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Sustainability Appraisal (SA) of the Cherwell Local Plan Review

Interim SA Report

January 2023



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1 Introduction

1.1 Background

- 1.1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the Cherwell Local Plan Review (LPR). Once in place, the LPR will establish a strategy for growth to 2040, allocate sites to deliver the strategy and establish the policies against which planning applications will be determined.
- 1.1.2 SA is a mechanism for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. SA is required for Local Plans.¹

1.2 SA explained

- 1.2.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.2.2 In-line with the Regulations, a report (known as the **SA Report**) must be published for consultation alongside the draft plan that appraises the effects of implementing “the plan and reasonable alternatives”. The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.2.3 More specifically, the SA Report must answer the following **three questions**:
- What has Plan-making / SA involved up to this point?
 - including appraisal of ‘reasonable alternatives’
 - What are the SA findings at this stage?
 - i.e. in relation to the draft plan
 - What are next steps?

1.3 This Interim SA Report²

- 1.3.1 At this current stage of the plan-making process, the Council is consulting on a draft version of the LPR under Regulation 18 of the Local Planning Regulations.
- 1.3.2 This report is published with the intention of informing the consultation and subsequent preparation of the final draft (‘proposed submission’) version of the plan.

Structure of this report

- 1.3.3 Despite the fact that this is an ‘Interim’ SA Report, and does not need to provide the information required of the SA Report, it is nonetheless helpful to structure this report according to the **three questions** above.
- 1.3.4 Before answering the first question, there is a need to further set the scene by setting out:
- the plan’s aims and objectives; and
 - the scope of the SA.

Commenting on this report

- 1.3.5 This report can be referenced as part of comments on the draft plan and/or comments can be made specifically on any part of this report. Further guidance is provided below, including under ‘next steps’.

¹ Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2021). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the ‘Proposed Submission’ plan document.

² See **Appendix I** for further explanation of the regulatory basis for answering certain questions within the SA Report and, in turn, this Interim SA Report, as well as a ‘checklist’ explaining more precisely the regulatory basis for presenting certain information.

2 Plan aims and objectives

2.1 Introduction

2.1.1 The aim here is to briefly introduce the:

- context to plan preparation, including the current adopted local plan for Cherwell;
- the plan area (ahead of more detailed discussion elsewhere in the report);
- the plan period; and
- the objectives that are in place to guide plan preparation (the 'plan scope').

2.2 Context to plan preparation

2.2.1 Once in place the Cherwell Local Plan Review (LPR) will be known as the Cherwell Local Plan 2040, and will largely supersede the adopted local plan, comprising the Cherwell Local Plan (adopted in 2015) and its Partial Review (adopted in 2020, dealing with Oxford's unmet housing needs), which look to 2031.

2.2.2 The requirement to regularly review the local plan stems from paragraphs 22 and 68 of the NPPF, which require local plans to look ahead over at least a 15 year period, and paragraph 33, which states: *"Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy..."*

2.2.3 A key task is to consider allocation of new sites to deliver growth over-and-above 'completions' (sites that have already come forward and been completed, since April 2020) and 'commitments' (sites with an extant planning permission or allocation). Focusing on planning for new homes, there is an 'existing supply' from completions and commitments of 20,654 homes to 2040 (and a further 2,188 homes post 2040).³

2.2.4 There is also a need to consider *when* commitments are due to come forward, and seek to bolster the supply trajectory through the LPR, with a view to a steady trajectory over the entire course of the plan period (albeit that NPPF paragraph 68 supports flexibility for the latter years).

2.2.5 Wider key context comes from:

- Legislation, policy and guidance - for some time, the Government has been signalling its intention to make significant changes to the English planning system. In August 2020, it published its white paper 'Planning for the Future' and, in May 2022, it published its Levelling Up and Regeneration Bill. Whilst acknowledging that these changes may have significant implications for plan making in the future, the Government has reiterated the importance of maintaining progress to get up to date local plans in place. The Cherwell LPR is therefore based on the 2021 NPPF, the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning Act 1990. The primary regulations guiding plan preparation are the Town and Country (Local Planning) (England) Regulations 2012, and the LPR must also be prepared having regard to Government's Planning Practice Guidance (PPG). A primary consideration, central to the NPPF (paragraph 11) is a requirement to maintain an up-to-date local plan that meets objectively assessed development needs, as far as is consistent with sustainable development.
- The Duty to Cooperate - the plan must be prepared taking account of objectives and policies established by various organisations at the national and more local levels, in accordance with the Duty to Cooperate established by the Localism Act 2011. For example, there is a need to work closely with Oxfordshire County Council, the Local Enterprise Partnership (OxLEP), statutory environmental consultees, infrastructure providers and neighbouring local authorities. There are a wide range of important 'larger than local' considerations in the Oxfordshire context, including those that were being considered through the process of preparing the Oxfordshire Plan 2050, prior to the plan-making process being halted in August 2022 (see the joint statement from the leaders of the Oxfordshire Councils [here](#)). Another key body with an Oxfordshire-wide focus is [England's Economic Heartland](#), who are the regional transport body (also with a wider infrastructure remit); and there is also a need to be mindful of Government's work across the Oxford to Cambridge Arc ([Ox Cam](#)).

³ There is also feasibly the potential to revisit existing allocations, with a view to possible deallocation; however, this is not common practice, recognising that existing allocations have been deemed 'sound' through examination in public.

- Neighbourhood planning - the LPR must naturally take account of 'made' and emerging neighbourhood plans, with made neighbourhood plans for Adderbury, Bloxham, Hook Norton, Mid Cherwell and Weston-on-the-Green, and several others in preparation. Neighbourhood plans must be in general conformity with the local plan, but it is equally the case that neighbourhood plans inform the local plan preparation.

2.3 The plan area

- 2.3.1 Although it is one of the fastest growing areas in the South East, Cherwell remains a predominantly rural district. It has a population of approximately 150,000 people mainly concentrated in the three urban centres of Banbury, Bicester and Kidlington. Banbury is the largest settlement with 32% of the population, Bicester has 24% and Kidlington 13%. The rural area accounts for the remaining 31% of the population.
- 2.3.2 Over the last twenty years the population of Cherwell has grown by over 16% and it is forecast to grow further to approximately 170,000 by 2043. Much of this increase is as a result of significant housing and employment growth directed by previous local plans, particularly at Banbury and Bicester. The argument for growth largely reflects the district's location at the fulcrum of two nationally significant knowledge intensive economic growth areas: the Oxford-Cambridge Arc and the Oxfordshire Knowledge spine.
- 2.3.3 Cherwell has excellent transport links, with the M40 motorway passing close to Banbury and Bicester, direct rail links from Banbury and Bicester to London, Birmingham and Oxford, and a forthcoming East West Rail (EWR) link between Bicester and Milton Keynes. The Oxford to Bicester EWR link is already running, with a new station at Oxford Parkway linking Oxford to London via Bicester.
- 2.3.4 The district is characterised by distinctive and diverse towns and villages, with a total of 80 town and parish councils. Most of the villages and hamlets retain their traditional character and, in total, there are 60 conservation areas and approximately 2,300 listed buildings. There is also a large number of scheduled monuments (38) and nationally registered parks and gardens (10), plus there is a historic civil war battlefield, and Blenheim Palace World Heritage Site is adjacent to the district boundary. Also, Bicester Airfield and former RAF Upper Heyford are of national historic importance.
- 2.3.5 Cherwell's natural environment is also varied and highly valued, including given its contribution to local character, and wide-ranging other 'ecosystem services' provided. The River Cherwell and Oxford Canal run north-south through the district. There are Ironstone Downs in the north west, which include a very small area within the Cotswolds AONB (or 'national landscape'). The Ploughley limestone plateau, in the east, and the clay vale of Otmoor, in the south, also contribute to diversity and interest.
- 2.3.6 Part of the internationally important Oxford Meadows Special Area of Conservation (SAC) lies in the south west of the district, north of the boundary with Oxford City, and there are also several nationally designated Sites of Special Scientific Interest (SSSIs) as well as a network of locally designated sites, identified areas of non-designated 'priority habitat' and wider landscape-scale areas of biodiversity importance.
- 2.3.7 Much of the southern part of the district lies within the Oxford Green Belt, and the relationship between this part of the district and the internationally important city of Oxford is an ongoing strategic planning consideration. The Local Plan (2015) directed growth, over the period 2011-31 primarily to Bicester (44%) and Banbury (32%), as well as to Upper Heyford (10%), but the Partial Review (2020) then allocated a further 4,400 homes in the Kidlington area to meet the district's share of Oxford's unmet needs.
- 2.3.8 The plan area is shown in Figure 2.1, overleaf.

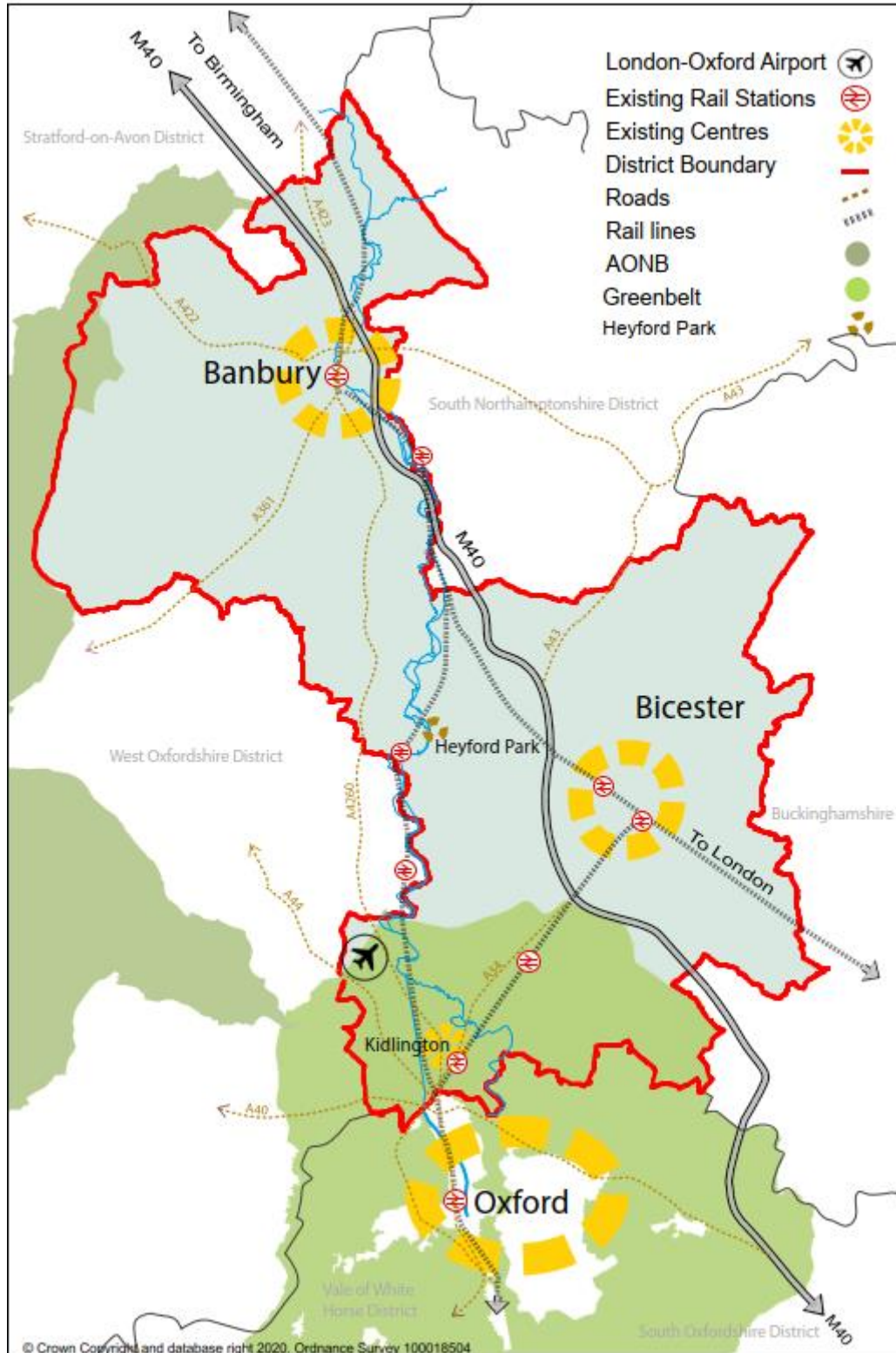
2.4 The plan period

Cherwell Local Plan 2040

- 2.4.1 The current local plan, which was adopted in 2015 (with the Partial Review then adopted in 2020) covers the period 2011 to 2031. The Local Plan Review (LPR) is likely to be adopted in 2024/25, and should cover a period of 15 years from plan adoption, hence an appropriate end date is 2040. The plan period begins in 2020 as this is the 'base date' for key evidence studies, notably the Oxfordshire Housing and Economic Growth Needs Assessment (HENA), commissioned by CDC and Oxford City Council.
- 2.4.2 In this light, objectively assessed development needs are calculated over the period 2020 to 2040, and the LPR must ensure that these needs will be met, as far as is consistent with sustainable development (and mindful of NPPF para 68, which allows for flexibility in respect of meeting needs over latter years).

2.4.3 Additionally, there is a need to be mindful of NPPF paragraph 22, which states: “Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.” There are clear arguments for taking a long-term approach to realising strategic growth related opportunities in the Cherwell and sub-regional context.

Figure 2.1: The plan area



N.B. the Bicester to Milton Keynes section of East West Rail is set to open in 2024. Further information is provided at: <https://www.networkrail.co.uk/running-the-railway/railway-upgrade-plan/key-projects/east-west-rail/bicester-to-bletchley-milton-keynes/>

2.5 Plan objectives

2.5.1 A list of objectives, to guide plan-making, was first published as part of the Options consultation in 2021, before being subjected to modest refinement and adjustment. The final objectives are presented below:

2.5.2 Local plan objectives are of key importance to the SA process, both because of their importance to the plan, and because of the legal requirement to define, appraise and consult on reasonable alternatives taking account of “*the objectives... of the plan.*”

Meeting the challenge of climate change and ensuring sustainable development

- Promote net zero carbon new developments, with high sustainable construction standards, and low embodied carbon to ensure new developments deliver the highest viable energy efficiency, including the use of decentralised energy; and support a local zero- carbon energy system that reduces Cherwell’s reliance on global fossil fuels and prioritises community energy.
- Deliver developments that efficiently use local natural resources (particularly water) and, that minimise and are resilient to the impacts of climate change, including extreme weather events such as flooding, drought and heatwaves.
- Improve air quality. Protect and maximise opportunities for biodiversity net gain and the enhancement of Cherwell’s natural capital assets, such as soils, woodlands, hedges and ponds in order to capture and store carbon.
- Maintain and improve the natural and built environment including biodiversity, landscape, green Infrastructure and waterways and by ensuring new development achieves high quality design standards and conserves and enhances the natural, historic, cultural and landscape assets of Cherwell.
- Prioritise active travel and increase the attraction of and opportunities for public transport, ensuring high standards of connectivity and accessibility to services for all. Reduce dependency on the private car as a mode of travel, facilitating the creation of a zero-carbon transport network.

Maintaining and developing a sustainable local economy

- Support a strong and sustainable economy within the district, including the visitor economy and agriculture, and ensure sufficient land is allocated to meet our identified needs.
- Increase education, training and skills, and encourage investment in the local workforce; improve and enhance digital connectivity and infrastructure, to support a sustainable and resilient economy, reduce inequality and help to reduce unnecessary transport.
- Support Cherwell’s urban centres, including where beneficial, redevelopment and renewal, to maintain and enhance their vitality, viability, distinctiveness and safety.
- Recognise the economic benefits of preserving and enhancing the character and beauty of Cherwell’s built and natural heritage, and landscape, and the wider benefits from its natural capital and ecosystem services to ensure Cherwell remains attractive to business and as a place to live, work and visit for current and future communities.

Building healthy and sustainable communities

- Meet the housing needs of all sectors of Cherwell’s communities, in a way that creates sustainable, well designed, safe, inclusive and mixed communities, promoting inter-generational connectivity and lifetime neighbourhoods.
- Create sustainable, well designed, distinctive places where healthy behaviours (being active, having opportunities to access a healthy diet, and having good social connections) are the norm and which provide a sense of belonging, safety, and a sense of community.
- Focus development in Cherwell’s sustainable locations, making efficient and effective use of land, conserving and enhancing the countryside, landscape, the natural environment, and the setting of its towns and villages.
- Protect and enhance the historic environment, including protecting and enhancing cultural heritage assets and archaeology, and promoting inclusive access to local assets where appropriate.
- Provide sufficient accessible, well maintained good quality services, facilities and infrastructure, to meet health, education, transport, open space, sport, recreations, cultural, social and other community needs.

3 The SA scope

3.1 Introduction

3.1.1 The scope of the SA refers to the breadth of sustainability issues and objectives that are taken into account as part of the assessment of reasonable alternatives and the emerging plan. It does not refer to the scope of the plan (discussed above) or the scope of reasonable alternatives (discussed below, in Part 1).

3.2 Consultation on the scope

3.2.1 The Regulations require that: *“When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA Report], the responsible authority shall consult the consultation bodies”*. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.⁴ As such, these authorities were consulted on the SA scope in 2020; this involved publication of a Scoping Report, which was then subsequently updated to reflect comments received.⁵

3.3 The SA framework

3.3.1 Table 3.1 presents the list of topics/objectives that represents the core of the SA framework. The list of objectives is unchanged from that presented in the Scoping Report (2020), but the SA framework has been adjusted as follows:

- Objectives are placed under broad topic headings (this approach was taken in the 2020 ISA Report).
- ‘Flood risk’ is moved to sit under the ‘climate change adaptation’ topic heading, as flood risk is invariably a key climate change adaptation issue for local plans, whilst other adaptation issues are cross-cutting, in that they can be discussed under other topic headings (e.g. biodiversity, communities).
- The ‘communities’ related topic headings have been grouped together (bar ‘housing’, given that this is a centrally important matter for local plans) to allow for greater flexibility, and ensure a concise appraisal.
- The two objectives relating to ‘the economy and employment’ can appropriately be considered together (as per the approach taken in the 2020 ISA Report). They are distinct objectives, but lend themselves to a single, rounded discussion of the issues, opportunities and impacts.
- ‘Waste’ is moved to sit under the broader heading of ‘land soils and resources’, mindful that minerals and waste is planned for jointly within Oxfordshire, and given that local plans have a relatively limited role to play in respect of sustainable waste management.

3.3.2 Comments on the SA scope are welcomed at the current time. It is important that the SA scope responds to the evolving scope of the plan and reasonable alternatives, and the latest evidence-base. It is also important that the SA framework is conducive to supporting a concise and accessible appraisal.

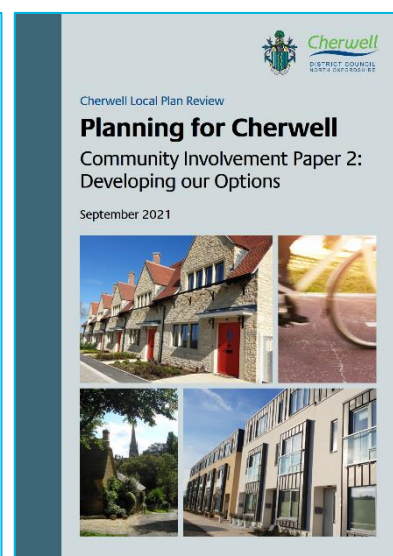
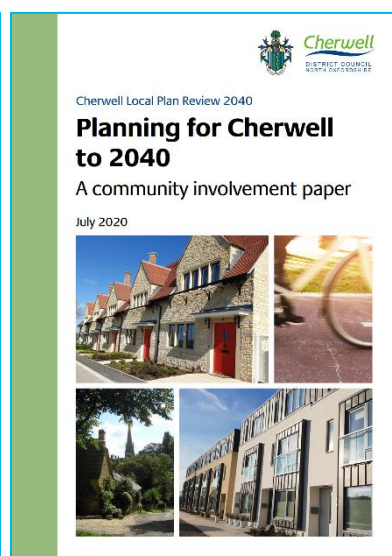
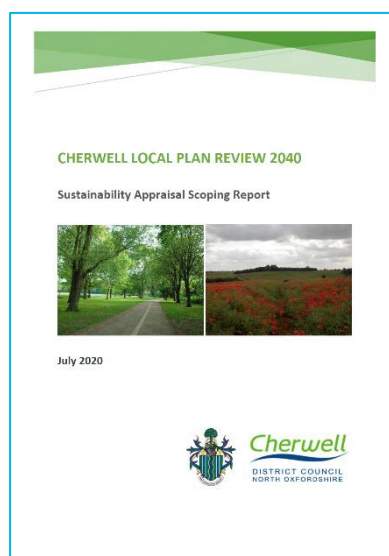
Table 3.1: The SA framework

Topic	Objective
Air and wider environmental quality	Protect and where possible improve air quality and prevent light pollution
Biodiversity	Conserve and enhance the district's biodiversity and geodiversity
Climate change mitigation	Minimise the district's contribution to climate change
Climate change adaptation (flood risk)	Support the district's adaptation to unavoidable climate change Reduce the risk from all sources of flooding

⁴ In-line with Article 6(3) of the SEA Directive, these bodies were selected because *‘by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.’*

⁵ The Scoping Report is available at: www.cherwell.gov.uk/downloads/file/9671/sustainability-appraisal-scoping-report

Topic		Objective
Communities	Communities	Create and sustain vibrant communities including preventing noise pollution
	Crime	Reduce crime and disorder and the fear of crime
	Digital infrastructure	Ensure that digital infrastructure meets the needs of current and future generations
	Education and skills	Maintain and improve levels of education and skills in the population overall
	Health	Improve the health and wellbeing of the population and reduce inequalities in health
	Poverty, disadvantage and social exclusion	Reduce poverty and social exclusion
Employment & economic growth		Ensure high and stable levels of employment across the district Sustain and develop economic growth and innovation and support the long-term competitiveness of the district
Historic environment		Protect, enhance and make accessible for enjoyment, the district's historic environment
Homes		Ensure the opportunity to live in a decent, sustainably constructed and affordable home
Land, soils and resources		Conserve and enhance soil and the efficient use of land Reduce waste generation and disposal, and achieve the sustainable management of waste
Landscape		Protect and enhance landscape character and the district's countryside
Transport		Encourage efficient patterns of movement, promote sustainable travel and reduce the need to travel by car
Water		Maintain and improve water quality and resources



The SA scope was consulted on in 2020, and then subject to minor refinement in 2021

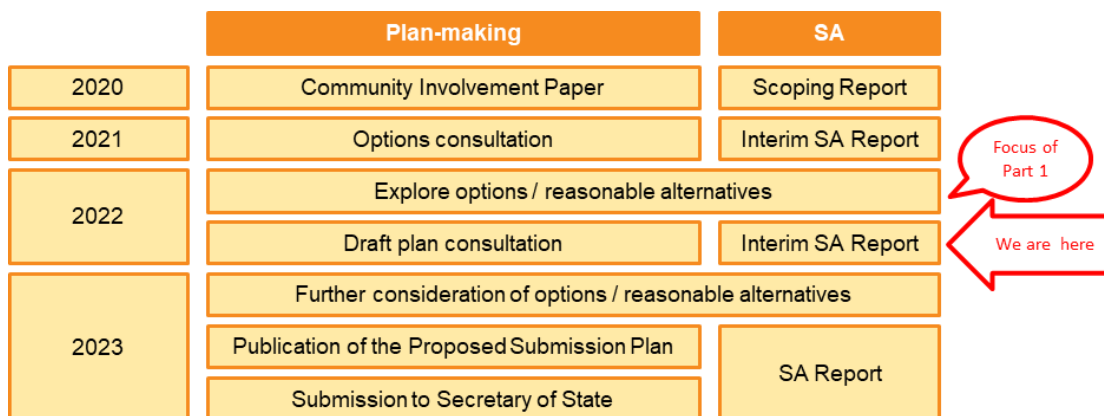
Part 1: What has plan-making / SA involved up to this stage?

4 Introduction to Part 1

Overview

4.1.1 Plan-making has been underway since 2020, with two consultations having been held prior to this current consultation, and one Interim SA Report having been published - see Figure 4.1.

Figure 4.1 Overview of the plan-making / SA process



4.1.2 The focus here, within Part 1, is not to relay the entire 'backstory' of the plan-making /SA process, or to provide a comprehensive audit trail of decision-making over time. Rather, the aim is to report work undertaken to examine **reasonable alternatives** in 2022. Specifically, the aim is to:

- explain the reasons for selecting the alternatives dealt with - see **Section 5**
- present an appraisal of the reasonable alternatives - see **Section 6**
- explain the Council's reasons for selecting the preferred option - see **Section 7**

4.1.3 Presenting this information is in accordance with the regulatory requirement to present an appraisal of 'reasonable alternatives' and 'an outline of the reasons for selecting the alternatives dealt with' within the SA Report (N.B. this is not the SA Report, but aims to present the information required of the SA Report).

What about earlier stages of SA?

4.1.4 A considerable amount of work was completed and published for consultation in the 2021 Interim SA Report, including work to explore reasonable alternatives. Specifically, the report presented an appraisal of broad **growth quanta alternatives** for each of the district's five sub-areas in turn.

4.1.5 Work completed in 2021 was an input to the process of establishing reasonable alternatives in 2022, as discussed below. However, findings of earlier work stages naturally become out-of-date and superseded, such that there is little to be gained from reporting findings in detail.

Reasonable alternatives in relation to what?

4.1.6 The legal requirement is to examine reasonable alternatives (RAs) taking into account the objectives and geographical scope of the plan (see Section 2). Following discussion of plan objectives with officers, it was determined appropriate to focus on reasonable alternatives in the form of '**growth scenarios**', defined as alternative approaches to the supply of land, including by allocating sites (NPPF paragraph 68), in order to meet objectively assessed development needs and wider plan objectives. The aim is to appraise alternatives / scenarios that go to the very core of the plan (see the plan objectives in Section 3), ensuring that decision makers and stakeholders are provided with a clear mutually exclusive choice.⁶

⁶ As well as defining reasonable alternatives mindful of the plan objectives, it was also considered appropriate to focus on 'growth scenarios' given the potential to define 'do something' alternatives that are meaningfully different, in that they will vary in respect of 'significant effects'. The Government's Planning Practice Guidance (PPG) is clear that SA "should only focus on what is needed to assess the likely significant effects of the plan".

What about site options?

- 4.1.7 Whilst individual site options generate a high degree of interest, they are not RAs in the context of most local plans, because there is no mutually exclusive choice to be made between them. Were a local plan setting out to allocate one site, then site options would be RAs, but that is rarely if ever the case. Rather, the objective is invariably to allocate a *package* of sites that taken together, as a ‘strategy’, will serve to meet needs and deliver on wider plan-objectives, e.g. around infrastructure delivery. As such, RAs must be in the form of *alternative packages of sites*. Nonetheless, consideration is naturally given to the merits of site options as part of the process of establishing growth scenarios – see Sections 5.3 and 5.4.

Is the focus on housing sites?

- 4.1.8 Establishing a supply of land to meet housing needs is typically a focus of attention, but local plans are also tasked with meeting wider development needs. This includes needs in respect of employment land, which is a key consideration for Cherwell, as understood from the Oxfordshire Housing and Economic Needs Assessment (HENA, 2022), which explores housing needs under economic growth scenarios.
- 4.1.9 In this light, reasonable growth scenarios for the Cherwell LPR must be defined in terms of both housing and employment land. The discussion presented below is somewhat housing-led, but employment land issues / options are considered throughout, and a summary is presented in Section 5.5.

What about other aspects of the plan?

- 4.1.10 As well as establishing a spatial strategy, allocating sites etc, the local plan must also establish policy on thematic district-wide issues, as well as site-specific policies to guide decision-making at the planning application stage. Broadly speaking, these can be described as development management (DM) policies.
- 4.1.11 However, it is a challenge to establish DM policy alternatives that are genuinely reasonable.⁷ Consideration was given to possible reasonable DM policy alternatives, but on balance it was determined appropriate to focus attention only on appraising the emerging preferred options (see Section 9).
- 4.1.12 Comments on reasonable DM policy alternatives are welcomed through the current consultation.

Structure of this part of the report

- 4.1.13 This part of the report is structured as follows:
- **Section 5** – explains a process leading to the definition of growth scenarios
 - **Section 6** – presents a summary appraisal of the growth scenarios
 - **Section 7** – presents a statement by officers in response to the appraisal.

Whose responsibility?

- 4.1.14 It is important to be clear that: selecting reasonable alternatives is the responsibility of the plan-maker (CDC), with AECOM acting in an advisory capacity; appraising the reasonable alternatives is the responsibility of AECOM; and selecting the preferred option is the responsibility of the plan-maker.

Commenting on this part of the report

- 4.1.15 Comments are particularly welcomed on:
- the decision to focus on ‘growth scenarios’ (**this section**);
 - the growth scenarios selected, with reference to the selection process (**Section 5**);
 - the appraisal of growth scenarios (**Section 6**); and
 - Officers’ response / reasons for supporting the preferred approach (**Section 7**).

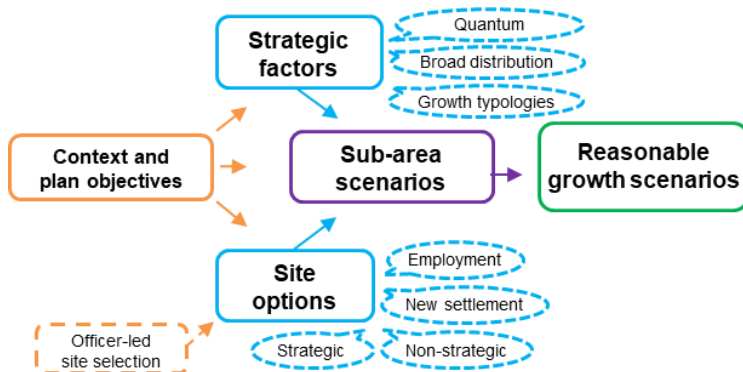
⁷ To be ‘reasonable’ alternatives must be meaningfully different to the extent that it is possible for an appraisal to differentiate between them in terms of significant effects, where significance is defined in the context of the plan as a whole. Also, it is important to bear in mind that ‘no policy’ is not a reasonable alternative to ‘a policy’. This is because ‘no policy’ is the baseline (and so cannot lead to significant effects *on the baseline*).

5 Defining growth scenarios

5.1 Introduction

5.1.1 The aim here is to discuss the process that led to the definition of reasonable growth scenarios.

Figure 5.1: Establishing reasonable growth scenarios



Structure of this section

5.1.2 This section of the report is structured as follows:

- **Section 5.2** – explores strategic factors with a bearing on growth scenarios;
- **Section 5.3** – considers individual site options, as a key input to growth scenarios;
- **Section 5.4** – explores growth scenarios for individual sub-areas within the district; and
- **Section 5.5** – draws upon the preceding sections to define reasonable growth scenarios.

A note on limitations

5.1.3 It is important to emphasise that this section does not aim to present an appraisal of reasonable alternatives. Rather, the aim is to describe the *process* that led to the definition of reasonable alternatives for appraisal. This amounts to a relatively early step in the plan-making process which, in turn, has a bearing on the extent of evidence gathering and analysis that is proportionate, also recalling the legal requirement to present an “*outline of the reasons for selecting alternatives...*” [emphasis added].

5.2 Strategic factors

Introduction

5.2.1 The aim of this section of the report is to explore strategic factors with a bearing on the definition of reasonable growth scenarios. Specifically, this section of the report explores:

- Quantum – how many new homes are needed (regardless of capacity to meet needs in practice)?
- Distribution – which broad areas within the district are more suited and less suited to housing growth; also what development typologies are supported, e.g. strategic versus non-strategic?

Quantum

5.2.2 This section sets out the established Local Housing Need (LHN) figure for the district, before exploring arguments for the Local Plan providing for a quantum of growth either above or below LHN.

Background

5.2.3 A central tenet of plan-making process is the need to **A**) establish housing needs; and then **B**) develop a policy response to those needs. The Planning Practice Guidance (PPG) explains:

“Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from... establishing a housing requirement figure and preparing policies to address this such as site allocations.”

- 5.2.4 With regards to (A), the NPPF (paragraph 61) is clear that establishment of **LHN** should be informed by an *“assessment conducted using the standard method... unless exceptional circumstances justify an alternative approach which also reflects... demographic trends and market signals”* [emphasis added].
- 5.2.5 With regards to (B), many local authorities will respond to assessed LHN by providing for LHN in full or, in other words, setting the housing **requirement** at LHN and identifying a **supply** through policies sufficient to deliver this housing requirement (at a suitable rate/trajectory over time, which will invariably necessitate putting in place a ‘buffer’ to mitigate against the risk of unforeseen delivery issues). However, under certain circumstances it can be appropriate to set a housing requirement that *departs* from LHN.

Cherwell’s LHN

- 5.2.6 A three-step standard method for calculating LHN was first published by the Government in 2017, and then a fourth step (the ‘cities and urban centres uplift’; not relevant to Cherwell) was added in 2020.
- 5.2.7 It is also important to note that the PPG was updated in late 2018 to require that the household growth projections used as an input to the method must be the 2014-based projections, rather than more recent projections. The PPG explains that the change was made in order to:⁸ *“provide stability... ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government’s objective of significantly boosting the supply of homes.”* PPG updates in 2020 confirmed this approach.
- 5.2.8 The Oxfordshire Housing and Economic Needs Assessment (HENA, 2022) considers LHN for Oxfordshire as a whole, before then considering ways of distributing LHN across the county.
- 5.2.9 With regards to Oxfordshire’s LHN, the HENA explores four scenarios:
- “Standard Method 2014” (as above) = 3,388 dpa
 - “CE Baseline Trend” - aims to balance homes and employment on the assumption of a continuation of recent economic trends, as understood from work by Cambridge Econometric, CE = 4,406 dpa
 - “2021 Census Adjusted” - the standard method adjusted to reflect 2021 Census data rather than the 2014-base household projections that are the default basis for the standard method = 4,721 dpa.
 - “Economic Development Led” – aims to balance homes and employment on the assumption of high economic growth in line with that discussed in the LEP’s LIS Investment Plan = 5,830 dpa.⁹
- 5.2.10 The HENA presents an assessment of these four scenarios, concluding that there are good reasons for focusing attention on the two middle scenarios. These two scenarios – which indicate very similar levels of LHN – were then discussed further, leading to an agreement to plan for the CE Baseline Trend scenario, such that Oxfordshire’s LHN is taken to be 4,406 dpa for the purposes of preparing the Cherwell LPR.
- 5.2.11 With regards to the methodological approach to distributing Oxfordshire’s housing need between the five component Oxfordshire local authorities, the HENA considers four alternative approaches:
- 5.2.12 With regards to the methodological approach to distributing Oxfordshire’s housing need between the five component Oxfordshire local authorities, the HENA considers four alternative approaches:
- Distribute according to the standard-method derived LHN figure for each local authority – assuming that the CE Baseline Trend scenario is applied, which leads to an LHN figure for Cherwell of 965 dpa. It is also important to note that Oxford City’s LHN is 991 under this scenario / distribution method.
 - Distribute according to employment in 2021 – assuming that the CE Baseline Trend scenario, this leads to an LHN figure for Cherwell of 949 dpa (i.e. a slight decrease), and Oxford City LHN that is 18% higher.
 - Distribute according to employment in 2040 – assuming that the CE Baseline Trend scenario, this leads to a Cherwell LHN of 1,009 dpa (i.e. a 5% increase on 965 dpa), but notably leads to an Oxford City LHN that is 33% higher (than 991 dpa). Specifically, Oxford City’s LHN is 1,322 dpa.
- 5.2.13 The HENA recommends that the latter distribution is used, such that Cherwell’s LHN is **1,009 dpa**.

⁸ See paragraph 4 and 5 at: [gov.uk/guidance/housing-and-economic-development-needs-assessments](https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments)

⁹ The Oxfordshire Local Enterprise Partnership (LEP) Local Industrial Strategy (LIS) Investment Plan (2020).

Is it reasonable to explore setting the housing requirement at a figure above LHN?

- 5.2.14 The HENA provides a clear evidential basis to inform the Council's identification of LHN, although it is recognised that there are nonetheless arguments for taking forward an alternative figure as LHN. More importantly though, there is a need to consider whether the housing requirement should be set at LHN or at an alternative figure. In particular, in the Cherwell context, there is a need to consider arguments for setting the housing requirement at a figure *above* LHN.
- 5.2.15 Specifically, there is a clear argument for setting the housing requirement at a figure above LHN in order to account for unmet needs from Oxford City, which are significant. This is understood on the basis a Statement of Common Ground agreed between City and Cherwell, which agrees that Cherwell should provide for 5,667 dwellings of Oxford's unmet needs (283 dpa), which amounts to around 32.8%. Accepting this proportion of Oxford City's unmet needs is considered to represent a suitably proactive approach mindful that the Cherwell LPR is progressing ahead of other LPRs. Also, the 32.8% figure is close to the 31% figure that was previously arrived at on the basis of detailed work completed in 2015, and used for the purposes of preparing the Cherwell Partial Review (2020).
- 5.2.16 As such, there is a clear basis for setting the housing requirement at 1,009 dpa + 283 dpa = **1,292 dpa**.
- 5.2.17 Aside from unmet needs, another reason for considering setting the housing requirement above LHN can relate to affordable housing needs, mindful that the Government's Planning Practice Guidance (PPG) states: "*An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.*" This matter is discussed in Section 6.

Is it reasonable to explore setting the housing requirement at a figure below LHN?

- 5.2.18 Paragraph 11 of the NPPF states: "... *strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, **unless**: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*" [emphasis added]
- 5.2.19 In the Cherwell context, there are few arguments for lower growth on the basis of "areas or assets of particular importance". Specifically, whilst part of the district is constrained by the Oxford Green Belt, the majority of the district is not, nor are there any other strategic designations (NPPF footnote 7) that serve to constrain growth across extensive areas.
- 5.2.20 With regards to the possibility of using the Standard Method scenario for calculating LHN, as discussed at paragraph 5.2.9, above, the HENA presents a strong case for this being unreasonable. However, it cannot be discounted entirely. Perhaps more importantly, there are arguments for lower growth to reflect an alternative approach to distributing LHN across Oxfordshire and/or an alternative approach to distributing Oxford City's unmet housing needs. These arguments are explored further in Section 6.

Conclusion on housing quanta options to examine further

- 5.2.21 There is a need to focus attention on growth scenarios involving supply sufficient to enable the housing requirement to be set at **1,292 dpa**, or 25,847 homes in total over the 20 year plan period. However, there is also a need to remain open to the possibility of modestly **higher growth** and **lower growth** scenarios.
- 5.2.22 The question of precise quanta figures to reflect across reasonable growth scenarios is returned to within Section 5.5, subsequent to consideration of broad distribution, site options and sub-area scenarios.

N.B. under any reasonable growth scenario, total supply must exceed the requirement, i.e. there must be a 'supply buffer'. The question of an appropriate supply buffer (e.g. 5 – 15%) is discussed in Section 6.

Broad distribution

Introduction

5.2.23 This is the second of two sections examining ‘strategic factors’ of relevance to the matter of defining reasonable growth scenarios for the LPR. The aim is to explore broad distribution as well as the question of broad growth typologies that are supported, e.g. strategic versus non-strategic sites.

5.2.24 This section might be structured thematically, spatially or chronologically. On balance, a decision was made to structure this section under the following sub-headings:

- Introduction to the spatial context within Cherwell
- Subregional context
- Overarching aims of the local plan review

N.B. there is a very wide range of evidence that might feasibly be reviewed here. The aim here is to present an **introductory discussion**, with other sources of evidence can be reviewed later in the report.

Introduction to the spatial context within Cherwell

5.2.25 An important starting point is an understanding of the distribution of completions and commitments for the period 2011 to 2031, following the adopted Local Plan (2015), the Partial Review (2020) and windfall (including development that has come forward not in accordance with the local plan, under the presumption in favour of sustainable development, due to five year housing land supply issues).

5.2.26 The picture is complex, but current understanding – building on the discussion presented within the Options consultation document (2021; see Table 1 of that document) – is that completions and commitments for the 2011 to 2031 period break down as follows: Banbury – 25%; Bicester – 37%; Kidlington area¹⁰ – 16%; Heyford Park – 9%; Category A Villages¹¹ – 8%; and windfall/district-wide 6%.

5.2.27 In this light, there is a clear basis for exploring five sub-areas within the district: Banbury; Bicester; Kidlington (area); Heyford Park; and the rural area. These areas are discussed below (with a single discussion for Banbury and Bicester in the round), plus there is a brief discussion of the possibility of a new settlement, which would amount to a significant departure from the current growth strategy.

Banbury and Bicester

5.2.28 Both towns have been a focus of growth over recent years and decades. Nonetheless, there is a clear need to explore options that would see a further concentration of growth at both towns.

5.2.29 Banbury is the larger town, but Bicester is growing rapidly (see above), and is associated with a more readily apparent strategic growth opportunity, given its [Garden Town](#) status and position at the intersection of the Oxfordshire Knowledge Spine and the Oxford to Cambridge (Ox Cam) Arc. Bicester also saw significant growth over the decade prior to 2020 (discussed further in Section 5.4); however, Bicester grew by fewer homes than Banbury over this period.

5.2.30 The broad strategy of directing growth to Bicester more so than Banbury remains valid at the current time, i.e. for the purposes of considering reasonable growth scenarios. No ‘headline’ new evidence has emerged, since the time of the adopted Local Plan (2015), to suggest the need for a change of tack; indeed, additional strategic support for a focus of growth at Bicester comes from a range of sources. For example, the Government’s Ox Cam Arc aspirations have emerged since 2015; and Bicester now benefits from an improved rail service (albeit the improvement was envisaged at the time of preparing the adopted plan). It is also the case that the existing and committed employment offer at Bicester is very strong, with six strategic employment sites (Table 1 of the adopted Local Plan) totalling 138.5 ha, in comparison to a total of 48 ha at Banbury. However, take-up of employment land has been primarily for warehousing and distribution uses, reflecting Bicester’s excellent road links, which have a low jobs density. There is an ambition to balance the employment offer more towards knowledge sectors with higher jobs density.

¹⁰ 4,400 dwellings from the Partial Review

¹¹ Includes Kidlington which is a Category A village in Local Plan Part 1

- 5.2.31 In summary, there are a range of high level arguments to support a focus of growth at Bicester over-and-above Banbury (which is not to suggest that there are not important growth-related opportunities at Banbury, perhaps most notably around town centre regeneration, as discussed further below). However, there are also wider factors that must be taken into account when considering more precisely the appropriate balance of growth between the towns – see further discussion in Section 5.4.

Kidlington

- 5.2.32 The Kidlington area is set to see high growth compared to the wider rural area, following the Partial Review (2020), which allocated land for 4,400 homes in the vicinity of Kidlington (although only a proportion directly abuts Kidlington). In this light, and for a range of other reasons, the current proposal is that Kidlington should sit within a second tier of the hierarchy as a ‘service centre’.
- 5.2.33 Kidlington links closely with the surrounding villages of Yarnton and Begbroke, as well as to land within Cherwell at the northern edge of Oxford (between Oxford and Oxford Parkway Station), including land which is now allocated to come forward as an urban extension to Oxford. Also, there is an argument for considering all land falling within the Oxford Green Belt as part of the Kidlington sub-area (including the village of Islip), and potentially also the small area of land between the edge of the Green Belt and the eastern edge of Woodstock (NB: the settlement of Woodstock falls within West Oxfordshire District).
- 5.2.34 Broad strategy was a focus of appraisal and consultation in 2021 (as per Bicester and Banbury). However, the assumption was that there would not be further Green Belt release for housing, given the need to be able to demonstrate ‘exceptional circumstances’, even under a the ‘higher growth’ scenario.
- 5.2.35 Kidlington is very-well linked to Oxford, via bus services along strategic road corridors, and via a strategic cycle route (NCN 51), plus Oxford Parkway Station is nearby. Furthermore, the Kidlington area is a major employment hub, making a major contribution to the success of the Oxfordshire Knowledge Spine. In this light, the option of further strategic growth cannot be ruled out, despite the Green Belt constraint.

Heyford Park

- 5.2.36 The former airbase of RAF Heyford was originally identified as a location for a new settlement in 1996, and by the time of the Local Plan (2015) 761 homes had been consented. The Local Plan (2015) then allocated land for a further 1,600 homes and 1,500 jobs (building on the existing employment offer), through Policy Villages 5, with the Spatial Strategy explaining: *“Away from the two towns, the major single location for growth will be at the former RAF Upper Heyford base which will deliver 2,361 homes.”*
- 5.2.37 The allocation was made mindful of the very high degree of historic environment / heritage constraint affecting the former airfield, which is designated as a conservation area in its entirety.
- 5.2.38 The Options consultation document (2021) then explained: *“To date approximately 680 dwellings have been built, together with associated community facilities... Housing delivery continues to progress at the site, and there is continuing interest in and around the site for additional development.”*
- 5.2.39 The document went on to point out that the Oxfordshire Plan consultation document published in 2021 served to highlight the option of further strategic growth at Heyford Park, and then presented two alternative courses of action: A) limit further growth, beyond that which is committed; and B) allocate land for further strategic growth. These alternatives were then appraised in the Interim SA Report.
- 5.2.40 More recently, an application for 1,750 homes and a range of other uses was approved in 2022 (ref. [18/00825/HYBRID](#)), broadly in line with adopted Local Plan allocation.
- 5.2.41 The adopted Local Plan allocation (2015) discussed the importance of *“a comprehensive and lasting approach to the whole site”* and securing *“a lasting arrangement on this exceptional large scale brownfield site”*. These sentiments hold true at the current time, i.e. there is potentially an opportunity for further growth in order to secure realisation of a vision for Heyford Park as a unique service centre, including one with a high proportion of local jobs per household. However, securing transport infrastructure upgrades, and better alignment with transport objectives more generally, is a prerequisite for further growth.
- 5.2.42 The current proposal is that Heyford Park should sit within the settlement hierarchy as a service centre, alongside Kidlington.

The rural area

5.2.43 There are two categories of villages within the rural area:

- Larger villages – are Adderbury, Ambrosden, Bletchington, Bloxham, Bodicote, Deddington, Hook Norton, Launton, Steeple Aston and Yarnton.

Of these, one village (Bodicote) naturally falls within the 'Banbury sub-area', two (Launton and Ambrosden) within the 'Bicester sub-area' and one (Yarnton) within the 'Kidlington sub-area'. The other seven larger villages are considered under the 'Rural sub-area' heading in Section 5.4.

- Smaller villages – certain smaller villages are best discussed under the Banbury, Bicester or Kidlington sub-area headings in Section 5.4, but the great majority fall under the 'Rural' sub-area heading.

5.2.44 This broad area has seen significant recent growth, and there is significant committed growth in place. This includes significant growth from 'speculative' sites that have recently gained planning permission at appeal, following a refusal by CDC, after weight being given to the lack of a demonstrable five year housing land supply (as measured against the housing requirement set out in the adopted local plan).

5.2.45 Overall, it is difficult to reach a conclusion on whether there is a strategic argument for increasing the proportion of district-wide growth directed to the rural area, through the LPR. On the one hand, recently completed and committed growth amounts to a rate of growth above that envisaged by the adopted Local Plan.¹² However, on the other hand the strategy in the adopted plan amounted to a limited or modest growth strategy. On balance, the option of modestly raising the proportion of district-wide growth directed to the rural area cannot be ruled out as unreasonable (on the basis solely of strategic arguments).

5.2.46 This is mindful of strategic arguments around supporting the vitality of rural villages, including by ensuring sustainable levels of patronage for village services / facilities and retail. However, it is recognised that there are also strategic transport arguments against dispersing growth to rural areas. Also, it is recognised that growth issues and opportunities vary greatly from village-to-village, plus there is a need to consider the role of neighbourhood plans. The rural area is discussed further below, in Section 5.4.

New settlements

5.2.47 Finally, with regards to the existing strategy, there is a need to consider the matter of new settlements. The adopted Local Plan supported a new community at Heyford Park, but that represented something of a unique opportunity, as discussed. The NPPF encourages consideration of new settlements (para 73), and several options were explored when preparing the Partial Review (2020). Also, it is noted that all four of the other adopted Oxfordshire local plans include a focus on new settlements.¹³

5.2.48 As such, it is reasonable to consider new settlement options further, despite the fact that allocation of a new settlement would represent a significant departure from the current strategy. Options are discussed in Sections 5.4 and 5.4.

Subregional context

5.2.49 The discussion above has already served to introduce a number of the 'larger-than-local' reasons for giving careful consideration to the scale, distribution and types of growth supported through the local plan. Key objectives relate to supporting economic growth, but there are also a range of wider objectives with a bearing on the question of how to distribute growth optimally, within the sub-region and within Cherwell.

5.2.50 The following is a review of select key sub-regional strategies.

Oxford-Cambridge Arc Spatial Framework

5.2.51 In July 2021, the Government consulted on a 'vision' for the Arc, with the consultation document anticipating subsequent consultation on a 'spatial framework' in 2022. However, there is yet to be any consultation on a spatial framework, and the future of the initiative is currently unclear.

¹² Specifically, Policy Villages 2 stated: "A total of 750 homes will be delivered at Category A villages. This will be in addition to the rural allowance for small site 'windfalls' and planning permissions for 10 or more dwellings as at 31 March 2014."

¹³ The West Oxfordshire Local Plan (2018) directs a high proportion of growth to "Oxfordshire Cotswolds Garden Village" (2,200 homes), albeit the new village will be very closely linked to Eynsham; the South Oxfordshire Local Plan supports a stand-alone new settlement at Culham (3,500 homes) as well as two strategic village expansions (Chalgrove, 3,00 homes; and Berinsfield, 1,700 homes); whilst the Vale of White Horse Local Plan (Part 2 adopted in 2019) supports a new garden village at Dalton Barracks (up to 4,500 homes in the long term), albeit the site relates very closely to the existing village of Shippon.

5.2.52 Key figures within the [Vision document](#) deal with:

- **Productivity** – Figure 3.1 of the document shows that Gross Value Added (GVA) per capita is very high compared to the national picture and select other sub-regions nationally. The ambition is that: “*By 2050, the Arc will be the world leading place for high-value growth, innovation and productivity.*”
- **Economic clusters** – Figure 3.2 in the document shows the location of hubs for a range of key sectors, with the Oxfordshire Knowledge Spine clearly evident. Bicester is not explicitly shown, but it is important to note the level of committed employment growth: 119 ha as of 2021.
- **Transport** – Figure 4.1 serves to clearly highlight a gap in east-west connectivity in the western part of the Arc, although this is set to improve, with the Oxford to Bletchley section of East-West Rail currently under construction. Poor connectivity is barrier to growth, and leads to problematic traffic congestion along certain road corridors, including the A34 corridor, with implications for safety and bus services.

5.2.53 As well as an economic growth opportunity, the inherent characteristics of the Arc suggest an **environmental opportunity**. The Arc is broadly associated with a vale landscape associated with two great river systems – the Thames draining to the Channel and the Great Ouse / Cam / Nene draining to the Fens and then the Wash – bounded to the north and south by sensitive raised land (the Chilterns / Anglian Chalk to the south; and the Cotswolds / Northamptonshire Uplands / Rockingham Forest to the north). Within this vale landscape, in addition to the river corridors – which are highly valued and sensitive from a very wide range of perspectives – a key defining feature is a series of three mid-vale ridges, associated with valued habitats (notably ancient woodland, including royal hunting forest) and historic environment assets. In this light, there is a clear opportunity to develop and implement a vision that sees the Arc develop as one of the key national bio-regions, with clear goals set around biodiversity / nature recovery and wide ranging ecosystem service provision, including relating to historic character / sense of place. In Cherwell, this translates as a need to recognise the Ox Cam Arc-wide strategic importance of the two key Thames tributaries – the Cherwell and the Ray – with perhaps the primary consideration being the Upper Ray Meadows, including Otmoor, and close links between this area and the Bernwood Forest.

[England's Economic Heartland](#)

5.2.54 England's Economic Heartland (EEH) is a partnership of councils and local enterprise partners, focused on coordinating investment in strategic infrastructure, particularly **transport infrastructure**. The EEH Regional Transport Strategy (2021) describes a “once in a generation opportunity” to:

- Improve the resilience of a transport system that is already under strain; one where congestion and unreliability acts as a brake on sustainable growth;
- Reduce reliance on the private car in a region where average journeys are longer, and car use higher than the national average;
- Address the carbon impact of the transport system, where emissions are currently higher and growing faster than the national average;
- Support rural communities and businesses, a demographic much larger than the national average; and
- More widely, address the extent to which poor transport connectivity serves to perpetuate inequality.

5.2.55 The next stage of the Regional Transport Strategy will involve a series of Connectivity Studies for key corridors, with Cherwell intersecting three of the ten: the M40 corridor; the Oxford to Milton Keynes corridor; and the Peterborough – Northampton – Oxford corridor.

5.2.56 EEH has also recently published:

- a decarbonisation [roadmap](#), which serves to highlight that Cherwell is notable for high per capita emissions from transport, but a low proportion of transport emissions from commuting (although this trend may reflect the fact that Cherwell is crossed by two major components of the strategic road network, namely the M40 and the A34); and
- strategies for both bus and active travel. With regards to the active travel strategy, this notably presents a review of Local Cycling and Walking Implementation Plans (LCWIPs) across the area. In Cherwell LCWIPs have been completed for Bicester and Kidlington, and Banbury's is in preparation.

Figure 5.2: England's Economic Heartland in the national context



Oxfordshire Local Enterprise Partnership (OxLEP)

5.2.57 OxLEP is very active, having produced a Strategic Economic Plan in 2016, a Local Industrial Strategy (LIS) in 2019 and several more recent publications, including a LIS Investment Plan in 2020 and a Net Zero report in 2021. The following, from the LIS Investment Strategy, is a helpful summary of the ambition:

“Oxfordshire has one of the highest concentration of innovation assets in the world with universities, and science, technology and business parks at the forefront of global innovation in transformative technologies and sectors such as Fusion Technology, Autonomous Vehicles, Quantum Computing, Cryogenics, Space, Life Sciences, and Digital Health. Together, they provide a rich and economically critical network of employment, R&D and creative nodes which offer significant opportunities to scale-up, develop new products and services, so enabling the UK to compete on the international stage in new exciting markets.”

5.2.58 Within the LIS, [Figure 6](#) presents six principles underpinning the ambition to ‘build a world leading innovation ecosystem’, with the following of particular relevance to the current task:

- Liveable place – there is a need to meet housing needs and focus on ‘place’;
- Keystone assets – key economic assets are discussed further below; and
- Talent proposition– amongst other things, schools capacity is a key consideration.

5.2.59 Elsewhere, the LIS Investment Plan explains: “Oxfordshire’s Local Industrial Strategy is built around the five pillars of Ideas, People, Business Environment, Infrastructure, and Place.” Investment priorities are then placed in a series spatial ‘bundles’, which can be seen in Figure 5.3. Bundles of key relevance are:

- **Begbroke Science Park** (investment bundle 1) – the Plan describes a “wider A44 corridor vision to double capacity at Begbroke including new station & linking to Oxford Airport & Oxford Parkway.” However, the timetable for both the A44 Rapid Transit Line and Begbroke Station schemes is uncertain.
- **Living labs testbest** (investment bundle 2) – there is support for “smart living pilots at scale using emerging technologies integrated into major housing development to tackle Grand Challenges.” As well as a focus on Bicester, there is also a focus on Heyford and the “Banbury Industrial Zone”.
- **Motorsport Valley** (investment bundle 4) – this applies to both Bicester and Banbury.
- **Upper Heyford Creative City** (investment bundle 5) – discussed further in Section 5.4.

5.2.60 With regards to the OxLEP Net Zero Pathways report (2021), this is a key consideration for the task of arriving at, and then appraising, reasonable growth scenarios. It is discussed further below.

Figure 5.3: Priority investment bundles from the LIS Investment Plan

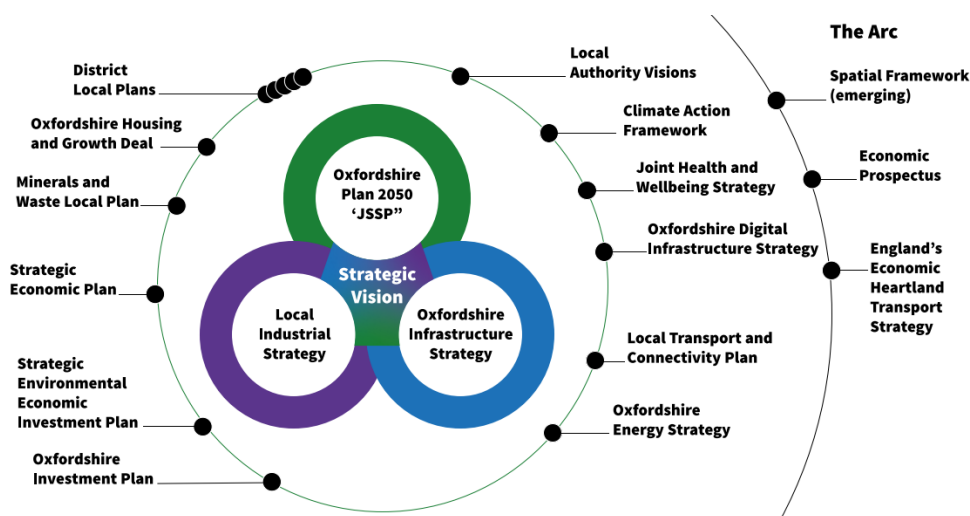


The Oxfordshire Plan

5.2.61 Despite the plan no longer being progressed, work to develop a strategic [vision](#) for the County remains relevant, as does the definition of ‘good growth’ in the Oxfordshire context. Also, there is a need to recall why an Oxfordshire Plan was seen as necessary, including around realising transformational opportunities, perhaps most notably in terms of infrastructure delivery. Coordinated planning across Oxfordshire is now the focus of the [Future Oxford Partnership](#), including with the following stated aims:

- Coordinate local efforts to manage economic, housing and infrastructure development in a way that is inclusive and maximises local social and environmental benefits.
- Support the development of local planning policy that meets the UK Government’s stated aim of net zero carbon by 2050, and contributes towards biodiversity gain whilst embracing the changes needed for a low carbon world.

Figure 5.4: The Oxfordshire strategic planning context, prior to a decision not to progress the JSSP



5.2.62 There is also a need to consider the three stages of work to explore spatial strategy options:

- Growth typologies – a consultation in 2019 presented seven typologies, including urban intensification, new settlements, growth clusters and growth along transport corridors. In practice, there is a clear need to remain open minded to all seven of the growth typologies in the Cherwell context.
- Refined typologies – work in 2020 explored typologies with added spatial definition. Notable typologies included a focus on: strategic road junctions; new settlements with new strategic transport connections; and broad locations shown to have least environmental value and/or most opportunity for enhancement.
- Spatial strategy options – five (again, not entirely mutually exclusive) options were a focus of the 2021 consultation, namely: 1) Focus on opportunities at larger settlements and planned growth locations; 2) Focus on Oxford-led growth; 3) Focus on opportunities in sustainable transport corridors & at strategic transport hubs; 4) Focus on strengthening business locations; 5) Focus on supporting rural communities.

5.2.63 Implications of this work for Cherwell local plan reasonable growth scenarios (albeit with limited weight / importance, given that the Oxfordshire Plan is not being progressed) include:

- **New settlements** – none of the 2021 options suggested a particular focus on new settlements (beyond those already ‘planned for’, e.g. Heyford Park). However, new settlements could have formed part of the strategy under certain options, most notably Option 4 (sustainable transport corridors). Oxfordshire Plan work serves to highlight the possibility of considering new settlement options well-linked to Oxford or along sustainable transport corridors, but no detailed areas of search were identified.
- **Focus on Oxford** – serves as a reason to remain open to the possibility of exploring whether exceptional circumstances exist to justify Green Belt release, plus the discussion under several of the other options lends support for considering the possibility of further growth in the Kidlington area. However, it is noted that Option 2 from the 2021 consultation (Focus on Oxford) received the fewest statements of support, and the most objections, through the consultation.
- **Heyford Park** – is discussed as a potential location for further strategic growth under Options 1 and 4, but is less suited from a perspective of seeking an Oxford and sustainable transport corridors focus.

Overarching aims of the local plan review

5.2.64 Finally, set out below is a discussion of broad distribution issues / opportunities in respect of the three Cherwell LPR ‘overarching themes’ in turn.

Maintaining and developing a sustainable local economy

5.2.65 Strategic housing growth directed to existing settlements could be supportive of economic objectives, mindful of notably different ‘offers’ (e.g. knowledge and creative sectors at Kidlington and Upper Heyford; automotive sectors and traditional industry at Banbury) and established objectives (e.g. the need to diversify the employment offer at Bicester, away from a dominance of warehousing).

5.2.66 However, the opportunity at Banbury is considered to be *relatively* low, in comparison to the other three settlements. A key opportunity for Banbury is in respect of town centre regeneration, which is a matter with relatively limited bearing on defining reasonable growth scenarios at the current time.

5.2.67 There is also a need to be mindful that housing growth directed to existing settlements can risk tensions with economic objectives, e.g. due to increased traffic or conflicts with place-making objectives.

Meeting the challenge of climate change and ensuring sustainable development

5.2.68 A key Oxfordshire-wide [Pathways to Zero Carbon](#) report (2021) presents a range of key messages of relevance to the task of arriving at reasonable growth scenarios for the Cherwell LPR, notably around:

- **Transport** – broad distribution issues and opportunities are relatively well understood, with a need to direct growth to the most accessible and well-connected locations, support investment in sustainable transport corridors / strategic transport infrastructure and recognise that growth at scale can lead to opportunities, including around supporting trip internalisation and high rates of walking and cycling.

Directing growth to rural villages is generally not supported from a transport decarbonisation perspective. For example, recent work to appraise 48 scenarios for the Greater Cambridge served to highlight a spatial strategy of supporting growth at villages as performing very poorly – see Option 5 in Figure 5.5.

- **Built environment** – relevant issues / opportunities are less well-understood. Considerations include:
 - The potential to require and achieve ‘operational emissions’ standards that go beyond the requirements of Building Regulations is heavily dependent on development viability which, in turn, relates to spatial strategy and site selection, and can lead to a clear argument for economies of scale.
 - Certain sites can be associated with a particular locational or scheme-specific opportunity, in terms of minimising operational emissions, notably in respect of supporting district-scale heat networks.
 - Minimising non-operational emissions, including from embodied carbon, is increasingly a focus of attention nationally, with a need to support ‘modern methods of construction’, including modular buildings, which can serve as an argument in favour of strategic growth locations / concentrations.
- **Low carbon innovation** – as discussed above, there is a need to support knowledge and high tech economy hubs, and also new / growing communities as ‘living labs’. For example, North West Bicester eco-town ([Elmsbrook](#)) has recently been discussed widely as a national low carbon exemplar.
- **Strategic renewables** – typically means solar farms, in the Oxfordshire context. This is less relevant to spatial strategy and site selection, recalling that schemes typically feed into the national grid (such that there is not necessarily a benefit to bringing schemes forward as part of strategic development).
- **Land use and carbon sequestration** – there is naturally a need to take account of the full range of ‘ecosystem services’ provided by areas of habitat that might be impacted by development; however, the carbon sequestration role of habitats is not likely to be a primary consideration in the Cherwell context. With regards to tree-planting, or other habitat creation aimed at carbon sequestration, it is important not to focus overly on ‘mitigating’ emissions in this way, at the risk of a reduced focus on avoiding emissions in the first instance, plus there is a need to ensure the right type of tree planting in the right locations.

5.2.69 Overall, the Pathways to Net Zero report is clear that there is a need for **a very high level of ambition**, and this must translate into spatial strategy and site selection. Many decarbonisation opportunities can be foreclosed without early, strategic consideration at the local plan-making stage of the planning process.

5.2.70 The necessary level of ambition is evident from Cherwell’s ambition to achieve district-wide **net zero by 2030** (which is [more ambitious](#) than four of the other Oxfordshire authorities). Net zero by 2030 may well not be achievable (see Figure 5.7), but the necessary level of ambition is clear nonetheless.

Figure 5.5: Emissions scenarios to inform the Greater Cambridge Plan (Etude & Bioregional, 2021)

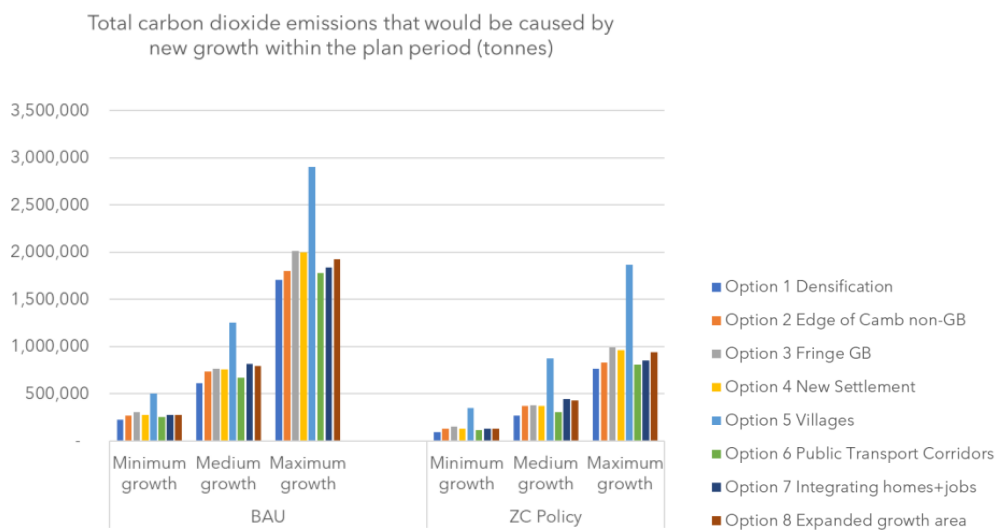


Figure 5.6: An infographic from the Pathways to Net Zero report (2021)

Shattering myths

“We should plant trees to offset our emissions”	“We need a more skilled & qualified workforce”	“Electric vehicles are coming to save us”	“Net-zero can be achieved by 2030”	“Fossil fuels are needed for economic growth”	“It all comes down to individual behaviours”
... we need to protect existing trees, but planting new trees can remove only a small fraction of current emissions, and we need to restore a mix of native ecosystems to reverse biodiversity loss.	... the skills challenge is not just a supply problem, we also need demand for skills, driven by markets for zero-carbon solutions.	... switching to cleaner fuels is insufficient for net-zero. We also need to reduce our transport demand and complete more of our journeys by walking, cycling, public and shared transport.	... without relying on offsets, the scale of investment, technological and lifestyle change, without national policy support, is unrealistic.	... renewable energy and other zero-carbon solutions represent opportunities for more efficient use of resources. Unlike spending on fossil fuels, investment can be kept local.	... while lifestyle change and sustainable choices will be crucial, these are influenced by infrastructures, systems of provision and social norms. Reshaping these requires action from myriad actors

Building healthy and sustainable communities

5.2.71 Key considerations relate to:

- **Housing needs** - in the knowledge that there will be needs associated with specific settlements. The implications of unmet needs from Oxford for the consideration of growth locations are quite well understood; however, locally arising needs from elsewhere (e.g. Banbury) are more difficult to pinpoint.

With regards to affordable housing needs, a primary consideration is the need to support development locations / schemes where viability is likely to be strong. This can serve as a reason for supporting strategic growth locations (subject to consideration of infrastructure costs), as well as a degree of geographic dispersal and a variety of sites, such that there is variety of ‘housing products’ on the market.

More generally, a diversity of housing sites, in terms of geographical location and type, is important from a perspective of ensuring a robust housing supply trajectory, i.e. avoiding unanticipated drops in supply.

- **Community infrastructure** – there are no known ‘headline’ opportunities to be addressed, e.g. directing growth so as to deliver a new secondary school to help address an existing need. However, clearly there is a need to direct growth so as to avoid overburdening existing community infrastructure, and there is clear merit to schemes that will deliver new community infrastructure capacity alongside housing, particularly where the effect will be to also benefit the existing community (‘planning gain’). Supporting [20 minute neighbourhoods](#), where possible, is an important objective.

- **Traffic congestion** – is an issue perhaps most notably at Banbury, where the great majority of traffic enters and leaves the town via the A422 Hennef Way, leading to implications for functioning of junctions along the road, including Junction 11 of the M40. The Air Quality Management Area (AQMA) along Hennef Way is understood to be associated with some of the worst levels of pollution in Oxfordshire.
- **Place-making** – many lessons on good place-making have been learned over recent years locally, perhaps most notably through planning for strategic growth at Bicester, in line with its status as a national Garden Town and Healthy New Town. Heyford Park is potentially a location where there is a need for further intervention, potentially to include strategic growth, in support of place-making.

It is also clearly the case that place-making objectives – alongside wide-ranging other objectives – serve as a reason for supporting town centre regeneration schemes, with the Options consultation document (2021) including a particular focus on Banbury Canalside, and the subsequent [Town Centres and Retail Study \(2021\)](#) identifying a series of development opportunities within all three of the top tier urban areas. However, supply from such sites is often challenging to bring forward / associated with delivery risk. There will be potential to explore urban capacity in more detail subsequent to the current consultation.

Conclusion on broad distribution issues / options

5.2.72 On the basis of the discussion above, the following key messages emerge:

- There is a strong argument for *broadly* rolling forward the existing strategy, particularly the strategy of directing a high proportion of growth **Bicester** and **Banbury**, and to Bicester in particular.
- There are strategic arguments in support of growth in the **Kidlington** sub-area and at **Heyford Park**; however, it is difficult to reach a broad conclusion on scale at this stage in the process (see Section 5.4).
- There are limited strategic arguments in support of a **new settlement** (beyond Heyford Park). However, the option cannot be ruled out at this stage in the process (again, see further discussion in Section 5.4).
- There are limited strategic arguments for dispersing growth to the **rural area**, although consideration might be given to a limited boost to the rate of growth, in so far as sustainability considerations allow.
- In light of the recent Cherwell experiences, and also mindful of the Oxfordshire context (e.g. support for 'living labs' and decarbonisation ambition) there is support for **strategic growth locations**. However, there is a need to carefully consider place-making objectives (e.g. avoiding 'sprawl'), and there are also clear arguments for **a mix of sites**, in terms of geographical spread and size / type.
- There are myriad **other strategic factors** that must feed-in to work to establish reasonable growth scenarios, e.g. maximising urban supply, avoiding environmental constraints / realising environmental opportunities, climate change adaptation and Green Belt protection. These factors all feed-in below.
- The discussion in this section has focused on broad distribution issues / options in respect of housing growth, but there are also significant considerations in respect of **employment land** – see Box 5.1.

Box 5.1: Employment land broad strategy issues / opportunities / options

Any sites in contention for an employment allocation must align with broad distribution objectives, notably around: transport connectivity (particularly connectivity to the M40, A34 and A41); 'sustainable transport' connectivity; and supporting strategic employment agglomerations and spatial concepts (Oxfordshire Knowledge Spine, Banbury Industrial Zone, Motorsport Valley, Heyford Creative City). Furthermore:

- Bicester - there is a need to balance high demand for warehousing/distribution with strategic objectives around boosting the offer of higher value employment aligned with the Oxfordshire Knowledge Spine.
- Kidlington - there is certainly a growth opportunity, particularly in the Research and Design (R&D) sector, given a relatively central location in the Oxford Knowledge Spine; however, the Green Belt is a constraint.
- Heyford Park - there is a need to support enhanced efforts to invest in the sensitive refurbishment and repurposing of existing buildings within the conservation area. There is also a need to be mindful of nearby M40 Junction 10, where there are currently two large-scale speculative employment applications.
- Banbury - perhaps the primary opportunity is in respect of making best use of brownfield land within the urban area; however, land is also being promoted for significant employment growth to the east of the M40.
- Rural area - engagement with the local businesses, including through the Employment Land Review (2021) has served to highlight the importance of smaller employment sites, including within the rural area, with a view to supporting businesses not suited to strategic sites, ensuring they can grow and relocate if necessary. As such, allocation of non-strategic sites will be considered subsequent to the current consultation.

5.3 Site options

5.3.1 This section considers:

- A key starting assumption; and
- The site selection process led by CDC that led to a shortlist of site options.

Starting assumption

5.3.2 In 2022 it was determined appropriate for the Regulation 18 draft plan to focus attention on ‘**strategic**’ **allocations**, defined as sites in excess of 3 ha in size (considered to represent a very conservative definition of what is ‘strategic’; others might consider a 3ha site simply a ‘medium’ sized site). This was with a view to expediting the plan-making process, and in the knowledge that supply from non-strategic sites (including via neighbourhood plans) can be considered subsequent to the current consultation.

Identifying strategic site options

5.3.3 A starting point was the Housing and Employment Land Availability Assessment (**HELAA**), prepared in line with NPPF paragraph 68. The HELAA identifies a large number of sites that are available, achievable and potentially suitable for allocation, classifying each as either ‘deliverable’ (could come forward within five years) or ‘developable’ (could come forward later in the plan period).

5.3.4 From the HELAA, there was then a need to identify potential **strategic site options** reasonably in contention for allocation within the draft plan. Strategic site options might comprise either a single HELAA site or a cluster of HELAA sites, and must be suitably well-linked to one of the four higher order settlements (see Figure 5.7). The process of identifying strategic site options was led by CDC officers.

5.3.5 Ultimately a long list of 63 potential strategic site options, known as **LPR sites**, was established – see Figure 5.8. These sites – plus select other sites – are all discussed further in Section 5.4.

Figure 5.7: Well-connected locations in proximity to a higher order settlement

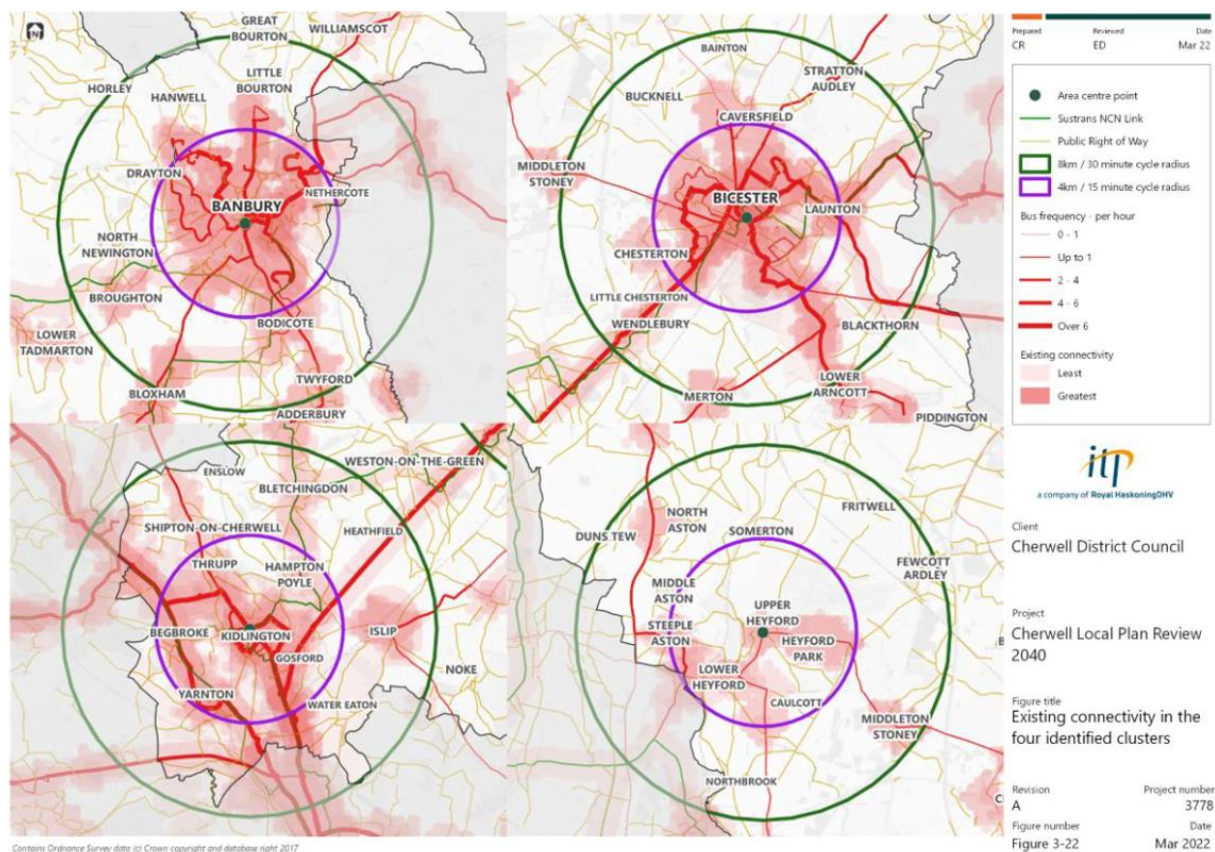
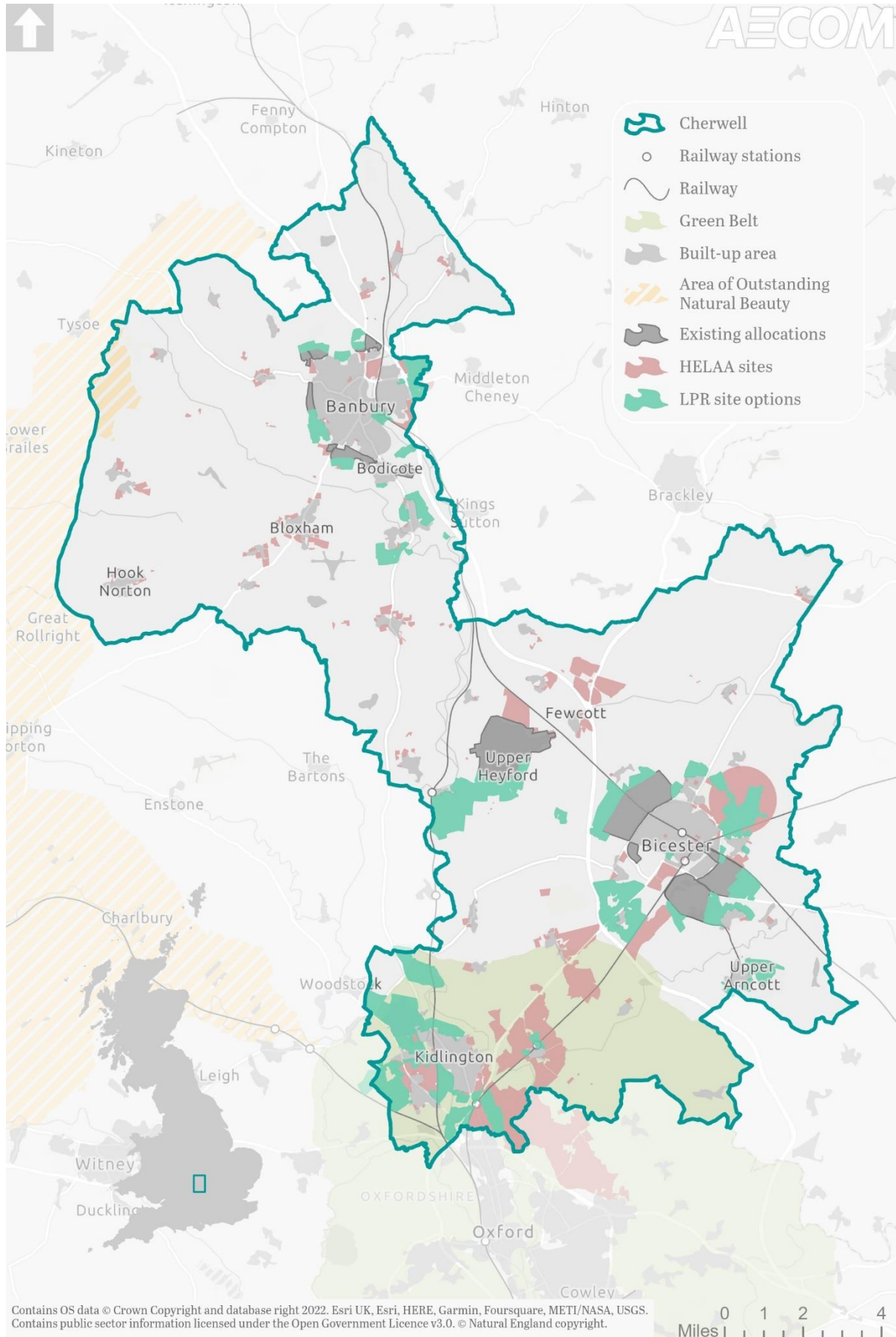


Figure 5.8: Site options that fed-into the process of defining growth scenarios, plus HELAA sites for context



5.4 Settlement scenarios

Introduction

5.4.1 Discussion has so far focused on A) 'top down' consideration of housing quantum and broad distribution; and B) 'bottom-up' consideration of site options. The next step is to consider each of the district's sub-areas in turn, exploring how sites might be allocated in combination, or 'sub-area scenarios'.

What sub-areas?

5.4.2 There are four quite well established sub-areas for the purposes of preparing the LPR, which have already been introduced above, in Section 5.2. These are:

- Banbury;
- Bicester
- Kidlington;
- Heyford Park; and
- the rural area.

5.4.3 It is recognised that the sub-areas must be defined loosely, particularly in respect of villages linked closely to a higher order settlement. Also, it is recognised that ongoing consideration must be given to the possibility of sub-dividing sub-areas, where it is the case that a particular location within a sub-area is associated with particular issues or opportunities, in the context of defining growth scenarios.

Methodology

5.4.4 For each sub-area informal consideration is given to reasonable alternative approaches that might be taken to allocation ('growth scenarios'), mindful of site specific, sub-area-specific and district-wide strategic considerations. The focus is on the 63 LPR sites plus select other sites.

5.4.5 The ultimate aim is to reach a conclusion on the sub-area-specific scenarios that reasonably need to be taken forward to Section 5.5, where sub-area scenarios are combined in order to arrive at district-wide scenarios. The aim is *not* to present a formal appraisal of reasonable alternatives.

5.4.6 Accordingly, the discussions are systematic only up to a point. The aim is not to discuss all site options to precisely the same level of detail, but rather to focus attention on those site options *judged* to be a more marginal, i.e. where the question of whether or not to take the site forward is more finely balanced, mindful of site specific, settlement specific and district-wide strategic considerations.

5.4.7 This approach is taken mindful of the legal requirement, which is to explain reasons for arriving at reasonable alternatives in "outline" terms, and given that individual site options are not reasonable alternatives (as discussed in Section 4). Views on the approach taken and the outcomes of the work are welcomed, including suggestions around possible sub-area specific reasonable alternatives.

N.B. it is important to reiterate that those sites 'progressed' to Section 5.5 are then explored in more detail.

Banbury

5.4.8 As per the discussion in Section 5.2, Banbury is associated with *relatively* limited growth opportunity, in comparison to Bicester, and there are significant constraints to growth. However, there is nonetheless a clear need to direct a reasonable proportion of growth to Banbury, as the district's largest town.

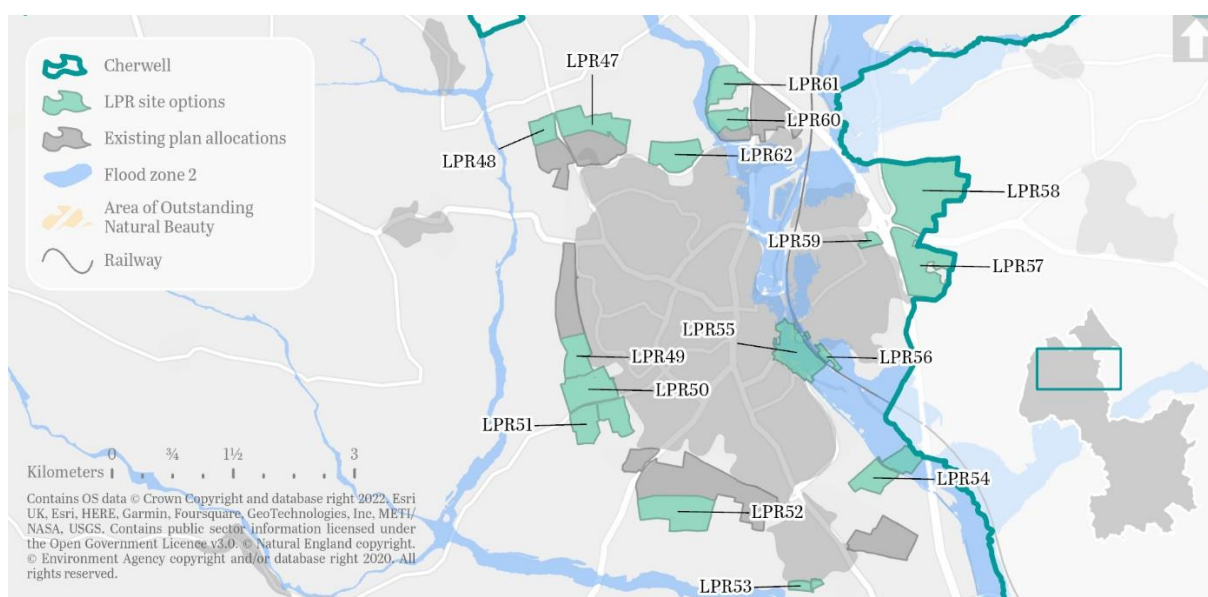
5.4.9 With regards to spatial strategy, an important starting point is the linked topics of topography, landscape, built form and historic character. The valued historic core is associated with the River Cherwell valley and the associated Oxford Canal corridor, with directions / potential directions of growth as follows:

- West (including northwest / southwest) – this is the primary direction of 20th and early 21st century residential expansion. There is a clear argument for seeking to retain containment within the Cherwell valley, avoiding the town's built form 'spilling' into the valley of the Sor Brook.

- East – the Grimsbury residential neighbourhood was an early area of expansion, in the late 19th century and early 20th century. This was then followed by the M40 in the second half of the 20th Century, and it is now the case that industrial areas ('Banbury Industrial Zone') have expanded as far as the motorway. There is a strong argument for drawing upon the motorway for the purposes of containment, also mindful of the district's boundary with West Northamptonshire. However, on the other hand, there are certain arguments for (further) employment land east of the motorway, given the importance of road connectivity.
- North – the key defining feature is the River Cherwell / Oxford Canal / Railway corridor and associated valley topography. A series of industrial areas came forward in the late 20th Century, followed by two residential neighbourhoods more recently: one to the west that is quite well-contained in landscape / topography terms; and one to the east (most recently, following a local plan allocation), which is well-contained by the M40. There is one further modest committed site, which has permission for 90 homes.
- South – again, a key defining feature is the river / transport corridor and valley, plus there is the village of Bodicote, associated with raised ground to the west, which has expanded significantly beyond its historic core. This area has been a focus of recent growth, plus there is extensive committed growth.
- Adderbury – is located some way to the south of Banbury (a circa 30-minute cycle distance; see Figure 5.8, also mindful of topography), albeit there is relatively good bus connectivity, with the Transport Assessment, 2022, identifying the A4260 south of Banbury as the highest quality road corridor in the Banbury area. There is also a need to consider road traffic, given that the village is near equidistant between M40 junctions. Adderbury is a historic village associated with the Sor Brook, and also the former railway line to Chipping Norton / Cheltenham. There is an extensive conservation area with a large number of listed buildings (it was historically a much larger village than Bodicote), with the village having expanded to the north in the 20th Century (Twyford), before more recent expansion to the southwest; however, recent and committed growth is relatively low. There are a number of sizeable HELAA sites, such that there is feasibly the potential for strategic growth, particularly at Twyford. However, this option is **ruled-out** on balance (such that options are not discussed further). This is because of the number of sequentially preferable locations for growth district-wide, including at villages more closely linked to a higher order settlement (Bodicote, Chesterton, Ambrosden, Launton).

5.4.10 Finally, there is a need to note town centre housing growth opportunities over-and-above Bicester, with an identified opportunity for regeneration. Canalside is a key strategic site, adjacent to the town centre, which is discussed below as an option for allocation. However, there are several other town centre opportunity sites as discussed within the Town Centre and Retail Study (2021), which concludes a need to prepare a town centre masterplan in order to “ensure a comprehensive strategy and delivery.” In turn, there is a need to be mindful that additional town centre housing supply could be identified prior to plan finalisation.

Figure 5.9: Strategic site options at Banbury



5.4.11 From Figure 5.9, an immediate point to note is the two adjacent strategic site options located close to the **town centre**. Both are existing allocations within the adopted local plan that have not delivered to date, but where the principle of redevelopment remains strongly supported. The latest situation is that:

- **LPR55** (Canalside) - is allocated for 700 homes in the adopted local plan, but is now being reconsidered, including in light of the Options consultation (2021). The proposal is no longer to expand the town centre into the site, given a need to consolidate the town centre, and the proposal is now to have a clearer distinction between housing and community uses to the west of the river and employment uses to the east, as well as a stronger focus on green / blue infrastructure. The proposal is now for 500 homes, although this is still subject to further review given the extent of flood risk affecting the site.
- **LPR56** (Higham Way) - is now considered suitable for employment, having previously been allocated to deliver 150 homes. This site is also affected by flood risk, but employment is a lower risk land use.

5.4.12 The remaining strategic site options form a number of clusters. Beginning with sites to the **north**, most of these sites are all judged to perform relatively poorly. Specific comments are as follows:

- **LPR62** – the Landscape Sensitivity Assessment (henceforth ‘Landscape Study’, 2022) considers a large parcel of land (BAN14) stretching from land south of Hanwell in the west to the Hanwell Brook in the east. The land slopes significantly from west to east (towards the brook), such that there are long distance views. For this reason, and due to the nearby Hanwell Conservation Area, the study assigns an overall ‘medium-high’ sensitivity rating, such that it can be considered relatively sensitive in landscape terms. There is little reason to suggest this sensitivity score would not apply to LPR62 (which comprises more than 1/3 of BAN14), plus land here is equidistant between strategic road corridors. A primary school is near adjacent, but there is a clear argument for avoiding expansion north of Dukes Meadow Drive in this area. There is a planning application for 78 homes on part of the site (ref. [21/03426/OUT](#)).
- **LPR60** – would involve a northwards extension of the aforementioned committed site for 90 homes, located to the east of the Hanwell Brook and to the west of the A423. The Landscape Study assigns overall ‘moderate’ sensitivity to land in this area (BAN15), but is clear that sensitivity is lowest adjacent to the Banbury settlement boundary, i.e. where there is already a committed site for 90 homes. Land within the site rises to the northeast, towards an adjacent crematorium, and drops away to the west, towards the Hanwell Brook, such that there is considered to be a landscape constraint. The site benefits from direct access onto the A423, as well proximity to employment and community infrastructure delivered over recent years alongside housing growth (although this part of Banbury is distant from a secondary school). However, the Transport Assessment (2022) does not identify this as one of the higher quality A-road corridors at Banbury. On the other hand, it states:

“... A423 Southam Road... there is scope for this route to be enhanced for walking and cycling in particular, with width available within or close to the highway expansion. Key challenges are the industrial nature of the road towards the town centre, and the rural edge towards Hanwell View.”

It follows that **LPR61**, which is located further north, can also be ruled-out. Allocation of both sites (potentially in combination with growth to the west of Hanwell Brook) could feasibly support targeted investment in the Hanwell Brook corridor, along which there is currently no priority habitat, nor any public access (other than Hanwell Brook Wetland, adjacent to the Banbury settlement edge). Also, the possibility of improved flood storage to benefit the extensive urban areas at risk of flooding downstream could be explored. However, this is not considered to be a realistic option to explore at the current time.

- **LPR47/48** – are the final options for consideration at the northern extent of the town, and would involve further extending a strategic urban extension that is currently under construction, located either side of the B4100. This road corridor is supported by the Transport Assessment (2022) as one of Banbury’s better performing road corridors; however, it is obviously the case that links to Oxford and Bicester are relatively poor, and the town centre is distant (see Figure 5.7). The road is associated with a linear plateau, with the land falling away to valleys to the west (Sor Brook) and east (Hanwell Brook), but there is space for further expansion on the plateau, with the Landscape Study assigning ‘low-moderate’ (east) and ‘moderate’ (west) sensitivity. A key issue is guarding against linear ‘sprawl’ along the road corridor.

Land to the east of the road (LPR47) might be a first port of call, given the Landscape Study, and given the potential for limited development alongside greenspace / landscaping to secure a long-term defensible gap to the Hanwell Conservation Area. However, it is noted that the existing strategic urban extension to the east of the road (i.e. south of LPR47) is strongly bounded at its northern extent by a thick tree line that seemingly follows the route of a historic track (shown on the pre-1914 OS map). Furthermore, LPR47 includes two public footpaths that converge at the Grade I parish church, as well as another historic track (shown on the pre-1914 OS map). It is also noted that the field directly north of LPR47, which might feasibly form a landscape gap to the conservation area, potentially has a degree of historic character itself (shown on the pre-1914 OS map as seemingly part of the landscaped grounds of Hanwell Castle), plus there is an [observatory](#) at Hanwell, and hence a degree of light sensitivity.

A final consideration is agricultural land quality, with all land north of Banbury having been surveyed in detail, and found to comprise a mixture of grade 2, grade 3a and grade 3b quality land. All of the sites other than LPR61 are shown to include significant grade 2 quality land.

- 5.4.13 Moving anti-clockwise, the next port of call is **LPR49**, which would involve a southern extension to the west of Banbury strategic urban extension that is currently under construction. The combined site – i.e. the committed site plus LPR49 – is located near to the western extent of a plateau, with land to the west dropping quite steeply towards the valley of the Sor Brook, and with the start of the valley marked by a series of small woodlands. However, there is space available for development without risking built form spilling into the valley, and this is reflected in the findings of the Landscape Study, which assigns an overall ‘low-moderate’ sensitivity score, and the proposal reflected in a submitted planning application (250 homes; ref. [22/02101/OUT](#)) is for a significant greenspace buffer at the western extent of the site. Also, at the western edge of the site is a public bridleway that forms part of the Banbury Fringe Walk marked trail, which helps to reduce any concerns regarding problematic future development ‘creep’ to the west. A primary constraint is an adjacent Grade II listed farmhouse, and there is also a need to note that road access would be via existing estate roads, plus the site is not located on a primary transport corridor. Furthermore, the site has been surveyed and found to comprise grade 2 agricultural land. However, the site is overall considered to be subject to relatively low constraint, and warrants being taken forward.
- 5.4.14 The next sites to consider are **LPR50** and **LPR51**, which are located either side of the B4035. Landscape is again a key consideration here, with the Landscape Study assigning ‘moderate-high’ sensitivity, reflecting the fact that the B4035 is associated with a shallow valley, with land rising to the north (LPR50) and south (LPR51). The very northern extent of LPR50 is now a committed site for 49 homes, but this is not thought likely to have a significant bearing on the landscape sensitivity of LPR50 overall. On the one hand, land here benefits from good access onto the B4035; however, on the other hand: the road serves a rural area, and so is unlikely to be served by a frequent bus service; there is no cycle path along the road; and there are potentially sensitive views from the road (subject to hedgerow height and leaf cover) to rising land on the approach to / upon leaving Banbury. There are also potentially sensitive views across this land to / from Crouch Hill (located just to the south), from the Banbury Fringe Walk and/or from Saltway Farm Shop. Overall, this is considered a sensitive rural gateway to Banbury. However, on the other hand, it is noted that land here has been surveyed in detail and found to comprise grade 3b quality agricultural land, such that it is *not* classed as best and most versatile, in contrast to sites discussed above. On balance, these two sites are judged to perform relatively poorly, but this is quite finely balanced in the case of LPR50, which could potentially have *relatively* limited landscape sensitivity (also, it is noted that the surface water flood zone along the valley affects LPR51 more so than LPR50). The possibility of a joint scheme involving LPR50 and LPR49 (adjacent to the north), could feasibly be considered, with a view to securing improved road access to LPR49, but this has not been proposed by the site promoters.
- 5.4.15 Moving to the south of Banbury, the next site to consider is **LPR52**, which would involve a southern extension to a committed strategic urban extension. The series of committed sites to the south of Banbury together amount to a very significant extension of the town in this direction, which can broadly be described as comprising land to the south of Salt Way, which is a historic track that is now a bridleway and forms part of the national cycle network. The committed scheme directly to the north of LPR52 is well-contained at its southern boundary by a tree belt; however, there is considered to be landscape capacity for a further southern extension, taking the urban extension to the next logical boundary to the south, namely Wykham Lane. Land in this area is very gently descending to the south, towards the valley of the Sor Brook; however, the potential to utilise Wykham Lane as a defensible boundary means that there are few concerns regarding long-term development creep, and the Landscape Study assigns ‘low-moderate’ sensitivity. There is historic environment constraint, with a Grade II listed farmhouse adjacent to the east, a cluster of listed buildings at Wykham Farm to the south west, another historic farm adjacent to the south (shown on the pre-1914 OS map; now offering a farm shop and café) and the Bodicote Conservation Area to the east (including the sensitive junction of Wykham Lane and Bodicote High Street), plus there are a number of popular footpaths in the vicinity. However, there is understood to be good potential to deliver greenspace / landscaping as mitigation, plus the proposal is not to allow road access to Wykham Lane.

Also, the land here has been surveyed in detail and found to comprise grade 2 quality agricultural land, in contrast to the committed site to the north, which includes significant 3b (non-BMV) quality land.

5.4.16 There is also a need to carefully consider implications for the work that has been completed over a number of years to masterplan and plan for infrastructure around the committed urban extensions in this area. Focusing on the scheme directly to the north of LPR52, permission was granted in 2019 for 1,000 homes (ref. 14/01932/OUT), following a planning application having been submitted in 2014, which potentially serves to indicate a challenging process. Figure 5.10 is taken from the most recent submitted Design and Access Statement (2017), and shows that the scheme will deliver (or facilitate delivery of) a range of infrastructure alongside housing, including by providing land for a primary school and to enable expansion of the adjacent secondary school. It can also be seen that a new east-west link road between the A361 and A4260 corridors is central to the committed scheme, but would be less central to an expanded scheme. Figure 5.11 then shows a concept plan – as submitted by the site promoters in 2020 – for a potential southern extension (LPR52). It can be seen the proposal is for primarily residential.

Figure 5.10: Land use across the committed Wykham Park scheme (1,000 homes), north of LPR52

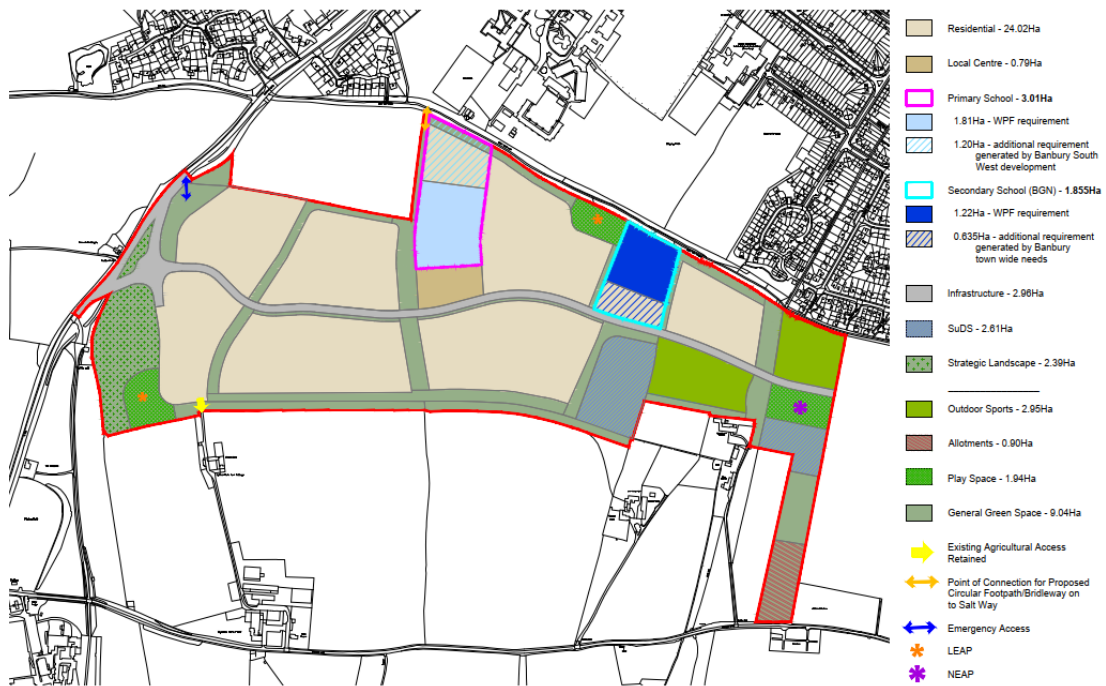
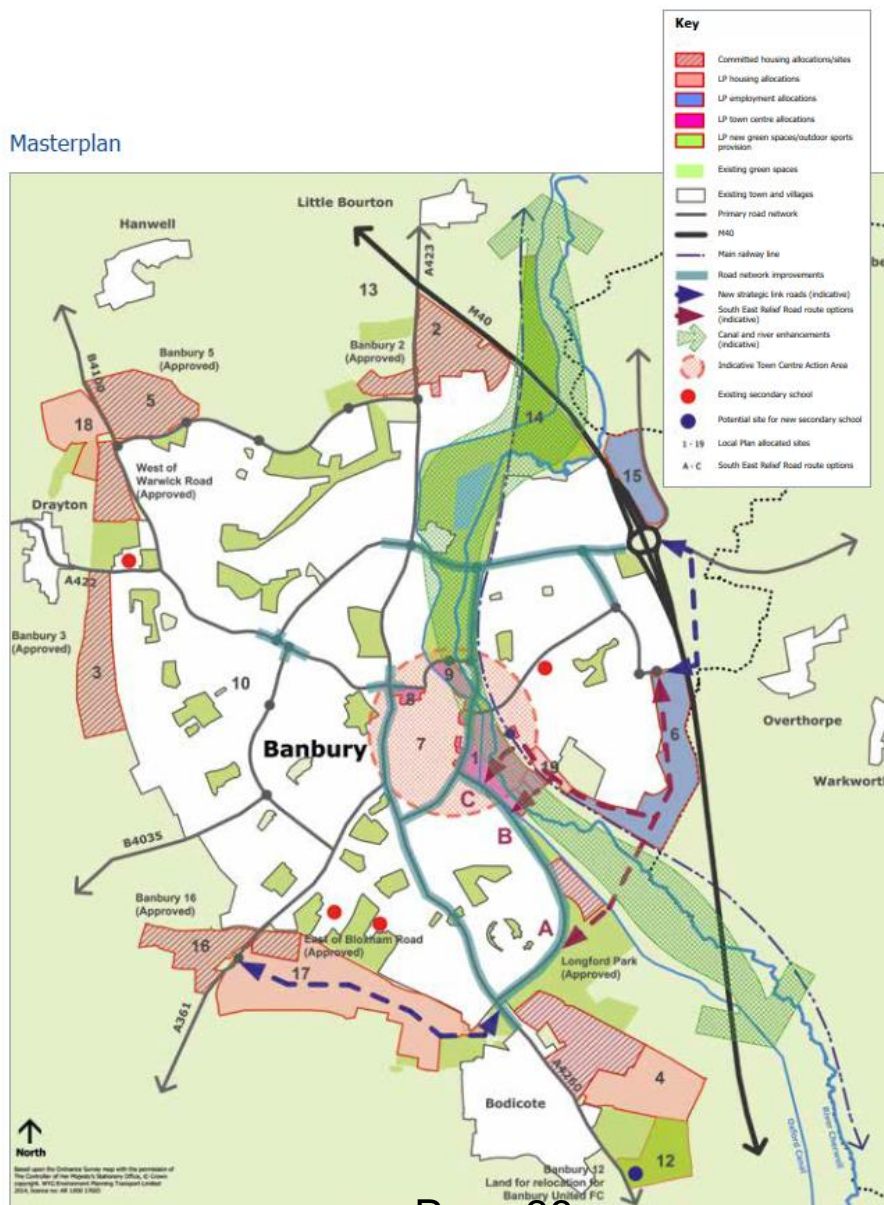


Figure 5.11: Land use across the committed Wykham Park scheme (1,000 homes), north of LPR52



- 5.4.17 Moving to the east, **LPR53** is associated with Bodicote, which is quite well-connected in transport terms, with good cycle connectivity and access to the A4260, which links Banbury to Bicester and Oxford, plus Bodicote forms part of a cluster of larger villages, along with Bloxham and Adderbury. The Landscape Study does not examine this site; however, there is likely to be a degree of landscape sensitivity, with land at the southern extent of Bodicote gently falling away towards the Sor Brook, plus there is a high concentration of public rights of way nearby, including a bridleway that forms part of national cycle network. However, it is historic environment constraint that is potentially a foremost consideration, with the strong likelihood that expansion to the south of Bodicote would generate significant car trips through the village conservation area, plus there is historic environment value associated with the Sor Brook. Taking these constraints into account, alongside an understanding that Bodicote is a larger village in the settlement hierarchy, and mindful of the level of recent / committed growth at Bodicote and nearby (including a recent expansion to the south, adjacent to the A4260), LPR53 is judged to perform relatively poorly.
- 5.4.18 Moving to the east of Bodicote, **LPR54** is clearly sensitive in landscape terms, not linking directly to the settlement edge, and being closely associated with the Cherwell valley. The proposal is for recreational / leisure uses, and this is an option that could be revisited subsequent to the current consultation.
- 5.4.19 A further consideration in this area is the possibility of a southeast relief road (see Figure 5.12) to ease the current situation whereby a high proportion of traffic enters and exists the town via the problematic A422 Hennef Way. However, it is not clear that this remains a realistic possibility at the current time. N.B. Figure 5.12 also clearly shows the committed new link road between the A361 and A4260 corridors.

Figure 5.12: The key diagram presented within adopted Banbury Vision (2016)



5.4.20 The final sites to consider are located to the east of Banbury, namely **LPR57**, **LPR58** and **LPR59**, which are considered to only warrant consideration for employment, given the concentration of employment land at the eastern edge of Banbury (albeit the option of a mixed use community south of the A422 has been proposed). However, there are clear landscape sensitivities, with the Landscape Study assigning ‘moderate-high’ landscape sensitivity, particularly mindful of the Overthorpe Ridge. Land to the south of the A422 might benefit from relatively good containment (as opposed to risking sprawl along the A361), but Nethercote is a hamlet / farmstead with a degree of historic character, plus there are clearly links to the nearby Overthorpe Conservation Area, on raised land to the east. The site promoters point to the potential to deliver a new road link between the A422 and the Overthorpe Road / M40 crossing (see the blue-dotted line in Figure 5.12)). However, this potential road link should not be conflated with a southeast relief road. It is not clear the extent to which this new road link would deliver strategic benefit to Banbury (particularly in terms of relieving traffic along the Hennef Way), other than in terms of enabling employment growth east of the M40 *whilst avoiding worsening* the current situation. The Oxfordshire Local Transport and Connectivity Plan (2022) draws a [distinction](#) between the two road options.

5.4.21 In conclusion:

- There is strong support for allocating the two sites in the urban area, namely LPR55 and LPR56. The quantum of growth at LPR55 (Canalside) warrants further investigation, balancing development viability and flood risk considerations; however, on balance, it is appropriate to assume that the site would deliver 500 homes; and it is appropriate to assume that LPR56 would deliver an employment-only scheme.
- The sequentially preferable greenfield site for housing is considered to be LPR49, with support for 220 homes (mindful of the current planning application for 250 homes). There is also support for this scheme from a delivery perspective, as it is in the control of the same housebuilders currently delivering the site adjacent to the north, such that it should be able to deliver early in the plan period.
- The next sequentially preferable site is considered to be LPR52, albeit there are a range of detailed matters for further consideration, including around effective masterplanning in conjunction with the committed scheme to the north. The current assumption is delivery of 600 homes, but this will need to be reviewed on the basis of further detailed work. Assuming no unforeseen challenges, particularly around masterplanning and infrastructure, then this site is also thought to be associated with relatively low delivery risk, as per LPR49, although it would clearly deliver later in the plan period.
- Allocation of both LPR49 (220 homes) and LPR52 (600 homes) would mean delivery of 1,320 homes in total, over-and-above completions and commitments (after having accounted for a reduction in commitments due the existing Canalside and Higham Way allocations not being deliverable). This is a reasonable quantum of housing growth for Banbury, mindful of: strategic factors (discussed above and in Section 5.2); levels of recent and committed growth at the town; and the potential for additional housing land supply being identified within the town centre prior to plan finalisation. Simply removing LPR52 would result in too few homes at Banbury (specifically $1,320 - 600 = 720$ homes).
- The next sequentially preferable sites to consider might be LPR47 (to the north/northwest) and LPR50 (to the west). However, on balance, growth scenarios involving allocation of one or both of these sites (either to deliver higher growth or in place of LPR52) are judged to be unreasonable at the current time.
- With regards to employment land, in addition to allocation of Canalside (which may or may not deliver a net increase, given existing employment land onsite) and Higham Way (3.2 ha), there is the option of further allocation to the east of the town. This option is discussed further in Section 5.5.

5.4.22 In **summary**, and focusing only on housing, there is one reasonable growth scenario involving allocation of LPR49, LPR52, LPR55 to deliver 1,320 homes over-and-above completions and commitments.

One reasonable housing growth scenario for the Banbury sub-area

Site	Scenarios		Notes on assumptions etc.
	1	2	
LPR49	220	-	Note current application for 250 homes.
LPR55	500	-	Committed allocation is for 700 homes; significant flood risk.
LPR52	600	-	Further work to masterplan given adjacent committed site.
Total	1,320	-	May need to revisit / explore other options post consultation.

Bicester

- 5.4.23 As per the discussion in Section 5.2, there is a clear argument for rolling forward the existing strategy of directing a greater proportion of growth to Bicester than to Banbury (i.e. the adopted local plan strategy), given that Bicester is associated with fewer constraints and a clear strategic growth opportunity.
- 5.4.24 With regards to growth opportunity, key considerations include: a position at the northern extent of the Oxfordshire Knowledge Spine; a central position within the Oxford to Cambridge Arc, with a new rail link to Bletchley (Milton Keynes) due to open in 2024; excellent connectivity to the M40 and also the A34 (a key route linking the port of Southampton to the Midlands and beyond); good links to Aylesbury Garden Town via the A41 and also a good train service to London; a desire to support a shift away from a dominance of warehousing and logistics employment uses, to a more mixed portfolio of sites, to include support for more knowledge sector jobs; the recent success of Elmsbrook, as the first delivered phase of the committed NW Bicester Ecotown scheme, which has gained national attention as an exemplar low carbon development (e.g. see www.ukgbc.org/solutions/case-study-elmsbrook/); and the emerging success of Graven Hill – which is currently building-out – as England’s largest self-build housing scheme.
- 5.4.25 Bicester also has an established status as a garden town and a healthy town, which serves to highlight the potential for growth to bring with it benefits to the local community (‘planning gain’). However, there is a concern regarding infrastructure capacity to support growth, perhaps most notably in respect of transport infrastructure, with a key issue being the lack of a southern link road, which leads to concerns regarding traffic and supporting modal shift to walking / cycling and public transport.
- 5.4.26 With regards to spatial strategy, a key point to note is that whilst landscape and associated environmental constraints to growth (also agricultural land quality constraints) are overall considered to be relatively low, Bicester is far from a ‘blank canvass’ for further growth, including due to infrastructure capacity issues. Bicester has expanded in a largely concentric fashion from its central historic core (Bicester was a small market town until the latter 20th Century), but there are a range of broad spatial considerations:
- Southwest (north of the A41) – the sector of land between the A41 and the Middleton Stoney Road has been developed as major new community (Kingsmere) over the past 15 years. An important new link road between the two radial road corridors was successfully delivered as part of an early phase, as well as significant new community infrastructure, and the road forms a natural western boundary to Bicester, serving to ensure that a landscape gap is maintained to historic village of Chesterton (where a community woodland is in development, in line with adopted Local Plan Policy Bicester 7). However, options for further growth in this sector do require consideration, given good transport connectivity.
 - Northwest – this is the location of the committed NW Bicester Ecotown, which has faced delivery challenges, including relating to fragmented land ownership, and the challenge of delivering a realigned Northwest Bicester ring road (A4095, Howes Lane), although the first phase (Elmsbrook) has now been delivered, at the eastern extent of the wider site, and a number of other planning applications have been approved or are currently under consideration. The historic village of Bucknell (including a Grade I listed parish church) is to the north, and a constraint to further expansion. However, on the other hand, expansion of Bicester as far as Bucknell (beyond which is slightly rising land associated with a modest density of small woodland patches) and the M40 is an option to consider. To the northwest is Ardley (including land proposed to be safeguarded for a reopened train station), M40 J10 and Heyford Park.
 - Northeast – this sector is associated with Caversfield Parish, to the west of the A4421, and Bicester Airfield to the east. At the western extent of this area, directly to the east of NW Bicester Ecotown, is Caversfield House, which is not itself listed, but which is associated with landscaped grounds and a Grade II* listed church, plus there is an associated historic farmstead. To the east is then an area known as Caversfield, comprising military housing originally built to serve RAF Bicester. The airfield itself, which remains in use as an aerodrome, and is the home of Bicester Heritage Business Park, is then to the east of the A4421. The entire airfield is a designated conservation area, and a key sensitivity is the cluster of 26 Grade II listed buildings at its southwest extent (also associated with the business park), which together contribute much to understanding of early 20th Century air force heritage. As well as heritage and tourism constraint, land to the east of Bicester has relatively poor transport connectivity.
 - East – to the southeast of the airfield is a recently delivered new employment site and a stream associated with a significant flood plain. Beyond this is a sector of land that comes into consideration as a potential location for growth, albeit it is not very well linked in transport terms (noting employment land at the eastern extent of Bicester). Also, there is a potential concern regarding eastwards sprawl across a flat and relatively featureless landscape.

Moving to the south, there are two railway corridors (East West Rail, which is under construction, and the Chiltern Line to London), with the village of Launton located in between, which has a strong historic core, albeit no conservation area. There is the option of modest expansion as far as defensible boundaries, namely the railway lines and a flood risk zone.

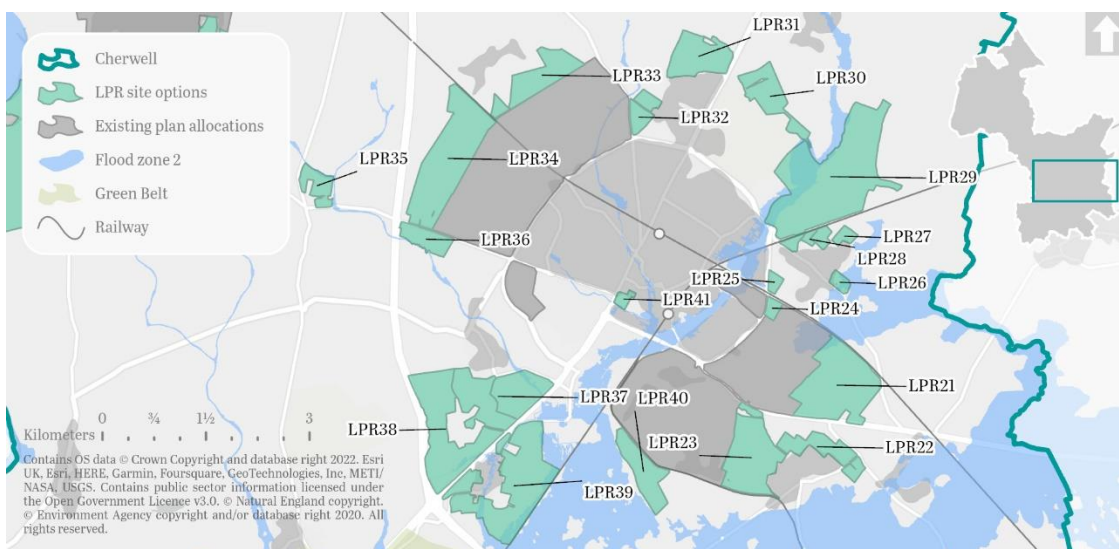
- Southeast – this is the location of a major committed urban extension, which gained planning permission for 1,500 homes in 2018, with the employment land now having been delivered, adjacent to the A41. There is the possibility of further expansion, drawing upon the railway line to London and the A41 for containment, also mindful of Blackthorn Hill, which is a low hill in an otherwise very flat and low-lying landscape, and mindful of the sensitive landscape of the Upper Ray Meadows further to the southeast. The A41 is a strategic transport corridor; however, there are challenges in respect of connectivity to/from the M40 and Oxford, given: the missing southern link road; nearby growth at Graven Hill; nearby Bicester village; and the B4100 (London Road) level crossing, particularly given forthcoming East-West Rail.
- South – the majority of land in this sector, between the settlement edge and the flood risk zone / meadows of the River Ray, is committed, most notably the new community at Graven Hill, but also Bicester Park and Bicester Gateway Business Park, plus there is a large scheduled monument (the site of a Roman town). Land feasibly available for further development is primarily located: between Graven Hill and the flood risk zone to the south; and between Ambrosden / the flood risk zone to the south east. There are transport connectivity challenges, as per the discussion of land to the southeast of Bicester.

At this point it should be noted that options for a new southern sector of the Bicester ring road have been under consideration since the time of the Oxfordshire Local Transport Plan (LTP4, 2016).

Also, there is a need to briefly mention Upper Arccott, where the option of strategic growth is considered to perform poorly relative to options at Bicester and village locations more closely aligned with transport objectives, such that it is **ruled out** as unreasonable (and so not discussed below). There is low historic environment constraint, but notable biodiversity constraint (albeit possibly also some opportunity).

- Chesterton and Wendlebury – to the southwest of Bicester, located either side of the A41, are the smaller / small villages of Chesterton and Wendlebury. This area comes into consideration as a potential location for growth given good transport connectivity, with good potential to cycle to Bicester, and very good bus connectivity - and the potential for employment land close to M40 J9. Growth here could also assist with delivering a southern link road, albeit this should not be overstated, as growth anywhere at Bicester might reasonably be required to contribute funding, given the scheme’s strategic importance.
- Weston-on-the-Green – briefly, the option of strategic growth here has been proposed, potentially in the form of a new settlement, given that Weston-on-the-Green is a smaller village (without a primary school). However, this option performs poorly, given transport connectivity, specifically links to Bicester to the east and Oxford to the west, and so is **ruled-out**. Alternative new settlements are being promoted at Islip and Shipton Quarry that – whilst being located within the Green Belt - would (or could) support good access to a train station. Also, it would be a challenge to secure landscape containment, given a flat and expansive landscape. Development creep northwards, towards an airfield associated with slightly raised ground, could be envisaged. A preferable strategy is to focus growth at, or closer to, Bicester.

Figure 5.13: Strategic site options at Bicester



5.4.27 From Figure 5.13, a logical starting point is the cluster of site options associated with **NW Bicester Ecotown**, where there is a need to revisit the adopted local plan allocation, given delivery challenges. There is also a need to be mindful of the work that has been undertaken through planning applications; however, equally, planning applications are subject to change, and LPR represents an opportunity to take a strategic, plan-led approach, mindful of lessons learned since the [Masterplan](#) was published in 2014.

5.4.28 Key components of the NW Bicester Ecotown site are:

- Hawkswell Village (ref. [21/04275/OUT](#)) – is a pending application for 3,100 homes, comprising the majority of the eastern half of the wider Ecotown allocation. A key point to note is that the application site extends north significantly beyond the boundary of the NW Bicester Ecotown allocation (an extra 45 ha), closing the gap to the village of Bucknell; however, the proposal is to deliver green / open space in this area, thereby helping to secure a long-term defensible landscape buffer to Bucknell. Figures 5.14 and 5.15 are taken from the Design and Access Statement submitted as part of the application.
- Elmsbrook / Firethorn – is at the eastern extent of the area. Elmsbrook has delivered as an exemplar scheme (393 homes) that has gained national attention. The remainder of this area primarily comprises the Firethorn site, where there is a current planning application for 530 homes (ref. [21/01630/OUT](#)).
- Remaining land including Himley Village – the bulk of land here has been granted planning permission in the past (most notably [14/02121/OUT](#) and [14/01641/OUT](#)), but there are delivery challenges, including given the challenge of delivering a realigned section of the Bicester ring road.

Figure 5.14: The Hawkswell Village application in the NW Bicester and wider Bicester context

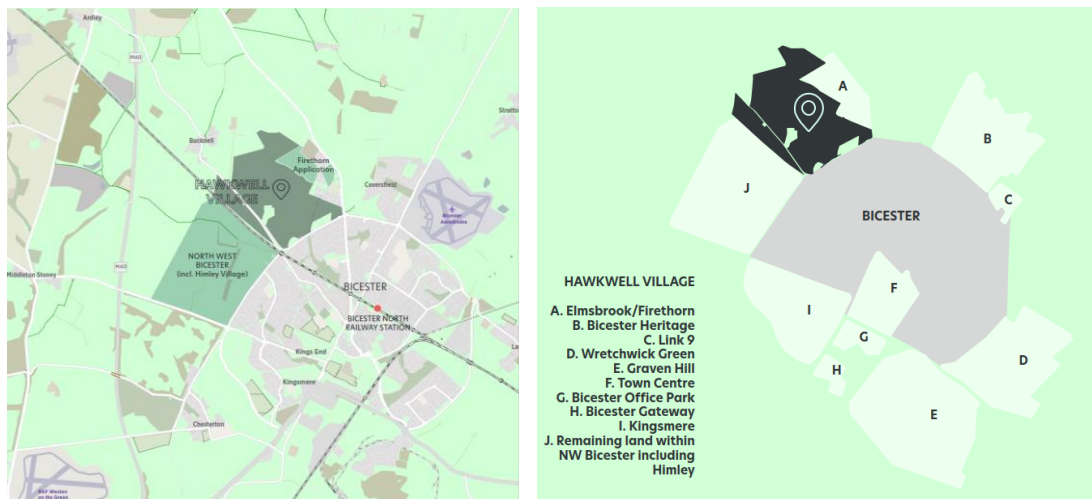


Figure 5.15: The concept masterplan for Hawkswell Village (from the current application)



- 5.4.29 One clear option for the LPR is to support an extended red line boundary (**LPR33**), as per the Hawkswell Village application, and to support an uplift in the number of homes across the Ecotown as a whole, taking account of detailed work completed through planning application processes and with a reasonable assumption made regarding the final sector of land (at the north west extent, either side of Langford Brook) where there is yet to be any planning application submitted. The built form would be higher density than previously envisaged, but there would be new strategic green / open space at the northern extent of the scheme / south of Bucknell, and the effect would be to support viability and ultimately deliverability.
- 5.4.30 It is understood that LPR33 would be made available for this use, whilst it is less clear this would be the case for **LPR34**. Also, and in any case, use of LPR34 for green / open space would not bring the benefit of securing a defensible landscape buffer to Bucknell (and, indeed, would risk a poor use of land that might alternatively be considered for development). With regards to the option of allocating LPR34 for development, this would not necessarily serve to address the deliverability challenges with respect to the existing allocated site, and could even worsen the situation. The time for considering any expansion of the Ecotown would be once it is further along the path to delivery. A further consideration is adjacent Ardley Cutting SSSI, although this is potentially a green infrastructure [opportunity](#) as well as a constraint.
- 5.4.31 There are also two smaller sites that would link closely to the Ecotown, namely LPR32 and LPR36. However, it is again generally the case that there is limited argument for expanding the built form of the Ecotown at the current time. Also, these are smaller sites that are less 'strategic' in nature, i.e. would deliver little in support of strategic objectives, aside from new housing. Finally, there are certain site-specific issues, particularly proximity to heritage assets. In the case of **LPR36**, this is adjacent to Bignell Park, which is not a registered park and garden, but is nonetheless valued (also in biodiversity terms), albeit the possibility of growth supporting improved access might feasibly be explored. With regards to **LPR32**, an issue is maintaining a landscape gap to / protecting the setting of historic Caversfield.
- 5.4.32 In **conclusion**, with regards to NW Bicester, there is strong support for a higher density scheme within the current committed site, with the site boundary extended to include land to the south of Bucknell (LPR33), which would be used primarily to deliver open / greenspace. The current proposal is to support delivery of an additional ~1,000 homes, which is a significant increase in capacity / density, such that this figure will need to be kept under review, including with a view to ensuring a scheme with a strong green and blue infrastructure network integrated throughout (also a good mix of homes, to include family housing, and good space standards). However, at the current time, it is not clear that there is an alternative, lower growth figure that would achieve the deliverability objectives.
- 5.4.33 Moving clockwise, **LPR31** is relatively unconstrained in a number of respects, but is judged to perform relatively poorly in terms transport connectivity and links to Bicester / relationship with the existing settlement edge, mindful of distance to the town centre and limited community infrastructure offer at Caversfield, e.g. there is no primary school. There would also be a concern regarding north-eastwards development creep along a flat and relatively featureless landscape, although the potential for well-targeted woodland creation to bound the northeast extent of a development scheme can be envisaged.
- 5.4.34 With regards to **LPR30**, the proposal is for leisure/recreational uses, given that land here comprises a former quarry that is now designated as a local wildlife site (also a geological SSSI), plus there is a need to consider relationship with the adjacent airfield conservation area.
- 5.4.35 Next is **LPR29**, which is a reasonable option to consider for employment growth, given the current focus of employment land at the eastern edge of Bicester. However, it is generally the case that land east of Bicester is less-well linked in transport terms. There are limited constraints in some respects, and it is noted that the nationally available (low accuracy) agricultural land quality dataset suggests grade 4 quality land (in contrast to land north of Bicester, where the dataset suggests grade 3). However, there is a large area of surface water flood risk, including related to the adjacent railway, and there is a need to be mindful of downstream flood risk affecting Bicester, albeit it is primarily (or exclusively) employment areas that are at risk. Also, it is noted that the Landscape Study assigns 'moderate' sensitivity to land here, which amounts to relatively high sensitivity in the Bicester context (there is a notable density of footpaths in this area), and there is a potential concern regarding effective containment, i.e. a risk of 'sprawl'.
- 5.4.36 The next sites to consider are those associated with **Launton**. An immediate point to note is that LPR26 was granted permission at appeal for 72 homes in 2018 (ref. [17/01173/OUT](#)), and then LPR27 was granted permission at appeal in 2022 (ref. [21/04112/OUT](#)), which serves to limit arguments for further housing growth, plus there is a need to consider in-combination traffic impacts, given a single lane (signalised) bridge over the railway, between Launton and Bicester.

5.4.37 In this context, and in the wider Bicester context, the remaining sites are judged to perform poorly:

- **LPR25** – could be a reasonable option to consider for employment land, specifically as an extension to Bicester Park. The possibility of further growth in this broad area might be considered, given road links to Bicester via the A4421, which has recently been upgraded as part of East West Rail works, to include a cycle path. However, it is nonetheless the case that the road link to Bicester is indirect, given intervening employment land. Also, the Landscape Study identifies land here as relatively sensitive in landscape terms, noting that Launton is a ‘well-defined nucleated’ village. It is also noted that there is a high density of historic field boundaries (shown on the pre-1914 OS map), as well as two public footpaths that link nearby communities to Launton, including its two public houses and grade 1 listed church.
- **LPR28** – might deliver a modest expansion to Launton itself, and benefits from being located on the Bicester side of Launton, but is adjacent to the Grade I listed parish church, manor farm (where there is a Grade II* listed tythe barn) and the railway line.

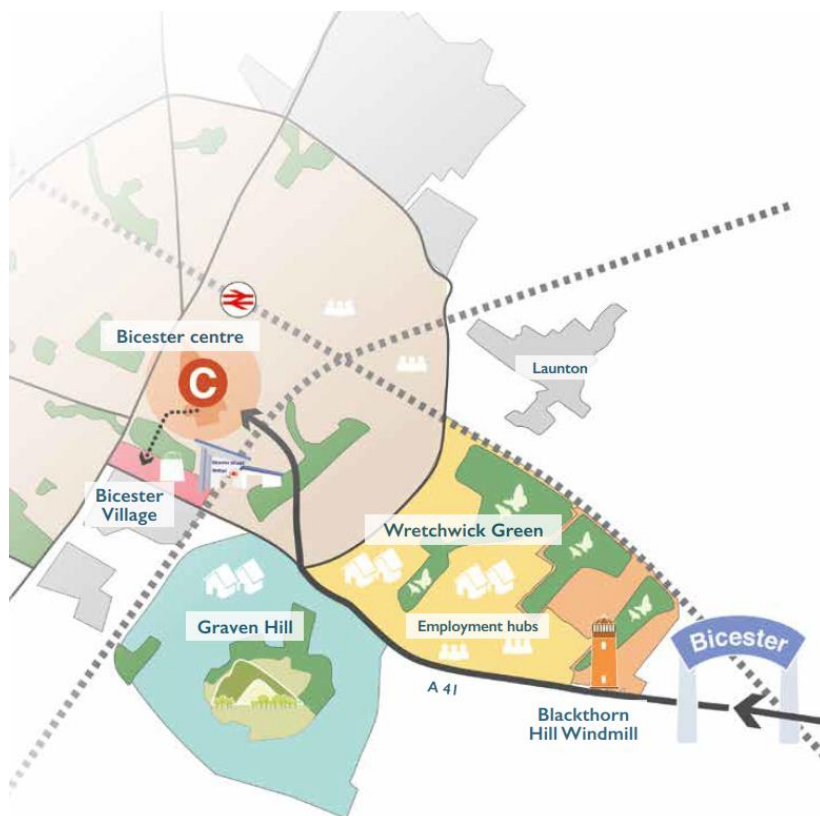
5.4.38 The next sites to consider are those that would deliver an extension to the committed SE Bicester strategic urban extension. Figure 5.16 shows the masterplan for the primary component of the committed site (Wretchwick Green), which was granted permission in 2018, subsequent to the bulk of employment land (Symmetry Park) gaining permission earlier (now part complete). There are a number of constraints to further expansion of the scheme to the east (**LPR21**), namely: a large local wildlife site, associated with an area of ‘lowland meadow’ priority habitat; Blackthorn Hill, which is associated with two windmills, one of which is Grade II listed, as well as a bridleway; overall ‘medium-high’ landscape sensitivity, according to the Landscape Study (such that this is one of the two most sensitive Bicester landscape parcels); a degree of surface water flood risk; and the possibility of better quality agricultural land than the adjacent committed site (according to the nationally available dataset). However, transport connectivity terms, the option of further expansion of Bicester in this direction performs well, relative to the alternatives, with good connectivity to the A41, and good cycle connectivity to the town centre / railway station, albeit the B4100 / EWR level crossing is a constraint, given East-West Rail (although [options](#) for addressing the constraint are under consideration), and there is a wider concern regarding connectivity to the M40 / Oxford in the absence of a southern link road (discussed above). Figure 5.17 shows one of the maps presented within a vision document received from the site promoter in September 2021.

5.4.39 Finally, there is a need to consider **LPR24**, which comprises a local wildlife site, and is adjacent to the committed “nature conservation area” shown in the figure below.

Figure 5.16: The committed Wretchwick Green (SE Bicester) strategic urban extension



Figure 5.17: The site promoter's vision for a 'gateway' and linked green spaces



5.4.40 Moving west, the next sites to consider would involve an extension to the committed Graven Hill scheme and/or Ambrosden. Considerations include:

- **LPR40** – performs relatively poorly, given clear access challenges / poor transport connectivity, mindful of: current access by rural lanes; the adjacent military railway / sidings; adjacent existing / former MOD MOD buildings that fall outside of the current Graven Hill masterplan (Figure 5.16; also the masterplan presented as part of planning application [21/03749/F](#)); and an area of scrubland or tree planting.
- **LPR23** – might feasibly be delivered in part in order to deliver an extension to Graven Hill or, alternatively, in full in order to deliver comprehensive growth between Graven Hill and Ambrosden.
 - The former option may have a degree of merit, given good potential to draw upon an area of priority habitat woodland / surface water flood risk (including an area of former quarry) as an eastern boundary. Development might relate quite well to the eastern extent of the Graven Hill scheme, as understood from the current masterplan (Figure 5.18), and could potentially link well to the A41; however, the southern extent of Graven Hill (not shown in Figure 5.18) is set to deliver extensive employment land. A constraint is a historic farm at the northern extent of the site, associated with two Grade II listed buildings; however, it is noted that the farm is set well-back from roads in the area, and there are no public rights of way in the area, so there could be an opportunity to increase appreciation. It is also noted that the nationally available dataset suggests grade 4 quality agricultural land in this area.
 - The latter option (development of LPR23 in full) would involve breaching the area of woodland / surface water flood risk, and closing the landscape gap to Ambrosden. The concern is that development here would amount to an extension to Ambrosden more so than an extension to Bicester, given challenges in respect of linking to the A41. Specifically, there is an area of land between the site and the A41 that has not been made available for development. Were this land to be made available, then the possibility of comprehensive growth in this area - completing the expansion of Bicester as far as Blackthorn Hill or Blackthorn / the Upper Ray Meadows (bounded to the north by the railway line) - might be considered. Comprehensive growth might be in combination with other LPR sites in the vicinity, and might facilitate delivery a southern link road (discussed above). However, the unavailable land in question is significantly affected by surface water flood risk. Also, it is noted that the nationally available dataset shows grade 3 quality land in this area, associated with Blackthorn Hill. Ambrosden is clearly associated with the hill, and there is an argument for retaining this characteristic feature. Finally, there is a need to be mindful of the proposal to deliver a major new area of employment land at the southern extent of Graven Hill (see the committed Graven Hill masterplan at [21/03749/F](#)).

- **LPR22** – would involve expansion of Ambrosden. There is some opportunity here, but there is no reason to suggest any particular benefit to developing LPR22 in full, i.e. there is limited ‘strategic’ growth opportunity. Considerations include: transport connectivity, e.g. noting the cycle path along Ploughley Road, to the north; in-combination traffic impacts, mindful of nearby committed and further potential strategic growth; maintaining Ambrosden’s association with Blackthorn Hill; quite weak field boundaries in this area; grade 3 quality agricultural land (according to the national dataset); significant recent housing growth, most recently a site granted permission at appeal for 84 homes to the west of the village (which will generate traffic through the village); and two pending planning applications to the east of the village.

Figure 5.18: The current Graven Hill Masterplan (gravenhill.co.uk)



5.4.41 The final sites to consider are located to the southwest of Bicester, associated with Chesteron, Wendlebury and Junction 9 of the M40. Specifically:

- **LPR39** – is associated with Wendlebury, which has a strong rural and historic character, having expanded little since the extent shown on the pre-1914 OS map, and is notably located on National Cycle Route 51, which passes between Bicester (including the nearby Graven Hill new community, via Langford Lane) and the countryside villages to the west / Kidlington. However, it is recognised that the parish church is only Grade 2 listed (i.e. the lowest grade), and is located at the northern extent of the village, near adjacent to the A41. Also, it is recognised that the Landscape Study assigns ‘low-moderate’ sensitivity, and that the national dataset suggests grade 4 quality agricultural land.

A large area of land is being promoted for a 2,800 home new community, to include making land available for a southern link road. However, the proposed scheme would extend east well-beyond the extent of LPR39; specifically, it would extend significantly east of the railway line to Oxford, where all land is affected by flood risk and there is extensive floodplain grazing marsh priority habitat (according to the nationally available dataset), associated with the Upper Ray Meadows, with a wetland SSSI located ~2km downstream. The proposal is to address flood risk by land raising, but this approach would risk conflicting with the nationally required sequential approach to avoiding flood risk, given alternative sites available that are located outside of flood risk zones. There is also a notable flood risk channel associated with Wendlebury itself, although there is a proposal (as part of the 2,800 home scheme) to deliver a new relief channel to address this. Finally, it is understood that archaeological constraint is likely to extend beyond the scheduled monuments adjacent to the north of the site (a Roman town).

- **LPR38** – is an option to deliver a strategic new employment area, given excellent road connectivity, namely a location at the junction of the A41 and the M40. This would be a major extension to a large scheme adjacent to the motorway junction that now has a resolution to grant planning permission (ref. [22/01144/F](#)) for “a new high quality combined research, development and production facility of 54,000 sq m designed specifically for Siemens Healthineers” that would create “up to 1,200 skilled jobs... when the facility is fully operational” (plus the scheme would assimilate an existing facility at Eynsham). Looking beyond the Siemens site, there is the potential to comprehensively plan for a wider employment area and then, in turn, potentially the entire sector of land between Chesterton / Bicester Golf Club and the A41. Also, it is noted that land adjacent to the north is permitted to deliver a major new sports facility (ref. 19/00934/F). The landscape in this entire sector has ‘low-medium’ sensitivity, according to the Landscape Study, and this is grade 4 agricultural land, according to the national dataset (none of the land has been surveyed in detail). However, there are a range of sensitivities, including some flood risk, including associated with some priority habitat, and the small hamlet of Little Chesterton, where there are no listed buildings, but nonetheless a sense of rural / historic character (albeit appreciation by nearby communities could be relatively limited, e.g. in comparison to Wendlebury).
- **LPR37** – were LPR38 to come forward as a new strategic employment area, then it would increase the argument for strategic growth south of Chesterton (LPR37), in order to largely ‘complete’ the expansion of Bicester in this sector. Chesterton is a smaller village in the settlement hierarchy, but there is a primary school, e.g. in contrast to the nearby smaller village of Weston-on-the-Green. There are also limited constraints in some respects, notably in terms of landscape sensitivity and agricultural land quality (discussed above). However, a primary argument for strategic growth in this area relates to transport connectivity, given an established ambition to develop the A41 corridor as a route that prioritises bus travel and walking/cycling. There is already a park and ride, serving the S5 ‘Stagecoach Gold’ service and a high quality cycle route into Bicester, albeit this is somewhat distant from developable part of LPR37 (as discussed below). The A41 ambition was discussed in LTP4 (2016), and then an update is presented in the Oxfordshire LTCP (2022; see [page 168](#)). It is also important to note that there is good potential to achieve good road access to land here from the existing road network.

With regards to constraints to growth, a key consideration is the Chesterton Conservation Area, which extends to the southern extent of the town, albeit the southern extent of the conservation area may have relatively low sensitivity. More generally, there is a need to note that a Roman Road (Akeman Street) passed through Chesterton. However, there would be good potential to mitigate historic environment impacts through masterplanning, plus it is noted that a 63 homes scheme has recently been delivered at the southern extent of the village. Beyond historic environment constraint, there is a need to note several narrow flood channels passing through the site, although these are mostly associated with field boundaries, suggesting good potential to incorporate as part of green / blue infrastructure within the site. Also, it is noted that a planning application for 150 homes south of Chesterton is likely forthcoming, with a request for an EIA screening opinion submitted in 2022 (ref. [22/01135/SO](#)).

Finally, with regards to LPR37, there is a need to note that the eastern half of LPR37 is no longer available for residential development and, instead, is being promoted for employment land, which is not supported, given the aspiration of consolidating the built-form of Bicester. Specifically, there is a clear argument for strategic housing-led growth at Chesterton to integrate with Bicester, via an improved A41 corridor. There is the possibility of reimagining this corridor, with a focus on active and public transport, including linking the P+R to Bicester Village, if and when a southern link road is delivered.

5.4.42 Finally, **LPR41** comprises sports pitches adjacent to the north of Bicester Village, and to the south of Bicester Community Hospital, in close proximity to the town centre. An application has recently been submitted for a new 1.8-hectare community park, together with a new car and cycle hub and improvements to guest services at Bicester Village; see <https://bicesterpublicconsultation.co.uk/>. A key consideration is ensuring a strategy for Bicester Village that aligns with long term plans for the A41 corridor, with an aspiration for greater use of a Park and Ride to access Bicester Village.

5.4.43 In conclusion:

- There is strong support for additional supply from an expanded Northwest Bicester Ecotown, which will be referred to as simply Northwest Bicester. The current assumption is delivery of an additional 1,000 homes. This matter will be reviewed subsequent to the current consultation, including in light of detailed discussions with site promoters and mindful of ongoing detailed work through planning applications.
- There is support for further growth at Bicester, given broad-strategic factors. However, the ‘points of the compass’ and site-specific discussions presented above have served to highlight a range of challenges.

- The next best performing strategic site options are judged to be: LPR37 (west only), which would involve ~500 homes south of Chesterton, alongside strategic employment growth to the west (LPR38); and LPR21 (majority of the site, bar a small area that is not available; primarily housing, but also an area for employment adjacent to the A41 / recently developed employment site), which would involve an 800 home expansion of the Southeast Bicester (Wretchwick Green) committed site.
- Both sites are associated with constraints/challenges (notably biodiversity / landscape constraints in the case of LPR21, and impacts to Chesterton in the case of LPR37). However, both are quite strongly supported in transport terms, and overall once account is taken of the strategic context - i.e. arguments for growth at Bicester - and the potential alternative sites / locations for growth.
- Focusing on LPR21, the current assumption is 800 homes, but there will be a need to review this prior to plan finalisation, balancing constraints with a desire to achieve economies of scale in order to secure, for example, investment in new / upgraded transport and community infrastructure. In particular, there will be a need to consider whether it is appropriate to extend development beyond Blackthorn Hill.
- With regards to LPR37, there is a clear argument for consolidating the built form of Bicester in this western sector, in combination with strategic employment growth to the west, and with a focus on A41 corridor ambitions. However, only the western part of LPR37 is available for housing at the current time.
- These three allocations would deliver 2,300 homes, over-and-above completions and commitments, plus significant new employment land. This is potentially a reasonable quantum of growth. However, on the other hand, there is a need to explore the option of higher growth, given the strategic context.
- It is considered reasonable to explore the potential for further strategic growth to the south of Bicester, mindful of the southern link road issue. Also, land here is found to perform well in terms of 'accessibility' by the Transport Assessment (2022; see Figure 3-21). However, it is difficult to identify a preference for growth in the vicinity of: A) Wendlebury (LPR39); or B) Graven Hill / Ambrosden (LPR23).
- On balance, LPR39 at Wendlebury is taken forward, including with a view to exploring implications for A41 corridor ambitions, and mindful that the scheme would make land available for the western section of a southern link road. Also, land here is being very actively promoted, which is contrast to LPR23, where the site promoters have not submitted a concept masterplan since 2016, despite suggesting in 2020 that an updated masterplan would be submitted at the next consultation (i.e. in 2021). Having said this, the current proposal for a 2,800 home scheme comprising LPR39 is not supported. There is no certainty regarding an appropriate scale of growth that avoids flood risk zones, but ~1,000 homes is assumed, at this early stage. It is recognised that 1,000 homes here would risk not being seen as an extension to Bicester, but this is an issue that warrants being explored in detail. Growth here would have the benefit of being well-contained by flood zones and a large scheduled monument.
- Other strategic site options are ruled out as unreasonable at the current time, in light of the discussion of site-specific and Bicester-wide constraints / issues presented above.
- With regards to employment land, the emerging preferred option involves 6.3 ha at Southeast Bicester (LPR21) and 46 ha adjacent to M40 J9 (LPR38). These sites, in combination with committed sites, would deliver a high employment growth strategy for Bicester, and one that is strongly focused on the strategic transport corridors, such that it is difficult to foresee other available sites as realistic contenders. However, further consideration could be given to the option of employment in the eastern part of LPR37.

5.4.44 In **summary**, and focusing on housing, there are two reasonable growth scenarios involving: **A)** allocation of LPR34 (Northwest Bicester extension), LPR21 (part) and LPR37 (part) to deliver 2,300 homes over-and-above completions and commitments; and **B)** additional allocation of LPR39 for ~1,000 homes.

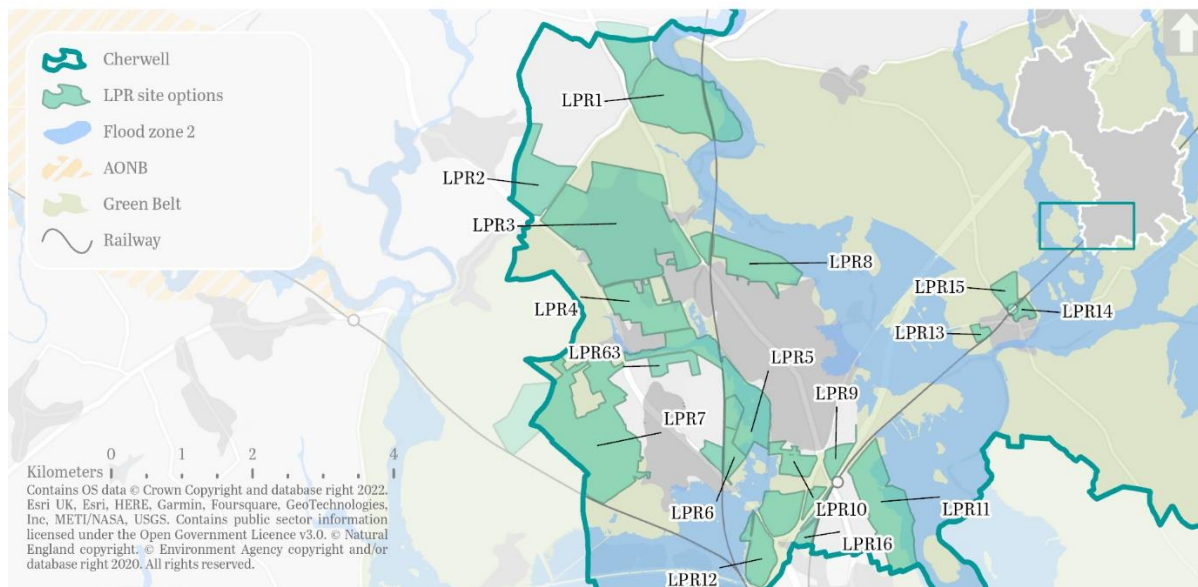
Two reasonable housing growth scenarios for the Bicester sub-area

Site	Scenarios		Notes on assumptions etc.
	1	2	
LPR37	500	500	Masterplanning needed to address Chesterton and sustainable transport.
LPR21	800	800	Will need to consider possibility of containing growth west of B'thorn Hill.
LPR34	1,000	1,000	Clarity required regarding implications for the adopted Ecotown concept.
LPR39	-	1,000	A range of challenges / uncertainties, given proposed 2,800 home scheme.
Total	2,300	3,300	Commitment to strategic growth at Bicester must be kept under review.

Kidlington

5.4.45 As per the discussion in Section 5.2, there are certain arguments for directing further strategic growth to the Kidlington area, relating to: proximity to Oxford, an established and growing employment offer that contributes significantly to the success of the wider Oxfordshire Knowledge Spine; and strong transport connectivity. Also, Kidlington itself (as opposed to the wider sub-area, including Yarnton/Begbroke and the Oxford-edge) is associated with notably low recent / committed growth, as a percentage increase in dwelling stock, in comparison to Banbury and Bicester, which is potentially a factor influencing relatively high house prices. However, on the other hand, the majority of the area falls within the Oxford Green Belt, and across the wider sub-area there is considerable committed growth following the Partial Review (2020).

Figure 5.19: Strategic site options at Bicester



5.4.46 Strategic site options can be categorised as follows:

- The edge of Woodstock
- The edge of Oxford
- Yarnton / Bebroke
- Kidlington
- Islip
- New settlement options

5.4.47 Each of these areas / categories is considered in turn below.

The edge of Woodstock

5.4.48 **LPR2** is notably located outside of the Green Belt, and is well-connected in transport terms, given: a location at the intersection of the A44 (a key strategic public transport and cycling corridor) and the A4095, which links to Bicester and Witney; and excellent potential to cycle to employment opportunities (Langford Lane / Oxford City Airport). The site is quite well-contained in landscape terms, in that it is bounded to the west by the Woodstock urban edge (a site under construction) and by roads on the other sides (along with thick hedgerows / tree belts). However, an issue is that the site contains a scheduled monument (Blenheim Villa) as well as a wider area of archaeological interest at its western extent, plus there is significant noise pollution associated with the road junction. The implication is that there is a clear need to focus built form at the northeast corner of the site, and deliver a large area of greenspace across the remainder of the site. This is the approach reflected in a current planning application for 500 homes (ref. [22/01715/OUT](#)), although officers believe an appropriate capacity could be lower, at ~450 homes (N.B. the site has a longer planning history, including a 2014 application for 1,500 homes, plus land for a primary school, across both this site and the site now under construction to the east).

- 5.4.49 The current planning application would involve 67% green / open space within the site, and this would also have the benefit of largely avoiding concerns regarding impacts to nearby Blenheim Palace World Heritage Site. However, the effect will be to separate the new community from Woodstock, the centre of which is at the western extent of the town (~1.5km distant). This could be deemed appropriate, given that the built form would be quite well contained (i.e. the scheme would represent something of a “one off”, as opposed to reflecting a strategy for lower density expansion).
- 5.4.50 However, a key issue is access to a primary school, as there would be no potential to deliver one onsite. Further work is needed to identify the most appropriate strategy.

The edge of Oxford

- 5.4.51 There are three LPR sites here, which are judged to perform poorly. Taking the sites from west to east:
- **LPR12** – land to the west of the A34 is isolated from Oxford (specifically the committed Oxford North mixed use strategic urban extension) by the Peartree Interchange, nor would it link to Kidlington, given that adjacent land (within both LPR12 and a Partial Review allocation) is reserved for a golf course. This is particularly the case given that the masterplan for Oxford North (on the basis of the outline planning permission, [18/02065/OUTFUL](#)), proposes employment land at its northwest extent (adjacent to the A34). Also, the site is constrained by proximity and functional links to the Oxford Meadows SAC and the Oxford Canal Conservation Area, and this parcel of land could potentially contribute to green infrastructure connectivity between the Thames and Cherwell river corridors, in combination with the Golf Course reserve site and the proposed strategic greenspace southeast of Kidlington (LPR9). The site might be better suited to employment, but visual links to the Oxford Canal would likely be a constraint. With regards to the golf course reserve site itself, whilst the need for a golf course has yet to be confirmed, at the current time it is too early to consider any alternative use. Finally, development within the remaining eastern part of LPR12 would be isolated from the committed north Oxford urban extension, given intervening transport infrastructure and priority habitat, plus there is a general need to consider the importance of a landscape / Green Belt gap between Oxford and Kidlington.
 - **LPR16** – was removed from the Green Belt through the Partial Review, but is clearly constrained by the adjacent strategic transport infrastructure. The land would likely link to current development within Oxford City, as opposed Partial Review allocation 6b (670 homes) to the east, given the railway line. As such, the development of the site will be dependent on integration with proposals in Oxford City. The emerging City Plan to 2040 proposes housing development at Pear Tree Farm.
 - **LPR11** – would involve extending Partial Review allocation 6a (690 homes plus a local centre and a primary school). There is an argument for this on account of the adjacent Parkway station, and because the River Cherwell flood risk zone might form a long term defensible Green Belt boundary. However: an extended scheme would deliver little over-and-above the committed scheme, other than additional housing; it is generally the case that issues / options in this area were considered at the time of preparing the Partial Review, and the committed scheme involves a proposal for new greenspace to form a defensible Green Belt boundary, and also mindful of heritage assets at St. Frideswide Farm (including a Grade II* listed farmhouse). The Landscape Study assigns LPR11 only ‘medium’ sensitivity; however, there is a clear sensitivity regarding encroachment on the River Cherwell corridor (mindful that public accessibility along the river corridor could potentially be enhanced in the future). An expanded scheme drawing on field boundaries and/or the flood risk zone as a defensible boundary (also mindful of significant surface water flood zones) could feasibly be explored, but the effect would be to delay the scheme coming forward and delivering much needed new housing for Oxford).

Yarnton / Begbroke

- 5.4.52 Beginning with **LPR63**, this is strongly supported for employment, specifically an extension to Begbroke Science Park, with the land having been removed from the Green Belt and safeguarded for employment through the Partial Review. The six remaining sites perform relatively poorly. From west to east:
- **LPR7** – comprises planned greenspace and ‘retained agricultural land’ within Partial Review allocation PR9, as well as land to the west. The option of further growth in this direction is not supported from a range of perspectives - including Green Belt, landscape and biodiversity – mindful of the close consideration given to issues / opportunities and options through the Partial Review process.

- **LPR4** – would involve extending Begbroke to the north, and closing the gap to the Langford Lane employment area. There are two fields feasibly in contention for allocation, with the western field constrained by airport flight path, such that it likely only comes into contention for employment land. The eastern field might deliver housing and/or employment, but is sensitive from a Green Belt perspective (albeit the landscape study assigns only ‘low-medium’ sensitivity), and is within ~200m of a SSSI. A third and final part of the site comprises current built form, including an ambulance station.
- **LPR5** – is strongly associated with planned strategic green / open space and the Rowel Brook corridor.
- **LPR6** – comprises a number of component parts:
 - The northern-most section would be separated from planned built form to the west by the railway line, and would abut strategic greenspace to the east, such that this land contributes strongly to Green Belt purposes. The indicative location for a train station /halt is adjacent; however, the station is a developer aspiration, with Partial Review allocations not dependent on its delivery. There are a range of planned or potential upgrades for this line / services along the line (see the [Oxfordshire Rail Corridor Study, 2021](#)), and associated infrastructure (including a realigned Sandy Lane / new Sandy Lane crossing).
 - Land to the south comprises the site of a former sewage treatment works, and again would not directly link to current or planned built form, given the railway line. There is also a sensitive railway line crossing to the south, and some established habitats onsite.
 - Land to the south is again on the ‘wrong side’ of the railway line, such that it is somewhat sensitive in Green Belt terms and would not link well to Yarnton. The part of the site abutting the A44 is currently in an industrial/commercial use, and could potentially be considered for an intensification of this use, but it is not clear that the land is available and, in any case, any development would be non-strategic.
 - Land to the west of the railway line was removed from the Green Belt and safeguarded through the Partial Review. However, there are sensitivities onsite, in the form of sports pitches (for which there is a need locally) and two listed buildings (one a pub) with mature gardens including many mature trees. The eastern part of the site is relatively unconstrained, but would not deliver a strategic allocation.
- **LPR10** – feasibly comes into consideration as the Green Belt Study (2022) identifies that the land makes a more limited contribution to Green Belt purposes. However, the land comprises sports pitches (for which there is an identified need) and a planned nature conservation area (Policy PR7b).
- **LPR9** – is proposed for strategic green / open space, through Policy PR7a, and this is reflected in a current planning application for 370 homes (ref. [22/00747/OUT](#)).

Kidlington

- 5.4.53 The primary site to consider here is **LPR8**, where the Green Belt study (2022) notably concludes only a ‘moderate’ (land closest to the settlement boundary) and ‘moderate-high’ (adjacent to the river corridor) contribution to Green Belt purposes. Furthermore, the option of development here has merit in wider planning and sustainability terms, such that there is potential to demonstrate exceptional circumstances for Green Belt release. In particular, the site benefits from excellent proximity and walking/cycling connectivity to strategic employment land (Langford Lane / Oxford City Airport, also Begbroke Science Park) and Kidlington centre. Also, there is an argument for housing growth at Kidlington, which is associated with relatively low recent and committed housing growth, as a proportion of dwelling stock, relative to Banbury and Bicester, which could have a bearing on relatively high house prices (also, anecdotal evidence suggests a prevalence of properties being sub-divided), albeit there is high committed growth in the wider sub-area. As well as a need to ensure a new defensible Green Belt boundary, and avoid encroachment on the River Cherwell corridor, a key sensitivity is the Kidlington Conservation Area, which abuts the site to the east, including a prominent grade 1 listed church. There is also a need to consider the Oxford Canal, to the west, where a Grade II listed canal bridge is linked to the conservation area by a historic footpath that passes adjacent to the site, via a Grade II listed railway bridge.
- 5.4.54 The other LPR site in this area is **LPR3**, which comprises the entirety of Oxford City Airport. There is an argument for reviewing the Green Belt to remove existing employment land, and there is also the option of considering a modest eastwards expansion of this thriving employment area into the Green Belt, noting that some of the land here makes only a ‘moderate’ contribution to Green Belt purposes. With regards to the wider airport, this is not a realistic option at the current time, including as the airport is well-used, serving an extensive area (e.g. Silverstone) and with a clear role in the local economy. The airport benefits from permitted development rights, supportive of airport related development.

Figure 5.20: The Partial Review Key Diagram



Islip

- 5.4.55 The focus here is on the three small-scale LPR sites – namely LPR13, LPR14 and LPR15 – with the option of large-scale strategic growth (potentially in the form of a new settlement) discussed below.
- 5.4.56 Of these three sites, **LPR15** is judged to perform relatively poorly, given Green Belt sensitivity, albeit the site is previously developed (specifically a fuel depot, with structures still onsite). The other two sites – **LPR13** and **LPR14** – make a ‘moderate-high’ contribution to Green Belt purposes, according to the Green Belt Study (2022), and it is LPR14 that appears to be preferable site in transport terms, given that it is near adjacent to the train station and the primary school, and because there is the potential to reach the A34 without needing to pass through the conservation area (or, at least, its core). However, the site has been discussed as having a capacity of between 40-170 homes (mindful of an onsite grade 2 listed farmhouse, and also the near adjacent conservation area), such that it may well not be a strategic site in the district-wide context (and it is not clear that the site would deliver any strategic benefit to Islip, other than new housing). Islip appears not to have seen any significant housing development for at least 20 years (on the basis of clear satellite imagery from 2004) and, indeed, from a review historic OS maps it appears that the only significant housing growth for perhaps 50 or more years has involved a small number of homes (circa 30-40) to the west of the railway line. Another consideration is potentially around reaching / breaching capacity at the village primary school (the views of OCC on this matter would be welcomed).

New settlement options

- 5.4.57 Section 5.2 explains that there is limited strategic argument for a new settlement, but also that there are a range of housing and employment growth quanta options that must be taken into consideration. It is more challenging to rule out the option of a new settlement under higher growth scenarios.
- 5.4.58 There is a long list of three new settlement options feasibly in contention: Weston-on-the-Green, Islip and Shipton Quarry. However, Weston-on-the-Green has already been discussed above, and is considered to be the sequentially least preferable option of the three, particularly on transport grounds, albeit it is located outside of the Green Belt, whilst the other two sites are located within the Green Belt.
- 5.4.59 This leaves two options associated with the Kidlington sub-area: Islip (**LPR15**) and Shipton Quarry (**LPR1**). Both are associated with a wide range of issues / opportunities; however, on balance, Shipton Quarry is considered to be the preferable option to explore further. Islip already benefits from a rail station, whilst the proposal at Shipton Quarry is to deliver a new station; however, there are clear Green Belt and historic environment sensitivities at Islip; and, whilst flood risk zones could assist with containment, there are challenges associated with slightly raised land directly to the northwest of the village and the former fuel depot directly to the northeast. There are clear sensitivities at Shipton Quarry, including as the site is designated as a Local Wildlife Site (LWS) and a geological SSSI; however, the site benefits from being located at the edge of the Green Belt, with part of the site associated with relatively low Green Belt sensitivity; and the potential for sensitive development that addresses the biodiversity / geology constraint can be envisaged. Much detailed work has been undertaken in support of proposals at both locations, with quite a wide range of options explored, serving to highlight the challenging nature of the sites. Focusing on Shipton Quarry, the most recent proposal is for 2,500 homes, with the potential for a second phase extending the site further to the west also discussed; however, there is a concern that insufficient consideration is given to the onsite constraints, and so it is judged appropriate to assume 2,000 homes.

Conclusion

- 5.4.60 In conclusion, there is strong support for allocation of LPR2, to the east of Woodstock, for 450 homes, albeit the site is not without its issues, perhaps most notably in terms of access to a primary school, which will need to be a focus of further discussions, testing etc. There is also strong support for an extension to Begbroke Science Park (LPR63). Allocation of these two sites only is a reasonable growth scenario.
- 5.4.61 However, it is also appropriate to test a higher growth scenario involving additional allocation of LPR8, to the north of Kidlington (300 homes), mindful of Kidlington-specific (housing needs) and site specific factors (the site performs well in a number of respects).
- 5.4.62 Furthermore, it is reasonable to progress the option of a new settlement at Shipton Quarry (LPR1) for testing. It is also reasonable to assume that LPR1 and LPR8 would not be allocated in combination.
- 5.4.63 In **summary**, and focusing only on housing, there are three reasonable scenarios involving: **A**) allocation of LPR2 for 450 homes over-and-above completions and commitments; **B**) scenario (A) plus additional allocation of LPR8 for 300 homes; and **C**) scenario (A) plus additional allocation of LPR1 for 2,000 homes.

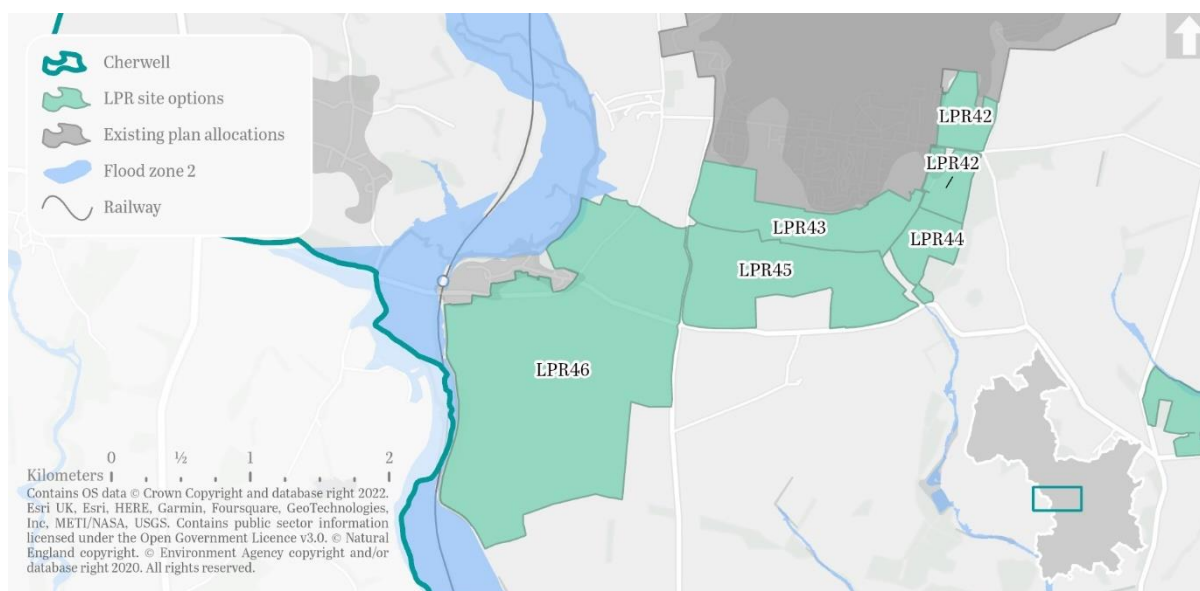
Three reasonable housing growth scenarios for the Kidlington sub-area

Site	Scenarios			Notes on assumptions etc.
	1	2	3	
LPR2	450	450	450	A number of issues to explore further, notably access to a primary school.
LPR8	-	300	-	A Green Belt site, but allocation is supported from a number of perspectives.
LPR1	-	-	2,000	Considerable uncertainty regarding extent / size and configuration of scheme.
Total	450	750	2,450	Sub-area is constrained by Green Belt, but there are arguments for higher growth

Heyford Park

- 5.4.64 It is relatively straightforward to arrive at reasonable growth scenarios for Heyford Park, relative to the three sub-areas discussed above. There are clear arguments for exploring additional growth, and any further additional growth must be comprehensive rather than piecemeal; however, there is also a need to consider the option of no further growth at Heyford Park, e.g. noting relatively poor transport connectivity.
- 5.4.65 With regards to the site options in contention, there is clear support for testing the option of allocating **LPR42, LPR43 and LPR44** in combination for 1,235 homes, which would take the total number of homes at Heyford Park to around 4,000. Allocation of these sites in combination could achieve a new defensible long term boundary, and could be supportive of the site promoter’s long term vision to invest in sensitive, heritage-led intensification within the more challenging parts of the airfield conservation area (the promoters suggest that the settlement might ultimately comprise around 5,500 – 6,000 homes).
- 5.4.66 The southern boundary to LPR43 is not strong, and land is available to the south (**LPR45**); however, LPR45 is more sensitive in landscape terms and historic environment terms. The southern extent of Heyford Park is discussed in Section 6.
- 5.4.67 Finally, there is a need to briefly mention **LPR46**, which is judged to perform very poorly, relative to other growth options, given the majority of the site being within the Rousham, Lower Heyford and Upper Heyford Conservation Area, plus there are wider constraints associated with the Cherwell Valley.

Figure 5.21: Strategic site options at Heyford Park



- 5.4.68 In **summary**, there are two reasonable growth scenarios involving: **A)** no further allocation; and **B)** allocation of LPR42, LPR43 and LPR44 for 1,235 homes over-and-above completions and commitments.

Two reasonable housing growth scenarios for Heyford Park

Site	Scenarios		Notes on assumptions etc.
	1	2	
LPR42, 43 & 44	-	1,235	Need to consider in a broader context (temporal and geographical)
Total	0	1,235	Leading ~4,000 homes in total (promoters also suggest a longer term vision)

The rural area

- 5.4.69 As discussed in Section 5.2, there are broad strategic **arguments for supporting housing growth** across the rural area. These primarily relate to the need to maintain vibrant rural communities, with a balanced population, and maintaining the vitality of village centres and services/facilities more generally. For example, declining birth rates nationally (see ONS data [here](#)) can create a challenge for maintaining school rolls in rural areas, particularly if combined with a reduction in children from towns attending schools in rural areas (e.g. because a new school has opened in the town). For example, Islip is discussed, above, as a rural settlement that has seen very limited housing growth over recent years and decades.
- 5.4.70 However, and as discussed in Section 5.2, there are also broad strategic **arguments for limiting housing growth** in the rural area, particularly from a transport and, in turn, decarbonisation perspective. It is recognised that there is an ongoing national switch-over to electric vehicles, but EVs are not without their issues, including from a perspective of greenhouse gas emissions and traffic congestion / road safety. Also, there is a need to be mindful that recent and committed growth across the rural villages is highly variable, particularly as some villages have seen recent ‘speculative’ development (see para 5.2.43).
- 5.4.71 Broad strategic arguments for higher versus lower growth were also explored through a formal alternatives appraisal at the time of the Options consultation (2021; see Section 7 of the ISA Report), which concluded:
- “Option 1 [lower growth] is preferable in respect of certain environmental topics, where the rural area is relatively constrained, or faces particular growth-related issues. Specifically, Option 1 is judged to be preferable in respect of air quality, climate change mitigation, the historic environment and transport (with several of these issues are inter-related, namely issues relating to air quality, climate change mitigation and transport). As for Option 2 [higher growth], this is supported in respect of ‘housing’ objectives, primarily because significant rural housing needs are thought likely to exist.”*
- 5.4.72 The emerging view is that the LPR should make provision for growth of around 500 homes at non-strategic sites across the rural area over the 20 year plan period, over-and-above completions and commitments. The matter of distribution and specific sites will then be a focus of further work subsequent to the current consultation. One key consideration will be the following conclusion of the Transport Assessment (2022):
- “The second highest level of connectivity are villages located close to the major road network in close proximity to the two largest towns. Bloxham to the south-west of Banbury is located on the A361 with good bus and cycle links. With key employment centres nearby and good bus links Ambrosden to the south east of Bicester scores well. Similarly, located south of Bicester is Wendlebury which also scores highly. This is largely due to its proximity to connections along the A41 and the national cycle route which runs through the village. The lower score reflects the challenge that connectivity may be limited to fewer travel modes. Chesterton... Bodicote and Twyford / Adderbury... also score relatively well.”*
- N.B. Bloxham has seen significant housing growth over the past ~10 years, including sites permitted at appeal, although there is no significant committed growth. Ambrosden is associated with significant committed growth, plus nearby recent / committed / potential future strategic growth (inc. Graven Hill). Wendlebury is discussed above a location where there is the option of considering strategic growth.
- 5.4.73 A strategy involving 500 homes across the rural area (over and above completions and commitments) is considered to represent a strategy that strikes an appropriate balance. Lower growth (e.g. 250 homes) and/or higher growth (e.g. 750 homes) could feasibly be appraised, but it would be challenging to draw meaningful conclusions without knowledge of the specific sites involved, whilst broad / high-level arguments in favour of lower growth versus higher growth are quite well-understood, as discussed.
- 5.4.74 In summary, there is only one reasonable growth scenario for the rural area, at the current time, involving support for 500 homes at non-strategic allocations, over-and-above completions and commitments.

One reasonable housing growth scenario for the rural area

Site	Scenarios		Notes on assumptions etc.
	1	2	
Non-strategic allocations	-	500	The matter of supply from non-strategic sites in the rural area will be revisited subsequent to the current consultation, including with consideration given to the possibility of delegating allocation to neighbourhood plans.
Total	0	500	

5.5 Reasonable growth scenarios

Introduction

- 5.5.1 Having gone through a process (see Figure 5.1) involving consideration of strategic factors (Section 5.2), site options (Section 5.3) and settlement scenarios (Section 5.4), the final task is to draw together the understanding generated in order to arrive at a single set of reasonable growth scenarios for appraisal and consultation (so as to discharge a central requirement of the SA process, as understood from Regulation 12(2) of the SEA Regulations, which is to appraise and consult upon “reasonable alternatives”).
- 5.5.2 In practice, this involves considering ways of combining the sub-area scenarios introduced above, also mindful that additional supply will come from completions and commitments (20,654 homes) and from windfall sites (2,800 homes).¹⁴ Total supply from these sources is 23,454 homes.

Combining sub-area scenarios

- 5.5.3 A summary of the reasonable sub-area scenarios is presented in Table 6.1. N.B. for the Kidlington sub-area, it is appropriate to differentiate between Green Belt (LPR8 and LPR1) and non-Green Belt (LPR2).
- 5.5.4 In summary, there is:
- one reasonable growth scenario for the Banbury sub-area, for the non-Green Belt part of the Kidlington sub-area and the rural sub-area;
 - two reasonable growth scenarios for the Bicester sub-area and Heyford Park; and
 - three reasonable growth scenarios for the Green Belt part of the Kidlington sub-area.

Table 6.1: Summary of the sub-area scenarios

Sub area		Scenarios
Banbury		One scenario: 1,320 homes
Bicester		Two scenarios: 2,300 or 3,300 homes
Kidlington	Green Belt	Three scenarios: 0, 300 or 2,000 homes
	Non- Green Belt	One scenario: 450 homes
Heyford Park		Two scenarios: 0 or 1,235 homes
Rural area		One scenario: 500 homes
Total over-and-above completions, commitments and windfall	Minimum	4,570 homes
	Maximum	8,805 homes

- 5.5.5 There are 12 feasible combinations of the sub-area scenarios introduced above (three scenarios for Kidlington Green Belt, combined with four scenarios (2 x 2) for Bicester and Upper Heyford).
- 5.5.6 All would deliver a total quantum of homes that is arguably reasonable, in light of the discussion presented in Section 5.2. There is an argument for ruling out the scenario that would see support for Shipton Quarry ahead of higher growth at Bicester or further growth at Heyford Park; however, on balance these options are ‘kept in the mix’, for completeness.
- 5.5.7 A final consideration is employment land, with options / scenarios discussed in Box 5.1. The conclusion of the discussion presented in Box 5.2 is that there is only one reasonable scenario.
- 5.5.8 As such, there are **12 reasonable growth scenarios**.

¹⁴ Completions are sites that have been delivered since the start of the plan period. Commitments are sites with planning permission (either full or outline) or an existing allocation. Windfall sites are those that can be anticipated to come forward despite not having an allocation in the plan, because they are otherwise in accordance with policy, typically within settlement boundaries.

Conclusion

5.5.9 The 12 growth scenarios are presented in Table 5.2 and cross the subsequent maps. These are the 'reasonable' growth scenarios, for appraisal and consultation, at the current time. This is on the basis of the process set out across this section of the report as a whole (as summarised in Figure 5.1).

5.5.10 Final points to note are as follows:

- There is invariably a need to make simplifying assumptions in order to arrive at a manageable number of scenarios, given the aim of arriving at scenarios that reflect the objectives of the plan (such that they are essentially in the form of alternative key diagrams). A key motto is that "*the phrase all reasonable alternatives does not equate to all conceivable alternatives*",¹⁵ and there is clear precedent on the need for proportionality, in respect of the task of arriving at reasonable alternatives.
- 12 growth scenarios is more than ideal, from a perspective of seeking to support understanding and engagement. At the next stage the aim will be to arrive at fewer scenarios.
- A number of the potential supply components discussed above are associated with a degree of uncertainty at this stage, but there will be greater certainty following consultation. The reasonable alternatives will be updated / refined subsequent to the current consultation / prior to the Regulation 19.

Box 5.2: Employment land supply options / scenarios

The Housing and Economic Needs Assessment (HENA, 2022) identifies that there is a headline need for around 225ha (specifically, between 220.6 and 229.7ha) of new employment land over the plan period, albeit there are naturally uncertainties / error bands involved, given a range of assumptions made within the HENA regarding the most appropriate approach to modelling economic growth across each of the headline sectors: office; R&D; industry; and warehousing.

Completions and commitments total ~150 ha, and it is reasonable to assume that around 15 ha will be identified at non-strategic sites subsequent to the current consultation (see discussion in Box 5.1). As such, the residual figure to be provided for through LPR allocations is at least ~60ha (recalling arguments for identifying a supply that exceeds needs). Also, there is a need to account for objectives over-and-above meeting the headline target figure, particularly in respect of: meeting needs for each of the four headline sectors; meeting locally arising needs; and supporting wider objectives (e.g. there is a need to diversify the employment land offer at Bicester).

The discussion above has identified emerging **preferred allocations totalling 69 ha**, albeit there is a degree of uncertainty at this stage, particularly in respect of the net effect of employment growth at Canalside, Banbury. The proposed allocations are presented concisely in Section 9. This is a reasonable employment land scenario.

However, there are **arguments for higher growth**.

When considering strategic employment land omission sites, there is relatively limited argument for considering sites at Bicester, where the emerging preferred allocations would contribute to an overall high employment growth strategy, and there is little or no opportunity at Heyford Park, aside from supporting effective and sensitive reuse of existing buildings within the conservation area. With regards to the Kidlington area, there are omission sites that could deliver on employment growth objectives, but these sites are constrained by the Green Belt.

This leaves Banbury, where attention focuses on the option of further strategic employment land to the east of the M40. This is a highly desirable location for warehousing and distribution uses (albeit the market for such uses could be subject to change over coming years). However, such uses are relatively footloose, e.g. in contrast to industries associated with the Oxford Knowledge Spine. There is little reason to suggest that failing to support new warehousing / distribution uses at Banbury would be to the detriment of sub-regional objectives, because the sub-regional need could likely be met elsewhere.

Taking this into account alongside understanding of the constraints to development east of the M40 at Banbury (also an understanding that a new link road would deliver limited strategic benefit to Banbury), as discussed in Section 5.4, it is considered reasonable to rule out the option of a strategic land allocation here, even under higher housing growth scenarios. A priority for Banbury is providing for locally arising needs and delivering employment land associated with town centre regeneration.

¹⁵ See <https://www.aylesburyvaledc.gov.uk/sites/default/files/2020/01/2020Report.pdf#page=43>

Table 5.2: The reasonable growth scenarios (with constants greyed-out and high growth indicated with blue text)

Scenario		1	2	3	4	5	6	7	8	9	10	11	12	
Completions / commitments ¹⁶		20,654	20,654	20,654	20,654	20,654	20,654	20,654	20,654	20,654	20,654	20,654	20,654	
Windfall ¹⁷		2,800	2,800	2,800	2,800	2,800	2,800	2,800	2,800	2,800	2,800	2,800	2,800	
Strategic Allocations	Banbury	1,320	1,320	1,320	1,320	1,320	1,320	1,320	1,320	1,320	1,320	1,320	1,320	
	Bicester	2,300	3,300	2,300	3,300	2,300	3,300	2,300	3,300	2,300	3,300	2,300	3,300	
	Kidlington	GB	0	0	0	0	300	300	300	300	2,000	2,000	2,000	2,000
		Non-GB	450	450	450	450	450	450	450	450	450	450	450	450
	Heyford Park	0	0	1,235	1,235	0	0	1,235	1,235	0	0	1,235	1,235	
Rural area		500	500	500	500	500	500	500	500	500	500	500	500	
Total new homes		28,024	29,024	29,259	30,259	28,324	29,324	29,559	30,559	30,024	31,024	31,259	32,259	
Per annum (pa)		1401	1451	1463	1513	1416	1466	1478	1528	1501	1551	1563	1613	
% over 1,292 pa*		8	12	13	17	10	13	14	18	16	20	21	25	

* As discussed in Section 5.2, there is a clear argument for setting the housing requirement at 1,292 dwellings per annum (dpa). This would mean a supply buffer ranging from 8% (Scenario 1) to 25% (Scenario 12).¹⁸

A supply buffer of 8% would risk being too small, and this is highlighted by **amber** shading, whilst a supply buffer of 24% is potentially more than is needed, hence the **dark green** shading.

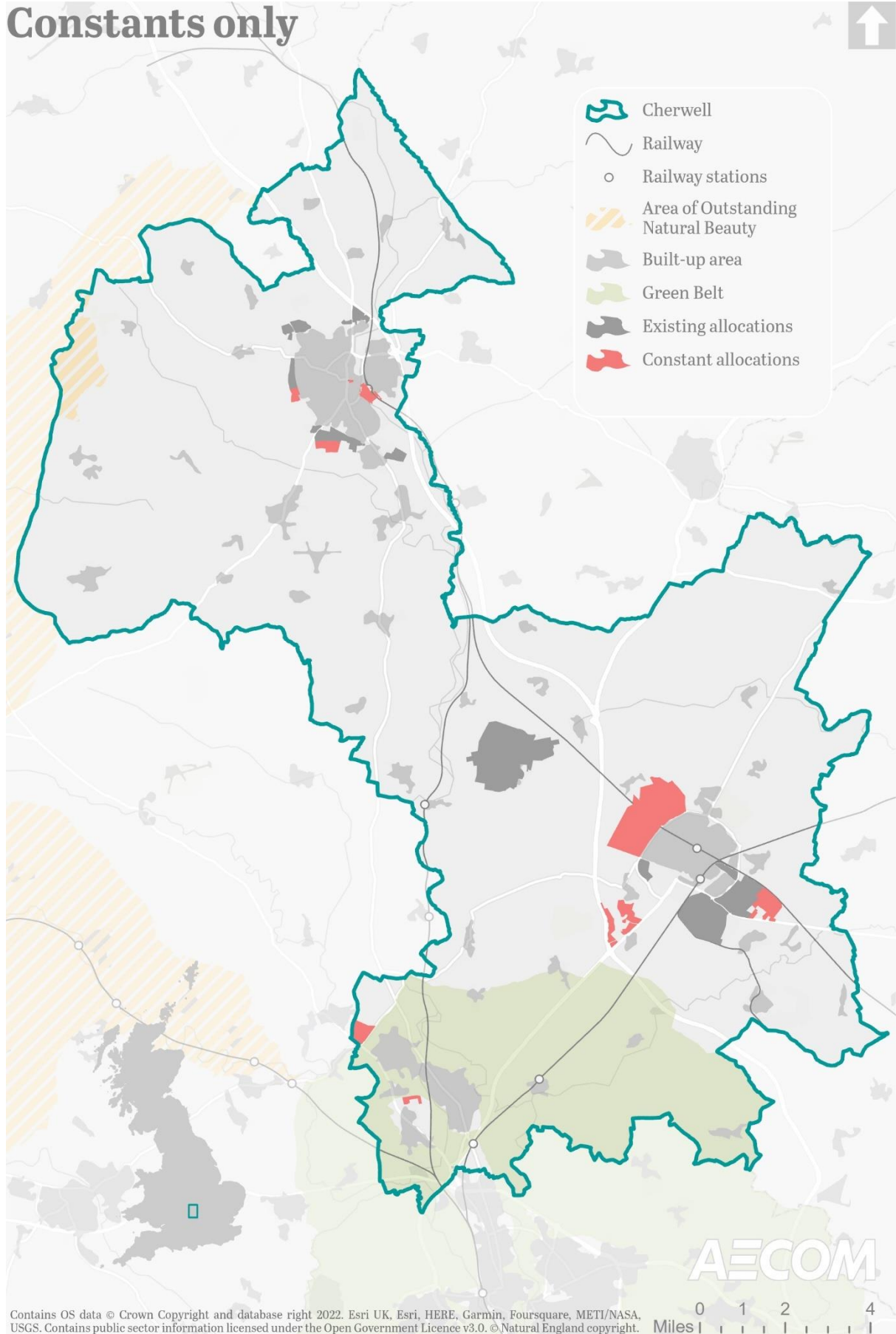
However, as discussed in Section 5.2, there are also arguments for setting the housing requirement at figures above and below 1,292 dpa. For example, under Scenario 1, the Council might choose to set the housing requirement at 1,250 dpa (the supply buffer would then become 12%); or under Scenario 12, the Council might choose to set the housing requirement at 1,400 dpa (the supply buffer would then become 15%).

¹⁶ Completions total 2,367 homes, whilst commitments total 18,287 homes. Commitments break down as 12,112 homes from existing Local Part 1 allocations, 4,400 homes from the Partial Review allocations and 1,775 homes from planning permissions at sites without a local plan allocation.

¹⁷ Windfall breaks down as 1,500 homes small site windfalls (1-4 dwellings) and 1,300 homes large site windfalls (5+ homes).

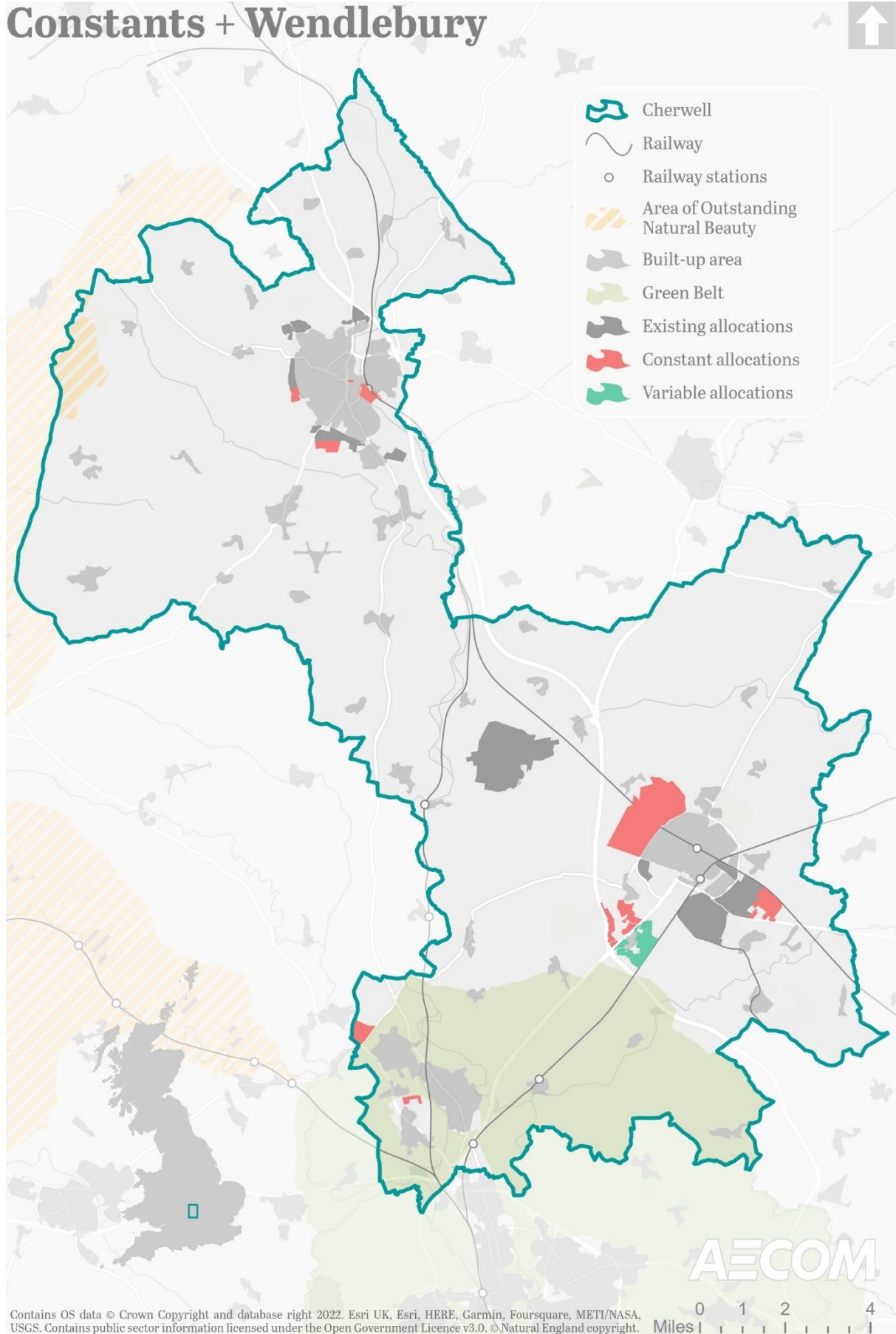
¹⁸ There is generally a need to provide for a supply contingency, or 'buffer', over-and-above the housing requirement to ensure that the requirement is met in practice over the plan period (recognising that unforeseen issues with local plan supply are likely), and ensure a robust supply trajectory, i.e. a situation whereby a five year housing land supply (5YHLS), as measured against the housing requirement, can be maintained throughout the entire plan period. A more straightforward situation might involve a steady housing trajectory; however, there is flexibility to set a 'stepped' housing requirement / trajectory, where necessary. A stepped trajectory, for example, may set the requirement below the annualised total plan period requirement in the early years of the plan, and then this is compensated for in the latter years of the plan. Ensuring that the housing requirement (whether straight-line or stepped) is met in practice over the plan period is important, as otherwise the Council risks failing to be able to demonstrate a five year supply of deliverable housing sites against the target, at some point in the plan period, or failing the Housing Delivery Test, and hence risks being subject to the presumption in favour of sustainable development (NPPF para 11).

Constants only

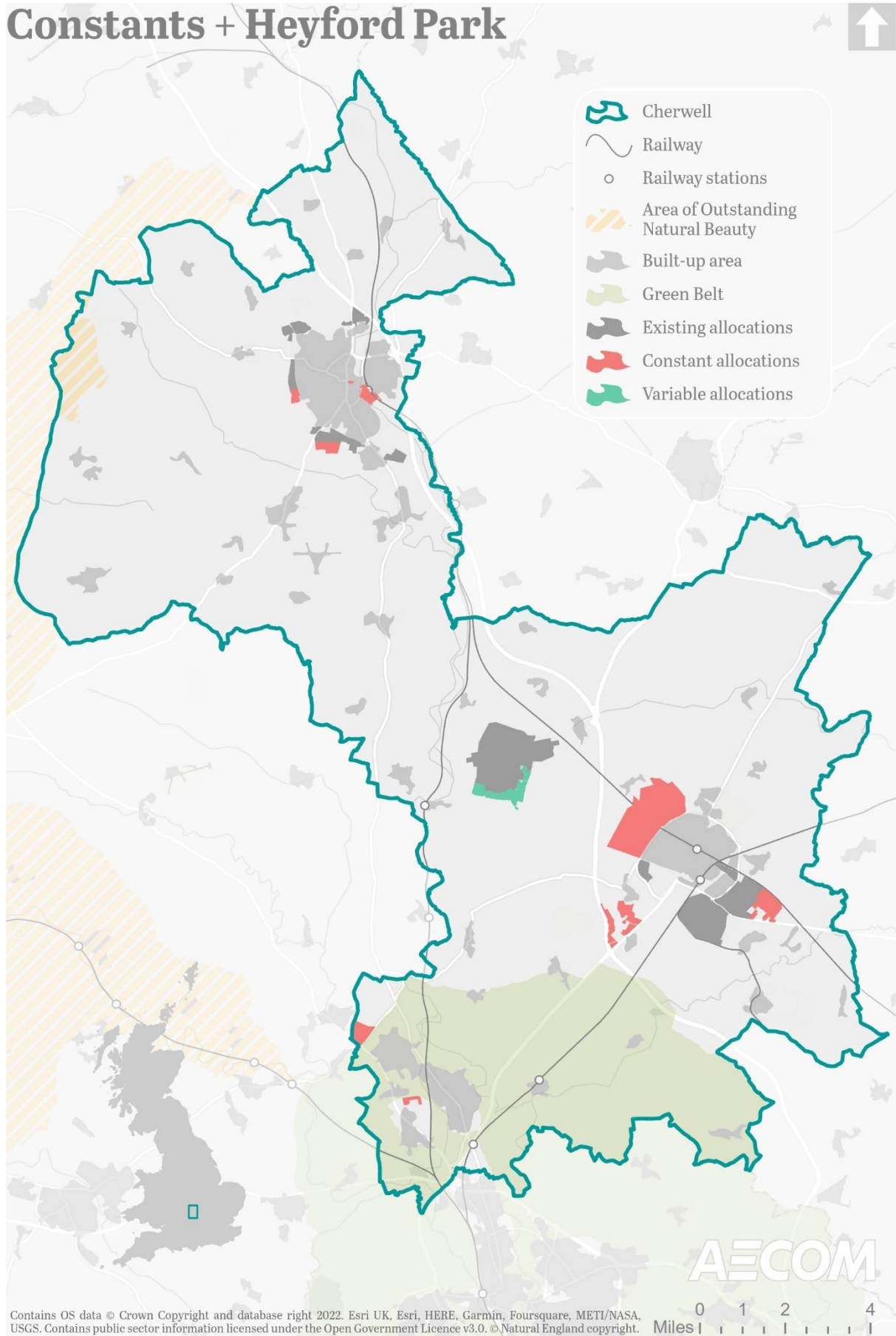


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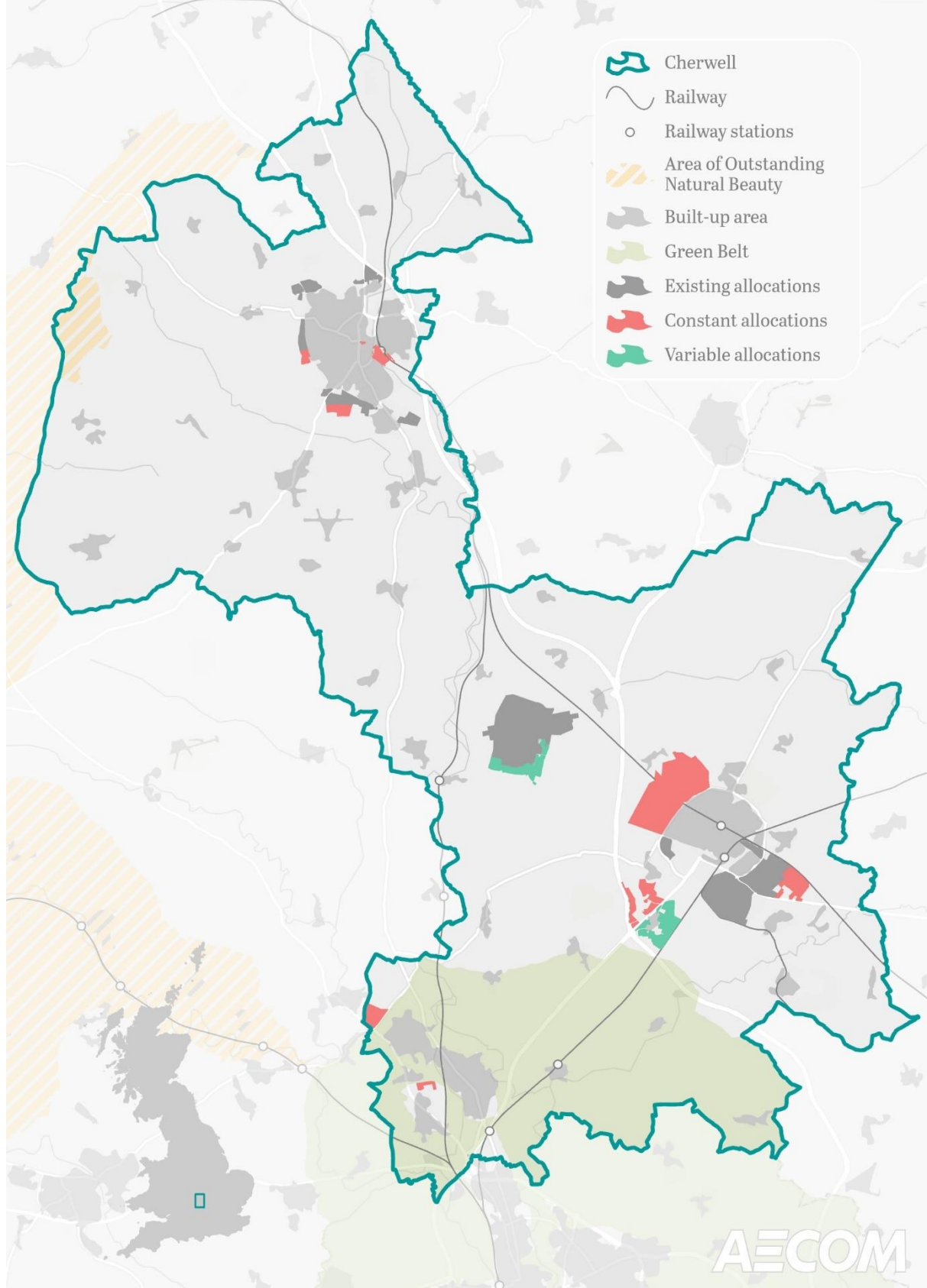
Constants + Wendlebury



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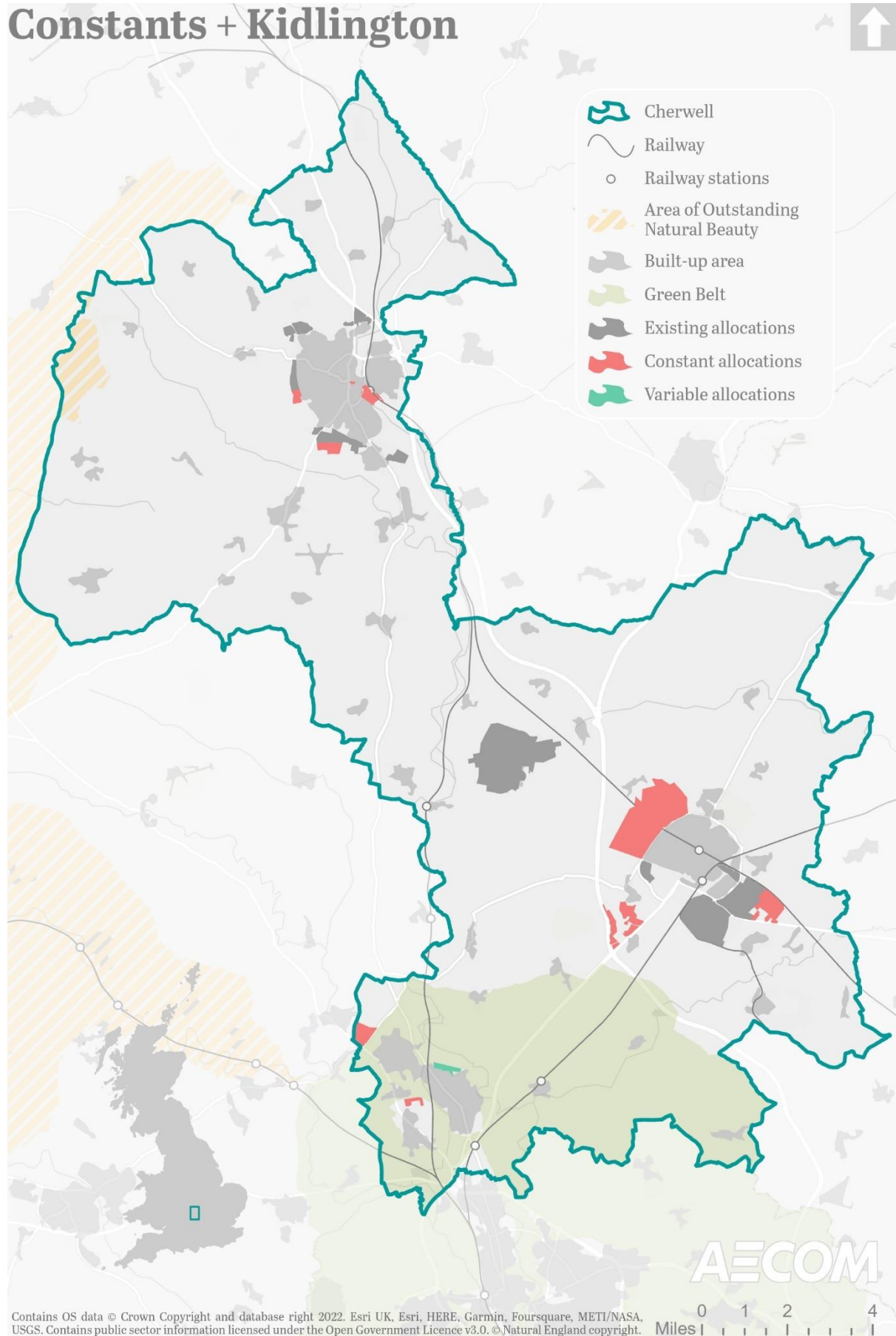


Constants + Wendlebury + Heyford Park

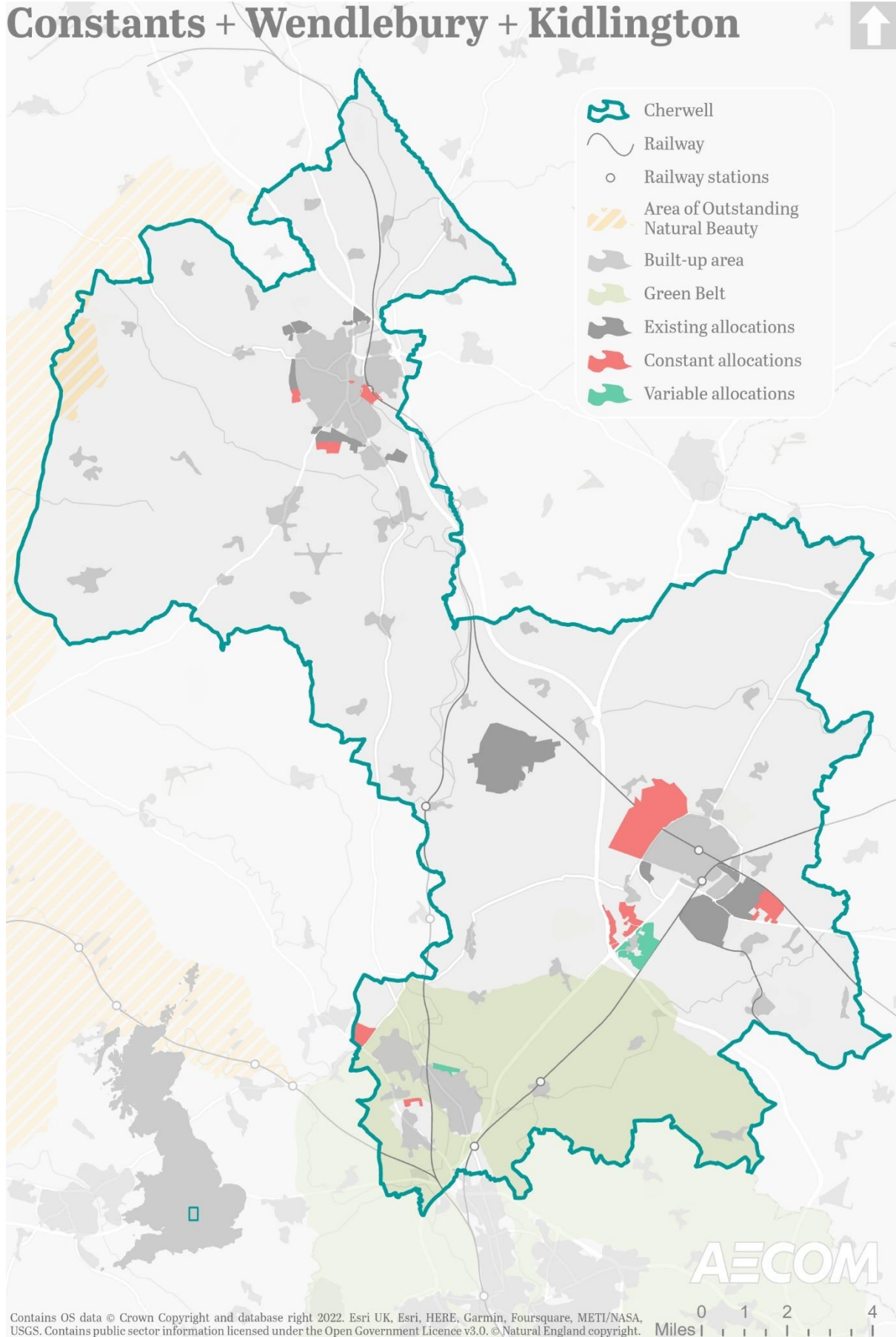


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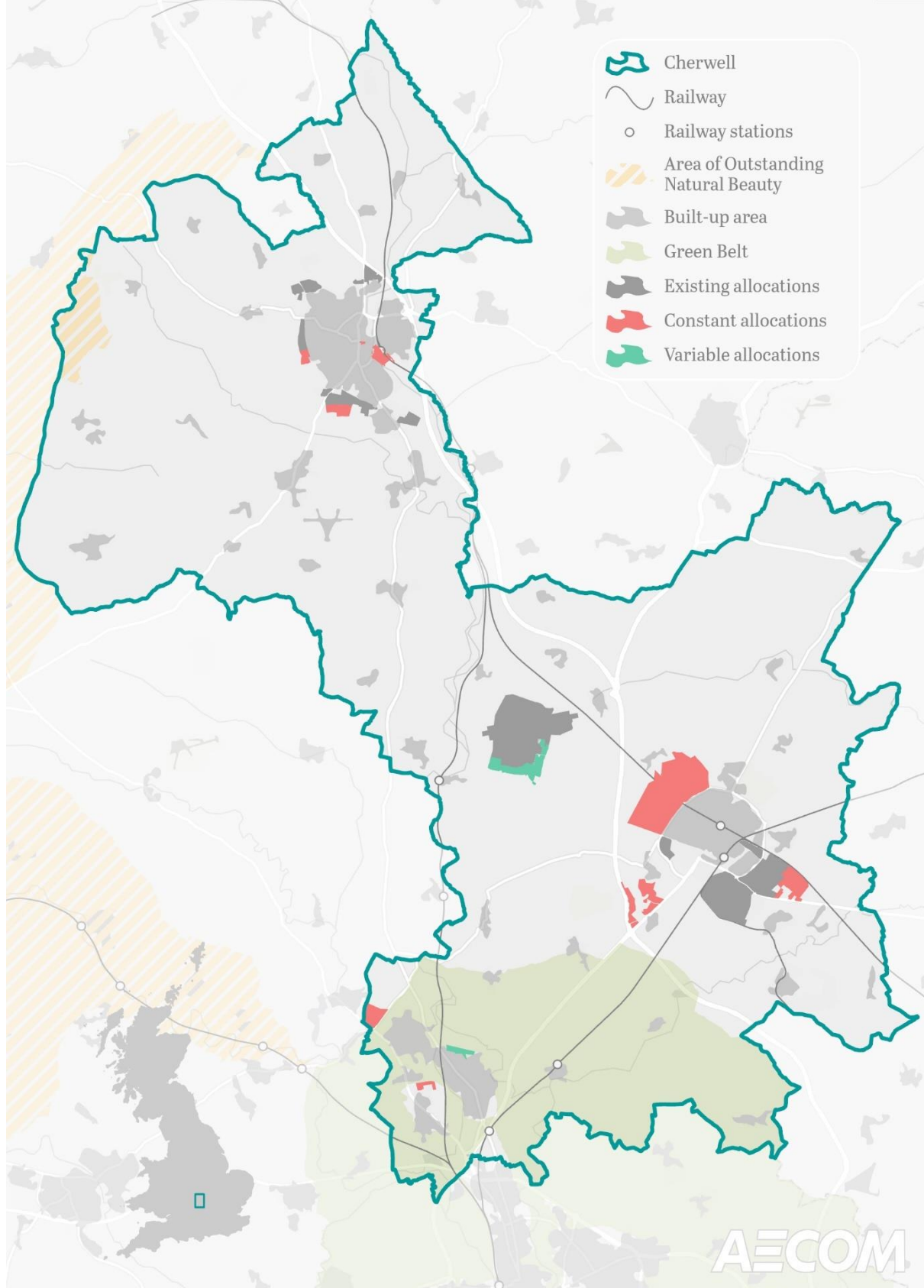
Constants + Kidlington



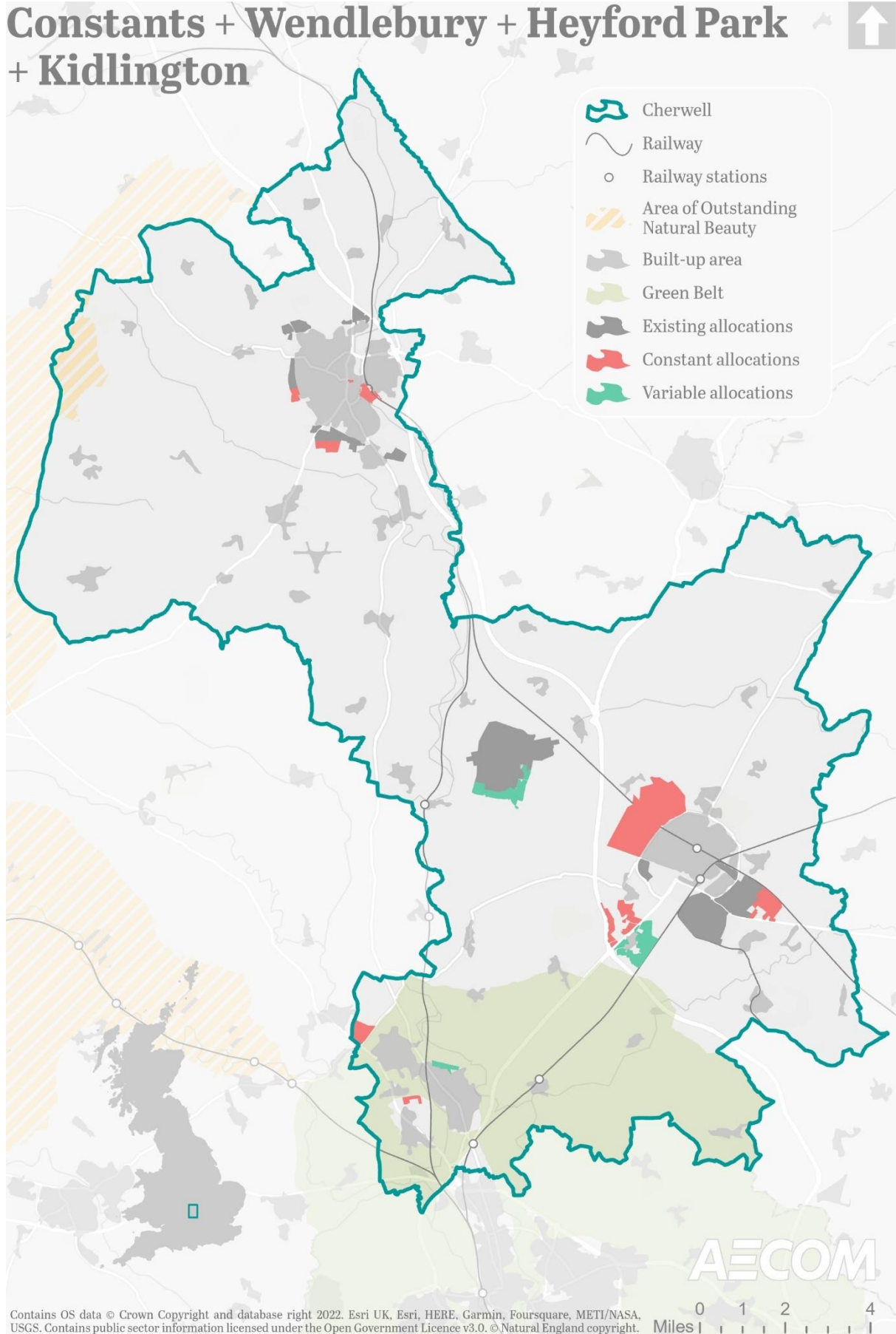
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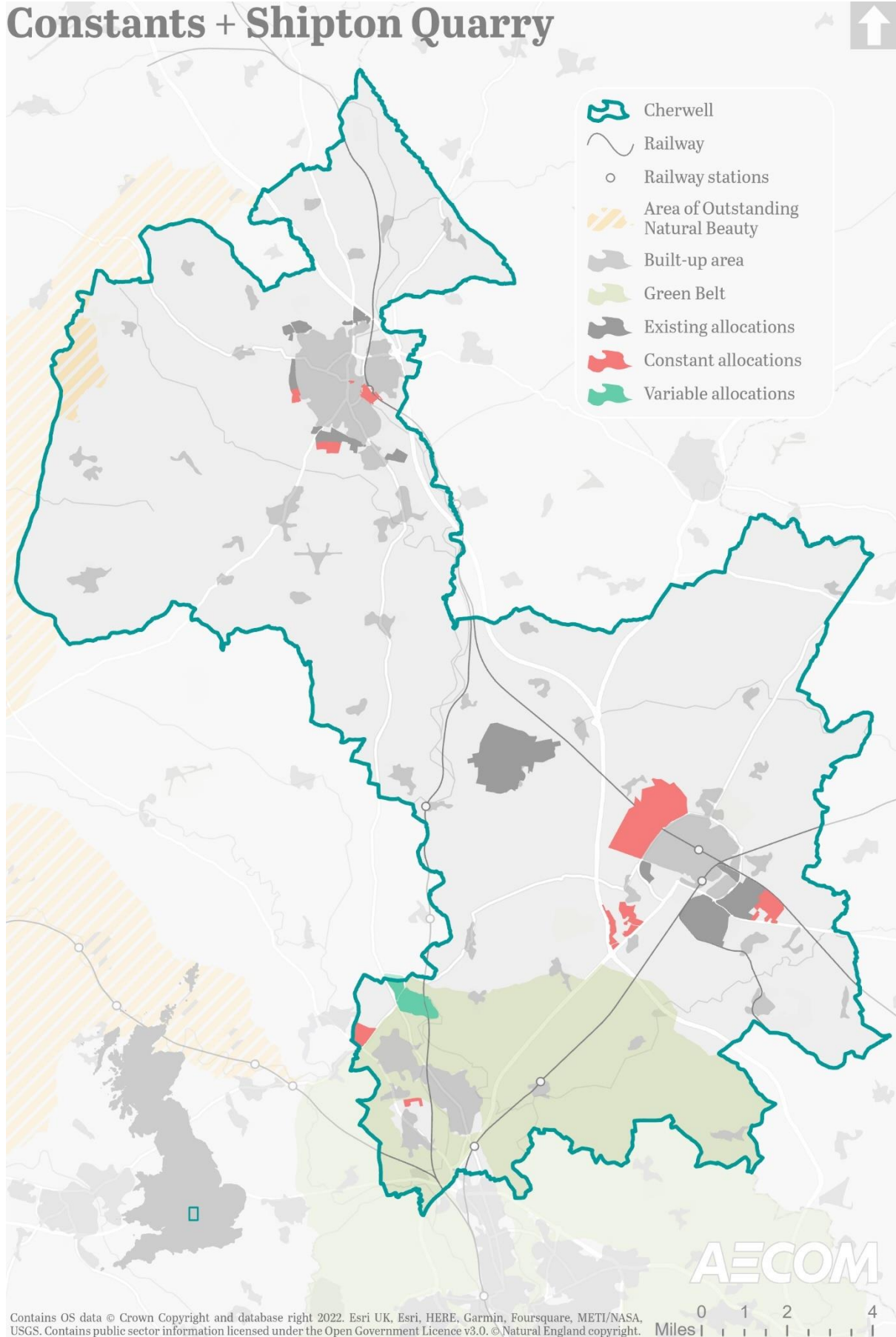
Constants + Heyford Park + Kidlington



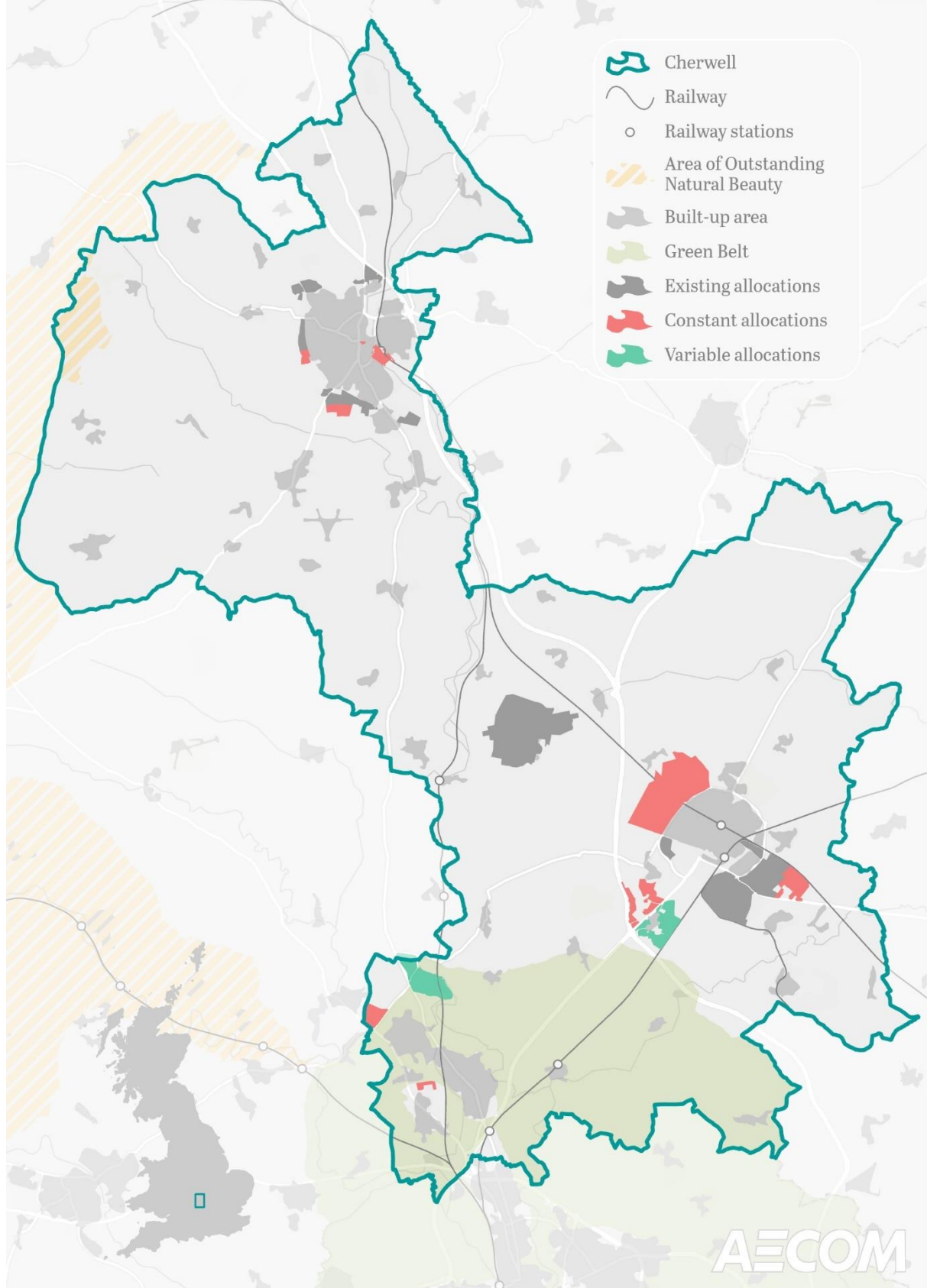
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Constants + Shipton Quarry

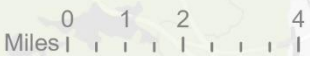


Constants + Wendlebury + Shipton Quarry

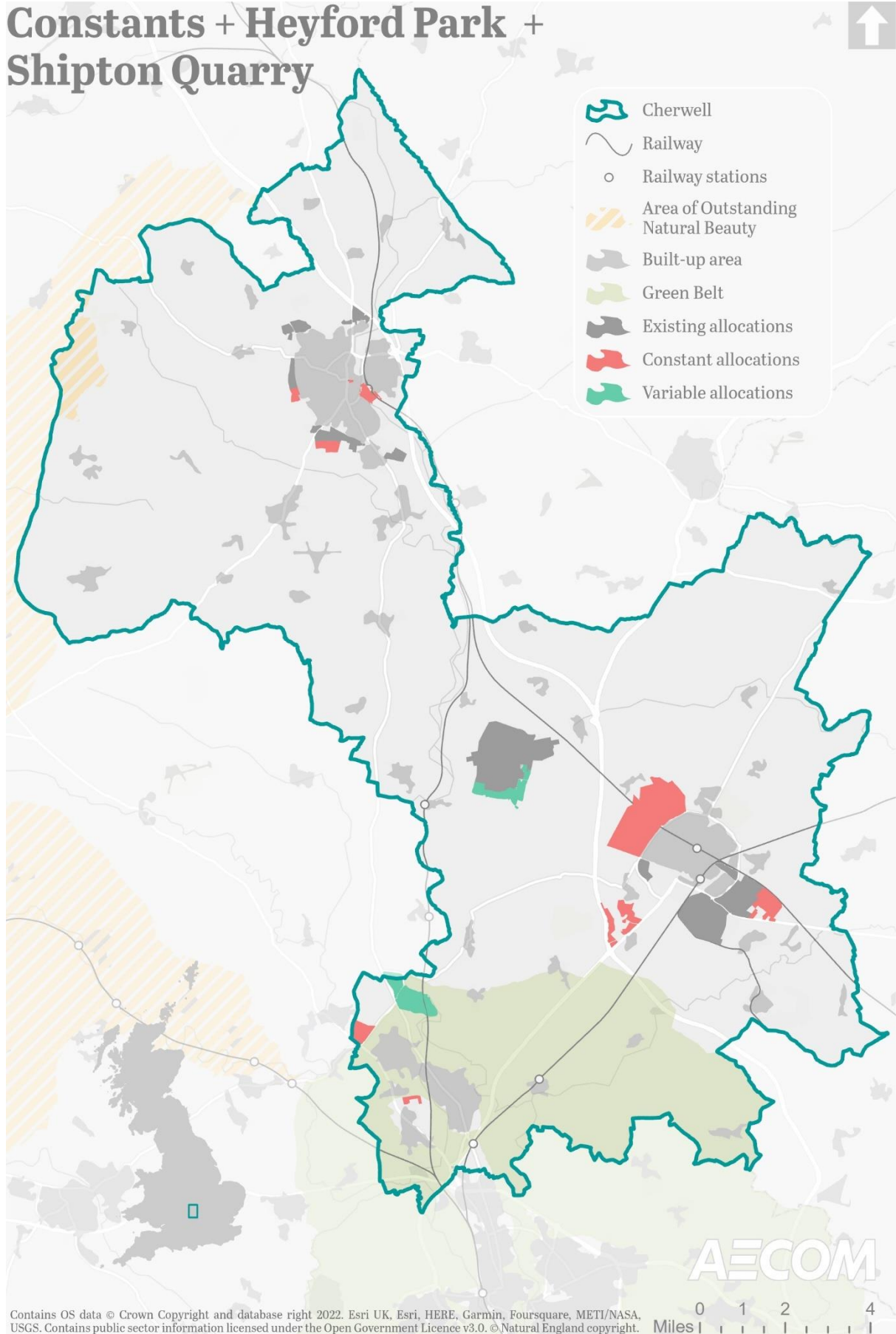


-  Cherwell
-  Railway
-  Railway stations
-  Area of Outstanding Natural Beauty
-  Built-up area
-  Green Belt
-  Existing allocations
-  Constant allocations
-  Variable allocations

AECOM

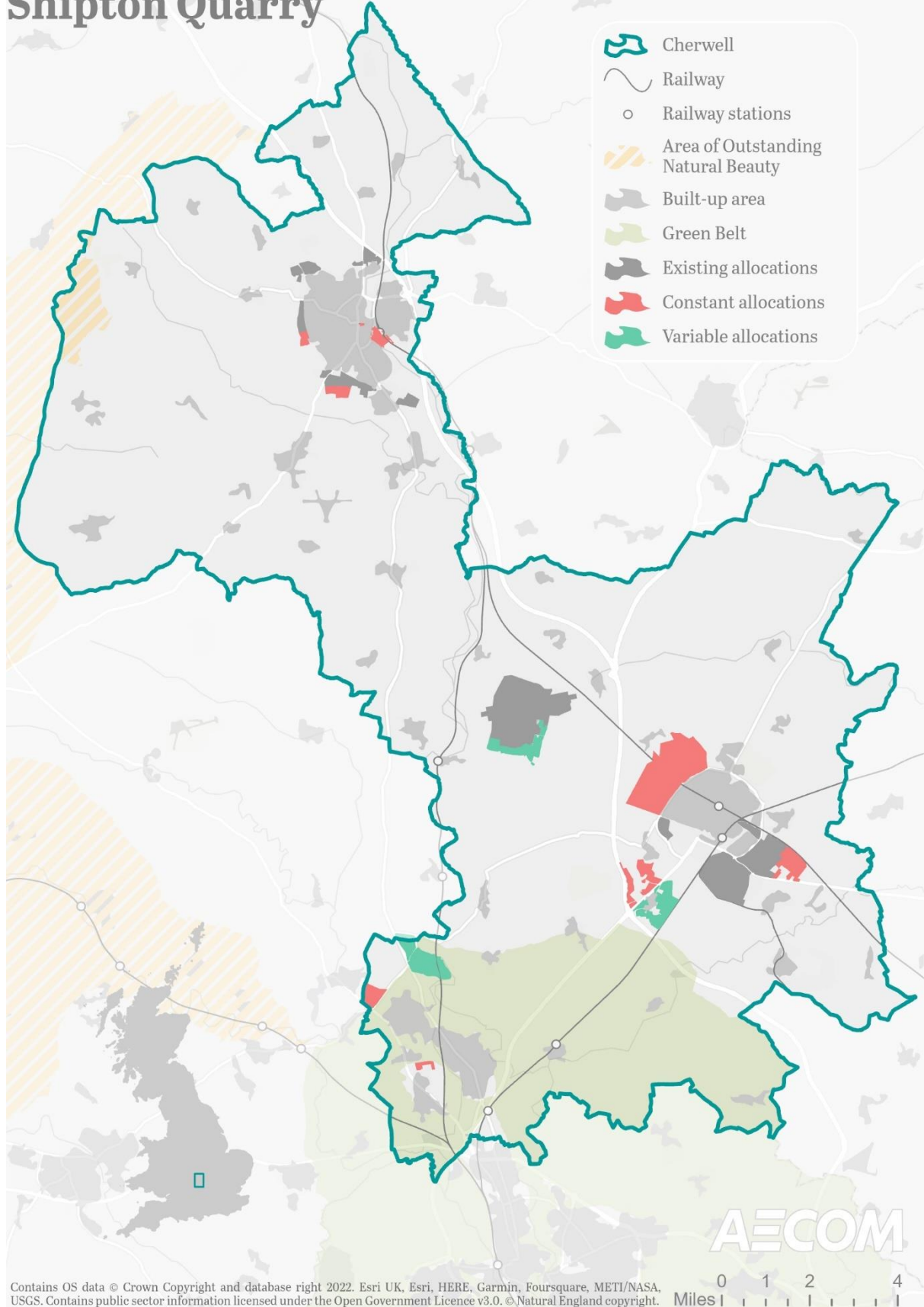
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Constants + Heyford Park + Shipton Quarry



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Constants + Wendlebury + Heyford Park + Shipton Quarry



6 Growth scenarios appraisal

6.1 Introduction

- 6.1.1 The aim of this section is to present an appraisal of the reasonable growth scenarios introduced above and further introduced in Table 6.1. To reiterate (see Section 4), these are the “reasonable alternatives”.
- 6.1.2 In summary, the scenarios vary in terms of four site allocations, which are considered to be those that are most marginal, on the basis of the process set out in Section 5. For each site there is a need to test both the option of allocation and non-allocation, and explore in-combination issues with the other three sites (with one exception; specifically, the scenarios reflect an assumption that higher growth at Kidlington would not be supported in combination with allocation of a new settlement at Shipton Quarry).

Table 6.1: The reasonable growth scenarios – summary

Scenario	Completions, commitments, windfall, constant allocations plus allocation of...	Total homes (2020-2040)	Homes per annum	Employment
1	-	28,024	1,401	As discussed in Box 5.2, the approach to employment land supply is held constant across the scenarios.
2	Wendlebury,	29,024	1,451	
3	Heyford Park	29,259	1,463	
4	Wendlebury, Heyford Park	30,259	1,513	
5	Kidlington	28,324	1,416	
6	Wendlebury, Kidlington	29,324	1,466	
7	Heyford Park, Kidlington	29,559	1,478	
8	Wendlebury, Heyford Park, Kidlington	30,559	1,528	
9	Shipton Quarry	30,024	1,501	
10	Wendlebury, Shipton Quarry	31,024	1,551	
11	Heyford Park, Shipton Quarry	31,259	1,563	
12	Wendlebury, Heyford Park, Shipton Quarry	32,259	1,613	

6.2 Appraisal methodology

6.2.1 The appraisal is presented under 12 headings – one for each of the topics that together comprise the SA framework – before a final section presents conclusions, including a summary appraisal matrix. Under each heading, the aim is to:

- 1) rank the scenarios in order of performance (with a star indicating best performing); and then
- 2) categorise the performance in terms of ‘significant effects’ using **red** / **amber** / **light green** / **green**.¹⁹

6.2.2 Further points to note on methodology are as follows:

- Variable sites – are a primary focus of the appraisal here, although ‘constant’ site are taken into account when reaching conclusions on significant effects. Constant sites are a focus of appraisal in Section 9.
- Assumptions – there is a need to make a range of assumptions, e.g. around the nature of schemes that would come forward, infrastructure delivery etc. The appraisal aims to strike a balance between exploring and explaining assumptions on the one hand whilst, on the other hand, ensuring conciseness.
- Site specific materials – typically submitted by site promoters, are taken into account with due caution, given a risk of bias and mindful that site-specific proposals are subject to change.

¹⁹ **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. No colour indicates a neutral effect.

Air and wider environmental quality

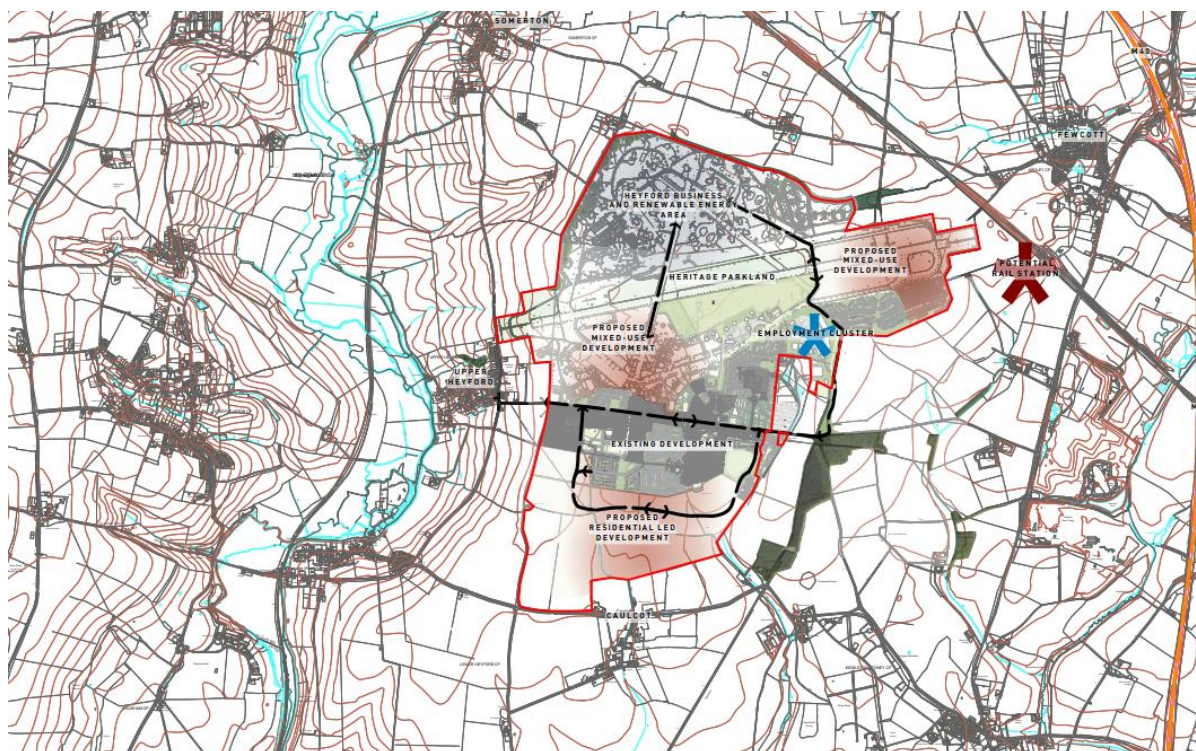
1. Constants only	2. Wendlebury	3. Heyford Park	4. Wendlebury, Heyford Park	5. Kidlington	6. Wendlebury, Kidlington	7. Heyford Park, Kidlington	8. Wendlebury, Heyford Park, Kidlington	9. Shipton Quarry	10. Wendlebury, Shipton Quarry	11. Heyford Park, Shipton Quarry	12. Wendlebury, Heyford Park, Shipton Quarry
2	★1	★1	★1	★1	★1	★1	★1	★1	★1	★1	★1

- 6.2.3 **Banbury** is an air quality hotspot in the district, with a particularly problematic Air Quality Management Area (AQMA) along the A422 Hennef Way, which sees heavy traffic, as the main road linking to the M40 (albeit few if any sensitive receptors intersect the AQMA). However, the approach to growth at Banbury is held constraint across the reasonable growth scenarios. Banbury is discussed further in Section 9.
- 6.2.4 There is also an AQMA constraining the centre of **Bicester**, intersecting a number of properties and an important walking / cycling route, including in the vicinity of Bicester Community Hospital. Bicester is one of the three 'variables' across the growth scenarios, and so there is a need to carefully consider the air quality implications of higher growth (Scenarios 2, 4, 6, 8, 10 and 12).
- 6.2.5 The assumed location for higher growth (Wendlebury), would lead to traffic through the AQMA, e.g. car journeys towards Milton Keynes. However, there is a need to factor-in good rail connectivity (including to Milton Keynes, following EWR), excellent access to the M40, the potential for good cycle connectivity and also the timing of development relative to the anticipated national switch-over to EVs.
- 6.2.6 Also, and importantly, higher growth at Bicester could facilitate delivery of a southern link road, which could (subject to further investigation) do much to address current issues of traffic congestion and air quality. The Wendlebury site in question might help to deliver the western sector of this road; however, it is important to be clear that any strategic growth locations at Bicester would likely be required to contribute to required strategic road infrastructure. If the road can be delivered then there would be good potential to reduce traffic along the A41 to the west of Bicester, potentially enabling the road corridor to be reimagined as a public transport and walking / cycling corridor, acting as a 'gateway' to Bicester Garden Town and linking growth locations / Bicester P&R (which could develop into a 'transport hub') to Bicester Village and the town centre. Further discussion of the Wendlebury growth option is presented below.
- 6.2.7 With regards to Bicester, a further consideration is the risk of further growth at **Heyford Park**, leading to increased Bicester-bound traffic (and noting that the Bicester P&R is slightly out of the way for those travelling from Heyford Park). Also, and importantly, further growth at Heyford Park would lead to increased traffic through a number of rural villages, for example Middleton Stoney. This may not lead to concerns in respect of air quality, but does give rise to related concerns in respect of wider environmental quality / health and road safety. However, the intention is that further housing growth would deliver transport improvements, including an improved bus service and a new commuter cycle link to Bicester.
- 6.2.8 Also, whilst it is not clear that the additional housing growth under consideration here (1,235 homes on mainly greenfield land to the south of Heyford Park) would *directly* lead to increased trip internalisation, it could do so *indirectly*, over time, if the effect is to support investment in sensitive, heritage-led development (including repurposed historic buildings) of the former airfield, which is a conservation area. The site promoters responded to the Options consultation (2020), stating: "*Heyford Park has the potential for higher levels of containment given the provision of employment and residential development and opportunities to secure 20 minute neighbourhoods... [our] concept plan illustrates that approximately 5,000 dwellings and 5,500 jobs (approximately 110,000sqm) can be accommodated at Heyford Park to meet Oxfordshire 2050 needs.*" Their latest proposal (Sept 2020) is for a total of 5,500 homes and 5,500 jobs in the long-term (potentially by 2050), i.e. a settlement with a homes to jobs ratio of 1:1. On this basis – and in light of the concept plan presented below (Figure 6.1) - there is *potentially* a long term vision for Heyford Park as a service village with a good degree of containment / trip internalisation and, related to this, a strong identity / sense of place (as opposed to a car-dependent dormitory settlement). However, given the sensitivities, there is no certainty regarding achievability of the promoter's long term vision.

6.2.9 The site promoter's 2050 concept plan is presented as Figure 6.1. It is important to note the following:

- The current 'proposed residential led development' to the south of the 'existing development' (specifically 1,235 homes by 2040) does not extend as far south as indicated in the figure below, and extends further to the east (as far as the linear area of woodland known as the Heath).
- The intention is for the 1,235 homes residential led development to deliver a new road link, along the lines of what is shown in the figure below, which should help to improve bus services / connectivity.
- The current proposal is for the LPR to safeguard land at Ardley for a new / reopened train station.

Figure 6.1: Concept plan for Heyford Park 2050, as submitted by the site promoter in 2021



6.2.10 The other two sites that are a variable across the reasonable growth scenarios - **Kidlington** (North of the Moors) and **Shipton Quarry** - are associated with a range of transport-related issues and opportunities, but it is difficult to relate these to air quality objectives, with any confidence. Kidlington is in proximity to Oxford City, where there is an area-wide AQMA; however, it is not clear that proximity serves to indicate constraint over-and-above the other sites in question, recognising that Oxford is a sub-regional hub.

6.2.11 Finally, related to air quality, are matters relating to **environmental quality / health**. As well as the matter of Heyford Park generating traffic through rural villages, which is discussed above, another concern potentially relates to Wendlebury. Specifically, noise pollution could be an issue, given the location of the site between the M40, the A41 and EWR, plus the site might be bisected by a link road (as discussed). However, the majority of the land directly adjacent to the M40 falls outside of the site red line boundary, as it is currently in use as a solar farm, and land adjacent to the railway is constrained by flood risk. Land closest to the M40/A41 junction might be well suited to employment, but this would be subject to viability.

6.2.12 In **conclusion**, it is a challenge to differentiate between the scenarios with any confidence. On the one hand, there are a range of site-specific issues and concerns, perhaps most notably in respect of Heyford Park. However, on the other hand, development at all of the sites in question could potentially serve to support the achievement of strategic transport objectives (including Heyford Park, where there is an opportunity to support significant improvements to transport connectivity in the longer term).

6.2.13 Having said this, Shipton Quarry is a location for growth that would represent a major departure from existing strategy, and is not being factored in to ongoing work being led by the County Council, including the [Central Oxfordshire Travel Plan](#). Also, there is potentially a concern with the transport implications of growth at both Shipton Quarry and Heyford Park, given shared road corridors.

6.2.14 Matters are discussed further below, under 'Transport'.

- 6.2.15 On balance, it is only possible to confidently flag a concern with the lowest growth scenario, which would risk pressure for growth elsewhere, within a constrained sub-region, at locations where growth would not align well with transport objectives, and associated air quality objectives (also mindful that growth could come forward in the relatively short term, whilst the EV switchover remains ongoing).
- 6.2.16 With regards to significant effects, there is a need to account for those site allocations that are a constant across the reasonable growth scenarios, as well as the proposal to support 500 homes across non-strategic sites, at locations to be identified subsequent to the current consultation. There is also a need to account for an improving baseline situation, due to the national switch-over to EVs. On balance, broadly **neutral effects** are predicted, even for Scenario 1, but with some uncertainty.

Biodiversity

1. Constants only	2. Wendlebury	3. Heyford Park	4. Wendlebury, Heyford Park	5. Kidlington	6. Wendlebury, Kidlington	7. Heyford Park, Kidlington	8. Wendlebury, Heyford Park, Kidlington	9. Shipton Quarry	10. Wendlebury, Shipton Quarry	11. Heyford Park, Shipton Quarry	12. Wendlebury, Heyford Park, Shipton Quarry
2	1	1	1	1	1	1	1	3	3	3	3

- 6.2.17 Of the four sites that are a variable across the reasonable growth scenarios, it is **Shipton Quarry** that is subject to greatest biodiversity constraint, recognising that the entire central part of the site – specifically that part of the site that comprises the former quarry – is designated as a local wildlife site (LWS).
- 6.2.18 On the one hand, the habitats present presumably largely result from recent quarrying activities, as opposed to comprising semi-natural habitats that have developed as a result of many decades or centuries (potentially many centuries) of land use. This could serve to indicate relatively good potential to deliver extensive built form within the LWS – along with high quality green and blue infrastructure – without leading to major conflicts with strategic biodiversity objectives (given an assumption of carefully targeted compensatory habitat enhancement and creation, such that an overall biodiversity net gain is achieved in line with the legislator requirement under the Environment Act). However, on the other hand, the position of the LWS within the landscape could serve to indicate particular value and sensitivity. Specifically, there is a need to be mindful of the close association of the LWS with the River Cherwell corridor, and it is due to this close association that the LWS is identified as falling within a Conservation Target Area.
- 6.2.19 The site promoters point to the potential for development to deliver targeted biodiversity enhancements. However, there have been major changes to specific proposals over recent years, which serves to highlight the extent of the challenge. Specifically, whilst in 2020 the proposal was to retain the main area of existing ponds as a “primary nature conservation 'bowl'”, by 2021 the proposal had evolved significantly, with an ‘ecology park’ proposed for land to the east of the railway line and adjacent to the River Cherwell (where the land is currently under arable cultivation, and subject to flood risk). There is clear merit to the idea of a biodiversity-focused country park to the east of the railway line, given the association of the land here with the Oxford Canal and a large meander of the River Cherwell. However, at this stage, it is far from clear that a suitably high net biodiversity gain could be achieved – as measured at a suitable landscape scale (e.g. at the scale of the River Cherwell corridor) – given the LWS constraint, and despite the proposal to deliver a well-targeted, biodiversity-focused new country park.
- 6.2.20 The concept masterplans received from the site promoter in 2020 and then in 2021 are presented below, as Figure 6.2 and 6.3. In 2020 the proposal was for 1,500 – 2,000 homes, with the potential for a second phase involving land to the northwest (~2,000 homes). The latest proposal, on the basis of the information submitted in 2021, is for 2,500 homes (at 40 dwellings per hectare, dph) with the potential for a second phase involving 2,500 homes across land to the west. Also shown below, as Figure 6.4, is a Google Earth image from 2006, showing extensive vegetation across the site (more than shown by the latest imagery).

Figure 6.4: Satellite imagery from 2006 (Google Earth)



- 6.2.22 The next ‘variable’ site for consideration is **Wendlebury** which – it is assumed – would come into consideration as an allocation in order to deliver a higher growth strategy at Bicester. The site promoters suggest a 2,850 home scheme, involving significant development to the east of the railway line to Oxford (see Figure 6.5); however, the assumption here is that development would *not* extend beyond the railway line, primarily on account of flood risk and biodiversity constraints to the east. Specifically, nearly all land to the east of the railway line falls within a fluvial flood risk zone, and much of the land is identified as floodplain grazing marsh priority habitat by the nationally available (albeit there is no designated LWS, and satellite imagery shows some recent arable cultivation). The site promoters propose to address flood risk by “land raising and lowering”; however, there is a clear need to avoid flood risk in the first instance, as far as possible, in line with the sequential approach (discussed further below). With regards to land lowering, it is recognised that this could support targeted wetland habitat creation, and also that the site promoters suggest the potential to achieve a 20% biodiversity net gain overall. However, there is no certainty regarding the potential for this strategy to prove successful, from a biodiversity perspective, and there is a need for caution given that land here is sensitive on account of its association with the Upper Ray Meadows [Living Landscape](#), and noting that Wendlebury Meads and Mansmoor Closes SSSI is less than ~2km downstream. The land in question (i.e. the priority habitat east of the railway line) does not fall within a Conservation Target Area, but it is identified by the Cherwell Green and Blue Infrastructure Strategy (2022) as falling within the [Core Zone](#) of the Oxfordshire Nature Recovery Network.
- 6.2.23 With regards to the assumed option of a ~1,000 home scheme to the west of the railway line (avoiding built development within the flood risk zone), this is thought to give rise to relatively limited concerns, from a biodiversity perspective, although there would still be a need to carefully consider hydrological linkages to the SSSI downstream. It is important to be clear that the entire Wendlebury Area falls within the extent of the Upper Ray Meadows and Bernwood Forest Living Landscape, within which the Wildlife Trust focuses its conservation efforts. The Living Landscape is discussed within the Green and Blue Infrastructure Strategy (2022), under the Otmoor, Bernwood and Ray [heading](#).
- 6.2.24 The other two sites in question are considered to be fairly unconstrained, from a biodiversity perspective.
- 6.2.25 With regards to **Heyford Park**, the eastern extent of a southern extension (1,235 homes) would envelop a tree belt and abut a woodland, and both features link to the woodlands of Middleton Park (in turn, the main woodland falls within a conservation target area). These features appear on the pre-1914 OS map, but there is limited priority habitat (according to the national dataset), and there might be some potential for expansion of the woodland (it is associated with a historic bridleway) and/or improved management.

Figure 6.5: Concept plan for Wendlebury (N.B. larger than assumed here), as submitted by the site promoter



6.2.26 With regards to **Kidlington** (North of the Moors), the firm assumption is that a long term defensible Green Belt gap would be retained to the River Cherwell corridor, to the north, although development would impact on a series of hedgerows that intersect the site, which are shown on the pre-1914 OS map (N.B. the hedgerow at the northern extent of the site has been recently planted). It is also noted that Rushy Meadows SSSI is located less than 1km distant, to the southwest; however, there is much intervening built form, and generally in the vicinity of the SSSI, and significant hydrological connectivity seems unlikely. The possibility of access arrangements impacting on an area of trees with TPOs is another consideration.

N.B. Kidlington is also in relative proximity to the internationally important Oxford Meadows Special Area of Conservation (SAC). However, the distance involved (~4km) serves to limit concerns around potential impact pathways. Matters are explored through a stand-alone Habitats Regulations Assessment (HRA).

6.2.27 In **conclusion**, it is fair to flag a concern with Shipton Quarry, at this early stage, ahead of further detailed work and consultation with key stakeholder organisations, including Natural England, the Wildlife Trust and the Canal and Rivers Trust. The site is closely associated with the River Cherwell corridor – which is a conservation priority area – which serves to indicate a degree of sensitivity, albeit also potentially opportunity. There is also a potential concern regarding Wendlebury, on account of the close association of land here with the Upper Ray Meadows broad landscape, which is another conservation priority area of sub-regional and potentially wider importance (in combination with the Bernwood Forest, to the south); however, concerns are considered quite limited, on the assumption of a scheme that is far more modest in scale than that currently proposed by the site promoter.

6.2.28 With regards to growth quantum, on balance it is considered appropriate to flag a concern with the lowest growth scenario, which could lead to increased pressure for growth elsewhere within a constrained sub-region. With regards to the highest growth scenarios - Scenarios 11 and 12 - it could feasibly be the case that growth at both Heyford Park and Shipton Quarry is supportive of an ambition to deliver strategic enhancements along the River Cherwell / Oxford Canal corridor (in terms of wide-ranging natural capital and ecosystem service objectives), but this is highly uncertain at this stage in the plan-making process.

6.2.29 With regards to **significant effects**, there are concerns with one of the sites that is held constant across the growth scenarios, namely SE Bicester (800 homes; see further discussion in Section 9). This being the case, **uncertain or moderate negative effects** are predicted for the worst performing scenarios.

Climate change adaptation

1. Constants only	2. Wendlebury	3. Heyford Park	4. Wendlebury, Heyford Park	5. Kidlington	6. Wendlebury, Kidlington	7. Heyford Park, Kidlington	8. Wendlebury, Heyford Park, Kidlington	9. Shipton Quarry	10. Wendlebury, Shipton Quarry	11. Heyford Park, Shipton Quarry	12. Wendlebury, Heyford Park, Shipton Quarry
★ 1	2	★ 1	2	★ 1	2	★ 1	2	★ 1	2	★ 1	2

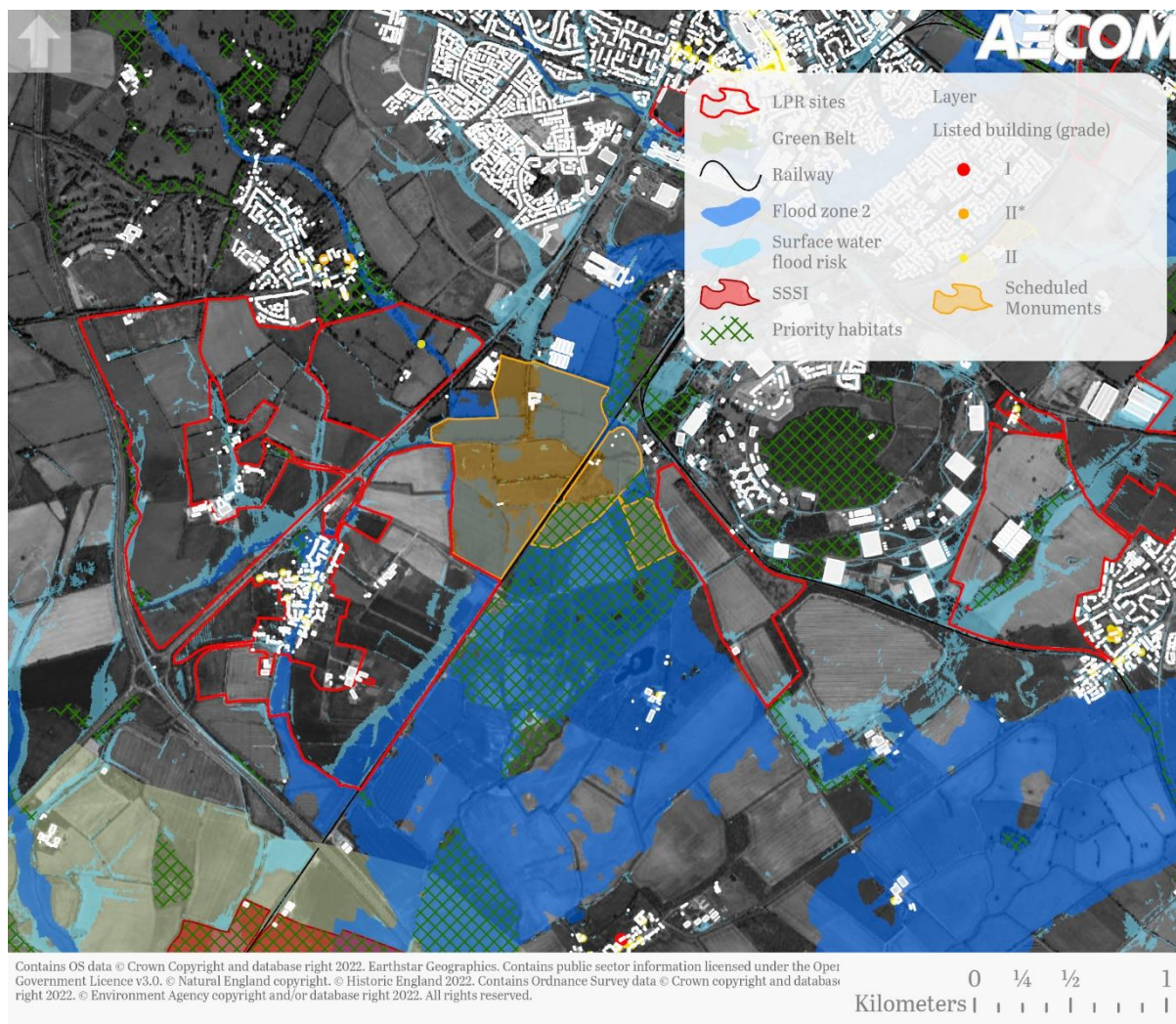
6.2.30 The key consideration here is the need to avoid development - in particular new homes - encroaching on fluvial flood risk zones, noting the possibility of expanded flood risk zones under climate change scenarios. A secondary consideration is surface water flood risk, noting that it is often possible to deal effectively with surface water flood risk through masterplanning and sustainable drainage systems (SuDS). Another consideration is development impacting on water flows and, in turn, down-hill / down-stream flood risk;. However, it is difficult to pinpoint issues / opportunities ahead of detailed work, and it is typically the case that SuDS can be implemented to ensure no net worsening of run-off rates, and often a betterment.

6.2.31 Taking the four variable site options in order of flood risk constraint, beginning with the least constrained:

- **Heyford Park** – is associated with raised land between river valleys (the Cherwell and the Ray), and accordingly there are no fluvial flood risk zones intersecting the current site in question (a southern extension for 1,235 homes by 2040) or the wider Heyford Park site (which could come into consideration for additional growth, e.g. by 2050). However, there are two surface water flood channels passing through the site, which could feasibly be associated with a degree of fluvial flood risk upon closer investigation. Both of these follow field boundaries, which serves to suggest good potential to avoid new homes intersecting the flood zone, with the eastern-most of the two following a notable tree belt (discussed above under ‘Biodiversity’). Furthermore, this eastern flood channel is associated with a wastewater treatment works (WwTW), which is discussed further below.
- **Kidlington** (North of the Moors) – is closely associated with the River Cherwell corridor, but the firm proposal is to retain a Green Belt buffer between the site and the fluvial flood risk zone. The fluvial flood zone intersects the eastern extent of the site; however, there is a strong argument for delivering green / blue infrastructure within this part of the site in any case, to address historic environment constraint.
- **Shipton Quarry** – the nationally available datasets showing fluvial and surface water flood risk serve to indicate limited constraint. However, there is a clear need to sense check and confirm the situation, ahead of any further detailed work to explore the possibility of a new settlement, given the inherent characteristics of the site, namely significantly lowered land (i.e. a quarry) adjacent to the River Cherwell. The main promotional document received from the site promoters includes a section on flood risk, but this presents limited detail, for example stating: *“There is also a medium to high risk of flooding from River Cherwell, thus a detailed flood risk assessment must be completed and will be submitted with any planning application for the scheme.”* It is recognised that developments within former quarry sites are not uncommon, but there is a need to ensure a proactive, and plan-led approach to flood risk.
- **Wendlebury** (Bicester) – is heavily constrained by flood risk, given the close association of land to the southwest of Bicester with the extensive floodplains of the Upper Ray Meadows, which is a recognised landscape area, of at least sub-regional significance, as discussed above under ‘Biodiversity’. The assumption here, for the purposes of exploring reasonable growth scenarios (through appraisal and consultation) is that built form (particularly residential) would avoid fluvial flood risk zones, in line with the nationally required sequential approach to avoiding flood risk, hence the assumption is a ~1,000 home scheme as opposed to the 2,800 homes scheme proposed by the site promoters. However, even a ~1,000 home scheme would likely be constrained on account of flood risk (subject to further investigation), noting: A) land to the east of Wendlebury is bounded on all sides by fluvial flood risk zones, such that there is a need to consider the potential for safe access and egress during a major flooding event, albeit it is recognised that the flood zone to the north is very narrow; and B) the surface water flood zone extends notably beyond the fluvial flood zone in the vicinity of the railway line. There are three further points to make, regarding links between flood risk and development options in this area:

- Wendlebury itself is significantly affected by a fluvial flood risk channel, with numerous homes intersecting the flood risk zone. The site promoters propose to proactively address this, by delivering a ‘flood bypass’ of the existing village, which is potentially a significant opportunity for ‘planning gain’. However, this proposal is made in the context of a proposed 2,800 home scheme (to include extensive development within the existing fluvial flood risk zone), hence it will be for the site promoters to confirm that the flood bypass could be delivered as part of a more modest scheme, e.g. ~1,000 homes.
- With regards to existing flood risk affecting Wendlebury, there is also a need to consider planned and potential upstream development, within sites LPR37 and LPR38, as discussed above, in Section 5. In short, there is significant committed growth, and the potential for significant further growth over-and-above that which is committed, including 500 homes to the south of Chesterton, which is the firm assumption here (i.e. 500 homes south of Chesterton is a ‘constant’ across the growth scenarios). All of the land here drains to Wendlebury, specifically two recognised streams and two further surface water flood channels (i.e. all four channels converge at Wendlebury), hence there is a need for caution, albeit there could also be the potential for development within LPR37 and LPR38 to deliver a betterment, in terms downstream flood risk affecting Wendlebury. Indeed, this is understood to be a matter that has been a focus of the planning application process for the recently permitted strategic employment scheme within LPR38 (ref. [22/01144/F](#)), which will involve rerouting a stream corridor.
- In general, the flood risk ‘picture’ is quite complicated in the vicinity of the A41 corridor southwest of Bicester, and Bicester as a whole, because this is low lying land associated with a high density of tributaries of the River Ray (including several that converge at Wendlebury). The situation is not helped by the fact that only one tributary is named on the OS map, namely the Gagle Brook. This is potentially a barrier to strategic planning for growth alongside flood risk management / climate change resilience. Figure 6.6 aims to present an overview of the flood risk picture affecting Bicester.

Figure 6.6: A map to inform strategic planning for growth alongside flood risk management at SW Bicester



- 6.2.32 In **conclusion**, there is a clear need to flag a concern with the option of growth at Wendlebury, albeit through further detailed work it may be possible to identify the potential for strategic growth in this area that does not give rise to a concern, from a flood risk perspective, and there may be the potential to address existing flood risk affecting Wendlebury, leading to a significant betterment / planning gain. There are also question-marks regarding flood risk at Shipton Quarry, which would require further investigation. A further consideration is the possibility of growth at both Heyford Park and Shipton Quarry (Scenarios 11 and 12) enabling or facilitating investment in strategic flood water attenuation / natural flood risk management along the River Cherwell corridor, to the benefit of locations downstream at risk, within Kidlington and Oxford; however, it is not possible to suggest an opportunity with any certainty at this stage.
- 6.2.33 With regards to **significant effects**, it is considered to predict moderate or uncertain negative effects for all scenarios, mindful of the package of sites that is a constant across all of the growth scenarios. See further discussion in Section 9.

Climate change mitigation

1. Constants only	2. Wendlebury	3. Heyford Park	4. Wendlebury, Heyford Park	5. Kidlington	6. Wendlebury, Kidlington	7. Heyford Park, Kidlington	8. Wendlebury, Heyford Park, Kidlington	9. Shipton Quarry	10. Wendlebury, Shipton Quarry	11. Heyford Park, Shipton Quarry	12. Wendlebury, Heyford Park, Shipton Quarry
2	★1	★1	★1	2	★1	★1	★1	★1	★1	★1	★1

- 6.2.34 The scope of discussion here focuses on per capita greenhouse gas emissions from the **built environment**, mindful that alignment of the reasonable growth scenarios with strategic transport objectives is a focus of discussion under other topic headings.
- 6.2.35 A detailed discussion of the potential for the LPR to support strategic objectives around minimising per capita built environment greenhouse gas emissions and, in turn, support rates of decarbonisation in line with district, county and national net zero carbon targets, is presented in Section 9.
- 6.2.36 The focus of discussion here is in respect of the potential for each of the reasonable growth scenarios to support a focus of growth at strategic-scale schemes, and to support higher density mixed use communities, with a view to minimising per capita built environment emissions.
- 6.2.37 In this respect, **Shipton Quarry** *potentially* performs well, as a location for growth, relative to the other three site options that are a variable across the growth scenarios. This is on account of the scale of the proposed scheme (the site promoters suggest 2,500, with the potential for a further phase of 2,500, but the assumption here is simply ~2,000 homes). There is also *some* potential for a nucleated built form, specifically within the eastern part of the site (see Figure 6.3), where the new community would be somewhat centred on a local centre and train station, where there might be potential for higher densities (and land levels may support this). Also, it is noted that an employment area is proposed near adjacent to the eastern residential area, which could lead to an opportunity to balance demand for heat and power across the day. Finally, it is worth noting that the potential for hydropower could feasibly be explored.
- 6.2.38 However, the latest proposal is for a scheme that is less nucleated than that previously proposed in 2020 (Figure 6.2), plus the built form could become less-nucleated-still, were the proposed second phase to eventually come forward, to the west of the A4260. Also, there is a need to consider the possibility of abnormal development costs impacting on the availability of funds to direct towards planning for renewable energy infrastructure (see Section 9) or achievement of the highest standards of building design.
- 6.2.39 It is also helpful and appropriate to review materials received from the site promoter, including with a view to building an understanding of their commitment to directing limited funds to built environment decarbonisation focused measures (i.e. in a way that maintains overall development viability); however, (as discussed above) site specific proposals are naturally subject to change, including in response to local plan policy. The intention is for the Cherwell LPR to set stringent policy on built environment decarbonisation, as discussed further below, in Section 9.

- 6.2.40 With regards to the latest promotional document received from the site promoters, it is notable for dedicating four of the first five sections to a high level discussion of climate change policy, but then subsequently providing very little detail regarding the merits of the site (most importantly) or the specific proposed scheme (which is subject to change), from a built environment decarbonisation perspective. In particular, there is very little information provided to evidence a conclusion that supporting growth at Shipton Quarry would lead to an opportunity over-and-above other competing strategic growth locations (N.B. it is recognised that the site is associated with a key strategic transport opportunity, namely a new train station). Rather, the document primarily presents high level statements that could apply to any strategic site, for example: “A new energy centre is located centrally which will be used to help power activity within the new settlement.” It is recognised that built environment decarbonisation is a fast moving policy area, such that there is a need to ‘future proof’ proposals, but there is nonetheless a need to take a proactive strategic approach. Also, and on a specific note, the suggestion that the energy centre is ‘centrally’ located is questionable. The other main commitment is very high level: *“The intention is to create a truly sustainable eco-community with low carbon... buildings designed to a highly insulated ‘fabric first’ approach supplemented with renewable energy options and network energy systems... This would work in conjunction with the wider sustainable measures of sustainable travel, ecological enhancements, sustainable drainage, and potential carbon sequestration.”*
- 6.2.41 **Heyford Park** is the next largest scheme, with the current proposal involving a 1,235 homes. With regards to the characteristics of the site, the proposed configuration of growth is somewhat linear, and the existing community will (modestly) separate the new community from the local centre and employment land. With regards to the commitments set out under the “Sustainability and energy” heading within the briefing note received from the site promoters in September 2022, there is a focus on listing out headline commitments from the permitted 2018 planning application, with the explanation: *“This approach will be continued in any future development.”* This cannot be described as proactive, given the extent to which understanding built environment decarbonisation issues/opportunities has moved on since 2018; for example, combined heat and power (CHP, with generators typically housed in ‘energy centres’) is no longer seen as a low carbon technology, due to decarbonisation of the national grid. Also, the following statement is unclear: *“There are also opportunities to fully offset energy consumption with low carbon housing and large scale solar provision energy and other renewable technologies.”* However, it is important to reiterate that developer proposals are subject to change, and will ultimately need to demonstrate conformity with the emerging local plan policies, which are set to update significantly the requirements set out in the previous Cherwell Plans (see further discussion in Section 9).
- 6.2.42 The next site for consideration is **Wendlebury**, where the site promoters have proposed a 2,800 home scheme, but the current assumption is delivery of ~1,000 homes. The promotional material received through the Options consultation (2021) does include a clear commitment to net zero development, with a helpful distinction made between operational / in use emissions and non-operational emissions (e.g. embodied emissions in building materials). However, the terminology / commitments are not defined with any precision, which leaves them open to interpretation (see further discussion in Section 9), and leaves open the potential for confusion (and even ‘greenwash’). Beyond this, the promotional material does not present any built environment decarbonisation-related masterplanning proposals (e.g. ground solar linking to large scale battery storage (e.g. within ‘energy centres’), which is likely to be necessary to enable net zero developments, albeit there will likely also be a major role for smaller scale battery storage to balance power supply and demand, including EV batteries). However, there is a proposal to deliver a Modern Methods of Construction (MMC) facility at the site, with a view to delivering ‘offsite construction’ of homes (likely to include ‘modular’ construction) not only for Wendlebury, but also for other development sites in the sub-region. This is a considerable opportunity, as there is an urgent need nationally to support MMC.²⁰ However, it is unclear whether the facility would remain a viable option under a ~1,000 home scenario.
- 6.2.43 The final variable site option is **Kidlington** (North of the Moors), which is a smaller site (~300 homes). This is a site that is not likely to be associated with any abnormal development costs, so there is every potential to bring forward development in line with district-wide policy on built environment decarbonisation (see Section 9). However, the size of the site – also mindful of its somewhat linear shape, and a potential need for modest densities, at least in part, given constraints – could well mean that the built environment decarbonisation opportunity is lower than is the case for the sites discussed above.

²⁰ For example, a recent “net zero whole life carbon roadmap for the built environment” prepared by the UK Green Building Council’s (UKGBC) concludes the following under the banner of ‘non-operational’ emissions: *“Embodied carbon emissions make up approximately 50% of building lifecycle emissions, yet are currently unregulated, and measurement and mitigation within design and construction is entirely voluntary. Solving the issue is both a demand and supply issue...”*

- 6.2.44 In **conclusion**, the key consideration here is support for directing growth to large strategic sites, which tend to be associated with a built environment decarbonisation opportunity over-and-above smaller sites. There is an argument to suggest that Heyford Park may be associated with less opportunity than is the case for Shipton Quarry or Wendlebury, but this is not clear at this relatively early stage. Moving forward, it will be important for site promoters to present information - on the built environment decarbonisation opportunity - that enables differentiation between their site (most importantly) / proposed scheme (less importantly, as subject to change) and other competing strategic sites, as opposed to generic statements.
- 6.2.45 Focusing on the highest growth scenario (Scenario 12), there is no potential to suggest that higher growth is inherently problematic, despite the fact that higher growth would make meeting the *local* net zero ambition (net zero by 2030) more challenging, because climate change is a *global* issue, such that there is a need to focus on per capita emissions. There is an argument for supporting a focus of growth at three large strategic sites; however, this argument assumes that opportunities associated with strategic growth locations that can be discussed in theory would be realised in practice.
- 6.2.46 With regards to significant effects, on the one hand climate change is a global issue such that the significance of local actions is inherently limited. However, on the other hand, there are stringent targets and commitments in place, which will prove very challenging to achieve / honour, unless urgent action is taken, and decarbonisation features as a central pillar – indeed *the* central pillar – of the LPR. On balance, it is appropriate to predict **moderate or uncertain negative effects** under all scenarios at this stage. There will be the potential to improve this conclusion following further site specific work.

Communities

1. Constants only	2. Wendlebury	3. Heyford Park	4. Wendlebury, Heyford Park	5. Kidlington	6. Wendlebury, Kidlington	7. Heyford Park, Kidlington	8. Wendlebury, Heyford Park, Kidlington	9. Shipton Quarry	10. Wendlebury, Shipton Quarry	11. Heyford Park, Shipton Quarry	12. Wendlebury, Heyford Park, Shipton Quarry
2	★1	★1	★1	★1	★1	★1	★1	★1	★1	★1	★1

- 6.2.47 There are a **range of objectives** that fall under the broad ‘communities’ heading, including relating to crime, digital infrastructure, education and skills, health and poverty / disadvantage and social exclusion. However, it is considered appropriate to present a single, rounded discussion, at this stage.
- 6.2.48 A headline consideration is the need to ensure that new and existing communities have good access to **community infrastructure** with capacity. As part of this, there is a need to avoid creating or exacerbating capacity issues and support growth strategies that would deliver new or upgraded community infrastructure, including in response to existing issues / opportunities (such that there is ‘planning gain’). Another issue can also be ensuring community infrastructure has sufficient patronage/use to remain viable, although this is primarily an issue for rural areas (e.g. primary schools), so less relevant here.
- 6.2.49 Beginning with **Shipton Quarry**, there is a good opportunity to deliver a comprehensive new community, with a clear sense of place within the landscape, including mindful of the potential to focus development on the quarry, railway line and the meander of the River Cherwell / bend in the Oxford Canal. Also, a scheme could relate suitably well to higher order settlements at Woodstock and Kidlington. However, the discussion of a possible western expansion, which would break the boundary of the A4260 (Banbury Road) and risk closing the landscape gap to Woodstock, potentially runs contrary to the above statements.
- 6.2.50 A further consideration is that development here would have *relatively* limited impact on existing communities, albeit there would be impacts to the adjacent community of Shipton-on-Cherwell. Also, and more generally, the River Cherwell corridor is a historic settled landscape (see further discussion below).
- 6.2.51 **Heyford Park** expansion is also generally supported, from a communities perspective. As has been discussed, there is a broad aim to reach a critical mass, in terms of homes and jobs, and support the achievement of a long term vision for the site as a whole (including the former airfield conservation area).

- 6.2.52 It is not clear that the new proposed southern extension (1,235 homes) will *directly* deliver new *strategic* community infrastructure to the benefit of the existing / wider community (i.e. community infrastructure over-and-above that which is needed to 'consume the smoke' of the new proposed homes). However, there will always be benefits associated with directing developer contributions towards the delivery of improvements to local community and green infrastructure that can be accessed by existing communities, and there is considered to be a particular opportunity, in this respect, at Heyford Park. Also, as has been discussed, there is an expectation that growth will directly support improved transport connectivity.
- 6.2.53 With regards to the matter of impacts to existing communities: on the one hand, there is likely to be relatively low concerns in respect of impacts to the existing community at Heyford Park; however, on the other hand, there is a need to consider impacts to the series of rural villages that encircle Heyford Park. This is primarily in terms of road traffic (on the assumption that maintenance of a landscape gap to Upper Heyford can be assumed in perpetuity, given the conservation area designation), which serves to highlight the importance of securing strategic transport infrastructure upgrades, and increased trip internalisation.
- 6.2.54 Moving on to **Wendlebury**, there is a need to recall the current assumption of a ~1,000 home scheme, in contrast to the much larger scheme proposed by the site promoters. A primary consideration here is potentially impacts to Wendlebury, which is a historic parish. Development would wrap around the existing community, and so clearly lead to impacts, albeit there would be the potential for mitigation, and there would be the potential to deliver significant new infrastructure to the benefit of the existing community, e.g. a primary school and improved road and cycle connectivity. Also, there may be an opportunity to address the flood risk that currently affects the village, as discussed. Other wider considerations are then in respect of the potential to deliver comprehensive western expansion of Bicester, as far as the M40 and flood risk zones, via growth at Wendlebury in-combination with mixed use growth to the north of the A41, including with a long term aspiration to transform transport connectivity / support modal shift, as discussed above.
- 6.2.55 The final site in question is **Kidlington** (North of the Moors), which is associated with fairly limited communities-related issues and opportunities, as a smaller site that would form a fairly modest extension to a higher order settlement. The site benefits from good proximity to the centre of Kidlington, and the proposal is to deliver significant new green space (e.g. a village green and/or a cricket pitch, subject to further investigation). There is a need to consider the public footpaths passing through / adjacent to the site, as well as road access (the Moors is a link road, between main road, shown by the Transport Assessment (2022) to experience significant peak time traffic), but no particular issues are envisaged at this stage. There are also considerations around meeting local housing needs, as discussed further below.
- 6.2.56 Aside from access to community infrastructure, a related consideration is access to **green / blue infrastructure**, including high quality countryside. In this respect, Shipton Quarry and Kidlington are both considered to perform well, particularly given their association with the River Cherwell and canal corridor.
- 6.2.57 With regards to Heyford Park, the proposed development location is associated with a raised plateau landscape, somewhat distant from the river / canal corridor to the west; however, there is still reasonable access to the countryside via public rights of way, including via a historic bridleway (Aves Ditch). The possibility of growth supporting increased accessibility to Middleton Park might feasibly be explored.
- 6.2.58 Finally, with regards to Wendlebury, there is reasonable access to the expansive landscapes of the Upper Ray Meadows via public rights of way, including a bridleway that links M40 J9 to Otmoor. However, there is a concern regarding impacts to route 51 of the National Cycle Network (NCN), which currently links expanding Bicester Garden Town to high quality countryside to the west, via quiet rural lanes and the historic village of Wendlebury, where there is a historic and presumably popular public house.
- 6.2.59 In **conclusion**, all the variable site options in question are associated with a degree of merit, from a communities perspective, subject to further discussions with key stakeholder organisations. All sites would give rise to certain tensions with existing communities (perhaps least so Kidlington, as a smaller site), and it is not clear that any would deliver specific *strategic* community infrastructure (e.g. a secondary school) to the benefit of existing communities; however, it is possible to pinpoint some significant potential for growth to benefit existing communities and so deliver 'planning gain'.
- 6.2.60 In this light, it is difficult to differentiate between the growth scenarios, beyond highlighting a concern with Scenario 1, as a low growth scenario that could lead to pressure for growth at sites that are problematic, from a communities perspective. For example, there could be pressure for small urban extensions that deliver little in the way of new community infrastructure, and potentially lead to problematic pressure on existing infrastructure (although there are also certain 'communities' arguments for dispersing growth).

6.2.61 With regards to **significant effects**, there is a need to consider the package of allocations that are a constant across the reasonable growth scenarios, as discussed in Section 5 and Section 9. These sites are associated with a range of communities-related issues / opportunities. In this light, **mixed effects** are predicted at this stage (see further discussion in Section 9).

Employment & economic growth

1. Constants only	2. Wendlebury	3. Heyford Park	4. Wendlebury, Heyford Park	5. Kidlington	6. Wendlebury, Kidlington	7. Heyford Park, Kidlington	8. Wendlebury, Heyford Park, Kidlington	9. Shipton Quarry	10. Wendlebury, Shipton Quarry	11. Heyford Park, Shipton Quarry	12. Wendlebury, Heyford Park, Shipton Quarry
3	2	2	★1	3	★1	★1	★1	★1	★1	★1	★1

6.2.62 As discussed in Section 5.5, the approach to employment land allocation is broadly held constant across the reasonable alternative growth scenarios. However, all of the variable site options bar Kidlington would deliver some new employment land, specifically:

- **Shipton Quarry** - would deliver significant new employment land (see Figures 6.2 and 6.3). There is no identified need to support new employment land in this area; however, there is merit to delivering employment land as part of any new settlement, and new employment here would be quite closely linked to the existing and growing strategic employment hub at Kidlington / Begbroke / Oxford City Airport (located only ~2km to the south), such that there could be an argument for extending the Oxfordshire Knowledge Spine spatial concept to the north, to include a new settlement at Shipton Quarry. There could also be merit to new employment land closely linked to an expanding Woodstock.
- **Wendlebury** – would likely deliver some modest employment land, specifically adjacent to the M40 / A41 junction. Also, as has been discussed, development at Wendlebury could be supportive – and potentially quite strongly supportive – of long term aspirations for delivering transport and connectivity improvements at Bicester, which is a significant consideration from a perspective of seeking to ensure the town is able to realise it’s potential as a focal point for employment / economic growth at the junction of the Oxfordshire Knowledge Spine and the Oxford to Cambridge Arc. The possibility of a delivering a Modern Methods of Construction (MMC) facility has also been discussed (albeit in the context of 2,800 home allocation), which could be supportive of sub-regional growth objectives.
- **Heyford Park** – it is not anticipated that the 1,235 home extension would directly deliver any new employment land. However, as discussed, it could well be supportive of long term aspirations for sensitive development / redevelopment / refurbishment / repurposing of buildings within the airfield conservation area, including with a focus on employment floorspace – see Figure 6.1. It is understood (from the site promoter’s submission to the Options consultation, 2021), that Heyford Park currently supports ~100 businesses, including within Creative City (which involved refurbishing six buildings). Also, the recently granted planning permission for 1,175 homes (18/00825/HYBRID) includes some new employment land. It is understood that the ratio of homes to jobs within Heyford Park will be around 1:1 once the consented scheme(s) come forward, which serves to highlight (when taken into account alongside the heritage context) the potential to develop / foster a unique employment land offer. However, having said this, there is a need to recall Heyford Park’s relatively rural location.

6.2.63 Finally, with regards to **Kidlington**, whilst the site would not deliver new employment land, there is a need to consider that the site is located within walking / easy cycle distance of a major employment land hub.

6.2.64 Another important consideration is the matter of supporting **Oxford**, which is key strategic importance from an economic growth perspective – e.g. [Figure 2](#) from the Oxfordshire Rail Corridor Strategy (2021), which is repeated below as Figure 9.1. At this stage it is not clear that there are any unmet needs for employment land that might need to be provided for within Cherwell; however, providing for Oxford’s unmet housing needs is vitally important, from a perspective seeking to support economic growth objectives.

6.2.65 In **conclusion**, it is appropriate to flag a concern with the lower growth scenarios, as economic growth could be constrained and/or there would be risk of an imbalance between employment and housing growth (albeit this is partly a transport matter, given potential for in-commuting). Delivering limited new employment land at Heyford Park, Shipton Quarry and/or Wendlebury is supported, whilst housing growth at Kidlington is supported from a perspective of delivering new homes relatively close to Oxford.

N.B. under the highest growth scenarios it could be that, in practice, there is a need to identify additional employment land to ensure a balance between housing and employment growth. As discussed in Box 5.2, one option is further strategic employment growth to the east of the M40 at Banbury; however, this would likely primarily involve warehousing / distribution, which is associated with a low jobs density, and it is generally the case that employment growth here would contribute little to key strategic objectives.

6.2.66 With regards to **significant effects**, under all growth scenarios the assumption is that there would be new employment land allocations sufficient to meet needs, as understood from the HENA (2022). However, there would be a risk of an imbalance between new homes and jobs locally under the lower growth scenarios. As such, **moderate or uncertain positive effects** are predicted for the higher growth scenarios only. It will be important for stakeholder organisations to comment in detail through the current consultation, informed by the HENA.

Historic environment

1. Constants only	2. Wendlebury	3. Heyford Park	4. Wendlebury, Heyford Park	5. Kidlington	6. Wendlebury, Kidlington	7. Heyford Park, Kidlington	8. Wendlebury, Heyford Park, Kidlington	9. Shipton Quarry	10. Wendlebury, Shipton Quarry	11. Heyford Park, Shipton Quarry	12. Wendlebury, Heyford Park, Shipton Quarry
★ 1	2	2	2	2	2	2	2	2	2	2	2

6.2.67 All four of the variable site options are subject to a degree of historic environment constraint:

- **Kidlington** (North of the Moors) – stands out as potentially subject to the highest degree of constraint, despite being a smaller sites (~300 homes), on account of the adjacent Kidlington Conservation Area, which includes a prominent Grade I listed church and a high density of Grade II listed buildings. There is also a need to account for the historic footpath that runs adjacent to the site, linking the conservation area to the Oxford Canal (and specifically a listed bridge), via a listed bridge over the railway. However, the firm proposal is to avoid or suitably mitigate impacts by delivering a large area of open space at the eastern extent of the scheme, as a buffer to the conservation area. Also, the proposal is that growth will not extend beyond the railway and so not encroach on the Oxford Canal. It is also important to note that the eastern extent of the Moors is associated with a degree of historic character, with two Grade II listed buildings, including one that would be near adjacent to the likely new access junction for the development site, and is associated with a series of trees with TPO designation. It is also understood that there is likely to be archaeological constraint affecting the site (to be confirmed).
- **Heyford Park** – is likely the next most constrained of the variable site options.
 - This is primarily on account of the proposed development being located adjacent to two conservation areas. With regards to the Rousham, Lower Heyford and Upper Heyford Conservation Area, the primary concern is potentially associated with road traffic impacts to Lower Heyford, where there is a train station, and via which there is access to the A4260, which is the most direct route to Kidlington and Oxford. With regards to the RAF Upper Heyford Conservation Area (N.B. the site actually intersects to a small extent), it will be for Historic England to comment in detail, but the current assumption is that development (of mainly greenfield land to the south of the conservation area) would give rise to limited concerns, and could give rise to an opportunity, in terms of supporting investment in sensitive, heritage-led intensification within the conservation area in the long term.

- Aside from matters relating to the two conservation areas, there is a need to consider the possibility of problematic traffic through other historic villages, such as Ardley and Somerton, where there are designated conservation areas, as well as traffic past Grade II listed Middleton Stoney Park. However, in practice there is an expectation that development will not come forward before 2030 or without clear mechanisms in place to ensure the necessary transport infrastructure is forthcoming.
- Finally, there is a need to note that the both the western and eastern site boundaries comprise historic linear features, namely Portway to the west (a Roman Road) and Aves Ditch to the east (not a scheduled monument, but nonetheless of ancient origin and of clear historic environment value).

- **Shipton Quarry** – is potentially subject to similar degree of constraint as is the case for Heyford Park. This reflects its association with the River Cherwell corridor, which is a landscape strongly associated with historic settlement, and its position adjacent to the Oxford Canal Conservation Area. In particular, the cluster of villages to the immediately to the south (Shipton-on-Cherwell, Hampton Gay and Thrupp) is associated with a blanket conservation area, and a notable feature is two churches in close proximity, on either side of the river, although it is noted that one of the churches is only Grade II listed, with the other Grade II*. Also, at Enslow, to the north, the Oxford Canal Conservation broadens-out, to take in an area historically associated with a mill, a wharf and a former railway station. Finally, it is important to note that there is a small scheduled monument (a long barrow) within the greenfield part of the site located to the northwest of the quarry. The feature is below ground (the field in question is under arable cultivation, and the outline of the archaeological feature is barely visible on historic satellite imagery, if at all), but it is an important constraint nonetheless. In this light, it is concerning that it is not highlighted or mentioned as a constraint within the promotional materials that have been provided to date.

- **Wendlebury** – is *potentially* the least constrained of the four variable site options, given no designated conservation area, a parish church that is only Grade II listed (the lowest grade, plus it is located near adjacent to the A41) and a total of just nine Grade II listed buildings within the village. However, it is nonetheless the case that the village has a clear historic character, and is likely quite highly appreciated by the residents of an expanding Bicester Garden Village, including given its location on NCN Route 51.

Another important consideration is the location of an extensive scheduled monument adjacent to the north of the site, which is the site of the Roman settlement of Alchester (considerable detail / indicative detail is shown on the [pre-WWI OS map](#)). The site promoters discuss the potential to support access to / appreciation of the scheduled monument, which is supported; however, it could well be the case that there is high archaeological sensitivity within the site, linked to the scheduled monument.

Also, there is also a need to consider the impacts of a possible new southern Bicester link road (albeit there is a likelihood of the link road continuing to be considered as an option regardless of development). The site promoters suggest this might follow the route of the lane located to the south of the bulk of the scheduled monument, which is clearly less sensitive than the lane to the north (which the promoters suggest could be downgraded to a cycle / pedestrian route); however, there is still a potential concern.

- 6.2.68 In **conclusion**, it is considered appropriate to conclude support for the lowest growth scenario. This reflects the fact that national designations constrain all of four of the variable sites (albeit three are also potentially associated with heritage-related opportunities around targeted investment and increased access / appreciation).
- 6.2.69 With regards to **significant effects**, it is appropriate to predict **moderate or uncertain negative effects** under all scenarios, mindful of the package of sites that are held constant across the growth scenarios, which does include certain sites subject to notable historic environment constraint. However, it is recognised that all sites are ‘strategic’ in scale, and at such sites there is invariably good potential to avoid or suitably mitigate historic environment impacts through masterplanning, landscaping and design measures, and there can also be the potential to enhance appreciation of historic environment assets and historic landscapes. Historic England may wish to comment further through the current consultation, including in respect of growth-related historic environment constraints and opportunities at Heyford Park.

Homes

1. Constants only	2. Wendlebury	3. Heyford Park	4. Wendlebury, Heyford Park	5. Kidlington	6. Wendlebury, Kidlington	7. Heyford Park, Kidlington	8. Wendlebury, Heyford Park, Kidlington	9. Shipton Quarry	10. Wendlebury, Shipton Quarry	11. Heyford Park, Shipton Quarry	12. Wendlebury, Heyford Park, Shipton Quarry
12	10	9	5	11	8	7	4	6	3	2	1

6.2.70 As discussed in Section 5, whilst there is a clear argument for setting the housing requirement at 1,292 dpa, there are also certain arguments for higher growth. There is also a need to ensure a suitable supply buffer over-and-above the housing requirement, with a view to ensuring that the housing requirement is met in practice, over the course of the plan period (i.e. avoiding a situation whereby the district is unable to demonstrate a five year housing land supply, albeit under such a scenario the presumption in favour of sustainable development would apply, potentially serving to realign housing supply with the requirement).

6.2.71 Assuming that the housing requirement is set at 1,292 dpa, then the supply buffer across the growth scenarios would vary between 8% (Scenario 1) and 25% (Scenario 12). The appropriate size of the supply buffer must reflect the extent of delivery risk across the package of proposed sites / supply components.

6.2.72 A supply buffer of 8% is potentially somewhat low (even accounting for the fact that there will be good potential to identify additional supply subsequent to the current consultation). As such, **Scenario 1** is judged to perform poorly. Under Scenario 1 there could be a need to set the housing requirement at a figure below 1,292 dpa (to achieve a sufficient supply buffer), such that there would be a risk of not meeting local housing needs (LHN), as understood on the basis of the analysis presented in the HENA (see Section 5.2) and/or relying overly on the other Oxfordshire districts to provide for Oxford City's unmet needs.

N.B. the HENA's cannot be summarised in full here. However, it is considered appropriate to highlight that a proactive approach to housing growth in Oxfordshire, over the past 20 years, has helped to address the issue of housing unaffordability. Paragraph 4.2.5 of the HENA explains that *"stronger new-build development thus correlates to...weaker house price growth relative to the region."*

6.2.73 With regards to the highest growth scenario (**Scenario 12**), the housing requirement might feasibly be set at a figure in the region of 1,400 dpa. Under this scenario the supply buffer would be 15%, which is quite high, but could potentially be seen as appropriate upon further investigation.

6.2.74 As discussed within the HENA (also see Section 5.2), there is an argument to suggest that higher housing growth (e.g. 1,400 dpa) could represent a strategy that involves meeting LHN *if* LHN is defined so as to reflect the aspirations of the Oxfordshire LEP's Local Industrial Strategy Investment Plan. However, this is not the most likely scenario, including mindful of the current economic climate. Were it to transpire that economic growth is higher than that which is anticipated under a 1,292 dpa housing requirement scenarios, then this could be addressed through the next local plan review, to boost the rate of housing growth (in order to avoid unsustainable rates of in-commuting and/or increased house prices).

6.2.75 There can also be an argument for higher growth in order to more fully meet **affordable housing needs**, mindful of the following statement within the Government's Planning Practice Guidance (PPG; Paragraph: 024 Reference ID: 2a-024-20190220): *"An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes."*

6.2.76 Cherwell's affordable housing needs are set out in the HENA, which presents the outcomes of two models. The first model suggests that all housing schemes would need to deliver affordable housing at a rate of 50% in order to meet Cherwell's affordable housing needs in full, whilst the other suggests a rate of 35%. Also, there is a need to be mindful of affordable housing need in Oxford City, which is very acute, as set out in the HENA.

- 6.2.77 However, the analysis is “indicative”, including because “*the relationship between affordable housing need and overall housing need is complex.*” The HENA does not recommend a boost to the housing requirement due to affordable housing needs, but concludes: “*The analysis is... set out with the intention of informing the setting of housing targets within local plans, alongside other components of this HENA.*”
- 6.2.78 The HENA also concludes: “*In setting policies for affordable housing, in terms of the percentage requirement to be met through eligible development schemes, viability evidence will be a key driver.*” In practice, it is understood that 35% affordable housing is likely to prove challenging in the Cherwell context, given development viability and other competing funding objectives, e.g. around infrastructure and decarbonisation; however, this is a matter for discussion in Section 9.
- 6.2.79 Finally, with regards to the specific site options that are a focus of this current appraisal (i.e. those that are a variable across the growth scenarios), there are three points to make:
- Kidlington – is supported as a medium sized site not thought likely to be associated with issues that could delay delivery or lead to arguments for reduced affordable housing. Also, Kidlington is associated with relatively low recent and committed housing growth, as a proportion of dwelling stock, relative to Banbury and Bicester, which could have a bearing on relatively high house prices (also, anecdotal evidence suggests a prevalence of properties being sub-divided), albeit there is high committed growth in the wider sub-area. Finally, as has been discussed, Kidlington benefits from proximity to Oxford.
 - Shipton Quarry and Wendlebury – are in relatively close proximity to Oxford, and as larger site options there would be potential to deliver a good mix of housing onsite, potentially to include specialist housing, and there would also be the potential to consider provision of pitches for Gypsies and Travellers, if necessary (on the basis of an understanding of needs, as discussed further in Section 9).
 - Heyford Park – the site promoters seek to emphasise that there is a ‘delivery model’ in place that leads to low delivery risk and also low risk of unforeseen cost issues, e.g. that could have a bearing on affordable housing delivery. They emphasise “*a delivery model that provides a wide range and choice of products and includes the Private Rental Model (PRM). There is a wide range and choice of market housing together with affordable homes (affordable homes are delivered by Heyford Regeneration)...*”
- 6.2.80 In **conclusion**, the alternatives are ranked in order of total growth quantum.
- 6.2.81 With regards to **significant effects**, it is appropriate to predict differential significant effects, ranging from **significant negative effects** to **significant positive effects**.

Land, soils and resources

1. Constants only	2. Wendlebury	3. Heyford Park	4. Wendlebury, Heyford Park	5. Kidlington	6. Wendlebury, Kidlington	7. Heyford Park, Kidlington	8. Wendlebury, Heyford Park, Kidlington	9. Shipton Quarry	10. Wendlebury, Shipton Quarry	11. Heyford Park, Shipton Quarry	12. Wendlebury, Heyford Park, Shipton Quarry
2	2	2	2	2	1	2	2	1	1	2	1

- 6.2.82 A foremost consideration here is the need to avoid the loss of agricultural land classed as ‘best and most versatile’ (BMV), which the NPPF defines as that which is grade 1 (highest quality), grade 2 or grade 3a. The nationally available agricultural land quality dataset shows significant variation in agricultural land quality across the borough; however, this dataset has low accuracy (it does not differentiate between grades 3a and 3b) and very low spatial resolution, such that it must be used with caution. Another dataset is available showing agricultural land quality with a much higher degree of resolution and accuracy, namely the “post 1988” dataset (which reflects the outcomes of field surveys); however, this dataset is very patchy.
- 6.2.83 Taking the sites in turn:

- **Heyford Park** – is potentially the most constrained, in that it is most likely to comprise BMV agricultural land, on the basis of the nationally available provisional dataset. Specifically, whilst it shows the great majority of the site to comprise ‘Grade 3’ quality land (which may or may not be BMV), the eastern extent of the site is shown to comprise Grade 2 quality land (which is likely to be BMV in practice).
- **Kidlington** – comprises Grade 3 quality land, according to the nationally available dataset.
- **Sipton Quarry** – is obviously partly degraded land, namely a former quarry, but the proposal is also to develop significant areas of agricultural land to the north, south and east of the quarry. The national dataset shows Grade 3 quality land in this area, although there is also a notable band of Grade 4 quality land (i.e. land that is not likely to be BMV in practice) following the river corridor.
- **Wendlebury** – is strongly associated with an area of land that the national dataset shows to be Grade 4 quality, such that it is not likely to comprise BMV agricultural land in practice.

N.B. it is unfortunate that none of these key site options have been surveyed in detail (‘post 1988 criteria’). Site promoters are encouraged to submit survey work to the national register, with a view to informing the local plan process, as opposed to waiting until the planning application stage (given limited or no potential to avoid / mitigate loss of agricultural land through the development management process).

- 6.2.84 A further consideration is the need to avoid sterilisation of minerals resources that could potentially be viably extracted, with Heyford Park intersecting a Minerals Safeguarding Area, as understood from the [policies map](#) of the Oxfordshire Minerals and Waste Local Plan (2017). However, it is also important to note that safeguarding is not absolute, as explained by the Minerals Safeguarding Practice Guidance (Mineral Products Association, 2019): “Allocation of sites for non-minerals development within MSAs and proximate to safeguarded minerals infrastructure sites should be avoided where possible... However, safeguarding is not absolute. Where other considerations indicate that a proposed site allocation within an MSA is appropriate... [employ] mitigation measures to reduce the... amount of resource sterilised.”
- 6.2.85 In **conclusion**, it is fair to highlight Heyford Park as likely subject to a degree of constraint. With regards to growth quantum, it is not possible to suggest that lower growth is preferable, as Cherwell District does not stand-out as relatively constrained in the sub-regional context. For example, South Oxfordshire has a notably higher coverage of land shown to be Grade 2 quality land by the nationally available dataset.
- 6.2.86 With regards to **significant effects**, having taken account of the package of site allocations that are a constant across all scenarios, it seems likely that there would be a significant loss of BMV land under any scenario, such that there is a need to predict **moderate or uncertain negative effects** across the board. The most constrained site is likely to be the proposed allocation to the south of Banbury, which is shown by the national dataset to comprise Grade 2 quality land.

Landscape

1. Constants only	2. Wendlebury	3. Heyford Park	4. Wendlebury, Heyford Park	5. Kidlington	6. Wendlebury, Kidlington	7. Heyford Park, Kidlington	8. Wendlebury, Heyford Park, Kidlington	9. Sipton Quarry	10. Wendlebury, Sipton Quarry	11. Heyford Park, Sipton Quarry	12. Wendlebury, Heyford Park, Sipton Quarry
2	1	1	2	2	2	2	2	2	2	2	2

- 6.2.87 A landscape study has been prepared recently to inform plan-making, and its findings are reported in Section 5 of this report, which deals with the process of arriving at reasonable alternative growth scenarios. Taking the sites in turn:

- **Kidlington** (North of the Moors) – is located within the Oxford Green Belt; however, the Green Belt Study (2022) identifies the site (specifically, the part of the wider Green Belt parcel that is under consideration for removal from the Green Belt) as making only a ‘moderate’ contribution to Green Belt purposes. The Landscape Study (2022) does not assess the site; however, there is likely to be a degree of sensitivity, given the footpaths passing through and adjacent to the site, which are likely to be quite popular walking routes, and also mindful of the adjacent Kidlington Conservation Area. On the other hand, the site benefits from strong containment, in landscape terms, on the assumption that there would not be further development ‘creep’ to the north or west, i.e. a long term defensible Green Belt buffer would be maintained between the northern edge of Kidlington and the River Cherwell / Oxford Canal corridor. It could be suggested that the effect of development would be to increase the close association of Kidlington with the River Cherwell, albeit the village was historically associated with a transport corridor following slightly raised ground between the River Cherwell and the Rowel Brook corridors. A final point to note is that the land does rise slightly, within the site, away from the settlement boundary.
- **Shipton Quarry** – is the next site for consideration, mindful that the quarry and land to the east and south falls within the Oxford Green Belt, with only the proposed land parcel to the northwest falling outside of the Green Belt. There is likely to be some capacity in Green Belt terms, including mindful of the location of the site at the very edge of the Green Belt, and the Landscape Study assigns the site ‘low-medium’ sensitivity (with the assumption that the scheme would extend beyond the quarry). There is also good potential for effective containment in most directions, namely containment provided by the River Cherwell / Oxford Canal corridor to the south and east, and a notable hill (Whitehill) to the north (also a thick hedgerow / tree belt). However, there is a concern regarding development creep / sprawl to the west of the A4260, with the site promoters suggesting that a further 2,500 homes could be delivered here in the future. It is commendable for the site promoters to be open about their long term aspirations; however, there would be a concern regarding the potential for effective containment of growth within a relatively flat and featureless landscape, given the location of Woodstock to the west, albeit there would be some potential to draw on topography to form a defensible long term boundary, ensuring that any new settlement remains firmly associated with the Cherwell valley / corridor.
- **Wendlebury** - has a strong rural and historic character, which is likely to be recognised and appreciated, as has been discussed above. However, the Landscape Study assigns only ‘low-moderate’ sensitivity, and there would be the potential for growth to be very well contained by the M40 and flood risk zones.
- **Heyford Park** – is associated with a raised plateau landscape, between the valleys of the River Cherwell to the west and the River Ray to the east, hence there is inherently a degree of concern regarding development ‘spilling’ down-hill over time. However, the current proposed development site (1,235 homes to the south of the airfield conservation area) is quite well contained on three sides, namely by a conservation area to the west, the built form of the existing settlement / airfield conservation area to the north and by the blanket conservation area covering the Cherwell valley settlements to the west. It is only to the northeast and to the south where containment is less strong. In particular, there is a clear concern regarding further development creep to the south, as far as Lower Heyford Road. The site promoters have not expressed an interest in further growth in this direction, but there will nonetheless be a need to give consideration to maintaining a long term landscape buffer to the road, from which links areas of historic environment sensitivity, and from which there are quite expansive views.

6.2.88 In **conclusion**, the appraisal is finely balanced, but overall there is judged to be support for Wendlebury and Heyford Park over Kidlington and Shipton Quarry. With regards to growth quantum, it is not clear that there are any in-combination concerns, and it could feasibly be the case that directing growth to both Heyford Park and Shipton Quarry supports targeted investment in enhancements along the River Cherwell / Oxford Canal corridor, as has been discussed under other headings. It would not be appropriate to conclude an inherent concern with higher growth, mindful of constraints affecting the other Oxfordshire authorities (AONB, the sensitive Oxford urban edge / the need to maintain Oxford’s historic association with river corridors), albeit southern Northants is broadly subject to limited constraint.

6.2.89 With regards to **significant effects**, having taken account of the package of site allocations that is held constant across the growth scenarios, it is considered appropriate to predict broadly **neutral effects**. However, a number of the ‘constant’ sites are associated with a degree of constraint, e.g. SE Bicester.

Transport

1. Constants only	2. Wendlebury	3. Heyford Park	4. Wendlebury, Heyford Park	5. Kidlington	6. Wendlebury, Kidlington	7. Heyford Park, Kidlington	8. Wendlebury, Heyford Park, Kidlington	9. Shipton Quarry	10. Wendlebury, Shipton Quarry	11. Heyford Park, Shipton Quarry	12. Wendlebury, Heyford Park, Shipton Quarry
5	3	4	2	3	2	2	2	2	1	2	2

6.2.90 Supporting the achievement of transport objectives is of great importance locally, and there is a need for a strategic approach, informed by work led by the County Council. Transport objectives have close ties to a wider range of other planning and sustainability objectives, including in respect of decarbonisation, health / wellbeing and economic growth. With regards to decarbonisation objectives, it is important to be clear that supporting the achievement of strategic transport objectives is one of the primary mechanisms by which local plans can serve to minimise per capita greenhouse gas emissions and, in turn, support the achievement of decarbonisation targets (although the role of local plans in terms of minimising per capita emissions from the built environment should not be overlooked, as discussed above).

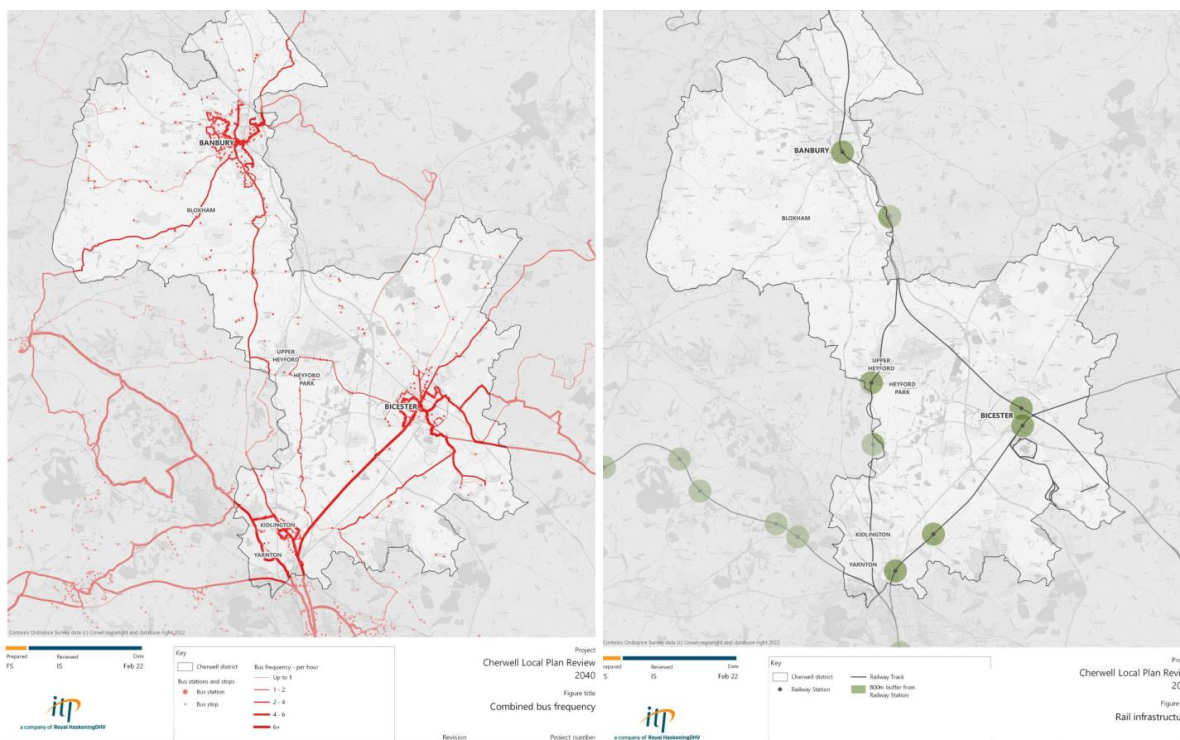
6.2.91 As an initial point, there is merit to favouring large mixed use schemes that will tend to support, or enable: a degree of self-containment, i.e. a situation whereby residents' need to travel beyond the local area is minimised and, in turn, there are relatively high rates of walking and cycling; good access to high quality transport infrastructure (with capacity), in particular public transport infrastructure, such that longer trips (in particular commuting trips at peak times) can be made in such a way that minimises per capita greenhouse gas emissions and traffic congestion; masterplanning best practice, including mobility hubs and high quality active travel infrastructure; and 'Future mobility' interventions and related digital solutions, e.g. around transport on demand.

6.2.92 In this light, and building upon the discussion presented under 'Air quality', considerations include:

- **Heyford Park** – is associated with a raised location between transport corridors, and the Transport Assessment (2022) assigns an overall connectivity score of 3 (out of 7), which is lower than that assigned to Kidlington (7) and eight villages. However, a key aim of directing further growth to Heyford Park is to support investment in transport infrastructure, and support an improved bus service, and it is noted that the intention is to phase development in line with infrastructure delivery. Also, and as discussed, an effect of growth through the LPR could be to support long term investment in Heyford Park as a whole, to enable achievement of a long term vision whereby the settlement grows to *perhaps* in the region of 5,500 homes, and can support a homes to jobs ration of around 1:1 (see discussion under 'Air quality'). A settlement of this nature could be associated with good levels of self-containment / trip internalisation. Finally, there is a need to be mindful of the wider context, in particular the potential for a new train station at Ardley, with the LPR set to safeguard the site in question.
- **Shipton Quarry** – is also associated with some inherent transport challenges, on account of its location near equidistant between the district's two main road corridors, namely the A44 and the A34. However, there are also a range of transport-related arguments in favour of the site and the specific proposed scheme. In particular, there is a firm commitment to deliver a new train station, albeit this would not be centrally located within the site. Also, the site benefits from good proximity to Kidlington (most importantly) and Woodstock. Furthermore, there is merit to the proposed scheme, with transport infrastructure, innovation etc seemingly a central pillar of the masterplanning concept, plus the proposal to deliver significant new employment land onsite is supported. However, as per all the sites in question, there is a need to be mindful that the proposed scheme is subject to change. Indeed, the assumption here is that the scheme would deliver ~2,000 homes, mindful of onsite constraints (notably biodiversity and historic environment), in contrast to the ~2,500 homes discussed by the site promoter.
- **Heyford Park and Shipton Quarry** – allocation of both sites in combination (Scenarios 11 and 12) could well lead to transport challenges, given shared road corridors, and distance to primary road corridors.

- **Wendlebury** – is quite well-connected, and development could be supportive of strategic transport objectives for Bicester. In particular, higher growth at Bicester – and potentially growth at Wendlebury in particular – could facilitate delivery of a southern link road, which could (subject to further investigation) do much to address current issues of traffic congestion. More specifically, the effect could be to greatly reduce traffic along the A41 to the west of Bicester, potentially enabling the road corridor to be reimagined as a public transport and walking / cycling corridor, acting as a ‘gateway’ to Bicester Garden Town and linking growth locations / Bicester P&R (which could develop into a ‘transport hub’) to Bicester Village and the town centre. However, there is much uncertainty at this stage, including mindful that the current assumption is a scheme of ~1,000 homes, in order to avoid flood risk zones and associated biodiversity constraint, which is in stark contrast to the ~2,800 homes discussed by the site promoter. There could be a need for considerable investment to achieve good road access to the site.
- **Kidlington (North of the Moors)** – is broadly supported, from a transport perspective, given excellent potential to walk / cycle to key destinations, including: schools and other services / facilities in Kidlington; strategic employment areas at Kidlington / Oxford City Airport and Begbroke; and Oxford Parkway Station. However, it is recognised that there is no rail connectivity (the Partial Review key diagram presents an indicative location for a new train station between Yarnton and Kidlington, but delivery cannot be assumed), and that the site is located between primary bus corridors. There is also a need for further work to confirm the potential to achieve good access to the site from the Moors.

Figure 6.7: Two key figures from the Cherwell LPR Transport Assessment (2022), showing bus connectivity (left, e.g. highlighting a limited frequency service for Heyford Park) and the location of existing train stations (right)



6.2.93 In **conclusion**, there is a concern with Scenario 1, as the effect could be problematic in-commuting and/or pressure for growth elsewhere in Oxfordshire, at locations that perform less well in transport terms. It is also appropriate to flag Heyford Park as performing less well, in transport terms, than the other three variable sites (albeit there are certain transport-related arguments in favour of further growth).

6.2.94 With regards to **significant effects**, it is appropriate to predict differential significant effects, ranging from **significant negative effects** to **moderate or uncertain positive effects**, given the strategic importance of the issues. With regards to the package of sites that are held constant across the reasonable growth scenarios, it is fair to say that all have been identified as suitable / potentially suitable for allocation largely on the basis of strong performance in transport terms. However, it is nonetheless the case that several are associated with certain transport-related issues, as discussed in Section 9.

N.B. there is some uncertainty ahead of further work on transport strategy. The Transport Assessment (2022) explains: “At the time of writing an Area Strategy is being developed for Cherwell as part of the Oxfordshire LTCP. This may introduce new / alternative sustainable transport projects...”

Water

1. Constants only	2. Wendlebury	3. Heyford Park	4. Wendlebury, Heyford Park	5. Kidlington	6. Wendlebury, Kidlington	7. Heyford Park, Kidlington	8. Wendlebury, Heyford Park, Kidlington	9. Shipton Quarry	10. Wendlebury, Shipton Quarry	11. Heyford Park, Shipton Quarry	12. Wendlebury, Heyford Park, Shipton Quarry
★ 1	★ 1	★ 1	★ 1	★ 1	★ 1	★ 1	★ 1	★ 1	★ 1	2	2

6.2.95 **Wastewater treatment** is typically the issue that has the greatest bearing on the consideration of local plan reasonable alternative growth scenarios. Capacity at existing treatment works can often be increased to accommodate increased flows (at least hydraulic capacity of the works; biological and chemical capacity of the receiving water course to accept an increase in treated water can prove more challenging). However, there are cost implications, and a risk of unforeseen issues and delays. As such, there is merit to directing growth to locations with existing capacity and/or no barriers to increased capacity.

6.2.96 However, there is currently limited available evidence to enable differentiation between the degree of constraint affecting existing treatment works and, in turn, the merits of competing growth locations that are a variable across the 12 reasonable alternative growth scenarios. Evidence comes from the Oxfordshire Water Cycle Study (2021), which was prepared with a view to informing the Oxfordshire Plan, prior to a decision being made not to progress the plan; however, the report's conclusions are high level:

“An assessment of wastewater treatment capacity found that there are significant differences in the percentage of existing treatment capacity which would be used up by growth, depending on the spatial option selected, with the greatest pressure coming from Option 2 which focusses all growth around Oxford. Whilst this spatial scenario would be highly likely to require a very significant expansion of treatment capacity at Oxford, and possibly at Abingdon and other smaller works close to the City, this does not necessarily make this an unfavourable option. Large upgrades at a small number of key works may be more efficient than upgrading large numbers of much smaller treatment works...”

6.2.97 As a general point, it is fair to say that large scale strategic growth locations can tend to be associated with a degree of merit, relative to a strategy involving greater dispersal of growth across smaller sites. They provide an opportunity to arrange infrastructure in an idealised way and can support innovative systems, including an ‘integrated’ approach to water management, which links: sourcing water (typically abstraction from an aquifer, but also rainwater harvesting and wastewater reclamation); managing demand (e.g. an ambitious target is 85 l/p/d); wastewater treatment (as discussed); discharge of treated wastewater (which can be important for avoiding low flows); and the recharging of groundwater (large strategic sites give rise to an opportunity in respect of careful planning of high quality SuDS).

6.2.98 In this light, there is a need to flag **Kidlington** (North of the Moors) as a smaller site option. Also, it will be important to confirm that there are no issues around wastewater treatment at **Heyford Park**, given the location of the site on a raised plateau between river corridors, and also noting that the existing treatment works for Heyford Park is located within the current proposed development site.

6.2.99 With regards to **Shipton Quarry**, it is notable that the promotional materials reviewed to date includes discussion of ‘foul water drainage’ (i.e. sewer connections), but does not include any discussion of wastewater treatment. With regards to **Wendlebury**, the site promoters explain that *“the outline strategy for the majority of the site is likely to rely on conveying wastewater directly to Bicester Sewage Treatment Works approximately 1.5 km to the north-east of the site. This would be via a new rising main from a terminal pumping station built on the site. The site levels are such that there would be a further two pumping stations in addition to the terminal pumping station.”*

6.2.100 With regards to the **supply of water** (both for homes / businesses and riverine / wetland habitats), this is not likely to be something that has a significant bearing on the choice between LPR growth scenarios, because the issues are sub-regional (and the assumption must be that lower growth in Cherwell would necessitate higher growth elsewhere in Oxfordshire). The Oxfordshire Water Cycle Study concludes:

- *“The Thames Water WRMP demonstrates how the Swindon and Oxfordshire (SWOX) water resource zone has moved into a situation of supply-demand deficit and, without intervention, this will increase as a result of population growth, climate change and sustainability reductions.”*
- *“The WRMP goes on to outline a set of demand management and supply improvement measures to address this. Key to this is development of the Abingdon Reservoir by 2037... although it should be noted that this is currently being evaluated alongside other Strategic Resources Options.”*
- *“The Standard Method and Business-As-Usual household growth forecasts being considered by the Oxfordshire Plan are all at or below the Thames Water forecast. The Transformational rate of growth would be above what Thames Water has planned for; however, this is a long-term plan with opportunity for Thames Water to respond to changing demands. Furthermore, demand for water in the SWOX [zone] is also dependent upon growth in neighbouring planning authorities.”*

6.2.101 In **conclusion**, on the basis of the limited available evidence it is possible only to flag a degree of concern with the higher growth scenarios (also mindful that these two scenarios would see growth at Heyford Park, which could feasibly be associated with challenges from a wastewater management perspective).

6.2.102 With regards to **significant effects**, it is appropriate to predict **moderate or uncertain negative effects** under all scenarios at this stage, ahead of further evidence-gathering, including through consultation with Thames Water and the Environment Agency. As per the discussion presented above, under ‘Transport’, it would be greatly appreciated if stakeholder could provide their views on the reasonable alternative growth scenarios, with a view to ensuring a suitably strategic and proactive approach to water.

Appraisal summary

The table below present a summary of the appraisal of reasonable growth scenarios presented above. Within each row, the aim is to **1)** rank the scenarios in order of performance (with a star indicating best performing); and then **2)** categorise the performance in terms of 'significant effects' using **red / amber / light green / green**.¹⁹

The reasonable growth scenarios – summary appraisal findings

Scenario <i>Constants plus growth / higher growth at...</i>	1	2	3	4	5	6	7	8	9	10	11	12
	Constants only	Wendlebury	Heyford Park	Wendlebury, Heyford Park	Kidlington	Wendlebury, Kidlington	Heyford Park, Kidlington	Wendlebury, Heyford Park, Kidlington	Shipton Quarry	Wendlebury, Shipton Quarry	Heyford Park, Shipton Quarry	Wendlebury, Heyford Park, Shipton Quarry
Topic	Rank of preference and categorisation of effects											
Air quality	2	★	★	★	★	★	★	★	★	★	★	★
Biodiversity	2	★	★	★	★	★	★	★	3	3	3	3
Climate change adaptation	★	2	★	2	★	2	★	2	★	2	★	2
Climate change mitigation	2	★	★	★	2	★	★	★	★	★	★	★
Communities	2	★	★	★	★	★	★	★	★	★	★	★
Economy	3	2	2	★	3	★	★	★	★	★	★	★
Historic environment	★	2	2	2	2	2	2	2	2	2	2	2
Homes	12	10	9	5	11	8	7	4	6	3	2	★
Land	2	2	2	2	2	★	2	2	★	★	2	★
Landscape	2	★	★	2	2	2	2	2	2	2	2	2
Transport	5	3	4	2	3	2	2	2	2	★	2	2
Water	★	★	★	★	★	★	★	★	★	★	2	2

Discussion

An immediate point to note is that **Scenario 1** (lowest growth) is shown to perform relatively poorly in wide ranging respects. The reasons for this are quite clear in terms of socio-economic objectives, but more nuanced in terms of environmental objectives. Specifically, the conclusion reflects a view that Cherwell is not relatively constrained in the sub-regional context, and in the knowledge that lower growth in Cherwell would lead to pressure for higher growth elsewhere.

On the basis of the appraisal matrix there is strong reason to suggest that Scenario 1 performs poorly overall. However, there is a need to apply caution, before reaching any such conclusion. This is because the SA topics cannot be assumed to have equal importance, or 'weight' in the decision making process. It is not the role of SA to assign importance / weight to topics, and so conclude on overall performance. However, were the Council, as decision-makers, to assign particular weight to climate change adaptation, historic environment and water objectives, then Scenario 1 might be seen to perform well overall.

With regards to the other eleven scenarios, the appraisal shows a mixed picture, with all scenarios associated with pros and cons. Focusing on **higher growth scenarios**, these perform well in terms of socio-economic objectives, but give rise to tensions in respect of certain environmental objectives. In particular, higher growth scenarios risk generating conflict with biodiversity, historic environment, landscape and water objectives, but this is dependent on the specific sites involved.

Unsurprisingly, the appraisal does serve to highlight clear arguments for supporting one of the **middle growth scenarios**. For example, Scenarios 7 and 8 perform very similarly, with the only difference being that Scenario 8 performs better in terms of 'homes' (as a higher growth scenario) and worse in terms of 'climate change adaptation' (because the site that would deliver additional growth is subject to flood risk, namely Wendlebury).

Having made these opening remarks, the following bullet points aim to briefly summarise performance of the growth scenarios under each of the topic headings in turn:

- **Air quality** - on the one hand, there are a range of site-specific issues (see discussion below under 'transport'). However, on the other hand, development at all of the sites in question could potentially serve to support the achievement of strategic transport objectives. On balance, it is considered appropriate to only flag a concern with the lowest growth scenario, which would risk pressure for growth at locations elsewhere within a constrained sub-region, potentially at locations where growth would not align well with strategic transport and air quality objectives.
- **Biodiversity** - it is fair to flag a concern with Shipton Quarry (at this relatively early stage, ahead of further detailed work and consultation). The site is closely associated with the River Cherwell corridor (a key strategic asset / priority area), which serves to indicate a degree of sensitivity, albeit also potentially opportunity. There is also a potential concern regarding Wendlebury, on account of the close association of land here with the Upper Ray Meadows broad priority landscape, which is of sub-regional and potentially wider importance; however, concerns are considered quite limited, on the assumption of a fairly modest scheme of ~1,000 homes.
- **Climate change adaptation** - there is a clear need to flag a concern with the option of growth at Wendlebury, albeit through further detailed work it may be possible to identify the potential for strategic growth in this area that does not give rise to a concern, from a flood risk perspective, and there may be the potential to address flood risk affecting the existing village of Wendlebury, leading to a significant betterment / planning gain. There are also question-marks regarding flood risk at Shipton Quarry, which would require further investigation. A further consideration is the possibility of growth at both Heyford Park and Shipton Quarry (Scenarios 11 and 12) enabling or facilitating investment in strategic flood water attenuation / natural flood risk management along the River Cherwell corridor (along with wider enhancements), to the benefit of locations downstream at risk. N.B. the 'amber' score across all scenarios reflects a concern with one of the constant allocations.
- **Climate change mitigation** - the key consideration here is support for directing growth to large strategic sites, which tend to be associated with a built environment decarbonisation opportunity over-and-above smaller sites. However, there is a need for further work to confirm site specific opportunities at all three of the larger strategic sites in question, namely Shipton Quarry (which does have the benefit of being a larger site, and with some potential for a nucleated built form and a good mix of uses onsite), Heyford Park and Wendlebury.

There is no potential to suggest that higher growth is inherently problematic, despite the fact that higher growth would make meeting the *local* net zero ambition (net zero by 2030) more challenging, because climate change is a *global* issue, such that there is a need to focus on per capita emissions.

With regards to significant effects, the conclusion reflects the fact that there are stringent targets and commitments in place, which will prove very challenging to achieve / honour, unless urgent action is taken, and decarbonisation features as a central pillar – indeed *the* central pillar – of the LPR.

- **Communities** - all the variable site options in question are associated with a degree of merit, from a communities perspective, subject to further discussions with the County Council etc. All sites would give rise to certain tensions with existing communities (perhaps least so Kidlington, as a smaller site), and it is not clear that any would deliver specific *strategic* community infrastructure to the benefit of existing communities (e.g. a secondary school); however, it is possible to pinpoint some significant potential for growth to benefit existing communities and so deliver 'planning gain'. In this light, it is difficult to differentiate between the scenarios, beyond highlighting a concern with low growth, which could lead to pressure for more piecemeal growth.
- **Economy** – under all scenarios the assumption is that there would be new employment land allocations sufficient to meet needs, as understood from the HENA (2022). However, it is appropriate to flag a concern with the lower growth scenarios, as economic growth could be constrained and/or there would be risk of an imbalance between employment and housing growth (albeit this is partly a transport matter, given potential for in-commuting). Delivering limited new employment land at Heyford Park, Shipton Quarry and/or Wendlebury is supported, whilst housing growth at Kidlington is supported given close proximity to Oxford.
- **Historic environment** - it is considered appropriate to conclude support for the lowest growth scenario (Scenario 1). This reflects the fact that national designations constrain all of four of the variable sites (albeit three are also potentially associated with heritage-related opportunities).
- **Homes** - it is appropriate to rank the alternatives in order of total growth quantum. Higher growth scenarios would enable a higher housing requirement to be set and/or would enable a larger supply buffer.
- **Land** - it is fair to highlight Heyford Park as likely subject to a degree of constraint, in terms of best and most versatile (BMV) agricultural land. With regards to growth quantum, it is not possible to suggest that lower growth is preferable, as Cherwell does not stand-out as relatively constrained in the sub-regional context.
- **Landscape** – the appraisal is finely balanced, but overall there is judged to be support for Wendlebury and Heyford Park over Kidlington and Shipton Quarry. With regards to growth quantum, it is not clear that there are any in-combination concerns, and it could feasibly be the case that directing growth to both Heyford Park and Shipton Quarry supports targeted investment in enhancements along the River Cherwell / Oxford Canal corridor, as discussed. It would not be appropriate to conclude an inherent concern with higher growth, mindful of constraints affecting the other Oxfordshire authorities (including AONB and the setting of Oxford).
- **Transport** – there is a concern with Scenario 1, as the effect could be problematic in-commuting and/or pressure for growth elsewhere in Oxfordshire, at locations that perform less well in transport terms. It is also appropriate to flag Heyford Park as performing poorly in transport terms, relative to the other three variable sites (albeit there are certain transport-related arguments in favour of further growth). With regards to significant effects, it is appropriate to predict differential significant effects, ranging from significant negative effects to moderate or uncertain positive effects, given the strategic importance of the issues. There is a clear need for proactive strategic planning across Oxfordshire in support of the achievement of transport objectives.
- **Water** - on the basis of the limited available evidence it is possible only to flag a degree of concern with the higher growth scenarios (also mindful that these two scenarios would see growth at Heyford Park, which could feasibly be associated with challenges from a wastewater management perspective).

As a final point, stakeholder organisations are strongly encouraged to comment on the merits of the reasonable alternative growth scenarios, from a perspective of seeking to ensure that the LPR supports the realisation of strategic objectives as far as possible. Such comments would represent a proactive approach to addressing issues of key strategic importance, and could support timely progression of the LPR.

7 The preferred approach

7.1 Introduction

7.1.1 As discussed, it is not the role of the appraisal to arrive at a conclusion on which of the growth scenarios is best, or ‘most sustainable’ overall. Rather, it is the role of the plan-making authority to arrive at that conclusion, informed by the appraisal. This section presents the response of CDC to the appraisal.

7.2 Selecting the preferred scenario

7.2.1 The following statement explains CDC officers’ reasons for supporting **Growth Scenario 7**.

Statement provided by officers in light of the appraisal

7.2.2 Under Growth Scenario 7 the housing supply (1,478 dpa) is sufficient to enable the housing requirement to be set at 1,292 dpa, reflecting 1,009 locally arising need (specifically, the LHN figure identified on the basis of the HENA 2022 and discussions with Oxford City) and 283 dpa unmet need from Oxford City. This proportion of Oxford City’s unmet need is consistent with the projected housing / employment split across Oxfordshire as at 2040 as identified in the HENA (2022).

7.2.3 The appraisal shows Scenario 7 to perform well in a number of respects, with a ranking of “1” under seven topic headings, and positive effects on the baseline predicted under three headings. A number of the key benefits relate to taking a proactive approach to housing and employment land supply, informed by an up-to-date understanding of needs from the HENA (2022), and also a proactive approach to directing growth in such a way that there is support for the achievement of strategic transport objectives.

7.2.4 However, the appraisal also serves to highlight a number of tensions with sustainability objectives, and drawbacks relative to alternative growth scenarios. There is much potential to address the issues and challenges highlighted by the appraisal through policy, both district-wide and site specific.

7.2.5 With regards to the two ‘variable’ site options that are supported under Scenario 7:

- Heyford Park - it is recognised that this is a challenging location for growth from a transport perspective, but the strategy is specifically designed to deliver new transport infrastructure / service upgrades and precludes additional development coming forward before 2030 or without clear mechanisms in place to ensure the necessary infrastructure is forthcoming. The approach will also support improved containment / trip-internalisation in the longer-term. It is acknowledged that this part of the district is relatively constrained in terms of comprising better quality agricultural land; however, it might well be the case (following further investigations), that the land is only grade 3a quality, i.e. the lowest grade of land classed as ‘best and most versatile’. There is also a need for further work in respect of wastewater infrastructure, plus there is a clear need for further close working with Historic England regarding the historic environment / heritage constraint (in respect of the former airfield and more widely).
- Kidlington (North of the Moors) – is within the Oxford Green Belt, but contributes to Green Belt purposes only to a limited extent, and the appraisal is supportive of growth here in terms of a range of sustainability objectives, such that a case can be built for the ‘exceptional circumstances’ necessary to justify Green Belt through a local plan. Heritage is a key constraint, but work completed to date has served to indicate good potential to avoid and suitably mitigate significant adverse effects. There is also a need for more work to confirm access arrangements, and in respect of wider transport connectivity. Finally, it is recognised that, as a smaller site, there may be a lower built environment decarbonisation opportunity in comparison to large-scale strategic growth locations; however, there is a clear need for a mixed portfolio of development sites, as part of the overall LPR supply. Also, the site is considered likely to perform quite well in terms of minimising transport-related greenhouse gas emissions.

7.2.6 With regards to the two variable site options that do *not* feature in Scenario 7, the merits of these options are recognised, e.g. the potential to deliver a new train station at Shipton Quarry, and the potential for growth at Wendlebury to align with strategic transport objectives for Bicester. However, each of these sites is also associated with issues and drawbacks, and it is noted that the appraisal flags concerns with the specific schemes that have been proposed by the site promoters to date. Scenarios involving allocation of one or both of these sites are considered to perform relatively poorly, on balance, but this matter could be revisited prior to plan finalisation, taking account of consultation responses received.

Part 2: What are the appraisal findings at this stage?

8 Introduction to Part 2

- 8.1.1 The aim here is to present an appraisal of the draft plan, as currently published for consultation.
- 8.1.2 In practice, the appraisal builds upon the appraisal of Growth Scenario 7 presented in Section 6. Specifically, the appraisal revisits the appraisal of Growth Scenario 7 with added consideration given to:
- site allocations that are a ‘constant’ across the growth scenarios appraised in Section 6; and
 - draft policies (both borough-wide and site-specific).

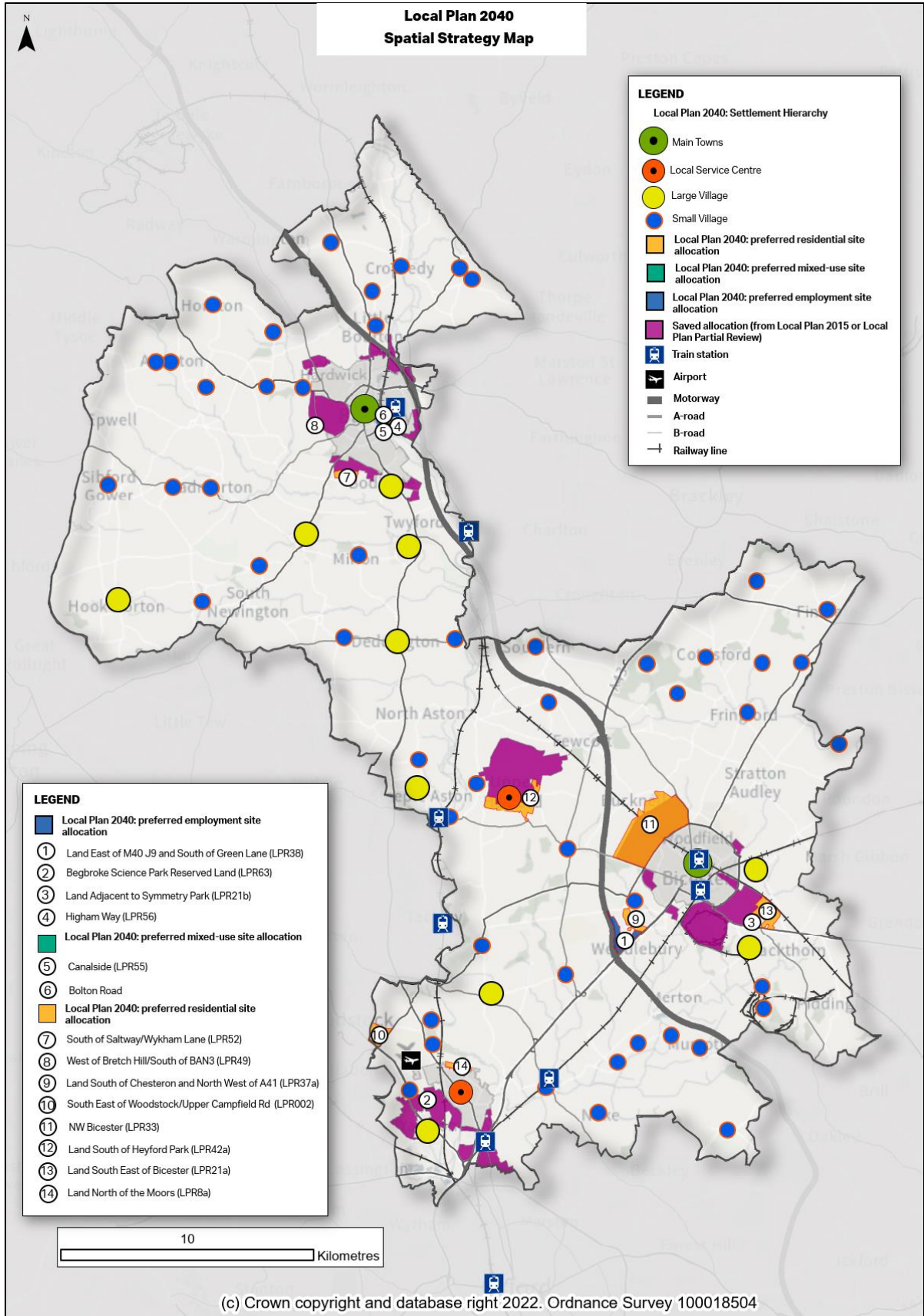
Overview of the plan

- 8.1.3 The plan presents 86 policies under a series of spatial and thematic headings. Policies 1 to 5 deal with key overarching strategic matters, including the spatial strategy, before Policies 6 to 32 deal with each of the district’s individual sub-areas in turn. Policies 33 to 86 then deal with thematic policy issues. Furthermore, the appendices to the plan document present ‘site templates’, which set out the key issues and proposals for each of the site allocations.
- 8.1.4 The appraisal focuses on the spatial strategy / package of proposed allocations / proposed approach to land supply in order to established needs, whilst also considering how other policies will serve to mitigate the impacts of growth and ensure that growth-related opportunities are realised.
- 8.1.5 The spatial strategy is reflected in a key diagram, which is reproduced below as Figure 8.1.

Appraisal methodology

- 8.1.6 Appraisal findings are presented across 12 sections below, with each section dealing with a specific sustainability topic. For each of the sustainability topics in turn, the aim is to discuss the merits of the draft local plan, as a whole, before reaching an overall conclusion on significant effects. Specifically, the regulatory requirement is to “identify, describe and evaluate” significant effects.
- 8.1.7 Conclusions on significant effects are reached on the basis of available evidence and understanding of key issues and opportunities, mindful of the guidance presented within the Schedules 1 and 2 of the SEA Regulations. Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the local plan. The ability to predict effects accurately is also limited by knowledge gaps in respect of the baseline (both now and in the future). In light of this, there is a need to make considerable assumptions regarding how the plan will be implemented ‘on the ground’ and the effect on particular receptors. Assumptions are discussed in the appraisal text where necessary.
- 8.1.8 The appraisal aims to strike a balance between, on the one hand, a need to be systematic with, on the other hand, a need for conciseness and accessibility. The aim is *not* to systematically discuss each and every element of the plan in respect of each element of the SA framework.
- 8.1.9 At this current stage (Regulation 18), there is an emphasis on conciseness, mindful of the concerns raised by the DLUHC Committee (August 2022), who [emphasised](#) a need to: “*streamline the current bureaucracy and overcomplication associated with... assessments.*”
- 8.1.10 Specifically, the intention is to keep each appraisal to circa one page. This approach is undertaken mindful that considerable detail is presented above in respect of reasonable alternatives (Sections 5 and 6), and mindful that there will be the potential to add further detail to the draft plan appraisal at the next stage (Regulation 19), when the local plan and its supporting evidence base will be more fully formulated.

Figure 8.1: The key diagram



9 Appraisal of the draft plan

9.1.1 This section presents an appraisal of the current 'draft plan' consultation document as a whole. The appraisal is presented as a series of narratives under the SA framework (see Section 3).

9.2 Air and wider environmental quality

9.2.1 The following bullet points present a discussion of select key issues / opportunities and potential impacts:

- **Banbury** - is an air pollution hotspot, particularly linked to high levels of traffic to and from M40 J11. As such, the relatively modest level of growth proposed through the LPR is supported. The Transport Assessment (TA, 2022) strongly supports Canalside / Higham Way (e.g. see the summary assessment matrix in the report's executive summary, and Table 5-3 of the report, which presents key conclusions), and the proposal to direct new homes away from the railway line, relative to the previous approach for the two sites, is also supported, from an air / environmental quality perspective.

However, neither of the proposed greenfield allocations are directly linked to a 'green' rated transport corridor (see Figure 5.1 in the TA), and Table 5-3 of the TA points, which presents key conclusions, assigns modest overall transport scores to both sites. Focusing on bus connectivity, the Table 5-3 is quite supportive of the smaller allocation, but for the larger allocation, to the south of Banbury, finds only that the western part of the site has "reasonable" connectivity (where there are heritage sensitivities, as discussed above). The wider context is the new link road between the two radial A-road corridors, along which there might be the potential to support a bus service, plus there is a need to recall that the site is within the 15min cycle radius of Banbury town centre.

- **Bicester** - is also associated with a problematic air quality management area (AQMA). The proposed relatively high growth strategy should assist with funding strategic transport infrastructure upgrades, most notably a southern Bicester link road (which would allow the A41 to be prioritised for public transport and walking/cycling). Neither of the new proposed allocations about the current urban edge, but the TA (2022) is fairly supportive of both sites, ranking them 'mid table' amongst the full suite of proposed allocations (see the table on page iv of the TA). In the case of Chesterton, links to a strategic employment growth location, to the west, are supported; however, an area of land is unavailable to the east, which would ideally be planned for in conjunction with the current proposed allocation, in order to ensure a comprehensive approach to infrastructure delivery alongside new housing (the TA discusses this at paragraph 5.29). In the case of SE Bicester Extension, the overall score of 11 is quite low, but the TA explains that "*A41 bus priority may assist future sustainable transport.*" Also, the current proposal is for the scheme to be separated from the committed scheme by a large local wildlife site, and for the new scheme to be split into two parts, separated by Blackthorn Hill. Whilst this is tentatively supported from a green infrastructure perspective, there will be a need to carefully consider the potential for all weather walking / cycling routes through these green assets, e.g. to reach the local centre to the north.
- **Kidlington** - the two proposed allocations are shown by the TA to be the strongest performing in transport terms other than the two brownfield allocations at Banbury. The site east of Woodstock will be separated from Woodstock by a large area of greenspace, to account for a need to protect a scheduled monument (and further work is needed to identify the most appropriate strategy for primary school provision, ideally within walking distance), but the site is very well-connected to strategic public transport (bus) corridors. Noise pollution from the adjacent A-roads is a constraint, but is explicitly addressed as part of the current planning application. As for the proposed allocation at North of the Moors, Kidlington, the site is not located directly on a strategic public transport corridor, and there is a need to confirm access arrangements, but there will be excellent potential to walk and cycle to key destinations.
- **Heyford Park** - is discussed in detail in Section 6. There are naturally challenges given Heyford Park's location, including in terms of public transport connectivity and problematic traffic through rural villages, but the proposed growth strategy aims to support investment in transport infrastructure, a higher frequency bus service and (potentially, in the long term) higher rates of trip internalisation.
- The **broad strategy** of meeting housing and employment needs, including unmet housing needs from Oxford, is supported, given the alternative of increased pressure for growth at locations outside the district that are potentially less well-connected in transport terms.

- There is also the matter of assuming 500 homes at **non-strategic sites** at larger villages. This approach is supported, as it is thought to strike an appropriate balance (see Section 5.4). Higher growth could risk problematic car dependency / travel, but lower growth could risk village services / facilities. It is also important to note that the TA shows accessibility / connectivity to vary significantly between villages.
- With regards to **development management policy**, the key matter is clarifying expectations of developers in respect of site-level infrastructure delivery and developer contributions towards strategic infrastructure delivery, primarily in terms of transport infrastructure, but also community infrastructure (with a view to supporting trip internalisation and modal shift to walking / cycling). The plan presents many encouraging proposals, but these will need close review prior to plan finalisation, including in discussion with site promoters and stakeholder organisations, and including from a viability perspective.

9.2.2 In conclusion, as per the discussion in Section 6, it is appropriate to predict **neutral effects** at this stage, albeit with some uncertainty. The strategy / proposed package of allocations warrants further scrutiny, and whilst development management policy is supported, there is a need to avoid false comfort, ensuring that a suitably proactive approach is taken to addressing strategic transport objectives through the plan.

9.3 Biodiversity

9.3.1 The following bullet points present a discussion of select key issues / opportunities and potential impacts:

- The approach to growth at **Bicester** warrants being a focus of attention, from a biodiversity perspective, particularly given the sensitive landscape of the Upper Ray Meadows, to the south of the town. In particular, there is a concern regarding the proposed SE Bicester Extension allocation (800 homes), as a large local wildlife site (LWS), comprising lowland meadows priority habitat (linked to a flood risk zone), lies between the committed urban extension and the new proposed allocation. It could be that development supports an enhancement (over-and-above what would occur under a baseline scenario), and an overall biodiversity net gain, but this is unclear at this stage, e.g. noting the likely need for transport infrastructure to pass through the LWS (albeit likely only in the form of an all-weather walking / cycling route). There is also a need to question the strategy of extending beyond Blackthorn Hill, given sensitive landscapes further to the southeast. However, the site promoters vision for a series of linked green spaces is noted (see Figure 6.18). With regards to the Chesterton area, which is proposed for housing and employment growth, the key consideration is a series of flood / surface water flood channels (see Figure 6.5), mindful of a SSSI ~3km downstream, albeit there is limited priority habitat.
- There is also a need to consider the proposal to deliver a higher density scheme within the committed **Northwest Bicester** strategic allocation, with a compensatory increase in delivery of strategic greenspace adjacent to the site, in the form of a new area of parkland between the site and Bucknell, to the north. The implications of this shift for the achievement of biodiversity objectives are not entirely clear at this stage, and could warrant further investigation (e.g. comparative net gain scores).
- At **Banbury** the proposed allocations give rise to relatively limited biodiversity concerns. To the west of the town there is a need to avoid a risk of 'sprawl' beyond the confines of the Cherwell valley into the sensitive valley of the Sor Brook, but the proposed allocation here does not give rise to any significant concerns in this respect, given clear potential to deliver strategic greenspace along its western boundary.
- The proposed allocations at **Kidlington** also give rise to relatively limited biodiversity concerns, given a firm proposal for the site at Kidlington itself (North of the Moors) not to encroach on the River Cherwell corridor, and given an expectation of strategic greenspace at its eastern extent; however, there is a need to confirm whether the proposed primary access point would impact on an area of trees with TPOs. The proposed allocation to the east of Woodstock is also subject to limited constraint, although there are significant tree belts along two sides of the site, which comprise priority habitat. Finally, the proposed extension of Begbroke Science Park is in proximity to a SSSI, but the SSSI is located upstream, and is already strongly associated with existing and committed nearby built form, plus there is a need to recall that the principle of extending the science park is already agreed, following the Partial Review (2020).
- **Heyford Park** gives rise to limited concerns, from a biodiversity perspective, although there is a need to consider the treatment of a tree belt and an adjacent area of woodland. See discussion in Section 6.
- The **broad strategy** of including a focus at larger strategic sites is supported, as such sites can give rise to a particular opportunity in respect of masterplanning with biodiversity in mind, and also supporting investment in offsite interventions in support of strategic objectives. For example, there is the potential for growth at Heyford Park to support strategic investment in the River Cherwell corridor – with a focus on biodiversity and wide-ranging other natural capacity / ecosystem service objectives.

However, it is noted that the three largest allocations will extend existing committed urban extensions (also, the East of Woodstock will extend a site under construction). This serves to highlight the importance of realising opportunities for comprehensive growth, with a view to realising opportunities for infrastructure investment and effective masterplanning, including in support of green / blue infrastructure.

- With regards to **development management policy**, it is again the case that the primary consideration is providing strategic guidance in respect of the expectations on developers, in terms of avoiding areas of sensitivity and delivering enhancements. Early clarity can assist with effective masterplanning, and ensuring green/blue infrastructure feeds into viability calculations alongside wider infrastructure. The current Chesterton site template encourages a focus on green infrastructure along Vendee Drive (to the east), but there is a need to consider a possible alternative focus on blue infrastructure corridors.
- Also, and importantly, **Core Policy 55** (Biodiversity net gain, BNG) sets out to go beyond the statutory minimum requirement (10%), which is strongly supported, from a biodiversity perspective. It is also noted that the plan includes a strong focus on setting out strategic green / blue infrastructure priorities, and so it will be important to consider the circumstances under which developers might fund such schemes in order to generate biodiversity credits, for the purposes of biodiversity net gain calculations.

9.3.2 In conclusion, as per the discussion in Section 6, overall **neutral effects** are predicted. There will be a need to take close account of consultation responses received from key stakeholder organisations, and there is a need for further detailed work ahead of plan finalisation, e.g. for SE Bicester Extension.

9.4 Climate change adaptation

9.4.1 The following bullet points present a discussion of select key issues / opportunities and potential impacts:

- A key issue is the extensive fluvial flood risk affecting **Canalside** at Banbury, which is allocated for a mixed use development, to include 500 homes. The site is protected by a flood protection scheme upstream, but there is naturally a degree of residual risk; also, and importantly, there is a need to review the degree and nature of risk taking into account climate change scenarios, through a Level 2 SFRA.

The site is allocated for 700 homes in the adopted local plan (2015), such that there is an argument to suggest that the new proposal represents an improvement on the baseline situation; however, the existing allocation has proved not to be deliverable, and alternative scheme options, with reduced housing, might feasibly be explored. Also, climate change has come more to the fore since 2015.

Housing-led brownfield regeneration schemes in areas of flood risk are not uncommon nationally, given good potential to mitigate flood risk, including by: avoiding vulnerable uses on the ground floor; measures to ensure safe access / egress; flood resistant design (e.g. to prevent water from entering); and flood resilient design (e.g. to ensure structural integrity is maintained and to facilitate drying / cleaning). However, given climate change concerns, there is nonetheless a need to question the merits of directing new homes to areas that have historically been seen as appropriate for less vulnerable uses.

There is also a need to note that the Government's Planning Practice Guidance on flood risk has recently been updated, including in respect of downstream impacts, for example stating: *"Whilst the use of stilts and voids below buildings may be an appropriate approach to mitigating flood risk to the buildings themselves, such techniques should not normally be relied upon for compensating for any loss of floodplain storage. This is because voids do not allow water to freely flow through them, trash screens get blocked, voids get silted up, they have limited capacity, and it is difficult to stop them being used for storing belongings or other materials."* Downstream flood risk is potentially an issue; however, there is a need to account for the fact that there is already extensive built form across the site, so it could well be that there is the potential to maintain or enhance the current flood storage capacity of the site (which isn't to say that there are not alternative uses that could deliver more flood storage capacity still).

Finally, there is a need to note the proposal to allocate adjacent Higham Way, which is also affected by fluvial flood risk. The proposal is for employment, which is a less vulnerable use, and it is noted that the adopted local plan allocation is for a housing-led scheme, such that it *could* be suggested that the LPR will deliver an improvement on the baseline situation. However, downstream flood risk is potentially more of an issue here, as there is more limited existing built form on the site.

Ultimately, for both sites, there is a need to balance flood risk with the benefits of development, which are significant. These sites clearly benefit from being located in very close proximity to Banbury train station and town centre, and so are supported from a climate change mitigation perspective. Focusing on the proposed Canalside scheme, it will support town centre regeneration and green / blue infrastructure objectives, and a high density scheme might support a fifth generation heat network.

It is also important to note **policy requirements** around detailed flood risk investigations and preparation of a Supplementary Planning Document (SPD). However, there is a need for confidence, at the local plan-making stage, that flood risk can be sufficiently addressed alongside delivery of 500 homes, delivery of employment and the achievement of wider development objectives.

- Elsewhere, there are limited concerns. There is a series of fluvial / surface water flood channels in the **Chesterton** area (see Figure 6.5), and there is a need to be mindful of downstream flood risk affecting Wendlebury, but there will be good potential to integrate flood zones as part of a blue infrastructure strategy, and high quality sustainable drainage systems (SuDS) should serve to ensure no increased downstream flood risk. The other site notably subject to constraint is **SE Bicester Extension**, where there is some surface water flood risk either side of Blackthorn Hill, where new homes are proposed.

9.4.2 In conclusion, as per the discussion in Section 6, taking a precautionary approach at this stage in the process, it is appropriate to predict **moderate or uncertain negative effects**. It will be important to undertake further work to demonstrate that a sequential approach is being taken to avoiding flood risk, working closely with the Environment Agency.

9.5 Climate change mitigation

9.5.1 The following bullet points present a discussion of select key issues / opportunities and potential impacts:

- Focusing on built environment greenhouse gas emissions, as per the discussion in Section 6, and all other things being equal, there can be support for **larger strategic sites** over-and-above smaller sites. This is because such sites can be associated with economies of scale, which can help to make investment on decarbonisation focused interventions more of a viable proposition, and because opportunities can be realised through strategic masterplanning, for example higher density mixed use areas around local centres or transport hubs, which might support a district-scale heat network and/or large scale battery storage facilities distributed through the scheme to balance power supply (typically from rooftop solar) and demand over the course of the day. In this light, there is a degree of support for the proposed strategy, and it is not clear that there is a reasonable alternative strategy that performs better (see Section 6). However, this matter – of exploring growth at scale and/or growth directed to sites where strong viability, in order to realise decarbonisation opportunities – warrants further scrutiny.
- The largest of the proposed allocations is **Heyford Park**. The scale of the scheme should serve to indicate a degree of site-specific built environment decarbonisation opportunity; however, as discussed in Section 6, there is a need for further work to confirm that this is the case in practice. Also, there is a need to consider greenhouse gas emissions from transport, as discussed under other headings. In short, there are both challenges and opportunities (notably a significantly improved bus service).
- The next two largest sites are then at **Banbury** (South of Saltway) and **Bicester** (SE Bicester Extension); however, both schemes are of limited scale (600 homes and 800 homes respectively). N.B. both schemes will extend existing committed strategic urban extensions (see discussion under ‘Biodiversity’).

In the case of SE Bicester Extension, the proposal is for the scheme to be split into two distinct parts, either side of Blackthorn Hill, and the smaller eastern part is proposed to form a ‘linear village’, which underlines the importance of the master planning stage demonstrating how the emerging policies are being fully addressed. There is an understood need for considerable investment in infrastructure (including transport and green infrastructure), and so it will be important to confirm the funds available to direct towards decarbonisation measures. Finally, it is noted that the section entitled “Towards a net zero carbon community” within the submitted vision document (September 2021 – again noting that this pre-dates the emerging plan policies) does not discuss built environment emissions.

- The two proposed allocations at **Kidlington** are smaller, and there is no proposal to deliver a local centre of employment as part of the scheme. However, both sites seem unlikely to be associated with any abnormal development costs, and could generally be associated with strong viability (e.g. noting that house prices are relatively high at Kidlington), which could well be supportive of ensuring houses built to the ‘net zero’ standards. Indeed, this is the proposal as part of the current pending planning application for East of Woodstock site (see Part 6 of the Design and Access Statement, [here](#)). The proposals are considered to be very clear and strong, for example: “*The development will be designed to PassivHaus standards and will achieve... operational carbon down to net zero through onsite energy generation.*” However, the discussion of possible ground source heat pumps is less clear.

N.B. whilst the current planning application is for 500 homes (ref. [22/01715/OUT](#)), officers believe an appropriate capacity could be lower, at ~450 homes, which will have viability implications. Also, it is worth noting that the site has a longer planning history, including a 2014 application for 1,500 homes, plus land for a primary school, across both this site and the site now under construction to the east.

- There is also a need to consider **NW Bicester**, where the current proposal is to support an extended scheme with a higher density built form, leading to an additional 1,000 homes, with a view to supporting viability and ultimately deliverability. NW Bicester has been promoted as an Ecotown for around a decade now, such that the decarbonisation ambition has been subject to considerable scrutiny, and the current 3,100 home Hawkswell Village planning application has not been reviewed in detail as part of this appraisal (see discussion in Section 5.4). However, it may be the case that a higher density built form increases the potential to deliver one or more heat networks, and the proposal to deliver an adjacent small ‘solar farm’ is also noted. This might feed the national grid, making it quite a different proposition (potentially from an energy hierarchy perspective) to rooftop solar directly feeding the development.
- With regards to **development management policy**, the proposed approach is supported, as it appears to suitably push the boundaries of what is likely to be viable (subject to further investigations), reflecting the urgency of the issue (i.e. the 2030 net zero ambition). We make a number of suggestions:
 - Firstly, and most importantly, there will be a need for close scrutiny of the extent to which there is allowance for residual onsite emissions to be offset, recognising that offsetting sits at the bottom of the energy hierarchy, and is inherently associated with risks and uncertainties.
 - Secondly, there is a need to consider whether it might be possible to consolidate the current series of policies into one, with a view to supporting clarity and ease of understanding for the public, given the central importance of this issue (it will be an aspect of the local plan that generates a high degree of interest, and the local plan has an important educational role). The national policy environment is complex and constantly evolving, but [Policy 4](#) of the emerging Stafford Local Plan is tentatively commended (it has not been examined) on account of being very concise, including with a clear focus on: A) space heating demand of less than 15kWh/m²/yr; B) overall energy use of less than 35kWh/m²/yr; C) on-site renewable generation equivalent to onsite use; and D) offsetting only if absolutely necessary.
 - Thirdly, there is a need to consider whether a specific requirement should be set for specific developments, or categories of development (e.g. strategic versus non-strategic), albeit it is recognised that doing so could prove a complex and ultimately challenging exercise.
 - Fourthly, use of the “be clean, be lean, be green, be seen” hierarchy – which is currently quite prominent – should be reviewed. Firstly, the distinction between “be lean” and “be green” is not as clear as might ideally be the case (it perhaps made more sense in the context of the preparing the London Plan, in circa 2017, when combined heat and power was seen as a centrally important technology). Also, whilst “be seen” is a key step (e.g. see London Plan [guidance](#)), it does not appear to feed through into policy.
 - Finally, the supporting text should be reviewed for conciseness and clarity, with a view to clear messaging suited to the task of building public understanding, interest and capacity to engage in respect of the decarbonisation agenda. For example, there is a need to ensure that there is not an undue focus on sequestration, at the expense of avoiding emissions in the first instance, and text might also explain that whilst transport emissions are set to decrease rapidly, due to the national switch-over to EVs, emissions from the built environment risk staying stubbornly high without policy intervention.

9.5.2 In conclusion, the proposed development management policy is strong, which is a key consideration, but there is also a need to maintain a focus on realising decarbonisation opportunities through spatial strategy and site selection. On balance, **neutral effects** are predicted, mindful of the level of decarbonisation ambition necessary if local and national net zero targets are to be achieved.

9.5.3 Moving forward, as well as inputs from stakeholder organisations with an interest in decarbonisation, site promoters are encouraged to submit detailed evidence to demonstrate the potential to viably minimise onsite emissions, ideally to zero carbon. As part of this, it will be important to take account of the latest national precedents, including in respect of definitions of net zero, particularly in terms of “onsite” net zero versus net zero with an allowance for offsetting. There is currently a live debate nationally on this subject, with a focus on the Salt Cross Area Action Plan (AAP), e.g. see [here](#).

Communities

9.5.4 The following bullet points present a discussion of select key issues / opportunities and potential impacts:

- A headline key issue relates to the potential for residents of the proposed **East of Woodstock** allocation to access a primary school, as there would be no potential to deliver one onsite. Further work is needed to identify the most appropriate strategy.

In other respects this site is quite strongly supported, from a 'communities' perspective, particularly as the current the current planning application would involve 67% greenspace within the site (could be higher in practice, as current proposed allocation is for 50 fewer homes than the application). The greenspace will have the effect of separating the new community from Woodstock, but the centre of Woodstock would still be within a reasonable distance (~1.5km).

- The next site for consideration is **SE Bicester Extension**. The proposal here has certain merit, from a 'communities' perspective, particularly in terms of the proposal to increase access to Blackthorn Hill, as a new area of accessible parkland (potentially assisting in terms of building an appreciation of Bicester in its landscape setting, and therefore supporting local 'sense of place'). Also, there could be benefit associated with improved walking/cycling connectivity between Ambrosden and Launton (the current bridleway passes along Blackthorn Hill, but then hits something of a dead-end, in the form of a road with no footpath). However, the furthest point of the proposed site (east of Blackthorn Hill), would be ~3.5km from the centre of Bicester 'as the crow flies', and there are barriers to movement (albeit potential for good bus connectivity). Also, the local centre within the committed adjacent SE Bicester urban extension would be approach 1.5km distant, and there are barriers to movement, in the form of employment land, Blackthorn Hill and a local wildlife site (LWS; in turn, a related consideration is the potential to deliver an all-weather walking / cycling route through the LWS). The distance from the further point of the proposed eastern 'linear village' (according to the site promoter's vision document received in 2021) to the local centre would be considerably further than 1.5km via an all-weather route (i.e. avoiding crossing the hill).
- Another site of note is the proposed 500 home allocation to the south of **Chesterton**, because of the effect on the existing village. It will be important to ensure a comprehensive approach to growth with a view to most fully realising opportunities for new / upgraded community, transport and green / blue infrastructure, with a view to securing 'planning gain', i.e. benefits to the existing community. Perhaps of primary importance is supporting long term aspirations for reimagining the A41 corridor in this area as a public transport and walking / cycling corridor, although the ability to achieve this vision is likely to be largely dependent on the potential to deliver a southern Bicester link road.
- There is also a need to briefly consider the proposal to support an additional 1,000 homes at the existing **NW Bicester** allocation, specifically through a higher density built form in combination with an extension to the existing site to deliver a new area of strategic parkland between the northern edge of the built form and the village of Bucknell. There are clearly arguments in support of the proposed new area of strategic parkland; however, proposals do warrant scrutiny (N.B. there is a current planning application), potentially balancing development viability / deliverability considerations with objectives around ensuring a scheme with a strong green and blue infrastructure network integrated throughout (also a good mix of homes, to include family housing, and good space standards).
- The other proposed allocations raise fewer issues. At **Kidlington**, it is understood that there will be a need for further discussions with the site promoters of 'North of the Moors' in respect of the potential to deliver strategic greenspace (e.g. a village green and/or a sports pitch); also there is a need to confirm the potential for safe and suitable access arrangements, including mindful of TPOs and heritage constraints. The proposed allocation west of **Banbury**, is perhaps not ideal from an access perspective, given access from estate roads, but it is understood that the access arrangements have been found to be satisfactory (there is a current pending planning application), and there is a bus route nearby. Finally, with regards to the allocation south of Banbury, there are no immediate concerns, but there is generally a need to confirm plans for community infrastructure, given extensive nearby committed growth.
- With regards to **Banbury**, there is also a need to note the overall limited growth strategy, given that certain wards are in the 20% most deprived areas in England. However, the focus on Canalside is supported, and it is not clear that there is any alternative strategy that would perform better, from a perspective of supporting regeneration, or otherwise addressing relative deprivation. Also, it is anticipated that town centre regeneration sites will be examined for allocation subsequent to the current consultation. The current consultation document identifies 'Areas of Change', which is supported.

- With regards to **development management policy**, as per discussion above, the key matter is clarifying expectations of developers in respect of site-level infrastructure delivery and developer contributions towards strategic infrastructure delivery. The plan presents many encouraging proposals, but these will need close review prior to plan finalisation, including from a viability perspective.

A wide range of other proposed development management policies are broadly supportive of communities objectives, and some will warrant further scrutiny prior to plan finalisation (potentially to include detailed examination through a viability study) to ensure that they will be most effective in practice, in terms of addressing development-related issues and realising opportunities.

- 9.5.5 In conclusion, at the current time there is considered to be a need for further work regarding site specific policy, and to confirm arrangements for ensuring suitable access to community infrastructure. As such, **neutral effects** are predicted. However, at the next stage, in light of further work (also accounting for consultation responses received), it will likely be possible to predict positive effects on the baseline (which, it is important to recall, is one whereby the lack of a local plan leads to problematic unplanned growth).

9.6 Economy and employment

- 9.6.1 The following bullet points present a discussion of select key issues / opportunities and potential impacts:

- As discussed in Box 5.2, the proposed employment **allocations** total 69 ha, specifically:
 - Higham Way – strongly supported, as brownfield and close to Banbury town centre and train station;
 - Canalside – as per Higham way; contains a considerable element of existing employment land, so there is a degree of uncertainty regarding the net increase in employment land;
 - Land East of M40 J9 and South of Green Lane – will extend the committed (resolution to approve) Siemens Healthineers strategic site, as discussed in Section 5.4, ensuring a comprehensive approach to employment land in this area, and supporting a wider vision for the A41 corridor west of Banbury.
 - Land Adjacent to Symmetry Park, North of A41, South East Bicester – will extend the employment land that was recently delivered as the first phase of the committed SE Bicester strategic urban extension (N.B. its rapid delivery serves as evidence for the high demand for employment land in this area).
 - Begbroke Science Park – land was safeguarded through the Partial Review (2020).
- The effect of the allocations will be to secure a ~15 ha **supply** buffer, over-and-above the midpoint **need** figure identified through the HENA (2022), namely 225 ha, assuming that committed sites come forward as anticipated, and assuming that an additional ~15 ha is identified from non-strategic sites subsequent to the current consultation. This supply buffer is potentially appropriate, but will need to be kept under close review. There is also the potential to question the assumptions underpinning the need figure; however, the analysis presented within the HENA is ultimately considered to be robust, including as it is undertaken for Oxfordshire as a whole (a key functional geography), builds upon the analysis presented within the Cherwell Economic Needs Assessment (2021) and was developed in an iterative fashion over a number of months, with the close involvement of officers from Cherwell and Oxford City Council.
- Aside from meeting the headline total quantitative need figure, there is also a need to consider the needs of **specific sectors**, with the HENA focusing attention on the following four: office; R&D; industry; and warehousing. There is a need for further work to confirm the situation, but it is understood that four of the five proposed employment land allocations are 'flexible', in that the sites could be suited to supporting more than one of the sectors listed above. It is only Begbroke Science Park that is allocated with a clear expectation of delivering new employment land within a specific sector, namely R&D.
- Also, there is a need to account for **wider objectives**, e.g. relating to regeneration / place-making and locally arising needs. In this respect, there is a need to consider an established need to diversify the employment land offer at Bicester, ensuring that it builds a reputation as a central hub in the context of the Ox Cam Arc, albeit it also has an important role to play in terms of warehousing / distribution, given its excellent road transport connectivity.
- Linked to this, there is an established need to ensure a diverse employment land supply offer by allocating new **smaller employment sites**, both at higher order settlements (less so Kidlington, perhaps most notably at Bicester) and in the rural area. This will assist with ensuring economic resilience.
- A further consideration is supporting **housing growth** in locations well linked to strategic employment hubs, which is a notable reason in support of growth in the Kidlington sub-area, also noting the proximity of Kidlington to Oxford. Similarly, a higher housing growth strategy at Bicester could be supportive of investment in strategic road infrastructure, which in turn could support the town's economic role.

- Finally, with regards to **Heyford Park**, whilst it is not anticipated that the 1,235 home extension would directly deliver any new employment land, it may be supportive of long term aspirations for sensitive development / redevelopment / refurbishment / repurposing of buildings within the airfield conservation area, including with a focus on employment floorspace, as discussed in detail within Section 6.
- With regards to **development management policy**, a range of policies are supportive of ‘economy and employment’ objectives, including those that deal with assigning policy protection to employment land. Core Policy 22: London-Oxford Airport is of note, as the airport plays an important economic role.

9.6.2 In conclusion, the draft LPR reflects the outcomes of detailed analysis in respect of housing and employment land needs (HENA, 2022), including with a view to responding to projected economic growth (which is significant) and balancing new homes and jobs (to avoid commuting). There is a need for further work in respect of smaller sites, but it is fair to predict **moderate or uncertain positive effects**.

9.7 Historic environment

9.7.1 The following bullet points present a discussion of select key issues / opportunities and potential impacts:

- All the proposed housing **allocations** are subject to a degree of constraint, but there are not thought to be any concerns regarding in-combination impacts. The following reflects a broad order of concern:
 - North of the Moors, Kidlington – is discussed in detail in Section 6. It is significantly constrained by its proximity to the Kidlington Conservation Area and its prominent Grade I parish church, but there is good potential to avoid or suitably mitigate effects, particularly through an extensive greenspace buffer.
 - East of Woodstock – is constrained on account of its proximity to Blenheim Palace World Heritage Site. However, the land in question is not thought likely to contribute significantly to setting of the Palace or its associated landscaped parklands, including mindful of the influence of road infrastructure in the area, plus there is as a small intervening patch of woodland. The firm proposal is to concentrate development in the northeast corner of the site, so as to avoid and suitably buffer a scheduled monument (also a wider area of archaeological interest), which also serves to reduce concerns regarding Blenheim Palace. The scheduled monument is a below ground feature, but a current planning application identifies the potential to enhance appreciation through public art.
 - South of Chesterton – is near adjacent to the Chesterton Conservation Area, which extends to the southern extent of the village. However, the proposed allocation comprises the western part of site LPR37, as discussed in Section 5, whilst it is the eastern part that is seemingly the more constrained. Also, the southern extent of the conservation area mainly comprises open space / parkland, with the village’s historic core located slightly further to the north. More generally, there is a need to note that a Roman Road (Akeman Street) passed through Chesterton, between Cirencester and Aylesbury (this could indicate the likelihood of archaeology). However, there would be good potential to mitigate historic environment impacts through masterplanning, plus it is noted that a 63 homes scheme has recently been delivered at the southern extent of the village. Finally, there is a need to consider that development would coalesce Chesterton and the small hamlet of Little Chesterton, which has a modest degree of historic character, with most of buildings visible on pre-1914 OS map, and given an association with a network of historic lanes, footpaths and field boundaries / streams / drainage channels; however, the Landscape Study (2022) does not raise any such concerns.
 - Heyford Park – warrants being placed within the middle of this list, as there is a degree of uncertainty, at this stage, regarding historic environment / heritage concerns, ahead of consultation with Historic England. There are a range of issues (also potentially opportunities), perhaps most notably in respect of the RAF Heyford Conservation Area. Matters are discussed in detail in Section 6.
 - South of Banbury Extension – is associated with land that gently descends to the south, towards the valley of the Sor Brook, which is valued historic landscape. However, the potential to utilise Wykham Lane as a defensible boundary means that there are few concerns regarding long-term ‘creep’. A Grade II listed farmhouse adjacent to the east, a cluster of listed buildings at Wykham Farm to the south west, and another historic farm is adjacent to the south (shown on the pre-1914 OS map; now offering a farm shop). Also, the Bodicote Conservation Area is to the east (where Wykham Lane meets the high street), plus there are a number of popular footpaths in the vicinity. However, there will not be road access to Wykham Lane, and there is good potential to deliver greenspace as mitigation.
 - Southeast Bicester Extension – Blackthorn Hill is associated with a Grade II listed windmill (and also a second windmill); however, the proposal is to enhance access to Blackthorn Hill, and the potential for enhanced appreciation of the listed windmill can be envisaged (see Figure 5.18).

- Canalside – this is a historic industrial area, with a range of Victorian industrial buildings, mixed with more modern industrial buildings, and there is one Grade II listed building (the Old Town Hall).
- West of Banbury – there is an adjacent Grade II listed farmhouse, but clear potential to deliver a significant landscape buffer, noting topographical / landscape constraints, as discussed below.
- With regards to **development management policy**, it is again the case that the primary consideration is providing strategic guidance in respect of the expectations on developers, in terms of avoiding historic environment / heritage impacts, and realising any opportunities. Also, the wider suite of proposed thematic development management policies is proposed supportive of historic environment objectives.

9.7.2 In conclusion, there are a range of sensitivities and potential development related issues / impacts, but emerging site specific policy serves to demonstrate good potential to avoid or suitable mitigate impacts, and there will be the potential to further refine and strengthen policy through further work, including in light of advice provided by Historic England. As such, **moderate or uncertain negative effects** are predicted.

9.8 Homes

9.8.1 The following bullet points present a discussion of select key issues / opportunities and potential impacts:

- The key proposal is to set the housing **requirement** at 1,292 dwellings per annum (dpa) and to identify a supply totalling 1,488 dpa, such that the supply buffer (i.e. the difference between supply and the requirement, as a contingency against delivery issues) would be ~14%. It is naturally the case that issues can arise at the planning application stage that impact local plan delivery trajectories.
- The 1,292 dpa figure is identified on the basis of evidence from the HENA – specifically the local housing need (**LHN**) figures that it recommends for Cherwell District and Oxford City (see discussion in Section 5.2) – and a proposal to accommodate 32.8 % of Oxford City's **unmet needs** in Cherwell District.

As set out in the HENA, and as discussed in Section 5.2, there are alternative LHN scenarios for consideration, but ultimately there is strong support for the preferred scenario.

With regards to the proportion of Oxford City's unmet needs set to be accommodated in Cherwell, there is again a strong evidential basis for the proposed approach (relating to assumed distribution of employment in 2040), and it is noted that the proposal is to provide for significantly more than Cherwell's arguable 'fair share' of 25%. On this basis, there are no reasonable arguments for taking a higher proportion. With regards to taking a lower proportion, this would increase pressure on the local plan reviews for the other three Oxfordshire districts, which are at an earlier stage of preparation, such that there is currently uncertainty regarding their capacity to accommodate unmet needs. Lower growth scenarios are explored in Section 6, and found to perform poorly in a number of respects.

- With regards to the size of the **supply buffer**, a 14% supply buffer is considered robust, given elements of the proposed supply associated with uncertainty (e.g. the assumed 500 homes from non-strategic sites to be identified subsequent to the current consultation) and some questions relating to delivery.

There is no reason to suggest a need for a *higher supply buffer* at this stage, but this is a detailed matter that will naturally need to be kept under close review.

With regards to the possibility of a *lower supply buffer*, there is a need for caution as the effect could be to increase the likelihood that the district faces supply issues (i.e. loss of a five year housing land supply, as measured against the committed housing requirement, or poor performance against the Housing Delivery Test), and so is subject to the presumption in favour of sustainable development, leading to housing coming forward at unallocated sites, which will often be sub-optimal in terms of planning and sustainable development objectives. This has been an issue for the district over recent years, with a number of significant housing developments at villages gaining permission at appeal, despite being refused by the Council for clear planning reasons, under the presumption in favour of sustainable development (which, in practice, leads to a 'tilted balance' in favour of granting planning permission so as to correct the district's poor housing land supply position).

- The next matter to consider is whether the proposed housing supply is suitably weighted towards locations that are well-suited to providing for Oxford City's **unmet needs**. The proposed strategy is supported, particularly given the level of growth at Bicester, which is well connected to Oxford via short and frequent rail journeys. It is important to recall that the majority of the unmet need is already planned for at sites around Kidlington, which are 'saved' by the emerging plan.

- **Affordable housing** needs is another matter that relates to spatial strategy, as well as to development management policy, as there can be an argument for setting the housing requirement above LHN, in order to meet affordable housing needs more fully, and there is a need to direct housing towards sites with strong development viability, as far as possible, in order to support affordable housing delivery. The proposal is to require 30% affordable housing across the district, in accordance with the viability study, which goes some way to meeting the affordable housing need in full (see discussion in Section 6).

It will be important to further scrutinise the spatial strategy, prior to plan finalisation, from an affordable housing needs perspective. Equally, there will be a need to explore 'whole plan viability', specifically the balance between setting requirements of developers, in terms of the funds that must be directed to affordable housing and other policy asks (e.g. decarbonisation, space standards, accessibility standards, biodiversity net gain), and ensuring deliverable housing sites.

A final matter for consideration here is meeting **specialist accommodation** needs. In particular, meeting the needs of Travelling Communities (Gypsies and Travellers, and also Travelling Showpeople) is a key issue nationally. The implications of not meeting Traveller accommodation needs are wide ranging. For Travellers, poor accommodation can be a barrier to maintaining the traditional way of life, can lead to tensions with settled communities and certainly contributes to issues of relative deprivation, with Travellers tending to have poor outcomes in terms of health and wellbeing, educational attainment and a range of other indicators. Friends, Families and Travellers (FFT) is a national organisation focused on the needs of Travellers. FFT present a [vision for change](#) under four headings: Health, Hate, Accommodation and Education. FFT also collates publications, research etc, for example:

- No place to stop: Research on the five year supply of deliverable Gypsy and Traveller sites in the South East of England (2020), which found: *“Only 8 local authorities, out of 68... in the South East of England, had identified a 5 year supply of specific deliverable sites for Gypsies and Travellers.”*
- An overview of unmet need for pitches on Traveller sites in England (2021): *“Only 13 permanent sites and five transit sites with any available pitches... in all of England.”*
- How to tackle health inequalities in Gypsy, Roma and Traveller communities (date unknown) – notably reports the findings of a 2019 Parliamentary Women and Equalities Committee inquiry on “Tackling inequalities faced by Gypsy, Roma and Traveller communities”. The committee chairperson found:²¹
“Gypsy Roma and Traveller people have been comprehensively failed by policy makers and public services for far too long... the Government must stop filing this under 'too difficult' and set out how it intends to improve health, education and other outcomes for these very marginalised communities who are all too often “out of sight and out of mind...”

As well as setting development management policy to guide planning applications, there will be a need to allocate land for pitches / plots to meet identified needs as far as possible.

As part of the 'site selection' process, there is typically a need to consider broad strategy options, for example exploring questions around such matters as: the merits of new sites versus intensification and/or expansion of existing sites; the appropriate size of sites; whether it is appropriate to deliver new sites as part of strategic housing-led developments; the extent to which needs should be met in close proximity to where they arise from; and whether certain sites can be associated with delivery risk (e.g. sites within strategic development locations). There is also inevitably a need to explore the distinction between the needs of those who meet the Planning Policy for Traveller Sites (PPTS) definition, versus those who do not, mindful of latest precedents. The first step is to complete an assessment of needs.

The current consultation document explains that a Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (GTAA) will be undertaken subsequent to the current consultation, and so it could transpire that there is a need for further work to allocate one or more sites, and it is noted that there is also a need to consider the accommodation needs of boat dwellers. Core Policy 83 (Travelling Communities) suggests that sites should be within 3km of town or village, but there can be good potential to deliver suitable sites in closer proximity, i.e. within walking distance of services and facilities. By way of an example, Surrey Heath Borough recently consulted on a preferred approach involving four allocations, of which three were much closer than 3km to a service village, and the one relatively isolated site was proposed for a very specific reason, namely an extension to a Travelling Showpeople site. There could also be a need to consider the possibility of delivering pitches within new strategic allocations (either housing-led or employment), although this can lead to a delivery risk.

²¹ See <https://committees.parliament.uk/committee/328/women-and-equalities-committee/news/102045/gypsy-roma-and-traveller-communities-comprehensively-failed-by-policy-makers/>

- 9.8.2 In conclusion, the draft LPR reflects the outcomes of detailed analysis in respect of locally arising housing needs (HENA, 2022), including with a view to meeting demographic needs, easing affordability pressures and balancing new homes and jobs. Furthermore, and importantly, the proposal is to take a proactive approach to providing for Oxford City's unmet needs, which is strongly supported from a 'housing' perspective. There is every chance of being able to predict significant positive effects ahead of plan finalisation, in light of further evidence and understanding around matters such as the appropriate supply buffer, meeting affordable needs (informed by viability work) and meeting Traveller accommodation needs; however, at this stage it is considered appropriate to predict **moderate or uncertain positive effects**.

9.9 Land, soils and resources

- 9.9.1 The following bullet points present a discussion of select key issues / opportunities and potential impacts:

- Supporting housing growth at **Canalside**, as well as an intensification of employment uses, is clearly supported, in terms of making the best use of brownfield land so as to reduce pressure on greenfield.
- In this respect, the proposed change to the **NW Bicester** strategic allocation is of note. On the one hand, there is potentially support for higher density development. However, on the other hand, the implication is the need to allocate productive agricultural land (south of Bucknell) for greenspace.
- Both of the proposed greenfield allocations at **Banbury** are rare examples of sites that has been surveyed in order to establish agricultural land quality with confidence. At both sites, the land is found to comprise Grade 2 quality land, i.e. land that comfortably falls within the bracket of 'best and most versatile' (BMV; which the NPPF defines as land that is Grade 1, Grade 2 or Grade 3a quality). With regards to the proposed allocation to the west of the town, the field in question is quite small, given the recent loss of the northern part of the field to development, which potentially serves to reduce concerns. With regards to the proposed allocation to the south, it is noted that the land in question comprises notably higher quality agricultural land than is the case for the committed site to the north. This presumably reflects the association of the new proposed allocation with the valley of the Sor Brook.
- At **Bicester** there is overall lower agricultural land quality, particularly to the south and southeast of the town. None of the proposed allocations have been surveyed in detail, but are quite unlikely to comprise BMV land, on the basis of the nationally available provisional (i.e. low resolution and low accuracy) dataset, and going by land that has been surveyed in detail around the town (which finds there to be extensive Grade 3b quality land). With regards to the proposed allocation to the southeast of the town, it is noted that adjacent committed site to the west has been surveyed in detail and found to comprise Grade 3b quality land, but that the nationally available dataset shows a band of better quality (provisionally Grade 2 quality) land associated with Blackthorn Hill.
- At **Kidlington** none of the surrounding land is shown (by the dataset available at magic.gov.uk) to have been surveyed in detail, which is perhaps surprising given the extent of committed allocations following the Partial Review (2020). However, with regards to the proposed allocation east of Woodstock, the adjacent committed site has been surveyed in detail and found to comprise Grade 3b quality land. The nationally available provisional dataset serves to suggest that both of the proposed allocations comprise 'Grade 3' quality land, which in practice may or may not be land that is BMV (N.B. the nationally available dataset does not distinguish between Grades 3a and 3b). At Kidlington there is perhaps also a need to question whether the effect of allocation will be to affect the potential for productive use of the remaining agricultural fields to the north, between the proposed allocation and the river corridor; however, it might be that there are no significant concerns in this respect.
- At **Heyford Park** – it is similarly the case that none of the land surrounding the airfield has been surveyed in detail, which is surprising given that Heyford Park has been identified as a strategic growth location / option for a number of years. The nationally available provision dataset shows the land in this area to be primarily Grade 3, but there is also some Grade 2 quality land in the vicinity, which could potentially intersect with the eastern extent of the proposed allocation (recalling that the dataset is low resolution).

A further consideration is the need to avoid sterilisation of minerals resources that could potentially be viably extracted, with Heyford Park intersecting a Minerals Safeguarding Area, as understood from the [policies map](#) of the Oxfordshire Minerals and Waste Local Plan (2017). However, as discussed in Section 6, this may not serve as a significant constraint in practice (to be confirmed).

- With regards to **development management policy**, Core Policy 42 (Renewable Energy) is of note, which identifies the need to avoid loss of BMV agricultural land as a key criterion when considering planning applications for new solar farms. In this respect, there is a need to consider that there is quite notable broad variation in agricultural land quality across the district, although areas of lower quality agricultural land can tend to be associated with sensitivities in other respects, e.g. biodiversity.

9.9.2 In conclusion, the plan inevitably needs to release significant areas of greenfield land that is currently in productive use for agriculture, reflecting the need to identify a supply of 'deliverable' and 'developable' sites for the plan period as a whole (NPPF paragraph 68), as understood from the Housing and Economic Land Availability Assessment (HELAA). The district is not highly constrained in terms of agricultural land quality, and the proposed lower growth strategy for Banbury is noted, but overall there will likely be a significant loss of BMV land, and so there is a need to predict **moderate or uncertain negative effects**.

9.10 Landscape

9.10.1 The following bullet points present a discussion of select key issues / opportunities and potential impacts:

- **Landscape sensitivity** assessment has been a key input to site selection, as discussed in Section 5.4.
- At **Banbury**, there is quite a high prevalence of landscape sensitivity around the settlement edge (see the 'points of the compass' discussion in Section 5.4), but efforts have clearly been made to direct growth away from the most sensitive areas. In particular, the proposed allocation to the west of the town has relatively limited landscape sensitivity (on the assumption of a strong landscape buffer at its western extent, to avoid concerns regarding further development creep to the west, which would risk the town 'spilling' into the valley of the Sor Brook). The landscape study assigns 'low-moderate' sensitivity to this site and also the larger proposed allocation to the south of the town; however, the latter site is notably associated with the valley of the Sor Brook. Furthermore, it will extend an existing committed scheme, which currently is set to be quite well-contained at its southern boundary by a tree belt; however, there is considered to be landscape capacity for a further southern extension, taking the urban extension to the next logical boundary to the south, namely Wykham Lane. Given that Wykham Lane will form a strong defensible boundary, here are few concerns regarding long-term development creep.
- **Bicester** is generally associated with lower landscape sensitivity, but there is significant variation around the perimeter of the town, including mindful of key viewpoints including higher ground, main roads, rural lanes and footpaths. The proposed extension to the existing NW Bicester allocation is broadly supported, from a landscape perspective, as the effect will be to secure a long term defensible landscape gap between Bicester and the village of Bucknell. Also, there are fairly limited sensitivities associated with land to the south of Chesterton, with the Landscape Study (2022) assigning 'low-medium' sensitivity. However, the proposed allocation to the southeast of Bicester is associated with some notably landscape sensitivities, given relationship to the settlement edge and Blackthorn Hill. The landscape study assigns 'medium-high' sensitivity, such that this is one of the two most sensitive Bicester landscape parcels. There will be good potential to masterplan and design the scheme so as to minimise landscape impacts, and it is recognised that there are also potentially opportunities associated with increasing access to Blackthorn Hill (where there is a historic windmill, and from where it may be possible to gain some appreciation of Bicester in its landscape setting), but there is clearly a degree of inherent constraint.
- At **Kidlington** the two proposed allocations are not covered by the Landscape Study (2022), but have been examined by studies completed in the past, specifically to inform the Partial Review (2020). Overall, both sites are considered to have relatively limited landscape sensitivity, as relatively flat sites benefiting from quite strong landscape containment. The site to the east of Woodstock is quite well-contained in landscape terms, in that it is bounded to the west by the Woodstock urban edge (a site under construction) and by roads on the other sides (along with thick hedgerows / tree belts). Also, the proposal is to deliver a very significant amount of new strategic greenspace within the site. With regards to the site to the north of Kidlington, the potential to achieve a new defensible Green Belt boundary is obviously a key consideration, which has been considered in detail and will undoubtedly be given further consideration ahead of plan finalisation. Heritage constraint to development here has been discussed above, including views of the Grade I listed (and highly prominent) parish church from footpaths that pass through and adjacent to the site. There is also some slightly raised land within west of the site.
- With regards to **Heyford Park**, the Landscape Study (2022) assigns low-medium sensitivity, but there are a number of inherent issues, given a raised plateau landscape. A key issue is the landscape gap to the Lower Heyford Road, as discussed in Section 6.

- Finally, with regards to the **employment allocations**, there can be inherent landscape sensitivities; however, both of the primary allocations – namely the two at Bicester – are closely associated with major road corridors. Also, the largest of the proposed allocations would extend a recently committed site.
- With regards to **development management policy**, an important question is in respect of the degree to which masterplanning parameters are set through the local plan, including with a view to providing confidence that landscape impacts will be minimised, versus allowing flexibility for masterplanning at the planning application stage, with a view to avoiding delivery issues. As a minimum, it is expected that areas for strategic greenspace within site boundaries will be identified, as per the Partial Review (2020).

9.10.2 In conclusion, as per the conclusion in Section 6, it is considered appropriate to predict **neutral effects**. A number of the sites are associated with landscape sensitivity, and the proposed release of Green Belt is noted, but the lower growth strategy for Banbury is supported, as is the overall proactive approach to meeting development needs, given that Cherwell is located within a constrained sub-region.

9.11 Transport

9.11.1 The following bullet points present a discussion of select key issues / opportunities and potential impacts:

N.B. please also see discussion in earlier sections, including Air quality.

- Beginning with the matter of **broad strategy**, the discussion in Section 6 sets out broad support for the preferred growth scenario (Scenario 7), as there is generally good alignment with strategic transport objectives. In particular, it sets out broad support for a strategy whereby objectively assessed development needs are proactively met through local plans, as well as support for a strategy that includes a strong focus on directing new homes to strategic development sites. Supporting growth at Bicester over-and-above Banbury is supported, for the reasons set out above under the ‘air quality’ heading, and there is also support for the two Kidlington allocations, from a transport perspective. Heyford Park is less well-connected in transport terms, but a key aim of further growth is to secure improvements to transport infrastructure and bus services. Also, as discussed in detail above, the effect of growth could be to support achievement of a long term vision for Heyford Park as a service village with a strong degree of self-containment.
- Further **site specific comments** are as follows:
 - West of Banbury – the proposed allocation to the west is located between strategic transport corridors, but there is a bus route nearby. Road access will be via estate roads, but is understood to be adequate.
 - South of Banbury – will extend an existing committed strategic allocation, which had been masterplanned to ensure good access to a distributor road and a local centre. The western part of the site links to a main road corridor and has “reasonable bus connectivity”, according to the Transport Assessment (2022), but this part of the site may need to be delivered as greenspace.
 - South of Chesterton – is very well located on a strategic transport corridor, but a key issue will be securing good walking and cycling connectivity to Bicester town centre and rail station.
 - Southeast of Bicester – is well located on the A41, but there are challenges in respect of accessing Bicester town centre (including due to a problematic EWR level crossing) and accessing Oxford / the M40, in the absence of a southern Bicester link road. There is also the need for further work to confirm walking / cycling connectivity from southern extent of the site to a local centre and Bicester town centre.
 - North of Kidlington – this site is broadly supported, from a transport perspective, but there is a need to confirm the potential for good road access from the Moors.
- With regards to **development management policy**, this is clearly something that is a considerable focus of the current consultation document. Just taking Banbury as an example, core policies deal with “delivery of strategic transport schemes”, “safeguarding land for strategic transport schemes” and “development in the vicinity of Banbury Rail Station”, whilst there is a development management policy dealing specifically with the matter of “Banbury Inner Relief Road and Hennef Way”.

9.11.2 In conclusion, as per the discussion in Section 6, it is possible to predict **moderate or uncertain positive effects** on the baseline, recalling that the baseline situation is one whereby there is problematic unplanned growth in Cherwell and elsewhere within a sub-region where aligning growth with strategic transport objectives is of paramount importance. Given the clear focus of thematic core / development management policies on transport it may be possible to upgrade this conclusion ahead of plan finalisation. It will also be important to take account of detailed transport modelling, which will inform plan finalisation.

9.12 Water

- 9.12.1 With regards to the **spatial strategy** / package of proposed allocations, there is little potential to comment further, over-and-above the discussion presented in Section 6. There are no clear reasons to suggest any significant concerns, in respect of water resources or water quality, but there is a need to gather further evidence, including through consultation with the Environment Agency and the water company.
- 9.12.2 With regards to thematic core / **development management policy**, the current consultation document explains: *“In considering development proposals, the Council will use Core Policy 45 together with Core Policy 43: Sustainable Flood Risk Management and Core Policy 44: Sustainable Drainage Systems (SuDS) to reduce the impact of development on the water environment, maintain water quality, ensure adequate water resources and promote sustainability in water use.”*
- 9.12.3 In conclusion, as per the discussion in Section 6, it is appropriate to predict **moderate or uncertain negative effects** at this stage, ahead of further evidence-gathering.

9.13 Overall conclusions

- 9.13.1 The appraisal predicts mixed effects (as is typically the case with local plans). In summary:
- Positive effects on the baseline (which, it is important to recall, involves a situation whereby development continues to come forward, including possibly at speculative sites) are predicted under several topic headings; however, effects are ‘moderate or uncertain’, given certain identified issues/tensions and, in some cases, a need for further work subsequent to this current consultation / prior to plan finalisation.
 - However, under several other topic headings there is a degree of tension between the local plan and sustainability objectives, potentially to the extent that the local plan could result in a negative effect on the baseline (even recognising that the baseline situation is one whereby there are unmet housing needs across the sub-region and/or development comes forward in a less-well-planned manner). In all cases there will be potential to address tensions, and revise the appraisal conclusion, ahead of plan finalisation.
- 9.13.2 The following bullet points set out the range of predicted effects using a red/amber/green categorisation:²²
- **Moderate or uncertain positive effects**
 - Economy and employment – the draft LPR reflects detailed analysis of housing and employment land needs, as set out in the HENA (2022), including with a view to responding to projected economic growth (which is significant) and balancing new homes and jobs (to minimise commuting). There is a need for further work in respect of smaller sites, but there is overall strong support for the draft LPR.
 - Homes – the draft LPR reflects the outcomes of detailed analysis in respect of locally arising housing needs (HENA, 2022), including with a view to meeting demographic needs, easing affordability pressures and balancing new homes and jobs. Furthermore, and importantly, the proposal is to take a proactive approach to providing for Oxford City’s unmet needs. There is every chance of being able to predict significant positive effects ahead of plan finalisation, in light of further evidence and improved understanding around matters such as: the appropriate supply buffer; meeting affordable needs (informed by viability work); and meeting Traveller accommodation needs.
 - Transport – the proactive approach to meeting objectively assessed needs is strongly supported, given Cherwell’s location within a sub-region where the need for growth to align with strategic transport objectives is of key importance. Achievement of transport objectives, including opportunities to secure new and upgraded strategic transport infrastructure, is a clear focus of proposed thematic core / development management policies within the plan, including within the sub-area specific sections. However, certain of the proposed allocations give rise to a degree of tension with transport objectives.
 - **Neutral effects**
 - Air quality – the strategy / proposed package of allocations warrants further scrutiny, and whilst development management policy is supported, there is a need to avoid false comfort, ensuring that a suitably proactive approach is taken to addressing strategic transport objectives through the plan. One key issue relates to the question of whether growth at Bicester will help to deliver a southern link road.

²² **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. **No colour** indicates a neutral effect.

- Biodiversity – the proposed allocation to the southeast of Bicester is subject to a notable constraint, including due to a large adjacent local wildlife site. However, there could also be the potential to realise opportunities through growth, such that there is an overall biodiversity net gain (as measured at an appropriate landscape scale). The proposed requirement for 20% net gain is supported.
 - Climate change mitigation – the proposed development management policy is strong, which is a key consideration, but there is also a need to maintain a focus on realising decarbonisation opportunities through spatial strategy and site selection. On balance, neutral effects are predicted, mindful of the level of decarbonisation ambition necessary if local and national net zero targets are to be achieved.
 - Communities – at the current time there is considered to be a need for further work regarding site specific policy, and to confirm arrangements for ensuring suitable access to community infrastructure. As such, neutral effects are predicted. However, at the next stage, in light of further work (also accounting for consultation responses received), it will likely be possible to predict positive effects. On key issue is resolving the matter of access to a primary school from the east of Woodstock allocation.
 - Landscape – a number of the sites are associated with landscape sensitivity, and the proposed release of Green Belt is also noted (although Green Belt is not a landscape designation). However, the lower growth strategy for Banbury is supported, as is the overall proactive approach to meeting development needs, given that Cherwell is located within a constrained sub-region.
- **Moderate or uncertain negative effects**
 - Climate change adaptation – the proposed allocation at Canalside is notably affected by flood risk (with a need for further investigations through a detailed assessment), but is supported in wide-ranging other respects, and there will be good potential to avoid and mitigate flood risk through masterplanning and design. There will be a need for further close working with the Environment Agency.
 - Historic environment – there are a range of sensitivities and potential development related issues / impacts; indeed, the majority of proposed allocations are subject to a notable or significant degree of constraint. However, there should be good potential to avoid or suitable mitigate impacts through further work, including in light of advice provided by Historic England.
 - Land and soils – the plan inevitably needs to release significant areas of greenfield land that is currently in productive use for agriculture, reflecting the need to identify a supply of 'deliverable' and 'developable' sites for the plan period as a whole (NPPF paragraph 68), as understood from the Housing and Economic Land Availability Assessment (HELAA). The district is not highly constrained in terms of agricultural land quality, and the proposed lower growth strategy for Banbury (where higher quality land is more widespread) is noted, but overall there will likely be a significant loss of BMV .
 - Water – there are no clear reasons to suggest any significant concerns, in respect of water resources or water quality, but there is a need to gather further evidence, ahead of plan finalisation.

Cumulative effects

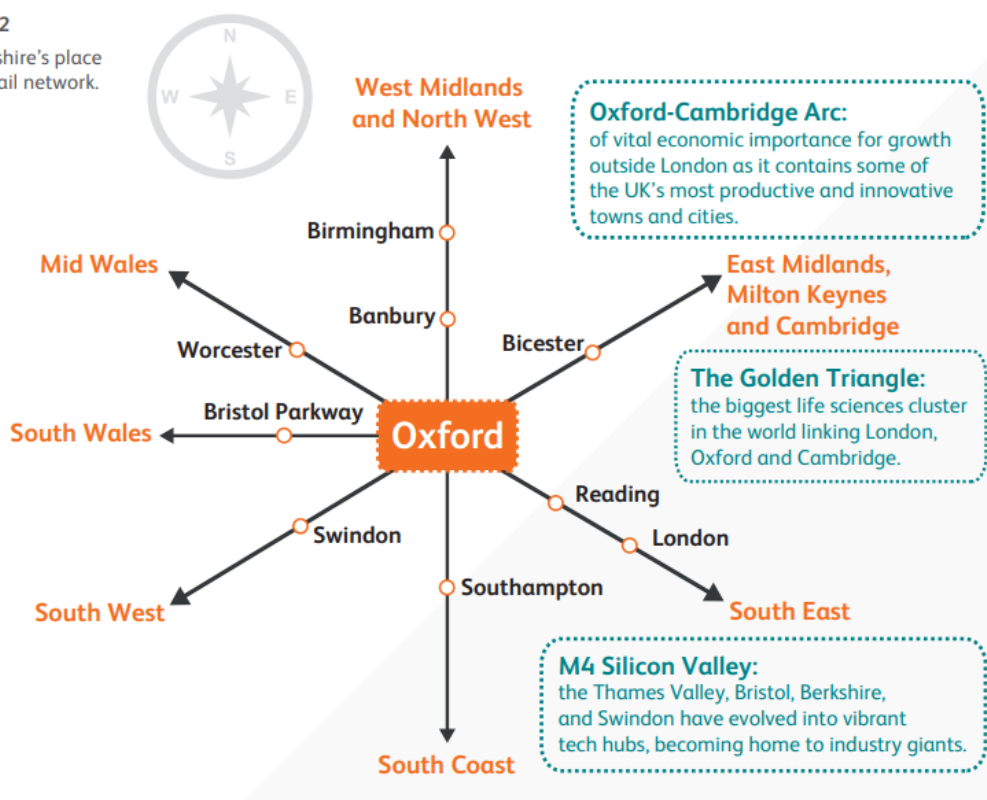
9.13.3 The SEA Regulations, which underpin the SA process, indicate that stand-alone consideration should be given to 'cumulative effects', i.e. effects of the local plan in combination with other plans, programmes and projects that can be reasonably foreseen. In practice, this is an opportunity to discuss potential long term and 'larger than local' effects. The following bullet points cover some key considerations:

- **Housing needs** – this is a primary larger than local consideration, with all local plans needing to consider known, likely or potential unmet needs from within their housing market area (albeit these are often not clearly defined). The draft LPR takes a proactive approach to providing for Oxford's unmet needs.
- **The economy** – there is a need to ensure that employment land is provided in line with regional and national objectives. In this light, the LPR focus on supporting strategic employment growth at Bicester is supported, as well as employment (and housing) growth at Kidlington, as both settlements fall within with Oxfordshire Knowledge Spine and the Ox Cam Arc. There is pressure for further warehousing floorspace at Banbury, but this is resisted on balance, noting that such uses are relatively footloose. Further considerations are: A) the sub-regional value of Oxford City Airport (e.g. supporting Silverstone); and B) the need to not foreclose or unduly prejudice options for a possible Strategic Rail Freight Interchange east of Heyford Park (<https://oxsrfi.co.uk>), albeit the proposal is only at the scoping stage.

- **Transport corridors** – many of the key strategic opportunities around growth facilitating new or upgraded strategic transport infrastructure are ‘local’, rather than cross-boundary, e.g. aspirations for the A41 corridor at Bicester, and improved sustainable transport connectivity at Upper Heyford. However, there are also a range of cross-border considerations, e.g. bus services linking growth locations to Oxford, and A44 corridor considerations in respect of growth at Woodstock.
- **Oxford Meadows SAC** – the possibility of in-combination impacts is a focus of a stand-alone Habitats Regulations Assessment (HRA), the conclusion reached that there are no significant concerns.
- **Landscape scale nature recovery** – this is a key larger than local consideration, with a particular need to focus attention on: A) the River Cherwell / Oxford Canal corridor; and B) the Upper Ray Meadows (which link to the Bernwood Forest). Both broad landscapes are of Ox-Cam wide, and hence arguably national, significance. Strategic growth associated with, or nearby to, these broad landscapes could lead to funds being directed towards the realisation of strategic ambitions. A Local Nature Recovery Strategy (LNRS) is forthcoming, under the Environment Act 2021, but steps must be taken in the interim.
- **Green Belt** – there is a need to maintain the integrity of the Oxford Green Belt. In this respect, the key point to note is that the proposed Green Belt allocation makes only ‘moderate’ contribution to purposes.
- **Decarbonisation** – ‘Bicester Eco-town’ has been discussed nationally for at least a decade. In turn, there is a strong argument for a national exemplar strategy. One matter for consideration could be the possibility of seeking to deliver a sub-regional modern methods of construction (MMC) facility.
- **Agricultural land** – self-sufficiency of food projection is increasingly a key national consideration.
- **Water** – is a larger than local consideration. A ‘Phase 1’ Oxfordshire [study](#) was completed in 2021.

Figure 9.1: Oxford in the sub-regional context, from the Oxfordshire ORCS, 2021

Figure 2
Oxfordshire's place in the rail network.



Part 3: What are the next steps?

10 Plan finalisation

Publication of the Local Plan

- 10.1.1 Subsequent to the current consultation it is the intention to prepare the proposed submission version of the local plan for publication in-line with Regulation 19 of the Local Planning Regulations 2012. This will be a version that the Council believes is 'sound' and intends to submit for Examination. Preparation of the Proposed Submission ('Publication') Local Plan will be informed by the findings of this Interim SA Report, responses to the current consultation, further evidence gathering and further appraisal work.
- 10.1.2 The SA Report will be published alongside the Proposed Submission ('Publication') Local Plan. It will provide all the information required by the SEA Regulations 2004.

Submission, examination and adoption

- 10.1.3 Once the period for representations on the Publication Local Plan / SA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed 'sound'. If this is the case, the plan will be submitted for Examination, alongside a summary of the main issues raised during the consultation. The Council will also submit the SA Report.
- 10.1.4 At Examination, the Inspector will consider representations (alongside the SA Report) before then either reporting back on soundness or identifying the need for modifications. If the Inspector identifies the need for modifications to the Local Plan, these will be prepared (alongside SA if necessary) and then subjected to consultation (with an SA Report Addendum published alongside if necessary).
- 10.1.5 Once found to be 'sound' the Local Plan can be adopted by the Council. At that time a 'Statement' must be published that sets out certain information including 'the measures decided concerning monitoring'.

11 Monitoring

- 11.1.1 There is an increased focus on monitoring nationally, in light of the proposal to reform plan-making to ensuring a clearer focus on achieving clear 'outcomes'.
- 11.1.2 At the current time, in-light of the appraisal findings presented in Part 2 (i.e. predicted effects and uncertainties), it is suggested that monitoring efforts might focus on:
- Agricultural land – it is possible to monitor loss of agricultural land by grade.
 - Biodiversity – the new net gain regime presents an opportunity for innovative monitoring.
 - Climate change adaptation – potentially monitor housing in close proximity to a fluvial flood zone (in addition to intersecting); also the 1 in 30 year surface water flood zone.
 - Climate change mitigation – it could be appropriate to monitor the proportion of new homes linked to a heat network and or a decentralised ('smart') power network; also the proportion of homes delivered to standards of sustainable design and construction that exceed building regulations. More generally, there is a need to carefully consider how local plan monitoring links to monitoring of borough-wide emissions.
 - Development creep – new permitted sites adjacent to committed or recent schemes could be monitored.
 - Employment land requirements – will require close monitoring, given evolving regional and national context. In particular, the needs of the warehousing / distribution sector are subject to change.
 - Housing – the Council already monitors numerous housing delivery related matters through the Authority Monitoring Report, and indicators should be kept under review. There could be an argument for monitoring affordable housing delivery by district sub-area / viability zone. Regular monitoring of the accommodation needs of travelling communities is also important, with the last assessment in 2017.
 - Transport – consideration should be given to innovative methods of monitoring the uptake of 'sustainable transport' modes within new communities, plus there is a need for ongoing monitoring of traffic hotspots.
 - Water – ongoing consideration should be given to any risk of capacity breaches at Wastewater Treatment Works (WwTWs) and other risks to the status of water courses.

Appendix I: Regulatory requirements

As discussed in Section 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report. However, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2, whilst Table B explains this interpretation. Table C then presents a discussion of more precisely how the information in this report reflects the requirements.

Table A: Questions answered by the SA Report, in-line with an interpretation of regulatory requirements

		Questions answered	As per regulations... the SA Report must include...
Introduction	What's the plan seeking to achieve?		<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the SA scope?	What's the sustainability 'context'?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What's the sustainability 'baseline'?	<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan 	
Part 2	What are the SA findings at this current stage?	<ul style="list-style-type: none"> The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan 	
Part 3	What happens next?	<ul style="list-style-type: none"> A description of the monitoring measures envisaged 	

Table B: Interpreting Schedule 2 and linking the interpretation to our report structure

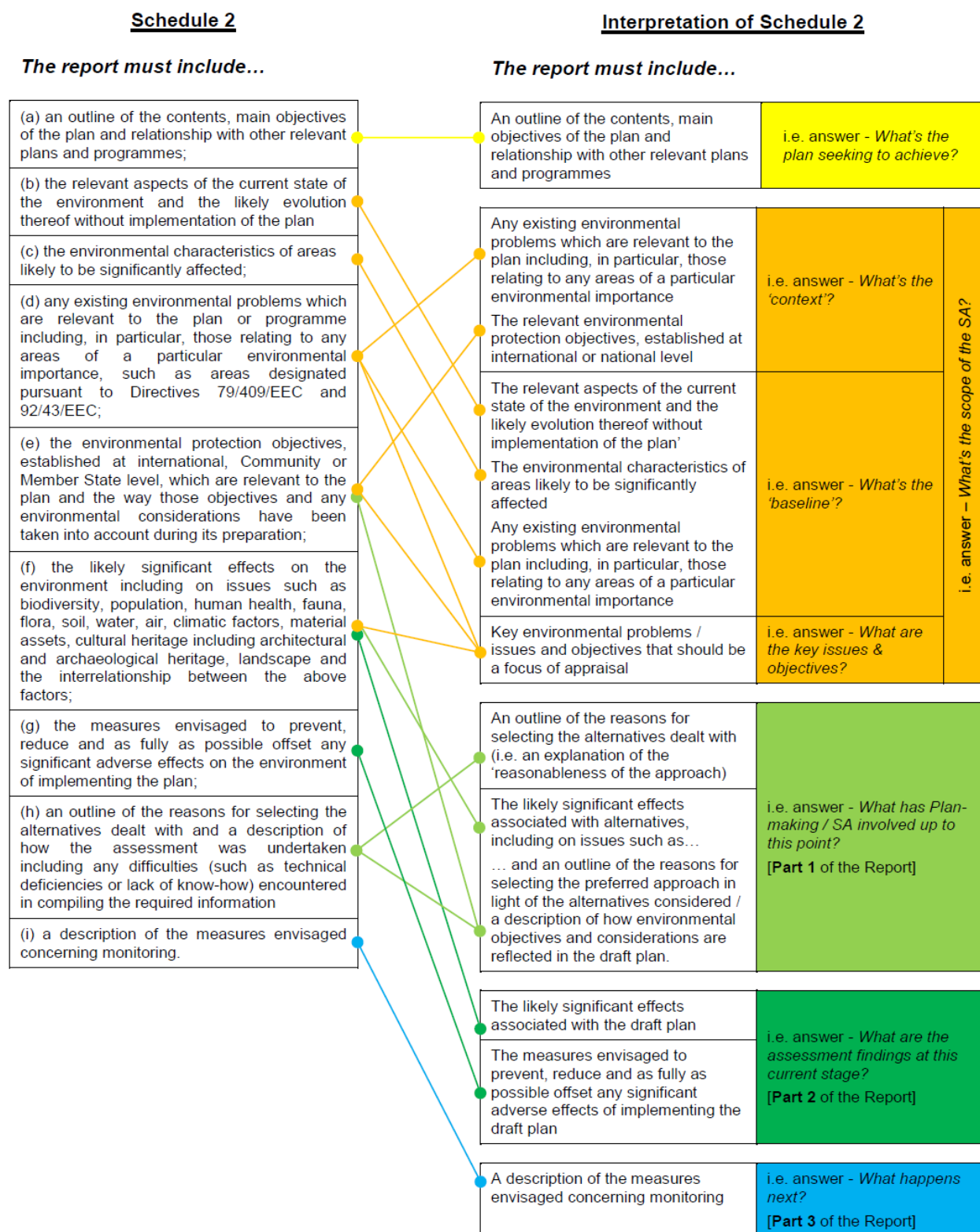


Table C: 'Checklist' of how and where (within this report) regulatory requirements are reflected.

Regulatory requirement	Information presented in this report
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 ('What's the plan seeking to achieve') presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report. The outcome of scoping was an 'SA framework', which is presented within Section 3 in an adjusted form.
c) The environmental characteristics of areas likely to be significantly affected;	
d) ... environmental problems which are relevant... ...areas of a particular environmental importance...;	
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The Scoping Report presented a detailed context review and explained how key messages from this (and baseline review) were then refined in order to establish an 'SA framework', which is presented within Section 3. With regards to explaining " <i>how... considerations have been taken into account</i> ", Section 7 explains 'reasons for supporting the preferred approach', i.e. how/why the preferred approach is justified in-light of alternatives appraisal.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Section 6 presents alternatives appraisal findings in respect of reasonable growth scenarios, whilst Section 9 presents an appraisal of the local plan as a whole. All appraisal work naturally involved giving consideration to the SA scope and the potential for various effect characteristics/dimensions.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Section 9 presents recommendations.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 4 and 5 deal with 'reasons for selecting the alternatives dealt with', with an explanation of reasons for focusing on growth scenarios / certain growth scenarios. Section 7 explains 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of the alternatives (growth scenarios) appraisal. Methodology is discussed at various places, ahead of presenting appraisal findings.
i) ... measures envisaged concerning monitoring;	Section 11 presents this information.
j) a non-technical summary... under the above headings	The NTS is a separate document.
The SA Report must be published alongside the draft plan, in-line with the following regulations	
Authorities... and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	This Interim SA Report is published alongside a draft version of the plan in order to inform consultation and plan finalisation.
The SA Report must be taken into account, alongside consultation responses, when finalising the plan.	
The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	This Interim SA Report will be taken into account when finalising the plan for publication (as discussed in Section 10).