

Cherwell Local Plan Review 2040
Planning for Cherwell to 2040 - A Community Involvement Paper
July 2020

Representation Form

Cherwell District Council has prepared a document called *Planning for Cherwell to 2040: A Community Involvement Paper* which is the first stage of consultation to inform a new district wide Local Plan.

We wish to engage with our local communities, partners and stakeholders. We want to ensure that a wide cross-section of views are obtained to help us identify, understand and examine the main social, environmental and economic needs that we will have to consider when we plan for Cherwell's future development needs. This Paper does not contain any proposals or policy options, but highlights needs and issues to stimulate discussion and debate.

We are also making a 'call for sites' and inviting comments on a Sustainability Appraisal Scoping Report.

These documents are available to view for comment from **Friday 31 July 2020 to 11.59pm Monday 14 September 2020.**

To view the Community Involvement Paper and the accompanying Sustainability Appraisal Scoping Report and Call for Sites form please visit www.cherwell.gov.uk/planningpolicyconsultation.

We are currently unable to place hard copy documents for viewing at our normal deposit locations due to COVID-19 restrictions.

How to use this form

Please complete **Part A** in full.

Then complete **Part B** for each question you wish to comment on.

PLEASE NOTE THAT ANONYMOUS OR CONFIDENTIAL COMMENTS CANNOT BE ACCEPTED. ANY COMMENTS RECEIVED WILL BE MADE PUBLICLY AVAILABLE.

The information you provide will be stored on a Cherwell District Council database and used solely in connection with the Cherwell Local Plan Review 2040.

Representations will be available to view on the Council's website, but address, signature and contact details will not be included. However, as copies of representations must be made available for public inspection, they cannot be treated as confidential. Data will be processed and held in accordance with the Data Protection Act 2018.

Your details will be added to our mailing list which means that you will be automatically notified of future stages of the local plan preparation process. If you subsequently wish to be removed from our mailing list, please contact us.

Please return completed forms:

By Email to: PlanningPolicyConsultation@cherwell-dc.gov.uk

Or by post to: Planning Policy Team, Planning Policy, Conservation and Design, Cherwell District Council, Bodicote House, Bodicote, Banbury, OX15 4AA.

If you have any questions about completing the form or accessing documents, please telephone 01295 227985 or email planning.policy@cherwell-dc.gov.uk.

Cherwell Local Plan Review 2040: Planning for Cherwell to 2040
A Community Involvement Paper Representation Form

PART A

	Details of the person / body making the comments	Details of the agent submitting the comments on behalf of another person / body (if applicable)
Title	Sir	
First Name	David	
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PART B – Please complete Part B for each question you wish to comment on

Question 1: Purpose of this Document – What planning policies might we need to help us if COVID-19 persists? What lessons can we learn to help us plan for the future?

Access to good quality green space

The public has understood the enormous mental and physical benefits of access to the countryside and high quality green space, and this needs to be reflected in policy-making. (See: <https://www.cpre.org.uk/news/we-want-richer-green-spaces/>)

The pandemic highlights the need for greater provision of accessible green spaces to meet the Standards for Open Space Provision. These standards are not met in many areas of the District. Data from ONS suggests that nationally, around 1 in 8 people lack access to a private or shared garden. In Bicester South, for example, this figure rises to 1 in 5, making the provision of quality green space even more important. (See: <https://www.ons.gov.uk/economy/environmentalaccounts/articles/oneineightbritishhouseholdshasnogarden/2020-05-14>)

The range of planting and thus the biodiversity of urban open spaces should be increased to bring health benefits to those who use them as well as increasing urban flora and fauna.

Supporting home working / reducing the need to travel

It seems likely that the drop in centralised office-based work will be long-term and this should be encouraged due to the reduced impacts of commuting.

This needs to be balanced with increased investment in digital connectivity, plus a creative approach to town centre management. For example, we should be developing ideas around village hubs, that can act as a base for multiple services. In our larger settlements, we should be planning for how under- utilised retail or office space can be re-developed as high-quality, centrally located housing provision and associated infrastructure including open space.

Focus on active / sustainable travel

Certain local roads should be designated as traffic-free. Pavements should be widened. Better maintenance of footpaths and cycleways are needed to facilitate walking and cycling. Long-distance paths in the District (see answer to Q3) should be preserved, well maintained, linked together and publicised to give residents a new opportunity for exercise and local travel.

It would help if all new residential developments had ideally a designated cycle route on main through roads or that the road itself was wide enough to take cars and cycles. The roads on the new Kingsmere Estate are not wide enough which must be a disincentive for residents to cycle. Middleton Stoney Road should have, for example, a segregated cycle track and not a white line painted in the gutter for cyclists.

ALL the present ESD Policies need to be enhanced considerably.

Question 2: Identification of Issues and Needs – What evidence do you think the Council needs to prepare the Cherwell Local Plan Review?

We note para 1.15: ‘1.15 – *Cherwell today remains a predominantly rural District although it is **one of the fastest growing areas in the South East***’

Shouldn't the main thrust of the opening consultation be about this issue? I.e. do residents want to remain living in a predominantly rural area or do they *want* to be one of the fastest growing areas in the SE? What benefits/drawbacks might this offer?

Para 1.16 states ‘*In the last twenty years the population of Cherwell has grown by over 16% and it is **forecast to grow further to approximately 170,000 by 2043.***’

What is this forecast growth based on? Office of National Statistics population projections? Household projections? Or merely self-imposed growth to justify jobs being created which increases population etc in ever increasing circles?

If this is to reflect the ambition set out in the Oxfordshire Local Industrial Strategy (LIS), CPRE rejects this as the strategy was not subject to scrutiny by the general public or local authority members (but developed in isolation by the Oxfordshire Local Enterprise partnership and signed off by government.)

First and foremost, the Council needs evidence that it has genuinely consulted its residents about its growth agenda and the perceived impacts/benefits. The Council, through its Leader Cllr Wood, is actively involved in promoting the OxCam Arc concept which is driving a doubling of Oxfordshire's housing and population by 2050. The impacts of this must be clearly evaluated and explained to Cherwell residents. It is not sufficient simply to pass the buck to the Oxfordshire 2050 Plan process, since this will inevitably have an enormous impact on the Cherwell LP 2040 and Cherwell DC is currently at the heart of Arc decision-making so its views will carry weight.

Cherwell Industrial Strategy (para 2.15) – we are concerned that this may set the goalposts before we get to Local Plan consultation stage, especially if it is based on the Oxfordshire LIS (see above). The LP Review should come first (where environment, social and economic factors can be considered as a whole) and then the Industrial Strategy flow from it, rather than other way round

Data on the following should be collected:

- Water resources and future need. Water quality: systematic monitoring of nitrogen and phosphate levels in ponds and watercourses across the district is required. It is not sufficient to leave this as a Wild Oxfordshire citizen science project.
- Sewage works capacity. Discharge of sewage from Thames Water works into the river system must be stopped.
- Air quality (both particulates and gases, ammonia, nitrogen oxides, carbon monoxide) monitoring across the district.
- Assess what areas are feasible and available for more tree planting.
- Health of the trees in the District – screening for pathogens (sudden oak death/ash die-back/
- The area of farmland and soil quality
- Pollution (incl. light pollution) and litter monitoring
- Tranquillity – changes in the District over time
- Area of Brown Field land available for future growth and its location relative to infrastructure resources.
- Flood Plains; required to prevent flooding in future.
- Locations of minor roads that access villages to understand the limits of potential future development.
- Present development water runoff capacity – re the expectation for more storms due to Climate Change and to prevent flooding especially downstream of watercourses.

Question 3: District Wide Planning Issues – Do you have any observations on the district-wide issues we have identified? Are there any others you would like to raise?

Housing

2.19-2.20 – we agree that the affordability of local housing remains an issue. However, as recent years have shown, *more* housing does not of itself equate to *more affordable*

housing. Cherwell has increased its housing stock substantially over recent years but no evidence is provided to suggest that this has had any impact on addressing affordability issues. The Council must therefore provide evidence on how continuing with its current growth strategy is likely to lead to different / better outcomes in the future.

A clear distinction must be drawn between housing need i.e. the number of houses required to meet the natural growth of Cherwell's existing population, and any housing requirement that may be imposed through Government-driven methodologies.

Housing density – Cherwell should raise its housing density policy, to make maximum use of scarce land resource and to support more sustainable communities. Alongside this should come more emphasis on high quality design and change the build and use standard from BREEAM 'very good' to 'Exceptional'.

2.21 – *'In our rural areas, villages are now predominantly places to live and commute from as the traditional rural economy has declined.'*

See also Para 2.97 on Rural Areas – *'We recognise that although the area is relatively affluent, high house prices and lack of public transport mean that those on limited incomes, and those seeking to live, work and access services locally, can be disadvantaged'*

We agree this is a challenge – surely this is where a good Local Plan should focus its efforts – re-building local communities, with services and facilities, to support home working and reducing the need to travel? Good public transport and connectivity is essential.

Land value capture is an important issue. We urge the Council to consider ways in which the benefit from the increased value of land allocated for planning can be shared with the local community, to support infrastructure and services.

Economy

Warehousing – We note Para 2.22 'Cherwell provides 34% of the total of 6.5 million square metres commercial floorspace in Oxfordshire.' And also para 2.76 'We have sought to attract higher technology and knowledge-based businesses to the town, but the predominant new employment use is large warehousing (B8).'

Further increase in warehouse provision in the District would unbalance the local economy and should be resisted. Promotion of high technology employment should replace storage and distribution uses of valuable land.

Agriculture - CPRE welcomes the stated intention to introduce policies that support agriculture and food production, and sustainable farm diversification. The recent pandemic has shown a requirement for good quality, locally grown food that also reduces food miles and so reduces pollution.

Transport

Rural transport should be considered separately as a key issue. This is vital given the high percentage of rural dwellers in the District, the high carbon cost of rural transport and wider issues of tranquillity, access to Oxfordshire's national landscapes, and enjoyment of heritage, nature and the countryside. Being realistic, private vehicle use is, and is likely to remain, the main option for travel for the majority of these residents for some time to come, and whilst viable alternatives do not exist, there should be no undue penalty for this. The focus will need to be on building up these alternative options, reflecting the established hierarchy of sustainable travel, reducing the need to travel, minimising journey distances and supporting modal shift to active travel / public transport. This will need to include measures such as:

- Better broadband to facilitate both home-working and leisure activities
- Increasing flexibility of services e.g. online medical consultations
- Increasing public transport links between market towns (not just spokes to Oxford)
- Establishing rural mobility hubs
- Integrated ticketing between companies/modes of travel
- Support for moving to electric vehicles (including not just cars, but e-bikes and scooters), including increasing provision of electric charging facilities
- Improving pedestrian/cycle links between villages and towns.
- Special regard for the requirements of our designated landscapes.

We appreciate that some of these matters will be picked up in the Oxfordshire Local Transport & Connectivity Plan, but it is important that they are also picked up as appropriate at the Local Plan level.

East West Rail MUST be made electric powered. The line must be used for freight to remove HGV traffic from the A34 and other roads in the District. It is incredibly short sighted not to do this during the construction phase.

Biodiversity & the Natural Environment

1. Biodiversity: Cherwell has adopted a Community Nature Plan and this should be completed and extended. Detailed policies for ensuring biodiversity gain are required. CPRE supports developers being given more detailed guidance on how to achieve this. Assessment of biodiversity improvement should not only rely on biodiversity net gain calculations. These can be misleading and used as a 'smoke screen' by developers. We suggest that employing more council ecologists would be money well spent in this time of ecological crisis. Along with increased provision of open space as per answer to Q1, CPRE asks that management and maintenance of open space is focussed on increasing biodiversity. The trend to reduce the frequency of mowing grass areas such as roadside verges in order to save costs may also benefit biodiversity, provided the mowing is done after wild flowers have set seed. A general policy for promoting biodiversity enhancement in all amenity and sports areas is needed. For example, perimeter areas should be

protected for wild flowers and boundary hedges planted to provide good shelter for nesting birds.

Biodiversity Offsetting: There are dangers that such a policy may threaten existing well established eco-systems because developers might use it to persuade planners that building on biodiverse areas can be effectively mitigated. It reflects a lack of understanding that ecosystem development is uniquely dependent on the land itself and cannot be simply 'offset'. This is especially noticeable where the 'biodiversity offsetting' is paid for in other countries! This leaves a dearth of native flora and fauna around the sites being promoted.

2. **Open Space provision:** CPRE endorses specific policies for community orchards which bring many benefits to neighbourhoods. Policies for community gardens should be considered as distinct from allotment activity. The policy on Bicester's Linear Park should be fulfilled. The policy on retaining buffer zones between villages surrounding major conurbations such as Bicester and Banbury needs reinforcing.

3. **Blue and Green Infrastructure:** The cumulative negative effects of development all over the District need to be counteracted by strengthening and extending the green and blue infrastructure. Projects such as Bicester's Blue Infrastructure Project should be funded and completed. Long-distance walking routes throughout the District should be protected and enhanced such as the Oxford Green Belt Walk, Oxford Canal Walk, the Jurassic Way and D'Arcy Dalton Way. There are also new routes such as the 'Seven Shires Way' and the 'Roman Way' published by Elaine Steane. The emerging Local Transport & Connectivity Plan 5 suggests a requirement for more access to long-distance and inter-urban walking and cycling routes across country.

4. **Conservation Target Areas:** This policy should be strengthened in light of increased pressure to develop in Cherwell. These areas should be protected as natural green space and their biodiversity increased. CTAs are so designated because their ecology has high value. Their ecosystems have evolved slowly and are specific to each site so cannot be transplanted elsewhere or mitigated for by saving a few hedges and trees. Claims by developers that the biodiversity of CTAs will be improved by partially building on them in order to release funds for biodiversity improvements make no sense and contravenes present policies that means this review is required to strengthen the policies to prevent further damage.

5. **Natural Accessible Green Space:** There should be more accessible natural green space as there are already shortfalls in the availability of this type of land. High quality natural green space should be included as part of all new housing developments, as well as the protection of designated open spaces and areas of significant flora and fauna.

6. **Local Nature Reserves:** CPRE believes more land should be designated as local nature reserves, if it is to meet the Natural England target of 1 hectare/1000 population. For example Bicester only has one LNR at Bure Park for a population in excess of 30,000, soon to increase to more than 60,000. Designating the available land east of Langford Brook

within Bicester 13 as a LNR would start to reduce this shortfall. Its biodiversity and presence of endangered species would merit designation especially as part of it is already a Local Wildlife Site.

7. Local Green Spaces (LGS): These are a provision in the NPPF. There are no designated LGS in Cherwell District. More publicity and guidance on submitting applications should be available. It is not reasonable to ask residents about these just in the 6 weeks of the consultation period. Cotswold District Council published a helpful toolkit <http://www.cotswold.gov.uk/media/880697/Local-Green-Space-toolkit.pdf> and something similar should be designed and publicised by CDC. CPRE Cherwell supports the Local Green Space applications that we understand are being made for Gavray Meadows and Langford Community Orchard.

8. Tranquillity – we welcome the reference to CPRE evidence in Para 2.42. We believe tranquillity, and policy objectives to protect it, should also be noted under the list of key issues.

9. Light pollution / Dark Skies – we welcome the reference to CPRE evidence in Para 2.43. In terms of how the Plan might address this issue, as well as tackling the negative of light pollution, it would be good to see the positive counterpart to this which is a proactive Dark Skies policy.

10. Visual impact – the importance of landscape and visual impact assessments should be referenced as part of guiding development appropriately.

Question 4: Banbury Planning Issues – Do you have any observations on the Banbury issues we have identified? Are there any others?

We agree wholeheartedly with (Para 2.62) 'Local residents value the attractive countryside surrounding the town.'

This should be picked up and addressed within the key issues, alongside reference to the importance of local historic areas such as Deddington, the Salt Way, Bloxham and up to the north of the ironstone villages.

Question 5: Bicester Planning Issues – Do you have any observations on the Bicester issues we have identified? Are there any others you would like to raise?

Key issues should include reference to the importance of the surrounding countryside and supporting / encouraging local people to access it, with associated benefits to health and well-being.

Town Centre Boundary: Preservation of Bicester's historic centre and Conservation area is of primary importance when considering expanding the town centre boundary. Recent new development of the town centre has not respected the scale and character of the existing buildings. For example, the loss of Wesley Lane has made the environment of the new Franklin House completely lacking in character. The setting of the old town centre should be protected. Views of the Grade 1 listed St Edburg's church from the Oxford Road must be protected.

Bicester's Green Infrastructure: The availability of natural green space in Bicester has decreased since it was assessed in 2011 (Open Spaces Study) due to new development in the intervening years and infilling of smaller green spaces. The increased population pressure has degraded the quality of existing green space by pollution and littering. Biodiversity has decreased because of overgrowth with aggressive perennials. Bicester Green Gym have evidence of the litter problem and neglect while working in Launton Fields Park, Duxbury Close, land adjacent to Bicester Community College, and Jarvis Lane. CPRE strongly support Council's policy on promoting and enhancing green infrastructure. Gavray Meadows LWS is a unique and important site for Bicester. A new Town Park at Pingle Field is much needed and the preservation of the sports pitches by the Oxford Road is important. The small green areas left, as part of the layouts of recent housing developments must be protected. .

Bicester Green Belt: A requirement for Bicester to have its own Green Belt should go along with the new Garden Town designation and provide green infrastructure. The Garden City principle includes this to prevent urban sprawl, provide amenity space, and give definition to the town. A Green Belt will link with the town's history as a market town with sheep and cattle being driven in by green lanes from the surrounding countryside and would also allow for the provision of the much needed accessible outdoor leisure space (see question 1) .

Question 6: Kidlington Planning Issues – Do you have any observations on the Kidlington issues we have identified? Are there any others you would like to raise?

We note Para 2.86: ‘We anticipate that any new countywide strategic matters and issues relating to the Oxford Green Belt will be addressed by all the Oxfordshire authorities working collaboratively through the preparation of the Oxfordshire Plan 2050.’

Given the recent large-scale alteration of the Green Belt boundaries, through the Cherwell Local Plan Part 1 Review, we would expect no further reduction in Green Belt land in the District to be proposed for the foreseeable future. Any such proposed changes would be strongly resisted.

Question 7: Heyford Park Planning Issues – Do you have any observations on the Heyford Park issues we have identified? Are there any others you would like to raise?

We accept that Heyford Park is a significant brownfield site. However, we would expect any future development to respect the policies of the existing Mid-Cherwell Neighbourhood Plan and be mindful of the site’s location in an otherwise very rural area, with limited road and transport options.

Question 8: Rural Area Planning Issues – Do you have any observations on the rural issues we have identified? Are there any others you would like to raise?

The Countryside

The Cherwell district remains a mainly rural area despite the Council’s frenzied development of areas around Banbury and Bicester and its violation of the Green Belt around Kidlington: it contains some of the most beautiful countryside in southern England. In spite of our disagreements over much of the new development, we are delighted that the proposed plan stresses the importance of protecting ‘valued landscapes’ and ‘areas of tranquillity’ as well as the need to identify areas ‘where development would be inappropriate’. We also welcome the suggestion that the Council ‘might protect those areas which are relatively undisturbed by noise and are valued for their recreational and amenity value’. The review

questionnaire gives examples of Otmoor and the Ironstone Downs, the latter an imprecise area which we recommend would stretch from Horley and Hornton in the north to the two Sibfords in the south via the villages of Shenington and Shutford. We agree that these landscapes should be protected, but the district contains many others of important scenic and environmental value such as the Cherwell Valley, especially between Somerton and Tackley, and the parishes to the west of the Northamptonshire border: Claydon, Cropredy and Wardington.

The Villages

We welcome the Council's desire to recognize and retain the local distinctiveness of our villages. We also appreciate its admission that some recent planning decisions have been controversial as well as its suggestion that house builders might be encouraged to 'do things differently in future'. Many recent developments have been ugly, inappropriate and in the wrong place: the Planning Inspectorate's recent decision to allow a new housing estate at Sibford Ferris - against the wishes of the Council and the villagers - is incomprehensible. Natural growth in villages can be accepted but huge developments create a strain on facilities and infrastructure, particularly inadequate roads. As at Sibford Ferris, too many houses are being built in relatively isolated villages with few employment opportunities and without access to main roads.

We urge the Council to close the loopholes that allow developers to get consent for house numbers far in excess of those envisaged in the current local plan. We also call on the Council to re-examine its village categorization and to reconsider its rural housing allocation.

This must include revision of the **Policy Villages 2: Distributing Growth across the Rural Areas**, to draw a distinction between housing granted permission (which lies within the local authority's power) and housing delivered (which is in the hands of developers).

Other issues

We note that the level of Gypsy and traveller accommodation will now fall to the Oxfordshire Plan 2050. We are concerned that, because of delays in the OP2050 process, the absence of direction may increase the risk of speculative development of this nature in villages even where the site falls outside of the criteria set out in Cherwell Local Plan Part 1. Can the Council offer any reassurance on this issue?

Whilst the need for more affordable housing is referenced at various points in the document, it is not addressed here as a specific rural issue. Research by CPRE suggests that the under-provision of genuinely affordable (social) housing is in fact worse in rural areas than urban areas. The impacts are also felt differently in rural areas, where for example just a few families or young people moving away can make a significant difference to the

viability of the community. We would encourage the Council to identify this as a key rural issue and consider policies accordingly.

There is a need for a specific rural transport policy - see our response to Q3.

Question 9: Key Themes – Do you agree with the Key Themes identified? Are there other Key Themes the Plan should address?

Addressing climate change should be first on this list.

Question 10: Maintaining and Developing a Sustainable Local Economy – Do you have any observations on the issues we have identified for this theme? Are there any others you would like to raise?

Overall, our concern is that the drift of the document appears to be top-down rather than bottom-up i.e. it is how Cherwell can deliver for the national economy, rather than putting the needs of existing residents at its heart. We appreciate that there is a balance to be struck but it feels too far one way and risks leaving us committed to growth targets before local people even get a say.

For example, if you look at the Sustainable Local Economy Key issues – these are chiefly about national policies, not for example identifying the least affluent parts of the District and thinking about how inequalities might be addressed. We ask the Council to re-balance this approach.

Question 11: Meeting the Challenge of climate change – Do you have any observations on the issues we have identified for this theme? Are there any others you would like to raise?

Cherwell District Council has declared a Climate Change Emergency. We welcome that. We call on the Council to place this issue as first of its Key Themes.

In the light of this, CPRE also believes that all the existing ESD policies in the current Local Plan should be reviewed and strengthened.

As emissions from buildings are a large component of carbon pollution, we suggest that resources are put into increasing the energy efficiency of new builds and into retrofitting housing stock. House insulation will save money in rural areas with a poor economy. Carbon audits should be performed for new developments to identify their climate change impact. Council can require higher standards than current national standards for new builds. Government has clarified that “Local Authorities are not restricted in their ability to require energy efficiency standards above Building Regulations” (ref UK Green Building Council and Core Cities, 2019, Sustainability Standards in New Houses).

ALL new developments must meet at least BREEAM “Excellent” standard. Gas for heating and cooking is to be phased out by 2040; new developments should not include the use of gas. The (retro) fitting of ground or air source heat pumps should be a normal practice. Battery storage should be a normal fit for developments to store and use electricity produced by the solar PV during the day for use at night.

We support Council’s decision to double tree cover in the District but planting should not be used to offset the carbon cost of new estates, but be an additional carbon reduction measure. In any case, the reduction of carbon emission needs far more than planting a modest number of trees. For example, the Council needs to think ahead and measure the future cost of building on green field sites which might better be used for food production as climate change intensifies.

Solar Farms need to be stopped at least until all employment buildings have solar PV installed. The scarce land is required to feed the ever-increasing population by providing locally sourced food to reduce food miles.

CPRE supports innovative projects such as Incredible Edible Bicester modelled on Todmorden (<https://www.incredible-edible-todmorden.co.uk/>) which aims to increase biodiversity as well as local food production by rejuvenating neglected spaces and small corners and a 'Garden Share Scheme' whereby garden owners who could not use their garden space shared it with a volunteer who wanted garden space, to the mutual benefit of both.

Question 12: Healthy Place-shaping – Do you have any observations on the issues we have identified for this theme? Are there any others you would like to raise?

Question 13: Establishing a Vision and Objectives – Do we need a new vision for the Cherwell Local Plan Review 2040? What should be its key priorities?

CPRE Oxfordshire’s guiding principles, and means of realising a vision for Cherwell District are that:

- The amount of development, and its timescale, should be based on natural growth and migration;
- Brownfield land should be developed first. Conservation Target Areas, Green Belt and Areas of Outstanding Natural Beauty should be developed as a last resort under proven exceptional circumstances;
- Genuinely affordable housing should be made available, in perpetuity, to address local need;
- High densities of development should become standard, to avoid losing more land than necessary;
- Any new communities must be sustainable and existing rural communities need investment to support services and infrastructure;
- Job creation should reflect Oxfordshire’s existing skill base while addressing areas of need to reduce unsustainable commuting.

Taken together, these actions would help the Council address both the climate and biodiversity emergencies.

See CPRE Oxfordshire's Better Vision for Oxfordshire:

<http://www.cpreoxon.org.uk/resources/documents/item/2797-a-better-vision-for-oxfordshire>

and our 3-minute film:

<https://www.youtube.com/watch?v=u5BcGBKUhuM>

Question 14: Call for Sites – Do you wish to propose any sites for the Cherwell Local Plan Review 2040? Please provide us with a location plan and details of your proposals. We have prepared a site submission form to help you.

CPRE Cherwell supports the Local Green Space applications that we understand are being submitted for Gavray Meadows and Langford Community Orchard.

Bicester Aerodrome area outside the perimeter track to be enhanced as the Local Wildlife Site it is presently registered as.

Question 15: Preparing the Plan – Do you have any comments specifically on the Sustainability Appraisal Scoping Report that accompanies this consultation paper?

Question 16: Methods of engagement – Are there any specific methods of engagement you would like us to consider in preparing the Local Plan and updating our Statement of Community Involvement (SCI)?

We are pleased that the Council wants to encourage more participation from the District's inhabitants in the formulation of the Local Plan. We believe that site visits with representatives from the council, ourselves and other interested parties would be a good way of finding some kind of consensus on matters of development and environmental protection. These should take place very early on in the process, and throughout, to ensure genuine, continuous engagement.

We also welcome the idea of digital engagement, the use of polls and surveys and other tools to find out what people want and care about. While the pandemic continues - and much of life remains virtual - the importance of such methods is obvious. It is, however, important to make sure that all areas of the community are included in any engagement going forward.

As we have said, we welcome many of the stated intentions in the review of the Local Plan. But too often in the past the Council has claimed to promote pro-environmental policies while doing the opposite - most notoriously in its huge and unjustifiable invasions of the Green Belt. Please make sure it doesn't happen again. Words in defence of the countryside are good in themselves. **But in a period so crucial for the future of the planet, action is what we need.**

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THANK YOU FOR TAKING THE TIME TO RESPOND TO THIS CONSULTATION. PLEASE RETURN THIS FORM BY 11.59PM ON 14 SEPTEMBER 2020 BY EMAIL TO: PlanningPolicyConsultation@cherwell-dc.gov.uk

ALTERNATIVELY, PLEASE SEND BY POST TO:

**Planning Policy Team
Planning Policy, Conservation and Design
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