suggest an average of 1,664 dwelling completions per annum, which in itself is considerably more than the overall pan period requirement of 1,140pa (already considered ambitious): The trajectory suggests 2,345 and 2,200 are achievable in years 2017-2019. It takes time to build up momentum in housing construction and delivery There are potentially considerable improvements required to the roads and links to the town centre from the strategic allocations which impact on the deliverability of sites.
197/7	David	Keene	David Lock Associates / Gallagher Estates	Main	167			Gallagher Estates supports of the modifications to the housing trajectory and considers that the revised housing trajectory proposes reasonable assumptions on the likely first completions on land at Gavray Drive, reported as 50 units in 2016/17 with 125 completions in the following two years.		
206/12	Julia	Mountford	Boyer Planning / Redrow Homes and Wates Developments	Main	167					Would welcome confirmation that there is sufficient flexibility within the Housing Trajectory to ensure there is scope to bring forward Housing Delivery at South East Bicester at an earlier date than indicated.
217/6	Nick	Freer	David Lock Associates / Gallagher Estates and John Colegrave	Main	167			Support the housing trajectory and the reasonable assumptions on the likely first completions of land south of Salt Way - East. An outline application for up to 1,000 dwellings supported by an Environmental Statement has been prepared and will be submitted shortly. An early commencement of development is anticipated with delivery of some 100 units per year a		
233/3	Jonathon	Porter	Barton Wilmore / Archstone Projects Ltd	Main	167					There is a difference between the SHLAA and the Local Plan trajectory in terms of the rate of delivery at Upper Heyford.
233/4	Jonathon	Porter	Barton Wilmore / Archstone Projects Ltd	Main	167		The housing trajectory should be changed and more development assigned to the villages.			The housing trajectory is considered to be too optimistic
233/5	Jonathon	Porter	Barton Wilmore / Archstone Projects Ltd	Main	167					The Plan only provides for 4.55 years supply of housing at adoption and is unsound.

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251/15	Heather	Vickers	Planning Potential / Gleeson Developments Ltd	Main	167	Table 15 of the Plan is unrealistic and, specifically in relation to the first five years of the plan period, is considered undeliverable and therefore unable to meet the full objectively assessed need of the District. CDC has failed to provide a robust justification for the anticipated lead in times of the strategic sites and for the build out rates that are identified. Question whether it is appropriate to rely on the Council's estimated windfall developments.	This Table should be revised in relation to the points made at Section 3 below. Insert additional row for "Land North East of Crouch Hill Farm Adjoining Broughton Road, Banbury" with 117 units to be delivered within the first five years of the Plan period (50 in 16/17, 50 in 17/18 and 17 in 18/19).			
253/4	Michael	Lowndes	Turley / P3Eco Group	Main	167	Supports the principle of the increase in new homes at North West Bicester from 5,000 – 6,000. But the upper limit is arbitrary and the site is capable of delivering a greater number of homes. Not clear upon what evidence the figures have been founded. The North West Bicester Masterplan (May 2014) does not yet specify a phasing, implementation or delivery schedule which is subject to agreement with the P3Eco Group and all other interested parties. The SHLAA Update 2014 is based on A2Dominion's land interests only.	There should be no restriction on the amount of housing that can come forward during the Local Plan period at NW Bicester			
301/89	Bev	Hindle	Oxfordshire County Council	Main	168	Section E: Monitoring & Delivery Table 16 Figures for Banbury 6 and Banbury 15 are inconsistent with mod no. 2 (Table 1 Strategic Employment Sites).	It is our understanding that Banbury 6 should read "35 hectares" and that Banbury 15 should read "49 hectares".			
251/16	Heather	Vickers	Planning Potential / Gleeson Developments Ltd	Main	169	The Green Buffers and Settlement Boundaries have not been approached in a consistent way (Key Policies Maps) The policy basis is not justified by the Council's evidence base.	The Key Policies Maps need to be reviewed and the settlement boundary redrawn to take account of committed and strategic sites, and the Green Buffer fully reviewed in relation to a robust evidence base which justifies the requirement for this element of the Plan.			
210/5	Adrian	Gould	JPPC / Bicester Heritage Ltd	Main	170	It is considered that the increased allocation of employment land at North East Bicester has not been justified in that due regard has not been given to the potential to allocate a proportion of the additional employment land to the former RAF Bicester, where land for such purposes is both suitable and available.	The Technical Site and Flying Field should be allocated as a strategic employment site which is suitable for meeting some of the increased demand for B1 and B8 purposes that has been identified for this area of Bicester.		No comment	
251/17	Heather	Vickers	Planning Potential / Gleeson Developments Ltd	Main	170	The Green Buffers and Settlement Boundaries have not been approached in a consistent way (Key Policies Maps) The policy basis is not justified by the Council's evidence base.	The Key Policies Maps need to be reviewed and the settlement boundary redrawn to take account of committed and strategic sites, and the Green Buffer fully reviewed in relation to a robust evidence base which justifies the requirement for this element of the Plan.			
251/18	Heather	Vickers	Planning Potential / Gleeson Developments Ltd	Main	171	The Green Buffers and Settlement Boundaries have not been approached in a consistent way (Key Policies Maps) The policy basis is not justified by the Council's evidence base.	The Key Policies Maps need to be reviewed and the settlement boundary redrawn to take account of committed and strategic sites, and the Green Buffer fully reviewed in relation to a robust evidence base which justifies the requirement for this element of the Plan.			
097/14	Sue	Mackrell	Bicester Town Council	Main	174	The creation of an Eastern perimeter road around Graven Hill is essential to ensure the smooth movement of traffic around the town. The preferred option is to locate the road to the South East.				
097/15	Sue	Mackrell	Bicester Town Council	Main	175	Concern regarding connectivity from and to Bicester Town Centre, particularly the London Road access which is to be severely compromised by Network Rail developments and their impact on the level crossing. An alternative route needs to be agreed and provided at an earliest opportunity. Support improvements to Market Square, however, need to ensure no development takes place until connectivity to and from the Town Centre, including the London Road level crossing issue, has been resolved. Cycle and pedestrian routes need to be fully integrated offering users the opportunity to access all parts of the town easily and safely.				
116/5	Jack	Moeran	Environment Agency	Main	175		A new bullet point is needed for identifying and considering sites: "Whether the development would have an adverse impact on flood risk."		No comment	

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248/2	Richard	Cutler	Bloombridge	Minor	176	The Proposal Map for Bicester 10 does not correspond to the plan we submitted in our June 2014 Statement of Common Ground. Crucially, it misses out part of the frontage land that we hold under our control. This seems to be a drafting error. Clearly it is important to have the ability to develop the frontage in the most efficient way, with the objective of creating a high quality gateway to Bicester.	See plan provided.			
210/6	Adrian	Gould	JPPC / Bicester Heritage Ltd	Main	177	It is considered that the increased allocation of employment land at North East Bicester has not been justified in that due regard has not been given to the potential to allocate a proportion of the additional employment land to the former RAF Bicester, where land for such purposes is both suitable and available.	The Technical Site and Flying Field should be allocated as a strategic employment site which is suitable for meeting some of the increased demand for B1 and B8 purposes that has been identified for this area of Bicester.		No comment	
101/2	Sarah	Turner		Main	178	The extension to the Bicester 12 (South East Bicester) site comes unacceptably close to the village of Launton. Elsewhere in the Plan the importance of non-coalescence and visual impact is mentioned, so it should apply to here too. The railway line will not provide sufficient visual separation between Launton and the proposed new development. Launton is in danger of being engulfed by Bicester and steps should be taken to avoid this and preserve the character and rural setting of the village.	The Bicester 12 site should be reduced such that it does not come anything like as close to Launton. The green buffer to the south of Launton should be extended along the line of the railway line to the south east of where it currently stops (and at least as far as any proposed development at SE Bicester). The green buffer should also be extended on the southern side of the railway line (from the perimeter road along the line of the railway) to protect the gap between Launton and any new development and to prevent harm to the character and rural setting of Launton.			
244/7	Simon	Turner	Launton Parish Council	Main	178	The extension of the Bicester 12 boundary right up to the railway line at the north of the site, bringing mixed residential and business development right up to the south of Launton will lead to coalescence. Commercial development is likely to be sited closest to the railway line with its light and noise pollution affecting Launton. The existing green buffer for the village is woefully inadequate. Changes have now been made to the north (modification 181), but no changes were made to the southern buffer. The relatively modest railway embankment will not be adequate to create a separation and avoid coalescence and the greatly enlarged Bicester 12 makes the prospect of coalescence a near-certainty. There would only be a tiny gap separating Launton and the enlarged development at Bicester 12 – around half the existing 200 metre separation acknowledged to be "very narrow" in the Green Buffers Report.	The boundary of the green buffer to the south of Launton should: 1. Enclose the fields south of the railway line to the SW of the village, bounded by the ring road and the parish boundary between Launton and Ambrosden CPs, as suggested in Launton PC's response to the 2013 consultation; 2. Failing that, include the land north and north-east of the Launton side of the currently proposed buffer, up to the existing built envelope of the village, to prevent the village encroaching any further south towards the enlarged Bicester 12.			
197/8	David	Keene	David Lock Associates / Gallagher Estates	Main	180	The Gavray Drive site is shown with the River Ray Conservation Target Area (RRCTA) across part of the site. The RRCTA is an "alluvial floodplain". The yellow hatching on the Proposal Map amended shows a wider area for the fluvial floodplain than is actually the case. The boundary should be removed. The aims of the RRCTA are adequately dealt with under Policy ESD 11 Conservation Target Areas.	The River Ray Conservation Target Area (RRCTA) boundary should be removed from the Proposals Map.			
292/1	Nicholas	Cotter		Main	180					The proposals map identifies most of the eastern section of Langford Brook as a Conservation Target Area (CTA) and identifies the same area of land as a strategic housing allocation. This is a severe conflict and is therefore unsound. It also fails to identify the extent of the River Ray Conservation Target area which extends to the Gavray Drive Meadows
101/3	Sarah	Turner		Main	181			Supports the extension of the green buffer between Launton and Bicester north of the railway line, as this is essential to preserve the character and rural setting of the village of Launton.		
244/8	Simon	Turner	Launton Parish Council	Main	181			The extension of the green buffer to the north-west of Launton means that Launton should now be adequately protected from the threat of coalescence with the Bicester 11 development, and is greatly to be welcomed.		

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164/2	Sarah	Smith	Rapleys LLP / Pandora Trading Ltd	Main	187	Objection is raised to the identification of the land within the Hanwell Green Buffer and the consequential redrawing of the Banbury 2 allocation boundaries on the west of Southam Road. There is no rationale to reducing the site area of Banbury 2 west of Southam Road, limiting development to the south-eastern corner and designating the remainder of the land as green buffer - no evidence has been produced to substantiate these changes; The changes are not informed by a clear and robust evidence base and as such, the changes in respect of Banbury 2 are arbitrary and inconsistent with the material in the evidence base; The inclusion of the land within the Banbury 2 allocation would accord with the principles of sustainability and the spatial vision of the Local Plan; The Banbury 2 policy allocation should be restored to that in the Proposed Submission Local Plan of August 2012 – site area and boundaries increased to 43ha, the removal of the green buffer designation and the housing yield increased to 800 units.	should be amended to remove the green buffer notation from the site, and the limits to the urban area should be redrawn, thus extending the BAN2 allocation, as per the Submission Draft Local Plan, August 2012.		Not in relation to these particular modifications. Comments in respect of the Sustainability Appraisal are submitted under a separate representation.	Objection is raised to the identification of the land within the Hanwell Green Buffer and the consequential redrawing of the Banbury 2 allocation boundaries on the west of Southam Road .
301/88	Bev	Hindle	Oxfordshire County Council	Main	189	Section E: Monitoring & Delivery The County Council considers that it may be necessary to conduct an early review of the plan in response to emerging infrastructure needs. At such time that the Council is able to determine the scale and timing of needed infrastructure, the Council seeks to retain the flexibility of an early review to meet such needs if appropriate. OCC would request that this flexibility and agreement to a possible early review or other amendments as it pertains to infrastructure to be incorporated in section E of the plan (Monitoring and Delivery of the Local Plan). Given the expected further development of infrastructure requirements for the plan, the County Council would like to see Paragraph E.25 strengthened and positioned as a key part of the monitoring section, with specific reference to infrastructure requirements.	At E.2 add a bullet point to “assess whether sufficient infrastructure is in place” insert wording to this effect which includes ‘infrastructure requirements’.			
164/12	Sarah	Smith	Rapleys LLP / Pandora Trading Ltd	Main	197	Through the allocation of Banbury 16,17 and 18 and their removal from the green buffer it is clear that: 1. Areas of attractive countryside which form the setting to Banbury (as evidenced in Inquiry Core Document ENV03) are now proposed for development; 2. Ridgelines containing the town (as evidenced in ENV03) are now proposed to be breached by development, notably Banbury 18; 3. Areas which fulfilled the green buffer criteria (evidenced in ENV04) are now proposed for development despite the adverse impacts on setting and coalescence; 4. There is a lack of consistency and transparency in the approach which has been taken. For example, Banbury 16 and Banbury 17 would reduce the gap between Banbury and Bodicote to 200m, whereas the extension of the green buffer over Banbury 2 would result in a separation of over 1,000m between Banbury and Hanwell; 5. The green buffer evidence base has clearly been set aside; 6. CDC has been very selective in terms of its use of and reliance on all of the landscape related evidence base.	The allocations of Banbury 16,17,and 18 should be deleted and the green buffer designation should be re-instated across their extent.		Not in respect of these stated modifications. Comments are provided on the Sustainability Appraisal in a separate representation.	Concerns over the sustainability and, importantly, the deliverability of Banbury 16, 17 and 18 raises serious questions about the robustness of the allocation of these particular sites.
235/10	Simon	Gamage	RPS / Mr Bratt	Main	197					Supports the removal of the land at Bodicote from the Green Buffer.
179/67	Matthew	Bates	Oxford City Council	Main	201	The monitoring framework does not include a mechanism for monitoring progress on addressing the wider HMA housing need.	The Plan should include an additional row in the table in Appendix 6 with indicators and targets commensurate with the early Plan review trigger mechanism.			
179/68	Matthew	Bates	Oxford City Council	Main	202	The monitoring framework does not include a mechanism for monitoring progress on addressing the wider HMA housing need	The Plan should include an additional row in the table in Appendix 6 with indicators and targets commensurate with the early Plan review trigger mechanism			
179/69	Matthew	Bates	Oxford City Council	Main	203	The monitoring framework does not include a mechanism for monitoring progress on addressing the wider HMA housing need.	The Plan should include an additional row in the table in Appendix 6 with indicators and targets commensurate with the early Plan review trigger mechanism.			

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310/2	Victoria	Walton		Main	204	The map used to demonstrate the area is incorrect when taking into account the new railway expansion.. This results in the assumption of increased "habitats in active CTAs in the district" being incorrect (modification 204 of appendix 6). Indeed, with the proposals affecting both Bicester 12 and 13, the habitats will diminish.				
179/70	Matthew	Bates	Oxford City Council	Main	204	The monitoring framework does not include a mechanism for monitoring progress on addressing the wider HMA housing need.	The Plan should include an additional row in the table in Appendix 6 with indicators and targets commensurate with the early Plan review trigger mechanism.			
179/71	Matthew	Bates	Oxford City Council	Main	205	The monitoring framework does not include a mechanism for monitoring progress on addressing the wider HMA housing need	The Plan should include an additional row in the table in Appendix 6 with indicators and targets commensurate with the early Plan review trigger mechanism			
179/72	Matthew	Bates	Oxford City Council	Main	206	The monitoring framework does not include a mechanism for monitoring progress on addressing the wider HMA housing need	The Plan should include an additional row in the table in Appendix 6 with indicators and targets commensurate with the early Plan review trigger mechanism			
179/73	Matthew	Bates	Oxford City Council	Main	207	The monitoring framework does not include a mechanism for monitoring progress on addressing the wider HMA housing need	The Plan should include an additional row in the table in Appendix 6 with indicators and targets commensurate with the early Plan review trigger mechanism			
179/74	Matthew	Bates	Oxford City Council	Main	208	The monitoring framework does not include a mechanism for monitoring progress on addressing the wider HMA housing need	The Plan should include an additional row in the table in Appendix 6 with indicators and targets commensurate with the early Plan review trigger mechanism			
179/75	Matthew	Bates	Oxford City Council	Main	209	The monitoring framework does not include a mechanism for monitoring progress on addressing the wider HMA housing need	The Plan should include an additional row in the table in Appendix 6 with indicators and targets commensurate with the early Plan review trigger mechanism			
179/76	Matthew	Bates	Oxford City Council	Main	210	The monitoring framework does not include a mechanism for monitoring progress on addressing the wider HMA housing need	The Plan should include an additional row in the table in Appendix 6 with indicators and targets commensurate with the early Plan review trigger mechanism			
179/77	Matthew	Bates	Oxford City Council	Main	211	The monitoring framework does not include a mechanism for monitoring progress on addressing the wider HMA housing need	The Plan should include an additional row in the table in Appendix 6 with indicators and targets commensurate with the early Plan review trigger mechanism			
166/33	Helen	Marshall	CPRE Oxfordshire	Main	212	CPRE Oxfordshire considers these modifications to be unsound as they are based on the deeply flawed and unjustified Oxfordshire Strategic Housing Market Assessment 2014 (SHMA) and are not consistent with national policy.	Any development allocated to Gavray Drive is restricted to the land west of Langford Brook.			Gavray Drive - There is a severe conflict of interest in trying to bring Gavray Drive in as a new Strategic Housing Site when the majority of it lies within the Conservation Target Area of the Ray valley, containing as it does a rich local wildlife habitat. Whereas we agree to the proposed development west of Langford Brook, where the majority of the targeted 300 dwellings could be accommodated, we cannot agree that the "Key Site Specific Design and Place Shaping Principles" listed will provide adequate safeguards to comply with the requirements of policy ESD111 to prevent adverse impact on the CTA, let alone securing a net biodiversity gain as envisaged under NPPF policy 109. What does unnecessarily cramming a few extra houses down the eastern edge of the site, so blocking off the Gavray Local Wildlife Site from the rest of the CTA, achieve? As it is this historic site has been already 'shaved' by the construction of the new railway "chord".

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151/10	Jan	Molyneux	Stephen Bowley Planning Consultancy / Shipton Ltd	Main	220	There are need at Kidlington and North Oxford	The proposals map should include the potential for significant re-development at Shipton on Cherwell			
243/17	Alex	Wilson	Barton Willmore / A2 Dominion South	Main	222	The Modifications also make reference to "changes and improvements to Howes Lane and Lords Lane to facilitate integration of new development within the town". This is incorrect. This Strategic Infrastructure Scheme should be referred to as the new A4095 NW Strategic Link Road in the Local Plan. Improvements to this strategic link road are required to meet any planned growth in Bicester, independent or regardless of any development at NWB as evidenced by modelling undertaken by White Young Green on behalf of the Council.	"Changes and improvements to Howes Lane and Lords Lane to facilitate integration of new development within the town" should be referred to as the new A4095 NW Strategic Link Road in the Local Plan (required to meet any planned growth in Bicester)			
243/18	Alex	Wilson	Barton Willmore / A2 Dominion South	Main	222	The IDP does not include the new A4095 NW Strategic Link Road. This should be incorporated into the IDP. A new A4095 NW Strategic Link Road for Bicester is required to address the traffic movement and highways constraints issues which have long been an issue for the town and are required to meet any planned growth at Bicester, regardless of whether development proceeds at NWB.	The IDP does not include the new A4095 NW Strategic Link Road. This should be incorporated into the IDP.			
301/13	Bev	Hindle	Oxfordshire County Council	Main	222					The County Council would also request amendments to the wording of Policy INF1 reflecting the agreement for a review of the plan to accommodate future infrastructure needs, if it is determined to be necessary.
301/90	Bev	Hindle	Oxfordshire County Council	Main	222	Both Alkerton and Ardley household waste recycling facilities (HWRCs) serving Cherwell, experience capacity issues particularly at peak times. In order to keep pace with the level of development, contributions will be sought towards increasing capacity for re-use, recycling and composting at these sites or at alternative locations which would be determined by the review of the HWRC strategy in due course. Maintaining and increasing high rates of recycling and composting in Oxfordshire which are currently the best in the country is a key objective of the Oxfordshire Joint Municipal Waste Management Strategy. This also seeks to ensure that recycling facilities and services are available to all residents.	At present, the IDP does not appear to refer to new development for waste management infrastructure other than banks for glass and other materials provided by the district council. This should be rectified and appropriate wording included.			
301/91	Bev	Hindle	Oxfordshire County Council	Main	222	Add new line to reflect the need to enhance highways depot facilities to serve the needs of the district as a consequence of additional highway infrastructure. This is generic across the district and could include reconfiguration of the Deddington facility. Costs TBC.	Remove under cost column: "c.£556k" as this is subject to change			
301/92	Bev	Hindle	Oxfordshire County Council	Main	222	Bicester Line 56 (Adult Learning Service within Bicester Town Centre Redevelopment)	Remove under cost column: " c.£556k " as this is subject to change			
301/93	Bev	Hindle	Oxfordshire County Council	Main	222	Bicester Line 58 (Expansion of Registration Service , The Garth)	Under BICESTER Projects column, remove " The Garth "			
301/47	Bev	Hindle	Oxfordshire County Council	Main	222	Banbury Line 47 (Library relocation)	Remove under cost column: " c.£12.75m " and insert " <u>c. £4.5m</u> "			
301/49	Bev	Hindle	Oxfordshire County Council	Main	222	Banbury Line 52 (Early Intervention Hub expansion - Spiceball Development Area)	Remove line as already secured			
301/48	Bev	Hindle	Oxfordshire County Council	Main	222	Banbury Line 53 (Registration Service - Bodicote House)	Remove line as already secured			
301/46	Bev	Hindle	Oxfordshire County Council	Main	222	Kidlington and Rural Line 26 (Fire Service)	Remove			
301/45	Bev	Hindle	Oxfordshire County Council	Main	222	Kidlington and Rural Line 26 (Fire Service)				
301/44	Bev	Hindle	Oxfordshire County Council	Main	222	Library Provision	Insert new line to include dedicated library provision of 80m2 within new community hub at Upper Heyford; Costs c. £500k			

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179/78	Matthew	Bates	Oxford City Council	Minor	227	The now-revoked South East Plan can no longer be used as justification for resisting strategic review of the Oxford Green Belt. The unmet need from Oxford should also be referenced here.	Amend this paragraph to read as below: 1.22c Nevertheless, many of the conclusions arising from the process of producing the South East Plan remain valid. The level of growth envisaged by the South East Plan (670 dwellings per annum) is broadly in line with household projections for the District. The priority for growth is at Bicester where there remains a need to maximise the benefits accruing from its location, including for high value and knowledge-based business; the Green Belt north of Oxford needs to be maintained. Banbury is a Primary Regional Centre with an important role as a market town supporting its wider hinterland; and, there is a need to meet the local needs of our rural communities for small scale affordable housing, business and service development having regard to the changes to the rural economy and the need to maintain services. <u>There is also a requirement to meet a proportion of Oxford City's unmet housing need.</u>			
151/11	Jan	Molyneux	Stephen Bowley Planning Consultancy / Shipton Ltd	Main	276	There are need at Kidlington and North Oxford	The allocation of significant development, potentially within the Green Belt			
081/1	Roger	Wise		Minor	293			The modification updates the means as to how and when provision for open space, sport and recreation will be taken forward. The respondent agrees that further work should be carried out as part of the Local Plan Part 2.		This relates to Bicester 7 in particular
081/2	Roger	Wise		Minor	294			The modification updates the means as to how and when provision for open space, sport and recreation will be taken forward. The respondent agrees that further work should be carried out as part of the Local Plan Part 2.		This relates to Bicester 7 in particular
179/79	Matthew	Bates	Oxford City Council	Minor	318	Para E.20 - Change required to reflect the importance of meeting the full OAN, including that arising in Oxford that cannot be met within the City administrative boundary.	Amend para' E.20 as follows: We will continue to work with neighbouring authorities and other organisations on cross boundary issues through the Oxfordshire Spatial Planning and Infrastructure Partnership, the Buckinghamshire Duty to Cooperate Forum and the two Local Enterprise Partnerships covering the District, amongst others. The Statement of Compliance with the Duty to Cooperate shows joint working undertaken during the preparation of the Local Plan, and details the various forums and organisations we work with on a regular basis to debate and coordinate strategic planning issues. Actions resulting from cooperation with other local planning authorities or organisations will be reported in the monitoring report. <u>The Annual Monitoring Report will also report progress on cross-boundary planning to meet the full objectively assessed need (OAN) for the housing market area of Oxfordshire, and resultant early review of this Plan. The OAN includes the unmet housing need in Oxford that cannot be met within the City's administrative boundary.</u>			
161/27	Martin	Small	English Heritage	Minor	334					English Heritage welcomes the addition of the Former RAF Upper Heyford Landscape Sensitivity and Capacity Assessment (August 2014) to Appendix 3.
137/18	Theresa	Goss	Adderbury Parish Council	Main Appendix B	30c	Where Neighbourhood Plans are being pursued it should be addressed within the Plan.				

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313/2	Charles	Routh	Natural England	Main	71, 74, 77, 84, 87, 88, 101, 106, 115, 118, 120, 122, 157	A number of development specifications require that "A Landscape and Visual Impact Assessment, as well as a heritage assessment, should be undertaken as part of development proposals". This is unsound as it stands, because to be effective, this assessment should inform the design. Related to this, a number of development specifications require that structural landscaping scheme should inform the design principles for the site. The Landscape and Visual Impact Assessment should inform both. Consequent amendments should be made.	We advise to be effective the policy should read: "A Landscape and Visual Impact Assessment, as well as a heritage assessment, should be undertaken as part of development proposals <u>and</u> inform the design principles for the site".			
137/17	Theresa	Goss	Adderbury Parish Council	Main Appendix B	7b	Improving the Oxford to Banbury bus service- the service through Adderbury has had to be re-routed from West Adderbury onto the A4260 due to congestion, bypassing several stops. The frequency, time occurrence and possible technical solutions need investigating.				
179/1	Matthew	Bates	Oxford City Council	Main	Multiple	Relates to Main Mods 3-10 & 66-163: The major changes to the Plan and the evidence have been prepared in a short period. It is difficult to see how public and stakeholder views have been meaningfully tested. The City Council is not aware that there has been any Duty to Cooperate involvement of other district local authorities (excepting one meeting with the City Council that was initiated by ourselves, and from which there is no recorded outcome). The Sustainability Appraisal Addendum submitted in support of the changed strategy is also 'light-touch' in its approach considering the scale of change proposed. The Plan cannot be concluded as the most appropriate strategy when considered against the reasonable alternatives, nor based on a proportionate, adequate and up to date evidence base. Neither can it be considered demonstrably deliverable.				
179/2	Matthew	Bates	Oxford City Council	Main	Multiple	The proposed housing trajectory for Bicester and Banbury are undeliverable, it would not be possible to deliver 5 year housing supply, Significant under delivery against the target would have further repercussions for neighbouring local authorities, There is also inadequate evidence of existing and planned infrastructure to support the increased level of housing, additional mitigation measures are not currently identified in the Infrastructure Delivery Plan, plans to be flexible enough to adapt to changing circumstances, i.e. to include contingency measures,	Notwithstanding that the Plan is unsound, should the Plan progress it will be necessary to make substantial changes to various parts of the Plan. In particular it is necessary to include a new Policy PSD2 within the section 'A Strategy for Development in Cherwell', which provides a clear and appropriate mechanism for undertaking an early Plan review. Policy BCS1 and supporting text should also include much stronger reference to the need for an early Plan review, to include a strategic Green Belt review, in order to ensure delivery of both Cherwell's own Objectively Assessed Housing Need, and further address the unmet needs of the Housing Market Area including Oxford's unmet need (detailed suggestions provided).			
109	Brian	Yoxall		N/A	None					There is a strong consensus for retaining the present special character of Woodstock. That means: a) not diluting the quality of our heritage of historic buildings by too much modern, suburban sprawl; b) by not filling too many of our attractive green spaces; c) by encouraging the viability of our many fine places to wine and dine; d) by promoting the creation of cultural events which attract people from far and wide because of the appeal of the settings. Blenheim has a crucial role to play in all this but not by pillage of the lovely countryside which will spoil not only the special character of Woodstock but also blur the identity of Woodstock as a small, historic town and that of Bladon as a neighbouring but physically separate village. The Council's proposals are incompatible with the vision for Woodstock. Recently there were celebrations for 900 years of Woodstock history starting with the enclosure of the Royal Park. It would be ironic if Blenheim was to be the instrument whereby that wonderful legacy was to be undermined.

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122	Tracey	Charlesworth	Blackthorn Parish Council	N/A	None					Blackthorn Parish Council would support limited use of the land in accordance with the current community; would like an opportunity to have an input into the design, numbers and types of dwellings; would like to see the rural landscape maintained to include small holding/s with agricultural ties; raise concerns about an already dysfunctional sewage system, any additional housing would require the system to be redesigned; vehicular site access is critical; during wet weather the play area adjacent to the field suffers from significant flooding; there is a very limited bus service in the village which would necessitate cars for travel; there are limited amenities in the village. Photos of flooding enclosed.
141	James and Kate	Hamilton		N/A	None					Objection raised on the forecasts of housing need from the 2014 SHMA. The SHMA's methodology at arriving at the figures is questionable. The Parish Council and Cherwell District Council should question the SHMA, verify the figures and inform their constituents of the findings before acting on them. Concerned about the pressure that high levels of new housing would put on the area in general. Heavy traffic already in the area such as Evans Lane, Mill Street, The Moors, commuters from A34 to the airport and industrial estates. Development behind the Forge Garage has already caused traffic problems. Oxford needs to look long and hard at existing brownfield sites. Infilling in Kidlington is an issue. Landscape of the spire of St Mary's Church rising from its ancient meadows needs protecting.
215	Thomas	Forde	Kings Sutton Parish Council	N/A	None					No objections to the Plan however have concerns about the lack of consideration for the highway implications of the concentration of future development in Banbury on the south west side of the town. E.g. Salt Way, Canalside, Bankside. This will lead to significant additional traffic growth in the Oxford Road corridor in general and at the junction with Twyford Road in particular. Twyford Road is the access route to employment sites and traffic is an issue in the area. Motorists are now using Kings Sutton as a rat run to avoid delays between Banbury and A43.
097/12	Sue	Mackrell	Bicester Town Council	N/A	None	Concern that insufficient protection is given to nature reserves and wildlife sites.	Would like stronger policies for protection of flora and fauna in these vulnerable areas.			
097/16	Sue	Mackrell	Bicester Town Council	N/A	None					Bicester Town Council continues to be in support of the Plan apart from specific issues raised in this document and the previous ones, as long as the level of infrastructure provision serves to catch up with current deficits and keeps pace with housing numbers. In this instance, infrastructure includes all leisure and cultural provision, transport, education, health and employment.
108/1	R	Phipps		N/A	None					The traffic in Kidlington is already heavy and will increase with the use of the new railway station.
110/1	Martin and Pamela	Palmer		N/A	None					Most of the land around Webbs Way, Kidlington is in the Green Belt but also within the Kidlington Conservation Area. This was done for a good reason, and the retention of the character of the area, and some open spaces, is as important as it ever was. All of the land is a very important flood plain. There were previous flooding incidents in the area and Mill Street and development in this area would make the situation worse.
144/20	Theresa	Goss	Bloxham Parish Council	N/A	None					Have reservations that CRAITLUS 2009 is still underpinning policies. CRAITLUS is flawed and outdated, especially with reference to: the increase of traffic on the A361 extending the travel time to Banbury; the recent development on the Oxford Road has highlighted the need for accuracy in calculating traffic flow; and the lack of any monitoring of pollution on the A361 in Bloxham.

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144/21	Theresa	Goss	Bloxham Parish Council	N/A	None					The Housing Village Categorisation Update 2014 Addendum provided no evidence of a further robust examination of the current situation. It is based on a tick-box exercise showing services and not on availability. There is a serious shortfall in the number of doctors going into General Practice. Some GPs in Cherwell are already restricting their patient base. The revision of certain hospital provision at the Horton Hospital resulting in the increased number of journeys by local residents to facilities at the John Radcliffe Hospital in Oxford. The lack of village primary school places.
144/22	Theresa	Goss	Bloxham Parish Council	N/A	None					Bloxham has fulfilled its role to satisfy the NPPG requirements by the granting of permissions for 503 dwellings since 2006. Bloxham has been subject to a disproportionate distribution of housing that is now having, and will continue to have a detrimental impact on the real sustainability of the village. The SHMA causes concern as it has impacted adversely on many of the proposed modifications. The SHMA is still being questioned.
155/4	Peter	Bateman	Framptons Planning / Albion Land Ltd	N/A	None	The criterion requiring an assessment of agricultural land value does not serve a useful purpose	The criterion should be omitted			
159/1	Simon	Ruston	Ruston Planning Ltd	N/A	None	The sequential approach in BSC6, in addition to the modifications, is inconsistent with national policy and too stringent for the determination of planning applications	Removal of the sequential test from the policy would ensure that it is compliant with national policy, justified and sound			
159/2	Simon	Ruston	Ruston Planning Ltd	N/A	None	It is not a pre-requisite for there to be an identified need before the grant of permission				
159/3	Simon	Ruston	Ruston Planning Ltd	N/A	None	There is no requirement for Gypsy / Traveller sites to be within a specified distance of settlements	Removal of the sequential test for travelling distances to category A and Category B villages			
159/5	Simon	Ruston	Ruston Planning Ltd	N/A	None	It is only where developments are likely to generate significant numbers of movements where it should be ensured that a site should be located where the need to travel will be minimised. Proposals should only be prevented where the residual cumulative impacts of development are severe.				
159/6	Simon	Ruston	Ruston Planning Ltd	N/A	None	The district needs to supply more sites				
159/7	Simon	Ruston	Ruston Planning Ltd	N/A	None	Concerned that the needs assessment makes assumptions that are not robust and significantly underestimates the actual level of need. Particularly concerned about movement between sites and bricks and mortar accommodation, site turnover and the availability of specific sites.	The PPTS requires LPAS to use a robust evidence base			

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164/13	Sarah	Smith	Rapleys LLP / Pandora Trading Ltd	N/A	None	Objection is raised to the Sustainability Appraisal Addendum (SAA), principally on two grounds: (i) differences between site assessments in 2012/13 and 2014, and (ii) inconsistencies in assessment between the sites.			For SA objective 11 in relation to landscape and heritage the assessment scores in each case are - significant negative for Banbury 2 and minor negative for Banbury 16 and 17. Across all of the other criteria, the three sites have very similar scores. (Table 7.1 in the SA Non-Technical Summary, 2013). In the 2014 SSA, however, in respect of criteria 11 (landscape/heritage), Banbury 16 and 17 are now significant negative, whilst Banbury 2 remains significant negative (Table 2 of the SA Non-Technical Summary). In all other respects, the sites, again, have similar scores.....	
164/13	Sarah	Smith	Rapleys LLP / Pandora Trading Ltd	N/A	None	Objection is raised to the Sustainability Appraisal Addendum (SAA), principally on two grounds: (i) differences between site assessments in 2012/13 and 2014, and (ii) inconsistencies in assessment between the sites.			Cont.....It is, difficult to understand how the site assessments in relation to Banbury 16 and 17 can have changed in the space of a year, when there has been no change to the assessment methodology or to the environmental conditions actually on the ground. This questions the very accuracy of the SA and SAA and renders it unsound. Whilst it is accepted that a reduced site area for Banbury 16 and 17 may, similarly reduce/increase the development impact, it is difficult to comprehend the magnitude of the changes identified. Again, it is considered that this raises questions as to the accuracy of the SAA and, therefore, its soundness.	
186/3	Rob	Kinchin-Smith	Banbury Civic Society	N/A	None					Banbury is expected to grow by up to 33%in 15 years however the infrastructure will struggle to cope with this level of growth. There are only 2 crossing points, Hennef Way and Bridge Street. There is already traffic issues in the town and the planned growth will make this worse. There are options for providing alternative routes for 'through' traffic in order to relieve the town centre, particularly on the desire line between the M40 and the south and west sides of the town. Option 1 is a route between Ermont Way to Bankside/Oxford Road and Option 2 is between Tramway Road to Higham Way, Thorpe Mead and Chalker Way. Both options require a new bridge over the railway to the south of Banbury Station.
186/4	Rob	Kinchin-Smith	Banbury Civic Society	N/A	None		Emphasis on built, historic and natural environment should be unmissable as a key planning priority at every stage in the document; in the introductory strategy, the generic policies, the policies for all of the specific individual allocated sites that contain natural or heritage assets, and the policies on infrastructure.			The policies and supporting text on the natural environment occupy only 11 pages out of 266, whilst those on the built and historic environment, design and the Oxford Canal occupy a total of only 3 pages of 266.

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186/7	Rob	Kinchin-Smith	Banbury Civic Society	N/A	None		The 25th bullet point under Key site specific design and place shaping principles should be amended to read: " <u>Retention of historic buildings, including Grade II Listed Old Town Hall and Bridge over the river and locally listed buildings.</u> " The 5th bullet point under Additional requirements is confusing. Suggest removing " <u>and buildings</u> ". An additional requirement should be added to read: " <u>Because of the importance of Canalside's industrial heritage archaeological surveys, assessments and mitigation of impacts will be needed in specific locations and buildings.</u> "			Development at Banbury Canalside would need to allow for a south-to-east link road.
186/8	Rob	Kinchin-Smith	Banbury Civic Society	N/A	None					Development at Bankside would need to allow for a south-to-east link road.
200/1	Ronan	Leydon	Vale of White Horse District Council	N/A	None					Adding significant amounts of housing to meet the full objectively assessed need shown in the SHMA removes questions over reliance on RSS figures.
200/2	Ronan	Leydon	Vale of White Horse District Council	N/A	None					Vale of White Horse District Council to continue to work with Cherwell and other Oxfordshire authorities under the Duty to Cooperate. There is an established framework and process for the Oxfordshire authorities to work together to take forward Duty to Cooperate issues arising from the Oxfordshire SHMA and that this has been agreed by all Oxfordshire Council Leaders in the Statement of Cooperation. Oxfordshire Growth Board has recently taken over the work of the Strategic Planning and Infrastructure Partnership (SPIP) including leading on this important work.
200/3	Ronan	Leydon	Vale of White Horse District Council	N/A	None					Vale of White Horse District Council, Cherwell and other Oxfordshire authorities are proactively engaging with Oxford City Council to consider the issue of unmet need from Oxford. Oxford is currently preparing a SHLAA which will identify the scale of any unmet need from Oxford. Vale of White Horse consider pressure from Oxford City on Cherwell District Council and other rural Oxfordshire authorities to address the unmet needs of Oxford to be premature.
202/3	Jane	Hennell	The Canal & River Trust	N/A	None			IDP 57 - Under Main Delivery Partners, the Canal & River Trust is incorrectly titled. Remove the 's' in Rivers.		
206/13	Julia	Mountford	Boyer Planning / Redrow Homes and Wates Developments	N/A	None					The Local Plan Viability Update (October 2013) has the incorrect gross residential area for South East Bicester. It is referred to as 155ha which is the overall site area and includes the 40ha of employment. It is unclear what assumptions have been made in order to refer to a net area of 70ha of residential land. Clarification needed.
206/4	Julia	Mountford	Boyer Planning / Redrow Homes and Wates Developments	N/A	None					Policy BSC 3: The overall level of 30% affordable housing is broadly accepted, the reference to "the provision of extra case housing and the opportunity for community self-build affordable housing" requires further clarification.
243/19	Alex	Wilson	Barton Willmore / A2 Dominion South	N/A	None	The SA Addendum (p.45) incorrectly refers to NWB as being 390.2 hectares. The site comprises 406.5 hectares of land in total, including the Exemplar.	Amend SA Addendum			
243/20	Alex	Wilson	Barton Willmore / A2 Dominion South	N/A	None	The SA Addendum (p.105) summarises the impacts of the Submission Local Plan incorporating the Main Modifications in relation to NWB (Bicester 1). Here, consideration should be given the Eco-Town criteria as set out in Planning Policy Statement: Eco-Towns (2009), which have been carried forward in the NW Bicester Master Plan submitted to CDC.	Amend SA Addendum			

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243/21	Alex	Wilson	Barton Willmore / A2 Dominion South	N/A	None	The SA Addendum (Appendix 7, page 305) reviews how a development at NWB would create and sustain a vibrant community and engage cultural activity. Here the SA should consider the requirement (as set out in the Planning Policy Statement: Eco-Towns (2009) and submitted NW Bicester Master Plan) to deliver a governance structure which will engage communities.	Amend SA Addendum			
243/22	Alex	Wilson	Barton Willmore / A2 Dominion South	N/A	None	The SA Addendum (Appendix 7, page 307) considers improved efficiency in land use. In accordance with Planning Policy Statement: Eco-Towns (2009), NWB must demonstrate a net gain in local biodiversity and the requirements for green infrastructure. The Addendum should reflect this.	Amend SA Addendum			
243/23	Alex	Wilson	Barton Willmore / A2 Dominion South	N/A	None	The Council has published three studies undertaken on behalf of Sport England assessing the supply and demand for various forms of sports facilities over the plan period. The town wide infrastructure requirements should be addressed through the Town Wide Masterplan and any s106 requirements should be in conformity with the CIL regulations.	N/A			
251/1	Heather	Vickers	Planning Potential / Gleeson Developments Ltd	N/A	None	The Plan is unable to demonstrate a five year supply of deliverable sites. There should not be a need for an early review if sufficient sites are available.	Further allocations are needed.			
258/2	Craig	Barnes	Gladman Developments	N/A	None				No comment	Do not object to the sites allocated in the Plan but have concerns that the amount of development planned for, combined with deliverability assumptions made for large sites risk's the Plan's ultimate deliverability. The Plan should consider additional allocations to provide a buffer for the non-implementation of permissions or slippage in the expected delivery of allocations.
258/7	Craig	Barnes	Gladman Developments	N/A	None					The Council need to ensure that the Plan is deliverable. Do not consider annual delivery rates as outlines in the Housing Trajectory to be realistic. The annual yields and drawn out delivery rate applied for several major allocations including North West Bicester, Graven Hill, and RAF Upper Heyford, it risks the deliverability of the plan requirement and will serve to create land supply problems later in the plan period. There are various reasons that could affect the delivery of sites. The Council should allocate an additional 10% housing sites in addition to the residential housing requirement to provide a buffer to the housing requirement and provide some flexibility. Additional housing should be allocated towards the rural area of the district. The distribution of this growth should depend on the needs and capacity (including sustainable capacity) of each settlement. The absence of an up-to-date of needs in the rural area must be addressed as a priority by the Council.
299/2	Oliver	Taylor	Strutt & Parker	N/A	None		Site - Land north of Ardley with Fewcott. Consider safeguarding the site for a new Garden City.			Site - Land north of Ardley with Fewcott. The Council should be proactive rather than reactive to the potential issue spilling out of Oxford City. The Council should seek to identify, within the Local Plan, a suitable location for the delivery of a new Garden City and there is no reason why such provision could not be dealt with by way of a safeguarding style policy. The Plan could make clear that any safeguarded land is not allocated for development at the present time until Oxford City has concluded its capacity assessments. The merits of a new Garden City to the north of Ardley with Fewcott should be given detailed consideration. This site was submitted to the Council through the SHLAA Call for Sites in June 2014. The site was rejected in the SHLAA. A number of reasons as to why the site is suitable for development has been provided in the representation.

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300/1	Penny	Silverwood	Berks, Bucks and Oxon Wildlife Trust (BBOWT)	N/A	None					It is not clear whether preliminary ecological surveys have been carried out at extended and newly proposed development sites to inform whether allocation of these sites is appropriate in terms of biodiversity impacts. Lack of ecological survey may impact on the effectiveness of policies, since discovery of ecological constraints later in the planning process can severely affect deliverability.
313/1	Charles	Routh	Natural England	N/A	None					Policy ESD11 says "Development which would prevent the aims of a Conservation Target Area being achieved will not be permitted." Whilst not a matter of unsoundness, it would be helpful if it was set out where these aims could be found. These are currently on Oxfordshire County Council's website: https://www.oxfordshire.gov.uk/cms/sites/default/files/folder/s/documents/environmentandplanning/countryside/naturalenvironment/BAPnewsletterFINAL.pdf . Whilst ESD11 is not subject to a modification, policies Bicester 12 and 13 rely on ESD11, and thus we feel this matter falls within the scope of the consultation.
179/90	Matthew	Bates	Oxford City Council		SA	The Sustainability Appraisal has failed to consider at least one reasonable alternative (urban extension to the north of Oxford) and therefore does not comply with SEA Directive.				
179/91	Matthew	Bates	Oxford City Council		SA	The SA is referred to as "light touch" in terms of the scale of changes proposed (major changes to plan prepared within 11 week period) – it is also highlighted that public and stakeholders views have not had significant time to be tested.				
179/92	Matthew	Bates	Oxford City Council		SA	The SA is not impartial – wedded to pre-set policy position on part of Cherwell District Council (given that wider Green Belt review is dismissed on grounds that there are sufficient non –Green belt sites to meet additional need). There is no reasoning given for this position despite potential for significant challenge from other parties. Inspector's note that the "plan is likely to require an early review [of the Green belt] once the established process for considering the full strategic planning implications of the SHMA including any unmet needs in Oxford City has been fully considered jointly by all Oxfordshire Councils." Is referred to in support of this point. Justification for rejecting a Green belt review as a reasonable alternative is internally inconsistent, given that a Green Belt review to meet housing and employment needs is, in fact, included in the Plan and therefore assessed as a reasonable option in the SA.				
179/93	Matthew	Bates	Oxford City Council		SA	The SA assessed alternative limited to existing spatial framework – no alternatives have been considered outside of this. The scale of development proposed at Upper Heyford suggests that there is a need to consider other spatial options; to consider the potential impacts of other options on sustainability objective. Without undertaking this it is not possible to say that the most appropriate alternatives have been selected to meet additional need.				
179/94	Matthew	Bates	Oxford City Council		SA	SA notes that 'reasonableness' alternatives take into account the Plan objectives, geographical scope and national policy and concludes no blanket exclusion of Green Belt (in contrast to Flood Zone 3b). None of the 'reasonableness' criteria exclude a Green Belt review of area north of Oxford – rather some of the Plan's objectives would be supported by this spatial option.				
179/95	Matthew	Bates	Oxford City Council		SA	The conclusions of the SA Addendum compared to the original SA are very similar which is surprising given the magnitude of change proposed and likelihood of wide ranging impacts from this change – change refers to highest quantum of housing (1,140 dpa) – para 80 iii.				
001	Angela	Gemmill	Marine Management Organisation			No comment	No comment	No comment		

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003	Mark	Cherry	Local/County Councillors						No comment	
005	Simon	Harris	Brown & Co / Mr Mark Stroud	Minor		Site - Land at Waterworks Lane, Banbury is currently shown as existing green space on 5.3 Banbury Policies Map however the site should be allocated for employment use. The site lies outside of the flood plain and has industrial development on both sides of the site. Site plan attached.	Land at Waterworks Lane should be allocated for employment use. Site plan attached.		Site - Land at Waterworks Lane, Banbury is currently shown as existing green space on the Banbury Policies Map however the site should be allocated for employment use. The site lies outside of the flood plain and has industrial development on both sides of the site. Site plan attached.	
006	Andy	Winter							No comment	The Plan should be much more strategic about the housing needs of young people and young families. Section 106 provision should not be allocated into one cluster in a development or estate as this immediately stigmatises and creates division. The Plan need to find ways to support young people from the area and its villages to progress into the housing market without having to leave the area because of affordability. New models of working are needed for this and that the Plan provides an opportunity to develop these.
007	Andrew	Whitworth							No comment	Concern raised over the fact that much of Banbury is heavily congested at peak times, and time either side of them. The transport policy detailed in the Local Plan is vague and is built off old studies and predictions, that are just being carried forwards despite the housing plans continually expanding and growing. Several thousands new residents and their cars Banbury will grind to a halt. Explanation on mitigation measures is needed.
008	Donald	Robinson	Royal Pioneer Corps Angling Association (Bicester)						No comment	The original representation dated 3 September 2014 is withdrawn. The phrase 'low intensity recreational use' is not considered to be strong enough or specific enough and is open to misinterpretation depending on who you are. A new 10 year lease for the land and the lake to the north of Stratton Audley Quarry has been negotiated with the Oxfordshire County Council. The new lease has commenced on 5 March 2014.
009	Chris	Gaskell	Scottish and Southern Energy Power Distribution						No comment	Where existing infrastructure is inadequate to support the increased demands from the new development, the costs of any necessary upstream reinforcement requirement would normally be apportioned between developer and Distribution Network Operator in accordance with the current Statement of Charging Methodology agreed with the industry regulator (OFGEM). Maximum time-scales in these instances would not normally exceed around 2 years and should not therefore impeded delivery of any proposed housing development. To minimise costs, where possible, existing overhead lines can remain in place with uses such as open space, parking, garages or public highways generally being permitted in proximity to the overhead lines. Where this is not possible, then agreement will be needed as to how these will be dealt with, including agreeing costs and identifying suitable alternative routing for the circuits.....
009	Chris	Gaskell	Scottish and Southern Energy Power Distribution						No comment	Cont....The existing customer base should not be burdened by any costs arising from new development proposals. To ensure certainty of delivery of a development site, any anticipated relocation of existing overhead lines should be formally agreed with SSEPD, prior to submission of a planning application. The enclosed Appendix A includes additional information in respect of the areas detailed in the sites, where the overhead lines and/or significant number of dwellings proposed. Maps are also enclosed.

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011	David	Broadley	Aylesbury Vale District Council						No comment	The Proposed Modifications document does not identify any potential unmet needs arising from Cherwell, and understand that the Oxfordshire Spatial Planning and Infrastructure Partnership (SPIP) is a county wide agreement to plan for and manage Oxfordshire's growth within the county. This is welcomed and supported, both now and in the context of any future objectively assessed housing needs in the County. Aylesbury Vale District Council looks forward to working with Cherwell District Council, Oxfordshire County Council and Buckinghamshire County Council under the terms of the Memorandum of Understanding signed 2 June 2014 on Strategic Issues related to the A41 between Bicester and Aylesbury.
013	E	Forrest	Civil Aviation Authority						No comment	Other the consultation required by Section 110 of the Localism Act 2011, it is not necessary to consult the CAA about Strategic Planning Documents (e.g. Local Development Framework and Core Strategy documents) other than those with direct aviation involvement (e.g. Regional Renewable Energy Plans). Where a Plan might affect an airport, the airport operator is the appropriate consultee.
014	Andrew	Astin	Indigo Planning			This does not address inconsistencies created within some of the Local Plan's retail policies.			No comment	With the potential for the expansion of the town centre drafted within the Local Plan Part 2, this provides a window of opportunity for applicants to take advantage of the conflicting retail policies as currently proposed in the Plan. Para B.51 encourages growth in Bicester Town Centre noting that the town has retail capacity to expand towards the railway station. However, Para B.53 does not support development outside of town centre. Furthermore Para C.68 conflicts with B.51. The existing centre already faces both current and future pressures. These are likely to increase with the proposed town centre extension. Para C.65 addresses this. It is essential to the long term future of Bicester Town Centre and the Local Plan that policies remain consistent with each other and are compliant with national policy. It is strongly felt that the aforementioned conflicts within the Plan will have a negative impact towards attempts to reverse vacancy rates in the town centre. This in turn will have a negative effect on local occupiers. For this reason the expansion of the town centre needs careful consideration and should be constrained to areas surrounding the town centre.
019	Jane	Olds	Caversfield Parish Council						No comment	The Village Categorisation Update 2014 suggested that there were recreational facilities at Caversfield however this is incorrect as there are none in the area. The recreational facilities in the village are owned and managed by the MoD for use by the MoD and USAF families who live in the area. General members of the public are currently allowed to use the facilities but due to the nature of the site, the MoD reserves the right to close them at any time for any reason. Request for the Village Categorisation Update 2014 to be amended.
027	Helen	Gibbs	Laws & Fiennes							Site - Land north of Middleton Stoney and adjoining Ardley Road should be considered for small scale residential development. The site is 1.71ha and is suitable and achievable.
028	Helen	Gibbs								Site - Land west of Shutford off the Epwell Road should be considered for small scale residential development. The site is 1.93ha and is suitable and achievable.
031	Daphne	Hampson								No development should take place around St Mary's Church, Kidlington as this would take away a wonderful piece of open country around the river there, and views of an ancient church from the fields which has been like this for generations.

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154	Lucy	Murfett	South Oxfordshire District Council	Main						Adding in significant amounts of housing to meet the full objectively assessed need shown in the Strategic Housing Market Assessment (SHMA) removes questions over reliance on RSS figures. We will continue to work closely with Cherwell & other Oxon authorities under DTC to address larger than local issues. We confirm that there is a framework and a process for the Oxon authorities to work together to take forward DTC issues arising from the SHMA and that this has been agreed by all Oxon Council Leaders in the Statement of Cooperation. A new body, the Oxon Growth Board has recently taken over the work of the SPIP, including leading on this important work. Oxon authorities are engaging with Oxford City as they prepare their revised SHLAA. In meantime, we consider pressure from Oxford City on Cherwell and other rural Oxon authorities to address the unmet needs of Oxford to be premature. Would like to attend at Hearing session that covers the SHMA.
195	Sue	Bull	Anglian Water							No comment.
243	Alex	Wilson	Barton Willmore / A2 Dominion South			the Council has not taken the opportunity afforded by modifications to review the approach to policy and promote a more simplified and succinct policy that is flexible and achievable. There is excessive detail in Policy Bicester 1. Some matters would be more appropriately addressed through the SPD. District wide policies may not therefore fully reflect the ambitions of the eco-town or the requirements of the Supplement to PPS1. The development should also be compatible with the Bicester Masterplan	Propose the following alternative policy: North West Bicester Eco Town Development Area: Approximately 400 hectares Development Description: A new eco-development , in accordance we the the principles set out in the Supplement to PPS1 Eco Towns, Government Guidance and best practice will be developed on land at NW Bicester. The proposals for the site are be set out in a master plan. The master plan will be prepared in accordance with an agreed brief and will set out the principles for development. Each phase of development is to be in accordance with the master plan. Regard will also be paid to the Bicester Master Plan, prepared by White Young Green. The development shall provide for the strategic realignment of Howes Lane to assist in the delivery of the wider transport and access strategy for Bicester. The master plan will be the subject of consultation and engagement and the Council will seek to adopt the master plan as non statutory policy. Where there is a conflict or inconsistency between the other policies in this plan and the adopted master plan and supplement to PPS1, the master plan documents shall take precedence.			
250	Adrian	Shooter	Bicester Vision Partnership							Bicester Vision fully supports the draft Cherwell Local plan with its chapter specifically devoted to Bicester. Pleased to see that some of the concerns previously raised have been addressed. Welcome the recognition of Bicester's prime location as an economic hub and the evidence to support the allocated employment land. Would be interested to see what other sites could accommodate science and technology companies and different types of commercial space than presently available. Bicester is an ideal location for Oxford based companies. Strongly support the proposed improvements to motorway and railway linkages and welcome the recognition that Bicester is well placed between Oxford & Cambridge. Employment opportunities must be provided in tandem with house construction. Remain worried that the Local Plan might need to be more robust to shape Bicester's present and future employment and economic needs. Aware that the Local Plan Part 2 will provide opportunities for smaller sites. Would like to see more opportunities in Science, Technology and Research Facilities, which at present are only listed for the Bicester Gateway development and Heyford Park would be an ideal location.

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255	Claire	Berry	West Northamptonshire Joint Planning Unit							The JPU has no objections to the proposed modifications. It is aware that South Northamptonshire Council has raised concerns regarding the impact of additional growth at Bicester, Upper Heyford and Banbury on key trunk road junctions and the local rural road network in South Northamptonshire district. It would therefore ask that the JPU is kept informed of any discussions or communications between yourselves and South Northamptonshire Council regarding these matters.
257	Mr & Mrs	Blaine				Concerned about the proposals for Kidlington and the impact on the quality of life and green spaces. Kidlington should stay separate from Oxford. Object to building on Green Belt land. Green Belt is a permanent designation and Government guidance states that unmet housing need is not a reason for building in it. Kidlington's roads cannot take much more traffic and parking will be a problem. There will be an irreversible impact on the environment and the countryside. Public services may not cope.				
012/1	Carl	Smith	Gosford and Water Eaton Parish Council						No comment	It is welcomed that there is no proposal for the Green Belt, other than a small scale review. However there are concerns regarding Oxford City Council who are: 1) Pressing for a major review with the object of proposing more housing outside the city boundaries, where Oxford City Council has publicly indicated an interest in more houses on an area of green land in this Parish sandwiched between Bicester Road and A34. 2) Have an on-going Northern Gateway development consultation where there is an A40/A44 link road proposed in the Cherwell part of the Green Belt located in this Parish. This would lead to more traffic congestion, pollution and accidents and the likelihood of further unwanted development in the Green Belt.
012/2	Carl	Smith	Gosford and Water Eaton Parish Council						No comment	The increased number of homes proposed in the Plan raises concerns over the amount of generated traffic attracted to/from Oxford that will be caused through the Parish. Much of this traffic will affect the local highway network to create more congestion, pollution and accidents.
012/3	Carl	Smith	Gosford and Water Eaton Parish Council						No comment	The Environment Agency has informed the Parish Council that the flood defences at Banbury will have little, or no effect on flooding events in this Parish. As the Banbury flood defences have been designed for a 1 in 200 year flood event, whereas part of this Parish only has 1 in 100 year protection, or none at all, the Parish Council make a request that Community Infrastructure Levy is made available for improving and providing flood protection to flood risk property through this Parish.
012/4	Carl	Smith	Gosford and Water Eaton Parish Council						No comment	The Plan proposes 5,478 homes across Kidlington and rural areas. There is concern about the effect on infrastructure, traffic and Green Belt due to proposing 250 of these homes, or even more being built in the Kidlington area, where some may be included into this Parish under this planning arrangement.
015/1	Michael Catherine Timothy Les Lawrie	Waine Fulljames Hallchurch Sibley Stratford	Local/County Councillors						No comment	The Minor Modifications to the Plan are not minor for the town of Bicester and its immediate locality given the increase in number of extra houses to be built by 2031.

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015/2	Michael Catherine Timothy Les Lawrie	Waine Fulljames Hallchurch Sibley Stratford	Local/County Councillors						No comment	The community must have the necessary infrastructure not only to match the planned growth, but also to meet the backlog of previous years. Given the almost doubling of the size of Bicester to become Oxfordshire's second largest town it strongly believed that both Cherwell District Council and Oxfordshire County Council, and Government have a moral commitment to ensuring this happens.
015/3	Michael Catherine Timothy Les Lawrie	Waine Fulljames Hallchurch Sibley Stratford	Local/County Councillors						No comment	Extra new employment: Plans for bringing new employment opportunities to the town are already set out and agreed. The planned extra housing must carry with it a proportionate increase in the number of new jobs on agreed and new sites. Consider looking for a good range of jobs, across various skills and underline the need for the creation of 'higher earning' jobs that will encourage 'out commuters' to consider local alternatives. Storage and distribution units should be part of the Graven Hill development where they will be more in keeping with the built area already existing and the advantages of a 'railhead'.
015/4	Michael Catherine Timothy Les Lawrie	Waine Fulljames Hallchurch Sibley Stratford	Local/County Councillors						No comment	Connectivity with the town centre: Given the fact that any expansion of Bicester town centre is very constrained, access to it needs to be very carefully thought through and decisions need to be made having given regard to the whole picture, and not in a piecemeal way. The town is currently accessed by seven roads, four of which would be termed main roads - Oxford A41, London, Buckingham, and Banbury. The other three are roads are restrained - Launton Road; Bucknell Road; and Middleton Stoney Road. An alternative route to the London Road entry to Bicester needs to be provided as a matter of urgency given Network rail developments and their impact on the road crossing - traffic could well back-up into the Market Square and town centre. Decisions regarding 'problems' of clear access on the Bucknell, Launton, and Middleton Stoney Roads needs to be made to give easier and safe local access to the town centre, including bus routes. Pedestrian access along all main routes into the town need to be improved so as to encourage walking to the town centre, and other routes to be developed.....
015/4	Michael Catherine Timothy Les Lawrie	Waine Fulljames Hallchurch Sibley Stratford	Local/County Councillors						No comment	Cont....Designated safe cycle paths needs to be established to the town centre and amenities, not just registered as aspirational. There will need to be improvements to local bus networks to ensure those living on the outer edges of Bicester will not be reliant on cars to access the town centre.
015/5	Michael Catherine Timothy Les Lawrie	Waine Fulljames Hallchurch Sibley Stratford	Local/County Councillors						No comment	Eastern perimeter road: Given the decision that the eastern perimeter road should carry the larger part of traffic around Bicester it is vital that the route 'around' Graven Hill linking to the A41 at the Oxford Road is agreed as soon as possible. Our preferred route would be one which joins at the Vendee Drive roundabout.
015/6	Michael Catherine Timothy Les Lawrie	Waine Fulljames Hallchurch Sibley Stratford	Local/County Councillors						No comment	Western route: As stated in the previous consultation on NW Bicester we are very concerned about the proposal for the re-aligned Howes Lane to be 'urbanised'. We believe that a clear local western route round Southwold, Bure Park and the Eco development linking with Vendee Drive is essential. We ask that early decisions not be made on issues of speed, type of road, closeness of housing regarding the re-aligned Howes Lane.

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015/7	Michael Catherine Timothy Les Lawrie	Waine Fulljames Hallchurch Sibley Stratford	Local/County Councillors						No comment	School places: Assure that there will be a sufficiency of school places in Bicester given the major planned increase in population, pre-school/nursery, primary and secondary. New housing sites are planned, and others sites are being extended so it will help to see where new schools will be built (with capacity figures), and where current proposed or existing schools might be expanded, again with capacity figures. Thought will need to be given to extended further education opportunities with perhaps the expansion of the proposed Studio School to a UTC.
015/8	Michael Catherine Timothy Les Lawrie	Waine Fulljames Hallchurch Sibley Stratford	Local/County Councillors						No comment	Sports/playing field space: Space for sport is currently in deficit for Bicester and will need to be corrected within the Cherwell plans for growth. Large playing field areas are needed, not estate based small playground pockets, and these need to be designated at this early stage. A town of fifty thousand will need sporting facilities commensurate with its size and these facilities need to be properly planned for and not left as aspirational. The same goes for all leisure and community projects. Although not leisure the plan needs to be clear about a site for the much needed new burial ground.
015/9	Michael Catherine Timothy Les Lawrie	Waine Fulljames Hallchurch Sibley Stratford	Local/County Councillors						No comment	Health Issues: Bicester will need enhanced provision with additional doctor's surgeries and dentist clinics in appropriate designated locations to meet the needs of new communities. Everyone in the Bicester locality needs to have the assurance that sufficient beds will be available in the town for respite and dementia care.
026/1	Mike	Fenton	Hawkins Eades Planning						No comment	Site - Land east of Charbridge Lane should be considered for light industrial development (Class B1 Starter Units). There are two pieces of land shown on the attached plan. The triangular piece of land has an area of 1.05ha (approx.) and the rectangular shaped site some 0.93ha. The sites are well-defined on the ground and well screened by existing trees, hedges and other vegetation. There are existing accesses into the sites. It is logical for these sites to be used for light industrial purposes as they are located across from a large employment area on the other side of Charbridge Lane. They are some distance from the edge of Launton, but by definition Class B1 uses are compatible with residential areas. There is a need for sites for 'seedbed' or starter units for embryonic enterprises to get their foot on the ladder. The area is currently shown as green buffer land however the development of the two sites in the manner proposed will not materially harm this objective. There will still be significant land left to continue to act as a buffer, and indeed the development of these two sites will block to a degree any further development of this tranche of land. The proposed development would retain the field pattern and can offer an opportunity to repair and upgrade field boundaries.
026/2	Mike	Fenton	Hawkins Eades Planning						No comment	Site - Land north west of Bicester 12 should be considered for the inclusion of the Bicester 12 allocation. The site is approximately 5ha and is excluded from Bicester 12. It is bounded by the railway line to its north east and the A4421, Wretchwick Way on the south east of Bicester as well as by the defined limits of Bicester 12. The site has a number of different owners and interests. The site is currently shown as a Conservation Target Area. There is inconsistencies with the Bicester Landscape Sensitivity and Capacity Assessment (Aug 2014) where the site was analysed as part of Site 117 (extended Bicester 12). The study does not conclude that the site should be kept free for development as a result of landscape sensitivity.

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137/1	Theresa	Goss	Adderbury Parish Council			Whilst there is a duty to co-operate there is no duty to agree the SHMA, and there has been no examination of the housing need. There is inadequate protection of biodiversity and accessibility of natural green space for local people given the scale of development, the modifications do not align with strategic objectives 6,12,13,14 and 15, and Policy Banbury 12 would lead to coalescence and urbanisation of the village.				The Parish Council expresses disbelief at the consideration of sites from Twyford up to the edge of the M40 in the SHLAA, albeit on the rejected sites list. Reference is made to the recent appeal decision on land north of Adderbury Court.
140/1	Todd	Huffman					Encourage the Council to reject the SHMA document on the grounds that it is not comprehensible and to ask for a complete and careful re-write of the main body of the text as well as an attached executive summary.			The SHMA has no executive summary, repeats itself often, is written in impenetrable language, and does not express a point or an overview. There is no 'strategy' within the SHMA document.
232/3	Matthew	Hayes	GVA / Oxford Aviation Services							The policy explicitly resists housing within employment sites and therefore previous comments have not been addressed.
232/4	Matthew	Hayes	GVA / Oxford Aviation Services							Insert text to show how major developed sites in the Green Belt should be dealt with.
232/5	Matthew	Hayes	GVA / Oxford Aviation Services							Minor wording amendments to clarify that policy ESD14 establishes the policy basis for a review of the Green Belt around Oxford Airport
232/6	Matthew	Hayes	GVA / Oxford Aviation Services							Remove timescale constraints for Green Belt Review.
233/6	Jonathon	Porter	Barton Wilmore / Archstone Projects Ltd				The polices map should be amended to show within the settlement boundary a site at Springfield farm which has outline planning permission.			The polices map should be amended to show within the settlement boundary a site at Springfield farm which has outline planning permission.
235/1	Simon	Gamage	RPS / Mr Bratt							Supports the assessment of land at Cotefield Farm in the August 2014 SHLAA.
236/1	P A	Cox	Bicester Chamber of Commerce				Allocate more employment land.			The increase in employment land is not as significant as the increase in housing land in the Local Plan which means there will be fewer jobs created in relation to an increase in number of residents in Bicester. The Local Plan needs to better protect existing employment land. It does not address the issue of out-commuting at Bicester
236/10	P A	Cox	Bicester Chamber of Commerce							The current sports centre is too small for the population of the town and no mention of arts provision. 'Life style enhancing facilities' are not mentioned in the Local Plan.
236/11	P A	Cox	Bicester Chamber of Commerce							Questions the likely impact of growth if Oxford cannot accommodate its own needs.
236/12	P A	Cox	Bicester Chamber of Commerce							The Local Plan fails to take advantage of the fact that Bicester is unconstrained by historic commercial activity.
236/2	P A	Cox	Bicester Chamber of Commerce							There is more emphasis on mixed use sites for employment rather than just B1 jobs which is less aspirational. There is too much reliance on construction jobs. Bicester will become a major inter-change point and a good place for meeting which is not recognised in the Local Plan. The Local Plan lacks aspiration and Bicester should seek to be a motorsport and engineering hub.
236/3	P A	Cox	Bicester Chamber of Commerce				Land should be located close to junction 9, the A41 and A4421.			There will be an increase in traffic and freight movements. There is no complete ring road around the town which is a strategic shortfall and will threaten the prosperity of the town. The Local Plan needs to address infrastructure to a greater extent.
236/4	P A	Cox	Bicester Chamber of Commerce							The additional employment land identified to the east of the town, although welcome is poorly located.

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236/5	P A	Cox	Bicester Chamber of Commerce							The South West corner of North West Bicester for employment use may not be an acceptable and if it goes ahead the developer should fund highway improvements.
236/6	P A	Cox	Bicester Chamber of Commerce							There needs to be greater clarity and consistency between documents; the Bicester masterplan, NW Bicester masterplan.
236/7	P A	Cox	Bicester Chamber of Commerce							There is no mention of the delivery of infrastructure projects thorough the use of section 106 agreements. Wyvale garden centres expansion and added traffic needs to be resolved and contributions made.
236/8	P A	Cox	Bicester Chamber of Commerce							There should be control of growth of retail development outside the town centre.
236/9	P A	Cox	Bicester Chamber of Commerce							There should be more mention of the provision of cycle ways.
239/1	Andy	D'Arcy	South Northamptonshire Council							<p>This Plan was considered by the Council's Policy and Regeneration Strategy Committee on 17th September 2014</p> <p>South Northamptonshire Council (SNC) is grateful to Cherwell District Council (CDC) for giving it the opportunity to comment on the Plan.</p> <p>SNC notes the need for additional work undertaken by CDC to accommodate the higher levels of growth as required by the most recent SHMA.</p> <p>This Council raises no objections to the proposed main modifications but considers that the additional growth identified for Bicester and Upper Heyford will require careful consideration of traffic movements at key trunk road junctions and the local rural road network, particularly to the east of the proposed developments in South Northamptonshire District. In particular attention is drawn to:</p> <ul style="list-style-type: none"> • J10 of the M40 • The B4010 • Local routes from J9 of the M40 through and around Bicester to the A43
239/1	Andy	D'Arcy	South Northamptonshire Council							<p>Cont.....In respect of Banbury, SNC is also concerned at the effects of the additional development proposed for the town and the particular issue of traffic impact that this could bring to both key trunk road junctions and the rural local road network in South Northamptonshire District. Particular attention is drawn to:</p> <ul style="list-style-type: none"> • J11 of the M40 potential 'rat-running' through Middleton Cheney and along the Welsh Lane (B4525) to the A43 • Rural routes through Kings Sutton (Banbury lane, Green Lane and Charlton Road), Aynho (B4100 and B4031) and Farthinghoe (A422) <p>SNC requests regular meetings are held between the two LPA's and appropriate Highway Authorities as the Plan progresses, so that any adverse impacts can be mitigated as far as is possible and to consider ways that road connectivity from both Bicester and Banbury can be improved.</p>

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240/1	Tim and Lin	Wakeford				Objects to the proposal for a possible local review of the green belt boundary around Kidlington. The green belt around Kidlington has helped to keep the village separate from Oxford for many years. It is much appreciated and enjoyed by large numbers of local residents at all times of the year and this helps to give Kidlington a great sense of community which would be lost if the green belt were to be changed or removed. It is our understanding that the green belt is a permanent designation and that government guidance states that unmet housing need is not a reason for building in it.	Strongly object to Modification 62 and request it is deleted, together with all references to a green belt review around Kidlington to meet local housing need.			
253/5	Michael	Lowndes	Turley / P3Eco Group	Main					The increase in the rate of delivery is not reflected in the Masterplan and the Phasing and Implementation Plan is yet to be agreed by all parties. The reference to the developer's assessment is also unclear.	
184/5	John and Pamela	Roberts								The representor requests that Langford Community Orchard behind Alchester Terrace, Bicester, is designated a local green space in accordance with NPPF paragraphs 76 and 77. The land is situated between Footpath no. 5, cycle route 51 (which runs along one side) and the Claypits allotment site on the other. It is of great value to the local community.
274/1	Bob	Sutton	Brown and Co / Mr D Orchard	Main			Site-LAND SOUTH OF PATRICK HAUGH ROAD ARNCOTT: requests inclusion of this site (SHLAA site AN004) as an allocation for residential development in the Plan.			The submission confirms the availability of the site for development.
275/1	Bob	Sutton	Brown and Co / Exors of W J C Burrows	Main		The site would offer more housing to assist with maintaining a five year housing land supply and would enable a variety of house types, public open space, affordable housing and contributions to infrastructure.	Site- LAND AT LAUNTON INCLUDING FORMER SEWAGE TREATMENT PLANT AND LAND TO EITHER SIDE AND REAR: requests inclusion of this site (SHLAA site LA018 refers) as an allocation for residential development in the Plan.			The inclusion of the STW works and land to the north west is promoted although the representor's client has no control over the STW. The submission advocates inclusion of additional land either to the south east or rear. The site is well contained within long established boundaries and would not cause any visual intrusion into the landscape. Launton is a sustainable location for development with a good range of services.
276/1	Bob	Sutton	Brown and Co / Mr M R Stevens	Main			Site-LAND NORTH OF TWYFORD ROAD ADDERBURY: requests inclusion of this site (SHLAA site AD048 refers) as an allocation for residential development.			The representor considers other allocations in Adderbury are likely to be controversial and this site could be a suitable replacement, comprising a rounding off at this part of the village and having no impact on the landscape.
277/1	Bob	Sutton	Brown and Co / Mr D Orchard	Main			Site- LAND AT ARNCOTT HILL FARM, ARNCOTT: requests inclusion of this site (SHLAA site AN027 refers) as an allocation for residential development.			Reference is made to the findings of the SHLAA. Re-development of the part of the site occupied by farm buildings for approximately 17 houses is supported, but the area of land to the north east should also be included to provide further houses without being detrimental to the setting of Graven Hill.
295/1	R A	Sutton		Main			Allocate Builder's yard site east of the A44 , Woodstock Road East, Begbroke for housing development.			
297/1	Bob	Sutton	Brown and Co / Mr D Orchard	Main		Cherwell will need to maintain a five year housing land supply. Arncott is a sustainable location, and the site has development on two sides, is contained by roads and established boundaries, and could be developed without impact on other properties or landscape.	Site- LAND AT MURCOTT ROAD, ARNCOTT: Requests inclusion of this site (SHLAA AN019 refers) as an allocation for residential development in the Plan.			
163/5	John L	Broad								The representor requests that Langford Orchard by Alchester Terrace, Bicester and maintained by Grass Roots Bicester, is designated a local green space in accordance with NPPF paragraphs 76 and 77. The land is situated between Footpath no. 5, cycle route 51, Claypits allotment site and the ex-highways land. NPPF paragraphs 76 and 77 indicate local communities should identify for special protection green areas of particular importance to them and that this should be done when a local plan is being prepared or reviewed.

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313/6	Charles	Routh	Natural England						We have no comments to make with respect to the Sustainability Appraisal.	
313/7	Charles	Routh	Natural England							Natural England concurs with the conclusion of the Habitats Regulations Assessment. This states that the HRA Stage 1 (Screening) has identified that none of the 76 policies (or the proposals therein) present in the Cherwell District Council Submission Cherwell Local Plan incorporating Proposed Modifications (August 2014) will lead to likely significant effects on Oxford Meadows SAC, alone or in combination with other plans and projects.
065/1	R.D (Mr and Mrs)	Brodie				Objects to the proposal for a possible local review of the Green Belt boundary around Kidlington. They believe that they would lose their privacy and the openness of the land behind their home. The Green Belt around Kidlington has helped to keep the village separate from Oxford and has pleasant and unspoilt countryside with many well-used footpaths and green spaces which is much appreciated and enjoyed by large numbers of local residents. Any new housing built on Green Belt Land cannot, therefore be limited to meeting "local need" as the plan suggests, but will be used to meet the vastly inflated housing requirement as assessed by the SHMA. The Green Belt is a permanent designation and Government guidance states unmet housing need is not a reason for building in the Green Belt. Once started it will then become a regular excuse to build more and more.	The Local Plan is unsound and modification 62 is deleted together with all references to a Green Belt Review around Kidlington to meet local housing need.			
067	Darryl and Dianne	Bates-Brownswor d				Reference is made to a planning application (07/01718/F) for a housing development to be built on the land north east of Gosford Farm, Bicester Road, Gosford and the frequent flooding which occurs in the fields in this area. Development will lead to property damage, human stress and exorbitant property insurance premiums. The green belt around Kidlington needs to be preserved, not eaten up by more housing. It separates Kidlington from Oxford providing and protecting agricultural activities and it gives England its unique character of distinct communities. A designated green belt must not be built upon as its advantages far outweigh its disadvantages.	The plan is unsound and request that much lower housing numbers in the original draft local plan be reinstated and in particular the land referred to remains as agricultural/equestrian use.			
179/80	Matthew	Bates	Oxford City Council			There is no explicit acknowledgement of jointly agreed strategic priorities, including agreement to deliver circa 100,000 homes in Oxfordshire in the period 2011-31, delivery of the Oxford and Oxfordshire City Deal, or the Oxfordshire Strategic Economic Plan. This fails to meet the Duty to Cooperate and NPPF requirement to effectively address cross-boundary priorities. There needs to be a mechanism for early review of the Cherwell Plan to make provision for a portion of Oxford's unmet need as identified in the SHMA 2014, as well as potential underdelivery on other strategic sites in Cherwell.	Add a new subsection to read as follows (part 1): <u>Early Review of the Cherwell Local Plan Part 1</u> <u>A27f An Oxfordshire wide Strategic Housing Market Assessment (SHMA) was published in March 2014, which showed very significant unmet housing needs across the whole of the housing market area of Oxfordshire. As well as identifying a higher level of need in Cherwell than previously planned for, Oxford City has unmet housing need of between 24,000 and 32,000, only a proportion of which can be met within its own boundaries. Under the Duty to Cooperate, neighbouring Councils must plan across administrative boundaries to meet all unmet housing need.</u>			
179/81	Matthew	Bates	Oxford City Council			There is no explicit acknowledgement of jointly agreed strategic priorities, including agreement to deliver circa 100,000 homes in Oxfordshire in the period 2011-31, delivery of the Oxford and Oxfordshire City Deal, or the Oxfordshire Strategic Economic Plan. This fails to meet the Duty to Cooperate and NPPF requirement to effectively address cross-boundary priorities. There needs to be a mechanism for early review of the Cherwell Plan to make provision for a portion of Oxford's unmet need as identified in the SHMA 2014, as well as potential underdelivery on other strategic sites in Cherwell.	Add a new subsection to read as follows (part 2): <u>A27g There is also recognition that the housing delivery target in Policy BSC1 will require a very substantial increase in the rate of housing delivery compared to historical rates of delivery. This will be a challenge within the current spatial strategy of focusing growth primarily on Bicester, Banbury and the former RAF Upper Heyford site.</u>			

Rep No.	First Name	Surname	Organisation	3. Main / Minor	3. Mod No.	6. Reasons for Plan not being Legally Compliant or Sound	7. Changes suggested by representor to make the Plan legally compliant or sound	8. Reasons for Plan being legally compliant or sound	10. Comments on Updated SA	General Comments
179/82	Matthew	Bates	Oxford City Council			There is no explicit acknowledgement of jointly agreed strategic priorities, including agreement to deliver circa 100,000 homes in Oxfordshire in the period 2011-31, delivery of the Oxford and Oxfordshire City Deal, or the Oxfordshire Strategic Economic Plan. This fails to meet the Duty to Cooperate and NPPF requirement to effectively address cross-boundary priorities. There needs to be a mechanism for early review of the Cherwell Plan to make provision for a portion of Oxford's unmet need as identified in the SHMA 2014, as well as potential underdelivery on other strategic sites in Cherwell.	Add a new subsection to read as follows (part 3): <u>A27h Therefore, Policy PSD2 commits to an early review of the Cherwell Local Plan. This will include an assessment of whether the Green Belt boundary around Oxford should be reviewed to ensure the wider housing needs of the area can be met in a sustainable way. The early Plan review will also consider whether the delivery of housing to meet Cherwell's own district-wide objectively assessed needs could be better delivered by means of an alternative spatial strategy, including consideration of the role of the Green Belt to the north of Oxford. More detail is set out in the supporting text to Policy BSC1: District Wide Housing Distribution.</u>			
179/83	Matthew	Bates	Oxford City Council			There is no explicit acknowledgement of jointly agreed strategic priorities, including agreement to deliver circa 100,000 homes in Oxfordshire in the period 2011-31, delivery of the Oxford and Oxfordshire City Deal, or the Oxfordshire Strategic Economic Plan. This fails to meet the Duty to Cooperate and NPPF requirement to effectively address cross-boundary priorities. There needs to be a mechanism for early review of the Cherwell Plan to make provision for a portion of Oxford's unmet need as identified in the SHMA 2014, as well as potential underdelivery on other strategic sites in Cherwell.	Add a new subsection / new policy to read as follows (part 4): <u>Policy PSD2 Early Review of the Cherwell Local Plan Part 1</u> <u>The Council will fulfil its statutory 'duty to co-operate' in partnership with all the other Oxfordshire authorities, in accommodating a proportion of Oxford's unmet housing need. An Early Plan Review of the Cherwell Local Plan 2011-31 will determine the number of additional homes to be accommodated in Cherwell District to be incorporated into a revised housing target, and may require additional strategic allocations.</u> An early Plan review should take place within 2 years of adopting of the current version of the Plan. If this is not achieved, there should be a firmly defined sanction, that the current Plan would no longer be considered up-to-date within the meaning set out in paragraph 14 of the NPPF			
179/84	Matthew	Bates	Oxford City Council			There is no explicit acknowledgement of jointly agreed strategic priorities, including agreement to deliver circa 100,000 homes in Oxfordshire in the period 2011-31, delivery of the Oxford and Oxfordshire City Deal, or the Oxfordshire Strategic Economic Plan. This fails to meet the Duty to Cooperate and NPPF requirement to effectively address cross-boundary priorities. There needs to be a mechanism for early review of the Cherwell Plan to make provision for a portion of Oxford's unmet need as identified in the SHMA 2014, as well as potential underdelivery on other strategic sites in Cherwell.	Add a new subsection to read as follows (part 5): <u>The Early Plan Review will review the Oxford Green Belt to consider whether Oxford's unmet housing need, and the overall needs of Cherwell District and the housing market area of Oxfordshire, constitute exceptional circumstances requiring a change to the Green Belt boundary, and will establish a long term permanent boundary to comply with the requirements of the National Planning Policy Framework.</u>			
179/85	Matthew	Bates	Oxford City Council			There is no explicit acknowledgement of jointly agreed strategic priorities, including agreement to deliver circa 100,000 homes in Oxfordshire in the period 2011-31, delivery of the Oxford and Oxfordshire City Deal, or the Oxfordshire Strategic Economic Plan. This fails to meet the Duty to Cooperate and NPPF requirement to effectively address cross-boundary priorities. There needs to be a mechanism for early review of the Cherwell Plan to make provision for a portion of Oxford's unmet need as identified in the SHMA 2014, as well as potential underdelivery on other strategic sites in Cherwell.	Add a new subsection to read as follows (part 6): <u>The Early Local Plan Review will be completed by the date which is 2 years following the adoption of the current Cherwell Local Plan 2011-31 Part 1. From this date, the Cherwell Local Plan 2011-31 will be considered out-of date as set out in paragraph 14 of the NPPF, and therefore no longer material under Section 38(6) of the Planning and Compulsory Purchase Act 2004. In this event, all planning applications submitted on or after this date will be considered against the NPPF and Presumption in favour of Sustainable Development.</u>			

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179/86	Matthew	Bates	Oxford City Council			The Table at Appendix 6 needs an indicator to measure progress in undertaking an early review of the local plan	Insert additional row in the table at Appendix 6 as follows: <u>Policy PSD2 – Early Review of the Cherwell Local Plan</u> <u>[Indicator:] Meet milestones for Early Review of the Cherwell Local Plan to be set out in revised Local Development Scheme</u> <u>[Target:] Adoption of a revised Cherwell Local Plan 2011-31 Part 1 addressing wider need within the housing market area as identified in the SHLAA 2014, within 2 years of adoption of this version of the Plan.</u>			
179/87	Matthew	Bates	Oxford City Council			There is a continuing failure to address effectively cross-boundary issues. There has been an absence of meaningful dialogue. The Plan as amended moves away from the spirit of joint working. CDC does not support a jointly agreed spatial strategy for the Housing Market Area. The City Council is not confident that Cherwell will plan for the agreed unmet needs of the HMA on a truly cross-boundary and cooperative basis.				
179/88	Matthew	Bates	Oxford City Council			The City Council considers that the 'meeting district needs only' approach is unsound. The NPPF requires local plans to meet the full, up-to-date, objectively assessed needs of the Housing Market Area (HMA), rather than the objectively assessed needs of the district.				
179/89	Matthew	Bates	Oxford City Council			A new policy, which I have termed for now Policy PSD2, should be inserted into the Plan to ensure a robust framework for an early Plan review. This is the course of action recommended by the Inspector when suspending the examination in June.				
301/50	Bev	Hindle	Oxfordshire County Council			Table G - Table of Detailed Proposed Amendments to the Local Plan				
301/73	Bev	Hindle	Oxfordshire County Council			Policies Banbury 1 to 19 As a result of the additional development growth proposals at Banbury, consequential changes are required to the site specific policies to secure contributions to support the delivery of infrastructure and services. as identified in the Banbury Movement Strategy. These will mitigate impacts and improve operation of the highway network in Banbury, including: i) Hennef Way junctions, Bridge Street/ Cherwell Street junction. ii) Mitigation to be provided for M40 Junction 11 (potential link road). iii) Measures to facilitate travel by sustainable modes.	For Banbury Policies as appropriate, add the following text: <u>"Developers to provide financial contributions towards mitigation identified in the Banbury Movement Strategy."</u>			
301/87	Bev	Hindle	Oxfordshire County Council			Policy INF 1 The scale of the modifications proposed may require infrastructure that has not had sufficient time to be fully defined and incorporated into the plan. The option of an early review as part of Policy INF 1 provides an identified mechanism in the plan to incorporate necessary infrastructure once it is clarified.	Insert bullet point: <u>"Committing to an early review to ensure timely and deliverable infrastructure if necessary"</u>			