

**Cherwell Local Plan 2011-2031 (Part 1)
Partial Review – Oxford’s Unmet Housing Need
Regulation 19 Consultation - Proposed Submission Documents July 2017**

Representations from Kidlington Development Watch

Information requested in part A of the representation form

Organisation: Kidlington Development Watch

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10 individual representations (corresponding to Part B forms) are appended covering the following matters:

- 1. Objection to Consultation Process**
- 2. Underlying assumptions and strategy**
- 3. Policy PR1 : “Achieving Sustainable Development for Oxford’s Needs” : the overall amount of housing proposed and the SHMA**
- 4. Policy PR1 : “Achieving Sustainable Development for Oxford’s Needs” ” – the proposed development is not sustainable.**
- 5. Policy PR3 The Oxford Green Belt**
- 6. Policy PR4a Sustainable Transport**
- 7. The allocations: Policies PR6a, 6b,7a,7b,8,9 and 10**
- 8. Land areas for residential development in the allocations are inconsistent with density and number of houses specified.**
- 9. Policy PR11 Infrastructure Delivery**
- 10. Policy PR12b**

Each representation includes all of the information requested in the Part B form, namely:

Relevant document(s) and sections (questions 1 & 2)

Soundness and Compliance (question 3)

Reasons for Our objection or representation (question 4)

The change we seek to the plan (question 5)

Our answers to questions 6 and 7 on the Part B form are the same for each representation, as follows:

Question 6. Yes, we wish to participate at the oral Examination into the plan.

(continued...)

Question 7. (“Why is this necessary?”)

We (Kidlington Development Watch – KDW) consider this is necessary because of: our extensive involvement with the consultations at all stages of the Cherwell Local Plan to date; the considerable work we have undertaken to publicise the consultation ourselves; of the feedback we have received from Kidlington residents; and, the large numbers of them who have responded as a result of our efforts.

KDW is a voluntary organisation run by Kidlington residents with experience and interest in planning issues. We believe that effective, informed public participation in planning consultations is vital to democratic policy making. We publicise consultations that directly affect Kidlington and offer advice on how people can best make their views known. In this and the previous options consultation we printed and distributed leaflets, put up posters, ran a stall on many Saturday markets and at other events, participated in public and parish council meetings, provided information on our website and responded to requests for information from Kidlington residents.

As a result, we have gained a very good understanding of the views of Kidlington residents, a large number of whom have made representations because of our activities. KDW’s representations therefore reflect the views of much of the Kidlington community.

At the examination, in order of priority we would like to participate in the discussions on:

1. Oxford’s Unmet Housing Need, the SHMA, and Policy PR1
 2. The Green Belt
 3. Overall Strategy
 4. The Consultation Process
 5. The other topics on which we have commented.
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Representation 1 of 10, (Part B form) from Kidlington Development Watch

1. Objection to Consultation Process

1.1 Relevant document and sections. Submission Plan and Statement of Consultation in their entirety.

1.2 Soundness and Compliance. We consider that the plan is **not legally and procedurally compliant** and **unsound** because it is **not positively prepared and not justified**.

Reasons for Our Objection.

1.3 We consider that the plan is uncompliant and unsound because (a) it does not seriously take into account the public consultation response at the options stage and (b) the content of the plan was predetermined in advance of that consultation as evidenced, for example, by public statements made by the leader of the Council and the Council's senior officer during the consultation period. This predetermination has carried through to the consultation on this draft submission plan.

1.4 The Statement of Consultation document is both misleading and inadequate.

1.5 It is peppered with bland statements such as "The comments made on the consultation process have been noted." and "The consultation exercise has met all the requirements stipulated by the relevant planning regulations." It gives every impression that consultation is simply a process and the response can happily be ignored provided the process has been followed, an impression reinforced by the public comments of the Council Leader and Senior Officer.

1.6 Question 1 on the Options Consultation asked "Is 4,400 homes the appropriate housing requirement for Cherwell?". The Statement of Consultation notes that "Overwhelmingly the representations objected to this figure." (p12). The Council has not made any change in response to that overwhelming response.

1.7 Moreover, it is clear that the Council never had any intention of doing so. At the public meeting (attended by around 300 residents) in Kidlington on 4th January the Council Leader and Senior Officer stated that 4,400 houses figure was fixed and would not be changed, despite the very first question on the consultation asking if it was an appropriate figure. (When publicly challenged the response given was "It's the process"). We consider therefore that Cherwell Council has predetermined and invalidated the outcome of its consultation.

1.8 This was reinforced by the many angry comments we heard from residents saying "it's all been decided, hasn't it?", an impression that some said was confirmed by their discussions with planning officers at Cherwell's public exhibitions.

1.9 The options consultation had no question about the acceptability of development in the Green Belt. We consider that this was a very serious omission given that this is one of the most significant matters in the plan. It also means that the public was denied the opportunity to give its views on this major issue and the Council denied

itself the opportunity to assess these views, calling into question the whole consultation process.

1.10 The Statement of Consultation includes the statement that “There is no evidence not to rely on the SHMA” (p23 Officer Reponse - Statement of Consultation). This is clearly untrue. Extensive evidence was provided at the time of the examination into Local Plan Pt 1 that the SHMA was not sound (see for example the report by Prof Alan Wenban Smith).

1.11 It also refers to 470 “postcard type representations” and quotes the standard text that they contained. These postcards were organised by KDW and another local group. However, the Statement fails to mention that the vast majority of these postcards also included individual handwritten, personal objections to the plan and it does not say how these were addressed.

1.12 The Council gave every impression of wishing to discourage a public response in both consultations. The large number of documents produced were difficult to access and the response forms long and complicated. We (KDW) with limited resources were much more effective in alerting the public to the plans. Both consultations were scheduled to occur over holiday periods (at Christmas and in the Summer). The Council only relented in extending the latest consultation in response to a legal threat concerning the lack of an important document in the evidence base. Up to that point the Council had shown no intention of responding to public concern.

1.13 We consider that the Council has discouraged public comment on the plan, has ignored what comment has been made and has made a mockery of consultation by predetermining the outcome. The plan is therefore **not justified** and **not procedurally or legally compliant**.

1.16 Changes Sought. The plan should be withdrawn or substantially rewritten to reflect the views expressed by the public during the consultation.

Examination.

1.17 Question 6. Yes, we wish to participate at the oral Examination into the plan.

1.18 Question 7. (“Why is this necessary?”)

We (Kidlington Development Watch – KDW) consider this is necessary because of: our extensive involvement with the consultations at all stages of the Cherwell Local Plan to date; the considerable work we have undertaken to publicise the consultation ourselves; of the feedback we have received from Kidlington residents; and, the large numbers of them who have responded as a result of our efforts.

KDW is a voluntary organisation run by Kidlington residents with experience and interest in planning issues. We believe that effective, informed public participation in planning consultations is vital to democratic policy making. We publicise consultations that directly affect Kidlington and offer advice on how people can best make their views known. In relation to this and the previous options consultation we printed and distributed leaflets, put up posters, ran a stall on many Saturday markets and at other events, participated in public and parish council meetings, provided

information on our website and responded to requests for information from Kidlington residents.

As a result, we have gained a very good understanding of the views of Kidlington residents, a large number of whom have made representations because of our activities. KDW's representations therefore reflect the views of much of the Kidlington community.

Representation 2 of 10, (Part B form) from Kidlington Development Watch

2. Underlying assumptions and strategy

2.1 Relevant document and sections. Submission Plan: Context, Objectives and Strategy for Plan as outlined on pages 32 to 65

2.2 Soundness and Compliance, We consider the plan **unsound** because it is not **justified, not positively prepared, not effective** and possibly **not legally compliant** because Cherwell and other authorities have failed in their duty to cooperate.

Reasons for our objections.

2.3 We consider that the growth and the level of housing need are much lower than estimated for reasons given below (see PR1). They rely on assumptions of high growth in jobs in Oxfordshire requiring many people to move into the county. These projections of jobs growth are exaggerated in order to support funding bids from the Local Enterprise Partnership.

2.4 Some growth will of course occur. However much of this can continue to be directed away from the City as under the 'country towns' approach which has operated in the past. Indeed, through true co-operation between the Oxfordshire Councils, such an alternative strategy would will help to protect the city from over development, would be consistent with the fundamental purpose of the Green Belt, and would be sustainable.

2.5 In contrast, the expansion of Oxford is unsustainable. The more Oxford expands the more will be the damage to the historic city and the more would be the loss of the Green Belt which exists to protect it. The Green Belt would gradually disappear.

2.6 Oxford City Council has contributed to development pressures by encouraging excessive provision for employment land in the city to the detriment of meeting housing need. In doing so we argue that it has failed in its duty to cooperate by ignoring the consequences of this for the surrounding Districts. It has also put at risk the very things that make Oxford an attractive location – such as its historic centre.

2.7 We consider that Oxford should substantially reduce the number of sites it has identified for employment purposes and should reallocate that land for housing. It should also cooperate with surrounding Districts to embark on a strategy to encourage employment growth elsewhere in areas that need and would welcome it both in Oxfordshire and the country as a whole. By taking these actions its assessed unmet housing needs (grossly overestimated as they are) would be reduced further.

2.8 Cherwell has not satisfactorily worked with other Oxfordshire authorities and, in particular, Oxford City Council on the scale and location of sites allocated for employment purposes. This was evident from Cherwell's lack of participation at key stages in Oxford's Northern Gateway EiP, which we consider negligent. The 'knowledge based' or technology sites proposed in close proximity at Langford Lane Kidlington, Begbroke Science Park, the Northern Gateway and near Eynsham represent massive over-provision (given that other well-established sites in the

county, such as Oxford Science Park, are still incomplete and far from fully occupied) and indicate a failure to co-operate effectively between the authorities concerned.

2.9 While the authorities point to the Oxford Growth Board as evidence of co-operation, experience of organisations such as KDW suggest that this undemocratic body has not been transparent in its operation and has often had short or cancelled meetings. Genuine debate and co-operation do not appear to have occurred. Co-operation should be effective and more than a token process.

2.10 *Strategic Objective SO17.* We object to Strategic Objective SO17 because the “projected economic growth” referred to is overestimated for reasons given elsewhere in our representations. These projections of jobs growth are exaggerated in order to support funding bids from the Local Enterprise Partnership and represent wishful thinking. Furthermore, whether or not to plan for such a high level of economic growth is a choice that can be made by the individual councils. There is no reason for Cherwell to accept it and no reason for to accept the consequences of jobs growth that Oxford seeks to encourage within the City by reserving land for employment uses. Such jobs growth will create extra housing demand but does not address the fundamental housing need of either District or the need for housing to be more affordable. The actual ‘housing need’ of both authorities is much lower than identified in the SHMA as has now been made clear from the Government consultation “Planning for the right homes in the right places” (September 2017).

2.11 The Council (together with the other Councils) has overemphasised economic considerations at the expense of social and environmental considerations and the outcome of this would **not be consistent with achieving sustainable development**. The plan is **unsound**, because it is **not effective** in achieving sustainable development, **not justified** and **not positively prepared** because the development requirements are overestimated.

2.12 Change sought. The plan should be withdrawn and a co-ordinated, balanced and sustainable spatial strategy should be developed co-operatively by the Oxfordshire authorities.

2.13 Examination. We wish to participate. See response in paras 1.17 and 1.18, and Part A information.

Representation 3 of 10, (Part B form) from Kidlington Development Watch

3. Policy PR1 : “Achieving Sustainable Development for Oxford’s Needs” : the overall amount of housing proposed and the SHMA

3.1 Relevant Document and Part. Submission Plan, Policy PR1 (page 69) and all references to the Oxfordshire SHMA (e.g. pages 15-16, 19, 34-35, 43-44 and elsewhere)

3.2 Soundness and Compliance

We consider the plan unsound because it is not justified, not positively prepared, not effective and not compliant with national policy.

Reasons for Our Objection.

3.3 We object to the proposal for 4,400 homes in Cherwell to meet Oxford’s needs. The 4,400 figure is **not justified** because it is based on the discredited calculations of the Oxfordshire SHMA which have been heavily criticised since they were made public in early 2014 (see objections to the Local Plan Pt 1, including the report by Prof. A Wenban-Smith). We contend that these calculations suffer from numerous errors including projections of jobs growth that are exaggerated in order to support funding bids from the (unelected and unaccountable) Local Enterprise Partnership.

3.4 By relying on the full SHMA figures, the plan overemphasises economic considerations at the expense of social and environmental considerations and the outcome of this will be an unbalanced, **unsustainable** and **unsound** plan. By accepting the full figures without taking into account constraints such as Green Belt – as indicated by the NPPF - the plan is **not consistent with national policy and guidance**. The existence of Green Belt, as provided for in the NPPF, is a reason not to meet assessed need and the Council should have considered this in its assessment of alternatives.

3.5 The criticisms of the SHMA referred to above would appear to be borne out by the figures calculated using the proposed methodology In the recent (Sept 2017) Government consultation “Planning for the right homes in the right places”.

3.6 The method proposed by DCLG in the consultation, which includes uplifts to account for affordability, results in an annual housing need for Cherwell of 762 (compared with 1142 in the SHMA) and for Oxford City of 746 (compared with a range of 1200-1600 in the SHMA). We note that the Oxfordshire SHMA deemed that no uplift for economic growth was necessary for Oxford City even on the most optimistic scenario. The new DCLG figures indicate that the SHMA numbers for both Districts are excessive as we, and others, have consistently argued since they were published.

3.7 Oxford’s need and its ability to accommodate it, has not yet been tested through a local plan examination. Its local plan is under preparation and is due to be submitted in December 2018. The new DCLG method is intended to apply to plans submitted after March 2018, so should apply to Oxford’s local plan. It would clearly be premature for Cherwell to plan now to meet Oxford’s unmet need on the basis of

any number higher than 746 per annum. To plan for more would run the serious risks of over-allocating land and unnecessarily damaging the Green Belt.

3.8 Indeed, an examination of Oxford's proposals, taking into account the Council's overallocation of employment land, might conclude that Oxford is capable of accommodating all of its need for housing. Furthermore, as Cherwell's own provision in its approved Part 1 plan is considerably higher than the new DCLG figures, it may well be that Cherwell's approved plan will also require review in order to reduce its housing provision. We consider therefore that Cherwell's Partial Review is now clearly rendered premature because it is **not justified** and therefore unsound. Any consideration of it should be deferred until after the Inspector's report into Oxford's plan is available.

3.9 In further support of this we note that the proposed submission document quotes from the Pt1 Inspector's requirement to *"Add a formal commitment from the Council, together with other relevant Councils, to undertake a joint review of the boundaries of the Oxford Green Belt, once the specific level of help required by the city of Oxford to meet its needs that cannot reasonably be met within its present confines, is fully and accurately defined"* (para 1.20, p17). As outlined above, the "level of help" referred to has not yet been "fully and accurately defined" as required by the Inspector. It also cannot be appropriate for Cherwell to make substantial amendments to its Green Belt boundaries as proposed in this partial review, in advance of the joint review referred to by the Inspector. This plan is premature.

3.10 Changes sought. The plan should be withdrawn as premature pending the "full and accurate definition" of Oxford's needs, and its ability to meet them, taking into account the new methodology proposed by DCLG.

3.11 Examination. We wish to participate. See response in paras 1.17 and 1.18, and Part A information.

Representation 4 of 10, (Part B form) from Kidlington Development Watch

Policy PR1 : “Achieving Sustainable Development for Oxford’s Needs” – the proposed development is not sustainable.

4.1 Relevant document and section. Submission Plan, Policy PR1.

4.2 Soundness and Compliance. We consider the plan unsound because it is not justified, not positively prepared, not effective and not consistent with National Policy.

Reasons for Our Objection.

4.3 The Council’s definition of “Sustainable Development” is elastic. It means whatever the Council chooses it to mean. Interestingly it is not defined in the glossary. In policy PR1 the Council even chooses to say what is included in the definition “for the purpose of the Partial Review”. The use of the phrase in this plan is meaningless.

4.4 We object to the proposal for 4,400 houses in the Green Belt as it is **not sustainable** because it would mean that:

- traffic problems would get much worse (separate representation on PR4a)
- public services and other infrastructure would be even more stretched (see also separate representation on PR11)
- open countryside in the green belt, which is intended to be permanent, would be sacrificed for ever. Countryside walks and views would be lost to local residents in Kidlington, Begbroke and Yarnton who do not have the benefit of local parks, and for whom the countryside is currently a substitute.
- Natural habitats would be destroyed. The natural environment will be a major casualty. Loss of habitat and increased recreational use of the green spaces that remain will stress and endanger wildlife. We think that the Council’s contention that the development will result in a net increase in biodiversity is implausible and not supported by evidence.
- Environmental quality and quality of life for existing residents will suffer as air, noise and light pollution would increase

4.5 Changes sought. The plan should be withdrawn because it does not constitute sustainable development and is therefore unsound. A co-ordinated, balanced and sustainable spatial strategy should be developed co-operatively by the Oxfordshire authorities.

4.6 Examination. We wish to participate. See response in paras 1.17 and 1.18, and Part A information.

Representation 5 of 10, (Part B form) from Kidlington Development Watch

5. Policy PR3 The Oxford Green Belt

5.1 Relevant document and section. Submission Plan, Policy PR3.

5.2 Soundness and Compliance. We consider the plan unsound because it is not justified, not positively prepared, not effective and not consistent with National Policy.

Reasons for Our Objection.

5.3 We object strongly to the proposal to remove land from the Oxford Green Belt. The Green Belt around Kidlington is mainly pleasant and unspoilt countryside with many well-used footpaths and 'green spaces'. It is much appreciated and enjoyed by large numbers of local residents.

5.4 Kidlington does not have many green spaces within it, and no park, and the surrounding Green Belt helps to compensate for this. The Masterplan SPD notes that Kidlington's distinctive character is as a 'village set in the landscape' and specifically seeks to enhance that.

5.5 Kidlington Masterplan. The submission document does not sufficiently take into account the recently adopted Kidlington Masterplan SPD which is written on the basis that the surrounding Green Belt remains fundamentally unchanged. In particular we draw attention to the objective to strengthen Kidlington's distinctive character of a 'village set in the landscape' and the objective to 'protect and enhance Kidlington's landscape and biodiversity assets'.

5.6 Above all, the Green Belt exists to protect the historic city of Oxford from the effects of over-development as is acknowledged in the adopted Cherwell Local Plan. Government guidance states that Green Belt is a permanent designation and that the existence of Green Belt is a reason not to meet objectively assessed need in full. It also states that unmet housing need is not a reason for building in the Green Belt. Cherwell Council has made no allowance for this in the submission plan. All of the Green Belt around Kidlington contributes to the purposes set out in the NPPF as has been shown in local studies. Government guidance and Cherwell's existing policy to protect the Green Belt should be upheld.

5.7 As argued above, the pressure for release of Green Belt land for housing results from the City Council's apparent and damaging strategy of attempting to direct employment growth towards and within Oxford. There are alternatives such as a continuing strategy of dispersal as outlined above. The city council could also do much more to meet housing needs within its own boundaries such as making better use of previously developed land in Oxford and using some protected employment sites in the city for housing instead.

5.8 Exceptional circumstances (para 5.17). We do not consider that exceptional circumstances for release of Green Belt have been demonstrated because (1) the 'unmet housing need' for Oxford has not been proved (2) nor has the inability of Oxford to meet its own needs and (3) realistic alternatives to building in the Green Belt exist.

5.9 Paragraph 5.41 implies that the Green Belt boundaries established by this plan are not necessarily intended to endure beyond the life of the plan. This is contrary to national planning policy (NPPF). It is also premature to make major changes to Green Belt boundaries, as proposed in this plan, prior to the joint Oxfordshire plan referred to in para 5.41.

5.10 Changes sought. Green Belt land should not be released. The real housing need for Oxford should be re-assessed as described earlier. An alternative spatial strategy should be established to protect the Green Belt and to protect Oxford from over-development. The plan should be withdrawn so that these matters can be addressed.

5.11 Examination. We wish to participate. See response in paras 1.17 and 1.18, and Part A information.

Representation 6 of 10, (Part B form) from Kidlington Development Watch

6. Policy PR4a Sustainable Transport

6.1 Relevant document and sections Submission Plan, Policy PR4a.

6.2 Soundness and Compliance

We consider the plan to be unsound because it is **unjustified** and **ineffective**.

Reasons for Our Objection.

6.3 The locations chosen for the 4,400 new houses are close to the most congested roads in Oxfordshire. The Local Transport Plan shows that all four roads meeting at the Peartree intersection are at or over capacity (LTP page 27, Figure 10). Anyone who travels in this area will confirm that there are long delays at peak times and often unpredictable delays at other times in this area. These high levels of traffic congestion are acknowledged in the plan and result in high levels of local air pollution.

6.4 In para 5.47 of the plan it is suggested that 4,400 new houses “would increase car journeys by 1.3-1.4%” also suggesting that this is a small change. This is a meaningless statement as it does not specify on which roads, over which area and at what times these journeys would occur. It is also based on data from 2013 which is clearly now out of date. Furthermore it, presumably, does not take into account additional traffic arising from the housing allocations in other Districts, from the substantial allocations made in Local Plan Pt 1, from the proposed development at the “Northern Gateway” and from possible regional or national highway projects.

6.5 Kidlington, Begbroke and Yarnton currently have around 8000 houses. Common sense suggests that an increase of 4,400 houses would result in an increase in car journeys in that area of over 50% (and certainly not 1.4%), without allowing for increases resulting from other development. A plan should surely be subject to a ‘sanity check’ such as this, and the fact that the statement in para 5.47 is included without any comment, justification or qualification suggests a serious lack of evidence and understanding. Indeed the plan goes on to say that “Our development strategy provides the opportunity to reduce this percentage” (para 5.47) without any explanation or justification. The plan is clearly **not justified**.

6.6 The Council’s proposed answer is Policy 4a “Sustainable Transport” by which developers of the allocated sites will be expected to contribute to highway and public transport improvements. Such improvements, largely for public transport, form a significant proportion of the projects listed in the infrastructure schedule. However, these have no costings or funding source attached. Private developers will also be expected to make contributions to utilities provision, public services, green infrastructure and affordable housing. Without information on costs it is impossible to say whether the transport projects can be afforded. The plan is **not justified**,

6.7 Very few of the proposed improvements are intended to cater for private vehicles such as cars, vans and lorries. The “sustainable transport policy” simply means expecting very large numbers of people to change their behaviour and cycle, walk or use the bus instead of their cars because of the public transport improvements

proposed.. However there is no analysis to give any confidence that the public transport improvements will even meet the extra demand generated by the new development let alone achieve significant modal shift away from private transport. Instead the explanatory text for this policy is dotted with words such as 'opportunity' and 'potential'. It is simply wishful thinking with no foundation.

6.8 Many journeys can only realistically be made by car and many modern developments such as retail parks rely on car use. Journeys by delivery and service vehicles will still be needed, as will freight traffic. Given the proposed 50% increase in population in this area, it is inevitable that journeys by private vehicles will increase significantly. Again no analysis is provided and no explanation of how increased journeys by private transport will be accommodated. As it stands this policy is **not justified** and **ineffective**.

6.9 While the proposed housing sites have been chosen for being close to Oxford, they are actually located at the other side of the city from two of its three major employment areas in Headington and Cowley (see plan : fig 6, p48). So, not only would journeys to these areas originate in an area which is one of the most congested in the county but also they would involve travel across the city, cutting across other congested routes to the centre. Whether these journeys would be made by public or private transport they would be longer, more difficult to provide for and give rise to more congestion than is necessary.

6.10 Finally and importantly, we do not consider that the transport improvements needed to support the additional development proposed can be achieved without considerable harm to the natural environment and to local air quality. The road network in this area already serves local, regional and national functions and already requires improvement to address existing capacity issues. Further investment should be confined to addressing these issues only.

6.11 Changes Sought: There is no reliable evidence that the proposed transport policy will support the proposed development, so the plan should be withdrawn. Further it is likely that the highway improvements needed will in themselves be damaging, so a different development strategy is needed. A realistic plan for overcoming existing problems in this area should be included within that strategy.

6.12 Examination. We wish to participate. See response in paras 1.17 and 1.18, and Part A information.

Representation 7 of 10, (Part B form) from Kidlington Development Watch

7. The allocations: Policies PR6a, 6b,7a,7b,8,9 and 10

7.1 Relevant document and sections Submission Plan, Policies PR6a, 6b,7a,7b,8,9 and 10 (pages 87 -143)

7.2 Soundness and Compliance We consider the plan unsound because it is not justified, not positively prepared, not effective and not consistent with National Policy.

Reasons for Our Representation.

7.3 Green Belt Allocations. We object to the allocations in Policies PR6a, 6b,7a,7b,8 and 9 for the reasons given in our objection to release of Green Belt land (see objection to PR3). All of these sites contribute to the purposes of the Green Belt and should not therefore be removed from it.

7.4 Other Green Belt Sites rejected by the Council. We also explicitly support the Council's rejection of other sites in the Green Belt considered at the options stage for the same reasons.

7.5 Policy 10 : Woodstock Allocation. In the case of Policy 10, the site is on the edge of the Green Belt, and would impact on its openness. It would also be an excessive and disproportionate extension to the small historic town of Woodstock particularly when considered in addition to the adjacent site provisionally allocated in the draft West Oxfordshire Local Plan (currently under examination) for 300 houses. Due to wide-spread concerns raised at the hearings, the Inspector has asked West Oxfordshire District Council to conduct a heritage impact assessment of this site given its proximity to a World Heritage site. Cherwell should have conducted a similar assessment, taking into account the cumulative impact of the proposed development. Woodstock town is not within the Cherwell boundary but nevertheless, Cherwell has a duty to seek to protect historic Woodstock from inappropriate development and we consider it is not reasonable or sustainable to locate 410 extra houses in this area to meet Oxford's unmet housing needs.

7.6 Changes Sought.

All allocations should be withdrawn because they are premature (need has not been established) and because alternatives to Green Belt development exist.

7.7 Examination. We wish to participate. See response in paras 1.17 and 1.18, and Part A information.

Representation 8 of 10, (Part B form) from Kidlington Development Watch

8. Land areas for residential development in the allocations are inconsistent with density and number of houses specified.

8.1 Relevant document and sections Submission Plan, Policies PR6a, 6b,7a, 8, and 10 (pages 87-143). Also Policy 12a.

8.2 Soundness and Compliance We consider the plan unsound because it is not justified and not effective.

Reasons for Our objection.

8.3 While we object to any release of land in the Green Belt including the allocated sites, we have a further concern relating to the possible overallocation of land for housing in the event that any or all of the allocated sites are confirmed for development in any adopted plan.

8.4 In the case of policies PR6a, 6b, 7a, and 8, the land areas allocated specifically for residential development (i.e. not the total site areas) are approximately 50% higher than would be necessary to accommodate the stated number of houses at the net densities specified. For example the largest site (PR8) for 1950 houses at 45dpha net should require 43.3ha. whereas the allocation is for 66ha, over 50% larger.

8.5 The definition of net density is not specified in the plan though it usually includes access roads, parking, incidental open space and play areas. There are separate allocations for schools and a local centre, so it appears that the areas allocated specifically for residential development are significantly too large.

8.6 Given the desirability of this land to developers, there is a clear risk that permission could be sought for significantly higher numbers of dwellings over and above the intended provision, resulting in even greater environmental harm and pressure on infrastructure. We are therefore concerned about the provision in Policy 12a (para 7) that should more than 4400 houses be built this will be taken into account in meeting Cherwell's own need, which would appear to be an incentive to the Council to approve higher numbers than set out in this plan.

Changes Sought.

8.7 All allocations should be withdrawn because they are premature (need not yet established) and because alternatives to Green Belt development exist.

8.8 However if some or all of the allocations are confirmed (which we completely oppose) then the plan should be amended to ensure that no more than the specified numbers of houses will be permitted (e.g. by reducing site areas or other stipulations).

8.9 Examination. We wish to participate. See response in paras 1.17 and 1.18, and Part A information.

Representation 9 of 10, (Part B form) from Kidlington Development Watch

9. Policy PR11 Infrastructure Delivery

9.1 Relevant Documents and Sections: Submission Plan, Policy PR11 and Infrastructure Schedule, Appendix 4)

9.2 Soundness and Compliance. We consider the plan **unsound and not justified, not positively prepared and not effective.**

Reasons for Our Objection.

9.3 We object to Policy PR11 on infrastructure because it only sets out “an approach” (“The Council’s approach to infrastructure planning .. will be...”). It is not therefore a policy and is simply wishful thinking.

9.4 In the associated infrastructure schedule (Appendix 4, pages 165-182) the column for costs contains the letters TBC in every case. In most cases the column for source of funding also contains these letters and in the small minority of cases where a source is identified it is most often “private developers”. This lack of information means that it is impossible to have any confidence that the identified infrastructure needs can be provided.

9.5 Additionally, no projects are identified to improve the already congested highway network for private vehicles and no indication of how the network will cope with the additional vehicles owned by the occupiers of these new houses and the other developments planned for the area. The plan appears to deny people the opportunity to use their cars and relies wholly on people using public transport, cycling and walking.

9.6 We also consider that some of the infrastructure required to support the proposed level of growth together with the growth elsewhere around Oxford would in itself be harmful to the environment which is a further reason why the proposed growth is not sustainable.

9.7 We refer to the plan’s quote (p146) from the Oxfordshire Infrastructure Strategy that “growth in recent decades has created a deficit in existing infrastructure”. We agree and suggest that it would be foolhardy to embark on the proposed programme of development as it will increase this deficit. This makes the plan **not positively prepared**. Any plan for the area should concentrate on alleviating the acknowledged existing infrastructure deficit.

9.8 Policy PR11 and its associated Infrastructure Schedule is **unsound** because it is manifestly **unjustified** (uncosted and unfunded), **not positively prepared** because the infrastructure requirements are inadequate and therefore **not effective**.

9.9 Changes Sought.. The plan should be withdrawn. A proper infrastructure plan and schedule should be drawn up to overcome existing problems

9.10 Examination. We wish to participate. See response in paras 1.17 and 1.18, and Part A information.

Representation 10 of 10, (Part B form) from Kidlington Development Watch

10. Policy PR12b

10.1 Relevant document and sections Submission Plan, Policy PR12b

10.2 Soundness and Compliance We consider the plan potentially unsound because Policy 12b is not effective and not consistent with National Policy.

Reasons for Our Representation.

10.3 Firstly, we repeat our support for the Council's rejection of all Green Belt sites proposed at the options stage (and that are not proposed to be allocated in the draft submission plan).

10.4 However, we are unclear about the purpose of Policy 12b in relation to sites within the Green Belt, which constitute most of the sites that were considered and rejected at the options stage. It seems to us that a Green Belt site should never be supported for development precisely because it is in the Green Belt and regardless of the qualifications given in clauses 1 to 5 of the proposed policy. Permitting such development would be contrary to planning guidance which states that unmet housing need does not constitute very special circumstances for building in the Green Belt.

10.5 We assume that it is not suggested that such sites would first be removed from the Green Belt as this would contravene guidance that Green Belt boundaries should only and exceptionally be reviewed as part of Local Plan preparation and that boundaries are intended to endure beyond the lifetime of a plan.

10.6 Changes Sought.

The potential ambiguity in this policy should be removed. While we do not accept that any of the proposed allocations are justified, this policy should make clear that no development would be permitted on Green Belt sites that are not allocated in the partial review.

10.7 Examination. We wish to participate. See response in paras 1.17 and 1.18, and Part A information.
