



www.landuse.co.uk

Cherwell Local Plan Submission SA Addendum for Main Modifications (October 2014): Non-Technical Summary

Final Report
Prepared by LUC
October 2014

Planning & EIA
Design
Landscape Planning
Landscape Management
Ecology
Mapping & Visualisation

LUC BRISTOL
14 Great George Street
Bristol BS1 5RH
Tel: 0117 929 1997
Fax: 0117 929 1998
bristol@landuse.co.uk

Offices also in:
London
Glasgow
Edinburgh



FS 566056
EMS 566057

Land Use Consultants Ltd
Registered in England
Registered number: 2549296
Registered Office:
43 Chalton Street
London NW1 1JD

LUC uses 100% recycled paper

Project Title: Cherwell Local Plan SA Addendum for Main Modifications

Client: Cherwell District Council

Version	Date	Version Details	Prepared by	Checked by	Approved by Principal
1	19/08/2014	Final NTS for consultation	Jeremy Owen	Taran Livingston	Jeremy Owen
2	14/10/2014	Final NTS for Submission	Jeremy Owen Josh Allen	Taran Livingston	Jeremy Owen

Contents

Introduction	5
Sustainability Appraisal and Strategic Environmental Assessment	5
Purpose of this SA Addendum Report Non-Technical Summary	5
Relevant policy context	6
Characteristics of areas likely to be affected	6
Method used for the SA	7
Consultation on the SA Addendum Report	13
Appraisal of quantum of additional development	14
Appraisal of overall spatial distribution of additional development	17
Appraisal of additional strategic development locations	22
Appraisal of proposed Main Modifications to the Submission Local Plan	38
Findings of the Habitats Regulations Assessment	41
Potential cumulative effects of the Cherwell Local Plan as proposed to be modified	41
Conclusions	42

Introduction

- 1.1 Cherwell District Council (CDC) commissioned LUC in June 2014 to carry out the additional Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) work required for the Cherwell Submission Local Plan.
- 1.2 During the Examination hearing sessions for the Local Plan in June 2014, the Inspector requested that CDC prepares Main Modifications to the Submission Local Plan, involving increased levels of housing delivery over the plan period to meet the full, up to date, objectively assessed needs of the District, as required by the National Planning Policy Framework (NPPF) and based on the Oxfordshire Strategic Housing Market Assessment 2014 (SHMA). The Inspector made it clear that the scope of the Main Modifications to the Local Plan should relate to the objectively assessed needs identified in the SHMA 2014 for Cherwell District. An SA/SEA addendum is needed to inform and test the Main Modifications to the Local Plan.

Sustainability Appraisal and Strategic Environmental Assessment

- 1.3 Under the Planning and Compulsory Purchase Act 2004, SA is mandatory for Local Plans. For these documents it is also necessary to conduct an environmental assessment in accordance with the requirements of the Strategic Environmental Assessment (SEA) Directive (European Directive 2001/42/EC). Therefore, it is a legal requirement for the Cherwell Local Plan to be subject to SA and SEA throughout its preparation.
- 1.4 The requirements to carry out SA and SEA are distinct, although it is possible to satisfy both using a single appraisal process. Government guidance¹ provides information to assist users in complying with the requirements of the SEA Directive through a single integrated SA process – this is the process that is being undertaken for Cherwell District. In addition, the guidance widens **the SEA Directive’s approach to include social and economic as well as environment issues. From here on, the term ‘SA’ should therefore be taken to mean ‘SA incorporating the requirements of the SEA Directive’.**

Purpose of this SA Addendum Report Non-Technical Summary

- 1.5 This report is the Non-Technical Summary of the SA Addendum to the full 2013 SA Report² for the Cherwell Local Plan Submission version, and should be read alongside that report, as together they seek to meet the requirements of the SEA Directive.
- 1.6 The SA Addendum describes the options considered by Cherwell District Council following the hearing sessions in June 2014, which include options for the quantum of housing and employment development to be delivered as well as spatial options relating to how development should be distributed across the District. The options have been subject to SA by LUC, and the findings **have informed Cherwell District Council’s** work on preparing Proposed Main Modifications to the Local Plan. This Non-Technical Summary summarises the potential sustainability effects of the options and summarises the **Council’s** reasons for selecting or discounting options. Finally, this Non-Technical Summary reports on the SA implications of the Main Modifications being proposed to the Local Plan, and highlights any differences from the Submission Local Plan.

Habitats Regulations Assessment

- 1.7 Under Article 6 (3) and (4) of the Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive) land-use plans, including Local Plans, are also subject to Habitats Regulations Assessment (HRA). The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European Site and to ascertain

¹ National Planning Practice Guidance 2014.

² Environ (December 2013) *Cherwell Local Plan Submission. Sustainability Appraisal Report.*

whether it would adversely affect the integrity of that site. The HRA process for the Cherwell Local Plan has been undertaken separately and has been updated to consider the proposed Modifications to the Submission Local Plan³. The HRA Screening Report found that the Cherwell District Council Submission Cherwell Local Plan incorporating Proposed Modifications will not lead to likely significant effects on Oxford Meadows SAC, alone or in combination with other plans and projects.

Relevant policy context

- 1.8 The most significant developments for the policy context of the emerging Main Modifications to the Cherwell Local Plan have been the Coalition Government's abolition of the regional spatial strategies, including the South East Plan, and the publication of the Oxfordshire Strategic Housing Market Assessment (SHMA) 2014 and the Strategic Economic Plans for Oxfordshire and South East Midlands. The increased housing need required for the District is the main reason behind the preparation of the Main Modifications.

Characteristics of areas likely to be affected

- 1.9 The SEA Directive requires the characteristics of all areas likely to be significantly affected by a plan or programme to be described. The likely sustainability effects of alternative options for a plan are normally assessed via a variety of baseline data which helps in the identification of the key environmental, social and economic issues, as well as the alternative ways of dealing with them.
- 1.10 Cherwell is situated in north Oxfordshire and lies between London and Birmingham, immediately north of Oxford and south of Warwick / Leamington Spa, located in the South East region. The District shares boundaries with Oxford City, South Oxfordshire, Vale of White Horse, West Oxfordshire, Aylesbury Vale, South Northamptonshire and Stratford upon Avon districts. The M40 runs through the District and there are good rail connections to Birmingham, London and beyond.
- 1.11 **The District's settlement hierarchy is dominated by the towns of Banbury and Bicester in the north and south respectively.** Banbury is the administrative centre for the District and fulfils a role as a regional centre. The third largest settlement is Kidlington which is both an urban centre and a village which is surrounded by the Oxfordshire Green Belt but is excluded from it. The District has over 90 smaller villages and hamlets.
- 1.12 Cherwell is largely rural in character. The Northern half of the District consists largely of soft rolling hills gradually sloping down towards the River Cherwell. The southern half of the District particularly around Bicester is much flatter. Much of the District is soft rolling hills with the northwest of the District laying at the northern edge of the Cotswolds.
- 1.13 Cherwell District contains many areas of high ecological value including sites of international and national importance, as outlined below. While the district is predominantly rural, its urban centres, parks and open spaces are just as much part of the local environment and provide important habitats for wildlife.
- 1.14 The distinctive character, appearance and high quality environment of Cherwell District is influenced by its historical interest. The District contains over 2,200 listed buildings, 60 conservation areas, 36 schedule monuments and many other assets of local architectural and historical interest. The three urban centres - Banbury, Bicester and Kidlington - have quite distinct characters, retaining their medieval street patterns
- 1.15 Cherwell District has an area covering approximately 228 square miles. The 2011 Census showed that Cherwell has a population of 141,868 people. This is up from a total 128,200 residents at the time of the last Census in 2001 which represents a 10.6% increase.

³ Atkins (August 2014) Submission Cherwell Local Plan incorporating Proposed Modifications. Habitats Regulations Assessment: Stage 1 - Screening

- 1.16 A key challenge for the District is how to manage and provide for an increasingly ageing population. Projections indicate that by 2033 the population of those aged over 65 in Cherwell will increase to constitute 24% of the total population.
- 1.17 Cherwell District ranks at 233 least deprived of the 348 local authorities ranked for overall deprivation in the 2010 Index of Multiple Deprivation. However, this masks a number of pockets **of deprivation. As noted in Cherwell's Sustainable Community Strategy parts of Banbury Ruscombe** ward are in the 20% most deprived areas nationally and 11 rural wards featured in the 20% most deprived in terms of access to housing and services.
- 1.18 The District is within the Oxfordshire housing market area which is a high value market. In 2012 the median house price in Cherwell was 216,000; although higher than the for the England median (£190,000), prices are; however, lower than in Oxford and the rural areas. House prices are cheaper in Bicester and Banbury in the north of the County, and that this is having the effect of helping first-time buyers to the market.
- 1.19 The District's largest employment sectors are: distribution, manufacturing, office, retailing and other services, and public sector employment including in health, defence and education.
- 1.20 Banbury is principally a manufacturing town and service centre whilst Bicester is a garrison town with a military logistics, storage and distribution and manufacturing base. Both towns are important economic locations. Kidlington functions as a village service centre but has a larger, varied employment base benefiting from its proximity to Oxford, its location next to the strategic road network, and of its proximity to both London-Oxford Airport and Begbroke Science Park. Bicester and Kidlington lie within Oxford's hinterland. In rural areas, the function of villages as places to live and commute from has increased as the traditional rural economy has declined. The number of people employed in agriculture fell by 18% between 1990 and 2000 and between 2007 and 2008 figures continue to show a decline.
- 1.21 The M40 motorway passes through Cherwell close to Banbury and Bicester. There are direct rail links from Banbury and Bicester to London, Birmingham and Oxford. The rail link from Bicester to Oxford is in the process of improvement as part of wider east-west rail objectives. The District has a clear social and economic relationship with Oxford and to a lesser extent with Northamptonshire.

Method used for the SA

- 1.22 The Draft Cherwell Local Plan - Part 1 was submitted to the Planning Inspectorate on the 31 January 2014. The examination hearings were suspended on 4 June 2014 for six months to enable the Council to put forward proposed modifications to the plan involving increased new housing delivery over the plan period to meet the full up to date, objectively assessed, needs of the District, as required by the National Planning Policy Framework (NPPF) and based on the Oxfordshire Strategic Housing Market Assessment 2014 (SHMA).
- 1.23 **In response to the Inspector's initial findings, Cherwell District Council officers have undertaken** additional work which considers a range of options to address the identified housing shortfall and associated implications for other land use. Officers have taken account of the evidence submitted by representors prior to the suspension of the hearings. Informal consultation and discussions have also taken place with key stakeholders and other interested parties.
- 1.24 A call for sites was undertaken and a range of options relating to the distribution of the additional development have been explored as follows:
- Further consideration of those reasonable alternative strategic development locations that were discounted for the Submission Local Plan, but which may now be required in order to deliver the increased level of growth needed in Cherwell District.
 - Identification of new reasonable alternative strategic development locations.
 - Increasing the density of development on existing strategic development locations included in the Submission Local Plan – Part 1 (non-strategic sites and development management policies will be dealt with in Local Plan Part 2).

- Extensions to the land covered by the existing strategic development locations so that they are of a larger size.
- 1.25 Options have been assessed by considering the following factors:
- How well each option relates to the strategic objectives of the Submission Local Plan.
 - National objectives and guidance as set out in the NPPF and the National Planning Practice Guidance (NPPG).
 - Deliverability of the options and the development potential of sites based on the information submitted through the call for sites, and the subsequent Strategic Housing Land Availability Assessment (SHLAA, updated 2014).
- 1.26 The Council considers that the increase in new housing is achievable without significant changes to the strategy, vision or objectives of the submitted Local Plan, and that there are reasonable prospects of delivery over the plan period. As a result, alternatives that do not accord with the spatial strategy in the submitted Local Plan are not considered by the Council to be reasonable alternatives. The strategic release of Green Belt land was therefore considered not to be a reasonable alternative, although the Local Plan is likely to require an early review once the established process for considering the full strategic planning implications of the 2014 SHMA, including for any unmet needs in Oxford City, has been fully considered jointly by all the Oxfordshire Councils. Similarly, strategic development outside the Green Belt that did not accord with the spatial strategy set out in the Submission Local Plan was not considered to be a reasonable alternative.
- 1.27 The selection of preferred options was also informed by SA, which forms the subject of this SA Addendum Report. The purpose of the SA is to objectively assess the options in terms of their likely economic, environmental and social impacts. The SA Addendum work builds upon the original SA work on the Submission Local Plan, and sought to assess the reasonable alternative options for providing for the additional development **identified to ensure the District's objectively assessed housing and employment needs are met for the Local Plan period until 2031**. The focus of the SA Addendum was on the quantum of growth and strategic development locations. Non-strategic sites and development management policies will be subject to SA during the preparation of Local Plan Part 2.
- 1.28 The work described above was used by the Council officers to inform the preparation of Proposed Modifications to the Submission Local Plan. Modifications are **of two types referred to as 'Main Modifications' and 'Minor Modifications'**. **Minor Modifications relate to factual updates and changes** which are not significant. However, Main Modifications are significant and relate to policies and proposals in the Plan, and could give rise to significant environmental, social and economic effects. The Main Modifications were therefore also subject to SA.
- 1.29 The SA has been undertaken in close collaboration with those involved in considering the alternatives for the Local Plan in order to fully integrate the SA/SEA process with the production of the Plan.
- 1.30 There are four components of work that the SA Addendum has covered:
1. Appraisal of reasonable alternatives for the additional quantum of housing and jobs to fully meet objectively assessed needs.
 2. Appraisal of reasonable alternatives for the spatial distribution of the additional development.
 3. Appraisal of reasonable alternatives for additional strategic development locations.
 4. Appraisal of proposed Main Modifications to the Submission Local Plan.

Approach to the Assessment

- 1.31 The SA has taken an **'objectives-led' approach to the assessment** using the same SA Framework as was developed originally for the SA of the Cherwell Local Plan used, although some minor amendments to some of the wording of objectives have been made to address some of the **statutory consultation bodies' responses to the SA Addendum Scoping Consultation**. The SA Framework as amended following the Scoping consultation is presented in **Table 1**.

Table 1: SA Framework for the Cherwell Local Plan SA Addendum

SA Framework		
SA Objective	Sub-Objective	SEA Topic
1. To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home.	<ol style="list-style-type: none"> 1. Will it contribute to the district housing requirements and completions and strategic housing requirements? 2. Will it increase the supply of affordable homes in urban and Health rural areas? 3. Will it contribute to providing additional homes for the homeless? 4. Will it reduce the percentage of unfit/ non-decent homes? 	Population and Human Health
2. To reduce the risk of flooding and resulting detriment to public well-being, the economy and the environment	<ol style="list-style-type: none"> 1. Will it reduce the risk of flooding from rivers, watercourses and sewer flooding to people and property? 2. Will it result in inappropriate development in the flood plain? 3. Will it increase the provision of sustainable drainage in new developments? 	Water and Soil, Climate Factors and Population and Human Health.
3. To improve the health and well-being of the population & reduce inequalities in health.	<ol style="list-style-type: none"> 1. Will it improve access to doctors' surgeries and health care facilities? 2. Will it encourage healthy lifestyles and provide opportunities for sport and recreation? 	Population and Human Health and Material Assets.
4. To reduce poverty and social exclusion.	<ol style="list-style-type: none"> 1. Will it assist in reducing poverty and social exclusion? 	Population and Human Health and Material Assets.
5. To reduce crime and disorder and the fear of crime.	<ol style="list-style-type: none"> 1. Are the principles of good urban design in reducing crime promoted as part of the proposal? 1. Will it assist in reducing actual levels of crime? 2. Will it assist in reducing the fear of crime? 	Population and Human Health
6. To create and sustain vibrant communities and engage cultural activity across all sections of the Cherwell community	<ol style="list-style-type: none"> 1. Will it encourage a mixed use and range of housing tenure, including meeting affordable housing needs including for key workers? 2. Will it improve residential amenity and sense of place? 3. Will it improve the satisfaction of people with their neighbourhoods as places to live and encourage ownership? 4. Will it reduce actual noise levels and/or reduce noise concerns? 5. Will it provide, protect or enhance locations for cultural activities, including the arts? 6. Will it enhance the townscape and public realm? 	Population and Human Health and Material Assets

SA Framework		
7. To improve accessibility to all services and facilities.	1. Will it promote compact, mixed-use development, with good accessibility to local facilities (e.g. employment, education, health services, shopping, leisure, green spaces and culture) that improves accessibility and decreases the need to travel?	Population and Human Health and Material Assets.
8. To improve efficiency in land use through the re-use of previously developed land and existing buildings, including the re-use of materials from buildings, and encouraging urban renaissance.	1. Will it maximise the provision of housing development on previously developed land as opposed to greenfield sites? 2. Will it maximise the provision of employment development on previously developed land as opposed to greenfield sites? 3. Will it maximise housing densities to make efficient use of land? 4. Will it promote the adoption of sustainable design in construction practices and the use of recycled materials? 5. Will it promote good design to create attractive, high quality environments where people will choose to live? 6. Will it ensure land is remediated where appropriate? 7. Will it reduce the loss of the best and most versatile soil to development?	All
9. To reduce air pollution including reducing greenhouse gas emissions and ensure the district is ready for its impacts	1. Will it promote more sustainable transport patterns including public transport, walking and cycling? 2. Will it address any particular air quality impacts arising from specific operational and/or construction related development activities? 3. Will it improve air quality? 4. Will it improve air quality at Oxford Meadows SAC? 5. Will it help increase the proportion of energy generated from renewable sources?	Air
10. To conserve and enhance and create resources for the district's biodiversity	1. Will it, protect, enhance or restore a locally or nationally designated site of nature conservation importance? 2. Will it assist Cherwell District Council's Biodiversity Action Plan (BAP) and/or the Oxfordshire BAP achieve its targets? 3. Will it conserve or enhance biodiversity assets or create new habitats? 4. Will it minimise the fragmentation of existing habitats and enhance, restore or create networks of habitats? 5. Will it conserve and enhance species diversity; and in particular avoid harm to protected species? 6. Will it encourage protection of and increase the number of trees?	Biodiversity Fauna and Flora
11. To protect, enhance and make accessible	1. Will it protect, enhance and restore the district's natural environment assets (e.g. the countryside, parks and green spaces, Public Rights of Way, common land, woodland and	Cultural Heritage

SA Framework		
for enjoyment, the district's countryside and historic environment.	<p>forest reserves, National Parks, AONBs etc.)?</p> <p>2. Will it protect, enhance and restore the district's cultural and heritage assets (e.g. Scheduled Ancient Monuments, Listed buildings, Historic Parks and Gardens and Conservation Areas)?</p> <p>3. Will it promote the accessibility of the district's countryside and historic environment in a sustainable and well-managed manner, protecting currently accessible countryside (either informally used or via public rights of way)?</p> <p>4. Will it maintain and enhance the landscape character, ecological quality of the countryside, including opens spaces within urban areas?</p> <p>5. Will it help preserve and record archaeological features?</p>	and Landscape and Biodiversity Fauna and Flora.
12. To reduce road congestion and pollution levels by improving travel choice, and reducing the need for travel by car/ lorry	<p>1. Will it promote more sustainable transport patterns and reduce the need to travel, particularly in areas of high congestion, including public transport, walking and cycling?</p> <p>2. Will it promote more sustainable transport patterns in rural areas?</p> <p>3. Will it reduce journey times between key employment areas and key transport interchanges?</p>	Air, Population and Human Health.
13. To reduce the global, social and environmental impact of consumption of resource by using sustainably produced and local products.	<p>1. Will it promote the use of locally and sustainably sourced, and recycling of materials in construction and renovation?</p> <p>2. Will it reduce emissions of greenhouse gases by reducing energy consumption?</p>	Climate Factors
14. To reduce waste generation and disposal, and achieve the sustainable management of waste	<p>1. Will it promote sustainable waste management practices through a range of waste management facilities?</p> <p>2. Will it reduce hazardous waste?</p> <p>3. Will it increase waste recovery and recycling?</p>	Water and Soil and Climate Factors
15. To maintain and improve the water quality of the district's rivers and to achieve sustainable water resources management	<p>1. Will it improve the water quality of the district's rivers and inland water?</p> <p>2. Will it enable recycled water to be used?</p> <p>3. Will it promote sustainable water resource management, provision of new facilities/ infrastructure or water efficient measures?</p>	Water and Soil and Biodiversity Fauna and Flora.
16. To increase	1. Will it lead to an increase in the proportion of energy	Climate

SA Framework		
energy efficiency and the proportion of energy generated from renewable sources in the district	needs being met from renewable sources? 2. Will it promote the incorporation of small-scale renewable in developments?	Factors
17. To ensure high and stable levels of employment so everyone can benefit from the economic growth of the district.	1. Will it promote accessible employment opportunities? 2. Will it promote employment opportunities accessible in rural areas? 3. Will it contribute to reducing short and long-term unemployment?	Population and Human Health and Material Assets
18. To sustain and develop economic growth and innovation, an educated/ skilled workforce and support the long term competitiveness of the district.	1. Will it encourage new business start-ups and opportunities for local people? 2. Will it improve business development and enhance productivity? 3. Will it enhance the image of the area as a business location? 4. Will it encourage inward investment? 5. Will it make land and property available for business development? 6. Will it assist in increasing the viability of the rural and farming economy? 7. Will it promote development in key sectors? 8. Will it promote regeneration; reducing disparities with surrounding areas? 9. Will it promote development in key clusters?	Population and Human Health and Material Assets
19. To encourage the development of buoyant, sustainable tourism sector.	1. Will it increase the employment of business opportunities on the tourism sector?	Population and Human Health

Predicting effects

- 1.32 The assessment has focused on the likely **significant effects** of implementing the reasonable alternatives for each of the four components addressed in the Addendum work. The assessment has been carried out using a matrix based approach. For each reasonable alternative, the matrix describes:
- The nature of the effect against each of the SA objectives, including whether it is likely to be positive or negative, permanent or temporary, and the timescale of the effect.
 - For each effect identified, the scope for mitigation (including reference to other policy or regulatory safeguards, either at the national level or through other policies in the Local Plan).

- Recommendations for further mitigation or improvements to the Local Plan to provide more in the way of positive effects will be put forward.

1.33 Symbols have been used to summarise the effects identified as follows:

++	Significant positive effect likely
+	Minor positive effect likely
0	Negligible effect likely
-	Minor negative effect likely
--	Significant negative effect likely
?	Likely effect uncertain
N/A	Policy is not relevant to SA objective

1.34 In carrying out the SA use has been made of Geographical Information Systems (GIS) which provide mapped data of key factors of relevance to the identification of significant effects such as:

- Landscape, biodiversity and cultural heritage designations.
- Agricultural land classifications.
- Areas at risk of flooding.
- Mineral deposits.
- Areas of social deprivation.
- Location of employment, retail, community facilities (e.g. schools and hospitals), neighbourhood centres.
- Transport network including public transport (bus, rail).

1.35 It has also been informed by the most recent technical studies including those listed as the Evidence Base within the Hearings Document List as well as updates since that list was produced, such as to the Strategic Flood Risk Assessment and the Landscape Capacity and Sensitivity Assessment.

1.36 The SA has also taken into account the findings of the Habitats Regulations Assessment (HRA) which has been updated separately by Atkins.

1.37 Cumulative effects have been considered by comparing the likely effects of the preferred options for modifications to the plan, within the context of all of the Main Modifications and the effects identified for the remainder of the Local Plan (in the 2013 original SA Report) in order to consider the cumulative effects of the potential modifications to the Local Plan as a whole.

Consultation on the SA Addendum Report

1.38 The results of the appraisal have been reported in the SA Addendum Report prepared alongside the Main Modifications to the Cherwell Local Plan that the Council has decided to put forward for the inspector to consider at the further hearings in December 2014. The consultation on the SA Addendum and Main Modifications to the Cherwell Local Plan will be for a 6 week period starting in August 2014.

Appraisal of quantum of additional development

- 1.39 The SA of the revised quantum of housing and employment related development identified as being needed in the light of new evidence over the Local Plan period to 2031 is described below.
- 1.40 It builds upon the work undertaken for the original SA of the Submission Local Plan.

Quantum of housing: Reasons for selecting the reasonable alternatives

- 1.41 The Strategic Housing Market Assessment was published in April 2014 and is up-to-date. It identified the objectively assessed need of 1,140 dwellings per annum. The Submission Local Plan included a proposed housing requirement of 16,750 homes from 2006-2031. At 31 March 2011, 2,542 completions had been recorded, leaving a requirement of 14,208 homes from 2011-2031 or a requirement of approximately 710 dwellings per annum. The objectively assessed housing need is therefore 430 homes per annum greater over the same period (2011-2031).
- 1.42 Over time, unmet needs arising from other Local Planning Authority areas in Oxfordshire may be identified. However, upon suspending the Local Plan Examination, the appointed Inspector advised:
- "For the avoidance of doubt, the Council has indicated that it considers the increase in new housing needed to be achievable without significant changes to the strategy, vision or objectives of the submitted plan. There are considered to be reasonable prospects of delivery over the plan period.*
- "This includes that there is no necessity for an immediate strategic review of the extent/boundaries of the Oxford Green Belt in the district for new housing, albeit the plan is likely to require an early review once the established process for considering the full strategic planning implications of the 2014 SHMA, including for any unmet needs in Oxford City, has been fully considered jointly by all the Oxfordshire Councils."*
- 1.43 The Submission Local Plan includes a county wide commitment to consider unmet needs arising from the SHMA jointly with the other Oxfordshire authorities. The agreement was reached through Oxfordshire's Spatial Planning and Infrastructure Partnership (SPIP) and includes the possibility of early Plan review if required. The agreement is to be supplemented by the Council in responding to the Inspector's advice provided at the Local Plan Hearings on 3 & 4 June 2014.

Reasonable Alternative to the Submission Local Plan: Housing Requirement of 1,140 dwellings per annum (2011-2031) which equates to 430 homes per annum more than the Submission Local Plan over the same period

Findings of the SA for the quantum of housing

- 1.44 The original SA appraised three alternatives for the quantum of housing (see Annex E of the SA Report), covering the period 2006 to 2031:
- The Proposed Growth Scenario: 670 dwellings per annum (annualised rate), giving a total of 16,750 dwellings over the plan period.
 - Alternative 1: 590 dwellings per annum (annualised rate), giving a total of 14,750 dwellings over the plan period.
 - Alternative 2: 800 dwellings per annum (annualised rate), giving a total of 20,000 dwellings over the plan period.
- 1.45 The original SA report recognised that:
- "At this high level of assessment it is inherently difficult to determine and predict the absolute environmental and sustainability impacts of alternatives, because several factors are not established such as the exact distribution, location and form of development. It is therefore more appropriate to consider the sustainability effects of alternatives relative to each other. An evaluation is made at the end of this report of the comparative merits of the alternative growth scenarios."*
- 1.46 In terms of significant effects, the original SA found that:

- The Proposed Growth Scenario and Alternative 2 would have significant positive effects with respect to the delivery of homes (SA objective 1), health and well-being (SA objective 3), reducing poverty and social exclusion (SA objective 4), and creating and sustaining vibrant communities (SA objective 6).
- The Proposed Growth Scenario and Alternative 2 would have significant negative effects with respect to improving efficiency in land use through the re-use of previously developed land and existing buildings (because of the scale of greenfield land that would be needed for development) (SA objective 8), reducing air pollution including reducing greenhouse gas emissions (due to emissions from increased housing and traffic) (SA objective 9), biodiversity (SA objective 10), landscape (SA objective 11), road congestion (SA objective 12), resource consumption (SA objective 13), and the generation of waste (SA objective 14).
- Alternative 1 was identified as having only minor effects, and no significant effects (whether positive or negative).

1.47 The original SA Report concluded:

"Although the Proposed Growth scenario and Alternative 2 score similarly within the SA, the proposed growth option delivers the most positive sustainability outcomes, providing sufficient housing to support the necessary economic growth in the district to 2031, while limiting environmental impacts as a result of less greenfield land being needed than under Alternative 2".

1.48 Although the objectively assessed housing need is now 1,140 dwellings per annum over the period 2011 to 2031, given past rates of construction, and pressure on the construction industry and house building companies to deliver significantly increased development across the country as a whole, this target will be a significant challenge to meet.

1.49 Assuming it is met, the significant effects identified for Alternative 2 under the original SA are most likely to result, except the effects are likely to be even more pronounced. Using similar assumptions to the original SA, this suggests the effects are likely to be as follows:

Significant positive effects

- Ensuring that everyone has the opportunity to live in a decent, sustainably constructed and affordable home (SA objective 1), because the quantum of housing will meet objectively housing need, and there will be greater opportunity to deliver the range of tenure and type of housing needed in the District.
- Improvement of health and well-being and reducing inequalities in health (SA objective 3) because access to a decent, sustainably constructed and affordable home has a major influence on household health, particularly the more vulnerable members of society.
- Reducing poverty and social exclusion (SA objective 4), for similar reasons as SA objective 3.
- Creating and sustaining vibrant communities (SA objective 6), because the additional development should help to deliver and generate demand for community facilities, services, shops, etc., and help to fund supporting infrastructure.

Significant negative effects

- Improving efficiency in land use through the re-use of previously developed land and existing buildings: although the higher level of development is likely to help bring brownfield land back into productive use, it will inevitably require significant greenfield development (SA objective 8).
- Reducing air pollution including reducing greenhouse gas emissions, due to emissions from increased housing and traffic (SA objective 9).
- Conserving and enhancing biodiversity (SA objective 10), because of the loss of habitats and disruption to ecological networks arising as a result of additional development, although there is likely to be significant scope for mitigation and habitat restoration and creation funded through development proposals.
- Landscape character (SA objective 11), for similar reasons to SA objective 8 and 10, although with the opportunity to mitigate the effects through choice of site and good design.

- Road congestion and pollution (SA objective 12), for the same reasons as SA objective 9, although new development may help to make some public transport services more viable, and also integrate walking and cycling into the design.
- Resource consumption (SA objective 13), and the generation of waste (SA objective 14), on the basis that the higher the levels of development the greater the resources needed to deliver and service it, and the greater the total amount of waste likely to be produced in the District.

1.50 There is a degree of uncertainty with the above conclusions given that it is high level and that the precise effects are best determined on a more detailed assessment of the specific locations where development would take place, and because of the measures that could be applied to avoid, mitigate or compensate for adverse effects arising. Not all locations where development could take place will give rise to the potential effects identified. Similarly, the additional development could be delivered in a variety of ways, such as through increasing densities on existing allocated sites, extensions to such sites, or the identification of new strategic locations for development. The effects are also dependent upon the relationship with jobs and employment land provided for in the Local Plan. For example, residential developments that are well located to sources of employment are less likely to lead to significant effects on traffic generation and congestion (together with associated air pollution and greenhouse gas emissions) than those that are not.

Quantum of jobs and employment land: Reasons for selecting reasonable alternatives for jobs and employment land

- 1.51 An updating addendum to the Cherwell Economic Analysis Study was commissioned by the Council in June 2014 to ensure that further consideration is given to the Strategic Housing Market Assessment **and associated Economic Forecasting work following the Inspector's decision** that the Local Plan should be based on the Oxfordshire Strategic Housing Market Assessment.
- 1.52 The Council is seeking to meet its objectively assessed needs in full, maintain a pro-growth **approach to economic development while maintaining the Local Plan's** overall vision and strategy including addressing the issues of out-commuting and the **'imbalance' between homes and jobs at Bicester.**
- 1.53 The employment trajectory indicates that of the total land allocated, 235 hectares (gross) is expected to provide for employment uses within the Plan period 2011 to 2031, some 80 hectares (gross) more than in the Submission Local Plan. The evidence suggests that the reasonable alternative to the Submission Local Plan is to allocate more employment land at Banbury and Bicester. These sites will generate approximately 23,000 jobs on B use class land and further jobs will generated through other means such as retail and home working.

Reasonable Alternative to the Submission Local Plan: To allow for additional employment land at Banbury and Bicester to accommodate the jobs forecasts and employment land need identified in the economic studies for the extended plan period up to 2031.

Findings of the SA for the quantum of jobs and employment land

1.54 At the strategic level, the effects of providing for additional employment land are likely to be similar to the effects of providing for a higher quantum of housing. The assumptions that underpinned the appraisal of the SA of the quantum of housing are also relevant to the SA of the quantum of employment land.

Significant positive effects

- Ensuring high and stable levels of employment are achieved (SA objective 17), through the providing of enough employment land to meet the predicted need, although this is also heavily dependent upon the global and national economy.
- Sustaining and developing economic growth and innovation and support the long term competitiveness of the District (SA objective 18), although this is also dependent upon the type of economic activity and the measures put in place by businesses.
- Improvement of health and well-being and reduce inequalities in health (SA objective 3) because access to employment has a major influence on health.

- Reducing positive and social exclusion (SA objective 4), for similar reasons as SA objective 3.
- Creating and sustaining vibrant communities (SA objective 6), because the additional employment development should help to deliver jobs and incomes which will help to support community services and facilities, shops, etc. and help to fund supporting infrastructure.

Significant negative effects

- Improving efficiency in land use through the re-use of previously developed land and existing buildings – although the higher level of employment land is likely to help bring brownfield land back into productive use, it will inevitably require significant greenfield development (SA objective 8).
- Reducing air pollution including reducing greenhouse gas emissions, due to emissions from increased traffic generated by businesses setting up on the employment land, including commuting (SA objective 9).
- Conserving and enhancing biodiversity (SA objective 10), because of the loss of habitats and disruption to ecological networks arising as a result of additional employment development, although there is likely to be significant scope for mitigation and habitat restoration and creation funded through development proposals.
- Landscape character (SA objective 11), for similar reasons to SA objective 8 and 10, although with the opportunity to mitigate the effects through choice of site and good design.
- Road congestion and pollution (SA objective 12), for the same reasons as SA objective 9, although new employment development may help to make some public transport services more viable, and also integrate walking and cycling into the design.
- Resource consumption (SA objective 13), and the generation of waste (SA objective 14), on the basis that the higher the levels of employment development the greater the resources needed to deliver and service it, and the greater the total amount of waste likely to be produced in the District.

1.55 As with the SA of the quantum of housing, there is a degree of uncertainty with the above conclusions given that it is at a high level and that the precise effects are best determined on a more detailed assessment of the precise locations where development would take place, and because of the measures that could be applied to avoid, mitigate or compensate for adverse effects arising. Not all locations where employment development could take place will give rise to the potential effects identified.

1.56 The effects are also dependent upon the relationship with housing provided for in the Local Plan. For example, residential developments that are well located to sources of employment are less likely to lead to significant effects on traffic generation and congestion (together with associated air pollution and greenhouse gas emissions) than those that are not.

Appraisal of overall spatial distribution of additional development

1.57 The SA of the overall spatial distribution of development for delivering the additional housing and employment related needs is described below.

1.58 The appraisal of reasonable alternatives is within the context of the overall spatial strategy set out in the submitted Local Plan, which precludes the strategic release of Green Belt land (other than meeting specific employment needs at Kidlington/Begbroke). The SA work for this Addendum draws upon the work undertaken for the original SA of the Submission Local Plan, but takes into account the additional development identified as being needed in the light of new evidence over the Local Plan period to 2031.

1.59 The objectively assessed need as identified in the 2014 SHMA is 1,140 homes per annum from 2011-2031, or a total requirement of 22,800 homes. Taking into account completions, homes with planning permission, and strategic sites (not permitted) identified in the Submission Local Plan, there remains about 8,994 homes to distribute across the District. Some provision for additional employment land may be needed.

1.60 The spatial strategy in the Submission Local Plan (para A.11) is as follows:

- Most of the growth in the District to locations within or immediately adjoining the main towns of Banbury and Bicester. Bicester will continue to grow as the main location for development within the District within the context of wider drivers for growth. Banbury will continue to grow, albeit to a lesser extent than Bicester, in accordance with its status as a market town with a rural hinterland.
- Away from the two towns, the major single location for growth will be at the former RAF Upper Heyford base which will deliver over 760 homes in accordance with its planning permission.
- **Kidlington's centre will be strengthened and its important economic role will be widened.** Economic development will be supported close to the airport and nearby at Begbroke Science Park. There will be no strategic housing growth at Kidlington but other housing opportunities will be provided.
- Growth across the rest of the District will be much more limited and will focus on meeting local community and business needs. It will be directed towards the larger and more sustainable villages within the District which offer a wider range of services and are well connected to major urban areas, particularly by public transport.
- Development in the open countryside will be strictly controlled. In the south of the District, the existing Green Belt will be maintained, though a small scale local review of the Green Belt will be conducted to accommodate identified employment needs. In the north west of the District, the small area lying within the Cotswolds Area of Outstanding Natural Beauty will similarly be protected.

Reasons for selecting the reasonable alternatives

1.61 Given that the current consideration of **additional growth is to meet Cherwell's objectively assessed need only**, it was considered that the reasonable alternatives for accommodating the additional growth required should be appraised within the overall framework of the Spatial Strategy as set out in the Submission Local Plan.

1.62 The two towns in the District provide access to employment opportunities, services and facilities and the potential for additional infrastructure building on existing provisions. Former RAF Upper Heyford is an extensive previously developed site where a new settlement including a new school has been approved and is under construction. Although additional development in these locations could have economic, social and environmental impacts, they are reasonable locations in the District at which to consider additional growth.

1.63 Some additional development in rural areas could help sustain services and facilities and in some cases possibly increase the attractiveness of villages for new services and facilities. Not providing any additional development in rural areas, or providing very low levels of development, would not help meet the identified housing need in rural areas and would undermine the sustainability of rural communities generally.

1.64 In view of national planning guidance and the existence of other non-Green Belt options at Bicester, Banbury, Former RAF Upper Heyford and elsewhere in the rural areas, it was considered that there is no necessity for an immediate strategic review of the extent/boundaries of the Oxford Green Belt in the District to meet Cherwell's additional housing requirement. Any future review of the Plan will require the cooperation of all authorities in Oxfordshire to meet the **County's total housing need arising from the need assessed in the 2014 SHMA**. This will include catering for the housing needs of Oxford City. A strategic Green Belt review is one of a number of **options to consider in meeting the County's overall housing needs**. All local authorities in Oxfordshire are working jointly to take forward the conclusions of the new Oxfordshire SHMA and the outcome of this joint work may lead to a strategic Green Belt review.

1.65 Therefore, it was considered that the following reasonable alternatives for accommodating the additional growth, in spatial strategy terms, should be considered in the SA Addendum:

Option A. Focus additional growth at Bicester.

Option B: Focus additional growth at Banbury.

Option C: Focus additional growth at Former RAF Upper Heyford.

Option D: Provide for some additional growth in the Rural Areas.

- 1.66 The SA Addendum only considered growth in addition to the proposed development that is already included in the Submission Local Plan. The proposed development in the Submission Local Plan has already been subject to SA.

Findings of the SA

- 1.67 Each of the four reasonable alternative options was appraised against the 19 SA objectives. The findings are summarised below in the form of a commentary to draw out the sustainability advantages and disadvantages for each reasonable alternative option in order to reach some conclusions about the most sustainable way to accommodate the additional development needed in the District.

Focusing additional growth at Bicester

- 1.68 Bicester is the smaller of the two main towns in Cherwell District, and it is the one that is closest to, and most influenced by, Oxford. It has experienced rapid growth over recent decades and as a result has had to address the challenges of providing sufficient services and facilities, including open space, for the expanding population, as well as increased traffic congestion. The town experiences net out-commuting, with Junction 9 of the M40 in close proximity to the south-west of the town, and the A34 leading into Oxford. Providing jobs that cater for the needs of residents will be important to achieve a better balance, and also to address deprivation issues that characterise some neighbourhoods in the town.
- 1.69 As an existing service centre and the second largest town in the District, there are significant sustainability advantages in focusing additional growth at Bicester. Apart from meeting housing need, additional development would help to deliver the services, facilities, jobs and infrastructure to sustain the town and help it to make the move towards being of a critical size where it has the potential to become less influenced by its larger neighbour in Oxford, and also larger settlements beyond, including London.
- 1.70 **The town's employment areas and town centre are well located with respect to residential areas,** offering opportunities for access without having to use the car, and additional growth is capable of reinforcing this balanced pattern. Nonetheless, additional traffic would be generated, with associated air pollution and greenhouse gas emissions.
- 1.71 Any large scale additional development would inevitably have to be on greenfield land, including potentially best and most versatile agricultural land. The town is perhaps less constrained than Banbury in terms of its landscape sensitivity and capacity, although this is not to suggest that there would not be landscape impacts from peripheral development. Bicester and its surrounding area has significant heritage interest, particularly to the north-east and the south-west including Chesterton village, the former airfield of RAF Bicester, the village of Stratton Audley, Wretchwick deserted medieval settlement, and Alchester Roman site. Additional development in these locations could have a significant impact on their historic character and setting.
- 1.72 There are ecological networks and pockets of ecological interest around Bicester, some of which is quite extensive to the north and east, although there is less obvious ecological interest elsewhere. Bicester is constrained by flood zones associated with the River Bure, which flooded as recently as 2013. However, there are large areas around the town without significant flood risk suggesting that there is scope to develop without significantly increasing flood risk to property.

Focusing additional growth at Banbury

- 1.73 Banbury is the largest town in Cherwell District. It is also more isolated than Bicester, and is therefore less influenced by Oxford and other larger settlements. It is of sub-regional importance, and has achieved a better balance than Bicester in terms of its economy, jobs, homes, services and facilities. Given the character and relatively balanced (albeit significant) growth of Banbury over the years, there is the potential for further growth to reinforce these characteristics, and at the same time seek to address deprivation issues that are experienced in some wards.
- 1.74 Over recent years Banbury has become influenced by the opening of the M40, reducing its isolation and enabling commuting elsewhere, but, at the same time, attracting economic

development to the town. The majority of the employment areas of the town are located to the north and east of the town centre on the side of Banbury where there is access to the M40 at Junction 11. For example, there are large strategic employment sites around Grimsbury to the east of the railway which, before the M40 was built, tended to define the eastern boundary of the town.

- 1.75 With the exception of housing associated with Grimsbury, the majority of residential development is in a north-south arc to the west of the town centre, meaning that the major employment areas are not well located for access by walking and other more sustainable modes of transport. However, locating new residential development on the eastern side of the town beyond the M40 Motorway to the east would be lead to development in an inaccessible location resulting from the severance of homes from the rest of the town. Banbury is the only location in the District where an AQMA is designated (along the A422 at Hennef Way, which links the town with the M40). The current configuration of the town, plus additional development, is likely to increase traffic and associated air pollution and greenhouse gas emissions.
- 1.76 Banbury does have some significant constraints to growth, including its topography. Additional development would be likely to lead to significant adverse effects if it were to take place on higher and more prominent land to the north and west of the town.
- 1.77 To the east of the town, the River Cherwell is associated with flood risk zones and flooding events although an Environment Agency flood alleviation scheme was introduced in 2012 to reduce this risk. It nonetheless forms an important landscape and ecological corridor that could be affected by inappropriate additional development. Although, there is ecological interest elsewhere around Banbury, much of the area immediately adjoining the urban boundary does not have significant interest, which suggests that development could be accommodated without significant adverse effects occurring on biodiversity. Given that additional development would be likely to be greenfield land, there is likely to be a loss of best and most versatile agricultural land.
- 1.78 Banbury also has significant historic interest, both associated with the town centre, and with land and settlements in close proximity to the town such as Hanwell, Wroxton (associated with Wroxton Abbey), Broughton (castle and park) and Adderbury, as well as several undeveloped areas surrounding the town that have heritage interest. It is unlikely that significant additional housing development could take place without having some significant effects, albeit indirect, such as on setting.

Focusing additional growth at Former RAF Upper Heyford

- 1.79 Former RAF Upper Heyford is a large site of approximately 500 hectares. It already has both residential and employment uses, and therefore there is an existing community which could act as the foundations for a larger settlement. The site already has planning consent for more than 1,000 additional dwellings (gross) and necessary supporting infrastructure, community and recreational facilities and employment opportunities, and the site was allocated in the Submission Local Plan (Policy Villages 5) as a means of securing the delivery of a lasting arrangement on the site.
- 1.80 Providing for additional development would further reinforce its character and function as a settlement in its own right, able to support a growing range of community services and facilities. However, these are unlikely to be on the scale of Banbury and Bicester suggesting that residents would still need to travel to these towns, and to Oxford, to meet all their needs. This could result in additional traffic and associated air pollution and greenhouse gas emissions.
- 1.81 Although previously developed, the site is of particular heritage interest, which is reflected in the whole airfield being designated as a Conservation Area. There is also heritage interest nearby associated with the villages of Upper Heyford, Lower Heyford, Fritwell, and Ardley, the Rousham, Lower Heyford and Upper Heyford Conservation Area (Rousham being a Grade I listed Park and Garden), and the Oxford Canal Conservation Area. Additional development at Former RAF Upper Heyford has the potential to have a significant adverse effect on heritage, subject to design and mitigation considerations.
- 1.82 The site also has ecological interest, because of calcareous grassland, although a new development could offer opportunities to conserve the nature conservation interest as part of a management plan for the development proposals as a whole. The landscape of Former RAF Upper Heyford as a whole is considered to have medium or low capacity for additional development

although parts of the site have the potential for development. The former airfield is not associated with flood risk.

Providing for some additional growth in the Rural Areas

- 1.83 With the exception of Kidlington, which is in the Green Belt, there are no large villages offering a wide range of services in the District. The villages tend to be characterised by a lack of affordable housing, out-commuting, and diminishing range of services. They nonetheless remain as very attractive places in which to live.
- 1.84 Kidlington is the smallest of the three urban areas in Cherwell District and an important employment location positioned in the Oxford Cambridge Arc. There are science and innovation industries close by at Begbroke Science Park and a significant commercial focus at Langford Lane next to London-Oxford Airport. In addition to being a key employment location for the District, the area has connections with the Oxford economy and has growth potential. The Local Plan supports a small scale review of the Green Belt to support local economic growth to be undertaken in Local Plan Part 2 and informed by work currently being undertaken in the Kidlington Framework Masterplan.
- 1.85 Providing for some additional development in the Rural Areas would help to cater for both demand and need. It would assist in providing local demand for local services, making them more viable, although it is likely that access will still be sought in the larger settlements, including Banbury, Bicester and Oxford, with associated traffic movements, air pollution and greenhouse gas emissions.
- 1.86 The Rural Areas are characterised by a patchwork of ecological interest, best and most versatile agricultural land, flood risk zones, and heritage interest, which give the villages and their surroundings their character. There will be opportunities to provide for additional development that avoids this interest, so long as the scale is commensurate with the villages concerned. It is unlikely that the Rural Areas could accommodate large scale development without significant effects on landscape character. A larger number of smaller developments are less likely to have localised effects, but the cumulative impacts are likely to be more noticeable, for example with respect to traffic on the rural roads. Small scale development is less likely to be able to deliver associated contributions to community services and facilities.

Conclusion

- 1.87 None of the reasonable alternative options shows significant sustainability advantages over the others:
- Banbury is the largest town in the District, with the greatest range of jobs, services and facilities, but it is constrained topographically, and by other environmental issues, which suggests that it can accommodate some of the additional growth but not too big a proportion.
 - Bicester is less constrained than Banbury, although it still has significant constraints such as heritage interest and best and most versatile agricultural land. Additional development may help the town achieve more of a critical size in terms of providing for a good range of services and facilities, but too rapid or too large a scale of growth could place the services, facilities and infrastructure of the town under strain.
 - Former RAF Upper Heyford is already a growing community with both homes and jobs, which could benefit from further growth in order to reach a size that allows residents to access services and facilities locally rather than having to travel elsewhere. However, significant additional development could compromise the heritage and ecological interest of the site if not carefully planned and designed.
 - The villages of the Rural Areas need more homes and jobs to cater for both demand and need, and also to help provide support for the diminishing range of local services and facilities that they offer. However, people will continue to need to access larger settlements, such as Banbury, Bicester and Oxford, to meet their everyday needs and employment, so large-scale development in the Rural Areas is probably not sustainable and would harm landscape character.
- 1.88 The most sustainable solution is likely to be a balanced approach between all four of the reasonable alternative options, focusing initially on the two main towns particularly Bicester as it

is less constrained than Banbury despite its smaller size, and then exploring the scope to deliver additional development at Former RAF Upper Heyford whilst respecting its heritage and ecological interest, and allowing for some additional development in the Rural Areas, but on a limited scale commensurate with the size, character and function of the villages concerned. This is reinforced by the economic analysis undertaken for the Council **which shows that the Council's proposed** modifications are well aligned in terms of the location of new housing and jobs and consistent with this approach. This would probably provide the greatest chance for the potential positive effects to be realised and to manage any potentially significant adverse effects. To place too much emphasis on any one option would increase the risks of failing to deliver the positive effects, whilst increasing the likelihood of significant adverse effects occurring.

- 1.89 This approach is reflected in revised Policy BSC1: District Wide Housing Distribution, which provides for 44% of housing growth (including completions, permissions, allocations and allowance for windfalls) to be in and around Bicester, 32% around Banbury, and 24% in the remainder of the District (of which nearly half will be at Former RAF Upper Heyford in accordance with the proposed Main Modifications to Policy Villages 5).

Appraisal of additional strategic development locations

- 1.90 The SA of the reasonable alternative strategic development locations for accommodating the additional housing and employment needs identified as being needed in the Borough for the extended Local Plan period until 2031 is described below. It builds upon the work undertaken for the original SA of the Submission Local Plan.
- 1.91 The reasonable alternative strategic development locations accord with the overall spatial strategy in the Submission Local Plan, which focuses development on the two main towns of Bicester and Banbury, plus provision for strategic development at Former RAF Upper Heyford. Potential strategic development locations that did not accord with the overall spatial strategy, including strategic development in rural areas or through the strategic release of Green Belt land were not considered to be reasonable alternatives.
- 1.92 The 2013 SA Report that accompanied the Submission Local Plan appraised both strategic development locations that were included in the plan, and strategic development locations that were not included, but were considered to be reasonable alternatives (set out in Annex C of the 2013 SA Report).
- 1.93 The SA work on strategic development locations for the SA Addendum has drawn on the SA work that has already been undertaken, and sought to be consistent in the appraisal judgements and findings. The following general principles were applied to identifying the reasonable alternatives for strategic development locations to accommodate the additional development required for the District.

Strategic Development Location principles for identifying reasonable alternatives to be subject to SA:

- Further consideration of those reasonable alternative strategic development locations that were discounted for the Submission Local Plan, but which may now be required in order to deliver the increased level of growth needed in Cherwell District.
- Appraisal of new reasonable alternative strategic development locations that have not been subject to SA to date.
- Intensification of existing strategic development locations included in the Submission Local Plan, for example by increasing the density of development.
- Extensions to the land covered by the existing strategic development locations so that they are of a larger size.

Reasons for selecting the reasonable alternatives

- 1.94 In order to identify the reasonable alternative strategic development locations, Cherwell District Council provided LUC with the full list of potential housing and employment site options that have

been put forward through the Strategic Housing Land Availability Assessment process, and the most recent call for sites undertaken from 13 June - 27 June 2014.

- 1.95 In accordance with the Spatial Strategy in the Submission Local Plan, only sites within or around Banbury, Bicester and Upper Heyford were considered for the strategic development location options. This resulted in 179 sites, and from this list, only sites 3 hectares or larger were **considered to be suitable as 'strategic' development locations**, which should be able to provide at least 100 homes.
- 1.96 A small number of sites did not fully comply with 'reasonableness' criteria as they either included some areas of high flood risk within the site boundary and/or included or are close to one or more designated heritage assets or a Site of Special Scientific Interest (SSSI). Cherwell District Council also advised that a number of the sites 3 ha or larger identified through the Strategic Housing Land Availability Assessment did not need to be subject to SA as they are no longer available due to reasons such as already gaining planning permission.
- 1.97 Note that there are some sites that had been considered at earlier stages in the plan preparation, some of which were allocated in the Submission Local Plan, where neither CDC nor any developers/site owners are proposing material changes to the sites. These sites have not been subject to a full re-appraisal as nothing new is being considered for these sites.

Approach to the appraisal

- 1.98 Each reasonable alternative strategic development location was appraised against the SA Framework. Where the reasonable alternative strategic development locations were already appraised within Annex C of the original 2013 SA Report, the relevant matrices were used as a starting point for the re-appraisal of these same locations as potential options for locating the additional housing now required for the District. If no relevant appraisal matrix was prepared for a site in the 2013 SA Report, LUC prepared a new appraisal matrix but in both instances, LUC tried as much as possible to take a consistent approach to the way sites were appraised in Annex C of the 2013 SA Report.
- 1.99 Following the consultation on the Proposed Main Modifications and the Draft SA Addendum (August 2014), a number of edits were made to the appraisal matrices to address minor inconsistencies between site appraisals. In a few places, these edits resulted in changes to SA scores. These revised scores have been amended where relevant in **Tables 2 to 6**.

Findings of the SA

- 1.100 The findings are summarised by town starting with Banbury, then Bicester and Former RAF Upper Heyford. Tables are presented summarising the SA scores for each SA objective for each reasonable alternative, showing where sites would be considered to result in significant effects (whether positive or negative) as well as more minor or uncertain effects.
- 1.101 It should be noted that, although the Submission Local Plan provided more detail on the delivery of some of these strategic development locations, and some of the stakeholders promoting alternative sites provided their own detailed assessments and proposals, all the sites were **appraised on the same 'policy-neutral' basis. This was in order to ensure that all reasonable alternatives for locating the additional development required were appraised in a consistent and systematic manner in line with the original SA.**

Reasonable alternatives for strategic housing development at Banbury

- 1.102 A map of all the reasonable alternative strategic housing development locations that have been considered at Banbury is shown in **Figure 1**. The predicted effects for each SA objective for Banbury are summarised in **Table 2**. Note that **Table 2** includes residential sites and some mixed use sites where a residential element has been proposed. Note that neither Cherwell District Council nor any developers/site owners are proposing changes to the sites highlighted in pale green in the top row of Table 2, therefore, the SA scores from the assessment of those sites undertaken in the 2013 SA Report (Annex C) have been re-presented in this table.

Significant effects

- 1.103 A number of **potential significant positive effects** were identified in relation to eight of the SA objectives. All of the sites would make a positive contribution to the new District housing requirement and therefore have a positive effect on SA objective 1 (**provision of homes**), but eleven out of the 20 sites appraised would have a significant positive effect, as they would be more likely to make a significant contribution to the new District housing requirements by providing more than 400 homes. Six of those same eleven sites and two others would also have a significant positive on SA objective 7 (**accessibility to facilities and services**), either because they are close to the town centre (e.g. Banbury 1 Canalside and Banbury 8) and/or they are large enough to ensure that a number of new facilities and services would be provided as part of the new development.
- 1.104 One site that was appraised in the 2013 SA Report (Banbury 10: Bretch Hill Regeneration Area) was found to have a significant positive effect on SA objective 5 (**reducing crime**) as it would help improve the satisfaction of people with their neighbourhoods and would have a positive impact in relation to reducing crime and the fear of crime. The Banbury 10: Bretch Hill Regeneration Area site was also found to have a significant positive effect on SA objective 6 (**vibrant communities**) because it would provide the opportunity to improve residential amenity and sense of place and improve satisfaction of people with their neighbourhoods.
- 1.105 The five sites within the existing urban area are identified as having a significant positive effect on SA objective 8 (**efficient use of land**) as they are brownfield sites that would be re-developed, rather than the remaining sites around the edge of Banbury, which are all greenfield sites.
- 1.106 Four sites (Banbury 1/BA300, Banbury 8/BA316 BA317 and Southam Road) are identified as having significant positive effects on SA objective 9 (**air quality**), as there is potential for good connectivity given their locations and range of existing, uses nearby, which would limit the need to travel.
- 1.107 In relation to SA objective 12 (**reducing road congestion and pollution**), four sites within or near to the town centre (Banbury 8, Banbury 1/BA300, BA317 and Southam Road) scored a significant positive effect due to the potential to help to reduce distances to travel to work and would encourage use of sustainable transport modes such as walking, cycling and public transport. The same four sites (Banbury 8, Banbury 1/BA300, BA317 and Southam Road) are identified as likely to have a minor positive effect on SA objective 9 (**air quality**) as their location close to or within the town centre, would be likely to promote walking and cycling and reduce the need to travel, and there is potential for good connectivity given the proximity to Banbury railway station and the range of existing, uses nearby, which would limit the need to travel.
- 1.108 Finally, five of the alternatives (Banbury 2 extension/BA311, Banbury 2 intensification/BA310, BAN 4/BA66, Land at Crouch Farm/BA308 and BAN 9/BA312) are likely to have significant positive effects on SA objectives 17 (**employment levels**) and 18 (**economic growth**) because they are large enough that the residential development planned within the site would require new community facilities and local services, all of which will generate long term employment and training opportunities in the area, in addition to construction of the site, which would create a significant number of jobs in the short to medium term.
- 1.109 **Significant negative effects** were only identified in relation to two SA objectives: 8 (**efficient use of land**) due to 14 of the sites being greenfield land, and SA objective 11 (**landscape and heritage**) due to eight of the sites having low or low-medium capacity to accommodate development in terms of landscape and visual sensitivity and/or the potential to adversely affect one or more heritage assets within or near the site. These six sites are clustered in the north (Banbury 2/BA311, Banbury 2/BA310 and BA312), west (BA360, BA87 and BA69) and south west (BA308 and BA66) of Banbury where landscape capacity has been assessed as low or medium-low.

Table 2: Summary of SA Scores for reasonable alternative strategic residential/mixed use development locations at Banbury

SA objective	Banbury 1 (BA300 - Reduction)	Banbury 2 (BA311 - Land West of Southam Road, including BA359)	Banbury 2 (BA310 - Intensification)	Banbury 3 (BA98)	Banbury 4 & 12 Extension (BA341, BA373 & BA374)	Banbury 5 (BA356)	Banbury 8 (BA316)	BAN 4 (BA66, including BA362, BA 368, BA369, BA370))	Land at Crouch Farm (BA308 including BA366)	Land at Crouch Hill (BA69, including BA365 and BA378)	BAN9 (BA312, including BA367)	NEW (BO22)	NEW (BA317 - Land at Higham Way (Grundons and Cemex))	NEW (BA87, including BA377)	NEW (BA363)	NEW (Southam Rd Retail Park - residential use)	NEW (BA360)	NEW (BA343, including BA371)	NEW (BA361)
1. Homes	++	++	+	++	++	++	+	++	++	++	++	+	+	+	+	++	+	+	++
2. Flooding	0	0	-	0	0	0	0	0	0	0	0	0	0	0	-	0	0	0	0
3. Health and well-being	+	+	+	+	+	+	0	+	+	+	+	+	+	+	+	+	+	+	+
4. Poverty and social exclusion.	+	?	?	+	+	+	+	+	+	+	+	+	+	+	+	+	?	+	+
5. Crime	+	?	?	?	?	?	+	?	?	?	?	?	+	?	+	+	?	?	?
6. Vibrant communities	?	?	?	?	?	?	?	?	?	?	?	?	-	?	?	?	?	?	?
7. Accessibility	++	++	++	+	+	+	++	++	++	+	++	+	+	+	+	++	?	+	+
8. Efficient land use	++	--	--	--	--	--	++	--	--	--	--	--	++	--	-	++	--	--	--
9. Air quality	++	?	?	?	+	?	++	?	?	?	?	+	++	?	?	++	?	?	?
10. Biodiversity	+	+	+	+	+	+	+	-	-	-	-	+	+	+	+	+	+	+	+
11. Landscape and heritage	+	--	--	-	+	-	-	--	--	--	--	+	+	--	+	+	--	-	-
12. Road traffic	++	?	?	?	+	?	++	?	?	?	?	+	++	?	?	++	?	?	?
13. Resource use	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?

SA objective	Banbury 1 (BA300 - Reduction)	Banbury 2 (BA311 – Land West of Southam Road, including BA359)	Banbury 2 (BA310 - Intensification)	Banbury 3 (BA98)	Banbury 4 & 12 Extension (BA341, BA373 & BA374)	Banbury 5 (BA356)	Banbury 8 (BA316)	BAN 4 (BA66, including BA362, BA 368, BA369, BA370))	Land at Crouch Farm (BA308 including BA366)	Land at Crouch Hill (BA69, including BA365 and BA378)	BAN9 (BA312, including BA367)	NEW (BO22)	NEW (BA317 - Land at Higham Way (Grundons and Cemex))	NEW (BA87, including BA377)	NEW (BA363)	NEW (Southam Rd Retail Park – residential use)	NEW (BA360)	NEW (BA343, including BA371)	NEW (BA361)
14. Waste	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?
15. Water quality and quantity	0	0	0	0	0	0	0	0	0	?	?	0	0	?	?	0	?	?	?
16. Energy efficiency	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?
17. Employment levels	+	++	++	+	+	+	+	++	++	+	++	+	+	+	+	+	+	+	+
18. Economic growth	+	++	++	+	+	+	+	++	++	+	++	+	+	+	+	0	+	+	+
19. Tourism	+	0	0	0	+	0	+	0	0	0	0	0	+	0	0	+	0	0	0

Reasonable alternatives for strategic employment development at Banbury

- 1.110 Reasonable alternative strategic employment development locations were also considered at Banbury, as shown in **Figure 1**. The appraisal matrices for each site are presented in **Table 3**. All of the sites are either near the town centre or around the eastern edge of Banbury, along the M40 and adjacent to existing employment locations.

Significant effects

- 1.111 Two of the reasonable alternative strategic employment development locations (Southam Road, and Area near Junction 11) would have **potential significant positive effects**. Southam Road would be likely to have significant positive effects on SA objectives 7 (**access**), 8 (**efficient use of land**) due to its proximity to the town centre and existing facilities, and being a brownfield site, and also on SA objectives 9 (**air quality**) and 12 (**road traffic**) as the site would help to promote sustainable transport as it is close to the town centre and Banbury railway station. Southam Road would also be likely to have significant positive effects on SA objective 12 (Area near Junction 11 would have significant positive effects on SA objectives 17 (**employment levels**) and 18 (**economic growth**) because it is a large site and would generate long term employment and training opportunities in the area, in addition to construction of the sites, which would create a significant number of jobs in the short to medium term. All other sites would also contribute to employment opportunities but on a smaller scale.
- 1.112 Only two of the reasonable alternative strategic employment development locations (Land East of the M40 and the Area near Junction 11) would have a **potential significant negative effect**, both on SA objective 8 (**efficient use of land**) as they are both large greenfield sites. While none of the sites are likely to have a significant negative effect on landscape character, the minor negative effect identified for Area near Junction 11 is uncertain, because while it is assessed as having medium potential for limited commercial/light industrial development located on the lower lying land adjacent to the A361 the LSCA highlighted that it would be beneficial in landscape and visual terms if development was prevented from encroaching on the valley sides.⁴ In addition, development of the Area near Junction 11 could have a significant effect in that it breaches the 'boundary' to the expansion of Banbury eastwards previously demarcated by the M40.

⁴ WYG (July 2014) Banbury *Landscape Sensitivity and Capacity Assessment, Final Draft*

Table 3: Summary of SA Scores for reasonable alternative strategic employment development locations at Banbury

SA objective	Banbury 6 (Land to west of M40 - Extension)	BAN 7 (Land East of the M40)	NEW (Area near Junction 11)	NEW (Land adjacent to Power Park Ltd – Rail infrastructure)	NEW (Southam Rd Retail Park – retail with commercial uses)
1. Homes	0	0	0	0	0
2. Flooding	-	-	-	-	0
3. Health and well-being	?	?	?	0	?
4. Poverty and social exclusion	?	+	?	0	?
5. Crime	?	?	?	+	+
6. Vibrant communities	?	?	?	?	?
7. Accessibility	+	-	-	+	++
8. Efficient land use	-	--	--	0	++
9. Air quality	+	?	?	+	++
10. Biodiversity	+	+	+	+	+
11. Landscape and heritage	+	+	-?	-	+
12. Road traffic	+	?	?	+	++
13. Resource use	?	?	?	?	?
14. Waste	?	?	?	?	?
15. Water quality and quantity	-	-	0	0	0

SA objective	Banbury 6 (Land to west of M40 - Extension)	BAN 7 (Land East of the M40)	NEW (Area near Junction 11)	NEW (Land adjacent to Power Park Ltd – Rail infrastructure)	NEW (Southam Rd Retail Park – retail with commercial uses)
16. Energy efficiency	?	?	?	?	?
17. Employment levels	+	+	++	+	+
18. Economic growth	+	+	++	+	+
19. Tourism	0	0	0	0	+

Reasonable alternatives for strategic housing development at Bicester

- 1.113 A map of all the reasonable alternative strategic housing development locations that have been considered at Bicester is shown in **Figure 2**. The predicted effects for each SA objective for each of the reasonable housing sites are summarised in **Table 4**.

Significant effects

- 1.114 A number of **potential significant positive effects** were identified in relation to eight of the SA objectives. All of the sites would make a positive contribution to the new District housing requirement and therefore have a positive effect on SA objective 1 (**provision of homes**), but 12 out of the 16 sites appraised would have a significant positive effect, as they would be more likely to make a significant contribution to the new District housing requirements by providing more than 400 homes.
- 1.115 Six of the sites are likely to have a **significant positive effect** on SA objective 7 (**accessibility to facilities and services**), either because they are close to the town centre (e.g. BI48 and BI19) and/or they are large enough to ensure that a number of new facilities and services would be provided as part of the new development. However, one site that was appraised in the 2013 SA Report (BIC 7/CV1) is likely to have a **significant negative effect** on this objective because the site is located to the north of Caversfield which is a village with limited services and facilities to accommodate a strategic site allocation.
- 1.116 Two of the site options (Bicester 8/BI5, and BI19) are likely to have a **significant positive effects** on SA objective 8 (**land use**) as there are previously developed sites. However, **potential significant negative effects** have been identified for most of the other site options because they are on greenfield land and comprise at least some high quality agricultural land (e.g. Grade 3 or above). A minor rather than significant negative effect is likely for three sites including: BI31 and CH15 as, although BI31 is a greenfield site, the land is relatively poor quality (Grade 4 agricultural land), whereas the majority of the CH15 is currently not previously developed and the site is within Grade 4 agricultural land. Alternatively, site ST2 comprises an area of former quarrying with land that is being naturally regenerated with pioneer species and the regenerated land can be just as important as greenfield.
- 1.117 One site (ST2) is likely to have a **significant negative effect** on SA objective 7 (**accessibility to facilities and services**) as the site is approximately 2.5 - 3 km north of Bicester and is physically separate from Bicester and from Caversfield, and is also separate from the village of Stratton Audley. Therefore, even though development of the site could provide some new services and facilities, most new residents are likely to be dependent on private cars to access existing facilities in the town.
- 1.118 Three sites (BI31, BI48 and BI19) are likely to have a **significant positive effect** on SA objectives 9 (**air quality**) and 12 (**transport**) as the sites would provide relatively easy access to services and facilities, including via existing sustainable transport links. The sites' location and range of uses in the area could help reduce the distance to travel to work and enable the use of sustainable transport modes.
- 1.119 Four of the site options (Bicester 12/BI2, BIC 11/, BI31 and ST2) could have a **significant negative effect** on SA objective 10 (**biodiversity**) as there are known biodiversity features within close proximity of the sites that could be affected by development. Two of these sites (BIC 11 and ST2) as well as BIC 5/BI212, could also have a significant negative effect on SA objective 11 (**landscape and heritage**) as they are within close proximity of heritage features that could also be affected by development.
- 1.120 One site, Bicester 1/BI200, could have a **significant positive effect** on SA objective 16 (**energy efficiency**) as the site would be large in size and could accommodate a district heating system. The implementation of community renewable energy generating systems would also be possible.
- 1.121 Finally, eight of the alternatives (Bicester 1/BI200, Bicester 2/BI201, Bicester8/BI5, Bicester 12/BI2, BIC 7/CV1, BIC 10, AM013 and BIC 11) are likely to **have significant positive effects** on SA objectives 17 (**employment levels**) and 18 (**economic growth**) because they are large enough that the residential development planned within the site would require new community facilities and local services, all of which will generate long term employment and training

opportunities in the area, in addition to construction of the site, which would create a significant number of jobs in the short to medium term.

Table 4: Summary of SA Scores for reasonable alternative strategic residential/mixed use development locations at Bicester

SA objective	Bicester 1 (BI200 – extension and intensification)	Bicester 2 (BI201 – extension into BI211 or BI222)	Bicester 3 (BI44)	Bicester 8 (BI5)	Bicester 12 (BI2 – extension & intensification)	BIC 5 (BI212)	BIC 7 (CV001 Dymocks Farm)	BIC 10 (Land east of Chesterton)	BIC 11 (Bignell Park)	BI31 (Land North of Gavray Drive)	NEW (BI230)	NEW (BI48)	NEW (BI19)	NEW (CH15)	NEW (ST2)	NEW (AM013 Ambrosden Poultry Farm)
1. Homes	++	++	++	++	++	++	++	++	++	+	++	+	+	++	++	++
2. Flooding	0	?	0	0	-	0	0	0	-	-	-	-	0	-	0	0
3. Health and well-being	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+
4. Poverty and social exclusion	+	+	+	?	+	+	+	+	?	+	+	+	+	+	+	+
5. Crime	?	?	?	+	?	?	?	?	?	?	?	?	?	?	?	?
6. Vibrant communities	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?
7. Accessibility	++	++	+	+	++	+	--	?	-	++	+	++	++	-	--	+
8. Efficient land use	--	+	--	++	--	--	--	--	--	-	--	--	++	-	-	--
9. Air quality	+	?	+	+	?	?	?	+	-	++	?	++	++	-	?	?
10. Biodiversity	-	-	+	-	--	+	+	-	--	--	+	+	+	+	--	+
11. Landscape and heritage	+	+	+	?	-	--	?	-	--	+	+	+	+	-	--	-
12. Road traffic	+	?	+	+	?	?	?	+	-	++	?	++	++	-	?	?
13. Resource use	+	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?
14. Waste	+	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?
15. Water	+	-	?	0	?	?	?	?	?	?	-	0	?	?	?	?

SA objective	Bicester 1 (BI200 – extension and intensification)	Bicester 2 (BI201 – extension into BI211 or BI222)	Bicester 3 (BI44)	Bicester 8 (BI5)	Bicester 12 (BI2 – extension & intensification)	BIC 5 (BI212)	BIC 7 (CV001 Dymocks Farm)	BIC 10 (Land east of Chesterton)	BIC 11 (Bignell Park)	BI31 (Land North of Gavray Drive)	NEW (BI230)	NEW (BI48)	NEW (BI19)	NEW (CH15)	NEW (ST2)	NEW (AM013 Ambrosden Poultry Farm)
quality and quantity																
16. Energy efficiency	++	?	?	?	?	?	?	?	?	?	?	?	?	?	?	?
17. Employment levels	++	++	+	++	++	+	++	++	++	+	+	+	+	+	+	++
18. Economic growth	++	++	+	++	++	+	++	++	++	+	+	+	+	+	+	++
19. Tourism	+	+	0	+	0	0	0	0	0	0	0	0	0	0	0	0

Reasonable alternatives for strategic employment development at Bicester

- 1.122 Three reasonable alternative strategic employment development locations were considered at Bicester, as shown in **Figure 2. Table 5** summarises the predicted effects for each SA objective. All three sites represent allocations in the Submission Local Plan on the edges of Bicester. Two of the sites are potential extensions to current allocations in the Submission Local Plan (Bicester 10: Bicester Gateway Business Park in the south and Bicester 11: North East Bicester Business Park in the north east).

Significant effects

- 1.123 Two of the strategic employment development locations (West extension of Bicester 10: Bicester Gateway, and BI210 including Extension to Bicester 11) would have significant positive effects on SA objectives 17 (**employment levels**) and 18 (**economic growth**) because they are large sites (taking into account the existing allocated boundary plus the potential extension) and would generate long term employment and training opportunities in the area, in addition to construction of the sites, which would create a significant number of jobs in the short to medium term. No other significant positive effects were identified, but all three sites would be likely to have minor positive effects on SA objectives 9 (**air quality**) and 12 (**road traffic**) as their development is close to existing local centres or in the case of the Bicester 10 extension is close to the new development at South West Bicester Phase 1 and accessible by means of National Cycle Route 51. All sites have minor positive effects in relation to SA objective 7 (**accessibility to facilities and services**), due to the sites being located close to existing services and facilities, or development of the sites for employment uses being able to improve accessibility to employment for existing residents, and some of the employment uses potentially including community services and facilities. Bicester 4 also has minor positive effects on SA objectives 10 (**biodiversity**) and 11 (**landscape and heritage**), due to the site's lack of habitat diversity and few varied landscape features having been 'penned in' by the road network, existing retail to the north and south and railway line to the east. Consequently, the development of Bicester 4 would reduce pressure on other more, valuable greenfield sites. The Bicester 11 extension has potential for good connectivity and use of sustainable transport modes given the site's location and range of uses nearby as well as existing public rights of way and the nearby National Cycle Route. Bicester 4 also has minor positive effects of SA objective 4 (**poverty and social exclusion**) due to its potential to contribute to improving the area within which it is located and maintaining existing low levels of deprivation.
- 1.124 Only the Bicester 11 proposed extension site (BI210) would have **potential significant negative effects**, both on SA objective 8 (**efficient use of land**) as it is a large greenfield site and SA objective 11 (**landscape and heritage**), as the wider extended site was identified in the LSCA as having low capacity for employment development.⁵ However, the area within site BI210 covered by the current Bicester 11 allocation in the Submissions Local Plan was assessed in the 2013 Bicester Landscape Sensitivity and Capacity Assessment⁶ as having a high capacity for employment and residential development.

⁵ WYG (July 2014) *Bicester Landscape Sensitivity and Capacity Assessment Addendum*

⁶ WYG (September 2013) *Bicester Landscape Sensitivity and Capacity Assessment*

Table 5: Summary of SA Scores for reasonable alternative strategic employment development locations at Bicester

SA objective	Bicester 4 (BI46)	NEW (West extension of Bicester 10: Bicester Gateway)	BI210 including Extension to Bicester 11
1. Homes	0	0	0
2. Flooding	-	-	-
3. Health and well-being	?	?	?
4. Poverty and social exclusion	+	?	?
5. Crime	?	?	?
6. Vibrant communities	?	?	?
7. Accessibility	+	+	+
8. Efficient land use	-	-	--
9. Air quality	+	+	+
10. Biodiversity	+	-	-
11. Landscape and heritage	+	?	--
12. Road traffic	+	+	+
13. Resource use	?	?	?
14. Waste	?	?	?
15. Water quality and quantity	-	-	-
16. Energy efficiency	?	?	?
17. Employment levels	+	++	++
18. Economic growth	+	++	++
19. Tourism	?	0	0

Strategic development locations at Former RAF Upper Heyford

- 1.125 Two reasonable alternative strategic housing development locations were considered at the Former RAF Upper Heyford site, as shown in **Figure 3**. **Table 6** summarises the predicted effects for each SA objective.

Significant effects

- 1.126 A number of **potential significant positive effects** were identified for both the intensification of housing provision on the existing allocated site and the provision of homes on the extension site

into land abutting the south and eastern boundary of Former RAF Upper Heyford. Both options would make a significant contribution to the new District housing requirement and therefore have a significant positive effect on SA objective 1 (**provision of homes**).

- 1.127 Both options are likely to have a **significant positive effect** on SA objective 7 (**accessibility to facilities and services**), because although the Former RAF Upper Heyford site is relatively isolated from existing services and facilities, both options would be large enough and need to be a self-contained redevelopment, therefore they would both be likely to achieve good provision of new services and facilities within the site. Both of the options would also be likely to have significant positive effects on SA objectives 17 (**employment levels**) and 18 (**economic growth**) because they are large enough to accommodate commercial and employment land, new community facilities and local services, all of which will generate long term employment opportunities in the area. In addition, the construction of the site will create a significant number of jobs in the short to medium term.
- 1.128 The option of intensification of the housing provision within the current allocation for Former RAF Upper Heyford is likely to have a **significant positive effect** on SA objective 8 (**efficient use of land**) as much of the site is previously developed land; therefore, any development of the site would meet the objectives of re-using previously development land and would have the potential for re-use of buildings. Development of the site would also provide the opportunity to remediate any contaminated land. By contrast, the option for the extension of the allocation into the land abutting the south and eastern boundary of Former RAF Upper Heyford would have a **significant negative effect** on the same objective (**efficient use of land**) because it is a large area of greenfield land within Grade 3 best and most versatile agricultural land.
- 1.129 The option of intensification of the housing provision within the current allocation for Former RAF Upper Heyford could have a **significant negative effect** on SA objective 10 (**biodiversity**) as Ardley Cutting & Quarry SSSI is in close proximity to the eastern edge of the site. In addition, the northeastern quarter of the site contains the District Wildlife Site Kennel Copse and the Local Wildlife Site Upper Heyford Airfield, **and the site's ecological sensitivity to redevelopment is considered to be Medium to Medium/High (3-4) in these locations.** However, there are parts of the site containing less significant habitats, such as standard buildings, amenity grounds and gardens, or areas of rough grassland, are typically considered of Low/Medium (2) ecological sensitivity.⁷ This same option could also have a significant negative effect on SA objective 11 (**landscape and heritage**) without appropriate mitigation, due to the combined landscape sensitivity of the site being assessed as High and the combined visual sensitivity for the area being Medium⁸, as well as entire site being designated as a Conservation Area and containing five Scheduled Monuments. In addition, there are three areas recognised in the National Monuments Record.⁹

⁷ WYG (July 2014) *Upper Heyford Landscape sensitivity and Capacity Assessment*

⁸ WYG (July 2014) *Upper Heyford Landscape sensitivity and Capacity Assessment*

⁹ English Heritage website, available from: <http://list.english-heritage.org.uk/results.aspx>

Table 6: Summary of SA Scores for reasonable alternative strategic residential/mixed use development locations at Former RAF Upper Heyford

SA Objectives	Reasonable Alternatives	
	UH1 & UH004 - Intensification	Extension into Land abutting the south and eastern boundary of Former RAF Upper Heyford (including UH002, UH003, UH005, UH006 and UH007)
1. Homes	++	++
2. Flooding	0	0
3. Health and well-being	+	+
4. Poverty and social exclusion	+	+
5. Crime	?	?
6. Vibrant communities	?	?
7. Accessibility	++	++
8. Efficient land use	++	--
9. Air quality	+	+
10. Biodiversity	--	-
11. Landscape and heritage	--	-
12. Road traffic	+	+
13. Resource use	?	?
14. Waste	?	?
15. Water quality and quantity	?	?
16. Energy efficiency	+	+
17. Employment levels	++	++
18. Economic growth	++	++
19. Tourism	?	?

Reasons for selecting the preferred alternatives

- 1.130 Alongside the SA of the reasonable alternative strategic development locations around Banbury, Bicester and Former RAF Upper Heyford, Cherwell District Council undertook its own planning assessment of the sites already allocated in the plan, discounted in earlier stages and/or put forward by developers. This involved updating the Strategic Housing Land Availability Assessment (SHLAA), taking into account the findings of the SA work and update work on the Habitats Regulations Assessment, County Council's transport assessments, Landscape Sensitivity and Capacity Assessment and Strategic Flood Risk Assessment.

- 1.131 Drawing on this evidence base, CDC has identified in the schedule of Main Modifications its preferred strategic development locations to allocate (and the amount of housing or employment land to be delivered), in addition to those already included in the Submission Local Plan, in order to meet the additional housing requirement set out in the Oxfordshire SHMA.
- 1.132 A summary of the reasons for selecting the preferred strategic development locations, and discounting other reasonable alternatives is provided below:
- Generally, for the existing strategic allocations in the Submission Local Plan, the reasons set out in Section 7 of the 2013 SA Report still stand.
 - Reasons for selecting new sites for allocation included:
 - Some sites were selected because on balance, compared to other reasonable alternatives, they were considered preferable (e.g. Land at Southam Road) to opening up an area of countryside elsewhere around Banbury (e.g. south of Banbury).
 - Potential adverse impacts e.g. on Conservation Areas could be avoided.
 - For employment: Well located strategic location adjacent to motorway junction.
 - Reasons for discounting sites included:
 - Considered in the LSCA to have low capacity for residential development, or that development at that location would not be in keeping with the existing landscape character of the area.
 - Avoiding encroachment of the urban edge towards nearby villages and coalescence.
 - Avoiding encroachment into the countryside.
 - Sites actively being promoted for another use (e.g. employment) therefore, not suitable for housing allocation.
 - Site being in an inaccessible location, or distant from the town centre and separated by the perimeter road.
 - Avoiding loss of highly accessible formal sports provision forming part of a green lung extending into the urban area.
 - Avoiding unacceptable harm to nature conservation sites, e.g. one site is a designated Local Wildlife Site and part of the site is a SSSI.

Appraisal of proposed Main Modifications to the Submission Local Plan

- 1.133 The SA of the Proposed Main Modifications to the Submission Local Plan is described below. The Proposed Main Modifications have been prepared by the Council taking into account new evidence gathered since the Submission Local plan was submitted to the Secretary of State, and the findings of the SA work described in this SA Addendum.

Reasons for selecting the alternatives

- 1.134 Proposed Main Modifications to the Submission Local Plan have been prepared by Cherwell District Council, including changes identified during and soon after the Examination Hearing Day 1 in June 2014 and further changes which have resulted from the work done to demonstrate that the additional housing requirement for the District set out in the Oxfordshire Strategic Housing Market Assessment can be met. The Proposed Main Modifications are shown in a schedule prepared by the Council. **The Council's reasons for including each proposed Main Modification to the Submission Local Plan is provided in the schedule.**

Approach to the appraisal of the proposed Main Modifications

- 1.135 The SA implications have been considered based on whether each Main Modification changes the SA findings identified in the 2013 SA Report for the Submission Local Plan. Where a Main

Modification relates to a significant change to the Local Plan that has not previously been appraised in the 2013 SA Report (for example a new or revised policy or strategic allocation), a new or revised SA matrix for the Main Modification was prepared as part of this current SA Addendum. Note that the SA Addendum has considered the sustainability effects of implementing the full policy, including the changes proposed by the Main Modifications, rather than just appraising the wording of the Main Modification on its own.

Summary of appraisal findings

- 1.136 Most of the changes in the Proposed Main Modifications do not represent a significant change to the Local Plan as they are generally minor in nature and are intended either to correct factual errors or to provide improved clarification. A few of the Proposed Main Modifications may have additional positive effects, but the overall SA score from the previous SA reports has not changed.
- 1.137 A number of new policies have been introduced through the Proposed Main Modifications:
- Bicester 13 – Gavray Drive.
 - Banbury 15 - Employment Land North East of Junction 11.
 - Banbury 16 – South of Salt Way – West.
 - Banbury 17 – South of Salt Way – East.
 - Banbury 18 – Land at Drayton Lodge Farm.
 - Banbury 19 – Land at Higham Way.
- 1.138 The following policies have been amended to change either the site area, number of homes to be provided, area of employment land and/or the policy requirements:
- SLE 1 – Employment Development.
 - SLE 4 – Improved Transport and Connections.
 - Bicester 1 – North-West Bicester Eco-Town.
 - Bicester 2 – Graven Hill.
 - Bicester 10 – Bicester Gateway.
 - Bicester 11 – Employment Land at North East Bicester.
 - Bicester 12 – South East Bicester.
 - Banbury 4 – Bankside Phase 2.
 - Banbury 6 – North of Hanwell Fields.
 - Policy Villages 5 – Former RAF Upper Heyford.
- 1.139 The strategic allocations in the new policies and revised policies were appraised in the SA Addendum.

Findings of the new and revised policy appraisals

- 1.140 The Submission Local Plan, together with the proposed Main Modifications, includes mitigation and enhancement measures either within the new or revised policies or elsewhere in the Local Plan, which should avoid in most instances significant adverse effects from occurring from the development proposed in the Submission Local Plan and proposed Main Modifications.
- 1.141 Overall, the SA found that a wide range of significant positive effects are likely to result from Submission Local Plan, together with the proposed Main Modifications.

Significant positive effects

- 1.142 A number of the policies recorded significant positive effects against SA objective 1 (Housing) including Bicester 1 – North West Bicester Eco-Town, Bicester 2 – Graven Hill, Banbury 4 – Bankside Phase 2, and Rural Villages 5 – Former RAF Upper Heyford.
- 1.143 Similarly, a large number of policies recorded significant positive effects against SA objectives 17 and/or 18 (Employment and Economic growth), including SLE1 - Employment Development, SLE2

- Securing Dynamic Town Centres, SLE3 - Supporting Tourism Growth, and Bicester 1 - North West Bicester Eco-Town, Bicester 2 - Graven Hill, Bicester 10 - Bicester Gateway, Bicester 11 - Employment Land at North East Bicester, Bicester 12 - South East Bicester, Banbury 6 - North of Hanwell Fields, Banbury 8 - Bolton Road Development Area, and Rural Villages 5 - Former RAF Upper Heyford.

- 1.144 Several sites recorded significant positive effects against SA objective 7 (Accessibility to services and facilities), including Bicester 1 - North West Bicester Eco-Town, Bicester 2 - Graven Hill, Bicester 12 - South East Bicester, Bicester 13 - Gavray Drive, Banbury 4 - Bankside Phase 2, Banbury 8 - Bolton Road Development Area, Banbury 16 - South of Salt Way West, Banbury 17 - South of Salt Way East, Banbury 18 - Land at Drayton Lodge Farm, Banbury 19 - Land at Higham Way, and Rural Villages 5 - Former RAF Upper Heyford.
- 1.145 Fewer sites recorded significant positive effects against SA objective 3 (Improve health and well-being), SA objective 6 (Sustain community vibrancy), SA objective 8 (re-use of previously developed land), SA objective 9 (Reduce air pollution), SA objective 12 (Reduce congestion), SA objective 13 (Reduce resource consumption), SA objective 14 (Reduce waste).
- 1.146 Bicester 1 - North West Bicester Eco-Town performed particularly strongly recording significant positive effects against nearly half of the SA objectives. Bicester 2 - Graven Hill, and Rural Villages 5 - Former RAF Upper Heyford, also performed strongly with a number of significant positive effects.
- 1.147 Bicester 13 - Gavray Drive, Banbury 16 - South of Salt Way West, Banbury 17 - South of Salt Way East, Banbury 18 - Land at Drayton Lodge Farm, recorded significant positive effects against only one SA Objective, being SA objective 7 (Accessibility to services and facilities), although in common with many of the other sites, they recorded a number of minor positive effects against some of the other SA objectives.

Significant negative effects

- 1.148 The only SA objective for which significant adverse effects were recorded was for SA objective 8 (Re-use of previously developed land). This is because for a number of sites, development that will take place on greenfield, often agricultural, land for which no mitigation is possible. These relate primarily to the following allocations:
- Bicester 1 - North-West Bicester Eco-Town.
 - Bicester 10 - Bicester Gateway.
 - Bicester 11 - Employment Land at North East Bicester.
 - Bicester 12 - South East Bicester.
 - Banbury 4 - Bankside Phase 2.
 - Banbury 15 - Employment Land North East of Junction 11.
 - Banbury 16 - South of Salt Way - West.
 - Banbury 17 - South of Salt Way - East.
 - Banbury 18 - Land at Drayton Lodge Farm.
- 1.149 It should be noted that, with respect to the new site allocation Banbury 15 - Employment Land North East of Junction 11, this is the first significant scale of development that has been allocated **to the east of the M40 at Banbury. As a result, it could be considered that now this 'boundary' will be breached, it opens up the greater likelihood for additional development east of the M40 in the future.**

Mitigation

- 1.150 A number of mitigation and enhancement measures were recommended as a result of the SA Addendum, as relevant to the site concerned. These include:
- Undertaking a full drainage impact assessment and Flood Risk Assessment where appropriate as part of any future development, as well as incorporating in the design of development

sustainable drainage systems, to ensure no increase in flood risk, particularly surface water run-off and improvements in run-off water quality.

- Where possible and appropriate, ensuring the re-use of existing buildings and locally sourced materials in development proposals.
- Planting of vegetation along strategic route ways to screen potential noise and traffic impacts.
- Protecting and enhancing public rights of way and hedgerows.
- Including **good provision of services and facilities to reflect the community's needs and** support its health, social and cultural well-being.
- Undertaking of ecological surveys as part of proposals for development, in order that the design of the development takes into account the potential for ecological impacts.
- The promotion of biodiversity conservation/enhancement and habitat creation, in particular linkages with existing BAP priority habitats.
- Carrying out of full landscape and visual impact assessment, as well as a cultural heritage assessment, as part of future development.

1.151 The recommended mitigation and enhancement measures have been reflected in the proposed Main Modifications, as appropriate.

1.152 The assessment of residual effects assumes that all development is delivered in accordance with the policies in the Local Plan as a whole, and that the mitigation and enhancement measures are effective.

Findings of the Habitats Regulations Assessment

1.153 The HRA Screening Report noted that there is one international site within the District of Cherwell: Oxford Meadows Special Area of Conservation (SAC). The HRA Screening Report concluded that none of the policies present in the Cherwell District Council Submission Cherwell Local Plan incorporating Proposed Modifications will lead to likely significant effects on Oxford Meadows SAC, alone or in combination with other plans and projects.

Potential cumulative effects of the Cherwell Local Plan as proposed to be modified

1.154 The SEA Directive requires an assessment of cumulative effects. Cumulative effects arise, where several developments each have insignificant effects but together have a significant effect; or where the effects of different elements of the plan will have a combined significant effect. The term can also be used to describe synergistic effects, which interact to produce a total effect greater than the sum of the individual effects.

1.155 **Significant positive cumulative effects** at Bicester are likely to arise with respect to employment and the economy of the town **and the** contribution of development towards reducing poverty and social exclusion, and creating vibrant communities. Similar significant positive cumulative effects are likely at Banbury.

1.156 The proposed development at Bicester is most likely to give rise to **significant adverse cumulative effects** in relation to the loss of greenfield and agricultural land. There is also the potential for significant adverse cumulative effects with respect to air quality, biodiversity and the landscape, although these are not certain. At Banbury, potential significant adverse cumulative effects relate to the loss of agricultural land and potentially landscape.

1.157 For the Plan area as a whole, it is likely that the additional growth in the proposed Main Modifications is likely to generate traffic across the District and beyond, because it also allows for additional development at Former RAF Upper Heyford and the Rural Areas. These locations are less well served by local services and facilities (although the additional development should help to create extra demand for them assisting with their viability), and therefore it is likely that many

residents will continue to work and use services and facilities elsewhere. This, along with the additional development, is likely to lead to a sense of increased urbanisation in a predominantly rural District. It is difficult to assess whether this is likely to be significant in SA terms, or whether this will affect environmental receptors such as biodiversity (which is likely to be more influenced by land management practices such as farming), but for some residents the difference is likely to be noticeable.

- 1.158 The additional growth will also place greater pressure on water resources and waste water treatment works, although this should be addressed through the resource planning and investment programmes of the water companies.
- 1.159 Conversely, the additional housing and employment, not only at Bicester and Banbury, but elsewhere in the District is likely to lead to cumulative positive effects with respect to the local economy, and social objectives such as meeting housing need in smaller communities.
- 1.160 The assessment of cumulative effects of the Submission Local Plan incorporating proposed Main Modifications, with other plans, programmes of projects did not identify any significant cumulative effects.

Conclusions

- 1.161 The SA Addendum Report brings together the results of an intense period of work over two months that has sought to identify the effects of a range of alternatives to the Cherwell Submission Local Plan in order to ensure that the final adopted Local Plan accommodates the full objectively assessed needs of the Cherwell District.
- 1.162 The SA Addendum work builds on the earlier SA work on the Submission Local Plan. The Local Plan Strategy remains unchanged. It is not intended to replace the earlier SA work, but to supplement it, by providing further assessment as necessary in order to help the District Council make decisions and choose the most appropriate strategy for accommodating the additional development identified as being needed over the period covered by the Local Plan. A Scoping Report for the SA Addendum work was prepared in June 2014 and the comments of consultees reflected in the work as appropriate.
- 1.163 The SA Addendum work has involved close working between LUC, as the appointed SA consultants, and Council officers, with the findings of the SA work feeding into the decision-making process throughout. The SA Addendum work takes into account up-to-date evidence on the objectively assessed housing and jobs provided by independent consultants, plus other technical studies as relevant.

The influence of the SA Addendum on the Cherwell Local Plan

- 1.164 The aim of the SA Addendum work has been to be objective and to be as consistent as possible with the method of approach as was used for the original SA. It used the same SA objectives, appraisal matrices, and sought to use similar assumptions when coming to judgements on the likely effects of the reasonable alternatives and the proposed Main Modifications.
- 1.165 Although the SA has considered the sustainability effects of all the proposed Main Modifications, the primary focus of the work has been on the alternative options for accommodating the additional development identified as being needed through the work on objectively assessed housing needs and the economic analysis. This work has identified the need to accommodate a significant increase in housing and also for additional employment land.
- 1.166 The SA Addendum has assessed the quantum of development, the overall spatial strategy for accommodating the additional development, and the locations where the additional development should be more appropriately delivered. Reasonable alternatives were considered as part of this process.
- 1.167 The SA Addendum found that the overall spatial strategy in the Submission Local Plan should continue to be pursued for the additional development identified as being needed, taking into account that there is no necessity for an immediate strategic review of the extent/boundaries of the Oxford Green Belt in the District for new housing.

- 1.168 The spatial strategy set out in the Submission Local Plan involves focusing the majority of development at the two main towns in the District – Bicester and Banbury – whilst allowing for some development to meet the needs of rural communities. In the rural areas, a key component is the provision of development at Former RAF Upper Heyford, where a new community is taking shape. The proposed Main Modifications continue to pursue this approach, and the SA Addendum work has found that this represents a balanced and proportionate way of accommodating the additional development.
- 1.169 There are environmental constraints that affect many parts of the District, such as flood risk, landscape, biodiversity, heritage, and agricultural land but these are not of such significance to preclude further development from happening in the locations proposed. Banbury has particular topographical constraints that make it more of a challenge to accommodate development around parts of the town than at Bicester, but it has the advantage of being a sub-regional centre in its own right and therefore needs to accommodate some of the additional growth in order to maintain and reinforce its role and function. It is of note that as part of the proposed Main Modifications a new employment site has been identified east of Junction 11 of the M40, as the motorway has up until now acted as the eastern-most boundary to expansion of the town.
- 1.170 Bicester is more heavily influenced by Oxford, and growth at the town should help to strengthen its ability to reinforce its own identity and critical mass, in terms of housing, jobs, retail and community services and facilities, so that residents have less desire to travel elsewhere to meet their needs. The town itself offers opportunities for employment development within easy access of residents. The rural areas also need to accommodate some additional development in order to provide for affordable housing and to support their local services and facilities, but on a scale that is commensurate with their role and character, and not so great that it leads to unsustainable transport movements, often on rural roads.
- 1.171 Former RAF Upper Heyford is constrained by its heritage value, its nature conservation interest, and the proximity of nearby villages, but it offers the opportunity for environmental improvements to develop into a more significant settlement in its own right that provides for a greater range of jobs, services and facilities on previously developed land.
- 1.172 The SA Addendum work assessed a number of strategic development locations for both housing and employment at Bicester, Banbury and Former RAF Upper Heyford. These included intensification of existing allocations in the Submission Local Plan, extensions to existing allocations, and new allocations. In many instances, environmental constraints were identified that could give rise to significant adverse effects if developed without adequate mitigation. The appraisal process sought to identify the potential positive and negative effects, and what mitigation would be needed, in order to inform the final selection of additional development locations in the proposed Main Modifications and the criteria that should apply to ensure that they are developed sustainably.
- 1.173 The SA Addendum records the reasons of the Council why some reasonable alternatives were included in the proposed Main Modifications, and others rejected.
- 1.174 The SA of the proposed Main Modifications found that these are likely to give rise to a range of significant positive effects, particularly with regard to social and economic SA objectives. Because the policies in the Submission Local Plan, together with the proposed Main Modifications, have a range of safeguards that seek to avoid significant adverse effects on the environment, few significant residual adverse effects were identified. The main significant residual adverse effect was the loss of greenfield, often agricultural, land that cannot be avoided if the full needs of the District are to be accommodated. Minor adverse effects remain in some instances, but should be able to be mitigated through proper implementation of the numerous policy requirements included in the Submission Local Plan and the proposed Main Modifications.

Cumulative effects

- 1.175 The main cumulative effects that have been identified in relation to the Submission Local Plan incorporating the proposed Main Modifications are similar to those for individual development locations – significant positive effects with respect to social and economic SA objectives, and significant adverse effects with respect to the loss of greenfield, often agricultural, land to development. No significant cumulative effects were identified with respect to other plans and programmes of neighbouring authorities.

Difficulties encountered

- 1.176 **Schedule 2 of the SEA Regulations requires the SEA Report to include “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”.** The main difficulty encountered while carrying out the SA work was in trying to be consistent with an approach to the SA that was developed by the consultants who carried out the original SA work on the Submission Local Plan. Although there were many similarities, the approach used for the original SA differed in parts from the approach normally adopted by LUC, even though the ultimate aim of the SA work is the same – to identify significant effects of implementing the plan and reasonable alternatives.
- 1.177 However, consistency in SA work is important in order to aid transparency, robustness and like-for-like comparison between reasonable alternatives, and therefore the approach adopted in the original SA work continued to be used with respect to the SA Addendum work. This meant revising the original SA matrices where proposed Main Modifications are putting forward changes to policies, and creating new SA matrices but using the same framework for new policies. The approach and level of detail of the SA, for example, with respect to the identification of cumulative effects was the same as was used in the original SA.
- 1.178 In addition, because of the tight timetable for carrying out the SA of reasonable alternatives for accommodating the additional development identified as being needed in the District, and also for the carrying out the SA of the resulting proposed Main Modifications, the SA work had to be carried out rapidly. It is a complex process to report upon, but the SA Addendum covers all the work undertaken and provides an audit trail of the decision-making process.
- 1.179 In our view, despite the challenges, the SA Addendum work has been carried out thoroughly and accurately, and with due regard to the SEA Regulations. We would like to thank Cherwell District Council officers for checking the SA work, particularly the factual content, to minimise the likelihood of errors being included in this report.

Monitoring

- 1.180 Once the Local Plan is adopted, the significant effects identified in the original SA work and the SA Addendum will need to be monitored. Appendix F of the original SA sets out a range of indicators for monitoring framework the implementation of the Local Plan.
- 1.181 We recommend that the monitoring framework is developed in more detail and recorded in the SA/SEA Adoption Statement when the Local Plan is adopted, with clear structure to show what monitoring needs to take place and why, who should be responsible for carrying out and reporting on the monitoring, and the arrangements for remedial action should the monitoring work identify unexpected significant effects.

LUC

October 2014

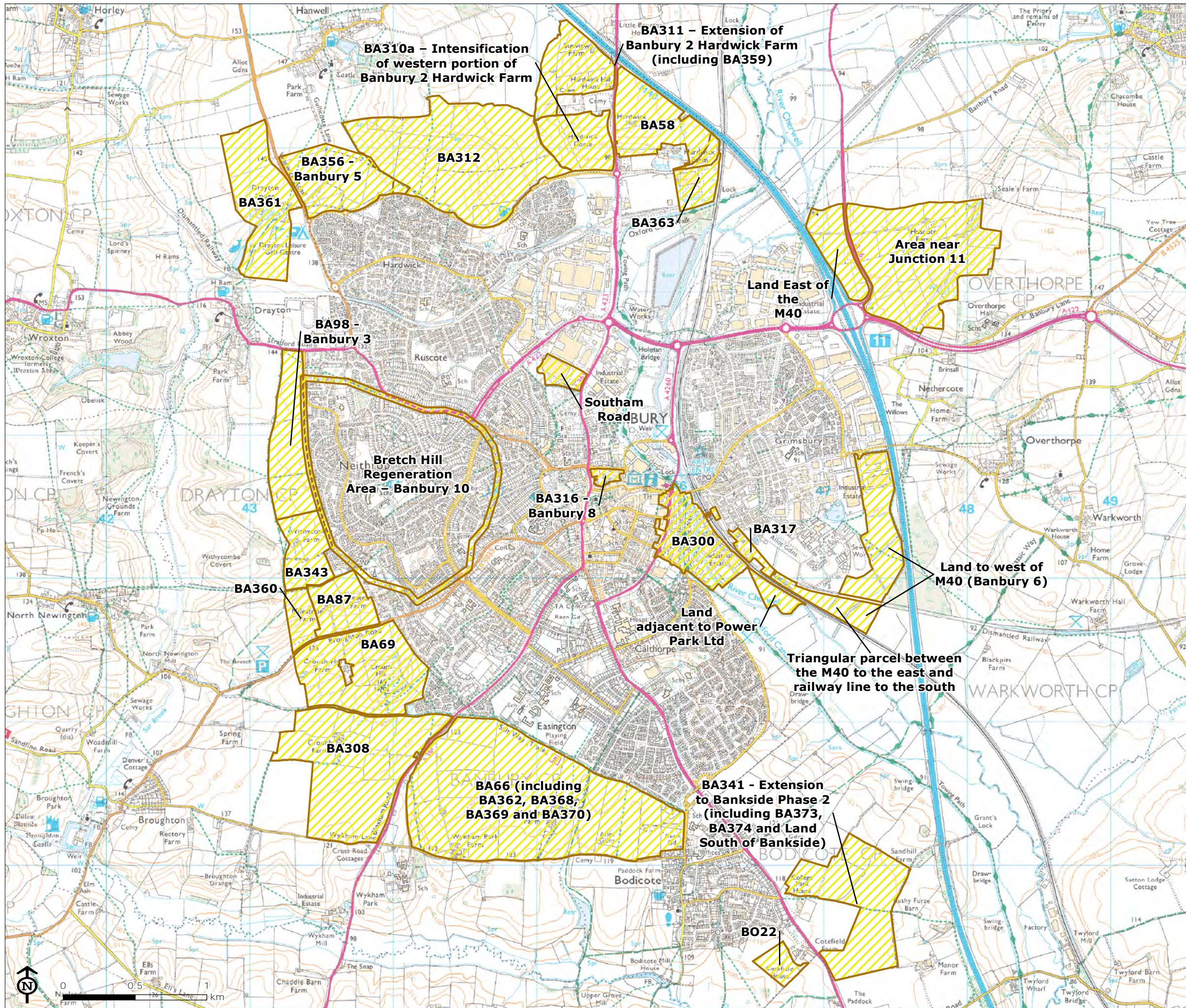


Figure 1

Reasonable alternatives and allocated sites in Submission Local Plan appraised as part of the 2014 SA Addendum – Banbury

 Site

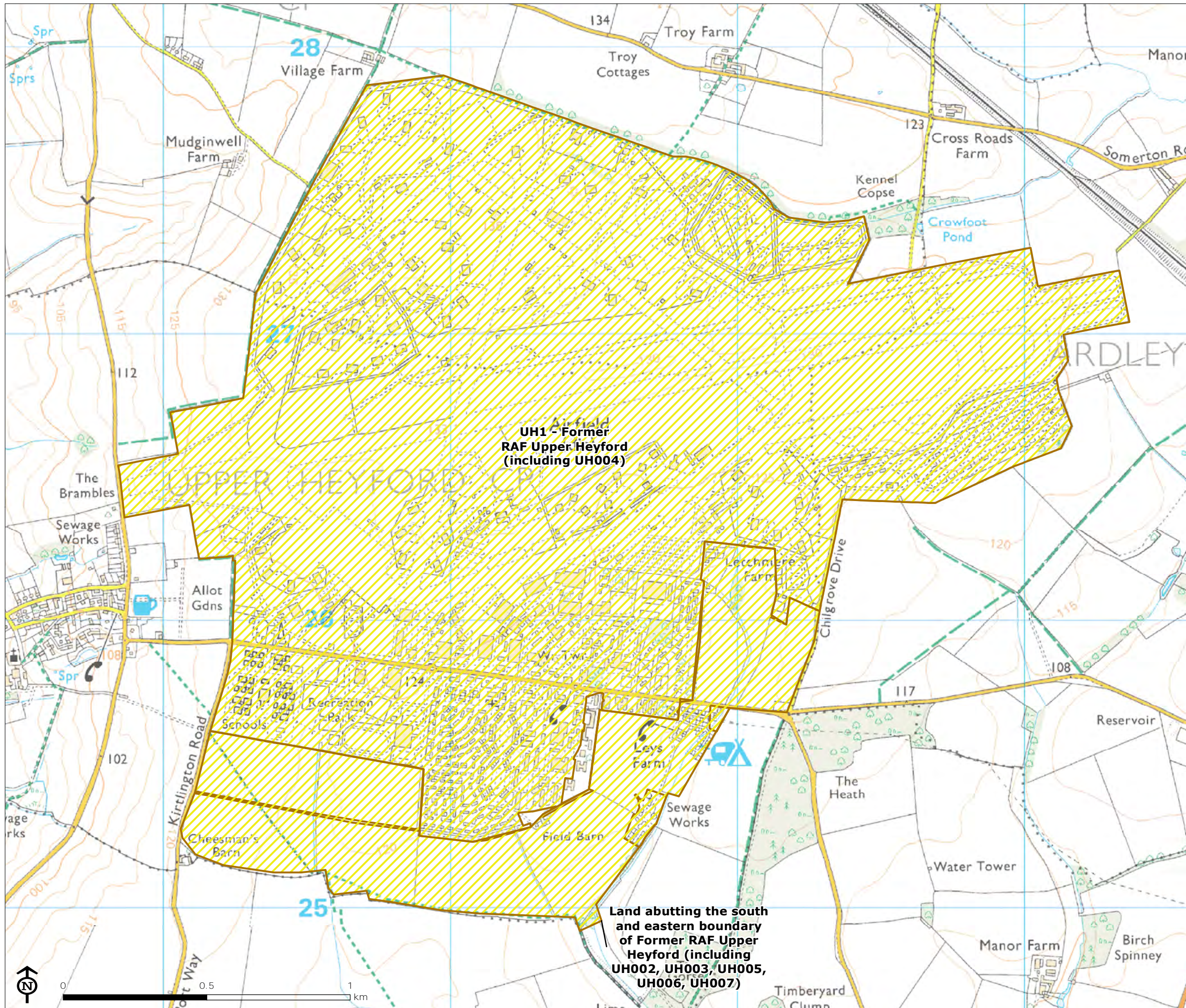
Map Scale @ A4: 1:28,000



Figure 3

Reasonable alternatives and allocated sites in Submission Local Plan appraised as part of the 2014 SA Addendum – Former RAF Upper Heyford

 Site



Map Scale @ A4: 1:19,000

