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Planning Policy
Cherwell District Council

By email:
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**Corporate Director: Bill Cotton
Environment and Place**

3rd November 2023

Dear Planning Policy Team,

**Oxfordshire County Council's Response to the Cherwell Local Plan Review
2040 – Regulation 18 Consultation Draft (closing date 3rd November 2023)**

Oxfordshire County Council (OCC) continues to support the preparation of the Cherwell Local Plan Review and we welcome the opportunity to comment on the Regulation 18 Consultation Draft. OCC has provided comment on earlier stages of the plan preparation in September 2020 in response to the first Community Involvement Paper, and in November 2021 in response to the Options Paper. We are pleased to note that many of our comments have been incorporated.

This consultation draft Plan includes:

- A district spatial strategy and area strategies for Banbury, Bicester, Kidlington, Heyford Park and the Rural Areas;
- A housing need figure of 4,654 (including 1,280 for Oxford's Unmet Need);
- Draft potential development sites for housing and employment;
- Suggested policies
- A suggested delivery framework.

The plan's strategic objectives and draft core policies are structured into three core themes (below), which were identified in the Options Paper and we continue to support these themes.

Theme 1 – Meeting the Challenge of Climate Change and Ensuring Sustainable Development

Theme 2 – Maintaining and Developing a Sustainable Local Economy

Theme 3 – Building Healthy and Sustainable Communities

The draft plan is also supported by a number of evidence documents, including a joint Housing and Economic Needs Assessment (HENA) between Cherwell District and Oxford City Council.

A summary of OCC's key points is set out below. Please see Annex 1 for detailed officer comments.

Theme 1 – Meeting the Challenge of Climate Change and Ensuring Sustainable Development

Climate Action

We continue to strongly support climate action being central to the Local Plan and the ambition to be net-zero carbon by 2030 and we welcome the recognition given to the importance of mitigating and adapting to the impacts of climate change throughout the draft plan. The draft policies which relate to net zero development and energy systems and strongly aligned with OCC priorities as set out in our [Climate Action Framework](#) and the [Pathways to a Zero Carbon Oxfordshire](#) (PAZCO) report. We also strongly support the high-level themes which underpin the Local Plan and welcome the recognition of the role of the circular economy will play in delivering the strategic objectives of the vision.

We particularly welcome the recognition given to the importance of mitigating and adapting to the impacts of climate change throughout the document. As part of OCC's increased focus on the need for Oxfordshire to develop long-term resilience to extreme weather events and a changing climate we have been working with Oxfordshire stakeholders to develop a Climate Vulnerability Assessment, which looks to identify key climate vulnerabilities for Oxfordshire across a broad range of key thematic areas. The Climate Vulnerability Assessment will serve as an evidence base to identify priority adaptation and resilience actions that need to be implemented and will inform the development of an Oxfordshire Climate Adaptation and Resilience Strategy as well as a range of other policies and plans. The vulnerability assessment can support the Cherwell Local Plan by identifying key locations across the district that are particularly vulnerable to flooding and heatwaves, taking into account key variables such as locations of vulnerable population groups, access to greenspace and the urban heat island effect. We hope to publish the finalised report over the coming months.

OCC considers that the suite of policies that specifically relate to net zero development and energy systems represent examples of best practice and are very much aligned with the priorities of the County Council.

Sustainable energy production will accelerate the transition to net zero. This transition will involve shifting from fossil fuels to a decentralised local energy system, focussed on maximising clean and renewable electricity production (as highlighted through the [Project LEO](#)) within close proximity of homes and businesses.

Energy storage is also an important consideration and cost effective, long duration battery storage could reinforce the grid where there are local power inadequacies, which may otherwise influence the size or location of a particular development and contribute to load levelling of power to and from the grid which would reduce the commercial costs for residents.

The future decarbonisation and electrification of transport and heating places considerable demands on national and regional energy infrastructure, and at the same time local authorities are pushing to meet Net Zero targets. Local Area Energy Planning (LAEP) is a data-driven and whole energy system, evidence-based approach that sets out to identify the most effective route for the local area to contribute towards meeting the national net zero target, as well as meeting its local Net Zero target. All the local authorities in Oxfordshire are working together to produce Local Area Energy Plans (LAEPs) over the coming years. LAEPs identify potential actions and projects from a range of technologies and scenarios. This information is key to stakeholders being able to identify the most cost-effective preferred plan for how energy can be generated, distributed, stored, traded and used to enable a local area to reach its Net Zero target. It would therefore be helpful if the Plan made reference to future LAEPs.

Biodiversity

Local Nature Recovery Strategy

The Thames Valley Environmental Records Centre (TVERC) have recently completed a piece of work commissioned by all the Districts, City and OCC to produce the Interim Oxfordshire Nature Recovery Network 2023. It is intended that this mapping can help inform development of Local Plan policies across the County by identifying zones for nature recovery. References to the draft Nature Recovery Network (NRN) should therefore be updated accordingly.

The Interim NRN will however be succeeded by the Oxfordshire Local Nature Recovery Strategy (LNRS) once it has been published. LNRSs are a statutory requirement under the Environment Act 2021, they will be spatial strategies that establish priorities and map proposals for specific actions to drive nature's recovery and provide wider environmental benefits.

OCC are the responsible authority for production of the Oxfordshire LNRS and we are engaging widely with relevant groups across the County as a Supporting Authority, as we develop the strategy; it is anticipated that the LNRS will be published in 2025. In the interim, the [Oxfordshire Nature Recovery Network 2023 mapping](#) can help inform the development of Local Plan policies by identifying zones for nature recovery.

Core Policy 10: Protection of the Oxford Meadows SAC

Consideration should be given to seeking to improve water quality and the hydrological regime of the SAC, rather than just maintain its current state.

Core Policy 11: Protection and Enhancement of Biodiversity

Wording relating to irreplaceable habitats should be reviewed against NPPF 180 (c) which requires wholly exceptional reasons and a compensation strategy to be identified if these habitats are to be impacted.

Core Policy 12: Biodiversity Net Gain (BNG)

The policy text should be updated to reflect that the version of the Defra metric to support mandatory BNG will be metric 4.1.

We note that this policy seeks 20% BNG only within the Nature Recovery Network Core and Recovery zones and on new urban extensions. We encourage wider adoption of policy for >10% BNG; all Oxfordshire Local Planning Authorities signed up to the [OxCam Environment Principles](#), which agreed to a 20% BNG requirement. OCC have committed to deliver >10% BNG with an ambition to achieve 20% for our own planning applications ([Climate and Natural Environment Policy Statement](#)). The Oxfordshire Local Nature Partnership are compiling information to help support development of >10% BNG policy, as well a set of Oxfordshire BNG Principles which it could be useful to reference.

Landscape

Core Policy 14: Natural Capital and Ecosystem Services

The inclusion of this policy is welcomed. It is recommended that a definition of 'environmental net gain' and further detail on requirements are provided in the supporting text.

Core Policy 15: Green and Blue Infrastructure (GBI)

The policy on Green and Blue Infrastructure policy is supported, and the preparation of the Cherwell Green and Blue Infrastructure Strategy very much welcomed. We recommend that references to both the Natural England's Green Infrastructure Standards and the Cherwell's Green and Blue Infrastructure Strategy are made in the policy to guide green infrastructure in new developments. Consideration should also be given to whether the policy should require or encourage the use of Building with Nature benchmark for larger developments ([Building with Nature](#)) to assist with the creation of high-quality green and blue infrastructure in developments.

Tree planting should follow the principle of 'the right tree in the right place' and should also include the ongoing management of trees, so that they can fulfil their full potential. This requires developments to allow sufficient space for large tree planting in the right locations. Reference should be made to [OCC's Tree Policies](#) which include a requirement to achieve at least 30% canopy cover on strategic development sites and are aimed to help achieve the broader objectives of flood alleviation, climate adaptation, landscape resilience, carbon sequestration, noise and air pollution, wildlife corridors (both urban and rural), health and wellbeing, and traffic speed reduction.

The long-term management and monitoring of GBI is considered essential to ensure that long-term benefits are being achieved.

Historic Environment

Overall, the approach to archaeology and the historic environment is supported. We would welcome further discussion on improvements that could be made to the area and site specific sections of the plan. Please see Annex 1 for comments on the potential development sites.

Transport and Movement

Core Policy 21: Sustainable Transport and Connectivity Improvements

Whilst this policy is supported, we request that the wording is strengthened to fully embed the policies of the LTCP into the Local Plan (please see the Transport Development Management comments in Annex 1). Reference to OCC's [Parking Standards for New Developments](#) is supported. We suggest reference is also made to the adopted [Mobility Hub Strategy](#) and [Central Oxfordshire Travel Plan](#).

The Central Oxfordshire Travel Plan covers the city and surrounding area including Kidlington and Woodstock. The strategic transport schemes (Traffic Filters, Zero Emission Zone and Workplace Parking Levy) are expected to create a step change in Oxfordshire's travel behaviour. We expect more people choosing to access Oxford by sustainable modes of transport as a result. Controlled Parking Zones (CPZs) must be considered for sites close to Oxford, as well as around Woodstock in proximity to the proposed A44 mobility hub.

The decide and provide approach to managing travel demand by reducing the need to travel, planning for sustainable travel modes, and providing for zero emission vehicle use is strongly supported along with the transport hierarchy set out in the policy.

With regard to rail, as part of the LTCP Part 2, OCC is working on an emerging rail strategy 'OxRail 2040' which will cover rail development, new stations, de-carbonisation and climate resilience. This is expected to be adopted in Spring 2024.

Core Policy 22: Assessing Transport Impact/Decide and Provide

Contributions towards improvement of public transport should take into account frequency, as well as capacity, and development proposals may need to deliver off site walking and cycling improvements as direct mitigation, not just financial contributions.

Please see suggested amendments to the policy in the Transport Development Management comments in Annex 1.

Core Policy 23: Freight

We welcome the inclusion of a freight policy and goal of the policy which aligns with OCC's Freight and Logistics Strategy, which we suggest is referenced. We support the considerations for new freight facilities, but suggest new freight and logistic facilities should also consider opportunities to provide facilities for drivers, for example parking spaces. An absence of suitable driver facilities and parking spaces leads to HGV drivers seeking places to take required breaks elsewhere such as on the road network or in residential areas.

It is important to consider the importance of freight and logistics throughout the local plan to ensure an integrated approach. Consideration of freight should therefore also include how new homes, businesses and mixed used developments are served,

opportunities to reduce emissions from freight and how freight contributes to broader goals such as the accessibility and inclusivity of places.

Given the requirement for logistics and distribution proposals close to the Strategic Road Network (SRN), we would seek a requirement for the provision of safe access by active travel, particularly cycling.

There is a general issue around the loss of laybys for lorry parking to development sites in Oxfordshire which could be picked up here or separately. Developments which would result in the loss of a layby should be required to provide an alternative replacement unless it can be demonstrated the layby is not required for lorry parking.

Further suggestions:

'Vision Zero'

In relation to transport and safety, we would welcome reference to OCC's Vision Zero:

"Eliminate all fatalities and severe injuries on Oxfordshire's roads and streets, to have a safer, healthier, and more equitable mobility for all. Work closely with partners and stakeholders to take a whole system approach, working together on infrastructure, behaviour, technology and legislation to achieve this change".

OCC has set interim targets of a 25 per cent cut in casualties by 2026 and a 50 per cent reduction by 2030 before aiming to reach zero by 2050 (see Vision Zero report to Cabinet June 2022 [here](#) (agenda item 14)).

As part of the work on Vision Zero, OCC is seeking to promote the [Construction Logistics and Community Safety](#) (CLOCS) standard for construction traffic. We will be engaging with the district and City councils to establish a process for requiring Construction Logistics Plans (CLP) as part of planning consents.

Innovation

As part of the LTCP, OCC has produced an [Innovation Framework](#) which sets out how innovation can be integrated to new development and infrastructure. We suggest that the Innovation Framework is referenced in the draft Local Plan and we would seek for Innovation Plans to be prepared for new developments.

Theme 2 – Maintaining and Developing a Sustainable Local Economy

The draft Plan identifies 74.8 hectares of land for future employment development on the below strategic and retained Local Plan 2015 allocations. An allowance for an additional 15ha of land is made for non-strategic employment site allocations. We note that the Plan may need to identify further additional employment sites and we would seek to work with CDC to assess site suitability.

Table 1: Potential New and Saved Employment Sites

Site	Use Classes	Available Development Land (Hectares)
LPR56: Higham Way - Banbury	Mixed Use B2, B8 and E(g)	3.0
LPR55: Canalside - Banbury	Mixed Use B2, B8 and E(g)	7.5
LPR38: Land East of M40 J9 and South of Green Lane – Bicester	Mixed Use B2, B8 and E(g)	40.0
LPR21B: Land adjacent to Symmetry Park, North of A41 – Bicester	Mixed Use B2, B8 and E(g)	6.3
Bicester Business Park (Bicester 4)	Saved 2015 LP Allocation for B1 (a) and E(g)(i)	3.3
LPR63: Begbroke Science Park	Science Park - E(g) (ii)	14.7

Community Employment Plans

Core Policy 29: Community Employment Plans

We support this policy but suggest that use classes C1 and C2 (hotels and care homes) are included, as this would help support these sectors to develop a local skilled workforce.

We note this policy would apply to the proposed development sites LPR33: North-West Bicester and LPR42: South of Heyford Park as they met the 1,000 or more dwellings threshold however sites LPR21A: South-East of Wretchwick Green and LPR37A: South of Chesterton and North-West of A41 are within proximity of areas which are identified with high levels of educations, skills and training deprivation and recommend that CEPs policy are included for these sites.

Theme 3 – Building Healthy and Sustainable Communities

Housing Need

The draft Plan reports that Cherwell’s housing need figure (2020-2040) is 20,180 based on a joint Housing and Economic Needs Assessment (HENA) prepared with Oxford City. The Oxford’s Unmet Need figure apportioned to CDC is assumed to be 5,680. Combined this gives a total of 25,860. Existing supply is considered to be 21,206, leaving a remaining draft requirement of 4,654 for the plan period (1,280 of which would be for Oxford’s Unmet Need). A large proportion of the existing supply comes from allocations in the adopted 2015 Local Plan and the adopted Partial Review which are retained. We note Appendix 1 sets out a proposed list of retained and new policies.

OCC responded to the Oxford City Council consultation on the jointly commissioned HENA in March 2023; our comments on the HENA also apply to this consultation. We expect the matter of what is the housing need number will need further work following comments made on this consultation and the Oxford Local Plan Regulation 19 consultation, and the likely subsequent examination of the Oxford Local Plan.

OCC has an interest in the housing need as any new allocations are likely to have implications in respect of OCC’s statutory functions. The Local Plan will need to address the identification, provision, funding and overall deliverability of the infrastructure and County Council services needed to support sustainable development.

We welcome the recognition of the high need for affordable housing. OCC has an interest in respect of specialist need housing including affordable extra care housing.

Potential New Development Sites

To meet the suggested housing need for Cherwell there are a number of new strategic allocations proposed, one of which is in the green belt. These sites continue the spatial strategy of development at Bicester, Banbury, Upper Heyford and Kidlington.

Table 2: Potential New Development Sites/Supply

Site	No. of homes
Banbury	
LPR52: North of Wykham Lane	600
LPR49: Withycombe Farm (conditionally approved)	230
Bicester	
LPR21A: South-East of Wretchwick Green	800
LPR37A: South of Chesterton/North-West of A41	500
Kidlington	
LPR8A: Land North of the Moors (Green Belt)	300
LPR2: South-East of Woodstock	450
Heyford Park	
LPR42A: South of Heyford Park	1,235
Rural Areas	
Indicative Allocation	500
Total	4,615

It should be made clear which sites are for Oxford’s unmet need. Sites allocated to address Oxford’s unmet need should be well connected to Oxford.

Potential policies that would apply to these draft sites are provided in the area strategies sections of the Plan.

Comments on the potential sites are provided at the end of this summary and in Annex 1.

Affordable and Extra Care Housing

The County Council has an interest in affordable housing provision in respect of its social care functions. Core Policy 36: Affordable Housing proposes all sites of 10 or more dwellings provide at least 30% affordable housing and no differentiation is made between Cherwell and Oxford need sites. Further viability work should be undertaken to establish whether a higher percentage of affordable housing, in line with the Oxford City Plan and Partial Review, can be applied to some areas of the

District. We note that in West Oxfordshire, there are different areas having different affordable housing requirements, with high value areas requiring 50%. For sites close to Oxford (such as the two draft sites LPR8A: Land North of the Moors and LPR2: South-East of Woodstock) we would expect there to be a 50% affordable housing requirement. If not, this could undermine the position where 50% affordable housing is required on similar sites nearby (that being the requirement on the Partial Review sites, in Oxford City and on nearby sites in West Oxfordshire).

The County Council has commissioned its own research on the needs for specialist housing for older people, such as extra care housing, in order to update our current Market Position Statements on that. We welcome Core Policy 38: Specialist Housing but it should be strengthened and include a requirement for sites of more than 400 homes to provide extra care housing of at least 60 dwellings as part of the affordable housing component (for OCC, 60 homes is the minimum size to make an ECH development viable).

We also suggest changes are made to include provision for other forms of specialist supported housing, for example younger people with learning disabilities or ill mental health. This supports our strategic approach to adult social care, [the Oxfordshire Way](#), which seeks to enable residents to live independently within their communities.

We also suggest the inclusion of a policy to address key worker housing to support the recruitment and retention of social care professionals. Our draft [Adult Social Care Workforce Strategy](#) which was recently published clearly illustrates the higher than national average housing costs within Oxfordshire.

Please see the Affordable, Extra Care and Key Worker Housing comments at Annex 1 which suggest some amendments to the policy wording.

Core Policy 35: Settlement Hierarchy

There is no explanation of how the villages have been categorised. For example, the retail offer in some of the larger villages is very limited. Under 'Rural Areas' in the spatial strategy, 'larger and more sustainable villages' offer 'a wider range of services and are more well-connected to our urban areas'. As an example, Kirtlington would not fall into that category, due to the uncertain nature of future bus provision.

From an education perspective, it is difficult to be certain about the existence of spare capacity on the timescale required for the Local Plan; a generalised approach to identifying which small town and village schools could accommodate housing development is therefore difficult. The Local Plan should allow for flexibility such that proposals for housing development in villages can be assessed based on the latest available data.

Core Policy 46: Achieving Well Designed Places

The requirement to adopt the principles of 20 minute Neighbourhoods is supported, though we suggest the wording 'where appropriate' is deleted as this weakens the requirement.

Active Travel

CP47: Active Travel – Walking and Cycling

Every aspect of this policy on prioritising active travel is fully supported. In particular the requirement to contribute towards improvements and delivery of local and strategic active travel routes and links as identified in the Bicester, Banbury Kidlington and Heyford Park Area Strategies and associated IDP and [LCWIPs](#). We also welcome provision of cycle parking and active travel to be in line with OCC latest guidance.

Healthy Place Shaping

We welcome the recognition of the importance of health through the key theme of Building Healthy and Sustainable Communities, through the supporting strategic objectives (SO 10-14) and draft policies. However, we note that there are no policies which address stewardship, post-occupancy monitoring of health outcomes or supporting community development on strategic sites.

We also suggest that reference is made to national standards that support delivery of healthy urban design, including; [Building for a Healthy Life](#), Building Research Establishment Environment Assessment Method ([BREEAM](#)) and Lifetime Homes Standard for example.

We welcome reference to the Oxfordshire Joint Health and Wellbeing Strategy 2018-2023 but please note that a new draft is expected to be published in December 2023.

Education

Whilst OCC supports the aspiration that school facilities are available for community use, any policies would need to be carefully worded to ensure they are deliverable. Any school's primary function must be the education and safeguarding of their pupils, which will provide constraints on the type of facilities provided, and when they can be available for external use. Strict school safeguarding requirements mean that any community use has implications for school building and site design, and where these increase the costs of building new school accommodation, there may be viability constraints; there may also be limits to how far an existing school's accommodation can be adapted without excessive cost. Management of community use is an additional resourcing requirement for school management, and in particular small schools may not have the capacity to provide this. Finally, increasing numbers of schools are now academies, and any new schools would be expected to be academies, and these operate independently of council control, meaning that they cannot be required to deliver community use by the council. Dual use of new school facilities cannot therefore be required by the planning system at S106 stage because at the point of a new school being planned, the academy trust which will be the responsible body for the school is not yet known; and the County Council cannot enforce community use upon an academy.

Digital infrastructure

We welcome Core Policy 53: Public Services and Utilities, which seeks to provide a comprehensive coverage of electronic communications however, we would seek full-fibre broadband in line with the [Digital Infrastructure Strategy](#). We would also encourage provision to be future-proofed not only for 5G connectivity but later generations of mobile data connectivity.

Area Strategies

Banbury Area Strategy

We support the focus on previously developed land within the existing urban area as this compliments the transport policies which aim to prioritise those walking, wheeling, cycling or using public transport. A number of improvement schemes will be required to make the town centre accessible by active travel and bus and these could be delivered or contributed towards by these sites.

It will be important to develop the transport accessibility proposals as the site options are progressed. There is a clear opportunity to enhance the links between Banbury railway station and the town centre through the Canalside regeneration.

We support the aim to deliver schemes to reduce transport congestion, particularly along Hennef Way, as well as the need for new developments to deliver active travel routes, including to the villages.

OCC are working closely with Chiltern Railways on interim improvements at Banbury railway station to be delivered over the next three years, with a view to longer-term expansion and enhancement in the future.

Core Policy 64: Safeguarding of Land for Strategic Transport Schemes in the Banbury Area

'Enlarged M40 slip roads at Southam Road in Banbury' are specified in the draft plan. This should read 'new' slip roads as there are not any there at the moment. As part of the indicated 'road network improvements' along Hennef Way, OCC used Growth Deal funding to investigate the benefits and impacts of additional slip roads onto/from the M40 from Southam Road. OCC will consider whether these should form part of the area travel plan for Banbury and the modelling of the emerging sites within the Local Plan will provide the opportunity to consider their role within the Plan.

As OCC develops the area travel plan for Banbury it will consider the need and role of a link between Bankside and Chalker Way. The lack of active travel and bus access between the southern parts of the town and the north-eastern area where much of the employment is located will result in increased congestion on Hennef Way unless mitigation measures are put in place. This work will be carried out at the same time as the modelling of the emerging Local Plan Review and should feed into the IDP considerations. It is therefore OCC's current view that land will need to be safeguarded for this link.

We also request that land is safeguarded for ‘Land for improved walking / cycling facilities between Tramway Road and Banbury station.’ – see comments on Core Policy 65 below.

Development Policy 6: Banbury Inner Relief Road and Hennef Way

OCC supports this policy, although the design of the Cherwell Street corridor will be evolving to have a more place-based approach rather than purely a functional transport movement role. How people use that space, better connectivity between the railway station / Canalside area and the town centre, and opportunities to green the corridor will be key considerations. For the roads that make up the “inner relief road” and also Hennef Way, the area travel plan will assess the opportunities to provide for active travel and public transport both along these routes and across them, as part of the plans to reduce the congestion issues in the town. OCC is currently assessing a bus improvement scheme for Cherwell Street as part of the BSIP funding.

Core Policy 65: Development in the Vicinity of Banbury Railway Station

This policy is supported. There is a need improve the active travel connection between Tramway Road and Station Approach. The scheme due for delivery in 2024 will provide a 2m wide footway, but as the Canalside redevelopment is designed it should provide the opportunity to enhance this connection to a 3m width with a 1m verge. On Tramway Road the proposed shared use path approaching the roundabout should be widened to provide a segregated facility. We request that land is safeguarded for ‘Land for improved walking / cycling facilities between Tramway Road and Banbury station.’

Core Policy 66: Green and Blue Infrastructure in the Banbury Area

OCC support this policy and the need to improve the walking and cycling connections. There are a number of schemes mentioned here that OCC is looking to design up in transport terms, and this would provide the ideal opportunity for joint working to ensure greening is incorporated into the designs.

Core Policy 68: Banbury Canalside

The opportunities for active travel enhancements across this site should be a key element. We support the need for a high level of integration with the town centre. The opportunities for bus improvements and active travel along Cherwell Street or through the Canalside area should be explored.

Core Policy 69: Banbury Areas of Change

We support this policy and the focus on sustainable modes of transport. OCC’s Place Planning & Coordination team will want to feed into any considerations for these areas of the town to ensure the opportunities for improvements for active travel and bus journeys, and that the designs from a transport perspective have a place-based approach at their heart.

Bicester Area Strategy

Core Policy 70: Bicester Area Strategy

OCC support the strategy seeking to reduce the need for out-commuting. Economic development needs to deliver high quality active travel and public transport infrastructure to maximise the sustainability of these sites.

We support the strategy to redevelop Market Square which is key for the area travel plan. Provision of high quality walking, cycling and bus connections into the Market Square, and designing with a placemaking approach to thoroughly consider the needs and aspirations of local people will attract more people in the town centre and reduce the impact of these additional movements.

We support the need to deliver schemes that reduce transport congestion, which could include a south-east link road. Reducing congestion will happen by delivering growth that is designed to maximise trips by sustainable modes. Previous work has shown how a south-east link road could provide the opportunity for a transformational change to the rest of the network with a clear priority given to those walking, wheeling, cycling or travelling by bus.

The strategy to strengthen connections between the town centre and Bicester Village is supported. The opportunities to provide active travel connections will be set out in the area travel plan work and feed into the more detailed Plan proposals that emerge for Regulation 19.

We also support the policy to ensure new developments deliver improved active travel routes, including to surrounding villages.

Core Policy 71: Delivery of Strategy Transport Schemes within the Bicester Area

This policy is supported. The realignment of Howes Lane is an essential requirement for the North West Bicester development sites. The other three listed schemes (south-east link road, London Road improvements, and a bus priority route adjacent to the A41 on the Banbury Road) will be further considered through the area travel plan work and feed into the modelling work for the emerging development sites.

Core Policy 72: Safeguarding of Land for Strategic Transport Schemes in the Bicester Area

The safeguarding of land for a south-east link road, a bus priority route adjacent to the A41 on the Banbury Road, and the realignment of Howes Lane is supported. With regards to the south-east link road, the need and role of this new link road will be confirmed through the area travel plan work. The provision of a new link road (including bus and cycle measures) would need to be delivered alongside transformational change to the existing road network to significantly reduce car movements and improve accessibility by cycling, walking/wheeling and bus travel.

Core Policy 73: Delivery of Green and other Strategic Infrastructure in the Bicester Area

This policy is also supported. There are a number of opportunities here for partnership working to develop active travel schemes and other transport measures

alongside green improvements, in particular at Market Square and Bicester village station.

Core Policy 74: Bicester Areas of Change

OCC support this policy and the proposal to undertake comprehensive masterplans including traffic management and pedestrian environment, sustainable transport connectivity, and public realm improvements including de-cluttering. We will want to be closely involved in Market Square and London Road in particular because of the transport elements of those projects.

Rail

East-West rail services and Chiltern Railways' new rolling stock will provide improved connectivity and greater capacity at Bicester railway station.

Kidlington Area Strategy

Core Policy 76: Kidlington Area Strategy

The strategy to improve access to community facilities, sports and recreation spaces, and health care facilities should be supported by delivery of the measures identified within the Local Cycling & Walking Infrastructure Plan (LCWIP) and any local bus service or infrastructure improvements. Delivering all such measures within a placemaking objective will ensure that infrastructure meets the needs and aspirations of local people who will use these spaces.

Please to see the delivery of the LCWIP specifically mentioned, including connections to the surrounding villages.

Core Policy 78: Delivery of Strategic Transport Schemes within the Kidlington Area

Reference to the [Central Oxfordshire Travel Plan](#) and the shift to car-free travel at paragraph 6.60 is supported, but the August 2023 version of the COTP should be cited.

The schemes identified this policy will need to adhere to the COTP and the emerging A44 travel plan. The policy mentions the prioritisation of the A44 over the A4260, which is understood, but it will be important that there is a sense of place as the route runs through Begbroke and Yarnton rather than just designing this as a movement corridor. This will need to be worked through with the local community to understand the use of this space and ensure the right crossing opportunities are in place.

Core Policy 79: Safeguarding of Land for Strategic Transport Schemes in the Kidlington Area

The safeguarding of land for the following schemes is supported:

- Improved bus services and facilities along the A44/A4260
- A44 P&R/Transport Hub
- Proposed cycle and walking route network in Kidlington's Local Cycling and Walking Implementation plan (LCWIP)

The A44 P&R/Transport Hub should be referred to as the A44 P&R/Mobility Hub. OCC are now working this up to be a mobility hub rather than a Park & Ride so that

as well as bus and parking facilities there could be bike share, car club, micro-mobility, freight consolidation, other local services.

Core Policy 80: Kidlington Green and Blue Infrastructure

This policy is supported. All of these proposals will be important in encouraging an increase in people walking/wheeling or cycling.

Core Policy 81: Kidlington Areas of Change

We also support this policy and in particular the promotion of linkages to the village centre and improvements so sustainable transport. OCC will want to be part of the development of these areas from a transport and placemaking perspective.

Oxford United Football Club – Potential New Stadium at Kidlington

The consultation document is silent on OUFC's proposals for a new stadium on the Triangle site in Kidlington. OCC has an interest in this proposal both as landowner and regulator, particularly as the Highway Authority and the Lead Local Flood Authority, and would be interested should a draft policy for the site be prepared.

Heyford Park Area Strategy

Core Policy 82: Heyford Area Strategy

OCC support the requirement for further transport investment as this is a challenging location to deliver sustainable transport connectivity. The draft strategy aims to improve the local facilities and enhance local sustainability in transport terms which is supported.

Core Policy 83: Delivery of Strategic Transport Schemes within the Heyford Area

We support this policy and the transport infrastructure listed. It will be important to protect the local villages from the impact of further growth and to work with local communities to develop mitigation measures.

Core Policy 84: Safeguarding of Land for Strategic Transport Schemes in the Heyford Area

The safeguarding of land for the schemes listed in this policy is supported:

- A new spine road within the new proposed allocation to accommodate buses and to provide for active travel.
- A commuter cycle route to Bicester linking to an improved bridleway to Bicester to the east of Heyford Park.
- Capacity upgrades to M40 Junction 10 along with wider highway capacity improvements.
- Upgrading of the access road to the B430 to the east of Heyford Park.

Education

Additional housing growth in the Heyford Park area would need to incorporate the expansion of primary and secondary school capacity, we anticipate the need for a 2.22ha site for a new primary school and possibly additional sports provision for the secondary school.

Rural Areas Strategy

The draft strategy's increased emphasis on sustainable transport and active travel opportunities is supported. Sites should help to deliver local links identified within the various LCWIPs and the Strategic Active Travel Network.

CP51: Providing Supporting Infrastructure and Services

Core Policy 51: Providing Supporting Infrastructure and Services should include provision to recover monies where forward funding has been provided such as the wording currently in the Partial Review Policy PR11 Infrastructure Delivery:

'All sites are required to contribute to the delivery of Local Plan Infrastructure. Where forward funding for infrastructure has been provided, for example from the Oxfordshire Growth Board as part of the Oxfordshire Housing and Growth Deal, all sites are required to contribute to the recovery of these funds as appropriate.'

Core Policy 85: Ardley Railway Station

The principle of a reopening Ardley Railway Station for passenger services is supported. If including a plan for safeguarding land, this should be shown as indicative only, be located further to the south east where the old station was located, and include access.

Indicative Site Development Templates – Appendix 2

Transport

Key to all the proposed draft sites will be maximising accessibility for pedestrians and cyclists and ensuring excellent public transport connectivity.

There is a considerable amount of employment and housing growth proposed along the A41, both sides of Bicester. These sites will need to consider bus and cycle improvements along and across the corridor and contribute to measures that will be proposed through the A41 corridor study and the Bicester area travel plan, including the south-east link road.

At the Bolton Road site in Banbury town centre site there is an opportunity for very low levels of parking, including a large car free element, which may be necessary to mitigate the traffic impact. The location of LPR8A: North of the Moors, Kidlington, also offers the opportunity to provide a low level of car parking.

No access or spine roads are shown on the indicative plans and transport modelling is yet to be undertaken; these factors will inform an assessment of the acceptability of the sites and potential mitigation requirements. As such, OCC would welcome further discussion on the sites and reserve the right for further comments. Please see the detailed Transport Development Control comments in Annex 1.

Flood risk

A number of the proposed sites have areas of flood zones and areas at risk of surface water and groundwater flooding which has not been captured in the list of key constraints. The Strategic Flood Risk Assessment dated 2022 and published alongside the consultation with other supporting documents and suggests that Canalside (LPR55) has a high risk of fluvial and a moderate risk from surface water, and LPR56 (Higham Way) has a high risk of fluvial flooding. The SRFA also indicates that there are opportunities with sites LPR33 North-West Bicester, LPR37 South of Chesterton and North-West of A41 and LPR42a South of Heyford Park for natural flood management which are not captured in the Indicative Site Development Templates.

Landscape

Site allocations near Oxford and Bicester should consider potential impacts and opportunities on the 'Bernwood Forest and Ray Valley Living Landscape' project. This landscape-scale project led by the Berks Bucks Oxon Wildlife Trust (BBOWT) in partnership with others seeks to assist nature recovery in the area between Oxford, Bicester and Aylesbury. Some of the proposed allocations (eg LPR21A South East of Wretchwick Green- site A) are located in this area. It is strongly recommended that CDC consult BBOWT on the Local Plan proposals with a view that proposed site allocations can positively connect and contribute to this project.

Green Belt

The Plan proposes to remove the majority of site LPR8a Kidlington North of The Moors from the Green Belt. No exceptional circumstances are provided yet.

Education

The proposed allocation LPR2 South East of Woodstock/Upper Campsfield Road would increase population within the catchment area of Woodstock CE Primary school beyond the school's capacity, but not enough to make a new school viable. From an education perspective, this allocation would be dependent on additional capacity being provided at the planned new schools in adopted Local Plan Partial Review PR8 (Begbroke) site.

Minerals and Waste

OCC objects to the proposed sites LPR21A (South-East of Wretchwick Green) and LPR42A (South of Heyford Park). LPR21A is immediately adjacent to a safeguarded waste site under Policy W11 of the [Minerals and Waste Local Plan – Part 1 Core Strategy](#) (OMWCS). The proposed allocation would directly affect the waste management facility and if the allocation were to come forward potential mitigation measures should be included in site specific policies in accordance with Policy W11. This includes demonstrating that the equivalent waste management capacity can be appropriately provided elsewhere or it can be demonstrated that the site is no longer required for waste management.

LPR42A (South of Heyford Park) is in a crushed rock Minerals Safeguarding Area under Policy M8 of the OMWCS and the proposed allocation would prevent this mineral being worked in the future. If this proposal were to come forward, potential mitigation should be included in site specific policies to enable the mineral to be extracted prior to development.

Regarding proposed site LPR21B (Land adjacent to Symmetry Park, North of A41), we recommend that any policies that come forward for this site, specify specific use classes do not preclude waste facilities (sui generis). This would allow compatible waste sites to come forward on this land.

LPR55 (Canalside) and LPR56 (Higham Way) are both allocated for housing in the adopted Local Plan (Banbury 1 and Banbury 19 respectively) however the current consultation document proposes to replace these policies for employment use, with 500 homes retained at Canalside. Both LPR55 and LPR56 are within close proximity to safeguarded waste sites and recommend that site policies specify specific use classes do not preclude waste facilities (sui generis), which would allow compatible waste sites to come forward.

Archaeology

Please see Annex 1 for archaeology comments on the potential development sites.

Delivery

OCC would welcome further joint working to progress the draft Infrastructure Delivery Plan as the plan progresses.

Detailed Officer Comments

In addition to the points above, please see the detailed officer responses in Annex 1.

OCC Property and Estates Response

A response from OCC Property (Corporate Landlord) and Estates has been submitted under separate cover.

Next Steps

We note that according to CDC's Local Development Scheme, published September 2023, the timetable for the Local Plan Review is as follows:

- Consultation on Proposed Submission Plan (Regulation 19) - September-October 2024
- Submission (Regulation 22) – January 2025
- Examination (regulation 24) – January 2025 onwards, with hearings possible April-May 2025
- Adoption – December 2025 (subject to examination)

Yours sincerely

A handwritten signature in black ink, appearing to read 'R. Wileman', is centered on the page. The signature is written in a cursive style with a large initial 'R'.

Rachel Wileman
Director of Planning, Environment and Climate Change

Email: PlanningInOxfordshire@oxfordshire.gov.uk
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Enclosed

Annex 1 – Detailed officer comments

Annex 2 – Detailed Climate Action policy comments

Annex 3 – References and Additional OCC resources

**Annex 1:
Detailed Officer Comments on Cherwell Local Plan Review 2040 – Reg18
Consultation Draft**

Team	Comment
Strategic Planning	<p>20 minute neighbourhoods</p> <p>We welcome text about 20-minute neighbourhoods in paragraph 3.267 but this is followed by draft policy 46 which includes only:</p> <p>‘v. Adopt the principles of 20 Minute Neighbourhoods where appropriate’</p> <p>The inclusion of ‘where appropriate’ appears to dilute the intention. We refer Cherwell’s officers to the policies available within the County Council’s LTCP https://www.oxfordshire.gov.uk/residents/roads-and-transport/connecting-oxfordshire/ltcp</p> <p>Multi-functional streets</p> <p>We support the point x of Core Policy 46: Achieving Well Designed Places (below) but believe it should be improved by referring to local guidance available from the County Council as Highways Authority.</p> <p>‘x. Demonstrate a holistic approach to the design of the public realm to create high-quality and multi-functional streets and places that promotes pedestrian movement and integrates different modes of transport, parking and servicing. The principles set out in The Manual for Streets should be followed;’</p> <p>OCC published the Street Design Guide in 2021 and we expect this to be used by developers in designing future streets. This should be referred to in Local Plan policy, or at least in supporting text.</p> <p>New Secondary Schools</p> <p>Paragraph 3.293 refers to the safeguarding of a new secondary school at Banbury on the Longford Park development. For completeness, the paragraph should also mention that a new secondary school is required on the Begbroke Innovation Development i.e. on the site allocated under Local Plan Partial Review Policy PR8.</p> <p>The current Pupil Place Plan assumes that neither of these new secondary schools are expected to be built and open before 2030.</p> <p>Open Space, Sport and Recreation</p> <p>Paragraph 3.318 says: ‘The responsibility for the provision of open space, sport and recreation facilities in the district is shared between ourselves, Oxfordshire County Council, local town and parish councils, education providers, and private sports clubs and associations’.</p> <p>While OCC may own some land used for open space purposes, we do not think it is correct for the Local Plan to refer to open space, sport and recreation as a County Council responsibility as it is not something that we have a functional responsibility for commenting on when providing comments on planning applications.</p>

Development Briefs

Paragraph 6.4 refers to ‘prepared development briefs’ for the Partial Review allocated sites. However, we note that at the time of writing, there has been no public consultation on a development brief for one of the sites, PR8, and therefore there is currently no development brief for that site. We understand that Cherwell District Council is likely to commence public consultation shortly. Oxfordshire County Council will provide comments when it is available.

Oxford United Football Stadium Proposal

The consultation document makes no reference to the proposal for a new stadium on the Triangle site, Oxford Road and Frieze Way, Kidlington. Oxfordshire County Council resolved at its Cabinet meeting in September 2023 to lease the Triangle site to Oxford United Football Club, subject to a number of conditions. That decision was taken following previous reports to Cabinet and public consultation. The County Council has a dedicated webpage on this:

<https://www.oxfordshire.gov.uk/council/about-your-council/oxford-united-stadium>.

The proposal has since been the subject of an EIA scoping decision, ref 23/02276/SCOP, plans have been published and there has been a public exhibition <https://www.oufc.co.uk/news/2023/october/new-stadium-details/>.

We note that there is Question 54 applying to the Kidlington area asking: ‘Are there any other opportunity areas or sites that we should be including?’ The County Council has two separate interests as landowner and as regulator, particularly as the Highway Authority and the Lead Local Flood Authority. We would be interested should a draft policy be proposed for this site.

Housing Numbers and Provision for Specialist Housing

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

Oxfordshire County Council has comments on the Housing and Economic Needs Assessment (HENA) jointly commissioned by Oxford City Council and Cherwell District Council in 2022. Oxford City Council has already undertaken a consultation on this which we responded to in March 2023 with our comments. Those comments were shared with Cherwell District Council policy officers at the time, are available online [Council responses to consultations about planning | Oxfordshire County Council](#) and can be considered part of the response to this consultation.

The County Council’s comments about the HENA, as stated in our March 2023 response are in summary:

- We question the exceptional circumstances that justify a figure higher than the government’s Standard Method for the total need over the housing market area.
- We question distributing Oxfordshire’s housing need by district based on employment in 2040 (i.e. the housing growth figure being based on which district the jobs are expected to be in), which leads to Oxford City Council having a high share of the need. The proposed choice has Oxford at 30% of the housing need

across Oxfordshire; Cherwell 22.9%, South Oxfordshire 18%, Vale of White Horse 16.2% and West Oxfordshire 12.8%.

- We recognise the high need for affordable housing. The County Council has a particular interest given its social care role. We want to see provision being made for affordable forms of housing catering for those who are older or who have specialist needs, particularly extra care housing.

Paragraph 3.173 of the Cherwell consultation document refer to calculations as follows.

Projected Housing Need in Cherwell Document

Cherwell's housing need	1,009 per annum
Oxford's housing need	1,322 per annum
Oxford's current housing capacity	457 per annum
Oxford's current unmet need	865 per annum
Indicative % of unmet need to Cherwell	32.8%
Unmet need potentially distributed to Cherwell	284 per annum
Housing need to be met in Cherwell	1,293 per annum
Housing need to be met in Cherwell 2020-2040	25,860

Oxford City Council has recently announced its level of housing capacity in a press release on 28 September 2023. The assessed total capacity stands at 9,612 homes over the plan period 2020-2040 equating to 481 homes a year. Therefore, a first change to the table above is to change the figure 457 to 481, which leads to a reduction in the level of unmet need and the total. If this were to be the only change the figures would be as follows:

Projected Housing Need in Cherwell Document amended for latest unmet figure

Cherwell's housing need	1,009 per annum
Oxford's housing need	1,322 per annum
Oxford's current housing capacity	481 per annum
Oxford's current unmet need	841 per annum
Indicative % of unmet need to Cherwell	32.8%
Unmet need potentially distributed to Cherwell	276 per annum
Housing need to be met in Cherwell	1,285 per annum
Housing need to be met in Cherwell 2020-2040	25,700

It is important to note that provision is already made in Cherwell for 4,400 houses on six sites, allocated in the Cherwell Partial Review as PR6a, PR6b, PR7a, PR7b, PR8 and PR9. No houses on any of those sites have yet been built. 4,400 over 20 years between 2020 and 2040 equates to 220 per year. Therefore, of the 276 figure in the table above, the additional figure is 56 per year, or a total over the 20 years of 1,120.

We are seeing some applications on the Partial Review allocated sites for housing numbers in excess of the allocated housing numbers. The running total in the table below indicates an additional total on those sites of 298 houses. If this figure is subtracted from 1,120, the remaining unmet need figure would be 822 or 41 per year. It is recognised however that not all the Partial Review sites have come forward yet.

Allocated Sites for Oxford's Unmet Need in Cherwell District

PR6a East of Oxford Rd	690	Outline application for up to 800
PR6b West of Oxford Rd	670	No application yet, so 670 figure used
PR7a South East of Kidlington	430	Application for 370, approved subject to S106. Application for 96. Total of 466.
PR7b At Stratfield Farm	120	Two applications for 118 + 4 = 122, approved subject to S106.
PR8 East of A44	1,950	One application for approximately 1,800. EIA scoping on another part for 300. May be more on smaller parts but proposals are for at least 2,100.
PR9 West of Yarnton	540	Outline application for 540 + a care home.

Total currently envisaged by developers: 4,698

The County's key interest in the issue of housing numbers is in understanding that the need for more housing and other uses is well evidenced because any new allocations are likely to have transport, education and other implications of particular interest in relation to our statutory functions. The County Council can also act to support the districts and city in highlighting issues where there are differences in approach and offering a way forward for example in relation to infrastructure needs.

If Oxford City Council's Local Plan covering the period 2020-2040 is adopted prior to the other Local Plans in Oxfordshire, then it will establish not only its own level of need but a level of unmet need. This is because Oxford City Council's capacity 2020-2040 is currently assessed through the HELAA as less than the level of need under any scenario.

Local Plans are 'sound' if they are, inter alia, positively prepared which means (para 35, NPPF) 'providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development'. Given paragraph 35 of the NPPF it may not be necessary for any particular quantum of unmet need to be addressed in each district if it is not practical to do so.

Sites in the Kidlington Area

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

And

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

Cherwell's consultation document (Table 7 at paragraph 3.187) indicates that the District Council is considering allocating these in its forthcoming Local Plan, along with provision for additional allocations in the rural area amounting to a further 500 houses.

Proposed Draft Allocations

Potential Sites	Number of dwellings
<i>Banbury</i>	
North of Wykham Lane	600
Withcombe Farm (conditionally approved)	230
<i>Bicester</i>	
South-East of Wretchwick Green	800
South of Chesterton/North-west of A41	500
<i>Kidlington</i>	
North of the Moors (Green Belt)	300
South-East of Woodstock	450
<i>Heyford Park</i>	
South of Heyford Park	1,235

These comments below focus on the two Kidlington area proposals.

Some details on the site North of The Moors can be found on Cherwell District Council's website dating from 2017:

<https://www.cherwell.gov.uk/downloads/file/1965/pr-b-0847-bloombridge-llp---land-at-the-moors-kidlington>. An updated HELAA for Cherwell District Council would include more up to date information, as the developers are promoting this site. Pages 260 to 262 of this consultation document provide some details of the 21.5ha site as part of Appendix 2.

There are more details available for the South-East of Woodstock site as it was previously proposed by Cherwell District Council in the Local Plan Partial Review. The site was removed from the plan by modification at examination, following advice from the independent Inspector in August 2020. The Inspector raised a number of concerns, including the setting of the Blenheim Palace World Heritage Site and its relationship with neighbouring development within West Oxfordshire District. A planning application (22/01715/OUT) was lodged in June 2022 and withdrawn in July 2023. Pages 263 to 265 of this consultation document provide some details of the 48.7ha site as part of Appendix 2.

The site North of The Moors is in the Green Belt, and in accordance with the NPPF paragraph 140, there has to be exceptional circumstances fully evidenced and justified to remove the Green Belt designation and allocate the land for development. As recognised in the consultation document, it has not yet been determined if there are exceptional circumstances.

Affordable Housing

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

Paragraphs 3.196 to 3.204 of the consultation document explain the high need for affordable housing and indicate the proposal for 30% affordable housing on qualifying sites is suggested on viability grounds even though it will not meet all the assessed need.

Paragraph 3.205 sets out the situation with Oxford's unmet need. The Local Plan Partial Review requires 50% affordable housing on those allocated sites and it is understood that this forthcoming Local Plan would carry over those provisions. We support that and note that it will need to be very clear in the forthcoming Local Plan so that developers of the Partial Review sites do not seek to take advantage of policies about 30% affordable housing elsewhere.

In addition, paragraph 3.205 says that it is proposed that at least 50% of any additional unmet housing need for Oxford provided within the plan would be affordable homes. It is not yet clear how this will be achieved.

We would be concerned if more sites (such as the two Kidlington sites suggested in the consultation document) were allocated in close proximity to the Partial Review sites with a requirement only for 30% affordable housing, as that could undermine the position where 50% affordable housing is required on similar sites nearby (that being the requirement on the Partial Review sites, in Oxford City and on nearby sites in West Oxfordshire). We think that such sites are likely to be viable with a 50% affordable housing requirement and therefore should seek 50% affordable housing.

The County Council would appreciate clarity on the process of housing nominations that has been agreed between Cherwell District and the City in respect of affordable housing on sites which are identified for Oxford's unmet need. While that process is slightly removed from the formulation of Local Plan policy, it is important that housing officers are clearly directed by the Local Plan as to what should be agreed.

Proposals about Housing Mix and Specialist Housing

The consultation document contains important information and draft policies about housing mix and specialist housing between paragraphs 3.206 and 3.232.

The County Council has a function in relation to adult social services as described on our County Council [website](#). In respect of housing, our [website](#) advises that in most cases the responsibilities are with the local council but the County Council might help residents with:

- [Housing support for care leavers](#)
- [Services for young people and people with learning disabilities and autism, mental health conditions and complex needs](#) (there is a link on this page to the Market Position Statement 2019-2022)
- [Extra care housing](#) (there is a link on this page to the Extra Care Housing Supplement 2019-2022)
- [Finding a care home](#)

The County Council has an interest in affordable housing provision in respect of its social care functions, as well as more general objectives and policies. The County Council has commissioned its own research on the needs for specialist housing for older people, such as extra care housing, in order to update our current Market Position Statements on that. Some affordable housing on sites might be for specialist housing.

We support the recognition of the need for extra care housing in paragraphs 3.212 and 3.213. We were disappointed recently to find that extra care housing was not expected on the Partial Review sites as it was not specifically addressed in the preparation of that review, and therefore the policy in the current Local Plan, Policy

	<p>BSC 4, requiring a minimum of 45 self-contained extra care dwellings on sites involving more than 400 houses, did not apply.</p> <p>The draft policy 38 is not as strongly worded as Policy BSC 4 in that it is drafted to say ‘the proportion of extra care housing units is to be agreed with the Council based on the nature of the site and proposals in question’. We think this text should be refined so that developers have strict requirements which they need to meet in order to be a policy-compliant development. We think that large sites, involving more than 400 homes, should be required to provide an affordable extra care housing development of at least 60 dwellings as part of the affordable housing component.</p> <p>We support the statements in paragraphs 3.215 to 3.218 about the need for accessible and adaptable housing, however these do not seem to be followed by any draft policy being proposed. The draft policy 39 should include requirements for some new housing to be built to address the needs of some older and disabled people and address the locational needs of these near to shops, community facilities and frequent public transport services.</p> <p>Strategic Planning comments on key document sources</p> <p>We support the reference throughout the document to various key documents which cover the county or wider areas such as:</p> <ul style="list-style-type: none"> • Healthy Place Shaping Oxfordshire (2021), Oxfordshire Health Impact Assessment Toolkit • HM Government and Oxfordshire LEP (2019), Oxfordshire Energy Strategy • HM Government and OxLEP (2020), Oxfordshire’s Local Industrial Strategy: Investment Plan • Network Rail (2021), Oxfordshire Rail Corridor Study • Oxfordshire County Council (2014), Oxfordshire Right of Way Management Plan (2015-2025) • Oxfordshire County Council (2021), Electric Vehicle Infrastructure Strategy • Oxfordshire County Council (2021), Kidlington Local Cycling and Walking Infrastructure Plan • Oxfordshire County Council (2022), Decide and Provide: Requirements for Transport Assessments • Oxfordshire County Council (2022), Oxfordshire Local Transport and Connectivity Plan 2022-2050 • Oxfordshire County Council (2023), Access to Banbury Train Station (Tramway Road Improvements) • Oxfordshire LEP (undated), Strategic Economic Plan <p>We also recommend that appropriate reference is made to relevant OCC guidance, see Annex 3 for a suggested list.</p>
<p>Oxfordshire Transport Strategy</p>	<p>Core Policy 21: Sustainable Transport and Connectivity Improvements</p> <ul style="list-style-type: none"> • 3.100 - Introduction to the policy largely focuses on the negative impacts of traffic congestion due to private car use. It would also be helpful to include other negative impacts of private car use such as impacts on air quality, health, road safety and physical inactivity. • 3.100 – Need to clarify what emissions are being referred to e.g. total greenhouse gas emissions or carbon dioxide emissions. • 3.100 – Question the source of the total emission figure and the 20% figure quoted. The LTCP utilises data from the Department for Energy Security and

Net Zero (UK local authority and regional greenhouse gas emissions national statistics) that identifies approximately 36% of total greenhouse gas emissions and 41% of carbon dioxide emissions are from transport in Oxfordshire.

- 3.103 – Welcome reference to the LTCP. The section could also reference the adopted Mobility Hub Strategy and Central Oxfordshire Travel Plan.
- 3.107 – Welcome references to 20-minute neighbourhoods and healthy streets approach. However, these are not included within the policy text and would benefit from inclusion to reflect the importance of place shaping alongside infrastructure delivery.
- Core policy 21 – Overall support the policy and particularly welcome references to ‘decide and provide’ and the transport user hierarchy.
- Core policy 21 – The use of ‘should’ and ‘expected’ within the policy imply that certain aspects of the policy are not required. Therefore, it is suggested that the wording of the policy should be made clearer and stronger to reduce ambiguity e.g., using ‘required’ or ‘will’.
- Core policy 21 – Suggest that the transport user hierarchy is updated to ‘Walking and wheeling’ to reflect the LTCP and ensure all users accessibility requirements are considered.

Core Policy 22: Assessing Transport Impact/Decide and Provide

- 3.108 – There is a grammatic error in the last sentence – “We will expect large-scale sites to ~~should~~ provide access for public transport vehicles”
- Support the policy and welcome reference to Oxfordshire County Council’s ‘Decide and Provide’: Requirements for Transport Assessments document.
- Encourage CDC to consider LTCP policy 12 regarding guidance for new developments and how it can be reflected in suitable policies, guidance and design codes.

Core Policy 23: Freight

- Welcome the inclusion of a freight policy and goal of the policy which aligns with OCCs Freight and Logistics Strategy. Suggest adding reference to the Freight and Logistics Strategy and how the Local Plan aligns with the priorities.
- Overall support the policy and the considerations for new freight facilities. New freight and logistic facilities should also consider opportunities to provide facilities for drivers e.g. parking spaces. An absence of suitable driver facilities and parking spaces leads to HGV drivers seeking places to take required breaks elsewhere such as on the road network or in residential areas.
- It is important to consider the importance of freight and logistics throughout the local plan to ensure an integrated approach. Consideration of freight should therefore also include how new homes, businesses and mixed used developments are served, opportunities to reduce emissions from freight and how freight contributes to broader goals such as the accessibility and inclusivity of places.

Core Policy 78: Delivery of Strategic Transport within the Kidlington Area

- References to ‘transport hub’ should be changed to ‘mobility hub’ throughout the Local Plan.

	<p>Core Policy 79: Safeguarding of Land for Strategic Transport Schemes in the Kidlington Area</p> <ul style="list-style-type: none"> • Support ongoing safeguarding of A44 park and ride site / mobility hub and references to OCC proposals to develop a network of mobility hubs. • As above, references to ‘transport hubs’ should be updated to ‘mobility hub’.
<p>Place Planning (North)</p>	<p>This response is from Place Planning (North), formerly known as Cherwell and West Infrastructure Locality Team.</p> <p>The Place Planning & Coordination North team has regularly met with Cherwell District Council officers as part of the jointly commissioned transport assessment to inform the draft Cherwell Local Plan. The OCC team also engage CDC officers on transport projects across the district.</p> <p>Core Policy Banbury Area Strategy – support the focus on previously developed land within the existing urban area as this supports the transport policies which aim to prioritise those walking, wheeling, cycling or using public transport. A number of improvement schemes will be required to make the town centre accessible by active travel and bus and these could be delivered or contributed towards by these sites.</p> <p>It will be important to firm up on the transport accessibility proposals as the site proposals are developed up. There is a clear opportunity to enhance the links between Banbury railway station and the town centre through the Canalside regeneration.</p> <p>Support the aim to deliver schemes to reduce transport congestion, particularly along Hennef Way. This can be achieved through a mixture of policies and designs that encourage less reliance on car-based trips from new developments, delivery of good quality active travel and public transport infrastructure, and the delivery of road enhancements where they enable a transformation of the overall travel network.</p> <p>Support the need for new developments to deliver active travel routes, including to the villages.</p> <p>Core Policy 63: Delivery of Strategic Transport Schemes within the Banbury Area – support the need to focus on sustainable connectivity. As stated, congestion is a particular issue in Banbury. The list of infrastructure requirements will need to be confirmed through the area travel plan work and any modelling and other transport planning assessment work for the Local Plan Review. There are some key active travel routes that OCC is progressing that will need to feed into the Plan as it is developed, as well as bus access schemes. There should be a link to the approved Banbury Local Cycling and Walking Infrastructure Plan (LCWIP) as this will be a key informant for the Infrastructure Delivery Plan.</p> <p>Core Policy 64: Safeguarding of Land for Strategic Transport Schemes in the Banbury Area – “Enlarged M40 slip roads at Southam Road in Banbury” – support this wording but this should read “new” slip roads as there are not any there at the moment. As part of the indicated “road network improvements” along Hennef Way, OCC used some Growth Deal funding to investigate the benefits and impacts of additional slip roads onto/from the M40 from Southam Road. OCC will consider whether these should form part of the area travel plan for Banbury and the modelling of the emerging sites within the Local Plan will provide the opportunity to consider their role within the Plan.</p>

As OCC develops the area travel plan for Banbury it will consider the need and role of a link between Bankside and Chalker Way. The lack of active travel and bus access between the southern parts of the town and the north-eastern area where much of the employment is located will result in increased congestion on Hennef Way unless mitigation measures are put in place. This work will be carried out at the same time as the modelling of the emerging Local Plan Review and should feed into the IDP considerations. It is therefore OCC's current view that land will need to be safeguarded for this link.

We also request that land is safeguarded for 'Land for improved walking / cycling facilities between Tramway Road and Banbury station.' – see comments on Core Policy 65 below.

Development Policy 6: Banbury Inner Relief Road and Hennef Way – OCC supports this policy, although the design of the Cherwell Street corridor will be evolving to have a more place-based approach rather than purely a functional transport movement role. How people use that space, better connectivity between the railway station / canalside area and the town centre, and opportunities to green the corridor will be key considerations. For the roads that make up the "inner relief road" and also Hennef Way, the area travel plan will assess the opportunities to provide for active travel and public transport both along these routes and across them, as part of the plans to reduce the congestion issues in the town. OCC is currently assessing a bus improvement scheme for Cherwell Street as part of the BSIP funding.

Core Policy 65: Development in the Vicinity of Banbury Railway Station – OCC support this policy. There is a need improve the active travel connection between Tramway Road and Station Approach. The scheme due for delivery in 2024 will provide a 2m wide footway, but as the Canalside redevelopment is designed it should provide the opportunity to enhance this connection to a 3m width with a 1m verge. On Tramway Road the proposed shared use path approaching the roundabout should be widened to provide a segregated facility. We request that land is safeguarded for 'Land for improved walking / cycling facilities between Tramway Road and Banbury station.'

Core Policy 66: Green and Blue Infrastructure in the Banbury Area – OCC support this policy and the need to improve the walking and cycling connections. There are a number of schemes mentioned here that OCC is looking to design up in transport terms, and this would provide the ideal opportunity for joint working to ensure greening is incorporated into these designs.

Core Policy 68: Banbury Canalside – the opportunities for active travel enhancements across this site should be a key element. Support the need for a high level of integration with the town centre. The opportunities for bus improvements and active travel along Cherwell Street or through the Canalside area should be explored.

Core Policy 69: Banbury Areas of Change – OCC support this policy and the focus on sustainable modes of transport. OCC's Place Planning & Coordination team will seek to feed into any considerations for these areas of the town to ensure the opportunities for improvements for active travel and bus journeys, and that the designs from a transport perspective have a place-based approach at their heart.

Core Policy 70: Bicester Area Strategy – we support the strategy seeking to reduce the need for out-commuting. Economic development needs to deliver high

quality active travel and public transport infrastructure to maximise the sustainability of these sites.

Support the strategy to redevelop Market Square – this is key for the area travel plan. Provision of high quality walking, cycling and bus connections into the Market Square, and designing with a placemaking approach to thoroughly consider the needs and aspirations of local people will attract more people in the town centre and reduce the impact of these additional movements.

Support the need to deliver schemes that reduce transport congestion, which could include a south-east link road. Reducing congestion will happen by delivering growth that is designed to maximise trips by sustainable modes. Previous work has shown how a south-east link road could provide the opportunity for a transformational change to the rest of the network with a clear priority given to those walking, wheeling, cycling or travelling by bus.

Support the strategy to strengthen connections between the town centre and Bicester Village. The opportunities to provide active travel connections will be set out in the area travel plan work and feed into the more detailed Plan proposals that emerge for Regulation 19.

Support the policy to ensure new developments deliver improved active travel routes, including to surrounding villages.

Core Policy 71: Delivery of Strategy Transport Schemes within the Bicester Area – we support this policy. The realignment of Howes Lane is an essential requirement for the North West Bicester development sites. The other three listed schemes will be further considered through the area travel plan work and feed into the modelling work for the emerging development sites.

Core Policy 72: Safeguarding of Land for Strategic Transport Schemes in the Bicester Area – we support the safeguarding of land for these three schemes. With regards to the south-east link road, the need and role of this new link road will be confirmed through the area travel plan work. The provision of a new link road (including bus and cycle measures) would need to be delivered alongside transformational change to the existing road network to significantly reduce car movements and improve accessibility by cycling, walking/wheeling and bus travel.

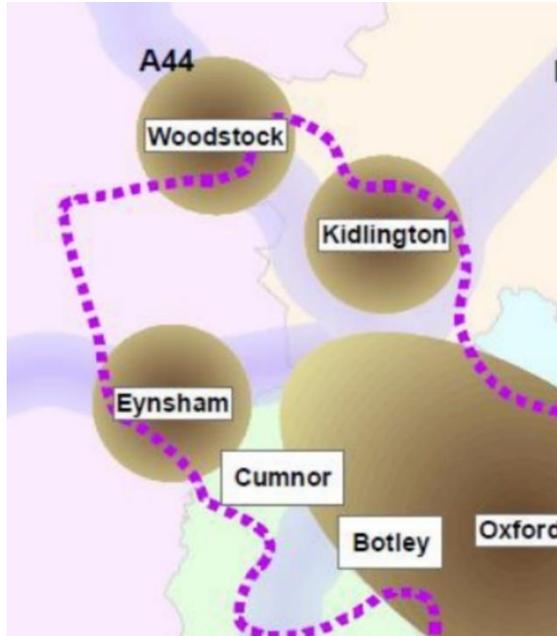
Core Policy 73: Delivery of Green and other Strategic Infrastructure in the Bicester Area – we support this policy. There are a number of opportunities here for partnership working to develop active travel schemes and other transport measures alongside green improvements, in particular at Market Square and Bicester village station.

Core Policy 74: Bicester Areas of Change – we support this policy and the proposal to undertake comprehensive masterplans including traffic management and pedestrian environment, sustainable transport connectivity, and public realm improvements including de-cluttering. OCC will want to be closely involved in Market Square and London Road in particular because of the transport elements of those projects.

Core Policy 76: Kidlington Area Strategy – the strategy to improve access to community facilities, sports and recreation spaces, and health care facilities should be supported by delivery of the measures identified within the Local Cycling & Walking Infrastructure Plan (LCWIP) and any local bus service or infrastructure

	<p>improvements. Delivering all such measures within a placemaking objective will ensure that infrastructure meets the needs and aspirations of local people who will use these spaces.</p> <p>We are pleased to see the delivery of the LCWIP specifically mentioned, including connections to the surrounding villages.</p> <p>Core Policy 78: Delivery of Strategic Transport Schemes within the Kidlington Area – we support this policy. The schemes identified in here will need to adhere to the adopted Central Oxfordshire Travel Plan and the emerging A44 travel plan. The policy mentions the prioritisation of the A44 over the A4260, which is understood, but it will be important that there is a sense of place as the route runs through Begbroke and Yarnton rather than just designing this as a movement corridor. This will need to be worked through with the local community to understand the use of this space and ensure the right crossing opportunities are in place.</p> <p>Core Policy 79: Safeguarding of Land for Strategic Transport Schemes in the Kidlington Area – we support this policy and in particular the safeguarding of land for the mobility hub on the A44. The A44 P&R/Transport Hub should be referred to as the A44 P&R/Mobility Hub. OCC are now working this up to be a mobility hub rather than a Park & Ride so that as well as bus and parking facilities there could be bike share, car club, micro-mobility, freight consolidation, other local services.</p> <p>Core Policy 80: Kidlington Green and Blue Infrastructure – we support this policy. All of these proposals will be important in encouraging an increase in people walking/wheeling or cycling.</p> <p>Core Policy 81: Kidlington Areas of Change – we support this policy and in particular the promotion of linkages to the village centre and improvements so sustainable transport. OCC will want to be part of the development of these areas from a transport and placemaking perspective.</p> <p>Core Policy 82: Heyford Area Strategy – we support the requirement for further transport investment as this is a challenging location to deliver sustainable transport connectivity. The draft strategy aims to improve the local facilities and enhance local sustainability in transport terms which is supported.</p> <p>Core Policy 83: Delivery of Strategic Transport Schemes within the Heyford Area – we support this policy and the transport infrastructure listed. It will be important to protect the local villages from the impact of further growth and work with local communities to develop mitigation measures.</p> <p>Core Policy 84: Safeguarding of Land for Strategic Transport Schemes in the Heyford Area – we support this policy.</p> <p>Core Policy 86: Rural Areas Strategy – we support the draft strategy’s increased emphasis on sustainable transport and active travel opportunities. Sites should help to deliver local links identified within the various LCWIPs and the Strategic Active Travel Network.</p>
<p>Central Oxfordshire Travel Plan</p>	<p>Reference should be made within the plan and its emerging policies to the Central Oxfordshire Travel Plan which covers the area out to and including Kidlington and Woodstock, and the strategic transport schemes central to it (Traffic Filters, Zero Emission Zone and Workplace Parking Levy) are expected to create a step change in Oxfordshire’s travel behaviour. We expect more people choosing to access</p>

Oxford by sustainable modes of transport as a direct result. Controlled Parking Zones (CPZs) should be considered for sites close to Oxford such as the draft site at Kidlington, as well as around Woodstock in proximity to the proposed A44 mobility hub.



Not exhaustive, but some of the relevant Actions from COTP that Cherwell DC should be taking account of the plan are:

Action 1 – Expanding upon the pilot scheme, develop proposals for a Zero Emission Zone (ZEZ) for Oxford city centre.

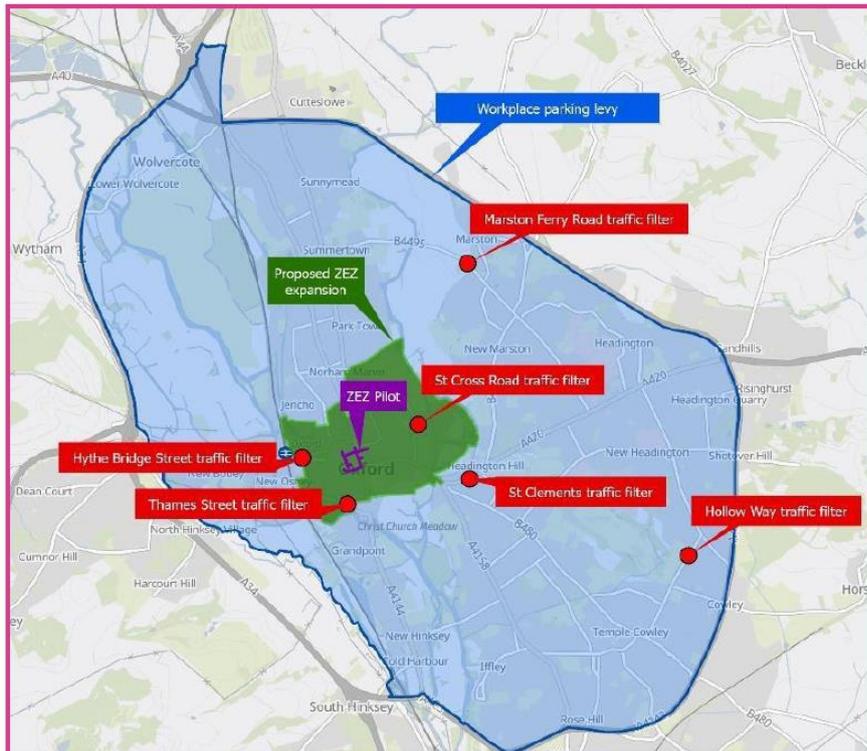
Action 2 – Develop proposals for a set of strategic traffic filters for locations across Oxford.

Action 3 – Develop proposals for a Workplace Parking Levy to cover businesses with 11 or more staff parking spaces in Oxford City Council’s administrative area, within the Oxford ring road.

Action 4 – Develop proposals for further Controlled Parking Zones (CPZ) across the city and to review eligibility and quantity of permits in existing CPZ areas.

Action 6 – Remove on-street public parking where necessary on corridors identified in the plan as either being active travel Primary Routes (Quickways) or situated on core bus routes.

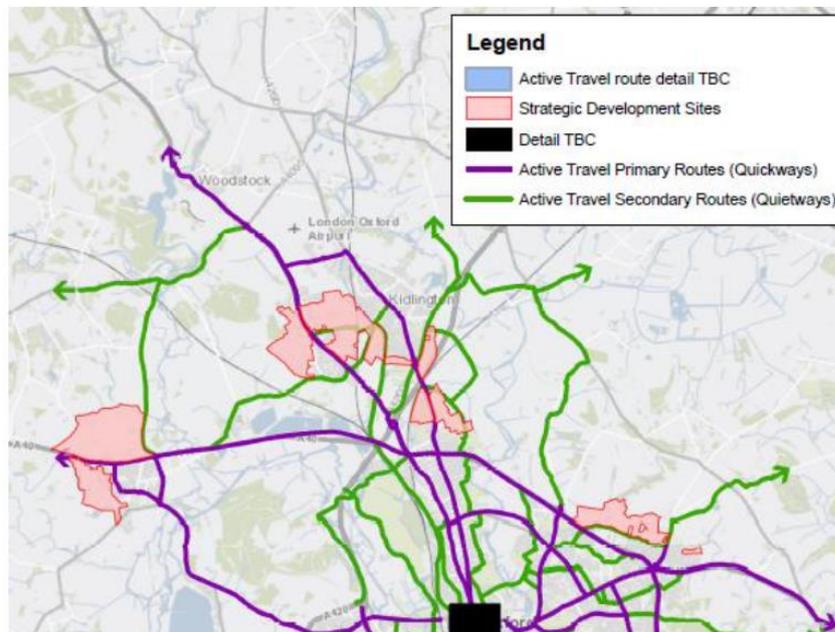
Proposed travel demand management measures



Mapped extents subject to further technical work and engagement

Action 9 – Deliver a central Oxfordshire cycle network, consistent with the Oxfordshire Strategic Active Travel Network and the latest LCWIP plans.

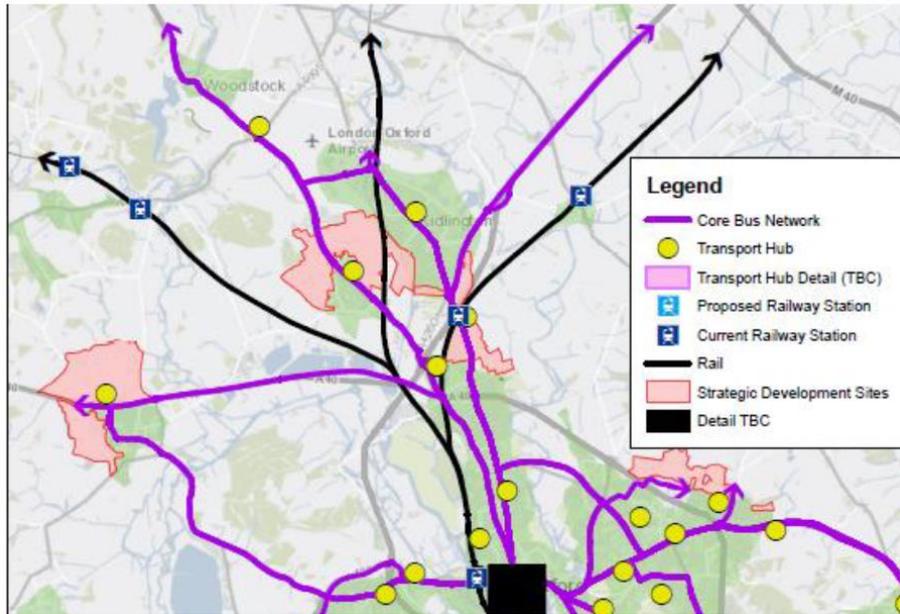
Proposed central Oxfordshire active travel network



Action 13 – Deliver:

- bus priority measures along key inter-urban bus routes and on key orbital routes in the Oxford area; and
- upgrade bus infrastructure (including at bus stops and to Real Time Information)

Proposed central Oxfordshire public transport and mobility hub network



Action 14 – Alongside partners, deliver a zero emission local bus fleet across the Oxford Smartzone area by 2024/25 and deliver a fully zero emission bus fleet across the COTP area at the earliest possible opportunity thereafter

Action 15 – Alongside partners, deliver:

- a) Oxford Station enhancements;
- b) a passenger rail service and two new passenger stations on the Cowley Branch Line; and
- c) local rail capacity and service frequency enhancements.

Action 16 – Deliver a mobility hub strategy for a network of mobility hubs across Oxfordshire.

Action 17 –

- Deliver a freight transfer / consolidation feasibility study and first / last mile delivery pilot.
- Support modal shift to cargo bikes and the electrification of freight deliveries

Action 20 - Alongside partners, deliver a Central Oxfordshire Movement and Place Framework.

Transport Development Management (North)

This response is from Transport Development Management (North), formerly known as Transport Development Control.

Comments on Appendix 2 – site development templates

LPR52 – North of Wykham Lane

The plan 'Indicative Strategic Green and Blue Infrastructure' shows public rights of way and a single route across the site for 'walking and cycling network'. There is no indication of vehicular access or bus route, and the walking and cycling network would need to be more comprehensive. The walking and cycling route appears to emerge at the SE corner onto Wykham Lane, which is not safe as either a pedestrian or cycle link to Bodicote village. Improvements would be required to Wykham Lane, or an alternative route provided.

Clarification is needed on the areas marked 'accessible green space' outside the site boundary, particularly the ones south of Wykham Lane, as we understand they are not publicly accessible or can be safely accessed.

If 'opportunities' are intended to list policy requirements this would need to be more comprehensive, including public transport improvements, contributions towards Banbury LCWIP improvements, and other off site highway improvements subject to transport modelling. The site should also provide for pedestrian and cycle improvements on Wykham Lane, to facilitate access to Bodicote and Bloxham.

LPR49 Withycombe Farm

This site is already the subject of a live planning application, ref 22/02101/OUT.

The site does not have direct frontage to the existing highway, therefore suitable access can only be acquired via a series of side roads of a consented development. This is a noted constraint to the site's accessibility for sustainable travel modes in terms of directness.

The development would have the potential to maximise accessibility for pedestrians and cyclists by providing access points into the site on all boundaries (subject to land ownership constraints).

Contributions will be required towards highway capacity improvements and bus services in the area.

Core Policy 14 (Site 2): Bolton Road

This site is in the town centre and as such we would support it having very low levels of car parking, including a large car free element, which may be necessary to mitigate the traffic impact.

The plan indicates community/garden streets, which emerge from the site at four locations. These are not all necessarily suitable as vehicular accesses and this should be clarified.

It should be a policy requirement for the site to improve pedestrian and cycle facilities on Castle Street and its junction with South Bar/Southam Road as well as improving the route between the northern part of Castle Quay/Canal/Spiceball Park and Cornmarket.

LPR55 Canalside

Requirements of the site should include towpath improvements to provide for cycling, including ramp between towpath and Tramway Road.

A footbridge is shown across the railway – footbridge(s) should also be indicated on linkages between the town centre and railway station, which should be clearer. The site should also deliver improved connectivity across Bridge Street, including improved pedestrian and cycle access to the station.

LPR56: Higham Way

It is listed as an opportunity to develop a footbridge or crossing over the railway. The policy wording will need to be stronger if this is to be secured.

There has previously been a requirement for a vehicular connection through the site to link to an adjacent site to the south, linking to Chalker Way. This should be

specified as a requirement, as the route to the north via Higham Way and Merton Street is not suitable for HGV access to the site.

Development here would provide the perfect opportunity to extend the bus service that currently terminates at Chalker Way to route back into the town centre via a bus gate on Higham Way, Merton Street and Bridge Street. Pedestrians and cyclists would also benefit alongside this extended bus route to a more direct and less trafficked connection between the town centre and the southern end of Chalker Way.

LPR21A – South-East of Wretchwick Green – Site A

The plans do not indicate vehicular access points. Two will be required, one on the A41 and one on Blackthorn Road. The latter will be closed to through traffic between the site access (just south of the railway bridge) and the A41, so the road through the site will connect Launton to the A41.

A Pegasus (or similar) crossing of the A41 will be required to connect the bridleways to the north (through the site) and to the south (to Ambrosden).

There is an opportunity for a pedestrian/cycle link to the Wretchwick Green development, as well as Symmetry Park. It should be a requirement to provide off-road pedestrian and cycle facilities along the north side of the A41 from Morrell Way (Symmetry Park access) to an appropriate point where the site borders the A41.

It should also be a requirement to modify and traffic-calm the Blackthorn Road so that it may be a safe active travel route and accommodate a two-way bus service.

LPR33 North-west Bicester

Traffic impact should be listed as a constraint. This site should not come forward before completion of the A4095 realignment, and additional mitigation is likely to be required.

The plan does not reflect the existing masterplan for NW Bicester, which forms the majority of the site. It does not acknowledge the A4095 realignment (which will form a key part of the walking and cycling network). This could potentially undermine what OCC are seeking to achieve in relation to existing planning applications.

The current planning application 21/04275/OUT (Hawkwell Village) proposes some residential development and solar panels in the area identified on the indicative plan as a 'green buffer'.

LPR37A: South of Chesterton and North-West of A41

Constraints should include the suitability and traffic capacity of Green Lane and The Hale.

Enhancement of pedestrian and cycle connectivity with the town centre etc. should be a requirement, not just an opportunity.

The plan should also show direct pedestrian/cycle links to the adjacent proposed employment allocation.

Due to the size of the site, it could not all be served by a bus service serving Chesterton as existing bus stops would be too distant.

Contributions will be required towards highway capacity improvements and bus services.

LPR21B: Land adjacent to Symmetry Park, North of A41, Bicester

A41 segregated cycleway will be required for active travel access to meet latest standards.

Pedestrian and cycle connections through Symmetry Park, Wretchwick Green and Land South East of Wretchwick Green would be a requirement.

Assessment of increase in traffic, particularly HGVs, at Morrel Way junction as well as at A41 junctions with B4011, Ploughley Road, Pioneer Road, Rodney House, Oxford Road and M40 J9 will be needed.

LPR38: Land east of M40 J9 and South of Green Lane, Chesterton

Should include a requirement for a cycle route through the site to the north, to Green Lane, and links to the adjacent proposed residential allocation.

There will be a requirement for capacity improvements at M40 J9 and contributions may be required to other highway improvements.

LPR8A: North of the Moors Kidlington

Should provide walking and cycle links to Kidlington village centre and the A4260.

Should enhance links to the Public Rights of Way network.

Opportunity to provide low level of car parking due to sustainability of site.

LPR2: South-East of Woodstock/Upper Campsfield Road

A comprehensive assessment of the development's access junction which would also serve the planned A44 Mobility Hub.

A vehicular link to/through the Park View development is a necessity – not just an opportunity.

Ensure that opportunities for the use of public transport are maximised. This should include measures to route the service through the development, taking advantage of its proximity to the planned Mobility Hub.

The scale of development proposed should be matched by the enhancements to active travel infrastructure giving emphasis on the crossing provisions across both the A44/Oxford Road and the A4095/Upper Campsfield Road.

Owing to the development's relationship with the planned Mobility hub there is rationale in having the estate roads covered by a CPZ to deter commuter parking.

LPR63: Begbroke Science Park

Crossings of the railway line to the east of the site are a key constraint given the desire to close level crossings on the Oxford corridor, particularly in light of planning increase in rail traffic as well as likely increase in demand for crossing.

Traffic congestion on North of Oxford Road corridors also a constraint.

Active travel connections to wider local area and settlements are key.

A44 corridor improvements, including bus priority, pedestrian and cycle route improvements and provision of safe crossings are a requirement.

Delivery of the A44 mobility hub at Oxford Airport as well as a local, smaller scale mobility hub within PR8 is required.

Enhanced public bus services to the site would be a requirement.

LPR42: South of Heyford Park

Key constraints should include traffic impact, given the rural location where people are likely to be dependent on cars.

There should be a requirement for additional off-site highway infrastructure (dependent on traffic modelling), as well as additional contributions to public transport.

It should be noted that a requirement of an earlier planning permission to reconnect the 'Aves Ditch' bridleway route across the flying field has not been delivered, and must be a pre-requisite of any further development at Upper Heyford.

To maximise active travel connectivity, there should be more connection points indicated to the existing settlement.

The policy should indicate an approximate alignment for a bus route through the site, taking into account the public transport strategy for the existing settlement.

Appendix 5 – Safeguarded land

Ardley Railway Station: The land is insufficient and doesn't include any access from the highway. If including a plan, it should be annotated to say it is an indicative position only and more land will be required.

A plan showing the alignment of the NW Bicester Strategic Link Road (A4095 realignment) should be included.

Core Policy 21

This section falls short of embedding LTCP policy into the Local Plan and is not strong enough to give the weight needed to support the whole range of LTCP policies. The following track changes are suggested to the first paragraph of the policy:

Development proposals must comply with the policies ~~The Council will support measures identified in~~ of the Oxfordshire Local Transport and Connectivity plan and support the measures identified in the area travel plans. Sites close to Oxford should also have regard to the Central Oxfordshire Travel Plan. ~~and~~ The Council will work with Oxfordshire County Council to ensure that transport improvements contribute positively to the attractiveness and safety of our places, quality of life in Cherwell, and respond sensitively to our natural and historic environment.

The 'decide and provide' policy requirement in the third paragraph is supported.

Core Policy 22

This policy focuses on contributions to increase public transport capacity but should also mention frequency. Frequency may need to be increased even if there is not currently overcrowding on services, in order to provide a sufficiently attractive alternative to the private car.

Under 'development proposals should, item i', there should be mention of sites needing to directly provide off site walking and cycling improvements where required as direct mitigation, as opposed to just making financial contributions.

Under 'development proposals should', item ii, linking the contribution directly to the projected number of additional trips could be unhelpful, as it depends on how the projection is calculated. i.e. a developer could argue that a high frequency bus service isn't proportionate because only xxx people are projected to use it.

The following track changes are suggested to the policy:

As set out in ~~The plan supports~~ Oxfordshire's Local Transport and Connectivity plan, a 'decide and provide' approach should be taken to help the delivery of public transport and active travel improvements as well as to manage the County's road network in a manner which reduces traffic and congestion.

Development that generates a significant number of trips will be required to be located in an area with access to frequent public transport services at an appropriate level of capacity. Improvements to the accessibility, frequency and capacity of public transport services to an appropriate level through contributions, or other infrastructure funding should be required. an appropriate level of public transport accessibility and where public transport capacity can accommodate the proposed increase in the number of trips, or where capacity can be increased to an appropriate level through contributions, or other infrastructure funding.

These developments will be required to submit a Transport Assessment or a Transport Statement and where relevant a Travel plan Transport Assessments should follow latest guidance from Oxfordshire County Council.

Development proposals should:

- i. Contribute towards the improvement of public transport and the improvement and delivery of walking and cycling routes that serve the site. This could be achieved through the design of development, direct delivery and/or through financial contributions appropriate to the scale and impact of the development;
- ii. Be expected to provide, or contribute to the provision of, new and/or improved public transport infrastructure and services proportionate to the projected number of additional trips arising from the development and considering cumulative impacts of other approved developments in the area;

	<p><u>Core Policy 23: Freight</u></p> <p>Given the requirement to locate these close to the SRN, there should also be a requirement to provide safe access by active travel, particularly cycling.</p> <p>There is a general issue around the loss of laybys for lorry parking to development sites in Oxfordshire which could be picked up here or separately. Developments which would result in the loss of a layby should be required to provide an alternative replacement unless it can be demonstrated the layby is not required for lorry parking.</p> <p><u>Core Policy 35: Settlement Hierarchy</u></p> <p>There is no explanation of how the villages have been categorised. For example the retail offer in some of the larger villages is very limited. Under 'Rural Areas' in the spatial strategy, 'larger and more sustainable villages' offer 'a wider range of services and are more well-connected to our urban areas'. As an example, Kirtlington would not fall into that category, due to the uncertain nature of future bus provision.</p>
<p>Lead Local Flood Authority</p>	<p>Core Policy 1: Mitigating and Adapting to Climate Change indicates under <i>viii. Minimising the risk of flooding and using sustainable drainage methods</i>. It is not clear what minimising means or whether there is a set target in relation to minimising the risk of flooding. This needs to be considered in relation to the comparison to National planning policy requirements and the evidence on what is required within Cherwell specifically, including where climate change may make areas unsustainable in the future or adaptations need to be made. Sustainability of drainage systems to facilitate development need to consider the longer term maintenance and operational requirements as well as the design.</p> <p>It is useful to see Core Policy 7: Sustainable Flood Risk Management as a stand alone policy. A flood risk assessment is stated as being required for areas of known flood risk and it is not clear if this has been mapped or is allocated within the Strategic Flood Risk Assessment (SFRA). Clarification of the second point under '<i>Flood risk assessments should assess all sources of flood risk and demonstrate that:</i>' section as it is not clear what this is aiming to achieve. It would be useful to understand how existing surface water flooding fits into the allocation of development under the sequential and exception tests as highlighted at the start of the Policy text.</p> <p>Core Policy 8: Sustainable Drainage systems (SuDS) could be set out better to identify what is needed from the developer when considering SuDS. This will ensure that they know what is expected at the outset including space and land requirements at the allocation stage. As the LLFA we also have Local Standards that we apply when we are considering surface water drainage. It would be useful to have in the accompany policy text a link to these.</p> <p>Indicative site Assessment templates</p> <p>A number of sites have areas of flood zones and areas at risk of surface water and groundwater flooding (as assessed by the SFRA) which is not mentioned in the key constraints in this section of the document. This should be acknowledged within the site assessments as it will likely to directly affect the size and nature of the development on this site. The Strategic Flood Risk Assessment (SFRA) dated November 2022 provides the evidence in relation to the flood risk for the allocations with an assessment of the impacts of all sources of flooding. The Summary of the</p>

	<p>SFRA suggests that LPR55 has a high risk of fluvial and a moderate risk from surface water and LPR56 has a high risk of fluvial flooding yet this is not identified within the site assessment.</p> <p>Other sites as indicated by the SFRA also have a Moderate risk of groundwater flooding, however this is also not included in the site assessment as a constraint with how this has been considered in the allocation of sites.</p> <p>The SFRA also indicates sites that could include opportunities to provide areas of natural flood management. These are noted in section 4 of the SFRA and include LPR33, LPR37, LPR42a and LPR63, however within the Local Plan 'Indicative Site Development Templates' only LPR63 includes for the potential of nature based flood risk management measures as an opportunity. This is likely to be required to be set out in Local planning policies in order to be effective.</p>
Water	<p>In the draft Core Policy 1 'Mitigating and Adapting to Climate Change' part 'iv' is 'Designing and delivering developments that, wherever possible, have zero carbon emissions and use resources efficiently, including water. All new residential development will be required to meet a water efficiency of no more than 110 litres/person/day mains water consumption'. Further, draft Core Policy 9 re-iterates: 'New developments are required to be designed to a water efficiency standard of 110 litres/head/day (l/h/d) for new homes'.</p> <p>The standard of 110 litres per person per day is in line with government advice. The then Secretary of State for Defra wrote to local authorities in July 2021 asking them to adopt this as a building standard where there is a local need, such as in water stressed areas like the South East.</p> <p>The standard envisages that new development will be designed with efficient fixtures and fittings. Water butts and innovative solutions such as grey water recycling will also help drive down mains water consumption.</p> <p>There is a national target of water consumption to be an average of 110 litres per person per day or less by 2050 in the National Framework for Water Resources produced in March 2020. The latest Water Resources Planning Guideline (WRPG) from April 2023 states that the water companies' plans and programmes should be based on that.</p> <p>The government published the Environmental Improvement Plan in January 2023, which builds on the national target with interim targets to reduce the use of public water supply in England per head of population by 9% by 31 March 2027 and 14% by 31 March 2032, and a longer term target of 20% by 31 March 2038. This is to be achieved by reducing household water use, reducing leakage and reducing non-household (e.g. business) water use.</p> <p>Water Resources South East (WRSE) released its final draft regional plan on 31st August 2023. This plan includes reducing per capita consumption over time from the current 150 litres per person per day to below an average of 110 litres by 2050, also complying with the interim targets as set out in the government's Environmental Improvement Plan. It is expected that this will require not only new build housing and renovations to be designed to be efficient with water, but also that home occupiers change their ways to use less water. Smart meters are helping companies to better understand how water is used, and data from companies that have installed smart meters shows that many people typically use between 100 and 110 litres per day,</p>

	<p>but a moderate proportion of very high users exists that causes average usage to be higher. Local Plan policy could also encourage the take up of smart meters.</p> <p>Reduced demand, together with the reduced leakage targets in the final draft regional plan will together reduce the need for new infrastructure and abstractions as the population grows. At present, nearly 16% of the water that is treated and put into supply in the South East is lost through leaks from water companies' and customers' pipes.</p> <p>Thames Water is the company that provides water to most of Oxfordshire. Its individual Water Resource Management Plan 24, also released in final draft form on 31st August 2023, has an initial focus on delivering ambitious programmes of demand management.</p> <p>The WRSE and Thames Water plans envisage a need for a 150 Mm3 South East Strategic Reservoir by 2040, even with the demand management proposed. Thames Water is therefore progressing work towards a Development Consent Order application for the reservoir. Oxfordshire County Council and Vale of White Horse District Council, along with others, have opposed the reservoir proposals, but support the demand management measures.</p> <p>We would like to see further refinement of Core Policies 1 and 9 for the Cherwell Local Plan 2040 to consistently refer to litres per person per day and allow for improvement on the target to less than 110 litres. The policies should read: 'All new residential development will be required to meet a water efficiency standard of no more than 110 litres/person/day mains water consumption and will be expected to take opportunities such as providing water butts and installing smart water meters'.</p>
<p>Education</p>	<p><u>District wide policies</u></p> <p>Paragraph 3.292: <i>We will work with the County Council and others to provide nursery, primary and secondary schools, further and higher education facilities, community learning facilities, special schools, free schools and other educational facilities.</i></p> <p>The phrase "free schools" is redundant. "Free schools" is the term used for new provision academies. Under current government policy, all new provision schools are expected to be academies, and would be termed "free schools".</p> <p>Paragraph 3.294: <i>We will seek to ensure that new and extended schools are built to the highest sustainable construction standards. New facilities should also be designed to be flexible enough to accommodate the future changing needs of users and the communities they serve. Where appropriate, the use of school and college buildings and land after hours, will be encouraged to support learning across the wider community and community use of education facilities, for example sport and recreation facilities, will be supported.</i></p> <p>Oxfordshire County Council supports the aspiration that school facilities are available for community use, but notes practical constraints on the extent to which this can be ensured, and considers that any policies would need to be carefully worded to ensure they are deliverable. Policies should encourage rather than require joint use. Any school's primary function must be the education and safeguarding of their pupils, which will provide constraints on the type of facilities provided, and when they can be available for external use. Strict school safeguarding requirements mean that any community use has implications for school building and site design,</p>

and where these increase the costs of building new school accommodation, there may be viability constraints; there may also be limits to how far an existing school's accommodation can be adapted without excessive cost. Management of community use is an additional resourcing requirement for school management, and in particular small schools may not have the capacity to provide this. Finally, increasing numbers of schools are now academies, and any new schools would be expected to be academies, and these operate independently of council control, meaning that they cannot be required to deliver community use by the council. Dual use of new school facilities cannot therefore be required by the planning system, as at the point of a new school being planned, the academy trust which will be the responsible body for the school is not yet known; and the county council cannot enforce community use upon an academy.

Banbury Area Strategy

The number of schools within Banbury, including sites previously identified for a new primary school south of Salt Way, a new secondary school south of Bankside, and expansion land for Longford Park School, provide flexibility for absorbing population growth through use of existing school capacity, expansion of existing schools and the delivery of new schools. It is therefore expected that the necessary school provision could be provided in a sustainable manner.

Bicester Area Strategy

The number of schools within Bicester, including sites previously identified for new schools in NW Bicester and SE Bicester, provide flexibility for absorbing population growth through use of existing school capacity, expansion of existing schools and the delivery of new schools. It is therefore expected that the necessary school provision for housing development within or immediately adjoining Bicester could be provided in a sustainable manner. However, it is expected that any additional primary school capacity needed as a result of site LPR37a would need to be delivered within Bicester, as the existing primary school in Chesterton is on too small a site to expand.

Kidlington Area Strategy

The number of schools in the Kidlington area provide flexibility for absorbing population growth through use of existing school capacity and expansion of existing schools. It is therefore expected that the necessary school provision could be provided in a sustainable manner for LPR8a, North of the Moors.

The proposed allocation south east of Woodstock, LPR2, would be expected to increase the population within the catchment area of Woodstock CE Primary School beyond the primary school's capacity to offer places, without making viable a new school. It would, therefore, be dependent on additional capacity being provided at the planned new schools in the existing Local Plan PR8 site at Begbroke.

Heyford Park Area Strategy

Further housing growth here would need to facilitate the expansion of primary and secondary school capacity within the Heyford Park area. This is expected to require a 2.22ha site for a new primary school facility, and potentially additional sports provision for use by the secondary school.

Rural Areas Strategy / Core Policy 35 Settlement Hierarchy

Smaller towns and villages, with just one primary school, are very diverse in how their schools could accommodate population growth. In recent years there has been a general fall in births, and many schools, particularly in rural areas, have some degree of spare places. Modest scales of housing growth in these towns and villages could help sustain the local school, and indeed in the absence of new family housing, some small village schools may experience declining pupil population to the extent that the school becomes unviable. The type of housing permitted will also be relevant to pupil generation, and should be taken into account when assessing the impact of housing proposals on school sustainability.

However, this demographic pattern is subject to change for reasons beyond local control, and therefore it is difficult to be certain about the existence of spare capacity on the timescale required for the Local Plan. In other villages and small towns, schools remain full and may be on sites which do not support expansion. A generalised approach to identifying which small town and village schools could accommodate housing development is therefore difficult. The Local Plan should allow for flexibility such that proposals for housing development in villages can be assessed based on the latest available data.

Villages with no state primary school should only be considered sustainable locations for new family housing if it can be demonstrated that children would not require vehicular transport to school.

Of the smaller villages listed in the settlement hierarchy, Cropredy, Finmere, Fringford, Fritwell, Hornton, Islip, Sibford Gower and Wroxton all have state primary schools (as do Chesterton and Upper Heyford, but these have proposed housing allocations). The assessment of proposals for housing development in these villages should take into account whether they would improve the sustainability of the village school.

Indicative site development templates

Site LPR52: North of Wykham Lane

Under Key Opportunities it is suggested that this site would contribute towards expansion of Bishop Loveday Primary School. Expansion of this school is not planned. The necessary additional school provision would be delivered off-site. Expansion of school capacity is not a specific opportunity of this site, but if reference is to be retained, then the wording should be changed to:

“Contribution towards the expansion of ~~Bishop Loveday Primary School, the expansion of secondary school capacity in Banbury~~ early years, primary, secondary, special education and additional healthcare provision ~~serving the area;~~”

Site LPR2: South-East of Woodstock /Upper Campsfield road

Under Key Opportunities it is suggested that this site would contribute towards expansion of Woodstock CE Primary School. However, further expansion of this school is not possible, and this site would need to contribute towards a new off-site primary school. It is expected that this would be one of the planned new schools within the CDC Local Plan Partial Review strategic site PR8, at Begbroke, and any policies regarding this site should include good active transport routes between the site and the Begbroke development.

Expansion of school capacity is not a specific opportunity of this site, but if reference is to be retained, then the wording should be changed to:

	<p><u>“Opportunities to contribute towards the expansion of Woodstock CE Primary School and/or contribute towards a new primary school expansion of early years, primary, secondary and special education provision serving the area.”</u></p> <p>LPR37A: South of Chesterton and North-West of A41 It is expected that the necessary additional school provision would be delivered off-site, within Bicester, and any policies regarding this site should include good active transport routes between the site and schools in Bicester. Expansion of school capacity is not a specific opportunity of this site, but if reference is to be retained, then the wording should be changed to: “Contributions towards expanded school provision, including special educational needs<u>the expansion of early years, primary, secondary and special education provision serving the area;</u>”</p> <p>LPR42: South of Heyford park Under Key Opportunities it is suggested that this site would contribute towards expansion of the existing Heyford Park all through school. At this stage it cannot be assumed that the necessary primary school capacity would be delivered as part of the existing school; a separate new school may be more appropriate. The site masterplan should include a suitable 2.22ha site for a new primary school facility. Wording should be changed to: “Opportunities to expand the existing Heyford Park 2 form entry allthrough school<u>contribute towards the expansion of early years, primary, secondary and special education provision serving the area;</u>”</p> <p>LPR49: Withycombe farm; Core Policy 14 (Site 2): Bolton Road, LPR55: Canalside, LPR21A: South-East of Wretchwick green - Site A; and LPR8A: North of The Moors If reference to school capacity is retained for LPR52, then for consistency, Key Opportunities for other housing sites should also include: <u>“Opportunities to Contribute towards the expansion of early years, primary, secondary and special education provision serving the area.”</u></p>
<p>Property (Education)</p>	<p>Core Policy 52 required new educational buildings to be built to net zero standards. Oxfordshire County Council uses the Department for Education Construction Framework for the delivery of new school projects, and the requirement now is that all new school buildings must be net carbon zero in operation, suggest policy wording is amended as below. “New educational buildings should be located in sustainable locations and built to net zero carbon <u>in operation</u> standards as required by <u>Core Policy 4</u> <u>the Department for Education.</u>”</p>
<p>Property</p>	<p>As work on the Infrastructure Schedule accompanying the plan progresses, we would welcome continued engagement and ask that CDC consider the following updates:</p> <p><u>Extra Care Housing</u></p> <p>The Council’s focus remains on supporting those with care act eligible needs to access affordable Extra Care Housing and to have this reflected within the Districts and City local plan policies. Where it’s not favourable to develop Extra Care Housing as part of the affordable housing requirement, other forms of all-age affordable</p>

specialist supported housing should be proposed within development sites to meet identified needs.

HWRC's

Our HWRC strategy was approved at [Cabinet on 19 September 2023](#) and states that we are looking to secure, maintain and enhance our HWRC sites, seeking to expand and/or reorganise the layout where possible, prioritising additional capacity to accommodate the growing population, for reuse and repair, and to enable us to collect and segregate more materials for recycling, covering sites so they are more attractive for residents to use in all weathers and light levels, and also increasing the quality of materials, maximising the amount that can be reused and recycled. We will be looking to use existing S106 money to fund part of the expansion of sites to increase capacity, and will be seeking contributions in the normal way for any new allocations/applications.

Fire Service

The Oxfordshire Fire & Rescue Service (OFRS), Property and Emergency Response Strategy went to Cabinet in September with the aim of providing the following long term benefits:

- (a) Facilitating service delivery, by providing fit for purpose buildings for fire and rescue.
- (b) Supporting Oxfordshire communities, by providing two new community fire stations.
- (c) Reducing our carbon footprint through more energy efficient and greener buildings.
- (d) Enabling agile working and rationalisation of our estates.
- (e) Maximising our potential investments, through an avoidance of significant capital expenditure through the realisation of existing capital assets.
- (f) Develop safer fire stations that addresses the contaminants cancer risks posed to firefighters.

The service is currently reviewing all its fire stations against the above aims; and the property needs for the service within the District can then be confirmed. There is also a need to consider an increase in our provision of internal training sites within OFRS (within District this is at Banbury). There are opportunities to collaborate with local Thames Valley Fire and Rescues Services or other blue light responders such as Thames Valley police (TVP), and South-Central Ambulance Service (SCAS) to form Blue Light Hubs.

Adult Day Care

The service currently uses two properties in the District, Bicester CSS and Redlands in Banbury. Redlands has some scope for efficiency works and expansion, however Bicester is limited in potential. The site in Bicester also picks up demand from the already over subscribed site in Oxford. The service policy is to improve/expand existing premises before looking at new premises, however with the large expansions planned for Bicester, there may be an opportunity to secure some dedicated community space for a new Day centre if designed well.

	<p><u>Supported Transport</u></p> <p>The Supported Transport team are a statutory service who operate a fleet of minibuses to help school children who struggle to get into and out of school on a daily basis. The service is looking to expand and requires modern, fit for purpose depot and parking sites to meet the demand created by new development. This will either be by expansion and improvement of current facilities, or the provision of new sites where appropriate.</p>
<p>Affordable, Extra Care and Key Worker Housing</p>	<p>Suggested amendments to Core Policies 36 and 38 are marked below.</p> <p>We recommend deletion of part of Policy 38 as we do not want to limit the cascade to just housing for older people. If a site can demonstrate demand for other forms of specialist supported housing for younger people e.g., those with Learning Disability or ill mental health, we should consider these options in the overall requirement for affordable housing.</p> <p><u>“Core Policy 36 Affordable Housing:</u> All proposed developments that include 10 or more dwellings (gross), or which would be provided on sites suitable for 10 or more dwellings (gross), will be expected to provide at least 30% of new housing as affordable homes on site. First homes should make up 25% of all homes on sites and should have a discount of 30%. The majority of first homes should be 2 bedroom. Affordable housing is expected to be met on site unless there are exceptional circumstances and where off-site provision or an appropriate financial contribution in lieu can be robustly justified. Where this policy would result in a requirement that part of an affordable home should be provided, a financial contribution of equivalent value will be required for that part only. Otherwise, financial contributions in lieu of on-site provision will only be acceptable in exceptional circumstances. All qualifying developments will be expected to provide 70% of the affordable housing as affordable/social rented dwellings and 30% as other forms of affordable homes. It is expected that these requirements will be met without the use of social housing grant or other grants. <u>Sites of at least 400 dwellings will be expected to provide a minimum of 60 units of affordable rental Extra Care Housing. Where it’s agreed with Council that affordable Extra Care Housing would not be desirable, an equivalent amount of alternative affordable specialist supported housing should be provided. Where demand for affordable specialist housing is already met in the vicinity, a financial contribution in lieu may be agreed as an exception.”</u></p> <p><u>“Core Policy 38: Specialist Housing.</u> Housing sites will be expected to provide extra care dwellings (C3 use class) as part of the overall mix. The proportion of extra care housing units is to be agreed with the Council based on the nature of the site and proposals in question and having full regard to the evidence of need for these units. Should it be agreed with the Council that extra care housing would not be desirable in a particular location, an equivalent amount of alternative specialist housing (use class C3) for older people will be required. Elsewhere, opportunities for the provision of extra care, specialist housing for older and/or disabled people and those with mental health needs and other supported housing for those with specific living needs will be encouraged in suitable locations close to services and facilities. We will support residential care homes (C2 use classes) and developments which provide for a mix of use classes C3 and C2 where the appropriate infrastructure is provided.</p>

	<p><u>Some specialist housing is expected to be part of the affordable housing component of a development, as required by other policies in this Plan.”</u></p> <p>The current Cherwell Local Plan has a Policy BSC4 requiring extra care housing on sites which involve more than 400 houses. The new Local Plan should include a policy, as set out above, so that viable affordable extra care housing developments of at least 60 units are established on new strategic sites. That such was not included in the Local Plan Partial Review was an oversight, as it was understood that Policy BSC4 applied.</p> <p><u>Key Workers</u></p> <p>Following the recent publication of our draft Adult Social Care Workforce Strategy, which clearly outlines higher than national average housing costs within Oxfordshire as an obstacle to the recruitment and retention of social care professionals, we would welcome the inclusion of key worker housing allocation policies within the Local Plan.</p> <p>Recruitment into the sector remains a significant challenge within Oxfordshire; we see key worker housing provision as a key enabler in ensuring we can attract and retain a talented pipeline of social care professionals to meet the current and projected workforce capacity. It is worth highlighting that we would like to see key worker definitions that recognise the multiple roles within social care and not just NHS employees.</p>
<p>Archaeology</p>	<p>Overall, the approach to archaeology and the historic environment is supported. We would welcome further discussion on improvements that could be made to the area and site specific sections of the plan.</p> <p><u>Core policy 8: Sustainable Drainage Systems (SuDS)</u> This policy should highlight the need to avoid physical impacts to significant heritage assets and to mitigate any impact to less than significant heritage assets.</p> <p><u>Core policy 31: Tourism</u> This policy should also highlight the need to avoid physical impacts to significant heritage assets and to mitigate any impact to less than significant heritage assets.</p> <p><u>Core policy 32: Town Centre Hierarchy and Retail Uses</u> Many of our towns and villages have developed since the Saxon period, and in some cases earlier, and as such the centre of these settlements are frequently of high archaeological significance. Whilst we support the sustainability of such important centres this is therefore likely to have an impact on the historic value of them. This will need to be carefully managed and this policy should therefore set out the need for such development to conserve and enhance the historic environment.</p> <p>Core Policies 57 - 59: Historic Environment and Archaeology</p> <p>3.340 The district contains over 2,100 recorded archaeological sites.</p> <p>3.343 CDC maintains a list of buildings they have identified as ‘local heritage assets’. These however are not supplied to the Oxfordshire Historic Environment Record (HER) and so will not be supplied to developers when ordering this HER data. It will therefore be useful for this plan to highlight that in addition to HER data any assessment will need to contact the District directly to obtain a list of these. It may be useful to include this in 3.347.</p>

3.348 It would be useful for this section to state that any archaeological desk-based assessment should be undertaken in line with an agreed written specification to ensure that appropriate data is considered.

These heritage policies do not appear to have been considered in the area specific section of this plan starting at Chapter 4. Many of the key towns and development areas within Cherwell are located in areas of significant archaeological and historical interest such as the medieval hearth of Banbury or the Roman and Saxon remains at Bicester. The impact of development within these areas on the historic environment will need to be carefully managed to avoid the loss of fragile remains related to the development of these settlements.

In many cases these sections highlight the need to consider the impact on built heritage but the need to consider the impact on surviving archaeological remains has not been included. We would recommend that this section should include the need to consider this impact and to seek out opportunities to enhance the historic environment as part of any development proposals.

Indicative site development templates

Banbury

LPR52: North of Wykham Lane

The site lies immediately south of an area which has been subject to a scheme of archaeological mitigation. The excavation recorded Iron Age enclosures and possible boundary ditches, 246 Iron Age storage pits, some of which contained human burials, there were also as some Neolithic pits and possible Bronze Age barrows. A further possible barrow was recorded on aerial photographs on the southern boundary of the proposal site, though this has been destroyed by development.

In accordance with the National Planning Policy Framework (NPPF 2021) paragraph 194, we would therefore recommend that, prior to the determination of any planning application the applicant should be responsible for the implementation of an archaeological field evaluation.

This must be carried out by a professionally qualified archaeological organisation and should aim to define the character and extent of the archaeological remains within the application area, and thus indicate the weight which should be attached to their preservation. This evaluation must be undertaken in line with the Chartered Institute for Archaeologists standards and guidance for archaeological evaluation including the submission and agreement of a suitable written scheme of investigation.

LPR49: Withycombe Farm

Conditionally approved.

Core Policy 14 (Site 2): Bolton Road

The site is located in an area of archaeological interest adjacent to the northern edge of the medieval town. The site lies immediately east of the Medieval North Bar. Archaeological evaluation ahead of proposed development of the former Bingo Hall has recorded a large medieval ditch with wooden revetment posts running along the northern edge of the site. This is likely to represent the northern limit of the medieval town. The eastern side of the site has not yet been subject to any archaeological investigations but this feature is likely to continue into this section of

this proposal allocation. There is therefore a strong likelihood that further medieval remains related to the development of the town could survive on the site.

In accordance with the National Planning Policy Framework (NPPF 2021) paragraph 194, we would therefore recommend that, prior to the determination any planning application, the applicant should be responsible for the implementation of an archaeological desk-based assessment and field evaluation.

These must be carried out by a professionally qualified archaeological organisation and should aim to define the character and extent of the archaeological remains within the application area, and thus indicate the weight which should be attached to their preservation. This evaluation and assessment must be undertaken in line with the Chartered Institute for Archaeologists standards and guidance for archaeological evaluation including the submission and agreement of a suitable written scheme of investigation.

LPR55: Canalside

This area is located within part of the historic Canal Wharfs of Banbury which are of high local importance. These areas appear as fairly undeveloped on the first edition OS maps and there still remains a large amount of open ground within the current warehouse building currently on the site. It is possible that within some of these areas remains relating to this important part of local history will survive, along with the possibility of earlier remains also surviving.

In accordance with the National Planning Policy Framework (NPPF 2021) paragraph 194, we would therefore recommend that an archaeological desk-based assessment is produced to assess the impact of any development on these remains.

This assessment must be undertaken in line with the Chartered Institute for Archaeologists standards and guidance for archaeological evaluation including the submission and agreement of a suitable written scheme of investigation.

LPR56: Higham Way

Already allocated.

Bicester

LPR21A: South-East of Wretchwick Green and LPR21B: Land adjacent to Symmetry Park, North of A41

This site is located in an area of archaeological interest immediately north of an area where a series of Roman field systems have been recorded from archaeological investigations. These field systems have been interpreted as a Roman Vineyard. This is a very rare example of Roman wine production. A geophysical survey has been undertaken on this site which has recorded a number of probable archaeological features across the site.

In accordance with the National Planning Policy Framework (NPPF 2021) paragraph 194, we would therefore recommend that, prior to the determination any planning application the applicant should be responsible for the implementation of an archaeological field evaluation.

This must be carried out by a professionally qualified archaeological organisation and should aim to define the character and extent of the archaeological remains within the application area, and thus indicate the weight which should be attached to

their preservation. This evaluation must be undertaken in line with the Chartered Institute for Archaeologists standards and guidance for archaeological evaluation including the submission and agreement of a suitable written scheme of investigation.

LPR33: North-West Bicester

The site is in an area of archaeological interest and has recently been subject to a geophysical survey. The survey did not highlight any archaeological features, though these results will have to be confirmed in accordance with the National Planning Policy Framework (NPPF 2021) paragraph 194, the implementation of an archaeological field evaluation.

This must be carried out by a professionally qualified archaeological organisation and should aim to define the character and extent of the archaeological remains within the application area, and thus indicate the weight which should be attached to their preservation. This evaluation must be undertaken in line with the Chartered Institute for Archaeologists standards and guidance for archaeological evaluation including the submission and agreement of a suitable written scheme of investigation.

LPR37A: South of Chesterton and North-West of A41

The site lies in an area of archaeological interest, immediately west of the Alchester Roman Town Scheduled Monument. The surrounding area has been subject to a number of archaeological investigations which have consistently recorded Roman occupation. Immediately north of the site a recent geophysical survey recorded a number of enclosure ditches and a possible trackway which dates from the Late Iron Age/Romano British period (EOX6482). At the eastern end of the site an excavation recorded a Bronze Age cremation urn (EOX 1786), and the north eastern boundary of the site is the west section of Akeman Street, a Roman Road leading from Alchester to Cirencester (PRN 8921). The setting of the Scheduled Monument may present a barrier to this development.

In accordance with the National Planning Policy Framework (NPPF 2021) paragraph 194, we would therefore recommend that, prior to the determination of any planning application the applicant should be responsible for the implementation of an archaeological field evaluation.

This must be carried out by a professionally qualified archaeological organisation and should aim to define the character and extent of the archaeological remains within the application area, and thus indicate the weight which should be attached to their preservation. This evaluation must be undertaken in line with the Chartered Institute for Archaeologists standards and guidance for archaeological evaluation including the submission and agreement of a suitable written scheme of investigation.

LPR38: Land East of M40 J9 and South of Green Lane

The site is located in an area of considerable archaeological interest to the west of the scheduled monument of Alcester Roman Town (SM 18). The proposed site is along the line of the Roman Road heading west from this Roman town as evidenced by a series of cropmarks recorded and transcribed by Historic England. The site is also located in the area of a Grange held by Thame Abbey in the area and recorded in 1179AD. Although the actual location of the grange is unknown it is thought to be located within the area of Grange Farm and a rectangular enclosure within this application area has been recorded from Environment Agency Lidar. Iron Age settlement activity has been recorded to the west of the site and Medieval settlement

has been recorded south of the site, immediately south of the M40 along with Iron Age activity in the form of a pit.

In accordance with the National Planning Policy Framework (NPPF 2021) paragraph 194, we would therefore recommend that, prior to the determination of any planning application the applicant should be responsible for the implementation of an archaeological field evaluation.

This must be carried out by a professionally qualified archaeological organisation and should aim to define the character and extent of the archaeological remains within the application area, and thus indicate the weight which should be attached to their preservation. This evaluation must be undertaken in line with the Chartered Institute for Archaeologists standards and guidance for archaeological evaluation including the submission and agreement of a suitable written scheme of investigation.

Kidlington

LPR8A: North of The Moors

The site is located in an area of archaeological interest related to Iron Age, Roman and medieval settlement. A series of Iron Age to medieval ditches were recorded immediately east of the proposed site ahead of a small development and Prehistoric flints, Roman pottery and Roman coins have been found within the proposed site. Further Roman coins have been also been recovered to the north west of the site. A series of enclosures have been recorded from cropmarks 240m south east of the site. The proposed development is also located immediately west of the line of the Oxfordshire ridgeway (Grundy's 'Road 2'). This route is recorded in Saxon charters and sections of this route may be originated in the Roman period.

A medieval moat has been recorded to the east of the proposed site, the western arm of this moat forming part of the eastern extent of the proposed development site. Medieval settlement is recorded between this moat and the medieval Church. A roman well has also been recorded to the north west of the Church, 200m west of this proposed development. An undated well has been recorded within the proposed site itself.

In accordance with the National Planning Policy Framework (NPPF 2021, paragraph 189), we would therefore recommend that, prior to the determination of any planning application for this site the applicant should be responsible for the implementation of an archaeological field evaluation.

This must be carried out by a professionally qualified archaeological organisation and should aim to define the character and extent of the archaeological remains within the application area, and thus indicate the weight which should be attached to their preservation. This evaluation must be undertaken in line with the Chartered Institute for Archaeologists standards and guidance for archaeological evaluation including the submission and agreement of a suitable written scheme of investigation.

This information can be used for identifying potential options for minimising or avoiding damage to the archaeology and on this basis, an informed and reasonable decision can be taken.

LPR2: South East of Woodstock/Upper Campsfield Road

The site is in an area of considerable archaeological potential and interest, and has previously been subject to an aerial photography and geophysical survey. The surveys identified a number of features that may be archaeological in nature such as linear crop marks, former field boundaries, and an area of settlement that correlates with geophysics. In the north east and north west corners of the site, a complex of anomalies showed a series of linear features of Late Iron Age and Roman date which certainly represent concentrations of occupation.

More significantly, within the proposed development area is the Scheduled Monument of Blenheim Villa (SM35545), and its associated fields and paddocks. The site of the villa can be seen from a distance as a low mound outlined against the northern boundary of the field. It was first identified by aerial photography in the summer of 1971, when the buried stone walls and surrounding enclosure ditches showed clearly as cropmarks. The outline and internal arrangement of rooms were clearly visible, and the plan and dimensions were subsequently confirmed by limited excavation in 1985, when the walls were traced by trial trenching; pottery found in the excavation dated to the third and fourth centuries AD. This site is of national importance and under the NPPF, this will be a major constraint to development, and any work which may impact the setting of the villa will also likely face barriers.

In accordance with the National Planning Policy Framework (NPPF 2021, paragraph 189), prior to the determination of any planning application for this site the applicant should be responsible for the implementation of an archaeological field evaluation.

This must be carried out by a professionally qualified archaeological organisation and should aim to define the character and extent of the archaeological remains within the application area, and thus indicate the weight which should be attached to their preservation. This evaluation must be undertaken in line with the Chartered Institute for Archaeologists standards and guidance for archaeological evaluation including the submission and agreement of a suitable written scheme of investigation.

This information can be used for identifying potential options for minimising or avoiding damage to the archaeology and on this basis, an informed and reasonable decision can be taken.

LPR63: Begbroke Science Park

An archaeological evaluation has been completed for this site and the report is in preparation. As such the mitigation can be managed through suitable conditions; the applicant is aware of the heritage implications of this proposal.

Heyford

LPR42A: South of Heyford Park

The north eastern end of the site has been subject to a geophysical survey which recorded ditches in a rectangular enclosure which could represent a prehistoric feature. The remainder of the north eastern part of the site will have to be subject to a geophysical survey and the of this area will likely need a trenched evaluation, in accordance with the National Planning Policy Framework (NPPF 2021) paragraph 194.

	<p>This must be carried out by a professionally qualified archaeological organisation and should aim to define the character and extent of the archaeological remains within the application area, and thus indicate the weight which should be attached to their preservation. This evaluation must be undertaken in line with the Chartered Institute for Archaeologists standards and guidance for archaeological evaluation including the submission and agreement of a suitable written scheme of investigation.</p> <p>The western boundary of the site is the Portway, a prehistoric trackway and Roman road, and Aves Ditch lies 130m east of the site, another prehistoric roadway therefore there is potential for roadside activity on the site. There are no archaeological features recorded within the site, though there are a number in the land parcel to the west and so there is a moderate level of potential of remains being encountered on the site.</p> <p>The south eastern part of the site lies immediately west of Aves Ditch, which is a prehistoric trackway. There are a number of features associated with the trackway including two banjo enclosures on the eastern side, adjacent to the proposal site.</p> <p>In accordance with the National Planning Policy Framework (NPPF 2021) paragraph 194, we would therefore recommend that, prior to the determination of any application on the western and south eastern part of the site, the applicant should be responsible for the implementation of an archaeological field evaluation.</p> <p>This must be carried out by a professionally qualified archaeological organisation and should aim to define the character and extent of the archaeological remains within the application area, and thus indicate the weight which should be attached to their preservation. This evaluation must be undertaken in line with the Chartered Institute for Archaeologists standards and guidance for archaeological evaluation including the submission and agreement of a suitable written scheme of investigation.</p>
<p>Healthy Place Shaping</p>	<p>The public health team has undertaken a review of both the Local Plan and its policies and the Health and Equity Impact Assessment that is provided as supporting evidence.</p> <p>Cherwell Reg 18 Local Plan and Proposed Policies</p> <p>We welcome that the Draft Local Plan recognises the importance of planning policy on health and that it has as a key theme Building Healthy and Sustainable Communities with relevant SOs 10-14. In particular, it is helpful that:</p> <ul style="list-style-type: none"> • the Plan identifies that it aims to reduce inequalities in health, along with poverty, social inclusion and supporting wellbeing and this is reflected in CP 50: Creating Healthy Communities. • the spatial strategy ensuring that new development improves well-being wherever possible through design, accessibility, social interaction, the provision of amenities and facilities and opportunities for active travel and recreation. <p>We support the other two key strategic themes of:</p> <ul style="list-style-type: none"> - meeting the challenge of climate change and ensuring sustainable development. - maintaining and developing a sustainable local economy. But we would recommend that the importance of it being a sustainable and inclusive economy is included in this key theme.

Policies

We support the range of policies that seek to deliver these strategic objectives, in particular welcoming:

- CP 46 Achieving well designed places with its reference to 20 minute neighbourhoods
- CP47 Active Travel – walking and cycling
- CP 49 on health facilities
- The wording of CP50 Creating Healthy Communities with its requirement for Health Impact Assessments

- CP36 Affordable Housing, with its focus on the provision of social rented dwellings as a proportion of affordable homes,
- DP5 on hot food takeaways

We welcome that the policy language is very clear and explicit (only 6 policies use the term 'where appropriate')

We have identified several policies where we would like the policy wording to be amended:

Core Policy 1: Mitigating and Adapting to Climate Change – Need to reference the importance of retrofit when refurbishing existing buildings.

Core Policy 12: Biodiversity Net Gain – Given the benefits of nature rich green spaces to mental health, we would recommend a target of 20% BNG.

Core Policy 16: Air Quality – Need to reference the importance of addressing indoor air quality, in particular ensuring that any refurbishments or new builds provide adequate ventilation.

Development Policy 5: Hot Food Takeaway

'i. Would not result in significant harm to the amenity or health of local residents, or highway safety;'

Suggest ii is made measurable e.g. no more than 5% of premises are hot food takeaways or not more than 2 next door to each other with at least 3 different shops in between.

iii – a 5 minute walk is subjective and a precise distance is more helpful e.g. 400m.

"iii. The proposal is not located within a five-minute walk of a school or playground, unless within an established local shopping centre.

Deletion will enable licensing to object to applications to add further hot food takeaways in existing local centres.

Request new text:

'iv: Cherwell District Council has geographical areas with long term significantly higher levels of excess weight in children. In these areas new hot food takeaways will not be permitted. Currently these areas are: Banbury Ruscote, Banbury Nethrop, Banbury, Calthorpe, Grimsbury, Caversfield, Ambrosden and Fringford, Begbroke, Yarnton and Water Eaton.'

	<p>Policy Gaps</p> <p>We have identified that there are no policies which address the following:</p> <ul style="list-style-type: none"> • Nothing relating to stewardship. • Nothing states that development with unacceptable health impacts will not be permitted. • No policy re viability appraisals and how transparent they are required to be. This could be included in CP51. • No requirement that developers undertake post occupancy monitoring and evaluation re health outcomes or HPS measures. • No policy supporting community development on strategic sites. <p>Evidence Gaps:</p> <p>Currently there is no reference to national standards that support delivery of healthy urban design and the creation of healthy communities. We would expect the following to be referenced (linked to CP46):</p> <ul style="list-style-type: none"> • Building for a Healthy Life • Building Research Establishment Environment Assessment Method (BREEAM) • Lifetime Homes standard • Building with Nature • Natural England Green Infrastructure Standards • Sport England Active Design Guide <p>Health Impact Assessment</p> <p>This is a comprehensive and robust health and equity impact assessment of the Local Plan and its policies. Policies have been assessed against a comprehensive list of determinants of health, with the positive, negative, neutral and mixed impacts identified with relevant mitigation actions identified. We particularly welcome the summary table showing the impact of different policies and we support the key actions identified as a result of the assessment and its conclusions.</p> <p>We have the following comments:</p> <ul style="list-style-type: none"> • The mitigations and actions proposed for various proposals as well as the key actions in the conclusion are helpful. How will these be addressed as the plan process proceeds? • In a future draft of the Local Plan it would be helpful to reference the new Health and Wellbeing Strategy for Oxfordshire which will be published in December 2023.
<p>Biodiversity</p>	<p>Local Nature Recovery Strategy</p> <p>We note reference to the draft Nature Recovery Network in relation to policies CP11, 12 13, and 15; the Thames Valley Environmental Records Centre have recently completed a piece of work commissioned by all the Districts, City and OCC to produce the Interim Oxfordshire Nature Recovery Network 2023. It is intended that this mapping can help inform development of Local Plan policies across the County by identifying zones for nature recovery. References to the draft NRN should therefore be updated accordingly.</p> <p>However, policy should be clear that the Interim NRN will be succeeded by the Oxfordshire Local Nature Recovery Strategy (LNRS) once it has been published. LNRSs are a statutory requirement under the Environment Act 2021, they will be</p>

	<p>spatial strategies that establish priorities and map proposals for specific actions to drive nature’s recovery and provide wider environmental benefits.</p> <p>OCC are Responsible Authority for production of the Oxfordshire LNRS and we are engaging widely with relevant groups across the County as we develop the strategy; it is anticipated that the LNRS will be published in 2025.</p> <p>CP10: Protection of the Oxford Meadows SAC consideration should be given to seeking to improve water quality and the hydrological regime of the SAC, rather than just maintain its current state.</p> <p>CP11: Protection and Enhancement of Biodiversity wording relating to irreplaceable habitats should be reviewed against NPPF 180 (c) which requires wholly exceptional reasons and a compensation strategy to be identified if these habitats are to be impacted.</p> <p>CP12: Biodiversity Net Gain The policy text should be updated to reflect that the version of the Defra metric to support mandatory BNG will be metric 4.1.</p> <p>We note that this policy seeks 20% BNG only within the NRN and on new urban extensions. We encourage wider adoption of policy for >10% BNG; all Oxfordshire LPAs signed up to the OxCam Environment Principles, which agreed to a 20% BNG requirement. OCC have committed to deliver >10% BNG with an ambition to achieve 20% for our own planning applications (Climate and Natural Environment Policy Statement). The Oxfordshire Local Nature Partnership are compiling information to help support development of >10% BNG policy, as well a set of Oxfordshire BNG Principles which it could be useful to reference.</p> <p>As indicated above, an Interim Nature Recovery Network 2023 has been produced to support Local Plan production and this should be referenced rather than the draft Nature Recovery Network. However, it should also be made clear that this is an interim document which will be superseded by the Local Nature Recovery Strategy when it is published in early 2025. It is advised that the policy wording is revised accordingly, and to reference future use of the LNRS to focus off-site BNG delivery.</p>
<p>Landscape/ Green Infrastructure</p>	<p>We support strategic objectives SO4, SO9, SO12, SO13, SO14.</p> <p><u>Spatial Strategy</u> It is welcomed that the spatial strategy for the District seeks to raise design standards, improve the attractiveness of our towns and villages and improve the well-being for people through provision of amenities including for recreation. It is recommended that the District’s ambitions on conservation and enhancement of the natural environment and Green and Blue Infrastructure (GI) are also mentioned here.</p> <p>It is recommended that the creation of green and blue infrastructure should be ambitious and at a scale that reflects the scale of new developments in and around expanding towns and settlements.</p> <p><u>Core Policy 6: Renewable energy</u> Large solar farms have the potential to adversely affect the landscape character and views, and cumulatively result in a change in landscape character of the wider area. This applies not only to landscape designations but all landscapes and landscape in</p>

general terms. Impacts on landscape and views should therefore be a key consideration when assessing these sites.

This policy is supported overall but it is recommended that the wording is strengthened with regard to landscape designations, and visual impacts on local landscapes. We recommend that the need to avoid adverse impacts on the natural beauty of the Cotswolds National Landscape and its setting are specifically mentioned. This could be supported by links to the CNLs management plan and position statements.

It might be covered elsewhere but consideration should be given to the use of roofs (especially large roofs of warehouses, commercial buildings and offices) for solar energy in preference to agricultural land.

Core Policy 14: Natural Capital and Ecosystem Services

I welcome the inclusion of this policy but recommend that a definition on 'environmental net gain' and further detail on requirements are provided in the supporting text.

Core Policy 15: Green and Blue Infrastructure

The policy on Green and Blue Infrastructure policy is strongly supported, and the preparation of the Cherwell Green and Blue Infrastructure Strategy very much welcomed.

I recommend that references to both the Natural England's Green Infrastructure Standards and the Cherwell's Green and Blue Infrastructure Strategy are made in the policy to guide green infrastructure in new developments.

Consideration should also be given to whether the policy should require or encourage the use of Building with Nature benchmark for larger developments ([Building with Nature](#)) to assist with the creation of high-quality green and blue infrastructure in developments.

The multi-functionality of green infrastructure is recognised and supported; however, care will have to be taken that uses are compatible with each other, or appropriate zoning is applied. For example, areas important for nature conservation might need to be kept separate and buffered from areas of activity (eg recreational areas, new residential areas) if they support habitats and species that are sensitive to disturbance.

Green infrastructure works on a variety of scales, and I recommend that this policy does not only focus on strategic GBI but also encourages the integration of green infrastructure at a smaller scale such as green roofs and walls, rain gardens, tree planting or SUDS etc.

With regard to tree and woodland planting it should be less about the number of trees planted but the quality of trees. Tree planting should follow the principle of 'the right tree in the right place' and should also include the ongoing management of trees, so that they can fulfil their full potential. This requires developments to allow sufficient space for large tree planting in the right locations.

I strongly support that the policy seeks information and clarity of how GBI will be maintained and managed post development. While measures that fall under the BNG regulations will have 30 years management many other existing and new

green infrastructure assets lack commitments for long-term management. The long-term management and monitoring of GBI is considered essential to ensure that long-term benefits are being achieved.

Core Policy 18: Light Pollution

The inclusion of a policy on light pollution is welcomed but the wording leaves a lot of room for interpretation. To ensure the effectiveness of this policy it is recommended that the policy states specific requirements and/or provides further detail in the policy or the supporting text of how light pollution can be minimised through sensitive design. For example the ILP lighting guide offers guidance on lighting [ILP Guidance Note 1: the reduction of obtrusive light has been updated | Institution of Lighting Professionals \(theilp.org.uk\)](#). Further information can also be found in other Local Plan documents or AONB management plans including the Cotswolds National Landscape Management Plan and position statement.

It should be noted that OCC are in the process of replacing their street lights with LEDs of maximum 3000K (Kelvin), which is considered as 'warm white' light as this is less harmful to wildlife and the local amenity.

Consideration should be given whether this policy could be expanded to also address impacts on tranquillity, or whether a specific policy on tranquillity should be included in the plan.

Core Policy 43: Protection and Enhancement of the Landscape

This policy is welcomed and supported. The Cotswolds National Landscape (CNL) Management Plans should form part of the evidence base of the Local Plan and be a material consideration in determining planning applications within the CNL and its setting. I recommend that further detail is provided on how some of the aspects listed in the second paragraph of the of the policy are proposed to be assessed.

Core Policy 46: Achieving well-designed places

This policy is very much welcomed and supported. GBI in all its forms should be an integral part of developments. As mentioned under the GBI policy the Building with Nature benchmark and accreditation ([Building with Nature](#)) could assist with this.

Development should ensure that tree planting within developments follows the principle of the 'right tree in the right place' and allows sufficient space for large tree planting and ongoing management of trees. Fewer larger trees that can reach their full potential deliver greater environmental and visual benefits and are preferable to planting a large number of smaller trees.

Area-specific policies

I strongly support the core policies 66 (Banbury), 73 (Bicester) and 80 (Kidlington), which seek to deliver green, blue and other strategic infrastructure to the main urban centres in the District. I consider it important that the level of GBI provision matches the scale and impact of the proposed level of development. For example, the level of development growth around Bicester should be matched by similarly ambitious strategic GBI provision such as the creation of a and urban edge park around Bicester.

Appendix 2:

The consideration of green and blue infrastructure in the proposed development areas is welcomed. I have the following general observations:

- Care will need to be taken when allocating site on the edge of settlements or in the countryside as they have the potential to cause significant adverse impacts in landscape and visual terms. It is important that proposed allocations are adequately assessed and informed by landscape and visual appraisals.
- Landscape and green infrastructure treatments should be informed by the relevant local landscape character guidelines and the Green and Blue Infrastructure Strategy to aid the integration of sites in the landscape context. The correct design and treatment of the interfaces between the built-up areas and the countryside are particularly important.
- The terminology of GBI elements (legend) should be precise and include definitions of what is proposed to avoid misunderstandings. For example, the green and blue infrastructure plan in LPR52 includes 'Lowland Meadow', however, lowland meadow is a particular species-rich habitat in biodiversity terms, which might not be meant here. SUDS could also comprise a variety of treatments and would therefore benefit from further detail.
- Indicative GBI maps should define 'accessible green space' as according to aerial photographs some of the spaces don't seem to comprise agricultural fields.
- Landscape and green infrastructure treatments should be chosen that are in keeping with the local landscape character and can realistically be achieved in the context of development.
- As mentioned above developments should ensure that tree planting follows the principle of the 'right tree in the right place' and allows sufficient space (above and below ground) and ongoing management trees. Fewer larger trees that can reach their full potential deliver greater environmental and visual benefits and are preferable to planting a large number of smaller trees.
- All PRoW connections should not only provide an active travel link but be accompanied by green infrastructure that is characteristic for the area such as trees, hedgerows or generous grass verges to provide high-quality connections that are also good for wildlife connectivity.
- Site allocations near Oxford and Bicester should consider potential impacts and opportunities on the 'Bernwood Forest and Ray Valley Living Landscape' project. This landscape-scale project led by the Berks Bucks Oxon Wildlife Trust (BBOWT) in partnership with others seeks to assist nature recovery in the area between Oxford, Bicester and Aylesbury. Some of the proposed allocations (eg LPR21A South East of Wretchwick Green- site A) are located in this area. It is strongly recommended that CDC consult BBOWT on the Local Plan proposals with a view that proposed site allocations can positively connect and contribute to this project.

LPR52 North of Wykham Lane

- The strategic GBI looks rather limited for a development of this size.

LPR21A South East of Wretchwick Green - site A

- The GBI map only covers the proposed housing allocation but not the employment allocation. GBI should be considered comprehensively for LPR21A and B (Land adjacent to symmetry Park)
- The site does not seem to provide sufficient strategic GBI for a development of this size. The LWS will need remain open but is also unlikely to be able to act as open space without compromising its designation.
- The site is located in the 'Bernwood Forest and Ray Valley Living Landscape' project area, a landscape-scale nature recovery project led by the local wildlife trust (BBOWT). Site briefs should be drawn up in liaison with BBOWT.

	<p>LPR33: North-West Bicester</p> <ul style="list-style-type: none"> • An allocation of this size should be accompanied by ambitious green infrastructure and open spaces that match the scale of this allocation, such as a park around the outskirts of Bicester. Such a proposal would need to be reflected in the LP. • The development area comes close to Bucknell potentially causing issues of coalescence. <p>LPR37a Land South of Chesterton and North West of A41</p> <ul style="list-style-type: none"> • The development area will result in a coalescence of Chesterton and Little Chesterton, which has the potential to fundamentally change the character of these villages • The GBI map only covers the proposed housing allocation but not the employment allocation. Employment uses can also offer GBI benefits eg through the provision of green roofs and walls, green links or open spaces, and should also be included in the GBI mapping. GBI should be considered comprehensively for LPR37 A and LPR38 (Land East of M40 J9 and South of Green Lane) • The 'strategic green space in this allocation looks rather small for a development of this size.
<p>Waste Management</p>	<p>Reference to the circular economy and waste minimisation in Core policy 1, Development Policy 1, and Core Policy 26 is supported. We would further support this becoming a theme throughout.</p> <p>We would encourage expectations around the Circular Economy to be specifically referenced in the statement in Core Policy 26.</p>
<p>Minerals and Waste Policy</p>	<p>The CDC draft local plan (Reg 18) consultation sets out indicative site development templates where key constraints and opportunities are identified for each site. Since reviewing all the sites suggested, the Minerals and Waste team have the following comments to make:</p> <p><u>Saved Allocations</u></p> <p>Both LPR55 Canalside and LPR56 Higham Way are allocations that were previously saved policies (Banbury 1 and Banbury 19 respectively). These are being replaced/alterd therefore minerals and waste have the following comments:</p> <p>LPR55 Canalside – The proposed allocation is for a mix of both housing and employment. We recommend that any policies that come forward on this site that specify specific use classes do not preclude waste facilities (sui generis). This would allow compatible waste sites to come forward on this land.</p> <p>LPR56 Higham Way – The proposed allocation is in close proximity to several safeguarded waste sites (within 100m of the proposal). It is on a site safeguarded in the Minerals and Waste Local Plan Part 1 – Core Strategy as a waste facility. However, since the adoption of the Core Strategy there has been a replacement site permitted with a legal agreement to close the waste facility on this site. We recommend that any policies that come forward on this site that specify specific use classes do not preclude waste facilities (sui generis). This would allow compatible waste sites to come forward on this land.</p>

Waste

LPR21A South-East of Wretchwick Green – Site A – Oxfordshire County Council as Minerals and Waste Planning Authority object to this site being allocated. The red line for this allocation is directly next to a safeguarded waste site. The allocation proposed would directly affect the waste management facility which is safeguarded under policy W11 of the Oxfordshire Minerals and Waste Local Plan – Part 1 Core Strategy (OMWCS). Policy W11 states:

Proposals for development that would directly or indirectly prevent or prejudice the use of a site safeguarded for waste management will not be permitted unless:

- *the development is in accordance with a site allocation for development in an adopted local plan or neighbourhood plan; or*
- *equivalent waste management capacity can be appropriately and sustainably provided elsewhere; or*
- *it can be demonstrated that the site is no longer required for waste management*

Due to the first criteria of W11, it is important for the district to consider the waste implications at the earliest stage. If this allocation is to be brought forward, potential mitigation measures that should be included in a site specific policies, are:

- *developers are required to demonstrate equivalent waste management capacity can be appropriately and sustainably provided elsewhere; or*
- *it can be demonstrated that the site is no longer required for waste management*

LPR21B Land Adjacent to Symmetry Park, North of A41– CDC has identified this land for employment use, specifically for use classes E(g)(i)(ii)(iii)/B2/B8 floorspace. We recommend that any policies that come forward on this site that specify specific use classes do not preclude waste facilities (sui generis). This would allow compatible waste sites to come forward on this land.

Minerals

LPR42 South of Heyford Park – The Minerals and Waste team object to this site being allocated. The site lies in a crushed rock Safeguarding Area. The proposed allocation would prevent this mineral to be worked in the future and is safeguarded under policy M8 of the Oxfordshire Minerals and Waste Local Plan – Part 1 Core Strategy (OMWCS). Policy M8 states:

Mineral resources in the Mineral Safeguarding Areas shown on the Policies Map are safeguarded for possible future use. Development that would prevent or otherwise hinder the possible future working of the mineral will not be permitted unless it can be shown that:

- *The site has been allocated for development in an adopted local plan or neighbourhood plan; or*
- *The need for the development outweighs the economic and sustainability considerations relating to the mineral resource; or*
- *The mineral will be extracted prior to the development taking place.*

Due to the first criteria of M8, it is important for the district to consider the mineral implications at the earliest stage. Potential mitigation measures that should be included in a site specific policies, if this allocation is to be brought forward, are:

- *The mineral will be extracted prior to the development taking place.*

<p>Climate Action</p>	<p>The focus of the draft Cherwell Local Plan is centred on addressing climate change, health and well-being, achieving a sustainable economy and building healthy and sustainable communities, which are well aligned to the County Council’s environmental principles. We welcome the broad thrust of the plan, especially the ambitious net zero requirements.</p> <p>We welcome Cherwell’s intention to put climate change at the very heart of the draft plan and its ambition to become net-zero carbon by 2030, in line with the Cherwell Climate Framework. The Local Plan should also draw from the ambitions and targets from PAZCO and the Oxfordshire Net Zero Roadmap and Action Plan.</p> <p>We also strongly support the high-level themes which underpin the Local Plan and welcome the recognition of the role of the circular economy will play in delivering the strategic objectives of the vision. Circular economy principles have been embedded into the strategic and non-strategic policies that inform the Local Plan (e.g. waste efficiency and management in new development). However, there are some policy gaps in relation to retrofit and the reuse/refurbishment of vacant/underused buildings (e.g. school sites).</p> <p>We broadly support the emerging vision and strategic objectives of the plan subject to minor changes to align them more closely with Oxfordshire net zero aspirations and the spatial direction of the district. The spatial strategy should also more clearly articulate the scale, pattern and location of new development, including the role and hierarchy of settlements, in line with best practice.</p> <p>Cherwell’s themed-based policies (as set out in chapters 4-8) are considered to be robust and well evidenced, using up-to-date baseline information, although there is scope to streamline the content, distinguish between supporting text and policy statements and reduce the number of policies. We are particularly pleased that recognition is given to the importance of mitigating and adapting to the impacts of climate change throughout the document.</p> <p>We think the suite of policies that specifically relate to net zero development and energy systems represent examples of best practice and are very much aligned with the priorities of the county council as set out in the Climate Action Framework and in the PAZCO report.</p> <p>We support the promotion of 20-minute neighbourhoods and the principles of health place making across the district. Cherwell sets out a commitment to work with local people, organisations and schools etc to engage them in the planning of new places, facilities and services (e.g. social care and green infrastructure) through ‘community activation (see paragraph 3.285). In line with this aspiration, the Local Plan should more clearly articulate how developers will be expected to engage with the local community and other stakeholders in the development of new schemes. For instance, major urban extensions and other strategic developments (e.g. eco towns) should be expected to demonstrate “<i>strong vision, leadership and community engagement</i>” and encourage “<i>community ownership of land and long-term stewardship of assets</i>” in line with the garden villages/town principles of the Town and Country Planning Association (TCPA).</p> <p>Vision</p> <p>It would be useful to provide more clarity on what Cherwell’s climate action targets are and how future spatial planning decisions will contribute towards net zero.</p>

Achieving a net zero Cherwell should be mentioned as an overriding priority of the overall vision.

The vision should clearly set out the general location of the proposed eco-towns. For instance, the Local Plan proposes to bring forward a series of green and eco-friendly communities/eco towns on the edge of Bicester and Banbury that will be exemplars of sustainable living and working with affordable homes and good access to resource efficient infrastructure (e.g. local energy systems), employment and services, in line with Bioregional's One Planet Living agenda.

We welcome the long-term aspiration of creating a "*choice of well-designed market and affordable homes...that are sustainable, healthy, vibrant and cohesive communities*". This statement should also reflect the aspirations of net zero carbon development (including the retrofitting of existing homes) set out in the PAZCO report. We suggest amending the policy to say that homes will also be net zero using 100% renewable energy sources. In addition, a significant proportion of existing homes will have been retrofitted with energy saving measures to reduce emissions (a key priority of the Oxfordshire Net Zero Roadmap and Action Plan).

Sustainable energy production will accelerate the transition to net zero. This transition will involve shifting from fossil fuels to a decentralised local energy system, focussed on maximising clean and renewable electricity production (as highlighted through the Project LEO) within close proximity of homes and businesses. The vision should go into more detail on what this transition will look like. We suggest amending the policy to say that homes will also be net zero using 100% renewable energy sources. In addition, a significant proportion of existing homes will have been retrofitted with energy saving measures to reduce emissions (a key priority of the Oxfordshire Net Zero Roadmap and Action Plan).

Sustainable energy production will accelerate the transition to net zero. This transition will involve shifting from fossil fuels to a decentralised local energy system, focussed on maximising clean and renewable electricity production (as highlighted through the Project LEO) within close proximity of homes and businesses. The vision should go into more detail on what this transition will look like. The policy should be amended to make it clear that sustainable energy production will be based on a state-of-the-art local energy system that connects developments and decentralised low carbon infrastructure to help achieve our decarbonisation goals (in accordance with the Oxfordshire Net Zero Roadmap and Action Plan).

We would like to understand how Cherwell's natural environment will become more diverse and suggest the Local Plan describes what the natural environment will look like in 2040. For example, will protected areas be in good condition and better connected? Will more wildlife sites be planned?

Strategic Objectives

SO3 reads like two separate objectives which have been combined, although it is not clear how improving air quality is specifically linked to biodiversity net gain and the enhancement of natural capital.

Climate Vulnerability Assessment

As part of Oxfordshire County Council's increased focus on the need for Oxfordshire to develop long-term resilience to a changing climate, the county council has been working with Oxfordshire stakeholders to develop a climate vulnerability assessment, which looks to identify key climate vulnerabilities for Oxfordshire across

	<p>a broad range of key thematic areas. The climate vulnerability assessment will serve as an evidence base to identify priority adaptation and resilience actions that need to be implemented and will inform the development of an Oxfordshire Climate Adaptation and Resilience Strategy as well as a range of other policies and plans. The vulnerability assessment can support the Cherwell Local Plan by identifying key locations across Cherwell that are particularly vulnerable to flooding and heatwaves, taking into account key variables such as locations of vulnerable population groups, access to greenspace and the urban heat island effect. We hope to publish the finalised report over the coming months with agreement with district councils and local stakeholders.</p> <p>Local Area Energy Plans</p> <p>The future decarbonisation and electrification of transport and heating places considerable demands on national and regional energy infrastructure, and at the same time local authorities are pushing to meet Net Zero targets. Local Area Energy Planning (LAEP) is a data-driven and whole energy system, evidence-based approach that sets out to identify the most effective route for the local area to contribute towards meeting the national net zero target, as well as meeting its local Net Zero target. All the local authorities in Oxfordshire are working together to produce Local Area Energy Plans (LAEPs) over the coming years. LAEPs identify potential actions and projects from a range of technologies and scenarios. This information is key to stakeholders being able to identify the most cost-effective preferred plan for how energy can be generated, distributed, stored, traded and used to enable a local area to reach its Net Zero target. It would therefore be helpful if the Plan made reference to future LAEPs.</p> <p>Please see Annex 2 for further detailed climate action suggestions on the draft Strategic Policies.</p>
<p>Innovation</p>	<p>Please note - comments have generally been made where a topic is first presented in the plan, albeit sometimes also applicable to later sections.</p> <p>QUESTION 1: Do you have a view on the Plan period?</p> <p>In the last 20 years we have seen how the personal computer, internet and smart phone have changed the way we communicate, where we work and how we shop. In the next 20 years we could see fundamental changes with, for example, driverless vehicles, unmanned passenger drones (air taxis) and artificial intelligence changing the nature of work for many. The timescale of this plan is such that flexibility is required; whilst we may predict some innovations, the timing and take-up is not certain and unexpected, disruptive innovation also happens. Oxfordshire County Council innovation service has produced an Innovation Framework innovation framework (oxfordshire.gov.uk) which sets out a series of principles to be applied to the integration of innovation into new development and infrastructure so that innovation is used to further policies, strategies and long-term plans. Oxfordshire County Council (OCC) would like to see the Innovation Framework referenced in this local plan, and for there to be an expectation that innovation should be considered by developers. This can be addressed in the form of Innovation Plans (as referenced in the framework) being developed.</p> <p>QUESTION 5: Do you have any observations on our objectives?</p> <p>SO1: Promote net-zero carbon new developments, with high sustainable</p>

construction standards, and low embodied carbon to ensure new developments deliver the highest viable energy efficiency, including the use of decentralised energy...

Understandably risk averse, the construction industry may however be embracing low or no-carbon concrete by the time developments in this plan come to fruition, in the way that low temperature asphalt is accepted today. Consideration could also be given to using timber in construction; as well as having low embedded carbon, further carbon reductions can be made through its lower weight requiring less substantial foundations (of concrete), making it particularly useful on difficult ground. Wood is of course recyclable and reusable. Wooden buildings have also been found to improve the wellbeing of occupants. (Ref Theme 1, Core policy, 3.13)

The electrification of heating using heat pumps may be more effective as a small district heating system for a development or multi-story building as has been demonstrated in shared ground source heat pump installations such as [Geothermal Heating & Cooling Solutions from Celsius Energy](#). In these designs, multiple bore holes terminate in a single manifold, saving on space, disruption and cost. They can also be used to provide cooling in the summer – an important consideration for climate change. (Ref core policy 1, 3.3)

SO3: Maintain and improve the natural and built environment including biodiversity, landscape, green infrastructure...

The use of green walls and hedges in developments can help improve the built environment including biodiversity as well as capture pollution. (Ref core policy 1, ix)

SO5: Prioritise active travel (AT)... connectivity and accessibility to services...

SO11: ...healthy behaviours...safety...

Research has shown that it is often changes in life events (such as relocating to a new development and starting a new school) that provides the catalyst to changing habits – such as the take up of cycling and other AT. Consideration should therefore be given to ensuring a good quality of provision for AT is in place in the early stages of occupancy of a development, including addressing actual and perceived safety with for example, cycle paths wide enough to two cycles to pass and segregation from vehicles wherever possible. Facilities for secure cycle parking near to other modes of transport and parking for larger cargo carrying cycles should also be considered.

It is anticipated that early adoption of Connected and Automated Vehicles (CAVs) may be provided by small but shared, on-demand services. Consideration could therefore be given to providing the flexibility to convert space in developments originally for communal parking of private vehicles, to that for waiting and turning of CAVs. These CAVs will be electric, therefore installing the backbone of appropriate capacity charging infrastructure within a flexible parking space should also be a consideration.

QUESTION 6:

Do you have any comments on our strategy?

Rural areas.

The use of connected and autonomous vehicles (CAVs – or driverless vehicles) may open up new options for transport making it cost effective to obtain shared vehicles

on-demand and so improving accessibility for less densely populated areas where previously a private car may have been the main solution to accessibility. CAVs could contribute to providing a 'lifetime' solution for non-drivers like the young and elderly (Ref. SO 10).

DISTRICT WIDE POLICIES

Core Policy 1: Mitigating and Adapting to Climate Change

3.5 Electric and active travel to become the new norm.

If electric travel is to become the new norm then sufficient access to charging is essential. Charging provision should be in line with the Oxfordshire Electric Vehicle Infrastructure Strategy (OEVIS). The OCC innovation service has partnered with Oxford Direct Services in developing an in-pavement charging cable solution. GUL-e is a very simple way of charging from the domestic supply, in situations where householders do not have their own driveways. The OCC innovation service is also currently partnering in a project to demonstrate a much more reliable solution for commercial charging provision, which may be used in Park and Ride carparks in the county.

Core Policy 2: Zero or Low Carbon Energy Sources

3.14 We will expect developers to consider all available zero or low-carbon energy sources so that the energy used in development causes the minimum possible carbon emissions. Options could include.... large-scale sources of energy/heat such as a direct connection to low carbon heat networks

Centralised, small scale district heating sources of heating/cooling could include ground source heat pumps mentioned in our comments on SO1. It might be possible to retrofit this to existing centralised solutions as centralised systems have the advantage of being easier to change the energy source because the 'heat exchanger' remains unchanged within the multiple dwellings.

Core Policy 4: Achieving Net Zero Carbon Development

3.22 d Proposals to further reduce carbon emissions by maximising opportunities to produce and use renewable energy on-site.

Energy storage is an important consideration in local and larger renewable energy schemes. Cost effective, long duration battery storage is in development and could help in a number of ways including:

- Providing 24hr power for local generation schemes
- Reinforcing the grid where there are local power inadequacies, which may otherwise influence the size or location of a particular development if in one of these areas.
- Load levelling of power to and from the grid and so reducing the commercial cost of power for residents.

Core Policy 16 and 17: Air Quality, Pollution and Noise

Successful control of air quality, pollution and noise requires persistent measurement over time. Consideration should be given to the permanent location and mounting of sensors – this might mean the use of 'smart' lamp posts to support and provide the power for, not only air quality and noise measurement, but also

- Automatic proximity control of lighting to reduce light pollution.

- Counting pedestrians, cycles and vehicles to understand the transition to active travel.
- 5G, and in the future 6G mobile data transmitters that will be necessary, for example, for CAVs and other vehicle information systems, as well as an alternative connectivity solution for residents and businesses. These will need to be more densely located than 4G, but the same infrastructure will be compatible between 5G and 6G (small cell).
- Electric vehicle charging.

With reference to noise measurement, the Innovation Service and partners have experience in proving low-cost sound sensors that record not only the volume of sound but also the quality: I.e., whether man-made or made by nature, so that the impact on the natural sound scape can be understood.

Core Policy 22: Assessing Transport Impact/Decide and Provide

The measurement of a baseline and the take up of active travel and the use of road vehicles will need to be understood. The Innovation Service have experience of installing, operating and using data from camera sensors that use machine learning and AI to count pedestrians, cyclists, e-scooters and multiple classes of road vehicles. Solutions have become smaller and cheaper with the latest from Telraam offering a ‘citizen science’ solution with installation behind a windowpane and data from users shared on a public website.

Core Policy 23: Freight

Increasingly, freight distribution is incorporating micro-consolidation logistic hubs and it is expected that these will be an increasingly important part of delivering goods within cities and large towns. Traditional freight vehicles would off-load at a micro-distribution centre and the so called ‘last mile’ (or two or three) completed by electrically assisted pedal powered cargo cycles. Provision for these distribution centres and connected cycle routes should be considered as they take vehicles off congested streets and enable a faster, cost effective delivery service in these circumstances. Potential for these hubs to be used also by drones in the future should also be considered, in terms of the potential for docking locations to be added.

Core policy 50: Creating Healthy Communities

There are a number of ways innovation may contribute to healthy communities:

- Digital connectivity including provision for 5G and later mobile data networks will help to facilitate the use of monitoring for carbon monoxide and carbon dioxide inside buildings to alert for health issues.
- Medication may be delivered by drones, so provision should be considered for less intrusive flight paths and landing zones. These could be designed into a new development.
- Using timber as a construction material can create housing and spaces that promote mental wellbeing.
- CAVs might provide greater access to medical services for the less mobile.
- Measurement of AT take-up and vehicle usage using machine learning cameras will help design better AT solutions and fine tune their operation and effectiveness.

	<p>Core Policy 77: London Oxford Airport</p> <p>Innovations now in development include the use of electrical vertical take-off and landing (eVTOL) aircraft for personal transport (air taxis). There are still considerable regulatory hurdles and cost of travel issues to be overcome so this is a mid to long term innovation. However, consideration of noise and the location of passenger handling and landing/take-off at 'verti-ports' should perhaps be undertaken in this plan; perhaps the existing airfields of London Oxford and Bicester Aerodrome might be possible sites, as they are relatively close to centres of population.</p>
<p>OxLEP</p>	<p>Cherwell District's draft Local Plan 2040 contains a Core Community Employment Plan policy (Core Policy 29) as outlined below:</p> <p><i>Core Policy 29: Community Employment Plans</i></p> <p><i>Proposals for major development should demonstrate how opportunities for local employment, apprenticeships, and training would be created, and seek to maximise the opportunities for sourcing local produce, suppliers and services, during both construction and operation.</i></p> <p><i>The Council will require the submission of a site-specific Community Employment Plan (CEP) for the construction and operation of significant* development sites, using a planning condition or legal agreement. The CEP should be prepared in partnership with the District Council and any other partners to deliver the agreed CEP.</i></p> <p><i>The CEP should cover, but not be limited to:</i></p> <ul style="list-style-type: none"> <i>i. Local procurement agreements;</i> <i>ii. Apprenticeships, employment and training initiatives for all ages and abilities, and</i> <i>iii. training and work experience for younger people including those not in education, employment, or training.</i> <p><i>*Significant' is defined in the context of this policy as sites over 1,000 dwellings or 4,000m² of employment floorspace (Classes E(g), B2 and B8).</i></p> <p>We support the inclusion of this policy within the plan although would suggest including uses C1 and C2 (hotels and care homes). The hospitality and care sectors suffer acute labour shortages within Oxfordshire and employment plans can support these sectors to develop a local skilled workforce, where new development proposals are coming through the planning system.</p> <p>Core Policy 29 applies to sites with 1000 dwellings which includes the following indicative strategic sites identified within appendix 2:</p> <p>LPR33: North-West Bicester LPR42: South of Heyford Park</p> <p>However, there are large indicative strategic sites for housing allocation which fall below these thresholds including:</p> <p>LPR21A: South-East of Wretchwick Green – Site A (South East Bicester) LPR37A: South of Chesterton and North-West of A41 (Chesterton)</p>

	<p>These sites are located within proximity of areas which are identified with high levels of education, skills and training deprivation. Across Banbury and Bicester there are 19 LSOAs within the top 20% most deprived areas for Education, Skills and Training (Index of Multiple Deprivation 2019). Opportunity exists for the above strategic sites to implement community employment plans to support employment and skills outcomes for local communities in these areas. We would recommend inclusion of a Community Employment Plan policy for these indicative sites, which fall below the thresholds identified in Core Policy 29, due to their size and proximity to areas with higher indicators of employment, skills and training deprivation.</p>
<p>Plan Preparation Comments</p>	<p>Plan Period The Cherwell Local Plan must look ahead over a minimum 15-year period from adoption (in line with paragraph 22 of the National Planning Policy Framework) to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. Given the slippage to the timetable and the uncertainty over the length of the examination process, CDC may wish to consider extending the end date of the plan period to 2041 or beyond. An extended period could also allow some flexibility in the plan preparation programme in the event of further slippage given the extent of cross boundary issues (e.g. resolving Oxford’s unmet needs) and complexity of the plan making process.</p> <p>Scope and Structure We welcome the concise wording and condensed number of themes. It may be however that there are too many individual policies (87 core policies and 7 development policies), some of which may become outdated and need early revision as circumstances change (e.g. planning reforms).</p> <p>Some of the policies could be merged or combined (e.g. area based policies and other policies that overlap with each other and contain limited content) to keep the plan concise and improve navigation.</p> <p>Some of the policies include material that is more appropriate in the supporting text and vice versa.</p> <p>The plan should make greater use of spatial maps to illustrate key policies.</p> <p>In the interests of plain English, some of the technical terms in the document need to be explained. Examples include:</p> <ul style="list-style-type: none"> • SAP or SBEM calculations (core policy 2 and paragraph 3.18) in relation to energy performance; • Developer Contributions SPD; and • LAPs, LEAPs and NEAPs (paragraph 3.326) <p>Use of cross referencing, abbreviations and tenses should be reviewed to ensure a consistent approach. For instance, some policies include links to other relevant policies (e.g. Core Policy 11: Protection and Enhancement of Biodiversity and the Natural Environment and Core Policy 15: Green Infrastructure), but most do not. Where appropriate, you should add hyperlinks to where the source originated from.</p> <p>The distinction between strategic and non-strategic policies in the plan appears to be at odds with paragraph 28 of the NPPF, which states that policies relating to “<i>specific areas, neighbourhoods or types of development</i>” should be defined as non-strategic policies (development management policies). The vast majority of the area-</p>

based and district wide policies in the plan are defined as core policies (strategic). Some of the area specific policies are more akin to non-strategic DM policies (e.g. 67 and 68).

Vision to 2040

Some of the outcomes in the vision are quite generic and could be made more locally distinctive. The Plan should help the reader understand, on a strategic scale, what the area will look like, with reference to specific outcomes.

The overall vision should be more spatially orientated. As currently drafted, it is not clear where development activity will be focussed in Cherwell, other than the reference to Heyford Park. The vision should clearly set out the general location of the proposed eco towns and other key strategic growth areas and the nature of development activity taking place in these areas. Key strategic infrastructure projects that will unlock significant growth and access to services should also be identified (as outlined in the Oxfordshire Infrastructure Strategy) where appropriate.

Reference should be made to the wider context of the plan area, including the importance of links to neighbouring authorities and the wider growth corridor between Oxfordshire and Cambridgeshire, including improved east west connectivity and meeting a proportion of Oxford's unmet needs etc.

Strategic Objectives

Reference should be made in the strategic objectives to:

- key areas of landscape and historic value that will be protected and enhanced, such as AONBs (Cotswolds), Oxford Meadows SAC, local vernacular architecture and river/canal valleys (e.g. Oxford Canal);
- the development of an integrated blue and green network in line with the Cherwell Blue and Green Infrastructure Strategy, focussed on the expansion of blue and green corridors around key settlements, tied to nature recovery solutions; and
- the specific areas where growth and physical change will occur over the plan period, such as urban extensions (North West Banbury) and town centres, such as Kidlington, Banbury, Bicester and Heyworth Park.

SO8 should be more locally distinctive.

SO12: Focus development in Cherwell's sustainable locations – the most sustainable development locations should be defined/named here.

Spatial Strategy

This section should briefly explain why the preferred approach to growth is justified (as suggested in the PAS Local Plan Route Mapper) and provide clearer links between the vision, objectives and strategic policies.

There is potential confusion and overlap between the objectives of the spatial strategy and the overarching strategic objectives: some of the bullet points in the spatial strategy are quite generalised (especially those relating to the district as a whole e.g. minimise carbon emissions, achieve net gains, improve design standards, increase active travel etc) and could be more spatially orientated. The district-level objectives should be amended to reflect the scale, pattern and distribution of growth set out in the core policies.

The spatial strategy should be an overarching strategic policy in its own right – as it sets out the overall direction of travel to guide development and physical change in

Cherwell. The objectives of the spatial strategy are repeated in the area-based policies set out in chapters 4-8, The district-level objectives are not tied to a specific policy in the plan. Suggest:

- Convert the overall spatial strategy into an overarching policy with appropriate cross references
- Delete the “Overall Spatial Strategy” from chapters 4-8. These sections should specifically focus on the area-based strategies (e.g. Banbury, Bicester and Kidlington).
- It should also explain how you intend to protect and enhance the Cotswolds National Landscape Area of Outstanding Natural Beauty and Green Belt.

The spatial strategy should clearly set out how development proposals, plans and strategies will be expected to comply with the requirements set out in the spatial strategy to ensure consistency in decision-making. There is also a disconnect between the spatial strategy and the overall level and distribution of growth set out in the themed policies, centred on the main towns, local service centres and larger/smaller villages. Technically speaking, the spatial strategy should be the settlement hierarchy (as set out in core policy 37). The key diagram identifies the main towns, large and small villages in the settlement hierarchy and the key employment and housing allocations, although the relationship between the spatial strategy and the settlement hierarchy and key growth locations is not explained in the supporting text. The spatial strategy should also set out, in broad terms, where most development and investment will be focussed and what scale of development will be appropriate within identified parts of the district, including broad locations, in line with the NPPF.

The settlement hierarchy (core policy 37) and key growth locations (as defined on the key diagram) should be combined with the objectives of the overall spatial strategy to form an overarching policy (or a series of interlinked policies) in this section.

The spatial strategy should indicate how many new homes will be built within each growth area (Banbury, Bicester, Kidlington, Heyford Park etc) over the plan period (translating the figures from Core Policy 34: District Wide Housing Distribution into the spatial strategy).

The NPPF states that policies relating to large scale settlements such as West Bicester should be set within a vision that looks at least 30 years ahead (taking account of the likely timescale to delivery). The strategy should also confirm that a further 4,000 homes will be provided at North-West Bicester beyond 2040.

Strategic Policies

Core Policy 10: Protection of the Oxford Meadows SAC

The supporting text should make it clear that the policy applies to development proposals that are likely to impact on groundwater flows or watercourses that flow into the river Thames upstream of the SAC.

Core Policy 13: Conservation Target Areas

This policy is quite short and there is scope to reduce the length of this section. Suggest combining with core policy 14.

Core Policy 15: Green and Blue Infrastructure

Parts of the policy are repetitive (e.g. the second paragraph is very similar to part viii)

Core Policy 19: Soils, Contaminated Land and Stability**Core Policy 20: Hazardous Substances**

This section should provide suitable cross references to the adopted Oxfordshire Minerals and Waste Plan. Suggest combining core policies 19 and 20.

Core Policy 21: Sustainable Transport and Connectivity Improvements

We support Cherwell's commitment to work with OCC to ensure that transport improvements contribute positively to the attractiveness and safety of Cherwell's places and quality of life and respond sensitively to its natural and historic environment.

Core Policy 35: Settlement Hierarchy

The settlement hierarchy should be outlined in the spatial strategy in line with best practice. We note this policy has already been referenced in previous chapters and policy sections, which is confusing. Suggest deleting core policy 37 and move into the spatial strategy (as a new policy).

Core Policy 31: Tourism

The policy and supporting text seem to be saying slightly different things. The latter states that large tourist facilities that generate significant visitor numbers should be located in or adjacent our main towns, but then applies a town centre first approach to other facilities. Major facilities (including hotels, cinemas, museums and theatres) should be focussed in or on the edge of town centres and other locations that have excellent public transport accessibility and support active travel opportunities in or adjacent the main towns (as listed in the settlement hierarchy). The policy, however, does not make a distinction between major and non-major schemes and does not direct tourist and leisure facilities to the main towns.

Core Policy 32: Town Centre Hierarchy and Retail Uses

Cherwell will support the provision of new local centres containing a small number of shops of limited size within the allocated strategic housing sites set out in this Local Plan. Should the local centres also encourage the provision of other complimentary town centre uses, such as community and health facilities (e.g. library, nursery/day care centre and surgery) where feasible? Should you add, where appropriate, assuming some sites will not have sufficient capacity to accommodate local centres? Would you expect the largest sites to contain more town centre facilities and uses?

Core Policy 45: Settlement Gaps

Settlement gaps should be defined on a map/diagram. The proposed policy target seeks to establish to the quantum of planning permissions within 'defined settlement gaps'. However, these gaps are not defined within the supporting text. The evidence should include an assessment of the defined settlement gaps.

Core Policy 49: Health Facilities

This is a relatively short policy so it could be merged with the other health related policies.

Core Policy 50: Creating Healthy Communities

This policy is supported in line with Oxfordshire's healthy place shaping principles, subject to minor amendment.

Core Policy 51: Providing Supporting Infrastructure and Services

The Oxfordshire Infrastructure Strategy will also be an important consideration in ensuring the timely delivery of infrastructure requirements within new developments.

The investment priorities set out in this strategy is due to be updated to inform the new tranches of local plans and there may be instances where future iterations are more up to date than the IDP and vice versa. The phasing of development should also be highlighted. Suggest amending:
“In ensuring the timely delivery of infrastructure requirements, development proposals must demonstrate that full regard has been paid to the investment priorities set out in the Oxfordshire Infrastructure Strategy, Cherwell Infrastructure Delivery Plan, and all other relevant policies of this plan, including the future phasing of infrastructure within the proposed site allocations.”

In demonstrating viability constraints, regard should also be given to the spending priorities (S106 and CIL) set out in the annual Cherwell Infrastructure Funding Statement. The IDP will address the key priorities relating to the delivery of key development sites, but it represents a point in time and is not usually updated as frequently as the infrastructure funding statement. The [Oxfordshire's County Council's Guide to Developer Contributions](#) is also a relevant consideration in the prioritisation of financial contributions because it supplements district-level infrastructure delivery plans and should be read in conjunction with the Cherwell Local Plan.

The fourth paragraph is a statement rather than a policy and the references to the Delivering Infrastructure Strategy and the CIL Charging Schedule should be included in the supporting text.

Core Policy 53: Public Services and Utilities

We welcome Cherwell's commitment to work with us and others to promote faster, more reliable and more comprehensive coverage of electronic communications and improve access services and information, thus helping to reduce the need to travel. This statement is not a policy in the sense that it directly applies to development proposals, so it could be retained as supporting text.

Core Policy 60: The Oxford Canal

Core Policy 61: Residential Canal Mooring

These policies could be combined into one as they relate to proposals affecting the canal.

Development proposals should be expected to protect and enhance the canal corridor (the council is one of the key players, but the onus should be on the applicant to demonstrate this).

Area Based Policies

This section of the plan is welcomed: the policies are linked to specific long-term visions that have been subject to extensive community consultation and engagement and the overall spatial strategy set out in chapter 3. We do, however, have some detailed comments on the structure and scope of the policy objectives as set out below, where further clarity/explanation is sought.

As the plan should be considered as a whole, it is unnecessary to replicate the provisions of the district-wide spatial strategy set out in chapter 3 (see policies 62, 76, 82 and 86). The overall spatial strategy should be considered in the context of the district as a whole and the interrelationship between settlements (including the distinct roles of the main towns, service centres and villages).

Suggest deleting the 'overall spatial strategy' from the area-based policies in line with best practice and replace with a relevant link to the overall spatial strategy (expressed as a policy) as suggested below:

"In line with our vision set out above and policy xx (overall spatial strategy), new development in the area will be expected to....."

The overall spatial strategy and area-based objectives do replicate each other in places, which can make it difficult to distinguish between them. It could be argued that some of the objectives of the former are more area specific than the latter. In addition, the area-based strategy seeks to *"promote an enhanced role for Kidlington as a local service centre"*. Clearly, this is a strategic matter and should be included in the overall spatial strategy in chapter 3. In relation to Banbury, the following principle (see core policy 62) is more akin to a vision outcome and is not area specific: *"Help reduce the level of deprivation by securing benefits achieved through specific development proposals and by economic growth and diversification"*.

Suggest reviewing the objectives of the spatial strategy and the specific area-based objectives in relation to each settlement/area to ensure they are consistent and do not duplicate each other in line with best practice. The area-based objectives should be focussed on specific interventions.

In relation to Heyford Park, there is potential confusion and overlap between the area-based vision (see paragraph 7.2) and the vision outcomes (see paragraph 7.4). There should be only one vision in each area. For instance, paragraph 7.2 sets out the long-term vision to 2040. *"By 2040, Heyford Park will be a distinct place with its own facilities and employment opportunities but well related to Bicester and the wider rural area in Mid Cherwell"*. It then goes on to say that: *"Our vision for Heyford Park is....."* (see paragraph 7.4). Clearly, paragraph 7.2 is the overall vision, and the outcomes are linked to the vision. Currently, there are two overlapping visions. Some of the outcomes listed in the vision (paragraph 7.4) represent development principles (strictly policies in their own right) and are similar to the area-based objectives set out in policy 82. Examples include:

Additional development on land to the south will be well integrated with the 2022 masterplan vision and help secure further infrastructure and improved transport links.

New development will be supported, if able to boost infrastructure and deliver sustainable transport links.

Suggest revising paragraphs 7.4 and 7.5 as suggested above. In the interests of brevity and comprehension, the development principles set out in paragraphs 7.4, 7.24, 7.19 and 7.22 should be merged/incorporated into core policy 82.

Some of the vision outcomes (paragraph 7.4) are also focussed on specific sites and areas, which are more akin to an area-based strategy as development will be expected to preserve the former air base (including the central open character and functional appearance of the former flying field and the preservation of buildings of international and national importance on site – see paragraph 7.22) and implement canal and riverside improvements beyond Heford Park where appropriate. These outcomes should be expressed within the policy rather than the supporting text.

Paragraph 7.19 also provides a wish list of area-based improvements to the green-blue infrastructure network in and around the Heyford Park area, but it is unclear how these will be implemented. In addition, it is not clear how the recommendations on Banbury town centre (paragraph 4.46) have been reflected or incorporated into the area-based policies. Insert the area-based interventions into the area-based strategy (policy 82) or a specific policy (akin to the wording set out in core policy 63).

Paragraph 7.24 states that *“New proposals within the Heyford Area will....need to take account of important views and vistas, seek to limit of the impact of development on the surrounding countryside and preserve and enhance the historic environment.* This is written as a policy (even though it is in the supporting text). Have the important views and vistas been identified and where is the evidence for this? Insert paragraph 7.24 into the policy.

**Annex 2:
Climate Action – Strategic Policies Comments**

Core policy 1 (Mitigating and adapting to climate change)

Comments	Recommendation
<ul style="list-style-type: none"> Paragraph 3.5 should also refer to the Oxfordshire Net Zero Roadmap and Action Plan, which is based on PAZCO leading the way scenario. The Energy Strategy is increasingly out of date and PAZCO report provides a more accurate pathway to net zero. 	<ul style="list-style-type: none"> Amend these paragraphs accordingly
<ul style="list-style-type: none"> We note Cherwell’s intention to go further than the Oxfordshire Energy Strategy (as explained in general terms in paragraph 3.11). However, this section could more clearly articulate Cherwell’s pathway to net zero, based on the plan-led interventions set out in PAZCO report. 	<ul style="list-style-type: none"> Amend these paragraphs accordingly
<ul style="list-style-type: none"> PAZCO is a technical report rather than a strategy (reference should also be made to the Oxfordshire Net Zero Roadmap and Action Plan). 	<ul style="list-style-type: none"> Amend paragraph 3.10 accordingly
<ul style="list-style-type: none"> Paragraph 3.22 should be inserted into the policy because it sets out the minimum requirements relating to energy statements, including the preparation of a “whole life-cycle carbon emissions assessment” (the supporting text also needs to provide some context as there is no direct relationship to preceding paragraph). 	<ul style="list-style-type: none"> Amend core policy 1 and paragraph 3.22 accordingly
<ul style="list-style-type: none"> This section should also briefly explain how the whole life assessment will be used to calculate the emissions over the lifecycle of development. Whole life cycle assessments should be required at the pre application, submission and post construction stages of new development, in line with best practice (based on a recognised methodology). The assessment should calculate the expected upfront and downtime embodied carbon of new buildings and full lifecycle modelling in both outline and detailed planning applications, setting out the actions that will be taken to reduce these emissions as much as possible throughout the development process to ensure mitigation measures are considered in the design and contract stages. 	

<ul style="list-style-type: none"> The wording of the policy and supporting text is broadly welcomed, including the circular economy principles, subject to the following amendments. 	<ul style="list-style-type: none"> Remove/update part i. It is the job of the plan, rather than individual developments, to distribute growth in the most sustainable locations (unless you are specifically referring to neighbourhood plans and/or area action plans) In relation to part ii, the design and layout of new development should have regard to both the form and character of the local area (as per the National Design Guide). Part iii should reference OCC's transport hierarchy which prioritises sustainable travel options in Oxfordshire. Part ix should refer to the provision of both blue and green infrastructure in line with Cherwell's Blue and Green Infrastructure Strategy and best practice. Parts xi and xii should go further and specifically prioritise <ul style="list-style-type: none"> the reuse and retrofit of existing structures; retention over demolition and rebuild; recycled and energy efficient materials, elements and systems, preferably on site; and adaptable or flexible designs in new builds and spaces
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Core Policy 2: Zero or Low Carbon Energy Sources

Comments	Recommendation
<ul style="list-style-type: none"> In line with paragraph 3.14, smaller developments (i.e. below the 1000 square metres threshold) in Cherwell should also be encouraged to deliver zero and low carbon energy technologies, wherever possible. This paragraph does not distinguish between large and small developments. 	<ul style="list-style-type: none"> Amend the policy accordingly

Core Policy 3: The Energy Hierarchy and Energy Efficiency

Comments	Recommendation
<ul style="list-style-type: none"> We welcome the 'fabric first' approach to energy efficiency set out in core policy 3. 	<ul style="list-style-type: none"> None
<ul style="list-style-type: none"> Paragraph 3.19 states that data should be consistent with the metrics set out in the Future Homes Standard or any subsequent set of metrics required through the building regulations. The policy refers to part L of the building regulations (and should also refer to any subsequent metric set out in future iterations to the building regulations, in line with paragraph 3.19). 	<ul style="list-style-type: none"> Amend the third paragraph of the policy (steps i-ii) to provide flexibility in the event of future changes to building regulations

Core Policy 4: Achieving Net Zero Carbon Development

Comments	Recommendation
<ul style="list-style-type: none"> The minimum requirements relating to the preparation of energy statements (paragraph 3.22) should be contained within the policy itself rather than the supporting text. 	<ul style="list-style-type: none"> Amend the policy to include the specific requirements relating to energy statements

Core Policy 6: Renewable Energy

Comments	Recommendation
<ul style="list-style-type: none"> In line with paragraph 55 of the NPPF, Cherwell should establish a clear approach to defining suitable locations in relation to large-scale solar energy development that can be taken forward in the emerging Local Plan (taking account of the requirements/constraints of the technology proposed and the potential impacts on local communities and protected designations – see PPG: paragraph: 005 Reference ID: 5-005-20150618). Broad locations should be identified within the policy and shown on the Policies Map. Local authorities have agreed to adopt an area-based approach to the future planning of renewable and low carbon energy systems at a strategic level through the Oxfordshire Net Zero Roadmap and Action Plan (for example, drawing on the energy mapping data from Project LEO spatial planning tool). In recent years, there has been a surge of interest in the development of large-scale renewable energy schemes in the area, such as major solar farms, which will require careful consideration given the potential cross-boundary implications. 	<ul style="list-style-type: none"> Using the LUC and Department of Energy & Climate Change (DECC) methodology as a guide, suitable broad locations should be identified (core policy 6) at the next stage of the Local Plan process. This assessment should consider the technical constraints to deployment such as wind speed, slope and aspect, environmental constraints, and physical features as well as the cumulative impacts of other major development schemes/sites.
<ul style="list-style-type: none"> The criteria, as currently drafted, are solely focussed on addressing adverse impacts and should be more positively worded. 	<ul style="list-style-type: none"> This policy should also cover the potential opportunities arising from the careful siting of renewable energy schemes to enhance the landscape/ecological network and provide additional community benefits, in line with best practice¹. In addition, the existing wording should be amended to specifically cover: <ul style="list-style-type: none"> the sensitivity and capacity of the landscape (taking account of the assessment set out in the Oxfordshire Wildlife and Landscape Study and other relevant supporting guidance); the need to steer large-scale renewable schemes away from areas of outstanding natural beauty (a noticeable omission from the draft) and the Green

¹ Methodology for renewable energy and low carbon capacity assessment (DECC, January 2010)

	<p>Belt (except in exceptional circumstances); and</p> <ul style="list-style-type: none"> • the capacity of the distribution and transmission network to accommodate the energy needs arising from the development (for instance, renewable energy schemes should be directed to locations where there are suitable connections available to the national grid network, subject to consultation with DNO operators).
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Core Policy 9: Water Resources

Comments	Recommendation
<ul style="list-style-type: none"> • We welcome the inclusion of a new policy standard to maximise the water efficiency of development (subject to flexibility in the event that part G of the building regulations is updated/superseded during the course of the plan period). • Paragraph 3.47 should also briefly set out what justifies this approach in Cherwell (with reference to relevant evidence). 	<ul style="list-style-type: none"> • Amend the policy (fifth paragraph) to ensure that new development takes account of any equivalent future higher water efficiency standard (litres per person) that is introduced through changes to the building regulations.

Core Policy 11: Protection and Enhancement of Biodiversity

Comments	Recommendation
<ul style="list-style-type: none"> • This policy is welcomed although it is not clear how the nature recovery network zones relate to parts i and iii. The second sentence of the policy is incomplete and should be merged into the first sentence. 	<ul style="list-style-type: none"> • Update the policy and supporting text accordingly

Core Policy 14: Natural Capital and Ecosystem Services

Comments	Recommendation
<ul style="list-style-type: none"> • Cherwell's approach to natural capital and ecosystem services in response to the provisions of the Environment Act and paragraph 174 of the NPPF is supported, subject to further clarifications on the application of the Natural Capital Map and the natural capital assessment (especially in the context of the Nature Recovery Strategy) in the planning process. • Links to relevant methodologies/planning guidance would be helpful. The map should be made publicly available at the next stage of the plan process. • The map has more than one purpose – it identifies high value areas that should be protected from in appropriate development, but it also identifies low value areas where there may be opportunities to enhance natural capital and create/expand strategic networks of blue and green infrastructure. as part of the wider nature recovery network. It also shows maps of ecosystem services. • The policy should make it clear that developments must assess the impact of the development on natural capital and ecosystem services (rather than the environment per se) and 	<ul style="list-style-type: none"> • Part 1 of the policy should be amended as follows: <i>The Natural Capital Map of Oxfordshire will be expected to be used to inform the planning of development sites to ensure the protection and enhancement of those areas with high value natural capital assets and ecosystem services.</i> • Part 2 should also be amended as suggested in the text in the left-hand column. • Expand the role of the map in the supporting text and provide links to relevant information.

outline mitigation measures to offset any adverse impacts and achieve overall environmental net gain.	
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Core Policy 15: Green and Blue Infrastructure

Comments	Recommendation
<ul style="list-style-type: none"> We welcome Cherwell’s approach to the provision of blue and green infrastructure, which requires the protection and enhancement of sites that form part of the existing network and improved sustainable connections between sites. However, the policy should be more locally specific, tied to the delivery of the strategic opportunities identified in the Blue and Green Infrastructure Strategy and river catchment management plans, in line with best practice. For instance, strategic blue and green infrastructure investment in Cherwell should also prioritise (as taken from the Blue and Green Infrastructure Strategy): <ul style="list-style-type: none"> areas of deficiency in terms of access to nature, sport and play facilities and publicly accessible open space, especially within deprived communities in urban areas (e.g. Banbury and Bicester); urban greening of built up areas; improvements to existing circular and linear routes and walks between urban and rural areas (e.g. greenways); improving the condition and status of Cherwell’s blue and green corridors and wildlife sites (e.g. habitat restoration); opening up the canal and river corridors as green lungs; tree and woodland expansion (carbon sequestration); sustainable flood risk management (Otmoor basin) and drainage (e.g. rain gardens); improving air quality around key road junctions (see paragraph 186 of the NPPF); improving safe access to sites and public rights of way (in line with paragraph 92 of the NPPF); enhancing the conservation and recreational value of river valley corridors (e.g. Cherwell and Ray) and woodlands (e.g. Bernwood Forest); and integrating blue and green assets into the public realm and along green corridors (e.g. between settlement gaps). In the interests of creating an integrated and multifunctional network, Cherwell should also consider the identification and mapping of strategic BGI opportunity areas at the district level (e.g. key diagram or a separate BGI map) to facilitate the delivery of significant environmental improvements (net gain). 	<ul style="list-style-type: none"> Amend this policy to incorporate the identified priorities at a strategic scale (as set out in the Blue and Green Infrastructure Strategy)
<ul style="list-style-type: none"> This section should make it clear that BGI should be considered and provided at the earliest stages of development (as suggested in the Blue and Green Infrastructure Strategy). 	<ul style="list-style-type: none"> Amend supporting text/policy accordingly

Development Policy 1: Waste Collection and Recycling

Comments	Recommendation
<ul style="list-style-type: none"> • This section should provide suitable cross references to the adopted Oxfordshire Minerals and Waste Plan and to the Oxfordshire Resources & Waste Strategy, 2018-23 	<ul style="list-style-type: none"> • Amend supporting text
<ul style="list-style-type: none"> • In relation to rapid charging points, mobility hubs and car sharing clubs, accessible locations should be defined (e.g. town centres, transport interchanges, local centres, park and ride sites, employment designations and schools). 	<ul style="list-style-type: none"> • Amend the policy accordingly

Core Policy 23: Freight Development

Comments	Recommendation
<ul style="list-style-type: none"> • This policy is supported subject to suggested amendments to align more closely with Oxfordshire Freight and Logistics Strategy 2020-2050. 	<ul style="list-style-type: none"> • This policy should require the preparation of construction and logistic plans in respect of major developments. These plans should include detail on the amount of construction traffic generated, the routes the construction vehicles will use and any traffic management that will be in place. • In addition, major freight and logistic developments such as multi-modal interchanges and rail terminals that generate significant transport movements should be directed to accessible locations along the strategic transport network (motorway junctions close to services and urban areas and rail interchanges), which have direct links to ports and freight consolidation centres and public transport connections. • New developments should also incorporate the needs of emerging zero carbon technologies. • This policy should also seek to facilitate movement of freight along Cherwell's waterways and rail lines to and from new and existing developments and close to major freight generators, like inland ports and multi-modal interchanges.

Core Policy 24: The Effective and Efficient Use of Land – Brownfield Land and Housing Density

Comment	Recommendation
<ul style="list-style-type: none"> • Higher densities should be sought on sites in or close to town centres and major public transport interchanges, as advocated in the NPPF and the current Cherwell Local Plan, which will minimise land take and habitat loss, reduce 	<ul style="list-style-type: none"> • Set higher density thresholds in and around town centres and public transport interchanges (above 50 dwellings per hectare)

<p>car loss and facilitate a modal shift to public transport, walking and cycling.</p> <ul style="list-style-type: none"> • This approach would be consistent with the thrust of the area-based strategies, which seek to encourage and promote residential development in town centres. Bicester, Banbury and Kidlington town centres represent the most sustainable and accessible locations in Cherwell. 	
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Core Policy 38: Specialist Housing
Core Policy 39: Residential Space Standards

Comments	Recommendation
<ul style="list-style-type: none"> • Extra care housing schemes should provide good quality, generous and secure amenity space (including private gardens, communal terraces, planting and preferably food growing spaces) alongside accessible walking routes to encourage interaction with nature, social engagement and physical exercise (in line with the standards set out in the Housing our Ageing Population Panel for Innovation Report). • In relation to the public realm, extra care homes should engage positively with the street and nurture the natural environment through new trees and hedges and the preservation of mature planting, providing wildlife habitats as well as colour, shelter and shade (in line with the Oxfordshire Market Position Statement Extra Care Housing). 	<ul style="list-style-type: none"> • Insert a new criterion to ensure that extra care housing development include generous space standards (internal and external) and shared multi-use spaces.

Core Policy 44: The Oxford Green Belt

Comments	Recommendation
<ul style="list-style-type: none"> • This policy reiterates the current adopted plan, but it could more closely align with paragraphs 145 and 146 of the NPPF. 	<ul style="list-style-type: none"> • This policy should outline the opportunities to enhance the beneficial use of the Green Belt including outdoor sport and recreation facilities, biodiversity net gain, landscape enhancements and improved access to the public rights of way network (taking account of the identified interventions set out in the Cherwell Blue and Green Infrastructure Strategy and the forthcoming Green Belt review).

Core Policy 46: Achieving Well Designed Places

Comments	Recommendation
<ul style="list-style-type: none"> • Development should also be compatible with BREEAM standards which include whole lifecycle assessments ('outstanding' or 'excellent') 	<ul style="list-style-type: none"> • Amend part xiii to include BREAMM certification (in line with LETI Climate Emergency Design Guide and PAZCO).

Core Policy 47: Active Travel – Walking and Cycling

Comments	Recommendation

<ul style="list-style-type: none"> • There are strong links between core policies 47 and 48. This policy should also refer to the public rights of way network as it seeks to promote active travel across Cherwell. 	<ul style="list-style-type: none"> • Combine/merge policies 47 and 48 (in the interests of brevity and navigation)
<ul style="list-style-type: none"> • Reducing road danger from other transport modes is a key priority, but we also need to reduce the risk of accidents along pedestrian and cycle routes (segregated) and other spaces. 	<ul style="list-style-type: none"> • Amend part v accordingly

Core Policy 48: Public Rights of Way

Comments	Recommendation
<ul style="list-style-type: none"> • We support the intention of the policy to protect and enhance existing public rights of way, in line with paragraph 100 of the NPPF, but it should also seek opportunities to provide new routes (e.g. paths, trails and linear greenways) in association with planned developments, in line with the Oxfordshire Public Rights of Way Management Plan. 	<ul style="list-style-type: none"> • Amend the policy to exploit new opportunities to enhance the network as well as existing ones
<ul style="list-style-type: none"> • Public rights of way are defined/shown on the Oxfordshire Definitive Map. 	<ul style="list-style-type: none"> • Suggested amendment: <i>Public rights of way (as shown on the Oxfordshire Definitive Map) will be protected and enhanced etc</i>
<ul style="list-style-type: none"> • The Local Transport and Connectivity Plan seeks to extend and improve the public rights of way network through the use of appropriate mitigation measures (both on and offsite) from developments and partnership working to achieve shared outcomes (e.g. net zero). 	<ul style="list-style-type: none"> • This policy should also require appropriate mitigation measures to offset and adapt to the impacts of climate change on the effective operation of the public rights of way network and improve accessibility to current and would-be users.

Core Policy 55: Open Space, Sport and Recreation

Comments	Recommendation
<ul style="list-style-type: none"> • The Local Plan could draw a distinction between major and strategic development. For instance, Cherwell could require a larger proportion of open space or specific types of open space (e.g. strategic recreation space due to the district wide shortage) within urban extensions and eco towns and other schemes that exceed the thresholds set in table 10 (as set out in proposed site allocations). Larger sites on the edge of the urban area are likely to have capacity to include an area of publicly accessible recreational open space in the layout of the development. 	<ul style="list-style-type: none"> • Amend table 10 and policy 55 accordingly

Annex 3: OCC Guidance and Resources

Please note that this is not an exhaustive list and those listed below are subject to change, in cases where guidance is updated, the most recent version should be referred to.

Document(s)	URL
OCC Strategic Plan 2022-25	https://www.oxfordshire.gov.uk/council/our-vision-0
Adopted and Emerging Minerals and Waste Local Plan	https://www.oxfordshire.gov.uk/residents/environment-and-planning/planning/planning-policy/minerals-and-waste-policy/core-strategy
Pupil Place Plan	https://www.oxfordshire.gov.uk/residents/schools/our-work-schools/planning-enough-school-places
Childcare sufficiency assessment	https://www.oxfordshire.gov.uk/residents/children-education-and-families/childrens-services/delivering-services-children/childcare-market-assessment
Flood Management <ul style="list-style-type: none"> • Oxfordshire Local Flood Risk Management Strategy • Local Standards and Guidance for Surface Water Drainage on Major Development in Oxfordshire 	https://www.oxfordshirefloodtoolkit.com/planning/flood-management/
Oxfordshire's Rights of Way Management Plan 2015-25	https://www.oxfordshire.gov.uk/residents/environment-and-planning/countryside/countryside-access/rights-way-management-plan
Oxfordshire Market Position Statement, Extra Care Housing	https://www.oxfordshire.gov.uk/residents/social-and-health-care/housing-options-and-care-homes/extra-care-housing/information-providers
Local Transport and Connectivity Plan and supporting papers <ul style="list-style-type: none"> • Active Travel Strategy • Mobility Hub Strategy • Freight and Logistics Strategy • Innovation Framework • Area and Corridor Travel Plans 	https://www.oxfordshire.gov.uk/residents/roads-and-transport/connecting-oxfordshire/ltcp https://www.oxfordshire.gov.uk/residents/roads-and-transport/connecting-oxfordshire/ltcp-area-and-corridor-plans
Travel Plans	https://www.oxfordshire.gov.uk/residents/roads-and-transport/transport-policies-and-plans/transport-new-developments/travel-plans-and-statements
Active Travel <ul style="list-style-type: none"> • Cycling Design Standards • Walking Design Standards • LCWIPs 	https://www.oxfordshire.gov.uk/residents/roads-and-transport/connecting-oxfordshire/active-travel-0
Transport Development Management <ul style="list-style-type: none"> • Street Design Guide • Parking Standards for New Developments • Implementing 'Decide & Provide' 	https://www.oxfordshire.gov.uk/residents/roads-and-transport/transport-policies-and-plans/transport-new-developments/transport-development
Oxfordshire's Resources and Waste Strategy (2018-23)	https://www.oxfordshire.gov.uk/residents/environment-and-planning/waste-and-recycling/our-role-waste-management
Oxfordshire Electric Vehicle Infrastructure Strategy	https://www.oxfordshire.gov.uk/residents/environment-and-planning/energy-and-climate-change/electric-vehicles

Climate Action Framework	https://www.oxfordshire.gov.uk/residents/environment-and-planning/energy-and-climate-change/net-zero-2030
Oxfordshire Energy Strategy	https://www.oxfordshirelep.com/energystrategy
Joint Health and Wellbeing Strategy (2018-2023)	https://www.oxfordshire.gov.uk/residents/social-and-health-care/health-and-wellbeing-board/health-improvement
Oxfordshire Health Impact Assessment Toolkit	https://futureoxfordshirepartnership.org/projects/oxfordshire-health-impact-assessment-toolkit/
Digital Infrastructure Strategy	https://www.oxfordshire.gov.uk/residents/community-and-living/digital-infrastructure
Tree Policy for Oxfordshire	https://www.oxfordshire.gov.uk/residents/environment-and-planning/countryside/trees-and-woodland
Developer Contributions Guide	https://www.oxfordshire.gov.uk/residents/roads-and-transport/transport-policies-and-plans/transport-new-developments/developer-contributions
Neighbourhood Planning Guide	https://www.oxfordshire.gov.uk/residents/environment-and-planning/planning/neighbourhood-planning-guide
Oxfordshire Rail Corridor Strategy	https://www.networkrailmediacentre.co.uk/news/future-of-oxfordshire-rail-network-mapped-out-in-new-study
Future of Transport	https://assets.publishing.service.gov.uk/media/651c266bbef21800156decb0/future-of-transport-helping-local-authorities-to-unlock-the-benefits-of-technology-and-innovation-in-rural-transport.pdf
Oxfordshire Environmental Principles	https://mycouncil.oxfordshire.gov.uk/documents/s62860/CA_NOV1522R08%20Appendix%202.pdf
Pathways to a Zero Carbon Oxfordshire (PaZCO)	https://www.eci.ox.ac.uk/sites/default/files/2022-09/PazCo-final.pdf
Project LEO (Local Energy Oxfordshire)	https://project-leo.co.uk/
Community Activation	https://www.oxfordshire.gov.uk/residents/social-and-health-care/public-health-and-wellbeing/healthy-place-shaping/community-activation
Oxfordshire Way Strategic Vision	https://www.oxfordshire.gov.uk/residents/social-and-health-care/adult-social-care/oxfordshire-way
Adult Social Care Workforce Strategy	https://letstalk.oxfordshire.gov.uk/adult-social-care-workforce
OCC Vision Zero	Cabinet June 2022 (agenda item 14) https://mycouncil.oxfordshire.gov.uk/ieListDocuments.aspx?CId=115&MId=6882