# Core Strategy Issues and Options 2006

**Appendix 1: Summary of Consultation** 

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## 1 Issues and Options Paper

In February 2006 Cherwell District Council undertook consultation on a Core Strategy Issues and Options paper.

The document set out the strategic issues facing Cherwell to 2026 and a range of options to address them. The consultation invited comments to help inform the Council's "preferred options".

#### 1.1 How did we consult?

The consultation ran for six weeks from 27 February 2006 – 10 April 2006.

#### 1.1.1 Distribution

The consultees listed in the Statement of Community Involvement were notified by letter or email and were asked to comment on the Issues and Options paper. Specific (statutory) consultees (such as parish councils, the Environment Agency, the County Council) were sent a hard copy of the document.

Hard copies were also placed at deposit locations across the district including libraries and Council offices.

The document was available to view online at www.cherwell.gov.uk

## 1.1.2 Press Coverage

Statutory notices were placed in local newspapers to advertise the commencement of the consultation.

#### 1.1.3 Meetings

Prior to the publication of the Issues and Options consultation document a workshop for internal officers was held. This workshop brought key officers from different teams together to aid the formulation of the Core Strategy's key issues, strategic objectives, and the vision for the district to 2026.

## 1.2 Responses

We received a total of **82** responses to the Issues and Options consultation. These generated a total of **1098** comments which have all been attributed to the relevant section of the document. Some responses did not state the question/s to which the response relates, and officers have taken a decision as to the applicable question. This sometimes means that the same comments are placed under a number of questions.

All responses made during the consultation period are available to view online at www.cherwell.gov.uk

#### 1.3 Sustainability Appraisal

An Initial Sustainability Appraisal Report was produced for consultation alongside the Issues and Options Paper (as well as a Technical Paper on Housing Figures, and a Spatial Report). Some comments on the Sustainability Appraisal were also made to the Core Strategy document and these are discussed in Section 2.2.

## 2 Summary of Responses to Questions

Set out below are summaries of the responses to each question. When preparing their responses Officers used the full responses. The summaries are below are a guide only, and full responses to all the questions can be viewed at <a href="http://consult.cherwell.gov.uk/portal/ldf/cs">http://consult.cherwell.gov.uk/portal/ldf/cs</a>. The full responses will also be used by officers in preparing the next stage of the Core Strategy.

#### 2.1 Introduction

### 2.1.1 Summary of Response

One response comments that it is important that the Core Strategy is rigorously considered and durable in the long term to avoid recasting policy and changing direction and emphasis in terms of the strategy and the spatial distribution of development.

Whilst another comments that there is need for a robust evidence base, integrated sustainable policies, for the Core Strategy to be 'objective led', to promote and regulate sustainable development, to protect and enhance the landscape, and to be coherent with other relevant plans and strategies.

One respondent made the comment that the role of the more sustainable Category 1 settlements should be considered (this comment was made to the Core Strategy as a whole).

English Heritage stated that the introduction should make reference to further guidance including that produced in 'Environmental Quality in Spatial Planning'

One respondent notes that the Issues and Options Paper has been published prior to the completion of an Employment Land Study, a study which should inform the Core Strategy Preferred Options.

A respondent points out that as Cherwell District Council adjoins the city of Oxford, the Local Development Framework for the district will have a material effect on Oxford's future role as one of the major cities in the South East.

Another respondent feels adequate employment, retail and entertainment should be provided on the same sites as housing to achieve the aims of PPG13.

Whilst another respondent states that the Core Strategy should not follow a competing 'option led' approach, as this could polarise attitudes.

#### Officer Response

These responses raise important points to be taken into account in preparation of the Core Strategy, particularly regarding the evidence base. At this early stage in the preparation of the Core Strategy many evidence studies are emerging or yet to be commissioned and more work is required before progressing. Some of the more general comments (i.e. the role of sustainable settlements) are responded to elsewhere in this document.

## 2.2 Sustainability Appraisal

## 2.2.1 Summary of Response

One respondent suggests the final Sustainability Appraisal should contain a full account and justification for the rejection of certain options in the development of the Council's preferred strategy.

One respondent suggests that regarding Objective 8, the following wording should be added: 'including local stone which is a finite resource and should be built so as to be easily reused as building stone in the future'.

## Officer Response

The Sustainability Appraisal appraises options and informs the LDF at all relevant stages. The SA framework contains objectives for the use of recycled materials and local products.

## 2.3 Planning Policy Context

## 2.3.1 Summary of Response

One respondent asks 'what is the relationship between the LDF and national and regional policy guidance and to what extent will they repeat each other?'

Another asks 'what is the timeframe for the Core Strategy?'

One respondent would like to know the status of the NSCLP.

One respondent asks 'what is the status of the Adopted Cherwell Local Plan 1996, which policies have been saved and why?'

### Officer Response

The comments above are brief summaries of more detailed responses, which all appeared to ask for clarification on the existing planning policy framework, and the process of preparing the Local Development Framework.

Although the Core Strategy might not be the appropriate place to explain which policies of the Adopted Local Plan have been saved, it is important to ensure that future Local Development Framework publications are reader friendly and explain the process simply to aid public understanding of the document and generate as many useful responses as possible.

## 2.4 Links to Community Plan

## 2.4.1 Summary of Response

One respondent suggests paragraph 4.5 needs to make reference to wider landscape settings rather than protecting individual buildings. There also needs to be reference to the District's registered battlefield.

Another supports the reference to high standards of design being necessary in new developments.

One of the comments received suggests that there needs to be greater emphasis on crime reduction in the Spatial Report .

It has been suggested that the Spatial Report: Appendix B; Table 1 should now include the Government's 'Securing the Future' strategy and 'The Historic Environment: A Force for Our Future' (DCMS, Dec 2001).

References to Circular 1/94 should be replaced with Circular 1/06.

## Officer Response

The 'Links to Community Plan' section summarised the links between the Community Plan and the Local Development Framework – it listed the issues arising from the Community Plan, which was published in 2002. So whilst the additional issues suggested in response to this section (i.e. the recognition of wider landscape settings) are important to consider in the Core Strategy, they cannot, through this document, be retrospectively added to the Community Plan.

The responses also highlight the need to ensure an up to date literature review is used to inform the Local Development Framework, with references to current documents throughout LDF documents.

## 2.5 Spatial Portrait

## 2.5.1 Summary of Response

One respondent suggests the Core Strategy needs to recognise the existence of major employers outside of the District's main urban areas.

Another comments that the Spatial Portrait needs to recognise the wider historic environment including locally important features and historic landscapes, for example as well as registered historic parks and gardens and the registered battlefield mentioned.

One respondent argues that some reference is made to out commuting in Bicester but more needs to be made to the more balanced and sustainable patterns in Banbury. Whilst another agrees with the reference to Banbury as the main settlement in the District which dominates the economy. Several respondents meanwhile comment that the Portrait should make specific reference to Bicester as a sustainable and appropriate location to meet some of the development needs of the District.

One respondent feels the LDF should tackle the acknowledged high levels of out commuting through allocation of new employment land in Bicester and another respondent feels the Portrait should acknowledge the importance of hotels to the economy.

A respondent suggests that what is necessary is a more robust assessment in terms of:

- The characteristics of each settlement
- The Spatial Portrait in general
- Open space and sports pitch provision

It is commented that the previously developed land issue in this section is incorrect. Previously developed land plays an important role in the current Non-Statutory Cherwell Local Plan and will play an important role in the future. The draft RSS also makes reference to it.

It is suggested that the Portrait should make reference to the contribution that school traffic makes to congestion and another respondent thinks that the impact of HGV's cutting through villages should be considered.

One respondent comments that the Portrait should consider the role of open space in detail and accessibility to it and another comments that it should make specific reference to biodiversity hotspots. Another suggests that the Portrait needs to take into account the evolving approach to biodiversity designations (SPAs and SACs). One respondent suggests the Portrait should make reference to the possibility of releasing an appropriate Green Belt site in view of the economic benefits that would arise.

Several respondents feel a more comprehensive assessment of the housing market is needed:

- The Portrait needs to consider the housing market as a whole rather than only affordable housing
- The Portrait relates to the whole population but refers only to those most in need. It needs to consider a wider assessment of the gap in affordability

One respondent feels the Portrait lacks sufficient reference to the demographic profile of the district and another respondent feels it lacks sufficient reference to education in terms of attainment and aspirations. Whilst another suggests the Portrait needs to consider wider sociological issues (and their implications) i.e. demographic change and inmigration.

One respondent has a query over why the threshold of 3,500 has been used instead of 3,000 for village population. One respondent feels the importance of Category 1 villages should be recognised within this Portrait.

Another comments that there is general support for inclusion of Spatial Portrait - it provides a consistent staring point for those wishing to participate and establishes what the LPA considers to be the condition of the area.

One respondent feels this section underestimates the existing problems in the south of Banbury.

One respondent would like to see continuation of policy with regards to the expansion of motorway service areas to be permitted (according to criteria).

## Officer Response

There are some interesting issues raised in response to this section. The Spatial Portrait was a relatively brief summation of current local circumstances, provided to establish the context for the Core Strategy. Some of the more detailed 'issues' arising from these local circumstances (i.e. the housing market, open space provision etc) were the focus of the later 'Issues' sections where questions were posed concerning how best to tackle the main issues facing the district. However there may be opportunities to more closely link the 'portrait', 'spatial vision', and 'key issues' sections to ensure that there is a more 'forward looking' thread throughout the document.

## 2.6 Key Spatial Issues

Comments on the components of a sustainable Cherwell community

Comments divide broadly into the following groups:

#### 2.6.1 Services

Some support for services to be accessible to rural areas. However, for rural settlements to be sustainable the objectives of PPS7 should be fully recognised.

#### 2.6.2 Environment

One respondent suggests there needs to be greater reference to the historic environment in terms of the inclusion of high quality built environment assets, and in terms of the character of other settlements.

One respondent feels that paragraph 6.8 should refer to "minimising" rather than "reducing" waste – also waste minimisation is not only related to climate change.

Several respondents feel there needs to be more reference to energy consumption and the difference between mitigation and adaptation. One respondent suggests a change to bullet point 5 to read "Minimise the effects of climate change through improving energy efficiency in the built environment, reducing the need to travel and minimising waste production, and prepare for the impacts of climate change by avoiding flood risk areas, resilience to increased storms and temperatures in building design and green architecture".

### 2.6.3 Housing

One respondent argues there is too much emphasis on affordable housing rather than the provision of all forms of housing (owner occupied and affordable).

However another respondent feels the reference to affordable housing is inadequate and does not reflect needs or demand, furthermore, there needs to be greater reference to monitoring in order to achieve an adequate supply and sustain the delivery of housing.

One respondent feels these components are a 'shopping list'; they are not all appropriate and there is limited emphasis on the reuse of PDL, despite government guidance.

Another respondent comments that this section fails to acknowledge that Greenfield land and opportunities can in some circumstances represent a more sustainable alternative to PDL, particularly where a Brownfield site cannot be delivered within the plan period or where its current condition may render it inappropriate for certain development types

Its is commented that there is the need for a reference to high quality housing design.

One respondent suggests that housing targets should meet RSS targets to 2026.

#### 2.6.4 General Comments

It is suggested that there needs to be greater reference to the relationship between Oxford and the smaller Cherwell settlements.

Some general support, but development strategy criteria need to be included, based upon reducing the need to travel.

One respondent feels the issues that need to be considered in terms of sustainable communities are the range of shops, services and facilities, access to public transport and other centres and the range of job opportunities.

One respondent argues that all of these components are supported, but they must be attempted within environmental limits and without endangering the District's attractiveness.

One respondent agreed with all the components listed.

## Officer Response

Many of the issues raised in response to this question were already listed in the section (service access, public transport etc) – so the comments suggest an endorsement of factors already taken into account rather than new factors not previously considered. Some of the comments suggest 'tweaking' the existing wording to make the meaning more explicit (i.e. refer to high quality housing design, rather than the existing wording of 'high quality built environment assets', or referring to 'mitigating and adapting to climate change' rather than 'minimising the effects of climate change'). These responses can be taken into account in producing the next stage of the Core Strategy.

# 2.7 Key Spatial Issues Do you agree with the Key Spatial Issues?

Comments can be divided into the following groups:

#### 2.7.1 General Comments

A respondent suggests there needs to be better linkages and integration between housing, transport and jobs.

## 2.7.2 Comments on Key Spatial Issue 1

One respondent feels there needs to be a link between residential development and convenient access to services and facilities: out commuting can be reduced by taking up employment land to keep pace with residential development.

Another respondent states that the document needs to recognise the links between health, community facilities, education, accessible transport and open space and recreation when determining sites for development.

It is also suggested that the document needs to recognise not only accessibility to services but also the quality of those services. The focus needs to be not only on convenient access but also providing the necessary supporting infrastructure.

It is commented that specific reference to the provision of adequate organised playing pitches should be made. Whilst another suggests that there needs to be more reference to adequate employment provision as necessary to reduce out commuting (particularly in Bicester).

Reference needs to be made to the Rights of Way Improvement Plan and the Rights of Way/Countryside Access Network.

There should be greater parking provision at Banbury station which may encourage more people to use public transport.

One respondent feels the transport commitment is meaningless and the Council should be committing itself not to provide accessible transport but providing sustainable transport networks and improving these networks.

Another respondent comments that reducing the need to travel can be achieved through providing convenient access to services.

#### 2.7.3 Comments on Key Spatial Issue 2

#### 2.7.3.1 Green Belt:

One respondent believes there has been no rigorous SA of the merits of accommodating growth close to Oxford and that the Core Strategy is also immature in pursuing the Oxfordshire Structure Plan 2016 Green Belt policy, which has a shorter shelf life than the imminent RSS.

A respondent believes there are circumstances where the Oxford Green Belt should be reviewed and land released on a strictly controlled basis in pursuit of wider planning and sustainability objectives. Another respondent argues that the Green Belt should be reviewed possibly in order to create new settlements. Development just outside Oxford could provide a long-term solution for Oxford without impacting on the Green Belt or on the

historic setting of the City. Whilst another suggests changing the wording to allow for release of Green Belt land where benefits would be of regional importance.

However another respondent suggests the Green Belt needs to be maintained to keep the separation of communities and that it should be made more attractive.

One respondent argues that preserving the Green Belt should not be confused with preserving the built and natural environment, as it can often the have the opposite effect by placing greater pressure on towns to become dormitories.

## 2.7.3.2 Climate Change:

It is suggested that bullet point three should be changed to "Mitigating and adapting to the effects of climate change". The respondent also feels it would be useful to list the impacts of climate change, and to develop targets to ensure that new developments are sustainably constructed.

#### 2.7.3.3 Historic Environment:

Several respondents refer to protection and enhancement and comment that:

- The fifth bullet point needs to refer to enhancement and increasing access, as well as protection
- A Conservation Area is by statutory definition 'an area whose character or appearance
  it is desirable to preserve or enhance'. This bullet point also needs to make reference
  to the importance of setting. It should read: 'Protection, conservation and
  enhancement of the historic environment and built heritage and its setting'

## 2.7.3.4 Ecological Value:

One respondent shows particular support for bullet point four.

## 2.7.3.5 General:

One respondent feels reference should be made to minimising resource use.

One respondent suggests reference should be made to the Rights of Way Improvement Plan and the Rights of Way/Countryside Access Network.

One respondent suggests an extra bullet point should be added to read "Conserve and enhance the Cotswolds Area of Outstanding Natural Beauty".

One respondent suggests the document promotes the use of locally sourced materials to reduce the environmental cost of meeting its development objections.

## 2.7.4 Comments on Key Spatial Issue 3

One respondent suggests reference should be made to the Rights of Way Improvement Plan and the Rights of Way/Countryside Access Network.

One respondent argues that there needs to be a proper analysis of the sustainability of all sites which have the potential of being of regional significance in accommodating economic growth.

## 2.7.5 Comments on Key Spatial Issue 4

One respondent suggests that emphasis should be placed on the need to make efficient use of land as this has more long term implications than securing adequate housing.

One respondent objects to the term 'adequate', they are concerned as this implies that the full needs of the community will not be met.

One respondent refers to the requirement to meet the provisions of the emerging South East Plan and suggests:

- The term 'adequate' needs to be replaced to acknowledge that the targets within the draft South East Plan should be met.
- This bullet point needs to make more explicit the need to provide sufficient housing to meet the targets contained in the emerging South East Plan and the most recent housing projections.
- This Key Issue also needs to acknowledge that some green field land will have to be utilised for development where there is not adequate Previously Developed Land.

One respondent supports the reference to Previously Developed Land.

One respondent suggests that this section needs to consider the circumstances of the city of Oxford, which is running out of land to meet housing requirements. But, another respondent suggests that it is unrealistic to disperse Oxford's growth to other settlements.

One respondent suggests the Core Strategy needs to consider the need to review settlement boundaries.

One respondent feels there needs to be proper monitoring of housing provision, housing needs, and the ODPM housing projections.

One respondent argues the affordable housing policy should not be polarised - it should not only provide for those who are homeless or who are unlikely to ever compete in the open market, but also on those who fall just marginally short of sustaining a mortgage as these people are equally vulnerable.

#### 2.7.6 Comments on Key Spatial Issue 5

One respondent suggests a need to consider increasing accessibility to town centres, particularly for those who do not have access to a car.

Another respondent argues that the creation of a sustainable settlement hierarchy should not be done in a way which causes smaller settlements to simply "fossilise". All settlements should move towards greater self-containment to reduce the need to travel for employment and services.

## Officer Response

Some of the comments support the key issues as drafted. Some of the more specific issues raised (i.e. Green Belt review) are considered elsewhere in the more detailed sections of this document. Many of the comments refer to the need to consider links between the key issues, between the sustainable location of housing, employment, services and factors such as open space, and the need to consider the sustainable provision of infrastructure. Creating links between the different topics, and considering the timely provision of the required infrastructure, is an important consideration as we progress with the Core Strategy.

## 2.8 Key Spatial Issues

In defining a sustainable settlement hierarchy, what issues should be considered in assessing the sustainability of the district's settlements?

## 2.8.1 Summary of Response

- Population size
- Available sites for development
- Education provision
- Retail provision (comparison and convenience goods)
- Distance to nearest largest town
- Public transport
- Employment opportunities
- Flood risk
- Services
- Leisure opportunities provision
- Pubs
- Road capacity
- Facilities
- Churches
- Employment opportunities outside district boundaries
- The possibility of creating a whole new settlement
- Settlement size
- Housing markets
- Community facilities
- Recreational facilities
- Historic role of settlement
- Existing categorisation in Non Statutory Cherwell Local Plan
- Oxfordshire Structure Plan allocation
- Relative roles of neighbouring settlements
- Functionality and interrelationship between settlements
- · Mobile services should be considered

## Officer Response

All of these issues will be considered to a greater or lesser extent in determining the sustainability of the Districts settlements.

## 2.9 Spatial Vision

## 2.9.1 Summary of Response

One respondent suggests that specific reference should be made to the larger villages and their potential in delivering sustainable communities and reducing the need to travel to Banbury and Bicester.

Another respondent feels the Spatial Vision is unclear and generalised and needs to show how alternative options have been examined.

Several respondents support the statement that Cherwell should maintain its rural character.

Several responses refer to the focus on Banbury, Bicester and Kidlington

- The distinction between rural Cherwell and the three centres of Banbury, Bicester and Kidlington is both contested and supported
- The classification of 'rural areas' is too generalised: the Vision should be for the whole District, not just the three largest settlements
- Local distinctiveness should be promoted in all areas not just Banbury, Bicester and Kidlington

One respondent suggests the Vision also needs to focus on the wider historic environment rather than only built heritage.

The Vision needs to make clear what 'good environmental practice' means.

One respondent suggests the Vision needs to make specific reference to out commuting and its social implications and environmental impacts.

One respondent argues that the Vision looks at the Cherwell District in isolation from Oxford, whereas there should actually be an integrated approach.

It is suggested that the Vision should refer to the potential review of the Green Belt.

One respondent suggests after the acknowledgement that growth will have occurred, the Vision should highlight where this growth has been directed, i.e. Banbury and Bicester.

One respondent feels the Vision should make specific reference to congestion.

Several comments were made relating to Previously Developed Land (PDL):

- The Vision should make specific reference to the preference for PDL
- If PDL is fully made use of, it will be necessary then to identify and build further (Greenfield) locations for growth to meet requirements, including urban extensions

One respondent argues that Banbury and Bicester should be the main locations for growth in the LDF period. If the needs of the community for a decent home are not being addressed as evidenced by demand, affordability and inadequate supply additional provision should be made.

Another believes more detail is needed with regards to the role of Bicester, its airfield and its listed buildings.

One respondent suggests the first sentence should be expanded to read 'Cherwell's communities will offer a range and choice of accessible housing and employment opportunities available to everyone and provide the social and physical infrastructure on which they depend'.

One respondent argues if there is a need to reduce reliance on the private car, we should therefore avoid development in rural areas.

One respondent suggests the principle of 'work local, think local' should be taken forward in the spatial distribution of development.

One respondent argues that a range and choice of housing should be dispersed rather than concentrated in the main urban areas. There are often reasons why people chose to live in rural areas despite the relative paucity of local services.

One respondent suggests the Vision should also consider the importance of a large scale leisure or employment development which could contribute to a vibrant local economy on a regional basis.

## Officer Response

The majority of the comments raised are in relation to detail of the vision. There is a general consensus that it is too generalised and does not go into enough depth. The comments received ask for specific reference to be made on various areas such as sustainable development, congestion problems, the historic environment, housing, leisure, employment etc.

Whilst many of these issues are covered in the vision set out in this document, we accept that the references made may be too broad at this stage.

The vision will be developed further and refined in the draft Core Strategy and will address many of the comments raised here.

## 2.10 Spatial Objectives

## 2.10.1 Summary of Response (General)

One respondent suggests that the local development context (para 8.16 onwards) should refer to the Oxfordshire Community Strategy and Partnership.

One respondent considers that all references to the Oxfordshire Structure Plan should be replaced by the South East Plan.

One respondent asks if the order of the Objectives is reflective of priority.

One respondent suggests the objectives should be linked to provide a coherent strategy.

One respondent feels that Para 8.2 is hypocritical, another respondent feels Para 8.11 is hypocritical, and another considers all of the objectives to be hypocritical.

One respondent suggests that the word 'suitable' should be defined in relation to Para 8.8.

## 2.10.2 Summary of Response (Objective 1)

One respondent considers that development should be carefully sited so as to reduce the need to travel to larger urban areas in accordance with PPG13.

One respondent suggests there should be greater parking provision at Banbury station to encourage the use of public transport.

One respondent argues that development should be located with regard to the accessibility of the site to health and community facilities, education and infrastructure. This is consistent with policy advice at all levels.

One respondent suggests that objective 1 should also make reference to good quality, accessible housing and employment opportunities.

## 2.10.3 Summary of Response (Objective 2)

The Highways Agency supports policy that aims to reduce the number of trips made using private cars.

One respondent argues that planning cannot reduce dependency of choice to use the private car and therefore should only provide viable alternatives.

## 2.10.4 Summary of Response (Objective 3)

One respondent feels that this objective should make reference to the possibility of reusing buildings as well as land.

One respondent suggests a mixed use development approach should be taken to ensure that developments are sustainable in terms of transport.

One respondent supports the emphasis on PDL to meet development needs.

One respondent objects to the term 'underused land' as they feel this could lead to inappropriate over development.

Respondents made the following comments in relation to Greenfield land:

- Spatial Objective 3 should make reference to the need for green field housing land to meet housing requirements to respond to the advice in PPG3 and PPS3
- Significant green field land release (in the most appropriate and sustainable locations) seems inevitable as the supply of readily available PDL will not be sufficient

## 2.10.5 Summary of Response (Objective 4)

One respondent suggests the increase in the provision of playing pitches would enable the objectives of this element of the Core Strategy to be met.

One respondent raised a query over the use of the term 'of value'.

One respondent suggests objective 4 should read "To protect, enhance and expand .....", as this would be consistent with PPS7.

One respondent feels there should be reference to the encouragement of sustainable transport methods as a means of managing climate change within this issue.

## 2.10.6 Summary of Response (Objective 5)

One respondent asks 'what does local distinctiveness mean' and 'will the Council provide additional guidance'.

## 2.10.7 Summary of Response (Objective 6)

One respondent suggests deleting the wording 'where appropriate' as the inclusion of robust criteria based development control policies within the LDF will be sufficient to determine the 'appropriateness' of the individual proposals.

One respondent suggests making reference to reducing resource consumption/sustainable use of resources as per the Structure Plan to include broader waste management issues.

One respondent feels it should make reference to sewer flooding, and minimising the risk to people from sewer flooding.

#### 2.10.8 Summary of Response (Objective 7)

One respondent argues that Banbury has already lost too many important historical buildings and therefore, buildings in any category of listing should be improved and enhanced and also put to new uses rather than demolished and used as a Brownfield site.

One respondent suggests including the following wording in the Spatial Objectives "Conserve and enhance the Cotswolds Area of Outstanding Natural Beauty".

One respondent suggests text should also be included to state the need to maximise opportunities for creating habitats as well as conserving and enhancing existing features.

One respondent asks 'would this objective not include reference to making efficient use of land' and 'does it refer to ecological rather than biological resources'.

#### 2.10.9 Summary of Response (Objective 8)

One respondent suggests that development should be located in urban areas with the most sustainable transport options, rather than reviewing the Green Belt boundaries.

Another respondent argues that Green Belt should be reviewed in the light of the Structure Plan Panel's Report and of the RSS process.

One respondent suggests that a proper Sustainability Appraisal should be undertaken to assess the performance of selective releases of the Green Belt.

One respondent feels that reviewing the boundaries could identify a pattern of sustainable development, which could meet possible future development needs.

One respondent argues the existing boundaries are too tightly defined as new development in existing settlements has already encroached into the Green Belt. Therefore small scale reviews in exceptional circumstances may be necessary.

Another respondent suggests that not reviewing the Green Belt boundary will lead to a worsening gap in what the market can afford and what the market provides. Small scale reviews will facilitate affordable and market housing to meet local housing needs.

### 2.10.10 Summary of Response (Objective 9)

One respondent comments that it is not possible to 'recession proof' the District?

One respondent argues that in order to provide a sound local economy, sufficient quantities of housing need to be provided where people want to live.

## 2.10.11 Summary of Response (Objective 10)

One respondent wishes to see a balance between the provision of homes and employment, either through the strategic co-location of development sites or through the identification of sites with the potential for mixed use.

## 2.10.12 Summary of Response (Objective 11)

No comments.

## 2.10.13 Summary of Response (Objective 12)

One respondent suggests that when assessing the sustainability of tourism development, transport implications should be considered.

## 2.10.14 Summary of Response (Objective 13)

One respondent feels that the Objectives are not based on the guidance in PPG3 and draft PPS3. Objective 13 is too restrictive and is not based on assessment of housing markets, affordability and demand. The South East Plan is not a sound basis as it is currently in its draft form and has received a significant level of objection in relation to housing targets.

One respondent suggests the principal aim of the LDF should be to ensure that sufficient land comes forward over the plan period to allow for the delivery of housing requirements set out in the County Structure Plan and the South East Plan. It should therefore read "To ensure that sufficient available land, premises and sites can be brought forward over the plan period to 2026 to deliver the housing requirements of the Oxfordshire Structure Plan 2016".

One respondent feels the timescale of the SE Plan should be reflected in the Core Strategy and so Objective 13 should refer to the delivery of housing requirements for the District up to 2026.

## 2.10.15 Summary of Response (Objective 14)

One respondent feels that it needs to be stressed that affordable housing should be of a high standard.

Another respondent feels that this objective is unreasonable as the provision of affordable housing should be based on an up to date, comprehensive housing requirement study.

## 2.10.16 Summary of Response (Objective 15)

One respondent feels that specific reference should be made to the need to provide adequate housing in rural areas in order to enhance their sustainability credentials.

Several respondents support this objective, but there needs to be a commitment from the Council to promote a satisfactory level of housing.

### 2.10.17 Summary of Response (Objective 16)

Several respondents support the mentioning of sustainable communities, but criticises that they are only mentioned in a limited context.

General support for the recognition that settlements do interact and they should not be judged in isolation.

One respondent suggests the objective should make reference to the networking of settlements according to sustainable transport nodes.

One respondent feels the objective should make reference to the sustainable settlement hierarchy, with Banbury at the top.

## 2.10.18 Summary of Response (Objective 17)

One respondent suggests an additional objective should be added: 'To maintain and enhance the role of Banbury as the principal urban area within the District and the location of a wide range of jobs, services and housing opportunities'.

## 2.10.19 Summary of Response (Objective 18)

No comments.

#### 2.10.20 Summary of Response (Objective 19)

Several respondents support this objective because this may potentially reduce the need to travel to large urban areas.

#### Officer Response

We received comments about general formatting and the structure of this section. Comments also highlight the need for accurate references and clear definitions. These 'housekeeping' issues will be addressed in the Draft Core Strategy. A comprehensive structure/format is being considered and the Draft Core Strategy is likely to be organised into clear geographic areas and general topic areas.

The majority of the comments received relate to the detail of the various objectives. Many suggest that objectives need to be expanded to incorporate various detailed matters. We agree that some of the objectives are too broad and vague within this document and we will develop them further in the Draft Core Strategy.

Whilst we agree that some objectives need further detail, most of the suggestions made are considered too detailed for inclusion within this section. The objectives are there as a guide, to help set out the detailed policies to fulfil them. Hence the detail policies will contain many of the points raised by respondents and it is not necessary to repeat them in the objectives section.

In response to comments proposing the *revision of the Green Belt boundary* be included as an objective. The South East Plan did not identify a need for a strategic review of the

boundary within our district; therefore it was not identified as a strategic objective in this document.

Objective 12 to encourage sustainable tourism development to raise the profile of North Oxfordshire is no longer considered a strategic objective following this publication. The South East Plan did not identify Cherwell as a location where major new tourist development should be directed and the Council's own Tourism Study 2008 highlighted that tourism was not as great a part of the local economy than for other areas. For these reasons this will no longer remain a strategic objective however other policies within the Draft Core Strategy and the later Delivery DPD will address issues relating to and encouraging sustainable tourism development.

## **2.11 Key Issue 1**

The need to ensure convenient access to services and facilities

## 2.11.1 Summary of Response (General)

One respondent feels that the Key Issue should have been more in line with PPS; with reference to development that should contribute to the creation of safe, sustainable, liveable and mixed communities with good access to jobs and key services for all members of the community.

Approaches are generally supported although this issue needs to consider access to a wider range of facilities. E.g. employment, town centres, health and community.

Two respondents suggest that development strategies should take full consideration of opportunities to reduce the need to travel.

In relation to Para 9.52, one respondent comments on the high amount of out commuting by private car which causes congestion on the A34 to Oxford.

In relation to Para 9.66, one respondent disagrees with this paragraph.

One respondent suggests that reference should also be made in para 9.84 to Cherwell's transport problems and how these are to be tackled.

Para 9.41: Aren't RTS policies being integrated in the RSS?

Para 9.44: Might also note that Oxford is a 'hub'.

Para 9.44: The M40 does not act as a regional spoke, the railway network and A34 do.

One respondent feels the Council should ensure that its policies are sufficiently flexible to react to and reflect the roles its town centres play within the locality and wider region.

One respondent argues that a new policy should be added to this chapter entitled 'Utilities Development'. Demand side measures will not be sufficient to meet the future demand for water and so supply will need to be increased.

In relation to Planning Contributions, the following comments were made:

- The issue of planning contributions for community, transport and infrastructure is not considered within the document
- The DPD should better consider the issue of planning contributions in terms of the potential timing and means of delivery of infrastructure. It should distinguish between that to be achieved via planning permissions and that by other means, but in terms of monitoring it may need to consider delivery

Comments were also received by the Government Office in relation to the Planning Gain Supplement.

One respondent feels that reference should be made to the potential to provide a new railway station at Shipton upon Cherwell to improve intra regional connectivity.

One respondent suggests that it should be explicit that developments should be conditional on adequate infrastructure provision.

## 2.11.2 Summary of Response (Key Issues 1A)

## **Key Issue 1A**

In seeking to assist in securing appropriate health and social care and community facilities, which of the following should the Council consider?

(note, the options were not posed as mutually exclusive; respondents were asked to select as many as applicable)

#### 2.11.2.1 General:

Many respondents made comments about the need to reduce travel generally:

- New community facilities should be carefully sited so as to reduce the need to travel to larger urban areas
- Community facilities should be located closest to existing services, where they easily serve the largest population with the least need to travel
- Locations should be accessible by all non-car modes, reducing reliance on the car and the need to travel.

One respondent makes a comment about the need to ensure that planning obligations are reasonably related in scale and kind to the development proposed.

One respondent feels the viability of existing facilities, particularly in the smaller settlements, should be focused upon rather than securing new facilities in the ways suggested.

One respondent argues that health issues can be related to physical access rather than social condition and positive planning can be used to secure benefit.

One respondent feels that the objectives are only aspirations and are not achievable

## 2.11.2.2 Option 1

## Key Issue 1A - Option 1

Seek to retain and support new community facilities and improvements to existing community facilities in appropriate locations that play an important role in the social infrastructure of Cherwell

No comments.

## 2.11.2.3 Option 2

## Key Issue 1A - Option 2

Seek to promote, retain and support new health and social care facilities and improvements to existing health and social care facilities in appropriate locations where they will be of benefit to Cherwell's communities

No comments.

## 2.11.2.4 Option 3

## Key Issue 1A - Option 3

Seek to ensure that new and/or improved services and facilities are planned and integrated in new development in locations that are accessible by good public transport and non car modes for all users

One respondent supports this option (no details)

One respondent supports all the options; however, Option 3 should be amended to ensure the option states that development 'will meet identified needs'.

One respondent supports the need for accessibility to existing services and facilities as well as accessibility by non car modes. They also suggest that bullet point three should acknowledge that consideration needs to be given to the location's accessibility to existing services and facilities as well as accessibility by non car modes.

## 2.11.2.5 Option 4

## Key Issue 1A - Option 4

Seek to identify areas of the district in need of regeneration to address the physical and social elements that contribute to poor health

No comments.

## 2.11.2.6 No Option Preferred

One respondent feels that a range of options is necessary: retaining facilities in appropriate locations, ensuring new facilities are provided within new development schemes and ensuring that new facilities are provided by the appropriate authorities where deficiencies exist.

One respondent expressed support for Options 1, 2, and 3

One respondent expressed support for all four options.

#### 2.11.3 Summary of Response (Key Issues 1B)

### **Key Issue 1B**

In seeking to assist in improving education within Cherwell, which of the following should the Council consider?

(note, the options were not posed as mutually exclusive; respondents were asked to select as many as applicable)

#### 2.11.3.1 General

One respondent feels the focus needs to be on both new facilities and expanding existing facilities. New facilities will need to be located according to guidance in PPG3. Urban locations are the most sustainable locations, other than sites within urban areas.

One respondent argues that locations should be based on a robust evidence base which shows the existing projected capacity of education establishments within the District and population increases to project demand. Education facilities should be accessible to the catchment population.

Two respondents suggest that provision of education facilities should be related in scale and kind to the type of development proposed. Development should be located in locations that are easily accessible to existing education facilities.

One respondent commented that existing educational infrastructure should be used rationally, recognising the value that the community places on local schools.

One respondent comments on the vague wording of the issue, it should read "In assisting improvement of..."

## 2.11.3.2 Option 1

### **Key Issue IB Option 1**

Support development of existing educational facilities to promote higher educational achievement and improved skills for all learners

No comments.

### 2.11.3.3 Option 2

### **Key Issue IB Option 2**

Seek the provision of new or expanded educational facilities to serve new developments where need can be demonstrated

One respondent feels that more clarity should be provided to the development industry and asked 'what constitutes a major development'.

## 2.11.3.4 Option 3

## **Key Issue IB Option 3**

Ensure that new and/or existing educational services are located where they will be accessible to all users and encourage travel by walking, cycling and public transport

One respondent expressed support for this option.

In relation to reducing school traffic congestion, one respondent suggests the text should be changed to read "Ensure that new or expanded educational facilities". This option is supported as it would reduce school traffic congestion and reduce the need to travel long distances to key facilities.

## 2.11.3.5 Option 4

## **Key Issue IB Option 4**

Ensure that new facilities are planned within major developments, they are fully integrated, and their provision is phased as appropriate.

No comments.

## 2.11.3.6 No Option Preferred

One respondent supports option 1, 2, and 3.

Two respondents support all of the options.

## 2.11.4 Summary of Response (Key Issues 1C)

## **Key Issue IC**

In seeking to deliver accessible transport in Cherwell, which of the following options do you consider that the Council should pursue?

#### 2.11.4.1 General:

One respondent argues that all developments will result in some form of commuting- if a development does not present an unacceptable increase then it should not be hindered.

One respondent feels that consideration should be given to the need to make the rail network more attractive to users, such as creating a safe environment for parked cars.

One respondent comments that there is no other mechanism of reducing out commuting other than reducing the supply of housing, which would significantly disadvantage local people. Measures should therefore be introduced to reduce congestion.

Another respondent comments that LDF policies should recognise that transport infrastructure should be planned, integrate transport and development policies, promote walking and cycling, promote quiet lanes and greenways, and require landscape character assessment of proposals where appropriate.

## 2.11.4.2 Option 1

## **Key Issue IC Option 1**

The Council should seek to ensure that the current level of car use is not increased above existing levels, in particular the levels of out commuting currently experienced from main urban areas, and that existing patterns of public transport and non car modes are maintained.

There was one comment of undetailed support for this option.

## 2.11.4.3 Option 2

## **Key Issue IC Option 2**

The Council should seek to reduce existing levels of car use, in particular the levels of out commuting currently experienced from the main urban areas, and ensure that non car mode patterns of travel are improved through the promotion of public transport and other sustainable modes of travel.

One respondent suggests that new employment allocations should be made at Bicester for local residents. The links between Spatial Objectives 10 and 11 should also be made more explicit in the supporting text to this issue.

One respondent supports Option 2 in line with government guidance. However, they feel more detailed analysis should be made on how Cherwell can realistically reduce the need to travel (out commuting in particular).

One respondent argues that if you create a balance between housing and the supply of employment, this will avoid the creation of additional travel between work, home and other facilities.

One respondent feels the Council should go further than just maintaining existing levels of car use. It should work together with the County and other District Councils to limit growth in traffic levels and increase public transport usage.

Another respondent suggests that promoting public transport would better meet Spatial Objective 2 and would improve transport choices.

One respondent comments that the Council could seek to reduce the levels of long distance out commuting (>5km).

One respondent feels this issue should be more specific about improving public transport within and between towns in Cherwell and other Districts.

There was one comment of support for this option (relating to the promotion of a particular site)

There were four comments of undetailed support for this option.

### 2.11.4.4 No Option Preferred

Two respondents suggest that the reductions in car use proposed are unreasonable expectations of the Core Strategy:

- However, new developments should encourage less car usage
- The aims are impractical- what should be done is to make the public transport system as attractive to users as possible. A central transport interchange in Bicester is recommended

One respondent is concerned that there seems to be a lack of mention of rural settlements and their transport issues.

Two respondents comment that a hybrid of these options and others is recommended. There must be an integrated approach between land use planning and transport. Development should be accessible to travel modes other than the private car and so eventually bring about the reduction of car use. It is unreasonable to guarantee a reduction in car use.

Another respondent suggests an added option 3, which seeks to limit out commuting by ensuring that local employment matches housing developments.

## 2.11.5 Summary of Response (Key Issue 1D)

#### **Kev Issue 1D**

Which of the following do you think are key recreation issues for the district?

- Protecting existing areas of open space
- Securing new recreation provision to address existing deficiencies
- Improving/enhancing existing provision
- Increasing participation in recreational activity

#### 2.11.5.1 General:

One respondent feels stating that new development should make adequate provision for open space, sport and recreation is inadequate and fails to recognise the complex issues in the provision of and subsequent management of formal sports facilities. Simply allocating land for recreation, open space or formal sports provision does not secure the facility and its on-going management.

One respondent suggests that better use should be made of school playing fields out of term time.

One respondent comments that as part of a comprehensive redevelopment strategy for Bicester Airfield, there are opportunities to provide recreation space to meet the need generated by the development.

One respondent supports the second issue. They state that it is clear that no regionally significant leisure facility exists and there are clear benefits arising from the establishment of such a facility.

## 2.11.5.2 Option 1:

Six representations were received supporting option 1 "protecting existing areas of open space" (five of which supported all four options).

One respondent feels that some areas of open space should be protected. Development of open space should not be prohibited where an area of open space of equal or higher value to that lost due to the development is provided as part of the development or where it can be demonstrated that significant benefits could result from the redevelopment for the site for another use.

One respondent comments that new development should not be expected to make additional provision to address existing deficiencies. Contributions from new developments should be directly related to the development.

One respondent feels that areas of existing open space should not be protected if they perform no function within the community or are of no value. Consideration should be given to the benefits of replacing unsatisfactory space with space that is better located or better able to function efficiently and effectively. The option should be re-worded to read "protecting existing areas of important open space".

#### 2.11.5.3 Option 2:

Five representations were received supporting option 2 together with the other options (referred to under "No options" below).

#### 2.11.5.4 Option 3:

There was one comment expressing undetailed support.

Six representations were received supporting option 3 "improving/enhancing existing provision" (five of which supported all four options and are referred to below).

#### 2.11.5.5 Option 4:

Six representations were received supporting option 4 "increasing participation in recreational activity" (five of which supported all four options).

## 2.11.5.5 No Option Preferred:

One respondent suggests that a combination of measures will be appropriate to secure the appropriate quantity and quality of open space and recreation provision. The provision of open space and recreational facilities should be made according to local circumstances.

Five representations supported all four options.

One representation promoted a specific site.

#### 2.11.6 Summary of Response (Key Issue 1E)

#### Key Issue 1E

Do you consider that there are other key recreational issues for the district?

One respondent suggests that improving access to the countryside should be included as an issue in the Core Strategy.

Another respondent feels that accessibility to existing facilities and provision, and a choice and range of sports and commercial leisure and recreation activities should be included as issues in the Core Strategy.

One respondent suggests that a multipurpose sports complex in the middle of the District should be considered to negate more local demands by people with vested interests.

Another respondent suggests that the District would benefit from a significant leisure facility with a regional or national catchment.

### Officer Response

There is general support for the options proposed and a view that all the options were important. The integration of planning and transport and working with other organisations/providers were highlighted as important. These considerations will be reflected in the Core Strategy.

The provision of some services and facilities is the responsibility of other organisations such as the County Council. However the Core Strategy can play an important role in contributing towards provision and accessibility. The Council works with other organisations to ensure services, utilities and infrastructure are supported or provided to meet local needs. The Core Strategy seeks to locate development in places where all the services and facilities mentioned above are as accessible as possible, including by means other than the private car, and to ensure they are supported. The Sustainability Appraisal of the Core Strategy ensures the most sustainable choices are made in the Core Strategy. To provide evidence a number of studies have been produced including for recreation and open space and transport.

Existing services, facilities and infrastructure can be supported or new ones sought through developer contributions. The Council will monitor the progress of development and the provision of these agreed in the legal agreement between the Council and developer. The Core Strategy sets out how services, facilities and infrastructure will be provided and the Council is producing a Planning Obligations SPD where requirements for contributions are set out in more detail.

Matters raised in relation to accessibility to employment and town centres are addressed in responses to representations to Key Issues 3, 4 and 5.

## 2.12 Key Issue 2

The need to protect and enhance Cherwell's built and natural environment

## 2.12.1 Summary of Response (General):

#### Green Belt

One respondent states that it is assumed that as part of the evidence base the Council will be able to demonstrate that it will be possible to accommodate all likely required development within the authority over at least the plan period and hence there is no need to revise the location and extent of the green belt at this time.

One comments that the capacity of Oxford to accommodate further development within its boundaries must be a key consideration in terms of review. See SE Plan for guidance on this issue. The Green Belt needs to be positively managed to make it attractive rather than just maintaining it.

One respondent argues that the Oxford GB is being given far too much priority to the detriment of other areas.

## Historic Environment

One respondent comments that there needs to be wider consideration of the historic environment in paras 10.54, 10.55 and 10.60. Reference also needs to be made to the positive relationship between the historic environment and development, for example in terms of regeneration and sustainable development.

One respondent suggests that the historic environment should consider not only statutory designations, but also the setting of cultural and heritage assets in Cherwell.

GOSE refer the Council to an appeal decision which discusses the limits of lists of locally important buildings.

#### Ecology

One respondent feels that the introduction section should make reference not only to the Otmoor RSPB site but also the SAC, SSSIs, LNRs, or local SINCs.

One respondent feels that reference also needs to be made to the potential for new development to protect, maintain and enhance important wildlife habitats. New development can actually contribute to the creation of new open space.

One respondent comments that the opportunity areas for biodiversity in the Draft SE Plan are only in draft form; reference also needs to be made to the more detailed and locally focused mapping of target areas for biodiversity across Oxfordshire by the Thames Valley Environmental Records Centre (TVERC) (and also to include these maps). Targets for these areas could then be included in the Core Strategy. Additionally, all land use policies should be consistent with the strategic objectives for biodiversity conservation (PPS9).

## Landscape

One respondent suggests that reference should be made to the Cotswolds Area of Outstanding Natural Beauty in paras 10.1 and 10.43.

Additionally, paragraph 10.52 should propose to only encourage tree planting and community woodlands where this would be in accordance with local landscape character.

One respondent comments that the Cotswolds AONB needs to be protected from inappropriate development. Also, the Council should carry out a Landscape Character Assessment. In the absence of an LCA, policies should be based on an understanding of landscape character. SPDs could also be used to provide character analysis at an appropriate level of detail or to set out the Council's views on sustainable development.

#### Water

One respondent comments that to accord with guidance in PPS12 and in the Council's Core Strategy Sustainability Appraisal, a detailed policy should be included in the Core Strategy to ensure that all new development incorporates water conservation and energy efficiency measures. The Council should also seek to ensure that there is adequate water supply, foul drainage and sewerage treatment capacity to serve all new developments.

#### Recreation

One respondent feels that the built and natural environment could also encourage health and welfare improvements by providing recreation and tourism facilities (link to Objectives 1, 3 and 12).

One respondent suggests the LDF should promote a spatial countryside recreation framework. It should:

- Meet a range of needs
- Allow easy access to countryside recreation
- Promote the management of recreation opportunities
- Recognise the need for formalised rural recreation
- Include policies to protect and promote recreation and amenity for existing or potential inland water areas

One respondent suggests that the LDF policies should ensure that existing rights of way are protected, identify potential for new or improved recreational routes, and recognise links to other documents and policies.

#### Desian

One respondent feels that development should enhance local distinctiveness and contribute to a sense of place by identifying areas to be protected, with a Design Guide SPD, using development to restore and strengthen areas where local distinctiveness has been lost, and promoting good design, well integrated into the existing urban form, and creating an appropriate mix of uses.

## Other

One respondent suggests the LDF should contain policies which promote countryside/green space management; promote and expand networks of green spaces etc; conserve attractive landscapes and enhance damaged ones; consider new opportunities for rural-urban initiatives. Also, Area Action Plans should be used to focus attention on particular areas.

One respondent argues that the LDF should promote the reduction of new mineral working through encouraging the use of recycled and alternative construction materials and national waste strategy principles.

#### Officer Response

A range of responses were made to this section as a whole (and are therefore labelled as 'general' comments) and many of these relate to issues raised against individual questions, responded to below. These general responses highlight the kinds of issues that will need to be considered in the Core Strategy, some of which could be covered in

more detail in the next stages of the Core Strategy, including protecting and enhancing a green infrastructure network for recreation and biodiversity benefits. Water efficiency was also not discussed in much detail in the Issues and Options paper, and this could be considered further in the next stage.

## Core Strategy Issue 2A

The Council considers that in accordance with emerging regional planning policy there are no exceptional circumstances to necessitate a strategic review to the Oxford Green Belt boundary.

What approach do you think the Council should take towards small scale local reviews of the Oxford Green Belt boundary?

Option 1: There are no exceptional circumstances to necessitate small scale local reviews of the Oxford Green Belt boundary.

Option 2: Small scale local reviews of the Oxford Green Belt boundary may be appropriate in exceptional circumstances.

## 2.12.2 Summary of Response (Key Issue 2A)

#### 2.12.2.1 Option 1:

One respondent supports this option because it is important to protect the character and integrity of Oxford City. A review would contribute to congestion problems within Oxford and outside of it. Additionally, they comment that there is no need to develop within the Green Belt, as sustainable settlements can be found elsewhere.

One respondent comments that the Oxfordshire Structure Plan does not identify a need for such review and there is no evidence to support small scale review.

One respondent is worried that one initial review would set the precedent for subsequent reviews.

One respondent argues that there is no need for a review since the needs of the District can be fully met from sites within or adjoining built up areas.

Two respondents express undetailed support for this option.

#### 2.12.2.2 Option 2:

There were four comments of undetailed support for this option.

One respondent feels there is potential for land to be reasonably released from the Green Belt on a strictly controlled basis, in pursuit of wider planning and sustainability objectives. This is in accordance with PPG3. There is the potential for review particularly within the A34 corridor.

Another respondent suggests there is potential for review to the north of Kidlington.

One respondent comments that Oxford is a sustainable location for growth as it provides good jobs and good public transport (transportation, accessibility and employment development reasons).

One respondent believes that existing boundaries are too tightly defined and so need reviewing.

One respondent argues that a review is needed to respond to exceptional circumstances (i.e. exceptional need for local housing).

Another respondent feels that boundaries are too restrictive and do not allow for exceptional local circumstances such as high house prices and increasing affordability problems for local residents.

One respondent comments that existing boundaries do not allow for exceptional local circumstances such as the need for affordable housing and particular local housing needs.

One respondent believes that a review is necessary in line with the RSS.

Another respondent feels that reviews are necessary in order to contribute to sustainability objectives such as greater self containment, and providing people with the opportunity to live in an area of their choice at a price they can afford.

One respondent suggests that as part of the review (which they consider to be necessary), the Council should draw new boundaries around settlements to allow them to grow in a sustainable manner during the plan period.

One respondent feels the Core Strategy is an appropriate time to consider a review of Green Belt policy. It would be wrong of the local planning authority to set its face against at least considering such reviews. The consideration of exceptional circumstances can only come through the development process.

## 2.12.2.3 Alternatives Suggested:

The approach should be based on the finalised regional policy (various).

The approach should be based on the last Structure Plan review.

One respondent suggests that no development should be permitted in rural areas as sustainable transport options are so limited.

Another respondent feels that exceptional circumstances are still too restrictive and do not take into account the great economic benefits that can be accrued by developing within the Oxford Green Belt boundaries. (This is connected with a site specific representation promoting development at Shipton on Cherwell guarry).

The options are too limited; there should be an option for significant development in the green belt.

## Officer Response

Overall, Option 2, which referred to small scale review being appropriate in exceptional circumstances, appeared to receive the highest number of comments and the most support. This approach is in accordance with the national policy context. However, the consultation responses did not identify significant evidence regarding what these circumstances are and in which locations. At this stage, the Council does not consider that any exceptional circumstances exist. However, the South East Plan has yet to be finalised and, depending on the outcome, it is possible that there will be a need to review the situation.

## Core Strategy Issue 2B

What do you consider are the main problems facing the urban fringe areas within Cherwell? (no options given)

## 2.12.3 Summary of Response (Key Issue 2B):

Continued development pressures and lack of long term planning for urban fringe areas has in many cases undermined their potential.

One respondent refers to difficulty of providing a transitional area between those areas which are clearly urban in nature as opposed to those areas which are clearly agricultural (the poor relationships between urban areas and the rural hinterland). Whilst landscaping initiatives may help, they suggest that new developments could provide an improved gateway between the two.

One respondent comments that there is currently a lack of accessibility to rural areas, which can provide an important recreational resource. Urban fringes could be developed as gateways between the two.

One respondent agrees that new developments can play a part in increasing accessibility to the rural fringe, and in providing resources for ongoing management and maintenance.

One respondent argues that the main problem is erosion – development is leading to the loss of irreplaceable green spaces and habitats and the merging of settlements.

Another respondent argues there is a need for careful management to reduce reliance on private car in urban fringe settlements.

One respondent argues that it is not economic to farm urban fringe areas and so they become abandoned; these areas need positive management.

Another respondent discusses the issue of underused land and comments that Bicester Airfield is surplus to requirements and needs a sustainable future based on comprehensive regeneration to ensure that land is effectively used and key buildings retained.

One respondent suggests a number of problems facing the urban fringe areas:

- Urban sprawl
- Unappealing commercial development (e.g. warehouses)
- Neglect
- Encroachment on urban fringes from within and from surrounding villages
- Speculative development applications within the urban fringe

Another respondent argues that development in urban fringe areas is not appropriate and suggests that Green Belts need to be established around villages close to towns.

One respondent comments that the urban fringe should not be an artificial or manufactured countryside.

## Officer Response

Responses to this question overlapped with Question 2C (What option should the Council adopt in seeking to protect and enhance the urban fringe areas?) There appears to be no clear agreement between consultees on the existing problems facing urban fringe areas, or in the approach the Council should take. Some comments seem to suggest that it is

new development which harms the urban fringe, whilst others suggest that new developments could help solve the problems. Some people suggest that lack of positive management is the problem, whilst others comment that the countryside should not become artificial or manufactured. Many comments identified that there is however some potential to improve urban fringe areas, with one respondent highlighting the opportunity provided by urban fringe areas in providing an accessible gateway to the countryside. Clearly, the interface between built development and open farmland is important in determining the impact the urban area has on the character of the countryside. There will also be a need for some new development to be accommodated in the urban fringe. The Core Strategy will need to consider appropriate landscaping of existing and proposed development, including new areas of woodland planting and hedgerows. Development proposals also need to incorporate areas of open space, improved links between urban and rural areas, protection and enhancement of green corridors, and high quality design to produce gateway developments particularly on land adjacent to major transport routes.

# **Core Strategy Issue 2C**

In seeking to protect and enhance the urban fringe areas which option should the Council adopt?

Option 1: The Council should maintain the current approach to urban fringe areas.

Option 2: Subject to adequate resources being secured, the Council should be more proactive by formulating a strategy to enhance the role of urban fringe areas.

### 2.12.4 Summary of Response (Key Issue 2C)

#### 2.12.4.1 General:

One respondent suggests that urban fringe areas can be utilised to meet development requirements, as can rural fringe areas in the larger, more sustainable rural settlements.

Another respondent argues that urban fringe areas are more sustainable than greenfield locations, and so they should be utilised for development.

One respondent comments that more reference needs to be made to PPG3 and the sequential approach to development. Settlement boundaries may need to be reviewed to accommodate development and urban extensions are identified in PPG3 as the second most sustainable locations for development.

One respondent reiterates their response to Question 2B above, that urban fringe areas should not become an artificial or manufactured countryside.

#### 2.12.4.2 Option 1:

One respondent supports Option 1 based on advantages of the Council's existing approach: development should be permitted in urban fringe areas as these may represent more sustainable locations for development. Large urban fringe extension sites can incorporate large areas of public access recreational space and can provide links between the urban and more rural areas. Through the development of urban extensions, the Council is able to actively influence the role of urban fringe areas.

One respondent supports Option 1 based on the policy guidance. They argue that it is inevitable that urban fringe areas will have to be utilised as PDL in core urban areas dwindles. Not permitting development on urban fringe areas would redirect growth to less sustainable locations. A further urban fringe policy would be unnecessary as the Council could not actively influence the enhancement of urban fringe areas any more than it already does.

### 2.12.4.3 Option 2:

One respondent supports option 2 provided that this does not cause environmental damage.

There were four comments of undetailed support for this option.

One respondent objects to this option and the reference to resource availability. They comment that neither of the options is suitable as urban fringe areas should be maintained and improved to achieve sustainable development.

## 2.12.4.4 Alternatives Suggested:

One respondent comments that neither option is appropriate, as urban fringe areas represent sustainable locations for development. Urban fringes, particularly around Bicester, offer a deliverable supply of land for the life of the LDF. Reviews of settlement boundaries may identify sustainable locations for development in line with PPG3.

One respondent suggests that a more protective policy should be used. Green Belts around villages close to towns should be used to retain attractive landscapes for conservation purposes.

Another respondent makes a similar comment and suggests a tight urban edge should be maintained at all times to strictly phase developments and to keep existing settlements separate.

### Officer Response

Support was expressed for both options, but the majority of representations acknowledge that urban (and village) extensions will have to be accommodated and should be used to improve the urban/rural fringe area through incorporating areas of open space and providing links between urban and more rural areas. The preferred policy approach is intended to reflect these concerns, setting out the framework for protecting and enhancing the urban fringe, and ensuring that, where development is required, benefits to the urban fringe are secured.

#### Core Strategy Issue 2D

Which of the following measures of seeking to reduce the impacts of climate change and the use of fossil fuels do you consider as having most potential for Cherwell District:

- a) short rotation coppice
- b) wind energy
- c) landfill gas
- d) municipal solid waste combustion
- e) solar photovoltaics
- f) passive solar gain; or
- a) bio-fuel

#### 2.12.5 Summary of Response (Key Issue 2D)

### 2.12.5.1 Comments about individual sources of renewable energy

2 representations expressed support for short rotation coppice, with one qualification that this should be in small areas and in small quantities.

3 representations expressed support for wind energy.

1 representation objected to wind energy.

- 4 representations expressed support for landfill gas, with the qualification that this should be in appropriate locations.
- 3 representations expressed support for municipal solid waste combustion. One comment was made that municipal solid waste combustion is the responsibility of the County Council.
- 6 representations expressed support for solar photovoltaics.
- 3 representations expressed support for passive solar gain.
- 1 representation objected to biofuel, remaining unconvinced about its sustainability credentials.

#### 2.12.5.2 General:

- 2 representations required more detail on the different types of renewable energy suggested.
- 1 representation stated that Core Strategy policies should be based on the policies of the Oxfordshire Structure Plan (2016).
- 3 representations were made suggesting alternatives as follows: district heating systems (1), micro hydro power (1), geothermal power (1).
- 4 representations stated that the Core Strategy should recognise the benefits of all sources of renewable energy, and should not therefore limit the potential to particular sources.
- 1 representation stated that this issue should be considered on a site by site basis.

#### Officer Response

It is agreed that planning policy should recognise the benefits of all sources of energy. The existing policy guidance (in Planning Policy Statement 22: Renewable Energy, the draft South East Plan and the Oxfordshire Structure Plan) highlights the importance of considering the full range of renewable energy sources, and not being prescriptive about particular types of energy. However, the draft South East Plan lists some sources in particular (i.e. biomass and wind energy) as being of particular potential. Consideration does need to be given to the sources of energy with the most potential in the district, although the final policy should not necessarily rule any others out.

#### **Core Strategy Issue 2E**

If the Council were to require a percentage of the energy to be used in new developments to come from renewable energy generated on-site, what should this percentage be?

## 2.12.6 Summary of Response (Key Issue 2E)

Several respondents suggested a target of 10% renewable energy for all non-residential or mixed use development above a threshold of 1,000 sq m, or residential developments of 10 or more units.

Other respondents suggest that this is a site specific issue and the percentage should be dependent on the unique features of the site and overall viability.

One respondent suggests that rather than focusing only on percentage generation, the Council should also consider energy efficiency in new build in relation to building materials, heating, cooling and water use.

Another respondent suggests that targets are not necessary; what is needed are parameters for design that reduce energy consumption.

One respondent comments that there should also be a target included regarding reducing carbon emissions from the site.

One respondent feels that local targets may result in financial burden which would damage wider objectives.

One respondent argues that targets would be inappropriate as the necessary data and figures are not available.

Another respondent suggests that further clarification is necessary – as a percentage of what?

## Officer Response

The identification of a target percentage of energy to be supplied from renewable sources is a requirement of the draft South East Plan and PPS22. Several local authorities had already introduced such a target. The responses that suggest reduction of carbon emissions through targets or sustainable design are particularly interesting as the ultimate aim of a renewable energy policy is to reduce carbon emissions. The responses indicate a clear concern about site specific viability issues and so flexibility will be a key part of the final policy.

#### **Core Strategy Issue 2F**

If you agree with Core Strategy Issue 2E, what type of developments can deliver renewable energy initiatives and what proportion should the Council seek?

### 2.12.7 Summary of Response (Key Issue 2F)

One respondent commented that this should be determined on a site by site basis, where the installation of renewable energy generation equipment would be viable given the type of development proposed, its location, and design.

One respondent suggests that a stricter policy should be considered, where environmental mitigation and adaptation measures for climate change should be incorporated into all development, on a site specific basis.

One respondent suggests that residential and commercial developments would be suitable to incorporate renewable energy.

One respondent suggests that heating, water and fuel systems would be suitable in general housing.

Another respondent suggests the incorporation of geothermal energy within all developments. Central sources of heat for central heating can be more efficient for buildings in new developments, but are very difficult to install in existing buildings.

### Officer Response

Responses to this question again raise the issue of 'site specific' targets, to be devised on a case by case basis only. This is not in accordance with the existing policy guidance (see response to Key Issue 2F, above). What is important is the need to apply any policy flexibly, to take account of site specific circumstances. The other consultation responses appear to suggest that generation targets are relevant for residential and non-residential developments. The final comment also raises the issue of retrofitting existing buildings. Another comment also raises the issue of climate change adaptation requirements for all new development (rather than solely focusing on mitigation measures). These issues will all need to be considered further in the preparation of the Core Strategy.

# Core Strategy Issue 2G

In seeking to protect and enhance the district's ecological resource which of the following options should the Council pursue?

Option 1: The Council should maintain the current approach of requiring developers to submit an ecological survey prior to determining an application for development which may affect a known or potential site of ecological value, and include policies in the Core Strategy to protect habitats/features of value from development.

Option 2: Subject to adequate resources being available, request that ecological surveys be undertaken to accompany a wider range of planning applications in order to identify features of value earlier in the process, and include policies in the Core Strategy to protect habitats/features of value from development.

### 2.12.8 Summary of Response (Key Issue 2G)

#### 2.12.8.1 General:

One respondent feels that the consideration of trees in planning applications mainly relates to visual amenity issues and should also relate to wildlife and habitats, especially relating to birds.

One respondent feels that Issues 2G, H and I should be merged. For all of these issues, Option 1 is the most appropriate response and Option 2 is unnecessary.

One respondent comments that both options place the onus on developers to provide ecological surveys. Reference should be made to the fact that development may be able to fund the ongoing protection and management of ecological areas.

Another respondent states that subject to resources being available, then assessing the value of potential development areas before allocating them for development would be preferable. Without resources, appropriate ecological surveys should be undertaken by a suitably qualified body.

## 2.12.8.2 Option 1:

Several respondents support option 1, with two qualifying this as only where necessary:

- Assessments should only be required where ecology is identified as an area needing extra consideration
- Surveys should only be necessary where there is evidence of ecological resources within a site otherwise there is an unnecessary cost on developers

#### 2.12.8.3 Option 2:

One respondent suggests that further clarification is needed of what will happen if resources are not available.

One respondent supports option 2, but without the caveat of resources.

Another respondent comments that if adequate resources are not available, this should not result in a worse approach than at present.

One respondent feels that option 2 will reduce delays later in the process. Existing data could flag up the need for ecological surveys. By identifying these potential constraints early on in the process, this could prevent delays once the planning application has been submitted. Features of value clearly need to be protected from development.

There were four comments of undetailed support for this option.

### 2.12.8.4 Alternative Suggested:

One respondent suggests that a rewritten, combined option is required: the Council should carry out independent ecological surveys of land likely to be the subject of planning applications so that the results from surveys carried out by developers can be verified.

### Officer Response

Support was expressed for both options and there is no clear favoured approach for the Core Strategy to pursue. For Option 2 concern was expressed that if adequate resources are not available, this should not create a worse approach than at present. Some respondents considered that surveys should only be required where there is evidence of ecological value to a site, otherwise there is an unnecessary cost on developers. Others considered that undertaking surveys on a wider range of applications could prevent delays once applications have been submitted. Ultimately the approach taken is likely to be dependent on resources.

## Core Strategy Issue 2H

In seeking to protect and enhance the District's biodiversity resource, which option should the Council pursue?

Option1: Continue as at present by concentrating on securing the protection/enhancement of features/species known to be present on a site and seeking compensatory measures where appropriate.

Option 2: Subject to adequate resources being available, be more proactive in encouraging developers to incorporate features to encourage biodiversity in all new development.

#### 2.12.9 Summary of Response (Key Issue 2H)

#### 2.12.9.1 Option 1:

One respondent supports option 1, but comments on the links between this and 2G.

One respondent generally supports option 1, but suggest that its implementation would need justification.

There were three comments of undetailed support for this option.

One respondent supported both Options 1 & 2.

### 2.12.9.2 Option 2:

Three respondents support this option but emphasise the importance of resource availability. Conversely one respondent objects to the reference to resource availability.

One respondent supports this approach because it is more proactive.

Three respondents supported this option without adding further details.

One respondent adds that it should be standard practice for all developments to incorporate sustainability measures (i.e. SUDs).

One respondent feels that option 2 is in line with PPS9. LAs should also maximise opportunities for 'building-in' biodiversity features within individual development proposals, and that development proposals which proactively look to incorporate habitat enhancement and/or creation, should be looked upon more favourably.

One respondent supported both Options 1 & 2.

#### Officer Response

Overall there is a greater level of response for Option 2, with representations stressing the need for adequate resources to be secured and the Council to be more proactive. It will be important for the Core Strategy to include a policy to incorporate features to encourage biodiversity in all new development wherever possible including green roofs and walls, SUDs, using native and locally characteristic species in landscaping schemes, using landscaping to link up existing areas supporting biodiversity, and including features such as bird and bat boxes.

## **Core Strategy Issue 2I**

In seeking to protect and enhance the district's habitats which option should the Council pursue?

Option1: Seek to ensure the creation of new habitats in association with development.

Option 2: Subject to adequate resources being available, allocate land for habitat restoration or re-creation for those habitats where opportunities for re-creation are limited.

#### 2.12.10 Summary of Response (Key Issue 2I)

# 2.12.10.1 General:

Two respondents comment that the Council should seek to maximise biodiversity opportunities through good design (in line with PPS9).

#### 2.12.10.2 Option 1:

One respondent feels that the availability of resources may limit the Council's aspirations to selecting option 1.

One respondent comments that Option 1 should be pursued. It is essential that the Core Strategy does not pursue strategies which cannot be realised on account of an unrealistic aspiration as to the availability of resources.

Another respondent feels that option 1 would enable resources generated by developments to enhance such areas.

## 2.12.10.3 Option 2:

There were two comments of undetailed support for this option.

### 2.12.10.3 Alternatives Suggested:

A number of respondents preferred a combination of Options 1 & 2.

One respondent states that with regards to Circular 05/2005 Planning Obligations, requirements for new development to fund habitat creation should only be identified where development proposals have a detrimental impact on important habitats.

### Officer Response

Support was expressed for both options. Most support was for merging the two options, as they are mutually compatible and not considered to be true alternatives. Since the consultation paper was written, large scale Conservation Target Areas have been mapped across Oxfordshire. These areas represent the areas of greatest opportunity for strategic biodiversity in the district. Development within or adjacent to a Conservation Target Area will be required to provide for biodiversity enhancement. The Conservation Target Areas effectively combine the two options and will need to be considered within the Core Strategy.

### **Core Strategy Issue 2J**

In seeking to create, protect and enhance areas of community woodland as a recreational and ecological resource, which option should the Council pursue?

Option 1: Seek to secure areas of community woodland in association with allocations for development.

Option 2: Seek to identify circumstances where the Council could purchase areas of land specifically for community woodland when the opportunity arises.

### 2.12.11 Summary of Response (Key Issue 2J)

## 2.12.11.1 General:

Two respondents suggest that the creation of new woodlands should be related to development. One asks for clarification whether the requirement to provide community woodland be in addition to the need to provide community open space. The other states that with regards to Option 1, the scale of woodland should be related to the development. The Council should not purchase land itself in Option 2 but should work in partnership with the Woodland Trust.

One respondent suggests that land for creation and restoration should be allocated in the LDF and it should be appropriate for the particular habitat being suggested. The Council should also be aware of the Biodiversity hotspots work being done by TVERC and the Biodiversity Implementation Manager (of OCC).

### 2.12.11.2 Option 1:

There were a number of undetailed expressions of support for this policy.

Two other respondents objected to this option, commenting that community woodland may not be appropriate in all allocations for development sites and alternative ways of maximising biodiversity should be sought. One of the 'general' comments above highlighted that the Council should not purchase land itself, but should work in partnership with organisations such as the Woodland Trust.

#### 2.12.11.3 Option 2:

Two respondents support Option 2, and one would promote the use of voluntary contributions from new development.

### 2.12.11.4 Alternatives Suggested:

Five respondents feel that Option 1 and 2 should be merged into one approach as neither should operate in isolation. Additionally, the Council would potentially miss out on opportunities if these options are made too specific.

# Officers Response

Much support was received for the options being combined, as they are not mutually exclusive.

### **Core Strategy Issue 2K**

How should the Council seek to balance the potentially competing issues of protecting the historic environment and accommodating necessary development? Option1: The historic environment is a legacy which is irreplaceable and which the Council has a duty to protect and enhance and greatest weight should be given to this in assessing proposals for new development.

Option 2: The historic environment is one material consideration that should be taken into account and weighed against the benefits of development that encourages economic growth.

## 2.12.12 Summary of Response (Key Issue 2K)

#### 2.12.12.1 General:

One respondent suggests that economic, social and environmental issues should be considered in an integrated way together with sustainability assessments to assess impacts.

Another respondent argues that the constraints posed by the historic environment should be recognised.

One respondent believes there are no tensions between the built heritage and development.

One respondent objects to the reference within this section to 'available resources'.

One respondent states that the Council has a duty to protect areas of historic environment; however, it should be given the fullest weight alongside other considerations in assessing proposals for new development.

One respondent suggests the approach should be based on national and regional policy guidance (PPS1, PPG15) and should take into account site specific issues, such as Conservation Area Appraisals. Regeneration of certain sites with historic importance may enable them to have a sustainable long term future, such as Bicester Airfield.

One respondent comments that the historic environment has gained its character from evolution and change and so future change should not be prohibited but should have regard to that history.

#### 2.12.12.2 Option 1:

One respondent suggests the strongest option should be chosen as the historic environment is irreplaceable and its protection should be given overriding priority.

Another respondent feels that great weight should be given to the historic legacy if there is any danger that development should damage or reduce it.

One respondent supports option 1 and suggests that developers should fund assessment of likely impacts of proposed development on buildings.

One respondent expresses support for this option and the breadth and meaning given to the term 'historic environment' in paragraphs 10.59 and 10.60.

There were a number of undetailed comments which expressed support for this option.

### 2.12.12.3 Option 2:

Eight respondents support this option, referring to the need for a balanced approach and recognising other benefits from development. All aspects of sustainable development need to be taken into account in development planning as well as the need for development, such as housing. The Option also needs reference to other types of benefits other than economic growth.

Another respondent suggests that reference also needs to be made in both of these options to archaeology. Option 2 is appropriate but also needs to take into account other benefits from development.

One respondent comments that development and the preservation of historic environment are not mutually exclusive, as per PPG15.

There were a number of undetailed comments which expressed support for this option.

### Officer Response

Responses to this question were evenly balanced between supporting Options 1 & 2. The Council's approach to this issue will be informed by national and regional policy approaches. It is important however that the Core Strategy seeks to secure the preservation and enhancement of heritage assets. Additional thought will be given to whether elements of the proposed policies on the historic environment would be better placed in the Delivery DPD rather than the Core Strategy.

#### Core Strategy 2L

Where do you think the Council's priority should lie with regard to conservation areas?

Option 1: Continue to designate new conservation areas.

Option 2: Concentrate on the review and preparation of management plans and conservation area appraisals for existing conservation areas before considering the designation of additional conservation areas.

#### 2.12.13 Summary of Response (Key Issue 2L)

# 2.12.13.1 General:

One respondent refers the Council to English Heritage's 'Guidance on Conservation Area Appraisals'.

One respondent objects to the wording 'adequate resources' in this section. Cherwell should make adequate resources available. Councils are now obliged to make available adequate resources for carrying out detailed Conservation Area Appraisals for all of the Conservation Areas in their control.

#### 2.12.13.2 Option 1:

One respondent supports option 1 as they believe option 2 allows for stagnation on this issue.

# 2.12.13.3 Option 2:

One respondent feels that designating additional areas where Conservation Area status is not warranted by the historic and architectural quality of the area, and continued designation, would tend to devalue the currency.

Two respondents comment that Conservation Areas should not inhibit important development and Option 2 means resources can be distributed effectively. If new Conservation Areas are pursued, great care should be taken with regard to their timing, justification and extent of boundaries so as not to unnecessarily inhibit or stifle important development proposals. Resources should be used to prepare management plans and Conservation Area appraisals before additional areas are designated.

One respondent suggests that resources have to be distributed across the Council's responsibilities and therefore it would be more appropriate to concentrate resources on reviewing existing area and formulating development guidance and thereby assisting developers.

Another respondent suggests that new designations should be fully justified.

One respondent comments that the most important buildings will already have been identified in the past.

There were a number of undetailed comments expressing support for this option.

### 2.12.13.4 Alternatives Suggested:

Four respondents comment that option 1 and 2 are not mutually exclusive. Existing areas should be managed properly, but this does not exclude designating appropriate new areas. Resources are also inevitably a consideration.

#### Officer Response

Most comments appeared to support Option 2, although interestingly there were also a number of comments that suggested Options 1 & 2 were not mutually exclusive. However, many of respondents acknowledged that there is a choice to be made, based on the allocation of limited resources. The Council's approach on this issue is likely to be influenced by national and regional policy guidance, as well as corporate priorities and resources available. However it is important that both the Core Strategy and the Delivery DPD acknowledge the importance of Conservation Areas and the need to secure high quality design that positively contributes to the character and appearance of these areas.

## **Core Strategy Issue 2M**

Which approach do you think the Council should take in seeking to protect buildings of local architectural or historical interest?

Option 1: Respond as and when non listed buildings are under threat.

Option 2: Include a policy seeking the protection of identified buildings of local architectural or historic interest across the District.

## 2.12.14 Summary of Response (Key Issue 2M)

#### 2.12.14.1 General:

One respondent suggests more guidance is needed on the overall structure of Core Strategy policies to ensure that buildings of all designations are protected.

Another respondent feels that it is not necessary to protect buildings that are not nationally listed or which do not come under a specific policy in the plan.

One respondent suggests that valued buildings should be on a local list. But, another respondent believes there is no value in local listing; buildings either warrant statutory protection or not.

One respondent feels that neither option is appropriate. The Council needs to be more pragmatic and flexible in its approach. There is a shortage of housing and listing certain buildings may put buyers/renters off properties as a result.

### 2.12.14.2 Option 1:

One respondent comments that option 1 allows for balance in terms of the protection of statutorily listed buildings whilst also incorporating other considerations such as economic development.

### 2.12.14.3 Option 2:

One respondent comments that it is too late when a threat has arisen (and so they support Option 2).

Another respondent supports this option feels that locally listed buildings need protection. As per PPG15, Councils should call on sufficient specialist conservation advice, whether individually or jointly, to inform their decision-making and to assist owners and other members of the public. This means that Cherwell needs to make more resources available.

One respondent supports option 2 and believes developers should pay for assessment of impact of development on particular buildings.

There were a number of undetailed comments expressing support for this option.

#### Officer Response

Overall there was a higher level of support for Option 2, for the Council to prepare a local list of valued buildings. This is something that the Council could pursue outside of the Local Development Framework and the Core Strategy. However, ultimately, the preparation of such a list will be dependent on resources available to the Council.

#### Core Strategy Issue 2N

Which approach do you think the Council should take in considering local distinctiveness?

Option 1: Promote traditional design that responds to local vernacular, materials, building traditions and landscape character.

Option 2: Promote contemporary design utilising modern technology to increase freedom of expression.

Option 3: Employ traditional or contemporary design solutions appropriate to the context.

### 2.12.15 Summary of Response (Key Issue 2N)

#### 2.12.15.1 General:

One respondent comments that new developments should be within the context of the local area.

One respondent states that local distinctiveness is not defined on a consistent basis through the preparation of any SPD. Notwithstanding this, there is support for a better quality of design but policy should not stifle innovation.

### 2.12.15.2 Option 1:

One respondent considers this to be most suitable option for the existing environment. The policy must, however, seek more distinctive design where appropriate.

Another respondent supports this option, stating that developers can differentiate their designs on the inside.

### 2.12.15.3 Option 2:

One respondent supports the promotion of contemporary design with the incorporation of modern technology.

# 2.12.15.4 Option 3:

One respondent considers this to be the most flexible option, promoting traditional or contemporary design in accordance with its surroundings. This option would allow for, and would not stifle, innovative design solutions (a number of respondents echoed this point).

One respondent supports this option – good design should be relative to its surroundings; the promotion of traditional or contemporary design appropriate to local context is the most suitable.

One respondent supports high quality design that reinforces local distinctiveness, whether traditional or contemporary.

Another respondent supports this option as a singular approach to local distinctiveness would be inappropriate. Site specific circumstances and market conditions should be considered.

One respondent supports this option as it allows for innovative design. Innovative design could lead to major energy savings in new developments.

Another respondent supports this option but suggests amendment to allow for a mix of traditional and contemporary design solutions (rather than either/or approach). They comment that the PPG3 guidance should be acknowledged and council standards on parking, road layout and private amenity space should be reviewed.

One respondent supports this option as contemporary design could be incorporated in appropriate locations. If design solely concentrates on the local tradition, the inclusion of new technologies will be unlikely.

Two respondents comment that this allows for innovative design (where other options do not). One of these adds that either traditional or contemporary design solutions could be appropriate dependent on the context.

There were a number of undetailed comments expressing support for this option.

#### 2.12.15.5 Alternatives Suggested:

One respondent supports options 1 and 3.

One respondent suggests that option 1 is more appropriate for the majority of villages and option 3 would be more appropriate for Banbury, Bicester or Kidlington, where contemporary design may be appropriate.

One respondent observes that option 3 appears to be the most attractive option but the wording does not specifically promote good design.

Another respondent supports options 1 and 2.

One respondent disagrees with all options: the focus should be on high quality design. Depending on context this will be high quality contemporary or traditional design that reinforces local distinctiveness.

### Officer Response

This question received a relatively high level of response. Clearly, local distinctiveness is an important issue for the Core Strategy and the Local Development Framework to consider. Overwhelmingly, there was support for Option 3 (or for combinations of Options 1 & 2 which also encompass quality of design) – employing either traditional or contemporary design solutions, according to the context. The Core Strategy needs to contain a policy that promotes this approach; with new developments respecting their traditional context – but this does not mean replicating existing styles and details. There are opportunities to reinterpret local distinctiveness through modern interpretations based on a thorough analysis of the existing context. Such a policy could also be detailed in the Delivery DPD or through Supplementary Planning Documents as the Local Development Framework progresses.

# **Core Strategy Issue 20**

Which of the following do you consider the most effective ways of improving people's image of the district (please identify as many as you consider appropriate):

- a) Improve the appearance of those parts of the district which are visible from the main transport corridors by means of improved landscaping and better siting of development.
- b) Improve the quality of the main urban centres and encourage positive change.
- c) Improve the quality of the public realm generally to reduce degradation and neglect, the inappropriate re-instatement of street furniture and a surplus of street signage and clutter.
- d) Improve the River Cherwell and the Oxford Canal.
- e) Seek to ensure a good standard of house extensions.
- f) Seek to improve integration of the parked car within the built environment.
- g) Seek to improve residential environments.

#### 2.12.16 Summary of Response (Key Issue 20)

#### 2.12.16.1 General Comments:

One respondent feels the most important issues generally are the views of Banbury from the M40, and inappropriate alterations to housing.

One respondent supports all options; but improving the image of the district should not just be limited to the main transport corridors.

One respondent argues that the image should be improved for those living within the district only. In the light of this, all of the aims are equally valid.

## 2.12.16.2 Option A:

This option received a number of undetailed comments of support.

One respondent disagreed, stating that the focus should not only be on the view for those passing through the main transport corridors. This will not improve the overall quality of the District.

Another respondent comments that the views from the M40 and the railway are a poor reflection of Cherwell, which could be improved by reinforced landscaping and removing unoccupied industrial sheds.

# 2.12.16.3 Option B:

This option received a number of undetailed comments of support.

One respondent suggests existing buildings should be upgraded and enhanced where they have the potential to enhance the character and appearance of a place.

### 2.12.16.4 Option C:

This option received a number of undetailed comments of support.

One respondent suggests particular reference should be made to the need to stop roundabouts being used for advertising. Also the River and Canal should be exploited as positive examples of Banbury's distinctiveness and not hidden behind old sheds and buildings.

One respondent feels this should make reference to the Local Transport Plan objectives relating to streetscape.

Another respondent comments that it should make reference to the need to maintain locally listed buildings. The rationalisation of signage would rapidly improve poor appearance.

#### 2.12.16.5 Option D:

This option received a number of undetailed comments of support.

One respondent comments that the focus on the River Cherwell and the Canal are consistent with the aims of the Oxfordshire Structure Plan 2016.

Another respondent supports the inclusion of references to the Canal, which is of great importance as an amenity for the whole town. There should be an Oxford Canal Conservation Area, particularly within Banbury, with a focus on the maintenance of the waterways, river flow, the industrial heritage and the traditional canalside character of the area.

#### 2.12.16.6 Option E:

There were some undetailed comments of support for this option.

One respondent suggests many houses in Conservation Areas are disfigured by inappropriate additions and this is a major problem, affecting the cherished local scene and local distinctiveness. They would strongly support policies, grants and incentives that would encourage the restoration of such features to their original appearance, form or style.

### 2.12.16.7 Option F:

This option received a number of undetailed comments of support.

One respondent comments that this private car integration issue is consistent with County Policy.

Another respondent suggests that it is futile to build homes with inadequate parking, which frequently leads to cars being parked on adjacent greenfield land.

One respondent suggests the Council should actively restrict parking on new developments if it is committed to sustainable growth in Cherwell.

One respondent feels this point is ambiguous. They refer to the benefits of underground parking and suggest that the redevelopment of Bicester town centre would be the perfect example of where an underground car park could be built into the project.

One respondent feels that this will be an ever growing problem as car ownership increases. There will have to be free or low cost off-street parking provision for people living in the problem areas within central Banbury.

Another respondent comments that car parking in residential areas is out of control.

# 2.12.16.8 Option G:

There was one undetailed comment expressing support for this option.

One respondent suggests there are many methods by which residential environments can be improved: including road and pavement improvements, parking reduction, tree planting and traffic calming measures in the residential parts of the town- providing that they do not compromise the integrity of the Conservation Area.

One respondent feels this option should make reference to the benefits of greening of residential areas through tree planting

#### Officer Response

This question asked respondents to consider the specific circumstances of the district, and asked which of a list of factors should be the focus to improve the image of the district. Each of the issues listed received some level of support and it is difficult to identify a clear 'front runner' as the focus for action. One issue which received the most support related to integration of parked cars within the built environment. Consideration may need to be given to how the Council can work with the County Council on tackling this issue.

## **2.13 Key Issue 3**

The need to promote a prosperous and sustainable community

## 2.13.1 Summary of Response (General)

One respondent suggests employment land should be balanced with housing allocations in Category 1 villages.

One respondent suggests an additional bullet point should be added to read "Promoting the appropriate retention and adaptation of existing businesses within the District". Wording should also be added to Para 11.2 to refer to the major employers which are located outside of Banbury, Bicester and Kidlington.

Another respondent feels the Core Strategy should make reference to Oxford and the need there for a supply of good quality business locations which are well connected to major centres of the population, public transport and road connections. They should also be clustered with other technical and knowledge centres.

Two respondents believe that employment policies should be based on the Employment Land Review findings; one adds that provision should also be made for a range of international and local businesses.

One respondent shows support for the Key Spatial Objectives linked to this chapter.

One respondent suggests a further objective should be added to read: "To identify a variety of sites in sustainable locations for new employment development to attract inward investment and create a choice of work places close to where people live".

Another respondent suggests employment policies should take into account the RES 2006-2016.

#### 2.13.2 Summary of Response (Key Issue 3A)

#### **Key Issue 3A**

How should the Council provide additional employment space?

#### 2.13.2.1 General:

One respondent suggests reference should be made to the circumstances of Oxford, as Cherwell's economic needs should not be provided for in isolation.

Another respondent suggests there should be a range of sites for employment particularly at Bicester in order to diversify the economy. There will also need to be a matched expansion in terms of housing opportunities.

## 2.13.2.2 Option 1

# **Key Issue 3A Option 1**

Provision of key employment sites in Banbury and Bicester only

One respondent suggests Banbury and Bicester should be the focus for development as identified in the South East Plan, whilst another respondent supports this view but suggests the inclusion of sustainable rural settlement.

One respondent supports Option 1, but suggests reference should also be made to the findings of the Employment Land Review. There should be a coherent strategy which also acknowledges the importance of providing a better balance between local employment opportunities and the resident work force in Bicester.

One respondent feels an Employment Land Review should be undertaken and development directed to those areas which are considered appropriate.

One respondent suggests there needs to be balance between the housing and employment supply in order to avoid creating additional demand for travel between work, home and other facilities (link with the first two general comments).

Another respondent suggests there is demand for industrial and employment sites in Bicester which could be provided for through Option 1. Industry seeks locational advantages in response to various external factors such as the workforce catchment area and transport considerations.

There were two undetailed comments of support for this option.

One respondent comments that they do not understand how Option 1 could be enforced.

# 2.13.2.3 Option 2:

### **Key Issue 3A Option 2**

Provision of key employment sites in Banbury and Bicester plus unlimited sites in sustainable settlements

One respondent suggests that Option 2 is the most appropriate solution as it is balanced, recognising the importance of Banbury and Bicester with regards to the OSP2016, but also allowing for some development in other locations.

Another respondent comments that Option 2 is supported by the Oxfordshire Structure Plan 2016, in recognising the importance of Banbury and Bicester, but also allowing for limited growth in other settlements which may reduce the need to travel in these locations. Clearly the benefits of individual sites will need to be assessed against transport policies.

One respondent supports Option 2, but suggests the Core Strategy should not be too prescriptive. Employment opportunities arise naturally, and too restrictive planning policies may hinder good development.

Another respondent supports Option 2 as this will ensure that there is a rich supply of employment opportunities to match housing development in Banbury and Bicester, and reducing the need for out commuting. However some flexibility is necessary to allow for limited employment provision at other less sustainable locations in order to meet local needs and to safeguard against the proliferation of commuter towns.

There were four comments of undetailed support for this option.

## 2.13.2.4 Option 3:

# **Key Issue 3A Option 3**

Provision of smaller employment sites within Banbury and Bicester

No comments.

### 2.13.2.5 Option 4:

# **Key Issue 3A Option 4**

Provision of smaller employment sites within Banbury and Bicester plus limited sites in sustainable settlements

There was one comment of undetailed support for this option.

### 2.13.2.6 No Option Preferred:

One respondent suggests a mix of Options 2 and 4 is recommended for providing a more balanced approach to employment across the District. Although a key focus for future employment growth should be directed towards Banbury and Bicester, it will also be important to accommodate businesses as part of other settlements in order to seek to ensure sustainable, balanced and inclusive communities

One respondent supports Options 1 and 4 as this will ensure provision in the main town centres close to where people live and so reduce journey to work distances and also car use. However, it is also desirable to provide more limited local employment.

Another respondent feels that employment land allocations should be decided by the market. A flexible reaction to economic changes is necessary to 'recession proof' the economy.

One respondent feels that reference should be made in particular to encouraging farm diversification.

Another respondent feels that reference should be made in particular to encouraging the expansion of existing businesses in rural areas to meet local needs.

One respondent suggests a new fifth option: provision of key sites which will make a significant contribution to the economy and which are located adjoining to the strategic road network.

#### 2.13.3 Summary of Response (Key Issue 3B)

## Key Issue 3B

How should the Council ensure business land and property stick within Cherwell can adapt to changing future economic demands?

### 2.13.3.1 General:

One respondent argues that there should be no restrictions as flexibility is necessary to adapt to changing future economic demands.

Another respondent agrees that flexibility is necessary to adapt to particular sites becoming surplus to requirements and which could be used for alternative or mixed uses.

#### 2.13.3.2 Option 1:

### **Key Issue 3A Option 1**

Protect all allocations for employment use and allow greater flexibility to change between use classes

There were two comments of undetailed support for this option (one stated that this was followed by Option 3 as a second choice).

## 2.13.3.3 Option 2:

### **Key Issue 3A Option 2**

Provide protection for employment us and/or flexibility in use class on a site by site basis (including allocations and existing development)

One respondent supports option 2 as a 'mid way' between Options 1 and 3. However protection should be used with discretion.

Another respondent suggests option 2 allows for flexibility. They also support the identification of 'reserve sites' for longer term employment use.

One respondent suggests the Option should be changed to make reference to a proper review and assessment of potential from new allocations.

There were two comments of undetailed support for this option.

## 2.13.3.4 Option 3:

### **Key Issue 3A Option 3:**

Allow market trends to dictate future uses, abandoning sites to other, non employment, uses if their current uses are no longer in demand

One respondent considers Option 3 to be the most appropriate at this stage before the findings of the Employment Land Review are published.

Broad support for Option 3, but more reference needs to be made to the findings of the Employment Land Review and the update to PPG3 regarding the use of employment allocations for other uses such as housing where allocations are no longer needed.

There were two comments of undetailed support for this option.

#### 2.13.3.5 No Option Preferred:

One respondent suggests reference should be made to the findings of the Employment Land Review, with a view to reallocating those sites that no longer meet modern business needs or are in conflict with adjoining land uses. Additional employment allocations should also be made to accommodate new and expanding businesses, particularly in reference to Bicester and the new housing proposed there.

Another respondent supports 'no option'; however, they advise that the full implications of each option should be understood. Option 2 would affect the amount of Previously Developed Land coming forward, whilst Option 3 will require the monitoring of the loss of employment land so that new allocations can be made.

#### 2.13.4 Summary of Response (Key Issue 3C)

#### **Key Issue 3C**

Which sectors of the economy should the Council promote?

Respondents support the following sectors:

- Businesses which can provide a wide range of economic and other benefits
- Need to retain existing businesses rather than only attracting new ones
- First class range of international businesses, based on the results of the employment land studies being carried out for Cherwell and Oxford
- Knowledge based sector and inward investment
- Business/commercial sectors
- Hi-tech, creative, Research & Development, service, retail and leisure industries
- All sectors of the economy

### 2.13.5 Summary of Response (Key Issue 3D)

# Key Issue 3D

In seeking to promote the rural economy in Cherwell, which approach should the Council take?

#### 2.13.5.1 General:

One respondent asks which rural settlements are considered to be the most sustainable locations for development (e.g. Category 1 villages).

Another respondent suggests there should be most development in the main towns with limited employment development in the rural areas to meet local needs.

## 2.13.5.2 Option 1:

# **Key Issue 3D Option 1**

Economic activity should be centred on existing sustainable settlements

There were two comments of undetailed support for this option.

One respondent raised a query over the meaning of 'sustainable' in this context.

## 2.13.5.3 Option 2:

## **Key Issue 3D Option 2**

Economic activity should be spread across the rural areas of the district in sustainable locations

There was one comment of undetailed support for this option.

One respondent suggests inserting the words 'of an appropriate scale' in line with PPS7.

One respondent raised a query over the meaning of 'sustainable' in this context.

One respondent supports Option 3, but states that it needs modifying to make reference to a large scale, suitably located site which is of regional importance and which will make a significant contribution to the economy.

Another respondent supports Option 2, with conditions that protect the local environment to ensure it would provide the most flexibility.

One respondent has concerns over Option 2 in terms of its potential travel implications.

# 2.13.5.4 New Options Suggested:

One respondent suggests a mix of Options 1 & 2 as follows: "Economic activity should be mainly directed towards existing or planned sustainable settlements although there may also be opportunities to accommodate sustainable economic activity elsewhere across rural areas of the District".

Another respondent suggests the options are not mutually exclusive. They express some support for Option 1, but query how 'sustainable locations' are defined.

#### 2.13.5 Summary of Response (Key Issue 3E)

#### **Key Issue 3E**

What approach should the Council seek to take in encouraging sustainable tourism development?

#### 2.13.6.1 General:

One respondent supports tourism development in areas with good access to non-car transport modes.

## 2.13.6.2 Option 1:

# **Key Issue 3E Option 1**

The promotion of 'business' related tourism located within main urban areas with good transport links; and

Encourage tourism in other sustainable locations where the tourism product is associated with its rural location and does not have significant impact on the natural environment

One respondent suggests this option would minimise traffic outside of urban areas but increase tourism.

There were three comments of undetailed support for this option.

### 2.13.6.3 Option 2:

## **Key Issue 3E Option 2**

Promotion of 'business' related tourism in sustainable locations that are demonstrably accessible by non car modes and do not have significant impact on the natural environment, and

Encourage tourism in sustainable locations where the tourism product is associated with its rural location and does not have significant impact on the natural environment

One respondent supports Option 2 as this may encourage the development of large scale conference centres and hotels in inappropriate locations.

There was one comment of undetailed support for this option.

### 2.13.6.4 New Options Suggested:

One respondent feels there is confusion over the difference between Option 1 and Option 2

Another respondent suggests neither of the options is acceptable.

One respondent suggests a new Option 3 should consider the contribution to the economy of a regionally significant tourism attraction.

# Officer Response

Many useful responses were provided to this question (many of which highlight the importance of defining terms such as 'appropriate'). The key suggestions appear to be the need to support the retention of existing businesses, to support local, small scale employment opportunities in rural areas and develop rural economic or diversification policies.

The Core Strategy itself needs to expand and enlarge upon the role of neighbouring areas in the Cherwell economy, build in the findings of the Employment Land Review, and make clear links to the wider aims and objectives of the Core Strategy (i.e. reducing out commuting).

Many of the comments suggest flexibility is required in terms of economic policies and employment land allocations.

In response to questions on specific sectors of the economy, comments can be broadly grouped as supporting those sectors of the economy which are positive to all and which focus on high value added.

In terms of tourism, there was a slightly higher level of support for focusing tourism development in the urban areas with good transport links. However the low number of detailed responses to this question overall suggests that tourism might not be one of the most contentious or strategic issues for the Core Strategy to consider.

### **2.14 Key Issue 4**

The need to ensure full and timely provision of housing, including affordable housing

## 2.14.1 Summary of Response (General)

One respondent suggests the assessment of future housing requirements for the preparation of the Core Strategy and Banbury and North Cherwell DPDs should, in the interim, be based on Oxfordshire Structure Plan 2016.

One respondent suggests the Core Strategy should deal separately with the housing provision for Banbury, Bicester and the rest of the District for the period to 2026 and show how much new land needs to be identified for housing in each of the two towns and the rest of the District in the Site Allocations Documents.

Another respondent comments that sustainable edge of town locations in Bicester will need to be sought once the urban capacity is exhausted. Previously developed land is preferable over Greenfield land.

One respondent supports the Council's recognition that 'a choice may sometimes have to be made between making efficient use of Previously Developed Land and securing a site which could produce the best possible development'. They refer to PPG3 which states that in some cases Greenfield sites may prove preferable over poorly located Brownfield sites and should be brought forward in preference.

One respondent suggests Bicester Airfield could accommodate some of the housing requirement – it is a major growth area, the site is previously developed and it has been considered by the Council before.

One respondent argues that operational Ministry of Defence sites in Cherwell should be retained in order to support the wider defence capability. The Core Strategy should ensure an appropriate planning policy framework is in place to support operational military development during the period covered by the LDF.

One respondent supports the statement that suggests 1000 dwellings to be provided at former RAF Upper Heyford. However, another respondent feels that apart from a few references to Upper Heyford, the document gives little detail over the creation of a sustainable community at this location.

One respondent feels the housing strategy should be based on principles in national planning policy guidance which aim to create sustainable communities. The sequential approach set out in PPG3 and PPS3 for allocating and releasing land should be adopted.

One respondent states that efficient use of previously developed land is essential. In some cases where it is considered appropriate, residential development should be promoted on allocated employment sites. They state that para 42a of PPG3 supports this view.

Another respondent supports the sequential test and making the best use of previously developed land but stresses the importance of ensuring that the sequential approach is underpinned by realistic assumptions about genuine availability and likely yield from previously developed sites. PPG3 and PPS12 warn against over optimistic estimates from PDL.

One respondent suggests the figures in Housing Technical Paper 1 may change as a consequence of its reliance on draft PPS3 regarding the allocation of as much land as

possible before relying on windfalls, and, secondly, the uncertainty about the figures arising from the South East Plan.

In relation to the Housing Technical Paper, one respondent commented that the disparity between the Oxfordshire Structure Plan 2016 and competed housing provision show that there will be a shortfall of 164 dwellings per annum in the District. There is, therefore a need to deliver additional housing, particularly at sustainable locations outside Banbury and Bicester.

In relation to the Housing Technical Paper one respondent commented that this paper uses outdated information in the Oxfordshire Structure Plan up to 2026; more recent information is available.

One respondent suggests the figures used in this issue do not take into account the housing delivery targets that Cherwell will need to meet to 2026 since the South East plan was submitted 31 March 2006. Reference should be made to CO1 and CO2 in the South East Plan.

One respondent states that the South East Plan has now been submitted and states that Cherwell should provide 590 per annum or 11,800 between 2006 -2026. Through the Core Strategy and other DPDs the Council should demonstrate how the South East Plan allocation will be delivered, while also including sufficient flexibility to take into account the untested nature of the allocation and hence the possibility that it may not be same in the final version of the South East Plan.

In relation to para 12.38, one respondent comments that this table is inadequate and needs to explore other futures. In particular the Council should not limit the 2016-2026 to a flat rate ten year projection based on Oxfordshire Structure Plan rates to 2016. This does not reflect the Barker Report findings or the current government agenda for increasing house building in the South East. Scenarios should also account for key allocated sites being deleted or refused planning permission, or where Urban Housing Potential Study Sites are deleted.

One respondent supports the interim approach that the Council is following namely to adopt the Oxfordshire Structure Plan projections until the South East Plan is progressed further. However, the figures for the Cherwell District could increase once the South East Plan has been considered at examination.

One respondent feels the Council has a poor record in bringing forward sites for development and the Core Strategy needs to address this.

One respondent suggests the Council should take into account the principles in the emerging South East Plan so that fundamental changes are not required later when the plan has been adopted. Additionally the South East Plan identifies Bicester, Didcot and Wantage, Grove and the built up area of Oxford as the main locations to accommodate development in central Oxfordshire sub region. Bicester is to be a key area to accommodate future development needs in central Oxfordshire.

One respondent comments that the Council should not rely on windfalls given the guidance in PPS3. Not all of the sites in the Urban Housing Potential Study will come forward and therefore it is likely that the amount of allocated sites in Banbury should be increased accordingly. The Core Strategy should also seek to guarantee delivery. In relation to this, another respondent suggested the Council should address the completions shortfall and the worsening affordability in Cherwell.

Another respondent suggests the focus should be not only on ensuring that a sufficient amount of land comes forward, but also that it does so at the right time and in a range of locations to meet the needs of the District to 2026.

One respondent feels that to avoid the risk of creating a geographical imbalance in the provision of affordable housing across the District, the Council should concentrate development in a handful of locations including those which are located within the Green Belt, to ensure the viability and vitality of these settlements.

Another respondent suggests market housing should only be located in sustainable locations that reduce long distance commuting from rural areas, whereas affordable housing should only be located where there is a need.

One respondent argues that the Council will need to provide robust evidence to demonstrate that its approach to specialist housing is appropriate, sustainable, deliverable and viable, and will not fetter the delivery of the overall housing allocation for the area.

In relation to gypsy and traveller sites, one respondent comments that the Council will need to reflect upon the implications of draft PPS3 Housing and the related documents for its policies and proposals. Likewise it will need to consider the implications of the gypsies and travellers Circular 01/2006 and related documents. Also as relevant the Council will need to consider meeting the needs of travelling show people.

One respondent suggests that development should be phased so that infrastructure improvements are put in place ahead of the development, and it is easier to do this for a small number of large sites rather than a large number of small sites.

Another respondent feels that the Fordham methodology is flawed; but notwithstanding, there is a need to address the requirements of key workers.

#### Officer Response

The draft South East Plan is moving closer to adoption with the publication of the Secretary of State's Proposed Changes. It can be expected that the Core Strategy will need to accord with an adopted South East Plan by the time of submission (rather than the current Oxfordshire Structure Plan 2016). The Plan takes into account household projections and economic growth forecasts in arriving at housing growth figures. The Secretary of State is proposing that the district's total housing requirement should be increased to 13,400, compared to 11,800 in the original draft plan and 12,800 suggested in the Panel Report. It is understood that in contributing to the preparation of South East Plan, the County Council considered housing commitments and past building rates to establish a new 2006 baseline for future growth. Nevertheless, at 31 March 2006, the district had delivered 2 dwellings more than required for the first five years of the Structure Plan period.

The emerging South East Plan provides a requirement for the Central Oxfordshire subregion and the rest of Oxfordshire. In Cherwell this means a requirement of 6,400 in the Bicester and Central Oxfordshire area, including 4,900 at Bicester, and 7,000 for Banbury and North Cherwell. From the Panel Report it is understood that a figure of about 4,800 homes is expected for Banbury.

The emerging plan provides other direction on housing distribution including:

 The Oxford Green Belt should assist in prevent the coalescence of settlements and in safeguarding the countryside from encroachment

- Local Planning Authorities should seek to achieve 60% of all new development in the South East on previously developed land
- The prime focus for development should be urban areas
- Banbury will continue to have an important role as a small market town in supporting its wider hinterlands. It is expected that the town will help meet wider housing needs through provision of new dwellings
- Bicester will be a main location for development in the Central Oxfordshire subregion to improve its self-containment
- Elsewhere in the Central Oxfordshire sub-region limited development will be permitted to support the social and economic well-being of local communities
- Will be a matter of Local Development Documents to respond to housing figures for Central Oxfordshire. While there is a degree of flexibility associated with the figures, Local Authorities must in the first instance seek to deliver their sub-regional allocations within their part of Central Oxfordshire
- Local Planning Authorities should positively plan to meet the defined needs of their rural communities and should define the approach to development in villages based on the functions performed, their accessibility and the need to protect or extend key local services.

LDF policy will need to conform with the South East Plan upon adoption. Overwhelming evidence would be needed to justify any significant departure.

Since the issues and options paper was produced Planning Policy Statement 3 has been finalised and published. The PPS underpins the Government's response to the *Barker Review of Housing Supply* and achieving a 'step-change' in housing delivery. PPS3 provides new national policy which guides local decisions about planning for housing, including meeting the needs of the whole community, providing affordable housing, improving affordability and identifying the most sustainable strategic locations for housing growth. Of particular note, is that while priority should still be given to prioritising previously developed land, the former sequential test (para' 30 Planning Policy Guidance note 3 (2000)) no longer exists. There is now a broader emphasis on achieving sustainable development and meeting the vision and objectives for the area. PPS3 stresses the importance of identifying suitable sites that are deliverable and developable and ensuring a 5 year rolling supply of deliverable sites as well as providing for 15 year land supply post-adoption.

Following the publication of PPS3, an Oxfordshire wide Strategic Housing Market Assessment (SHMA) has been prepared which will inform policies aimed at meeting housing need and responding to market demand and which replaces the 2004 Fordham Housing Needs Study. Other developments include the publication of Government circulars on meeting the accommodation needs of Gypsies and Travellers and Travelling Showpeople, the on-going Partial Review of the South East Plan on the housing requirements of the Travelling Communities, and the publication of the Gypsy and traveller accommodation needs assessment for the Thames Valley Region.

These, and other changes, are being taken into account in preparing for the next stage of the Core Strategy. Site specific comments are noted and will be considered in preparing the draft Core Strategy.

### 2.14.2 Summary of Response (Key Issue 4A)

#### Key Issue 4A

How should the Council distribute its housing requirements within the district?

### 2.14.2.1 Option 1:

## Key Issue 4A Option 1

Distribute housing growth in accordance with Structure Plan policy: Banbury and Bicester as the main growth areas with the remainder at larger settlements that can be well served by public transport

One respondent supports options 1 and 4 which concentrate housing growth in Banbury and Bicester which is considered the most sustainable option. This is supported by another respondent who feels that Banbury, Bicester and Kidlington are all sustainable locations.

Several respondents state that development should be primarily focussed on the two larger settlements Bicester and Banbury in line with the strategy of the Oxfordshire Structure Plan 2016 and the emerging South East Plan.

One respondent suggests the Banbury and North Cherwell Site Allocations Plan should put greater emphasis on growth adjacent to Banbury.

Another respondent supports option 1 because it is in line with government guidance to achieve sustainable development. Services and facilities are accessible and reduce the need to travel.

One respondent feels that some development should be directed to larger towns and villages in rural areas to provide a varied stock of housing and sustain alternative services and facilities.

One respondent feels that given the level of requirement there will be a need to allocate sites on the edge of the urban area of Banbury. Furthermore, these sites can be brought forward without unacceptable environmental harm and can benefit existing infrastructure.

One respondent supports option 1 because they feel the other options contradict general concentration policies.

Another respondent suggests location and scale of new development should be based on robust assessments of environmental capacity and local need.

One respondent feels that Banbury and Bicester are most appropriate to accommodate major growth. However modest growth in the remaining larger villages should also be considered to sustain existing services and facilities and improve the sustainability credentials of these locations.

Another respondent supports a development strategy that focuses on the principal settlements, whilst still recognising the potential of other key settlements in the District, such as Bloxham, to deliver modest urban extensions in a sustainable manner.

One respondent argues that Banbury and Bicester are most appropriate to accommodate major growth. However, modest growth in the remaining larger villages should also be

considered to sustain existing services and facilities and improve the sustainability credentials of these locations.

There were two comments of undetailed support for this option (one of which also supported option 3).

### 2.14.2.2 Option 2:

### **Key Issue 4A Option 2**

Some reduction of growth at Banbury and Bicester and more growth at the larger settlements that can be well served by public transport

There were two comments of undetailed support for this question.

One respondent supports option 2 because it ensures that sustainable rural communities are retained in the District. However the Oxfordshire Structure Plan requirement of 623 dwellings per annum will give rise to a dwelling shortfall of at least 150 dwelling per annum, based on the 2003 based household proposals for Cherwell (783 per annum). Therefore continuation of building rates will need to continue in Banbury and Bicester, as well as larger rural settlements, the options are not mutually exclusive.

Another respondent supports option 2 as it accords more fully with the Plan's overarching sustainability objective.

One respondent feels that a mixture of options 2 and 3 should be chosen, with the majority of new housing still being directed to Banbury and Bicester but with some going to other larger settlements e.g. Kidlington and Cropredy. Some allowance for some smaller villages should also be considered to maintain and enhance their current levels of services and facilities.

One respondent supports options 2 and 3 and suggests there are several villages with railway stations between Banbury, Bicester and Oxford which would appear to be candidates for further expansion.

One respondent suggests that to conform to the housing allocations of the Structure Plan, the Core Strategy must make adequate provisions outside of Banbury and Bicester, focusing development on larger, more sustainable settlements. The Adopted Local Plan and Non-Statutory Local Plan identify Category 1 settlements as the most suitable locations for new housing in rural areas.

Another respondent argues that identification of appropriate locations for growth outside of Banbury and Bicester should be made according to agreed sustainability characteristics.

One respondent feels that it is not appropriate to redirect development away from Banbury as no suitable Category 1 sites were identified in the UHPS.

#### 2.14.2.3 Option 3:

## **Key Issue 4A Option 3**

Some reduction of growth at Banbury and Bicester and more growth at smaller villages in the interests of improving services and facilities including public transport

There were two comments of undetailed support for this option (one of which also supported option 1).

One respondent comments that the Council should plan for a limited range of new development opportunities in identified villages. Provision of housing in villages will sustain

local facilities and will support objectives for socially inclusive, sustainable communities by ensuring the provision of affordable housing in rural areas.

One respondent supports this option as it would allow a better spread of housing and would also preserve village facilities.

Another respondent suggests a mixture of options 2 and 3 should be chosen, with the majority of new housing still being directed to Banbury and Bicester but with some going to other larger settlements e.g. Kidlington and Cropredy. Some allowance for some smaller villages should also be considered to maintain and enhance their current levels of services and facilities.

One respondent supports options 2 and 3 and suggests there are several villages with railway stations between Banbury, Bicester and Oxford which would appear to be candidates for further expansion.

Another respondent feels this option would slow the expansion of towns into the countryside.

# 2.14.2.4 Option 4:

## **Key Issue 4A Option 4**

More growth at Banbury and Bicester and less growth at other settlements

There was one comment of undetailed support for this option.

One respondent supports options 1 and 4 which concentrate housing growth in Banbury and Bicester which is considered the most sustainable option.

Several respondents feel that Banbury and Bicester are the most sustainable locations and should be maintained as the key locations for housing development. They have also been identified in the South East Plan as priority locations up to 2026.

One respondent suggests that given the level of requirement there will be a need to allocate sites on the edge of the urban area of Banbury. Furthermore, they feel these sites can be brought forward without unacceptable environmental harm and can benefit existing infrastructure.

Another respondent argues that focussing growth at Banbury and Bicester in accordance with option 1 offers the greatest opportunity to create sustainable communities. However in the long term this will lead to unsustainable development, so the longer term focus should be on directing development at Banbury and Bicester with Option 4.

One respondent suggests the strategy should be to direct development in sustainable locations within the largest settlements before consideration of dispersal of growth to villages. Therefore the Council will meet the aim of developing the maximum amount of land in sustainable locations in the urban areas.

One respondent supports Option 4; however, they feel it needs to be acknowledged that not all development can be within the confines of the existing urban area and that some development will go on edge of urban settlements. This is the most effective way for infrastructure to keep pace with development, through large, comprehensive development which can deliver key infrastructure rather than a range of proposals for smaller settlements.

### 2.14.2.5 New Options Suggested:

One respondent suggests an option 5, to focus growth at Bicester. This continues the Structure Plan's focus on the principal urban areas to create a sustainable pattern of development, whilst at the same time ensures future conformity to regional guidance.

One respondent comments that none of the options promote a new settlement. They believe that a new settlement will be the solution and the chosen solution in the RSS.

Another respondent feels there needs to be specific mention made to the use of PDL resources. A PDL site such as Shipton on Cherwell quarry could be an alternative to large Greenfield releases. This approach is supported by PPG3 and the SEA Directive. The Core Strategy must also have regard to the 2003 ODPM household projections, which are different to those set out in the Housing Technical Paper.

#### 2.14.2.7 Other Issues:

One respondent feels the Core Strategy should show the broad distribution of housing provision in Banbury, Bicester, and the rest of North Cherwell and Central Oxfordshire.

One respondent suggests that development outside the two main settlements should be directed to larger towns and villages that are outside the Greenbelt. PPG2 states land outside the Greenbelt should be used first, where boundaries are amended in exceptional circumstances. Another respondent agrees, suggesting development should be concentrated in Banbury and Bicester and some of the Category 1 villages that are well served by public transport and that are outside of the Green Belt.

Another respondent feels that Bicester and Banbury should be the main areas for growth; however, where opportunities arise in the larger rural settlements (Category 1 villages) to accommodate development which enhances sustainability, that opportunity should be taken. This will help the Council's goal of providing 600 affordable dwellings by 2011.

One respondent states that the remaining strategic housing target should be allocated without a windfall discount as suggested in the draft PPS3.

One respondent feels that housing distribution should not be determined until the RSS has agreed the District target and housing trajectory. Instead distribution should be guided by: location according to need, good accessibility to employment and services, ability to meet needs of affordable housing for Cherwell and the surrounding area.

Another respondent states that distribution of housing must take into account sustainability, accessibility, location, provision of affordable housing and contribution to Cherwell's infrastructure.

One respondent has no preference. They realise that a significant increase of housing provision in Banbury and Bicester is inevitable and stress that development should not compromise the character and appearance of the historic fabric.

One respondent urges a proper audit of the supporting infrastructure required is undertaken before much more building is allowed. The audit should include roads, public transport, water supply, drainage and sewerage and the threat of flooding. They support that large developments on the urban fringe may be the best way to achieve new development and associated facilities.

One respondent stresses that developments on the edge of settlements should be developed in a tightly phased manner, to maintain a tight urban edge at all times.

One respondent comments that the paper is based upon housing requirements established in the Oxfordshire Structure Plan 2016, however these figures are only interim guidance until the South East Plan is adopted in spring 2008. It appears that It will be necessary to revisit the figures once the revised housing requirements for the South East Region are available.

They have submitted representations to the South East Plan identifying potentially surplus MOD sites which could contribute substantially to absorbing housing requirements over the next 20 years. In accordance to national policy, options 1 and 4 should be pursued, which ensures consistency with requirements of the emerging South East Plan and recognises Bicester as a Key growth area.

One respondent suggests the concentration of development in a few urban extensions should be avoided; rather there should be a dispersed pattern throughout the most sustainable rural settlements. There should therefore be a mix of Option 2 and 3 and the balance between rural and urban areas re-examined.

### Officer Response

As explained in response to general comments, the draft South East Plan is moving close to adoption and there is now more clarity on the broad direction that the Core Strategy's housing distribution will need to follow. Specific requirements are set out for Bicester and Central Oxfordshire and separately for north Cherwell. The South East Plan places emphasis on meeting the growth needs of Bicester and Central Oxfordshire before considering flexibility. It will be necessary to identify reasonable alternatives for housing distribution that lie within the parameters of regional and sub-regional policy but, in doing so, to consider where there is local evidence for adjustment. Overwhelming evidence would be needed for a significant departure to the broad strategy.

It may be reasonable to consider some redistribution separately within the two areas of the district e.g. from the rural north to Banbury or vice versa, or from the north of the district into the Central Oxfordshire sub-region. Because of the South East Plan's separate sub-regional strategy for Central Oxfordshire, redistributing to the north would not be appropriate.

Some options may not be appropriate to consider such as extremely high levels of growth in rural areas rather than the towns, contrary to the objectives behind the South East Plan's urban focus. Conversely, barely providing for growth in rural areas would not help provide affordable housing, deal with issues of affordability, and sustain local facilities.

Key factors affecting the local distribution strategy include:

- meeting the needs of communities, particularly providing affordable housing and achieving an appropriate balance between homes and jobs
- accessibility, sustainable travel and the availability of services, facilities, employment opportunities and other infrastructure
- landscape impact particularly the constraints at Banbury and the potential impact on rural areas
- the need to protect the green belt and avoid coalescence with Oxford
- the functions, sustainability and identity of villages
- the need to protect and enhance the historic environment
- ecological constraints such as the Oxford Meadows Special Area of Conservation
- flood risk
- whether there are exceptional circumstances to justify development in the green belt

- reducing carbon emissions, minimising the use of natural resources and the availability of previously developed land
- integrating development and achieving good design

## 2.14.3 Summary of Response (Key Issue 4B)

### **Key Issue 4B**

What overall percentage of all new dwellings should the Council seek on qualifying sites to secure as affordable housing?

- 30%
- 31-40%
- 41-50%
- Is there another option that you consider appropriate?

#### 2.14.3.1 General:

One respondent suggests the percentage of affordable housing sought should have regard to identified housing needs and viability of development. Research should be undertaken to establish economic factors, levels of housing subsidy, capacity of small sites to deliver affordable housing, and cost of converting Brownfield sites to housing. It is unlikely that an average rate of 30% affordable housing can be relied upon without intervention.

One respondent feels it is inappropriate to comment on affordable housing thresholds as PPG3 should be used as minimum site size thresholds.

One respondent feels that draft PPS3 should be reflected upon for the Council's policies and proposals. And another respondent feels the Housing Market assessment being commissioned by Oxfordshire districts should be considered.

One respondent suggests that evidence should be provided that shows its approach towards affordable housing is appropriate, sustainable, deliverable and viable and will not hold back overall housing allocation.

Another respondent suggests that local landlords should consider a review of empty private business flats and houses, and compulsory purchase should be considered. They understand the legal implications but states that it would free up a large number of properties and reduce the Council's waiting list of homeless persons.

One respondent feels that the affordable housing options are not justified. It is not clear that they're based on any sound, up-to-date assessment of future housing requirements.

One respondent agrees with an affordable housing policy in the Core Strategy but state that they shouldn't be prescriptive, and provision should be negotiated on a site by site basis. This is supported, as another respondent commented that the policy should acknowledge affordable housing provision is a matter of negotiation and will have regard to size, type, tenure and affordable housing to meet identified need.

One respondent comments that a target of 30% is not favoured, this is considered in excess, which may threaten viability of sites, particularly PDL in urban areas.

One respondent suggests the most effective way to ensure the delivery of affordable units is to plan for sufficient open market residential allocations. The Core Strategy should also not be too prescriptive on the issues of affordable housing. A target over 30% could serve

to bring into question the viability of sites (particularly where there are site specific issues e.g. contamination etc), whilst 30% in itself should only be a starting point for negotiations and may change according to site specific circumstances. Similarly the issues of size, type, tenure and affordability should also be left to negotiation.

With regards to the viability of schemes, the following comments were made:

- Careful consideration needs to be made on requirements for affordable housing provision to ensure provisions don't have negative impact on the viability of schemes. This could hinder provision of an adequate level of market and affordable housing
- Exceeding a 30% target may have an adverse impact upon viability of schemes.

Once respondent feels that targets should not be set in a Core Strategy but in a SPD that is regularly reviewed. It is also important not to deter house building and therefore, affordable housing should be limited to 30% and the thresholds in Options 2 & 3 are most realistic.

Another respondent feels that forcing affordable housing on developers pushes up the prices for all.

## 2.14.3.2 Option 1:

There were four comments of undetailed support for this option.

One respondent suggests that levels of affordable housing should be based on robust, up-to-date housing survey. The Council's 2004 HNS identified 30% to be suitable, therefore this should be maintained.

Another respondent has concerns of any levels more than 50%. 30% is considered most appropriate.

One respondent does not favour an excess of 30% within the major urban areas where greater choice of all housing predominates and there is less pressure to maintain local need housing as this could threaten the viability of sites.

One respondent feels that exceeding 30% could adversely impact upon the viability of schemes. And another respondent suggests that lowering the threshold could provide greater certainties of meeting the target

One respondent comments that the Fordham Housing Needs Survey doesn't appear to have generated a percentage requirement for affordable housing. 30% is an appropriate starting point unless further up-to-date survey is undertaken and suggests an alternative.

Another respondent suggests a new settlement option could deliver more than 30% affordable housing, if associated with good public transport.

One respondent considers 30% to be appropriate but also suggests a need to consider site specifics and local needs. The policy should allow flexibility (e.g. if remediation costs are high, site may be unviable to develop, so levels should be reduced).

One respondent suggests that 30% is likely to be achievable, although it cannot be relied upon.

#### 2.14.3.3 Option 2:

Two respondents support option B; however the policy needs to recognise availability of resources and viability of development when negotiating provision.

There was one comment of undetailed support for this option.

### 2.14.3.4 Option 3:

There was one comment of undetailed support for this option.

### 2.14.3.5 Option 4:

One respondent suggests requirements should be indicative and negotiable, refers to Government Guidance Circular 6/98.

One respondent objects to all the options.

Another respondent suggests the percentage should be flexible e.g. higher in Category 1 Settlements and lower in the smaller villages.

One respondent suggests anything up to a maximum of 30% depending on viability.

One respondent argues the proportion of affordable housing should be based on robust assessment of local need.

Another respondent feels the percentage should be flexible and take into account site specific matters (refers to Para 16 of PPG3 supporting argument).

One respondent suggests the policy should establish a balanced threshold which achieves addressing the need for affordable housing and creating mixed communities without harming the viability of schemes.

One respondent argues that lowering thresholds offer most effective means of increasing affordable housing delivery and should be explored before requirements are raised.

#### Officer Response

The Strategic Housing Market Assessment, providing evidence of the huge need for affordable housing, was produced in December 2007. The Council held a workshop on Affordable Housing Policy and the Local Development Framework on 10 July 2008 to discuss policy options. The Council intends to follow this by commissioning an Affordable Housing Viability Study to ensure that its policies would deliver the optimum viable levels of affordable housing whilst not undermining overall housing delivery and to meet the requirements of PPS3. It will be necessary to establish overall targets and requirements whilst allowing for negotiation and potential flexibility in individual cases where it is shown that viability issues exist.

#### 2.14.4 Summary of Response (Key Issue 4C)

#### **Key Issue 4C**

Should the Council set separate targets for different types of affordable housing? If so, what should these be?

One respondent suggests targets should be based on robust up-to-date assessment of housing need.

Another respondent suggests provision of affordable housing should be based on a site by site basis, with a minimum provision of 30% affordable on sites 15 dwellings or 0.5 hectares of land. This will secure affordable housing on all necessary sites.

From the Housing Needs survey, one respondent feels affordable housing should be split 70:30 between social rented and intermediate housing.

One respondent supports targets as they would provide clarity for developers and Housing Associations.

Another respondent feels that targets should not be set on types of affordable housing, there should be flexibility.

Another respondent believes that the only way this could work would be if financial contributions were made towards development off site.

One respondent comments that an overall target encompassing all types of affordable housing is the only way a policy could give the flexibility to apply the need to a site by site basis. For example, key worker housing must be created on specific sites and not on sites unrelated to the location that generates the need, which may be what would happen with District wide targets.

Respondents comment that targets should be based on research and local need.

One respondent suggests that targets are inappropriate, it should be determined on a site by site basis, as a set tenure mix will not suit all locations.

Another respondent feels that targets should not be set for different housing types.

One respondent recommends it is addressed in a SPD, and is subject to on-going monitoring and assessment.

Two respondents replied 'no' to this question (no details given).

# Officer Response

The Strategic Housing Market Assessment, providing evidence of the huge need for affordable housing, was produced in December 2007. The Council held a workshop on Affordable Housing Policy and the Local Development Framework on 10 July 2008 to discuss policy options. The Council intends to follow this by commissioning an Affordable Housing Viability Study to ensure that its policies would deliver the optimum viable levels of affordable housing whilst not undermining overall housing delivery and to meet the requirements of PPS3. It will be necessary to establish overall targets and requirements whilst allowing for negotiation and potential flexibility in individual cases where it is shown that viability issues exist.

# 2.14.5 Summary of Response (Key Issue 4D)

#### **Kev Issue 4D**

What thresholds would be appropriate for requiring affordable housing to be provided alongside market housing (i.e. on what size of development should affordable housing have to be provided?

#### 2.14.5.1 General:

One respondent objects to options 2, 3, and 4, as they are contrary to government guidance in Circular 6/98.

Another respondent suggests this will be dictated by the policy adopted under Issue 4B.

#### 2.14.5.2 Option 1:

# **Key Issue 4D Option 1**

- 25 dwellings or more / 1 hectare of land or more in settlements with a population over 3,000 (i.e. Banbury, Bicester, Kidlington and Bloxham); and
- 6 dwellings or more in settlements with a population of less than 3,000

Two respondents support option 1 because it accords with current adopted government guidance; there is no justification to depart from this.

One respondent comments that this is the current arrangement and is the best starting point.

Another respondent suggests policies that identify thresholds should be flexible to consider appropriateness and viability, and allow individual merits of each site and proposal to be assessed; this accords with adopted government guidance.

One respondent argues there is no justification for it to be lowered.

There were five comments of undetailed support for this question.

#### 2.14.5.3 Option 2:

#### **Key Issue 4D Option 2**

14 dwellings / 0.5 hectares of land in all settlements

One person supports this option.

One respondent opposes a threshold of 15 in smaller settlements, especially when there are few allocated sites.

#### 2.14.5.4 Option 3:

# **Key Issue 4D Option 3**

- 15 dwellings / 0.5 hectares of land for settlements with a population over 3,000;
   and
- 6 dwellings or more in settlements with a population of 3,000 or less

One respondent supports this option as it is consistent with recent government advice and PPS3. They suggest further reduction in rural areas must be justified by local housing needs.

There were two comments of undetailed support for this option.

#### 2.14.5.5 Option 4:

#### **Key Issue 4D Option 4**

- 20 dwellings / 0.66 hectares of land for settlements with a population over 3,000;
   and
- 6 dwellings or more in settlements with a population of 3,000 or less

No comments.

### 2.14.5.6 No Option Preferred:

One respondent feels the affordable housing policy should be applied to suitable sites.

Another respondent suggests amendments to targets set by the Housing Needs Assessment are unjustified.

One respondent suggests a threshold of 15 dwellings in settlements with population of 3000 or greater and 10 dwellings in smaller settlements, taking into account site specifics and local housing need; these accord with national planning guidance.

One respondent suggests thresholds should be taken from national and regional policy, typically justified at 15 dwellings and 0.5ha.

One respondent supports both options 2 and 3.

## Officer Response

The Strategic Housing Market Assessment, providing evidence of the huge need for affordable housing, was produced in December 2007. The Council held a workshop on Affordable Housing Policy and the Local Development Framework on 10 July 2008 to discuss policy options. The Council intends to follow this by commissioning an Affordable Housing Viability Study to ensure that its policies would deliver the optimum viable levels of affordable housing whilst not undermining overall housing delivery and to meet the requirements of PPS3. A Viability Study will help determine appropriate qualifying thresholds.

# 2.14.6 Summary of Response (Key Issue 4E)

#### **Kev Issue 4E**

What type of affordable housing is needed most?

#### 2.14.6.1 General:

One respondent suggests there should be a mix of options 2 and 3 since it is government policy to extend home ownership and this would address structural issues.

Another respondent feels this issue should be best informed by the Housing Needs Study/Local Housing Strategy.

#### 2.14.6.2 Option 1:

#### **Key Issue 4E Option 1**

Social rented (e.g. rented from a Registered Social Landlord/Housing Association

There was one comment of undetailed support for this option.

One respondent supports option 1 and commented that if there was no home ownership, only rented properties, society may not be in the dire position it is in.

#### 2.14.6.3 Option 2:

# Key Issue 4E Option 2

Shared ownership/Homebuy (i.e. buy a share of the property and pay rent on the remaining share you do not own)

There were four comments of undetailed support for this option.

One respondent prefers option 2 as the Housing Needs Assessment identified that there is a demand for owner occupied homes.

# 2.14.6.4 Option 3:

# **Key Issue 4E Option 3**

Sub market renting (i.e. subsidised housing above social rent, but below market rent)

There was one comment of support for this option.

## 2.14.6.5 No Option Preferred:

One respondent suggests the tenure split should have regard to the Housing Needs Survey.

Another respondent commented that an up-to-date Housing Need assessment should be taken into consideration for an appropriate tenure split. The assessment should be reviewed annually so that it reflects up-to-date requirements. A flexible approach should be taken, and consideration made on a site-by-site basis, which in the end, is more likely to produce a higher provision of affordable housing.

Two respondents consider that all types are required. This work needs market research.

One respondent states there is an affordability gap between average income and house price; to address this, a mix of affordable housing should be provided, mainly shared ownership/Homebuy dwellings. This would encourage key workers into the district. The proportion of affordable dwellings in the district should take into consideration the Housing Needs Survey.

One respondent supports both Options 1 & 2 (social rented and shared ownership/Homebuy).

#### Officer Response

The Strategic Housing Market Assessment, providing evidence of the huge need for affordable housing, was produced in December 2007. The Council held a workshop on Affordable Housing Policy and the Local Development Framework on 10 July 2008 to discuss policy options. The Council intends to follow this by commissioning an Affordable Housing Viability Study to ensure that its policies would deliver the optimum viable levels of affordable housing whilst not undermining overall housing delivery and to meet the requirements of PPS3. Further work will be undertaken to consider whether the priority should be social rented housing, intermediate or both. It will be necessary to establish overall targets and requirements whilst allowing for negotiation and potential flexibility in individual cases where it is shown that viability issues exist.

# 2.14.7 Summary of Response (Key Issue 4F)

#### **Key Issue 4F**

What is the best way to provide small Rural Exception Sites to meet identified local needs for affordable housing?

#### 2.14.7.1 Option 1:

# **Key Issue 4F Option 1**

The Council should only rely on a criteria based policy for releasing sites

Five respondents suggest the Council should only rely on a criteria based policy for releasing sites.

### 2.14.7.2 Option 2:

#### **Key Issue 4F Option 2**

The Council should allocate land for development in addition to a criteria based policy

There was one comment of undetailed support for this policy.

One respondent supports the option that the Council should allocate land for development in addition to a criteria based policy; if landowners are in agreement and there is flexibility in type of affordable housing provided.

# 2.14.7.3 No Option Preferred:

One respondent believes the Council should not prescribe dwelling types as they are not sufficiently resourced to do this and have little understanding of housing markets.

One respondent comments that neither option is preferable although Option A is the 'least worst'.

# Officer Response

Through on-going work with the Oxfordshire Rural Community Council, Housing Associations, Parish Councils and landowners, the Council is concerned that without changes to national planning policy, allocating land for Rural Exception Sites will increase the 'hope value' for market housing. It is considered that a proactive, criteria based policy would be more effective in delivering sites, particularly once there is more certainty from the LDF on where market allocations are likely to be.

#### 2.14.8 Summary of Response (Key Issue 4G)

#### **Key Issue 4G**

What type of housing is most required in the following locations?

#### 2.14.8.1 General:

One respondent suggests a district wide mix policy should be identified rather than a specific one dealing with identified locations. Flexibility is required and so consideration should be made on a site by site basis.

Another respondent states a mix of types and sizes should be provided in all locations for a balanced community. Another person adds that tenure or size needs to be identified by housing market assessment.

One respondent agrees large development sites should provide a range of housing types and sizes. Demand will change during the Plan period. PPS3 states there should be a mix and this should be subject to pre-application discussions. There may be continuous demand for bungalows but demands cannot be met whilst complying with government requirements.

Two respondents comment that large development sites will need a range of housing in delivering mixed, sustainable communities. The exact mixture will depend on the site.

One respondent comments that up to date market research is required. Another agrees, and adds that in general a range of house types would be required.

Another respondent states that an up-to-date Housing Need assessment should be taken into consideration for an appropriate tenure split. This should be reviewed annually. A flexible approach should be taken, and consideration made on a site-by-site basis.

One person explains that flats are most required for singles, 1 or 2 bed bungalows and houses are most required in Banbury.

#### 2.14.8.2 Banbury:

#### 2.14.8.2.1 Houses

One respondent suggests family homes, with gardens, garages and parking, appear to be most required.

Another respondent comments that the Housing Market in Banbury is slow in selling town houses and apartments.

One respondent believes houses are the most required house type in Banbury.

There was one comment of undetailed support for this option.

#### 2.14.8.2.2 Flats

No comments.

#### 2.14.8.2.3 Maisonettes

No comments.

## 2.14.8.2.4 Bungalows

No comments.

#### 2.14.8.2.5 Bedsits

No comments.

# 2.14.8.3 Bicester:

### 2.14.8.3.1 Houses

One respondent believes houses are the most required type in Bicester.

#### 2.14.8.3.2 Flats

No comments.

#### 2.14.8.3.3 Maisonettes

No comments.

#### 2.14.8.3.4 Bungalows

No comments.

### 2.14.8.3.5 Bedsits

No comments.

### **2.14.8.4 Kidlington:**

# 2.14.8.4.1 Houses

One respondent believes houses are the most required type in Kidlington.

### 2.14.8.4.2 Flats

No comments.

#### 2.14.8.4.3 Maisonettes

No comments.

### 2.14.8.4.4 Bungalows

No comments.

# 2.14.8.4.5 Bedsits

No comments.

### 2.14.8.5 Rural Areas (North):

#### 2.14.8.5.1 Houses

Two respondents suggest that the market is slow on selling town houses and apartments, therefore houses are required in rural areas. Villages do have a reasonable stock of 1980-90's housing available.

#### 2.14.8.5.2 Flats

No comments.

#### 2.14.8.5.3 Maisonettes

No comments.

#### 2.14.8.5.4 Bungalows

No comments.

#### 2.14.8.5.5 Bedsits

No comments.

### 2.14.8.6 Rural Areas (South):

#### 2.14.8.6.1 Houses

No comments.

#### 2.14.8.6.2 Flats

No comments.

# **2.14.8.6.3 Maisonettes**

No comments.

# **2.14.8.6.4 Bungalows**

No comments.

## 2.14.8.6.5 Bedsits

No comments.

#### Officer Response

The Council does not have detailed information on the profile of the existing housing stock and it is agreed that a district wide approach would be more appropriate than a sub-district breakdown. In addition to considering the results of the Strategic Housing Market Assessment (2007), the Council will consider whether further work should be

commissioned to arrive at a suitable mix of housing that policies should seek to deliver. There would still be the potential to require more specific, reasonable requirements for individual strategic sites should there be justifiable evidence.

### 2.14.9 Summary of Response (Key Issue 4H)

#### **Key Issue 4H**

In considering new houses, what size is most required in the following locations?

#### 2.14.9.1 General:

One respondent comments that large development sites should provide a range of housing types and size. Demand will change over the plan period. Para 40 of draft PPS3 states dwelling mix should be subject to pre-application discussions. They suggests that developers would automatically take into account demand for one, two and three bedroom homes in the district and so it does not need to be specified in the document.

One respondent suggests larger sites including urban extensions should have a range of housing in order to deliver sustainable development.

One respondent states that in accordance with draft PPS3, an up-to-date Housing Market Assessment should be undertaken to determine house type requirements. It is important that the assessment is reviewed annually to reflect current requirements. A flexible approach is required to allow consideration on a site by site basis.

One respondent says research has not been carried out to answer this question.

One respondent expresses confusion over the question. If it is an estimate of future demand, careful assessment of the sample is required. If it is an invitation to comment on where demand may arise then it may be difficult to assess how the general public can express a sound view on the matter, as it is difficult even for those in the housing market to estimate.

#### 2.14.9.2 Banbury:

Two respondents suggest 2 and 3 bedroom housing are most sought after and sell best, followed by 4 bedroom housing.

Another respondent suggests 3 bedroom housing is mostly required. An urban extension to the north would require a range of housing types.

One respondent suggests a mix of housing is required for Banbury.

#### 2.14.9.3 Bicester:

One respondent suggests 2 and 3 bedroom housing is most required for Bicester.

#### **2.14.9.4 Kidlington:**

No comments.

#### 2.14.9.5 Rural (North):

No comments.

#### 2.14.9.6 Rural (South):

No comments.

#### Officer Response

The Council does not have detailed information on the profile of the existing housing stock and it is agreed that a district wide approach would be more appropriate than a sub-district breakdown. In addition to considering the results of the Strategic Housing Market Assessment (2007), the Council will consider whether further work should be commissioned to arrive at a suitable mix of housing that policies should seek to deliver. There would still be the potential to require more specific, reasonable requirements for individual strategic sites should there be justifiable evidence.

# 2.14.10 Summary of Response (Key Issue 4I)

#### Key Issue 41

Should it be necessary to allocate land away from the district's towns and larger villages, what option should the Council pursue?

#### 2.14.10.1 General:

Two respondents suggest the Banbury and North Cherwell Site Allocations DPD should identify strategic sites adjacent to the built up area of the town. They should be well planned mixed use urban extensions with good links to public transport routes to town centre and main employment areas and the Banbury Railway Station.

Another respondent argues that there are sufficient suitable sustainable locations for planned extensions to urban areas, it is not necessary to identify further sites in less sustainable locations.

One respondent suggests urban extensions are preferred secondary locations to land within urban areas, rather than Greenfield settlements.

Two respondents support the idea that urban extensions are likely to be the next sustainable option for accommodating growth after 2026 after previously developed land and buildings within urban areas have been maximised. In assessing potential urban extension a number of issues need to be considered, accessibility to services and public transport, infrastructure capacity, environmental constraints.

One respondent suggests the Core Strategy will need to be flexible to the changing circumstances in previously developed land. Deliverability may be delayed as these sites maybe unviable. Although the Core Strategy will have to deliver housing in accordance to the Structure Plan and South East Plan, this shouldn't allow the release Greenfield sites in unsustainable locations.

One respondent believes previously developed land should be used first. It is not sensible to be prescriptive but a sequential process should be carried out.

One respondent opposes any allocation of a significant amount of land away from Banbury and Bicester. There are enough deliverable sites adjoining Banbury and Bicester that can be developed as urban extensions in accordance with PPG3 sequential approach.

One respondent states that in consideration of this option, it is necessary to ensure the potential available previously developed land on the edge of urban area is fully optimised, where accessibility should be a key consideration. Suggest Bicester Airfield.

One respondent comments that the LDF should not prevent Greenfield land being released, especially where there is a history of low completions or worsening affordability. It will be necessary to allocate land away from the larger towns and this should be around nodes of good public transport corridors.

#### 2.14.10.2 Option 1:

### **Key Issue 4I Option 1**

Develop on previously developed land around nodes in good public transport corridors

There was one comment of undetailed support for this policy.

Two respondents suggests developing on previously developed land (PDL) around nodes in good public transport corridors (Option 1) and then develop on sites which will secure the best possible development around nodes in good public transport corridors (Option 2).

Two other respondents agree on developing on PDL around nodes in good public transport corridors (Option 1) in Suburban areas. They suggest developing on sites which will secure the best possible development around nodes in good public transport corridors (Option 2) in urban areas. A definition of Suburban and Urban should be included.

One respondent supports this option, stating that PDL is a key component of Government policy, and should be developed before Greenfield sites. There should be a full appraisal of the ability of Shipton on Cherwell quarry to accommodate a new settlement. The quarry should be identified in the SEA and compared with other options.

One respondent supports option 1 as the alternative provides for development on Greenfield land.

Another respondent comments that option 1 is appropriate provided that there are no PDL sites within the settlements suitable for development, and no appropriate locations for the provision of sustainable urban extension.

## 2.14.10.3 Option 2:

#### **Key Issue 4I Option 2**

Develop on sites which will secure the best possible development around nodes in good public transport

There were 6 comments of undetailed support for this option.

One respondent suggests developing on PDL around nodes in good public transport corridors (Option 1) and then develop on sites which will secure the best possible development around nodes in good public transport corridors (Option 2).

Another respondent supports developing on sites which will secure the best possible development around nodes in good public transport corridors as there may not be PDL in towns and villages in most need of housing development or in the most sustainable locations.

One respondent supports the allocation of sites that will deliver development in the most sustainable manner, in accordance with PPG3. The land should be readily available in the plan period. Greenfield land should not be ruled out through an overly restrictive policy approach.

#### 2.14.10.4 No Option Preferred:

Three respondents propose an additional option which is "Develop on sites which offer the most sustainable development". Planned extensions to existing towns and villages are generally considered more sustainable after making use of previously developed land in urban areas. Neither option is supported as the sustainability of the site should be the most important factor.

Another respondent comments that in urban areas, priority should be development on PDL before Greenfield sites. Outside urban areas priority should be development in the most sustainable locations, whether or not Brownfield land is available. The criteria to assess sustainability in PPS1 should be used.

Two respondents agree that it is not considered appropriate in the context of the emerging South East Plan to redirect growth of towns to sites away from Banbury at locations that may be identified as nodes along public transport corridors. The Urban Housing Potential Study 2005 has not identified in the Category 1 settlements a strategic site that could be considered in those terms.

#### Officer Comment

Since the issues and options paper was produced, Planning Policy Statement 3 has been finalised and published. The PPS underpins the Government's response to the *Barker Review of Housing Supply* and achieving a 'step-change' in housing delivery. PPS3 provides new national policy which guides local decisions about planning for housing, including identifying the most sustainable strategic locations for housing growth. Of particular note, is that while priority should still be given to prioritising previously developed land, the former sequential test (para 30 Planning Policy Guidance note 3 (2000)) no longer exists. There is now a broader emphasis on achieving sustainable development (including reducing carbon emissions) and meeting the vision and objectives for the area. PPS3 stresses the importance of identifying suitable sites that are deliverable and developable.

### 2.14.11 Summary of Response (Key Issue 4J)

# Key Issue 4J

What is the minimum density that would be provided in the following locations?

#### 2.14.11.1 General:

One respondent suggests that ranges should accord with PPG3, but there should be an explanation of when higher or lower densities would be appropriate.

One respondent comments that ranges should depend on the context of the individual sites; densities of less than 30dph or higher than 45dph may be appropriate.

Two respondents feel that flexibility should be built into the policy to allow for lower than prescribed densities, if they would result in a detrimental effect on the character of the area. Flexibility would prevent 'shoe horning' extremely high density development within a low density area, thus creating an imbalance.

One respondent states that densities should reflect the guidance set out in Annex C of draft PPS3 with reference to flexible targets. Densities should also be based on individual site merits – a static target is unrealistic and simplistic. Additionally, town centre development can easily exceed 50 dph. Consideration should also be given to assessing density through "habitable rooms per hectare" and "population per hectare".

One respondent suggests targets should be based on individual site characteristics as well as the needs of an area. Additionally, setting targets above the levels proposed in draft PPS3 is unrealistic. Therefore, the minimum density options should be amended to be; 30dph (rural), 35dph (suburban) and 40dph (urban). In some circumstances even lower densities may be appropriate.

Two respondents feel the targets proposed are too cautious when compared with those put forward in PPS3. Density targets should also be varied according to location, character of the area, accessibility to public transport, design, environmental constraint, and the level of nearby service provision.

Another respondent suggests that densities should be commensurate with the capacity and constraints of a site, the nature of its surroundings and its sustainability credentials. Additionally, minimum densities in urban areas could be increased.

Several respondents comment that the Council should better acknowledge the advice of PPG3 (current policy is for a density of between 30 and 50 dph until the advice is amended). PPG3 and emerging PPS3 state that target ranges are not necessary. PPG3 states that local developers and planners should think imaginatively about designs and layouts which make more efficient use of land without compromising the quality of the environment. At the same time, it provides a framework for each location to be considered on its own merits. CDC should stay with these indicative ranges rather than trying to prescribe higher ranges. One respondent believes that densities should accord with PPG3 or its successors, meaning, at present, a minimum density of 30 dwellings per hectare. Higher densities may be appropriate in particular locations, as may lower densities.

Densities should be in accordance with the guidance contained in PPG3. The minimum density of 30dpha should be permissible in rural areas whilst there should be a higher minimum density in urban areas of at least 45dpha.

Another respondent suggests the Council should proceed with caution as policy advice will change during the course of LDF progression. However, advice in PPG3 is considered to be an appropriate starting point. Any policy should also retain flexibility to respond to the individual merits of each site and the development proposed. Densities should reflect aspirations for the District as a whole. Densities should be a product of high quality design and if this approach is adopted then the District Council's aspiration of making best use of land will be met without detriment to the quality of the residential environment.

One respondent feels that each site should be considered on its own merits and densities should demonstrate ambition in terms of density and land use efficiency. There should be a distinction made between respecting existing character and appearance and the need for creation of a different character and appearance where necessary, appropriate and/or acceptable.

One respondent comments that the ranges accord with emerging national guidance; however, policies should also be sufficiently flexible to account for local circumstances.

One respondent feels the Council should not be too prescriptive as this is the antithesis of achieving the wider objectives of better design and more liveable communities.

#### 2.14.11.2 Rural Locations:

Option A.) 30 dph; or Option B.) 35 dph

There was one undetailed comment of support for Option A.

One respondent supports A; being the lowest minimum density possible.

There was one undetailed comment of support for Option B.

Another respondent supports the higher end of the two options in each location (i.e. B).

Two respondents support a range of 30-40 dph as this is consistent with the guidance in draft PPS3.

# 2.14.11.3 Suburban Areas:

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Option A.) 35 dph; or
Option B.) 40 dph
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Strong support for setting the lowest minimum densities possible, i.e. Option A.

Support for Option A, but the Core Strategy will need to explain the distinction between Suburban Areas and Urban Locations. As a matter of normal definition, "suburban areas" are within "urban locations".

There were two undetailed comments of support for Option B.

Some support for the higher end of the two options in each location (i.e. B).

#### 2.14.11.4 Urban Locations:

Option A.) 40 dph; or Option B.) 45 dph

There was one undetailed comment of support for Option A.

Strong support for setting the lowest minimum densities possible, i.e. Option A.

Support for Option B, but the Core Strategy will need to explain the distinction between Suburban Areas and Urban Locations. As a matter of normal definition, "suburban areas" are within "urban locations".

Some support for the higher end of the two options in each location (i.e. B).

There was one undetailed comment for 45dph (i.e. Option B).

# **Officer Comment**

Since the issues and options paper was produced, Planning Policy Statement 3 has been finalised and published. It states that Regional Spatial Strategies should set out the regions housing density policies, including any target. The Draft South East Plan (as proposed to be changed by the Secretary of State) includes an overall regional target of 40 dwellings per hectare (policy H5). PPS3 states that Local Planning Authorities should develop their own density policies having regard to specified considerations. It also states that they may wish to set out a range of densities across the plan area rather than one broad density range but that 30 dwellings per hectare (net) should be used as a national indicative minimum until local density policies are in place. In developing policies, there will be a need to ensure that effective and efficient use of land is made, while ensuring there is sufficient flexibility to take into account the character and appearance of different areas of the district and, where necessary the needs of individual sites.

#### 2.14.12 Summary of Response (Key Issue 4K)

# Key Issue 4K

In seeking to meet the requirements of the elderly, those with special need and the homeless, which of the following options would you prefer?

#### 2.14.12.1 General:

One respondent suggests identifying a specific site in an area based on need. It may be preferable to identify an individual site in an area where provision is most needed.

One respondent comments that all sites must be close to shops and medical facilities.

Another respondent suggests this is a complex issue since different priorities should be given to those with special needs, then the elderly, and then to varying types of homelessness.

# 2.14.12.2 Option 1:

# **Key Issue 4K Option 1**

Allocate land or buildings to meet specific, deliverable requirements

One respondent supports option 1, but comments that this should be subject to landowner agreement.

There was one undetailed comment of support for Option 1.

# 2.14.12.3 Option 2:

### **Key Issue 4K Option 2**

Provide specific planning policies to facilitate the provision of necessary accommodation

One respondent supports option 2 and greater discussions with developers. Option 2 would enable discussions with developers on the provision of housing to meet these needs. Specific allocations, however, may sterilise land if funding for special needs accommodation is not available.

One respondent comments that a planning policy is necessary to facilitate the provision of needed accommodation without pre-empting the market.

There were 3 undetailed comments of support for Option 2.

#### 2.14.12.4 No Option Preferred:

No comments.

#### **Officer Comment**

Since the issues and options paper was produced Planning Policy Statement 3 has been finalised and published. It seeks to widen opportunities for homeownership and to ensure high quality housing for those who cannot afford market housing, in particular those who are in vulnerable or in need. It seeks to create sustainable, inclusive, mixed communities and states that Local Planning Authorities should plan for a mix of housing which responds to household need including the requirements of specific groups including older and disabled people. The Core Strategy will need to develop in a way that addresses the needs of the whole Cherwell community. It is likely that in general targeted policies will be more effective in achieving mixed communities than land allocations (for example,

requiring a certain mix of housing), but the possibility of allocations should not be ruled out where local circumstances require a specific, site based solution.

# 2.14.13 Summary of Response (Key Issue 4L)

#### Key Issue 4L

Where need is established, what strategic option would you prefer in allocating land for Gypsy and Traveller provision?

#### 2.14.13.1 General:

With regards to low income members of the travelling community, one respondent comments that only three sites in the Banbury and North Cherwell District is inadequate provision. Furthermore private sites are not appropriate as the residents may be on very low incomes and may have to pay the rent charge deficits themselves. CDC should provide for low income members of the community, just as they do for the settled community. Additionally a range of sites should be built to cater for a range of needs, incorporating pitches suitable for the elderly.

One respondent suggests a larger number of small sites rather than one large site. They recommend a site with 6-10 plots as being favourable for most families. Additionally, large sites can be difficult to manage, particularly if there are tensions between the residents.

One respondent recommends the provision of transit sites, as many Gypsies and Travellers are travelling to find work but want to lawfully carry on their nomadic customs. Transit sites would allow them to stay for a short time and to pay for the amenities available.

One respondent comments that this is a problem on a large scale which CDC should not try to solve on its own but should work with the County Council.

Another respondent argues that the strategy for development in rural settlements needs to look more thoroughly at the issue than the narrowly defined alternatively presented.

### 2.14.13.2 Option 1:

### **Key Issue 4L Option 1**

Allocate land in the main urban areas

There were two undetailed comments of support for Option 1.

# 2.14.13.3 Option 2:

# **Key Issue 4L Option 2**

Allocate land on the edge of the main urban areas

There was one undetailed comment of support for Option 2.

Option 2 considers the needs of both the travelling and the settled community: Most Gypsy and Traveller families want to be close to local services but not too centrally within the built up area, and so Option 2 is supported. However, these sites should not be on land considered unsuitable for other development (i.e. too close to the motorway, electrical substations and pylons, or close to refuge tips or sewage works).

#### 2.14.13.4 Option 3:

### **Key Issue 4L Option 3**

Allocate land in sustainable rural locations

There was one undetailed comment of support for Option 3.

One respondent comments that the gypsy lifestyle is not compatible with urban living, and also deposits should be paid against clean up costs.

### 2.14.13.5 No Option Preferred:

One respondent supports a combination of all three options, including a 'rounding off' of development on the fringes of settlements.

# Officer Response

The South East England Regional Assembly (SEERA) is about to consult on the accommodation needs of Gypsies and Travellers and Travelling Showpeople to inform a partial review of the South East Plan. This review is being undertaken in response to Government policy which requires the needs of the travelling communities to be comprehensively assessed and which places a responsibility of Local Planning Authorities to identify sites to meet those needs. Government circulars (ODPM 01/2006 & DCLG 04/2007) provide guidance on site identification. The Council will consider this guidance as well as the completed South East Plan review in site identification and will consult with the travelling communities and partner organisations such as the County and Parish Councils.

#### **2.15 Key Issue 5**

The need to promote the role of town centres and local shopping facilities

# 2.15.1 Summary of Response (General)

One respondent feels that provision should be made at all local villages to meet local needs.

One respondent suggests that development should be primarily in urban areas, where there is the necessary transport infrastructure. The provision of homes and employment should be balanced.

Another respondent suggests the protection of cultural facilities should also be referred to, as Key Issue 5 is related primarily to retail and commercial activities.

One respondent resubmits their representation to the Local Plan process regarding the contribution that garden centres make to a more diverse rural economy.

#### 2.15.2 Summary of Response (Key Issue 5A)

#### **Key Issue 5A**

What should be the role of the main centre of **Banbury?** 

#### 2.15.2.1 General:

One respondent comments that provision will be determined according to the market and CDC should also follow a sequential approach. Option 2 appears to provide the best balance but the questions are too detailed.

Another respondent suggests there is a lack of evening activities in Banbury.

#### 2.15.2.2 Option 1:

### **Key Issue 5A Option 1**

To be retained as the main location for principally retail provision

One respondent supports option 1 (retaining existing centres).

There was one comment of undetailed support for this option.

#### 2.15.2.3 Option 2:

### **Key Issue 5A Option 2**

To provide more diversity of uses through a greater emphasis on the development of leisure facilities, including pubs, restaurants, cinemas etc

There were three comments of undetailed support for this option.

#### 2.15.2.4 Option 3:

#### **Key Issue 5A Option 3**

To provide a wide range of diversity with the provision of housing, cultural and community facilities including the range of leisure uses set out in Option 2

One respondent suggests that Banbury Town Centre should have the widest role as a focus for development. It needs to be diverse to withstand pressure and to prevent social problems associated with centre decline.

One respondent comments that Banbury is the most sustainable location for diverse development and Option 3 is in accordance with government guidance.

Another respondent suggests that option 3 provides for the most diverse uses and is in accordance with Structure Plan policy. Diverse uses in centres, with adequate community facilities, will improve accessibility for residents of the town and surrounding villages. Congestion will also be reduced.

One respondent supports option 3, which could be achieved by retaining and enhancing the historic core of the town.

There were two comments of undetailed support for this option.

There was one comment of undetailed support for this option (after Option 2).

#### 2.15.2.5 No Single Option Preferred:

One respondent suggests Banbury should continue to be the main centre for retail activity and should include the mix of uses proposed in Options 2 & 3.

# 2.15.3 Summary of Response (Key Issue 5B)

#### Key Issue 5B

What should be the role of the main centre of Bicester?

#### 2.15.3.1 General:

One respondent suggests there should be an increase in facilities and services in Bicester in light of the SE Plan proposals.

Another respondent feels that attention should be paid to PPS6 and a full assessment of need and supply of retail, leisure and other town centre uses should be undertaken.

One respondent comments that the Centre of Bicester is currently being changed drastically.

# 2.15.3.2 Option 1:

### **Key Issue 5B Option 1**

To be retained as the main location for principally retail provision

One respondent prefers Option 1, suggesting that Bicester should accommodate a range of retail uses. They recognise that it is positioned below Banbury in the hierarchy. Some of the leisure facilities identified in Option 2 could be located and supported by Bicester's economy but a cinema would be better located in a sub-regional centre.

There was one comment of undetailed support for this option.

#### 2.15.3.3 Option 2:

#### **Key Issue 5B Option 2**

To provide more diversity of uses through a greater emphasis on the development of leisure facilities, including pubs, restaurants, cinemas etc.

There was one comment of undetailed support for this option.

#### 2.15.3.4 Option 3:

#### **Key Issue 5B Option 3**

To provide a wide range of diversity with the provision of housing, cultural and community facilities including the range of leisure uses set out in Option 2

There was one comment of undetailed support for this option.

#### 2.15.4 Summary of Response (Key Issue 5C)

### **Key Issue 5C**

What should be the role of the main centre of Kidlington?

# 2.15.4.1 Option 1:

### **Key Issue 5C Option 1**

To be retained as the main location for principally retail provision

No comments.

#### 2.15.4.2 Option 2:

### **Key Issue 5C Option 2**

To provide more diversity of uses through a greater emphasis on the development of leisure facilities, including pubs, restaurants, cinemas etc

There were two comments of undetailed support for this option.

# 2.15.4.3 Option 3:

#### **Key Issue 5C Option 3**

To provide a wide range of diversity with the provision of housing, cultural and community facilities including the range of leisure uses set out in Option 2

There were two comments of undetailed support for this option.

# 2.15.5 Summary of Response (Key Issue 5D)

#### **Key Issue 5D**

What do you consider the role of other centres to be within the district?

### 2.15.5.1 General:

One respondent encourages development in the more sustainable rural settlements to enhance their sustainability, without threatening viability of existing centres or having a negative environmental impact.

One respondent suggests no development outside of existing centres unless it can be supported by a strong package of transport measures, although provision of local services may be required to cater for needs of local communities.

Another respondent suggests development should be encouraged where it would enhance viability, although transport policies should also be a consideration.

#### 2.15.5.2 Option 1:

### **Key Issue 5D Option 1**

To maintain the current level of services within district and village centres

There were two comments of undetailed support for this option.

#### 2.15.5.3 Option 2:

#### **Key Issue 5D Option 2**

To allow modest growth in the range and scale of facilities available within district and village centres

One respondent suggests additional facilities and services should be encouraged in rural settlements, reducing the need to travel and therefore contributing to the creation of sustainable communities.

There was one comment of undetailed support for this option.

#### 2.15.5.4 Option 3:

### **Key Issue 5D Option 3**

To identify key centres for significant expansion

One respondent supports expansion particularly in the form of a major multipurpose sports facility which could be central.

#### 2.15.6 Summary of Response (Key Issue 5E)

### Key Issue 5E

Where should the future growth of **Banbury** be located?

#### 2.15.6.1 General:

One respondent suggests centralised locations, as these are the most sustainable in transport terms.

Another respondent suggests an audit of infrastructure should be undertaken before more building is allowed. Large developments on the urban fringe represent the best way of achieving development and the associated facilities- although they should be tightly phased so as to maintain a tight urban edge.

# 2.15.6.2 Option 1:

#### **Key Issue 5E Option 1**

Restrict development to serve local needs

One respondent comments that the continuous, characterless growth of recent years should not continue although a significant increase in housing provision in Banbury will prove hard to resist.

Another respondent suggests natural growth rather than expansion as the town is struggling to cope with the growth it has sustained to date.

#### 2.15.6.3 Option 2:

### **Key Issue 5E Option 2**

Focus major development proposals wholly within the central areas by redeveloping existing sites

There were two comments of undetailed support for this option.

### 2.15.6.4 Option 3:

#### **Key Issue 5E Option 3**

Promote the expansion of the centres by the identification of additional locations to accommodate future growth

One respondent believes the Council should facilitate the expansion of Banbury.

One respondent feels the Council should allow for expansion of Banbury centre into Canalside.

There were three comments of undetailed support for this option.

# 2.15.6.5 No Option Preferred:

One respondent suggests that option 2 and 3 should be combined. Retail and leisure growth should be located in central areas where there is ease of access. This means making use of redevelopment opportunities although suitable sites may also exist on the fringes.

# 2.15.7 Summary of Response (Key Issue 5F)

# Key Issue 5F

Where should the future growth of Bicester be located?

## 2.15.7.1 Option 1:

# **Key Issue 5F Option 1**

Restrict development to serve local needs

No comments.

#### 2.15.7.2 Option 2:

#### **Key Issue 5F Option 2**

Focus major development proposals wholly within the central areas by redeveloping existing sites

No comments.

# 2.15.7.3 Option 3:

# **Key Issue 5F Option 3**

Promote the expansion of the centres by the identification of additional locations to accommodate future growth

There were three comments of undetailed support for this policy.

### 2.15.7.4 No Option Preferred:

One respondent supported both Options 2 & 3.

Another respondent supported both Options 1 & 2.

#### 2.15.8 Summary of Response (Key Issue 5G)

### Key Issue 5G

Where should the future growth of Kidlington be located?

#### 2.15.8.1 Option 1:

#### **Key Issue 5G Option 1**

Restrict development to serve local needs

There were two comments of undetailed support for this option.

# 2.15.8.2 Option 2:

#### **Key Issue 5G Option 2**

Focus major development proposals wholly within the central areas by redeveloping existing sites

No comments.

#### 2.15.8.3 Option 3:

### **Key Issue 5G Option 3**

Promote the expansion of the centres by the identification of additional locations to accommodate future growth

There were two comments of undetailed support for this option.

#### Officer Response

A range of comments regarding the role of Banbury Town Centre were received, and the general consensus is that in order to remain competitive, it is believed, the centre should have a wide and diverse role, with a range of service and facilities. Policy for Banbury Town Centre will be developed further in later stages.

Fewer comments were received with respects to the role of Bicester Town centre; although widening the range of retail and leisure on offer has been highlighted. The policy for Bicester Town Centre will be developed further in the later stages. It has long been an aspiration for the council to see Land at Bure Place Car Park redeveloped to increase the range of uses in the town centre and it is likely that this will play a key part in the strategy for the Town Centre.

For Kidlington, Option 2 received the most support, although overall there was a low response to this question. Again, the policy for the village centre will be developed further in the later stages.

Since the publication of the *Issues and Options* paper the council has a final version of PPS6 Assessment; this will inform policy approach the council takes for the various urban centres.

Various comments were received regarding the role of other rural centres in the district, comments support development in the more sustainable locations and have emphasised the importance of public transport links. The council agrees with the principle of sustainable commercial development in rural areas. The development of policies for the rural areas will be considered in later stages.

When asked about the future growth of Banbury Town Centre, there were a mix of views, some believed there should be steady growth within central areas and some supported expansion, e.g. canalside location. The PPS 6 assessment will help inform of appropriate locations for growth/redevelopment, any strategic locations will be set out in the draft Core Strategy.

No comments were received in response to questions asking how Bicester and Kidlington centres could grow. Again, the PPS assessment will help inform of appropriate locations for growth/redevelopment, any strategic locations will be set out in the draft Core Strategy.