

PART B – Please complete a separate Part B form for each part of the document you wish to comment on	
Name (to ensure the comments are correctly recorded from each form)	Lynda Moore CPRE Oxfordshire

1. To which document does this representation relate?

Proposed Submission Plan	Yes (please delete)
Policies Map within the Plan	No (please delete)
Sustainability Appraisal Report	No (please delete)
Other Document (please specify)	

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

Paragraph (please specify)	
Policy (please specify)	Policy CSD 12: Biodiversity Net Gain
Table (please specify)	
Appendix (please specify)	
Other reference in document (please specify)	

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

Legally & Procedurally Compliant?	YES (please delete)
Compliant with the Duty to Cooperate?	YES (please delete)
The 'tests' of Soundness:	
Positively Prepared	NO (please delete)
Justified	NO (please delete)

Effective	NO (please delete)
Consistent with National Policy	YES (please delete)

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.

“Unless exemptions apply, development will be required to demonstrate a minimum of 10% net gain in biodiversity (measured using the DEFRA Statutory biodiversity metric) by protecting, enhancing and creating habitats of biodiversity value, in addition to recognising the wider benefits from natural capital and ecosystem services. At least 20% biodiversity net gain will be sought in the Nature Recovery Network Core and Recovery zones, and the strategic allocations in this Plan”

At least 20% BNG should be sought in development on **ALL SITES**, including windfall/unallocated sites to ensure consistency and a plan led approach to development

(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.

Reworded to include either a requirement of at least 20% BNG on
ALL SITES,
or include additionally development on **windfall/ unallocated sites**

(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 (please delete)

(Continue on separate sheet if necessary)

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

CPRE Oxfordshire have within our organisation experts across all fields in countryside protection. We have responded with several Part B forms in this area and consider we are best placed to voice areas of concern in relation to this top consultee priority

(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 11:59pm ON FRIDAY 14 FEBRUARY 2025 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**