

Appendix 3

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

The Proposed Submission Documents are available for inspection and comment from Monday 17 July 2017 to 5pm on Tuesday 29 August 2017.

The documents are available online at www.cherwell.gov.uk/planningpolicyconsultation and at the locations specified in the Statement of Representations Procedure.

How to use this form

Please refer to the accompanying Guidance Notes.

Please complete **Part A** in full.

Then complete **Part B** for each part of the document you wish to comment on.

As well as the proposed Local Plan (Partial Review) this form can also be used to comment on the Sustainability Appraisal and other supporting documents.

PLEASE NOTE THAT ANONYMOUS OR CONFIDENTIAL COMMENTS CANNOT BE ACCEPTED. YOUR NAME AND COMMENTS WILL BE PUBLISHED WHEN THE CONSULTATION IS COMPLETE, BUT PERSONAL INFORMATION (SUCH AS YOUR ADDRESS OR EMAIL ADDRESS) WILL REMAIN CONFIDENTIAL.

Please return completed forms:

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

Or by post to: Planning Policy Consultation, Planning Policy Team, Strategic Planning and the Economy, Cherwell District Council, Bodicote House, Bodicote, Banbury, OX15 4AA.

If you have any questions about completing the form, please telephone 01295 227985.

Your details will be added to our mailing list which means that you will be automatically notified of the submission of the local plan for independent examination, of the publication of the recommendations of the person appointed to carry out the examination, and of the adoption of the local plan. If you subsequently wish to be removed from our mailing list please contact us.

PART A

	Details of the person / body making the comments	Details of the agent submitting the comments on behalf of another person / body (if applicable)
Title	Mr	
First Name	Giles	
Last Name	Hughes	
Job Title (where relevant)	Head of Planning & Strategic Housing	
Organisation (where relevant)	West Oxfordshire District Council	
E-mail Address	giles.hughes@westoxon.gov.uk	
Postal Address	West Oxfordshire District Council Elmfield New Yatt Road Witney	
Post Code	OX28 1PB	
Telephone Number (optional)	01993 861000	

Please state how many Part B forms are submitted with this representation

PART B – Please complete a separate Part B form for each part of the document you wish to comment on	
Name <i>(to ensure the comments are correctly recorded from each form)</i>	West Oxfordshire District Council

1. To which document does this representation relate?

Proposed Submission Plan	YES
Policies Map within the Plan	PLEASE SELECT
Sustainability Appraisal Report	PLEASE SELECT
Other Document <i>(please specify)</i>	

2. To which part of the document does this representation relate?

Paragraph <i>(please specify)</i>	4.1 Vision for Meeting Oxford's Unmet Housing Needs in Cherwell
Policy <i>(please specify)</i>	
Table <i>(please specify)</i>	
Appendix <i>(please specify)</i>	
Other reference in document <i>(please specify)</i>	

3. Do you consider the Proposed Submission Plan to be:

Legally & Procedurally Compliant?	YES
Compliant with the Duty to Cooperate?	YES
<i>The 'tests' of Soundness:</i>	
Positively Prepared	YES
Justified	YES
Effective	YES
Consistent with National Policy	YES

4. Please provide the reasons if you have selected 'NO' to any part of Question 3 and consider the Plan to be uncompliant and/or unsound. Please make reference to the part of the document you have identified. Alternatively, please explain why you consider the Plan to be compliant and/or sound.

Support for Cherwell District Council's positive steps in taking forward a Local Plan review to help address Oxford City's unmet housing need.

It is important to consider the relationship of sites with Oxford and consider how well they contribute to helping meet Oxford's needs.

The Vision is an appropriate vision in principle and sets out a range of important factors.

(Continue on separate sheet if necessary)

5. Please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. Please provide any suggested wording or re-wording you consider necessary.

No changes to the Vision.

(Continue on separate sheet if necessary)

6. If you are seeking a change to the Plan, do you wish to express an interest to participate in the Examination?

I wish to participate at the oral examination	YES
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7. If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary:

To address cross-boundary issues with West Oxfordshire

(Continue on separate sheet if necessary)

Please note: *the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the Examination.*

PLEASE RETURN THIS FORM BY 5PM ON TUESDAY 29 AUGUST 2017 BY EMAIL TO:

PlanningPolicyConsultation@cherwell-dc.gov.uk

ALTERNATIVELY PLEASE SEND BY POST TO:

**Planning Policy Consultation
Planning Policy Team
Strategic Planning and the Economy
Cherwell District Council
Bodicote House
Bodicote
Banbury
OX15 4AA**

PART B – Please complete a separate Part B form for each part of the document you wish to comment on	
Name <i>(to ensure the comments are correctly recorded from each form)</i>	West Oxfordshire District Council

1. To which document does this representation relate?

Proposed Submission Plan	YES
Policies Map within the Plan	PLEASE SELECT
Sustainability Appraisal Report	PLEASE SELECT
Other Document <i>(please specify)</i>	

2. To which part of the document does this representation relate?

Paragraph <i>(please specify)</i>	Strategic Objectives SO16, SO17, SO18, SO19
Policy <i>(please specify)</i>	
Table <i>(please specify)</i>	
Appendix <i>(please specify)</i>	
Other reference in document <i>(please specify)</i>	

3. Do you consider the Proposed Submission Plan to be:

Legally & Procedurally Compliant?	YES
Compliant with the Duty to Cooperate?	YES
<i>The 'tests' of Soundness:</i>	
Positively Prepared	YES
Justified	YES
Effective	YES
Consistent with National Policy	YES

4. Please provide the reasons if you have selected 'NO' to any part of Question 3 and consider the Plan to be uncompliant and/or unsound. Please make reference to the part of the document you have identified. Alternatively, please explain why you consider the Plan to be compliant and/or sound.

Support for Cherwell District Council's positive steps in taking forward a Local Plan review to help address Oxford City's unmet housing need.

The Strategic Objectives rightly recognise the need for Cherwell to work in partnership with other authorities in delivering Oxford's unmet housing needs. They also rightly recognise the need for transport improvements.

(Continue on separate sheet if necessary)

5. Please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. Please provide any suggested wording or re-wording you consider necessary.

No changes to the Strategic Objectives.

(Continue on separate sheet if necessary)

6. If you are seeking a change to the Plan, do you wish to express an interest to participate in the Examination?

I wish to participate at the oral examination	YES
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(Continue on separate sheet if necessary)

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Name <i>(to ensure the comments are correctly recorded from each form)</i>	West Oxfordshire District Council

1. To which document does this representation relate?

Proposed Submission Plan	YES
Policies Map within the Plan	PLEASE SELECT
Sustainability Appraisal Report	PLEASE SELECT
Other Document <i>(please specify)</i>	

2. To which part of the document does this representation relate?

Paragraph <i>(please specify)</i>	Click here to enter text.
Policy <i>(please specify)</i>	PR3: The Oxford Green Belt
Table <i>(please specify)</i>	
Appendix <i>(please specify)</i>	
Other reference in document <i>(please specify)</i>	

3. Do you consider the Proposed Submission Plan to be:

Legally & Procedurally Compliant?	YES
Compliant with the Duty to Cooperate?	YES
<i>The ‘tests’ of Soundness:</i>	
Positively Prepared	YES
Justified	YES
Effective	YES
Consistent with National Policy	YES

4. Please provide the reasons if you have selected 'NO' to any part of Question 3 and consider the Plan to be uncompliant and/or unsound. Please make reference to the part of the document you have identified. Alternatively, please explain why you consider the Plan to be compliant and/or sound.

Support for Policy PR3. Exceptional circumstances have been demonstrated to justify the release of sites from the Green Belt, including sites for housing to help meet Oxford City's unmet housing needs, and sites for necessary transport infrastructure.

It is clear from the evidence base for Cherwell's proposed submission plan and from the Oxfordshire Growth Board evidence base that the release of sites from the Green Belt is necessary to deliver the scale of housing required in a sustainable manner.

It is important to consider the relationship of sites with Oxford and consider how well they contribute to helping meet Oxford's needs. The proposed housing sites to be released from the Green Belt relate well to Oxford and to proposed or existing transport infrastructure.

5. Please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. Please provide any suggested wording or re-wording you consider necessary.

No changes to the list of sites that are proposed to be released from the Green Belt.

(Continue on separate sheet if necessary)

6. If you are seeking a change to the Plan, do you wish to express an interest to participate in the Examination?

I wish to participate at the oral examination	YES
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7. If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary:

To address cross-boundary issues with West Oxfordshire

(Continue on separate sheet if necessary)

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Name <i>(to ensure the comments are correctly recorded from each form)</i>	West Oxfordshire District Council
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1. To which document does this representation relate?

Proposed Submission Plan	YES
Policies Map within the Plan	PLEASE SELECT
Sustainability Appraisal Report	PLEASE SELECT
Other Document <i>(please specify)</i>	

2. To which part of the document does this representation relate?

Paragraph <i>(please specify)</i>	Click here to enter text.
Policy <i>(please specify)</i>	PR4a: Sustainable Transport
Table <i>(please specify)</i>	
Appendix <i>(please specify)</i>	
Other reference in document <i>(please specify)</i>	

3. Do you consider the Proposed Submission Plan to be:

Legally & Procedurally Compliant?	YES
Compliant with the Duty to Cooperate?	YES
<i>The ‘tests’ of Soundness:</i>	
Positively Prepared	YES
Justified	YES
Effective	NO
Consistent with National Policy	YES

4. Please provide the reasons if you have selected ‘NO’ to any part of Question 3 and consider the Plan to be uncompliant and/or unsound. Please make reference to the part of the document you have identified. Alternatively, please explain why you consider the Plan to be compliant and/or sound.

Transport and infrastructure are key issues and growth in Cherwell needs to be looked at cumulatively with growth in West Oxfordshire.

The two local planning authorities share the A44 corridor, and this together with the A40 feeds into the congested Wolvercote roundabout. Growth in Cherwell and West Oxfordshire may have implications for northern Oxford and for the A34. The impact on the A44 corridor needs to be carefully considered, and it is vital that both districts work together with the County Council to bring forward the proposed A40/A44 link.

The two Councils should work together on the delivery of their Infrastructure Delivery Plans.

Policy PR4a provides an appropriate framework for this to happen. Agree with the expectation that strategic developments will be expected to provide proportionate financial contributions towards necessary infrastructure and services.

5. Please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. Please provide any suggested wording or re-wording you consider necessary.

It would be helpful to have recognition of some of the wider transport improvements required in the proposed policy. For example the proposed A40 A40 link.

(Continue on separate sheet if necessary)

6. If you are seeking a change to the Plan, do you wish to express an interest to participate in the Examination?

I wish to participate at the oral examination	YES
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7. If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary:

To address cross-boundary issues with West Oxfordshire

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Name <i>(to ensure the comments are correctly recorded from each form)</i>	West Oxfordshire District Council

1. To which document does this representation relate?

Proposed Submission Plan	YES
Policies Map within the Plan	PLEASE SELECT
Sustainability Appraisal Report	PLEASE SELECT
Other Document <i>(please specify)</i>	

2. To which part of the document does this representation relate?

Paragraph <i>(please specify)</i>	Click here to enter text.
Policy <i>(please specify)</i>	PR6a - Land East of Oxford Road PR6b - Land West of Oxford Road PR7a - Land South East of Kidlington PR7b - Land at Stratfield Farm PR8 - Land East of the A44 PR9 - Land West of Yarnton
Table <i>(please specify)</i>	
Appendix <i>(please specify)</i>	
Other reference in document <i>(please specify)</i>	

3. Do you consider the Proposed Submission Plan to be:

Legally & Procedurally Compliant?	YES
Compliant with the Duty to Cooperate?	YES
<i>The 'tests' of Soundness:</i>	
Positively Prepared	YES
Justified	NO

Effective	NO
Consistent with National Policy	NO

4. Please provide the reasons if you have selected ‘NO’ to any part of Question 3 and consider the Plan to be uncompliant and/or unsound. Please make reference to the part of the document you have identified. Alternatively, please explain why you consider the Plan to be compliant and/or sound.

Exceptional circumstances have been demonstrated to justify the release of sites from the Green Belt, including sites for housing to help meet Oxford City's unmet housing needs.

It is clear from the evidence base for Cherwell's proposed submission plan and from the Oxfordshire Growth Board evidence base that the release of sites from the Green Belt is necessary to deliver the scale of housing required in a sustainable manner.

However, there is a need to make efficient use of land released from the Green Belt for housing purposes. Some of the proposed densities on sites released from the Green Belt do not appear to make efficient use of this land despite their close proximity to Oxford and to sustainable transport infrastructure and services.

5. Please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. Please provide any suggested wording or re-wording you consider necessary.

Review of the proposed densities and the resulating site capacities of the housing sites to be released from the Green Belt in order to ensure that efficient use is made of this scarce land resource.

(Continue on separate sheet if necessary)

6. If you are seeking a change to the Plan, do you wish to express an interest to participate in the Examination?

I wish to participate at the oral examination	YES
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Name <i>(to ensure the comments are correctly recorded from each form)</i>	West Oxfordshire District Council

1. To which document does this representation relate?

Proposed Submission Plan	YES
Policies Map within the Plan	YES
Sustainability Appraisal Report	YES
Other Document <i>(please specify)</i>	Heritage and Landscape Assessment

2. To which part of the document does this representation relate?

Paragraph <i>(please specify)</i>	Click here to enter text.
Policy <i>(please specify)</i>	PR10 - Land South East of Woodstock
Table <i>(please specify)</i>	
Appendix <i>(please specify)</i>	
Other reference in document <i>(please specify)</i>	

3. Do you consider the Proposed Submission Plan to be:

Legally & Procedurally Compliant?	YES
Compliant with the Duty to Cooperate?	YES
<i>The 'tests' of Soundness:</i>	
Positively Prepared	YES
Justified	NO
Effective	NO
Consistent with National Policy	NO

4. Please provide the reasons if you have selected 'NO' to any part of Question 3 and consider the Plan to be non-compliant and/or unsound. Please make reference to the part of the document you have identified. Alternatively, please explain why you consider the Plan to be compliant and/or sound.

Concern over the impact of the proposed Woodstock urban extension, including the potential adverse effects on the settings of important heritage assets.

It is not clear that Cherwell have appropriately considered the cumulative impact of the proposed urban extension in combination with the proposals in the proposed West Oxfordshire Local Plan. The proposed West Oxfordshire Local Plan proposes 670 new homes on urban extension to Woodstock, including 300 homes to the immediate west of the Cherwell site which now have planning approval subject to a Section 106 agreement. The cumulative effects that need to be considered include the impact on the setting of the Blenheim Palace World Heritage Site. The site at present is a large open field, whose openness is readily apparent from the A44 as visitors travel towards Woodstock from the South, and this contributes to the setting of the World Heritage Site. A key issue to consider is the harm that the Cherwell proposal might cause in combination with the adjoining development in West Oxfordshire.

Another important issue is the impact of the proposal on the setting of the Blenheim Villa Scheduled Ancient Monument which is within the site itself. Although the SAM itself will be protected from residential development, the proposed housing area would represent a significant change to the landscape just to the north of the SAM thereby adversely affecting its setting.

There is a strong hedgerow feature on the western boundary of the site, which follows the alignment of a historic track. The proposed urban extension would breach this natural boundary and extend development in an incongruous 'finger' to the east. As such it would not relate well to the existing urban form of Woodstock in this area.

The proposed allocation is considered to cause harm to the settings of important heritage assets, it would also impact on the landscape and setting of Woodstock as a result of an incongruous urban extension which is poorly related to the characteristics of the location. The benefits of the proposed allocation do not outweigh these harms, given that there is scope to deliver housing to contribute towards Oxford's needs in alternative ways, such as through a modest increase in density on sites released from the Green Belt, or by the development of the site Policy PR3a, which is to be removed from the Green Belt but is not proposed for housing development in the proposed submission plan. More efficient use of the Green Belt sites could deliver at least 410 additional homes and therefore eliminate the need for the proposed Woodstock urban extension. As such the proposed allocation is contrary to the NPPF.

5. Please set out what change(s) you consider necessary to make the Local Plan legally compliant or sound. Please provide any suggested wording or re-wording you consider necessary.

Delete PR10 and the Woodstock allocation.

(Continue on separate sheet if necessary)

6. If you are seeking a change to the Plan, do you wish to express an interest to participate in the Examination?

I wish to participate at the oral examination	YES
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(Continue on separate sheet if necessary)

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