

Appendix 4: Table of detailed consultation responses to Cherwell District Council draft Plan

**Headline comments about the plan**

Some amendments need to be made to ensure wording is consistent with NPPF.

There is a lot of repetition and inconsistency in the draft plan, particularly in the policies for individual sites. Public transport, walking & cycling are picked up in some strategic development policies but not others; it may be more appropriate to create a separate policy for them to avoid repetition and to promote integration between travel modes.

The wider public transport network and sustainable transport links within the development towns need to be considered rather than only in terms of access to the individual strategic development sites – otherwise we will fail to appreciate the wider picture. The plan needs to acknowledge and include opportunities to improve the integration between modes, especially between walking, cycling and public transport in order to maximise journeys made by sustainable means.

All sites are capable of incorporating Sustainable Drainage Systems (SuDS).

In strategy and policy terms the County Council's Countryside Access Team supports the proposals in this document

We agree with references made to 'a new inner relief road within Banbury is being investigated' in 3<sup>rd</sup> para on page 11 – but this needs to be strengthened to take account of the town-wide Movement Strategy that is currently being progressed (i.e. it is about movement throughout the whole town, not just a specific piece of infrastructure).

There is great variability in the phrasing and detail of the policy statements regarding education. The text in Banbury 1 is very brief, Banbury 5 is very detailed and Banbury 3 seems the appropriate level of detail.

The Habitats Regulations Assessment and conclusions will need to be explained fully in the published plan.

**Officer comments**

Respondent	Comment
Strategic Planning Consultations	<p>1. <u>Use of forecasts:</u></p> <ul style="list-style-type: none"> <li>• What is the source of the district population projections (paras A14)? What assumptions are behind the figures?</li> <li>• What is the source of the district jobs forecasts (B.20)? Is this with or without additional employment land?</li> </ul> <p>2. <u>Housing Mix:</u></p> <p>a) Policy BSC 4 is unclear. It does not define the sizes of shared housing or ‘upsizing houses and flats’ in terms of numbers of bedrooms nor does it provide a split between 1 and 2 beds extra care units or define ‘other’. This information is needed to guide developers in producing policy compliant proposals and to enable service providers to understand who is likely to live in the new dwellings, the impact of their demands on local services and facilities and what additional new or improved supporting infrastructure would need to be provided.</p> <p>b) The approach taken in policy BSC 4 appears to be trying to fit the mix of new housing types and sizes to the mix of lifestages of new households. However there would be no means of enforcing who lives in ‘upsizing’ or ‘downsizing’ dwellings. For the purpose of service planning these types of dwellings would need to be treated in the same way as other non-specialist housing.</p> <p>c) The text in para B122 explains that planning should provide for more moderate sized family homes and downsizing homes. It is also important that the mix does not inhibit viable development. The district will need to be confident that the market will deliver their proposed mix.</p>

	<p>d) The provision of extra care housing is supported in principle</p> <p>3. <u>Meeting education needs:</u></p> <p>a) B 142: OCC has a statutory duty to ensure a sufficiency of school places.  b) UTC  c) Consideration could also be considered for the co-location of other services with schools to create community hubs</p> <p>4. <u>Public services and utilities:</u></p> <p>The County Council provides a number of social and community services which will be used by the residents of new housing; these include support for young people and families through services delivered from children’s centres and the Banbury and Bicester early Intervention hubs, day care for older people and people with learning disabilities, adult learning and registration.</p> <p>The County Council will work with the district council and their consultants to identify the impacts of new development on demands for Council provided services and any required new/ improvements to supporting infrastructure.</p> <p><u>Bicester</u></p> <p>5. C.26: the figure of 6,997 new homes 2011-31 does not tie up with the figure I the housing trajectory table (6,579). The NW Bicester development will be less than 30% complete.....some way to go before it enters its final phases</p> <p>6. The text should explain that in addition to providing on-site infrastructure set out in the specific site policies, the</p>
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proposed strategic development sites would be expected to contribute to strategic infrastructure that meets town-wide needs eg additional secondary school places, an enlarged/relocated library.

Policy Bicester 1 NW Bicester eco-town:

7. Place shaping principles should include 'schools at the heart of the community they serve.'

Banbury

8. Policy Banbury 5: North of Hanwell Fields. The number of primary school places required to serve the site will depend on the housing mix, tenure and build out rate of the development and whether there would be any spare capacity in existing schools. The policy should be changed to the same text in Banbury 3 ie 'Education – contributions will be required towards the expansion of existing primary schools.'

Kidlington:

9. Text for Kidlington falls into the later Villages section and the Kidlington specific section. This is confusing to the reader and in places repetitious. For clarity it should all be in one place in the document.
10. If there is to be a green belt review to meet a local need for employment land, it would be sensible to widen the area of search shown on the Kidlington proposals map to include land in the vicinity of Begbroke Science Park where a cluster of hi-tech university spin-outs is already established and there has been recent investment in road infrastructure.

Villages: Policy Villages 2

- a) It would be helpful for the plan to show how many houses had been built and were committed at March 2012 to provide understanding of how many other sites would need to be found within each group.
- b) Group 1: It may be sensible to consider splitting the group1 figure into two, with a figure for Launton and Ambrosden and a figure for the other four villages. There is currently considerable pressure for housing development in the villages close to Banbury. If current development proposals are successful it may leave little housing to be provided in the two larger sustainable villages close to Bicester, reducing choice in that area.

#### Infrastructure Delivery Plan

- 11. In principle I would support the definition of 'priority' and 'less critical' infrastructure items in para D9
- 12. The district's approach to infrastructure planning in policy INF1 is welcomed. The County Council would wish to work with the district council and their consultants in completing a full Infrastructure Delivery Plan.

#### Sustainability Appraisal

Section 3 of the draft SA report is in tabular form; the table provides a narrative on some of the positive and the negative impacts of each strategic site/policy. It would be useful if a more structured assessment were provided which shows how the strategic site/policy performs against each of the sustainability objectives, using the colour scoring system on page 5 of the document. This would have two advantages; it would enable a more rigorous assessment to be carried out and it would facilitate easier comparison between the options;

The sustainability objectives do not appear to assess the policies in the plan against the impact on flora, fauna or landscape; these are requirements which are specified in Annex 1 of the SEA Directive. Some references are made to biodiversity but only in a more general way;

The SA objectives refer to improving accessibility to all services and facilities and to reducing social exclusion. However, educational provision and the provision of extra care housing for the elderly are not included in the assessment, even

CA9

	<p>when some of the strategic sites policies specifically refer to them.</p> <p>BAN-1: The report notes that ‘businesses will be lost on the site, but it is anticipated that these will stay in the District’. Should the SA identify that there are limited opportunities for small businesses to stay in Banbury on the low rents they currently pay?</p> <p>BAN-2: Minor positive effects are identified with regards to biodiversity. I would question how there can be positive effects on biodiversity of building on green field sites, even if some habitat creation takes place.</p> <p>Paragraph 1.3 in the introduction states that the draft plan will summarise the results of the Habitats Regs Assessment (HRA) which addresses any potential significant effects of the plan on Oxford Meadows SAC, but I cannot find any reference to the HRA in this report. I wonder if it’s worth commenting in our response that the HRA could be a separate report from the SA as the requirements for consultation differ for the two assessments.</p>
<p>Business &amp; Skills Team</p>	<p>The plans for growing certain economic sectors make sense. They also fit well with our Skills Needs Analysis in terms of the sectors we are promoting for education providers to respond to. They are however a shift from the existing economic profile, so the challenge is to balance sector related training to the needs of the economy now and the needs of the future.</p> <p>The inclusion of the UTC may be unrealistic and other options should be considered.</p>
<p>Enterprise &amp; Innovation team</p>	<p>The economy section of the draft Plan should mention the Oxfordshire Local Enterprise Partnership, particularly related to Bicester. The town is one of the LEP’s three strategic locations and it would be good to make the connection in terms of economic development strategy and local planning.</p> <p>This is important in terms of the LEP’s focus on inward investment (through its Invest in Oxfordshire service) and business support for example – whilst the planning system can allocate employment land, it will be businesses moving into and starting up in Bicester (and Oxfordshire more generally) that will build and occupy the offices and industrial</p>

	<p>space and create the new private sector jobs. Furthermore, once the Local Transport Board is established, the LEP will have more of a say in the decision-making process around funding for transport infrastructure projects</p>
Social & Community Services	<p>The documents adequately refer to ECH, other retirement housing and generally to 'housing with care', the latter described on page 20. Indeed, if the intention of the local plan is to build close to 17k new homes and 7% of these include 'housing with care' (page 20 policy BSC 4) then this gives us c1,200 such units which will meet our ECH and other special needs requirements I believe.</p> <p>Each location has not been reviewed in detail but most of the strategic sites mentioned do refer to ECH inclusion and this is consistent with the council's local work with Cherwell where such sites have been identified for future schemes and have been submitted into provisional housing plans for the LIP.</p> <p>Whilst the overview of Cherwell draws attention to the high proportion of disabled adults, it does not mention its ageing population at all. Conversely, when it provides a housing needs overview it mentions the needs of elderly people but not disabled or other special housing need groups; this inconsistency needs to be addressed.</p> <p>OCC has reviewed special needs/disabled housing for adults in Cherwell and estimate a requirement for c120 such units by 2020, with a similar provision required for the next decade after that. This leaves a balance of c 900 units for ECH which seems broadly correct.</p>
Waste management	<p>The plan proposes a significant amount of residential development throughout the district and particularly at Banbury and Bicester, which will create additional demand at our Household Waste Recycling Centres (HWRCs). To meet this demand contributions from developers should be sought towards the provision of increased HWRC capacity and re-use facilities.</p> <p>This reference to re-use has been included as we are looking for opportunities to provide a network of facilities for re-use and repair, which could mean the provision of re-use facilities or shops at HWRCs or at other locations including through partnership projects with other organisations e.g. third sector or community projects. This will move waste up the waste management hierarchy and help meet the increased demand for facilities for the disposal of unwanted items from residents of new development. The re-use and repair facility proposed at Bicester (Bicester Re-use and Sustainable Living Centre) appears to be included in the Infrastructure Delivery Plan (IDP), and we support this.</p> <p>Generally we note and support the emphasis throughout the plan on sustainable development and developing a low carbon economy. In relation to achieving these aims at Bicester, the development of the energy from waste facility by Viridor, our residual waste treatment contractor, at Ardley provides an opportunity to investigate the potential for the use of combined heat and power (CHP) and the provision of heat to new residential and employment development. We note that policies ESD1 to ESD5 generally, and specifically policy ESD4, encourage this approach which we strongly support. The potential to provide CHP should be explored by potential developers with Viridor at the appropriate time and we are happy to assist if we are able and support liaison with Viridor.</p>

Community Safety, Fire & Rescue	<p>Currently the emergency cover requirements in the Cherwell district are appropriate to need, but are the subject of regular review, taking into account not only the proposed development of residential and commercial properties across the district but also the associated infrastructure development that could help to alleviate any potential response time pressures. In addition the following should be noted:</p> <p><b>Access for Firefighting:</b> Oxfordshire Fire &amp; Rescue Service (OFRS) assumes that access to the proposed sites and to the premises will be in accordance with the guidance in the current edition of Approved Document B to the Building Regulations volumes 1 &amp; 2.</p> <p><b>Water Supplies for Fire fighting:</b> We strongly recommend the provision of adequate and appropriate water supplies (fire hydrants) in accordance with the guidance in the current edition of Approved Document B to the Building Regulations volumes 1 &amp; 2. We would also recommend that the development conforms to British Standards BS 9999:2008 (Code of practice for fire safety in the design, management and use of buildings – Section 23 Water supplies for fire and rescue service use - 23.2 Location and access to external water supply) &amp; BS 9990 (Code of practice for non-automatic fire-fighting systems in buildings – Section 5, Private fire hydrants - 5.2 Provision and Siting)</p> <p><b>Automatic Water Suppression Systems:</b> Oxfordshire Fire and Rescue Service also believe that fitting of Automatic Water Suppression Systems (AWSS) will materially assist in the protection of life, property and fire fighter safety. AWSS such as sprinklers and water mist systems do save lives; therefore OFRS strongly recommend the provision of such systems particularly in new build properties for the proposed sites.</p> <p><b>Flood Management:</b> OFRS advise that planning developments will take into account the provisions of the Flood Management Act 2010.</p> <p><b>Emergency Response:</b> It should be acknowledged that proposed development in the plan may have an adverse effect on our emergency response times. This would be due to an envisaged increase in traffic which will potentially delay Retained Duty System Firefighters reaching their fire station and the subsequent mobilisation en-route to an incident.</p>
Archaeology	<p>The National Planning Policy Framework (NPPF) defines the purpose of planning as '<i>contributing to the achievement of sustainable development</i>' (NPPF 2012, paragraph 6). The framework goes on to add that '<i>There are three dimensions to sustainable development: economic, social and environmental</i>' and defines the economic role as '<i>contributing to protecting and enhancing our natural, built and historic environment</i>' (NPPF 2012, paragraph 7).</p> <p>The conservation of the historic environment is therefore an important part of achieving sustainable development and this should be reflected in local plans as stated in the NPPF '<i>Local planning authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment</i>' (NPPF Paragraph 126).</p> <p>In general the Local Plan does highlight the need to conserve the historic environment as part of sustainable</p>



development however there are a number of places where this could be clearer. The phrase ‘natural and built environment’ is used throughout the document and should be changed to the ‘natural, built and historic environment’ wherever it is used.

### **Section A. Strategy for Development in Cherwell**

#### **Our Vision for Cherwell District**

The vision for Cherwell states that ‘We will **ensure development is sustainable** by cherishing, protecting and enhancing our **distinctive natural** and **built environment.**’ This should also make reference to the historic environment, in line with the definition of sustainable development in the National Planning Policy Framework (paragraph 7).

The conservation of the historic environment should also be listed as one of the ‘Challenges and Objectives for Ensuring Sustainable Development’ and the phrase ‘built and natural environment’ should be changed to ‘built, natural and historic environment’.

The protection of the historic environment should therefore be regarded as a Strategic Objective and SO15 should be reworded to reflect the NPPF as suggested below.

**SO 15.** To protect and enhance the historic and natural environments and Cherwell's core assets, maximising opportunities for improving biodiversity and minimising pollution in urban and rural areas and seeking to protect and enhance both designated and undesignated heritage assets throughout the district.

### **Section B - Policies for Development in Cherwell**

**Policy SLE1: Employment Development** states that new, small scale, development proposals within rural areas will be supported if:

‘The proposal and any associated employment activities can be carried out without undue detriment to residential amenity, the highway network, village character, the appearance and character of the landscape and the environment generally including any buildings or features of designated importance’

Not all important heritage assets are designated and undesignated heritage assets that are ‘*demonstrably of equivalent significance to scheduled monuments, should be considered to be subject to the same policies for designated assets*’ (NPPF 139). This paragraph should therefore be changed to include important non-designated assets as well. The

phrase ‘any buildings or features’ should be replaced with ‘heritage assets as below.

*‘The proposal and any associated employment activities can be carried out without undue detriment to residential amenity, the highway network, village character, the appearance and character of the landscape and the environment generally including any heritage assets of designated importance or heritage assets of demonstrably equivalent significance’*

**Policy ESD16: The Character of the Built Environment** should be changed to ‘*The Character of the Built and Historic Environment*’. The policy itself does include measures to preserve sustain and enhance non designated assets however this does not fully reflect policies within NPPF. We would therefore recommend the follow wording.

Preserve, sustain and enhance designated, and non-designated ‘heritage assets’ of demonstrably equal significance, (as defined in the NPPF) including features, archaeology, areas and their settings, and ensure new development is sensitively sited and integrated. Proposals for development that affect non-designated historic assets will be considered taking account of the scale of any harm or loss and the significance of the heritage asset as set out in the NPPF.

### **Section C. Policies for Cherwell’s Places**

#### **C2 Bicester**

**Meeting the Challenge of Ensuring Sustainable Development in Bicester** states that one of the key environmental challenges facing Bicester is the character, appearance and setting of historic assets such as RAF Bicester and nearby villages. The Bicester area itself however contains a large number of heritage assets in the form of important below ground archaeological features including two scheduled ancient monuments. It is very likely that further important archaeological deposits are present within the area and this section should highlight the need for archaeological deposits to be taken into account as set out in the NPPF.

The Banbury’s ‘key environmental challenges’ section states that the plan will need to be ‘managing growth in a way that will not unacceptably harm important natural and historic assets’. This should also be included in the ‘key environmental challenges’ section for Bicester as well.

#### **Strategic Development: Bicester 1 - North West Bicester Eco-Town**

Preliminary geophysical surveys, undertaken on the site of the NW Bicester Eco Town, have indicated the presence of significant areas of archaeological deposits which may represent a substantial constraint to development in some areas of the site. These will potentially require changes to the overall Masterplan and the design of the development in order to

meet the requirements of the NPPF. These potential constraints should be highlighted within the Eco Town specific policies of the Local Plan under key site specific design and place shaping principles as they are shown for other strategic sites in Bicester.

We would recommend the following wording:

*An archaeological survey will be required due to heritage assets identified through geophysical survey. The Masterplan and subsequent development should allow the physical conservation of any heritage assets shown to be of demonstrably equal significance to designated assets.*

**Bicester 3: South West Bicester Phase 2.** A phased programme of archaeological investigation was undertaken during the first phase of this development which recorded a fairly large concentration of archaeological features. These include a Bronze Age barrow, requiring physical preservation in situ. These phased investigations did not investigate the area of the proposed phase 2 development and therefore there is the potential for further archaeological deposits to be encountered during any development. A phased programme will therefore also be required. It is possible that further archaeological deposits requiring physical preservation, as set out in the NPPF, may be encountered. The archaeological potential should therefore be noted in the Key Site Specific Design section of this plan as it has been for other strategic sites as shown above.

**Strategic Development: Bicester 11 – North East Bicester Business Park**

This site is located close to an area of identified archaeological features and an archaeological survey will be required to determine whether or not significant archaeological heritage assets are present on the site. We would therefore recommend that the following wording be added to the Key site specific design and place shaping principles section.

*An archaeological survey will be required due to heritage assets in the vicinity. The Masterplan and subsequent development should allow the physical conservation of any heritage assets shown to be of demonstrably equal significance to designated assets.*

**Strategic Development: Bicester 12 - East Bicester**

The deserted medieval village of Wretchwick consists of a series of earthworks and associated below ground archaeological remains, the majority of which is designated. There are also areas of important earthworks outside of the scheduling. The area of earthworks outside of the scheduled area may also be considered to be demonstrably equal significance to the scheduled area of the site and should therefore be considered to be subject to the same policies. This

could represent a major constraint to the development of this site. The area of the undesignated earthworks is currently in the area of planned development and it is possible that these earthworks may also require physical preservation in situ or further investigation. The Key site specific design and place shaping principles should also highlight the presence on important non-designated heritage assets within the site.

Surrounding the earthworks of the deserted medieval village are a number of fields containing associated ridge and furrow. These medieval and post medieval field systems are directly related to the designated village site and form an important part of its setting.

Given that parts of this area are scheduled, English Heritage will need to be consulted on any plans for this site in order to determine if there is a setting issue associated with any development within this site.

### **C3 Banbury**

Meeting the Challenge of Ensuring Sustainable Development in Banbury identifies that ‘managing growth in a way that will not unacceptably harm important natural and historic assets’. We are satisfied that this wording highlights the need to conserve and protect the historic environment and recommend that this wording be added as a key environmental challenge to all the policies for Cherwell’s places.

### **Strategic Development: Banbury 3 – West of Bretch Hill**

The key site specific design and place shaping principles for this site states that ‘development must respect the historic environment, including listed buildings (Withycombe Farmhouse, Drayton Arch and Park Farm Barns), Drayton Conservation Area and Wroxton Abbey parkland’. This should also be amended to include undesignated below ground archaeological deposits.

An archaeological survey will be required to determine whether or not significant archaeological heritage assets are present on the site. We would therefore recommend that the following wording be added to the Key site specific design and place shaping principles section.

*An archaeological survey will be required due to heritage assets in the vicinity. The Masterplan and subsequent development should allow the physical conservation of any heritage assets shown to be of demonstrably equal significance to designated assets.*

### **Strategic Development: Banbury 6 – Employment Land West of M40**

The Key site specific design and place shaping principles section states that 'An archaeological survey will be required due to close proximity to heritage assets'. An archaeological evaluation has already been undertaken on this site which recorded no archaeological features on the site. No further archaeological investigations will therefore be required for this site.

#### **Banbury 8 - Land at Bolton Road**

This site has the potential to encounter important surviving archaeological remains associated with the development of the medieval town. Any development will need to take into account surviving archaeological deposits which may require changes to the design of the development. There will be a requirement under NPPF for a desk based assessment followed by a trenched archaeological field evaluation to be submitted along with a planning application and this should be reflected in the key site specific design and place shaping principles for this site.

The Key place shaping section should therefore include the following wording:

*An archaeological survey will be required due to heritage assets identified through geophysical survey. The Masterplan and subsequent development should allow the physical conservation of any heritage assets shown to be of demonstrably equal significance to designated assets.*

#### **Strategic Development: Banbury 14 – Banbury Country Park**

This area has the potential for archaeological deposits to be present on the site which would be disturbed by the proposed tree planting and landscaping for this park.

The following wording should therefore be added to the Key site specific design:

*An archaeological survey will be required due to close proximity to heritage assets*

#### **C4. Our villages and Rural areas**

##### **Meeting the Challenge of Ensuring Sustainable Development in our villages & rural areas**

This section states that 'C.209 The major environmental challenge for our villages and rural areas is to maintain and enhance the quality of our natural, built and heritage.' This should be amended to 'enhance the quality of our natural, built and archaeological heritage'

#### **Cherwell Local Plan – Sustainability Appraisal: Archaeology comments**

**Box 2.1 Our Vision for Cherwell District**

The vision for Cherwell states that 'We will **ensure development is sustainable** by cherishing, protecting and enhancing our **distinctive natural** and **built environment**.' This should also make reference to the historic environment, in line with the definition of sustainable development in the National Planning Policy Framework (paragraph 7).

The conservation of the historic environment should also be listed as one of the 'Cherwell 'Local Plan Strategic Objectives' in Box 2.2 and SO15 should therefore be reworded to reflect the NPPF as suggested below.

**SO 15.** To protect and enhance the historic and natural environments and Cherwell's core assets, maximising opportunities for improving biodiversity and minimising pollution in urban and rural areas and seeking to protect and enhance both designated and undesignated heritage assets throughout the District.

**Table 5.1 - 10 Landscape and Historic Assets.**

This section should also include that the district contains around 1600 undesignated heritage assets recorded on the Historic Environment Record.

**Table 6.1: SA Framework.**

We are satisfied that the wording of SA Objective 12 is sufficient to assess the sustainability of development regarding the historic environment.

**Table 8.1: Results of the SA**

**Vision and Strategic Objectives:** We agree with the suggested change to the wording of this objective.

**BIC1 North West Bicester Eco-Development:** A geophysical survey has been undertaken on the site which has shown the area to contain significant archaeological deposits and therefore the archaeological potential of the site is considered to be high. What is not known at this stage is the significance of these archaeological deposits and this will only be understood once an archaeological field evaluation has been undertaken.

The mitigation section of the SA should therefore highlight the need for further archaeological surveys to assess the significance of these known archaeological features and to assess if further un-identified features survive on site.

**BIC2 Graven Hill:** This section highlights a minor positive effect on heritage assets improving the visual impact to the listed buildings however it neglects to mention the impact on development on the known archaeological features identified through geophysical survey. These features are not considered to represent a major constraint on the development but a phase of archaeological investigation will be required ahead of any development in order to reduce the negative effect on the historic environment. The mitigation section should therefore reflect this requirement.

**BIC 11 North East Bicester Business Park:** This site is located close to an area of identified archaeological features and an archaeological survey will be required to determine whether or not significant archaeological heritage assets are present on the site and therefore the potential effect of this proposal on the historic environment. This should be highlighted in the mitigation section.

**BIC 12 East Bicester:** The deserted medieval village of Wretchwick consists of a series of earthworks and associated below ground archaeological remains, the majority of which is designated. There are also areas of important earthworks outside of the scheduling. The area of earthworks outside of the scheduled area may also be considered to be demonstrably equal significance to the scheduled area of the site and should therefore be considered to be subject to the same policies. This could represent a major constraint to the development of this site.

Surrounding the earthworks of the deserted medieval village are a number of fields containing associated ridge and furrow. These medieval and post medieval field systems are directly related to the designated village site and form an important part of its setting.

The potential harm to the physical remains of this scheduled deserted medieval village, its associated earthworks and its setting could all represent a major negative impact as a result of this development and this should be highlighted in the Sustainability Appraisal.

**BAN 2 Hardwick Farm, Southam Road (East and West):** The SA makes no mention of the potential impact on the setting of the grade II\* listed building of Hardwick House and the earthwork remains of the deserted medieval village despite the close proximity of the development. It does however mention the setting of the crematorium which our records do not show as designated. These impacts should have been considered as a potential negative impact.

**BAN 6 Employment Land West of M40:** The mitigation section states that the policy should reference the potential

	<p>heritage asset and require archaeological investigation and recording. An archaeological evaluation has been undertaken on this site which did not record any archaeological features or deposits. There is no need for further archaeological investigations on this site.</p> <p>There are the remains of a World War 1 munitions factory immediately east of the site in Northamptonshire but no remains extend into the area shown on the Local Plan maps for this site.</p> <p><b>BAN 8 Land at Bolton Road:</b> This section seems to deal with the risk to standing buildings only. This area has high potential to encounter important surviving archaeological remains associated with the development of the medieval town. Any development will need to take into account surviving archaeological deposits which may require changes to the design of the development. There will be a requirement under NPPF for a desk based assessment followed by a trenched archaeological field evaluation to be submitted along with a planning application and this should be reflected in the SA.</p> <p><b>BAN 14a Banbury, Country Park:</b> The SA highlights a significant positive effect of this park on the historic environment. This area has, however, the potential for archaeological deposits to be present on the site which would be disturbed by the proposed tree planting and landscaping for this park. The SA should therefore consider the potential negative impact on below ground archaeological deposits. The mitigation section should therefore highlight the need for archaeological surveys to assess the potential for archaeological deposits to survive on the site and to identify the potential effects of this proposal on the historic environment.</p> <p>As a result of these issues the potential impacts on the Historic Environment of the proposals within the Local Plan have not fully been assessed. The 'Potential cumulative effect' section should therefore be reassessed once these issues have been addressed.</p>
Ecology	<p>In general I support the overarching policies in the draft Local Plan in relation to biodiversity. However, I have concerns about some of the proposed strategic sites and the wording of the policies in relation to these sites. The proposed strategic sites include sites that appear ecologically sensitive and contain important and protected habitats and species, in particular:</p> <ul style="list-style-type: none"> <li>• Bicester 2 - Graven Hill</li> <li>• Bicester 8 - RAF Bicester</li> <li>• Bicester 12 - East Bicester</li> <li>• Bicester 10 - Bicester Gateway</li> <li>• Bicester 11 - North East Bicester Business Park</li> <li>• Banbury 5 – North of Hanwell Fields</li> </ul>



It is difficult to provide further comments on the sites at this time, because I do not have recent survey information.

### **General Comments**

In line with policy and legislation, it is important that potential negative impacts on biodiversity are minimised and biodiversity enhanced, including the retention of existing, and creation of new, robust networks of habitats. The District Council should take into account a range of biodiversity constraints including statutory wildlife sites such as SACs and SSSIs as well as protected species. Non-statutory Local Wildlife Sites should also be taken into account. UKBAP Priority Habitats/Species, or habitats/species of principal importance as listed in S41 of the NERC Act, are also a planning constraint along with ancient woodlands and networks of natural habitats.

Thames Valley Environmental Records Centre has already provided existing baseline information on many of these habitats/species and some survey information has been provided by site promoters. However, the Phase 1 surveys that were carried out at Options for Growth stage are no longer current and additional surveys are required.

In all developments, existing landscape and biodiversity features such as ditches, ponds, hedgerows, mature trees and woodland should be retained, protected and enhanced wherever possible.

All sites around Bicester should also have surveys carried out for the brown hairstreak butterfly (where there is suitable habitat present), as it is known to be present in the area.

Comments made by OCC Ecology in response to earlier consultations (Banbury and North Cherwell Site Allocations Issues and Options Papers published July/November 2006 and the 2008 and 2010 consultations) highlighted the protected sites (SAC, SSSI and CWS) and notable species within 500m of a proposed site for sites that were being considered at those stages. If an area was within 500m of a conservation target area, it was noted as an opportunity for biodiversity gain.

### **Opportunities**

In general, any development which is likely to impact on the existing biodiversity interest within a CTA, or on land which potentially allows for the expansion and linkage of existing habitats, should be strongly resisted. Detailed habitat surveys should be carried out to ensure development avoids damage to the existing resource and would not compromise existing wildlife corridor links.

The only CTA potentially affected by the draft Local Plan site allocations is the Ray CTA to the south-east of Bicester. BIC12 is partly within this CTA and careful consideration is required to ensure that the biodiversity integrity of this CTA is not compromised by this proposed development.

However, as long as the biodiversity integrity of the CTA is not damaged there may be the potential for enhancing the biodiversity interest of the CTA as a whole particularly in relation to the various UK BAP priority habitats/species which it supports.

There remains a potential concern about the hydrological impacts on designated sites and priority habitats in the Ray catchment to the south of Bicester and the District Council should also consider whether the hydrology (both water quantity and quality) at the Bicester Wetland Reserve Local Wildlife Site would be impacted by the proposed site allocations.

The following general enhancement measures were proposed by Thomson Ecology in their report “Banbury and North Cherwell Site Allocations: Desk Study and Extended Phase 1 Habitat Surveys” for Cherwell DC should be considered on any sites where development is proposed. Whilst the surveys themselves are now out of date, the advice on general enhancement measures still appears relevant:

- The replacement of any trees lost during development with new ones of native species. For enhancement, a greater number of trees should be replaced than the number lost.
- The use of hedgerows rather than walls or fences as boundaries around and within the site. Native shrub species such as hawthorn, blackthorn and elder should be used wherever possible.
- Appropriate management of hedgerows for wildlife should also be encouraged, such as cutting alternate sides each year outside the bird breeding season.
- The creation of ponds or other wetland areas planted with native species such as yellow-flag (*Iris pseudacorus*), frogbit (*Hydrocharis morsus-ranae*), flowering rush (*Butomus umbellatus*) and lesser spearwort (*Ranunculus flammula*). Ponds provide drinking and bathing water for birds and other species and can support a diversity of aquatic life.
- The creation of flower-rich lawns or meadows in preference to species-poor amenity grassland. A range of seed

	<p>mixes are commercially available containing a mixture of meadow grasses and wildflowers. These can be both highly attractive to residents or users of a site, plus support a diversity of invertebrate species which in turn provide food for birds and bats.</p> <ul style="list-style-type: none"> <li>• The installation of bird and bat boxes in appropriate places around the site. A range of designs are commercially available including special bird or bat 'bricks' which can be installed directly into the structure of a building. Alternatively, wooden or 'woodcrete' boxes can be positioned on trees, walls or other features. For birds, species-specific designs are available which could benefit species of conservation concern such as house sparrows, starlings, house martins and swifts.</li> </ul> <p>In addition, the following opportunities were identified for sites at that time known as CDA1 and CDA2 (most of this area now falls within BAN1 -Banbury Canalside):</p> <ul style="list-style-type: none"> <li>• <b>Replacement of artificial bank protection with bio-engineering</b> features such as willow-spiling, coia rolls or bundles of willow 'faggots'. These can all provide bank protection whilst giving a softer more 'natural' bank profile which can benefit riparian wildlife.</li> <li>• <b>Restoration of a meandering planform where the channel has been straightened.</b> This can be achieved via the removal and re-engineering of artificial bank protection using the techniques described above. Putting bends back into the river recreates a sinuous planform and increases the diversity of habitats, including pools, riffles and bars.</li> <li>• <b>Creation of artificial habitats aimed at supporting species of conservation concern.</b> This could include the construction of an artificial otter holt, a vertical kingfisher nesting bank or gravel beds for fish spawning.</li> </ul> <p><b>Detailed Comments</b></p> <p><b>Summary</b></p> <p><b>0. Foreword &amp; Executive Summary</b></p> <ul style="list-style-type: none"> <li>• I support the aim to "achieve net gains in biodiversity" in the Executive Summary. This is in line with the NPPF (2012), South East Plan policy NRM4 and the Natural Environment &amp; Rural Communities (NERC) Act</li> </ul>
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### 3. Section A – Strategy for Development in Cherwell

- Support the need to address the key challenge of:  
*“Cherwell's biodiversity needs to be protected and enhanced and capable of adapting to a changing climate. There is need to support the management of existing woodlands and wildlife sites and to identify new wildlife sites. The reduction in nesting and roosting sites is a particular concern.”*
- I also support Strategic Objective SO 14:  
*“To protect and enhance the natural environment and Cherwell's core assets, maximising opportunities for improving biodiversity and minimising pollution in urban and rural areas.”*

### 4. Section B – Policies for Development in Cherwell

#### Policy BSC2: The Effective and Efficient Use of Land – Brownfield land and Housing Density

The supporting text includes:

*“Managing the use of previously developed land is important in maintaining the appearance of our towns and villages and to the well-being of our communities. It can also provide opportunities for enhancing biodiversity.”*

It should not be assumed that brownfield sites have a lower biodiversity value than greenfield. Some brownfield sites can have high biodiversity value and some greenfield can have low biodiversity value, especially those in intensive cultivation. This potential biodiversity value of brownfield sites is recognised in policy ESD10.

#### Policy BSC10: Open Space, Outdoor Sport and Recreation Provision

Support the inclusion of natural/semi-natural green space and standards of provision. Where possible Cherwell should also include biodiversity and wildlife features in other green space, such as amenity green space and green corridors e.g. planting with native and locally provenance species, installing bird and bat boxes on trees, etc.

Policy ESD1: Mitigating and Adapting to Climate Change

Support this policy, it being important to help maintain biodiversity in a changing climate.

Policy ESD3: Sustainable Construction

I support the requirement for Code Level 4 of the Code for Sustainable Homes. Methods for meeting this requirement can include biodiversity enhancement, green roofs, etc.

Policy ESD9: Protection of the Oxford Meadows SAC

Is this policy linked to a marked geographical boundary? I suggest that wording is included to show that this policy applies to any areas and developments that could potentially impact on Oxford Meadows and not just the SAC and adjacent sites. This is to minimise any potential for this policy to be overlooked at individual planning application stage.

Policy ESD10: Protection and Enhancement of Biodiversity and the Natural Environment

Support this policy with the exception of proposing additional wording to the 6<sup>th</sup> bullet point:

- *“A biodiversity survey and report will be required to accompany planning applications which may affect a site of known or potential ecological value **or the biodiversity / natural environment of the local area.**”*

This proposed additional wording is to make it clear that a biodiversity survey and report would be required even if the development isn't going to affect a SSSI or LWS, but could affect protected species or UK BAP priority habitat. This wording is already in the supporting text and needs to be included in the policy for continuity.

Will any further advice be provided on biodiversity enhancements? There appeared to be more information provided on enhancements in an earlier version of this policy (in 2010).

Policy ESD11: Conservation Target Areas

Conservation Target Area approach is an existing and successful approach and I support this policy. I suggest

that some wording is included to allow for the possibility of other means of biodiversity offsetting to be used within the plan period.

Policy ESD15: Green Boundaries to Growth

Suggest amended wording of the 3<sup>rd</sup> paragraph of this policy:

*“Green buffers will take the form of community woodland where the opportunity exists and when woodland planting is appropriate in landscape **and ecological** terms”*

The reason for the proposed additional wording is to ensure that woodland is not planted without first assessing whether the area and its geology already has existing, or high potential for, biodiversity value. For example, it would be inappropriate to plant woodland on an area of existing high quality of grassland. Has this assessment already been done on the areas proposed as Green Buffers?

The Green Buffers should be retained in perpetuity and management mechanisms put in place.

Policy ESD17: The Oxford Canal

I am concerned that this policy does not include reference to the need to protect and enhance biodiversity, although it does cross-reference to policies ESD10 and ESD18 in the supporting text.

The Oxford Canal contains important habitats and notable and protected species (including European Protected Species). This policy should be amended to ensure that harm to the biodiversity value of the Oxford Canal is avoided.

Policy ESD18: Green Infrastructure

Support this policy.

**Section C: Policies for Cherwell’s Places**

Page 5 of Section C - Support the recognition that one of the key environmental challenges facing Bicester is:

“

accommodating growth without having an adverse effect on the Oxford Meadows Special Area of Conservation

	<p>SACs are sites designated for European importance and it is essential that the plan does not harm the integrity of SACs.</p> <p>□ addressing deficiencies in 'green' infrastructure” Addressing this issue could impact on reducing deprivation, promoting healthy living and reducing obesity, in addition to producing a higher quality natural environment for residents, visitors and wildlife.</p> <p><b>Strategic Development: Bicester 1 – North West Bicester Eco-Town</b> Within the policy: “ – <i>Appropriate treatment of <del>protected</del> habitats and species on site, <b>particularly protected species and habitats</b>, and creation and management of new habitats to achieve an overall net gain in biodiversity” Suggest this is amended as above, as it is not only new habitats and protected species and habitats that should be treated appropriately, but also existing habitats and species.</i></p> <p>Does Code Level 6 already require high quality biodiversity mitigation, compensation and enhancement standards?</p> <p>The supporting text states that: “<i>Biodiversity projects will be incorporated as part of the Masterplanning process</i>” This does not appear to be referenced within the policy. Please insert reference to this in the policy.</p> <p><b>Strategic Development: Bicester 2 – Graven Hill</b> The Graven Hill Local Wildlife Site is within the site and is important that this is carefully managed and impacts of the development on the LWS are minimised e.g. to manage recreational pressure on the site. The supporting text refers to the wooded LWS being “...<i>opened up for public access providing recreational and health benefits (subject to careful management given the ecological value of the woodland and its designation as a Local Wildlife Site)</i>”</p> <p>The proposed site contains Great Crested Newts, a European Protected Species and reptiles which are UK protected species.</p> <p>The Graven Hill Local Wildlife Site is Ancient Woodland and there are records of a number of rare and notable species within the site including:</p> <ul style="list-style-type: none"> <li>• Willow Warbler</li> <li>• Common Grasshopper Warbler</li> <li>• Green Woodpecker</li> </ul>
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- Hoopoe
- Grizzled Skipper
- Bluebell

There would be disturbance to the LWS from new residents (and potentially existing residents from Bicester, as the site will become publically accessible). One of the main reasons for the wood's wildlife value is because it has been undisturbed for many years. Disturbance to populations of protected species (which will need to be translocated to undeveloped areas in the site) is also a concern.

The EU Habitats Directive (92/43/EEC) is implemented in the UK by the Conservation of Habitats & Species Regulations 2010. Local planning authorities have a statutory duty under Regulation 3(4) to have regard to the requirements of the Habitats Directive when considering an application in which European protected species may be affected. The Woolley ruling in 2010 highlighted the need for LPA's to discharge this duty correctly.

The species protection provisions of the Habitats Directive contain three 'derogation tests' which must be applied by Natural England when deciding whether to grant a licence for an activity that would otherwise lead to an offence under the Habitat Regulations. This licence is usually obtained after planning permission has been granted. The Woolley ruling made it clear that the LPA must also apply these three tests when determining a planning application, or be in breach of the Habitat Regulations. The three tests are:

- the activity must be for imperative reasons of overriding public interest (including those of a social or economic nature) or for public health and safety.
- there must be no satisfactory alternative.
- the favourable conservation status of the species must be maintained.

If it is uncertain as to whether or not a licence would be granted by Natural England, then planning permission must be refused.

There is also an issue of isolation of the LWS and protected species (bats, GCN, reptiles) – which is hard to mitigate given the location.

If Bicester 2 is developed there should be an overarching ecological strategy for the site to ensure mitigation and compensation can be effectively implemented at this ecologically sensitive site.



	<p>Outside of the LWS and within the proposed development area there are UK Biodiversity Action Plan Habitats, including:</p> <ul style="list-style-type: none"> <li>• Broadleaved woodland</li> <li>• Dense/continuous scrub</li> <li>• Coniferous woodland</li> </ul> <p>Bicester Wetland Reserve Local Wildlife Site (located between Bicester 10, 4 and Bicester 2) contains many rare and notable species. The site is particularly noted for its bird interest and is a Banbury Ornithological Society reserve. UK Biodiversity Action Plan habitat of CF1: Coastal and floodplain grazing marsh. It is important that the water quality and quantity is not impacted by development (at 10, 4 or 2, or in combination) and that indirect impacts are assessed to ensure that this area is not adversely affected e.g. recreational disturbance, noise, etc. The cumulative impact of development proposed at Bicester 2, 4 and 10 should be assessed, including the potential isolation of the LWS and disruption to the wildlife using the site.</p> <p>Bicester 2 also appears to include land to the north east of the B4100. The impact on the River Ray Conservation Target Area must be assessed and must not harm the integrity of the ecology of this area.</p> <p><b>Strategic Development: Bicester 3 – South West Bicester Phase 2</b></p> <p>The supporting text says that the site has “relatively low ecological value other than that provided by a small number of hedgerows and trees”. From the records available to me at this time this appears to be correct, although I have not received a recent ecological survey. Species recorded to the south-east and south-south-east outside the boundaries of the site include rare and notable butterflies (Small Heath, Grizzled Skipper, Wall, White-letter Hairstreak and Small Blue) and grass snake (UK Protected Species) and Barn Owl (protected under Schedule 1 of Wildlife &amp; Countryside Act 1981 (as amended)), have also been recorded in the area.</p> <p><b>Strategic Development: Bicester 4 – Bicester Business Park</b> Permission has already been granted for a business park in this location.</p> <p><b>Strategic Development: Bicester 5 – Strengthening Bicester Town Centre</b> Opportunities to protect and enhance biodiversity should be incorporated within the redevelopment. <b>Opportunities should be pursued for:</b></p> <ul style="list-style-type: none"> <li>• Green infrastructure e.g. street trees (can also help to provide shade in summer and a good environment for</li> </ul>
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residents, visitors and wildlife), green roofs & walls, hedgerows, wildflower grassland verges.

- Sustainable Urban Drainage Systems - choose biodiverse options e.g. swales & ponds where appropriate
- Biodiversity in buildings e.g. swift bricks/ boxes (Swifts are present in this area and are an Amber list Bird of Conservation Concern), bat bricks/ boxes, roof spaces designed for bats, green roofs & walls

**Strategic Development: Bicester 6 – Bure Place Town Centre Redevelopment Phase 2**

Opportunities to protect and enhance biodiversity should be incorporated within the redevelopment. **Opportunities should be pursued for:**

- Green infrastructure e.g. street trees (can also help to provide shade in summer and a good environment for residents, visitors and wildlife), green roofs & walls, hedgerows, wildflower grassland verges.
- Sustainable Urban Drainage Systems - choose biodiverse options e.g. swales & ponds where appropriate
- Biodiversity in buildings e.g. swift bricks/ boxes (Swifts are present in this area and are an Amber list Bird of Conservation Concern), bat bricks/ boxes, roof spaces designed for bats, green roofs & walls

**Strategic Development: Bicester 8 – RAF Bicester**

This site is proposed as Tourism Development.

The District Council must ensure that biodiversity is protected and enhanced, particularly for any protected habitats and species on the site. The airfield is a proposed Local Wildlife Site for its potential interest as unimproved grassland and for possible value for invertebrates and birds and should be considered in the same way as a Local Wildlife Site and receive the same level of protection in the planning system.

Surveys are required, including habitat as well as species surveys. Pipistrelle Bat (European Protected Species) roost has been recorded in the area. There are Great Crested Newts (also European Protected Species) at Stratton Audley Quarry to the immediate north of the site. Great Crested Newts spend part of the year living on land and commonly on grasslands. Therefore, it is important that GCN surveys are carried out to ensure the protection of GCN, or mitigation

and compensation. Surveys must be carried out at an early stage.

**Strategic Development: Bicester 9 – Burial Site in Bicester**

Location yet to be confirmed. Cemeteries/grave-yards have the potential to provide good habitats for wildlife. The use of native and local provenance planting and sowing should be encouraged within the landscaping.

**Strategic Development: Bicester 10 – Bicester Gateway**

There is the potential for significant harm to biodiversity from this proposal.

Bicester Wetland Reserve Local Wildlife Site (located between Bicester 10, 4 and Bicester 2) contains many rare and notable species. The site is particularly noted for its bird interest and is a Banbury Ornithological Society reserve. UK Biodiversity Action Plan habitat of CF1: Coastal and floodplain grazing marsh. It is important that the water quality and quantity is not impacted by development (at 10, 4 or 2, or in combination) and that indirect impacts are assessed to ensure that this area is not adversely affected e.g. recreational disturbance, noise, etc. The cumulative impact of development proposed at Bicester 2, 4 and 10 should be assessed, including the potential isolation of the LWS and disruption to the wildlife using the site.

There are many rare and notable species recorded at the LWS. The eastern part of the site also contains records of notable and rare species and therefore it is appropriate that this area (which also may be within the floodplain) is used for informal recreation (provided that this doesn't harm the ecology of the area) and ecological benefit, as proposed in bullet point 9 of the key principles in the policy.

Please amend the bullet point 8 of the policy that states that there needs to be:

“Adequate investigation of, protection of and management of **priority and** protected habitats and species on site given the ecological value of the site”

**Strategic Development: Bicester 11 – North East Bicester Business Park**

The District Council must ensure that biodiversity is protected and enhanced, particularly for any protected habitats and species on the site.

The District Council must ensure that biodiversity is protected and enhanced, particularly for any protected habitats and species on the site. The airfield is a proposed Local Wildlife Site for its potential interest as unimproved grassland and

for possible value for invertebrates and birds and should be considered in the same way as a Local Wildlife Site and receive the same level of protection in the planning system.

Pipistrelle Bat (European Protected Species) roost has been recorded in the area.

The policy wording includes:

*“The site is a proposed Local Wildlife Site. Ecological surveys must be undertaken to identify habitats and species of value and any mitigation measures required. Features of value should be retained and enhanced and the proposals should result in a net gain in biodiversity”.*

#### **Strategic Development: Bicester 12 – East Bicester**

Extensive discussions have already taken place regarding this site and these should be taken into account if this site is developed.

In general, any development which is likely to impact on the existing biodiversity interest within a CTA, or on land which potentially allows for the expansion and linkage of existing habitats, should be strongly resisted. Detailed habitat and species surveys should be carried out to ensure development avoids damage to the existing resource and would not compromise existing wildlife corridor links.

The north-eastern part of Bicester 12 is within the Ray Conservation Target Area and part is potential BAP Priority Habitat. Careful consideration is required to ensure that the biodiversity integrity of this CTA is not compromised by the proposed development (or cumulative growth with other sites).

#### **BANBURY**

#### **Strategic Development: Banbury 1 – Banbury Canalside**

It is encouraging that the following is included within the policy:

*“Protection and enhancement of the biodiversity value of the site recognising the importance of the river and canal corridors”*

Rare and notable species recorded in the area include: Barn Owl, Grass Snake and Kingfisher.

**Strategic Development: Banbury 2 – Hardwick Farm, Southam Road (East and West)**

Potential BAP Priority Habitat outside the site boundary to the east and to immediate north-east.

Great Crested Newt surveys will be required. There is a potentially suitable pond close to the site and fields within the site could be used during the animals' terrestrial phase.

**Strategic Development: Banbury 3 – West of Bretch Hill**

No comments at this stage.

**Strategic Development: Banbury 4 – Bankside Phase 2 (Links to Banbury 12)**

Potential BAP habitat (broadleaved woodland) around the rugby ground, but this appears to be proposed to be retained, also the woodland to the north-east outside the site boundary.

No comments at this stage.

**Strategic Development: Banbury 5 – North of Hanwell Fields**

Constraints have been identified at this site (within the part of the site that was BAN3 at the previous consultation). A brown long-eared (European Protected Species) maternity roost and two semi-improved grassland fields are present on the site

The woodland bounding BAN5 to the north is potential BAP habitat and Natterers Bat has been recorded (all bats are European Protected Species). The woodland should be retained.

**Strategic Development: Banbury 6 – Employment Land West of M40**

Banbury Sewage Farm (adjacent to the site) has records of many rare and notable species, especially birds. This data is generally old and the new survey data for Banbury 6 and adjacent sites will need to be assessed.

**Strategic Development: Banbury 7 – Strengthening Banbury Town Centre**

Opportunities to protect and enhance biodiversity should be incorporated within the redevelopment. **Opportunities should be pursued for:**

- Green infrastructure e.g. street trees (can also help to provide shade in summer and a good environment for residents, visitors and wildlife), green roofs & walls, hedgerows, wildflower grassland verges.
- Sustainable Urban Drainage Systems - choose biodiverse options e.g. swales & ponds where appropriate
- Biodiversity in buildings e.g. swift bricks/ boxes (Swifts are present in this area and are an Amber list Bird of Conservation Concern), bat bricks/ boxes, roof spaces designed for bats, green roofs & walls

#### **Strategic Development: Banbury 8 – Land at Bolton Road**

Opportunities to protect and enhance biodiversity should be incorporated within the redevelopment. **Opportunities should be pursued for:**

- Green infrastructure e.g. street trees (can also help to provide shade in summer and a good environment for residents, visitors and wildlife), green roofs & walls, hedgerows, wildflower grassland verges.
- Sustainable Urban Drainage Systems - choose biodiverse options e.g. swales & ponds where appropriate
- Biodiversity in buildings e.g. swift bricks/ boxes (Swifts are present in this area and are an Amber list Bird of Conservation Concern), bat bricks/ boxes, roof spaces designed for bats, green roofs & walls
- Green corridor - enhance space alongside Oxford Canal for wildlife & people

Any green space will need to be managed in perpetuity. The funding and delivery mechanisms should be identified by developers at the planning application stage, but perhaps CDC could include what they would expect for this in any SPD

Whilst there don't appear to be any major constraints, bat surveys would be required to be carried out at the correct time of year and in advance of any planning application and to inform EIA. Until these surveys are carried out, it is impossible to comment further on potential constraints.

#### **Strategic Development: Banbury 9 – Spiceball Development Area**

Opportunities to protect and enhance biodiversity should be incorporated within the redevelopment. **Opportunities should be pursued for:**

- Green infrastructure e.g. street trees (can also help to provide shade in summer and a good environment for residents, visitors and wildlife), green roofs & walls, hedgerows, wildflower grassland verges.
- Sustainable Urban Drainage Systems - choose biodiverse options e.g. swales & ponds where appropriate
- Biodiversity in buildings e.g. swift bricks/ boxes (Swifts are present within the Banbury area and are an Amber list Bird of Conservation Concern), bat bricks/ boxes, roof spaces designed for bats, green roofs & walls

**Strategic Development: Banbury 10 – Bretch Hill Regeneration Area**

Opportunities to protect and enhance biodiversity should be incorporated within the redevelopment. **Opportunities should be pursued for:**

- Green infrastructure e.g. street trees (can also help to provide shade in summer and a good environment for residents, visitors and wildlife), green roofs & walls, hedgerows, wildflower grassland verges.
- Sustainable Urban Drainage Systems - choose biodiverse options e.g. swales & ponds where appropriate
- Biodiversity in buildings e.g. swift bricks/ boxes (Swifts are present in the Banbury area and are an Amber list Bird of Conservation Concern), bat bricks/ boxes, roof spaces designed for bats, green roofs & walls

**Strategic Development: Banbury 12 - Land for the Relocation of Banbury United FC**

Potential BAP habitat (broadleaved woodland) around the rugby ground, but this appears to be proposed to be retained. No further comments at this stage.

**Strategic Development: Banbury 13 – Burial Site Provision in Banbury**

Location yet to be confirmed. Cemeteries/grave-yards have the potential to provide good habitats for wildlife. The use of native and local provenance planting and sowing should be encouraged within the landscaping.

**Strategic Development: Banbury 14 – Banbury Country Park Support.**

**KIDLINGTON**

**Strategic Development: Kidlington 1 – Langford Lane Technology Park**

Many notable and protected species are present within this area and adjoining areas. These include: Barn Owl, Hobby and Kingfisher (protected as Schedule 1 species under Wildlife & Countryside Act 1981 (as amended)) and Otter (UK Protected Species) and Water Vole (protected under Schedule 5 of Wildlife & Countryside Act 1981 (as amended)). Careful consideration must be given to Rushey Meadows SSSI, which adjoins the south-western boundary of the proposed area of Green Belt review, Lower Cherwell Valley Conservation Target Area and Lowland Meadow BAP Priority Habitat.

It is important that no damage is caused to the SSSI, by direct or indirect impacts, also that impacts on protected species and the biodiversity value of the area are avoided.

**Strategic Development: Kidlington 2 - Strengthening Kidlington Village Centre**

Opportunities to protect and enhance biodiversity should be incorporated within the redevelopment. **Opportunities should be pursued for:**

- Green infrastructure e.g. street trees (can also help to provide shade in summer and a good environment for residents, visitors and wildlife), green roofs & walls, hedgerows, wildflower grassland verges.
- Sustainable Urban Drainage Systems - choose biodiverse options e.g. swales & ponds where appropriate
- Biodiversity in buildings e.g. swift bricks/ boxes (Swifts are present in the Kidlington area and are an Amber list Bird of Conservation Concern), bat bricks/ boxes, roof spaces designed for bats, green roofs & walls.

**Infrastructure Delivery Plan (Section D)**

There is an omission in the Infrastructure Delivery Plan, which currently contains no reference to ecology and scant requirements for Green Infrastructure.

Please insert the following into all IDP tables:

<i>Requirements/ Projects</i>	<i>Phasing</i>	<i>Priority</i>	<i>Policy Linkage</i>	<i>Funding (status and</i>	<i>Responsible body</i>	<i>Partners</i>	<i>Current Status</i>
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					<i>cost if known)</i>			
	Conservation Target Areas	2010-2031		Local Plan policy	Public/private sector  Includes Developer Contributions		OCC & nature conservation organisations e.g. RSPB & BBOWT	
	Ecological mitigation/ compensation/ enhancements OR Include within green infrastructure the need for GI to have multi-functional benefits. GI is not just for amenity green space, but should include informal as well as formal recreation, relaxation, flood mitigation and drainage and for biodiversity.	2010-2031		NPPF	Public/private sector  Includes Developer Contributions			
<b><u>Sustainability Appraisal</u></b>								

**General Comments on the SA**

SA objective 10 is:

10. To conserve and enhance and create resources for the District's biodiversity

I suggest that the need for networks of habitats should also be included within this objective.

Without seeing the full SA with the tables for positive, negative and neutral effects against each objective it is difficult to see how the conclusions have been reached. There are anomalies in the results. For example, the SA concludes that Graven Hill would have a minor positive for biodiversity, whereas West of Bretch Hill would have a minor negative. This does not appear correct. Please can I be consulted on the full SA when it is available?

The Habitat Regulations Assessment (assessing potential impacts on the Oxford Meadows SAC) conclusions will also need to be fully explained in the full report.

**Comments on Summary SA Policies:****BIC 2 – Graven Hill**

I disagree with the assumption that:

“Minor positive effects are identified in terms of ... biodiversity (the policy aims to create a net gain in biodiversity although onsite mitigation is required),...”

This does not appear to take into account the potential for harm to the Local Wildlife Site and potentially to UK and European Protected Species.

**BIC 3 South West Bicester Phase 2**

“There is potential for a significant positive effect on biodiversity as this is relatively low at present for a greenfield site and the policy requires enhancement including through wildlife corridors.”

Whilst this may be correct, there is currently little ecological information available on this site. The results of surveys is required.

**BIC 4 Bicester Business Park**

“Minor positive effects are identified ... biodiversity (plan policies require a net gain in biodiversity on development sites)...”

I understand that consent has already been granted and therefore CDC must ensure that a net gain in biodiversity is achieved in line with their plan policies.

BIC 10 Bicester Gateway

“There is potential for significant negative biodiversity effects given the site is a District Wildlife Site and there are BAP habitats and protected species in close proximity to the site and with regards to efficient use of land since the site is on greenfield land.”

“There is uncertainty with relation to water quality as there is a water course just beyond the site to the east. Development will need to comply with the plan policies on flood risk, SuDS, water resources, water quality protection (Oxford Meadows SAC).”

On my records it appears that BIC 10 adjoins the western boundary of the LWS but that the LWS is outside the site boundary. Please ask CDC to confirm this

BIC 11 North East Bicester Business Park

“Minor positive effects are identified in relation .... biodiversity,.... The site is a proposed Local Wildlife Site which is in conflict with the proposed development, However, the policy requires that ecology surveys are undertaken to identify habitats and species of value and any mitigation measures required. It also specifies that ecological enhancement proposals should result in a net gain in biodiversity.”

I do not agree that there would be a positive impact on biodiversity based on the information available to me at this stage. Unimproved grassland takes a long time to be created, so its loss could not easily be mitigated.

BIC 12 East Bicester

“The SA has identified significant positive effects in relation to:  
Biodiversity as the policy requires provision of open space, the retention and enhancement of hedgerows, introduction of new landscaping features/wildlife corridors, which must ensure a net gain in biodiversity. It also requires a well-designed approach to the urban edge, with good access to the countryside.”

This comment seems incorrect, Bicester 12 is partly within the Ray Conservation Target Area and potentially BAP Priority Habitat.

BAN 2 Hardwick Farm, Southam Road  
(East and West)

“Minor positive effects are identified with regards to biodiversity, resource use, waste and energy.”

Survey information is required, in particular for Great Crested Newts.

BAN 3 Land West of Bretch Hill

“Minor negative effects are identified in relation to air pollution, biodiversity and transport.”

I query why this is recorded as a minor negative for biodiversity, whereas the ecologically sensitive Graven Hill is shown as a minor positive.

BAN 4 Bankside Phase 2

“A number of minor positive effects are identified in relation to ...biodiversity (including protection of trees, retention of hedgerows & wildlife corridors)...”

This appears correct based on the information available to me at this time

BAN 5 North of Hanwell Fields

It is surprising that there is no comment on biodiversity in the summary SA for this site. There are potential ecological constraints that should be recognised.

BAN 6 Employment Land West of M40

“Minor negative effects are identified in relation to efficient use of land (because the site is greenfield) and biodiversity (because there are habitats on site which could be lost through development).”

This appears correct based on the information available to me at this time

BAN 12 Land for the Relocation of Banbury United FC

“Minor negative effects are identified in relation to maintaining vibrant communities (in terms of potential noise pollution), accessibility, air pollution, transport and congestion, biodiversity and landscape.”

	<p>I query why this is recorded as a minor negative for biodiversity, whereas the ecologically sensitive Graven Hill is shown as a minor positive.</p> <p><u>KID 1 Langford Lane Technology Park</u>          “The SA has identified significant positive effects in relation to accessibility as the site is within an existing employment area within Kidlington and for biodiversity as the ecological value appears to be limited and the policy requires a well-designed approach to the urban edge, including a comprehensive landscaping scheme, provision of wildlife corridors and the creation of a green infrastructure network. Significant positive effects are also identified for employment/economic growth as the policy will support the research and development sector and potentially provide employment growth for Kidlington and for.”</p> <p>I question why there are thought to be significant positive effects for biodiversity. Whilst the area proposed for Green Belt review may have low ecological value (surveys yet to be assessed) there are important and protected habitats and species that could potentially be affected by indirect impacts.</p>
<p>Environment &amp; Energy Strategy team</p>	<p>Although the plan appears to have the broad breadth of measures covering their sustainable development policies, many relate to poor performance indicators rather than proactive/good performance. For example:</p> <p>“Planning permissions granted contrary to Environment Agency advice on flood risk grounds”, this doesn’t really measure the progress they’re making to adapting to climate change. It may be better to measure those permissions not granted, or perhaps those conditions granted with conditions to modify the development to ensure we adapt.</p> <p>“Amount of AONB lost to development” again the policies should be preventing this from happening, or measuring where AONB has been protected or whether habitat has been lost in one area and offset by creating a designated similar habitat elsewhere in the district.</p>
<p>Library Services</p>	<p>Oxfordshire County Council is committed to delivering a cost-effective, high quality library service that is fit for the 21<sup>st</sup> century and that will meet the needs of those living, working and studying in Oxfordshire and that will satisfy the Council’s duty under section 7 of the 1964 Act. The library service is highly valued and needs to be sustainable, relevant and available to future generations and will continue to improve and extend the service by, amongst other things:</p> <ul style="list-style-type: none"> <li>• encouraging the use of library buildings as community spaces</li> <li>• working collaboratively with community groups and other service providers to target hard to reach groups by locating and resourcing the library service in other ways and using other community buildings (such as Children’s Centres, Adult Learning Centres, Early Intervention Hubs) where people already access services</li> <li>• incorporating complementary services into library buildings</li> </ul>

	<p>The Cabinet agreed a plan in December 2011 that will see all public libraries remain open. Under this plan Banbury, Bicester and Kidlington libraries have been designated as core libraries. Adderbury, Deddington and Hook Norton have been designated as community libraries.</p> <p><b>Banbury</b>  OCC recognises that the existing Banbury library presents challenges to customer need in terms of its location in the town and its sustainability, being in a listed building where accessibility is poor. It could also be argued to be insecure due to its leasehold tenure. OCC has a strategic intention to look towards the provision of a new library facility for Banbury in a town centre location where it can contribute to and benefit from retail and other town centre activity.</p> <p><b>Bicester</b>  OCC recognises that the existing Bicester library is in an inappropriate location and that its size does not reflect the significant growth in population and customer base. OCC has a strategic intention to look towards the provision of a new library facility for Banbury in a town centre location where it can contribute to and benefit from retail and other town centre activity.</p> <p>New libraries at Bicester and Banbury are not fully funded and therefore are expected to require developer contributions.</p> <p><b>The villages and rural areas</b>  Although the Local Plan does not identify specific sites for future housing allocation, it does identify 23 villages within the district within which these allocations will be made. Within these policy groupings, OCC has libraries at Adderbury, Deddington, Hook Norton and Kidlington. There will therefore be increasing pressures on library services delivered from those libraries as they serve not only the village in which they are located but also the communities from these surrounding villages.</p>
<p>Education &amp; Early Intervention Services</p>	<p>There is great variability in the phrasing and detail of the policy statements regarding education, e.g. Policies Banbury 1-5, Bicester 1-3. Banbury 1 is too brief; Banbury 5 is too spuriously detailed; I would have thought Banbury 3 pitches it about right.</p> <p>Section B page 23 goes into a lot of detail about things which aren't under CDC's control, and then ends up with a very brief BSC7. I've annotated the attached version.</p> <p>Section C page 55 states schools are among the facilities decreasing in rural areas – not true, or rather out of date – there haven't been any schools closed for years, and OCC policy is clear that it resists rural school closure. This statement doesn't at all reflect the current position that excess demand for village schools is more of a problem in nearly all cases. (There is a very small school in CDC which is vulnerable – Finmere – but this is now federated with another school to maintain its viability.)</p> <p>IDP education sections – in each case the “partners” for primary and secondary states “Private sector” – not sure what</p>

	<p>they mean by this (builders of schools or providers of educational services?) It should state "Academy Trusts". For nursery it should include "Private, voluntary and independent providers".</p> <p>There is no mention in the IDP of special education. At the moment the precise needs are unclear, and they will undoubtedly evolve during the plan period, so I would suggest that the comments for each primary and secondary section include "Requirement for <i>mainstream and special education provision</i> to be identified..."</p> <p>For nursery schools the IDP states. "Nursery provision for 3 year olds to be included in new primary schools." There may be some circumstances where this is not appropriate/possible, so better to say "normally"</p> <p>There is no mention of Youth facilities or Children's Centres, but I have not had any requests from either teams. I think we can assume OCC-provided Youth Centres are a thing of the past. Bicester and Banbury both already have 4 Children's Centres, and there is no current appetite for expansion.</p> <p>IDP page 10 - does only explicitly mentioning Canalside imply that nowhere else needs to provide a school?</p> <p>IDP page 13, Kidlington repeats the education sections even though no more housing is being proposed for Kidlington that other villages.</p>
Highways & Transport	<p><b>General comments</b></p> <p><b>There is a lot of repetition and inconsistency in the document, particularly in the policies for individual sites.</b></p> <p>Many of the bullet points in the 'Key site specific design and place shaping principles' sections in the summary boxes for each development area (in Section C) are actually not site specific but rather general guiding principles. These might be better expressed as policies in Section B. Phrases such as 'Layout of development that enables a high degree of integration and connectivity between new and existing communities' and 'A layout that maximises the potential for walkable neighbourhoods, with a legible hierarchy of routes and community facilities' appear in Bicester 1 - North West Bicester Eco-Town (page 9, section C, p 90 of the overall document) and also in Policy Bicester 2: Graven Hill amongst others.</p> <p><b>Similarly, public transport considerations are picked up in some strategic development policies but not in others and the same with walking and cycling.</b> Infrastructure needs and key site specific design and place shaping principles under each of the strategic development sites should include public transport infrastructure (e.g. bus stops, bus priority etc), as well as consideration for public transport routeing and ease of bus manoeuvrability as part of their highway and place designs. An alternative approach may be that instead of these types of issues being repeated for each separate development area that a separate policy is created for them.</p> <p>Part of the same problem is that where such policies do exist (for example ESD7), these are only sometimes referenced in the 'Key site specific design and place shaping principles'. Bicester 1 and 3 both mention the use of SUDS but the applicable policy is not referenced, whereas Bicester 4, 10, 11 and 12 mention it and quote the policy (ESD7). Bicester 2, on the other hand, doesn't mention SUDS at all. Consistency is required.</p> <p>Financial contribution towards public transport improvement is picked up under 'infrastructure needs' for some sites but not others. It is important to note that combined contributions from strategic development towards pump-priming cross</p>

town services that link these with the town centres and core transport interchanges as part of an efficient bus network is likely to be more successful in terms of commercial viability. These will need to operate on a regular frequency, particularly in the peak periods, and to a good quality of service which key employment, retail and commercial areas with residential areas.

Contributions will also be used to upgrade public transport infrastructure (e.g. bus stops, Real Time Information, bus shelters etc) to complement the improvement in bus services. This combined improvement will help to encourage the use of more welcoming public transport and thus reduce the reliance on private car.

**The wider public transport network and sustainable transport links within the development towns need to be considered rather than only in terms of access to the individual strategic development sites – otherwise we will fail to appreciate the wider picture. The plan needs to acknowledge and include opportunities to improve the integration between modes, especially between walking, cycling and public transport in order to maximise journeys made by sustainable means.**

**All sites are capable of incorporating Sustainable Drainage Systems (SuDS).** Some may prove more difficult than others but County Council officers do not envisage this preventing any particular site coming forward.

**In strategy and policy terms the County Council’s Countryside Access Team supports the proposals in this document.** The vision for the district includes the rural economy, high quality of life, and social and physical infrastructure – including green infrastructure. The public rights of way network is central to these aspects and adds value to people’s lives as well as to the local economy. Cherwell have made these linkages very clear throughout the document.

In general road safety terms, approaches that optimise sustainability will tend to support road safety objectives – for example the principle of focussing growth in Bicester and Banbury seems appropriate.

Need to check the LPT3 Objectives are the correct ones throughout the document, as in Section B the LTP3 objectives used are those from LTP2.

**Foreword – page 4 – bottom of the table at the top of the page says “North West Bicester is anticipated to deliver land for 3,000 jobs by 2031”** – this should presumably be a lower figure now that North West Bicester is proposed to deliver 1,794 houses by 2031 and jobs were to match housing numbers.

**Section A: Strategy for Development in Cherwell – the bullet points at the top of page 2 lack any mention of walking and cycling.** A high quality of life should include modes of transport that have health and environmental benefits and enable people to make use of the open space provision.

It needs to be clear that Cherwell will work with OCC and others to deliver the transport improvements – they cannot



	<p>commit to deliver the 3<sup>rd</sup> bullet point at the top of page 2. This is probably taken to be a given but it should be clear. The 3<sup>rd</sup> bullet point of the spatial strategy for Cherwell District (bottom of page 2) touches on economic development close to the airport. It needs to be clear that this is on the neighbouring Langford Lane Technology Park – or is further expansion intended?</p> <p>P3 – need people locally to have the skills to match the new economies in Bicester otherwise there will be high levels of in-commuting.</p> <p><b>Some of the terminology used in these sections needs defining</b>, in particular of ‘<i>knowledge economy</i>’ (first bullet point on page 3), ‘<i>green knowledge</i>’ (top of page 4) and ‘<i>visitor economy</i>’ (end of first paragraph on page 4).</p> <p><b>SO5, page 5 – sustainable modes need to be mentioned in this section. They are lacking throughout the document. Need to define what they mean by “sustainable development”.</b></p> <p>Paragraph at the top of page 6 mentions “south of the District” – this needs further explanation.</p> <p>Need to link between some of the challenges on page 6 – sustainable transport can help health, etc.</p> <p>Under the key challenges list (page 6) it is stated that ‘<i>Cherwell is ranked very poorly on a national measure of geographical accessibility of services.</i>’ In what way is the district ranked poorly? Which national indicator is this based on? What is the evidence that this is the case?</p> <p>Under policy SO12 (page 7) add ‘to services’ after accessibility.</p> <p><b>Section B: Policies for Development in Cherwell</b></p> <p><b>Theme 1: Policies for Developing a Sustainable Local Economy</b></p> <p>Some of the terminology needs definition, in particular ‘Performance Engineering’ (page 1), ‘eco-innovation hub along the Oxford – Cambridge technology corridor’ (page 4),</p> <p><b>There are some contradictory details on skills shortages in Cherwell within this section of the plan, e.g. ‘shortage in skills’ (2<sup>nd</sup> paragraph of page 2) is mentioned and then ‘Cherwell is highly skilled’ (4<sup>th</sup> paragraph on page 2) just a few sentences later.</b></p> <p>The ‘excellent transport links’ on page 2 should also mention ‘public transport’ – bus is good as well as train.</p> <p>The text on homeworking (page 2) should mention the benefits this would have on reducing the need to travel and thus on reducing the strains on the transport network. Text should also be added about encouraging flexible working</p>
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	<p>conditions in workplaces throughout Cherwell to promote healthier lifestyles and minimise transport impacts.</p> <p>The list of employment development on page 4 should include logistics &amp; distribution and tourism to reflect strategic developments like Graven Hill Rail Freight Interchange and RAF Bicester.</p> <p>Both the explanatory text and the policy SLE1: Employment Development should say ‘good access ... by public transport <u>and other sustainable modes, where possible</u>’.</p> <p><b>The top of page 11 states, “The Local Plan promotes a series of proposals to support a modal shift away from an over reliance on the car to less energy intensive forms of transport.” What are these? In many parts of the document sustainable modes and modal shift are missing.</b></p> <p>The text explaining Policy SLE4: Improved Transport and Connections (page 11) needs to include more about the development of public transport networks and bus services within the district, e.g. increased frequency, improved quality and reliability of bus services. This should particularly be the case on cross-town services in Bicester and Banbury, and on those ‘development bus routes’ which operate close to development sites. The aim should be to create an efficient public transport, with the necessary contributions and support from developments, to encourage more journeys to be made by bus and in the long term help bus services become commercially self-sustaining.</p> <p><b>We agree with references made to ‘a new inner relief road within Banbury is being investigated’ in 3<sup>rd</sup> para on page 11 – but this needs to be strengthened to take account of the town-wide Movement Strategy that is currently being progressed (i.e. it is about movement throughout the whole town, not just a specific piece of infrastructure).</b></p> <p>It would be less confusing with the south east relief road proposals if the SW Bicester Perimeter Road was now called Vendee Drive (page 11).</p> <p>The first paragraph of Policy SLE4 on page 12 needs to include ‘key interchanges’.</p> <p>There is no mention of Bicester Park &amp; Ride in this section; there should be.</p> <p>The growth opportunities of London Oxford Airport appear to be overlooked. The airport could become a valuable catalyst for growth and future employment expansion in Kidlington, and the district. The key areas for development at the airport include:</p>
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- a. Intensification of air activity through the growth in scheduled, charter and private air travel services to both national and international destinations. The airport currently has surplus capacity in terms of annual aircraft movements, this is largely due to the decline in flight training activity due to the increased use of ground flight simulators and of overseas 'fair weather' flight training.
- b. Intensification of ground activity within the existing site, in terms of expansion of terminal, office and hangar floor space to accommodate more tenants/companies onto the site and/or to accommodate increased air activity.
- c. Expansion of the airport boundaries, including runway and development on neighbouring sites (e.g. Langford Lane Technology Park)

Under all of the above growth scenarios the airport provides an opportunity to attract businesses in the aviation field into the district.

There should be consistency with the County Council's LTP3 policy SD4 – 'Support the development of air travel services and facilities which contribute to the economic development of the county, unless they have unacceptable transport or environmental impacts, or discourage making the best use of existing capacity.'

**Policy SLE4: Improved Transport and Connections** – needs to reflect the news that the Government will be funding the East West Rail western section improvements and in particular that this will include electrification between Oxford – Bicester Town – Bletchley – Bedford as part of a strategic passenger and freight link to be known as the 'Electric Spine' from Southampton Ports up to Sheffield. The Electric Spine will mean electrification for Oxford – Banbury – Leamington Spa too. This will bring significant improvements for passengers but also improved prospects for rail-linked freight terminals and jobs along the route. Implementation planned for 2014-19. **Theme 2: Policies for Building Sustainable Communities**

**Policy BSC6: Travelling Communities** should include consideration of the proximity to public transport services when identifying potential traveller sites.

**Policy BSC7: Meeting Education Needs** should pick up on the link between sustainable travel and health and wellbeing.

**Policy BSC11: Local Standards of Provision - Outdoor Recreation** – none of the qualitative standards for specific outdoor parks and public spaces really pick up transport and accessibility by sustainable modes, or facilities such as

cycle parking and way finding etc.

**Policy BSC12: Indoor Sport, Recreation and Community Facilities** does not pick up on accessibility standards by sustainable modes. It only mentions 'Accessibility standard - 15 minutes' drive time'

### **Theme Three: Policies for Ensuring Sustainable Development**

**Policy ESD1: Mitigating and Adapting to Climate Change** should look to reduce dependence on private cars, rather than reducing travel, as it appears to be more concerned with the location of development.

Need to amend 'Appendix X' with a specific number on page 36.

**Policy ESD5: Renewable Energy** (page 36) touches on the impacts on aviation activities, but there needs to be more explanation as to what is meant by this.

**Policy ESD6: Sustainable Flood Risk Management** (page 38) needs to clearly define what the 'sequential approach' is.

The second paragraph under the table on page 40 should be changed to say, "We will work actively with the Environment Agency, *Local Lead Flood Authority* and other operating authorities...."

**Policy ESD7: Sustainable Drainage Systems (SuDS)** – the first paragraph in this section, 6<sup>th</sup> line, should read, "...which presumes that SuDS will be used for *all* new developments and redevelopments...."

The bottom of page 40 should read that, "*Highway SuDS will be adopted by Oxfordshire County Council but must be located..... Non-highway SuDS draining two properties or more will be adopted by the Local Lead Flood Authority (LLFA) after Schedule 3 of the 2010 Act comes into force.*"

The **Policy ESD7** box (page 41) – opening sentence should say, "All developmentss will be required..."

The final sentence in the policy box needs to read, "...require the approval of Oxfordshire County Council as *LLFA* as SuDS Approval Body...maintenance and replacement of the *SuDS features*."

**Policy ESD16: The Character of the Built Environment** – detailed text under the 4<sup>th</sup> paragraph should include having regard for sustainable access to, from and within developments. This would then be compliant with LTP3 Policy SD1.

**Policy ESD17: The Oxford Canal** (page 54) - policy box should include ‘encouraging the growing and inclusive use of the Oxford Canal, and support appropriate opportunities for developing transport on the canal and towpath.’ This is consistent with LTP3 Policy AX6 and does not just limit it to leisure and tourism use.

**Policy ESD18: Green Infrastructure** - add the word ‘sustainable’ before connectivity in the 2<sup>nd</sup> bullet point. This allows for access by all sustainable modes.

**Section C: Policies for Cherwell’s Places –**

Some of the wording within the paragraph, “We are looking to secure ... surrounding neighbourhoods” on page 1 could be clearer. Are mixed developments only sought in town centres? How will infrastructure investment strengthen the vitality of the town centre – does this apply to all town centres or just one? How will traffic be progressively redirected and links be strengthened?

This paragraph also should acknowledge that infrastructure investment will encourage the use of sustainable modes, so that it covers cycleways, bus priority measures etc.

The sites that have been proposed for allocation for the future developments in Cherwell can only be summarised for their development control requirements as they are not at a detailed level at this stage and the time limits for responding do not enable a fuller response.

For all sites there must be:

- A masterplan in place i.e. movement frameworks, accessibility assessed etc.
- Vehicle access arrangements designed to the appropriate design standards determined by the Oxfordshire County Council as the Local Highway Authority.
- Residential developments/layouts in line with the guidance in Manual for Streets, SUDS and designed/constructed to Oxfordshire County Council specifications to enable future adoption. Site specific Design Codes are to be agreed by both the Local Highway Authority and the Local Planning Authority by working closely with developers.
- Commercial developments designed and constructed to Oxfordshire County Council specifications.
- Future transport strategic improvements such as footway, footpath, cycle routes, relief road alignments identified

	<p>on site allocations.</p> <ul style="list-style-type: none"> <li>- Pedestrian and cycle audits will be required where appropriate with identified improvements provided by a development if assessed necessary.</li> <li>- Public transport links assessed and audited as part of a Transport Assessment. With the high number of sites being put forward in Banbury and Bicester as part of the draft local plan a public transport service strategy including robust service specifications for the towns must be in place prior to any sites being approved. The funding of these services needs to be costed and paid for by the developments.</li> <li>- Drainage formally agreed and approved by Oxfordshire County Council's Drainage Team.</li> <li>- Rights of Ways checked to ensure no footpath diversions are required etc.</li> <li>- Transport related infrastructure mindful of Oxfordshire County Council's reduction to its carbon footprint policies and working practices.</li> <li>- Appropriate highway boundary investigations and land searches undertaken where appropriate.</li> </ul> <p>Car &amp; cycle parking standards must be included within the Local Plan to ensure they are adopted by the District.</p> <p><u>Required documents for future submission and design requirements:</u></p> <p>A robust Transport Assessment (TA Scope can be provided)</p> <p>A Travel Plan</p> <p>Development layout to accord with MfS (and to be constructed to OCC specifications)</p> <p>Car parking standards to OCC/CDC adopted standards</p> <p>Cycle parking standards to OCC standards</p> <p>Tracking plans</p> <p>Pedestrian and Cycle Audit</p> <p>Safety Audits on proposed access arrangements and off-site highway improvements</p> <p>Transport Contribution strategy of town and public transport infrastructure and enhancements to existing/new bus services</p> <p>S106 Agreements</p> <p>S278 Agreements</p> <p>Construction Traffic Management Plan</p> <p>Routeing Agreement</p>
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**C.1 Bicester**

The Masterplan list of town needs should pick up on transport, including the need for sustainable transport networks and strategic links.

**“...to meet the transport needs of the town by...” on page 2 - need to make it clear that the South East relief road will enable improved sustainable movements in the rest of the town.**

The improvements to Junction 9 M40 should be added to the list of initiatives that will benefit Bicester, on page 2. This will improve journey time and reliability (through reduced delays) and will enhance a key link between the town and the ‘M25 corridor’ and West Midlands.

The section on transport needs on page 3 should include improving the connectivity and attractiveness of pedestrian, cycle and public transport networks across Bicester. The emerging Movement Strategy makes it clear that the additional road infrastructure to the east will open up the rest of the town for sustainable modes. This benefit needs to be clear. **Despite considerable investment mode shift work is missing – refer back to the top of page 11 in Section B which claims this is evident within the document.**

The section needs to acknowledge that new developments coming on board in Bicester will maximise opportunities to create an efficient and attractive public transport network within the town, which will link strategic developments with the town centre, the train stations, larger settlements (e.g. Oxford) and rural communities (e.g. Arccott and Ambrosden).

This section does not mention the ‘garden city’ concept that is mentioned within earlier sections of the plan.

The Bicester paragraphs of Section C already say a fair amount bit about EWR, but this should be expanded to talk about the electrification plans. The sub-section about the town in 2031 needs to talk about the significant investment in the rail infrastructure that will have been made by then and the opportunities this will bring to Bicester in terms of attracting businesses to the town and, as in-commuting becomes more of an issue in the future, the opportunities to bring people in by sustainable transport.

**Bicester in 2031** – the Bicester vision bullet points (page 6) should include an additional aspiration to, ‘Create an efficient sustainable transport network within the town which maximises connectivity between the strategic development sites, the town centre and key interchanges, particularly the railway stations, so as to achieve high levels of sustainable transport use.’

**Strategic Development: Bicester 1 – North West Bicester Eco-Town**

It is important, from a transport perspective, that the build out of the development is phased such that it concentrates growth, preferably close to the B4030, B4100 and A4095 borders, rather than having fragmented pockets of developments spread over a wide area of the site. The latter would make it very difficult to serve by public transport.

Infrastructure needs in the policy box on page 9 – whilst crossing of the railway line is one of the key aspects of the site, it is not the only one and is not readily resolved. The access and movement must mention the emphasis on sustainable modes and include public transport infrastructure (e.g. bus stops).

The railway does cut through the site and there should be more than one bridge or subway point across the railway line so as to minimise the severance it causes, and to ensure access and integration across the site. The crossing point should include public transport access so as to ensure that an effective public transport service can serve the entire site. If these elements cannot be delivered an effective alternative approach must be put forward that deals with movements across the whole site and the increased use of Howes Lane / Lord's Lane and the Bucknell Road railway bridge that this would result in.

The details of access points will need careful consideration as the masterplan for the site is considered. Connectivity with the existing town will be a priority.

Contributions to a core frequent public transport route should aim to deliver a commercially self-sustaining service once North West Bicester reaches its final stages of completion.

LTP3 Bicester Area Strategy refers to a Rapid Bus Route. The current thinking on public transport movements between the site and the town centre will need careful consideration as the masterplan for the site emerges.

The policy box needs to remove the Graven Hill sentence – 4<sup>th</sup> bullet point on page 10!

**Strategic Development: Bicester 2 - Graven Hill**

There is no mention of a bus service or bus infrastructure. The “excellent transport connections” paragraph on page 11 should mention the existing bus service (the S5) which is currently operating to an hourly frequency along this section of the route and which could run more frequently as Graven Hill progresses. In addition, a new local service around the site would be developed and there is an opportunity to link this site with Bicester Town Station, the town centre and North West Bicester through a cross-town service.

New access points into the site should be situated as close as possible to the A41 and existing bus stops.



Ensure sustainable connectivity to the Rail Freight Interchange

J9 missing from the text.

Sustainable travel missing too.

Under 'key site specific design and place shaping principles' it is stated that there will be "a high degree of integration and connectivity between new and existing communities" - how will this site link in with the existing town? This is an essential issue that needs to be resolved.

Make clear what a South East relief road would deliver for Graven Hill.

No talk about Site C.

**Strategic Development: Bicester 3 - South West Bicester Phase 2**

It is unlikely that the main Phase 1 bus services will divert from its route to serve the Phase 2 site, therefore they should remove reference to 'extending the Phase 1 bus service' at the top of page 14. The emphasis should be on the provision of effective walking and cycle links to the Phase 1 bus route (including additional bus stops), as well as the new Park & Ride and new bus stops along Middleton Stoney Road (B4030).

**Strategic Development: Bicester 4 - Bicester Business Park**

Under the 'key site specific design and place shaping principles' within the policy box – amend the 4<sup>th</sup> bullet point to 'Construction of bus stop lay-bys close to the A41 pedestrian crossing to link the new development to bus services that operate along this key Oxford – Bicester corridor.'

"Contribution to the creation of a footpath network around Bicester" – should be clearer that this is about pedestrian / cyclist access between sites in southern Bicester.

**Bicester 5 and 6 – Strengthening Bicester Town Centre and Bure Place Town Centre Redevelopment Phase 2 –** the issues are about access to the town centre and movements within the area.

**Bicester 7 – Meeting the Need for Open Space, Sport and Recreation** – with the policy box the first bullet point would be clearer if the following wording was added in, "Seek to establish an urban edge park around the outskirts of the town, by protecting the existing network of green spaces and securing new open space *and linear route* provision linked with public footpaths/cycleways, to create a circular route with connections to the town centre and the countryside beyond". This is covered under policy ESD18 but would be clearer here.

**Strategic Development: Bicester 8 - RAF Bicester**

The policy needs to mention access to the site by public transport, via the Caversfield Turn bus stops which are on the Oxford – Cambridge Corridor.

**Strategic Development: Bicester 10 - Bicester Gateway**

This is a good example of the inconsistency in the style of writing about individual sites. This one which is more removed from the town than some others does mention sustainable travel options whereas others with easier such links do not mention this. Consistency in approach is required.

Direct bus services to this development are unlikely to become commercially viable and would not be supported by the County Council. Therefore under the 'key site specific design and place shaping principles' in the policy box the emphasis should be on improving the walking and cycling links to the Chesterton Turn bus stops or the bus stop lay-bys which are proposed as part of the Business Park development, rather than accommodating bus stops to link the development with the wider town.

There is little need for another A41 pedestrian crossing near this development. Is bullet point 6 referring to the one proposed for the Business Park?

**Strategic Development: Bicester 11 - North East Bicester Business Park**

The 'key site specific design and place shaping principles' in the policy box should include connections to existing public transport services through the creation of new stops and walking routes.

**Strategic Development: Bicester 12 - East Bicester**

Include the word 'sustainable' under the 6<sup>th</sup> bullet point in the 'key site specific design and place shaping principles', i.e. "Improved *sustainable* connections...."

**C.2 Banbury**

These comments have not tried to pick up on the typos but one glaring one is on page 25 of Section C, the 3<sup>rd</sup> paragraph reads, 'Banbury faces *typographic* constraints to the east (the M40) and west...."

From the same paragraph, the following also does not read very well, "These are all natural (and manmade) barriers to growth.'

'Whilst most employment and housing growth will take place on the edge of the town, this plan seeks to also take active steps to strengthen the town centre' page 25, section C.2 seems the opposite to, 'This Plan seeks to ensure that the town centre remains the primary focus for new development;' page 26, section C.2.

C.2, page 27, the following text is unclear, "The town centre has an inner town centre core area and an outer town centre core area. It is intended to expand the town centre boundary (and the core area) over the period covered by the strategy." Further description of these inner and outer cores are needed and is the expanding town centre boundary the one that covers both core areas or just the inner one? This is unclear.

	<p><b>Meeting the challenge of Building a Sustainable Community in Banbury</b> (page 27, 1<sup>st</sup> paragraph) – the issue of access to services being deprived needs to be explained. Is this access to services via public transport or is it a lack of, or variety of other public services such as libraries?</p> <p>Similarly under the 2<sup>nd</sup> bullet point on page 28, is it the provision of those services that needs to be improved or public transport links to existing services need to be provided?</p> <p>‘Banbury’s key environmental challenges’ (page 28) - the 2<sup>nd</sup> bullet point should be more specific, be worded to say, “The need to manage traffic congestion, <i>reduce dependency on the private car and provide more opportunities to make journeys on foot, by bike and on public transport.</i>”</p> <p>“Managing traffic congestion” is mention twice in this list.</p> <p>Under the last paragraph on page 28 replace ‘<i>traffic management</i>’ with travel.</p> <p>The Banbury paragraphs of Section C also need to be expanded to talk about the ‘Electric Spine’ on the Oxford – Banbury – Leamington Spa corridor too and the benefits it will bring including attracting more businesses and jobs to the town. Perhaps this is best discussed under the headings of “Banbury in 2031” on page 110 by adding a bullet point and in “Strategic Development: Banbury 1 - Banbury Canalside” on page 111, since it is through the Canalside Strategic development site that access to/from Banbury Station can be greatly improved and realised.</p> <p><b>Banbury in 2031</b> - under the 3<sup>rd</sup> bullet point amend the sentence, ‘There will be more opportunity to travel on foot, by cycle, and by bus <i>through sustainable transport networks within the town</i>, and traffic management measures will have been implemented’</p> <p>Under the 8<sup>th</sup> bullet point on the Strategy for Banbury, amend the sentence to read, ‘Provide for new development in accessible locations which will provide good opportunities <u>for accessing</u> public transport <i>and enhancing the town’s bus route network</i>, for delivering and using new cycleways....’</p> <p><b>Strategic Development: Banbury 1 - Banbury Canalside</b> Question the deliverability and viability of a ped/cycle bridge over the railway line, as unlikely to be able to deliver without the input of Chiltern Railways who at present have reservations about open access through the station.</p> <p>The Canalside development should incorporate improvements to the railway station forecourt. The development needs</p>
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to facilitate a high quality walking route between the station and the town centre. Suggest this is included under 'Infrastructure needs' - new bullet point: "Provision of well-defined walking and cycling route/s between Banbury rail station and Banbury town centre to form a primary route as part of a walkable neighbourhood, to encourage sustainable modes of travel."

'Infrastructure needs' - new bullet point: "Provision of a bus route through Canalside, to serve Banbury Rail Station via Station Approach and Tramway Road forming a key Banbury bus route."

**Under 'Infrastructure needs', add new bullet point: "Bring forward opportunities for capacity enhancements on the Cherwell Street corridor and Bridge Street junction as part of the Canalside development, for the benefit of north-south vehicular traffic but also for pedestrians and cyclists travelling between the town centre and Grimsbury area." This is a key transport requirement/opportunity with this development and will form a key part of the SPD, so worthy of inclusion in the Local Plan.**

Under the 'key site specific design and shaping principles' – amend the 11<sup>th</sup> bullet point to include consideration or facilitation of bus movements too. Also amend the 14<sup>th</sup> bullet point to read, 'The provision of a bus route through the site with *improved bus stop arrangements at the railway station and new bus stops in the site.*'

Key Site Specific Design and Place shaping principles - New Bullet point: "Submission of a transport assessment and travel plan will be required to assess the transport implications". Or this should be in a general policy in Section B.

**Strategic Development: Banbury 2 - Hardwick Farm, Southam Road (East and West)**

'Infrastructure needs' – new bullet point: "Provision of good public transport service serving both development areas, providing links to the town centre".

'Infrastructure needs' – new bullet point: "Provision of walking and cycling routes throughout the development to access local services and integrate with surrounding urban areas, in particular areas of existing employment".

'Key site specific design and place shaping principles' – add "via sustainable transport modes" after communities under the 4<sup>th</sup> bullet point. Under the 5<sup>th</sup> bullet point include public transport.

Add the incorporation of public transport services which link this development to other strategic developments (i.e. North of Hanwell Fields, Bankside, Spiceball Development Area), the town centre, the railway station, as part of creating an efficient bus network across the town that will, in the long term become commercially self-sustaining.

Key Site Specific Design and Place shaping principles - new bullet point: "Submission of a transport assessment and travel plan will be required to assess the transport implications". Or this should be in a general policy in Section B.

**Strategic Development: Banbury 3 – West of Bretch Hill** – within the infrastructure needs and place shaping

principles there needs to be a strong focus on providing green infrastructure alongside interpretation and outreach here as the area has spring deprivation but good location for access to nature and greenspaces.

In reference to the 4<sup>th</sup> bullet point under the infrastructure needs – it is unlikely that the existing Bretch Hill bus service will be re-routed to serve this site. Instead the existing service will probably be upgraded in terms of frequency and quality. The emphasis should therefore be on the provision of effective walking and cycling links to the existing bus stops which may be relocated and the existing local centre. This suggestion could be picked up under the 7<sup>th</sup> bullet point under the specific design and place shaping principles.

**Strategic Development: Banbury 4 - Bankside Phase 2 (Links to Banbury 12)**

Need to acknowledge there is a possible access issue, as this site is only accessible from Bankside Phase 1, and not from the existing highway network.

There is concern that the access to Bankside Phase 1 with signals at A4260/Weeping Cross will be over capacity with the addition of Bankside Phase 2.

There is some potential in having the site served by the Phase 1 bus service, or indeed the north-south cross-town bus service suggested above for 2. Hardwick Farm strategic development.

Under the 'Access and Movement' element of the infrastructure needs add public transport infrastructure.

'Infrastructure needs' - new bullet point: "Provision of a bus terminus within the site, to provide end of route facilities".

'Infrastructure needs' - new bullet point, "Provision of walking and cycling routes throughout the development to access local services and integrate with surrounding areas, in particular Bankside Phase 1".

Add buses to the 1<sup>st</sup> bullet point under 'key site specific design and place shaping principles'. Also consider connectivity to the neighbouring Football Club relocation and the Phase 1 Bankside development. Add connectivity with existing public transport services (e.g. S4 Banbury to Oxford service).

Key Site Specific Design and Place shaping principles - new bullet point: "Submission of a transport assessment and travel plan will be required to assess the transport implications". Or this should be in a general policy in Section B.

**Strategic Development: Banbury 5 - North of Hanwell Fields**

Under the 2<sup>nd</sup> bullet point on infrastructure needs add the incorporation of public transport services which link this development to other strategic developments (i.e. Hardwick Farm/Southam Road, Bankside, Spiceball Development Area), the town centre, the railway station, as part of creating an efficient bus network across the town that will, in the long term become commercially self-sustaining.

'Infrastructure needs' – new bullet point: "Provision of walking and cycling routes throughout the development to access local services and integrate with surrounding areas, in particular local facilities in Hanwell Fields".

Key Site Specific Design and Place shaping principles - new bullet point: "Submission of a transport assessment and travel plan will be required to assess the transport implications". Or this should be in a general policy in Section B.

**Strategic Development: Banbury 6 – Employment Land West of M40**

It is very questionable as to whether this site is within walking distance of the town centre and bus and railway stations. Has this been assessed?

No bus services run along Overthorpe Road. The nearest bus stop is over 1km away on Middleton Road, which makes the site rather inaccessible by public transport. The development should fund a bus service to the site.

**The line for a road has been protected through this site by Cherwell’s Planning Committee. Investigations are underway as part of the town-wide Movement Strategy to assess the need for this piece of infrastructure.**

Is there possible conflict that this site may have planning permission before the Cherwell Local Plan is adopted, and therefore the objectives of the site may not be delivered as outlined in the Local Plan?

Under the satisfactory access arrangements (11<sup>th</sup> bullet point) under the ‘key site specific design and place shaping principles’ there should be an emphasis on improving pedestrian and cycle links to the railway station.

‘Infrastructure needs’ – new bullet point: “Provision of good public transport service providing links to the town centre”

Key Site Specific Design and Place shaping principles - new bullet point: “Submission of a transport assessment and travel plan will be required to assess the transport implications”. Or this should be in a general policy in Section B.

**Strategic Development: Banbury 7 - Strengthening Banbury Town Centre**

Within the Canalside bullet point – consider re phrasing “This area will form an important link between the rail station..” to “This area will form an important walking and cycling route between the rail station..”

Banbury Bus Station – this text is not clear as to whether the bus station is being redeveloped to keep the bus station facility on this site or if the bus station site will be redeveloped for commercial use and the bus station facility will be provided elsewhere? This issue should be addressed here, as providing excellent bus access to Banbury town centre (from within and from outside of Banbury) is vital to the success of the town.

Redevelopment of the bus station should include the aim to improve bus routeing and the passenger waiting environment, and to create an attractive public transport interchange and gateway into the town centre.

**Strategic Development: Banbury 8 - Land at Bolton Road**

Under the ‘key site specific design and place shaping principles’ amend the 9<sup>th</sup> bullet point to read, “Enable sustainable modes of travel through the provision of high quality walking routes to access public transport”.

Key Site Specific Design and Place shaping principles - consider adding a new bullet point with regard to the design of

	<p>the car park.</p> <p>Key Site Specific Design and Place shaping principles - new bullet point: “Submission of a transport assessment and travel plan will be required to assess the transport implications”. Or this should be in a general policy in Section B.</p> <p><b>Strategic Development: Banbury 9 - Spiceball Development Area</b>  ‘Infrastructure needs’ – new bullet point: “Develop a well-defined pedestrian and cycle route to the town centre, bus stops and the rail station”.</p> <p>Add under the ‘key site specific design and place shaping principles’, include, “Encouraging more trips to be made by sustainable modes of transport, through the provision of public transport, pedestrian and cycling infrastructure”.</p> <p>Key Site Specific Design and Place shaping principles - new bullet point: “Submission of a transport assessment and travel plan will be required to assess the transport implications”. Or this should be in a general policy in Section B.</p> <p><b>Strategic Development: Banbury 10 - Bretch Hill Regeneration Area</b> – within the infrastructure needs and place shaping principles there needs to be a strong focus on providing green infrastructure alongside interpretation and outreach here as the area has spring deprivation but good location for access to nature and greenspaces.  ‘Infrastructure needs – Access and Movement’ - consider rewording this as the regeneration is unlikely to deliver a direct bus service from Bretch Hill to the employment areas in Banbury such as Beaumont Rd/Ermont Way etc (except those in the town centre). Suggest amending the 4<sup>th</sup> bullet point to read, ‘The scheme will look to <i>enhance existing bus services to the town centre through promoting greater awareness of opportunities to travel by bus, enhancing public transport infrastructure in Bretch Hill and walking and cycling links to bus stops.</i>’</p> <p>The existing traffic calming measures in Bretch Hill should also be reviewed as part of the regeneration with consideration given to bus and pedestrian movements.</p> <p><b>Strategic Development: Banbury 12 - Land for the Relocation of Banbury United FC</b>  The relocated club will not be as sustainable as its current location because it will be on the most southern extent of the town. Therefore efforts must be made to provide good pedestrian and cycle links between this site and bus services which will serve the neighbouring Bankside phase 2 site, and on the existing Oxford to Banbury service which runs along the adjacent Oxford Road (A4260).</p> <p><b>Strategic Development: Banbury 14 - Banbury Country Park</b> - under ESD18 the improvements to linking public</p>
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rights of way should be funded through developments that are contributing to the country park.  
This site is not in a sustainable location as far as public transport access is concerned as no bus services currently go near the site.

'Infrastructure needs – Access and Movement' - should include text on improving pedestrian and cycle access to public transport services which will serve the neighbouring Hardwick Farm/Southam Road strategic development site.

### **C.3 Kidlington**

Add another point under the main issues list (page 51), 'Building on strong public transport links to Oxford and Bicester by improving and extending the frequency and quality of bus services serving key growth areas of Kidlington, such as Langford Lane Technology Park.'

Rename Oxford London Airport to 'London Oxford Airport'

The policy fails to mention Water Eaton Parkway and the wider Evergreen 3 project, and the opportunities that this will bring to the village.

#### **Strategic Development: Kidlington 1 – Langford Lane Technology Park**

The 'design and place shaping principles' should include integration and connectivity between the village centre, Oxford, Bicester, Water Eaton Parkway, new and existing development, including surrounding employment areas and services. Improvements are needed to public transport, walking and cycling, so as to encourage sustainable travel and reduce the reliance on private cars.

The existing peak orientated bus service needs to be developed into an all-day facility which will meet the growing demands of the enterprises in the area.

#### **Strategic Development: Kidlington 2 – Strengthening Kidlington Village Centre**

It is stated that the Village Centre will be expanded and the aim of this, but not how this will be achieved.

Within the two policies for Kidlington: 1) *Langford Lane Technology Park* and 2) *Strengthening Kidlington Village Centre*, there is no mention of links to public transport. Links to Kidlington are relatively good, however, currently links to Langford Lane area are poor and will need to be improved (upgraded to premium route standard) if more employment is located here. There will also be the need for sufficient links from the airport (and Langford Lane) to Water Eaton and Oxford.

There is no mention of travel plans – this needs to be amended (or covered in a general policy under Section B)



#### **C.4 Our Villages and Rural Areas**

Why is Kidlington and the airport also picked up under this section too? It is suggested that the main points on Kidlington are kept within the dedicated Kidlington section as people reading the Local Plan for Kidlington only, will not necessarily look at the rural areas section.

#### **Policy for Villages 5 – Former RAF Upper Heyford**

Under 'Infrastructure – Access and Movement' amend to read, “transport contributions, *including contributions to improving public transport services with the aim of the service becoming self-sustaining in the long term....*”

Amend the 4<sup>th</sup> bullet point under the 'key site specific design and place shaping principles' to say, “... encouraging travel by *sustainable modes, in order to reduce the dependency on the private car as far as possible.*”

**Policy for Villages 4 - Meeting the Need for Open Space, Sport and Recreation** - the Core Strategy and the planning obligations SPD must specify that any allocations for green infrastructure or open space include linear routes and green corridors (like public rights of way) for the Cherwell villages and rural areas. This is because rights of way close to villages are important social and recreational assets.

**Policy for Villages 5 – Former RAF Upper Heyford** – the fourth bullet point under place shaping principles should be amended to read “Integration of the new community into the surrounding network of settlements by *reconnecting dead-end routes, making new connections* and encouraging travel by means other than private car as far as possible.”

#### **Section D. The Infrastructure Delivery Plan**

##### **Policy INF 1: Infrastructure**

Under the 2<sup>nd</sup> bullet point add “adoption and maintenance responsibilities”.

**Appendix D.1 – Infrastructure Proposals for Bicester, Banbury, Kidlington and the Rural Areas** – under **Transport** there needs to be a separate line for Public Rights of Way. This may need a specific bullet included under walking and cycling. Also this table needs to include LTP3 policies CW1-CW5. Similarly there is no specific mention under **Green Infrastructure**. County Council officers recommend that a bullet point in one or both of these sections for public rights of way is included – either implicitly or explicitly as it ties into the county’s Rights of Way Improvement Plan work and the work necessary for the Infrastructure Framework.

##### **Appendix D.1 – Infrastructure Proposals for Bicester**

##### **Infrastructure Plan – Bicester**

Remote Park and Ride at Bicester – add developers and Bicester Village under the partners. Also amend the benefits to ‘This will help to reduce pressures on the local road network, including the A41 and A41, by intercepting car journeys made to Bicester, Oxford and Bicester Village’

Under East West Rail add Chiltern Railways and Oxfordshire County Council to partners.

	<p>Under Evergreen 3 add Oxfordshire County Council to the partners.</p> <p><b>Banbury</b> Need to decide how much detail will be presented here – Banbury is not as detailed as Bicester but they should be on a par with each other in terms of describing what is listed. Public transport should be included in the 2<sup>nd</sup> item on the list</p> <p><b>Kidlington</b> Reference to the Access to Oxford project should be replaced with ‘the northern approaches to Oxford (under the old Access to Oxford project)’. The phasing for this is beyond 2016 not 2010-2016 and £62m is not identified for it. Include Evergreen 3, particularly Water Eaton Parkway to the list London Oxford Airport is not the responsibility of Oxfordshire County Council. It is the responsibility of its owner and is regulated by a number of government bodies including the Department for Transport and the Civil Aviation Authority. Include public transport under the third transport item.</p> <p><b>Rural areas</b> Include public transport under the first transport item.</p>
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