

GUIDANCE IN RESPONDING TO CHERWELL DISTRICT COUNCIL'S PROPOSED SUBMISSION PLAN



This guidance document has been put together by the Begbroke and Yarnton Green Belt Campaign ('BYG') to help residents of Begbroke and Yarnton to respond to Cherwell District Council ('Cherwell DC') consultation on plans to build 4,400 new houses.

The document has been split into different sections to try and make it easy to navigate. The information included covers how to respond and provides information on different aspects of the plans. We recommend using the **template on page 3** of this document for your reply to the Cherwell District Council. If you chose not to use this template letter, it is essential to include the following wording:

"I consider that the proposed submission plan is Unsound, Not Positively Prepared, Not Justified and Not Effective for the reasons given in my specific objections below."

There is not much time left. If you haven't done so already, please submit your response by the **deadline of 5.00 pm on Tuesday, 10 October 2017.**

If you have response already but you have further comments you would like to send to CDC, **you can submit multiple responses** so it is still not too late.

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A. HOW TO USE THIS GUIDANCE DOCUMENT

Purpose of the Consultation

This consultation is the next stage of the process to examine the proposals from Cherwell DC to build 4,400 new houses. The response we make at this time will be reviewed by Cherwell DC and will also form part of the review that will be made by the Planning Inspector during the next stage of this process.

This consultation is looking at two main points:

1. Is the plan legally compliant and
2. The “soundness” of the plan – in lay speak, does it make sense?

It is likely that most responses will focus on the “soundness” of the plan. To you and I that means “do the plans make sense?” Is the plan effective? Is it justified? Is it consistent with national policy? Is it meeting development and infrastructure requirements?

We think that the plans fail on all of the above and have outlined some reasons why in this guidance document. We have split this into different sections to help guide you to the areas that are of specific interest.

We have also asked some questions that may help you to submit a personalised response. Response to as many of the points as you wish – you do not need to cover them all but rather focus on the ones that are important to you and allow you to highlight to Cherwell DC and the Planning Inspector why you do not agree with the plans.

While it is clear the plans are flawed, it is important to remember that in our responses we need to provide reasons why we think the plans are flawed.

If you think there are areas where the plan is not legally compliant, include this information also. (eg Did you respond to the first consultation process in late 2016? If yes, have Cherwell DC included your full response in the published information view representations).

Structuring Your Response

Responses can be made in one of two ways:

- The Cherwell DC form (<http://www.cherwell.gov.uk/index.cfm?articleid=9367>)
- In writing, either by email or letter

You do not have to use Cherwell’s complicated form for making objections.

If you want to email or write a letter to Cherwell DC, below is an outline structure and some wording that you could use as part of your response.

It is vital that you include your contact information – anonymous or confidential comments cannot be accepted. Cherwell DC have stated that only your name and comments will be made publically available.

Also state if you wish to participate in the independent examination by the planning inspector. If you do not want to appear in person, we suggest including wording that ask that your views at this stage will be presented by BYG – the more residents we are able to represent when meeting the planning inspector, the more weight our view will carry.

DRAFT RESPONSE LETTER / EMAIL TEMPLATE

[Insert your address]

[Date]

Planning Policy Consultation
Planning Policy Team
Strategic Planning and the Economy
Cherwell District Council
Bodicote House
Bodicote
Banbury, OX15 4AA

Representations on the Partial Review of the Cherwell Local Plan (Proposed Submission Documents)

From: [Insert Your Title, Name, Address & postcode (essential for your objection to be considered)]

I consider that the proposed submission plan is Unsound, Not Positively Prepared, Not Justified and Not effective for the reasons given in my specific objections below.

[Include information related to the Selected Sites, Green Belt, Transport, Flooding, wildlife from the detail provided below or of your own.]

I would like the Begbroke and Yarnton Green Belt Campaign to act as my representative during the Examination by the Planning Inspector.

Yours faithfully,

When and Where to Send Your Response

Submit your response by 5pm on Tuesday, 10 October 2017

Email: planningpolicyconsultation@cherwell-dc.gov.uk

Post: Planning Policy Consultation
Planning Policy Team
Strategic Planning and the Economy
Cherwell District Council
Bodicote House
Bodicote
Banbury, OX15 4AA

B. BEGBROKE & YARNTON SITES

This section discusses information about the proposed sites for the new houses and the impact these plans will have. Consider including some or all of these areas in your response.

Impact on Begbroke & Yarnton

Increase in population

Yarnton is a village with a population of approximately 2,550 and Begbroke is a village with a population of approximately 780 based on the 2011 Census. There are approximately 1,350 houses in Yarnton and 390 houses in Begbroke. The proposals from CDC will be to build 2,480 new houses on the Green Belt land that currently separates our two villages.

RESPONSE: DO YOU think that this development is appropriate, especially given its size compared to the current size of Yarnton and Begbroke villages?

Merging of villages

The proposed development is entirely on green belt land and would result in there being only a narrow gap separating the villages of Yarnton and Begbroke. This new development crosses the parish boundaries and we estimate that the physical gap between Begbroke and Yarnton will only be approximately 50 metres. There is also only a small gap between this enlarged development and Kidlington, meaning in effect that the three villages are merged into one large conurbation. We estimate the population would be around 30,000.

RESPONSE: DO YOU think it is right that the villages of Yarnton and Begbroke are merged together with Kidlington to form a single large conurbation?

Housing density

The housing density of the new developments will be 45 houses per hectare on the main site to the east of the A44. This is 50% higher than the density of the Cresswell Close/Pixey Close/Hay Day Close development in Yarnton a few years ago. Indeed, Cherwell stated when given planning permission that the number of houses on that site must be restricted to prevent over development. Why has their policy changed now?

RESPONSE: What is your view on the density of the proposed housing development? Is it consistent with the existing community or would this so called 'landmark development' jar with the historic villages of Begbroke and Yarnton?

C. GREEN BELT

National Planning Policy

We should also consider how the plans fit with the purposes of the Green Belt as defined in the National Planning Policy Framework (NPPF). There are five points in the NPPF and we have highlighted in bold some details on how these relate to the proposals from Cherwell DC:

1. To check the unrestricted sprawl of large built-up areas
Relevance to us: Preventing Oxford City from expanding beyond its current boundaries and becoming a urban sprawl
2. To prevent neighbouring towns merging into one another
Relevance to us: The villages of Begbroke and Yarnton would be merged together and also with the village of Kidlington
3. To assist in safeguarding the countryside from encroachment
Relevance to us: The sites proposed are part of the countryside that currently surrounds our two villages and are high grade agricultural land that is also used for recreational purposes
4. To preserve the setting and special character of historic towns
Relevance to us: Yarnton and Begbroke have long histories and the proposals threaten their identities and so the history
5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land
Relevance to us: There are other sites within Cherwell and the neighbouring districts, including Oxford City, that could accommodate these new houses without needing to remove precious land from the Green Belt. Once Green Belt land is removed, it is lost forever

RESPONSE: Why not provide a comment on some of the above points in your responses. It is clear these plans contravene the purposes of the Green Belt.

Cherwell District Council Planning Policy

A question you may have asked is that Cherwell DC must have their own policy on the Green Belt development? They do, it is included in Cherwell's Local Plan, approved in 2015. The policy is below and has been extracted from The Cherwell Local Plan 2011-2031, Part 1 adopted 20 July 2015:

Policy ESD 14: Oxford Green Belt

- The Oxford Green Belt boundaries within Cherwell District will be maintained in order to:
 - Preserve the special character and landscape setting of Oxford
- Check the growth of Oxford and prevent ribbon development and urban sprawl
- Prevent the coalescence of settlements
- Assist in safeguarding the countryside from encroachment
- Assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

“Development proposals within the Green Belt will be assessed in accordance with government guidance contained in the NPPF and NPPG. Development within the Green Belt will only be permitted if it maintains the Green Belt’s openness and does not conflict with the purposes of the Green Belt or harm its visual amenities. Proposals for residential development will also be assessed against Policies Villages 1 and Villages 3.

A small scale local review of the Green Belt boundary in the vicinity of Langford Lane, Kidlington and Begbroke Science Park will be undertaken as part of the Local Plan Part 2, in order to accommodate

employment needs (see Policy Kidlington 1). Further small scale local review of the Green Belt boundary will only be undertaken where exceptional circumstances can be demonstrated.”

Other statements on the green belt included in the Cherwell Local Plan Pt I included:

A11: “Development in the open countryside will be strictly controlled. In the south of the District, the Green Belt will be maintained, though a small scale local review of the Green Belt will be conducted to accommodate identified employment needs at Kidlington.”

B.260: “It is essential that the impact on the Green Belt is minimised, therefore priority will be given to locations that lie adjacent to existing development, avoid the coalescence of settlements, protect the vulnerable Kidlington Gap and otherwise have the least impact possible on the Green Belt.”

Yarnton and Begbroke are covered by “Policy Villages 1” that is reference above. This means only certain types of development can happen in such villages and is limited to the following:

- Minor development
- Infilling
- Conversions

RESPONSE: It is breath-taking reading the above when reviewing the proposals for 4,400 new houses on the green belt land around our villages. It is clear these proposals from Cherwell contravene their own Local Plan policy on the Green Belt. We suggest including comments on this point in your response.

Policy ESD 14 also includes the five points on the purpose of the **Green Belt** as described in the **National Planning Policy Framework**. By the way, **ESD** stands for ‘**Ecological Sustainable Development**’...

“Exceptional Circumstances”

This is a very important point. Land can only be removed from the Green Belt if exceptional circumstances can be demonstrated. We think that none of the following twelve points constitute the ‘exceptional circumstances’ needed to remove our green fields from the Oxford Green Belt. We are meant to be meeting Oxford’s unmet housing need with these 4,400 new houses. Many of the following points have no connection to this, such as the strengthening of Kidlington village. Others are spurious.

When reviewing the twelve points, consider that these houses are to meet the ‘unmet housing need of Oxford’. If this is correct, it is important to look at where the jobs are within Oxford. It is clearly stated within Cherwell’s documents that the three major employment areas are focussed on the City Centre, Cowley to the South and Headington to the East. Cowley and Headington combined employ more people than the City Centre. It is also noteworthy that jobs are migrating AWAY from the City Centre to the eastern and southern fringes of the Oxford urban area.

Cherwell DC's twelve "exceptional circumstances" as listed in their Proposed Submission Plan:

1. The urgent and pressing need to provide homes for Oxford including the exceptionally high need for affordable homes;
2. The clear inability for Oxford City Council to fully meet its own needs;
3. That the consideration of all other reasonable options did not suggest that a sustainable, deliverable alternative could be delivered without unacceptable harm to the existing Cherwell development strategy;
4. The immediate relationship of the north Oxford and south-east Kidlington area to the existing built-up area of Oxford, the allocated strategic development area of Northern Gateway and the new Oxford Parkway railway station / park and ride interchange;
5. The clear economic and social relationships that exist between Oxford and Cherwell's local communities at Begbroke, Yarnton, Kidlington and at Gosford and Water Eaton, and the clear potential to develop these relationships;
6. The significance of the north Oxford - A44 Oxford to Woodstock corridor to the economic forecasting work which informed the countywide assessment of housing need including the Oxford's Northern Gateway site, the University of Oxford's Begbroke Science Park, London-Oxford Airport and the Langford Lane area of Kidlington;
7. The unique place shaping potential for the area of land next to the University of Oxford's Begbroke Science Park; land situated next to Yarnton and Begbroke village and close to Kidlington. The Begbroke Science Park is a facility of international significance and is of great importance to the local and Oxfordshire economy. Its location close to Oxford and Kidlington and next to the Oxford Canal and railway provide for an exceptional opportunity to meet Oxford needs in parallel with the expansion of the Science Park;
8. The need to ensure a cautious approach at Woodstock (in terms of the number of new homes) due to the presence of international and national heritage assets while responding to the proximity and connectivity of a growing town to both Oxford and the growth areas on the A44 corridor;
9. The improvement of transport infrastructure in the north Oxford /A44 corridor area;
10. The strengthening of Kidlington village centre related to sustainable transport improvements including access to employment areas and the appearance of the built environment/public realm;
11. The opportunity to provide improvements to the quantity and quality of new public open space and green infrastructure and in terms of access to the countryside; and, the provision of additional facilities that will benefit Kidlington/Gosford, Begbroke and Yarnton; and
12. The ability to create a sustainable, holistic, joined-up vision for the whole of the north Oxford /Kidlington/A44 corridor area.

As you will have seen, these arguments reverse the Cherwell DC's own stated policies on the protection of the Green Belt, as well as failing to conform with national guidelines.

RESPONSE: Based on the above, do you think Cherwell DC has provided the "exceptional circumstances" needed for removing our Green Belt land? If not why not?

Consider if it makes sense to locate Oxford's unmet housing needs to the north of the city when the major employment centres are in the east and south.

Consider also including your own views on some or all of the above in your own responses.

C. TRANSPORT

The proposals will have a major impact on transport with extra pressure being placed on already congested roads.

The plans for new transport infrastructure deal with the existing needs and do not model the impact of the additional 4,400 houses. These plans will also cost millions of pounds and are currently unfunded. The Rapid Transit system (remember these are long buses, NOT TRAMS) will not pass through either Begbroke or Yarnton but will instead go from the new proposed Park & Ride site at Bladon roundabout to Kidlington along Langford Lane. Traffic that normally passes through Kidlington will be encouraged to use the A44. This means our villages will not be served by the Rapid Transit system and will suffer increased traffic, and that is before considering the new houses.

RESPONSE: Consider how an additional 4,400 houses in the area will affect your daily routine, particularly your commute to and from work.

RESPONSE: Do you use public transport or drive? How long does your journey currently take? Do you suffer delays and if so, how often?

RESPONSE: Are you a cyclist? Would you want to cycle into Oxford via Kidlington?

Highlighting any existing issues will help reinforce that increasing the pressure on the transport network will only result in more delays and longer journey times.

The transport plans indicate that Sandy Lane will be closed to through traffic at the level crossing. Sandy Lane, by the admission of Oxfordshire County Council and Cherwell District Council, is a well-used road. We also know that it provides a valuable link between our two villages and Kidlington. There is no public transport option planned to link these villages together with the only option being to travel further by car (which is already being discouraged) or walking or cycling. This is not an option for many people.

RESPONSE: How will the closure of Sandy Lane affect your life? How regularly do you use this road? Have you ever been held up in a traffic jam (Cherwell described this road to us as a “pinch point”)?

D. FLOODING

We all know flooding in the area is an issue. We have pictures showing the impact to flooding on Yarnton and Begbroke village. If the fields are concreted over, where will the rain water that falls be absorbed? The areas on the edge of the site form part of the flood areas for the Oxford Canal and Rowell Brook.

RESPONSE: Are you able to include your experiences and concerns about the risk of increased flooding on both villages. We believe that removing important Green Belt land will only exacerbate the risk and misery that flooding brings to families.

E. WILDLIFE

The countryside that surrounds our two villages is rich in wildlife. The loss of this habitat for housing will have a massive environmental effect. We have heard of some residents with bat colonies living near to them and that these could be threatened by these plans.

RESPONSE: Can you include any information about wildlife in the area that you think could be effected by these houses?

F. PROPOSE CHANGES TO THE PLANS

The response questions include one asking for us to set out what change(s) we would consider necessary to make the Local Plan legally compliant or sound.

Given that it's unlikely many people responding will be planning professionals, and that we have only six weeks to review the information and respond, this question seems rather unfair. Particularly when you consider that Cherwell have been working on this for at least 18 months and have engaged with numerous third party advisers (paid for by us no doubt).

We have a few suggestions that you could consider including on how the plan could be amended (including the suggestion that the proposals are 'put in the bin' was tempting but we have tried to be a bit more constructive!).

- Cherwell DC consider other sites. Bicester is one example of a place that is easy reach of Oxford by train.
- Oxford City Council use its own brownfield sites. Oxford could prioritise solving its own housing problems by using sites like the Northern Gateway or its own golf courses.
- Oxford City Council could consider building taller buildings.
- Oxford City Council could consider using sites, including green belt ones, which are located closer to the major employment areas: the City Centre, Headington and Cowley (recall these last two areas employ more people than the City Centre does). Any sites on Green Belt land would need to avoid undue urban sprawl or merging villages together – two points that the Cherwell proposals fail on.
- Reviewing the housing forecasts. These are based on the 2014 Strategic Housing Market Assessment or SHMA and are overstated. The forecasts used historical data and was undertaken before the European Union referendum happened.

QUESTIONS?

It's quite a complicated process with lots of terms and jargon. We know time is short but hopefully these notes help. Do get in touch if you have any questions, we are here to help.

Contact us by email at info@ourgreenbelt.uk or via our Facebook page, www.facebook.com/bygbc.

It's our Green Belt, together we can save it!