

**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>

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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	Alison	
Last Name	Smith	

Job Title (<i>where relevant</i>)	Chair	
Organisation (<i>where relevant</i>)	Somerton Parish Council	
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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?

The plan rightly looks to the future, however to what extent does the plan acknowledge how society is likely to change in this period e.g., the impact of artificial intelligence. How robust are the data sources underpinning the plan. For example, the dwelling forecast uses HENA data, not the government recommended standard methodology.

Does the plan have sufficient agility to respond to changes that might need to be made to for example climate change and sustainable development in response to new findings/ potential events. Up to now housing, health, education etc have worked in silo's how integrated is the thinking within this plan?

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

The plan is long, text rich and frankly not that inviting to read. How accessible is the plan and the consultation process to those who are unable to read and write? or whose first language is not English? or who have learning disabilities?

The use of pictures or summary bullet points may be helpful, more detailed maps would be helpful. The plan could benefit from more visual meaning. There are no photographic images of the areas that are likely to be developed.

We were unable to see current population levels and the likely impact on population, car usage and potential users of the train or bikes in the plan

It was unclear how the plan is shared with providers of transport – given we have had the 250 bus service cut and GWR are proposing to reduce the train service to Heyford. Both of those changes would work against the intentions of this plan to be more sustainable.

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

Do you have any additional comments on the Introduction Chapter?

The question /answer format is helpful.

Vision and Objectives

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

Overall, the vision covers the key issues.

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

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

We would like to see a real commitment to the protection of rural villages from urban sprawl

Spatial Strategy

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

Cherwell should not be expected to take the Oxford overspill of housing needs- until all the vacant dwellings and possible development opportunities in Oxford have been exploited. This area has well developed opportunities. Oxford City is prioritising brown field sites for employment instead of homes at the expense of the rest of Oxfordshire. This is not a sustainable plan; -If employment cannot be supported by local people, then the commute to oxford will mean more cars on the road and even more congestion on the roads into Oxford.

There needs to be sufficient affordable housing/ social rents so that people do not have to move out of familiar areas to afford properties if they would prefer to stay.

New builds should be built fit for the future and support climate change e.g., gas and oil boilers should not be installed, solar panels should be fitted as standard in new builds. Developers should be incentivised in some way so that the cost is not passed onto those buying the properties. Where possible energy developing sources should be installed on roads, pavements, signage etc.

Safe cycle paths should be created. Joined up walkways and bridle paths etc created and maintained.

Although flooding appears to have been addressed the building of new dwelling could create flood risks in new areas if drainage systems are not robust this needs to be considered and avoided.

District Wide Policies

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

Yes, a minimum of 20% with the implications made explicit. What are we sacrificing, needs more clarity.

A "brownfield/rooftop" first approach must be stated in relation to renewable energy. Solar power on Greenfields should be considered unsuitable. Protect Greenfields for food production, nature recovery, health and well-being and climate mitigation.

QUESTION 8: Should we identify further land for employment?

The proposed policy on employment land is significantly weaker than the existing Local Plan policy and should be revisited. Will this result in more warehouses that are not needed?

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?

Employment opportunities need to be created close to where the majority of people live, where preferable existing builds need to be considered for use rather than creating sites that are currently open countryside with no transport available other than cars.

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

The proposed approach appears reasonable.

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

There needs to be a compelling need for development on unallocated sites.

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

If this prevents building on unoccupied land it would seem reasonable and would hopefully make the best use of potential space.

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

The proposal for permitting rural diversification seems reasonable, however consideration needs to be given to the consequences of additional traffic to these areas and accessibility for those who may work in these areas where transport links are poor or non-existent.

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

Whilst tourist development brings opportunities it is not all welcome
Eg. 1 The Great Wolf Resort due to the impact of the immediate local area and the impact in other surrounding villages mainly due to traffic flow.
Eg.2 Traffic through Somerton relating to SOHO farmhouse and the lack of S106 funding to support calming measures; most London traffic comes through Ardley and Somerton village.

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

The proposed approach seems reasonable, retail development needs to be close to where people live to prevent the need for cars.

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?

Yes, there is also a need to avoid unnecessary light pollution.

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

**The HENA assessment appears to over inflate housing needs
The requirements for Oxford should be met within Oxford and not overspill into other areas.**

The Heyford and Bicester development are of a concern and could potentially result in the loss of demarcations with some villages e.g., Caulcott. Bucknell. Bicester's green belt needs to be reassessed to provide a larger area for non-coalescence to villages.

The Village of Bucknell will be lost to Bicester sprall which is not acceptable, if any development allowed here it should be reduced to offer more green space.

The proposed land south of Heyford Park towards Caulcott, this should be dropped in favour of brown field sites at Heyford Park.

A policy on allocation of s106 money involving affected Parish Councils would also be welcome.

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

We believe this is over exaggerated and needs revisiting It is not in line with the Government's agreed methodology, and that the figure of 25,860 homes needed in the period to 2040 should be significantly lower. We do not think that the figure proposed is compatible with the other aims of the LP, for example in relation to the natural environment, heritage, and maintaining rural character.

Any HP development should be on brownfield sites, less or none on green field sites but even then, any extra houses and employment at HP need to be carefully accessed given the current constraints of the road networks, especially to the west of HP and southeast via Middleton Stoney.

This plan seems to concentrate literally all the development on just four sites. Three sites are existing sizeable towns. Heyford is a rural area and has a distinctive landscape that this development would adversely impact on. It has been over-allocated in terms of its size and rural location.

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?

The plan to limit development in rural areas is welcome as is the re-categorisation of some villages. We welcome the category of "open Countryside" for Somerton and Fritwell as a smaller village but question the categorisation of Kirtlington as a larger village because it has no village shop and is already struggling with the commuting traffic volumes (and speeds). This is at odds with your Rural Areas Strategy; Kirtlington is not sustainable and has no sustainable travel choices for employment.

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

There is a concern that the suggested policy does not go far enough to deliver sufficient affordable housing. Affordable needs to truly mean affordable to those on low incomes. The MCNP Housing Need Assessment March 2023 (HNA) shows the housing need for our area is different to that stated for Cherwell as a whole.

"A. Proposals for residential development schemes of 10 or more dwellings will be required to deliver the following mix of dwelling types:

- 38 % as 1 or 2 bedroom homes
- 61% as 3 bedroom homes
- 1% as homes with 4 or more bedrooms

B. Proposals for residential development schemes of 10 or more dwellings will be required to deliver at least 35% (or 30% at Heyford Park) of affordable homes within the scheme and comprising the following mix:

- 60% social and affordable rent
- 40% affordable home ownership, comprising 25% as First Homes (at a minimum discount of 40%), 10% as shared ownership (at an equity share of 25%) and 5% as rent to buy"

There is also a need to ensure that people can remain in their own home for as long as possible and not be forced into residential or nursing home prematurely. There also needs to be sufficient provision to ensure those with learning disabilities and other needs are also able to live independently.

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?

Yes, but the sacrifices need to be explicit with a clear rationale.

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

Yes

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

3 sites at Bicester supported but we would like to see more sites recorded.

The low numbers of Local Green Spaces identified suggest that the system is not working well and that more support needs to be given to communities to help bring this forward.

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

Overall concern that greenfield sites identified for development over brownfield sites.

Banbury Area Strategy

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

There needs to be a support infrastructure that supports the aspirations. Traffic flow is likely to be a big issue, affordable public transport is imperative.

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

Housing development within the town centre is probably most beneficial. How much consideration has been given to development of brownfield sites?

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?

The aspirations are good, providing they accommodate local people's needs and do not encourage people to gravitate out of larger cities such as London due to cheaper costs of living etc.

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

Opportunities within the existing town centre should be exploited before exploring further sites. We do not support the Greenfield proposed area to the northwest in its current state. As previously stated, it should be reduced to protect the rural villages. And offer a larger green space to provide a buffer for the village of Bucknell.

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

To what extent have brownfield sites been considered?

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

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?

Transport schemes need to be affordable to everyone, reliable and available at times of the day/week when most people would use public transport as an alternative to their own transport. Affordable transport connections from rural villages to need to be considered. Eg a rural transport scheme to link to Heyford Station and Heyford Park bus services

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

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

The proposal for a Bicester green belt needs to be reviewed and assessed. Areas on non-coalescence need to be created to protect from sprawl of Bicester into surrounding villages.

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?

Promotion of disabled friendly areas.

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

We support the views on development here but the impact on local traffic on “open” days should be considered and planned for. We support the continued use of the airfield.

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?

Development in the Oxford Green Belt must be genuinely exceptional. The Moors site at Kidlington- in the Green Belt does not fall into this category. These homes can be located on other sites with higher density and better design.

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?

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?

The proposed removal of land from the Green Belt at Kidlington is unjustified and should be dropped from the Plan.

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

Only if there is a convincing need and a cost / benefit realisation undertaken to support the need/ benefits.

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?

Unclear why an amendment to the village boundary is required.

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?

Please remove, relocate or reduce planned allocation for 1,235 new dwellings. Until issues have been fully addressed

We support brownfield site developments over further greenfield sites (Caulcott) but not without much consideration and until impacts of the current masterplan development has been addressed to the satisfaction of surrounding Parish Councils

The most recent developments at Heyford Park have not delivered the kind of aspirations that this plan intends for sustainable communities e.g. clear connected bike routes, consistent application of environmental technology like solar panels or installation of ground source heat pumps. Local bus services have been cut and there are plans to reduce train services to Heyford...

The current local roads and infrastructure in and near to Heyford Park cannot support the intended volume of traffic. The medieval bridge over the river at Lower Heyford is single track and the bridge over the canal at Somerton is also single track. These roads simply could not accommodate the current plans for development.

The impact on nearby villages is of concern.

Google maps sends traffic to some of the northern business sites from all around the HP site via Somerton Village which is not acceptable, this needs addressing as a matter of urgency.

The infrastructure required to accommodate additional properties is just not there. There needs to be a Health centre at HP, it is not acceptable for HP residents to have to travel from HP for GP services. This is too many car journeys on rural roads.

It's a real concern that developers plan for the support that will be required but then it is not delivered. Health, education, recreation, transport facilities etc.

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

Cannot see ref to HP and "Local Service role" in core Policy3, - should say "Core Policy 35"

Yes, we would like to see services provided at Heyford Park such as Health Centre, sports facilities etc. to build a sustainable community, reducing the need for travel. But not before the current transport issues have been addressed.

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?

Not without further work and the evidence for the need and then it should be employment for local people to reduce the need for cars on the road.

The Plan should be focusing only on employment, not additional homes at Heyford Park (there are enough already).

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

Brownfield sites should be used over greenfield sites - but see notes above

Please remove, relocate or reduce planned allocation for 1,235 new dwellings.

Chapter 7 The Heyford Park strategy

7.19: we would like to see further opportunity identified: Improve pedestrian access around Somerton, the Heyfords, Ardley and the Astons, and protect pedestrians and other vulnerable road users from traffic. As concerns Somerton, as a minimum, make it safe for all villagers to walk to the the playground, village hall and planned allotments & community orchard. Currently it's not safe to be a pedestrian in many parts of Somerton. Given there are lots of young families now in the village this situation must be improved so that young people can walk around and play safely.

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?

We do not support the use of greenfield land for development, and we do not support 1250 houses on brown field at HP until all the current infrastructure issues have been resolved:

We have major concerns with regard to the access points to HP from the west; a single-track medieval bridge at Lower Heyford and single humpback bridge with weight limits at Somerton, with a lack of pavements in both these villages. These communities are already feeling the negative impact of HP development and any further expansion green or brown field should be carefully considered, with attention to s106 funds extended to the satisfaction of affected Parish Councils.

Would like to see a greater focus in the Plan on protecting pedestrians and other vulnerable road users from traffic in villages. - This is a major issue in Somerton particularly, and also the Astons, the Heyfords and Ardley.

The sensible access route to HP would be on the major road to the east but for some businesses on the north of HP traffic is directed - by Google maps- through Somerton (to a dead end) There seems to be no impetus from CDC, OCC or Dorchester to fix this issue.

There is no mention of s106 monies and how they are implemented in the LP, the approved masterplan has not been fully implemented but communities are already feeling the effects and surrounding villages are still trying to access s106 funds from 2011. (Now mainly due to the slow action of OCC)

The concern is the lack of an infrastructure and a lack of facilities e.g., health, recreation, transport facilities. Any phased development should be comprehensively reviewed prior to any further development being agreed.

Core policies 83 & 84 Supported but with a review on the number and location of houses. 83 should include a major improvement to the junction at Middleton Stoney to improve traffic flow – consider 2 small roundabouts instead of traffic lights.

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?

Rural sites and the benefits of rural spaces need to be protected as much as possible. The number of houses proposed in rural areas is of concern. Development in rural areas may be attractive to developers sadly there is nothing to show it provides affordable housing for those

wishing to live a rural life. And is not Sustainable in terms of transport to employment and services. (Eg Kirtlington; There is no sustainable transport to Oxford/Bicester/HP. Any development here will increase cars on the rural network.

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

It would feel more palatable for this to be supported if Cherwell was not required to take the Oxford overspill and a needs assessment review was undertaken in line with the government guidelines. As mentioned before the housing assessment is exaggerated. Rural areas may not need to take the number of houses proposed. This would help environmental issues.

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?

When areas are being developed; the impact of traffic is accessed, but the impact on the surrounding villages and rural roads / bridges, community and way of life, safety for residents is of concern and the quality of life/ has not been addressed in the strategy.

Implementing the Plan

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

The measures need to include local input / feedback.

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

Implementation and effectiveness should be communicated along with it being very explicit how this is being measured/ judged.

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?

Inevitably the plan is bound to be big and bulky however this also serves to turn people off and reluctant to getting involved. It would be helpful if a summary of key points was readily available to encourage wider engagement. It is unclear how younger people who are the future generation get their voice heard.

A six-week consultation period is not long enough, especially considering how long we have waited for this draft; and many Parish councils meet bimonthly.

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