

Local Plan – Representations Received

This report sets out a summary of the content of the representations received. It does not offer a commentary on those representations. It has been prepared to provide an overview of the challenge of addressing a complex set of positions from respondents.

Local Plan Main Issues from Representations

1.Section: Policies for Development

1.1 Theme One: Policies for Developing a Sustainable Local Economy

- There is support for the increased employment land allocated in the Plan.
- Policy SLE1 is too flexible in allowing for other uses if employment does not come forward. This will lead to a loss of land for employment.
- The policies for employment sites are not flexible enough and unjustified in identifying the type of employment on each site. B8 uses should be allowed on all sites.
- The desire for high technology and low carbon industries is unjustified and unrealistic.
- Employment sites should only come forward for the types of employment intended.
- The role of internet shopping needs to be considered.
- The retail needs of the District need to be identified considering recent trends.
- There is no objection to the Council including a HS2 Policy but it should be redrafted as the current one implies the Council will be a key decision maker. Alternative wording is suggested. (HS2 Ltd)
- Car parking at the District's railway stations needs to be considered in more detail.
- There is concern about the amount of traffic generated by the proposed new development.
- Public transport should be considered to a greater extent and improved, including re-opening railway stations.

1.2 Theme Two: Policies for Building Sustainable Communities

- The RSS is likely to be revoked and the Council should not be using it.
- The RSS is based on out of date evidence and the Council should not be using it.
- In light of the 'Duty to Cooperate' the Council should work with the City Council to explore options for the unmet need for housing in Oxford.
- The Council has not met the affordable housing need in the District.

- There should be less growth at Banbury due to the topographical and landscape constraints and the increase in traffic congestion.
- There should be more growth at Banbury as it is not fulfilling this role as the most sustainable settlement and that set out in the South East Plan.
- Too much growth is focused at Bicester.
- Bicester should be the main focus for growth as it is less constrained
- There is too much growth at Banbury and Bicester and not enough in the rural areas.
- The villages have been given too much protection over the towns.
- Restricted growth in the villages is welcome.
- Housing growth is excessive if there are no jobs to go with new homes.
- Strategic sites will take too long to deliver so smaller sites need to come forward in the Local Plan as well.
- More housing is needed in Cherwell to meet trends in terms of decreasing household size and migration.
- Removal of reserve sites makes the Plan inflexible and should be re-considered.
- The Council has a significant shortfall in its 5 year land supply and it needs to bring forward more sites.
- The Plan should include Upper Heyford as a separate component within the settlement hierarchy in acknowledgement of its unique status as a significant brownfield development area
- Some villages which have received significant growth in recent years should get less development.
- The density policy is not justified and there should more flexibility.
- Affordable housing requirements are too onerous.
- There is lack of affordable housing for local people.
- There is support for the Rural Exception site policy.
- The 25% requirement in the Rural Exception policy is not justified.
- The housing mix policy is overly prescriptive and unjustified.
- Existing sites should be expanded for travelling communities.
- The provision of schools should be clarified and free schools should be acknowledged.

- The plan does not contain enough information about health and there should be more recognition that the health system has changed.
- More information is required on open space and recreation provision.
- References to places of worship should be included.
- The Council should work with builders and investors to improve the existing housing stock.
- Self-build should be promoted to a greater extent.
- There is no mention of the Olympic legacy.

1.3 Theme Three: Policies for ensuring Sustainable development

- The sustainable construction and environmental policies are needed and welcome
- The requirement for Code level 4 homes is unjustified and the building regulation requirements only should be used.
- The sustainable development policies place too many requirements on developers and are unjustified in their requirements.
- More attention should be given to the preservation of the environment and a low carbon strategy.
- There should be no development in the flood plain unless justified and flooding issues are resolved.
- There should be more woodland provided and rivers need more protection.
- A net gain in biodiversity is not always possible and should be removed as a requirement
- A Green Belt review should be undertaken for the local plan now, not later
- The Green Belt should remain generally protected
- Green buffers/boundaries are supported as they will protect villages around Banbury and Bicester.
- Green buffers/boundaries are unjustified, unclear; with no defined boundaries and will lead to a lack of housing supply.
- There should be protection of the historic environment, not just the built environment.
- The old towns of Banbury and Bicester should be considered and preserved.
- The conservation and enhancement of the Canal is welcomed but more is needed.
- Canal facilities may be needed outside the urban centres.

- Safer routes for cyclists should be included.
- Locally produced food should be encouraged.
- The impact of the loss of farming land is not recognised.
- Airport expansion should not go ahead.
- The Council should use Compulsory Purchase Orders (CPO) to bring forward sites.

2. Section: Policies for Cherwell's Places

2.1 Bicester

- Bicester could become a 'Garden city'
- The affects on surrounding villages of Bicester expanding is not considered in enough detail.
- The eco-town development should go through a public inquiry before any permissions are granted due to the significant number of homes proposed.
- The eco-town development will cause traffic and a loss of farm land.
- There is concern over the Lords Lane and Howes Lane junction becoming more congested.
- Development at Graven Hill will lead to traffic and will adversely effect villages to the south
- Job numbers at Graven Hill are not justified
- There is support for the preservation of RAF Bicester.
- Bicester Airfield requires protection and should not be built on.
- Bicester airfield should not accommodate an increase in powered flight due to noise concerns.
- The town centre boundary at Bicester is not clearly defined and conflicts with the masterplan
- The town centre area proposed is too large
- There is no justification for the local centres proposed for the sites at Bicester, development should be in the town centre.
- Any expansion of Bicester village should be fully justified.
- There should be greater promotion of the links between Bicester village and the town centre.

- Out of centre and edge of centre schemes should not be given permission as they affect the town centre.
- There remains a lack of services and facilities in Bicester.
- The proposed park at Pingle Fields is not appropriate due to traffic and pollution in this location.
- Too much development at Bicester will affect Otmoor in terms of flooding and water resources.
- Enterprise zones and Local Development Orders should be considered for Bicester to encourage growth.
- There is not enough land identified at Bicester for employment growth
- The Local Plan and Bicester Masterplan should be more similar in terms of policy.
- Congestion on the M40 and its junctions causes problems in Bicester and villages.
- There is no justification for the South East link road and route options have not been examined.
- Light pollution from Bicester will be a problem.

Sites at Bicester which are the subject of representations received include:

For housing:

- South west Bicester (Phase 2)
- South east Bicester
- Land at Langford Park farm for housing (consideration of inclusion as part of the Graven Hill site)
- North West Bicester (and separately for employment)
- Graven Hill
- South of Lodge riding stables
- Land at Gavray Drive
- Land west of Caversfield (east of the B4100)

For employment:

- Land north of Skimmingdish Lane (including B8 uses), extending the proposed allocation in the Local Plan.
- Bicester Gateway
- Bicester Sports Association land for commercial uses (existing uses are proposed to move to Chesterton)
- North West Bicester

Various landowners and developers requested the inclusion or removal of these sites from the Local Plan. Some requested changes to the strategic site policies, including the strategic site boundaries, that are proposed in the Local Plan. This included contending that higher housing numbers be accommodated on sites and reasons as to why they believe they should not have to meet some of the requirements of the proposed policies. All sites

submitted have been listed here but some will not be considered until the Council's Local Neighbourhoods Document is produced next year.

2.2 Banbury

- Canalside is supported by most but sites with the main site should be able to come forward individually.
- Canalside site is undeliverable and unviable.
- The Council needs to be more proactive in delivering Canalside, including working with landowners
- There is a lack of employment land allocated at Banbury in light of the need for economic growth
- Existing employment land should be used at Banbury
- There is limited land available for businesses that will be lost from Canalside
- Banbury town centre is already congested and development will add to this.
- Traffic is a concern in Banbury and the south east link road should be looked at in more detail.
- The area at Bridge Street is congested and will only get worse.
- New motorway junctions are needed.
- Bankside Road should be upgraded to allow for more traffic use.
- There is general support for the development of town centre sites.
- Out of town retail development should be stopped with a focus on the town centre
- There is support for the new park for Banbury but questions are raised about its distance from Banbury town centre.
- More sports and open space provision is required in Banbury particularly in areas identified as deficient.
- The football club at Bodicote Rugby Club will lead to significant traffic and light pollution
- The cemetery at Southam Road should be extended northwards.
- The Council is not doing enough to bring forward the Bankside development.
- BGN school potential to relocate should be recognised.

2.2.1 Sites at Banbury which are the subject of representations received include:

For housing:

- Mckay Trading Estate, Lower Cherwell Street, (Canalside Area) for housing

- Land south of Salt Way, east and west of the Bloxham Road for housing
- Land at Wykham Park Farm (south of Salt Way) for housing
- Land north of Hanwell Fields for housing
- Land east and West of Southam Road for housing
- Cemex site for housing
- Grundons site for housing
- Land west of Warwick Road for housing
- Land at Bankside, for housing
- Land south of the Broughton Road for housing

For employment:

- The 20 20 Cricket club site at Thorpe Lane
- Land to the east of the M40, adjacent to the A361
- Land at Grimsbury Reservoir
- Land west of the M40
- Land east of the M40
- Land at Waterworks way

Other Use:

- The Horton Hospital (for the neighbourhoods DPD)
- Land at Bolton Road (mixed use)
- Land at Kraft, Southam Road for a foodstore
- Land to the south of Canalside for Banbury United Football club and leisure uses

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There were a significant number of objections from local communities to development north and west of Banbury. There is a view that consultation has been inadequate.

Points of objections to development of land north of Hanwell Fields include:

- Negative effect on the landscape
- Will be prominent on the landscape
- Negative effect on Hanwell and its setting
- Loss of agricultural land
- Loss of established northern boundary of the town
- Negative effect on the setting of footpaths
- Light pollution
- Poor access to the town centre
- Traffic problems
- Existing facilities at Hanwell fields are at capacity
- Hanwell Observatory will be adversely affected by development north of Banbury.

Points of objections to development of land at Southam Road include:

- Negative effect on the landscape
- Will be prominent on the landscape
- Negative effect on the crematorium and its setting
- Loss of agricultural land

- Loss of established northern boundary of the town
- Negative effect on the setting of footpaths
- Loss of historic features
- Noise from the motorway
- Poor access to the town centre
- Loss of the historic environment
- Traffic problems

Points of objection to development of land west of Bretch Hill include:

- will have no benefits for the existing estate
- will lead to a loss of valuable landscape
- The impact on vistas from Wroxton Abbey, the setting of the historic arch and the rural setting of Withycombe farm
- Impact on Drayton

2.3 Kidlington

- There should be green buffers at Kidlington
- Policy Kidlington 1 is supported as it will allow employment growth
- Further land should be removed from the Green belt at Langford lane
- The scope for high tech growth and the need for employment at Kidlington is not catered for.
- The area identified for review at Langford Lane is not based on sound evidence and should be more definite.
- A proper Green Belt review for employment uses should be undertaken with a number of sites considered
- There should be review of the Green belt for housing.

2.3.1 Sites at Kidlington which are the subject of representations include:

For housing:

- Land at Webbs Way

For employment:

- Land adjacent to Begbroke Science Park
- Land at and near Langford lane
- Land at Langford Locks

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2.4 Rural Areas

- Villages are in the wrong categories according to evidence
- Policy Villages 1 is too restrictive preventing development in smaller villages.
- Policies do not allow brownfield sites to come forward.
- Policy Villages 2 should focus more development to the larger villages as they are more sustainable.
- Group 2 villages could accommodate more growth
- There are conflicts between the villages in Policy 1 and Policy 2.
- Infilling needs a broader definition to bring forward other sites.
- By restricting development in the rural area this prevents small sites coming forward for meeting needs.
- Only allowing limited housing in smaller villages is supported due to its potential impacts.
- Limited bus services need to be taken into account.
- Schools are at capacity
- There is a lack of recreation facilities in the villages.
- Water, sewerage and electrical facilities are inadequate for new development.
- Development will lead to traffic, congestion and a loss of village character.
- Sites should be able to come forward in the Green Belt for housing where there are exceptional circumstances.
- Policies on Green Belt villages are not clear.
- Village clustering should be considered carefully.
- It is important that new developments in the towns are required to produce travel plans so that associated vehicles are routed away from towns and villages.
- Broadband should be encouraged more strongly as this is vital for growth.
- There should be rural employment sites allocated in the rural areas.
- There is not enough in the Plan helping to address village services closing
- Upper Heyford should be preserved and made a tourism asset.
- The Free School should be mentioned at Upper Heyford

- If sites come forward they should be for well designed affordable housing.
- Some villages are producing or planning to produce 'Neighbourhood Plans'
- Development at South Banbury should be taken off Bodicote's housing allocation as it is considered part of Bodicote.

2.4.1 Sites which are the subject of representations in the rural areas include:

For housing:

- Land at Upper Heyford former Air base
- Land off Camp Road, Upper Heyford former Air base
- Land at Oak Farm, Milcombe
- Land off Merton Road, Ambrosden
- Land at Springfield Farm, Ambrosden
- Land north of Aynho Road, Adderbury
- Ashworth Land, Merton
- Land at White Post Road (Tappers Farm), Bodicote

For employment:

- Land at Shipton on Cherwell (Bonhams)
- Land at Cotefield Farm, Bodicote
- Land at junction 9 M40
- Land at the rear of Ploughley Road, Arcott

Various landowners and developers requested the inclusion or removal of these sites from the Local Plan. Some requested changes to the strategic site policies, including the strategic site boundaries, that are proposed in the Local Plan. This included contending that higher housing numbers be accommodated on sites and reasons as to why they believe they should not have to meet some of the requirements of the proposed policies. All sites submitted have been listed here but some will not be considered until the Council's Local Neighbourhoods Document is produced next year.

There were a significant number of objections from local residents from Wendlebury and nearby to the proposed South East Link Road at Bicester for the following reasons:

- Village will be boxed in by roads and there will be rat running.
- Car use will increase as accessing the village by foot will be reduced.
- No alternative routes are considered or proposed.
- The road will affect the setting of Wendlebury and will affect the setting of a scheduled ancient monument.
- The road crosses a BAP habitat.
- There will be encroachment of Bicester on Wendlebury.
- There is no mitigation of the road proposed.
- Consultation has been inadequate
- Why is there no Green Buffer for Wendlebury?

(While these comments were mainly made to the Bicester Masterplan, they need to be addressed in order to show that the proposed South East Link Road is 'deliverable'.)

3. Infrastructure

- No proper infrastructure plan has been produced for the Local Plan

- Power companies may have strategic power distribution circuits in areas proposed for development. These should be considered and if moved paid for by developers.
- Little consideration given to the capacity of the Horton Hospital with all the new housing.
- The IDP contains no reference to ecology and little reference to green infrastructure requirements

4. Evidence Base and Consultation

- There is a lack of available evidence and justification to support the Plan.
- The evidence is out of date.
- The housing numbers produced are confusing and inaccurate.
- There is no justification for switching between sites at Banbury.
- There is no evidence as to the amount of retail development that is needed in the towns.
- Extending the town centre boundaries is not justified.
- There is no up to date Strategic Housing Market Assessment.
- No Strategic Housing Land Availability Assessment has been produced.
- Work is required considering the jobs/housing ratio that is required.
- Work needs to be produced using the most up to date ONS projections and demographic information.
- The Council cannot determine how much development is needed and where until this evidence is produced.
- There is no evidence to support the fact the Council has projected forward growth at the same rate between 2026 and 2031.
- There is an over reliance on windfalls particularly as Bicester's windfall rate has been so low in recent years.
- There is no evidence for the distribution of housing proposed in the plan.
- There is no proper assessment of how many windfalls may come forward.
- More consultation is required as the public have not have a chance to comment on the new sites that are proposed.
- Council should consider the Local Housing Delivery Groups' "A review of local standards for the delivery of new homes (June 2012) Viability Testing Local Plans (June 2012) and budget announcement March 2011.

- The Plan needs to be viability tested
- Up to date ecological surveys are required for all of the proposed strategic site allocations
- The combined hydrological impact of the proposed sites at Bicester on the designated sites and priority habitats in the River Ray catchment and on the Bicester Wetland reserve Local Wildlife Site is of concern
- The justification for the categorisation of villages has not been published.
- There is no justification for the lower number of homes proposed to be allocated to the rural areas.
- There is no justification for the allocation of villages to a group in Policy for villages 1.
- The 'Craitlus study' is not sound.
- The population of Kidlington should be clarified in the Plan.
- The SA relies too much on the Landscape Sensitivity and Capacity Assessment. The LSCA was too subjective and flawed.
- The draft core strategy SA highlights the sustainability of sites, why have unsustainable sites been included.
- The Sustainability Appraisal is not accurate.
- The Council should undertake more consultation.
- The Council has breached human rights.

5. Main comments from Statutory Consultees and other authorities/organisations

Oxfordshire County Council

The County Council consider the Plan broadly meets the tests of soundness namely positively prepared, justified, effective and consistent with national policy. They make some comments which they believe can be overcome and joint working should continue. These are the main ones:

- The Plan will need to be changed to reflect recent announcements such as the electrification of the Railways in Cherwell, the government's commitment to East West Rail and the new station at Water Eaton.
- Delivery of the south east link road at Bicester will be a priority.
- Alternative options to securing a University technical college should be explored as funding has not been successful at Bicester
- County Council assets at Bicester tie in with the ambitions for Bicester town centre.
- The Green Belt Review should be expanded to include land at Begbroke Science Park for employment.
- Further consideration of the importance of Oxford Airport is needed.
- The County and the District should continue to work together to develop Infrastructure plan.

- More attention is needed in relation to strategic public transport planning, transport planning at Banbury, education, and making policy wording consistent.

English Heritage

English Heritage supports the plan generally and welcomes the conservation of the Canal.

It recommends the following changes are made:

- Place more emphasis on preserving the historic environment not just the built environment. Some parts of the District are not built e.g. ANOB
- Concern is expressed about the South East link Road at Bicester
- An assessment needs to be undertaken in order to assess the roads impact and re-alignment considered. It needs to be shown that it is in public interest that it goes ahead.
- Concern is expressed over Bicester 12 and its impact on Wretchwick Medieval Settlement. Land should be excluded from the allocation that affects its setting.

Natural England

At least a phase 1 ecological survey should be undertaken for each allocated site to allow consistency with paras 110 and 165 of the NPPF. A phase 1 survey should provide a good indication of whether protected species are likely to be a constraint on a site and whether further survey work is required.

It is similarly unclear how the landscape and amenity value of each site has been considered. Unless it is demonstrated that these matters have been taken into account in the allocation process, Natural England advises that the plan is unsound.

Environment Agency

The Policy for North West Bicester is not consistent with PPS1 Ecotown supplement; not all elements of the PPS supplement have been included. If the policy is intended to future proof the local plan should the PPS be removed then all elements of the policy should be included. In particular, ecotown supplement requirements for ET17 Water (requirement for a water cycle study covering water efficiency and demand, neutrality, quality, surface water management, infrastructure requirements and delivery etc) and ET18 flood risk (development avoids, does not increase and where possible reduces flood risk and takes a sequential approach to layout- although ESD6 seeks to achieve this).

The Bicester South East Relief Road route is not marked on the proposals map for the Local plan. The route on the Bicester Masterplan indicates it crossing the Langford Brook; the impact on flood risk and nature conservation will need to be considered.

At Bicester Business Park/Bicester Gateway the use of “flood plain” and “areas liable to flooding” are too vague and make the application of para 100 of the NPPF difficult. Policy wording should be amended to read “There will be no built development within flood zones 3”

Since the permitted scheme at Bicester Business park the EA has undertaken hydraulic modelling of the watercourse and future development proposals should use the most up to date information. Whilst it does not preclude the site completely from being developed proposals might need to consider the constraints in greater detail. It would be preferable for the policy to indicate no built development in flood zones 2 and 3 as this would make

development more resilient to climate change however it is appreciated that this is aspirational and is not explicitly stated in the NPPF.

The level of detail in Canalside policy wording is inappropriate and cannot have been informed by the Level 2 SFRA. Allocating areas of the site for specific development uses would only be appropriate if supported with evidence from the level 2 SFRA. The EA will continue to work with the Council on completing the SFRA.

Regarding Southam Road Key site specific design and place shaping principles bullet point 2 does not make sense and conflicts with NPPF para. 100. It should be revised to read "There will be no built development within flood zones 2 or 3 and a green buffer will be provided along the watercourse."

Advisory: There may also be access and egress issues for residents using Noral Way, which is partly within flood zones 2 and 3. The level of risk could be assessed in a site specific FRA however there is a risk in allocating a site where safe access could not be achieved. CDC's emergency planners should be able to give a view on this.

Employment land at the M40 is supported.

Oxford City Council

Stronger reference should be inserted in the Plan to the 'Duty to Co-operate', similar to the wording proposed as a modification by the Inspector to the South Oxfordshire Core Strategy. Disagrees that "there is no suggestion at this stage that a wider review is required". The City Council will continue to press for an urban extension to the south of the city but until this is secured the City would wish the option for a selective Green Belt review in other areas around the city to be maintained.

The City Council has some concerns about the shift in the type of employment provision at Bicester e.g. to the knowledge economy as this overlaps significantly with the key sectors of the city's economy.

It is concerned that expansion at Bicester Village could seriously impact on the potential of the Westgate shopping centre redevelopment in Oxford.

Reassurance is needed that adequate infrastructure funding will be in place to mitigate the impact e.g. on the A34. A programme of measures and funding schemes should be identified to properly mitigate any additional demand arising from future housing and jobs growth.

Parish Councils

Various Parish Councils identify positive effects but generally consider there will be adverse affects from development of Banbury, Bicester and the Districts villages.