

**Planning for Cherwell – the Cherwell Local Plan Review
Community Involvement Paper 2: Developing our Options
September 2021**

Representation Form

Cherwell District Council has prepared a document called *Community Involvement Paper 2: Developing our Options* which is the second stage of consultation to inform a new district wide Local Plan.

This consultation paper sets out what has changed since we first consulted, and the current options we are considering for preparing the Cherwell Local Plan Review. There will be other options we will need to consider as we progress, and other plans and programmes become firmer. Some of the options we have identified may also need refinement.

This stage of plan making is about developing our thinking and gathering evidence. The responses to this consultation are an important part of that process and will help shape our new Local Plan. Having previously consulted on issues, we once again wish to ensure that a wide cross-section of views is obtained in identifying and examining our development and policy options.

We are also inviting comments on our emerging evidence base, including an Interim Sustainability Appraisal Report.

These documents are available to view for comment from **Wednesday 29 September 2021 to 11.59pm Wednesday 10 November 2021.**

To view the Community Involvement Paper 2 (Developing our Options) and the accompanying Interim Sustainability Appraisal Report and other evidence documents please visit letstalk.cherwell.gov.uk/cherwell-local-plan-2021. **Please note you can also complete this representation form online.**

Hard copies of the Options Paper and Interim Sustainability Appraisal Report are available for viewing during opening hours at our advertised deposit locations which include Bodicote House, and libraries across the District.

How to use this form

Please complete **Part A** in full.

Then complete **Part B for each question you wish to comment on.**

PLEASE NOTE THAT ANONYMOUS OR CONFIDENTIAL COMMENTS CANNOT BE ACCEPTED. ANY COMMENTS RECEIVED WILL BE MADE PUBLICLY AVAILABLE.

The information you provide will be stored on a Cherwell District Council database and used solely in connection with the Cherwell Local Plan Review.

Representations will be available to view on the Council's website, but address, signature and contact details will not be included. However, as copies of representations must be made available for public inspection, they cannot be treated as confidential. Data will be processed and held in accordance with the Data Protection Act 2018.

Your details will be added to our mailing list which means that you will be automatically notified of future stages of the local plan preparation process. If you subsequently wish to be removed from our mailing list, please contact us.

Please return completed forms:

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

Or by post to: Planning Policy Team, Planning Policy, Conservation and Design, Cherwell District Council, Bodicote House, Bodicote, Banbury, OX15 4AA.

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If you have any questions about completing the form or accessing documents, please telephone 01295 227985 or email planning.policy@cherwell-dc.gov.uk.

PART A

	Details of the person / body making the comments	Details of the agent submitting the comments on behalf of another person / body (if applicable)
Title	Mrs	
First Name	Kirsty	
Last Name	Buttle	
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PART B – Please complete Part B for each option/question you wish to comment on

OPTION 1: VISION – Do you have any observations on the suggested Vision?

Visions can be identified as a thoughtful and measured consideration of the future viewed through a variety of different scenarios.

The success of this Cherwell Local Plan Review will be measured in delivering the right housing to the right people in the right places at the right time. Decisions must be delivered through a secure and robust evidential base, rather than the speculation of developers.

OPTION 2: KEY OBJECTIVES - Do you have any observations to make on the draft objectives? Which do you consider are the most important?

Seeking to rationalise the complex nature of the Cherwell Local Plan Review into themes and objectives is a major challenge in itself, with the added requirement to present them in a manner which is broadly accessible to the non-specialist.

The inter-connectivity of multiple objectives makes any decision regarding relative importance dangerous given that any range and value of priorities identified for a particular set of circumstances is unlikely to have universal application.

OPTION 3: LOCATION OF EMPLOYMENT LAND -Where do you think employment land should be focused to deliver the jobs needed in Cherwell?

- 1) At our main urban centres of Banbury, Bicester and Kidlington
- 2) At significant transport interchanges
- 3) Mostly on previously developed land, including in less sustainable locations
- 4) At the larger villages
- 5) A combination of all of the above options

Option 5 would appear to be the pragmatic choice, as it embraces the other options while continuing to offer a range of flexibility.

There are clear advantages in continuing to utilise the existing urban centres of Banbury, Bicester and Kidlington with their already established transport connectivity, likely to be further enhanced through the development of Oxford-Cambridge Arc.

The use of previously developed land will clearly reduce the negative impact of further employment development on the rural landscape, but may offer insufficient land area. It should also be recognised that the rural economy is also a significant element of the rural landscape in itself, and is likely to experience further innovative development.

In seeking additional development land in the larger villages, there is an inevitable possibility that the essential character and heritage of the village may be entirely consumed by the development and associated infrastructure.

OPTION 6: RATES OF AFFORDABLE HOUSING - Should we

- 1) Increase the percentage requirement of affordable housing required on housing developments of 10 or more units?**
- 2) Keep the percentage levels of affordable housing the same as in the 2015 Local Plan? (30% at Banbury and Bicester, and 35% across the rest of the District)**

More inclined to the second choice, but ensure that these percentages are met in full with actual housing units.

With the identified on-going pressure for affordable housing, it is essential that the provision is made where the local need is identified rather than as an afterthought in the provision of development sites.

OPTION 7: AFFORDABLE HOUSING TENURE - Should we

- 1) prioritise the provision of social rented housing above other affordable housing tenures?**

2) Keep the same affordable housing tenure mix as set out in the 2015 Local Plan with 70% Affordable and Social Rent and 30% Social Rent?

Essential to identify the need and then prioritising that need rather than the mere application of an arbitrary formula.

OPTION 8: HOUSING INTERNAL SPACE STANDARDS - Should we:

- 1) Introduce a policy which requires all new dwellings to meet the nationally described space standard and if so, should this be a minimum requirement?**
- 2) Introduce a policy which only requires affordable homes to meet the nationally described space standard and if so, should this be a minimum requirement?**

Option 1 as a minimum requirement. Option 2 could be identified as discriminatory.

QUESTION: HOUSING POLICIES - Are there any other housing policies we should include in the Plan? For example, is there a need to support alternative methods of construction (e.g. modular homes)?

Provision for developing alternative methods of construction merit on-going review to investigate all aspects of the construction process eg efficient use of materials, innovative building techniques, thermal efficiency, thereby contributing to a positive awareness of climate change and the creation of new heritage environments for the future.

OPTION 10: SUSTAINABLE CONSTRUCTION - Should we

- 1) Not set further standards in the Cherwell Local Plan leaving this for Building Regulations and the Oxfordshire Plan. or**

- 2) **Set sustainable design and construction standards for new residential and non-residential development that only meet standards set by Government. or**
- 3) **Set sustainable design and construction standards for residential and non-residential development in Cherwell above those required by Central Government?**

Option 3 could be identified as aspirational if the objective is to identify and achieve the highest quality for our residents. However, such aspiration may be significantly moderated by the implementation of relevant national guidelines.

QUESTION: RETROFITTING OF HISTORIC BUILDINGS - How should we address the challenges of retrofitting existing building stock balancing this against the need to protect historic buildings?

Listed buildings were built within the limits of construction methods, materials and lifestyle which were appropriate to the locality at that time. Such an approach is unlikely to meet modern energy efficiency requirements. In general, owners of listed buildings value their character and heritage, and are willing to accept some limitations to energy efficiency in order to preserve that identified character and heritage. The bespoke approach identified (para 5.5) would seem both advisable and reasonable, with a healthy dose of common sense being utilised by all parties.

OPTION 11: RENEWABLE ENERGY - Should we

- 1) **Identify and allocate specific sites for renewable energy generation**
- 2) **Use a criteria-based policy to assess the appropriateness of proposals for renewable energy generation?**

The paragraphs in 5.5 on 'What you told us' properly reflect a range of views. Although that can often only serve to perpetuate arguments 'for' and 'against' which can verge on self-indulgence at a time of crisis, CDC are clearly listening. The paragraphs in 5.5, in our view, are already well-developed and ambitious.

Many of the measures proposed in this section concern local responses to the very real and very pressing climate crisis, although it would be hard to guess the urgency from the section's title 'Mitigating and adapting to Climate Change'.

Responding to the crisis:

The measures proposed do not always convey the scale of the crisis that confronts us. They are all necessary, and are much needed. In the rush to develop ‘green growth’, which is where the predominant emphasis is placed in this section, we wish to highlight the fact that reference to an equally significant diversity crisis impinging on all of us is presently almost entirely missing in the present document, except for Option 13.

QUESTION: POLICIES FOR CLIMATE CHANGE, SUSTAINABLE CONSTRUCTION & RENEWABLE ENERGY -

Are there any other policies that you think are required to help support the approach to managing climate change?

In June 2021, MPs on the Environmental Audit Committee published a new report on the UK’s footprint on global diversity to put alongside the global climate crisis, acknowledging the long-awaited Dasgupta Review, commissioned originally by the UK Treasury in 2019, which demonstrated conclusively that the last few decades of human prosperity have taken a ‘devastating’ ecological toll. ‘Solving climate change’ by achieving net zero carbon in itself is a part, but only a part, of the response which this double crisis requires of all of us – and certainly not simply a means of recovering economic growth and calling that ‘green’.

Redressing the ecological toll:

The Review estimated that we would need 1.6 Earths to maintain humanity’s current way of life. That is *our* way of life, a consumption-oriented way of life which is as predominant in Oxfordshire’s towns and villages as anywhere else – and is presently not addressed in this section of Cherwell’s Review at all, except as a policy issue in Option 13.

Two years on, the members of the Environmental Audit Committee put their own estimate of our present requirement as equivalent to 2 Earths. David Attenborough’s comment at the time could not have put it more starkly: “If we continue this level of damage, whole ecosystems will collapse.”

Development:

From this perspective, truly sustainable economic development would mean recognising that our long-term prosperity relies on re-balancing our presently profligate demand on Nature’s ‘goods’ and ‘services’ with its capacity to supply them.

It also means that Cherwell, and indeed all Councils, would need to account fully for the impact of our interactions with nature – one of the principle calls of the Government’s Dasgupta Review. But any natural capital assessment as proposed in Option 13 needs to go beyond demonstrating impact to prevent its happening.

This is not presently the use of the term 'development' in this review – which for the greater part is taken to mean housing development, or the increased provision of services. As a Parish Council, we feel it should be a policy priority in this section of the Options Paper to clearly differentiate this more general use of the term from the much stricter requirements of ecologically supported development.

The regenerative capacity that those requirements would safeguard should be upheld as strongly as any of the other pre-occupations that presently feature in this listing of Cherwell's Key Choices – and could properly be seen as the pre-condition for any one of them.

A footnote on presentation:

The review would gain significantly from the provision of supporting links where appropriate to explanatory video footage of the issues involved and the scale of the crisis that is confronting us as a civilisation. The review is supported with photographs and diagrams, but is presently overwhelmingly word based. As a contribution to that recommendation, and in support of the proposition presented in these last few comments, we commend the following short video clip commissioned by HM Treasury as part of the Dasgupta Review:

<https://www.cam.ac.uk/stories/dasguptareview>

OPTION 12: BIODIVERSITY - Where biodiversity net gain or compensatory measures cannot be achieved on site, should we:

- 1) Secure as close to the site as possible**
- 2) Prioritise within Conservation Target Areas/those parts of the Nature Recovery Network where habitat creation and restoration is to be focused**
- 3) Secure contributions to local environmental bodies undertaking biodiversity enhancement projects within the district**

Having concluded that an acceptable solution cannot be achieved on site, the base line for further action will be determined by reference to the criteria identified through the initial site assessment. Objective comparisons can then be made against the base line criteria to determine where the required biodiversity net gain / compensatory measures can be achieved.

We certainly support Proposal 3) that the Council should secure contributions to local environment bodies undertaking biodiversity enhancement projects within the district.

OPTION 13: NATURAL CAPITAL - Should we:

- 1) **Include a policy in the Plan requiring major development proposals to be supported by a natural capital assessment to demonstrate the impact of the proposals; or**
- 2) **Include a policy in the Plan requiring major development proposals to:**
 - a) **be supported by a natural capital assessment to demonstrate the impact of the proposals and**
 - b) **demonstrate environmental net gain; or**
- 3) **Not require major development proposals to be supported by a natural capital assessment.**

We are supportive of Option 2) here. Major developments, by their very nature, are likely to have a significant impact on the natural environment. It is encouraging to note that much work has already been undertaken in mapping Oxfordshire's natural capital (para 5.7.10). The use of this evidence at a more detailed local level to both demonstrate the potential impact of major development proposals and possible environmental net gain (para 5.7.11) will generate a greater understanding and awareness for all parties, and provide the basis for bold initiatives to interrupt the presumption in favour of economic growth and ensure that any development is ecologically sustainable.

QUESTION: BIODIVERSITY & THE NATURAL ENVIRONMENT - Do you have any views on policies for inclusion in the review of the Plan on biodiversity and the natural environment?

The example identified (para 5.7.12) offer an additional range of important areas which require detailed understanding within a structured overview of biodiversity and the natural environment. Clearly, it will be appropriate to embrace such further detail as may be required by national legislation within the Environmental Bill.

OPTION 14: CHILDREN'S PLAY - Should we:

- 1) **Continue to provide children's play facilities through a traditional minimum provision LAP/LEAP/NEAP approach**
- 2) **Provide children's play facilities through minimum provision combined all-age areas of play**

3) Seek opportunities to integrate play facilities throughout towns and developments identifying minimum standards and setting expectations through design and other place making policies e.g. inclusion of pocket parks, play streets and informal play within open space areas.

In small village locations, an important first step should be an assessment of the existing provision for all age groups, linked with a consultation exercise to identify the residents` priorities. This will offer a baseline data set for the proposed development site which will be further informed through due consideration of the anticipated residential profile. A simple application to identify minimum provision through LAP/LEAP/NEAP approach appears to promote administrative convenience at the expense of rational and constructive dialogue.

QUESTION: PROTECTING THE HISTORIC ENVIRONMENT – Are there any specific policies for heritage and protecting the historic environment that we should include?

As indicated (para 5.10.4), local heritage assets do make an important contribution to the nature and character of their environment, both for now and for future generations. The creation and delivery of policies to formally protect such assets (para 5.10.6) is strongly supported.

QUESTION: ACHIEVING GOOD DESIGN & ‘BEAUTY’ – How can the local plan best support improvements in design and target local design codes/guidance that follow?

Merely to determine the design of places as “beautiful’ implies a very subjective judgement and lacks precision – one person`s considered view of beauty can easily be another`s version of extreme ugliness.

All potential development sites, both big and small, will be located within areas which already exhibit local character through previous design, use of materials, existing land use, historical context.

The basic concept of design codes and guides offers an option for considered review, but also could be seen as overly restrictive.

An attempt to impose a national design guide and model design code would seem to ignore the diverse nature and character which is to be found throughout the country, or could be so vague within its terms and conditions as to be liable to ambiguous interpretation.

The different character of the towns, villages and rural areas within Cherwell reflect a unique heritage, which also contributes to the Oxfordshire Plan.

While the option to devise and implement design and advice codes for individual small development sites may be unrealistic, it may be that an overall district-wide implementation could be viewed as simplistic in failing to acknowledge significant local variation.

Perhaps priority should be targeted at the local level, thereby offering an overview which is able to reflect a closer understanding and awareness of relevant matters. A combination of the identified local levels will provide a sensitive and relevant document which fully embraces and informs Cherwell's on-going development options.

In adopting a local level approach, it is acknowledged that individual localities will have to be clearly identified.

QUESTION: TRANSPORT & CONNECTIVITY –

- **Do you agree with the proposed transport and connectivity approach to support the Local Plan Review?**
- **Should the approach be different for the rural areas, for example focusing on low carbon technology rather than a reduction in the need to travel?**
- **What measures would help you drive less or use alternative transport modes with lower emissions?**

Many rural communities are found in areas where narrow roads and tight bends, often without a pedestrian footpath, are dominant features. Access to major highway provision and public transport is severely restricted, meaning that personal transport is an essential element of access to urban areas – work, shopping, recreation.

The need for comprehensive electric and hydrogen charging facilities, both public and private, IS VITAL.

OPTION 16: DIGITAL INFRASTRUCTURE - Should we

- 1) Provide a policy with the requirements expected from new development to provide digital connections and be designed to accommodate future digital infrastructure needs (future proofing).**
- 2) Provide a policy protecting existing telecommunications infrastructure.**
- 3) Provide a criteria-based policy on the location and mitigation requirements for telecommunications development.**

It must be acknowledged that society is currently experiencing a digital revolution which, in many ways, will have an impact on our lives comparable with the Industrial Revolution. Already, new digital initiatives are deemed obsolete within a very short time frame.

While it may be difficult to project long-term into the digital future, it would seem negligent not to require all new development to be future proofed, within the context of the best available information available at that time.

The recent growth in working from home appears likely to become an established element in the desire of many families to achieve a closer harmony in their work/life balance. While local authorities may seek to achieve a measure of control in the location and mitigation requirements for telecommunications development, current practice suggests that the direction of travel for such development is likely to be determined at national level.

QUESTION: TRANSPORT POLICIES –

Do you agree with the range of policies and documents we have identified?

Are there any transport-related policies that we should consider through the Local Plan Review?

In rural areas, where roads are frequently narrow with many difficult bends, personal transport is likely to remain dominant. With the increasing requirement to reduce pollution and enhance air quality, a comprehensive charging infrastructure (electric and hydrogen) is essential.

OPTION 17: INFRASTRUCTURE DELIVERY - Should we:

- 1) update the methodology to consider social and environmental benefits of schemes and the contributions they make to Climate Action, Healthy Place Shaping, and a Sustainable Economy?**
- 2) Retain the current methodology?**

And, should we:

- 3) Continue to prepare the IDP by place or**
- 4) look at areas by catchment and how accessible they are?**

When considering any revised methodology for the Infrastructure Delivery Plan (IDP) it will be important to identify a known base level as a starting point ie to have a comprehensive record of the current situation which will form a factual basis for further consideration, avoiding the potential for seeking solutions through administrative convenience.

The reference to grouping infrastructure by its catchment area (para 5.13.7) could offer an interesting perspective on connectivity, although the lack of scale identified for such catchment areas, as potentially applied to rural areas ,is a significant omission.

OPTION 18: HOUSING & EMPLOYMENT GROWTH AT BANBURY - If Banbury is identified as a location for growth, should we:

- 1) Consider further urban extensions into the open countryside.**
- 2) Limit development at Banbury to protect its landscape setting and maintain separation between the town and surrounding villages**
- 3) Focus development at an existing or new settlement well connected to Banbury**

Banbury`s location has a limiting factor on future development due to the close proximity of the Northamptonshire and Warwickshire county boundaries. Interestingly, the locally used phrase “Banburyshire” does not identify this distinction.

Rather than be restricted by existing county boundaries, an active dialogue with both Warwickshire and Northamptonshire could lead to innovative options for mutually beneficial housing and employment growth. Warwickshire and Northamptonshire already

demonstrate an example of such active and innovative dialogue through their actions around the DIRFT project near Rugby.

Given the known problems associated with the M40 Junction 11, perhaps serious consideration could be given to creating a new M40 access. This would help to alleviate the current Junction 11 congested access to and from Banbury, and offer further development opportunities for housing and local industry with enhanced connectivity nationally.

Active consideration could be given to the possibility of relocating the railway station, helping to alleviate another traffic hot spot and generating a significant brown field area for appropriate redevelopment.

OPTION 19: BANBURY – DIRECTIONS OF DEVELOPMENT - If additional development is directed to Banbury requiring green field sites

Should we:

- 1) Consider sites to the north of the town.
- 2) Consider sites to the south of the town
- 3) Consider sites to the east of the town (including to the east of the M40 Junction 11)
- 4) Consider sites to the west of the town?
- 5) A combination of any of the above

We would welcome views on any specific sites identified through the call for sites, or suggestions for new sites.

Such development is likely to be particularly impacted by the main road layout – M1, A422, A361 – and access to rail links.

In the parish of Sibford Gower, two areas of land (LPR-A-107) have been identified as potential areas for residential development. We have considered these proposals in the context of: the current and proposed planning guidance; specific site-related issues; the views of the community. **OUR CONCLUSION IS THAT THE PROPOSALS ARE TOTALLY INAPPROPRIATE AND SHOULD NOT BE INCLUDED WITHIN THE REVISED LOCAL PLAN.** The following highlight the matters we have considered in reaching this conclusion.

A Generic Planning Issues:

Siting

The two sites are located to the east of Pound Lane and to the north, but not contiguous with the heart of the village and its conservation area. The parcels of land have a total site area of 12.26 hectares (8.06 and 4.2 hectares respectively) and are currently devoted to agriculture. The fields are enclosed with mature tree lined hedgerows.

Topography and Visual Impact

The land, which forms an elevated ridge, is situated between 205 and 210m in height (data from Ordnance Survey) and, as such, forms one of the hills in the area referred to as Ironstone Downlands. It is part of a wider composition of hills that also includes Long Hill, Yarn Hill, Epwell Hill, Gallow Hill and Brailes Hill. Whilst lying just outside the Cotswolds AONB (Area of Outstanding Natural Beauty), the ridge along which the suggested development sites are located works in parallel with the distant ridge to the west (the location of Broadway Tower). Together, these two areas of high ground help to cradle the gently undulating landscape of the AONB and its environs with only occasional buildings interrupting the scene.

Totally Inappropriate scale

Whilst at this stage no numbers are associated with the two parcels of land submitted as potential development sites, it is possible, using industry recognised norms, to consider broad development strategies and calculate outline numbers of potential residential units and the population they would support. Thirty residential units/hectare is a possibility and simple arithmetic indicates that this could generate over 350 dwellings with a related population potentially in excess of 700. Recent (2019) figures from the ONS (Office for National Statistics), see Parish Profile, indicate that Sibford Gower has a population of 533. Using these calculations would increase the village by 131%. Any development of this nature would be significantly out of scale with the current settlement and contravene CDC's current planning strategy 'limiting growth in rural areas and directing it towards larger and more sustainable villages'.

Development of any scale in this location is totally inconsistent with the planning/development strategies currently being promoted by Oxfordshire County Council and Cherwell District Council (see Oxfordshire Plan – Regulation 18 (Part 2) Consultation Document and Cherwell Local Plan review, Planning for Cherwell Community Involvement Paper 2: Developing Our Options, Sept 2021).

Sustainability

The location of the proposed development sites means that car journeys will always be necessary to access employment, retail and other primary services in the main centres of Banbury, Chipping Norton or Shipston on Stour. Therefore, in transport terms, the proposed development sites cannot be considered 'sustainable' and will increase rather than reduce the need to travel. In fact, looking at consequent and necessary travel movements, the proposed sites are likely to generate some of the least sustainable traffic movements of any rural development in the area.

Clear inconsistency with existing and proposed planning and development policy

The following documents address a broad spectrum of issues, either by making reference to adopted policy or the suggested policy revisions under consideration. They promote certain approaches to future development and it is strongly believed that the inclusion in future development plans for the two areas of land in the parish of Sibford Gower (ref: LPR-A-107) as potential areas for residential development is entirely inconsistent with the approaches advocated and required to be applied. In particular, the following documents are relevant, but many other examples could have been selected.

Guide new development onto the most sustainable locations

(CDC ref KO 23: Focus development in Cherwell's sustainable locations, making efficient and effective use of land, conserving and enhancing the countryside and landscape and the setting of its towns and villages).

(OCC ref Theme Five: Spatial Strategy Options, para 485 – To evaluate the options, we have identified what the three overarching objectives of sustainable development mean in an Oxfordshire context, and set them out as a set of criteria. There is a strong read-across between these criteria, Oxfordshire's Strategic Vision and this Plan's Vision & Objectives. 1 Guiding new development to the most sustainable locations. 2 using land effectively by planning positively for brownfield land and supporting urban regeneration. 3 Protection and enhancement of Oxfordshire's highly valued countryside and landscape.

Use land effectively by planning positively for brownfield land and supporting urban regeneration

(See notes above and OCC doc para 427 The Oxfordshire Plan proposes a strong brownfield land focus which means a reduced level of greenfield release with valued green space protected).

Limit growth in rural areas

(CDC ref Current Strategy para 4.3.1 The current strategy can be summarised as: Limiting growth in our rural areas and directing towards larger and more sustainable villages; Aiming to strictly control development in open countryside).

Oxfordshire's Strategic vision and this plan's Vision & Objectives, para 485: 3 Protection and enhancement of Oxfordshire's highly valued countryside and landscape.

Strictly control development in open countryside

(See note above and OCC doc Spatial Alternatives, July 2020 9 Protect environmental assets: identify environmental led constraints first (eg strategic blue green infrastructure, flooding, AONB and other sensitive landscapes, best and most versatile agricultural land) then place housing and employment where they avoid significant impacts and enable enhancements).

Protect and enhance Oxfordshires highly valued countryside and landscape

(OCC ref Policy Option 05: The Oxfordshire plan would establish a positive strategy for the conservation and enhancement of landscape and townscape features at a county-wide

landscape scale, taking account of topography, vegetation, tranquillity, light pollution, dark skies).

Reduce the need to travel

(OCC ref Theme 4 Policy Option 18 Sustainable Transport in New Development, Sustainable Development Principles, para 341 How development is planned and delivered impacts on the transport choices that new residents will make. Put simply, if development is planned around providing for private car use, with limited opportunities for residents to walk, cycle or use public transport, then less sustainable travel choices are locked in from the outset, and very difficult to change in the future. Given the contribution of transport to carbon emissions, this would make it very difficult for new development to both achieve required carbon reductions, as well as achieving wider objectives, in particular on health and wellbeing).

We believe that any development in the proposed location would very largely fail the above strategic criteria to be applied and that, therefore, the proposed sites (LPR A 107)n must be removed as designated sites for future development.

B. Site specific issues:

There are many specific local issues which we believe clearly mitigate against the use of this land for development. We note that no sustainability assessment has yet been undertaken of the proposed sites and would suggest that any such analysis would clearly show the proposed sites to be unsuitable for development. However, whilst reserving the right to identify other reasons in the future, the following site-specific issues are all major concerns:

Access and Movement

Whilst Pound Lane connects to the B4035 Shipston – Banbury road, this is only a low speed, low volume route and already has capacity issues.

Pound Lane is rural in nature, restricted in width, and with only 60m of footpath in the location of its single bus stop. The nature of the road, however, helps to reduce its impact as a transport corridor, and allows it to contribute to the overall character of the village. The poor nature of the road is recognised by the Highways Authority, and signs have recently been installed covering larger vehicles.

The only public transport is provided by an occasional and recently reduced bus service.

The nearest railway station is in Banbury, some 8 miles distant.

Though local residents do walk and cycle, this is generally within the village with challenging topography making such movement difficult between Sibford Gower and its neighbouring villages.

Pound Lane forms part of the Oxfordshire Cycleway. This is a route of regional significance for leisure cyclists and has been selected because of its rural character and low traffic volumes. An increase in vehicular movement would clearly be detrimental.

A high-level section of the d'Arcy Dalton Way is located close to the eastern boundary of the proposed development sites. This section of the nationally recognised long-distance

footpath was established to mark the Oxfordshire Fieldpaths Society Diamond Jubilee, and takes a meandering route across the Ironstone Downlands from Epwell to Hook Norton, before heading to the eastern Cotswolds. The footpath allows walkers to experience the open landscapes of the Ironstone Downlands, and any new development on the proposed sites would destroy this experience.

Primary Infrastructure

There is limited access to primary infrastructure.

Potable water is provided from a reservoir at Epwell. This is located at the highest point in the district and requires all water for the village to be pumped to this location before supplying the residences. Due to the height of the reservoir and local demand, water pressure and quantity is already an issue. Comments from local water supply engineers indicate that the current reservoir should already have a significantly greater capacity than currently exists. (Additional infrastructure provision can, of course, be provided, but the significant costs related to such additional provision are likely to ensure that any development is `maximised` in order to cover such additional costs).

The main length of Pound Lane has no main foul sewer, making access to drainage difficult. The village is served by a small sewage treatment plant (STP) located in a steep valley to the south of the main settlement. This STP has limited capacity and is unlikely to be able to accommodate any significant increase in foul sewage, its location makes any increase in size very difficult. The outfall from the STP passes into the network of brooks which eventually flow south and west to form the River Stour. Any poor-quality outfall from the STP would have a negative impact on this important network.

Any increase in surface water runoff is a major issue. Currently, as greenfield land with a porous substrate, any rainfall will quickly filter through the soil, creating very little `runoff`. Any development containing roads/footpaths/drives and roofs means that water quickly flows off these surfaces and is not absorbed into the ground. Given that the proposed development sites are located on top of a hill, on-site storage in `swales` is very difficult. Any surface water directed off the site will head south and eventually run into the network of brooks which eventually form the River Stour. This river already creates flooding issues within downstream settlements such as Shipston on Stour. Any substantial built development in the upstream catchment areas will only exacerbate an already difficult situation. (An accepted `rule of thumb` indicates the 1 inch of rainfall falling on open landscape will generate 750 gallons of surface water runoff, whilst 1 inch of rain falling on roofs/hard paving generates 27000 gallons).

Street Lighting

There is an absence of street lighting. This is not a negative issue, but one actively promoted by the village to retain the rural character of the area and, most importantly, to allow the retention of `dark skies` and the benefits this offers. It is highly likely that any new development would destroy the `dark skies` nature of the village and create a dome of light on one of the highest points of land in the area.

Micro climate

The height of the hills of the Ironstone Downlands and their exposed nature is sufficient to create a distinct micro-climate. This results in significantly lower winter temperatures and higher amounts of snow. Given the rural nature of the highways, access in and out of the village is difficult at such times, and is frequently reliant on the good nature of the agricultural community to use their equipment to clear snow and re-open the roads. Of note, the original settlement of Sibford Gower was built on the south facing slope to the south of the proposed development areas. Here the dwellings used the higher ground immediately to the north to provide a degree of protection from the cold north and east winds, as well as benefitting from their south facing aspect. Such issues of site planning are equally valid today, and development located in an exposed location would require substantial additional measures to enhance their energy efficiency.

Lack of understanding of agricultural activity

Whilst the community of Sibford Gower is engaged in a wide range of pursuits, agriculture lies at its heart. This activity is embraced by the local community who generally live comfortably alongside the regular agricultural needs to move large equipment along narrow lanes, or, at times of harvest, collect crops when weather permits rather than between working hours recognised by other pursuits. In locations with similar profiles to Sibford Gower, evidence exists that when new communities are established, frustration with existing agricultural activity can arise and, in due course, lead to conflict.

Loss and degradation of the immediate and wider landscape

Construction on the proposed development sites would result in a direct loss of high-quality agricultural land, damage to the network of hedgerows and trees which enclose it and loss of water to the immediate water table. The location of new buildings in such a prominent location would have a detrimental effect on the visual qualities of the wider landscape. The Parish Council Profile makes reference to the quality of the village environs through the Landscape and Visual Impact Assessment Village Analysis 2016.

Needs

It is vital for the village to have the ability to develop and re-shape itself to meet current requirements based on local needs rather than speculative development. It is important that any additional development is achieved in an incremental manner which responds to and respects the current nature of the village.

Taking all of the above into consideration, we do not believe that the two sites offered for development through the `Call for Sites` (ref LPR-A-107) are suitable, and, therefore, should not be included in the Local Plan as areas for potential residential development.

OPTION 30: HOUSING IN THE RURAL AREAS - If additional development is required should we

- 1) Limit development in the rural areas to that required to meet local needs or**
- 2) Direct proportionately more development to the rural areas over the plan period to meet wider district needs**

Both options offer a rather simplistic approach to a complex problem. All solutions will have a lasting impact on the rural landscape, infrastructure, viability and heritage. Option 1 could generate a “moth balling” character to a village community, while Option 2 could overwhelm and destroy existing character and heritage. On balance, we support option 1.

Both will require an unambiguous identification of needs, local and wider district, which are rigorously reviewed within a clearly defined monitoring programme.

Previous experience suggests that national perspectives are likely to exert a dominating influence.

OPTION 31: MEETING RURAL HOUSING DEVELOPMENT NEEDS – Should we:

- 1) Work with communities to allocate specific sites to meet identified housing needs or**
- 2) Provide a parish level figure to each area to allow flexibility for Neighbourhood Planning or other community led plans**
- 3) Use a combination of the above**

Developing a collaborative approach with local communities is more likely to achieve positive outcomes by enabling all parties to express their wishes and concerns within a constructive and reasoned dialogue – an essential element in our democratic process. A specific allocation of parish level figures would appear to identify an unequal partnership within the component partners.

OPTION 32: DEVELOPING A RURAL SETTLEMENT HIERARCHY - In developing a rural settlement hierarchy should we:

- 1) Give additional weight to the availability of certain services and facilities (which do you think are the most important?)**
- 2) Give additional weight to the accessibility of the settlement to our urban centres by public transport, walking and cycling?**

Please tell us if there are other factors that we should consider in developing a rural settlement hierarchy

The sustainability of any rural settlement requires facilities to support the day-to-day functioning, an understanding of its role within the broader community, together with an acknowledgement and awareness of its place within 21st century life.

Of particular importance would be:

Access to good quality education facilities, both primary, secondary and nursery

Access to primary medical care

Access to high speed and reliable internet connectivity

Local convenience shopping facilities, including a post office

Local recreational, community and entertainment facilities

Connectivity to major urban retail facilities

Connectivity to major employment locations

Safe and readily accessible highways infrastructure, with safe pedestrian provision

Provision of frequent, regular and affordable public transport
Availability of housing stock to sustain the provision of essential workers within the broader community.

The development of a rural settlement hierarchy will require the need to identify a range of measures to determine the relative features of individual villages. Such criteria should be clearly defined, unambiguous and open to public scrutiny. It is essential that the target outcomes are publicly identified and understood before such criteria are brought together for comparison. When comparison data is drawn from the available information, it must be considered against the previously identified target outcomes, rather than such target outcomes being subsequently “adjusted” to coincide with planning convenience.

It is essential to have precisely defined settlement boundaries for individual villages to provide greater certainty as to the extent of the built-up area, thereby addressing the current village boundary ambiguity. Should future pressures indicate a possible village boundary revision, this can be addressed through the identified democratic planning process.

Local perspective:

The Sibford Gower Parish Profile offers a concise and informative picture of our village, identifying a range of characteristics, detail and concerns which are particularly relevant to any future development consideration.

A recent Planning Appeal draws particular attention to the historically challenging nature of the local highway provision: “Given the spread of services across each settlement, it is unlikely that the development of any site around the Sibfords would readily enable access by sustainable transport modes”.

The already limited public transport provision has now (October 2021) been further reduced due to funding pressures. Recent information from Oxfordshire County Council affirms that, while the current service provider – Warwickshire County Council – is having to reduce its contribution, “Oxfordshire do not make any financial contribution towards the services”.

OPTION 33: THE RURAL ECONOMY – In support of the rural economy, including agriculture and tourism, should we

- 1) Apply criteria-based policies to assess development proposals**
- 2) Allocate specific sites in the rural areas to meet the needs of the rural economy**
- 3) Use a combination the above?**

Pragmatic reality is likely to determine that Option 3 offers the most appropriate means of supporting the current and future development of the rural economy.

Criteria based policies can offer clear direction and guidance as a baseline, while size and scale may indicate a more bespoke approach.

While the nature and priorities of the existing rural economy can be readily identified, these may be at variance with the nature and priorities for an innovative 21st century rural economy. Inevitably, this could lead to conflict where a climate of rational discussion and dialogue will be an essential component in determining future planned development.

The stated preference to favour the development of previously developed land and the conversion of existing buildings to limit the impact of new development on the countryside (para 6.6.13) is strongly supported.

OPTION 34: HISTORIC & NATURAL ENVIRONMENT – Should we:

- 1. Retain the current approach of seeking to conserve and enhance the countryside and landscape character of the whole district**
- 2. Define valued landscapes/landscape features in the district which would be the subject of additional policy guidance.**

While the two options identified are not mutually exclusive, the current approach would appear to generate a broader perspective which is beneficial to the wider community. Designated conservation areas already offer an added focus and protection to specifically designated locations within the broader perspective.

The suggestion of devising a non-statutory designation protection for “valued landscapes” offers a level of protection similar to non-designated assets within conservation areas and is to be welcomed.

The current draft plans of the County and District Councils both make reference to the overall quality of Oxfordshire’s landscape and to specific landscape and countryside features. Whilst some of these areas are afforded protection through measures such as ANOBs, others have almost identical characteristics, but do not have this recognition and the protection it brings. This is the case in the parish of Sibford Gower where the countryside immediately north of the village centre forms part of the Ironstone Downlands, a term promoted by the two councils. The topography is in the form of a long ridge which, at its highest point, reaches 210m in height. As such, it is similar in height to other nearby hills which include: Long Hill, Yarn Hill, Gallow Hill and Brailes Hill. These combine to form part of the distinctive landscape referred to as the Ironstone Downs (section 6.6 of the CDC Local Plan Review Paper).

Whilst the Ironstone Downlands have natural features of a similar character to those of the adjacent Cotswolds AONB, the area does not have the same protective status – a matter worthy of review. In addition to making a significant contribution to the quality of the Ironstone Downlands, the ridge to the north of Sibford Gower also makes a major contribution to the character of the entire North Cotswolds. The ridge in question provides extensive views west, terminated by the ridge on which Broadway Tower is located. In reverse, when viewed from Broadway Tower, the ridge to the north of Sibford Gower provides an equally imposing topographical feature, offering a strong green skyline. These two north-south ridge lines are important pieces of the wider landscape, combining to subtly contain and frame the northern area of the Cotswolds AONB. As such, there is a strong case that the Cotswolds AONB be extended eastwards to include the high ground immediately to the north of Sibford Gower.

The two inappropriate development sites proposed on land to the north of Sibford Gower are located on this important piece of landscape. Protecting this landscape through an extension of the Cotswolds AONB, or by defining it as a Special Landscape Area, would prevent this being considered.

As indicated in 6.6.18, current policies will need to be reviewed, with new ones being created, to effectively manage potential growth sensitively within the 21st century life experience.

QUESTION: NEIGHBOURHOOD PLANNING - How could we best support Neighbourhood Planning through the Local Plan in those communities that wish to prepare a plan?

There is some scepticism regarding the value of Neighbourhood Plans. Their construction formula is perceived as extremely time consuming and expensive, while their time limited implementational effectiveness is constrained, given that they are required to fit in to an established Local Plan which, in its turn, will have to meet national policy requirements.

Does the limited concept and understanding of Neighbourhood really generate significant impact to justify the efforts, energies and expenditure required?

While the suggestion (para 6.7.3) referring to allocating sites and developing local design codes offers an interesting option, it also identifies significant resource implications for both the local community and the local planning authority.

QUESTION: DEVELOPMENT MANAGEMENT POLICIES – Are there other areas where a local development management policy would be helpful?

The national pressure for generating renewable energy and reducing energy consumption will be important areas for the successful planning and implementation of future growth in the 21st century.

There is much talk, both locally and nationally, about affordable housing, although little common understanding of the term and the implementation policies. A precise understanding of the term “affordable housing” and clear implementation guidance would help to clarify this contentious area within the local planning authority.

With the likelihood of more people choosing to live in rural areas, consideration should be given to policies dealing with light and sound pollution; protection of the rural landscape; support for the farming community.

With recent challenging weather conditions likely to become a significant element in our future weather patterns, flood and water management cannot be ignored.

THANK YOU FOR TAKING THE TIME TO RESPOND TO THIS CONSULTATION. PLEASE RETURN THIS FORM BY 11.59PM ON 10 NOVEMBER 2021 BY EMAIL TO: PlanningPolicyConsultation@cherwell-dc.gov.uk

ALTERNATIVELY, PLEASE SEND BY POST TO:

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