

Sustainability Appraisal (SA) of the Cherwell Local Plan Review

SA Report

Non-technical Summary

December 2024



Introduction

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Cherwell Local Plan Review that is being prepared by Cherwell District Council.

Once in place, the Local Plan will set a strategy for growth and change for the period to 2042, allocate sites to deliver the strategy and establish the policies against which planning applications will be determined.

SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. Local Plans must be subject to SA.

Central to the SA process is preparation of an SA Report for publication alongside the draft plan that presents an appraisal of “the plan and reasonable alternatives”.

At the current time, the SA report is published alongside the ‘proposed submission’ version of the Local Plan, under Regulation 19 of the Local Planning Regulations (following ‘interim’ reports published alongside early drafts of the plan in 2020 and 2023).

This is the Non-technical Summary (NTS) of the SA Report.

It is important to be clear that this is currently in draft and will be finalised in time for Regulation 19 publication.

Structure of the SA Report / this NTS

SA reporting essentially involves answering the following questions in turn:

1) What has plan-making / SA involved **up to this point**?

- including in relation to ‘reasonable alternatives’.

2) What are the SA findings **at this stage**?

- i.e. in relation to the draft plan.

3) What happens **next**?

Each of these questions is answered in turn below. Before doing so, there is a need to set the scene further by answering the question: *What’s the scope of the SA?*

What’s the scope of the SA?

The scope of the SA is reflected in a list of topics and objectives. Taken together, this list provides a methodological ‘framework’ for appraisal.

The following topics comprise the core of the SA framework:

- Air quality and environmental quality
- Biodiversity
- Climate change adaptation
- Climate change mitigation
- Communities
- Economy and employment
- Historic environment
- Homes
- Land, soils and resources
- Landscape
- Transport
- Water

Plan-making / SA up to this point

Two key steps in the required SA process are: A) appraise reasonable alternatives in time to inform development of the draft plan; and then B) publish information on reasonable alternatives as part of the draft plan consultation.

As such, Part 1 of the SA Report explains work undertaken in 2024 to develop and appraise a reasonable range of “growth scenarios”, essentially in the form of alternative key diagrams, i.e. alternative approaches to development where each is ‘reasonable’ in terms of providing for development needs and delivering on wider plan objectives.

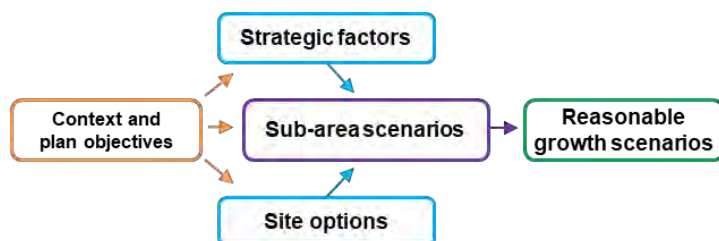
A focus on growth scenarios ensures a focus on the choice at the very heart of the plan. Furthermore, it ensures a focus on alternatives that are meaningfully different in terms of ‘significant effects’ (it being a requirement for SA to focus on significant effects).

In short, the process of exploring growth scenarios involved: **1)** defining growth scenarios; **2)** appraising growth scenarios; and then **3)** feeding-back to inform the draft plan.

Defining growth scenarios

Section 5 of the main report explains the process of defining reasonable alternative growth scenarios for appraisal and consultation. Figure A provides an overview.

Figure A: Process overview



Context and plan objectives

Plan-making has been underway since 2020, but a key milestone was reached in Autumn 2023 when the Council consulted on a Draft Local Plan Review (LPR). The consultation provides key context to defining reasonable growth scenarios, but there have also been some significant shifts to the context since that time. Firstly, the Oxford Local Plan submitted for examination in early 2024 now looks set to be withdrawn, with implications for the understanding of Oxford City's unmet housing need that had informed preparation of Cherwell's Draft LPR in 2023. Secondly, context comes from the Government's recent [consultation](#) on 'Proposed reforms to the National Planning Policy Framework (NPPF) and other changes to the planning system'. A key implication of the consultation / reform agenda is that there is an urgent need to adopt the LPR in order to avoid a situation whereby the adopted Local Plan is deemed out-of-date such that the presumption / tilted balance in favour of development applies when considering planning applications.

Simply achieving an up-to-date local plan is key, but there are also a range of other objectives in place to guide plan-making and, in turn, work to define growth scenarios. These cover Council priorities including net zero, nature recovery and affordable housing.

Strategic factors

Section 5.2 of the main report gives consideration to:

- **Quantum** (*how much?*) – focusing on housing, Local Housing Need (LHN) currently stands at 15,629 homes (2020-2042) according to the Government's standard method, although the Government has recently consulted on a new standard method that would see the figure increase to 22,631 homes (if unchanged following consultation).

Furthermore, the District is already committed to providing for 4,400 homes of Oxford City's unmet need, such that a starting point for defining growth scenarios is a need to identify supply sufficient to enable the housing requirement to be set at 20,029 homes (LHN plus unmet need). Lower growth scenarios can be ruled-out as unreasonable; however, there are reasons for remaining open to higher growth scenarios.

- **Broad spatial strategy** (*where and how?*) – the main report presents a discussion under three headings: 1) Cherwell's sub-areas; 2) sub-regional context; 3) overarching aims of the LPR. A key consideration is the balance of growth between settlements, and also the appropriate mix of development site typologies, e.g. large strategic, strategic and smaller sites. The main report presents the following conclusions:
 - There is a strong argument for *broadly* rolling forward the existing strategy, particularly the strategy of directing a high proportion of growth **Bicester** and **Banbury**, and to Bicester in particular.
 - There are strategic arguments in support of growth in the **Kidlington** area and at **Heyford Park**. However, there are a range of detailed factors to consider, e.g. Green Belt constraint at Kidlington and transport constraint at Heyford Park.
 - There are limited strategic arguments in support of a **new settlement**. However, new settlement options do warrant proportionate consideration.
 - There are limited strategic arguments for dispersing growth to the **rural area**, including noting recent levels of growth, but a number of Parish Councils are prepared to allocate sites through a neighbourhood plan.
 - In light of the recent Cherwell experiences, and also mindful of the Oxfordshire context (e.g. seeking to align with growth with transport and decarbonisation objectives) there is support for **strategic growth locations**. However, there is also a need for a good mix of site allocations, to include smaller sites.
 - There are myriad **other strategic factors** that must feed-in to work to define growth scenarios, e.g. accounting for strategic infrastructure and environmental issues and opportunities and delivering on net zero carbon commitments.
 - Providing for **employment land** needs is also a key consideration for the LPR. Calculating needs is complex, including because of a need to account for various types of employment land (industrial, distribution, R&D, offices), and there are a range of broad spatial strategy considerations that must feed-in.

Site options

Section 5.3 of the main report explains how the Housing and Economic Land Availability Assessment (HELAA) identifies a shortlist of site options that can then be drawn upon as the building blocks for growth scenarios. The HELAA identifies sites with a total theoretical capacity far in excess of what is required under any reasonable scenario. However, the HELAA looks at sites in isolation, such that there is the possibility of HELAA-rejected sites needing to be brought back into contention for allocation in light of strategic factors.

Sub-area scenarios

Section 5.4 is a key section within the main report. Five sub-areas are defined, and for each the aim is to: A) discuss strategic factors; B) consider site options (in isolation and in combination); and then C) conclude on sub-area scenarios, in the form of alternative combinations of site allocations, to progress to the final stage in the process.

From Table A it can be seen that across the sub-area scenarios some sites are progressed as 'constant' and others as a 'variable'. Each of the sub-areas is then discussed in turn.

N.B. to reiterate this work remains in draft at the current time.

Table A: Summary of sub-area scenarios (with number of homes in brackets)

Sub area		Scenarios (N.B. supply from LPR allocations only)
Banbury		One scenario: 770 homes
Bicester		Three scenarios: 0, 800 or 1,000 homes
Kidlington	Green Belt	Three scenarios: 0, 300 or 2,000 homes
	Non- GB	One scenario: 450 homes
Heyford Park		One scenario: 0 homes
Rural area		One scenario: 565 homes
Total supply over-and-above completions, commitments & windfall	Minimum	1,785 homes
	Maximum	4,785 homes

Banbury

As well as supply from completions (homes delivered since the start of the plan period) and commitments (essentially sites with planning permission), there is clear support for a further 170 homes at Calthorpe Street. This is potentially a reasonable level of growth for Banbury, given constraints to growth and relatively limited strategic case for growth, as discussed. However, East of Bloxham Road, Banbury (Phase 2) is considered to be a strongly performing site for additional allocation (600 homes). It was found to perform relatively well through the consultation in 2023, and adjustments have been made to the site boundary / proposed scheme since that time. Whilst extending a recently permitted scheme is never ideal (i.e. a preferable approach would have been to plan comprehensively across both sites, including with a view to negotiating planning gain), the committed site adjacent to the north is now under construction and, in turn, a benefit of allocating land for 'Phase 2' is that the site has very strong delivery credentials, in that there is low delivery risk and it can deliver relatively early. This is an important consideration given a need to be able to demonstrate a five year housing land supply against the committed housing requirement (whatever that may be) at the point of plan adoption and in the context of constraints to early delivery of sites at both Bicester (grid constraints) and Kidlington (Oxford sewage treatment works capacity constraints).

In this light, **sub-area scenario 1** involves allocation of both Calthorpe Street and East of Bloxham Road, Banbury (Phase 2) leading to a total supply figure of 6,477 homes for Banbury, and there is not considered to be a reasonable lower growth scenario (which is not to say that consultees cannot put forward arguments for lower growth; they are welcome to do so through the current consultation). With regards to higher growth, there is a limited strategic case to be made, and another consideration is that all three of the larger villages closely linked to Banbury – Adderbury, Bodicote and Bloxham – are all suited to a significant housing requirement (with allocations then made through a subsequent neighbourhood plan), as discussed further below. It is recognised that there is the option of allocating North of Dukes Meadow Drive, in order to deliver an additional ~200 homes over-and-above the permitted site for 78 homes, but an expanded scheme would deliver limited additional benefits (beyond homes) and would give rise to additional concerns in terms of landscape impacts and problematic piecemeal growth to the north of Banbury. Also, this site does not perform very strongly in transport terms in comparison to others in contention for allocation district-wide, and there is the context of problematic traffic congestion and air quality in Banbury. There are currently a planning application pending for part of the non-permitted part of this site, and so it is considered appropriate for this application to take its course, rather than exploring the option further here through appraisal of / consultation on reasonable growth scenarios.

Bicester

A large number of completions and commitments have delivered or will deliver in the plan period, plus 4,300 homes at NW Bicester will deliver beyond the plan period. This is potentially a reasonable level of growth, recognising that this level of growth in combination with completions and commitments elsewhere (13,653 homes), support for two allocations at Banbury (770 homes) and a windfall assumption (1,400 homes) leads to a total supply district-wide of 23,572 homes, which is a figure comfortably in the context of the 20,029 homes figure discussed above as a reasonable lower growth housing requirement.

As such, **sub-area scenario 1** involves no new LPR housing allocations, but there is also a clear need to remain open to higher growth, given arguments for higher growth district-wide and the strategic case for growth at Bicester. In this regard, a first port of call is South East of Wretchwick Green, which was judged to be a strongly performing site at the Draft Plan / Interim SA Report stage (2023) to the extent that its allocation was held constant across the RA growth scenarios (albeit in the context of a different understanding of the housing quanta starting-point for the LPR). The appraisal did flag some significant concerns, including from a biodiversity, landscape and containment/sprawl perspective, including noting that the site would extend a permitted strategic urban extension, but the site benefits from a location on a strategic transport corridor, namely the A41, and could deliver some targeted benefits. Another key issue with the site is that its timetable for delivery is unknown, because the timetable for delivering the adjacent permitted site is unknown, including on account of grid capacity issues; and it could even potentially be that the allocation option delivers beyond the end of the plan period. Nonetheless, it remains a reasonable option to test, given a case for taking a long-term, vision-led approach to growth at Bicester and across the wider south of the District. Allocation of this site leads to **sub-area scenario 2**.

At the Draft Plan / Interim SA Report stage (2023) the other site allocation to feature within the RA growth scenarios was Wendlebury, with the assumption of a 1,000 home scheme despite the site being promoted for 2,800 homes. The site was shown to have a range of issues/impacts through the appraisal, no support for the site was highlighted through the consultation and the consultation response received from the site promoters did not directly respond to any of the issues raised (in fact it did not reference the SA). However, on balance, it remains an appropriate and reasonable option to test at this stage, including with a view to ensuring a strategic approach to growth along the A41 (noting the option of an 'employment gateway' to the north) and because growth in this direction would be entirely contained by the flood risk zone. Also, the site could potentially assist with delivering a new southern perimeter road, although it is not clear that this would be the case to any significant extent.

The issue is that the site is being promoted for 2,800+ homes including with a significant part of the scheme within the flood risk zone (the 2023 consultation response refers briefly to a mitigation, but there is no clarity). There is no certainty regarding what if any scheme could be delivered whilst avoiding growth in the flood risk zone; however, on balance it is considered again appropriate to assume a 1,000 home scheme, whilst acknowledging such a scheme may not be seen as viable by the landowner(s) / site promoter.

Finally, with regards to Wendlebury, there is the question of whether it should be assumed to deliver: A) in addition to South East of Wretchwick Green (as the sequentially less suitable site) such that its allocation would involve a high growth strategy for Bicester; B) in place of South East Wretchwick Green or C) both in addition to and in place of. There is a case for high growth at Bicester, but delivery could be a limiting factor. Taking a pragmatic approach option (B) is favoured, leading to **sub-area scenario 3**.

The next port of call is then the option of retaining support for a mix of housing growth and major new employment land along the A41 in the Chesterton area, to the west of Bicester, and it is noted that the County Council highlights that this approach has some merit on transport grounds. However, the latest view is that there should be a focus on delivering a new employment gateway to Bicester in this area, there are drawbacks to close integration of housing and employment land (particularly distribution uses) and the new proposed approach assists with retaining Chesterton's function as a historic village.

Finally, whilst there are several other sites subject to limited constraint, these tend not to align well with strategic objectives for Bicester particularly around transport and/or are in proximity to NW Bicester, which must be supported to now deliver in a timely manner.

In conclusion, there are three sub-area scenarios taken forward. This is in respect of housing growth, but employment growth is another key consideration. The emerging proposed approach involves high growth, including a major focus along the A41 close to M40 J9 (also a new proposed site adjacent to Glaven Hill).

Kidlington

The main report gives consideration to: Edge of Woodstock; Edge of Oxford; Yarnton / Bebroke; Kidlington; Islip; New settlement options. Discussions are mostly unchanged from those presented in the Interim SA Report (2023; see [here](#)), and in conclusion:

- There is strong support for allocation of Land east of Woodstock, for 450 homes, albeit the site is not without its issues, perhaps most notably in terms of access to a primary school, but also in terms of linking to Woodstock. This is **sub-area scenario 1**.
- There are two higher growth scenarios, as per the conclusion reached in 2023, namely additional allocation of Land North of the Moors for 300 homes (**sub-area scenario 2**)

or additional allocation of Shipton Quarry for 2,000 homes (**sub-area scenario 3**). Islip is a potential alternative to Shipton Quarry, but road connectivity is a key issue.

A scenario involving allocation of both sites is not taken forward noting Green Belt as a constraint to growth in this area, plus all three growth locations could lead to in-combination impacts, e.g. on Kidlington (traffic) or the river corridor.

- There is also a clear need to remain alive to strategic objectives around comprehensive planning for R&D employment land linked to Oxford. However, there is significant committed employment land, and more broadly the context of extensive committed growth in the Kidlington area following the Local Plan Partial Review (2020). Options can and will be revisited once committed growth progresses and further work is undertaken in respect of visioning, strategic masterplanning etc.

Heyford Park

Section 5.2 of the ISA Report (2023) explained the [background](#) to Heyford Park, and then Section 5.4 of the report concluded: *“It is relatively straightforward to arrive at [sub-area] scenarios for Heyford Park, relative to the three sub-areas discussed above. There are clear arguments for exploring additional growth, and any further additional growth must be comprehensive rather than piecemeal; however, there is also a need to consider the option of no further growth at Heyford Park, e.g. noting relatively poor transport connectivity.”*

The allocation option then appraised (in addition to the option of no allocation, i.e. support only for the committed level of growth / existing masterplan) involved 1,235 homes, and this option was then taken forward as a preferred option within the Draft Plan, as explained in Section 7 of the ISA report, which explained (as part of a quote from officers responding to the appraisal of growth scenarios): *“Heyford Park – it is recognised that this is a challenging location for growth from a transport perspective, but the strategy is specifically designed to deliver new transport infrastructure / service upgrades and precludes additional development coming forward before 2030 or without clear mechanisms in place to ensure the necessary infrastructure is forthcoming. The approach will also support improved containment / trip-internalisation in the longer-term. It is acknowledged that this part of the district is relatively constrained in terms of comprising better quality agricultural land; however, it might well be the case (following further investigations), that the land is only grade 3a quality, i.e. the lowest grade of land classed as ‘best and most versatile’. There is also a need for further work in respect of wastewater infrastructure, plus there is a clear need for further close working with Historic England regarding the historic environment / heritage constraint (in respect of the former airfield and more widely).”*

However, the situation has now moved on in two related respects.

Firstly, the County Council is now clear that a further 1,250 home allocation is not supported from a transport perspective, even after having accounted for the potential to deliver new infrastructure and support increased trip internalisation within Heyford Park as a whole. There is a very strong focus on ensuring that growth in Oxfordshire aligns with a vision-led approach to transport planning (including noting that there are new references to this approach in the Draft NPPF, 2024), which means focusing growth at larger settlements and/or at locations well connected by public and active transport. Whilst there is the potential to reopen a train station at Ardley, the potential to do so and suitably link Heyford Park residents to the station would be highly uncertain under a scenario involving a 1,250 home allocation. With regards to bus connectivity, whilst services could be improved, it is very difficult to envisage the possibility of suitability fast and frequent bus connectivity between Heyford Park and Oxford, recognising that efforts might alternatively be focused on maintaining and improving services along the main road corridors, most notably the A34/41 and the A44 (see key figures in the Transport Study, 2022, also shown [here](#)). Key quotes from the County Council include:

“OCC have serious concerns about the severe traffic impact at Middleton Stoney and surrounding villages that additional development at this location could have...”

“Any new allocation... would need to provide a package of mitigation including as a minimum... Such a package is unlikely to be viable for a new site of 1,250 homes... It is also worth highlighting it is likely that sustainable transport solutions may not be effective in fully mitigating the traffic impacts of the development, given the location.”

“Existing commitments to an attractive level of public transport to and from the site have not been met to date and OCC is experiencing difficulty in identifying a bus operator to continue the current service, the future viability of which is uncertain.”

Secondly, the site promoters have made clear that their vision for Heyford Park involves comprehensive growth involving at least an additional 6,000 homes beyond what is already committed. The site promoters had been intending to submit a planning application for a scheme of that size, as discussed [here](#), but that now appears to be delayed, potentially in light of the Governments' New Towns Task force, which is seeking submissions for potential New Towns involving at least 10,000 homes. Major growth involving an additional 6-10,000 homes could be transformational in terms of both trip internalisation / self-sufficiency and transport connectivity, and there is also a need to note the context of a possible strategic rail freight interchange (see latest updates [here](#) and [here](#)) as well as current pending speculative planning applications for employment sites adjacent to Junction 10 of the M40. However, it is well-beyond the scope of the current LPR to consider an allocation of 6,000+ homes at Heyford Park, not least because of the timing aspect (i.e. given a clear case against delaying the plan to allow further

consideration of the issues/options). It is also important to note that the Government has committed to a new plan-making regime involving preparation of strategic (sub-regional) plans to feed-into and inform the preparation of local plans, and a future strategic plan would clearly be an appropriate forum for exploring issues/options.

Rural area

The rural area has seen significant growth over recent years, plus there is extensive committed growth, primarily from non-allocated ('speculative') sites that have gained planning permission at appeal under the presumption in favour of sustainable development. This suggests limited strategic case for supporting further growth in the rural area through the LPR, and this argument is bolstered on the basis of the discussion above, which has identified supply options from higher order settlements.

However, on the other hand, recent and committed growth in the rural area is unevenly distributed, and there can be village specific arguments for growth (to meet housing needs, including affordable housing, to deliver on objectives relating to infrastructure and village services/facilities, and generally to help maintain village vitality). Furthermore, development sites at villages tend to benefit from strong viability (such that they can deliver on affordable housing and wider policy asks), low delivery risk and an ability to deliver relatively early in the plan period, which is an important consideration given that elsewhere there is a focus on strategic sites that will deliver later in the plan period, plus there are currently constraints to early delivery at Bicester and Kidlington, as discussed. Finally, there is a need to recognise that a number of Parish Councils are not only willing and able to prepare a neighbourhood plan that allocates sites for development but are keen to do so given NPPF para 14 (protection from the presumption in favour).

As such, for each of the category A villages there is a clear need to consider growth options on their merits and consider whether growth might be supported either through an LPR allocation or the assignment of a housing requirement to the Parish Council.

The main report considers villages in turn, and in each case concludes that there is a logic to the emerging proposed approach to assigning housing requirements (or, in the case of Bletchington, allocating one site through the LPR). Overall, the emerging proposed approach is to direct 565 homes to the rural area through the LPR, over-and-above completions and commitments totally 1,773 homes. There is a case for exploring lower growth (also potentially allocating through the LPR at certain villages), perhaps most notably at Adderbury and also potentially at Bloxham, Hook Norton and Melcombe (as a category B village), but lower growth scenarios would only involve modestly fewer homes.

Borough-wide growth scenarios

Section 5.5 identifies reasonable combinations of the sub-area scenarios that then form the reasonable growth scenarios for the District. There are 9 feasible combinations, and all would deliver a reasonable quantum of homes once account is also taken of completions and commitments (21,402 homes) and a windfall assumption (1,400 homes), hence there are nine reasonable growth scenarios, as set out below.

A final consideration is employment land, with a number of omission sites warranting ongoing consideration, including land to the east of Bicester and to the east of Banbury, but on balance there is not considered to be a reasonable higher growth scenario.

Table B: The reasonable growth scenarios

Scenario		1	2	3	4	5	6	7	8	9	
Completions & commitments		21,402	21,402	21,402	21,402	21,402	21,402	21,402	21,402	21,402	
Windfall		1,400	1,400	1,400	1,400	1,400	1,400	1,400	1,400	1,400	
Strategic Allocations	Banbury	770	770	770	770	770	770	770	770	770	
	Bicester	0	0	0	800	800	800	1000	1000	1000	
	Kidlington	GB	0	300	2,000	0	300	2,000	0	300	2,000
		Non-GB	450	450	450	450	450	450	450	450	450
	Heyford Park	0	0	0	0	0	0	0	0	0	0
Rural area		565	565	565	565	565	565	565	565	565	
Total homes		24,587	24,887	26,587	25,387	25,687	27,387	25,587	25,887	27,587	
Per annum		1,118	1,185	1,266	1,209	1,223	1,304	1,218	1,233	1,314	
% over 20,029		23%	30%	39%	33%	34%	43%	34%	35%	44%	

Growth scenarios appraisal

The table (or 'matrix') below presents a summary of the appraisal of reasonable growth scenarios presented above. The table includes a row for each component of the SA framework (introduced above), and within each row, the aim is to **1**) rank the scenarios in order of performance (with a star indicating best performing and "=" used where it is not possible to differentiate with confidence); and then **2**) categorise performance in terms of significant effects using **red** (significant negative) / **amber** (moderate/uncertain negative) / **light green** (moderate/uncertain positive) / **green** (significant positive) / no colour (neutral).

It is important to be clear that the appraisal is not undertaken with any assumptions made regarding the degree of importance / **weight** that should be assigned to each of the topics, such that the intention is not that the matrix should be used to calculate a total score for each of the scenarios (and, in any case, any attempt to do so is complicated by a need to account for both order of preference and conclusions reached on significant effects).

The appraisal shows a mixed picture, but it is immediately apparent that **Scenario 1** has merit given it: is the preferable scenario under the greatest number of topics (7); and has equal fewest predicted negative effects (3). However, there is some uncertainty because Scenario 1 is the lowest growth scenario such that there would not be flexibility to provide for any unmet housing need from Oxford City beyond that which is already committed (4,400 homes). Equally, under **Scenario 8**, which is the highest growth scenario, there is considerable uncertainty regarding what weight to give to the fact that there would be flexibility to provide for further unmet need (should it be established that there is further unmet need). There is a strong case to suggest low likelihood of further unmet need, but the possibility of further unmet need cannot be ignored, because planning proactively for unmet need is important for the achievement of a wide range of sustainability objectives.

Having made these overarching points, the following bullet points consider topics in turn:

- **Air quality** –the proposed allocations that feature across the scenarios give rise to limited concern, and higher growth at Bicester could assist with delivering a link road to reduce traffic through the town. As such, the appraisal reflects the fact that air quality is a key issue in Oxford such that there is a case for the Cherwell LPR including flexibility for further unmet need from Oxford, notwithstanding the uncertainties.
- **Biodiversity** – under this heading it is difficult to conclude that higher growth aimed at allowing flexibility for further unmet need is a significant factor (also, higher growth in Cherwell District would require careful consideration from a perspective of avoiding air pollution from traffic impacting Oxford Meadows SAC). As such, the order of preference reflects a view that Shipton Quarry (in particular) and SE Bicester stand-out as subject to significant or notable biodiversity constraint.

Table C: The reasonable growth scenarios – summary appraisal findings

	1	2	3	4	5	6	7	8	9
	Constants only	Kidlington	Shipton Quarry	SE Bicester	SE Bicester, Kidlington	SE Bicester, Shipton Quarry	Wendlebury	Wendlebury, Kidlington	Wendlebury, Shipton Quarry
Air / env quality	2	1★	1★	1★	1★	1★	1★	1★	1★
Biodiversity	1★	1★	3	2	2	4	1★	1★	3
Climate change adaptation	1★	1★	1★	1★	1★	1★	2	2	2
Climate change mitigation	=	=	=	=	=	=	=	=	=
Communities	1★	2	2	1★	2	2	2	2	2
Economy & employment	=	=	=	=	=	=	=	=	=
Historic env	1★	2	2	1★	2	2	2	2	2
Homes	9	8	7	6	5	4	3	2	1★
Land	1★	2	1★	2	3	2	1★	2	1★
Landscape	1★	2	2	2	2	2	1★	2	2
Transport	1★	1★	1★	1★	1★	1★	1★	1★	2
Water	2	3	1★	1★	3	1★	1★	3	1★

- **Climate change adaptation** – flood risk is the focus here, and there is a clear need to flag a concern with the option of strategic growth at Wendlebury. The site promoters suggest the potential for mitigation, and the assumption here (for the purposes of the appraisal) is a reduced scheme to ensure that flood risk is avoided (which leads to a delivery risk), but overall it is appropriate to flag a residual risk.
- **Climate change mitigation** – all of the variable sites would involve strategic growth and/or growth in areas with strong development viability, such that there would be good potential to deliver net zero development to an exacting standard (particularly net zero achieved onsite, i.e. without resorting to offsetting, and otherwise in line with the energy hierarchy). Hence there is a case for higher growth. However, the lower growth scenarios would allow space for a future sub-regional strategic plan to consider growth locations in and around Oxford with a focus on minimising both built environment and transport-related greenhouse gas emissions. With regards to the predicted ‘moderate or uncertain’ negative effect across the scenarios, this is a reflection of the established need to take urgent action through spatial strategy / site selection in order to deliver local plans that align with national and local decarbonisation commitments and targets (notably the District’s ambition to achieve net zero by 2030). This being the case, there is a high bar to predicting even a neutral effect against the objective.
- **Communities** – all or most of the variable sites could deliver significant new community infrastructure alongside new homes. However, in each case this would be of somewhat limited significance, e.g. none would deliver a new secondary school to address an existing local need. As such, the order of preference reflects a view that planning for higher growth at this stage would generate considerable local concern, given the uncertainty that exists around Oxford City’s next steps. Also, SE Bicester was previously an allocation and generated relatively low levels of concern locally.
- **Economy and employment** – under all scenarios there would be a suitably proactive approach to employment land allocations, which are extensive reflecting the buoyant and nationally significant sub-regional economy (Oxfordshire Knowledge Spine and Oxford to Cambridge Arc). There would be a significant supply boost relative to the Draft Plan stage, but there remains a case for additional supply, and a case can be made for supporting all of the variable growth locations, e.g. with Shipton Quarry and Kidlington falling within the Oxford Knowledge Spine, and higher growth at Bicester is potentially supportive of employment growth objectives (including if growth helps to fund a new southern link road). Shipton Quarry (in particular) and Wendlebury might deliver new employment land, but there is much uncertainty. There is also broadly a case for a higher housing growth strategy in support of the sub-regional economy, but there are also major uncertainties, as discussed in Section 5.2 of the main report.

- **Historic environment** – all of the variable site options are subject to a degree of constraint, and this is also the case for allocations that are held constant across the scenarios. However, of the variable site options it is considered appropriate to highlight SE Bicester as subject to the least constraint, i.e. focusing growth here could be seen as a proactive means of delivering growth whilst minimising impacts.
- **Homes** – the order of preference reflects the fact that there are a range of arguments for higher growth, which can be summarised as: A) affordable housing needs; B) potentially case to be made around growth ambitions linked to economic development; and C) residual uncertainties in respect of unmet need. Also, there is a need to note the Government’s draft new standard method figure for the District, which if left unchanged would be 38% higher than the existing figure that is the primary basis for the plan, and another consideration is high rates of recent housing delivery (although it is important to note that delivery rates have recently decreased significantly).

It is not clear that any of the sites additionally allocated under Scenarios 2 to 9 would deliver early in the plan period, but there is nonetheless a ‘housing’ case to be made by committing early to sites that will deliver in the longer term.

Having said this, even Scenario 1 performs well in absolute terms, because there would be potential to set the housing requirement at a figure reflecting: A) Cherwell’s standard method housing need in full (2023 standard method); and B) the existing agreed unmet need from Oxford (4,400 homes). Furthermore, there would be a larger (23%) ‘supply buffer’ over-and-above the requirement as a contingency for delivery issues, which is an important factor given known delivery challenges.

- **Land** – Wendlebury is shown by the nationally available low resolution dataset to comprise lower quality agricultural land, and there is also a clear case for directing growth to Shipton Quarry. Overall though, there will be a significant loss of best and most versatile agricultural land under all of the growth scenarios.
- **Landscape** – all of the variable growth locations are subject to a degree of landscape constraint, but there is a case to suggest that directing growth to Wendlebury could represent a proactive approach to delivering housing growth whilst minimising landscape impacts, including accounting for the River Ray flood plain, which would entirely contain growth, i.e. avoid any risk of future development creep / sprawl.
- **Transport** – there is a transport-case to be made for all of the variable growth locations (Kidlington – proximity to Oxford and employment areas; Shipton Quarry – rail connectivity; SE Bicester – A41 and link road funding; Wendlebury – A41, employment areas, link road funding and potentially link road delivery).

Furthermore, there is a transport-case for planning for increased flexibility in respect of unmet need, given the importance of minimising commuting for employment, and because long term certainty around growth locations is conducive to effective strategic transport planning. However, the pragmatic reality is that higher growth scenarios would mean delaying the plan considerably in order to allow for further detailed transport modelling and consultation/engagement with key partner organisations. Delaying the plan would then lead to a risk of development continuing to come forward in sub-optimal locations under the presumption in favour of sustainable development.

- **Water** – the appraisal reflects issues affecting Oxford Sewage Treatment Works (STW), albeit there is likely to be a technical solution in time (at a cost and with associated risks to funding and delivery). This may lead to an argument against supporting growth at Kidlington (which may drain to Oxford STW) and an argument for higher growth scenarios that would provide flexibility for potential further unmet need.

The preferred approach (text provided by CDC officers)

The preferred approach is **Scenario 1**, which the appraisal indicates strong for support for. Whilst certain arguments for higher growth scenarios are accepted, there is no clear case for higher growth at the current time, given current understanding of housing needs and ahead of knowing Oxford City's next steps, including in respect of whether they will look to plan for standard method LHN or a higher figure. The proposed Local Plan Review is considered to represent a positive approach to providing for development needs and is considered to be justified in that it represents *“an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence”* (NPPF para 35).

SA findings at this stage

Part 2 of the SA Report presents an appraisal of the Local Plan Review as a whole.

Appraisal of the Proposed Submission Local Plan Review

This section is an opportunity to take account of development management policies (both district-wide/thematic and, crucially, site-specific) which are not entirely taken into account as part of the growth scenarios appraisal (to ensure a level playing field). Having done so, it is possible to reach more positive conclusions for the plan as a whole under a number of headings relative to the conclusions reached for Scenario 1 above.

Table D: Comparison of conclusions reached for Scenario 1 and the LPR as a whole

Topic	Conclusion on Scenario 1	Conclusion on the LPR
Air / env quality		
Biodiversity		
CC adaptation		
CC mitigation		
Communities		
Economy		
Historic env		
Homes		
Land		
Landscape		
Transport		
Water		

Also, within Part 2 of the Report it is important to give stand-alone consideration to 'cumulative effects', i.e. the effects of the LPR in combination with other plans and programmes, not least the Oxford City Local Plan and local plans prepared by the other Oxfordshire Districts. There are clearly a range of key considerations, including relating to: housing needs, the sub-regional (and even national) economy, key transport corridors, landscape scale nature recovery, agricultural land and the water environment.

Next Steps

Once the period for representations on the Local Plan Review / SA Report has finished the intention is to submit the plan for examination in public alongside a summary of the main issues raised through the Regulation 19 publication period. Once found to be sound following examination the Local Plan will be adopted, at which time an SA 'Statement' will present prescribed information including "measures decided concerning monitoring". At the current time the main report suggests a number of monitoring indicators in light of the appraisal above, e.g. monitoring employment land needs and supply is key locally.