

CHERWELL LOCAL PLAN REVIEW

Regulation 19 Local Plan Consultation

CONSULTATION STATEMENT

Part 4

July 2025



Cherwell
DISTRICT COUNCIL
NORTH OXFORDSHIRE

Contents

1. Introduction	2
2. The ‘Duty to Co-operate’	2
3. Previous Consultations	3
4. Proposed Submission Consultation and Engagement	6
Consultation Arrangements	7
Distribution	8
Internal Communications	12
5. Consultation Responses	14
Comments Received	14
6. Main comments raised in representations	16

Appendices

- Appendix 1:** Public Notice (Statement of availability and Representations Procedure)
- Appendix 2:** Consultation Letters
- Appendix 3:** Consultation Summary Leaflet
- Appendix 4:** Representation Form
- Appendix 5:** Exhibition Banners
- Appendix 6:** Press Adverts
- Appendix 7:** Press Releases
- Appendix 8:** Articles on Staff Intranet
- Appendix 9:** Town and Parish Meeting Notes
- Appendix 10:** Cherwell Parish Bulletin Emails
- Appendix 11:** Summary of Representations
- Appendix 12:** Summary of Representations and Officer Response

1. Introduction

- 1.1 This Part 4 of the Consultation Statement reports on the consultation undertaken on the Cherwell Local Plan Review Pre-Submission between **19 December 2024 to 25 February 2025**.
- 1.2 The Council has a statutory duty to consult and seek representations in preparing a Local Plan. It must also ensure that there is on-going co-operation with prescribed bodies under a 'Duty to Cooperate'.
- 1.3 This statement demonstrates consultation on the Cherwell Local Plan Review has been undertaken in accordance with the relevant Regulations and the adopted Statement of Community Involvement (SCI). The 2021 SCI is available online at <https://www.cherwell.gov.uk/info/33/planning-policy/383/statement-of-community-involvement>.
- 1.4 The responses received through the consultation process have been used to shape and inform the development of the Cherwell Local Plan Review.
- 1.5 The timetable for preparation of the Cherwell Local Plan Review is presented in the Council's Local Development Scheme which is available online.

2. The 'Duty to Co-operate'

- 2.1 Section 110 of the Localism Act 2011 introduced a 'Duty to Cooperate' which places a legal duty on local authorities to consider strategic planning beyond their boundaries and provides a mechanism to address larger issues than can be dealt with by the local planning authority working alone.
- 2.2 The application of the 'Duty to Co-operate' is also informed by the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG).
- 2.3 Through the 'Duty to Cooperate', the Government expects that Councils will work collaboratively with other prescribed bodies¹ to ensure that cross boundary strategic issues are properly coordinated and clearly reflected in individual Local Plans. Cherwell District is committed to fulfilling this Duty and, as a matter of practice, works closely with neighbouring authorities² and other partner organisations and stakeholders.

¹ The prescribed bodies are defined in the Town and Country Planning (Local Planning) (England) Regulations 2012

² Buckinghamshire Council, Oxford City Council, Oxfordshire County Council, South Oxfordshire District Council, Stratford-on-Avon District Council, Vale of White Horse District Council, Warwickshire County Council, Warwick District Council, West Northamptonshire Council, West Oxfordshire District Council

- 2.4 The local planning authorities that border Cherwell District are:
- Buckinghamshire Council
 - Oxford City Council
 - Oxfordshire County Council
 - South Oxfordshire District Council
 - Stratford-On Avon District Council
 - Vale of White Horse District Council
 - Warwickshire County Council
 - Warwick District Council
 - West Oxfordshire District Council
 - West Northamptonshire Council
- 2.5 The Oxfordshire Councils are assisted in meeting the Duty to Co-operate by the Oxfordshire Leaders Joint Committee, formerly known as the 'Future Oxfordshire Partnership' and previously the 'Oxfordshire Growth Board'. It is a Joint Committee comprising Cherwell District Council, Oxford City Council, South Oxfordshire District Council, Vale of White Horse District Council, West Oxfordshire District Council and Oxfordshire County Council.
- 2.6 Neighbouring authorities and other statutory consultees including Environment Agency, Natural England, Historic England, National Highways and the Integrated Care Board (ICB) were notified of formal consultation stages by e-mail/letter and meetings arranged during the preparation of the Plan.
- 2.7 The Council has prepared a Duty to Co-operate Statement that sets out in detail how the Council has complied with this duty.

3. Previous Consultations

Cherwell Local Plan Review: Community Involvement Papers 1 and 2

- 3.1 The Cherwell Local Plan Review was initially launched in March 2020 with the publication of the Local Development Scheme (LDS) which sets out the timetable for the preparation of the Plan.
- 3.2 On **31 July 2020** the Council published its **first Community Involvement Paper** and the Sustainability Appraisal Scoping Report for a six-week period of consultation to Monday 14 September 2020. It was accompanied by a 'call for sites' and an invitation for applications for Local Green Space designation.
- 3.3 The focus of the 2020 consultation was the identification of issues and needs and key themes for the Plan.

- 3.4 On **29 September 2021** the Council subsequently published a **second Community Involvement Paper** and Interim Sustainability Appraisal for a six-week consultation to 10 November 2021. This second Community Involvement Paper was a District-wide 'Options' consultation in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Further site promotions and Local Green Space applications were received and considered at this stage.
- 3.5 The consultation paper proposed a place and people-based draft vision for the district with a focus on developing a sustainable local economy, meeting the climate change challenge and healthy place shaping. The paper included a place-based discussion of Banbury, Bicester, Kidlington, Upper Heyford and the rural areas.

Oxfordshire Plan 2050

- 3.6 From 2018, the Oxfordshire Councils worked on a countywide Joint Spatial Plan, the Oxfordshire Plan 2050 with an agreed programme in the Local Development Scheme. The 2050 Plan was subject to two rounds of consultation, 'Introducing the Oxfordshire Plan' in February 2019, and a 'Regulation 18 (Part 2)' in July 2021.
- 3.7 The Oxfordshire Councils ceased the preparation of the Oxfordshire Plan in August 2022 due to being unable to agree on a joint approach to planning for future housing needs.
- 3.8 Until August 2022, it had been anticipated that the strategic framework for planning in Oxfordshire would have been provided by the Oxfordshire Plan. The scope of the Cherwell Local Plan Review and its evidence was reconsidered and reviewed following the cessation of joint work and ahead of the Cherwell's consultation on a Draft Plan in January 2023. This included consultation at Draft Plan stage on an extended Plan period covering 2020-2042.

Cherwell Local Plan Review: Consultation Draft Plan

- 3.9 On 19 of January 2023 officers took a Draft Plan (Regulation 18) to the Council's Executive for consultation endorsement. The Consultation was deferred to allow Officers to consider comments from Overview and Scrutiny (11 January 2023). These were:
- The balance of affordable housing included in the plan is not ambitious enough or adequate.
 - Clarity and assurance there is no change from the partial review of the Local Plan regarding Frieze Farm in Kidlington and its provision as an alternative Golf Course location.

- It is important that all infrastructure keeps pace with development as well as ensuring satisfactory integration between new developments and established communities.
- The importance of farming in the district has been recognised in the draft, but it should be given more prominence.
- Noting the reference to Bicester Strategic Corridors, consideration should be given to creating a formal Green Belt around Bicester.
- More should be done to maintain the Green Ring around Kidlington.
- Rural allocation of housing should be equitable.
- Executive to assure itself that the wording of policies included in the plan is strong enough, particularly those in relation to Climate Action and viability.
- That Members be given more opportunities to engage, provide feedback and comments during the Regulation 18 consultation.

3.10 Following consideration of Overview and Scrutiny comments, officers reviewed the scope and presentation of the Draft Plan with greater emphasis on consultation, with feedback being more explicitly encouraged. Overview and Scrutiny Members had the opportunity to attend two of the Local Plan Members Advisory Group meetings prior to the Draft Plan being considered by the Council's Executive.

3.11 On **22 September 2023** the Council published a (Regulation 18) Consultation Draft Local Plan and Sustainability Appraisal for a six-week consultation to 3 November 2023 to engage with local communities, partners and stakeholders inviting comments and feedback on emerging proposals. Further site promotions and Local Green Space applications were also received and considered at this stage.

3.12 The Draft Plan consulted on a revised vision and objectives and draft generic policies under the themes:

- Meeting the Challenge of Climate Change and Ensuring Sustainable Development.
- Maintaining and Developing a Sustainable Local Economy
- Building Healthy and Sustainable Communities

3.13 The Plan was drafted in a conversational manner with prompting questions on key matters through each section of the document. A key focus of the plan was to explain in detail the housing and employment need evidence including Oxford's unmet housing need and present 'working assumptions' for comment.

3.14 The Draft Plan consulted on a draft District spatial strategy and area specific strategies and policies for Banbury, Bicester, Kidlington and Heyford Park. Potential sites for allocation were included for consultation encouraging comments on whether these sites should be explored further for potential

allocation and inviting the submission of alternatives. The Sustainability Appraisal supporting the Draft Plan included an assessment of reasonable alternatives.

3.15 Adopted Local Plans policies proposed to be retained/saved were also presented for comment.

3.16 Statements of Consultation which summarised the issues raised during each of these consultations have previously been published. The documents are available on-line at:

<https://www.cherwell.gov.uk/info/83/local-plans/729/local-plan-review-2040---planning-for-cherwell-to-2040>

4. Proposed Submission Consultation and Engagement

4.1 Between Draft Plan (Regulation 18) consultation and Proposed Submission (Regulation 19) consultation some key changes of circumstances occurred:

- Government consultation in July-September 2024 on reforms to the standard method and other changes to the NPPF, and subsequent publication of a revised NPPF on 12 December 2024. The Council published a statement noting the Plan was being published under the transitional arrangements and confirming the Plan meets 81.5% of the local housing need figure in accordance with revised NPPF paragraph 234(a) requirement to meet 'at least 80% of local housing need'. This was also made clear in the consultation material (Summary leaflet and Exhibition Banners).
- Withdrawal of the Oxford Local Plan 2040 following the Inspectors' conclusions in September 2024 after the Plan Examination Initial Hearings. Following the recommendations of the Oxford City Local Plan Inspectors, officers from Cherwell and the City met on 15 October 2024 to discuss the implications for both local plans. It was agreed at that meeting that the adopted Oxford City Local Plan 2036 should be used to assess unmet need. It was also agreed that the 4,400 homes for Oxford's unmet need already allocated in Cherwell could be rolled forward into the Cherwell Local Plan Review. No additional unmet need was requested at that meeting. Oxford City subsequently withdrew their 2040 Plan in January 2025.

Consultation Arrangements

- 4.2 On 19 December 2024 the Council published a Regulation 19 Proposed Submission Local Plan for consultation. The consultation welcomed representations on the Plan's soundness and legal compliance.

How did we consult?

- 4.3 The formal consultation was scheduled to run for 8 weeks, in consideration of the Christmas Period, from 19 December 2024 to 14 February 2025.
- 4.4 A technical issue was brought to our attention whereby, during the upload process, a part of one of the appendices of the Regulation 18 Consultation Statement had not uploaded to the website correctly. The consultation period was extended for a further two weeks to allow for full consideration of the Regulation 18 Consultation Statement. The consultation period ended on 25 February 2025.
- 4.5 Consultees were notified of this extension on 13 January 2025; the Public Notice (including statement of representations procedure and statement of fact) was also updated to reflect this extension.
- 4.6 A summary of how people were invited to make representations is set out below:
- Formal notifications in the press (Appendix 6)
 - Press releases (Appendix 7)
 - Hard copies available at deposit locations
 - Exhibition banners (Appendix 5)
 - Consultation letters and emails (Appendix 2) to those on the Local Plan database
 - Staffed drop in sessions
 - Summary leaflet (Appendix 3)
 - Social media campaign via Facebook, X, Instagram, LinkedIn, Nextdoor, Bluesky, Threads
 - A dedicated Local Plan website
 - Main council's website
 - Meetings with statutory consultees and neighbouring authorities
- 4.7 People and organisations were able to comment on the consultation by:
- Filling in the representation form (available on the Council's website)
 - Filling in the representation form at staffed drop in sessions
 - Writing to the Local Plan team
 - Emailing the Local Plan team

- Using the Council's online consultation portal and completing the online form.

Distribution

- 4.8 The consultees listed in the Council's Statement of Community Involvement and anyone who had registered on the Council's Local Plan database (including respondents of previous consultations) were notified by email or letter and were asked to comment on the plans soundness and legal compliance. Circa 2000 consultees (including statutory consultees as set out in the regulations) were consulted. Those who had responded to previous stages of consultation were added to the database, and at request individuals were also removed from this.
- 4.9 Hard copies were also placed at deposit locations across the district including libraries and Council offices. In addition, hard copies were placed in Woodstock and at West Oxfordshire District Council offices. A consultation summary leaflet was also produced and made available at these locations as well as on the Council's website.
- 4.10 Letters were sent to all Town and Parish Councils in the district enclosing a copy of the public notice and the Draft Local Plan Review. Contact details for the Planning Policy team were provided in case of any queries or difficulties in accessing the consultation documents online.
- 4.11 All Council Members received a notification with details of the consultation.
- 4.12 All Directors, Assistant Directors and other relevant officers were kept up to date on plan progress at key stages prior to the consultation.
- 4.13 We aimed to increase awareness and address groups identified as potentially underrepresented in planning consultation and engagement by publishing a consultation booklet. This summarised the purpose of the consultation, provided information on how to access the consultation documents and explained how to submit comments and the deadline for submitting representations.
- 4.14 Included on the consultation booklet was a QR code which, when scanned, took the user directly to the Local Plan Review consultation on the Council's consultation and engagement platform 'Citizen Space'. The QR code provided access to the consultation and supporting documents more quickly than by manually entering a URL, thereby helping to achieve a more convenient user-friendly digital planning service. The public notice, and booklet are included in Appendix 1 and 3 respectively.

- 4.15 The three consultation bodies under the SEA Regulations – Natural England, Historic England and the Environment Agency – were sent a separate email inviting comments on the Draft Local Plan Review and supporting Sustainability Appraisal and Habitat Regulations Assessment.
- 4.16 Comments were sought regarding the Plan’s soundness and legal compliance. A representation form was made available for comment. The representation form is attached at Appendix 4. In addition, respondents were encouraged to submit comments online via the Council’s digital consultation and engagement platform, Citizen Space, available at:
<https://cherwell.citizenspace.com/planning-policy/cherwell-local-plan-review-2042/>
- 4.17 Hard copies of the consultation documents were also available on request.

Website and Online Consultation

- 4.18 The Council's dedicated Cherwell Draft Local Plan Review webpages³ contained all the details relevant to the consultation, including the Draft Local Plan and appendices, Policies Map, supporting documents, evidence base and representation form. A designated email address (PlanningPolicyConsultation@cherwell-dc.gov.uk) was supplied for the submission of representations. The website also included a link to the Council’s digital consultation and engagement platform Citizen Space <https://cherwell.citizenspace.com/planning-policy/cherwell-local-plan-review-2042/> where interested parties could view the consultation documents and comment on the questions set out in the document online.

Press Coverage

- 4.19 A statutory notice was placed in the Oxford Mail, Bicester Advertiser and Banbury Guardian to advertise the commencement of the consultation (see Appendix 6).
- 4.20 Four press releases were published on the Council’s website and issued to local media and interested stakeholders prior to, and during the consultation period. The press releases are summarised in Table 1 and are included in Appendix 7. Coverage in the media including links to the relevant articles, is included in Table 2.

Table 1: Media releases

Date	Press release
05/12/2024	New Cherwell Local Plan approved for final consultation confirmed that a consultation on the proposed Cherwell Local Plan 2042 was

³ <https://www.cherwell.gov.uk/local-plan-review-2042-submission>

	approved by councillors on 5 December and included a quote by Councillor Conway, Portfolio Holder for Planning and Development Management
19/12/ 2024	Call for views on new Cherwell Local Plan publicises the commencement of the consultation and provided information on the consultation period and in-person events. This also included a quote by Councillor Conway, Portfolio Holder for Planning and Development Management
16/01/ 2025	Opportunity to meet planners at consultation events reminded people of the consultation and the in-person events. This also included a quote by Councillor Conway, Portfolio Holder for Planning and Development Management
10/02/2025	Two weeks left to comment on new Local Plan provided a final reminder of the consultation and encouraged people to provide comments. This also included a quote by Councillor Conway, Portfolio Holder for Planning and Development Management

Table 2: Media Coverage

Headline	Date	News outlet
Plan for thousands of new homes considered	5/11/2024	BBC
New Local Plan about to move to final stage	26/11/2024	Banbury FM
Residents to have their say on Cherwell Local Plan 2042	7/12/ 2024	Oxford Mail
Oxford accuses neighbours of dodging housebuilding targets	16/12/2024	The Herald Series
Cherwell Local Plan 2042 being discussed with public	21/12/2024	Oxford Mail
A public consultation has begun on Cherwell's proposed new Local Plan	2/01/2025	Banbury FM
Cherwell residents to find out more about Local Plan 2042	16/01/2025	Oxford Mail
Meet the experts - and give your views on future plans for the Banbury and Bicester areas	21/01/2025	Banbury Guardian
Councillors to find way to ensure increased Banbury and Bicester housing demands can be met	3/02/2025	Banbury Guardian
Drop in to Lock 29 to learn what the new Local Plan is all about	6/02/2025	Banbury FM

Headline	Date	News outlet
8,000 Oxfordshire homes with planning permission not built	7/02/2025	Oxford Mail
Council covering Banbury says it's been left vulnerable after policy means they have to show five years' housing supply	10/02/2025	Banbury Guardian
Two weeks left to respond to future plans for the Banbury and Bicester areas - residents urged to give their views	11/02/2025	Banbury Guardian
Two weeks left to comment on plan for district's future	11/02/2025	Banbury FM
Cherwell Local Plan 2042 consultation closing soon	11/02/2025	Oxford Mail
Bicester needs 'necessary infrastructure' to match growth	19/02/2025	Oxford Mail
Cherwell Economic Forum 2025 held at Bicester Motion	20/02/2025	Oxford Mail
Oxfordshire plans for 450 homes near Blenheim Palace opposed	24/02/2025	Oxford Mail

Social Media

- 4.21 The Council's Facebook, X and Instagram platforms were used extensively prior to, and during the consultation.
- 4.22 A post made on 6th December 2024 announced that the proposed Cherwell Local Plan has been approved by the Executive Committee for consultation and a further post on 19th December 2024 announced the beginning of the consultation.
- 4.23 During the consultation period there was a post made approximately once a week to increase awareness of the consultation and how to participate. Posts included a link to the Local Plan webpage and the digital consultation and engagement platform. Posts were also made on the following council platforms- Nextdoor, Bluesky, Threads and LinkedIn.

Table 3: Summary of social media reach

Date of post	Reach
Facebook	
6 December 2024	1,709 people reached
19 December 2024	7,887 people reached

Date of post	Reach
8 January 2025	1,162 people reached
15 January 2025	13,066 people reached
20 January 2025	832 people reached
27 January 2025	1,154 people reached
2 February 2025	1,487 people reached
7 February 2025	1,339 people reached
10 February 2025	1,487 people reached
Instagram	
6 December 2024	132 people reached
19 December 2024	52 people reached
8 January 2025	54 people reached
15 January 2025	101 people reached
2 February 2025	69 people reached
7 February 2025	80 people reached
X	
6 December 2024	158 people reached
19 December 2024	184 people reached
8 January 2025	141 people reached
15 January 2025	554 people reached
7 February 2025	186 people reached
10 February 2025	139 people reached
Nextdoor	
8 January 2025	2, 566 people reached
10 February 2025	1, 874 people reached
Bluesky	
7 February 2025	Does not provide reach data
7 February 2025	Does not provide reach data
10 February 2025	Does not provide reach data
Threads	
7 February 2025	2 people reached
7 February 2025	2 people reached
10 February 2025	6 people reached
Linkedin	
12 December 2024	1, 592 people reached
19 December 2024	1, 060 people reached
10 February 2025	293 people reached

Internal Communications

- 4.24 On 12 December 2024 the staff weekly internal update, which is sent to all colleagues, publicised the Cherwell Local Plans approval by Executive Committee for Regulation 19 consultation. This update is included in Appendix 8.

- 4.25 Direct email notifications were also sent to the Chief Executive, Assistant Director for Planning and Corporate Director for Communities to advise that the consultation period had commenced.

Consultation Events

Drop-in Events

- 4.26 We held 4 consultation drop in events during the consultation period as follows:

Monday 20 January, 3pm-7pm

Kidlington Exeter Hall, Oxford Rd, Kidlington, OX5 1AB

Friday 24 January, 3pm-7pm

Bicester Littlebury Hotel, Kings End, Bicester, OX26 6DR

Tuesday 28 January, 2pm-5:15pm

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

Saturday 8 February, 11am-3pm

Lock 29, Castle Quay Waterfront, Castle Street, Banbury, OX16 5UN

- 4.27 The exhibition boards are reproduced at Appendix 5.

Engagement with Town and Parish Council/Meetings and Stakeholders

- 4.28 Town and Parish Councils were invited to an online briefing by the Planning Policy Team on 4 February 2025 between 18:00-20:00. The briefing started with a presentation which covered the changes in the National Planning Policy Framework (December 2024), the Cherwell Local Plan consultation period, an update on the Local Plan, a guide to making representations and next steps following the close of the consultation. There was then time for councillors to ask questions. Notes from the meeting are included at Appendix 9.
- 4.29 A reminder of the Local Plan consultation was also included in the Cherwell Parish Bulletin sent to Town and Parish Councils on 16 December 2024. This is included at Appendix 10.
- 4.30 Moreover, updates on the Local Plan were given at the biannual Parish Liaison meeting held on 6 November 2024. The meeting included an update on the proposed timeline to Regulation 19 Consultation, an overview of the proposed plan, and consultation arrangements.
- 4.31 Furthermore, requests were made by Bicester Town Council and Chesterton Parish Council for individual meetings with the Planning Policy Team. Officers visited Chesterton Parish Council on 6 February 2025 and Bicester Town Council on 27 March 2025.

- 4.32 Statutory consultees were notified of formal consultation stages by e-mail/letter and meetings arranged during the preparation of the Plan. Engagement with statutory consultees included Local Plan specific meetings as well as workshops and meetings to support the preparation of Local Plan evidence including the Infrastructure Delivery Plan, Habitats Regulation Assessment, Strategic Flood Risk Assessment, Heritage Impact Assessments and transport evidence documents.
- 4.33 Additional to bilateral meetings, Oxfordshire planning policy officers meet on a regular basis to discuss progress on Local Plans and relevant cross boundary policy matters (OPPO meetings).
- 4.33 The Council's Duty to Co-operate Statement sets out in detail how the Council has complied with this duty.

5. Consultation Responses

Comments Received

- 5.1 A total of 345 representations were received from residents, individuals and organisations. These generated approximately 2087 separate comments.
- 5.2 All comments made will be submitted to the Planning Inspectorate for examination and will be made available online on submission of the Plan.
- 5.3 A Schedule of Representations in Policy Order which contains a summary of the comments received is presented in **Appendix 11** of this Consultation Statement.
- 5.4 The summary of responses has been prepared by Officers to provide a guide to highlight the broad issues raised during this stage of consultation. It should not be taken as a substitute for the full and comprehensive set of all duly made representations.
- 5.5 A full set of representations are publicly available online at: <https://www.cherwell.gov.uk/info/83/local-plans/729/planning-for-cherwell---local-plan-review/5>
- 5.6 These will also be available in due course in the Examination Library on the Council's website once the Plan is submitted.

Who Responded to the Consultation?

- 5.7 Consultation materials were made available for comment to a wide range of organisations and individuals and representations were received from the following:
- Adjoining local authorities and other local authorities;
 - Other organisations and companies (e.g. agents and developers);
 - Town and Parish Councils / Meetings;
 - Local councillors;
 - Residents' associations, community groups and other organisations;
 - Statutory bodies, utility companies, NHS, emergency services; and
 - Residents and other individuals.
- 5.8 A schedule of representations received by respondent, with corresponding representation ID can be found at the beginning of Appendix 11. A breakdown of representations received by type of respondent is included in Chart 1.

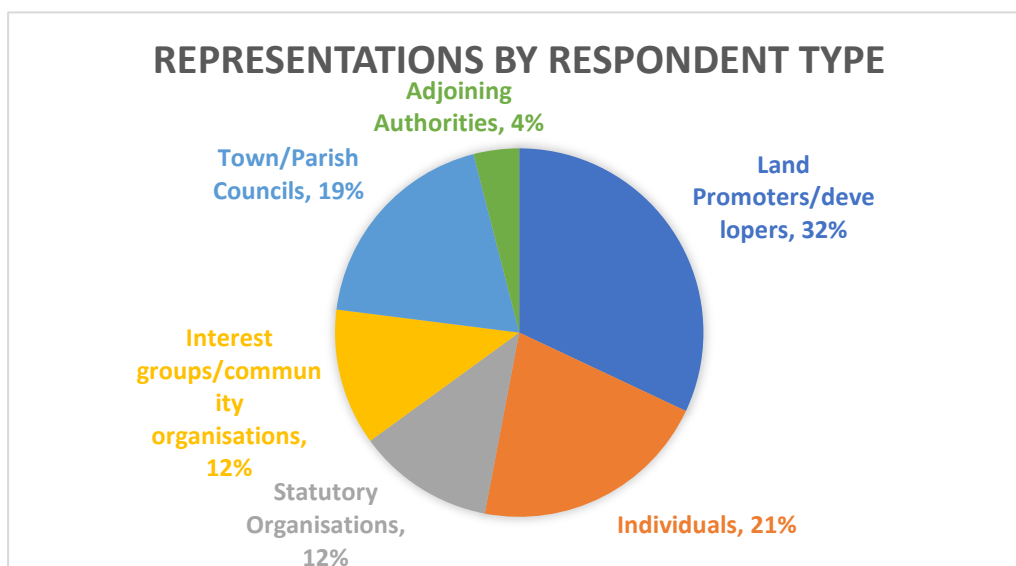


Chart 1: Summary of Representations received by type of respondent

How Representations Were Submitted

- 5.9 The majority of representations were submitted by email while some were received by post and 33 were submitted – either fully or in part – through the Council's online consultation and engagement platform Citizen Space. Some representations were submitted in duplicate by methods including email and post or email and Citizen Space.
- 5.10 Two representations were invalid. The first invalid representation was due to the representor not agreeing to the privacy notice and the latter due to the omission of their name, details or comments from the representation.

6. Main comments raised in representations

- 6.1 A summary of the main comments raised in representations has been prepared by Officers and it is presented in **Appendix 12** to this Consultation Statement. Again, Appendix 12 should not be taken as a substitute for the full and comprehensive set of all duly made representations.

How comments have been taken into account

- 6.2 The main issues are presented in Appendix 12 in Plan order and include and officer response to the issues raised. The officer response also indicates when there is an agreement on improvements to the Plan should the Inspector conclude these to be necessary following the Plan's examination. When the issue is raised by a 'prescribed body', this is made clear in the table.
- 6.3 A list of alternative (omission) sites submitted at this stage is included in Appendix 12.
- 6.4 Plan matters which received the majority of comments include:

Duty To Cooperate

A number of comments were received regarding whether the Council had met the Duty to Cooperate test. Concerns were raised, particularly from the development industry, that this test had not been met and concerns that no Statements of Common Ground had yet been published. However, it should be noted that no material Duty to Cooperate issues were raised from statutory bodies or neighbouring local authorities.

Transitional Arrangements

A number of comments were received, mainly from the development industry, that the Local Plan does not meet the transitional arrangements set out in the December 2024 National Planning Policy Framework (NPPF) regarding meeting 80% of the identified housing need. A number of comments were also made querying the inclusion of Oxford City's unmet need being included in the housing number. However, support is noted from neighbouring local authorities Vale of White Horse District Council and South Oxfordshire District Council who consider the inclusion of Oxford's unmet need within the housing requirement to be sound.

Plan Period

A number of comments were received regarding the plan period, with the majority of these objecting to the plan period beginning at 2020 and considering

that it should start later. Most of such comments were received from the development industry.

Housing Numbers

A number of comments were received on the proposed housing numbers. The majority of these came from the development industry and considered the housing numbers to be too low, promoting omission sites for allocation within the Local Plan. There were also a number of comments that the housing requirement is too high.

Spatial Strategy

Many comments were received relating to the spatial strategy. Specific representations in support were received from South Oxfordshire District Council, Vale of White Horse District Council and West Northamptonshire Council as well as from many Town and Parish Councils. There were also objections to the spatial strategy, many of which from the development industry, promoting additional growth in the villages and rural areas. There were some comments received regarding growth at Heyford Park.

Village Categorisation

A substantial number of representations commented on the village categorisation. Many of these comments were in support, most of these comments were received from Parish Councils and individuals. Comments objecting to the village categorisation generally came from Parish Councils where the Settlement Hierarchy Topic Paper had reclassified them as a higher order village, or from the development industry seeking further development in the rural areas. In such cases, omission sites were often promoted.

Settlement Gaps

A substantial number of comments were received on Policy COM 13: Settlement Gaps, both in support and in objection. Concern and objections regarding this policy were largely received from the development industry. Comments were also received regarding objection the policy including land in West Northamptonshire, however notably, West Northamptonshire Council wrote in support of this policy. Support for the policy was also received from Historic England and Oxfordshire County Council as well as from many of the Town and Parish Councils and individuals. Some comments of support were caveated that the policy should be strengthened.

