

PART B – RESPONSE TO CHERWELL LOCAL PLAN PARTIAL REVIEW [OXFORD’S UNMET NEEDS]  
ON BEHALF OF KIDLINGTON PARISH COUNCIL

This document sets out Kidlington Parish Council’s response to policies of the Submission Plan and supporting documents.

In response to Question 3 we have no specific comment to make at this time as to whether the Plan is legally and procedurally compliant or is compliant with the duty to cooperate.

Our view is that the Plan and supporting documents are not sound in respect of being positively prepared, justified, effective and consistent with national policy.

Responses are made in the remainder of this document to the following Policies:

- PR1
- PR2
- PR3
- PR3c
- PR3d
- PR4b
- PR6a
- PR6b
- PR6c
- PR7a
- PR7b
- PR8
- PR11
- PR12b

Please note response to PR6a, PR6b, PR3c and PR3d are grouped under the heading of ‘Land south of the Railway’ in section 5.

**Objection to Policy PR1: Prematurity in apportionment of substantial growth to CDC**

- 1.01 Until the Oxford City Local Plan has been Examined and completed, the exact level of unmet need is uncertain, due to the mismatch between the 2031 date in the SHMA, and the 2036 date in the Plan. The Government has now published a Consultation document (Planning for the Right Homes in the Right Places) as to how OAN should be consistently calculated, and both Oxford and Cherwell Partial Review Plans will be subject to the new guidance.
- 1.02 Revisions may well be required to update the current 2014 SHMA on which all Oxfordshire Local Plans are based, to meet the new guidance. The indications in figures published by the Government at this time are that both Cherwell and Oxford have grossly overestimated the level of new housing required, and significantly less growth needs to be accommodated.
- 1.03 It is therefore premature to make decisions on the Cherwell Partial Review Local Plan (CPRLP), which only concerns accommodating Oxford's unmet need, until the Authorities have progressed to accurate conclusions on an updated OAN for Oxford, and tested this through the Examination into the Oxford City Council LP. Only then can the scale of 'displacement' or unmet need be established.
- 1.04 The KPC notes that the emerging Oxford Plan continues to allocate land for economic/employment growth within its boundaries, thus reducing land available for housing growth. Representations have been made to Oxford City Council, requesting a review of this strategy, as it is not considered that sufficient priority is given to accommodating urgent housing need, in preference to further employment growth which will further exacerbate housing need.
- 1.05 The distribution of unmet need between the neighbouring Authorities has been determined as guidance by the Oxfordshire Growth Board, to be tested in individual LPs against the reality of whether it can be accommodated. It is clearly stated that this is 'a working figure', within which Cherwell has been 'asked to consider 'accommodating 4400 units as its share of the unmet need. KPC do not consider that

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the apportionment to CDC is reasonable in scale, bearing in mind the very short length of common boundary and other local factors, including adopted policies which seek to protect the separation of settlements very close to the Oxford City boundary.

1.06 It is the view of the Kidlington Parish Council (KPC) that the evidence base for the CPRLP demonstrates that the scale of development proposed cannot be accommodated in the part of the District closest to the City without unacceptable harm to interests of importance, and therefore proposes unsustainable development.

Interests of importance include:

- (i) Unacceptable harm to the integrity, functions and scale of the Green Belt
- (ii) Unacceptable congestion and worsening of air quality on local roads
- (iii) Unacceptable damage to the individual character of local settlements
- (iv) Unacceptable loss of open land which preserves a separation between settlements and is valued open land

1.07 The proposed Policy PR1 confirms that development will only be sustainable if it 'does not cause harm to the delivery of the Cherwell Local Plan 2015'. It should also take account of the 2016 Kidlington Masterplan, which has as its core the essential need to preserve the separate identity of Kidlington as a settlement. KPC considers the proposals in PR1 do not represent sustainable development, and thus conflict with NPPF advice.

1.08 The proposals are inconsistent with policies of the existing Development Plan including Policy ESD13 of the adopted Local Plan in terms of the impact on local landscape character, and ESD14 regarding separation of settlements. By increasing visual intrusion and harming the local landscape, development of the huge scale proposed would be contrary to these policies. Policy ESD15 seeks to respect an area’s unique built, natural and cultural context. Development on the scale proposed is incompatible with adopted Policy in the Cherwell Local Plan.

**SUMMARY**

1.09 KPC objects on grounds of prematurity – it is not possible to take the enormous and irreversible step of releasing land from the Green Belt for development until it is demonstrated:

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- (a) that exceptional circumstances exist to justify development in the Green Belt, and
- (b) that the scale of 4,400 new homes in CDC is proven to be necessary.

**CHANGES REQUIRED**

- 1.10 More detailed work is essential to determine the up to date OAN for Oxford City, and to maximise the use of land within the City boundary for new housing. The scale of unmet need can then be properly established.
- 1.11 The Oxford Growth Board needs to consider afresh the distribution of newly calculated unmet need between the neighbouring Authorities, giving greater weight to the importance of avoiding the release of Green Belt land in Cherwell in particular, where studies have confirmed that existing Green Belt land performs an essential Green Belt function in terms of the NPPF.
- 1.12 Until these processes have been completed, Policy PR1 cannot be proven to be justified or in accordance with the NPPF in relation to the permanence of Green Belts. Policy PR1 provides an unacceptable starting point for the remainder of the Plan, and is premature in advance of up to date research.
- 1.13 The scale of growth proposed at 4400 dwellings is too high and needs to be reduced in order to better achieve sustainable development. The Parish Council considers that any further development will lead to detrimental effects on the community and environment.
- 1.14 However if development has to be accepted then the quantum of growth should be restricted to a capacity which does not significantly adversely impact on the separation and separate identity of settlements, valued landscapes, local character and local transport congestion.
- 1.15 If adopted, Policy PR1 should include an additional requirement that all new allocated development makes adequate provision for all relevant infrastructure, unless other arrangements have been secured. Development should not proceed in advance of certainty about the delivery of off-site infrastructure.

**Objection to Policy PR2: Housing Mix, tenure and size**

- 2.01 The entire premise of the Plan is that additional land is required to be allocated in Cherwell to accommodate Oxford's unmet housing needs, and to ensure that a high proportion of that new housing is genuinely affordable.
- 2.02 KPC supports a requirement for 50% of new housing to be genuinely affordable. For clarity, it would be helpful if this requirement was included in Policy PR2, rather than in each individual allocation. It is noted that it is not yet included in the Policy concerning unallocated sites (PR12B).
- 2.03 Policy PR2 gives insufficient certainty to the delivery of affordable housing for Cherwell residents who are employed in Oxford, and facing similar affordability problems.
- 2.04 The Plan proposes that the definition of Key workers used in the Oxford City Plan should be adopted. KPC has concerns that CDC housing clients might be displaced from the Housing Waiting List by Oxford clients - in particular, by University Key workers to the detriment of other clients in housing need who are employed in local schools, the health service and other jobs which serve the whole community. Mindful of the fact that the Universities own much of the land proposed for new housing, it is suggested that only these sites should afford Key worker status to University staff.
- 2.05 KPC has been unable to access any clarity from the relevant Authorities on how the allocation of new affordable housing will work in practice – the houses will be within CDC, but there is no visible process for shared nomination rights with Oxford City Council. As this is such an integral part of meeting Plan objectives, the principles to be adopted should be an annex to the Plan.
- 2.06 Fuller information on the proposed strategy is essential before the Policy is adopted. It is not sufficient to defer this arrangement to a later stage.

**CHANGES**

- 2.07 There needs to be greater detail in the Policy and supporting text (or an Appendix) regarding how affordable housing will be defined and delivered such that it continues to remain affordable for all local residents working in Oxford. Further details should also be given on the mix of market housing type and how key worker housing will be provided.

**Objection to Policy PR3: Release of GB land for development**

3.01 Successive strategic plans in Oxfordshire have confirmed that

- Oxford’s growth should be constrained – reflected in the introduction of a Green Belt of 6.5-10km width around the City (Ref Central Oxfordshire Local Plan, Cherwell Local Plans 1996 and 2015 and 2011 Oxfordshire Structure Plan)
- An alternative strategy of Country Towns should disperse both housing and economic growth through the County

3.02 The current SEP identifies the need for growth at both Science Vale (south of Oxford), Oxford and within the Oxfordshire Knowledge Spine which extends to the north to include Bicester. Kidlington lies within the latter zone.

3.03 Employment allocations and a commitment to consider additional expansion of employment sites west of Kidlington are already addressed in the Adopted CDCLP and the 2016 SPD Masterplan for the village.

3.04 The Country Town strategy is therefore not incompatible with the SEP, the Adopted CDCLP and the adopted DPD (Masterplan) for Kidlington.

3.05 Green Belt designation is intended to (inter alia) permanently secure the separation of settlements, to check the unrestricted sprawl of large built-up areas and to preserve the setting and special character of historic towns- in this case the setting of Oxford. [NPPF P. 80]. In para. 034 of National Planning Practice Guidance (Stage 5 – Housing and Economic Land Availability Assessments), the question is put and the response is clear:

*“In decision taking, can unmet need for housing outweigh Green Belt protection?*

***“Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt.”***

In the NPPF, the advice is:

*‘Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.’*

3.06 KPC consider that exceptional circumstances have not been demonstrated in relation to the scale of need that should be accommodated in Cherwell District. All the sites now proposed for development are categorised as scoring high or moderate/high in importance in the Green Belt study, in respect of their performance in preventing neighbouring towns merging into each other (See Figure 4.3 Oxford Green Belt Study 2015). On this basis alone they should be excluded from further consideration for new development.

3.07 This is entirely consistent with the findings of the current Oxford City Preferred Options Local Plan, which states:

Preferred Option 31A.....

*Do not review the Green Belt boundary or allocate sites where the impact would be ‘high’.*

Rejected Option 31C, which suggested that all grades of Green Belt land should be considered for development, rightly concluded that:

*This approach is likely to have a significant harm to the overall integrity of the Green Belt in Oxford. The important functions, and ultimate aim of the Green Belt to protect Oxford’s setting would be significantly harmed.*

3.08 The later 2017 Cherwell Green Belt Study – by the same consultants – illogically downgrades the importance of some of the sites. However, it acknowledges that all land south of the railway and all land west of Kidlington scores high in terms of harm that would result from the release of sites for development. (See Figs 4.1 and 4.2 2017 GB Study.) Yet this is the land that is proposed to be developed. Cross boundary coordination must reflect shared values.

3.09 The proposed substantial reduction of the Green Belt is wholly incompatible with the strategic need for a Green Belt of sufficient width around Oxford, particularly at a time when the Oxford Local Plan proposes development on Green Belt sites within its administrative boundary to increase capacity, and has allocated land for development at the Northern Gateway close to Kidlington.



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- 3.10 The effects of the planned allocations would be to reduce the width of the Green Belt between the expanded settlement of Oxford and Kidlington to less than 1Km in places, in a location where much of the intervening gap is occupied by transport infrastructure. This is far too small when the separation is between two large settlements, and does not provide a meaningful Green Belt in the terms set out in the NPPF.
- 3.11 Only 14% of Cherwell District is subject to Green Belt policy – but KPC consider that land within the Green Belt, as supported by the NPPF, should be seen as the last resort for new development, when all other options have been proven to be unsuitable. While it is appreciated that Kidlington is a convenient direction of growth for Oxford, KPC does not consider that the necessity for development here has been justified.
- 3.12 KPC also finds the arguments set out in 4.16-4.17 of the Green Belt Study 2017 under the heading of ‘Fragile Green Belt’ are specious. To state that a case can be made for coalescence, whilst accepting the vulnerability and importance of the remaining gap, ignores one of the fundamental objectives of national Green Belt policy.
- 3.13 The Parish Council welcomes the retention of Green Belt designation on sites north of Kidlington, including land between the village and the River Cherwell, and the absence of development allocations in this area. Development north of Kidlington would have severe adverse impacts not only on land important to the integrity of the Green Belt and the character of the area, but would be likely to increase traffic movement through Kidlington, exacerbating existing problems of congestion and poor air quality.
- 3.14 KPC also welcomes the retention of Green Belt designation on Frieze Farm site.

**SUMMARY**

Complete opposition to the release of any land in the Green Belt which has been found to have a high or moderate high score when assessed against the essential Green Belt functions set out in the NPPF.

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**CHANGES**

Delete references to removal of sites PR3c, PR3d, PR6a, PR6b, PR8 from the Green Belt.

**Objection to Policy PR4b: Securing transport improvements to Kidlington Village Centre**

- 4.01 This policy is fundamentally platitudinous, and it is difficult to see that it will achieve any of the positive investment necessary. We suspect it will be ignored by developers.
- 4.02 The Policy is confined to addressing transport and movement issues, while the need is for far wider changes to improve the vitality, viability, scale and quality of services in the village centre. The adopted 2016 Kidlington Masterplan deals with these in more detail, but is limited to matching the restrained local growth anticipated in the adopted CDCLP.
- 4.03 If substantial new strategic developments are encouraged in the local area, it is essential that the village centre is assisted to both protect its valuable function in the light of competing new destinations, and to genuinely secure enhancements, rather than accept them if they are offered, as the current Policy suggests. The principals set out in the adopted Masterplan- to reinforce the role of the village centre and to protect the individuality and sense of identity of the settlement - underlines the requirement for proper integration of any new development.
- 4.04 KPC urges CDC to carry out a study to consider the impacts of the proposed new developments on the vitality and viability of Kidlington Centre as well as movement, and to include measures in the Plan to ensure its ability to thrive in the future, including investment where appropriate.

**CHANGE**

- Amend title to ‘Securing Transport and other improvements to Kidlington Village Centre’
- Replace ‘will be supported’ to ‘will be required’
- Add to Policy 4B (or 4A) a requirement for all new strategic developments in the area to contribute to enhancing movement in Kidlington Village centre.

**NEW BACKGROUND RESEARCH**

- 4.05 An assessment of the impacts of any proposed new large scale development on the vitality and viability of the village centre and movement around the village in the light of new development proposed, recommending new or enlarged facilities required, and ways in which necessary investment can be secured from new developments.

**Objection to Policies proposing development on land south of the railway**

**(a) Policies PR6a (East of Oxford Road), PR6b (Golf Course West of Oxford Road),**

- 5.01 These sites would perform as urban extensions to Oxford, physically linked to existing communities. Development of these sites would significantly narrow the important open countryside gap between Oxford and Kidlington, effectively creating the perception that Kidlington was not a separate village community, but a suburb of Oxford.
- 5.02 The combination of both sites, either side of the Oxford Road, currently provides a valued area of unlit open green space, and a distinct break in development between the City and surrounding villages, along a major entrance corridor to Oxford.
- 5.03 Evidence does not demonstrate that exceptional circumstances exist to justify a release from the Green Belt, where background studies confirm that both sites are of high importance to the integrity and function of the Green Belt. (See 2015 and 2017 Green Belt Studies)
- 5.04 Development on either or both sites would aggravate existing local congestion and air quality issues, and adversely impact on movement between Oxford and Kidlington.
- 5.05 The open character of the agricultural land east of Oxford Road forms part of the wider landscape which provides an important setting on the approach to Oxford. The landscape of the Golf Course is manmade, but long established, with significant tree belts and groups. It is unlikely to be able to preserve these features unless development is restricted to a low density and larger dwellings. As a result, there would be an inefficient use of an important large area, and potential viability difficulties in accommodating 50% affordable housing. The net benefits do not outweigh the substantial harm to local character.
- 5.06 The Golf Course is also a local recreation facility, and KPC consider that its loss is unlikely to be offset by a new Golf Course on a significantly smaller site at Frieze Farm. Development on this site conflicts not only with NPPG Green Belt Policy, but also with paragraph 74 of the NPPG, which seeks to prevent the loss of recreation facilities.

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Indeed, site owners/promoters have recently made a presentation proposing 600 houses on the Frieze Farm site, and have no apparent intention of creating a new Golf Course. (See representations on Policy PR6c)

**(b) PR3c and Parkway site PR3d.**

- 5.07 Policy PR3c removes GB status from the small wedge of land west of PR6b and south of the railway, although no development is as yet proposed on this site. Once the GB designation is removed however, the site might in the future be capable of development under the terms of Policy PR12b, bringing the northward expansion of Oxford unacceptably close to Kidlington.
- 5.08 It is proposed to remove GB designation from the Water Eaton Park and Ride/Parkway site PR3d. KPC fear that this could pave the way for a wider range of additional buildings, reducing the open character of the site, further weakening the break in development between Oxford and Kidlington, and adversely impacting on the separate identity of Kidlington which is fundamental to the adopted Kidlington Masterplan and the Local Plan.

**SUMMARY**

Retain Green Belt Policy on all the above sites, and do not allocate for development.

**Objection to Policy PR6c - Potential new golf course at Frieze Farm**

- 6.01 KPC consider that the suggested use of this land as a replacement high quality rural character Golf Course is unrealistic, as the site is too small. It is also a fairly featureless open parcel of land, where formal golf course development would require years of maturity in planting to deliver a scheme compatible with the open character of the Green Belt.
- 6.02 The site remains in the Green Belt, and this is strongly supported.
- 6.03 If the site was removed from the Green Belt under pressure from other participants/site owners, once the idea of a new golf course is abandoned, alternative development could follow under the provisions of Policy PR12b. Indeed, site promoters have recently publicised a proposal for a 600 unit housing scheme on the site, and appear to have no interest in providing a new Golf Course. This proposal for a golf course appears to be ill-founded.
- 6.04 The location of this site means that it would be a freestanding housing development, integrated with neither Oxford or Kidlington, and probably of insufficient scale to fund on site community provision. This would be an unsustainable form of development, encouraging travel to essential infrastructure such as schools, contrary to the spatial strategy of the adopted Local Plan.

**SUMMARY**

- KPC supports the retention of Green Belt designation on PR6c.
- Request Deletion of policy support for Golf Course use

**Objection/Amendment - Policy PR7a – land south east of Kidlington**

- 7.01 KPC concurs with the Plan on this Policy, and considers that development on this site could reasonably be considered as an extension to Kidlington, securing a permanent green boundary. While its removal from the Green Belt is regrettable, if justified as exceptional circumstances by PR1, its release could bring long term benefits, offsetting the loss of green belt land with a well-integrated village extension of modest scale, compatible with the character of Kidlington.
- 7.02 However, the policy needs to be amended to require the footbridge link as described in P 5.96.
- 7.03 This site and others around Kidlington including PR7b (Stratfield Farm) should also be required to contribute to improved access arrangements for Stratfield Brake, which have long been identified as unsatisfactory, necessitating longer journeys along congested roads. A new spur to provide access direct from the roundabout is recommended.
- 7.04 Otherwise, general support for this allocation.

**CHANGES**

Add to key Delivery Requirements

- Contributions to footbridge link
- Contributions to improved access to Stratfield Brake



**Objection/Amendment to Policy PR7b – Stratfield Farm**

- 8.01 KPC concurs with the Plan on this Policy, and considers that development on this site could reasonably be considered as an extension to Kidlington, securing a permanent green boundary. While its removal from the Green Belt is regrettable and only to be encouraged if exceptional circumstances are demonstrated, its release could bring long term benefits, offsetting the loss of green belt land with a well-integrated village extension of modest scale, compatible with the character of Kidlington.
- 8.02 This site and others around Kidlington including PR7a (Land south-east of Kidlington) should also be required to contribute to improved access arrangements for Stratfield Brake, which have long been identified as unsatisfactory, necessitating longer journeys along congested roads by local users of the facility. A new spur to provide access direct from the roundabout is recommended.
- 8.03 Otherwise, general support for this allocation.

**CHANGES**

Add to key Delivery Requirements

- Contributions to improved access to Stratfield Brake recreation/sports ground

**Objection to Policy PR8 – Begbroke expansion (Land East of A44)**

- 9.01 KPC consider that the huge development proposed will have a major adverse impact on the separate identity of Kidlington, which has led the approach in the development of the Adopted Kidlington Masterplan and is confirmed as important in the adopted Cherwell Local Plan. Cherwell Local Plan 2011-2031 Policy ESD 14 aims to prevent the coalescence of settlements and has a strong role in preventing the coalescence of Yarnton, Begbroke and Kidlington.
- 9.02 It will also eradicate the open landscape character of the setting of both Begbroke and Kidlington, and reduce to a meaningless scale the Green Belt in this area. The parcels of land to be developed include land which is rated as of high importance in the Green Belt Studies, where in principle new development is unacceptable.
- 9.03 The minimal separation distance between Kidlington and the expanded Begbroke will not prevent intervisibility and a perception of coalescence, contrary to the clear objectives of the adopted CDCLP. There is substantial concern that the development would neither be well integrated with Kidlington, or constitute a genuinely free standing village, due to proximity and intervisibility.
- 9.04 The proposed scheme is of a scale which warrants its own new centre, but is so proximate to Kidlington Village Centre that it will also act as a competitor in providing local services, and thus undermine the published commitment to investment in this established centre. This matter does not appear to have been considered in developing the strategy.
- 9.05 CDC is asked to undertake an urgent assessment of the impact of this substantial allocation on the vitality and viability of, and improvement strategy for, Kidlington Village Centre. A Policy should be developed which promotes and secures investment in the Village Centre if the scheme goes ahead, and this needs to be reflected in the Key Requirements list in the Policy.
- 9.06 KPC has concerns about the proposed closure of Sandy Lane. This currently provides a much valued westward link from Kidlington to Begbroke, linking the communities. It is appreciated that if kept open it could provide an undesirable rat-run for traffic from the new development, adding to traffic congestion in Kidlington, but it currently enables Begbroke residents to make use of the Village Centre amenities, and thus

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support the well-being of the village. A more detailed assessment of the benefits and problems of the proposed closure is required, and mitigation measures developed and required as part of the implementation strategy.

9.07 If adopted, the Policy should be extended to require substantial investment in offsite transport infrastructure, by reference to Policy PR4a. Without this, it is unlikely to be sustainable and will add to local congestion.

**SUMMARY**

- Strongly object to PR8 allocation
- Request revisions/addendums if adopted

**Objection to Policy PR11 - Infrastructure**

10.01 Local infrastructure, particularly all types of movement infrastructure, is already deficient in the area. With regard to transport infrastructure – a primary concern in view of the acknowledged congestion and air quality problems locally- the KPC has little confidence that the aspiration for a new railway halt as referred to in Policy PR8 will be delivered. Residents on new developments at Begbroke, Yarnton and Kidlington would largely rely on buses and to a lesser extent cycles as the alternative to private cars for local journeys.

10.02 The Infrastructure Schedule at Appendix 4 is largely silent on essential information on programmed delivery, and must be seen as aspirational. Helpfully, it does confirm that the majority of projects listed are critical to successfully delivering accessible and sustainable development. There is however little evidence of success in recent years in securing Government investment in transport improvements despite active joint working, and economic circumstances are not auspicious for the future.

10.03 The Montagu Evans Viability Study notes that these external/off site costs are not taken into account in site assessments.

*‘As is typical for the development of an area, a number of non site specific infrastructure elements form part of the delivery package. In the case of non-site specific infrastructure, most items are reliant on third party funding. Although some costs towards these work may be drawn from property development, the expectation would be that largely – if not in entirety - the costs would be borne externally.’*

10.04 The Viability Study also is ambivalent/uncertain as to whether higher levels of Affordable housing can be delivered on all sites.

10.05 In the view of KPC, the Plan will be an enormous failure if it removes land from the Green Belt only to see an insufficient delivery of affordable housing, or new development without supporting critical infrastructure, contrary to the Plans objectives of delivering sustainable development.

**SUMMARY**

- An Infrastructure Delivery Plan, rather than a wish-list as in Appendix 4, is essential in order to deliver sustainable development.

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- Policy PR1 should include an additional requirement that all new allocated development makes adequate provision for all relevant infrastructure, unless other arrangements have been secured. Development should not proceed in advance of certainty about the delivery of off site infrastructure.

**Objection to Policy PR12b – Non allocated sites**

12.01 The Council notes that the general thrust of PR12b is to provide a vehicle for additional sites to be released in the future. The retention of GB policy on unallocated land is thus very important.

12.02 KPC is extremely concerned that the Policy makes provision for the release of unspecified sites in the future on the basis that they are sites listed in a HELAA. This for example would include Frieze Farm, and land to the north of the village. These sites have been discarded for valid reasons in the Plan, which KPC fully supports.

12.03 As the purpose of the plan is to address only the identified unmet needs of Oxford City, once these have been met and confirmed as genuinely deliverable, as will be tested at the Examination, there is no need for a contingency Policy in this Plan.

12.04 If adopted however, this Policy resists the release of additional sites unless they satisfy a long list of requirements, in which circumstances they can be approved. Included is the clause:

*4. that prior consultation has been undertaken with the local community in a form to be agreed with the Council and the proposed development has the demonstrable support of the local community*

12.05 The Parish Council is concerned about the uncertainty inherent in this Policy regarding local support – who will decide what is ‘the demonstrable support of the local community’? As KPC members are the elected representatives of the local community, it would be much clearer if it was amended to include reference to the support of the affected Parish Council(s).

12.06 Policy PR12b fails to require 50% affordable housing on any unallocated sites. This is inconsistent with the Plan objectives and the approach on allocated sites. This requirement should be added within the first part of the Policy.

**CHANGES**

- Delete Policy PR12b, as contingency sites are not required to meet Plan objectives
- If adopted, support clause 4, amended to include a requirement for the demonstrable support of the relevant Parish Council.

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- If adopted, include as an essential requirement 50% affordable housing on any new unallocated sites