

**CHERWELL DISTRICT COUNCIL
PLANNING POLICY CONSULTATION
22 SEPTEMBER 2023 TO 3 NOVEMBER 2023
Cherwell Local Plan Review 2040 – Regulation 18 Consultation Draft**

Representation Form

We are preparing a new Local Plan for Cherwell and would like your views. We are presenting a draft of the Plan for consultation so that you can consider our emerging proposals. It has been prepared to prompt discussion and feedback on new planning policies to guide the delivery of sustainable development across the district.

The draft Plan sets out a vision and proposes homes, employment land, infrastructure and other essential services required to support the local community over the Plan period.

The draft Cherwell Local Plan Review 2040 and supporting documents are available to view on-line at <https://cherwell.citizenspace.com/planning-policy/cherwell-local-plan-review-2040-consultation-draft>

This response form can be downloaded from <https://cherwell.citizenspace.com/planning-policy/cherwell-local-plan-review-2040-consultation-draft>

All documents are also available on Cherwell District Council's website at: <https://www.cherwell.gov.uk/local-plan-review-2040>

Hard copies of the documents are available to view, and hard copies of this form are available to take away at:

- Cherwell District Council offices at Bodicote house, Bodicote, Banbury
- Libraries across the District
- Woodstock Library
- West Oxfordshire District Council Offices at Welch Way, Witney
- Public exhibitions during the consultation period

How to use this form

Please complete **Part A** in full.

Then complete **Part B for each question you wish to comment on**. Boxes for comments can be expanded.

Please return completed forms:

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

Or by post to: Planning Policy Team, Planning Policy, 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.

Comments should be received no later than 11.59pm on Friday 3 November 2023.

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 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. 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.

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	Mrs	
First Name	Lynda	
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PART B – Please complete part B for each question you wish to comment on

Introduction

QUESTION 1: Do you have a view on the Plan period?

CPRE Cherwell has some concerns that the timescale of this plan, which takes us to 2040, is too long. Most plans that exceed 10 years are considered long term. There has to be sufficient flex in any plan to allow for clear changes in circumstances. CPRE Cherwell believes that there is uncertainty around the risks of acceleration of climate change for example. However, CPRE Cherwell recognises that a plan of this length provides certainty. CPRE Cherwell believes that the suggested plan period is fine as long as regular reviews are undertaken (say at 5 yearly intervals) to ensure that proposed development sites and policies are still relevant.

QUESTION 2: How could we improve presentation of the Plan?

CPRE Cherwell welcomed the four public exhibitions that were held within the county but thought that the time slots for some of the exhibitions disadvantaged working people. For example, the exhibitions at Woodstock and Bicester only ran until 6.30pm and 7.00pm respectively, therefore those at work would have found attending exhibitions nigh on impossible. Also, the Banbury exhibition was held quite close to the response closing date. Since there would have been potential consultees who would not have been able to make the presentations, the consultation exercise could have been improved by augmenting the exhibitions with a presentation of the key salient points of the plan which could have been made available on the website for the public to view at any time.

CPRE Cherwell notes that the recently closed West Oxfordshire Local Plan consultation held a Q&A session in person but also with zoom access and would ask Cherwell to consider such an event at the next stage of consultation.

CPRE Cherwell found the summary booklet handed out at exhibitions to be extremely useful but was not sure whether these were on the website and therefore downloadable. A questions and answers booklet would have been useful as well.

In relation to the Plan presentation itself, it would be useful if links were provided within the document to the supplementary documents and that there was a user friendly search function available.

QUESTION 3: Do you have any comments on our draft proposals for retaining/saving existing policies?

CPRE Cherwell found the publication of the Retained Policy List in Appendix 1 very useful. However, we believe that the Council could have gone much further in providing details of policy changes. Since working people with busy jobs would have only had a limited time to review the plan, they were particularly disadvantaged in either having to use up their limited time to produce their own policy changes document, or accept that they would not have this information to hand which would likely impact on their response to the plan.

Do you have any additional comments on the Introduction Chapter?

Vision and Objectives

QUESTION 4: Do you have any comments on the draft Vision?

CPRE Cherwell is generally supportive of the vision but have some comments on where we feel it can be improved further.

For bullet point one we would add; 'where the council have maximised the opportunities for exploiting brownfield sites and in particular rooftops for installation of solar panel technology'.

For bullet point 2 CPRE Cherwell believes that it is more than providing a choice of affordable homes to meet the needs of our local communities and that the vision of this plan should be to deliver enough affordable housing, including those available for social rent, that meets the need of our local communities.

Bullet point 4 appears to link the reduction of the need for our residents to travel to work outside of the district with economic growth. The vision should make it clear that the referred to economic growth is either local growth or national growth. CPRE Cherwell would argue that there is a need to reduce travel to work irrespective of whether there is growth or not.

QUESTION 5: Do you have any observations on our objectives?

CPRE Cherwell is generally supportive of the strategic objectives as outlined in the plan.

Do you have any additional comments on the Plan Vision and Objectives Chapter?

Spatial Strategy

QUESTION 6: Do you have any comments on our strategy?

There is a lack of positivity around the district strategic aims.
The district strategic aim of minimising carbon emissions and achieving net target net gains in biodiversity in new developments should be absolute requirements and without the

qualification of wherever possible. CPRE Cherwell has the same comment around the aim of wellbeing.

CPRE Cherwell would suggest that the 4th bullet point of strategic aims should replace encourage with ensure.

CPRE Cherwell has some concerns around the strategic aims as they are stated for Bicester. The term sustainable as a garden town is unlikely to have much resonance with local people. Whilst CPRE Cherwell recognises that some opportunities may be opened up by East West rail, growth cannot be open ended and must not be at the expense of environmental goals. CPRE Cherwell does not recognise key international destinations in relation to Bicester.

CPRE Cherwell does not believe that there is an overwhelming case for release of Green Belt land in Kidlington and that this development site should be removed from the plan. The case for altering the Green Belt boundaries for increased employment land is also not strong enough to prove exceptional circumstances and these changes should also be removed from the Plan.

District Wide Policies

QUESTION 7: Should we seek more than 10% biodiversity net gain if this means sacrificing other requirements?

CPRE Cherwell would support seeking a gain of more than 10% and think that the requirement should be that developers achieve a minimum 20% gain in biodiversity. This would be in line with recommendations from the Oxfordshire Local Nature Partnership and the Oxfordshire Environment Board. A recent report suggested that up to a sixth of native species face extinction; given these figures we believe that the pursuit of a 20% gain is entirely justifiable. The requirement for a 20% gain should be unconditional. The statement in the district spatial strategy for the achievement of setting net gains in biodiversity wherever possible is at odds with policy CP12; there can be no room for ambiguity here.

CPRE Cherwell questions why a biodiversity assessment tool will only need to be produced for what are termed major developments. Major needs to be defined in this context but a need for biodiversity net gain should be for all developments. Planning applications should be accompanied by a completed assessment tool that meets the minimum requirement. Only planning applications that meet this requirement should go forward; in principle approvals subject to receipt of the assessment tool showing the required gain should not be given. All planning applications should be accompanied by a biodiversity management and improvement plan otherwise they should not go forward. These need to be assessed by consultees to determine the realism of the developer's biodiversity net gain assessment. This also reflects the plan's wish, as articulated in para 3.57, that features of value are identified early in the planning process so that they can be adequately protected.

CPRE Cherwell welcomes specifying the metric tool to be used as this will help ensure that all developments are assessed on a consistent basis. CPRE Cherwell also welcomes the Plan seeking a net gain legacy in perpetuity (para 3.58). However, we are not sure that this is consistent with para 3.61 which requires gains to be secured for at least 30 years. The Plan mentions a number of features that can be built into developments to encourage biodiversity but does not mention hedgehog highways which should be incorporated into all new developments, along with swift bricks and bat boxes.

CPRE Cherwell is pleased that the plan recognises the linkages that a development may have with adjacent sites but often feel that these are ignored or not given due weight when planning applications are being determined. We agree that hedgerows often form part of a

nature corridor but are disappointed that there does not appear to be a specific mention of the national requirement to increase hedgerow by 40% as outlined by Defra.

CPRE Cherwell supports the plan's wish for planning applications to include all relevant surveys. We believe that the plan should make clear that surveys are undertaken at the appropriate time of the year when species are typically on site. CPRE Cherwell welcomes the plan's requirement that all planning developments should include a survey for the brown hairstreak butterfly. However, our experience is that many applications exclude this survey and this is rarely picked up by planning officers.

CPRE Cherwell welcomes the inclusion of the biodiversity mitigation hierarchy in this local plan, which if properly followed, should require developers to find biodiversity gains on site. Biodiversity net gains should only be off site when the pursuit of biodiversity gains on site have been exhausted. CPRE Cherwell believes that if the required gain cannot be achieved on site, then it should be as close to the site development as possible. CPRE Cherwell believes that the plan should state what is an acceptable distance between an alternative site and the development site for mitigation. CPRE Cherwell would not expect an alternative site to be outside of County for example. Whilst we welcome that an option for offsite biodiversity should be tagged to the Nature recovery Network, we believe there is some merit in trying to match habitat creation off site with what is being lost on the development site. This will help minimise the loss of certain species which is crucial in arresting nature decline.

The need to monitor, assess and regulate against set targets is paramount and CDC must ensure that it is resourced to be able to do this effectively.

QUESTION 8: Should we identify further land for employment?

CPRE Cherwell cannot see any justification for identifying further land. If more land is required then there are policies in place that will facilitate this. CPRE Cherwell has concerns regarding growth of warehouse based employments in Cherwell. To what extent does this square with the Bicester area strategy of helping develop technologies for environmental change. The types of employment attracted to Bicester must be the right ones that best fit Bicester spatial strategy with a workforce that possess the appropriate skills and abilities and that can afford to live in Bicester.

QUESTION 9: We would welcome information from local businesses and landowners that would like to expand or potentially relocate. It will help inform an Employment Land Review and the further consideration of employment land needs.

QUESTION 10: Do you have any comments on our approach of focusing employment development on strategic sites at Banbury, Bicester and Kidlington?

CPRE Cherwell supports focussing employment development on strategic sites in the major centres, other than where this would impact on the Oxford Green Belt at Kidlington. However, we do not think that the 40 hectare site identified as being south of Green Lane is a Bicester site and is situated in or on the edge of a village location and should be evaluated thus. This is contrary to CP25 and this site should be withdrawn.

QUESTION 11: What are your views on our proposed approach towards development at existing and allocated employment sites?

CPRE Cherwell would strongly support an approach in developing at existing and allocated employment sites, other than where this would impact on the Green Belt at Kidlington

QUESTION 12: What are your views on our proposed approach towards new employment development on unallocated sites?

CPRE Cherwell welcomes the strong emphasis of the plan which is to direct employment areas of growth to its main conurbations. CPRE Cherwell believes that this approach will best ensure that the local plan achieves both its strategic objectives and vision that fall out of the key themes that it has identified.

CPRE Cherwell does not believe that Core Policy 27, as currently drafted, is strong enough to conserve and enhance the countryside, landscape, the natural environment, and the setting of its towns and villages as per strategic objective 12.

The policy that CP27 is replacing, SLE1, stated that non allocated employment sites in rural sites would only be supported if it met a range of criteria. This has been replaced with where the benefits of the development outweighs its harmful impacts taking into account a range of factors. CPRE Cherwell is concerned that as these developments, by their very nature, will contribute towards economic growth and because planners often give this factor significant weight then developments on unallocated sites are more likely to be approved.

CPRE Cherwell is concerned that some of the very helpful criteria identified in SLE1 for determination of employment based planning applications have been removed.

- There is no mention in CP27 that the development must be outside of the Green Belt. There is no mention that the development should be built to a high standard using sustainable construction and that the development should be small scale.
- Under the new policy there is mention that the development should not generate excessive or inappropriate traffic which is often a concern for villages.
- Contributing to the general aim of reducing having to travel by private car has been replaced with measures to promote the use of sustainable transport.

QUESTION 13: What are your views on allowing ancillary uses on employment sites?

QUESTION 14: What are your views on our proposed approach to rural diversification?

CPRE Cherwell consider that some landowners are "holding onto land", and devaluing the productivity of this land in the hope that it can be sold for profit for housing development. It is important to address and seek solutions to this practice. This could best be achieved by

robust countryside protection policies which make it clear that speculative development on unallocated land will be firmly rejected. We appreciate that some of the influence over this lies with National Planning Policy, but the Cherwell LP must be as clear and decisive as possible on this issue

QUESTION 15: What are your views on our proposed approach to tourism development?

The plan should insist that wherever new houses are built they are for the use of those who buy them. We are informed that a number of those built in Barton are now being used for 'Air B&B' and this should be discouraged.
See National CPRE [research report on the impact of the increase in short-term lets](#).

QUESTION 16: What are your views on our proposed approach to retail development and town centres?

QUESTION 17: Do you agree with the town centre and primary shopping frontage boundaries shown on the plans?

QUESTION 18: Do you agree that only within the primary shopping frontage area E use classes should be protected?

QUESTION 19: Do you have comments on the Housing and Economic Needs Assessment?

CPRE Cherwell **strongly disagrees with the** Housing & Economic Needs Assessment (HENA) report issued by Oxford City Council in conjunction with Cherwell District Council. This was taken to a Part 2 Reg 18 consultation by the City earlier this year and was highly criticised by CPRE Oxfordshire, along with a wide range of other stakeholders, both non-statutory and statutory, including other Oxfordshire local authorities. We believe that CDC should have taken note of these responses and reviewed the HENA accordingly, but no action appears to have been taken.

In summary, CPRE Cherwell considers the HENA report not fit for purpose.

CPRE Cherwell considers the total housing numbers proposed in this report to be over-inflated. For example:

- The trajectory proposed for Oxfordshire as a whole envisages the population growing by nearly 27% by 2040, compared to Office for National Statistics estimates of a UK population increase of less than 5%.
- The level of growth proposed is over 50% more than the growth experienced in the previous period.

- The household growth is assumed to continue at the same rate from 2019-2029 to 2029-39 when the Office for National Statistics predicts a 41% fall in the second decade.
- The net migration is based on a 5 year rather than 10 year average, adding 20% to the figures.

This report forms the basis of the numbers proposed in the Cherwell draft Local Plan. It provides inadequate justification for not following the Government Standard Methodology to predict housing need, which already makes allowances for growth and the provision of affordable housing and is the maximum housing figure that should be considered.

Based on standard methodology, Cherwell's need would be 742 dwellings per annum (dpa) = 14,840 over 20 years. This is increased by the HENA to 1,009 dpa, plus 284 dpa for Oxford, giving total housing need of 1,293 dpa = 25,860 over 20 years. **This equates to 11,020 more homes.** (See Table 3, p114)

In addition, CPRE Cherwell would urge Cherwell DC to **resist accommodating Oxford's unmet housing need**, identified as 284 dpa for Cherwell. Cherwell should focus on the housing needs of the people of Cherwell and resist Oxford city overspill, which is both an overinflated number based on the unsound methodology of the HENA report and can be met by better land use, allocating brownfield sites within the city to homes instead of jobs.

QUESTION 20: Do you have comments on our emerging housing distribution?

CPRE Cherwell call for a comprehensive land use strategy which sets a positive long-term vision for land use across Cherwell. The strategy should inform decision making and incentivise greener land use decisions and deliver national environmental targets including net-zero.

Meanwhile, there should be a policy which addresses land use with suggested wording that "*urban regeneration and brownfield sites should be prioritised for housing needs. Developers should be required to use these sites before greenfield sites.*"

There should be a policy to "*retain a green buffer and a defined boundary between towns and villages*". We would draw your attention to Policy CS.13 in the Stratford on Avon Local Plan, "Areas of constraint" and would ask for something similar for Cherwell.

<https://www.stratford.gov.uk/doc/173518/name/SDC%20CORE%20STRATEGY%202011%202031%20July%202016.pdf>

There is also a need to prioritise the redevelopment of vacant/ empty houses within the district into homes.

QUESTION 21: Are there any Parish Councils seeking a specific housing requirement for Neighbourhood Plans?

QUESTION 22: What are your views on our settlement hierarchy proposals?

CPRE Cherwell is generally supportive of the settlement hierarchy proposals. We welcome the reclassification of villages from larger to smaller villages reflecting the degree of services and facilities that they can provide. This is to be welcomed. CPRE Cherwell welcomes that building beyond existing build limits will only be allowed on permitted sites.

QUESTION 23: What are your views on our suggested policy for affordable housing?

In Para 3.201 it is stated that “The Council’s Housing Strategy explains how housing for social rent is the only truly affordable housing option for many people in Cherwell.” We concur with this statement , but note that in 2020/21, just 7 social rented homes were delivered. Total delivery that year was 1,192 (table p119) i.e., only 0.6% of all the houses built met the real need. The draft plan states that it is proposed that 30% of new housing is affordable and 70% of this should be affordable/social rented but does not break down to give a social rent only figure. This needs to be clarified and more social rent homes must be provided within existing proposed numbers.

‘Affordable housing’ should be clearly defined and quantified within the plan , with new homes for sale or rent directly linked and affordable in relation to average local incomes for key workers.

QUESTION 24: Would you support maximising the delivery of affordable housing, and in particular the delivery of more social rented housing, if sacrifices were made in respect of other requirements?

CPRE Cherwell needs clarification on what is meant by “ sacrifices were made in respect of other requirements” as we do not consider this is necessary.

The pressing need for more social housing for rent should be the plan priority.

As we have highlighted in our response to question 23 we consider there to be a lack of clarity in the draft Plan in this area. The draft Plan states that it is proposed that 30% of new housing is affordable and 70% of this should be affordable/social rented but does not break down to give a social rent only figure. This needs to be clarified and more social rent homes must be provided within existing proposed numbers.

‘Affordable housing’ should be clearly defined and quantified within the plan , with new homes for sale or rent directly linked and affordable in relation to average local incomes for key workers.

QUESTION 25: Do you agree with our approach for assessing the suitability of sites for travelling communities?

Core Policy 42 states “*Sites for Gypsies and Travellers should be within 3km road distance of the built-up limits of our Main Towns, Local Service Centres or Larger Villages.*” We are concerned that this puts the site right out in the countryside, which we would be opposed to and would like to see additional wording which considers “*the scale, nature and appearance of the site on, and its relationship with, the settlement, its character and its landscape*”.

QUESTION 26: Would you like to propose any sites for consideration as Local Green Spaces?

CPRE Cherwell support the three Bicester Local Green spaces sites coming forward; Derwent Green, Gavray Drive and Langford. We supported the designation of two Local Green Spaces at Kidlington, Church Street Conservation Area and Bury Moor Fields. We are disappointed they have been rejected and seek clarification on the grounds for this decision.

We understand a number of sites proposed by communities around Banbury have also been rejected. For example, we support Banbury Lane, Nethercote.

CPRE Cherwell also intend to support an upcoming Local Green Space application for an extension to Gavray Meadows Local Wildlife Site/CTA which is over the A4421 to the east from the main area of the meadows.

Overall, it is very disappointing that, across the whole of the District, only three Local Green Spaces are proposed for designation. This suggests a serious failure in process and that much more needs to be done to raise awareness of this opportunity and to help communities understand what evidence is required to make a successful site nomination. [Recent research by National CPRE](#) suggests that deprived communities are particularly under-served.

CPRE Oxfordshire would be happy to work with Cherwell District Council to discuss possible collaboration on this issue, with the aim of future LGS applications being more successful.

Do you have any additional comments on Our Strategy for Development in Cherwell Chapter?

Our main comment is that we consider some of the language used too vague and open for exploitation. “**Where possible**”, “**if viable**”, “**maximise**”, “**consider**”, “**should**” must be taken out to give definitive assurances and boundaries to local communities and developers alike.

Generally, there are some good policies around climate change and zero carbon housing which CPRE Cherwell wholeheartedly support.

Core Policy 6 Renewable Energy does not adequately protect the countryside. This policy should clearly state that priority should be given to brownfield sites and rooftops for solar energy. We suggest additional wording for Core Policy 6 as below:

“a sequential ‘roof first’ approach for determining ground-mounted solar applications, which prioritises use of suitable brownfield land, avoids land used by

active, viable and sustainable farm businesses, and makes greenfield solar permissions more exceptional and time-limited.”

Section 3.5 targets a five times increase in solar energy generation. It must state in policy that this should and can be achieved with a brownfield site/ rooftop first approach. Speculative developer led solar farms on food producing land which forms a blight on the landscape must be stopped with watertight policy wording which prevents developer “wobble room”. To protect our countryside, it is vital that Core Policy 6 is strengthened to include this wording.

CPRE Cherwell supports the highlighting of Hedgerows within the plan but would like to see the Climate Change Committee’s recommendation of “a 40% increase in hedgerows by 2050 “ as a stated target. We consider this target would be best placed in Core Policy 43.

We support Core Policy 18 on Light pollution but would like to see this go further with a more proactive ‘Dark Skies’ policy. Such a policy would not only control new lighting but also take action to reduce existing light pollution and support the creation of identified Dark Sky areas.

We are greatly concerned about the Council’s ability to monitor and enforce the delivery of the plan at all levels. We highlight this article which mentions that some areas of Oxfordshire have real time monitoring of air pollution but Cherwell District Council only have average data once a year. This must improve if the aspirations of the Plan are to be currently assessed.

<https://banburyfm.com/news/new-air-quality-website-highlights-hennef-way-as-one-of-the-most-polluted-in-the-county/?fbclid=IwAR2aKQXAsz3FvrvF4fcnZ6aqJBs7zwOLIXd7zCd0bUIkoXk5-cNGPpvbRgQ>

Notwithstanding the policies within this Plan it is going to be critical that Cherwell District Council has the resources and manpower to monitor and enforce their delivery.

Banbury Area Strategy

QUESTION 27: What are your views on our aspirations for the Banbury area?

We believe that the volume of warehouse development will continue to grow unjustifiably unless policies in the Plan are strengthened.

There needs to be a recognition in the proposed plan that Banbury’s supply of warehousing has now reached saturation level – e.g., the finished units built as part of Banbury 15 have yet to find use two years on from their construction and the third one in construction at the site is likely to struggle for occupants.

Some of the core policies appear contrary to the ambitions for Banbury area. The Plan needs to go back strongly to the aspirations of the Banbury Vision document of 2016 which foresaw:

“maintaining a strong manufacturing sector; diversifying into higher skilled and knowledge based opportunities; support for skills acquisition; and, by driving the engineering economy through flagship sectors of motor sport and advanced engineering.”

There should be no weakening of planning policies. A good recent example of where any such lack of resolution on the part of the Plan could have serious adverse consequences is the totally speculative application for development for employment development at Huscote Farm, East of M40. This was made despite the land not being allocated in the Local Plan 2015 and in fact specifically rejected by the scrutinising inspector. The currently adopted Local Plan gave planning officers the opportunity to reject this inappropriate development on 15 planning grounds. It is unclear that the proposed new plan, with its significantly weakened policies would give planning officers sufficient authority to reject such frivolous applications so strongly.

There is lots of reference about green space and the importance of such, yet no new Local Green space designations are proposed for the Banbury area. The fact that all proposals have been rejected and the overall rejection rate for proposed LGS across the district suggests that a different approach is needed to seek proposals for this and that communities need further support in bringing forward appropriate proposals.

We would like to see a clear policy on protecting green buffer zones between settlements, with East of M40 J11 included in the Plan. The road infrastructure in Banbury is broken, a small incident on one side of Banbury causes traffic delays right across the town, we have a large supermarket that customers actively avoid using because motorists are regularly trapped in the car park for excessive amounts of time.

For Banbury to be a success these issues have to be resolved and **transport** networks in and around Banbury, **including public and active transport**, substantially improved.

The more development that happens, the less opportunity there is to resolve these issues. This is another reason that using an inflated method for calculating housing and employment land need is not logical.

If there is to be development at Site 4: Bridge Street/Concorde Avenue; the important Bridge? Street Community garden must be retained and incorporated in any such plans. We would like to see air quality monitoring East of M40

QUESTION 28: Do you think these sites in the Banbury area should be explored further for potential allocation for housing?

QUESTION 29: Are there any alternative housing sites for Banbury you wish to suggest?

QUESTION 30: Are there other areas of land that you think should be safeguarded for transport schemes at Banbury?

Do you have any additional comments on the Banbury Area Strategy chapter?

Bicester Area Strategy

QUESTION 31: What are your views on our aspirations for the Bicester area?

CPRE Cherwell has concerns as to whether the vision is wholly achievable. We are not convinced that the ambitious economic growth and housing targets can be achieved whilst at the same time meeting climate change targets. Currently housing and employment units have been developed which in themselves create traffic congestion. The Howes Lane relief road must be built to support the Northwest Eco town development and avoid major traffic congestion in this part of Bicester.

CPRE Cherwell is confused with the vision that Bicester will continue to be a thriving historic market town whilst stating in para 5.12 that there is the potential to transform Bicester from a traditional market town into a vibrant dynamic and market economy. Retaining Bicester as a market town appears to be more in line with the principles of a garden town than what is being suggested in the strategy. The traditional Bicester market town had a sports and recreational ground housing the town's football and rugby clubs with the town surrounded by agricultural fields. The former is set to be replaced by a car park and pocket size park and the latter by a combination of warehouses to the east and west of Bicester and predominantly housing to its North and South. The plan does not commit to 30 per cent of proposed housing being available for social rent which CPRE Cherwell believes is a garden town principle.

QUESTION 32: Do you think these sites in the Bicester area should be explored further for potential allocation for housing?

CPRE Cherwell does not support exploring the site identified South of Chesterton. CPRE Cherwell believes that it is incongruous to develop a site which is clearly contrary to some of the proposals being proposed in the Local Plan namely CP1, CP35 and CP43. It is not clear whether the proposed site falls within Chesterton or Little Chesterton but both are either smaller villages or classed as being in the open countryside.

A recent planning application was recently submitted on the same site and rejected. This was on the basis that the proposal was disproportionate when considered against the scale of the village and would be reliant on the motor car. This is contrary to new policy CP1 which states that developments should only be delivered on sites that reduce travel. Additionally, the planning application was refused on the grounds that it would cause significant adverse landscape impacts, contrary to CP43 which states that proposals would not be acceptable if they visually intrude into the open countryside and are inconsistent with local character.

CP35 requires that development is directed to larger settlements. Either Chesterton or Little Chesterton are at the lowest level of acceptability for development given the level of services that they are able to provide. There is nothing in the Local Plan's future strategy which suggests that this will change.

CPRE Cherwell supports para 5.6 in the Local Plan which proposes to look at potentially building sites nearer to the town centre and avoiding building into the open countryside.

This could be done in conjunction with raising the density of housing which CPRE Cherwell believes is set too low in the plan. Multi storey accommodation, which by its nature is higher density, is more appropriate in a town setting and is more likely to be affordable which will be key in recruiting potential workers to Bicester.

CPRE Cherwell would support sites as identified in Core Policy 74. Given the decline in retailing, climate change and the need to reduce car journeys to reduce carbon emissions CPRE Cherwell believes that the amount of car parking space should be reviewed against usage. The site adjacent to Bicester and Ploughley Sports Centre along Queens Avenue could be used more productively than at present. .

QUESTION 33: Are there any alternative housing sites for Bicester you wish to suggest?

QUESTION 34: Do you agree with the employment sites we have selected at Bicester to accommodate new employment development?

As above CPRE Cherwell would question whether this development at Chesterton should be badged as being selected as a Bicester development when it is likely to fall within a parish and therefore runs counter to the plan which directs employment to sites in Banbury and Bicester. We therefore support local plan policy CP25 and the approach of focussing developments at Banbury, Bicester and Kidlington (other than where this impacts the Oxford Green Belt). The proposed development will be twice the size of the Siemens site to which it would be adjacent. CPRE Cherwell is also concerned that given that the classification of allowable developments including class B8 and given its proximity to a motorway junction, there is a risk that this site could become another logistic warehouse. There is already an overprovision of warehouses in and around Bicester and apart from visibly scarring the countryside, this type of development appears to be at odds with what is being suggested in the strategy.

QUESTION 35: Are there any alternative sites to accommodate housing and employment needs that you think are more suitable?

QUESTION 36: Are there any other transport schemes that you think should be delivered at Bicester?

QUESTION 37: Are there any other areas of land that you think should be safeguarded for transport schemes at Bicester?

CPRE Cherwell welcomes the recognition of the need to develop an adequate road infrastructure both to serve the existing developments and further planned growth. CPRE Cherwell is concerned that further sites have been developed without the realignment of

Howes Lane having taken place. This is causing an unacceptable impact on local amenity and increasing traffic flows will inevitably be having an impact on noise and air pollution. CPRE Cherwell believes that developments of this magnitude should only be allowed when the local infrastructure is properly in place.

QUESTION 38: Is there other green and blue infrastructure you think should be delivered at Bicester?

The proposal for a Bicester Green Belt has been dismissed in one sentence in the Plan ; this is unacceptable and against NPPF policy. It needs to be revisited and assessed with due diligence.

Question 39: No question – Duplication in draft Local Plan

QUESTION 40: Are there any other measures we should be taking to improve Bicester town centre?

QUESTION 41: What are your views on our proposed approach to development proposals at Former RAF Bicester?

CPRE Cherwell has some queries relating to the proposed approach in relation to RAF Bicester. Since the whole of RAF Bicester is within a conservation area CPRE Cherwell believes that the development should be conservation led. Therefore, we would propose that the first para in CP75 should read; 'Proposals for the former RAF Bicester that help secure a long-lasting, economically viable future for the technical site and flying field should be conservation led.

Policy CP75 refers to the planning brief for the site which was agreed in conjunction with English Heritage and the brief clearly states that the brief is not supportive of any development on the flying field itself as this could harm the Conservation Area. Yet a recent planning application for the development of the site did just that and was still approved by Cherwell DC in spite of an objection being lodged by Historic England. Whilst CPRE Cherwell recognises that some flexibility might be required in the interests of securing longer term viability for the site, we would question whether another option would have still not achieved the same aim of securing the site's economic future. CPRE Cherwell would question whether the Council's approach in relation to this site has been conservation led.

This site is on a local wildlife site and is adjacent to the Stratton Audley SSSI and is home to rare calcareous grassland. CPRE Cherwell is concerned that given the presence of this rare habitat on site and the proposed vehicular related activities, this will seriously jeopardise the biodiversity of the site contrary to CP75 which is to protect and enhance biodiversity. CPRE Cherwell would suggest that given the number of piecemeal applications that have been submitted in relation this development, future applications in relation to this site should be required to submit biodiversity net gain assessments based on the latest approved DEFRA assessment tool so that that the Planning Authority is in a

proper position to assess the cumulative impacts of the development to date on the site's biodiversity.

Do you have any additional comments on the Bicester Area Strategy chapter?

Kidlington Area Strategy

QUESTION 42: What are your views on our aspirations for the Kidlington area?

CPRE Cherwell consider The Moors site in Kidlington, within the Oxford Green Belt, is in contradiction to the stated policy within this draft Local Plan and we are **strongly opposed** to this site as well as the additional changes to the Green Belt boundary to extend employment land.

We support policy 44 in relation to the Green Belt which states "Development *proposals within the Green Belt will be assessed in accordance with current government policy and other relevant Development Plan policies*". On this basis we challenge the site allocated North of The Moors as NPPF policy 140 where "*Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans*". **Full justification for this site being exceptional has not been provided.** In addition, NPPF, policy 141 states "*Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development*" No alternatives are considered within this draft report. A clear option which has not been assessed is the possibility of increasing housing density by a small degree at other sites to accommodate this housing need. Indeed, windfall numbers may in themselves cover the numbers at this site.

QUESTION 43: Do you think these sites in the Kidlington area should be explored further for potential allocation for housing?

QUESTION 44: Are there any alternative housing sites for the Kidlington area you wish to suggest?

QUESTION 45: Do you agree with the employment sites we have selected at Kidlington to accommodate new employment development?

There are further Green Belt boundary changes proposed with regards to employment land near Kidlington and again, as with the Moors site , justification and alternative scenarios have not been properly assessed within the plan, in accordance with NPPF policy 140 and 141.
CPRE Cherwell does not consider there to be “ Exceptional circumstances” for employment sites on the Oxford Green Belt.

QUESTION 46: Are there any alternative sites to accommodate housing and employment needs that you think are more suitable?

QUESTION 47: Should this Plan adjust Green Belt boundaries in the Langford Lane area in response to recently developed land?

QUESTION 48: Should land for employment use be identified at London Oxford Airport?

QUESTION 49: Do you have any comments on the transport schemes proposed for the Kidlington area?

QUESTION 50: Are there any other areas of land that you think should be safeguarded for transport schemes in the Kidlington area?

QUESTION 51: Do you have any comments on the green and blue infrastructure proposed for the Kidlington area?

QUESTION 52: Do you have any views on the proposed changes to the village centre?

QUESTION 53: Do you have any views on the areas of change identified?

QUESTION 54: Are there any other opportunity areas or sites that we should be including?

Do you have any additional comments on the Kidlington Area Strategy chapter?

Heyford Park Area Strategy

QUESTION 55: Do you have any views on our aspirations for Heyford Park?

CPRE Cherwell does not support exploring the site for further housing of 1,235 houses on a greenfield site. This is a big housing increase for Heyford proposed on a greenfield site with only a vague suggestion as to how people might be able to travel from there to anywhere. The road infrastructure is already gridlocked. CPRE Cherwell is concerned that given the nature of the site and its terrain whether a satisfactory highway network can be adequately created. CPRE Cherwell is also concerned that a development of this size would bring it closer to the settlements of Lower Heyford and Caulcott. This is contrary to Core Policy 45 which states that areas of open land between settlements are not developed where this would lead to coalescence. This is further iterated in Core Policy 43 (iv).

QUESTION 56: Do you agree with the local service role for Heyford Park proposed in Core Policy 3?

CPRE Cherwell assumes that the question is referring to Core Policy 35 not Core Policy 3. CPRE Cherwell does not support the inclusion of this policy as we believe it is premature. The policy actually states that 'further work will be needed before we can take a formal view on the proposal but it is unlikely we would be looking at delivering this further development before 2031'. Given the uncertainty around the timing and nature of work required on junction 10 of the M40 and the SRFI as well as the highway issues outlined in our answer to question 55 CPRE Cherwell cannot see any justification for inclusion of this policy.

QUESTION 57: Do you think we should be considering employment uses alongside the potential allocation for more homes in the longer term at Heyford Park?

CPRE Cherwell does not support the consideration of further greenfield land for employment uses. As with questions 55 and 56 CPRE Cherwell believes that the highway issues referred to above need to be resolved. If the local authority is minded to proceed with the proposed development CPRE Cherwell believes that it should be on a brownfield site and be of small scale in keeping with the local character.

QUESTION 58: Do you have any comments on the potential allocation at Heyford Park?

As per Question CPRE Cherwell does not support the allocation of 1,235 houses on a greenfield site at Heyford Park for the reasons stated.

QUESTION 59: Do you have any views on the principle of phased development at Heyford Park subject to implementation of the approved masterplan and the delivery of transport infrastructure?

See CPRE Cherwell response to Questions 55 and 58

QUESTION 60: Are there any other areas of land that you think should be safeguarded for transport schemes in the Heyford area?

Do you have any additional comments on the Heyford Park Area Strategy chapter?

Rural Areas Strategy

QUESTION 61: Do you have any views on our aspirations for our Rural Areas?

CPRE Cherwell is generally supportive of the rural area's vision and Core Policy 86 but does not support the release of Green Belt land as we do not consider the exceptional circumstances have been set out to justify this.

CPRE Cherwell strongly opposes the allocation of houses at land north of The Moors site in Kidlington. This site is in the Oxford Green Belt. NPPF and Local Plan policies do not allow development on the Green Belt unless there is an "exceptional circumstance", with a genuine need which cannot be met elsewhere. We note that further assessment is required to justify this site 2.189 as being exceptional. In CPRE Oxfordshire's view, national planning policy indicates that exceptional circumstances can only exist where the development is overwhelmingly in the public interest and could only achieve its purpose if it were located on Green Belt land. It is clear to us that this site does not fall within this category and these

houses could, for example, be easily accommodated on other identified sites if only very marginally higher housing densities were applied.

QUESTION 62: Do you support our preliminary proposals for housing in our rural areas?

CPRE Cherwell supports the proposal that the Local Plan should limit housing at the more sustainable sites in rural areas to 500 houses. CPRE Cherwell is concerned that some villages have had to bear a disproportionate amount of development much of which has been on unallocated sites. We therefore welcome CP 86 which states that development will only take place on sites that have been identified in the Local Plan or in a Neighbourhood Plan. CPRE Cherwell believes it is important that these sites have been identified. CPRE Cherwell is also keen that once these sites have been identified that consultees have had to chance to look at the sites and comment on their appropriateness before they are agreed.

QUESTION 63: Are there any potential rural housing sites you wish to suggest?

QUESTION 64: Do you know of any potential new rural employment sites?

Do you have any additional comments on the Rural Areas Area Strategy chapter?

Implementing the Plan

QUESTION 65: Do you have any comments on these measures?

Do you have any additional comments on the Implementing the Plan chapter?

Enforcement is a key issue but not mentioned here. We are concerned that lack of resource is severely undermining CDC's current ability to enforce planning decisions and conditions effectively. Any monitoring of the Plan should include clear indicators and targets with regards to enforcement.

Appendices

Do you have any comments on the appendices?

Supporting Documents

Do you have any comments on the supporting technical evidence?

Additional comments

Do you have any additional comments on the Draft Local Plan Review?