

**THE CHERWELL LOCAL PLAN 2011 – 2031 (PART 1)  
PARTIAL REVIEW – OXFORD’S UNMET HOUSING NEED  
OPTIONS CONSULTATION**

**Representation Form**

Cherwell District Council is currently consulting on a Partial Review of the Cherwell Local Plan Part 1. The Partial Review is not a wholesale review of the Local Plan Part 1, which was adopted by the Council on 20 July 2015. It focuses specifically on how to accommodate additional housing and supporting infrastructure within Cherwell in order to help meet Oxford’s unmet housing needs.

It is available to view and comment on from **14 November 2016 – 9 January 2017**.

To view and comment on the document and the accompanying Initial Sustainability Appraisal Report please visit [www.cherwell.gov.uk/planningpolicyconsultation](http://www.cherwell.gov.uk/planningpolicyconsultation). A summary leaflet is also available.

The consultation documents are also available to view at public libraries across the Cherwell District, at the Council’s Linkpoints at Banbury, Bicester and Kidlington, at Banbury and Bicester Town Councils and Cherwell District Council’s main office at Bodicote House, Bodicote, Banbury. In Oxford, hard copies are available at the Oxford City Council offices at St Aldate’s Chambers, at Old Marston Library and at Summertown library.

You may wish to use this representation form to make your comments. Please email your comments to [planningpolicyconsultation@cherwell-dc.gov.uk](mailto:planningpolicyconsultation@cherwell-dc.gov.uk) or post to Planning Policy Team, Strategic Planning and the Economy, Cherwell District Council, Bodicote House, Bodicote, Banbury, OX15 4AA no later than Monday 9 January 2017.

You should receive a written acknowledgement. Email acknowledgements will be sent automatically by return. Acknowledgements by post should be received within five working days of your response being received. If you do not receive a written acknowledgement, please contact the Planning Policy Team on 01295 227985.

Please note that all comments received will be made publicly available.

Please complete one box/sheet per question.

**Representations must be received by Monday 9 January 2017**

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OPTIONS CONSULTATION 14 NOVEMBER – 9 JANUARY 2016 – REPRESENTATION FORM

**Please provide the following details:**

NAME: Gosford and Water Eaton Parish  
Council.....

ADDRESS: Exeter Hall  
Oxford Road  
  
Kidlington  
  
Oxon OX5 1AB  
  
.....

EMAIL: .....clerk@gosfordandwatereaton-pc.gov.uk.....

TEL NO: .....

AGENT NAME: Tim Perkins  
.....

AGENT ADDRESS: TMP Planning Ltd, 10 Beranburh Field, Wroughton, Swindon SN4 0QL  
.....  
.....  
.....

AGENT EMAIL: timperkins@tmpplanning.co.uk.....

AGENT TEL NO: 07843936323.....  
.....

Your details will be added to our mailing list and you will be kept informed of future progress of this document and other Local Plan documents. If you wish to be removed from this mailing list please contact the Planning Policy team. Details are at the bottom of this representation form.

## **Introduction**

The majority of Gosford and Water Eaton Parish is land within the Green Belt which comprises the gap between Kidlington/Gosford and Oxford. The Parish area includes a large number of the sites put forward in this consultation and would be dramatically affected by these developments and others in the surrounding area.

While the Parish Council understands the urgency to conclude the Local Plan Review, it is extremely concerned by the huge volume of complex new reports issued for consultation over the Christmas period, abbreviating the working period available for consideration and response. This is particularly true given the potential effects on the Parish both in relation to the Green Belt and in terms of the effects on the environment, local community and transport.

The forward work programme for conclusion and submission in July 2017 suggests that there will be minimal time for a fair and genuine review of all relevant issues, and the Council and local residents are very concerned that this momentous decision - to potentially release large areas of highly valued Green Belt land for development- is being rushed to the detriment of sound decision making.

If Cherwell District Council fails to listen and give due regard to responses made, the Parish Council and local people will present a case to the Local Plan Inspector explaining their valid concerns.

The timing of this set of Options is particularly confusing for local people, given the very recent adoption of the Kidlington Masterplan SPD in December 2016 (which covers Gosford and Water Eaton Parish), designed to implement Local Plan policies to 2031, which inter alia emphasises the following:

- The permanency of the Green Belt designation which prevents substantive new development in the area (Policy ESD 14 in the adopted Local Plan Part 1):
- To strengthen Kidlington's distinctive character of a 'village set in the landscape' and reveal its hidden gems to a wider audience. (Framework themes and objectives)
- To protect and enhance Kidlington's landscape and biodiversity assets. (Framework objectives)

Gosford and Water Eaton is directly adjacent to Kidlington and includes some built up areas, however is mainly undeveloped land which provides an important part of the landscape within which Kidlington is set protecting its identity. The existence of the Green Belt within Gosford and Water Eaton has prevented both Kidlington and Gosford and Water Eaton merging with Oxford.

The Masterplan SPD is concerned primarily with development within the village boundaries – but proceeds on the assumption that the surrounding Green Belt is largely unaffected.

The 2015 Green Belt Study assesses the contribution local Green Belt land makes to meeting the NPPF criteria. Plans 4.1-4.5 in that document confirm that all Green Belt land lying between Kidlington/Gosford and Oxford is important in several respects in fulfilling these criteria.

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Without labouing the evidence, it is clear that both as undeveloped Green Belt land, and as open countryside which performs a valuable role in defining the character and landscape setting of this distinctive village, all existing Local Development Plan Policy confirms that its undeveloped character should be protected, and that no substantial new development should take place within this area.

1. **The Cherwell Local Plan 2011 – 2031 (Part 1) Partial Review – Oxford’s Unmet Housing Need**

<b>LOCAL PLAN PART 1 PARTIAL REVIEW – OPTIONS CONSULTATION PAPER</b>	
<b>Question 1 – Cherwell’s Contribution to Oxford’s Housing Needs</b>	Is 4,400 homes the appropriate housing requirement for Cherwell in seeking to meet Oxford's unmet housing need?

No, the Parish Council does not agree, and considers the scale of the proposed development is untested and unjustified. It will have a major impact on the Green Belt, environment and transport infrastructure within the Parish and the surrounding area.

We note that the figure of 15,000 new homes to meet Oxford’s Unmet Need, and subsequent apportionment of 4400 to Cherwell, was determined and agreed by the Oxford Growth Board, and endorsed by Cherwell DC. The work carried out through the Spatial Options Assessment and the subsequent Oxford Growth Board report led to the 4400 figure. This was based on an assessment as to which areas were most suitable together with a number of general assumptions about how many homes could be delivered in each area. These three areas, given a “GREEN” rating by the by the Growth Board, are all within Area of Search A – Kidlington and surrounding area and are within the Green Belt (with the majority of this assumed provision in Gosford and Water Eaton Parish). The breakdown is shown below:

**Land North of Oxford 2200**

**Land at Begbroke 1650**

**Land SE of Kidlington 550**

**TOTAL 4400**

The apportionment to Cherwell is based on an assumption that three areas within the Green Belt can provide this level of housing and are most suitable. Despite the suggestion by Cherwell DC in the consultation that no decision has been reached and all options remain under consideration, the information is presented in a way which leads to a conclusion that Green Belt release is needed to meet the apportionment. This is of course unsurprising as Green Belt release was the basis for reaching the apportionment in the first place, creating a circular, and in our view, flawed argument.

The assessments used to arrive at these three areas are very high level, lacking in detail and taking very little account of local impacts. We are very concerned that this figure is as yet totally untested and takes no real account of the environmental, transport and Green Belt impacts of the development.

We are concerned about the mixed messages given out by Cherwell DC at the recent public meeting in

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Kidlington indicating both that the number of 4400 cannot be altered, and also that views are sought on the given figure. In our view the Options Paper (para 1.34) is very clear “....we must test whether this level of development would be sustainable and deliverable through our Local Plan process.”

We also note that the Oxford Growth Board as reported in para. 2.13 of the Options Paper stated:

*“6. The Board should note that the working assumption of 15,000 is a working figure to be used by the programme as a benchmark for assessing the spatial options for growth and is not an agreed figure for the true amount of unmet need”*

We note further that Para 54 of the Oxford Growth Board Report 26<sup>th</sup> September 2016 states:

*“This Programme does not allocate sites. The Programme demonstrates the ability of each District to deliver a range of sites that can be shown to closely relate to Oxford and thus to enable the unmet housing need of Oxford to be apportioned in a manner which would deliver development which is sustainable over a realistic time period. The identified areas of search are not intended as an exhaustive list and the final allocation of any development sites within these areas will be up to individual Local Plans to take forward, taking into account wider detailed planning considerations, and the fit with proposed local strategies and potentially a wider set of 'reasonable alternatives'.”*

We do not agree that the study has demonstrated the “ability of each district to deliver a range of sites that can be shown to closely relate to Oxford and thus to enable the unmet housing need of Oxford to be apportioned”, as in the case of Cherwell this is based on a premise that those deliverable sites are in the Green Belt.

Given all of the above, the figure cannot possibly be decided until much more detailed work about its impacts has been carried out. The starting point for the apportionment is wrong in our view as it is based on an assumption that Green Belt land is suitable and deliverable, contrary to national planning policy and guidance. The original assessment has not been based on a proper elimination of non-Green Belt and brownfield sites before consideration of Green Belt sites. We note for example the proposed new allocation of a Garden Village, outside the Green Belt in West Oxfordshire, which is directed towards meeting Oxford's unmet housing needs.

The National Planning Policy Framework (NPPF) is clear in paras. 88 and 89 that new building within the Green Belt is “inappropriate” and should only be allowed in “very special circumstances”.

We would also refer to the statement in para. 034 of the Planning Practice Guidance (Stage 5 – Housing and Economic Land Availability Assessments):

***“In decision taking, can unmet need for housing outweigh Green Belt protection?”***

*Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.”*

Our view at this stage is that given the potential impacts which are considered further in other parts of our response, 4400 homes is too high and a much lower figure should be considered.

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LOCAL PLAN PART 1 PARTIAL REVIEW – OPTIONS CONSULTATION PAPER	
Question 2 – Spatial Relationship to Oxford	Do you agree that we need to specifically meet Oxford's needs in planning for the additional housing development?

This is not proven. The Parish Council fully accepts that there are housing problems within Oxford, especially regarding affordability which is a key issue for workers looking for accommodation.

Whilst we accept that much work has been carried out to look at Oxford’s housing capacity, we note that the Updated Advice Note On Oxford’s Development Capacity prepared by Fortismere Associates Aug 2015 made a number of recommendations, and that these still need to be addressed through review of the Oxford Local Plan . These unanswered questions need to be addressed before land is released in other Districts, especially land within the Green Belt.

We therefore do not agree that Cherwell should accept Oxford’s housing needs on the scale proposed given the likely impact on the Green Belt, communities and the environment.

LOCAL PLAN PART 1 PARTIAL REVIEW – OPTIONS CONSULTATION PAPER	
Question 3 – Cherwell Issues	Are there any new issues that we need to consider as we continue to assess development options?

In addition to those already identified in para.4.18 of the Options Paper:

- The importance of maintaining the separate identity of Kidlington/Gosford from Oxford
- Ensuring that any new development includes substantial provision for affordable housing.

LOCAL PLAN PART 1 PARTIAL REVIEW – OPTIONS CONSULTATION PAPER	
Question 4 – Draft Vision for Meeting Oxford’s Unmet Housing Needs in Cherwell	Do you support the draft vision? Are changes required?

The draft vision should make reference to existing communities and the environment. Suggested re-wording below:

*“To provide new balanced communities that are well connected to Oxford, are of exemplar design and are supported by necessary infrastructure; that minimise impacts on existing communities and the environment that provide for a range of household types and incomes reflecting Oxford’s diverse needs; that support the city’s world-class economy and universities, that support its local employment base; and ensure that people have convenient, affordable and sustainable travel opportunities to the city's places of work, study and recreation and to its services and facilities.”*

To achieve balanced communities, the needs of the existing villages, and their villagers, need to be taken into account. In villages such as Gosford/Kidlington local services (schools, transport, parking, medical

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centres) are already under strain, and cannot just deliver extra capacity for more inhabitants. A primary school already has to be extended, the lack of parking continually increases, and, at peak times, Gosford/Kidlington and its roundabout are very congested. Travelling into and out of Oxford from Gosford/Kidlington is already very difficult due to congestion. Another 4000 plus commuters will exacerbate the problem.

The draft vision should recognise that meeting Oxford’s needs must take account of the impact on the environment and local communities including:

- Safeguarding the countryside from encroachment;
- Loss of access to the open countryside for the urban population;
- Removing opportunities for outdoor sport and recreation near urban areas . e.g. closing the North Oxford Golf course and building houses upon that land;
- Removing valuable agricultural land; and
- Adding to the parking problems and travel congestion, rather than providing sustainable travel opportunities for the existing and new villagers.

LOCAL PLAN PART 1 PARTIAL REVIEW – OPTIONS CONSULTATION PAPER	
Question 5 – Draft Strategic Objective SO16	Do you support draft Strategic Objective SO16? Are changes required?

As discussed earlier whilst the objective itself can be supported the Parish Council has major concerns about how the unmet housing need and apportionment has been determined. An suggested amendment to the Objective would be:

*“To work with Oxford City Council and Oxfordshire County Council in delivering Cherwell's appropriate contribution to meeting Oxford's unmet housing needs by 2031.”*

LOCAL PLAN PART 1 PARTIAL REVIEW – OPTIONS CONSULTATION PAPER	
Question 6 – Draft Strategic Objective SO17	Do you support draft Strategic Objective SO17? Are changes required?

The objective as set out below is unbalanced in that it takes no account of environmental or social factors which need to be weighed in any decision about supporting economic growth.

*“To provide Cherwell's contribution to meeting Oxford's unmet housing needs so that it supports the projected economic growth which underpins the agreed Oxfordshire Strategic Housing Market*

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Assessment 2014 and the local economies of Oxford and Cherwell whilst ensuring that this is balanced with the needs of existing communities and protection of the environment.”

LOCAL PLAN PART 1 PARTIAL REVIEW – OPTIONS CONSULTATION PAPER	
Question 7 – Draft Strategic Objective SO18	Do you support draft Strategic Objective SO18? Are changes required?

The Parish Council supports this objective, and agrees that this needs to be fully addressed in any development proposals. As the main impetus is to deliver a supply of affordable homes for local employees – then the Plan should consider specific affordable housing quotas of at least 50%, as applies within Oxford.

The Parish Council would like to deliver a small number of low cost, affordable housing within its urban gaps to meet the needs of key workers. Policy ESD14 of the Local Plan states that:

*“Development within the Green Belt will only be permitted if it maintains the Green Belt’s openness and does not conflict with the purposes of the Green Belt or harm its visual amenities. “*

The Parish Council questions whether it will be able to build economically viable low, cost affordable housing on the edges of the Parish which is expensive 'commuter' favoured land.

We refer to Policy H6 (Local Plan Chapter 2: Housing) which states:

*“within settlements in the Oxford Green Belt and within or immediately adjacent to rural settlements elsewhere planning permission may be granted for small-scale low-cost housing development which is to help meet a specific and identified local housing need which cannot be satisfied elsewhere, provided that:*

- 1. It can be demonstrated that the proposed development is economically viable in terms of its ability to meet the need identified”.*

Affordability will be an issue especially if company and landlord purchases are allowed. Housing within new developments should not only be about affordability but accessibility to individuals and families. Oxford has a very high percentage of landlord and company owned residential properties, and the Parish is concerned that the new development will simply allow them to expand their property portfolios and drive up prices.

LOCAL PLAN PART 1 PARTIAL REVIEW – OPTIONS CONSULTATION PAPER	
Question 8 – Draft Strategic Objective SO19	Do you support draft Strategic Objective SO19? Are changes required?

The Parish supports this objective, however we are very concerned about the potential impact of large scale development on existing transport infrastructure given the congestion on the road network at

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peak times, cutting of bus services by Oxfordshire CC and parking problems. We would question how new development can be successfully accommodated without exacerbating these problems.

LOCAL PLAN PART 1 PARTIAL REVIEW – OPTIONS CONSULTATION PAPER	
Question 9 – Identifying Areas of Search	Do you have any comments on the Areas of Search we have defined?

No comment at this stage

LOCAL PLAN PART 1 PARTIAL REVIEW – OPTIONS CONSULTATION PAPER	
Question 10 – Site Size Threshold	Do you agree with our minimum site size threshold of two hectares for the purpose of site identification? Do you agree that we should not be seeking to allocate sites for less than 100 homes?

The Parish Council considers that smaller sites of less than 100 homes should be considered. This will spread the burden and impact on surrounding areas and residents.

Smaller sites with fewer homes would be more in keeping with preserving the character of the village of Gosford/Kidlington. It would meet the purposes of the Green Belt to 'preserve the setting and special character of historic towns'.

Gosford/Kidlington village has 6000 houses. Adding 4400 more would virtually double the size of the village and destroy its current character and setting.

LOCAL PLAN PART 1 PARTIAL REVIEW – OPTIONS CONSULTATION PAPER	
Question 11 – Identified Potential Strategic Development Sites	Do you have any comments on the sites we have identified? Please provide the site reference number when providing your views.

This response addresses all our comments in relation to sites identified within Gosford and Water Eaton Parish. Our responses addresses Question 11, 14 and in part Question 20.

As a first general point we consider that priority should be given to the consideration of non-Green Belt sites and brownfield sites before any consideration of Green Belt locations. This is supported by Paragraph 17 of the National Planning Policy Framework which sets out Core Planning Principles including:

- *Take account of the different roles and character of different areas, promoting the vitality of our main urban areas, **protecting the Green Belts around them** [OUR EMPHASIS], recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities.*

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- *Encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value*

The second general point to make is that all of the identified sites within the Parish are within the designated Green Belt. Housing development within the Green Belt is by definition “inappropriate development” and should only be allowed in “very special circumstances.”

The Green Belt Study carried out for the Oxford Growth Board shows that all the parcels of land within the Parish score “HIGH” against one or more of the Green Belt purposes. In other words the area is very important in contributing to the Green Belt and preventing Kidlington/Gosford and Oxford merging.

We have considered the sites identified in three groups:

#### Sites between Gosford and A34

Site 125 – As well as being in the Green Belt, most of this site is shown as being in Flood Zone 3 and should not be considered further on this basis. The northern part of this area is known to flood regularly and existing adjacent residential areas in Gosford/Kidlington (e.g. Cherwell Avenue and Queens Avenue) and some properties on Water Eaton Lane are also in Flood Zone 3. Development within this and surrounding areas has the potential to increase flooding risks for existing properties in Cherwell and downstream in Oxford.

Site 178 – We note that this site has been promoted for circa 700 homes. This site is in the Green Belt and forms an important role in preventing the merging of Kidlington/Gosford and Oxford. The site scores “HIGH” in the Green Belt study against the purpose of preventing neighbouring towns merging and development in this area would significantly erode the Kidlington/Gosford gap.

#### Sites east of A34/Water Eaton P&R/Oxford Parkway and north of Cutteslowe

Sites 38, 50, 123 and 167 – This cluster of sites lies to the north of Oxford and south of the A34 and including land around the Oxford Parkway station and Water Eaton Park and Ride. These sites also score “HIGH” in the Green Belt study against one or more of the Green Belt purposes and are important both in stopping further urban sprawl and preventing the merger of Kidlington/Gosford and Oxford. We also note that there has been a substantial representation from Oxford City Council in relation to this area which promotes major development around Oxford Parkway station. Whilst we can see some benefits in locating close to the station there is a clearly a risk that given the easy access to London that this area would encourage London commuters, driving up house prices as a result and would not help in solving Oxford's housing needs. Other points to consider are:

- The eastern fringes of this area are also within Flood Zones 2 and 3.
- There are Listed Buildings at Frideswide Farm and Water Eaton.
- The North Oxford Golf Club is an important leisure facility which is protected as Green Space in the adopted Cherwell Local Plan.

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- We are also aware that the area between Cutteslowe and the Water Eaton Park & Ride is of considerable archaeological importance including the site of the Cutteslowe Deserted Mediaeval village in the area around St Frideswide Farm with surface evidence of a number of cottages and houses. There is also evidence of a roman road and old 18th century main road of which Water Eaton Lane is a part.

Sites west of the A34/Pear Tree Interchange

Sites – 39, 41, 124, 168,177 – This group of sites performs “HIGH” against two of the four Green Belt purposes in the Green Belt study and again is an important area in preventing urban sprawl and merging of Kidlington and Oxford. The sites are adjacent to the Oxford Canal which is a very important recreational corridor and designated Conservation Area within the District. The corridor is protected through Policy ESD16 of the adopted Cherwell Local Plan. Development in this area has the potential for adverse effects on the Canal.

LOCAL PLAN PART 1 PARTIAL REVIEW – OPTIONS CONSULTATION PAPER	
<b>Question 12 – Site Promotions</b>	Do any site promoters / developers / landowners wish to provide updated or supporting information about your sites?

Not applicable

LOCAL PLAN PART 1 PARTIAL REVIEW – OPTIONS CONSULTATION PAPER	
<b>Question 13 – Other Potential Strategic Development Sites</b>	Are there any potential sites that we have not identified?

No comments

LOCAL PLAN PART 1 PARTIAL REVIEW – OPTIONS CONSULTATION PAPER	
<b>Question 14 – Representations and Submissions</b>	Do you have any comments on the representations and submissions we have received so far. Do you disagree with any we have received? Please provide the representation number where applicable.

Please see our comments on Question 11.

LOCAL PLAN PART 1 PARTIAL REVIEW – OPTIONS CONSULTATION PAPER	
<b>Question 15 – Interim Transport Assessment – Key Findings for Areas of Search</b>	Do you have any comments on the Assessment and its findings?

We note that the Areas of Search were assessed against 8 transport criteria. For the Kidlington Area of Search (A) (including the Parish) this is shown as performing well against access to public transport and

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to Oxford's jobs and infrastructure. However when it comes to congestion (Criteria 5) the area performs very poorly and is scored "RED" indicating "Significant congestion and lack of capacity on major roads in vicinity of area of search, meaning additional car-based trips will worsen existing delays." Whilst we appreciate that this doesn't take account of any improvements that might be put in place with new development, the Parish Council is very concerned as to whether sufficient infrastructure can be put in place to cope with such large scale development. In addition any additional infrastructure will in turn have impacts on the Green Belt and local communities.

Whilst there are transport improvements proposed and discussed in the assessment these mainly relate to addressing existing capacity constraints/congestion and do not take account of the further significant growth now proposed in this area.

We also have concern regarding the Rapid Transport system which appears to be a wish rather than a fully funded proposal and therefore we have to doubt whether it will be delivered in time to benefit residents in any new development.

LOCAL PLAN PART 1 PARTIAL REVIEW – OPTIONS CONSULTATION PAPER	
<b>Question 16 – Areas of Search – Selection of Options</b>	Do you agree with all of the Areas of Search being considered reasonable?

No comment at this stage

LOCAL PLAN PART 1 PARTIAL REVIEW – OPTIONS CONSULTATION PAPER	
<b>Question 17 – Initial Sustainability Appraisal - Key Findings for Areas of Search</b>	Do you have any comments on the Initial Sustainability Appraisal and its findings for Areas of Search?

The Sustainability Appraisal (SA) is based on considering areas against a range of economic, social and environmental objectives. It is a high level study, based on a number of assumptions and subjective judgements, and therefore can only have limited value in assessing the suitability of locations for development.

Whilst we note that Area A - Kidlington and the surrounding area - appears to perform well against some of the criteria, notably access to services, the assessment also highlights a number of potential negative effects, notably on landscape, biodiversity and heritage.

Given the scale of development proposed, the benefits to health and well being (objective 2) (measured by proximity to existing public services e.g. doctor's surgeries, sports facilities and open space etc.) is overstated in our view. These facilities are provided to serve existing communities, and will not be able to cater for new residents as well, without significant expansion. Examples include doctor surgeries and hospital services. Any large scale development would need to provide new services for new residents.

The SA sets out that for Area of Search A, Kidlington, there is potential for both negative and positive effects

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on air quality and congestion (Objective 10). Negative effects caused by increased traffic, given how close the area is to existing AQMAs, is of considerable concern. This further emphasises the need to deliver public transport, cycling and walking links to minimise this impact. As stated elsewhere, the Parish is very concerned about the potential impacts on congestion arising from such large scale development.

On objective 5 (creating and sustaining vibrant communities), the potential for negative effects on existing communities is significant, and not just through the construction phase, but also once built through increased noise, light and traffic pollution, for example. At a high level of assessment as that used in the SA, there should be a recognition that significant adverse effects are possible, and that careful consideration needs to be given to help minimise these.

Whilst we note there is some recognition of the impact of settlements coalescing under Objective 8 (landscape), we believe that this is understating the impact. In terms of sustainability, the potential that existing settlements will lose their identity and merge together, is a major consideration for current and future generations. It should be given greater weight.

<b>LOCAL PLAN PART 1 PARTIAL REVIEW – OPTIONS CONSULTATION PAPER</b>	
<b>Question 18 – Strategic Development Sites – Initial Selection of Options for Testing</b>	Do you agree with the initial selection of site options for testing?

Whilst we note Cherwell DC’s conclusion that Areas of Search A and B perform best in the Sustainability Appraisal and Transport Assessment, we do not agree that narrowing down the Area of Search, without taking account of the existence of Green Belt, the key principles of prevent towns and villages merging, and protecting open countryside, is the right one. We have concerns about the way the scoring has been carried out in the assessment. In some places, positive effects have been overstated and negative effects understated.

In our view, the decision to focus on these areas is derived from a flawed argument presented by the Oxford Growth Board. The Oxford Growth Board determined apportionment for Cherwell based on the assumption that Green Belt sites could deliver development.

<b>LOCAL PLAN PART 1 PARTIAL REVIEW – OPTIONS CONSULTATION PAPER</b>	
<b>Question 19 – Interim Transport Assessment – Key Findings for Strategic Development Sites</b>	Do you have any comments on the Assessment and its findings?

In relation to the sites within Gosford and Water Eaton we note that many of these perform poorly in terms of criteria relating to congestion, road safety incidents and proximity to Air Quality Management Areas. These are major areas of concern.

As stated in our response to Question 15 the Parish Council is very concerned as to whether sufficient transport infrastructure can be put in place to cope with such large scale development. In addition any

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additional infrastructure will also have impacts on the Green Belt and on the environment and local communities.

<b>LOCAL PLAN PART 1 PARTIAL REVIEW – OPTIONS CONSULTATION PAPER</b>	
<b>Question 20 – Initial Sustainability Appraisal – Key Findings for Strategic Development Sites</b>	Do you have any comments on the SA's initial findings for sites?

We have already explained in our response to Question 17 some of the concerns in relation the SA assessment scoring process. These would also apply to the appraisal of specific sites.

We note that whilst the SA results show that many of the sites in Gosford and Water Eaton have positive scores in relation to meeting Oxford’s needs, they have as many negative impacts when considering the impacts on the environment, the use of greenfield land, and potential effects on air quality/congestion.

In our response to Question 11, we highlighted specific environmental impacts which need to be taken into account. These comments are equally relevant to the Sustainability Appraisal.

<b>LOCAL PLAN PART 1 PARTIAL REVIEW – OPTIONS CONSULTATION PAPER</b>	
<b>Question 21 – Evidence Base</b>	Do you have any comments on our evidence base? Are there are other pieces of evidence that we need to consider?

The Parish Council believes that housing need should be based on up to date economic forecasting. We note, for example, that Brexit has already seen a down turn in EU research funding and a decline in the level of recruitment by the University. The University has called for voluntary redundancies from centrally employed staff. Employment is not set to grow any further at this time. On this basis, an independent review of the economic forecasting should be undertaken which takes these factors into account, as they could affect future housing needs.

<b>LOCAL PLAN PART 1 PARTIAL REVIEW – OPTIONS CONSULTATION PAPER</b>	
<b>Question 22 – Five Year Land Supply Start Date</b>	Is 2021 a justified and appropriate start date for being required to meet Oxford's housing needs and to deliver a five-year supply?

The Parish considers that the case for meeting Oxford’s housing needs on the scale envisaged has not been proved. We therefore have no specific comment in response to this question at this time

We note however that once housing has started, the practicalities of identifying whether or not new housing is contributing towards Oxford’s unmet need or to Cherwell’s existing need are likely to be very difficult.

<b>LOCAL PLAN PART 1 PARTIAL REVIEW – OPTIONS CONSULTATION PAPER</b>	
<b>Question 23 – Maintaining a Five Year Land Supply</b>	Do you agree that phasing of land release within individual strategic development sites will promote developer competition and assist the maintenance of a five year housing supply to meet Oxford's unmet housing needs? What alternatives would you suggest?

As the Parish considers that the case for providing to meet Oxford’s housing needs on the scale envisaged is unproven at this time we have no specific comment in response to this question.

<b>LOCAL PLAN PART 1 PARTIAL REVIEW – OPTIONS CONSULTATION PAPER</b>	
<b>Question 24 – Monitoring Delivery</b>	Are there any proposals you would like us to consider to ensure that the final plan is delivered and sustainable development is achieved.

No comment

**2. The Cherwell Local Plan Part 1 Partial Review – Initial Sustainability Appraisal Report**

<b>Initial Sustainability Appraisal Report</b>
<p><b>Do you have any comments on the Initial Sustainability Appraisal Report accompanying the Local Plan Part 1 Partial Review consultation?</b>                      Please make it clear to which part of the Sustainability Appraisal your comments relate.</p> <p>Our comments in relation to the Sustainability Appraisal have already been made in our responses to other questions</p>

**Thank you for taking the time to respond to this consultation. Please ensure your comments are submitted by 9 January 2017.**