



The countryside charity  
Oxfordshire

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Dear Planning Team,

### **Cherwell Local Plan reg 19 consultation – CPRE Oxfordshire Response**

CPRE Oxfordshire welcome the opportunity to respond to this consultation.

At an overall level, **CPRE Oxfordshire support the progression and approval of this Local Plan** to protect the countryside from the speculative development the district currently faces in the absence of a five year housing supply.

CPRE Oxfordshire have responded in detail as this Plan has progressed and we welcome that in many areas our views have been taken onboard and the Plan amended; we specifically highlight:

- The withdrawal of the Green Belt site on the Land Behind the Moors in Kidlington which we strongly opposed,
- the addition of the wording that new development should be delivered to the “*highest possible energy efficient standards*” in the vision
- the withdrawal of the phrase “*wherever possible*” in the strategy “*Minimise carbon emissions and achieve set net gains in biodiversity, in delivering new development.*”
- A 20% Biodiversity net gain target on all strategic development allocations within the plan.
- 17 Local Green spaces (LGS) in the latest Plan, up from 3 in the last Reg 18 consultation.

However, there are **a few key areas where CPRE Oxfordshire feel that the plan lacks soundness** as the proposals are not effective and **we seek amendment** in these areas. We have submitted Part B forms to raise these concerns, the primary of which are summarised below:

- CPRE Oxfordshire seek the extension of the 20% Biodiversity net gain target to ALL development, including any speculative, windfall and smaller non-strategic sites.



## Campaigning to protect our rural county

- Whilst CPRE Oxfordshire welcome the addition of further Local Green spaces we would like a review of all applications which have not been successful and the opportunity for them to be included. We believe there has been a failure in the application process, a lack of raising awareness of this opportunity and a lack of help and support for small communities in their applications. We consider that the fact that 15 of the 17 successful LGSs are in the Bicester area illustrates the lack of fairness in this process. We seek a full review of all unsuccessful applications and particularly highlight the LGS applications from Kidlington, Banbury Lane Nethercote and the need for all allotments sites to be given consideration.
- CPRE Oxfordshire seek a review of the assessment criteria for Settlement Hierarchy. CPRE challenges the classification criteria that has been introduced into reg 19 for category B villages. One of the overriding aims of the Local Plan is to reduce travel by private car. Therefore, for the purposes of the Local Plan geographical closeness should be defined as being within **ACCEPTABLE cycling and walking distance to a local town with a good range of facilities and services and with acceptable access to public transport**. We highlight in Part B forms settlements where the walk and cycle routes are not safe and acceptable, either as it involves a busy main road without a footpath or an unlit, uneven and overgrown footpath.
- New genuinely affordable homes are urgently needed within the district. CPRE Oxfordshire welcome that the Plan acknowledges that this takes the form of social rented housing. We seek tightening of wording in the Plan that **a minimum of 35% of all affordable accommodation will be social rented housing**. Applications where this is not considered viable by the developer should be rejected and this should be clearly stated.
- CPRE Oxfordshire have grave concerns over the provision of waste water for planned development. We seek a requirement that developers are required to contact the relevant sewage authority and OFWAT as early as possible to discuss their development proposals. Where there is a capacity constraint the Council, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered **ahead** of the occupation of the relevant phase of the development.
- CPRE Oxfordshire raise concerns over the large increase in employment sites within the district and seek assurances that this is deliverable and that sites approved in the interim period will reduce Plan numbers. We feel the Plan lacks detail and assurance that infrastructure will be in place to accommodate this. Additionally, the Plan should clearly state that a local need must be demonstrated for any unallocated employment sites.

CPRE Oxfordshire seek representation at the Inspectors hearing. We have within our organisation experts across all fields in countryside protection. We have responded with several Part B forms on countryside matters and consider we are best placed to voice areas of concern on this top consultee priority.



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Do contact us if there is any aspect of our response you wish to discuss.

Yours faithfully,

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