

Proposed Main Modifications
Partial Review of the Cherwell Local Plan 2011-2031 Part 1:
Oxford's Unmet Housing Need

Explanatory Note

November 2019

1. Background

- 1.1. The Council submitted the Partial Review of the Cherwell Local Plan (Oxford's Unmet Housing Need) to the Secretary of State for Housing, Communities and Local Government for formal Examination on Monday 5 March 2018. The Council submitted the Proposed Submission Local Plan (July 2017) accompanied by Focused Changes and Minor Modifications (February 2018). The Submission Policies Map was included within the documents.
- 1.2. A Preliminary Hearing took place on 28 September 2018. Main Hearings were held between 5 and 13 February 2019.
- 1.3. The Inspector requested that following the Hearings the Council submit a Transport Technical Note (CD HEAR 1) and a Housing Figures Note (CD HEAR 2). The two notes, together with Statements of Common Ground and other documents submitted at the time of the Hearings were the subject of an informal consultation ending on 4 April 2019. The Council was provided with an opportunity to respond to the submissions received by the Inspector.
- 1.4. In June/July 2019 Cherwell Development Watch Alliance, Kidlington Parish Council and Begbroke Parish Council wrote to the Inspector enquiring about the potential implications of the examination of the submitted Oxford City Local Plan. The Council responded to the correspondence and wrote to the Inspector regarding the Inspector's report on the examination of the Vale of White Horse Local Plan (CDC letters to Inspector 20/6/19, 27/6/19, 4/7/19).

2. Inspector's post hearings advice note

- 2.1. The Inspector's Post-Hearings Advice Note (Document PC5) was received on 13 July 2019. In the Note the Inspector confirmed his preliminary conclusions that:
 - the 4,400 dwellings figure that represents Cherwell's apportionment of Oxford's unmet housing need provides a sound basis for the Plan;
 - the approach of locating the housing and infrastructure required as close as possible to Oxford, along the A44 and A4165 transport corridors, is an appropriate strategy;

- the pressing need to provide homes, including affordable homes, to meet the needs of Oxford, that cannot be met within the boundaries of the city, in a way that minimises travel distances, and best provides transport choices other than the private car, provide the exceptional circumstances necessary to justify alterations to Green Belt boundaries;
- on density, whilst some additional capacity may be possible, the Council has struck a broadly sensible balance between the extent of land proposed to be removed from the Green Belt, and the need to accommodate development that respects its context; and
- in transport terms, the principle of siting the required allocations along an established transport corridor is a sound one.

2.2. The Inspector also advised that, with the exception of site PR10 (land South East of Woodstock), he considers the site allocations and the process by which they have been arrived at as being sound in principle. However, his note contains detailed points in relation to some of the proposed allocations which are referred to in more detail below.

2.3. The Inspector indicated that the major change required to make the Plan sound is the deletion of Policy PR10, Land South East of Woodstock, stating:

“I do not believe that the impact on the setting, and thereby the significance, of the nearby Blenheim Palace World Heritage Site (WHS) would be unacceptable, considered in isolation. However, notwithstanding the potential for screen planting, it is my view that the development of the site for housing would represent an incongruous extension into the countryside that would cause significant harm to the setting of Woodstock, and the character and appearance of the area. That, alongside the travel distance to Oxford (which is likely to tempt residents away from more sustainable travel choices like public transport or cycling notwithstanding the proximity of the site to a proposed Park & Ride facility), and the impact on the setting and significance of the WHS, lead me to the conclusion that the allocation is unsound.”

2.4. It is therefore necessary for the Council to consider how it could make provision for 410 dwellings elsewhere and to respond to the Inspector’s invitation to propose Main Modifications to address this. Whilst not precluding other approaches, the Inspector suggested ways in which this could be addressed:

“1. There could be scope to divide the 410¹ dwellings around some of the other allocations, without having any undue impact on the character and appearance of the general area;

¹ The Inspector’s references to housing numbers (410) for Site Policy PR10 and other comments in his advice note (Document PC5) indicate that the Proposed Submission Plan July 2017 is the base Plan for the preparation of Main Modifications. The higher figure of 500 at site PR10 was advanced in the original Focused Changes (February 2018 and subject to Further Focused Changes as presented in a Statement of Common Ground with Historic England (SOCG5A)). These changes are now superseded.

2. That could be combined with additional dwellings on the Policy PR9 allocation which could lead to a better-designed layout (see above); or

3. There may be the possibility that the Policy PR6c – Land at Frieze Farm allocation could accommodate some housing (and possibly the link road) as well as any replacement golf course. However, this would necessitate further land-take from the Green Belt for which exceptional circumstances would need to be demonstrated. This might prove difficult to justify unless options 1 and 2 above and any other options outside the Green Belt were shown to be unsuitable.”

2.5. In preparing its response, the Council has been cognisant that the alternative of Land to the South East of Woodstock, i.e. maintaining the PR10 allocation in some form, needs to be taken into account.

3. Approach to main modifications

3.1. The identification of modifications has been an iterative process of testing informed by the following:

- i. the Inspector’s Post-Hearings Advice Note;
- ii. existing evidence;
- iii. changes in circumstances / new information;
- iv. engagement with site promoters and cooperation with partners;
- v. new evidence including Sustainability Appraisal.

4. Main modifications

4.1. The Council has prepared two schedules of modifications: first, a schedule of Main Modifications which the Council is consulting upon; and second, for completeness, a schedule of Minor Modifications which are a matter for the Council.

4.2. The Main Modifications and Minor Modifications alter the Plan as originally proposed in July 2017. They supersede the Focused Changes and Minor Modifications published in February 2018 and other Further Focused Changes and Further Minor Modifications previously suggested by the Council; for example those in Statements of Common Ground. The Council has brought forward all modifications it is seeking. The Main Modifications suggested since receipt of the Inspector’s Advice Note are highlighted grey in the schedule. In summary the key Main Modifications proposed by the Council are as follows:

Table 1:

Site	Number of dwellings in Submission Local Plan July 2017	Number of dwellings in Main Modifications September 2019	Net change
PR6a	650	690	+40
PR6b	530	670	+140

PR7a	230	430	+200
PR7b	100	120	+20
PR8	1950	1950	No change
PR9	530	540	+10
PR10	410	0 (deleted)	-410
Total	4400	4400	0

5. Process for preparing main modifications

5.1. The process for preparing modifications has involved the following stages:

1. internal review of plan/existing evidence base in the context of the Inspector's advice;
2. scope of significant changes in circumstances / new information;
3. identification of reasonable options;
4. formation of initial working assumptions for testing;
5. engagement with promoters;
6. evidence testing and technical engagement;
7. formation of proposed modifications and further testing;
8. completion of sustainability appraisal and consideration of conclusions;
9. consideration of exceptional circumstances for additional Green Belt alterations;
10. consideration of deliverability and implementation;
11. further engagement and finalisation of modifications.

6. Initial review of plan and existing evidence base

6.1. Officers examined the Plan and its evidence to consider whether there were any significant changes in circumstances and any 'tolerances' within the Plan's proposals and evidence having regard to the Inspector's observations. Initial findings included:

- i. the Council's approach to housing figures was 'broadly sensible' (CD HEAR2 and the Inspector's advice note). Whilst it was necessary to consider the redistribution of 410 homes, recommencing work on housing figures from 'scratch' was not necessary in the interest of soundness. It was necessary to look for tolerances, changes in circumstances and any new evidence;
- ii. prior to submission (February 2018) the County Council had advised that a smaller primary school was required at site PR6a (land east of Oxford Road) than originally envisaged but that this had come too late in the plan-making process to factor in to site capacity work (i.e. taking account of a 'freed-up' one hectare of land);
- iii. The Green Belt Study (CD PR40h, Appendix 1 pp 251 and 252, site PR178) indicated that the release of the field immediately to the south of that already proposed in the submission plan would have the same impact on the harm to the Green Belt as the proposed site. There may therefore be more scope, if shown to be exceptionally

required, to extend the development area for site PR7a (land south east of Kidlington) in a southerly direction, notwithstanding the Council's original objective of maximising the remaining gap between new development and development to the south of the A34;

- iv. The Green Belt Study (CD PR40e, Appendix 1, pp145 and 146, site PR49) indicated that the release of the field immediately to the south of that already proposed in the submission plan would have the same impact on the harm to the Green Belt as the proposed site. There may therefore be more scope, if shown to be exceptionally required, to extend the development area at site PR7b (land at Stratfield Farm), notwithstanding the Council's environmental objectives;
- v. that delivery of additional homes at site PR8 (land east of the A44) was unlikely to be achievable by 2031.

6.2. The review highlighted that Focused Changes previously put forward by the Council would need to be screened to determine which needed to be brought forward as Main (and minor) Modifications.

7. Scoping of changes in circumstances / new information

7.1. The key changes in circumstances comprised:

- i. the Inspector's advice;
- ii. additional information on the significance of trees for site PR6b (land west of Oxford Road) arising from consideration by the Council's landscape adviser (CD PR110 Figure 2, CD PR124)
- iii. additional information on highway constraints for site PR7b (land at Stratfield Farm) arising from discussions with the County Council as Highway Authority (CD PR112);
- iv. hybrid application (ref 18/02065/OUTFUL) for planning permission submitted to Oxford City Council for development at 'Northern Gateway' (now referred to as Oxford North). The outline proposals comprise employment (up to 87,300 m2 B1 space), community space, commercial space (up to 2,500 m2 A1-A5 uses), a 180 bedroom hotel, up to 480 residential units and a link road between A40 and A44 through the site. The full application proposals include 15,850 m2 of B1 employment space, access junctions from the A40 and A44 and construction of a link road between the A40 and A44. At the time of writing this note, the application was recommended by officers for approval pending decision by Planning Committee on 24th of September 2019.

8. Consideration of Reasonable Options

8.1. The Council's consideration of reasonable site options for preparation of the original Plan is set out in section 9 of the Sustainability Appraisal (SA) (CD PR43d). Section 10 of the SA sets

out the key reasons for selecting the sites proposed in the Plan, and the key reasons for rejecting other sites within the areas of search. The Inspector has not raised any concerns with the SA in his advice note.

- 8.2. The Inspector considers that the 4,400 homes proposed provides a sound basis for the Plan. His preliminary findings indicate the approach of locating the housing and infrastructure required as close as possible to Oxford, along the A44 and A4165 transport corridors is an appropriate strategy. All site options in Areas of Search A and B, (those areas in closest proximity to Oxford), were assessed in the SA. The sites selected for inclusion in the Plan were considered to be the most suitable for meeting the Plan’s vision and objectives and achieving sustainable development.
- 8.3. The Inspector considers that there are exceptional circumstances necessary to justify alterations to Green Belt boundaries.
- 8.4. The Inspector has advised, *‘With one exception...I regard the various allocations, and the process by which they have been arrived at, as sound, in principle...’*. The site that the Inspector has concerns with (PR10 – land south east of Woodstock) is the only site that the Council originally proposed which is situated outside of the Oxford Green Belt.
- 8.5. Other than that site, the Council has no reason to question its site selection.
- 8.6. The Council has been aware that should it not be possible to accommodate the displaced development requirements within the Plan’s original scope, there would be a need to consider other options.
- 8.7. The options considered by the Council in preparing Main Modifications are set out in the Council’s SA Reports sections 7, 9 and 10 of the SA (CD PR43) and section 01 of the new SA Addendum (CD PR113).
- 8.8. The Council’s consideration of the options has been intrinsically linked to the sequential consideration of options required to avoid unnecessary further alteration to Green Belt boundaries and, if required, the demonstration of exceptional circumstances for further alteration.
- 8.9. The Council considered first, whether there were options outside of the Green Belt; second whether there were options requiring no additional Green Belt release; and third, in the light of the conclusions on the first and second considerations, whether there were options within the scope of the existing strategy that would acceptably and exceptionally permit further revision of Green Belt boundaries. The options considered are presented in Table 2.

Table 2: Options Considered

Options outside of the Green Belt	Options requiring no additional Green Belt release	Options within the scope of the existing strategy requiring additional Green Belt release
1) Site PR10 – Land South East of Woodstock	2) Site PR3(a) - Proposed Safeguarded Land (southern extension of site PR8)	13) Site PR6a – Land east of Oxford Road (eastwards extension into Green Belt)
	3) Site PR3(b) – Land between site PR8 and the railway (minor eastward extension of site PR8)	14) Site PR6c – Land at Frieze Farm (new housing proposal within the Green Belt i.e. with Golf Course)
	4) Site PR3(c) – Land to the south of the A34 to the west of site PR6b (westward extension of site PR6b)	15) Site PR7a – South East Kidlington (southern extension of residential area into Green Belt)
	5) Site PR3(d) – Oxford Parkway Railway Station and Water Eaton Park and Ride (northward extension of PR6a)	16) Site PR7b – Stratfield Farm (potential western/southern extension of residential area into Green Belt)
	6) Site PR3(e) – Land north, east and west of Begbroke Science Park (northward extension of residential area into land reserved for employment)	17) Site PR8 – Land east of the A44 (eastern extension of residential area into Green Belt to the east of the railway)
	7) Site PR6a – Land East of Oxford Road – intensification of developable area	18) Site PR9 – Land to the west of the A44 (western extension of residential area into Green Belt)
	8) Site PR6b - Land West of Oxford Road – intensification of developable area	
	9) Site PR7a – South East Kidlington – intensification of developable area	
	10) Site PR7b – Stratfield Farm – intensification of developable area	
	11) Site PR8 – Land to east of the A44 – intensification of developable area	
	12) Site PR9 Land West of Yarnton – Intensification of developable area	

8.10. The Council's overall conclusions are presented below.

Options outside of the Green Belt

8.11 Evidence previously submitted and examined by the Inspector explained that there are no potentially suitable options available outside of the Green Belt other than the land comprising site PR10. The Areas of Search considered are set out in section 7 of the SA (CD PR43).

Option 1: Site PR10 – Land South East of Woodstock

8.12. The Council's evidence supporting the submitted plan considered the site to be a reasonable one to consider. Further, it was selected for policy development. The Council's original conclusion on site selection for site PR10 is recorded in the Sustainability Appraisal (CD PR43d, para's 10.23 to 10.36). It was concluded, "*The Council considers that the site should be taken forward for residential development albeit with the need to restrict the residential development area*". Additionally, it was originally concluded that the effects of development would be acceptable, and that development would contribute to the achievement of sustainable development (CD PR43 Section 10). The site was the only one identified as being appropriate outside the Oxford Green Belt.

8.10. Having reviewed all written and oral evidence, the Inspector has provided a planning judgement that allocation of the site would not be sound. He has made it clear that he does not believe "*...that the impact on the setting, and thereby the significance, of the nearby Blenheim Palace World Heritage Site (WHS) would be unacceptable, considered in isolation.*"

8.11. But, notwithstanding the potential for screen planting, his view is that '*...the development of the site for housing would represent an incongruous extension into the countryside that would cause significant harm to the setting of Woodstock, and the character and appearance of the area....*'.

8.12. This planning judgement, with the Inspector's additional concerns about travel distance to Oxford and the setting and significance of the World Heritage Site (also following the consideration of evidence), now weighs heavily in the Council considerations.

8.13. The Council presented the Inspector with an alternative proposal for site PR10 to which Historic England had no objection. The Inspector's judgement was made with this information available to him. The Council is mindful that housing development on adjoining development to the north west is now under construction but the influence of that development (as a West Oxfordshire allocation and planning application approval) was previously considered. The Council is also cognisant of the landscape evidence submitted by West Oxfordshire District Council (Chris Blandford Associates). In its written statement to the Examination (Matter 8 -Written Statement) West Oxfordshire District Council argued

that the proposed allocation would, inter alia, have a potential adverse impact on the local landscape and setting of Woodstock.

- 8.14. The Council has been conscious of Historic England’s position and the fact that, following the publication of the Proposed Submission Plan, no objection was received from ICOMOS. It has also been mindful of the site’s non-Green Belt location. However, it is clear that development of site PR10 would comprise a substantial development within close proximity to both Woodstock and the World Heritage Site and would change the local environment through the loss of countryside and the introduction of built development in an otherwise open setting.
- 8.15. The SA addendum notes that a reduced and/or less dense PR10 would most likely reduce the area of open greenfield land that would be developed and the potential scope and significance of adverse effects against SA objectives 9 (Historic Environment) and 13 (Efficient Use of Land). However, it noted that the same sensitivities and therefore the potential for significant negative effects still exist as for the original SA of the site. The SA also notes uncertainty as the exact scale, design and layout of a smaller allocation in this location (and any mitigations/enhancements) are unknown.
- 8.16. Having regard to all of the above considerations, and the fact that the Inspector’s concerns relate to the principle of development rather than the quantum or configuration, the Council considered that site PR10 was not suitable for the purpose of preparing main modifications. A re-configuration of the residential area would not overcome the Inspector’s concern of development extending into the countryside, causing significant harm to the setting of Woodstock and the character and appearance of the area. Similarly, a reduced number of dwellings on the site would not overcome the Inspector’s concerns on travel distance to Oxford and the wider relationship with the World Heritage Site.

Initial Working Assumption: the site is not taken forward into Main Modifications.

Options involving no additional Green Belt release

Option 2: Site PR3(a) – Proposed Safeguarded Land (southern extension of site PR8)

- 8.17. The site comprises some 7.8 hectares of land proposed for safeguarding in the Plan. The SA addendum notes the contribution that the site could make to the provision of housing, its accessibility and the potential contribution to health and well-being. It also notes significant negative effects with regard to road-based transport, landscape and efficient use of land but also some uncertainty.
- 8.18. Para. 85 of NPPF1 (2012) states that when defining Green Belt boundaries, local planning authorities (LPAs) should, where necessary, identify in their plans areas of ‘safeguarded land’ between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period. It also requires LPAs to make clear that the safeguarded land is not allocated for development at the present time. It advises that planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development. It further advises that LPAs should satisfy themselves that Green Belt boundaries will not need to be altered at

the end of the development plan period. The advice is brought through in the latest NPPF (para. 139).

- 8.19. The Partial Review is an unusual Plan in that a subsequent Plan of the same focused scope is unlikely to follow. Instead the long-term strategic needs of the county will be considered through the emerging Oxfordshire Plan 2050 followed by a full district Local Plan Review. It is important that altered Green Belt boundaries endure. The Council considers that the safeguarded land proposed (policy PR3a) provides the appropriate, proportionate contingency for the future:

“PR3(a) – we are safeguarding this land beyond the Plan period. The triangle of land is situated to the south of the land allocated under policy PR8. In this location the railway line to the east of Yarnton forms a consistent and strong Green Belt boundary down to the A44. PR3(a) is safeguarded for future consideration as it will make little contribution to Green Belt purposes following the development of land east of the A44. The land is not required to meet Oxford's development needs within this Plan period”. (2017 Plan, p.76).

- 8.20. The Inspector has not identified any concerns of principle with the Council's approach to safeguarding land and it is considered that proposing this land for development now would not accord with the requirements of the NPPF.

Initial Working Assumption – retain as safeguarded land

Option 3: Site PR3(b) – Land between site PR8 and the railway (minor eastward extension of site PR8)

- 8.21. This site comprises 0.7 hectares of land. The Plan states:

“PR3(b) – we are removing a small area of land from the Green Belt to the east of Yarnton adjacent to, and to the west of, the railway line. As a result of development to the east of the A44 (policy PR8), the railway line will become the consistent and strong Green Belt boundary at the eastern edge of the development site. There is no need for PR3(b) to be allocated, reserved or safeguarded for development.”

- 8.22. The SA Addendum notes significant positive effects with regard to housing, sustainable transport and health and well-being. Significant negative effects are noted for landscape and efficient use of land. The uncertainty of some effects is acknowledged. However, the Council considered that no additional development could reasonably be delivered as part of site PR8 by 2031.

Initial Working Assumption – not a deliverable option for 2031 for Main Modifications

Option 4: Site PR3(c) – Land to the south of the A34 to the west of site PR6b (westward extension of site PR6b)

- 8.23. This site comprises 11.8 hectares of land. The SA Addendum notes significant positive effects with regard to housing, employment and sustainable transport. Significant negative effects are noted for the historic environment and efficient use of land. The uncertainty of some effects is acknowledged.

8.24. The Plan (2017, p.76) states:

“PR3(c) – we are removing an area of land from the Green Belt to the south of the A34 to the west of the strategic development site allocated under policy 6b. Following the development of land to the north of Oxford and to the west of Oxford Road, the A34 will form the logical, permanent Green Belt boundary is this location. PR3(c) is not considered to be suitable for residential development but connectivity will be expected through the site to Oxford’s Northern Gateway site to the south.”

8.25. The Council’s reasons for ruling out this area of land for development are articulated in the SA (CD PR43d, section 10 para’ 10.60) and in the Housing and Economic Land Availability Assessment (HELAA) (CD PR79). Although the proposed development at North Oxford within Oxford City’s boundary will change the relationship of site PR3(c) to the surrounding area, the Council stands by its original assessment.

Initial Working Assumption - not a suitable option for Main Modifications.

Option 5: Site PR3(d) – Oxford Parkway Railway Station and Water Eaton Park and Ride (northward extension of PR6a)

8.26. The site comprises 9.9 hectares of transport infrastructure. The SA Addendum notes significant positive effects with regard to housing, employment and accessibility but mixed results for sustainable transport (noting the impact on transport infrastructure). Significant negative effects are noted for the historic environment and efficient use of land. Again, the uncertainty of some effects is acknowledged.

8.27. The Plan (2017, p.76) states:

“PR3(d) – we are removing the existing Oxford Parkway Railway Station and the Water Eaton Park and Ride from the Green Belt. The development of land in north Oxford to the east of Oxford Road (policy PR6a) results in other land in this area being removed from the Green Belt. Again, the A34 to the north will form the logical, permanent boundary.”

8.28. These are vital and, in part, new pieces of infrastructure. Whilst the County Council is seeking to establish new Park and Ride facilities further out from Oxford, it is for the County Council as Highways Authority to determine the longer-term transport use of the existing facilities through its Local Transport Plan. Proposing housing on an existing Park and Ride facility would require additional strategic transport work over a longer period of time.

Initial Working Assumption – not a suitable option for Main Modifications

Option 6: Site PR3e – Land north, east and west of Begbroke Science Park (northward extension of residential area into land reserved for employment)

8.29. The site comprises 14.7 hectares of land identified for the expansion of Begbroke Science Park. The SA Addendum notes significant positive effects with regard to housing, services and facilities and health and well-being. Significant negative effects are noted for landscape and efficient use of land. The uncertainty of some effects is acknowledged.

8.30. The Plan (2017, p.76) states:

“PR3(e) – we are removing land from the Green Belt to the north, east and west of Begbroke Science Park to ensure that a logical and permanent Green Belt boundary is established. This is in the context of, and in response to, development to the east of the A44 (policy PR8) and the conclusion of the Small Scale Green Belt Review which considers the high value employment needs at Kidlington-Begbroke. The potential extension of the Science Park will be considered further in Local Plan Part 2. Policy PR8 seeks reservation of the land for the potential expansion of the Science Park.”

8.31. The identification of this land is pursuant to policy Kidlington 1 of the adopted Local Plan 2011-2031 and is clearly evidenced. Considering the land for residential development would be contradictory to the objectives of that policy.

Initial Working Assumption - not a suitable option for Main Modifications

Option 7: Site PR6a – Land East of Oxford Road – intensification of developable area

8.32. The SA Addendum notes significant positive effects with regard to housing, employment and sustainable transport but significant negative effects for the historic environment and efficient use of land. It is noteworthy that the SA highlights the potential downside of what might commonly be seen as positive intensification i.e. the potential for more greenfield land to be developed within the confines of the existing developable area. The uncertainty of some effects is acknowledged.

8.33. Policy PR6a of the Plan (July 2017) proposes the construction of 650 dwellings on approximately 24 hectares on land east of Oxford Road. The Council considered whether some additional development could be achieved.

8.34. The review of the Plan, evidence and changes in circumstances identified that an additional one hectare of land was potentially available for housing. Policy PR6a (2017) requires the provision of a primary school on the site with at least three forms of entry (3FE) on 3.2 hectares of land. During the consultation on the Proposed Submission Plan the County Council provided updated information (CD PR78, PR-C-0832) indicating that the school requirement could be reduced to a two-forms of entry primary school on 2.2 hectares of land.

8.35. The Council’s Explanatory Note on Housing Figures (HEAR 2) clarifies the approach taken to housing figures for the site. Table 3 shows that 650 homes could be provided at a net density of 40dph. Table 2 shows that account was taken of the site’s edge of Oxford location whilst recognising the landscape setting to the east from the Cherwell Valley, and listed St Frideswide Farmhouse.

8.36. The slightly lower density (37dph) in Table 5 reflects the fact that the additional one hectare of land became available but that no allowance was made for additional dwellings. It was therefore considered that an additional 40 homes could in principle be achieved.

- 8.37. No other changes in circumstances were identified that would affect the Council's 'broadly sensible' approach to the Plan's housing figures. Having considered changes of circumstance and having regard to the fact that the Inspector considered the allocation to be 'sound' in principle, it is considered that there are no further tolerances in the context of the site's constraints.

Initial Working Assumption – an increase from 650 to 690 homes

Option 8: Site PR6b - Land West of Oxford Road – intensification of developable area

- 8.38. The SA Addendum notes significant positive effects with regard to housing, employment and sustainable transport but significant negative effects for the historic environment and efficient use of land. The uncertainty of some effects is acknowledged.
- 8.39. Policy PR6b of the Plan (July 2017) proposes the construction of 530 dwellings on 32 hectares on land west of Oxford Road. The Inspector's preliminary conclusions are that whilst he has no doubt that North Oxford Golf Club is a much valued facility, " *the site it occupies is an excellent one for the sort of housing the Plan proposes, given its location so close to Oxford Parkway, with its Park & Ride, and its proximity to the centre of Oxford.*"
- 8.40. The Council's Explanatory Note on Housing Figures (HEAR 2) clarifies the approach taken to housing figures for the site. Table 3 indicates a density of 25 dph for site PR6b in the Proposed Submission Plan. The relatively low density reflected the need for caution on numbers in view of the need to retain significant trees on the site.
- 8.41. The review of the Plan, evidence and changes in circumstances identified that there was now more information on important trees that gave reason to reconsider the capacity of the site. This included information from the site promoters and from the Council's internal landscape advisers to assess the significance of trees. Following internal advice from landscape and tree officers (CD PR124) the Council identified groups of trees to be retained. The Council's internal officers' assessment followed the review of developer's information and an assessment of trees on site. The groupings of important and moderate significant trees identified through Council's internal advice are shown in Figure 2 of the Council's Site Capacity Sense Check, September 2019 (CD PR110).
- 8.42. Desk top analysis of this information suggested that there was potential to increase the capacity of the site. Being mindful of Policy PR6b place shaping principles guiding proposals to '*reflect the historic use of the site*' and provision of '*larger plots and wider streets to accommodate the mature trees of the former golf course*' officers estimated that about 600 homes might be accommodated subject to more detailed testing.

Initial Working Assumption – an increase from 530 to 600 homes

Option 9: Site PR7a – South East Kidlington – intensification of developable area

- 8.43. The SA Addendum notes significant positive effects with regard to housing, employment, sustainable transport and health and well-being. The uncertainty of some effects is acknowledged.

- 8.44. Policy PR7a of the Plan (July 2017) proposes the construction of 230 dwellings on approximately 11 hectares on land east of Bicester Road.
- 8.45. The Council’s Explanatory Note on Housing Figures (HEAR 2) clarifies the approach taken to housing figures for the site. Table 3 shows that 230 homes could be provided at a net density of 35 dph (avoiding development in a small part of the site within Flood Zones 2 & 3).
- 8.46. No changes in circumstances were identified that would affect the Council’s ‘broadly sensible’ approach to the residential area already identified. Having regard to the fact that the Inspector considered the allocation to be ‘sound’ in principle, it was considered that there were no further tolerances in the context of the site’s constraints.

Initial Working Assumption – no additional dwellings on the existing developable area

Option 10: Site PR7b - Stratfield Farm – intensification of developable area

- 8.47. The SA Addendum notes significant positive effects with regard to housing, sustainable transport and health and well-being but significant negative effects for the efficient use of land. The uncertainty of some effects is acknowledged.
- 8.48. Policy PR7b of the Plan (July 2017) proposes the construction of 100 dwellings on approximately 4 hectares on land at Stratfield Farm.
- 8.49. The Council’s Explanatory Note on Housing Figures (HEAR 2) clarifies the approach taken to housing figures for the site. Table 3 shows that 100 homes could be provided at a net density of 25 dph having regard to the setting of the listed farmhouse.
- 8.50. As a result of promoter engagement with the County Council as Local Highways Authority, a less rigid position on the number of homes that could be accessed from the Kidlington roundabout emerged (later confirmed in CD PR112).
- 8.51. However, the constraints of the site and the objectives of the policy led to a conclusion that no further development could be achieved on the development area already identified, having regard to the Council’s ‘broadly sensible’ approach and the Inspector’s advice that the allocation to be ‘sound’ in principle.

Initial Working Assumption – no additional dwellings on the existing developable area

Option 11: Site PR8 – Land to east of the A44 – intensification of developable area

- 8.52. The SA Addendum notes significant positive effects with regard to housing, sustainable transport and health and well-being but significant negative effects for landscape and efficient use of land. The uncertainty of some effects is acknowledged.
- 8.53. Policy PR8 of the Plan (July 2017) proposes the construction of 1950 dwellings on approximately 66 hectares on land next to Begbroke / Yarnton.
- 8.54. The Council’s Explanatory Note on Housing Figures (CD HEAR 2) clarifies the approach taken to housing figures for the site. Table 3 shows that 1950 homes could be provided at a net

density of 45 dph having regard to the potential for some higher density development on parts of the site.

- 8.55. No changes in circumstances were identified that would affect the Council's 'broadly sensible' approach and having regard to the fact that the Inspector considered the allocation to be 'sound' in principle.
- 8.56. It was considered that additional homes could not be delivered on the site by 2031.

Initial Working Assumption: no change

Option 12: Site PR9 Land West of Yarnton – Intensification of developable area

- 8.57. The SA Addendum notes significant positive effects with regard to housing, sustainable transport and health and well-being but significant negative effects for employment and efficient use of land. The uncertainty of some effects is acknowledged.
- 8.58. Policy PR9 of the Plan (July 2017) proposes the construction of 530 dwellings on approximately 16 hectares of land on land west of Yarnton.
- 8.59. The Council's Explanatory Note on Housing Figures (CD HEAR 2) clarifies the approach taken to housing figures for the site. Table 3 indicates a density of 35dph for site PR9 in the Proposed Submission Plan, but notes that this assumes the 30% gross to net discount being effectively removed due to potential for shared use of playing pitch, incorporation of play facilities on that land, and immediate access to open space to the west, otherwise gross density would be high at 47 dph.
- 8.60. Following representations from the site promoter the Council further considered the precise number of dwellings to be accommodated on the site to improve deliverability and achieve a high quality of design, bearing in mind the linear form of the site and its relationship with PR8. Table 5 (CD HEAR 2) indicated a reduction to 440 dwellings, reducing gross density to 28 dph.
- 8.61. The Inspector's preliminary conclusions refer to the depth of the developable area and implications for design and layout (i.e referring to the scope for a site extension).
- 8.62. The Council considered that no additional development could be achieved on the existing developable area as identified in the Plan (July 2017).

Initial working assumption: no change to density of development within the existing developable area

Options involving additional Green Belt release

- 8.63. During the initial assessment of options involving no additional Green Belt release it was evident that there was likely to be a shortfall in the number of dwellings required, and that the Council would need to consider whether exceptional circumstances exist to justify further release of Green Belt land to meet the housing requirements. Options involving additional Green Belt release within the scope of the Plan's strategy and in the context of

the Inspector's advice (CD PC5) were therefore considered. Consideration of exceptional circumstances are found in Section 13 below.

Option 13: Site PR6a – Land east of Oxford Road (eastwards extension into Green Belt)

- 8.64. The SA Addendum notes significant positive effects with regard to housing, employment and sustainable transport but significant negative effects for the historic environment and efficient use of land. The uncertainty of some effects is acknowledged.
- 8.65. For the reasons articulated in submitted evidence (CD PR51), an eastward expansion of the site was considered to be inappropriate in terms of landscape impact. The possibility of a northern extension is discussed at 8.26.

Initial Working Assumption: extension unsuitable

Option 14: Site PR6c – Land at Frieze Farm (new housing proposal within the Green Belt i.e. with Golf Course)

- 8.66. The SA Addendum notes significant positive effects with regard to housing and sustainable transport but significant negative effects for landscape and efficient use of land. The uncertainty of some effects is acknowledged.
- 8.67. Policy PR6c of the Plan (July 2017) is reserved for a replacement Golf Course. No land at Frieze Farm was already identified for Green Belt release. The Inspector advised that there may be the possibility that this site could accommodate some housing as well as any replacement golf course. He also advised that development of the site might provide the opportunity for the development of a link road between the A44 and A34.
- 8.68. The Council's site selection conclusions as recorded at section 10, para's 10.130 – 10.132 of the Sustainability Appraisal (CD PR 43) included, "..... Residential development would be segregated from Oxford and separated from Kidlington and Yarnton. Development would breach the A34 and be perceived as a freestanding development and a new highly urbanising influence between Oxford and Cherwell. The relatively exposed and elevated nature of the site to the south would result in residential development being highly visible from the north. Central and eastern land parcels are land locked by road and rail corridors.
- 8.69. Development of the site for housing would entail the additional release of Green Belt land in a new location. The Council does not depart from its original conclusions and therefore did not consider that the site should be brought forward for further consideration in the first instance. However, in light of the Inspector's comments, it was considered that land at Frieze Farm should be kept within scope if preparation of Main Modifications should result in an unmet housing requirement. It would have to be clear that the homes could not be provided on the sites already identified for residential development, and, in view of the Council's original conclusions about its unsuitability for housing, the site would need to be considered along with other sites within Areas of Search A and B.

Initial Working Assumption – only within scope if homes could not be distributed on existing sites and exceptionally required in the context of other alternatives

Option 15: Site PR7a – South East Kidlington (southern extension of residential area into Green Belt)

- 8.70. The SA Addendum notes significant positive effects with regard to housing, employment, sustainable transport and health and well-being.
- 8.71. The Green Belt Study (PR40, site PR178) indicated that the release of the field immediately to the south of that already proposed in the Plan would have the same impact on the harm to the Green Belt as the proposed submission site. It was considered that, exceptionally, there might be scope to extend the developable area for the site PR7a (land south east of Kidlington) in a southerly direction, notwithstanding the Council’s original objective of maximising the remaining gap between new development and development to the south of the A34. An existing field boundary, containing approximately 9 hectares on land, marks the extent of this land.
- 8.72. By continuing to apply the assumptions on density for this site set out in CDC document HEAR 2 it was estimated that extending the site by 9 hectares could accommodate an additional 200 dwellings.

Initial Working Assumption – if exceptionally required, an increase from 230 to 430 homes with an additional 9 hectares of Green Belt land released

Option 16: Site PR7b – Stratfield Farm (potential western/southern extension of residential area into Green Belt)

- 8.73. The SA Addendum notes significant positive effects with regard to housing, sustainable transport and health and well-being but significant negative effects for efficient use of land.
- 8.74. The Green Belt Study (PR40, site PR49) indicated that the release of the field immediately to the south and west of that already proposed in the submission plan would have the same impact on the Green Belt as the proposed submission site (approximately an additional one hectare of land). It was considered that, exceptionally, there might be scope to extend the developable area at site PR7b into this area of land (defined by a field boundary) while sufficiently accommodating the Council’s environmental objectives.
- 8.75. As a result of promoter engagement with the County Council as Local Highways Authority, a less rigid position on the number of homes that could be accessed from the Kidlington roundabout emerged (CD PR112 for confirmation).
- 8.76. It was considered that the setting of the listed farmhouse and important trees could be protected.
- 8.77. By continuing to apply the previous assumptions for this site (highlighted in CD HEAR 2) it was estimated that extending the site by one hectare could accommodate an additional 30 dwellings.

Initial Working Assumption – if exceptionally required, an increase from 100 to 130 homes with an additional 1 hectare of Green Belt land released.

Option 17: Site PR8 – Land east of the A44 (eastern extension of residential area into Green Belt to the east of the railway)

- 8.78. The SA Addendum notes significant positive effects with regard to housing, sustainable transport and health and well-being but significant negative effects for landscape and efficient use of land.
- 8.79. For the reasons set out in submitted evidence (e.g. Matter 6 – Written Statement-CDC), the Council considered that an extension of this site to the east of the railway line would not be suitable in terms of the impact on the Green Belt and the need to retain an appropriate gap between new development and Kidlington alongside the Oxford Canal.

Initial Working Assumption – extension unsuitable

Option 18: Site PR9 – Land to the west of the A44 (western extension of residential area into Green Belt)

- 8.80. The SA Addendum notes significant positive effects with regard to housing, sustainable transport and health and well-being but significant negative effects for employment, landscape, the historic environment and efficient use of land.
- 8.81. Policy PR9 of the Plan (July 2017) proposes the construction of 530 dwellings on approximately 16 hectares on land next to the west of Yarnton.
- 8.82. The Inspector advised that he had sympathy with the promoter’s view that a more satisfactory development might be achieved by extending the residential development area westwards. He also suggested that, in doing so, the Council considers whether some additional homes could be achieved.
- 8.83. Initial engagement with the Council’s Landscape Adviser suggested that there could be some potential subject to more detailed analysis. In the context of the Inspector’s advice, a re-examination of the promoter representations and the Council’s existing evidence (particularly on landscape and Green Belt), it was considered that a working assumption of approximately 600 homes should be put forward for further testing but only if additional Green Belt land was required.
- 8.84. *Initial Working Assumption – if exceptionally required, an increase from 530 to 600 on an area of Green Belt land to the west of the existing developable area*

Summary of Initial Working Assumptions

- 8.85. The initial working assumptions, for further testing, were as shown below:

Table 2:

Site	Number of dwellings in 2017	Initial Working Assumption 2019	Potential Green Belt Change	Net change
PR6a	650	690	No additional Green Belt	+40

PR6b	530	600	No additional Green Belt	+70
PR7a	230	430	Green Belt affected	+200
PR7b	100	130	Green Belt affected	+30
PR8	1950	1950	(no change)	No change
PR9	530	600	Green Belt affected	+70
PR10	410	0	Land outside of the Green Belt removed	-410
	4400	4400		0

9. Engagement with promoters

9.1. Meetings were held with the following promoters to provide an opportunity for each to identify any key issues that they considered the Council needed to take into account. Each was subsequently provided with a formal opportunity to submit information. It was considered that wider promoter engagement would only be required if the requisite number of homes could not be accommodated.

- Blenheim Estate – Site PR10
- Savills – Sites PR6a & PR6b
- Turnberry – Site PR6c
- Barwood & Hill Residential – Site PR7a
- Carter Jonas & Manor Oak - Site PR7b
- David Lock & Carter Jonas – Site PR8
- Gerald Eve / Merton College – Site PR9

9.2. The formal information received (August 2019) is submitted as part of the Council’s evidence base.

Site PR10- Land South East of Woodstock

9.3. The site promoter for PR10 submitted an updated development concept (CD PR123) in response to the Inspector’s preliminary conclusions, to address matters relating to settlement morphology and seek to demonstrate that the site provides a suitable sustainable and deliverable site for a new garden neighbourhood for 500 homes. A copy of e-mail exchanges with ICOMOS was later submitted which confirms ICOMOS’s position on site PR10 (CD PR123h).

9.4. The Council had regard to these submissions but considered that they did not affect its consideration of the Inspector’s preliminary conclusions nor warranted the production of additional evidence. ICOMOS had been consulted on the Proposed Submission Plan but did not respond.

Site PR6a- Land East of Oxford Road

- 9.5. The site promoter considers that site PR6a can accommodate an additional 40 dwellings by virtue of the smaller site required for school provision (CD PR116).
- 9.6. This concurred with the Council's view on the number of additional units that could be accommodated as a result of lower land take requirements. No other change of circumstances was identified.

Site PR6b- Land West of Oxford Road

- 9.7. The site promoter provided two scenarios for site PR6b (CD PR117). Based on the groupings of important and moderate significant trees identified by the Council, the Council was advised that approximately 696 dwellings could be accommodated on 17.4 ha. Based on further assessment work by the site promoter in relation to trees on the site and their relationship to its proposed green infrastructure strategy, the Council was advised that 740 dwellings could be accommodated on 18.5 ha.
- 9.8. This information was used to inform further consideration of site capacity.

Site PR6c- Land at Frieze Farm

- 9.9. The site promoter recommended that Frieze Farm be brought forward as a new allocation to minimise disruption to the Plan, place the transport strategy on a sounder footing and bring clarity around golfing re-provision. The submission indicates that the site could accommodate 410 dwellings and a 9-hole golf course (CD PR118).
- 9.10. This information did not alter the Council's position.

Site PR7a- Land South East of Kidlington

- 9.11. The site promoter's submission considered that the site could deliver an additional 200 homes through an extension of the residential area southwards, as previously promoted. It was suggested that a revised Green Belt boundary could follow a strongly defined field boundary for much of its length and restore a historic hedgeline for the remaining section (a map extract indicating the historic field boundary was provided) (CD PR119).
- 9.12. This information was used to inform further consideration of site capacity and potential Green Belt release.

Site PR7b- Land at Stratfield Farm

- 9.13. The site promoter for PR7b submitted a site layout illustrating a scheme for approximately 165 new dwellings on an extended residential area involving additional Green Belt release (CD PR120).
- 9.14. This information was used to inform further consideration of site capacity and potential Green Belt release.

Site PR8- Land East of the A44

- 9.15. The site promoters' submissions (CD PR121) did not suggest that additional dwellings could be accommodated on PR8 or that there had been a change in circumstances since their original submissions.
- 9.16. This information was used to inform further consideration of the distribution of the 410 homes.

Site PR9- Land West of Yarnton

- 9.17. Three schemes were submitted by the promoter: one for 536 homes on 15.3 hectares of land, the second for 710 homes on 18.12 hectares and the third for 780 homes on 19.9 hectares of land. A draft framework plan was submitted with a capacity analysis and incorporating revisions to site layout and to accommodate an area of land for a primary school playing field. A Landscape Appraisal Addendum was also submitted (CD PR122).
- 9.18. This information was used to inform further consideration of site capacity and potential Green Belt release.

10. Evidence testing and technical engagement

- 10.1. Cooperative engagement commenced with the County Council immediately. It was recognised that its input on the transportation and infrastructure planning implications of any Main Modifications would be essential. The Council has worked with the County Council on a continuous, iterative basis.
- 10.2. Consultants were re-engaged to assist with the following matters.
- 10.3. **Landscape** (CD PR51) – additional work (CD PR108) was undertaken to determine the appropriateness of extending site PR9 westwards onto higher ground. A site meeting took place with the promoters and landscape advisers. It was initially concluded that there was some further potential to extend PR9. The Council brought this conclusion into its thinking with a view to obtaining more detailed assessment once it was clear whether a limited or wider expansion of the site might be required.
- 10.4. **Transport** (CD PR52) – additional work (CD PR109) identified no significant barriers to the redistribution of 410 homes across the three areas of north Oxford, Kidlington and the A44 corridor. The County Council was engaged as a partner on this work. It advised that there would be no significant change to the implementation of its transport strategy as a result of the initial working assumptions; that its proposed Park and Ride at London-Oxford airport and rapid transit proposals would not be affected (other than for matters such as the implementation of specific highway measures such as stops/laybys); and, that there would be no clear benefit from the provision of a link road across Frieze Farm.
- 10.5. **Green Belt** (CD PR40) – an addendum (CD PR104) to the Cherwell Green Belt Study (PR40) was commissioned to provide advice on potential Green Belt impacts and the positioning of revised Green Belt boundaries. The Council engaged with the consultants as it became clear that some additional Green Belt release was likely to be needed. Having regard to all

existing and emerging evidence and the initial working assumptions, it was clear that potential additional release needed to be considered at sites PR7a, PR7b and PR9.

- 10.6. **Water Cycle Study** (CD PR81) – an addendum (CD PR105) to the study was commissioned to assess the impact of the proposed redistribution of dwellings on the conclusions of the Water Cycle Study 2017 (PR81). The working assumptions being examined were not considered to be significant and the summary and recommendations of the 2017 WCS were still considered to be valid.
- 10.7. **Strategic Flood Risk Assessment (SFRA)** (CD PR31, PR32, PR94) – the Council’s consultants advised that further flood risk assessment work was not required, as the Council’s existing evidence base provided sufficient information to assess the proposed modifications to the proposed development sites. A check was undertaken against the latest flood risk maps. The potential new residential areas within allocated sites PR7a, PR7b and PR9 had already been assessed as part of the overall site assessments (sites SFRA178 (PR7a), SFRA49 (PR7b) and SFRA51 (PR9), and all lay within Flood Zone 1. There are small areas of surface water flooding shown as affecting the sites, but these were considered in the original site assessments and the drafting of policies.
- 10.8. **Ecological Cumulative Impacts** (CD PR34) and addendum (CD PR106) – consultants were commissioned to assess any changes in cumulative impacts and the significance on ecological features/sites identified including Rushy Meadows Site of Special Scientific Interest (SSSI). No significant changes were identified and the study’s recommendations (CD PR34) were not altered.
- 10.9. **Site capacity** – the Council’s urban design advisers examined the Council initial working assumptions in the context of any new information available including promoter submissions. Their conclusions (CD PR110) provided some variance from the Council’s initial working assumptions. In particular, it showed that:
 - i. **site PR6b** - greater layout efficiencies could be achieved while still delivering proposed place shaping principles. It was recommended that average density be increased to 30 dph on 22.4 hectares (672 dwellings);
 - ii. **site PR7a** – a potential new southern boundary could be accommodated which resulted in an acceptable design. No change to the working assumption for the additional number of new homes (200) was suggested;
 - iii. **site PR7b** - given site constraints, some flats would be required to achieve an increase in housing numbers to about 130 units should an additional field parcel be accommodated;
 - iv. **site PR9** - a reduction in density and increase in the developable area was an appropriate response to both the site’s constraints and character considerations. A reduction to about 30 dph was suggested.

- 10.10. **Sequential Test and Exception Test (Flooding)** - The Council’s Sequential Test produced in June 2017 (CD PR53) and updated in February 2018 (CD PR95) considers the flood risk for potential strategic development options and their wider sustainability informing the allocation of sites for new homes to meet some of Oxford’s unmet housing needs in the Council’s Partial Review. No change was being proposed to the Council’s development strategy. The potential extensions to the development areas being considered were within flood zone 1. The Council considered that the existing flood risk assessment work and sequential test were sufficient to inform and justify the Council’s proposed modifications. The Council’s adopted Local Plan seeks to manage and reduce flood risk and the site policies in the Partial Review require a flood risk assessment for planning applications and would address any remaining minor flood risk.
- 10.11. **Habitats Regulations Assessment (CD PR98)** – the Addendum (CD PR107) assessed whether the redistribution of 410 houses and associated modifications to the Plan were likely to affect the findings of the Habitats Regulations Assessment Stage 1 Screening and Stage 2 Appropriate Assessment August 2018 (PR98). The Addendum concluded that the working assumptions did not change the findings and conclusions of the HRA 2018.
- 10.12. **Sustainability Appraisal (CD PR43)** – A SA Addendum (September 2019, CD PR113) was commissioned to inform the proposed modifications. It informed site selection (see section 8 above) and policy development. It included
- a summary of developments in the Plan baseline, including updates to evidence base.
 - a summary of the new plans, policies and programmes published of relevance to the Plan.
 - a schedule of the proposed modifications to the Plan, and their alternatives, and SA of their likely effects.
- 10.13. The emerging findings from evidence were relayed to the County Council to enable it to continue with its consideration of transport and infrastructure matters.

11. Formation of proposed modifications and further testing

- 11.1. The conclusions from evidence and technical engagement were examined to reconsider the initial working assumptions and prepare draft modifications. The number of dwellings proposed for sites PR6b, PR7b and PR9 changed from the initial working assumptions:

Table 3:

Site	Number of dwellings in 2017	Initial Working Assumption (2019)	Revised Draft number of dwellings (2019)	Net change
PR6a	650	690	690	+40
PR6b	530	600	670	+140
PR7a	230	430	430	+200
PR7b	100	130	120	+20
PR8	1950	1950	1950	No change

PR9	530	600	540	+10
PR10	410	0	0	-410
Total	4400	4400	4400	0

11.2. As necessary, the draft modifications were fed back into evidence testing on matters of transport (CD PR109), landscape (CD PR108), the water cycle study (CD PR105), ecology (CD PR106), Green Belt (CD PR104), Habitats Regulations Assessment (CD PR107), the site capacity work (CD PR110) and Sustainability Appraisal (CD PR 113).

11.3. As a consequence, the following additional findings emerged.

11.4. The **Landscape Assessment for site PR9** (CD PR108) concluded that the landscape could accommodate residential development on the lower slopes in the east of the study area, avoiding rising up the steeper mid-slopes, so that the enclosing function of the landform to the lower-lying broad vale would be retained. The westward extent of development should be related to the 75m AOD contour, although the strong vegetation structure to the large central field could accommodate development to about the 78m contour. A substantial green infrastructure for the development and the outer buffer of accessible greenspace would need to be secured through a development brief and a long-term management plan.

11.5. **The Green Belt Study Addendum** (CD PR104) advised as follows:

- i. **Site PR7a** – an additional release of land to the south would further erode the size of this contained area of open land but would not represent a step-change in Green Belt harm. The Addendum considered two alternative Green Belt boundaries for the southern boundary of the triangle of land. Both involved the creation of a new boundary. The evidence did not suggest a material difference between the two alternative boundaries. The modifications propose that the new planted boundary follows the line of the former field boundary removed during the 20th century.
- ii. **Site PR7b** - the release of an additional field from the Green Belt in the central part of study parcel PR49 (rated as low-moderate for harm) would not lead to a significant change in harm. Although there would be advancement of the inset settlement edge by about 70m, a field boundary hedgerow would mark a clear Green Belt edge.
- iii. **Site PR9** - the Submission Plan's proposed western boundary followed, for the most part, existing field boundaries. These boundaries also mark a distinction between areas closer to Yarnton, rated at moderate and moderate-high harm, and land to the west which was rated at high harm.

The rising landform and absence of field boundaries in the area into which further settlement expansion is proposed are the reasons for the higher harm rating, but some gradation can be identified. There is a distinction between the more gentle lower slopes on which development is proposed and the steeper hillside beyond, which is more clearly countryside. The Cherwell Green Belt Study (PR40) also noted that the higher ground formed part of the ring of hills that constitutes a key element

in Oxford's historic setting, contributing to the preservation of the City's setting and special character (the 4th Green Belt purpose), but that the lower slopes were also significant in this respect.

The change in slope is not dramatic, so the precise location of a new boundary would make little difference in Green Belt terms, but a new Green Belt edge approximating to the lower end of this topography (at around the 75m contour) would nonetheless define an area in which harm to the Green Belt purposes, although greater than that associated with the formerly proposed release, would be lower than the harm associated with the release of the higher slopes.

- 11.6. **Site capacity work (CD PR110)** – the findings of landscape and Green Belt work were fed into the site capacity work to help finalise the conclusions.
- 11.7. The **Transport Assessment Addendum** (CD PR109) concluded that taken together, the proposed re-distribution of 410 dwellings were expected to have a net-positive overall effect on previously assessed transport impacts. Additional homes at sites PR6a, PR6b, PR7a and PR7b (located closer to Oxford and Oxford Parkway/Water Eaton Park and Ride) is expected to result in a net reduction of trips along the A44 corridor. Combined with greater scope for walking, cycling and public transport use the proposed re-distribution would help to ease forecast future congestion on the southern sections of the A44 corridor.
- 11.8. Oxfordshire County Council confirmed that the proposed re-distribution of 410 dwellings would require minimal changes to the package of transport improvements developed to support the Plan.
- 11.9. **Water Cycle Study** (CD PR105) - the analysis indicated that the proposals would result in a reduction in forecasted growth at Cassington and Woodstock Waste Water Treatment Works (WWTW), but an increase in forecasted growth for the Oxford WWTW. The change was not considered significant and the Addendum therefore confirms that the summary and recommendations of the 2017 WCS are still valid having regard to the proposed Main Modifications.
- 11.10. **Ecological Advice - Cumulative Impacts Addendum** (CD PR106) – this concluded that the proposed increase in dwellings on sites PR6a, PR6b, PR7a, PR7b and PR9 did not change the cumulative impact assessment for the strategic sites nor the recommendations in the original study (CD PR34).
- 11.11. **Habitats Regulations Assessment Addendum** (CD PR107) - this addendum to the Habitats Regulations Assessment Stage 1 Screening and Stage 2 Appropriate Assessment August 2018 (PR98) assessed the proposed modifications to determine whether the findings of the HRA 2018 are still pertinent. The Addendum concluded that the proposed modifications do not change the findings and conclusions of the HRA 2018. The proposed modifications will therefore not have an adverse effect on the integrity of Oxford Meadows SAC either alone or in-combination with other projects and plans.

12. Completion of sustainability appraisal and consideration of conclusions

- 12.1. The SA Addendum which considered the Main Modifications in the context of the original SA work, concluded that although there will be negative effects associated with the reallocation of the 410 homes from PR10 to the other existing proposed allocations (Policies PR6a, PR6b, PR7a, PR7b and PR9), the significance of these adverse effects has not changed from those already identified through the SA of the original number of homes allocated at each location.
- 12.2. More generally, it was concluded that the proposed modifications would contribute positively to, but not change, the overall cumulative effects of the Local Plan Partial Review as a whole, as recorded in the June 2017 SA Report. Similarly, the potential sustainability effects of the proposed modifications to the Local Plan Partial Review in combination with the likely effects of other related plans, programmes and projects are not different from those recorded in the June 2017 SA Report. The appraisal of alternatives in the SA addendum has informed the Council's modifications to the Proposed Submission Plan (July 2017). The Plan, with the modifications, with regard to the results of SA is considered to contribute towards the achievement of sustainable development.
- 12.3. Many of the proposed modifications do not alter the findings set out in the 2017 SA Report because they correct factual errors or represent minor updates to the wording of policies and supporting text for clarity rather than meaning.

13. Consideration of exceptional circumstances for additional Green Belt alterations

- 13.1. The Council's exceptional circumstances for the original Plan have been articulated in evidence. The Inspector has provided advice that he considers that there are exceptional circumstances for development in the Green Belt. The Inspector noted that the Council would need to demonstrate exceptional circumstances for any further changes.
- 13.2. The Council relies on its original evidence with the following additional circumstances:
 - i. the proposed housing requirement has been found to be sound;
 - ii. the Plan's strategy has been found to be sound;
 - iii. there are now no suitable options for development outside of the Oxford Green Belt (with the deletion of site PR10);
 - iv. all other proposed allocations have been found to be sound in principle;
 - v. the Council's approach to housing figures and the alteration to Green Belt boundaries has been found to be 'broadly sensible';
 - vi. in preparing modifications the Council has considered carefully whether additional development could be achieved without further alteration to Green Belt boundaries. Additional housing can be accommodated on sites PR6a and PR6b, however this would not account for all of the 410 dwellings shortfall resulting from the deletion of site PR10;

- vii. in the context of housing need and the plan’s strategy, additional Green Belt release at site PR7a (10 hectares) can be justified while retaining a significant, albeit narrower, gap (11.5 hectares) to the A34 and the achievement of policy objectives for green infrastructure and sport and recreation. The Council’s evidence demonstrates that additional development would be acceptable and contribute to the achievement of sustainable development;
- viii. in the context of housing need and the plan’s strategy, additional Green Belt release at site PR7b (1 hectare) can be justified while bringing development slightly further south from Kidlington. Whilst there is some impact on the environmental objectives for the site, it is considered that significant positive use of the Green Belt and net biodiversity gains can still be achieved as set out in the policy. The Council’s evidence demonstrates that additional development would be acceptable and contribute to the achievement of sustainable development;
- ix. in the context of housing need and the plan’s strategy, additional Green Belt release at site PR9 (9 hectares) can be justified while extending the development westwards. Whilst there is additional landscape impact, the Council’s additional evidence demonstrates that this would be acceptable. A deeper development can be achieved allowing for an improved layout and form of development and accommodating a wider playing pitch for the nearby school. The Council’s evidence demonstrates that the additional development would be acceptable and contribute to the achievement of sustainable development.

14. Consideration of deliverability and implementation

- 14.1. An updated infrastructure schedule was prepared informed by discussions with stakeholders including the County Council which forms part of the Schedule of Main Modifications.
- 14.2. The Housing Trajectory was updated and is included in the Proposed Modifications. The site phasing has been removed in light of the proposed deletion of site PR10 and the passing of time. The expected delivery rates at the proposed sites have been updated with the exception of the PR8 site (Land East of the A44) which remains unchanged. A 5.3-year supply can be achieved for 2021-2026; 2021 being the start date for monitoring delivery in accordance with the Oxfordshire Growth Board agreement (CD PR28, para. 3.5)
- 14.3. An update to the Plan’s viability assessment has been produced (CD PR111). This tested the viability of the proposed modifications as an addendum to the Viability Assessment 2017 (CD PR49). All sites are shown to be viable with 50% affordable housing.
- 14.4. The Council’s view is that the Plan with Main Modifications is deliverable by 2031.

15. Further Engagement and Finalisation of modifications

- 15.1 The ‘direction of travel’ on the Main Modifications was used to inform a series of discussions with prescribed bodies to determine whether there were any ‘show-stoppers’ or other key issues that required consideration (CD PR 114).

15.2 No issues were identified that required reconsideration of the modifications. Of note were informal comments seeking assurance that the Council would fully meet its housing requirements (to avoid the risk of subsequent overspill), interest in whether the modifications would lead to higher densities, and the need to avoid flood risk areas in considering increased densities/extending developable areas.

15.3 The modifications were subsequently finalised. The table below summarises the final housing numbers, areas and densities resulting from the proposed modifications, and supersedes Table 5 of HEAR 2 (CDC Housing Figures Note).

Site	Site Area (ha)	Gross Residential Area (excluding prescribed uses such as schools, land identified in site policy for specific uses) (ha)	Net Residential Area with 30% Discount	Proposed Number of Dwellings	Density on Gross Residential Area	Density on Net Residential Area
PR6a - Land East of Oxford Road	48	25	17.5	690	28	39
PR6b - Land West of Oxford Road	32	32	22.4	670	21	30
PR7a - Land South East of Kidlington	32	21	14.7	430	20	29
PR7b - Land at Stratfield Farm	10.5	5	3.5	120	24	34
PR8 - Land East of the A44	190	66	46.2	1950	30	42
PR9 - Land West of Yarnton	99	25	17.5	540	22	31
Total / Average				4400	24	34

16. Conclusions

16.1 The Council has prepared a Schedule of Main Modifications to respond to the Inspector’s invitation in his Post Hearing Advice Note to make alternative provision for the 410 dwellings proposed in the submission plan at site PR10 (land south east of Woodstock).

16.2 The Main Modifications have been prepared having regard to the Plan’s strategy and objectives; the results of the Sustainability Appraisal on site selection, through the detailed findings of evidence, including on transport, landscape, green belt, ecology, flood risk, a site capacity sense check, the process of Sustainability Appraisal and considerations of deliverability and viability. All reasonable spatial options have been considered and unsuitable options have been discounted. The Council considers that the proposed Main Modifications have been soundly prepared and will achieve sustainable development.

16.2 The Council has sought to minimise the additional land to be removed from the Green Belt. It considers that the harm caused to the Green Belt is outweighed by the benefits of locating

development in accordance with the Plan strategy and that exceptional circumstances have been demonstrated.