



**Cherwell**  
DISTRICT COUNCIL  
NORTH OXFORDSHIRE

39 Castle Quay  
Banbury  
Oxfordshire  
OX16 5FD

[www.cherwell.gov.uk](http://www.cherwell.gov.uk)

Please ask for: [REDACTED]

[REDACTED]  
Our Ref:

12 September 2025

Dear [REDACTED]

## **Modified Bloxham Community Neighbourhood Plan 2025 – 2040**

### **Pre-Submission Version: July 2025**

Thank you for consulting the District Council on your pre-submission Modified Neighbourhood Plan. The Council supports collaborative working with Bloxham Parish Council to facilitate the progression of the Modified Neighbourhood Plan. The progress being made by the Parish Council is welcomed.

As Local Planning Authority, the District Council has a duty to advise or assist a Parish Council in preparing a plan and is expected to be proactive in providing information to communities about neighbourhood planning. The following Officer comments should therefore be considered in that context and are intended to be constructive to assist your future decision-making process. They are made without prejudice to those that the Council may wish to provide upon the submission of the Plan (Regulation 16).

### **National Policies and Advice**

The reference to the NPPF is welcome. It would be helpful to include the date of the latest NPPF that has been used in the preparation of the Modified NDP. However, it should also be noted that the Cherwell Local Plan Review 2042 is being examined under the December 2023 version of the National Planning Policy Framework. This is explained in more detail below in the comments on Policy BL1.

### **General Conformity with the Local Plan**

The Cherwell Draft Local Plan Review 2042 was submitted to the Secretary of State for examination on 31 July 2025. You may wish to update the text accordingly.



The Modified NDP states that regard has been had to a number of policies in the adopted Local Plan as well as the new Local Plan which is welcomed. However, it is noted that the plan period of the Modified NDP does not align with that of the Cherwell Local Plan Review which looks ahead to 2042. We suggest that the Parish Council should consider revising the end date of the NDP to accord with the emerging local plan.

It is not considered that this will impact on the current proposals in the Local Plan as it significantly exceeds the housing requirement set out in the draft Cherwell Local Plan Review. This matter is considered in more detail below.

## Detailed comments

### Section 3 Vision and Objectives

We suggest that that the Vision includes the revised end date of the plan rather than a reference to the next few years.

### Policy BL1: Spatial Plan for Bloxham

This includes a clear approach to where development will be considered acceptable in the village, although it may be helpful to include additional text along the lines of “subject to meeting the requirements of other relevant policies” to ensure a robust approach.

It is noted that the settlement boundary does not at this stage include housing schemes that have been approved or allocated but have not yet been built out. It is the intention to include these in future versions of the plan when they are built out. However, these sites are included on the policies map which is helpful.

It may be necessary to consider a slight rewording of policy BL1 to ensure that the two parts of the policy do not conflict. You may also want to consider splitting into 2 policies with the site allocations separate. For example:

- A. The Neighbourhood Plan defines a Bloxham Settlement Boundary, as shown on the Policies Map. Proposals for development within a Settlement Boundary will be supported in principle. Development proposals will not be supported outside a Settlement Boundary unless its use and scale are specifically suited to, or require, a countryside location or they are included in B below:**
- B. The Neighbourhood Plan provides for approx. 285 homes to be delivered in the plan period 2024 – 2037 comprising land at:**
  - i. North of Ells Lane (30 homes - consented)**
  - ii. South of Hartshill Close (130 homes - consented)**
  - iii. East of Tadmarton Road (125 homes - allocated)**
- C. Additional homes may be delivered through windfall schemes on suitable sites within the Settlement Boundary.**

The supporting text to policy BL1 explains that *“the Parish Council has used the New Standard Method as a starting point for deriving an indicative housing figure for this policy which presently equates to 21.8 homes per year. It considers this a firm basis for planning for housing growth for the next decade or more, which will lead to a 20% increase in the number of homes in the village to 1,700. This scale of growth can be accommodated if the capacity of local infrastructure can be improved.”*

It should be noted that the Cherwell Local Plan Review 2042 was submitted to the Secretary of State under the transitional arrangements set out in paragraph 234(a) of the revised NPPF. This is because the housing requirement in the Local Plan meets at least 80% of local housing need. Consequently, this means the Cherwell Local Plan Review 2042 will be examined under the December 2023 version of the National Planning Policy Framework.

As stated in the Modified NDP Policy RUR 1 of the Cherwell Local Plan Review 2042 provides a housing growth figure of 75 dwellings to Bloxham. This figure was based on a number of factors and is considered an appropriate level of housing for Bloxham up to 2042. Therefore, the proposals to provide for approximately 285 homes between 2024 and 2037 significantly exceeds the figure set out in the emerging local plan which looks ahead to 2042. It should be noted that in relation to the standard method the 2023 and 2024 versions of the NPPF requires the local planning authority to provide the standard method apportionment to parish councils. Cherwell District Council has not provided a figure based on the new standard method to Bloxham Parish Council.

The Parish Council’s desire to plan positively by setting an increased housing target to counter speculative development proposals is understood and welcomed but given that this is such a significant increase, the Parish Council may wish to consider phasing the delivery of the new site to later in the plan period.

## **Policy BL.2: Land East of Tadmarton Road (‘Painters Farm’)**

This site includes land that was assessed as part of the 2024 Housing and Economic Land Availability Assessment (HELAA) Report May 2025. These documents form part of the evidence base for the examination of the Cherwell Local Plan Review 2024. The conclusion of that assessment was that overall, the site is not suitable for development. However, the reasons for this included that it was not an NDP site and its development might prevent the potential expansion of the primary school. Both these issues are addressed by the modification to the NDP.

However, the HELAA assessment also raised concerns about this not resulting in a cohesive village extension and would protrude the built edge northwards into the open countryside.

It is noted that the Parish Council has undertaken a rigorous assessment of a number of sites around the village edge and that this site offered locational advantages over others together with the willingness of the land promoter to agree to a scheme which would deliver community benefits. Plan 1 provides an illustrative concept plan for the site. If the Parish Council continues with the allocation as included, notwithstanding the comments above about the housing requirement, the Parish Council may wish to consider referencing the concept plan in the policy / or including some of the written text on plan 1 in the supporting text to ensure that the mitigation measures are delivered.

### **Policies BL3: Connectivity and BL4: Parking**

Colleagues at Oxfordshire County Council will comment on these. However, it is suggested that Policy BL4 could include reference to cycle parking.

### **Policy BL.5 Housing Mix**

It is noted that this policy is informed by a recent housing needs study carried out by AECOM. However, it is not in line with the approach taken in the emerging Local plan by combining all housing into one category. Therefore, the Parish Council may wish to consider separating out into affordable and market housing.

The supporting text stipulates how any viability issues should be considered in that only abnormal development costs should be taken into account and not land value. This approach is at odds with the District Council's approach to viability assessment carried for the local plan.

### **Policy BL.6: Adapting Homes to meet Demographic Change**

This policy includes a requirement where practical for developments of new homes to comprise at least about 20% of the new dwellings as bungalows.

This updates the existing NDP policy to make a specific requirement for bungalows. We understand the reasoning behind this policy. However, the Parish Council may wish to reconsider the wording of this to specify a threshold of the number of dwellings proposed for this requirement to be engaged. We would also question whether consideration has been given to the viability of this requirement give the increased land take of bungalows.

### **Policy BL7: Residential Amenity**

No comments

### **Policy BL8: Local Infrastructure**

This policy identifies specific infrastructure requirements of the village. The Parish Council may like to consider adding an additional general requirement as follows:

**All new development will be required to provide for the necessary on-site and, where appropriate, off-site infrastructure requirements arising from development proposals. In particular:**

- A. Development proposals etc***
- B. Proposals for major housing etc***

### **Policy BL9 General Design Guidance**

No comments

### **Policy BL10: Design in the Conservation Area**

A minor rewording is suggested for clarity:

~~In addition to the General Design Guidance of Policy BL9, The appearance, landscaping, layout, scale and design of development proposals in the Bloxham Conservation Area, as shown on the Policies Map, and which affects its setting, must conserve and enhance the heritage significance of the Conservation Area as defined in the adopted Conservation Area Appraisal.~~

### **Policy BL11: Key Streetscenes & Views**

No comments

### **Policy BL12: Employment Land**

No comments

### **Policy BL13 Village Centre**

The Parish Council may wish to consider the following suggested rewording:

~~A. Within the Bloxham Village Centre as shown on the Policies Map the following development proposals will be supported, provided that they accord with national and local policies to protect heritage assets and their setting, and with the relevant design guidance.~~

~~B. new retail units or the expansion of existing retail units in the Village Centre and on Church Street will be supported provided that~~

a) they accord with national and local policies to protect heritage assets and their setting, and with the relevant design guidance and:

b) the impact of any additional traffic generated has been satisfactorily mitigated and will not adversely affect the highway network and pedestrian safety.

### **Policy BL14**

No comments.

### **Policy BL15**

No comments.

Thank you again for consulting us. I hope you find these comments helpful. We would encourage further engagement with us on these comments and those of others, before you finalise your Regulation 16 Neighbourhood Plan.

Yours sincerely



Planning Policy, Conservation & Design Manager

## **Bloxham Neighbourhood Plan Consultation**

### **CDC Heritage Comments**

**12 September 2025.**

#### **Policy BL10: Design in the Conservation Area**

- 1. The policy should refer to all designated and non-designated heritage assets in Bloxham, as opposed to exclusively referring to the Conservation Area.**
- 2. Policy BL10 title should encompass all designated and non-designated heritage assets in Bloxham i.e. Policy BL10: Development proposals affecting heritage assets**
- 3. The wording of Policy BL10 could be amended as suggested below:**

*The siting, scale, massing, detailing, design, materials and landscaping, of development proposals affecting heritage assets or their setting must conserve or enhance the heritage asset in a manner appropriate to its significance.*

*This policy should be read in conjunction with the adopted Bloxham Conservation Area Character Appraisal, 2025.*

#### **Policy BL11: Key Streetscenes and views**

- 1. Bloxham Conservation Area Appraisal includes detailed townscape analysis for each character area. It might be helpful to include/ refer to these additional views etc. in the Neighbourhood Plan.**
- 2. The church spire provides a useful navigation tool which extends into adjacent parishes and is often a focal point in views heading to Bloxham from Tadmarton for instance.**
- 3. Historic England's GPA3 'Setting of Heritage Assets' is the key guidance document for views assessments.**

#### **Policy BL9: General Design Guidance**

- 1. Viii solely mentions non designated historic assets- should it also include designated heritage assets?**



## OXFORDSHIRE COUNTY COUNCIL'S RESPONSE TO THE FOLLOWING CONSULTATION:

**District:** Cherwell

**Consultation:** Bloxham Neighbourhood Plan Pre-Submission Document 2025-2040

---

**Annexes to the report contain officer advice.**

---

### Overall View of Oxfordshire County Council

Oxfordshire County Council encourages and supports the aspiration of parishes to develop and implement Neighbourhood Development Plans. We welcome the opportunity to comment on the Pre-Submission version of the revised Bloxham Neighbourhood Plan. We note that the plan takes into account Cherwell District Council's emerging Local Plan 2042, which has recently been submitted for examination.

#### Highways:

There are several proposed new Local Greenspace allocations. Several of these allocations appear to include Highway Land. Where land has highway status, this takes legal precedence over the rights of the sub-soil owner and no works can take place without the County Council's approval. The highway status of the land means that the public have the right to pass and re-pass over it and public utilities have the right to site equipment on or within it. It is unclear how any green space status could affect this, or the County Council's ability to carry out any highway works or improvements in the future and we would not want to fetter this ability in any way. We therefore request that any Greenspace allocations that contain Highways Land are de-allocated- this includes verges.

#### Historic Environment / Heritage:

We welcome mention of the numerous historic features of Bloxham. We recommend that the NP has a Heritage Policy in its own right; officer comments below contain suggested wording for such a policy.

#### Climate Change and Biodiversity:

We greatly welcome the inclusion of a policy on Climate Change. We would recommend a specific policy on biodiversity which could make reference to the draft Local Nature Recovery Strategy and OCC's verge management policy.

**Innovation:**

The Innovation team has multiple suggestions for how to improve and future proof the connectivity of Bloxham.

**Education**

OCC welcome the safeguarding of the school expansion land as part of Policy BL2: Land East of Tadmarton Road ('Painters Farm'). It should be recognised however, that the expansion land may not be required unless there are higher levels of housing/population growth. The need and timings for any potential future school expansion will be assessed at the time of the planning application.

**Officer's Name:** [REDACTED]

**Officer's Title:** Strategic Planner

**Date:** 29 August 2025

---

**ANNEX 1**  
**OFFICER ADVICE**

**District:** Cherwell

**Consultation:** Bloxham Neighbourhood Plan Pre-Submission Document 2025-2040

**Team:** Strategic Planning

**Officer's Title:** Assistant Strategic Planner

**Date:** 29/08/2025

---

### Policy BL1: Spatial Plan for Bloxham

OCC is aware that as well as the 285 homes set out in the neighbourhood plan there is additional development in Bloxham in the pipeline:

The Neighbourhood Plan provides for approx. 285 homes to be delivered in the plan period 2024-2037 comprising land at:

- i. North of Ells Lane (30 homes- consented)
- ii. South of Hartshill Close (130 homes- consented)
- iii. East of Tadmarton Road (125 homes- allocated)

In addition:

- Application 24/02541/OUT Harthill Close- has an approval subject to S106 for 150 dwellings (20 above what was anticipated)
- 23/01265/OUT & 24/01908/OUT duplicated applications at Tadmarton Road have this week both been consented at appeal (55 dwellings)
- 25/01009/OUT land east of Barford Road Bloxham (120 dwellings) is awaiting determination

This could amount to a further 195 dwellings.

### Policy BL2: Land East of Tadmarton Road ('Painters Farm'):

Development of the eastern area of the East of Tadmarton Road allocation will need careful consideration to avoid overshadowing or overlooking of the primary school. Safeguarding of land for the potential future expansion of the site is welcomed. Clarity is sought on the route of the proposed overhead cable realignment.

The location of the allocation site at the base of Hobb Hill raises concern with regard to surface water flooding and any development would need to be planned in consultation with the Lead Local Flood Authority (LLFA) to ensure that the development is designed with this in mind.

The proposed site has the potential to result in visual and landscape impacts from siting a housing development on the side a prominent hill within the area. It is disappointing that this does not seem to have been given significant consideration in the Site Assessment. The Strategic Planning Team recommend that any development on the site would need to include a landscape and visual impact assessment.

### BL11: Key Streetscenes and Views

The Policies Map and Appendix B should include further information to enable a development to appropriately protect and conserve the key views, for example vision splays to make it possible to understand the specific views trying to be protected. Consideration should be given to the interaction between the key view at Hobb Hill and the allocated site in BL2 and this should be considered in the policies.

**District:** Cherwell

**Consultation:** Bloxham Neighbourhood Plan Pre-Submission Document 2025-2040

**Team:** Transport Policy and Strategy

**Officer's Title:** Senior Transport Planner

**Date:** 31 August 2025

---

### General Comments

The Plan period covers up to 2040, however we are aware that the Local Plan covers the period up to 2042. To ensure better consistency, would it not be appropriate to extend the plan period to 2042?

We would also like for the Neighbourhood Plan to make reference to the Movement and Place Plans (MAP Plans) being developed as part of the [Local Transport and Connectivity Plan](#) (LTCP). This is a statutory document, and referencing this plan will ensure that the Neighbourhood Plan is broadly aligned with local transport policies. In this case, the relevant MAP Plan is likely to be Banbury or the Cherwell Towns and Larger Villages Plan. We would recommend amendments to the supporting text to Policy BL1 to ensure this is incorporated.

### Vision

The wording of the vision could be slightly added to, to reflect the aspirations within the plan of achieving sustainable connectivity through walking, **wheeling** and cycling. For example:

*“and new community facilities, ~~and~~ public open spaces, **and healthier streets.**”*

**Reason:** To better align the Neighbourhood Plan with the priorities of the LTCP.

### Policy BL2: Land East of Tadmarton Road ('Painters Farm')

The County Council has [adopted design standards](#) for walking and cycling as part of new development and on existing highways. Whilst this guidance is being revised, the existing guidance is still useful for identifying how best to provide high quality walking and cycling links as part of new development.

The wording of the policy at present is useful. However, we would recommend additional detail in supporting text to point developers and site promoters in the direction of best practice. This text could be **“The development of pedestrian, wheeling, and cycling infrastructure to connect the development to Bloxham should be completed to the highest design standards. Guidance on how to achieve this can be found in adopted Oxfordshire Walking and Cycling Design Guidance, Manual for Streets and Local Transport Note 1/20 (among others).”**

**Reason:** To ensure that policies relating to street design reflect established best practice more closely.

### Policy BL3: Connectivity

The policy is positive in its direction and intent. With some further improvements, we consider that this policy could lead to significant improvements for sustainable transport access in Bloxham.

Improving connectivity by public transport, walking, **wheeling** and cycling is a key part of the LTCP plans to reduce vehicle kilometres across Oxfordshire by 20% over

the lifetime of the LTCP. It is therefore imperative that links are established in the Neighbourhood Plan with the LCTP and associated modal strategies and Movement and Place Plans, to establish a clear link between the delivery of the Neighbourhood Plan and such wider transport strategies.

Specifically, within the supporting text of this Neighbourhood Plan, we would welcome references to development needing to support the implementation of Local Cycling and Walking Infrastructure Plans (LCWIPs), the Bus Strategy and Bus Service Improvement Plan, the Mobility Hub Strategy, the forthcoming Rail Strategy, the Movement and Place Plan for the area, and any subsequent or associated strategies.

With regards to buses, Bloxham is served by an hourly bus service linking the village to Banbury and Chipping Norton, providing a key transport link for those unable to drive or who choose not to. Developments that support the continued viability of this service should be supported in the Neighbourhood Plan.

We would also recommend that this policy strengthens the link between with the LCWIP covering the area – namely the Banbury LCWIP. With this focusing on the provision of Village Route 7, that seeks to connect Bloxham and Bodicote.

**Reason:** To better link the Neighbourhood Plan with established and emerging transport strategies and policies, making the Plan more sound.

#### **Policy BL4 – Parking**

The car parking provision outlined in this policy accords with established standards for new developments adopted by Oxfordshire County Council. We would recommend that, in the supporting text, the Neighbourhood Plan refers to adopted County Council [Guidance for Decide and Provide and Transport Statements](#), which highlights the need to take account of the accessibility of sites when determining potential transport impacts and parking.

It should be noted that a key part of the LTCP is to reduce the use of private cars throughout Oxfordshire, as part of wider policy objectives such as reducing carbon emissions. Reducing car use and ownership is a key opportunity area, as new residents and businesses are establishing new travel patterns as they move homes and premises. A method of encouraging this is to reduce the maximum amount of parking spaces provided as a part of new developments, discouraging car ownership. We would recommend that in the supporting text, reference is made to the overall goal in the LTCP to reduce the use of private car and, have parking provision as part of new development reflecting this goal.

We would also recommend that as part of car parking for new developments, passive provision is made for the installation of electric vehicle charging points (e.g. through installation of underground ducts for cabling). Ensuring that such facilities could be installed in the future. We would recommend that the policy wording be reflected to reference this.

**Reason:** To ensure that the Neighbourhood Plan aligns with the overall objectives and vision of the LTCP and encourages the use of sustainable and zero-carbon methods of transport.

**Policy BL9 – General Design Guidance;**

**Policy BL10 – Design in the Conservation Area; and**

**Policy BL11 – Key Streetscenes and Views**

We are encouraged to see that the quality of good urban design and the value that it adds is reflected in the Neighbourhood Plan. We highlight that the desire to improve the quality of the public realm is also a key element of our established design guidelines for walking and cycling, which are in the process of being reviewed.

We would recommend that changes be made to either the policy or supporting text, recommending that developers refer to County Council guidance on walking, cycling, and improving the quality of streets, and utilise such guidance to improve the overall quality of the public realm in Bloxham.

**Reason:** To ensure that the Neighbourhood Plan is aligned with best practice design guidance in relation to walking, cycling, and streets more generally, and that this is communicated to developers.

**Policy BL13 – Village Centre**

As the most accessible location in the village in terms of journey times by walking and cycling, we consider that the role of these modes in terms of mitigating the impacts of future development in the centre could be significant. Particularly in playing a role in achieving Part B of this policy. We agree that providing a safe and high-quality environment for pedestrians is essential for mitigating the impact of developments in the village centre.

We would also disagree with the comment that many of the developments are out of walking distance from the village centre. Much of the village is within 10 minutes' walk of the village centre, with even the outer-most extents of the village being no more than 30 minutes' walk. Distances and journey times that are very much walkable for the majority of people. Improvements to pedestrian infrastructure delivered through new developments would improve the walkability of the developments and the wider village.

We would recommend some further wording in the supporting text that highlights that any developments in the village centre should seek to improve the overall quality of the pedestrian environment as part of the development, in line with established highways design guidance. This can be through enhancing the existing or providing new streetscapes.

**District:** Cherwell

**Consultation:** Bloxham Neighbourhood Plan Pre-Submission Document 2025-2040

**Team:** Place Planning North

**Officer's Title:** Transport Planner

**Date:** 26/08/2025

---

Oxfordshire County Council supports BL3: Connectivity A and the need to promote and improve low-carbon connectivity which meets the Local Transport & Connectivity Plan objectives of putting walking and cycling at the top of the transport mode hierarchy.

The document mentions that Bloxham has a relatively large aging population, so any opportunity (through the development process) to create accessible pedestrian pathways, improve connectivity for walking routes, should be sought from development.

There could be the opportunity for collaborative work with the County Council's Place Planning team and colleagues in Public Health to consider promoting active travel for health benefits - which could target not just the ageing population but also families already residing or new to the area.

With any new development there will be generated traffic. This is mentioned within the pre-submission in regards to direct impact on Bloxham and also potential impact on Banbury's AQMA. While traffic generated from development in Bloxham may have only a minor impact it is important to monitor cumulative impacts, and this supports the need for low-carbon connectivity to Banbury as the nearest service centre for Bloxham. There is the existing shared path on the western side of the A361 and in addition the Banbury LCWIP promotes an off-road connection to Bodicote.

Page 20, Policy BL10: Design in the Conservation Area – this is a strong inclusion that rightly underscores the importance of Bloxham's Conservation Area. It could provide clarity in terms of preferred materials for schemes etc. to better inform expectations.

Page 31, Appendix A paragraph 6 – in reference to a Community Benefits List that was created by the Parish Council in 2023 - one of the six listed items that have been deemed deliverable was 'Traffic Management works along the High Street'. There have been discussions along these lines in the past and it would be good for officers to discuss the options with the parish council and local county councillor to establish a scheme or package of measures. No change required for this document.

Appendix A: Site Assessment & Selection – Site 1 – particularly important for this development proposal to link with the rural LCWIP scheme to Banbury via Bodicote.

**District:** Cherwell

**Consultation:** Bloxham Neighbourhood Plan Pre-Submission Document 2025-2040

**Team:** Transport Development Management

**Officer's Title:** Transport Development Lead

**Date:** 27/08/2025

---

### Policy BL 3 – Connectivity

There have been a number of housing development applications in Bloxham in recent years and Highways have requested S106 contributions. It is expected that OCC will request contributions towards Public Transport Services, Infrastructure, PROWs. In addition, OCC Highways are likely to require S278 works (or failing that contributions) from future developments towards LCWIP schemes to improve active travel connectivity for residents of proposed developments.

### Policy BL 4 Parking

**A** – No comment – aligns with County Standards.

**B** – The proposed parking provision significantly exceeds the standards set out in Oxfordshire County Council's Parking Standards for New Developments, offering more than double the recommended allocation. This level of provision reflects a predict-and-provide approach, which risks encouraging private vehicle use and undermines efforts to promote sustainable travel. The county standards and policies are proactive, rather than reactive, focusing on reducing vehicle trips and parking demand through improved sustainable transport connections. Furthermore, reliance on off-site parking to support the development may prove ineffective if the parking is not conveniently located and is unlikely to mitigate the on-street parking pressures.

**C** – This is consistent with guidance outlined within OCC's Street Design Guide.

**D** – Mitigation methods are available to determine whether a loss of parking is to be detrimental to the adjacent highway (Parking Surveys, Site visits). I have concerns over the way in which this point is written, there may be cases in which prohibiting development due to a reduction in vehicle parking would not be justifiable – for example where parking on site already exceeds that of the maximum standard set out within County parking standards.

### Site 1

Regarding Site 1, which proposes up to 125 homes, vehicular access is intended to be provided via a suitable point along Tadmarton Road at the western end of the site. Additionally, pedestrian provisions should be delivered along Tadmarton Road to ensure safe and easy movement between the site and the surrounding neighbourhood. It is also essential to explore other links, such as to the south of the site onto Courtington Lane and the eastern frontage onto the existing Public Right of Way (PRoW). The plan should include a requirement for a cycle route through the site to the eastern boundary, with a link to the PRoW.

### Site 5

For Site 5, which proposes up to 230 homes, the site straddles both the north and southern ends of Milton Road, with the northern parcel being the largest. Access is only possible from Milton Road, and there are limitations regarding the siting of access points. Despite this, the most viable option for access to the two parcels may be via a crossroads junction, considering the limited frontage along Milton Road. Of course, this will be subject to a thorough technical assessment.

Any parcel exceeding 150 dwellings will necessitate an emergency access in accordance with OCC's Street Design Guide. Due to the lack of frontage shared with the highway, OCC is concerned that this requirement shall present a constraint that shall be impossible to overcome.

Furthermore, the shape of the site means that most residential units will be located away from Milton Road, where access to public transport would be taken from. As a result, the site is likely to be poorly served by a bus service due to the distance. Therefore, walking and cycling facilities along Milton Road should be considered to facilitate journeys by active and sustainable means of travel. It should be a policy requirement for the site to improve pedestrian and cycle facilities along Milton Road.

**District:** Cherwell

**Consultation:** Bloxham Neighbourhood Plan Pre-Submission Document 2025-2040

**Team:** Highways Agreements

**Date:** 27/08/2025

---

Several of the Local Green Spaces identified in the Policies Map appear to be partly within the maintained highway (they are within highway land and the County Council is the relevant Highway Authority).

Where land has highways status, this takes legal precedence over the rights of the sub soil owner and no works can take place without the County Council's approval. The highway status of the land means that means that the public have the right to pass and re-pass over it and public utilities have the right to site equipment on or within it. It is unclear how any green space status could affect this, or the County Council's ability to carry out any highway works or improvements in the future and we would not want to fetter this ability in any way.

We therefore request any Greenspace allocations that contain Highways Land are removed from the Local Greenspaces Designations within this Neighbourhood Development Plan.

**District:** Cherwell

**Consultation:** Bloxham Neighbourhood Plan Pre-Submission Document 2025-2040

**Team:** Public Health

**Officer's Title:** Health Improvement Practitioner

**Date:** 27/08/2025

---

The following comments relate to the potential human health impacts and opportunities arising from the proposed Bloxham Community Neighbourhood Plan 2025-2040.

The rurality of Bloxham leads to a heavy reliance on the car, with 93% of residents having access to a car or van. While active travel provision is important, a more practical solution for residents to commute to workplaces outside of the village would be to encourage lift-sharing. This could be woven into an existing policy on transport and sustainability, or in a standalone policy.

### **Policy BL3: Connectivity**

Owing to the expanding nature of the housing stock in Bloxham, it will be important to include an objective and/or policy which promotes new and improved walking, wheeling and cycling infrastructure for the village – an issue that is raised in Policy BL13: Village Centre. Backed by the [20-minute Neighbourhood](#) principles, those living on the outskirts of the village should be able to access shops, schools and other central facilities via a safe journey which separates them from vehicular traffic wherever possible. This would also have the effect of reducing traffic congestion and encouraging modal shift. With this in mind, new homes should be built with active travel as the priority, with secure and covered cycle parking at the front of properties where practicable, and with space to walk, wheel and cycle away from trafficked roads.

### **Policy BL4: Parking**

Parts C and D of Policy BL4: Parking is welcomed, so to ensure that vehicular parking is kept away from pavements and walkways wherever possible, thereby providing a more comfortable environment for pedestrians, wheelchair users etc.

### **Policy BL5: Housing Mix and Policy BL6: Adapting Homes to meet Demographic Change**

The Plan's reference to the inclusion of 'much sought after bungalows for local downsizers' is supported, and the style of housing brought forward in future development sites should reflect the local demand, e.g. [lifetime homes](#) which cater to people throughout their lives and for a variety of accessibility needs, as well as smaller properties to enable first-time buyers to get onto the property ladder.

### **Policy BL9: General Design Guidance**

This policy is generally supported, although the climate mitigation that green infrastructure and landscaping can offer has been missed from point v. Particularly with hotter summers becoming more frequent, green infrastructure will become essential to provide people and buildings with shading from hot sunshine. This is [backed by the TCPA](#).

**Policy BL13: Village Centre**

This policy is supported in principle, but would be strengthened further by stating that new retail units which do not promote healthy food choices (such as hot food takeaways) would not be supported. Paragraph 97 in the [latest iteration of the NPPF](#) supports local authorities to refuse of fast-food outlets where certain vulnerable groups are exposed to them.

**Policy BL15: Local Green Spaces & Other Amenity Spaces**

This policy is welcomed as the benefits of access to green space are well-documented. Green space within the future housing developments will also be important, providing residents with space for growing food, sport and amenity, although we recognise that this may be outside of the scope of the Neighbourhood Development Plan to determine.

**District:** Cherwell

**Consultation:** Bloxham Neighbourhood Plan Pre-Submission Document 2025-2040

**Team:** Education

**Officer's Title:** Service Manager for Pupil Place Planning

**Date:** 29/07/25

---

Bloxham CE Primary School is a 2 form entry primary school, for which the standard site area required by the County Council for a new primary school would be 2.22ha. The school's actual site area is 2.04ha, below the County's standards for a new school but within the government's site area guidelines for an existing school.

Since the school was expanded to 60 places per year, families living within the school's designated area (catchment) who applied on-time for a Reception place have been able to secure a place. Over the last ten years, in only one year, 2022, were some on-time applications unsuccessful, and these related to families not living in the designated area. The school has a history of attracting pupils from outside the designated area, who would have been able to access a school closer to home. Families who apply after the on time applications process, including families moving into the area with older primary-aged children, may find the relevant year group is full and be unable to secure a place at the school, but this has become less of an issue in recent years as most/all year groups now have spaces.

OCC welcome the safeguarding of the school expansion land as part of Policy BL2: Land East of Tadmerton Road ('Painters Farm'). It should be recognised however, that the expansion land may not be required; the school is already 2 forms of entry and the next size up would be 2.5 forms of entry which, based on current data, would only be justified if there were to be higher levels of housing/population growth. The need and timings for any potential future school expansion will be assessed at the time of the planning application.

**District:** Cherwell

**Consultation:** Bloxham Neighbourhood Plan Pre-Submission Document 2025-2040

**Team:** OCC Property

**Date:** 14/08/2025

---

### **Policy BL2: Land East of Tadmarton Road ('Painters Farm')**

Oxfordshire County Council (OCC) Property wishes to highlight that OCC owns the playfield that is located immediately adjacent to the east boundary of the Bloxham Church of England Primary School and Pre School.

OCC Property supports the proposed safeguarding of land to the west of the existing school for the provision of a car parking and play area for the school. If it is confirmed that this land is required, it will be essential to ensure that the land secured for the expansion of the existing school will be sufficient in terms of size and will be positioned at the most optimal location to meet the school's needs. Therefore, it is advised that the developer engages with OCC at early stages of the development.

Notwithstanding this, we wish to raise several matters which arise primarily from the effects the proposed draft allocation could have on both the nursery and primary school in terms of public health and safety matters and from fears that any future development could prevent them from carrying out their educational duty.

According to the illustrative concept plan for the draft allocation policy on page 15, a developable area measuring approximately 0.7ha appears to be proposed adjacent to the OCC-controlled playfield to the north. Whilst the explanatory note on the plan's KEY explains that any new dwellings will be facing to the north, there are concerns that new dwellings could have an adverse harm to the use and amenity of the playfield during and post construction phase. OCC Property would like to see appropriate boundary treatments and separation distances to be implemented in order to ensure that there will not be any overlooking issues.

Further, OCC Property notes that an overhead cable is also proposed to be relocated to facilitate the new residential development, but the proposed new route is unclear. OCC Property would like to see this cable line relocated outside the playfield, as there are concerns that pupils could be injured in the future. OCC Property is also concerned that the installation of an overhead cable on this location could cause significant disruption to the operations of both the school and pre-school during and after construction.

Consequently, OCC Property would like it made clear in the illustrative concept masterplan what the existing and proposed cable alignments are, and how realignment will be secured. Overhead cables should not impact on the future of existing school land.

Without these key amendments to the plan, OCC Property is concerned that this draft allocation policy will not contribute to the achievement of sustainable development, will not be in general conformity with adopted strategic Local Plan policies and will also not be in compliance with national policies.

**District:** Cherwell

**Consultation:** Bloxham Neighbourhood Plan Pre-Submission Document 2025-2040

**Team:** Archaeology

**Date:** 08-08-25

---

The NPPF states that

*203. Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. (NPPF 2024, para 203)*

Neighbourhood plans therefore should include a positive strategy for the conservation of the historic environment, including archaeological sites.

This plan does not contain any policies on the historic environment, however. There is an objective to conserve and enhance the special historic character of the village in 3.2 and the surviving archaeological remains of earlier development of the village do form an integral part of this historic character.

The Plan does make reference to the Roman remains recorded in the early 1930s in the historical context section of the plan but contains no further information. In addition to these Roman remains further stone buildings of this period have been recorded to the south of this site, south of Tadmarton Road. The background section also references Bloxham's Saxon settlement but does not mention that archaeological remains have been recorded within Bloxham between Queens Street and Kings Street.

Details of the archaeological background of Bloxham can be found on [Heritage Gateway](#).

In order to meet the requirements of the NPPF, we would therefore recommend that the Neighbourhood Plan contains a policy for the identification, protection and enhancement of heritage assets, including archaeological sites as suggested below.

### **Policy - Historic Environment**

The parish's designated historic heritage assets and their settings, both above and below ground including listed buildings, scheduled monuments and conservation areas will be conserved and enhanced for their historic significance and their important contribution to local distinctiveness, character and sense of place.

Proposals for development that affect non-designated historic assets, including archaeological remains, will be considered taking account of the scale of any harm or loss and the significance of the heritage asset as set out in the National Planning Policy Framework (NPPF 2021) including heritage statements, informed by archaeological desk-based assessments and fieldwork where appropriate, setting out how heritage assets will be enhanced and protected.

This policy should also inform other policies which may impact on heritage assets and their enhancement.

### **Policy BL2: Land East of Tadmarton Road ('Painters Farm')**

This proposed allocation is located immediately west of the site of the roman buildings excavated and recorded in the 1930s. Further remains associated with this Roman settlement have been recorded during an archaeological evaluation to the south of Tadmarton Road and it is likely that this settlement extended into this area as well. This proposed development area could therefore impact on further archaeological remains related to the development of Bloxham.

This Policy should therefore include provision for an appropriate assessment of the archaeological interest of the site to understand the significance of any surviving remains so that they can be appropriately enhanced and protected during any development and used to inform the understanding of the development of Bloxham. This policy should highlight that any developer should ensure that this assessment comprises a desk-based assessment in the first instance followed by a programme of archaeological evaluation as set out in the NPPF.

**District:** Cherwell

**Consultation:** Bloxham Neighbourhood Plan Pre-Submission Document 2025-2040

**Team:** Landscape and Nature Recovery

**Officer's Title:** Senior Biodiversity Officer

**Date:** 28/08/2025

---

A specific policy on biodiversity would be welcomed with consideration of key aspects within the county such as the draft Local Nature Recovery Strategy ([Oxfordshire's Local Nature Recovery Strategy \(LNRS\) | Oxfordshire County Council](#)) which is due to be published in late 2025 and consideration of OCC's verge management policy ([CA FEB2123R10 Annex 1 - DRAFT Verge and vegetation policy.pdf](#)) which provides an opportunity for parish councils to enhance the biodiversity of their highway network through submissions using OCC's online form ([Taking action for the environment | Oxfordshire County Council](#)).

**District:** Cherwell

**Consultation:** Bloxham Neighbourhood Plan Pre-Submission Document 2025-2040

**Team:** Waste and Circular Economy

**Officer's Title:** Waste Strategy and Circular Economy Team leader

**Date:** 12/8/25

---

Waste reuse, reduction and recycling appear to have not been considered within the neighbourhood plan.

Oxfordshire councils have ambitious targets to reduce the amount of waste generated and increase the amount recycled as demonstrated in our Joint Municipal Waste Management Strategy 2018-2027.

Enabling the residents of new dwellings to fully participate in district council waste and recycling collections, for example through providing sufficient and convenient storage space for bins both inside properties and externally, will allow Oxfordshire's high recycling rates to be maintained and minimise an increase in residual waste.

Bin store provision which can accommodate the correct number of mixed recycling, refuse and food recycling bins, are safe and easy to use for both residents and waste collection crews and meets the requirements of the waste collection authority are required.

The Neighbourhood Plan may also wish to consider how their community spaces can be used to help reduce waste and build community cohesion through assets such as community fridges, space for the sharing economy (library of things), refill stations, space for local food growing etc.

**District:** Cherwell

**Consultation:** Bloxham Neighbourhood Plan Pre-Submission Document 2025-2040

**Team:** Innovate Oxfordshire

**Officer's Title:** Innovation Planning and Project Manager

**Date:** 28<sup>th</sup> Aug 2025

---

All the following recommendations are provided from the perspective of the Innovation Framework and innovation development, focusing primarily on the key policies that the council wishes to have reviewed.

### **About Innovation Framework**

Innovate Oxfordshire, the Innovation Service of Oxfordshire County Council (OCC), have developed an [Innovation Framework](#) (IF) which is a guidance document setting out the need for developers and planners to consider innovation within planning and development, ideally including putting together Innovation Plans for new developments. It covers developments of all kinds, including residential, commercial, workplace, mixed use and infrastructure development. A roadmap of forthcoming innovations and a table on futureproofing measures are also included; in addition, a template for developing an innovation plan is available. The IF is an appendix to the Local Transport and Connectivity Plan (LTCP). It is recommended that the IF and an Innovation Plan are considered for this development; the Innovation Service are available to provide guidance and consultancy.

### **Detailed Comments**

#### **Policy BL2: Land East of Tardmarton Road**

The policy aligns with several principles outlined in the Innovation Framework. For instance, multifunctional land use supports the principle of “mixed-use development”, contributing to improved land utilisation. The conversion of existing barns for community purposes also reflects the innovative concept of “repurposing traditional assets”.

Building on this, the following enhancements are recommended to further support future innovation and development:

1. It is recommended that the developer submit an innovation plan encompassing smart infrastructure, digital community services, and sustainable construction technologies. This applies regardless of the development's scale, particularly to avoid the need for retrofitting at a later stage. The Innovation Framework includes specific guidance and examples of innovation plans. Professional support is also available from Innovate Oxfordshire if required.
2. It is advised to consider age-friendly design, with particular attention to features such as smart home support systems, community health mutual aid networks, and accessible mobility and navigation technologies.
3. The viewing platform and picnic area at Hobb Hill are highlights, but further innovative use could be explored. For example, introducing augmented reality guided tours, developing ecological education trails, or collaborating with local schools to co-create art installations.

**Policy BL3: Connectivity**

The policy emphasises enhancing low-carbon connectivity through walking and cycling routes, protecting public rights of way, and reducing motor vehicle interference. This direction aligns strongly with the innovation framework. The following measures are recommended for inclusion:

1. Require developers to submit an Innovation Plan, which should include smart route design, digital navigation support, and community engagement mechanisms.
2. Emphasise inclusive design, ensuring that route planning meets the needs of disabled people, older adults, and other groups.
3. Establish a real-time feedback mechanism, such as deploying smart sensors to collect data on route usage, supporting dynamic policy adjustments.
4. Digital connectivity should also be considered. The deployment of 5G/6G networks will support smart navigation, safety monitoring, and remote assistance, which are closely linked to transport accessibility. Space should also be reserved to support future 6G network deployment, ensuring the policy remains adaptable in the long term.

**Policy BL4: Parking**

1. It is recommended that developers be required to submit an Innovation Plan focusing on Smart Parking, incorporating elements such as electric vehicle charging, shared parking solutions, and data feedback mechanisms.
2. It is advisable to reference county-level standards and the LTCP policy to enhance BL4's policy coherence and forward-looking orientation.

**Policy BL8: Local Infrastructure**

1. It is recommended that developers consider including an Innovation Plan when submitting planning applications. This could encompass:
  - Smart water monitoring systems (e.g., real-time flow and pressure monitoring).
  - A digital platform for education resource allocation (e.g., pupil place forecasting and distribution systems).
  - Modular or temporary classroom design solutions to help ease short-term capacity pressures.
2. It may also be beneficial to establish a "Community Infrastructure Feedback Platform" to gather real-time feedback from residents on water and education services. Developers could be encouraged to work with local schools to explore shared education resource models, such as joint use of after-school spaces and remote learning support.

**Policy BL9: General Design Guide**

To further enhance the policy's foresight and effectiveness, it is recommended that innovative mechanisms be introduced to strengthen sustainability, adaptability, and community engagement in design.

1. Encourage developers to submit an Innovation Plan, which may include:
  - Smart lighting systems (e.g., dynamic dimming and ecological night-time modes).

- Modular greening solutions, including movable green hedges and rain gardens.
  - Use of low-carbon or recycled materials (e.g., locally reclaimed bricks and bio-based insulation).
  - Environmental monitoring with sensors, covering air quality, noise levels, and light pollution.
  - Digital engagement platforms to gather resident feedback on design proposals.
2. Require new developments to assess their adaptability to future changes—including climate, demographic shifts, and technological evolution—during the design phase. Suggested innovation indicators include:
    - Spatial flexibility: the ability to support future functional changes or expansion.
    - Technological compatibility: provision for smart infrastructure interfaces.
    - Lifecycle carbon emissions: alignment with low-carbon building standards.
    - Climate resilience: capacity to withstand extreme weather conditions.
  3. Introduce “Community Co-Creation Workshops” at the early design stage, using digital platforms or in-person events to collect resident preferences on materials, greening, lighting, etc.
    - Employ AR/VR technologies for scenario simulations to help residents visualise the impact of design proposals on streetscapes and lifestyles.
    - Encourage developers to collaborate with local schools and arts organisations to create public art installations or landscape features that reflect local cultural identity.
  4. Integrate BL9 with broader policy frameworks to establish a systemic innovation approach:
    - Link BL9 with the Oxfordshire Street Design Guide and the National Design Guide to form a unified standard for design quality.
    - Encourage developers to consult Innovate Oxfordshire resources for expert support in design innovation

### **Policy BL14: Broadband and Mobile Communications**

1. To support greater foresight and implementation strength within the policy, it is recommended that developers be encouraged to submit an Innovation Plan focusing on Digital Connectivity, which may include:
  - Smart route design and navigation support: Integrating 5G/6G network deployment to enable intelligent navigation, safety monitoring, and remote assistance.
  - Community engagement mechanisms: Using digital platforms to gather resident feedback on communication services, thereby improving responsiveness.
  - Inclusive design: Ensuring that communication infrastructure is accessible and user-friendly for older adults, disabled individuals, and other vulnerable groups.
2. It is recommended that the policy explicitly require the reservation of space to support future communication technologies—such as 6G networks and Internet of Things (IoT) nodes—ensuring long-term adaptability.
3. Developers should be encouraged to assess the adaptability of their designs to future changes, including technological evolution, during the planning stage.

Reference may be made to the “Technological Compatibility” indicator within the Innovation Framework.

### **Policy BL15: Local Green Spaces and Other Amenity Spaces**

1. In alignment with the “Social Impact” and “System Integration” dimensions of the Innovation Framework, it is recommended that Jubilee Park, Recreation Ground, and Slade Nature Reserve be designated as “Health Infrastructure”.
2. Developers or community organisations should be encouraged to submit an Innovation Plan, which may include:
  - Nature-based wellbeing trails.
  - Community co-creation activities, such as nature observation and ecological education.
  - Digital interactive features, including AR-guided tours and smart fitness equipment.
  - Inclusive design, ensuring accessibility for people of all ages and abilities.
3. Drawing on the “Technological Integration” dimension of the Innovation Framework, it is recommended to explore ways of combining green spaces with digital technologies:
  - Sensor-based monitoring of usage frequency and ecological conditions.
  - Data platforms to support community co-management and feedback.
  - Development of a “Green Space Map” app to improve accessibility and encourage participation.
4. It is also recommended that BL15 incorporate the following performance indicators:
  - Coverage of green spaces accessible within a 10-minute walk.
  - Multifunctionality of spaces, including ecological, recreational, and educational uses.
  - Opportunities for social interaction, such as seating, shading, and lighting.
  - Connectivity with existing walking and cycling networks.

As evidenced in the comments, there is a consistent emphasis on encouraging developers to submit an Innovation Plan, with recommendations covering a broad range of thematic areas. For further details and guidance on the Innovation Plan, please refer to the relevant sections of the [Innovation Framework](#) or contact Innovate Oxfordshire directly for advice. [Contact | Innovate Oxfordshire](#)

## **Annex 2 Member Comments**

**District:** Cherwell

**Consultation:** Bloxham Neighbourhood Plan Pre-Submission Document 2025-2040

**Member:** Councillor David Hingley

**Division:** Adderbury, Bloxham and Bodicote

**Date:** 01/09/2025

---

It will be vital that the appropriate infrastructure is considered and put in place ahead of any significant new developments in Bloxham. The village has experienced a large amount of housing growth over the past decade (several hundred units) and continues to be highly attractive to development. The cumulative impact of this development has significant impact on matters such as the local highways network, in particular on the High St (A361) through the middle of the village, and medical infrastructure, where the local surgery is in heavy demand not just in Bloxham but in surrounding communities also. While according with national policies, as well as with the emerging Cherwell DC Local Plan to 2042, the Neighbourhood Plan must therefore be permitted to take full account of such infrastructure matters to fulfil its function as an integral document in the planning process giving meaningful expression to community concerns.

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

---

[Redacted]

Dear Sir/Madam,

Thank you for notifying the Cotswolds National Landscape Board of the Neighbourhood Planning (General) Regulations 2012 (as amended) – Regulation 14 consultation on the Bloxham Neighbourhood Plan.

As Bloxham parish is at its nearest point around 7.5km from the boundary of the Cotswolds National Landscape, the Board does not wish to comment upon the Neighbourhood Plan.

Best regards,

[Redacted]

[Redacted]



Dear Consultee, please see attached letter regarding the publication and consultation relating to the draft Bloxham Neighbourhood Development Plan 2025-2040.  
Thanks, Theresa

Theresa Goss  
Clerk and Responsible Financial Officer to Bloxham Parish Council

T: 01295 710965

E: [clerk@bloxhamparishcouncil.gov.uk](mailto:clerk@bloxhamparishcouncil.gov.uk)

W: [www.bloxhamparishcouncil.gov.uk](http://www.bloxhamparishcouncil.gov.uk)

Visit the PC web site to sign up to the Parish Council's mailing list

Follow Bloxham Parish Council on Facebook

This email and any attachments is intended for the named recipient only. If you have received this e-mail by mistake please do not use, disclose, store or copy any of its contents, instead please delete this e-mail from your system and inform the sender. E-mail transmission cannot be guaranteed to be secure or error-free as information could be intercepted, corrupted, lost, destroyed, arrive late or incomplete, or contain viruses. Cotswolds National Landscape does not accept liability for any errors or omissions in the content of this message, which arise as a result of e-mail transmission. We may monitor any communication entering or leaving our systems for quality control or compliance purposes and use spam filters. Cotswolds National Landscape has taken reasonable precautions to minimise the risk of software viruses, but we recommend that any attachments are virus checked before they are opened. Cotswolds National Landscape and Cotswolds Conservation Board are the trading names of the Conservation Board for the Cotswolds Area of Outstanding Natural Beauty. Registered Office: Cotswold Business Centre, 2 A P Ellis Road, Upper Rissington, Gloucestershire, GL54 2QB



# Defence Infrastructure Organisation

Defence Infrastructure Organisation  
Base Support Wing Headquarters  
RAF Brize Norton  
Carterton, Oxfordshire  
OX18 3LX  
United Kingdom

Ref: 25/9/OxonCherwell/BStJ-NP-Ltr

Telephone: [REDACTED]

E-mail: [REDACTED]

Bloxham Parish Council

By email only to: [REDACTED]  
Copied to: [REDACTED]

11 September 2025

Dear Bloxham Parish Council,

***Modified Bloxham Community Neighbourhood Plan 25-40 – Pre-submission Version July 25 consultation.  
Comments on behalf of the SoSD.***

The Defence Infrastructure Organisation (DIO) write on behalf of the Secretary of State for Defence, in response to the above consultation. Firstly, we would like to thank the Parish Council for the opportunity to comment on the draft plan.

As referenced in the emerging plan the Ministry of Defence (MOD) owned RAF Barford St John site is within the plan area. The site is under operational control of the 422 Air Base Group of the United States Air Force.

Copied below (and attached) is a plan showing the extent of the MOD safeguarding zone applicable for RAF Barford St John. Within that area (under the provisions of the Town and Country Planning (General Procedure) Order 1995 the planning authority is required to consult the MOD (via [REDACTED] [REDACTED]) regarding development proposals. Any large-scale developments (defined as multiple residential developments or other permanent structures) would be considered inappropriate within that zone due to critical operational requirements, stemming from the potential for interference with critical radio communications systems. Detailed assessments outlining these concerns are available upon request.

## National Policy

Paragraph 200 of the National Planning Policy Framework (December 2024) states that “Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established” before going on to require the applicant or ‘agent of change’ to “provide suitable mitigation before the development has been completed.”

Furthermore, Paragraph 102 of the NPPF requires that planning decisions take into account defence requirements by ensuring that operational sites (and therefore by association the activities carried out by those sites) are not affected adversely by the impact of other development proposed in the area.

### Option 2 (Site 5)

As shown on the plan below (and attached) the site being brought forward in the emerging Neighbourhood Plan extends within the Barford St John safeguarding zone.

Therefore, the proposed development included in option 2 (site 5) is contrary to National Planning Policy and therefore the Parish Council (and Cherwell Planning Authority) are requested to engage further over these proposals before the plan is submitted to address these objections.

The 422 Air Base Group is committed to working with the community and the MOD to find mutually agreeable solutions that address both local development needs and the critical operational requirements of RAF Barford St John.

Should you have any queries regarding the above please do not hesitate to contact me on the above email in the first instance. DIO's Statutory Safeguarding team may respond separately and their comments should be considered alongside the comments herewith.

[REDACTED]

[REDACTED]

[REDACTED]

Chartered Town Planner, MSc, ACM, ARICS, FRTPI, FWCMT

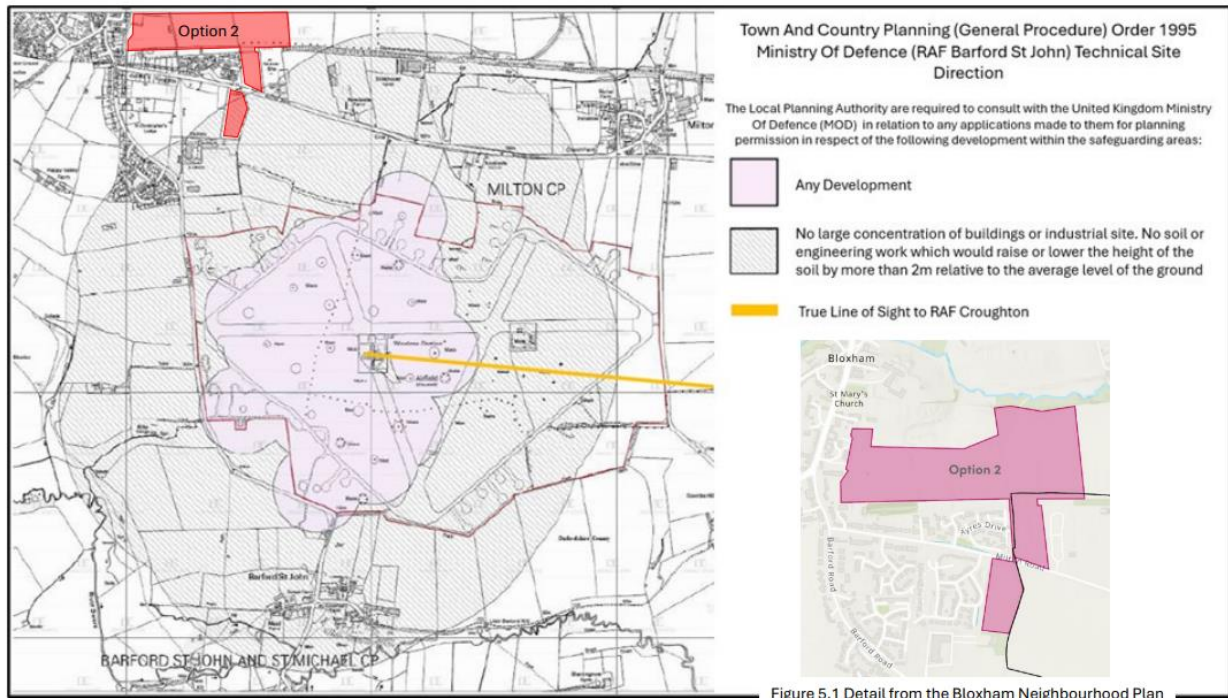


Figure 5.1 Detail from the Bloxham Neighbourhood Plan

Submitted by: [REDACTED]

Submitted time: Aug 4, 2025, 2:02:21 PM

## Contact details

First name

[REDACTED]

Last name

[REDACTED]

Are you responding as an individual or as a representative of a wider group?

**Responding on behalf of a group**

Please name the group here

**Milton village meeting**

Email address

[REDACTED]

Do you consent to your contact details being passed to Cherwell District Council (CDC)?

**Yes, I agree**

## Policy BL15: Local Green Spaces & Other Amenity Spaces

Finally, do you have any comments about the Modified Bloxham Neighbourhood Plan as a whole?

**As a separate village Milton does not feel it should necessarily comment on Bloxham s Neighbourhood Plan except where it may affect Milton.**

**We note that Site 3 is in Milton Parish and are pleased it has not been considered without Milton's input. In any event Site 5 would impact Milton, especially traffic and gradual urbanisation of the gap between the villages and we are pleased this has not been pursued, especially the easternmost field.**

**In general the plan looks well thought through and we're we in a position to, Milton village would generally offer its support Individual villagers will express their comments separately**

**I**



Direct Dial: [REDACTED]

[REDACTED]  
Clerk & Responsible Financial Officer,  
Bloxham Parish Council

Our ref: PL00799344

by email only: [REDACTED]

15 July 2025

Dear Ms Goss,

**Ref: Bloxham Neighbourhood Development Plan Regulation 14 Consultation**

Thank you for inviting Historic England to comment on the Regulation 14 Pre-Submission Draft of the Bloxham Neighbourhood Plan.

We welcome the production of this neighbourhood plan, but do not consider it necessary for Historic England to be involved in the detailed development of your strategy at this time. We would refer you to our advice on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>.

For further specific advice regarding the historic environment and how to integrate it into your neighbourhood plan, we recommend that you consult your local authority's planning and conservation advisers, and if appropriate the Historic Environment Record at Oxfordshire County Council.

To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely,

[REDACTED]  
[REDACTED]  
[REDACTED]



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)



[REDACTED]

[REDACTED]

[REDACTED]

I am writing in relation to the following:

SEA/SA/IIA: Strategic Environmental Assessment/ Sustainability Appraisal/ Integrated Impact Assessment  
Bloxham Neighbourhood Plan SEA Scoping Report  
[Case Ref. PL00798430; HE File Ref. CHA; Your Reference. ]

Thank you for consulting Historic England about your Draft Strategic Environmental Assessment Report for Bloxham Neighbourhood Plan. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully considered at all stages and levels of the local planning process.

Neighbourhood Plans are an important opportunity for local communities to set the agenda for their places, setting out what is important and why about different aspects of their parish or other area within the neighbourhood area boundary, and providing clear policy and guidance to readers who are interested members of the public, planners or developers regarding how the place should develop over the course of the plan period.

We welcome the production of this neighbourhood plan and are pleased to see that the historic environment of your parish features throughout this draft.

Although your neighbourhood area does contain a number of designated heritage assets, at this point we don't consider there is a need for Historic England to be involved in the detailed development of the strategy for your area, but we offer some general advice and guidance below, which may be of assistance. The conservation officer at your local Council will be the best placed person to assist you in the development of the Plan with respect to the historic environment and can help you to consider and clearly articulate how a strategy can address the area's heritage assets.

Paragraph 190 of the National Planning Policy Framework (2021) sets out that Plans, including Neighbourhood Plans, should set out a positive strategy for the conservation and enjoyment of the historic environment. In particular, this strategy needs to take into account the desirability of sustaining and enhancing the significance of all types of heritage asset where possible, the need for new development to make a positive contribution to local character and distinctiveness; and ensure that it considers opportunities to use the existing historic environment to help reinforce this character of a place.

It is important that, as a minimum, the strategy you put together for your area safeguards those elements of your neighbourhood area that contribute to the significance of those assets. This will ensure that they can be enjoyed by future generations of the area and make sure your plan is in line with the requirements of national planning policy, as found in the National Planning Policy Framework.

The government's National Planning Practice Guidance on neighbourhood planning is clear that, where relevant, Neighbourhood Plans need to include enough information about local heritage to guide local authority planning decisions and to put broader strategic heritage policies from the local authority's local plan into action but at a neighbourhood scale. Your Neighbourhood Plan is therefore an important opportunity for a community to develop a positive strategy for the area's locally important heritage assets that aren't recognised at a national level through listing or scheduling. If appropriate this should include enough information about local non-designated heritage assets, including sites of archaeological interest, locally listed buildings, or identified areas of historic landscape character. Your plan could, for instance, include a list of locally important neighbourhood heritage assets, (e.g. historic buildings, sites, views or places of importance to the local community) setting out what factors make them special. These elements can then be afforded a level of protection from inappropriate change through an appropriately worded policy in the plan. We refer you to our guidance on local heritage listing for further information: HE Advice Note 7 - local listing: <https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7>

The plan could also include consideration of any Grade II listed buildings or locally designated heritage assets which are at risk or in poor condition, and which could then be the focus of specific policies aimed at facilitating their enhancement. We would refer you to our guidance on writing effective neighbourhood plan policies, which can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/policy-writing/>

If you have not already done so, we would recommend that you speak to the staff at local authority archaeological advisory service who look after the Historic Environment Record and give advice on archaeological matters. They should be able to provide details of not only any designated heritage assets but also non-designated locally important buildings, archaeological remains and landscapes. Some Historic Environment Records may be available to view on-line via the Heritage Gateway ([www.heritagegateway.org.uk](http://www.heritagegateway.org.uk)). It may also be useful to involve local voluntary groups such as a local Civic Society, local history groups, building preservation trusts, etc. in the production of your Neighbourhood Plan, particularly in the early evidence gathering stages.

Your local authority might also be able to provide you with more general support in the production of your Neighbourhood Plan, including the provision of appropriate maps, data, and supporting documentation. There are also funding opportunities available from Locality that could allow the community to hire appropriate expertise to assist in such an undertaking. This could involve hiring a consultant to help in the

production of the plan itself, or to undertake work that could form the evidence base for the plan. More information on this can be found on the My Community website here: <http://mycommunity.org.uk/funding-options/neighbourhood-planning/>.

The Conservation Area may have an appraisal document that would ordinarily set out what the character and appearance of the area is that should be preserved or enhanced. The neighbourhood plan is an opportunity for the community to clearly set out which elements of the character and appearance of the neighbourhood area as a whole are considered important, as well as provide specific policies that protect the positive elements, and address any areas that negatively affect that character and appearance. An historic environment section of your plan could include policies to achieve this and, if your Conservation Area does not have an up to date appraisal, these policies could be underpinned by a local character study or historic area assessment. This could be included as an appendix to your plan. Historic England's guidance notes for this process can be found here: HE Advice Note 1 - conservation area designation, appraisal and management, and here: <https://historicengland.org.uk/images-books/publications/understanding-place-historic-area-assessments/>. The funding opportunities available from Locality discussed above could also assist with having this work undertaken.

The NPPF (paragraphs 124 - 127) emphasises the importance placed by the government on good design, and this section sets out that planning (including Neighbourhood Plans) should, amongst other things, be based on clear objectives and a robust evidence base that shows an understanding and evaluation of an area, in this case the Parish of Bloxham. The policies of neighbourhood plans should also ensure that developments in the area establish a strong sense of place and respond to local character and history by reflecting the local identity of the place ? for instance through the use of appropriate materials, and attractive design.

Your neighbourhood plan is also an opportunity for the community to designate Local Green Spaces, as encouraged by national planning policy. Green spaces are often integral to the character of place for any given area, and your plan could include policies that identified any deficiencies with existing green spaces or access to them or aimed at managing development around them. Locality has produced helpful guidance on this, which is available here: <https://mycommunity.org.uk/resources/neighbourhood-planning-local-green-spaces>.

You can also use the neighbourhood plan process to identify any potential Assets of Community Value in the neighbourhood area. Assets of Community Value (ACV) can include things like local public houses, community facilities such as libraries and museums, or again green open spaces. Often these can be important elements of the local historic environment, and whether or not they are protected in other ways, designating them as an ACV can offer an additional level of control to the community with regard to how they are conserved. There is useful information on this process on Locality's website here: <http://mycommunity.org.uk/take-action/land-and-building-assets/assets-of-community-value-right-to-bid/>.

Communities that have a neighbourhood plan in force are entitled to claim 25% of Community Infrastructure Levy (CIL) funds raised from development in their area. The Localism Act 2011 allows this CIL money to be used for the maintenance and on-going costs associated with a range of heritage assets including, for example, transport infrastructure such as historic bridges, green and social infrastructure such as historic parks and gardens, civic spaces, and public places. As a Qualifying Body, your neighbourhood forum can either have access to this money or influence how it is spent through the neighbourhood plan process, setting out a schedule of appropriate works for the money to be spent on. Historic England strongly recommends that the community therefore identifies the ways in which CIL can be used to facilitate the conservation of the historic environment, heritage assets and their setting, and sets this out in the neighbourhood plan. More information and guidance on this is available from Locality, here: <https://mycommunity.org.uk/resources/community-infrastructure-levy-neighbourhood-planning-toolkit/>

If you are concerned about the impact of high levels of traffic through your area, particularly in rural areas, the 'Traffic in Villages' toolkit developed by Hamilton-Baillie Associates in conjunction with Dorset AONB Partnership may be a useful resource to you.

Further information and guidance on how heritage can best be incorporated into Neighbourhood Plans has been produced by Historic England, including on evidence gathering, design advice and policy writing. Our webpage contains links to a number of other documents which your forum might find useful. These can help you to identify what it is about your area which makes it distinctive, and how you might go about ensuring that the character of the area is protected or improved through appropriate policy wording and a robust evidence base. This can be found here: <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>. Historic England Advice Note 11- Neighbourhood Planning and the Historic Environment, which is freely available to download, also provides useful links to exemplar neighbourhood plans that may provide you with inspiration and assistance for your own. This can be found here: <https://historicengland.org.uk/images-books/publications/neighbourhood-planning-and-the-historic-environment/>. The following general guidance also published by Historic England may also be useful to the plan forum in preparing the neighbourhood plan or considering how best to develop a strategy for the conservation and management of heritage assets in the area. It may also be useful to provide links to some of these documents in the plan:

HE Advice Note 2 - making changes to heritage assets: <https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/>

HE Good Practice Advice in Planning 3 - the setting of heritage assets: <https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/>

If you are considering including Site Allocations for housing or other land use purposes in your neighbourhood plan, we would recommend you review the following two guidance documents, which may be of use:

HE Advice Note 3 - site allocations in local plans: <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans>

HE Advice Note 8 - Sustainability Appraisal and Strategic Environmental Assessment : <https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>

We recommend the inclusion of a glossary containing relevant historic environment terminology contained in the NPPF, in addition to details about the additional legislative and policy protections that heritage assets and the historic environment in general enjoys.

Finally, we should like to stress that this advice is based on the information provided by your correspondence. To avoid any doubt, this does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed neighbourhood plan, where we consider these would have an adverse effect on the historic environment.

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours Sincerely



Work with us to champion heritage and improve lives. Read our Future Strategy and get involved at [historicengland.org.uk/strategy](http://historicengland.org.uk/strategy).

This e-mail (and any attachments) is confidential and may contain personal views which are not the views of Historic England unless specifically

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

**FAO: Bloxham Parish Council**

**Our Reference: NH/25/12024**

**Re: Bloxham Neighbourhood Development Plan 2025-2040 – Regulation 14 Consultation**

Dear Sir or Madam

Thank you for your letter dated 10 July 2025 inviting us to comment on the above consultation.

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

We will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the M40 motorway.

We have reviewed information available on your planning portal and have 'No Comments'.

Please continue to consult us on planning matters via our team's inbox:

[Redacted]

Regards



**Booked Leave:**

This email may contain information which is confidential and is intended only for use of the recipient/s named above. If you are not an intended recipient, you are hereby notified that any copying, distribution, disclosure, reliance upon or other use of the contents of this email is strictly prohibited. If you have received this email in error, please notify the sender and destroy it.

**National Highways Limited | General enquiries: 0300 123 5000 | National Traffic Operations Centre, 3 Ridgeway, Quinton Business Park, Birmingham B32 1AF | <https://nationalhighways.co.uk> | [info@nationalhighways.co.uk](mailto:info@nationalhighways.co.uk)**

*Registered in England and Wales no 9346363 | Registered Office: Bridge House, 1 Walnut Tree Close, Guildford, Surrey GU1 4LZ*

Consider the environment. Please don't print this e-mail unless you really need to.

The logo for Natural England, featuring the words "NATURAL ENGLAND" in white capital letters on a green rectangular background.

Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ  
T 0300 060 3900

[REDACTED]  
[REDACTED]  
**BY EMAIL ONLY**  
[REDACTED]

[REDACTED]  
**Bloxham Neighbourhood Plan - Pre-submission Regulation 14 Consultation**

Thank you for your consultation on the above dated 10 July 2025.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

**Natural England does not have any specific comments on this draft neighbourhood plan.**

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in [Natural England's Standing Advice on protected species](#) .

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.

For any further consultations on your plan, please contact: [REDACTED]

[REDACTED]  
[REDACTED]  
[REDACTED]

## Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

### Natural environment information sources

The [Magic](#)<sup>1</sup> website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, [National Parks \(England\)](#), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available from [the Association of Local Environmental Records Centres](#) .

**Priority habitats** are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)<sup>2</sup>. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

**National Character Areas** (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)<sup>3</sup>.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#)<sup>4</sup> website and also from the [LandIS website](#)<sup>5</sup>, which contains more information about obtaining soil data.

### Natural environment issues to consider

The [National Planning Policy Framework](#)<sup>6</sup> sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)<sup>7</sup> sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

### Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

<sup>1</sup> <http://magic.defra.gov.uk/>

<sup>2</sup> <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

<sup>3</sup> <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

<sup>4</sup> <http://magic.defra.gov.uk/>

<sup>5</sup> <http://www.landis.org.uk/index.cfm>

<sup>6</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>7</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)<sup>8</sup>), such as Sites of Special Scientific Interest or [Ancient woodland](#)<sup>9</sup>. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

### Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)<sup>10</sup>) or protected species. To help you do this, Natural England has produced advice [here](#)<sup>11</sup> to help understand the impact of particular developments on protected species.

### Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see [Guide to assessing development proposals on agricultural land](#)<sup>12</sup>.

## **Improving your natural environment**

Your plan or order can offer exciting opportunities to enhance your local environment and should provide net gains for biodiversity in line with the [National Planning Policy Framework](#). If you are setting out policies on new development or proposing sites for development, you should follow the biodiversity mitigation hierarchy and seek to ensure impacts on habitats are avoided or minimised before considering opportunities for biodiversity enhancement. You may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development and how these could contribute to biodiversity net gain and wider environmental goals.

Opportunities for environmental enhancement might include:

- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to reduce impacts on wildlife.
- Adding a green roof to new buildings.
- Providing a new footpath through the new development to link into existing rights of way.

Site allocations should be supported by a baseline assessment of biodiversity value. The statutory [Biodiversity Metric](#) may be used to understand the number of biodiversity units present on allocated sites. For small development allocations the [Small Sites Metric](#) may be used. This is a simplified version of the statutory [Biodiversity Metric](#) and is designed for use where certain criteria are met. Further information on biodiversity net gain including [planning practice guidance](#) can be found [here](#)

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision. Natural England's [Green Infrastructure Framework](#) sets out further information on green infrastructure standards and principles
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance](#)<sup>13</sup>).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks or on verges, changing hedge cutting timings and frequency).

<sup>8</sup> <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

<sup>9</sup> <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

<sup>10</sup> <https://www.gov.uk/government/publications/habitats-and-species-of-principal-importance-in-england>

<sup>11</sup> <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

<sup>12</sup> <https://www.gov.uk/government/publications/agricultural-land-assess-proposals-for-development/guide-to-assessing-development-proposals-on-agricultural-land>

<sup>13</sup> <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

Natural England's [Environmental Benefits from Nature tool](#) may be used to identify opportunities to enhance wider benefits from nature and to avoid and minimise any negative impacts. It is designed to work alongside the statutory [Biodiversity Metric](#) and is available as a beta test version.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

OFFICIAL

#### Network Rail response on Neighbourhood Plans.

Network Rail is a statutory consultee for any planning applications within 10 metres of relevant railway land (as the Rail Infrastructure Managers for the railway, set out in Article 16 of the Development Management Procedure Order) and for any development likely to result in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway (as the Rail Network Operators, set out in Schedule 4 (J) of the Development Management Procedure Order).

Network Rail is also a statutory undertaker responsible for maintaining and operating the railway infrastructure and associated estate. It owns, operates and develops the main rail network. Network Rail aims to protect and enhance the railway infrastructure, therefore any proposed development which is in close proximity to the railway line or could potentially affect Network Rail's specific land interests will need to be carefully considered.

Network Rail – railway specific advice notice to LPAs/Developers Please note that whilst Network Rail (NR) is submitting responses via the planning application process, it should be born in mind by the LPA/developer that the operational railway presents risks/issues that are different/unique to the risks posed by works taking place adjacent to non-railway undertaker land. Works on this site therefore must be undertaken with the supervision of NR via the ASPRO (asset protection) team to ensure that the works on site do not impact the safe operation, stability, integrity of the railway & its boundary. The LPA/developer are advised that unauthorised works adjacent to the railway boundary could impact the operation of nationally significant infrastructure & the applicant would be liable for any and all damages & costs caused by any works undertaken in this scenario. Therefore, the developer is requested to ensure that the development meets with NR requirements for works/developments adjacent to the railway boundary which include planning material considerations as well as obligations specific to the railway undertaker. The interface is via a NR BAPA (basic asset protection agreement) – the developer is advised that the works must not commence on site (even if planning permission is granted) until agreed with NR. The applicant will be liable for all costs incurred by NR in facilitating, reviewing this proposal.

### Asset Protection Comments:

Developments in the policy area should be notified to Network Rail to ensure that:

- (a) Access points / rights of way belonging to Network Rail are not impacted by developments within the area.
- (b) That any proposal does not impact upon the railway infrastructure / Network Rail land e.g.
- Drainage works / water features
  - Encroachment of land or air-space
  - Excavation works
  - Siting of structures/buildings less than 2m from the Network Rail boundary / Party Wall Act issues
  - Lighting impacting upon train drivers' ability to perceive signals
  - Landscaping that could impact upon overhead lines or Network Rail boundary treatments
  - Any piling works
  - Any scaffolding works
  - Any public open spaces and proposals where minors and young children may be likely to use a site which could result in trespass upon the railway (which we would remind the council is a criminal offence under s55 British Transport Commission Act 1949)
  - Any use of crane or plant
  - Any fencing works
  - Any demolition works
  - Any hard standing areas

For any proposal adjacent to the railway, Network Rail would request that a developer constructs (at their own expense) a suitable steel palisade trespass proof fence of at least 1.8m in height.

All initial proposals and plans should be flagged up to the Network Rail Town Planning at the following address:

Email: [TownPlanningNWC@networkrail.co.uk](mailto:TownPlanningNWC@networkrail.co.uk)

### Railway Station

Consideration should be given in Transport Assessments to the potential for increased footfall at Railway Stations as a result of proposals for residential development / employment areas within the neighbourhood area. Location of the proposal, accessibility and density of the development, trip generation data should be considered in relation to the station. Where proposals are likely to increase footfall and the need for car parking, the council should include developer contributions (either via CIL, S106) to provide funding for enhancements as part of planning decisions.

### Level Crossings

Developments within the neighbourhood area should be accompanied by a TS/TA which includes consideration of the impact of proposals upon any level crossings with mitigation implemented as required. We would encourage the Council to adopt specific policy wording to ensure that the impact of proposed new development (including cumulative impact) on the risk at existing level crossings is assessed by the developer(s), and

suitable mitigation incorporated within the development proposals and funded by the developer(s). TS/TAs should be undertaken in conjunction with the local highways authority with advice from Network Rail. Contributions will be sought where proposals impact on level crossings to mitigate the impacts of those developments. Where level crossing closure is the only option, the applicant is advised that closure would be via s257 of the T&CPA, and that closure would be required before the occupation of any dwellings.

Network Rail – railway specific advice notice to LPAs/Developers Please note that whilst Network Rail (NR) is submitting responses via the planning application process, it should be born in mind by the LPA/developer that the operational railway presents risks/issues that are different/unique to the risks posed by works taking place adjacent to non-railway undertaker land. Works on this site therefore must be undertaken with the supervision of NR via the ASPRO (asset protection) team to ensure that the works on site do not impact the safe operation, stability, integrity of the railway & its boundary. The LPA/developer are advised that unauthorised works adjacent to the railway boundary could impact the operation of nationally significant infrastructure & the applicant would be liable for any and all damages & costs caused by any works undertaken in this scenario. Therefore, the developer is requested to ensure that the development meets with NR requirements for works/developments adjacent to the railway boundary which include planning material considerations as well as obligations specific to the railway undertaker. The interface is via a NR BAPA (basic asset protection agreement) – the developer is advised that the works must not commence on site (even if planning permission is granted) until agreed with NR. The applicant will be liable for all costs incurred by NR in facilitating, reviewing this proposal.

**From**

[Redacted content]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

Good morning

Stratford-on-Avon District Council have no comments to make on the plan.  
Kind regards,

[Redacted]

**Policy Technician (Planning and Housing)**

[Redacted]

[Redacted]

**WARNING:** This email originated from outside of Stratford-on-Avon District Council.  
**THINK TWICE:** Do not click links or open attachments unless you recognise the sender and know the content is safe.

[Redacted]

[Redacted]



Paragraph 26 of the revised NPPF goes on to state: *“Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....”*

The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that *“Adequate water and wastewater infrastructure is needed to support sustainable development”* (Paragraph: 001, Reference ID: 34-001-20140306).

Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:

- The developments demand for water supply infrastructure;
- The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and
- The surface water drainage requirements and flood risk of the development both on and off site and can it be met.

Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water’s free pre planning service are available at: <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

In light of the above comments and Government guidance, the Neighbourhood Plan should include a specific reference to the key issue of the provision of wastewater/sewerage and water supply infrastructure to service development proposed in a policy. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend that the Neighbourhood Plan include the following policy/supporting text:

***“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”***

***“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”***

### **Water Efficiency/Sustainable Design**

The Environment Agency has designated the Thames Water region to be “seriously water stressed” which reflects the extent to which available water resources are used. Future

pressures on water resources will continue to increase and key factors are population growth and climate change.

Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support the mains water consumption target of 110 litres per head per day (105 litres per head per day plus an allowance of 5 litres per head per day for gardens) as set out in the NPPG (Paragraph: 014 Reference ID: 56-014-20150327) and support the inclusion of this requirement in the Policy.

Thames Water promote water efficiency and have a number of water efficiency campaigns which aim to encourage their customers to save water at local levels. Further details are available on the our website via the following link:  
<https://www.thameswater.co.uk/Be-water-smart>

It is our understanding that the water efficiency standards of 105 litres per person per day is only applied through the building regulations where there is a planning condition requiring this standard (as set out at paragraph 2.8 of Part G2 of the Building Regulations). As the Thames Water area is defined as water stressed it is considered that such a condition should be attached as standard to all planning approvals for new residential development in order to help ensure that the standard is effectively delivered through the building regulations.

Within Part G of Building Regulations, the 110 litres/person/day level can be achieved through either the 'Calculation Method' or the 'Fittings Approach' (Table 2.2). The Fittings Approach provides clear flow-rate and volume performance metrics for each water using device / fitting in new dwellings. Thames Water considers the Fittings Approach, as outlined in Table 2.2 of Part G, increases the confidence that water efficient devices will be installed in the new dwelling. Insight from our smart water metering programme shows that household built to the 110 litres/person/day level using the Calculation Method, did not achieve the intended water performance levels.

Proposed policy text:

***“Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption) using the ‘Fittings Approach’ in Table 2.2 of Part G of Building Regulations. Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.”***

### **Flooding and Drainage**

The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".

Flood risk sustainability objectives and policies should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.

We support the reference to sewer flooding issues due to groundwater ingress in the area on pages 97 and 98.

With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.

Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.

SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.

With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Neighbourhood Plan ***“It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”***

Also to mitigate flood risk both on and off-site: ***“surface water drainage system discharge rates should be restricted to the equivalent Greenfield Qbar runoff rate or as close as practically possible, but never greater than 2 litres per second per hectare (2l/s/Ha).”*** in line with CIRIA guidance.

### **Site Allocations**

The attached table provides Thames Water's site specific comments from desktop assessments on sewage/waste water treatment works capacity in relation to the proposed development areas, but more detailed modelling may be required to refine the requirements.

We recommend Developers contact Thames Water to discuss their development proposals by using our pre app service via the following link: <https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity>

It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution.

We recommend developers attach the information we provide to their planning applications so that the Council and the wider public are assured wastewater and water supply matters for the development are being addressed.

Where developers do not engage with Thames Water prior to submitting their application, this will more likely lead to the recommendation that a Grampian condition is attached to any planning permission to resolve any infrastructure issues.

We trust the above is satisfactory, but please do not hesitate to contact David Wilson on the above number if you have any queries.

Yours faithfully,



Thames Water Property Town Planner

Site ID	Site Name	STW Catchment	Waste Network RAG Assessment	STW RAG Assessment	Water Network RAG Assessment	Additional Comments
79378	BL2: Land East of Tadmarton Road ('Painters Farm')	Bloxham				

Clerk to Parish Council  
 Bloxham Parish Council  
 3 Tanners Close  
 Middleton Cheney  
 OX17 2GD



9<sup>th</sup> September 2025

Dear Sir/ Madam

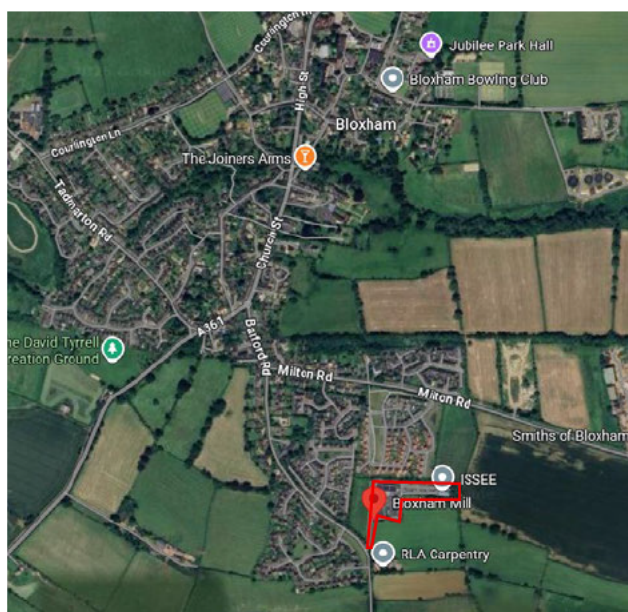
**Modified Bloxham Community Neighbourhood Plan 2025-2040. Pre-Submission Version: July 2025**

**Response to Consultation of NDP**

**BLOXHAM MILL, BARFORD ROAD, BLOXHAM, OX15 4FF**

Rackham Planning Ltd are instructed by Bloxham Mill Ltd to respond to the Bloxham Neighbourhood Plan (BNP2), which is published for statutory consultation under Regulation 14 of the Neighbourhood Planning (General) Regulations until 15th September 2025.

Bloxham Mill lies to the south east of Bloxham, accessed from Barford Road, between two recent residential developments off of Dickenson Road (to the north) and Sutton Drive (to the west). It is located adjacent to a dedicated area of public open space to the west and agricultural land to the south and west (see image 1 below)



*Image 1: Location of Bloxham Mill (Source: Google maps)*

Bloxham Mill was acquired in 2000, having previously operated as a carpet factory which closed with the loss of around 50 manufacturing jobs. Since then, reflecting the region's changing economic landscape, Bloxham Mill has evolved into a modern, vibrant business hub. It now offers a wide range of flexible workspaces—including serviced offices, co-working areas, meeting rooms, and shared facilities—serving small and medium-sized enterprises across north Oxfordshire.

Over the past 5–10 years, significant investment has been made to modernise the site and create high-quality spaces designed to meet the needs of both current and future tenants. Today, Bloxham Mill provides workspace for over 200 clients, with future plans for an enhanced employment/service offering evolving.

Sustainability is at the heart of these developments, with Bloxham Mill setting a clear goal of becoming carbon neutral by 2027.

The Copse is situated within Bloxham Mill and is a modern, energy efficient self-contained office building forming part of the established Bloxham Mill business centre with access to on-site amenities.

Bloxham Mill Ltd consider it crucial for the employment opportunities offered by Bloxham Mill to be fully reflected in the emerging NDP. In this regard, Bloxham Mill Ltd representations are set out below.

Under “The Village Economy”, the NDP refers to Bloxham Mill as follows:

*“A newer edition, Bloxham Mill, built in the ~~2010s~~ 2000 to the south of the village currently houses around 70 businesses, including a mix of permanent offices, offering professional and financial services, research and development, training and services. Additional meeting, co-working and office workspace is also available for short term hire”.*

Bloxham Mill fully **support** the recognition of the importance of the facility in strongly contributing to employment and economic opportunities in Bloxham. The correct date is included in red text.

National Policy supports sustainable development and a thriving economy. The National Planning Policy Framework (NPPF) (updated in December 2024) confirmed that

*“The purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development and supporting infrastructure in a sustainable manner...”. (para 7).*

With respect to building a strong, competitive economy, **para 85** of the NPPF confirms:

*“Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic*

*growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future.”*

Support for employment development is reflected in the Cherwell Local Plan 2011-2031 (adopted 2015), including **Policy SLE 1** (Employment Development).

Bloxham Mill request that the importance of employment development in Bloxham is recognised as one of the objectives in **Section 3.2** of the Neighbourhood Plan. The following objective is suggested:

***“To sustain and strengthen Bloxham’s local economy by enabling appropriate and sustainable business development within the settlement boundary”***

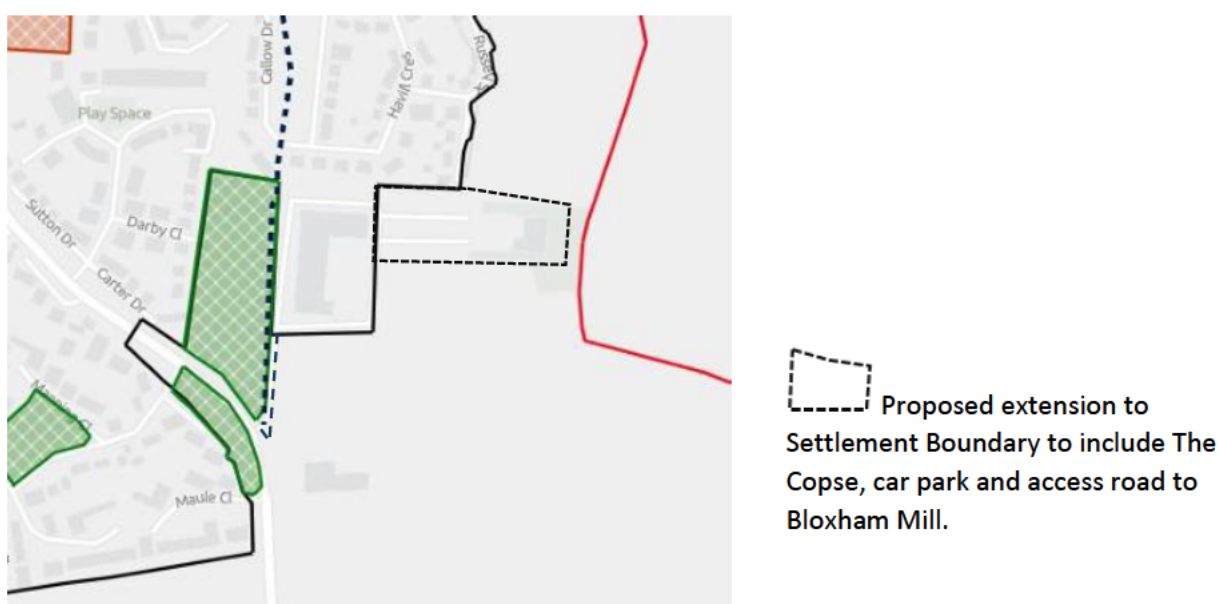
Bloxham Mill provides a unique facility not available elsewhere locally, offering high-quality workspace that reduces the need to commute, supports local enterprises, and delivers environmental benefits through sustainable practices and a commitment to carbon neutrality. Bloxham Mill Ltd request that the NDP is explicit in its in-principle support for sustained and enhanced employment workspace at Bloxham Mill.

#### **Policy BL1: Spatial Plan for Bloxham**

**Policy BL.1** states that development proposals located within the Settlement Boundary will be supported in principle. Currently, only part of Bloxham Mill Business Park falls within this boundary (refer to extract in **Image 2**). To ensure that future development at Bloxham Mill Business Park is eligible for support under **Policy BL.1**, Bloxham Mill respectfully requests that the proposed Spatial Plan for Bloxham (**Policy BL.1**) be amended to fully incorporate the entirety of Bloxham Mill Business Park within the defined Settlement Boundary as illustrated in **Image 3**



**Image 2:** Settlement Boundary in Draft NDP



**Image 3:** Proposed amendment to Settlement Boundary in Draft NDP

Additionally, Bloxham Mill request reference to employment development in Bloxham is included in the Spatial Plan for Bloxham (Policy BL.1), as follows:

New criteria D: ***“Local employment growth will be supported by enabling appropriate business development within Bloxham”.***

**Policy BL12: Employment Land**

Bloxham Mill support the recognition of the importance of the Business Park in the emerging NDP (as set out on page 21 – extract below.

*“Bloxham has a dynamic and successful mix of micro-businesses mostly operating from homes or from Bloxham Mill Business Centre. In the interest of sustainability, we will encourage spaces that foster start-up and expansion of such businesses provided these do not negatively impact neighbouring residential dwellings.”*

Criteria A of **Policy BL12** seeks to protect the loss of land or buildings in an established E use class and sets out criteria against which any such proposals should be assessed. This is supported by Bloxham Mill. However, Bloxham Mill consider that the requirement in criteria A (i) (extract below) is too onerous, could stifle alternative development opportunities and does not meet the flexibility requirements set out in the **para 86 (e)** of the NPPF, which states that:

*“Planning policies should ...e) be flexible enough to accommodate needs not anticipated in the plan, and allow for new and flexible working practices and spaces to enable a rapid response to changes in economic circumstances.”*

It is considered that the development plan site marketing requirements (in **Policy SLE1**) are sufficient to protect employment land and that the additional criteria (specifically, the 5 year requirement) in **Policy BL12 A(i)** should be removed.

### Policy BL12: Employment Land

- A. Development proposals that will result in the loss of land or buildings with an established Class E use will not be supported unless it can be demonstrated that, in addition to the development plan site marketing requirements:
- i. there is no realistic prospect of the land or buildings serving another Class E, F1 or F2 use within five years; and
  - ii. to take account of any new demand for employment land later in the plan period there are alternative locations elsewhere within the Settlement Boundary that would be suitable in principle for a Class E use.

Policy BL12 goes to state that:

- C. Proposals to develop a new Class E(g) business use of less than 150 square metres gross internal area will be supported, provided they do not adversely affect the amenity of any adjoining residential property.

Bloxham Mill consider that 150 sqm is limited and wish to see additional flexibility in this policy for employment development more generally, which meets the wider policies in the adopted Development Plan and does not adversely affect the amenity of adjoining residential property. Bloxham Mill therefore request that the floorspace figure is removed from this policy.

## Summary

In summary, Bloxham Mill Ltd support the thrust of the emerging NDP and the recognition of the important role of Bloxham Mill to the local economy. They wish to see the settlement boundary amended to include the entire business park and wish to see employment as a key objective in the NDP.

I trust that the above representation will be fully considered in the development of the NDP. If you would like to discuss the content of this representation further, please do not hesitate to contact me by either email (address below) or telephone (07971 860610).

[Redacted]

[Redacted]

[Redacted]

**Rackham Planning Limited**

[Redacted]

[Redacted]

Submitted by: Anonymous user

Submitted time: Sep 12, 2025, 2:58:20 PM

## Contact details

First name

[REDACTED]

Last name

[REDACTED]

Are you responding as an individual or as a representative of a wider group?

**Responding on behalf of a group**

Please name the group here

**Bloxham CE Primary School**

Email address

[REDACTED]

Do you consent to your contact details being passed to Cherwell District Council (CDC)?

**Yes, I agree**

## Policy BL2: Land East of Tadmarton Road ('Painters Farm')

Do you have any comments about Policy BL2: Land East of Tadmarton Road ('Painters Farm')

**The school notes and welcomes the inclusion of land dedicated to its expansion, should this be necessary, but notes that as detailed in the preceding commentary the preferred method of transport within the village is by car. As in most parts of our country, the local roads become extremely congested at the start and close of the school day, impacting on traffic passing through as well as families dropping off. Tadmarton Road is no exception to this. Whilst the school does not object to the site and is grateful to the Parish Council for the time given to consideration of a suitable site, we would request that concerns regarding parking, safe crossing for pupils and their families as well as suitable pavements on both sides of the Tadmarton Road are incorporated. Thus responding to concerns raised to the school by both families and members of the public.**

**EDGARS PLANNING**

Bloxham Parish Council  
c/o Clerk & Responsible Financial Officer  
3 Tanners Close  
Middleton Cheney  
Banbury, OX17 2GD

Our Ref: 2711  
Date: 13/08/2025

**REPRESENTATIONS ON BLOXHAM NEIGHBOURHOOD PLAN 2025-2040 REGULATION 14 CONSULTATION**

Dear Sir/Madam,

Edgars have been instructed by Bloxham School to submit the following representations in respect of Bloxham Neighbourhood Plan 2025-2040 Regulation 14 Consultation.

**The Village Economy (p.8-9)**

With five educational settings within the Parish, it is considered that the contribution of these schools to the local economy – in particular Bloxham School as both an educator and a business – should be acknowledged. Bloxham School is a significant local employer within the village (for both teaching and non-teaching jobs) as well as procuring a range of goods and services locally with associated benefits for the local village economy.

**Policy BL3: Connectivity (p.16)**

The School seeks clarification with regards to what is meant by supporting text which reads 'Paths that still meander through green village fields offer residents of all ages quick access to healthy and traffic-free exercise', and request that this is reworded to make specific reference to footpaths, bridleways and other permissive paths, thereby making it clear that informal or unauthorised routes across private land within and around the village are not de facto covered by this policy.

**Policy BL4: Parking (p.16-17)**

Policy BL4 section D states that '*Proposals to alter or extend a dwelling that will lead to the loss of off-street parking capacity will not be supported.*' The School supports the need to manage and minimise on-street parking within the village, but request that this policy (or the supporting text) is amended to make it clear that proposals that are able to provide satisfactory alternative off-street parking (e.g., elsewhere on a plot) will be supported, in order that proposals for alterations and extensions are not unnecessarily restricted where sufficient off-street parking can still be provided to serve the dwelling.

**Policy BL12: Employment Land (p.21)**

The School seeks clarification as to why Policy BL12 only covers Class E, and not Classes B2 and B8 employment land. As currently drafted, the policy also makes no provision for a change of use of



**EDGARS PLANNING**

employment land between categories B2, B8 and Class E (where appropriate), nor does it make provision to support small scale B2/B8 proposals in suitable locations that will make a positive contribution to the local economy.

The School also seeks clarification as to why a change of use to *any* of the uses specified within use classes F1 and F2 (i.e., without qualification) would be acceptable under criteria A(i), when the purpose of the policy is to protect employment land. The Parish Council may wish to consider whether a separate policy relating to community uses might be more appropriate.

With regards to the requirements under BL12 A(i) (that applicants must demonstrate that there is no realistic prospect of the land or buildings serving another Class E, F1 or F2 use within five years) and A(ii) (that any development resulting in the loss of Class E land should have to demonstrate that there are alternative locations elsewhere within the settlement boundary that would be suitable in principle for Class E use later in the plan period), these are considered to be unnecessarily onerous and unreasonable.

Within a village setting such as Bloxham is it considered that forecasting demand for Class E, F1 and F2 uses over a five-year period is unreasonable, and that the usual requirements that a site is marketed for a reasonable period of time and/or that evidence of non-viability is provided at the time of an application – should be sufficient to safeguard employment land within a village setting such as Bloxham.

With regards to A(ii), it will be extremely challenging for any applicant to identify or prejudge whether land or buildings in a current use *may* become available at some point in the future for employment uses. It is also noted that the village settlement boundary has been drawn extremely tightly, making this requirement even more challenging (the policy states that alternative locations must be within the settlement boundary).

The School therefore requests that the wording of Policy B12 is reviewed to ensure that it is reasonable and justified; that reference to a five-year period is deleted from A(i); and criteria A(ii) deleted altogether. Evidence of marketing and/or viability at the time of any application should be sufficient to justify a change of use. The scope of F1 and F2 uses as currently referenced in this policy should also be reviewed, and consideration given to how proposals for suitable B2 and B8 development can be supported.

**Policy BL13: Village Centre (p.22)**

The School supports the importance of the village centre in serving the needs of the village and surrounding area. Supporting text references the range of **shops, cafes and local services** within the village centre. The School therefore questions whether it is the intention of BL13 (B) to only support development proposals for new **retail** or the expansion of existing **retail** units within the village centre. It is suggested that the policy wording is amended to support other equally suitable village (town) centre uses that would not fall within the category of 'retail'.

**Policy BL15: Local Greenspaces & Other Amenity Spaces (p.23)**

It is requested that the 3<sup>rd</sup> para of supporting text under policy BL15 – '*The contribution of garden space to the overall visual impact should not be ignored and to prevent a potential cumulative loss of openness proposed development of gardens will not in general be supported*' is deleted.



## EDGARS PLANNING

It is considered that such a blanket statement is both unreasonable and unnecessary; development proposals within gardens should be considered on a case by case basis and their impact will be suitably managed and assessed through other relevant Neighbourhood and Local Plan policies.



**Policy BL1: Spatial Plan for Bloxham (p.12) and Policies Map (p.25)**

The School welcomes the use of an interactive policy map, but note that the current link provided in the NP only gives access to those with an existing ArcGIS username and password. Under these permissions, it is not publicly accessible, nor does it allow new users to set up an account to gain access. The School requests that the interactive version of the map is made publicly available to all alongside the NP, without the need to set up a login/account.

The Policies Map currently shown on p.25 has overlapping layers and boundaries which makes it very difficult to interpret - in particular the extent of the built-up area as defined by the settlement boundary where this is obscured by other layers; it is important that the settlement boundary is shown definitively and clearly within the NP to avoid any future uncertainty.

The School also requests that the extent of the BL1 settlement boundary is reviewed, particularly along the eastern boundary of the village where it has been drawn extremely tightly and appears to exclude key buildings such as St Mary’s Church which would typically be within the settlement boundary. Likewise, although the resolution is poor within the published NP, it appears that gardens associated with some properties (i.e., residential curtilage) may also have been unnecessarily excluded from the settlement boundary.

Given the nature of the site and the community use which it provides, it is also requested that the settlement boundary is redrawn to include the Dewey sports centre, tennis courts, car park and astro pitches, as shown in Figure 1 below.



Figure 1: Dewey sports centre and astros, outlined in red



Inset 1: North Bloxham p.26

Please note that the figure on page 26 does not show the full eastern extent of the settlement and needs to be amended accordingly so that it captures all of north Bloxham.

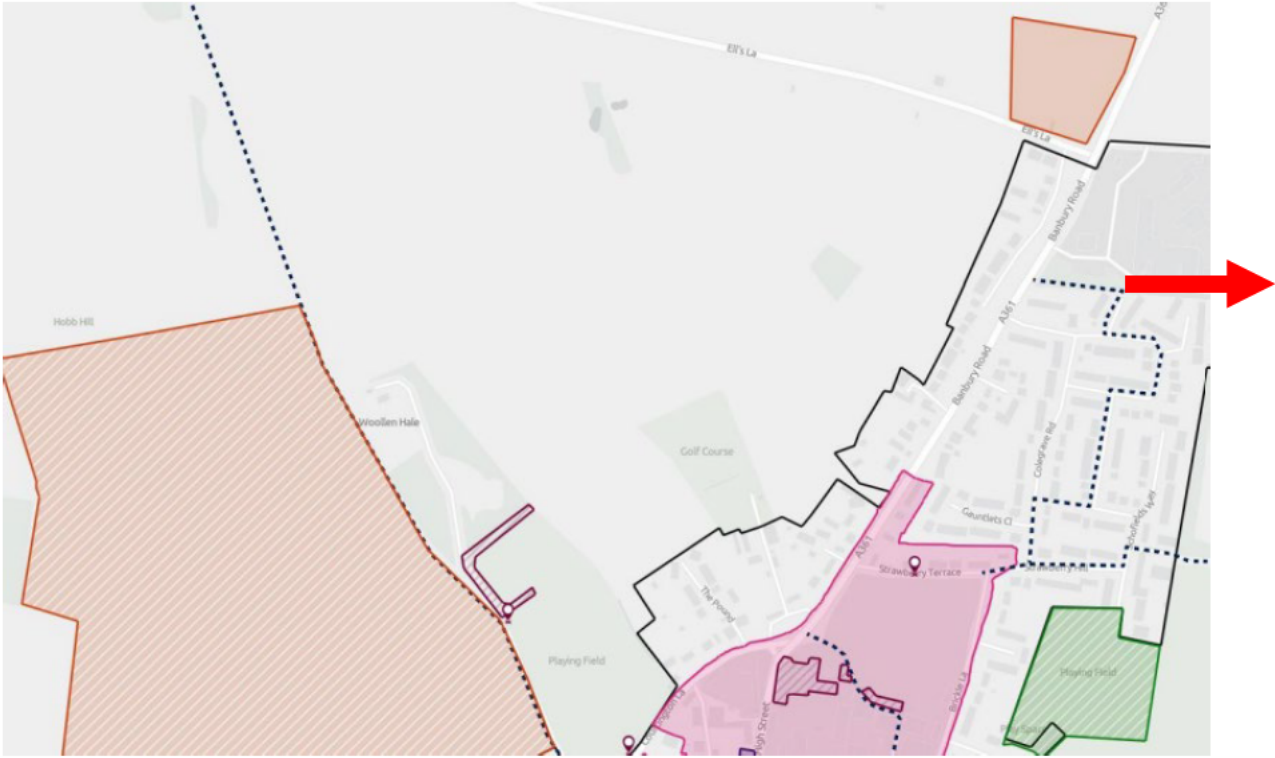


Figure 2: Inset One: North Bloxham needs to be amended to capture the eastern extent of the village



Appendix A (p.30)

We note that the Dewey site is (rightly) not identified as a Local Green Space in Policy BL15 and correspondingly on the policies map on page 25. However, it has been coloured green on *Plan A: Long List of Sites for Assessment* on p.30. We request that Plan A is amended (or a clarifying note added) for the avoidance of doubt.



Figure 3: The Dewey site (outlined in red) should not be identified as a local greenspace on Plan A

We trust that these comments are of use to the Parish Council in preparing the Submission draft of the Neighbourhood Plan. Please do not hesitate to contact us on behalf of the School if you would like further clarification any of the points raised in this letter.

Yours sincerely

[Redacted signature]

Associate Director, Edgars

[Redacted contact information]

[Redacted contact information]

[Redacted contact information]

[Redacted contact information]

12th September 2025

Bloxham Parish Council  
3 Tanners Close  
Middleton Cheney  
Banbury  
OX16 2GD

By email: Bloxhamparishcouncil@gmail.com

Our Ref: 4436

Dear Theresa,

**Regulation 14 Consultation Response – Modified Bloxham Community Neighbourhood Plan 2025–2040 Representation on behalf of David Wilson Homes South Midlands**

On behalf of our client, David Wilson Homes South Midlands (“DWH”), we are writing to set out our comments on the Modified Bloxham Community Neighbourhood Plan (“mBNDP”) which has been published under Regulation 14 of the Neighbourhood Planning (General) Regulations 2011 (as amended). As the Parish is aware, DWH has interest in Land West of South Newington Road (“Site 15”). It remains the intention of DWH to make a planning application during 2025.

DWH acknowledge the need for the Neighbourhood Plan to be kept up-to-date and the challenging position that the Parish has found itself in in respect of the delays to the Cherwell Local Plan Review. There is much to commend in respect of the difficult choice made to identify a housing requirement for the Parish based on the standard method and allocate a site. Nevertheless, we have several fundamental concerns with the plan as published. These relate to:

- (a) The timing of the review and risks to the robustness and confidence of the public in the Neighbourhood Plan as presented;
- (b) The publicity and publication of the documents for comment with many of the key evidence documents not being published at this time;
- (c) The approach to site selection and weight given to the expansion of the primary school without evidence of need (and contrary to the published assessment and declining roll numbers)
- (d) The absence of a sustainability appraisal which has informed the options; and
- (e) Flawed and unjustified dismissal of sites including Site 15 without a proper understanding of the potential community benefits or the opportunity to actively participate in discussions.

We urge the Parish Council to carefully consider the matters raised within these representations.



### **Scope of Review:**

The mNDP is a review of the Bloxham Neighbourhood Development Plan (Made December 2016). The Draft Modification Statement (Appendix C to the plan) states the proposed modifications change the nature of the plan. Accordingly, it will be subject to examination against the basic conditions and, based on paragraph 2.11 of the Draft Plan, the Parish Council anticipate a referendum will be required.

**DWH strongly agree with these observations**, and in particular welcome the acknowledgement that the plan including the proposed allocation at Painters Farm should be robustly tested against the Basic Conditions as prescribed in in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004, namely:

- (a) having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).  
[...]
- (d) the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development
- (e) the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
- (f) the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations; and
- (g) prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).

### **Timing of Review:**

DWH has **no objection** to the principle updating of the BNDP and recognises an up-to-date policy framework is one of the best ways to ensure that the homes, green spaces, social infrastructure and investment in an area can be achieved.

However, whilst the plan is now 8-years old (made in December 2016) we question if the timetable is optimal, particularly as the Cherwell Local Plan review has now been submitted and will undergo examination at a similar time (albeit we would anticipate examination of the Local Plan taking the 'adoption' into mid- 2026 at the earliest).

Whilst there is nothing within regulations or guidance that *prevents* a Neighbourhood Plan being progressed in advance of a Local Plan (and the 'test' is conformity with *adopted* policy), the Parish should consider the potential risk that policies including those which distribute homes to the rural areas could supersede the mBNDP and the implications for this in terms of the risks of the plan having support at referendum for:

- (a) the preferred site to be allocated to 125 homes,
- (b) the housing needs (as calculated against the 'new' standard method rather than the plan should the current distribution and requirement(s) in the Local Plan review be found 'sound'.



Moreover, the Parish should be advised that planning applications submitted *after* the adoption of the Local Plan will be resolved in favour of the most recently adopted document<sup>1</sup> which may not be the mBNDP.

Given the Cherwell Local Plan Review is now submitted the Parish Council should delay submission to avoid the need to revisit the neighbourhood plan following adoption and achieve the aims of shaping development in the village as intended. This should also include extending the plan period to 2042 to align with the Cherwell Local Plan review.

### **Modified Bloxham Neighbourhood Plan:**

Turning to the plan and its evidence, as currently published the plan would breach the basic conditions, in particular condition (d) in respect of sustainable development; (e) conformity with the *adopted* strategic policies; (f) obligations in relation to the preparation and publication of the Sustainability Appraisal and (g) the prescribed conditions in respect of publicity.

### **The Prescribed Conditions:**

The modified plan was advertised for consultation between 12<sup>th</sup> July 2025 and the 15<sup>th</sup> September 2025 (a period of 9 weeks). However, the material did not appear on the Parish Council's website until mid-August. The screenshot, below, taken on the 29<sup>th</sup> of August 2025 shows the material having been uploaded "two weeks ago" on the 15<sup>th</sup> August.

## Draft Modified Bloxham Neighbourhood Plan

Posted 2 weeks ago (15/08) by Theresa Goss

### **Bloxham Neighbourhood Plan**

**As Bloxham residents, adopting the Draft Modified Bloxham Neighbourhood Plan is your decision. YOU will have the opportunity to vote in a Referendum early 2026.**

#### **Existing Neighbourhood Plan 2016 - 2031**

Our existing Neighbourhood Plan is more than halfway through its life cycle and as such, carries less weight with the Local Planning Authority, particularly with regard to housing developments. Government changes to planning law and housing targets introduced in late 2024 have resulted in Cherwell District Council (CDC) not being able to meet its housing land supply target, which means a tilted balance in favour of development, which in turn is resulting in an avalanche of developers wanting to build in Bloxham. Currently in the Parish there are approved, proposed and possible planning applications amounting to approx. 850 homes. In addition, there are recently approved developments in Hook Norton and Milcombe for a further 120.

#### **Developing the Draft Modified Bloxham Neighbourhood Plan 2025 – 2040:**

The Draft Modified Bloxham Neighbourhood Plan is being prepared under the Localism Act 2011, the Neighbourhood Planning (General) Regulations 2012 and in the context of the adopted Cherwell Local Plan (CLP) 2011-2031 (Part 1) (2015) and the emerging Cherwell Local Plan Review (LPR) 2042. In December 2024, AECOM was commissioned by Bloxham Parish Council to create a Housing Needs Assessment for Bloxham, and in February 2025 were commissioned to create a Strategic Environmental Assessment (SEA) as part of the development of the Draft Modified Bloxham Neighbourhood Plan (both reports are available on the Parish Council website).

Regulation 14 of the Neighbourhood Planning (General) regulations state:

<sup>1</sup> 38(5) of the Planning and Compulsory Purchase Act 2004

#### **Other recent news stories**

- Parish Council Statement - August 2025
- Information Session - Postponed 28.08.25
- Parish Council Grants 2026/2027
- Draft Modified Bloxham Neighbourhood Plan
- Parish Council Objection - 25/01009/OUT - Land East of Barford Road, Bloxham
- Courtington Lane/Workhouse Lane Flooding Update 8 August 2025

**14.** Before submitting a plan proposal [or a modification proposal] to the local planning authority, a qualifying body must—

(a) publicise, in a manner that is likely to bring it to the attention of people who live, work or carry on business in the neighbourhood area—

(i) details of the proposals for a neighbourhood development plan [or modification proposal];

(ii) details of where and when the proposals for a neighbourhood development plan [or modification proposal] may be inspected;

(iii) details of how to make representations; ...

(iv) the date by which those representations must be received, being not less than 6 weeks from the date on which the draft proposal is first publicised; [and]

(v) in relation to a modification proposal, a statement setting out whether or not the qualifying body consider that the modifications contained in the modification proposal are so significant or substantial as to change the nature of the neighbourhood development plan which the modification proposal would modify, giving reasons for why the qualifying body is of this opinion;]

(b) consult any consultation body referred to in paragraph 1 of Schedule 1 whose interests the qualifying body considers may be affected by the proposals for a neighbourhood development plan [or modification proposal]; and

(c) send a copy of the proposals for a neighbourhood development plan [or modification proposal] to the local planning authority.

The plan was not appropriately publicised to those who live, work or carry on business in the area. No formal notification was sent to either DWH nor the landowners beyond the publication on the website and the village Facebook group; the consultation was therefore deficient in relation to regulation 14(a). Moreover, the choice to consult over the August period (something we observe the Parish Council has been critical of in the past in respect of developer and council-led consultations) places many of those with an interest in the area, for example the schools, at a significant disadvantage. This is a fundamental flaw that alone makes the plan deficient in its approach.

Taking the 15<sup>th</sup> as the date on which the material was **published** on the Parish Council's website, would result in a period of consultation of 4-weeks. This does not comply with regulation 14(iv) which requires a period of *at least* 6-weeks. The simple act of dating the consultation as July is not acceptable as all material must be available for comment. **The current consultation has not met basic condition g as it has not been publicised in accordance with regulation 14(a).**

#### **Housing Need and Requirement:**

We welcome the steps that Bloxham PC has taken to proactively identify a housing requirement for its plan. Housing Need in the mBNDP is predicated on an apportionment of homes as calculated using the new standard methodology. Appendix A to the Neighbourhood Plan sets out the justification for the approach. Whilst we support the principle of this approach and find it to be consistent with the

aims of National Policy, it could be seen as conflicting with the *adopted* policies of the Cherwell Local Plan and prejudicing the rural distribution set out within the Cherwell Local Plan Review which will be subject to examination against the tests of soundness.

Therefore, whilst we support the principle of identifying more homes in an eminently sustainable settlement, caution needs to be exercised to understand if the approach is:

- (a) Conformity with the adopted plan and whether the approach would undermine the strategic distribution being significantly higher in percentage terms;
- (b) Conformity with the emerging plan and its approach to identifying housing needs for the district in the period to 2042; and
- (c) the number of homes that will be *delivered* as factored into the calculation, particularly from Hartshill Close (which will require a Reserved Matters Application).

Therefore, whilst we support the proactive stance taken by the Parish Council, there are significant risks associated when assessed against basic conditions e and d (as assessed against the spatial distribution as tested under the Sustainability Appraisal which underpins the Cherwell Local Plan Review).

#### **Site Selection & Sustainability Appraisal:**

Paragraph 072 of the Planning Practice Guidance (PPG) makes clear that a qualifying body must present **sufficient and proportionate evidence** to show how a neighbourhood plan will contribute to sustainable development, including identifying any adverse effects and how these will be mitigated.

The Planning Policy Guidance for Neighbourhood Plans ('the PPG') gives advice at paragraph 49 as to the pre-submission consultation:

#### **At what stage does the pre-submission consultation take place on a draft neighbourhood plan or Order?**

*Before the formal pre-submission consultation takes place a qualifying body should be satisfied that it has a complete draft neighbourhood plan or Order. It is not appropriate to consult on individual policies for example. Where options have been considered as part of the neighbourhood planning process earlier engagement should be used to narrow and refine options. The document that is consulted on at the pre-submission stage should contain only the preferred approach.*

Paragraph: 049 Reference ID: 41-049-20140306

The Draft Plan states that the AECOM site options assessment informed the allocation decision. Whilst Appendix A: *Site Assessment and Selection* provides an overview, the assessment is not made available on the Parish Council's website, preventing consultees from understanding its scoring, methodology, or the weight attached to different criteria. This lack of transparency is inconsistent with the principles of positive plan-making as per paragraph 16 of the NPPF and fails to provide the evidence required to justify the rejection of reasonable alternatives, such as Site 15.



SEA:

The Draft Plan and its published evidence base do not include a Sustainability Appraisal (SA) or equivalent structured assessment at an early stage, despite Appendix A of the SEA Environmental Report (prepared by AECOM) itself noting that SA should be considered. We note also the erroneous reference to the 'Bentley Neighbourhood Plan' within Appendix A, which undermines confidence in the robustness of the assessment and raises questions as to whether site selection has been properly informed by a sustainability-led process, or if the preferred sites were selected and the assessment criteria structured to fit.

The absence of a proportionate, transparent sustainability assessment at the point of site selection is a significant procedural weakness. National guidance (PPG ID: 11-006-20140306) is explicit that **sustainability appraisal should be integral from the earliest stages of plan preparation**. This omission risks the Plan failing basic condition (d) as well as prejudicing those responding to this consultation and understanding the options.

Site Selection criteria:

In the absence of the published evidence, we have fundamental concerns in respect of the process to justify the selection of Painters Lane for up to 125 new homes together with a primary school extension, burial space and other facilities. We are particularly concerned by the statement on page 13:

*"It (site 1) was chosen to reflect the site's locational advantages relative to many others **and the willingness of the land promoter to agree to the scheme delivering a number of community benefits**" (emphasis added)*

The inference is that rather than site selection being based on a robust planning assessment informed by Sustainability Appraisal, site selection has been adapted to fit the preferred outcome. This statement also confirms meetings have taken place with the promoter of this site at the exclusion of other interests, including DWH who have not been afforded the same opportunities to discuss their land against the preferred assessment criteria.

In the absence of the full report, the plan relies on Appendix A to the plan. Paragraph 5 states, "*The Site options assessment concluded that ten sites were potentially suitable for allocation. The four sites AEOM considered unsuitable were sites "8, 11, 13 and 17"*"; the reasons for this are not published.

Paragraph 6 then states that the focus was on *understanding* the assessment, *correcting* any assumptions and supplementing them with information which, amongst other matters, included items of the parish's 'Community Benefits List' 2023, arguing that six items could be delivered as '*legitimate*' planning policy requirements, namely:

- Expansion of Bloxham Primary School
- Traffic Management Works
- Improvements to school parking
- Provision of a new library
- Additional burial ground and allotments land
- Additional public sports pitches land

Paragraph 17 states these were not prioritised at the time, but *“with events in the last year meaning the village has to accommodate another significant increase in new homes and population, the Parish Council has judged that increasing the village primary school was its most important priority”*.

There is no evidence presented, either from Oxfordshire County Council or an independent consultant, that the Primary School needs to be expanded within the plan period to meet the capacity of the developments referred to (namely Ells Lane and Hartshill Close). To the contrary:

- Bloxham Primary school rolls currently stand at 373 pupils against a capacity of 420 (Draft Plan, paragraph 2.8), meaning there is existing headroom for growth even with additional housing delivery.
- The Education Report submitted with the Hartshill Close Application is clear that sufficient capacity exists for growth of c.140 dwellings without any need for immediate expansion.
- As there is room on school owned land for expansion, this could be funded through developer contributions (S106/CIL) from any allocated housing site, not just Site 1;

Accordingly, the prioritisation and weight given to Site 1 based on facilitating school expansion is not supported by robust, up-to-date evidence and does not, in our view, help to aid the justification for allocating the site and would be in breach of **basic condition (a) and (d)**.

#### **Flawed dismissal of Site 15**

The reasons for rejecting Site 15 in Appendix A include its *“only the most tenuous visual connection to the village form (on the opposite side of the recreation ground).”* This assessment is materially out of date and fails to take account of the William Davis scheme on the opposite side of South Newington Road (Cherwell DC ref. 24/02541/OUT), which is subject to a resolution to grant permission for 130 homes. Once delivered, that development will redefine the southern settlement edge and materially alter Site 15’s relationship to the built form of the village. This is precisely the sort of information that could have been available if there was more transparency, and an opportunity was given to all affected parties to comment on the emerging strategy. This represents a significant lacuna in the assessment and therefore any judgements based on the current approach is likely to be found legally flawed.

Moreover, there is a strong connection with the western parcel and the existing built edge of Bloxham at Colesbourne Road which is visible from the approach to the village on the Stoke Newington Road as a ‘hard’ edge. The omission of this consented scheme from the context assessment significantly undermines the validity of the conclusion reached about Site 15’s suitability and connectivity.

Furthermore, the allocation of BL2: Painters Farm appears to conflict with the purposes of Key View 2: Hobbs Hill and is also located in an area proposed as a ‘green gap’ in the emerging local plan. Whilst an allocation in a Neighbourhood Plan is one of the exceptions in the emerging policy, an assessment against the purposes of including land within the gap e.g. the wider sensitivity factored into any assessment of sites in the planning balance. Site 15 is not within this proposed gap, a matter which should be acknowledged.

The commentary also assumes, incorrectly, that the site would be neither large enough nor well located to deliver a community benefit. Being located adjacent to the recreation ground, there are several benefits and improvements which could be directly associated including improvements to the PROW and sports facilities. Again, it is somewhat regrettable that the Parish opted not to engage at

an early stage to discuss the list of community infrastructure and understand how the site could have been planned and shaped to deliver several of these benefits.

### **Conclusion and requested modifications**


For the reasons above, we do not consider the Draft Plan in its current form to meet the basic conditions. To remedy this, the Parish Council should:

- Undertake and publish a proportionate Sustainability Appraisal at the earliest possible stage to inform site selection and understand if the preferred site is the most sustainable;
- Reassess Site 15 in light of Hartshill Close and updated contextual evidence ensuring that the full assessments are published for comment;
- Relaunch a period of consultation to allow for a fuller and more detailed response that will bring the plan to the 'attention of people who live, work or carry on business in the neighbourhood area ensuring all material is available for the full 6-week period.
- Apply consistent and evidence-based criteria to all sites, with transparent scoring.
- Review whether the allocation of Site 1 remains justified when alternative sites (including Site 15) could deliver sustainable development and required community benefits.

We request confirmation that the matters in this representation will be included in the Regulation 14 Consultation Statement, and taken into account in preparing the Regulation 16 submission version of the Plan.

Should you have any questions regarding the Site, please do not hesitate to contact me at this office.

Yours sincerely



**Eleanor Gingell MRTPI**  
Associate Director  
Smith Jenkins Ltd

Enc.



**EDGARS PLANNING**

Bloxham Parish Council  
c/o Clerk & Responsible Financial Officer  
3 Tanners Close  
Middleton Cheney  
Banbury  
OX17 2GD

Our Ref: 1136/4856  
Date: 22/08/2025

**REPRESENTATIONS TO THE BLOXHAM NEIGHBOURHOOD PLAN 2025-2040 REGULATION 14 CONSULTATION**

Dear Sir/Madam,

Edgars have been instructed by our client, Mr D Smith, to submit the following representations in respect of Bloxham Neighbourhood Plan 2025-2040 Regulation 14 Consultation.

Policy BL1: Spatial Plan for Bloxham

*Do you agree with the inclusion of Policy BL1: Spatial Plan for Bloxham?*

Yes.

*Do you have any comments about Policy BL1: Spatial Plan for Bloxham?*

Site 13 (as referred to within Appendix A, Plan A) has been previously promoted by our client as a suitable location, adjacent to the built-up area of Bloxham, for residential development. Specifically, the provision of up to five, 1-3 bedroom bungalows.

Whilst we recognise that three site allocations have been included within the draft Neighbourhood Plan—supporting the Parish's 'community benefits list' and, importantly, securing Section 106 contributions towards the delivery of a new primary school in Bloxham—our client considers that smaller sites, appropriate to the village setting and supportive of local distinctiveness, are equally important. Larger sites can often face prolonged planning stages due to extensive technical requirements, and their build-out rates may be significantly slower. Looking ahead, we strongly encourage the Parish to acknowledge the advantages of allocating or facilitating a greater proportion of smaller developments where such sites are adjacent to, or very well related to the settlement boundary. Such schemes are typically quicker and more reliable to deliver, foster local character, and provide a steadier, more dependable supply of housing and can be brought forward in sustainable locations albeit outside of a notionally drawn settlement boundary.

The NPPF supports the re use of previously developed land and recognises that smaller sites in rural locations can support the existing facilities within that community. Such sites should not be discounted



## EDGARS PLANNING

just on the basis of a settlement boundary, which sometimes can have the effect of discouraging sustainable and suitable sites to come forward.

In addition to the above, having reviewed the Bloxham Housing Needs Assessment (December 2024) which provides an evidence base to support the production of the Neighbourhood Plan, it makes clear Bloxham's current dwelling mix is strongly weighted in favour of detached homes. When comparing Bloxham to the rest of the Cherwell and England, only 5.4% are bungalows compared to 9%. With this in mind, Site 13 presents an opportune allocation aimed at providing a more reliant, deliverable supply aimed at meeting Bloxham's needs whilst respecting the edge of village setting.

As a general point, our client welcomes the use of an interactive policy map but note that the current link provided in the NP only gives access to those with an existing ArcGIS username and password. Under these permissions, it is not publicly accessible, nor does it allow new users to set up an account to gain access. Our client requests the interactive version of the map is made publicly available to all alongside the Neighbourhood Plan, without the need to set up a login/account.

The Policies Map currently shown on p.25 has overlapping layers and boundaries which makes it very difficult to interpret with any clarity due to loss of image quality when zoomed in- in particular the extent of the built-up area as defined by the settlement boundary where this is obscured by other layers; it is important that the settlement boundary is shown definitively and clearly within the NP to avoid any future uncertainty.

### Policy BL2: Land East of Tadmarton Road ('Painters Farm')

*Do you agree with the inclusion of Policy BL2: Land East of Tadmarton Road ('Painters Farm')?*

Our client does not wish to make any comment to the inclusion of Policy BL2.

*Do you have any comments about Policy BL2: Land East of Tadmarton Road ('Painters Farm')?*

Our client does not wish to make any comment to the inclusion of Policy BL2.

### Policy BL3: Connectivity

*Do you agree with the inclusion of Policy BL3: Connectivity?*

Yes.

*Do you have any comments about Policy BL3: Connectivity?*

Our client supports the inclusion of Policy BL3 but respectfully requests that the policy wording be clarified regarding the term "low-carbon connectivity". As currently drafted, it could be read as implying that pedestrian and cycle routes themselves have a carbon impact.

We suggest amending the policy to explicitly promote the provision and connectivity of pedestrian paths and cycle routes, emphasising that these modes of travel reduce reliance on less sustainable, more carbon-intensive forms of transport as well as accessibility for all users.

### Policy BL4: Parking

*Do you agree with the inclusion of Policy BL4: Parking?*

Yes.



**EDGARS PLANNING**

*Do you have any comments about Policy BL4: Parking?*

Our client supports the need to provide satisfactory parking standards within new development.

With regards to the provision of visitor parking, the provision of 0.5 spaces may not be feasible owing to viability or other technical considerations such as Biodiversity Net Gain, drainage, and landscaping etc. Therefore, we request that the wording is reviewed and is in line with the provisions of Oxfordshire County Council Parking Standards whereby a degree of flexibility is given as part of the transport submission. An example of this, is the expectation that developers will undertake an approach consistent with national research e.g. no special provision is made for visitors where at least half of the parking provision is unallocated or in other circumstances 0.2 spaces per dwelling should be for visitors. If these approaches are not feasible, flexibility is given for the provision of a maximum visitor parking level of 1 space per 5 residential units, subject to necessary justification.

Our client respectfully requests that the Parish consider the provisions outlined by Oxfordshire County Council as the basis for their emerging Neighbourhood Plan and seek to reduce the reliance on the private car in line with national planning policy wherever possible.

Should the Parish wish to retain the current wording, our client requests that further clarification/parameters is given relating to the policy wording for visitor parking 'at another convenient location'.

Policy BL3: Housing Mix

*Do you agree with the inclusion of Policy BL5: Housing Mix?*

Yes.

*Do you have any comments about Policy BL5: Housing Mix?*

Our client supports the provision of Policy BL5 which reflects an up-to-date evidence base of Housing Need within Bloxham. Having reviewed AECOMs Housing Need Assessment (paragraph 1.2.14) it makes clear that the most appropriate affordable housing tenure mix for Bloxham is 70% affordable rented provision and 30% affordable ownership options in line with Cherwell's emerging policies.

Given the draft Neighbourhood Plan as currently worded does not require the provision of any affordable housing, and that which is provided should be First Homes; our client requests the policy is revised to better reflect and suit the needs of the community. The policy does allow for some flexibility for a developer to provide a bespoke form of affordable housing under the 'First Homes' approach, the 40% under the market rate may incur some viability issues and it would be suggested that this is included within the policy.

As a general point, the policy wording is not explicit in the threshold where this is required i.e. for schemes of 10 or more dwellings, this is only explained further within the supporting text. We request this is reviewed.

Policy BL6: Adapting Homes to meet Demographic Change

*Do you agree with the inclusion of Policy BL6: Adapting Homes to meet Demographic Change?*

Yes.



**EDGARS PLANNING**

*Do you have any comments about Policy BL6: Adapting Homes to meet Demographic Change?*

Our client is very supportive of the inclusion of Policy BL6 within the draft Neighbourhood Plan, specifically the provision for at least 20% of dwellings to be bungalows. In this regard, our client is actively promoting their site for the development of up to 4 bungalows, located at land adjacent to Ridgeway House, The Ridgeway; and would welcome discussions with the Parish to outline their design intent and current assessment of the site in respect of this identified need.

It is noted the policy, as currently worded, requires schemes to provide 'a layout and landscape scheme that confers a sense of place and privacy', we request that further clarity and/or amendment is made to clarify the policy intent for providing a 'sense of space'.

Policy BL7: Residential Amenity

*Do you agree with the inclusion of Policy BL7: Residential Amenity?*

Yes.

*Do you have any comments about Policy BL7: Residential Amenity?*

Our client is supportive of the inclusion of Policy BL7.

Policy BL8: Local Infrastructure

*Do you agree with the inclusion of Policy BL8: Local Infrastructure?*

Yes

*Do you have any comments about Policy BL8: Local Infrastructure?*

Whilst our client is supportive of the inclusion of Policy BL8 in principle, it does not acknowledge many issues regarding wastewater and water supply capacity relate to matters outside of the control of many applicants. In this instance, we request that a degree of flexibility is given within the policy wording, to support schemes which are otherwise policy compliant subject to necessary upgrades.

Policy BL9: General Design Guidance

*Do you agree with the inclusion of Policy BL9: General Design Guidance?*

Yes.

*Do you have any comments about Policy BL9: General Design Guidance?*

In general terms our client is supportive of the inclusion of Policy BL9, but requests that further consideration is given to the wording of criterion vi which states 'preserve existing areas of open space and take every available opportunity to create open space to help retain rural character'. We request that the word 'public' is added to clarify this matter only relates to publicly accessible open space for recreational purposes.

Policy BL10: Design in the Conservation Area

*Do you agree with the inclusion of Policy BL10: Design in the Conservation Area?*

Our client does not wish to make any comment to the inclusion of Policy BL10.

*Do you have any comments about Policy BL10: Design in the Conservation Area?*

Our client does not wish to make any comment to the inclusion of Policy BL10.



**EDGARS PLANNING**Policy BL11: Key Streetscenes & Views

*Do you agree with the inclusion of Policy BL11: Key Streetscenes & Views?*

Our client does not wish to make any comment to the inclusion of Policy BL11 other than a typo notes the views are at Appendix A when they are contained in Appendix B

*Do you have any comments about Policy BL11: Key Streetscenes & Views?*

Our client does not wish to make any comment to the inclusion of Policy BL11.

Policy BL12: Employment Land

*Do you agree with the inclusion of Policy BL12: Employment Land?*

Our client does not wish to make any comment to the inclusion of Policy BL12.

*Do you have any comments about Policy BL12: Employment Land?*

Our client does not wish to make any comment to the inclusion of Policy BL12.

Policy BL13: Village Centre

*Do you agree with the inclusion of Policy BL13: Village Centre?*

Our client does not wish to make any comment to the inclusion of Policy BL13.

*Do you have any comments about Policy BL13: Village Centre?*

Our client does not wish to make any comment to the inclusion of Policy BL13.

Policy BL14: Broadband & Mobile Communications

*Do you agree with the inclusion of Policy BL14: Broadband & Mobile Communications?*

Our client does not wish to make any comment to the inclusion of Policy BL14.

*Do you have any comments about Policy BL14: Broadband & Mobile Communications?*

Our client does not wish to make any comment to the inclusion of Policy BL14.

Policy BL15: Local Green Spaces & Other Amenity Spaces

*Do you agree with the inclusion of Policy BL15: Local Green Spaces & Other Amenity Spaces?*

Yes.

*Do you have any comments about Policy BL15: Local Green Spaces & Other Amenity Spaces?*

With regard to the policy itself, our client is supportive of its inclusion within the Neighbourhood Plan and its overall objectives, but respectfully requests the wording is altered to specifically outline 'public open spaces' to remove any ambiguity.

Moreover, the supporting text states '*The contribution of garden space to the overall visual impact should not be ignored and to prevent a potential cumulative loss of openness proposed development of gardens will not in general be supported*'. We request this wording is deleted as such blanket statement is both unreasonable and unnecessary, whereby development proposals within gardens should be considered on a case by case basis and their impact will be suitably managed through other relevant Neighbourhood / Local Plan policies.



**EDGARS PLANNING**Land adjacent to Ridgeway House, The Ridgeway, Bloxham (ref. Site 13)

As alluded to previously within this letter, our client is actively promoting Land adjacent to Ridgeway House, The Ridgeway, Bloxham for the construction of up to 5 dwellings (including 4, 1-3 bedroom bungalows) and would welcome discussions with the Parish to present their emerging design intent and assessment of the site.

A detailed design is yet to be worked up, but proposals aim to provide a conceptual landscape-led scheme, designed to harmonise with its rural context. Our client sees the site as an opportunity for the Parish to not only address the shortfall of 2 or 3 bedroomed properties but also provide much needed bungalows, a more affordable and efficient form of home to downsize to, within the area whilst also offering significant landscape, ecology, and environmental sustainability enhancements.

Once a more detailed design has been worked up, our client would be more than happy to engage with the Parish and present the site proposals prior to the submission of any planning application.

We trust these comments are of use to the Parish Council in preparing the Submission draft of the Neighbourhood Plan. Please do not hesitate to contact us if you would like further clarification of any of the points raised in this letter.

Yours sincerely,

[REDACTED]

Associate Director, Edgars Limited

[REDACTED]

[REDACTED]



**MODIFIED BLOXHAM COMMUNITY NEIGHBOURHOOD PLAN 2025 – 2040**

**PRE-SUBMISSION VERSION: JULY 2025**

**'PAINTERS FARM'**

**LAND EAST OF TADMARTON ROAD, BLOXHAM**

**REPRESENTATIONS ON BEHALF OF**

**THE FACON FAMILY**

**SEPTEMBER 2025**

**REF: 10907**

## CONTENTS

<b>1. Introduction</b>	<b>2</b>
<b>2. Bloxham Context</b>	<b>3</b>
<b>3. Land at Painters Farm, Bloxham</b>	<b>4</b>
<b>4. Submissions to Bloxham Community Neighbourhood Plan 2025 – 2040</b>	<b>8</b>
<b>5. Aecom – Housing Needs Assessment (HNA)</b>	<b>22</b>
<b>6. Appendix A: Site Assessment &amp; Selection</b>	<b>25</b>
<b>7. Strategic Environmental Assessment</b>	<b>28</b>
<b>8. Conclusions</b>	<b>36</b>

## Appendices

**Appendix 1 – Location Plan (drawing no. 779\_L01)**

**Appendix 2 – Illustrative Masterplan (drawing no. 778-SK04)**

**Appendix 3 – Framework Plan (drawing no. 250821\_778)**

**Appendix 4 – Transport Technical Note**

**Appendix 5 – Site Access Arrangement (drawing no. ITB210268-GA-001)**

**Appendix 6 – Drainage Strategy**

**Appendix 7 – Pedestrian and Cycle Access (drawing no. ITB210268-GA-002)**

**Appendix 8 – Updated Landscape and Visual Technical Note (LVTN)**

**Appendix 9 – Preliminary Ecological Appraisal**

**Appendix 10 – Heritage Impact Assessment**

**Appendix 11 – Flood Risk Assessment**

**Appendix 12 – Ground Water Risk Assessment**

## 1. INTRODUCTION

1.1. These representations are made to the Bloxham Community Neighbourhood Plan 2025 – 2040 Pre-Submission Version (July 2025) Consultation, on behalf of the Facon Family, in relation to land at Painters Farm, Bloxham.

1.2. The Location Plan is available at **Appendix 1**.

1.3. The land promoted for housing development is edged red, with land that may be made available for a recreational asset for the community is identified edged blue.

1.4. The representations respond to the following policies and documents:

- Policy BL1: Spatial Plan for Bloxham
- Policy BL2: Land East of Tadmarton Road ('Painters Farm')
- Policy BL3: Connectivity
- Policy BL4: Parking
- Policy BL5: Housing Mix
- Policy BL6: Adapting Homes to meet Demographic Change
- Policy BL8: Local Infrastructure
- Policy BL9: General Design Guidance
- Policy BL11: Key Streetscenes & Views
- Bloxham Neighbourhood Plan Policies Map
- Aecom – Housing Needs Assessment
- Appendix A: Site Assessment & Selection
- Strategic Environmental Assessment

## 2. BLOXHAM CONTEXT

### Local Context

- 2.1. Bloxham is a large, historic village located in north Oxfordshire, approximately 3 miles south-west of Banbury and lies within the administrative area of Cherwell District Council.
- 2.2. The village has a distinctive rural character and benefits from a strong sense of identity shaped by its rich heritage and attractive built environment. The historic core is characterised by traditional ironstone architecture and includes several listed buildings, with the core of the village lying within the Bloxham Conservation Area.
- 2.3. Bloxham is served by a good range of local services and community facilities, including a primary school, doctor's surgery, shops, a post office, public houses, and sports facilities. It has a regular bus service to Banbury, which provides wider access to employment, secondary education, healthcare, and national rail connections.

### Planning Policy

#### Adopted Cherwell Local Plan 2011–2031 (Part 1)

- 2.4. Bloxham is identified as a Category A village within the adopted Cherwell Local Plan, meaning it is one of the district's most sustainable rural settlements. Category A villages site below that of the main towns, such as Banbury, Bicester and Kidlington.

#### Emerging Cherwell Local Plan 2040

- 2.5. The emerging Cherwell Local Plan 2040 continues to classify Bloxham as a Category A village, with future growth expected to remain limited in scale. The draft Plan, was submitted for examination on 5th August 2025 and reaffirms the strategic focus on directing most new development to the urban centres of Banbury, Bicester, Kidlington and Heyford Park (a new addition), and below that to Category A villages, such as Bloxham.

### 3. LAND AT PAINTERS FARM, BLOXHAM

- 3.1. Bloxham is one of the most sustainable Category A Village, and therefore some of the new homes provision to meet the rural areas requirement will be identified within Bloxham.
- 3.2. The Facon Family controls land at Painters Farm, which extends to approximately 12.36 hectares in size and has a capacity of approximately 125 dwellings, in the context of a developable area of 4.1 ha and a density of 30 dwellings per hectare.
- 3.3. The proposed site presents rich potential in advancing objectives across the three themes of the emerging plan.
- 3.4. The Facon family would like to state its great support of the additional environmental and social responsibility shown in the draft plan. As long-time locals with their family home in Milcombe, they have put great care and consideration into supporting the local and neighbourhood plans, and remaining sensitive to the concerns and needs of their local community and natural environment.
- 3.5. The Site is located on the north-western edge of Bloxham, with access taken from Tadmarton Road.
- 3.6. To the south of the site is existing residential development. Bloxham CofE Primary School and its grounds are located to the south west, also off Tadmarton Road. The western field parcel of the Site contains several agricultural buildings. To the north west of the site is an existing residential dwelling. To the north of the site is an existing agricultural field and Hobb Hill. A school playing field associated with Bloxham school abuts the Site to the east, along with the Headmasters residence.
- 3.7. The Site comprises of three agricultural grassland field parcels on broadly level ground at the foot of Hobb Hill, it also includes a large concrete area with three barns, which represent an opportunity for their re-use, a large cattle race, stone tracks, and an unfished house paused in consideration of this project.

- 3.8. The Site is compartmentalised by internal boundary vegetation, with the two smaller fields in the Site's western extents divided by a combination of remnant hedgerow; hedgerow trees, and a post and wire fence. Several agricultural buildings are established within the westernmost field parcel of the Site and this field is further compartmentalised by post and wire fencing.
- 3.9. The larger, medium-sized field in the Site's eastern extents currently forms part of a wider parcel of agricultural land that extends onto the slopes of Hobb Hill and is separated from the western field parcels by a low, intact hedgerow containing sporadic hedgerow trees.
- 3.10. The site contains a Public Right of Way along its eastern extents where PRow Footpath 136/6/20 begins off Courtington Lane and runs north along the eastern Site boundary before scaling Hobb Hill and descending to join onto Ell's Lane to the north.
- 3.11. No listed buildings are located on or near the Site, nor is the site located within the Bloxham Conservation Area. The Site is not considered to fall within the setting of any registered parks and gardens or scheduled monuments.
- 3.12. The site is located entirely in Flood Zone 1. The site is subject to a small amount of 'low risk' surface water flooding (as per EA flood maps). The low risk of surface water flooding can be designed into a potential residential development by incorporating mitigation, such as features like Sustainable Urban Drainage Systems (SUDS) which will manage rainwater runoff through methods like rain gardens, swales, and permeable pavements.
- 3.13. An Illustrative Masterplan has been prepared and is attached at **Appendix 2**. The Framework Plan is available at **Appendix 3**.
- 3.14. The site will be access from Tadmarton Road. It is proposed to position the access to the east of the existing tree at the frontage on Tadmarton Road. This is to position the vehicular access away from the speed limit change (20mph to 60mph), reducing potential conflict. This creates only a minimal stagger with Faulkener Road, representing the optimum location for the proposed vehicular access.

- 3.15. There is potential to deliver a footway along the frontage. This would comprise a short section of footpath to the south of the access and connect into the existing footway network via a crossing point.
- 3.16. The existing gated access from Courtington Lane to the site which runs through the middle of two existing dwellings is proposed to be used as a pedestrian and cycle access to the site, as well as an emergency access route, if required.
- 3.17. A 3.7m wide route can be achieved using the existing access and retained dropped kerb, with 4.5m available between boundary fences. This provides sufficient width for emergency vehicle access. It is proposed to install removable bollard so that emergency vehicles could access the site, should Tadmarton Road be blocked. This would be the only vehicular use of this access.
- 3.18. Access to the centre of the village is approximately 1km from the Tadmarton Lane access, 600m from the Courtington Lane access, and 300m from the existing PRow. The route is generally flat with adequate footway widths. Dropped kerb crossing points are available along the route.
- 3.19. In addition to the provision of housing in a sustainable location, growth at this site can provide multiple benefits to local community of Bloxham.
- Open views from Hobb Hill of the Grade I listed Church of St Mary and the wider village setting can be enhanced with the creation of a viewpoint and picnic area) overlooking Bloxham from Hobb Hill via a new footpath on Hobb Hill. This is a unique benefit that only this site can offer.
  - A new area of public open space in the eastern extent of the Site will be created, this would respect the open character of this area (mindful of Policy COM 13 Settlement Gaps), complemented by linear areas of public open space running along the development edges of the Site to maximise connectivity.
  - Land to be reserved for the future expansion of the adjacent Bloxham Church of England Primary School (including Car Park)
  - Provision of bungalows for elderly residents.
  - Proposed pedestrian and cycle access with Courtington Lane and wider village particularly for elderly walkers and users of mobility scooters.

- Potential for provision of Allotments.
- Proposed Permissive Footpath on land controlled by the Facon Family to encourage public access onto Hobb Hill.
- Indicative areas for new Sustainable Urban Drainage System (SUDS) along with renovation and improvements of existing retention ponds.
- Land to be safeguarded for a Cemetery.

#### 4. SUBMISSIONS TO BLOXHAM COMMUNITY NEIGHBOURHOOD PLAN 2025 – 2040 PRE-SUBMISSION VERSION (JULY 2025)

##### Policy BL1: Spatial Plan for Bloxham

##### **Plan Period**

- 4.1. The Plan Period for the Neighbourhood Plan is currently not consistent. The Plan currently refers to it being '2025-2040' within the title and '2024 – 2037' within Policy BL1.
- 4.2. Policy RUR 1 (Rural Areas Housing Strategy) within the submitted Cherwell Local Plan states that *"Development in the rural areas will be considered against the spatial strategy and Policy COM 1: District Wide Housing Distribution. 565 homes will be provided on sites allocated in neighbourhood plans, or this Local Plan in addition to the existing supply..."* It identifies Bloxham has providing a minimum of 75 homes within the plan period up to 2042.
- 4.3. Our view is that the plan period should be consistent with the submitted Cherwell Local Plan, and therefore end at 2042. It is also considered that the plan period should start at 2025 (given this is the base date of the standard method for housing).
- 4.4. Based upon the above, the plan period should be 2025-2042.

##### **Housing Need**

- 4.5. Policy BL1 (B) states *"The Neighbourhood Plan provides for approx. 285 homes to be delivered in the plan period 2024 – 2037"*. The supporting text to Policy BL1 states that *"As explained in Appendix A, the Parish Council has used the new Standard Method as a starting point for deriving an indicative housing figure for this policy which presently equates to 21.8 homes per year. It considers this a firm basis for planning for housing growth for the next decade or more, which will lead to a 20% increase in the number of homes in the village to 1,700. This scale of growth can be accommodated if the capacity of local infrastructure can be improved."*
- 4.6. Whilst a target is identified of 75 homes for the plan period is identified in the submitted Local Plan, this is not based upon the standard method, due to Cherwell utilising the transitional

arrangements within the Framework. The Neighbourhood Plan states that *the Parish Council has used the new Standard Method as a starting point for deriving an indicative housing figure.*

- 4.7. The standard method for assessing housing need represents the most appropriate and robust approach for calculating Bloxham's housing requirement, this methodology is consistent with national planning policy.
- 4.8. In this context, the identified figure of 21.8 homes per year is considered appropriate. We would therefore recommend that the 21.8 homes per year is extended across the plan period.
- 4.9. Extending this across the plan period would see a total requirement of 370 homes (21.8 homes per year x 17-year period).

### **Settlement Boundary**

- 4.10. We note the proposed settlement boundary, which incorporates the three sites committed and allocated for new development within Bloxham.
- 4.11. The 'East of Tadmarton Road' allocation is included within the settlement boundary.
- 4.12. The settlement boundary should be drawn to reflect only the extent of the built development, rather than encompassing the entire site as currently delineated. The proposals include community benefits within the wider site ownership, which is currently reflected on the policies map.
- 4.13. Limiting the settlement boundary to the built area will help to safeguard surrounding countryside from unwarranted encroachment, maintain the settlement's compact character, and ensure that future development is appropriately contained. Such a refinement would also support the effective application of countryside protection policies within the proposed Neighbourhood Plan and submitted Cherwell Local Plan.
- 4.14. We recommend that the Policies Map is amended to identify only the area proposed for built development (as per the red line identified at **Appendix 1**) within the Settlement Boundary.

### **Policy BL2: Land East of Tadmarton Road ('Painters Farm')**

4.15. The draft policy wording of Policy BL2 is set out below:

***Policy BL2: Land East of Tadmarton Road ('Painters Farm')***

*The Neighbourhood Plan allocates land East of Tadmarton Road ('Painters Farm'), as shown on the Policies Map, for a residential-led, mixed development scheme comprising land for residential, education, burial ground, community uses and public open space.*

*Proposals will be supported, provided:*

- *The residential scheme is for approx. 125 homes, including a proportion of bungalows suited to older person households*
- *Land is safeguarded for the expansion of the adjoining primary school and its car parking*
- *Land is made available for a burial ground with ground conditions that are suited to that purpose*
- *The existing barn on the western edge of the site is made available and safeguarded for conversion for a flexible community use (Class F1 or F2)*
- *The site is accessed by vehicles and pedestrians from Tadmarton Road and by pedestrians via public footpaths onto Courtington Lane*
- *A public open space is created as part of a landscape mitigation scheme with a new viewing platform and picnic area at Hobb Hill*
- *The site layout is formed of development parcels that retain and bolster as much of the existing site hedgerows and trees as possible*
- *The green infrastructure scheme includes the provision of a new woodland belt to connect existing assets on Hobb Hill with those on the remainder of the site*
- *The sustainable drainage strategy manages surface and ground water and is integrated with the green infrastructure*

4.16. The proposals respond to the above in the following way:

*The residential scheme is for approx. 125 homes, including a proportion of bungalows suited to older person households*

4.17. The proposed scheme, as demonstrated by the illustrative masterplan (**Appendix 2**) can achieve approximately 125 homes, as required by the policy. The illustrative masterplan has been prepared considering the constraints of the site as well as input from the consultant team. It is considered the proposed housing provision can be achieved appropriately and sensitively, taking account of the site's characteristics.

*Land is safeguarded for the expansion of the adjoining primary school and its car parking*

- 4.18. As can be seen on the illustrative masterplan, land is shown to be safeguarded for future expansion of the primary school.

*Land is made available for a burial ground with ground conditions that are suited to that purpose*

- 4.19. Land has also been safeguarded for the provision of a Cemetery, as is shown on the illustrative masterplan. Additionally, to provide further certainty, the land owners have commissioned a Groundwater Risk Assessment, to assess the suitability of the proposed land for a Cemetery.

- 4.20. The report confirms that Burial Sites can provide approximately 800 burial plots (1.5m x 3m) in an acre. A 30m buffer will be required around the ponds, while a 10m non-burial buffer will be required around the ditches which may still be used for ashes and other memorials.

- 4.21. A historical well was noted within 250m during the T2 report, and further information has been requested from the relevant authorities to establish whether the feature is or has previously been utilised as a potable water source. However, due to the age and nature of underlying aquifers this is considered unlikely.

- 4.22. The site is considered suitable for use as a burial ground and should operate under a permit exemption, with a non-burial buffer being applied any ditches.

*The existing barn on the western edge of the site is made available and safeguarded for conversion for a flexible community use (Class F1 or F2)*

- 4.23. As can be seen on the illustrative masterplan, it is proposed to retain and make available the existing large barn. This will be made available, should a suitable community use wish to convert the building.

*The site is accessed by vehicles and pedestrians from Tadmarton Road and by pedestrians via public footpaths onto Courtington Lane*

- 4.24. The illustrative masterplan proposes vehicular and pedestrian access from Tadmarton Lane. The suitability of this is confirmed by the Transport Technical Note (**Appendix 4**) and the proposed access drawing (**Appendix 5**).
- 4.25. The existing gated access from Courtington Lane to the site which runs through the middle of two existing dwellings is proposed to be used as a pedestrian and cycle access to the site.
- 4.26. A 3.7m wide route can be achieved using the existing access and retained dropped kerb, with 4.5m available between boundary fences. This provides sufficient width for emergency vehicle access. It is proposed to install removable bollard so that emergency vehicles could access the site, should Tadmarton Road be blocked. This would be the only vehicular use of this access.
- 4.27. *A public open space is created as part of a landscape mitigation scheme with a new viewing platform and picnic area at Hobb Hill*
- 4.28. The illustrative masterplan identifies a new viewpoint and picnic area on Hobb Hill as an added benefit of the scheme. This will provide views over the village. It is proposed to provide a new permissible footpath on land within the landowners control, which will incorporate the viewpoint. This is in addition to public open space within the development.

*The site layout is formed of development parcels that retain and bolster as much of the existing site hedgerows and trees as possible*

- 4.29. The proposal will seek to retain as much existing hedgerow on site as possible. A small amount of removal will be required to provide access between the development parcels in the west and east. The proposal would also be required to demonstrate 10% net gain and therefore replace and enhance any lost hedgerow and habitats.

*The green infrastructure scheme includes the provision of a new woodland belt to connect existing assets on Hobb Hill with those on the remainder of the site*

- 4.30. A new woodland belt is shown to the south east of the site, along the boundary with the Public Right of Way (PRoW). The new woodland belt will seek to screen the proposed development, running from the existing dwellings on Courtington Lane along the extent of proposed

dwellings. The proposed woodland belt will not run the full length of the PRoW to ensure that this does not become enclosed and have an adverse impact on the existing PRoW.

*The sustainable drainage strategy manages surface and ground water and is integrated with the green infrastructure*

4.31. The location and details of the SuDS can be seen drainage layouts at **Appendix 6**. It is proposed to drainage the site using two attenuation ponds and infiltration trench running along the north of the development extent.

4.32. The drainage calculations demonstrate that no flooding occurs for the 1 in 30 storm events, and any flooding for a 1 in 100 year + 40% climate change event can be safely contained on site.

4.33. The following evidence is submitted to support the allocation of this site:

- Location Plan (drawing no. 779-L01) (**Appendix 1**)
- Illustrative Masterplan (**Appendix 2**)
- Framework Plan (drawing no. 778-SK03) (**Appendix 3**)
- Transport Technical Note (**Appendix 4**)
- Site Access Arrangement (drawing no. ITB210268-GA-001) (**Appendix 5**)
- Drainage Strategy (**Appendix 6**)
- Pedestrian and Cycle Access (drawing no. ITB210268-GA-002) (**Appendix 7**)
- Updated Landscape and Visual Technical Note (LVTN) (**Appendix 8**)
- Preliminary Ecological Appraisal (**Appendix 9**)
- Heritage Impact Assessment (**Appendix 10**)
- FRA (**Appendix 11**)
- Groundwater Risk Assessment (**Appendix 12**)

#### **Updated Landscape and Visual Technical Note (LVTN)**

4.34. The Landscape and Visual Technical Note confirms the Site is not subject to any qualitative landscape designations. It is considered that the Site has the capacity to accommodate a sensitively designed residential development, provided that a high quality, landscape-led

approach to the design development is adopted that preserves the sensitive areas identified in the Bloxham Neighbourhood Plan.

- 4.35. The LVTN concludes that development *“could be accommodated without resulting in significant adverse effects on the localised or wider visual amenity and that the integrity of the receiving landscape character would be preserved, with proposed landscape features contributing positively to the identified landscape character of the area.”*

#### **Preliminary Ecological Appraisal**

- 4.36. The PEA confirms that the site is not subject to any designation.
- 4.37. The development area focuses on the three southern fields (as per the illustrative masterplan).
- 4.38. The PEA concludes that The site contains mature oak trees, seasonal drainage ponds, mature hedgerows and areas of willow scrub which are of good quality and could be of value to local wildlife populations. The remaining habitats are common and widespread and have low ecological value. No protected or notable plant species were recorded during the survey.
- 4.39. The proposed development will primarily focus on grazed grassland, resulting in the loss of grazed modified grassland. However, the addition of SUDs features, wildflower areas, new hedgerows and other enhancement areas (e.g. the cemetery) could off-set this loss.
- 4.40. The richer habitats on site (willow scrub, native hedgerows with trees) will be retained. No direct impacts to any notable habitats will occur as a result of the proposed development.
- 4.41. Areas of modified grassland will be removed during construction. Although these habitats are not particularly rich for invertebrates, they could result in the fragmentation of the local landscape. It is recommended that no further surveys are required.
- 4.42. No trees with significant roosting value will be felled due to the development. As such no significant impacts are anticipated. The proposed development will result in the loss of modified grassland but given their low value and the presence of more extensive areas of

foraging and commuting habitat in the locality, this is likely to be inconsequential for bats. The habitats on site with a high value for bats (e.g. the hedge lines with mature trees) will be retained.

- 4.43. No evidence of nesting birds was identified on or within the existing buildings on site.
- 4.44. Modified grassland will be removed during construction. The loss of such habitats is likely to be inconsequential to local reptile populations owing to their low value and the presence of more extensive habitat locally.
- 4.45. Although no ponds are being lost due to the development, it is assessed that the proposed works are highly likely to cause impacts to great crested newts. It is likely that a district level licence will need to be obtained to permit the development and subsequent disturbance of newt habitat. To inform this licence, environmental DNA (eDNA) surveys will be conducted of the ponds (P1, P3 – P8) within 500m of the site (where accessible) to determine the presence or absence of great crested newts.
- 4.46. No badger setts were noted on site or within a 30m radius of the site. Further, no evidence of foraging badgers was noted within the development area.

### **Heritage Impact Assessment**

- 4.47. The Heritage Impact Assessment concludes that any *potential harm to the significance of heritage assets could be mitigated “through ensuring that heritage constraints are key consideration in the design and planning of any future development. This could include locating any built form to the lower, southern part of the Land, restricting heights of the built form and looking for opportunities to better reveal the significance of heritage assets through creating and interpreting views.”*
- 4.48. This feedback has been taken on board, with development extent being located to the lowest part of the site, adjacent existing development on Courtington Lane.

4.49. The report concludes that heritage considerations would need to be considered, but would not preclude the ability to deliver a legislative and policy compliant development of the form set out in the policy wording.

#### **FRA**

4.50. The Flood Risk Assessment confirms that the site is located entirely within Flood Zone 1. It also confirms that the site is at 'very low risk of surface water flooding' and 'very low risk of ground water flooding'.

4.51. It is concluded that subject to mitigation measures, the site can be developed appropriate and in accordance with the NPPF.

#### **Drainage Strategy**

4.52. As per the above in regards to our response to the policy wording, the location and details of the SuDS can be seen on the drainage layouts at **Appendix 6**. It is proposed to drainage the site using two attenuation ponds and infiltration trench running along the north of the development extent. The drainage calculations demonstrate that no flooding occurs for the 1 in 30 storm events, and any flooding for a 1 in 100 year + 40% climate change event can be safely contained on site.

4.53. With regards to Foul Drainage, proposed foul flows are to discharge to a pumping station prior to connecting into the existing Thames Water network.

#### **Transport Technical Note**

4.54. The Transport Technical Note confirms that the site can be accessed appropriately. Vehicular access will be taken from a re-aligned access from Tadmarton Lane. The access will take the form of a simple priority junction with a 5.5-metre-wide carriageway and 6-metre junction radii. Visibility splays of 2.4m x 43m can be achieved to the east and 2.4m x 160m to the west.

4.55. A 2-metre-wide footway is proposed on the southeastern side of the new access road, together with a pedestrian crossing incorporating dropped kerbs and tactile paving on

Tadmarton Road. The proposed footway will enable connection into the existing footway network on the southern side of Tadmarton Road, which provides links southeast towards Bloxham.

- 4.56. The existing gated access from Courtington Lane to the site which runs through the middle of two existing dwellings is proposed to be used as a pedestrian and cycle access to the site.
- 4.57. A 3.7m wide route can be achieved using the existing access and retained dropped kerb, with 4.5m available between boundary fences. This provides sufficient width for emergency vehicle access. It is proposed to install removable bollard so that emergency vehicles could access the site, should Tadmarton Road be blocked. This would be the only vehicular use of this access.
- 4.58. Personal Injury Accident data Confirms that two accidents have occurred in the last 5 years. The recorded accidents do not suggest that there is a safety issue with the operation of the highway network and are likely due to human error.
- 4.59. The proposed development would equate to 53-56 two-way peak hour vehicle movements. It is expected that the majority of traffic would route south on Tadmarton Road and continue south towards the A44 or north towards Banbury and the M40.
- 4.60. In terms of multi-modal movements, comparable surveys within the TRICS database estimate that there would be 143 daily two-way pedestrian movements (07:00-19:00), 21 two-way daily cyclist movements and 31 daily two-way public transport movements.
- 4.61. The additional vehicular traffic would be a modest increase and would not be expected to materially impact on the safety or operation of the local road network.

### **Groundwater Risk Assessment**

- 4.62. As per the above, the site is considered suitable for use as a burial ground and should operate under a permit exemption, with a non-burial buffer being required around the ditch and ponds.

- 4.63. Based on approximately 800 burial plots (1.5m x 3m) in an acre, considering a developable area of approximately 2.68 acres (which applies a 30m buffer around the ponds and 10m non-burial around ditches), the site is suitable for 2,144 burials. The 10m non-burial buffer will be required around the ditches which may still be used for ashes and other memorials.
- 4.64. Based on an anticipated burial rate of 30 per annum, this site would have a lifespan of approximately 71 years.
- 4.65. The technical material includes an updated illustrative masterplan. To ensure the Plan is consistent with the evolving evidence base on this site, Plan 1 'Illustrative Concept Plan for BL2: Land East of Tadmarton Road' should be replaced by the updated, available at **Appendix 2**.

#### **Policy BL3: Connectivity**

- 4.66. We agree with principles set out in this policy. They will also accord with the principles at SLE4 of the adopted plan and policies CSD 22, CSD 23 and COM 15 of the submitted Local Plan
- 4.67. As already discussed in section 3 of these representations, the proposed allocation at Land East of Tadmarton Road, will accord with the principles set out within this policy.

#### **Policy BL4: Parking**

- 4.68. Oxfordshire County Council parking standards require the following parking provision, as set out at 'Table 4(b): Car Parking Standards for the rest of Oxfordshire (Villages & Hamlets)' of the Parking for New Developments document.

<b>Rural Oxfordshire</b>	<b>Parking Provision</b>
1-bedroom dwelling	Up to 1 space per dwelling to be provided within the development site
2-bedroom dwelling	Up to 2 space per dwelling to be provided within the development site
3-bedroom dwelling	Up to 2 space per dwelling to be provided within the development site
4-bedroom dwelling	Up to 2 space per dwelling to be provided within the development site

5-bedroom dwelling	Up to 3 space per dwelling to be provided within the development site
--------------------	---

4.69. Whilst the wording of Policy BL4 and the above table are slightly different; they are effective in ensuring that there is consistency between the two.

#### **Policy BL5: Housing Mix**

4.70. Table 5-9 of the HNA sets out the ideal mix of dwelling sizes to accommodate demographic change. This departs from the adopted housing mix, and the housing mix suggested within the submitted Cherwell Local Plan.

4.71. Neighbourhood Plans can depart from the Local Plan housing mix, should there be reasoned justification.

4.72. The HNA recommends (para 5.4.7) *“that future housing delivery focuses predominantly on 1 and 3 bedroom homes, with modest delivery of 2 bedroom options. These size categories tend variously to appeal to young people, starter families and some downsizing older households, and offer greater affordability than larger homes.”*

4.73. Additionally, there is (para 5.4.8) *“a particularly high proportion of 3 bedroom dwellings because they are so underrepresented in the current stock compared to wider averages and tend generally to be the most popular size across most age groups.”*

4.74. It is considered the proposed housing mix has been properly justified, based upon population projected household ages in 2040.

#### **Policy BL6: Adapting Homes to meet Demographic Change**

4.75. The HNA is clear that *“There are currently estimated to be around 374 individuals aged 75 or over in Bloxham, a number that is projected to rise to 608 by the end of the Neighbourhood Plan period in 2040.”* This equates to a 62.5% increase in people ages 75+. The 75+ population is projected to increase from 9% to 14% of the population of Bloxham between 2021 and 2040.

4.76. Despite this, currently only 5.4% of homes are bungalows, compared to 9% across Cherwell and England.

4.77. It is considered that the requirement for 20% bungalows is justified to ensure that the level of bungalow provision within Bloxham is brought closer to the requirement, when considering the demographic change that will be seen in Bloxham over the next 15 years.

#### **Policy BL9: General Design Guidance**

4.78. Policy BL9 of the Neighbourhood Plan has some tension with the submitted Cherwell Local Plan. The submitted Plan seeks to require the rural areas to have a minimum density of 35 dwellings per hectare, whilst Policy BL9 states that density should not exceed 30 dwellings per hectare.

4.79. The current masterplan can achieve approximately 125 dwellings, in the context of a developable area of 4.1 ha and a density of 30 dwellings per hectare.

4.80. It is recommended that there is consistency between Policy BL9 and Policy CSD25 of the submitted Cherwell Plan.

#### **Policy BL11: Key Streetscenes & Views**

4.81. Policy BL11 is a modified policy (of former BL12) and refines adopted Local Plan policies ESD13 and ESD15 by identifying on the Policies Map the key street scene and views.

4.82. The Policy states *“Development proposals located within or adjoining a designated Key Street scene or Key View, as shown on the Policies Map, must ensure that key features of the view can continue to be enjoyed and that any development has an acceptable impact in relation to the visual qualities of those views.”*

4.83. Key View 2, identified in the Draft Neighbourhood Plan, looks towards Hobb Hill. It is considered that the proposal will retain this view as no development is proposed on the higher areas of the site. The illustrative masterplan confirms that the development extent will be



restricted to the lower field with the inclusion of a woodland belt to screen the development.  
Views towards Hobb Hill will remain unaffected.

## 5. AECOM – HOUSING NEEDS ASSESSMENT (HNA)

### Quantity of housing to provide

- 5.1. The Aecom HNA, in relation to the quantity of housing required for Bloxham, needs to be updated.
- 5.2. It currently refers to the Framework (2023) and paragraphs 67 and 68. This should be updated to paragraphs 69 and 70.
- 5.3. Paragraph 2.5.2 of the HNA states: *“Cherwell has not fulfilled that requirement by providing Bloxham with a definitive or indicative figure to be accommodated within the NA by the end of the Neighbourhood Plan period – and instead may consider setting a target for Larger Villages as a whole (in line with the approach taken in the previous adopted Local Plan.”*
- 5.4. The Cherwell Local Plan was submitted on 5<sup>th</sup> August 2025.
- 5.5. Policy RUR 1 (Rural Areas Housing Strategy) within the submitted Cherwell Local Plan states that *“Development in the rural areas will be considered against the spatial strategy and Policy COM 1: District Wide Housing Distribution. 565 homes will be provided on sites allocated in neighbourhood plans, or this Local Plan in addition to the existing supply...”* It identifies Bloxham has providing a minimum of 75 homes.
- 5.6. Whilst a target is identified in the submitted Local Plan, this is not based upon the standard method, due to Cherwell utilising the transitional arrangements within the Framework. The Neighbourhood Plan states that *the Parish Council has used the new Standard Method as a starting point for deriving an indicative housing figure.*
- 5.7. The standard method for assessing housing need represents the most appropriate and robust approach for calculating Bloxham’s housing requirement, this methodology is consistent with national planning policy. The HNA should be updated to reflect this position.

## **Affordability and Affordable Housing**

- 5.8. It is noted that the HNA identifies that *“local households on average incomes are unable to access even entry-level homes unless they have the advantage of a very large deposit. The median house price would require an annual income more than twice the current average. Private renting is more affordable, but is generally only accessible to average and dual earning households – and even then, only for dwellings with 2 bedrooms or fewer.”* This is a challenge which the Neighbourhood Plan should seek to address.
- 5.9. The recognition of the importance of Affordable Housing in Cherwell’s adopted policy is fully supported, and the proposed 35% requirement for affordable homes on sites of 11 or more homes is welcomed as a vital mechanism for addressing local housing need. We particularly support the emphasis placed by AECOM on tailoring the tenure mix of Affordable Housing to reflect the specific circumstances of the Neighbourhood Plan Area.
- 5.10. Prioritising affordable rented homes, as recommended (70%), represents a pragmatic response to the needs of lower-income households who are least able to access the open market. At the same time, including a meaningful proportion of affordable home ownership options (30%) ensures that those on moderate incomes, who are currently priced out of the market, are not overlooked. This balanced approach aligns well with emerging Cherwell policy and offers an effective strategy for delivering genuinely mixed and inclusive communities.
- 5.11. By adopting this tenure mix, future development can play a constructive role in supporting housing affordability and social sustainability across the Neighbourhood Plan Area, while still being responsive to the scale and nature of identified local need.

## **Type and Tenure**

- 5.12. My clients welcome the detailed analysis of dwelling size needs and the model's effort to align future housing delivery with anticipated demographic trends and current stock imbalances. The conclusion that a greater emphasis should be placed on smaller and mid-sized homes is both logical and appropriate, particularly given the growing demand from younger households, first-time buyers, and downsizing older residents.

- 5.13. My clients also appreciate the recognition of the model's limitations, particularly in relation to the absence of 1 and 4+ bedroom homes in the initial outputs.
- 5.14. The proposed indicative mix, based on Aecom's professional judgement— with 30% 1-2 bedroom homes, 60% 3 bedroom homes, and 10% 4+ bedroom homes — seems reasonable and appropriate. It strikes an appropriate balance between meeting demographic needs, improving affordability, and offering a diverse range of housing choices that can accommodate households at all life stages.

## 6. APPENDIX A: SITE ASSESSMENT & SELECTION

- 6.1. We note from paragraph 6 that the Parish Council have been working with Aecom to provide further information, such as the 'Community Benefits List (2023) and correcting assumptions which were incorrect.
- 6.2. We also note that priorities have changes in terms of the benefits which the Parish Council seeks to achieve as part of its Neighbourhood Plan.
- 6.3. Paragraph 9 summarises the additional information which has been provides in relation to Site 1 (Land East of Tadmarton Road). This is:

*Site 1 - importantly, two adverse effects it identified can be corrected: the land interest has committed to providing land for the expansion of the school so there will be no prejudicing of that potential, and to connecting the site with the adjoining PRow, which will mean all the developable land will lie within a safe and convenient 400m walking distance of the Village centre. The land interest has also offered land for a burial ground and or a potential future community use of the existing barn (once its established agricultural use has ended), as well as the creation of a new public vantage point at Hobb Hill with significant woodland and other planting to manage the sensitive landscape transition and to re-route the overhead power cables.*

- 6.4. Our clients agree with above clarifications in relation to the Land East of Tadmarton Road.
- 6.5. The approach to positively plan for future housing growth in Bloxham over the plan period is welcomed.
- 6.6. The standard method for assessing housing need represents the most appropriate and robust approach for calculating Bloxham's housing requirement, this methodology is consistent with national planning policy.
- 6.7. The identified figure of 21.8 homes per year is considered appropriate. Paragraph 14 of Appendix A states that "For the ten year plan period from April 2024 (from when CDC is

calculating housing supply) to March 2034 the NP should provide for approx. 218 homes.” This is inconsistent with other plan period suggested with the plan (up to 2037 and 2040 in separate locations).

6.8. It is considered should be 2025 - 2042 (see comments above in relation to the extent of the plan period).

6.9. In this context, it is recommended that the 21.8 homes per year is extended across the plan period which would see a total requirement of 370 homes (21.8 homes per year x 17-year period).

6.10. Paragraphs 21 and 22 concludes:

*21. It was therefore concluded that only Sites 1 and 5 could be considered reasonable alternatives and they were assessed as such by the separate SEA, also carried out by AECOM as part of the wider assessment of the draft policies. The SEA indicated both sites have the potential for positive and adverse effects that could be mitigated through allocation policy requirements.*

*22. The Parish Council chose to allocate Site 1 as it would directly deliver the most important benefit in the only plausible location and deliver other community benefits.*

6.11. We consider that Site 1 is a better located site to provide much needed local benefits to Bloxham. As per the below comparison summary, site 1 is clearly more sustainable to existing facilities in the village and would be more accessible for the majority of the population.

**Table 2. Comparison of Sites 1 and 5 (taken from site selection paper)**

	SITES	
	Site 1 Land at Tadmarton Road	Site 5 Land North and South of Milton Road
	<b>Site Credentials</b>	
<b>Size</b>	8.39	17.6
<b>Developable Area</b>	3.58	4.9
<b>Possible Capacity</b>	100	74
<b>Site Type</b>	Greenfield	Greenfield
	<b>Access to Facilities</b>	
<b>Distance to Convenience Store (KM)</b>	0.6	1.5
<b>Distance to Pub (KM)</b>	0.5	1.2
<b>Distance to Surgery (KM)</b>	0.5	1.1
<b>Distance to Primary School (KM)</b>	0.1	1.6
<b>Distance to Secondary School (KM)</b>	1.5	2.3
<b>Distance to Sports Centre (KM)</b>	0.9	1.6

## 7. STRATEGIC ENVIRONMENTAL ASSESSMENT

7.1. AECOM produced a Site Options and Assessment Report for Bloxham (Appendix A of the NP). Of the 14 sites that were assessed through the report only 10 were considered potentially appropriate for development. Of these ten sites, only two were considered to be ‘reasonable’ for the purposes of the SEA. The two options are:

- **Site 1** – Approximately 125 homes, land for the expansion of Bloxham Church of England Primary School, land for a burial ground, and the conversion of a barn for community use (e.g. a library).
- **Site 5** – Approximately 230 homes, land for a burial ground, allotments / orchard, and a new community facility (e.g. a library)

7.2. Table 5.2 of the SEA sets out the ‘Summary of Findings’ of the Assessment of Reasonable Alternatives. Table 5.2 is inserted below:

SEA topic		Option 1 – Site 1	Option 2 – Site 5
Air quality	Significant effects?	No	No
	Rank	1	2
Biodiversity and geodiversity	Significant effects?	No	No
	Rank	1	2
Climate change and flood risk	Significant effects?	No	No
	Rank	1	2
Community wellbeing	Significant effects?	<b>Yes – positive</b>	<b>Yes – positive</b>
	Rank	1	2
Historic environment	Significant effects?	<b>Uncertain</b>	<b>Yes – negative</b>
	Rank	1	2
Land, soil, and water resources	Significant effects?	No	<b>Yes – negative</b>
	Rank	1	2
Landscape	Significant effects?	<b>Yes – negative</b>	<b>Yes – negative</b>
	Rank	1	2
Transportation	Significant effects?	No	No
	Rank	1	2

7.3. Comments are provided to each SEA topic below:

### Air Quality

- 7.4. The Air Quality conclusions in relation to site 1 are agreed. The proposals will benefit from local facilities and public transport links within walking distance. It is agreed that **no significant effects** are considered likely.

### Biodiversity and geodiversity

- 7.5. The PEA confirms that the site is not subject to any designation.
- 7.6. The development area focuses on the three southern fields (as per the illustrative masterplan).
- 7.7. The PEA concludes that The site contains mature oak trees, seasonal drainage ponds, mature hedgerows and areas of willow scrub which are of good quality and could be of value to local wildlife populations. The remaining habitats are common and widespread and have low ecological value. No protected or notable plant species were recorded during the survey.
- 7.8. The proposed development will primarily focus on grazed grassland, resulting in the loss of grazed modified grassland. However, the addition of SUDs features, wildflower areas, new hedgerows and other enhancement areas (e.g. the cemetery) could off-set this loss.
- 7.9. The richer habitats on site (willow scrub, native hedgerows with trees) will be retained. No direct impacts to any notable habitats will occur as a result of the proposed development.
- 7.10. Areas of modified grassland will be removed during construction. Although these habitats are not particularly rich for invertebrates, they could result in the fragmentation of the local landscape. It is recommended that no further surveys are required.
- 7.11. No trees with significant roosting value will be felled due to the development. As such no significant impacts are anticipated. The proposed development will result in the loss of modified grassland but given their low value and the presence of more extensive areas of foraging and commuting habitat in the locality, this is likely to be inconsequential for bats. The

habitats on site with a high value for bats (e.g. the hedge lines with mature trees) will be retained.

- 7.12. No evidence of nesting birds was identified on or within the existing buildings on site.
- 7.13. Modified grassland will be removed during construction. The loss of such habitats is likely to be inconsequential to local reptile populations owing to their low value and the presence of more extensive habitat locally.
- 7.14. Although no ponds are being lost due to the development, it is assessed that the proposed works are highly likely to cause impacts to great crested newts. It is likely that a district level licence will need to be obtained to permit the development and subsequent disturbance of newt habitat. To inform this licence, environmental DNA (eDNA) surveys will be required of the ponds (P1, P3 – P8) within 500m of the site (where accessible) to determine the presence or absence of great crested newts.
- 7.15. No badger setts were noted on site or within a 30m radius of the site. Further, no evidence of foraging badgers was noted within the development area.
- 7.16. It is agreed that **no significant effects** are considered likely.

#### Climate change and flood risk

- 7.17. Clearly there will be an increase in overall greenhouse gas (GHG) emissions owing to construction traffic and the operation of new homes. This is unavoidable with new housing developments.
- 7.18. However, as above, the proposals will benefit from local facilities and public transport links within walking distance which will assist in reducing the impact from the operation of the new homes at Site 1.
- 7.19. The Flood Risk Assessment confirms that the site is located entirely within Flood Zone 1. It also confirms that the site is at 'very low risk of surface water flooding' and 'very low risk of ground water flooding'.

7.20. A drainage strategy has been developed and is submitted with our representations to the Neighbourhood Plan (**Appendix 6**). The location and details of the SuDS can be seen drainage layouts. It is proposed to drainage the site using two attenuation ponds and infiltration trench running along the north of the development extent.

7.21. The drainage calculations demonstrate that no flooding occurs for the 1 in 30 storm events, and any flooding for a 1 in 100 year + 40% climate change event can be safely contained on site.

7.22. With regards to Foul Drainage, proposed foul flows are to discharge to a pumping station prior to connecting into the existing Thames Water network.

7.23. It is agreed that **no significant effects** are considered likely.

#### Community wellbeing

7.24. Site 1 would contribute approximately 125 dwellings to the housing need of Bloxham (and Cherwell). Additionally, Site 1 provide the following community benefits:

- Creation of a viewing platform overlooking Bloxham from Hobb Hill via a new footpath on Hobb Hill. This is a unique benefit that only this site can offer;
- A new area of public open space in the eastern extent of the Site would be created;
- Land safeguarded for the future expansion of the adjacent Bloxham Church of England Primary School;
- Existing agricultural safeguarded for conversion to a community use;
- Provision of bungalows for elderly residents;
- Proposed Permissive Footpath on land controlled by the Facon Family to encourage public access onto Hobb Hill;
- Proposed pedestrian and cycle access with Courtington Lane and wider village particularly for elderly walkers and users of mobility scooters; and,
- Walkable access to local facilities and public transport links in Bloxham.

7.25. It is agreed that Site 1 would have **significant positive effects with regard to community wellbeing.**

#### Historic environment

7.26. It is acknowledged that a cluster of listed buildings (predominantly grade II) in the centre of the village is located approximately 150m from the site. However, as stated, there is existing development between Site 1 and the cluster of listed buildings.

7.27. A Heritage Impact Assessment has been submitted with our representations to the Neighbourhood Plan (**Appendix 10**). The Heritage Impact Assessment concludes that *“Whilst there is the potential for harm, in policy terms, to the significance of the heritage assets it should be possible to mitigate this through ensuring that heritage constraints are key consideration in the design and planning of any future development. This could include locating any built form to the lower, southern part of the Land, restricting heights of the built form and looking for opportunities to better reveal the significance of heritage assets through creating and interpreting views.”*

7.28. This feedback has been taken on board, with development extent being located to the lowest part of the site, adjacent existing development on Courtington Lane.

7.29. The report concludes that heritage considerations would need to be considered, but would not preclude the ability to deliver a legislative and policy compliant development of the form set out in the policy wording. It is considered that Site 1 would have **no significant effects.**

#### Land, soil, and water resources

7.30. Site 1 is not best and most versatile (BMV) agricultural land (Grades 1, 2, or 3a).

7.31. As set out at paragraph 5.42, brownfield sites are limited in the neighbourhood area, and in this respect the loss of greenfield land is largely unavoidable if the Bloxham NP is to meet housing needs.

7.32. Site 1 does not conflict with any mineral safeguarding areas or consultation areas.

7.33. It is agreed that **no significant effects** are considered likely.

### Landscape

7.34. As mentioned above, paragraph 5.42 of the SEA acknowledges that brownfield sites are limited in the neighbourhood area, and in this respect the loss of greenfield land is largely unavoidable if the Bloxham NP is to meet housing needs.

7.35. The SEA states (paragraph 5.49) that *“The land slopes upwards away from the settlement towards a ridge line and therefore development in this location has the potential to impact views to/from the village to the north. Development of this site would ultimately extend the settlement into the open countryside to the northwest, and due to its size (8.4ha) and position relative to the existing built-up area, it has the potential to significantly change the size and character of the village.”*

7.36. The 12.36 ha referred to includes land which will not be development. The extent of development sits on an area of land which extends 4.1 ha.

7.37. It is acknowledged that the land slopes upwards away from the settlement towards a ridge line. However, no development is proposed on the land which slopes up. The proposed build extent can be seen on the Illustrative Masterplan (**Appendix 2**).

7.38. A Landscape and Visual Appraisal has been submitted with our representations to the Neighbourhood Plan (**Appendix 8**). The Landscape and Visual Technical Note confirms the Site is not subject to any qualitative landscape designations. It is considered that the Site has the capacity to accommodate a sensitively designed residential development, provided that a high quality, landscape-led approach to the design development is adopted that preserves the sensitive areas identified in the Bloxham Neighbourhood Plan.

7.39. The LVTN concludes that development *“could be accommodated without resulting in significant adverse effects on the localised or wider visual amenity and that the integrity of the receiving landscape character would be preserved, with proposed landscape features contributing positively to the identified landscape character of the area.”*

7.40. In this context, it is considered that Site 1 would have **no significant effects**.

#### Transportation

7.41. Site 1 will be access via Tadmarton Lane. This is considered appropriate for access to the whole site. It is agreed that a footpath connecting the site with the current extent of the footpath on Tadmarton Road could be provided as part of the development.

7.42. An existing gated access to the site from Courtington Lane is proposed to be used as a pedestrian and cycle access. This access could also form an emergency access, if required.

7.43. Public Right of Way (PRoW) – public footpath 136/6/20 – runs to the east of the site and would not be adversely impacted as a result of developing Site 1. The footpath will unrestricted (due to removal of land from agricultural use) and will be connected to the permissible footpath, which will be included as part of the development.

7.44. A Transport Statement has been submitted with our representations to the Neighbourhood Plan (**Appendix 4**). The Transport Technical Note confirms that the site can be access appropriately. Vehicular access will be taken from a re-aligned access from Tadmarton Lane. The access will take the form of a simple priority junction with a 5.5-metre-wide carriageway and 6-metre junction radii. Visibility splays of 2.4m x 43m can be achieved to the east and 2.4m x 160m to the west.

7.45. A 2-metre-wide footway is proposed on the southeastern side of the new access road, together with a pedestrian crossing incorporating dropped kerbs and tactile paving on Tadmarton Road. The proposed footway will enable connection into the existing footway network on the southern side of Tadmarton Road, which provides links southeast towards Bloxham.

7.46. The existing gated access from Courtington Lane to the site which runs through the middle of two existing dwellings is proposed to be used as a pedestrian and cycle access to the site. A 3.7m wide route can be achieved using the existing access and retained dropped kerb, with 4.5m available between boundary fences. This provides sufficient width for emergency vehicle



access. It is proposed to install removable bollard so that emergency vehicles could access the site, should Tadmarton Road be blocked. This would be the only vehicular use of this access.

7.47. Personal Injury Accident data Confirms that two accidents have occurred in the last 5 years. The recorded accidents do not suggest that there is a safety issue with the operation of the highway network and are likely due to human error.

7.48. The proposed development would equate to 53-56 two-way peak hour vehicle movements. It is expected that the majority of traffic would route south on Tadmarton Road and continue south towards the A44 or north towards Banbury and the M40.

7.49. In terms of multi-modal movements, comparable surveys within the TRICS database estimate that there would be 143 daily two-way pedestrian movements (07:00-19:00), 21 two-way daily cyclist movements and 31 daily two-way public transport movements.

7.50. The additional vehicular traffic would be a modest increase and would not be expected to materially impact on the safety or operation of the local road network.

7.51. It is agreed that no significant effects are considered likely.

7.52. Based upon the above, we would suggest the following amendments are made to the Summary of Findings table:

SEA topic		Option 1 – Site 1	Option 2 – Site 5
Air quality	Significant effects?	No	No
	Rank	1	2
Biodiversity and geodiversity	Significant effects?	No	No
	Rank	1	2
Climate change and flood risk	Significant effects?	No	No
	Rank	1	2
Community wellbeing	Significant effects?	<b>Yes – positive</b>	<b>Yes – positive</b>
	Rank	1	2
Historic environment	Significant effects?	<b>Uncertain No</b>	<b>Yes – negative</b>
	Rank	1	2
Land, soil, and water resources	Significant effects?	No	<b>Yes – negative</b>
	Rank	1	2
Landscape	Significant effects?	<b>Yes – negative No</b>	<b>Yes – negative</b>
	Rank	1	2
Transportation	Significant effects?	No	No
	Rank	1	2

## 8. CONCLUSION

8.1. These representations are made to the Bloxham Community Neighbourhood Plan 2025 – 2040 Consultation, on behalf of Facon Family, in relation to land east of Tadmarton Road ('Painters Farm'), Bloxham.

8.2. Land east of Tadmarton Road ('Painters Farm'), Bloxham can accommodate approximately 125 dwellings. In addition to the provision of housing in a sustainable location, growth at this site can provide multiple benefits to local community of Bloxham.

- Open views from Hobb Hill of the Grade I listed Church of St Mary and the wider village setting can be enhanced with the creation of a viewpoint and picnic area) overlooking Bloxham from Hobb Hill via a new footpath on Hobb Hill. This is a unique benefit that only this site can offer.
- A new area of public open space in the eastern extent of the Site will be created, this would respect the open character of this area (mindful of Policy COM 13 Settlement Gaps), complemented by linear areas of public open space running along the development edges of the Site to maximise connectivity.
- Land to be reserved for the future expansion of the adjacent Bloxham Church of England Primary School (including Car Park)
- Provision of bungalows for elderly residents.
- Proposed pedestrian and cycle access with Courtington Lane and wider village particularly for elderly walkers and users of mobility scooters.
- Potential for provision of Allotments.
- Proposed Permissive Footpath on land controlled by the Facon Family to encourage public access onto Hobb Hill.
- Indicative areas for new Sustainable Urban Drainage System (SUDS) along with renovation and improvements of existing retention ponds.
- Land to be safeguarded for a Cemetery.

8.3. It is considered that the proposed site responds to the draft wording of Policy BL2. The submitted evidence base supports the allocation of this site for development within the Bloxham Neighbourhood Plan.

- 8.4. For the reasons set out within these representations, and accompanying evidence base, land east of Tadmarton Road ('Painters Farm') is the most appropriate site to be allocated in the Bloxham Neighbourhood Plan for residential development.

Submitted by: Anonymous user

Submitted time: Sep 15, 2025, 3:04:55 PM

## Contact details

First name

[REDACTED]

Last name

[REDACTED]

Are you responding as an individual or as a representative of a wider group?

**Responding on behalf of a group**

Please name the group here

**Deeley Homes**

Email address

[REDACTED]

Postal address

**Deeley Homes, George House, Herald Avenue, Coventry, CV5 6UB**

Do you consent to your contact details being passed to Cherwell District Council (CDC)?

**Yes, I agree**

## Policy BL1: Spatial Plan for Bloxham

Do you agree with the inclusion of Policy BL1: Spatial Plan for Bloxham

**Yes**

Do you have any comments about Policy BL1: Spatial Plan for Bloxham?

**We're writing on behalf of Deeley Homes, whilst we are supportive of this policy given the inclusion of our development site North of Ells Lane we suggest that the Neighbourhood plan updates the settlement boundary to reflect the committed development sites.**

## Policy BL2: Land East of Tadmarton Road ('Painters Farm')

Do you have any comments about Policy BL2: Land East of Tadmarton Road ('Painters Farm')

**No comment.**

## Policy BL3: Connectivity

Do you have any comments about Policy BL3: Connectivity

**We are supportive of the promotion to improve low carbon connectivity. Our development site North of Ells Lane contributes to this objective by providing each dwelling with secure cycle storage encouraging easy storage and use of bicycles. In addition, the site has been carefully designed to maximise pedestrian access to village facilities, and links to the wider footpath network to promote safe and accessible travel on foot.**

Policy BL4: Parking

Do you agree with the inclusion of Policy BL4: Parking

**Yes**

Do you have any comments about Policy BL4: Parking

**We are supportive of the parking provisions put in place. Our development site North of Ells Lane considers this, providing all plots with a minimum of two spaces (excluding one beds) and visitor parking. Preventing additional inappropriate parking on Ells Lane, which presents a major impediment to the safe flow of both traffic and pedestrians.**

Policy BL5: Housing Mix

Do you agree with the inclusion of Policy BL5: Housing Mix

**No**

Do you have any comments about Policy BL5: Housing Mix

**We would comment that the required number of house types is very inflexible and does not reflect market evidence. In addition, whilst we are supportive in principle of the First Homes initiative at a 40% discount to market, they will be financially unviable. In our view a lower discount needs to be considered to ensure that a sensible number of these properties can be delivered.**

Policy BL6: Adapting Homes to meet Demographic Change

Do you agree with the inclusion of Policy BL6: Adapting Homes to meet Demographic Change

**No**

Do you have any comments about Policy BL6: Adapting Homes to meet Demographic Change

**We would like to comment on the need to deliver a minimum of 20% bungalows on site. We would suggest that the Neighbourhood plan needs to consider a minimum number of units to trigger this requirement. Smaller sites like ours North of Ells Lane typically face layout constraints which are made more challenging by the increased plot sizes required by single storey properties.**

Policy BL7: Residential Amenity

Do you have any comments about Policy BL7: Residential Amenity

**No comment.**

Policy BL8: Local Infrastructure

Do you have any comments about Policy BL8: Local Infrastructure

**No comment.**

Do you agree with the inclusion of Policy BL9: General Design Guidance

**No**

Do you have any comments about Policy BL9: General Design Guidance

**We would like to comment on the guidance to use materials in keeping with the distinctive character of Bloxham including the use of local bricks and ironstone. We agree that it is important to retain the character of the area. However, we would ask that the Neighbourhood plan reconsiders the level of this requirement particularly for elevations which are not fully visible or less prominent. We consider that there needs to be a balance which should ensure build costs are viable to ensure the dwellings are affordable for locals.**

Policy BL10: Design in the Conservation Area

Do you have any comments about Policy BL10: Design in the Conservation Area

**No comment.**

Policy BL11: Key Streetscenes & Views

Do you have any comments about Policy BL11: Key Streetscenes & Views

**No comment.**

Policy BL12: Employment Land

Do you have any comments about Policy BL12: Employment Land

**No comment.**

Policy BL13: Village Centre

Do you have any comments about Policy BL13: Village Centre

**No comment.**

Policy BL14: Broadband & Mobile Communications

Do you have any comments about Policy BL14: Broadband & Mobile Communications

**No comment.**

Policy BL15: Local Green Spaces & Other Amenity Spaces

Do you have any comments about Policy BL15: Local Green Spaces & Other Amenity Spaces

**No comment.**

Finally, do you have any comments about the Modified Bloxham Neighbourhood Plan as a whole?

**No comment.**

15 September 2025  
**Delivered by email**

Ref: AINA3020

Dear Sir/Madam

**REPRESENTATIONS ON BEHALF OF AINSCOUGH STRATEGIC LAND, MR B J HEDGES, MR G L & MS A WOODARD AND MS E A WYATT**

**BLOXHAM NEIGHBOURHOOD PLAN CONSULTATION (REGULATION 14) - LAND EAST OF BARFORD ROAD, BLOXHAM**

We write on behalf of Ainscough Strategic Land Limited (ASL), Mr B J Hedges, Mr G L & Ms A Woodard and Ms E A Wyatt, in relation to the Regulation 14 consultation which is currently taking place on the Bloxham Neighbourhood Plan (BNP).

Our clients have an interest in a site located east of Barford Road, Bloxham ("the Site" - see Site Location Plan at **Appendix 1**). A planning application for up to 114 homes is currently being determined by Cherwell District Council (application ref. 25/01009/OUT).

The Regulation 14 Version (as presently drafted) fails to meet to the basic conditions under paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004). In particular:

1. The draft Plan's policies (and supporting text) do not have regard to national policies and advice set out in the PPG (basic condition 8(2)(a));
2. The draft Plan would not contribute to the achievement of sustainable development (basic condition 8(2)(d)); and
3. The draft Plan's policies would not be in general conformity with the strategic policies contained in the development plan for the area of the authority (basic condition 8(2)(e)).

[REDACTED]  
[REDACTED]  
[REDACTED]

[REDACTED]

Fundamentally, the draft Plan has not been prepared in a way required by national policy and guidance. The Planning Practice Guidance<sup>1</sup> confirms that where a neighbourhood plan is brought forward before an up-to-date local plan is in place the qualifying body and the local planning authority should work together so that complementary neighbourhood and local plan policies are produced. It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan, including housing supply policies. There is no evidence of this exercise having been undertaken with the LPA.

In short, the draft Regulation 14 version plan is (1) inconsistent with emerging policy, (2) does not allocate sites to meet the full housing needs of the area (across an appropriate plan period, consistent with the emerging plan) and (3) in all the circumstances, does not contribute to the achievement of sustainable development.

### 1) Plan period

The draft Plan references different plan periods throughout the consultation document, in a fashion that is inconsistent with national policy (e.g. NPPF 16 and the requirement for clarity and precision):

- Title page plan period stated: 2025–2040
- Policy BL1: Spatial Plan for Bloxham Plan period stated: 2024-2037
- Appendix A: ‘Site Assessment & Selection’ plan period stated: 2024-2034

The emerging Cherwell District Council Local Plan period is 2020 – 2042, i.e. a period intended to ensure that 15 years remain from the point of adoption in accordance with NPPF 22.

The proposed plan period for the neighbourhood plan is very unclear. To ensure consistency with the emerging Local Plan, we consider the Plan’s period must align with the Local Plan end date of 2042. Housing needs across that plan period should be addressed by the neighbourhood plan. As we shall observe below, confusion as to the plan period has generated a fundamental flaw in the approach to the requirement, and thereafter allocations.

### 2) Housing Requirement

Draft Policy BL1 provides for approximately 285 homes to be delivered in the plan period 2024 – 2037. The supporting text to this policy confirms that:

*“As explained in Appendix A, the Parish Council has used the new Standard Method as a starting point for deriving an indicative housing figure for this policy which presently equates to 21.8 homes per year. It considers this a firm basis for planning for housing growth for the next decade or more”.*

This figure is further confirmed at BNP Appendix A: Site Assessment & Selection, paragraph 13. Paragraph 14, then states that a ten year plan period of 2024 – 2034 would result in the need for approximately 218 homes which, with 160 homes already consented, would require land to be allocated for at least 58 homes. It further confirms that such allocations would need to be made for the District Council to be confident that paragraph 14 of the NPPF would be engaged<sup>2</sup>.

<sup>1</sup> PPG Ref. Paragraph: 009 Reference ID: 41-009-20190509

<sup>2</sup> Paragraph 14b sets out a requirement for neighbourhood plans to meet its identified housing requirement. This must be calculated in accordance with later NPPF paragraphs 69 and 70 and the PPG guidance

Paragraph 17 then states additional homes identified through the site allocation process allows the BNP period to be extended to 13 years i.e. to 2037, which is the period used in draft Policy BL1.

However, the actual Plan period for the Neighbourhood Plan is 2025 - 2040 as stated on the title page of the Plan. Using the standard method requirement across this entire plan periods would equate to a need for 327 homes (15 x 21.8 homes) or, if a base date of 2024 we used (as per Policy BL1), a requirement of 349 homes.

If the Plan period is extended to 2042, which is the only appropriate course of action to ensure alignment with the emerging Local Plan, then the housing requirement would equate to 371 homes in the period 2025 to 2042 (17 x 21.8) or 392 homes, if a base date of 2024 were used (as per Policy BL1).

Policy BL1: Spatial Plan for Bloxham therefore cannot proceed to examination without a full review and update of the evidence base, plan content and, critically, allocation, to match the increased housing requirement of a minimum of 371 homes (2025-2042), given that the plan period must be extended to 2042 in line with the emerging Local Plan. This would increase to 392 homes, if a base date of 2024 we used (as per Policy BL1).

As a result, the Parish Council as qualifying body must now consider further sites for allocation to meet this increased need, to continue planning positively as the housing figures are minimum requirements.

The above view is supported by the evidence in the AECOM Bloxham Housing Needs Assessment (December 2024) which identifies, at paragraph 1.2.4, that average house prices in Bloxham are around 30% more expensive than those of Cherwell as a whole and, at paragraph 1.2.12 that there is estimated to be an annual need of for 6.6 affordable home ownership dwellings per annum in Bloxham, equating to a total of 99 over the Neighbourhood Plan period to 2040. Paragraph 1.2.14 further confirms that rented housing would help diversify the tenure offering in Bloxham and support lower earning households and the delivery of affordable home ownership would help to meet demand in a context where home ownership through the open market is "very unaffordable". Meeting full housing needs is, therefore, imperative to help address the local affordable need requirements of Bloxham, even before the wider acute affordable housing needs of Cherwell district as a whole are considered.

The error in respect to the plan period is so fundamental that the plan cannot proceed to submission under Regulation 15 and thereafter examination.

### **3) Strategic Environmental Assessment (SEA)**

There have been fundamental methodological errors in the SEA, such that the making of the plan would further breach basic condition 8(2)(f), and in all the circumstances, would breach basic conditions 8(2)(a) and (d).

The SEA considers the likely effects of the emerging BNP, noting the BNP seeks to manage growth of Bloxham. With regard to the consideration of housing sites specifically, 14 sites were identified through CDC's HELAA (2024). Of these, 10 were given an amber rating and so considered '*potentially appropriate for development*'. Of these, only two sites were deemed '*reasonable*' for the purposes of the SEA. This is on the basis that the Parish Council deemed these could deliver the indicative housing need of 75 homes as recognised in CDC's emerging Local Plan, and deliver the community benefits identified by the Parish Council.

This 'preferred approach' is set out at Section 6 of the report, which sets out that the PC only considered sites that could deliver on-site community benefits, hence discounting sites that cannot deliver on-site infrastructure provision.

This approach is a completely illogical reason for discounting sustainable housing sites when financial contributions are available to secure necessary associated infrastructure through the appropriate mechanism, either through planning obligations, or if adopted by a Local Planning Authority, the Community Infrastructure Levy (CIL). It has no regard to national policy, guidance or basic planning practice. It has no basis within the SEA Regulations and arbitrarily disregards what are plainly reasonable alternatives, without any lawful basis.

The PPG states *"Planning obligations are legal obligations entered into to mitigate the impacts of a development proposal."*

Regarding their use by the local planning authority; the PPG details:

*"Planning obligations assist in mitigating the impact of unacceptable development to make it acceptable in planning terms."*

Our clients' Site on 'Land East of Barford Road, Bloxham' is assessed under site reference 'Site 14'. The findings in relation to the site are:

*"A planning application for 100 homes has been submitted. It makes provision for attenuation land to address flood risk and some boundary landscaping. However, it does not make provision for any of the identified community benefits. Due to this, the site is not taken forward for the purposes of the SEA."*

The Site has therefore been discounted for the sole reason of the lack of on-site infrastructure provision.

Statutory consultees on ASL's planning application are currently seeking the following planning obligations should planning permission be granted (N.B. these are as set out in the consultation responses and are not final):

- Primary and nursery education
- Special education
- Household waste recycling centres

As such, through ongoing discussions with the local planning authority (LPA) on an appropriate package of S106 obligations, it is clear that the development will address infrastructure needs and lead to sustainable development. As such, this will not be reason for withholding permission, no should it be a reason for discounting the Site as an appropriate allocation against relevant sustainability criteria, particularly given the need to identify further housing site.

The SEA is also fundamentally flawed on the basis that sites were assessed and taken forward or discounted based on the misunderstanding that there is an indicative housing need of only 75 homes when, as we have set out earlier, the actual housing requirement over a consistent plan period aligned to the emerging Local Plan is much higher. A proper consideration of all sites and their ability to meet full housing needs may have led to different SEA conclusions.

#### 4) Additional Allocation Required: Land East of Barford Road, Bloxham

As part of any new site assessment exercise (and accompanying revised SEA), Land East of Barford Road should be considered again and allocated for development.

The Site Location Plan (**Appendix 1**) identifies two land parcels located south east of the village. The potential developable area comprises the two land parcels immediately adjoining Barford Road (5.5ha) to the west and Bloxham Mill Business Centre to the north. Existing residential development is situated to the west and north west beyond Barford Road.

As set out in the live planning application (25/01009/OUT), the Site has the capacity to deliver approximately 114 homes<sup>3</sup>, including 35% affordable (equating to 40 homes), with land available for green infrastructure, such as biodiversity enhancements to achieve a net gain, SuDS drainage features and a Locally Equipped Area of Play (LEAP). An Illustrative Masterplan, whilst not sought for approval in the planning application, helps illustrate how the homes and associated infrastructure can be appropriately accommodated on the Site.

The homes are proposed to be a maximum of 2 storeys in height across the Site, to be secured by an approval of the Parameters Plan on any planning permission.

The Promotion Site is noticeably unconstrained by environmental designations as summarised below and illustrated by the Cherwell Local Plan Policies Map extract at **Appendix 2**:

- **No Heritage constraints** – The Promotion Site is set c.560m away from Bloxham Conservation Area, with no other heritage assets on or near the site.

The Conservation Officer at CDC has provided a consultation response on the planning application noting that *“in heritage terms the proposal in its outline form and from the indicative plans is not considered to result in unacceptable harm to the significance of any heritage assets.”*

- **No Landscape/Open Space constraints** – The site does not fall within or near the Green Belt or the Cotswold AONB (situated c.10km west of the site).
- **No ecological constraints** – No national designations (SSSI/SAC/SPAs) would be affected by development at this location. The site is set away from the Local Nature Reserve located west of Bloxham. The site does not fall within the Conservation Target Area (CTA) to the east of Bloxham which is safeguarded for ecological enhancements. The Promotion Site presents opportunities for ecological enhancements which could align with the CTA and deliver biodiversity net gains.
- **No Flood Risk concerns** – Falls wholly within Flood Zone 1, land at least risk from flooding.

The LLFA have no objection to the planning application, subject to planning conditions securing a detailed drainage scheme for the final layout.

- **Vehicular Access** – Access with the requisite visibility splays (ensuring safety and no conflict with the Business Centre entrance) is achievable along the western boundary onto Barford Road, as demonstrated in the Transport Assessment submitted with the live planning application. A Stage

---

<sup>3</sup> Based on amended plans submitted to Cherwell District Council on 11.09.2025

1 Road Safety Audit is being undertaken for the vehicular access and will be submitted pursuant to the planning application.

- **Access on Foot/by Bicycle** - An enhanced public right of way is situated on adjacent land to the west, within an *'Important Amenity Green Space'* – this presents a benefit to any future development, providing future residents with a safe, attractive and convenient walking route to the village services and facilities which are located within a 10 to 20 minute walk from the site. There will be further opportunity to enhance foot/cycle/bus provision through any development proposals.

In addition to the above, statutory consultees have no objection in relation to the following:

- Noise
- Air Quality
- Odour
- Lighting
- Contaminated land (subject to relevant planning conditions)
- Archaeology (subject to relevant planning conditions)
- Waste management (subject to relevant planning conditions)
- Strategic Housing
- Planning Policy

The site is capable of delivering a mix of open market and affordable housing reflective of current and future demographic and market trends and the needs of different groups in the community. Indeed, flowing from our earlier commentary on affordable housing need in Bloxham, it is notable that the Council's Strategy Housing Need support the proposals, stating that:

*"Strategic Housing support this proposal because it has the potential to provide a range of sizes of affordable housing which is extremely welcome in addressing identified needs."*

New residential development will provide a landscape framework comprising new open space provision for formal and informal play and recreation providing opportunities embedded within green infrastructure. A housing development on the site would include permeable and legible pedestrian and cycle routes, linking through to the existing built development of the village and the surrounding countryside.

We consider Land East of Barford Road in Bloxham to be sustainably located, well serviced and an accessible site which is suitable, available and achievable for development. By virtue of the Promotion Site being smaller scale with no technical constraints, it is not hampered by the need for strategic infrastructure to be in place to enable its delivery, however, appropriate contributions to education and other obligations as may be deemed necessary by the LPA will be secured, ensuring adequate provision of local infrastructure and sustainable development. Therefore, the site is deliverable within a five year timeframe and its allocation would ensure an early and continual stream of housing to meet the district's annual requirements while the larger strategic sites take time to unlock.

## 5) Summary

The Regulation 14 version of the draft Plan does not meet the basic conditions and is not ready to proceed to examination.

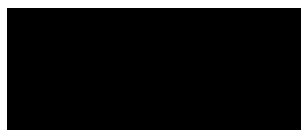
Significant changes to the draft plan are necessary in order to meet the basic conditions for the BNP to proceed to referendum. Inconsistencies in the plan period must be addressed, and allocations to meet full housing needs over the appropriate plan period (2025 to 2042) should be identified.

Housing development at the Promotion Site will make a positive contribution to the sustainable growth of the district as a whole and support the vitality of the rural community of Bloxham (in accordance with paragraph 83 of the NPPF).

This is especially relevant in a context where Cherwell cannot demonstrate a five year housing supply, with notable delays to the pace of delivery on adopted site allocations.

We welcome the opportunity to engage further with the Parish Council. Should the Parish require any additional site specific information, please do not hesitate to contact me.

Yours sincerely



  
**Associate Director**



## Appendix 1: Site Location Plan

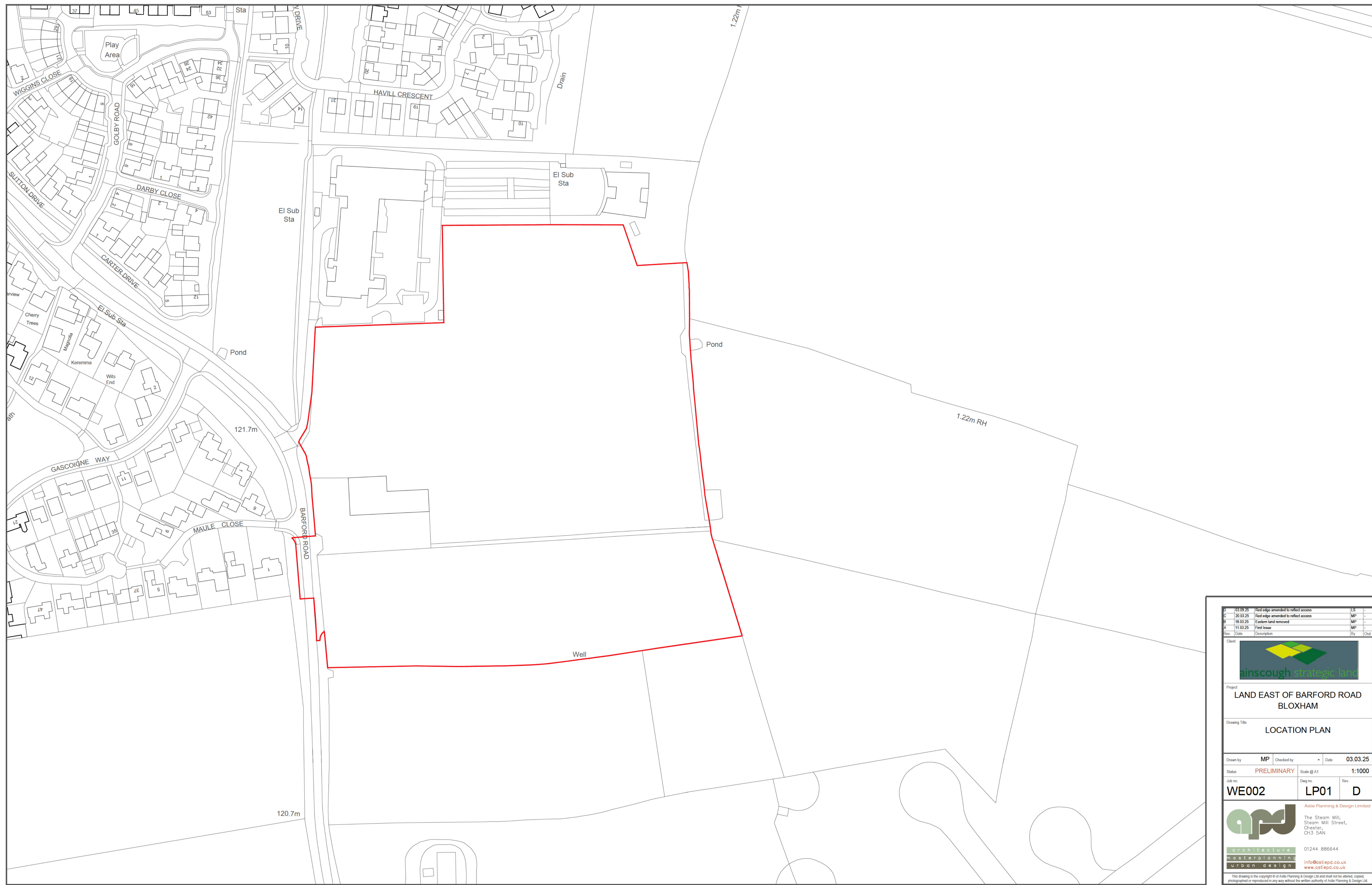
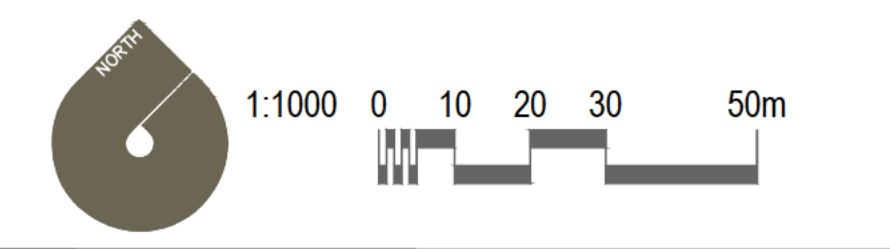
**Bloxham NE Reg 14 Responses**

**Disclaimer:**  
Do not scale from this drawing.  
All contractors must visit the site and be responsible for taking and checking dimensions.  
All construction information should be taken from figured dimensions only.  
Any discrepancies between drawings, specifications and site conditions must be brought to the attention of the supervising officer.

This drawing is for planning purposes only. It is not intended to be used for construction purposes. Whilst all reasonable efforts are used to ensure drawings are accurate, Astle Planning and Design Ltd accept no responsibility or liability for any reliance placed on, or use made of, this plan by anyone for purposes other than those stated above.

# LAND EAST OF BARFORD ROAD, BLOXHAM

## LOCATION PLAN



D	03.03.25	Red edge amended to reflect access	LS	-
C	20.03.25	Red edge amended to reflect access	MP	-
B	18.03.25	Eastern land removed	MP	-
A	11.03.25	First Issue	MP	-
Rev	Date	Description	By	Chd

Client

Project  
**LAND EAST OF BARFORD ROAD  
BLOXHAM**

Drawing Title  
**LOCATION PLAN**

Drawn by **MP** | Checked by **-** | Date **03.03.25**

Status **PRELIMINARY** | Scale @ A1 | 1:1000

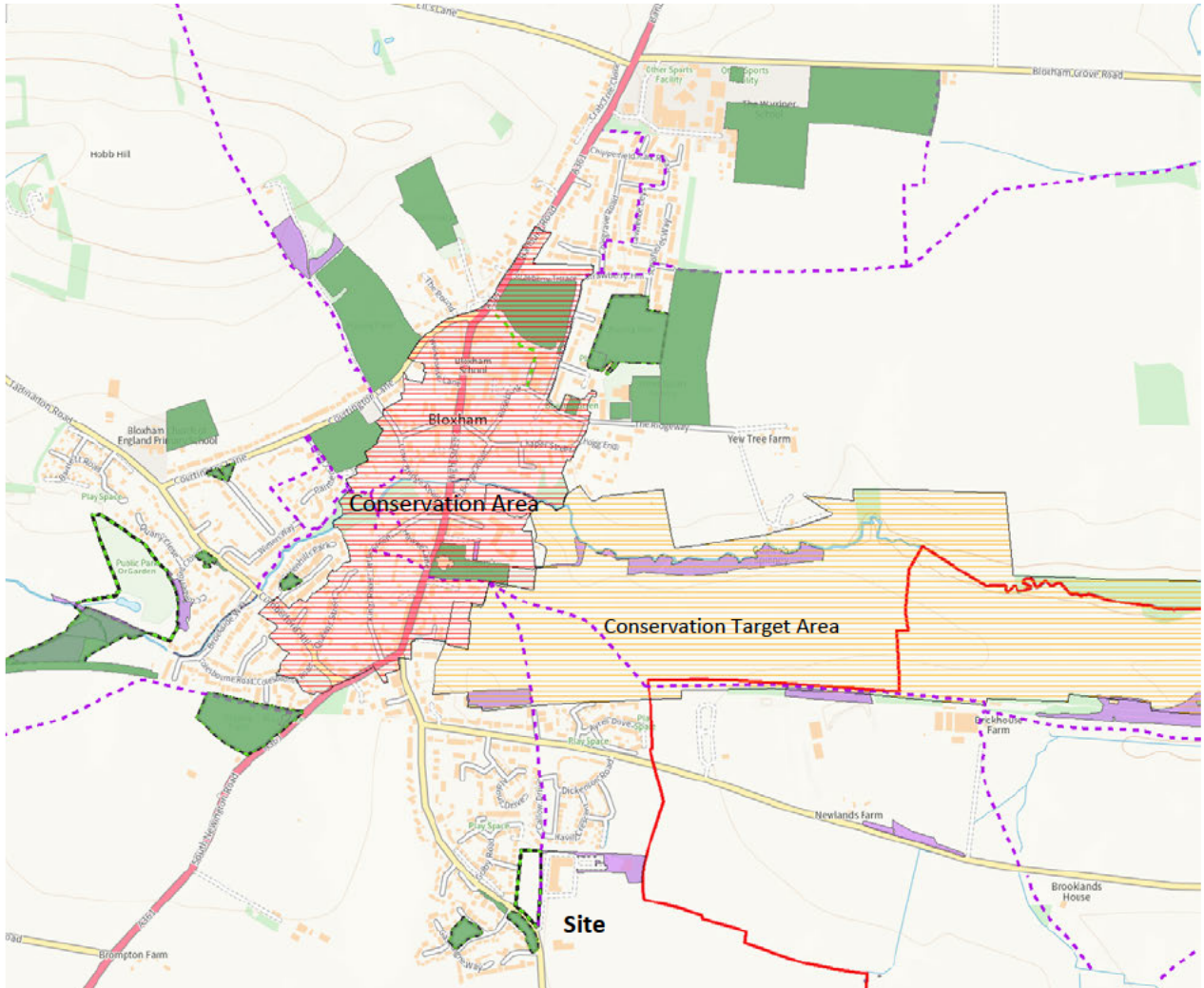
Job no. **WE002** | Dwg no. **LP01** | Rev. **D**

Astle Planning & Design Limited  
The Steam Mill,  
Steam Mill Street,  
Cherster,  
CH3 5AN

01244 886644  
info@astlepd.co.uk  
www.astlepd.co.uk

This drawing is the copyright © of Astle Planning & Design Ltd and shall not be allowed, copied, photographed or reproduced in any way without the written authority of Astle Planning & Design Ltd.

## Appendix 2: Cherwell Local Plan Policies Map extract



Submitted by: Anonymous user

Submitted time: Sep 15, 2025, 4:48:37 PM

## Contact details

First name

[REDACTED]

Last name

[REDACTED]

Are you responding as an individual or as a representative of a wider group?

**Responding on behalf of a group**

Please name the group here

**Taylor Wimpey**

Email address

[REDACTED]

Postal address

[REDACTED]

Do you consent to your contact details being passed to Cherwell District Council (CDC)?

**Yes, I agree**

## Policy BL1: Spatial Plan for Bloxham

Do you have any comments about Policy BL1: Spatial Plan for Bloxham?

**Please see Taylor Wimpey's comments in the accompanying Draft Bloxham Neighbourhood Plan Note.**

## Policy BL2: Land East of Tadmarton Road ('Painters Farm')

Do you have any comments about Policy BL2: Land East of Tadmarton Road ('Painters Farm')?

**Please see Taylor Wimpey's comments in the accompanying Draft Bloxham Neighbourhood Plan Note.**

## Policy BL8: Local Infrastructure

Do you have any comments about Policy BL8: Local Infrastructure?

**Please see Taylor Wimpey's comments in the accompanying Draft Bloxham Neighbourhood Plan Note.**

## Policy BL15: Local Green Spaces & Other Amenity Spaces

Finally, do you have any comments about the Modified Bloxham Neighbourhood Plan as a whole?

**Please see Taylor Wimpey's comments in the accompanying Draft Bloxham Neighbourhood Plan Note regarding their comments on a number of matters including the suitability of their site (Site 5 in the dBNP evidence) being identified for potential residential development.**



## Memo

**Our ref** 14910/01/DL  
**Date** 15 September 2025  
**From** Lichfields on behalf of Taylor Wimpey

### Subject Bloxham Questionnaire

<https://survey123.arcgis.com/share/91095f4559ef4e668d12eff20773f4dc>

Questions	Answers
First Name	
Are you responding as an individual or as a representative of a wider group?	Lichfields on behalf of Taylor Wimpey
Email address	
Postal address	
Do you consent to your contact details being passed to Cherwell District Council (CDC)?	Yes
Do you agree with the inclusion of Policy BL1: Spatial Plan for Bloxham	
Do you have any comments about Policy BL1: Spatial Plan for Bloxham?	Please see Taylor Wimpey's comments in the accompanying Draft Bloxham Neighbourhood Plan Note.
Do you agree with the inclusion of Policy BL2: Land East of Tadmarton Road ('Painters Farm')	
Do you have any comments about Policy BL2: Land East of Tadmarton Road ('Painters Farm')	Please see Taylor Wimpey's comments in the accompanying Draft Bloxham Neighbourhood Plan Note.
Do you agree with the inclusion of Policy BL3: Connectivity	
Do you have any comments about Policy BL3: Connectivity	
Do you agree with the inclusion of Policy BL4: Parking	
Do you have any comments about Policy BL4: Parking	
Do you agree with the inclusion of Policy BL5: Housing Mix	
Do you have any comments about Policy BL5: Housing Mix	
Do you agree with the inclusion of Policy BL6: Adapting Homes to meet Demographic Change	
Do you have any comments about Policy BL6: Adapting Homes to meet Demographic Change	


**LICHFIELDS**

Questions	Answers
Do you agree with the inclusion of Policy BL7: Residential Amenity	
Do you have any comments about Policy BL7: Residential Amenity	
Do you agree with the inclusion of Policy BL8: Local Infrastructure	
Do you have any comments about Policy BL8: Local Infrastructure	Please see Taylor Wimpey's comments in the accompanying Draft Bloxham Neighbourhood Plan Note.
Do you agree with the inclusion of Policy BL9: General Design Guidance	
Do you have any comments about Policy BL9: General Design Guidance	
Do you agree with the inclusion of Policy BL10: Design in the Conservation Area	
Do you have any comments about Policy BL10: Design in the Conservation Area	
Do you agree with the inclusion of Policy BL11: Key Streetscenes & Views	
Do you have any comments about Policy BL11: Key Streetscenes & Views	
Do you agree with the inclusion of Policy BL12: Employment Land	
Do you have any comments about Policy BL12: Employment Land	
Do you agree with the inclusion of Policy BL13: Village Centre	
Do you have any comments about Policy BL13: Village Centre	
Do you agree with the inclusion of Policy BL14: Broadband & Mobile Communications	
Do you have any comments about Policy BL14: Broadband & Mobile Communications	
Do you agree with the inclusion of Policy BL15: Local Green Spaces & Other Amenity Spaces	
Do you have any comments about Policy BL15: Local Green Spaces & Other Amenity Spaces	
Finally, do you have any comments about the Modified Bloxham Neighbourhood Plan as a whole?	Please see Taylor Wimpey's comments in the accompanying Draft Bloxham Neighbourhood Plan Note regarding their comments on a number of matters including the suitability of their site (Site 5 in the dBNP evidence) being identified for potential residential development.

The logo for Lichfields, featuring the word "LICHFIELDS" in white, bold, uppercase letters on a black rectangular background.

## Briefing Note

---

**Our ref** 14910/01/DL/SWt  
**Date** 15 September 2025  
**To** Bloxham Parish Council  
**From** Lichfields on behalf of Taylor Wimpey

### Subject **Bloxham Draft Neighbourhood Plan Consultation**

---

#### 1.0 Introduction

- 1.1 These representations are submitted by Lichfields on behalf of Taylor Wimpey (TW) to the draft Bloxham Neighbourhood Plan (dBNP) Consultation.
- 1.2 TW have engaged with Bloxham Parish Council (BPC) in the preparation of dBNP process. This has included TW and their team attending two meetings with BPC and submitting information and plans at their request.
- 1.3 TWs engagement in the dBNP process has focussed on their site at Milton Road which is identified as Site 5 within the dBNP evidence base (and hereafter referred to as “*the TW site*”). TW are also promoting the site, which has scope to accommodate up to 230 dwellings and community facilities<sup>1</sup>, through the emerging Cherwell Local Plan (CLP).
- 1.4 Whilst the TW site has received generally favourable analysis within the dBNP and associated evidence base, and is the site in the village with the most favourable analysis within the draft Cherwell Local Plan (dCLP) HELAA<sup>2</sup> it has not been identified as a proposed residential allocation within the dBNP.
- 1.5 These representations set out TWs concerns about the dBNP in the light of the requirements of the “*basic conditions*”<sup>3</sup>.
- 1.6 TW would be happy to discuss these concerns further with BPC and we request that we are kept updated on subsequent iterations of the draft BNP.

#### 2.0 Do you have any comments about Policy BL1: Spatial Plan for Bloxham

- 2.1 A key consideration for the dBNP process is identifying an appropriate level of housing need.
- 2.2 One of the objectives of the dBNP (para. 3.2) however refers to the intention (Lichfields emphasis) “*to plan for a scale of housing growth that can be accommodated within the constraints of the village infrastructure*”. This suggests that there is a (non-defined) cap on the extent of appropriate ‘housing growth’ arising from ‘constraints of

---

<sup>1</sup> As summarised on pg iii of the Strategic Environmental Assessment (SEA) (July 2025) prepared by AECOM for BNP

<sup>2</sup> <https://www.cherwell.gov.uk/downloads/download/1799/housing-and-economic-land-availability-assessment-helaa>

<sup>3</sup> As set out in the PPG Para 065 Reference ID 41-065-20140306

# LICHFIELDS

village infrastructure' such that it could not accommodate a higher level of development than that proposed.

- 2.3 The dBNP does not however seek to identify, or assess the implications of, the alleged *"constraints of the village infrastructure."*
- 2.4 Conversely it is clear that the dBNP (pg. 8) and associated evidence base identifies that Bloxham has a young population with five educational facilities (including one private and two SEND facilities) as well as Jubilee Park Hall, church, pub, shops, bed and breakfast, playground and museums as well as 70 businesses at Bloxham Mill.
- 2.5 It also identifies (pg. 21) that *"Bloxham has a dynamic and successful mix of micro-businesses mostly operating from homes or from Bloxham Mill Business Centre."*
- 2.6 Furthermore the dBNP Appendix A : Site Assessment and Selection recognises (para 12) *"its location very close to the largest town in CDC – Banbury."*
- 2.7 The range of educational, retail, community and commercial facilities alongside the villages proximity to Banbury all emphasise the sustainable nature of Bloxham as a village capable of accommodating further residential development. They are also consistent with representations submitted by TW to both the dBNP and dCLP which highlight the sustainability credentials of Bloxham.
- 2.8 Indeed, all of these matters are consistent with the fact that Bloxham is a Category A village defined by Policy Villages 1 as one of *"most sustainable village[s]"*<sup>4</sup>. Its position in the development plan settlement hierarchy means both that is a highly sustainable location for development and the housing needs it seeks to meet should aim beyond delivering a proportional need, because settlements lower in the hierarchy are, in reality, less likely to meet their own needs on a proportionate basis.

## Housing Need Calculations

- 2.9 Whilst we recognise that the housing need calculations in the dBNP exceeds the requirement set by draft Policy RUR1 in the draft Cherwell Local Plan (dCLP) (which is in line with the PPG which requires Neighbourhood Plans to *"meet their housing requirement, and where possible to exceed their housing requirement"* (para 103 Reference ID: 41-103-20190509) it is important to note that the dCLP overall is based on a much lower number (being based on the December 2023 Standard Method and not the current (December 2024) Standard Method).
- 2.10 Furthermore TW, alongside a number of other parties, are challenging the housing need analysis within the dCLP which increases the importance of the dBNP making realistic assumptions about appropriate levels of housing need.
- 2.11 In addition we note that the dBNP housing need calculations make no assumptions regarding *"unmet need"* from Oxford City Council (OCC) which the current development plan allows for and which is a key area of contention (and subsequent discussion through the forthcoming Local Plan examination process) in respect of the dCLP process.

<sup>4</sup> Cherwell Local Plan 2011-2031 Part 1 Policy Villages 1: Village Categorisation

# LICHFIELDS

- 2.12 We also note that the dBNP states on the cover that it refers to the 2025-40 period, but the housing requirement policy on runs to 2037. This discrepancy means that the draft BLP has failed to have regard to an additional 3 years of housing need. A further 3 years at 21.8 dwellings per annum<sup>5</sup> would require the allocation of an additional 65.4 dwellings over those within the dBNP at this stage.
- 2.13 All of these matters strongly indicate the importance of the dBNP planning for a higher level of housing need and allocating sufficient sites accordingly.

## Draft Housing Allocations

- 2.14 Policy BL1 allocates three sites. We deal with Site (iii) (confusingly called Site 1 elsewhere within the dBNP and corresponding evidence base) in our subsequent comments related to BL2 : Land at Tadmarton Road (Painters Farm).
- 2.15 With regards to Site (i) (North of Ells Lane) we note that Outline Planning Permission was approved in January 2024 and a subsequent Reserved Matters Submission was made in August 2025 for 29 dwellings (one dwelling less than the total permitted under the outline planning permission).
- 2.16 Site (ii) (South of Hartshill Close) received a resolution to grant at the 15 May 2025 Planning Committee, subject to conditions and the completion of a S106 agreement but planning permission has not yet been granted. This highlights the unpredictability over the certainty and timing of such sites progressing and being delivered.
- 2.17 As expanded upon in our response to BL2 (below) TW consider their site (Site 5 within the dBNP evidence base) should form a residential allocation through draft Policy BL1. This reflects both the accepted suitability of their site for residential development and doubts around the suitability and deliverability of the proposed allocations in Policy B1.
- 2.18 Notwithstanding this, if the dBNP ultimate proceeds on the basis of (i) all of the draft allocations currently identified in Policy BL1 and / or (ii) without recognising the need for further residential allocations, TW consider that, in these circumstances, the dBNP would be greatly strengthened by the inclusion of the TW site as a “reserve site” if any of the aforementioned allocations do not come forward in an appropriate timescale.

## 3.0 Do you have any comments about Policy BL2: Land East of Tadmarton Road ('Painters Farm')

- 3.1 The dBNP concludes (pg. 34). that only Sites 1 and 5 could be “*considered reasonable alternatives and they were assessed as such by the separate SEA, also carried out by AECOM as part of the wider assessment of the draft policies. The SEA indicated both sites have the potential for positive and adverse effects that could be mitigated through allocation policy requirements*”

---

<sup>5</sup> dBNP page 12 states “*The Parish Council has used the new Standard Method as a starting point for deriving an indicative housing figure for this policy which presently equates to 21.8 homes per year*”.



- 3.2 It notes that both sites “*would enable the village to grow and at the same time deliver the kind of step change in infrastructure capacity that this growth (and recent growth) will require to maintain a sustainable village that is not exporting students, patients and those seeking community facilities to access local services*” (pg. 34).
- 3.3 It goes on to state that “*the Parish Council chose to allocate Site 1 as it would directly deliver the most important benefit in the only plausible location and deliver other community benefits*”.
- 3.4 We understand that the reference to “*the most important benefits*” relates to the assertion in the dBNP (pg 32) that “*increasing the capacity of the village primary school was its most important priority.*”
- 3.5 TW have specific concerns about this approach and analysis underpinning this, specifically:
  - The striking differences in the analysis of Sites 1 (draft Allocation BL2) and 5 (the TW allocation) between the CDC HELAA (November 2024) and the dBNP SEA (July 2025);
  - The extent of the evidential basis of the assertion that the increased capacity of the village primary school is the “*most important priority*” and the deliverability of this’; and
  - TW’s initial concerns about the access and deliverability of the uses proposed on Site BL2
- 3.6 We expand upon each of these concerns in turn below.

**Analysis of Sites 1 and 5 (Lichfields emphasis)**

- 3.7 We summarise below the summary of both sites within the recent CDC HELAA (November 2024).
- 3.8 These highlight the HELAAs favourable consideration of Site 5 and concerns regarding site 1. Indeed in respect of Site 1 the HELAA notes “*The site is considered to be unsuitable for development as it would not form a cohesive village extension and would protrude the built edge northwards into the open countryside.*”

	<b>Land East of Tadmarton Road (‘Painters Farm’) (Site 1)</b>	<b>Land North and South of Milton Road, Bloxham (Site 5) (TW site)</b>	<b>Lichfields Commentary</b>
<b>CDC HELAA Nov 2024<sup>6</sup></b>	<b><i>The site is considered to be unsuitable for development as it would not form a</i></b>	<i>The site is relatively flat, and several PROWs run through the site. <b>There is potential for the two sites straddling</b></i>	The HELAA concludes that land at Tadmarton Road, Bloxham is not suitable or

<sup>6</sup> <https://www.cherwell.gov.uk/downloads/download/1799/housing-and-economic-land-availability-assessment-helaa>



	<p><b>cohesive village extension and would protrude the built edge northwards into the open countryside.</b> <i>There is a made neighbourhood plan. Development of this site may also prevent the potential expansion of the primary school, as the site envelope the school.</i></p> <p>Land at Tadmarton Road, Bloxham (HELAA094)</p>	<p><b>Milton Road to accommodate residential development in the south and some residential development in the north, with access via Milton Road.</b> <i>There is a made neighbourhood plan. Estimated capacity is based on a discounted rural density multiplier.</i></p> <p>Land North and South of Milton Road, Bloxham (HELAA518)</p>	<p>achievable. Land North and South of Milton Road, Bloxham on the other hand is considered suitable, available and achievable. Site 5 is therefore the preferable site based on the HELAA analysis.</p>
<p><b>AECOM SEA July 2025<sup>7</sup></b></p>	<p><b>It has also committed to providing land for the expansion of Bloxham Church of England Primary School, which is adjacent to the site, and therefore would deliver the community benefit with the highest priority. In addition, it proposes land for a burial ground and the conversion of a barn for a variety of potential community uses (e.g. a library) once its agricultural use ends with the development of the surrounding land.</b> (SEA, pg. 3)</p>	<p><b>It also proposes to deliver land for a burial ground, allotments / orchard, and a new community facility (e.g. a library), and would therefore deliver the three identified community benefits with the highest priority.</b> <i>The SOA Report concludes that, given the heritage constraints associated with the site, it is not considered to be a favourable site for allocation through the NP if more suitable sites are available. However, the report also states that if development were to be</i></p>	<p>Both sites will deliver land for burial ground, a new community facility (e.g. library). In addition, TWs site (Site 5) is recognised as being capable of providing land for allotments/ orchard.</p> <p>Site 1 contends that it will provide land for the expansion of Bloxham Church of England Primary School. Whilst the Taylor Wimpey site (Site 5) will not directly provide land it could provide funding towards the primary</p>

<sup>7</sup>[https://www.bloxhamparishcouncil.gov.uk/securedocs/Bloxham%20NP%20SEA%20Environmental%20Report\\_V2\\_Jul25\\_Consultation%20Version.pdf](https://www.bloxhamparishcouncil.gov.uk/securedocs/Bloxham%20NP%20SEA%20Environmental%20Report_V2_Jul25_Consultation%20Version.pdf)



		<i>contained within the western part of the site, or the two parcels of land straddling Milton Road, it is potentially suitable for development. (SEA, pg. 3)</i>	<p>school expansion thus both sites offer similar benefits.</p> <p>The northeastern corner of Site 5 lies within the Bloxham Conservation Area however residential development is envisaged outside of this. On this basis, it is unclear why the SOA considers there to be heritage constraints.</p>
<b>dBNP</b>  <b>July 2025<sup>8</sup></b>	<i>The additional homes will allow the <b>Parish Council to extend the plan period to 13 years, i.e. to 2037</b> (dBNP, pg. 34)</i>	<i>Its homes <b>would enable the plan period to be extended to 2042</b></i> (dBNP, pg. 34)	No rationale has been provided so it is unclear how this conclusion has been reached. This is particularly relevant given the conflict summarised above with the dBNP period identified on the cover as extending to 2040
<b>dBNP</b>  <b>July 2025</b>		<i>Site 5 ... will ultimately <b>need to supply 230 homes</b> in return for those benefits, using some development parcels well beyond a 400m walk from the village centre. And again, the scheme could help fund primary school expansion but could not deliver it and would place greater</i>	The Taylor Wimpey Site (Site 5) has only been assessed at the higher level of development but as per its previous promotion and discussions with Bloxham Parish Council the site can deliver anything between 100-230 homes.

<sup>8</sup><https://bloxhamparishcouncil.gov.uk/images/news/Bloxham%20Neighbourhood%20Plan%202%20Draft%206%20Consultation%20Version.pdf>



		<i>pressure on catchment area places</i>	
--	--	--	--

3.1 On this basis it is not clear how BNP have subsequently summarised the Site 1, in their “Statement regarding mis-information relating to the [dBNP]”<sup>9</sup> (1 September 2025) (para 4) that “the site selected as the preferred site was number 1 from Cherwell District Councils HELAA Report, which is land east of Tadmarton Road which could accommodate up to 125 homes.” This statement is not consistent with the summary of the HELAA set out above.

3.2 Indeed it appears that Site 1 has been selected over TWs Site (Site 5), irrespective of the objective analysis undertaken by CDC because it will ‘deliver the community benefit with the highest priority’, namely school expansion land. However, the dBNP evidence base recognises that both sites could contribute towards this whether it be through physical land or funds (along with the other community benefits – i.e. burial ground, community facility etc).

**Concerns regarding SEA Summary of Findings**

3.3 TW also have a number of concerns regarding the analysis within the dBNP Strategic Environmental Assessment (July 2025).

3.4 Table 5.2 of the SEA sets out its summary of findings of Option 1 (Site 1) and Option 2 (Site 5). TW have a number of concerns regarding the some of these rankings which risk appearing contrived for the reasons set out below.

3.5 In essence the TW site is consistently ranked second to Site 1 despite this conclusion either not necessarily being reflected in, or qualified by, the corresponding analysis. We highlight examples of this below.

Relevant SEA Topic	SEA Rank		SEA Conclusion (Lichfields emphasis)
	Option 1 – Site 1	Option 2 – Site 5	
Air quality	1	2	No significant effects are considered likely under either option. <b>Option 1 is ranked slightly more favourably than Option 2</b> as

<sup>9</sup> <https://www.bloxhamparishcouncil.gov.uk/news-story.php?newsid=221>

# LICHFIELDS

			it proposes the deliver a slightly lower level of growth.
Biodiversity and geodiversity	1	2	Overall, <b>no significant effects are considered likely under either option.</b> Neither option is particularly constrained from a biodiversity and geodiversity standpoint, especially with regard to internationally and nationally designated sites. Nevertheless Option 1 is ranked slightly more favourably than Option 2
Climate change and flood risk	1	2	Overall, <b>no significant effects are considered likely under either option</b> with regard to climate change and flood risk. Option 1 is ranked slightly more favourably than Option 2 as fluvial flood risk <sup>10</sup> is more difficult to mitigate
Community wellbeing	1	2	Overall, <b>both options are predicted to lead to significant positive effects</b> However the scale of Option 2 <i>“would likely be too high . . . for the primary schools existing capacity.”</i>
Historic environment	1	2	<b>Uncertainty</b> is noted under <b>Option 1</b> ; whilst this location is relatively unconstrained from a heritage standpoint, the size and position of this site could still adversely impact the overall historic character of the village.
Landscape	1	2	Overall, <b>both options have the potential to lead to significant negative effects</b> by significantly changing the size and character of the village
Transportation	1	2	Overall, <b>no significant effects</b> are anticipated under either of the options. Option 1 is ranked slightly more favourably than Option 2 as it proposes the deliver a slightly lower level of growth [sic]

## Extent to which school expansion is a recognised priority

- 3.6 The extent, and longevity, of the assertion in the dBNP that the school expansion forms a ‘priority’ for the village is unclear.
- 3.7 We note in respect of planning application Ref. 25/01009/OUT for an outline application of up to 120 dwellings, Bloxham Parish Council have objected. Their objection<sup>11</sup> includes a Bloxham PC - Community Benefits List (Updated March 2025) With regards to education

<sup>10</sup> Despite Option 2 being at “low risk”

<sup>11</sup> Recorded on the CDC website as being registered on 15<sup>th</sup> August 2025

# LICHFIELDS

their August 2025 response notes *“if an expansion at Bloxham Primary School is necessary, funds are also allocated for practical elements such as funds for classroom equipment e.g, tables, chairs, books, pens etc etc. The School cannot be expected to cover these costs if an expansion is planned by the Local Authority”*. The phrasing ‘if an expansion is needed’ suggests this was not the accepted position of BPC, within the last few months, and as such this conflicts with the suggestion that its expansion *‘is a high priority’*.

- 3.8 Furthermore in the March 2025 Community Benefits List the education contribution is just one of 23 aspirations of BNP (7 identified as CDC requirements and 16 as OCC requirements) with no ranking / prioritisation of them. Just 4 months later (July 2025) the dBNP identifies that (Appendix A pg 31)BNP considered *“the capacity of the village primary school was its most important priority.”*

## Potential BL2 access and deliverability constraints

- 3.9 Transport Planning Associates (TPA) have undertaken an initial review of the proposed access and connectivity of Site 1 based on the indicative layout plan (dBNP pg 15). This has identified the following concerns:
- 1 The proposals for Site 1 suggest that the barn buildings on the site will be redeveloped for community use with access likely to involve the closure of the existing agricultural access and the construction of a new junction. Plan 1 Illustrative Concept Plan for BL2: Land East of Tadmarton Road (dBNP, pg. 15), does, however, suggest that the access will be located in the ‘south-western extents of the site, which may bring into question, the suitability of access visibility.
  - 2 Note 16 attached to Plan 1 Illustrative Concept Plan for BL2: Land East of Tadmarton Road (dBNP, pg. 15) suggests that a route will be provided to Courtington Lane suitable for mobility scooters and, as this currently forms an agricultural access, would be of a suitable width for the shared use of various active travel user groups, such as cyclists, pedestrians and those using a mobility scooter. However, the local footways of Bloxham are unlikely to be suitable for mobility scooter use, and the onward route to the village centre, is along Little Bridge Road, where there is no footway for pedestrians or those with impaired mobility. A route to the village centre would then follow Stone Hill, where there is a narrow footway on one side, unsuitable for those with impaired mobility. The absence of a footway along a key and important route, for this site, to the village centre provides a level of segregation and significantly reduces accessibility to the village centre.
  - 3 Whilst Site 1 is closer to the village centre than Site 5, the segregation caused by the absence of a footway along Little Bridge Road, counts against this site’s accessibility. Less confident pedestrians, or parents with younger, less experienced walkers, will, most likely chose to drive, rather than walk to the village centre.
  - 4 An alternative route for pedestrians might be to use the Tadmarton Road access and then follow a route along the A361, where they would use the same infrastructure as those that might walk from the Milton Road site. In this regard, Site 1 is no more accessible than Site 5.

# LICHFIELDS

- 3.10 Overall, as acknowledged, the TW Site (Site 5) can be considered a reasonable alternative to Site 1. Site 5 is recognised (dBNP Appendix) (pg 32) as offering the community benefits of a burial ground, allotments / orchard and a new facility (eg library) as Site 1 whilst also having the better dCLP HELAA analysis of the two sites.
- 3.11 There are also number of concerns over the access and connectivity of Site 1. For these reasons TW respectfully request that Bloxham Parish Council reconsider their allocation of Site 1 and instead allocate Site 5.

## **Summary of TW comments on the dBNP site selection evidence base**

- 3.12 As TWs extensive analysis above identifies they have substantial concerns both that the dBNP evidence base is not consistent with that of the dCLP HELAA and the robustness of the dBNP evidence base itself.
- 3.13 Overall the robustness of the analysis underpinning the site assessment within emerging development plans is a critical consideration.
- 3.14 The PPG states (Paragraph: 004 Reference ID: 3-004-20190722”
- “This guidance indicates what inputs and processes can lead to a robust assessment of land availability. Plan-making bodies are expected to have regard to the guidance in preparing and updating their assessments. Where they depart from the guidance, it will be important to explain the reasons for doing so when setting out the evidence base that informs the plan. Assessment needs to be thorough but proportionate, building where possible on existing information sources outlined within the guidance”*
- 3.15 For the reasons set out above TW have strong concerns that the dBNP evidence base does not reflect the robustness required by the PPG and this is consistent with it reaching entirely different conclusions on both sites to the recent dCLP HELAA analysis undertaken by CDC.

## **4.0 Do you have any comments about Policy BL8: Local Infrastructure**

- 4.1 Despite the importance placed by the dBNP on safeguarding land for school expansion draft Policy BL8 requires housing proposals to *“demonstrate there is sufficient capacity at the Bloxham primary school to meet the needs of the assessed number of primary school age children living in the completed scheme”*.
- 4.2 This emphasises the current uncertainty around the potential deliverability, and timescales, for the envisaged school extension.