

# Sustainability Appraisal (SA) of the Cherwell Local Plan Review

## SA Report

December 2024



**Cherwell**  
DISTRICT COUNCIL  
NORTH OXFORDSHIRE

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Quality information

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# 1 Introduction

## 1.1 Background

- 1.1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Cherwell Local Plan that is being prepared by Cherwell District Council (EEBC).
- 1.1.2 Once adopted, the plan will set the strategy for growth and change for the District up to 2042, allocate sites to deliver the strategy and establish policies against which planning applications will be determined.
- 1.1.3 SA is a mechanism for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. SA is required for local plans.<sup>1</sup>

## 1.2 SA explained

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

## 1.3 This SA Report

- 1.3.1 Following a draft plan consultation in late 2023, the Council has now prepared the final draft ('proposed submission') version of the plan for 'publication' under Regulation 19 of the Local Planning Regulations.
- 1.3.2 As such, this is the formal SA report. It presents an appraisal of "the plan and reasonable alternatives", along with other prescribed information, aimed at informing representations and plan finalisation.<sup>2</sup>

### Structure of this report

- 1.3.3 This report is structured in **three parts** in order to answer the questions above in turn.
- 1.3.4 Before answering the first question there is a need for two further introductory sections:
  - Section 2 – introduces the plan scope.
  - Section 3 – introduces the SA scope.
- 1.3.5 It should be noted that this report is structured identically to the Interim SA Report from 2023.

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

<sup>2</sup> See **Appendix I** for a 'checklist' explaining more precisely the regulatory basis for presenting certain information.

## 2 The plan scope

### 2.1 Introduction

- 2.1.1 The aim here is to briefly introduce the context to plan preparation, including the national context of planning reform; the plan area (ahead of more detailed discussion of key issues elsewhere in the report); the plan period; and the objectives that are in place to guide plan preparation (the ‘plan scope’).

### 2.2 Context to plan preparation

- 2.2.1 Once in place the Cherwell Local Plan Review (LPR) will be known as the Cherwell Local Plan 2042, and will largely supersede the adopted local plan, comprising the Cherwell Local Plan (adopted in 2015) and its Partial Review (adopted in 2020, dealing with Oxford’s unmet housing needs), which look to 2031. The requirement to regularly review the local plan stems from paragraphs 22 and 69 of the NPPF, which require local plans to look ahead over at least a 15 year period, and paragraph 33, which states: *“Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy...”*
- 2.2.2 A key task is to consider allocation of new sites to deliver growth over-and-above ‘completions’ (i.e. sites that have already been delivered since the start of the plan period, which is 2020) and ‘commitments’ (i.e. sites with an extant planning permission or allocation). Focusing on planning for new homes, this ‘existing supply’ totals 21,402 homes,<sup>3</sup> and another ~1,400 homes can be assumed over the plan period from windfall sites (i.e. sites not currently committed or allocated in the plan). Furthermore, there is a need to consider *when* the existing supply is due to come forward and seek to bolster the supply trajectory through the LPR, with a view to a steady trajectory over the entire course of the plan period (although there is flexibility in respect of identifying supply to provide for the housing requirement in the latter years of the plan period, given the potential to bolster supply for these years through one or more plan reviews).
- 2.2.3 In short, key context to plan preparation is the need to identify a robust supply of homes and also other forms of development over-and-above completions and commitments. But how much development is required? In answer to this question, the first point to note is that central to the NPPF is a requirement for authorities to take a positive plan-led approach to development, with an up-to-date local plan that provides for development needs in full, or otherwise as far as is consistent with sustainable development.
- 2.2.4 The plan is being prepared under the December 2023 NPPF. Whilst a new draft version of the NPPF was published for consultation on 30<sup>th</sup> July 2024, and its direction of travel is acknowledged (also read in the context of a broader understanding of the Government’s direction of travel in respect of planning reform), the outcomes of the Draft NPPF consultation cannot be foreseen. Also, the Draft NPPF presents ‘transitional arrangements’ to enable well-advanced local plans to be finalised and examined under the 2023 NPPF, and there is the strong potential for these arrangements to apply to the Cherwell Local Plan.
- 2.2.5 Alongside the Draft NPPF the Government also published a new standard method for calculating local housing need (LHN) although, again, the first point to note is that transitional arrangements mean that the intention is for the Cherwell Local Plan to be finalised and examined in the context of the existing standard method, which generates an LHN figure of 706 dwellings per annum (dpa). Nonetheless, the potential implications of the draft new standard method are a consideration for the Local Plan, and Cherwell’s *draft* figure is 1,095, which amounts to a 55% increase. Furthermore, all neighbouring local authorities see significant increases to LHN under the draft method, most notably: South Oxfordshire (108%), West Oxfordshire (62%), Vale of White Horse (48%), Buckinghamshire (42%) and Oxford City (38%).
- 2.2.6 There is also a need to recognise that the Draft NPPF (2024) includes a new emphasis on effective cooperation between neighbouring local authorities in respect of strategic cross-border issues, not least providing for housing need. There has always been a Duty to Cooperate under the NPPF, and in 2015 Cherwell District agreed to deliver 4,400 homes to meet a proportion of Oxford City’s unmet housing need to 2031, but there is a new national emphasis. Matters are discussed further below, and are somewhat complex, but the simple point to note is that there is a risk (albeit potentially small) of Oxford City generating further unmet need and a case being made for *a proportion* of this flowing to Cherwell District.

<sup>3</sup> Also, a further 4,300 homes permitted at North West Bicester are expected to deliver post 2042.

- 2.2.7 The next matter to consider is the urgency of adopting the LPR in order to avoid a situation whereby the District is subject to the Presumption in Favour of Sustainable Development (NPPF paragraph 11), such that the Council finds it much more difficult to defend against planning applications that do not accord with the adopted Local Plan. Sub-optimal developments being permitted under 'the presumption' (otherwise known as the 'tilted balance' in favour of development) have been a major issue over recent years, for example leading to issues around infrastructure capacity (e.g. schools capacity), environmental impacts and the alignment of growth with transport / net zero objectives. Furthermore, defending planning refusals taken to appeal (because the applicant expects that the Planning Inspector overseeing the appeal will apply the presumption, known as 'planning by appeal') involves significant expense, with a recent [Appeals Progress Report](#) noting that the council had spent £313,000 on defending appeals in 2024 alone.
- 2.2.8 The presumption applies if and when the District is unable to demonstrate a five year housing land supply (5YHLS) as measured against the standard method housing need (other than in the Kidlington area, where housing need currently also accounts for the aforementioned 4,400 homes unmet need from Oxford), and the situation has recently improved because of sites gaining permission (mostly at appeal) such that they can count towards the 5YHLS calculation. However, there is a risk of the situation worsening future, such that the District as a whole is once again subject to the presumption, for two reasons. Firstly, there are currently barriers to permitting and delivering sites in both Bicester (including grid capacity) and the Kidlington area (including Oxford sewage treatment works capacity). Secondly, once the NPPF is adopted it is likely that a new higher standard method figure will apply, which will worsen the District's 5YHLS position, and likely to a significant extent. The way to address this situation (short of simply granting permission to ad hoc / speculative planning applications) is to adopt a Local Plan Review post haste.
- 2.2.9 To summarise the discussion so far, there is considerable 'top down' pressure to adopt a local plan that identifies a supply of land sufficient to provide for development needs in full, and there is also considerable 'bottom up' pressure in the sense of a need to avoid the presumption in favour of sustainable development.
- 2.2.10 Finally, key context comes from the need to adopt a local plan that delivers on priority objectives regardless of pressure from central government or concerns about avoiding a future under the presumption. The Local Plan Review objectives are set out below, but key considerations include:
- Providing for housing need is not only important in-and-of itself, but also due to wide-ranging secondary benefits, for example in terms of delivering affordable housing and supporting the local economy.
  - Plan-led housing growth creates an opportunity to strategically target investment infrastructure such that the benefits of growth are realised in a way that far exceeds what can be achieved under a scenario whereby growth comes forward piecemeal.
  - A local plan is an opportunity to consider development viability in a strategic way, such that a considered approach can be taken to policy 'asks' including housing mix, affordable housing, net zero development, biodiversity net gain and space / accessibility standards.
  - The LPR is a key opportunity to ensure a strategic approach to employment land, with a view to maximising benefits to Cherwell and the Oxford sub-region, which is of national importance.

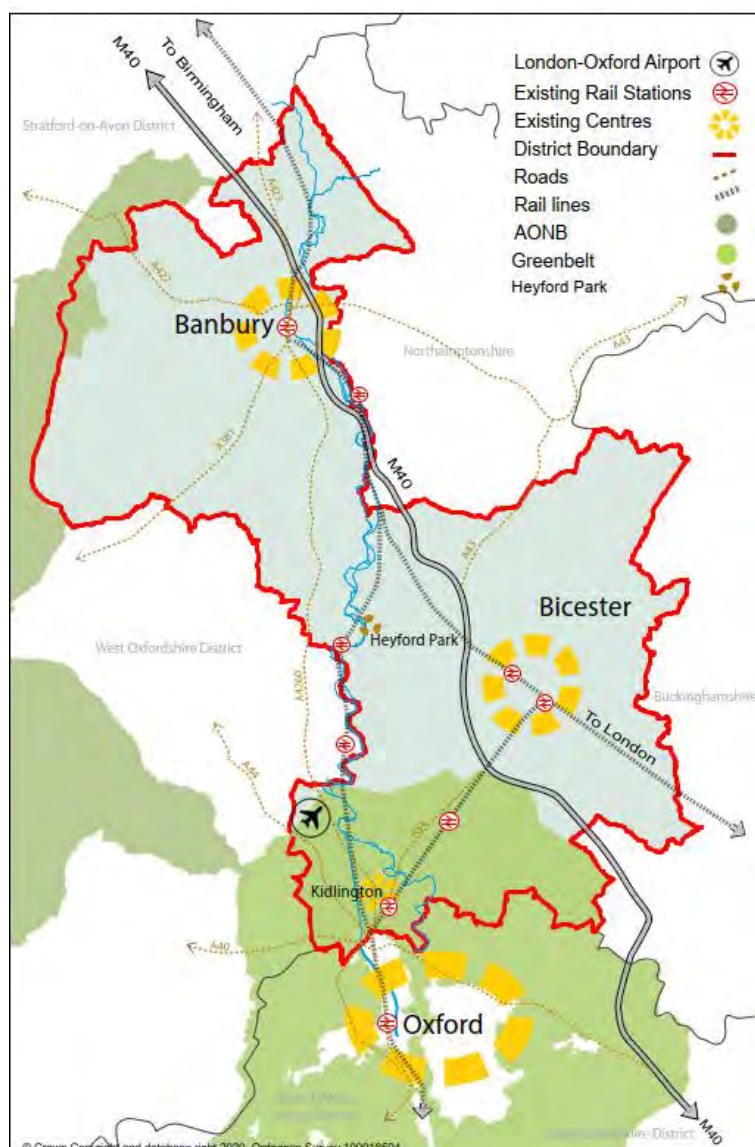
## 2.3 The plan area

- 2.3.1 Although it is one of the fastest growing areas in the South East, Cherwell remains a predominantly rural District. It has a population of approximately 150,000 people mainly concentrated in the three urban centres of Banbury, Bicester and Kidlington. Banbury is the largest settlement with 32% of the population, Bicester has 24% and Kidlington 13%. The rural area accounts for the remaining 31% of the population.
- 2.3.2 Over the last twenty years the population of Cherwell has grown by over 16% and it is forecast to grow further to approximately 170,000 by 2043. Much of this increase is as a result of significant housing and employment growth directed by previous local plans, particularly at Banbury and Bicester. The argument for growth largely reflects the District's location at the fulcrum of two nationally significant 'knowledge sector' economic growth areas: the Oxford to Cambridge Arc and the Oxfordshire Knowledge spine.
- 2.3.3 Much of Cherwell has excellent transport links, with the M40 passing close to Banbury and Bicester, direct rail links from Banbury and Bicester to London, Birmingham and Oxford, and an East West Rail (EWR) link between Bicester and Milton Keynes soon to open. The Oxford to Bicester EWR link is already running, via a new station at Oxford Parkway (close to Kidlington), which links to London via Bicester.



- 2.3.4 The District is characterised by distinctive and diverse towns and villages, with a total of 80 town and parish councils. Most of the villages and hamlets retain their traditional character and, in total, there are 60 conservation areas and approximately 2,300 listed buildings. There is also a large number of scheduled monuments (38) and nationally registered parks and gardens (10), plus there is a civil war Registered Battlefield, and Blenheim Palace World Heritage Site is adjacent to the District boundary. Also, Bicester Airfield and former RAF Upper Heyford are of national historic importance.
- 2.3.5 Cherwell's natural environment is also varied and highly valued, including as a contributor to local character and due to generating wide-ranging 'ecosystem services'. The River Cherwell and Oxford Canal run north-south through the District; there are Ironstone Downs in the north west (including a very small area within the Cotswolds National Landscape); the Ploughley Limestone Plateau features in the east; and in the south is the expansive low lying landscape of the Upper Ray Meadows and Otmoor.
- 2.3.6 Part of the internationally important Oxford Meadows Special Area of Conservation (SAC) lies in the south west of the District, north of the boundary with Oxford City, and there are also several nationally designated Sites of Special Scientific Interest (SSSIs) as well as a network of locally designated sites, concentrations of non-designated 'priority habitat' and wider landscape-scale areas of biodiversity importance.
- 2.3.7 Much of the southern part of the District lies within the Oxford Green Belt, and the relationship between this area and the internationally important city of Oxford is an ongoing strategic planning consideration. The Local Plan (2015) directed growth, over the period 2011-31 primarily to Bicester (44%) and Banbury (32%), as well as to Upper Heyford (10%), but the Partial Review (2020) then allocated a further 4,400 homes in the Kidlington area to meet the District's share of Oxford City's unmet housing need.

**Figure 2.1:** The plan area (N.B. does not show EWR east of Bicester)



## 2.4 The plan period

- 2.4.1 The plan period is 22 years from 2020 to 2042, in line with NPPF paragraph 22 which states that plans “*should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.*”
- 2.4.2 Also, there is a need to be mindful of the second half of NPPF paragraph 22, which states: “*Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.*”

## 2.5 Plan objectives

- 2.5.1 The plan objectives are broadly unchanged from 2023. The following are modestly abridged:

- Meeting the challenge of **climate change** and ensuring **sustainable development**
  - Promote **net-zero carbon** new developments, with the highest possible sustainable construction standards, nature based solutions and low embodied carbon to ensure new developments... support a local zero-carbon energy [and prioritise] community energy.
  - Deliver developments that efficiently use local natural resources (particularly water), that minimise and are resilient to the **impacts of climate change**, including extreme weather events....
  - Deliver developments that make a positive contribution to Cherwell's **nature recovery** through protection, restoration and expansion of protected sites, habitats and species.
  - Improve air quality, maximise opportunities for biodiversity net gain and enhance **natural capital assets**, such as soils, watercourses, woodlands, hedges and ponds... capture and store carbon.
  - Maintain and improve the natural and **built and historic environment** including biodiversity, landscape, and green and blue infrastructure networks by ensuring new development achieves high-quality design standards, and conserves and enhances the natural, historic, cultural and landscape...
  - Prioritise **active travel** and increase the attraction of, and opportunities for **public transport**, ensuring high standards of connectivity and **accessibility** to services for all. Reduce dependency on the private car as a mode of travel, facilitating the creation of a net-zero-carbon transport network.
- Maintaining and developing a sustainable **local economy**
  - Support a strong and sustainable economy within the district and wider Oxfordshire... including the visitor economy, agriculture... food production... [ensure] land is allocated to **meet identified needs**.
  - Increase **education, training and skills**, and encourage investment in the local workforce; improve and enhance digital connectivity and infrastructure.... reduce inequality and... unnecessary transport.
  - Strengthen the role of Cherwell's **urban centres**, including where beneficial, redevelopment and renewal, to maintain and enhance their vitality, viability, distinctiveness and safety.
  - Recognise the economic benefits of preserving and enhancing the **character and beauty** of Cherwell's built and natural heritage, and landscape, and the wider benefits from its natural capital and ecosystem services to ensure Cherwell remains attractive... as a place to live, work and visit....
- Building healthy and sustainable **communities**
  - Meet the **housing needs** of all... in a way that creates sustainable, well-designed, safe, inclusive and mixed communities, promoting inter-generational connectivity and lifetime neighbourhoods.
  - Create sustainable, well-designed, safe, distinctive **places** where healthy behaviours (being active, having opportunities to access a healthy diet, and having good social connections) are the norm...
  - Focus development in sustainable **locations**, making efficient and effective use of land, conserving and enhancing the countryside, landscape... natural environment... the setting of towns and villages.
  - Protect and enhance the **historic environment**, including protecting and enhancing cultural heritage assets and archaeological remains, and promoting inclusive access to local assets where appropriate.
  - Provide sufficient accessible... good quality **services, facilities and infrastructure**, to meet health, education, transport, open space, sport, recreations, cultural, social and other community needs.



## 3 The SA scope

### 3.1 Introduction

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

### 3.2 Consultation on the scope

- 3.2.1 The Regulations require that: *“When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA Report], the responsible authority shall consult the consultation bodies”*. In England, the consultation bodies are the Environment Agency, Historic England and Natural England. As such, these authorities were consulted on the SA scope in 2020; this involved publication of a Scoping Report, which was then subsequently updated to reflect comments received. The SA scope was then slightly adjusted ahead of publication of the Interim SA (ISA) Report in 2021.

### 3.3 The SA framework

- 3.3.1 Table 3.1 presents the list of topics/objectives that represents the core of the SA framework. The list of objectives is unchanged from that presented in the Scoping Report, but the objectives were rearranged ahead of preparing the Interim SA Report in 2021, as was explained at the time and also within the subsequent Interim SA Report published in 2023. Both reports invited comments on the SA framework and the SA scope in general, but no comments were received through either consultation.

**Table 3.1:** The SA framework

Topic	Objective
Air and wider env quality	<ul style="list-style-type: none"> <li>Protect and where possible improve air quality and prevent light pollution</li> </ul>
Biodiversity	<ul style="list-style-type: none"> <li>Conserve and enhance biodiversity and geodiversity</li> </ul>
Climate change mitigation	<ul style="list-style-type: none"> <li>Minimise contribution to climate change</li> </ul>
Climate change adaptation	<ul style="list-style-type: none"> <li>Support adaptation to unavoidable climate change</li> <li>Reduce the risk from all sources of flooding</li> </ul>
Communities	<ul style="list-style-type: none"> <li>Create and sustain vibrant communities including preventing noise pollution</li> <li>Reduce crime and disorder and the fear of crime</li> <li>Ensure that digital infrastructure meets the needs of current and future generations</li> <li>Maintain and improve levels of education and skills in the population overall</li> <li>Improve the health and wellbeing of the population and reduce inequalities in health</li> <li>Reduce poverty and social exclusion</li> </ul>
Employment & the economy	<ul style="list-style-type: none"> <li>Ensure high and stable levels of employment across the district</li> <li>Encourage innovation and support competitiveness, productivity and growth.</li> </ul>
Historic env	<ul style="list-style-type: none"> <li>Protect, enhance and make accessible for enjoyment, the district's historic environment</li> </ul>
Homes	<ul style="list-style-type: none"> <li>Ensure the opportunity to live in a decent, sustainably constructed and affordable home</li> </ul>
Land, soils & resources	<ul style="list-style-type: none"> <li>Conserve and enhance soil and the efficient use of land</li> <li>Reduce waste generation and disposal, and achieve the sustainable management of waste</li> </ul>
Landscape	<ul style="list-style-type: none"> <li>Protect and enhance landscape character and the district's countryside</li> </ul>
Transport	<ul style="list-style-type: none"> <li>Support efficient movement patterns, sustainable travel and reduced need to travel by car</li> </ul>
Water	<ul style="list-style-type: none"> <li>Maintain and improve water quality and resources</li> </ul>

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

## 4 Introduction to Part 1

### Overview

- 4.1.1 Work to prepare the Local Plan Review (LPR) has been underway since 2020 with three formal consultations under Regulation 18 prior to this current consultation under Regulation 19, and two Interim SA Reports have been published prior to this current SA Report. However, the aim here is not to relay the entire backstory, nor to provide an 'audit trail' of steps taken. Rather, the aim is to report work undertaken to examine **reasonable alternatives** ahead of the current consultation. Specifically, the aim is to:
- explain the reasons for selecting the alternatives dealt with – see **Section 5**
  - present an appraisal of the reasonable alternatives – see **Section 6**
  - explain the Council's reasons for selecting the preferred option – see **Section 7**
- 4.1.2 Presenting this information is in accordance with the requirement for the SA Report to present an appraisal of reasonable alternatives and “*an outline of the reasons for selecting the alternatives dealt with*”.

### Reasonable alternatives in relation to what?

- 4.1.3 The legal requirement is to examine reasonable alternatives (RAs) taking account of “*the objectives and geographical scope of the plan*”, which suggests a need to focus on the **spatial strategy**, i.e. providing for a supply of land, including via **site allocations** (NPPF para 69), to meet objectively assessed needs and wider plan objectives. Establishing a spatial strategy is clearly a central objective of the LPR.<sup>4</sup>
- 4.1.4 Spatial strategy alternatives can be described as “**growth scenarios**” and can also be described in summary as **alternative key diagrams**. This approach was taken in the Interim SA (ISA) Report (2023) and was generally well received, although there was some criticism from those with a site-specific interest.
- 4.1.5 Historic England notably stated: “*We broadly support the SA, including its focus on growth scenarios and helpful narrative. That said, as acknowledged in the SA, there are many different scenarios, which make it challenging to retain the thread of key details between the options.*” We agree that there were too many growth scenarios in 2023 (12) and at the current time the aim is to arrive at a more manageable number.

#### What about site options?

- 4.1.6 Whilst individual site options generate a high degree of interest, they are not RAs in the context of most local plans. Were a local plan setting out to allocate one site, then site options would be RAs, but that is rarely the case and is not the case for the Cherwell LPR. Rather, the objective is to allocate a **package** of sites to meet needs and wider objectives, hence RAs must be in the form of alternative **packages** of sites, in so far as possible. Nonetheless, consideration is naturally given to the merits of site options as part of the process of establishing reasonable growth scenarios – see Sections 5.3 and 5.4.

#### Is the focus on housing sites?

- 4.1.7 Establishing a supply of land to meet housing needs (alongside infrastructure delivery, place-making etc) is invariably a key issue, and the growth scenarios defined, appraised and published for consultation in 2023 varied only in respect of housing sites, with the approach to supply in respect of other development needs was held constant. However, at the current time it is recognised that there are significant choices in respect of employment land, particularly for warehousing and distribution uses, hence options / growth scenarios are focus of discussion below. Also, there is a need to consider Gypsy and Traveller needs.

#### What about other aspects of the plan?

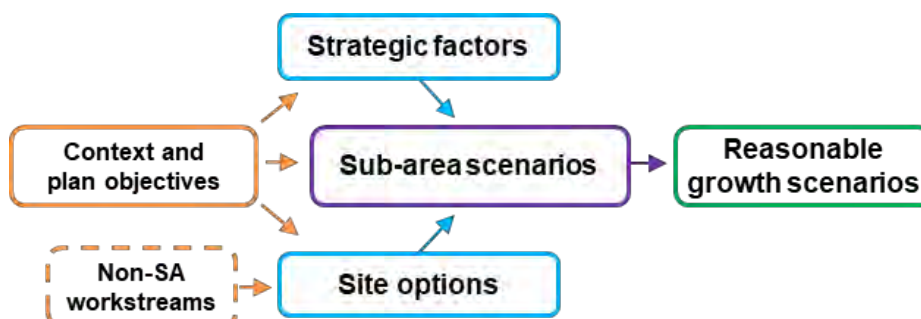
- 4.1.8 As well as establishing a spatial strategy, allocating sites etc, the Local Plan must also establish policy on thematic district-wide issues, as well as site-specific policies. Broadly speaking, these can be described as development management (DM) policies. However, it is a challenge to define “reasonable” DM policy alternatives, and, in this case, none are identified (N.B. this was also the case within the 2023 ISA Report).<sup>4</sup>

<sup>4</sup> Another consideration is a need to focus only on alternatives that are meaningfully different to the extent that they will vary in terms of ‘significant effects’ on the baseline, where significance is defined in the context of the plan. Alongside, it can be noted that ‘do nothing’ cannot be appraised as a reasonable alternative to ‘do something’ because ‘do nothing’ is the baseline.

## 5 Defining growth scenarios

- 5.1.1 The aim here is to discuss the process that led to the definition of reasonable growth scenarios in 2024. To reiterate, growth scenarios equate to **reasonable alternatives**.

**Figure 5.1:** A standard broad process to define reasonable growth scenarios



- 5.1.2 This process is described across the following sub-sections:

- **Section 5.2** – explores **strategic factors** with a bearing on growth scenarios.
- **Section 5.3** – considers individual **site options**, as the ‘building blocks’ of growth scenarios.
- **Section 5.4** – draws upon the preceding two sections to consider options/scenarios for **sub-areas**.
- **Section 5.5** – combines sub-area scenarios to form **reasonable growth scenarios**.

- 5.1.3 With regards to the **context**, the first point to note is context provided by work completed in 2023 to define, appraise and consult upon a set of 12 reasonable growth scenarios – see Figure 5.2. In some respects, the work reported below is an update to that presented in Section 5 of the Interim SA Report in 2023; however, the aim is to present analysis that is fully up-to-date and ‘policy relevant’ given latest evidence.

- 5.1.4 A second point to make, regarding context to the process of defining growth scenarios, is that consultation responses received in 2023 are a key input, and a key aim is to quote consultation responses.

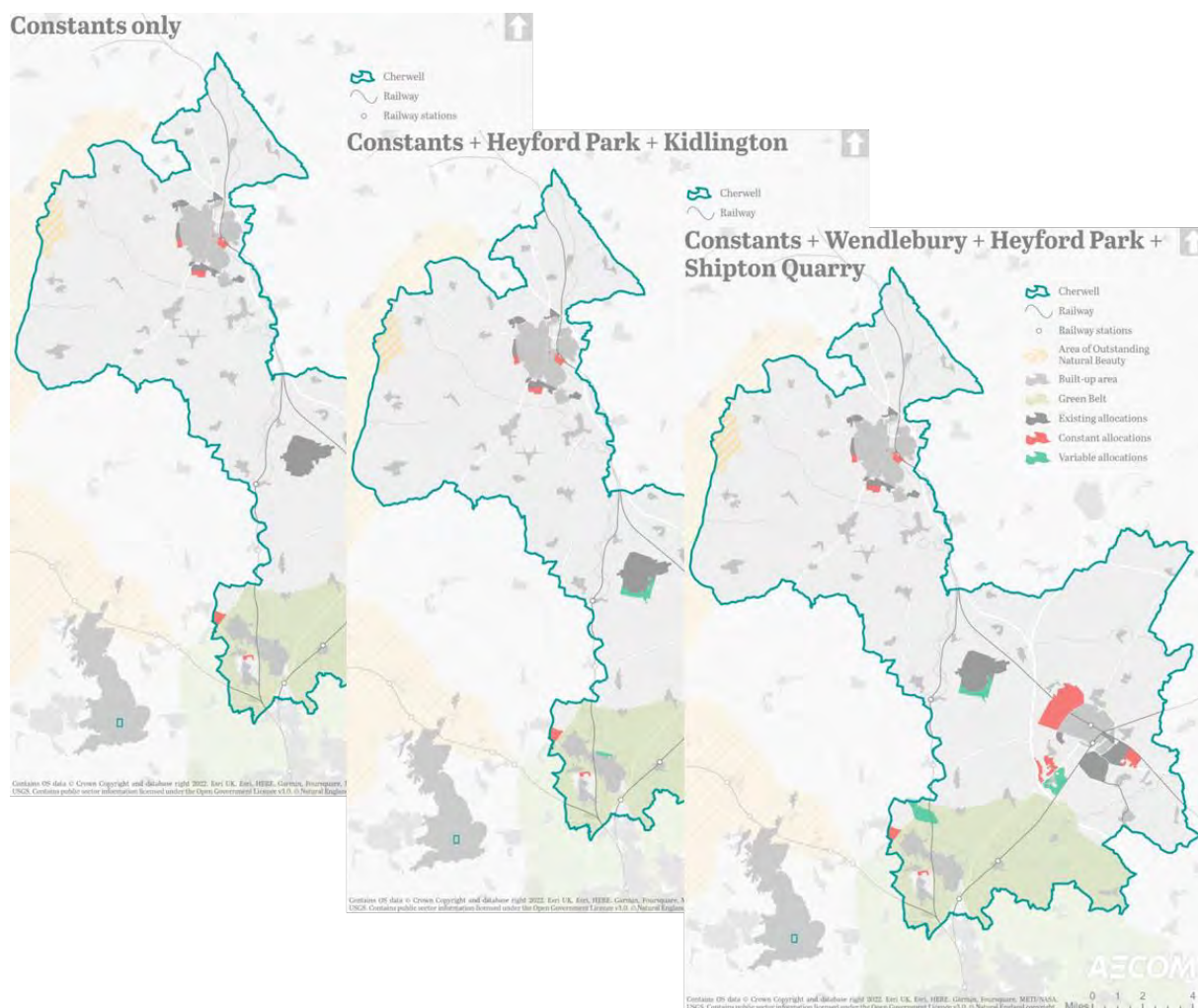
- 5.1.5 Thirdly, there is a need to acknowledge that numerous ‘non-SA’ workstreams must feed-in, but there are invariably challenges in terms of timing. Key workstreams underway in the latter half of 2024 to account for as part of work to define RA growth scenarios, as far as practically possible, include the following:

- Housing and Economic Land Availability Assessment (HELAA) – this is a key workstream that serves to identify a shortlist of site options (and presents analysis for each). See further discussion in Section 5.3.
- Scheme specifics – generating an understanding what specific site options would or could deliver (e.g. in terms of land uses and infrastructure) involves a detailed process, and attention naturally focuses on emerging proposed allocations more so than emerging omission sites. However, it is both emerging proposed allocations and emerging omission sites that must be a focus of the process set out below.
- Infrastructure Delivery Plan (IDP) – infrastructure planning is a major undertaking for any local plan, and the reality is that the complexity of the work means that there is a pragmatic need to focus attention on the emerging preferred approach, with limited if any potential to explore alternative growth scenarios. Also, the reality is that the IDP must be completed late in the day, once the preferred approach is near-finalised, taking into account a range of other workstreams; hence integrating the IDP as part of work to define and appraise reasonable alternative growth scenarios is invariably a challenge.

### A note on limitations

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

**Figure 5.2:** Work to explore growth scenarios in 2023 is a key input to the process of defining scenarios in 2024



## 5.2 Strategic factors

### Introduction

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

- Quantum – how many new homes are needed (regardless of capacity to provide them)?
- Broad spatial strategy – broadly where is more/less suited to growth, and what typologies are supported?

### Quantum

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

**N.B.** it is important to emphasise that this section does not aim to conclude on the question of how many homes should be provided for across the reasonable growth scenarios. Rather, the aim is to present an initial high level discussion, to essentially frame subsequent discussion of broad strategy options, site options and sub area scenarios. It is only *then* that a conclusion can be drawn (see Section 5.5).

### Background

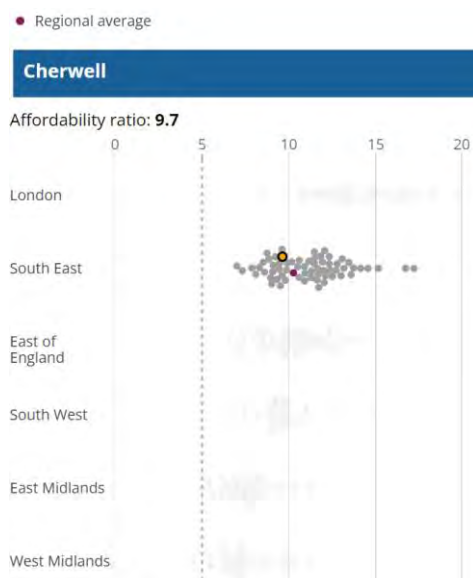
5.2.3 A central tenet of local plan-making is the need to **A)** objectively establish housing needs ('policy-off'); and then **B)** develop a policy response to those needs. The Planning Practice Guidance (PPG) explains: *"Housing need is an unconstrained assessment of the number of homes needed in an area. Assessing housing need is the first step in the process of deciding how many homes need to be planned for. It should be undertaken separately from... establishing a housing requirement figure..."*

- 5.2.4 With regards to (A), the NPPF (paragraph 61) states that **LHN** should be established via an assessment “conducted using the **standard method**” unless there are “*exceptional circumstances, including relating to the particular demographic characteristics of an area which justify an alternative approach...*”
- 5.2.5 With regards to (B), many local authorities will respond to assessed LHN by providing for LHN in full or, in other words, setting a **housing requirement** that equates to LHN, and a **housing supply** through policies sufficient to deliver this housing requirement (over time, i.e. year-on-year, which will typically necessitate putting in place a ‘buffer’ to mitigate against the risk of unforeseen delivery issues). However, under certain circumstances it can be appropriate to set a housing requirement that departs from LHN.

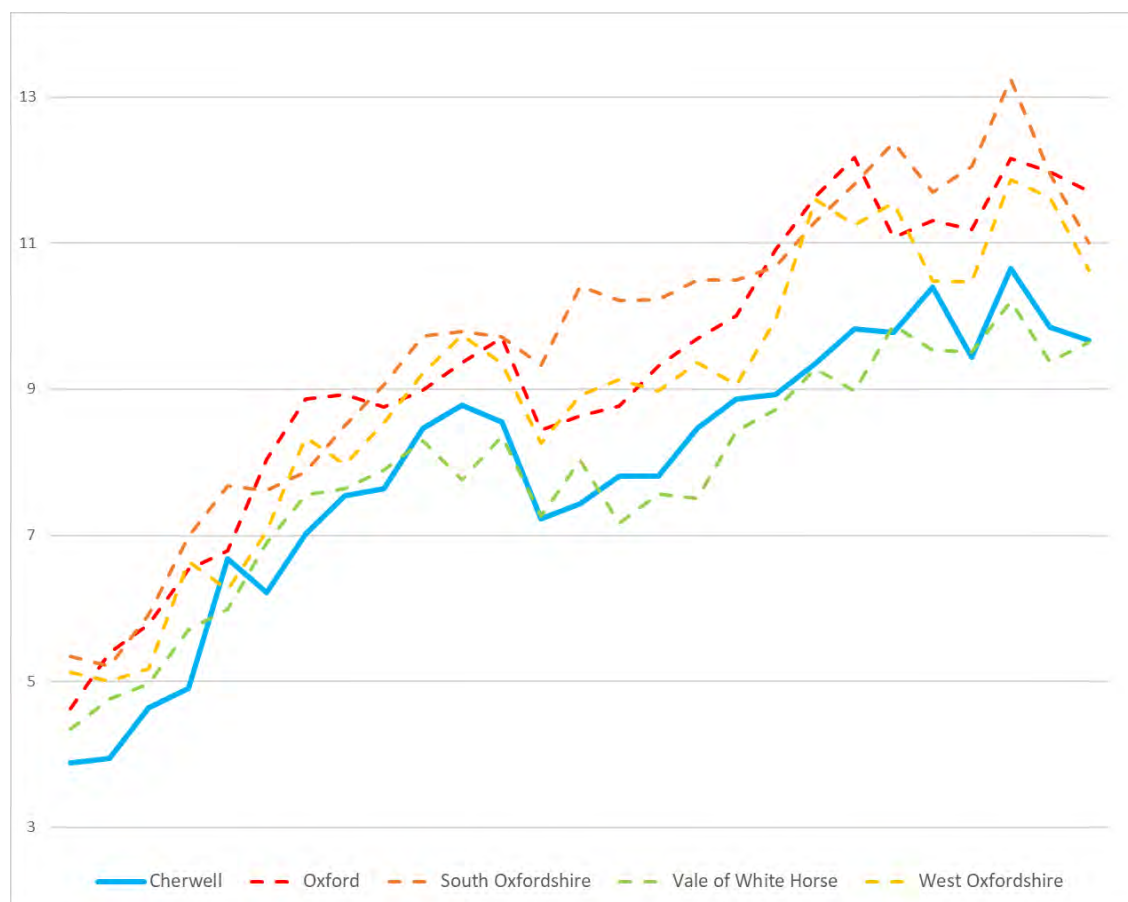
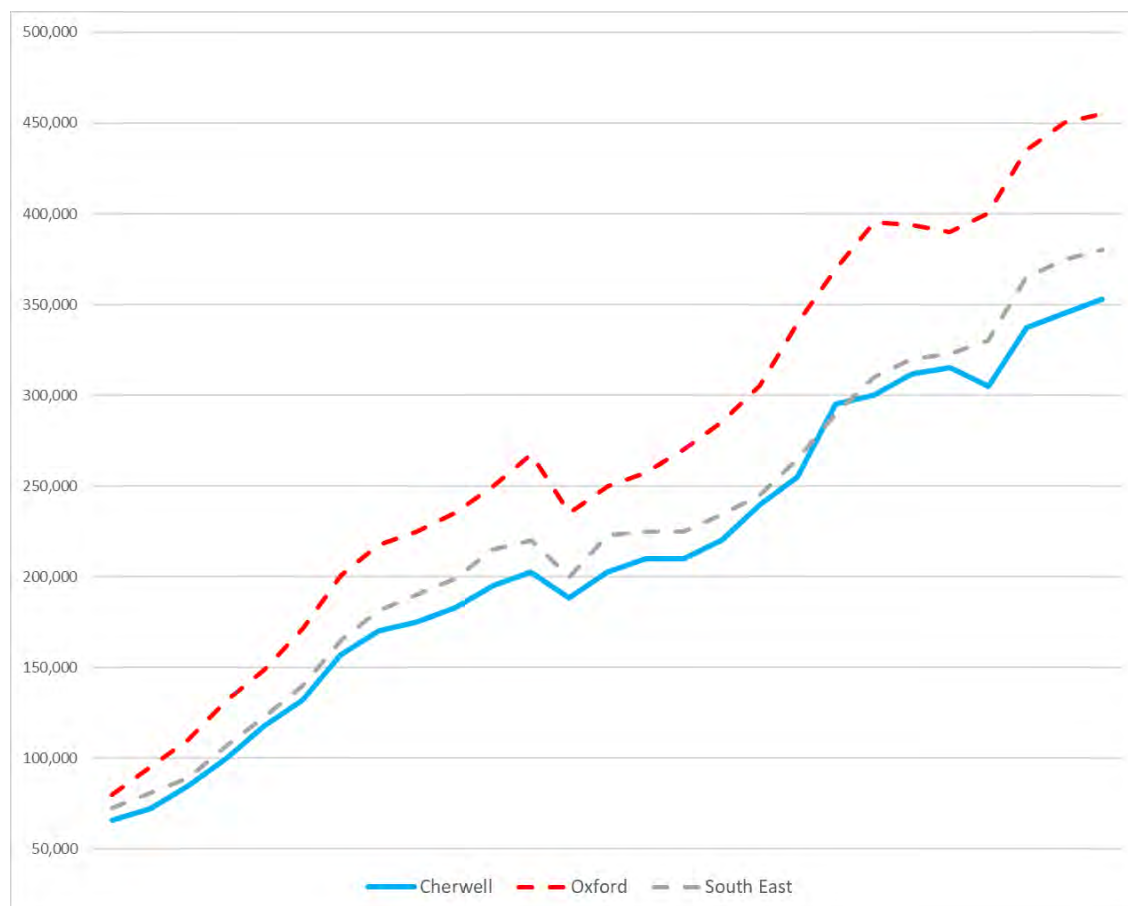
### Cherwell’s Local Housing Need (LHN)

- 5.2.6 A three-step standard method for calculating LHN was first published by the Government in 2017, and then a fourth step was added in 2020 (see the Planning Practice Guidance, PPG). This fourth step, known as the ‘cities and urban centres uplift’, does not have a bearing on the calculation of Cherwell’s LHN.
- 5.2.7 There have also been some notable changes to guidance in respect of the data that should be utilised as an input to the standard method since the method was first introduced. Specifically, following a consultation in late 2018, the PPG was updated to require that the household growth projections used as an input to the method must be the 2014-based projections, rather than more recent projections.
- 5.2.8 The standard method derived LHN for the District is currently 706 dwellings per annum (dpa) and this figure can be projected forward for the remaining 18 years of the plan period. Also, standard method LHN was slightly higher over the first four years of the plan period (756 dpa, 713 dpa, 742 dpa, 710 dpa), such that total standard method housing need for the 22 year plan period is **15,629 homes**. This is an uncapped figure, meaning that step 3 of the standard method (“Capping the level of any increase”) does not apply.
- N.B. this figure is slightly reduced from 2023 in light of the most recent ‘affordability ratios’ released by the Office for National Statistics (ONS), which influences step 2 of the standard method. The ratio of house prices to salaries paid locally is currently 9.7, which is higher than the national average but below the average for the South East (Figure 5.3). Also, the ratio has been quite stable over recent years (Figure 5.4), which is in contrast to some other parts of the South East. Whilst house prices have been increasing, so have local salaries, and house prices increases have been below the South East average (Figure 5.5).
- 5.2.9 Under the 2023 NPPF there is flexibility to calculate LHN using an alternative methodology, but there is no clear case for doing so at the current time. Whilst work in 2022 through a Housing and Economic Needs Assessment (HENA) suggested the potential for housing need to be higher, including on the basis of 2021 Census data (rather than the 2014-based household projections that are the default basis for the standard method) the HENA is no longer supported as a source of evidence, after significant issues with the methodology were raised recently through the Oxford Local Plan Examination in Public. That said, the evidence from the Census showing 3,200 more households in Cherwell than were predicted to exist under the 2014-based projections (HENA Table 7) potentially remains of note.

**Figure 5.3: Cherwell’s affordability ratio in context (source: ONS)**



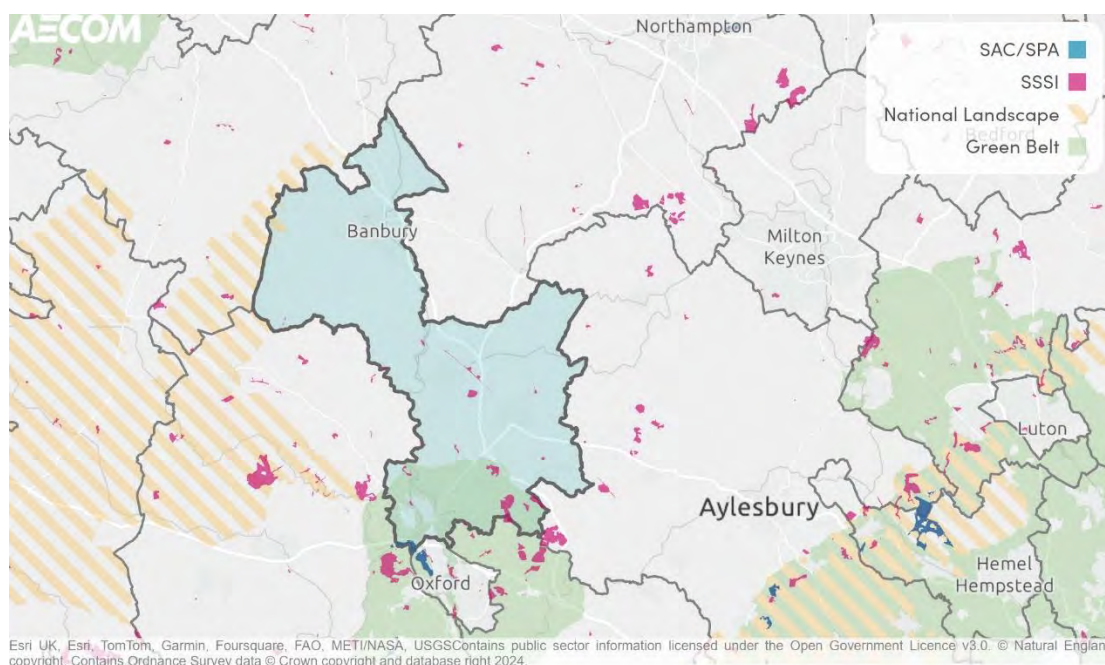


**Figure 5.4:** Cherwell's affordability ratio 1997-2023 alongside the other Oxfordshire authorities**Figure 5.5:** Cherwell's median house price 1997-2023 alongside Oxford and the South East

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

- 5.2.10 Paragraph 11 of the NPPF states: “... *strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, **unless**: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*” [emphasis added]
- 5.2.11 Cherwell District is overall not heavily constrained by NPPF “*policies... that protect areas or assets of particular importance...*” There are parts of the District that are constrained in this regard, including the Oxford Green Belt (where there are also significant biodiversity constraints and quite extensive flood risk), but equally extensive less constrained parts of the District. Also, there is a need to consider constraints to growth affecting Cherwell not only in an absolute sense, but also relative to neighbouring areas that would come under pressure to provide for any unmet need generated (Figure 5.6).
- 5.2.12 Furthermore, there is a need to consider recent rates of housing delivery, which averaged 1,119 dpa over the period 2019/20 to 2023/24 (accounting for 792 homes in 2023/24) and that the reasonable alternative growth scenarios defined and appraised in 2023 (Part 1 of the Interim SA Report, 2023) explored scenarios that would see a boost to delivery well beyond this (albeit in the context of the now withdrawn HENA).
- 5.2.13 Finally, and to reiterate, providing for LHN is an important means of delivering on a wide range local, regional and national objectives. In this regard it is clearly the case that the new Government is aiming to limit flexibility for local authorities to set a housing requirement below LHN (indeed, there has been much discussion over recent months regarding Government support for “mandatory housing targets”, although we interpret this as primarily relating to mandatory application of the standard method for the purposes of calculating LHN, as opposed to mandating that all housing requirements are set at LHN).
- 5.2.14 In conclusion, growth scenarios involving setting the housing requirement below LHN are unreasonable. In short, the primary reason is the limited extent of strategic constraints to growth.

**Figure 5.6:** A selection of strategic (NPPF footnote 7) constraints across the sub-region



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

- 5.2.15 NPPF paragraph 67 states [emphasis added]: “... *authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. The requirement may be higher than the identified housing need if, for example, it includes **provision for neighbouring areas** or reflects **growth ambitions** linked to economic development or infrastructure investment.*”

- 5.2.16 In this light, there is a clear basis for considering a housing requirement set above the standard method LHN figure discussed above, on account of unmet housing need from Oxford City. Indeed, the District has already agreed to provide for 4,400 homes unmet need from the City, such that there is a case for this being factored-in as a starting-point for the Local Plan Review, alongside LHN.
- 5.2.17 Specifically, there is a case for the LPR's starting point to be a 'need' figure comprising LHN plus unmet need, i.e.  $15,629 + 4,400 = 20,029$  homes (911 dpa over the 22 year plan period).
- 5.2.18 Indeed, this is a reasonable starting point.<sup>5</sup> As such, the question is whether there is a high level case for exploring setting a housing requirement set **above 20,029 homes**. There are five points for discussion.

#### Local housing need

- 5.2.19 Firstly, there is a need to note Cherwell's draft standard method LHN figure, which would be 1,095 dpa (if unchanged). The LPR is expected to be submitted and examined under the existing NPPF, such that standard method LHN is taken to be 706 dpa, but it is reasonable to acknowledge the draft higher figure.
- 5.2.20 Secondly, and to reiterate, Census data shows 3,200 more households in Cherwell in 2021 than were predicted by the 2014-based projections that are the basis for the current standard method. It is also noted that the ONS released population projections in 2024 that were high nationally (discussed here).

#### Recent rates of housing delivery

- 5.2.21 Recent rates of delivery have been high, as discussed above. However, the rate dropped considerably in 2023/24 and are anticipated to remain low for the next two or three years as there are barriers to permitting and delivering sites at both Bicester (grid capacity) and Kidlington (Oxford sewage treatment works).

#### Affordable housing need

- 5.2.22 Table 20 within the Cherwell Annual Monitoring Report (2023) sets out that an average of 218 affordable homes have been delivered per annum over the period 2020 to 2023, which amounts to 17.5% of homes being delivered as affordable (of which only a proportion will be for social rent, such that the homes are available to those in most acute need). In contrast, the Affordable and Specialist Housing Needs Assessment (2024) identifies a potential need for between 396 and 590 affordable homes per annum.
- 5.2.23 In this light, there is an 'affordable homes' argument for exploring growth scenarios involving setting the housing requirement at a figure above 20,029 homes (2020-2042), given that development viability (and competing policy asks with cost implications for developers) limits the rate at which affordable housing can be delivered, and recognising that the PPG states that a boost to the housing requirement "*may need to be considered where it could help deliver the required number of affordable homes*".
- 5.2.24 However, the question of 'uplifting' to reflect affordable housing needs is very complex, as succinctly explained recently by the West Berks Local Plan Inspector: "... *policy SP19 is expected to deliver a total of 2,190 affordable homes on market-led schemes... There would be a nominal deficit of around 3,420 against the identified need for... affordable homes although the link between affordable and overall need is complex as many of those identified as being in need of an affordable home are already in housing.*"

#### Unmet housing need

- 5.2.25 As discussed in the footnote below, there is a strong argument to suggest that there is no evidential reason to plan for further unmet housing need from Oxford City over-and-above the 4,400 homes already committed to. However, as discussed, this is on the basis of assumptions regarding Oxford City's need and supply figures. With regards to supply, there is little basis for questioning the 493 dpa figure discussed in the footnote, but there is a need to sensitivity test for a need figure above standard method (1,051 dpa).

<sup>5</sup> There is potentially a numerical argument for suggesting that housing requirement figures below 20,029 homes might be explored, reflecting the following factors: 1) It is likely that Oxford City's LHN comes from the new standard method, which is 1,051 dpa or 23,121 homes over the period 2020-2042; 2) Oxford City's supply over this period can be assumed to be in the region of 493 dpa so 10,846 homes in total (N.B. the recent Inspector's Letter discusses a slightly lower supply figure of 481 dpa, but it is understood that were proposing to update this to 493 dpa); and 3) the shortfall is 12,275 homes, which is less than the 14,300 homes unmet need already committed to be delivered across the four districts over the period 2020-2042. However, the difference between the committed unmet need supply (14,300 homes) and the potential unmet need figure (12,275 homes) is not very significant (~2,000 homes) once it is spread across the four districts, plus the above calculations are based on assumptions that can be called into question, e.g. Oxford City's need could be higher and/or supply lower, plus there are potentially uncertainties around the next steps of the other districts, noting high new standard method LHN figures.

- 5.2.26 For example, Oxford's existing Local Plan (2016-36) is based on a "need" figure of 1,346 dpa (see [Section 3](#) of the adopted Local Plan), although it can be questioned the extent to which this is a 'policy off' figure as opposed to a 'policy on' figure accounting for objectives around provision for affordable housing needs and economic growth objectives including linked to national Ox Cam Arc aspirations and the Oxfordshire Growth Deal (discussed below). Also, the outcome of the HENA (2022) was an identified need figure for Oxford City of 1,322 dpa, albeit on the basis of a methodology that now understood to have been flawed.
- 5.2.27 Were it to be assumed that Oxford City's LHN is ~1,300 dpa (in line with the two figures above) then this would lead to ~3,500 homes further unmet need over the period 2020-2042, which might then need to be spread across the four districts. This might be a fairly even distribution, but there is uncertainty, including noting that all three of the other districts may see a boost to standard method LHN over-and-above Cherwell District, most notably South Oxfordshire (108% increase under the draft standard method).
- 5.2.28 On balance though, it is *not* considered fair to assume a strong likelihood of Oxford City's LHN being significantly higher than the figure indicated by the new draft standard method. This is particularly on the basis of the [letter](#) written by the Local Plan Inspectors to Oxford City Council in respect of withdrawing the Local Plan in September 2024. The letter suggests a need to demonstrate 'exceptional circumstances' in order to plan on the basis of a housing need figure not derived from the standard method (although this can be debated) and then concludes at paragraph 47 that exceptional circumstances do not exist.
- 5.2.29 The most likely scenario is considered to be that Oxford City will undertake further plan-making on the basis of an assumption that need is understood from the standard method, e.g. the draft figure of 1,051 dpa which leads to no further unmet need over the period 2020-2042. At this time, Oxford City have not set out their next steps following the recommendation from their Inspectors to withdraw their Plan.<sup>6</sup>
- 5.2.30 In this regard, the following text from the Draft NPPF (2024) is of note (albeit subject to change plus the assumption is that the Cherwell LPR is being prepared under the 2023 version of the NPPF):

*"Plans come forward at different times, and there may be a degree of uncertainty about the future direction of relevant development plans or plans of infrastructure providers. In such circumstances strategic policy-making authorities and Inspectors will need to come to an informed decision on the basis of available information, rather than waiting for a full set of evidence from other authorities."*

#### *Economic development or infrastructure investment*

- 5.2.31 Whilst there is no clear case for boosting the housing requirement on account of unlocking or supporting infrastructure investment, the matter of supporting "growth ambitions linked to economic development" (NPPF para 67) is an important consideration. In 2023 the proposal was to boost the housing requirement on account of economy / employment grounds in light of the HENA and, whilst that study is now withdrawn as a source of evidence, that is not to say that there is no longer a case for doing so, including noting a potentially improving economic picture, as discussed below in Box 5.1.
- 5.2.32 The Oxford City Inspectors Letter focuses on:
- Commuting rates – the Oxford City Inspectors conclude that the HENA should have allowed for a continuation of high rates of in-commuting, rather than assuming that rates decrease leading to a need for additional homes locally in order to ensure a workforce sufficient to keep pace with jobs growth.
  - Employment rate – the Oxford City Inspectors conclude that the HENA should have assumed a higher rate, which would then have had the effect of reducing the number of new homes needed to fill new jobs.
- 5.2.33 The Inspectors refer to assumptions around both commuting rates and employment rates as representing a policy choice, and ultimately find the Oxford City Council choices to lack evidence/justification. However, policy choices are open to Cherwell District at the current time. In particular, there is an obvious policy choice in respect of supporting local jobs growth in order to reduce in-commuting. The Oxford Inspectors explain that "*net commuting into Oxfordshire in 2011 was 9,277, whereas in 2021 it was 16,994.*"
- 5.2.34 There is no potential to further specify what a boost to the Cherwell LPR housing requirement on account of "growth ambitions" might involve. However, there is a need to remain open to the possibility, subject to further work including by [OxLEP](#) (now a company owned by the County Council) at the Oxfordshire scale and, at the regional scale, England's Economic Heartland and the Oxford to Cambridge Partnership.

<sup>6</sup> Having said this, it is noted that Oxford City responded to the Inspectors letter stating their concern and alarm about the Inspector's conclusion that use of the standard method is appropriate in the Oxford context.



- 5.2.35 The following is a notable quote from the Cherwell Economic Needs Assessment (ENA, 2021):

*“Cherwell sits at the southern end of the Growth Corridor (Oxford to Cambridge Arc) which is one of the economic focuses of the UK moving forward, with the opportunity to make the most from the Science and Technology excellence across the region. This is effectively still in its infancy and so time will tell whether true economic gains will be made from this region... The development of Oxford Parkway railway station... has added a much needed transport link to the southern end of the District and has helped promote Kidlington as a hi-tech and laboratory user market.”*

- 5.2.36 Another source of evidence is the recently published Draft UK Industrial Strategy (2024), which sets out in the Executive Summary: *“A core objective of the industrial strategy is unleashing the full potential of our cities and regions. The industrial strategy will concentrate efforts on places with the greatest potential for our growth sectors: city regions, high-potential clusters, and strategic industrial sites.”*

- 5.2.37 Finally, whilst no organisations with a strategic focus on matters relating to the economy / employment responded to the Draft Plan consultation in 2023,<sup>7</sup> the Home Builders Federation (HBF) did notably state:

*“As the Council will be more than aware Oxfordshire is a key part of the UK’s economy with the Oxfordshire Local Industrial Strategy agreed with Government in 2019 and which built on the significant investment over recent years from the Oxfordshire Local Economic Partnership. In the absence of a strategic plan for the county it is therefore beholden on each LPA to now prepare local plans that continue to support these economic ambitions and ensure that a lack of housing in the county is not, as is stated in paragraph 81 of the NPPF, a barrier to the investment needed to achieve the level of growth expected.”*

- 5.2.38 The HBF go on to set out an argument for higher growth on economy/employment grounds (i.e. a level of growth over-and-above that which was proposed in the Draft Local Plan, 2023).

#### *The Oxfordshire Growth Deal*

- 5.2.39 In 2017 it was announced that Oxfordshire would receive up to £215m of new funding in order to support Oxfordshire’s ambition to plan for and support the delivery of 100,000 homes over the period 2011 to 2031.

- 5.2.40 However, there have been issues with delivering on the deal, such that whilst the Oxfordshire authorities have all adopted Local Plans since 2017 that commit to extensive growth, the headline target (2031 timeline) is not set to be achieved. In this regard, a letter from the Government in Dec 2022 explained:

*“... progress since that point has not been as positive as we had hoped for. The Deal set out two commitments by the Oxfordshire authorities: the submission and adoption of a joint statutory spatial plan and to plan for and support the delivery of 100,000 new homes between 2011 and 2031 – backed up with a credible plan for delivery. With your abandonment of the joint statutory spatial plan and the delay to your Local Plans (with some districts now planning to deliver this number of homes to a 2036 timetable), the Oxfordshire authorities have failed to deliver on both of these commitments.”*

- 5.2.41 The letter set out a new required profile for ‘accelerated housing’ and progress against this requirement was recently reported in the Future Oxfordshire Partnership Annual Report 2023/2024 (available [here](#)). It reports the number of homes accelerated and concludes: *“The original target for accelerated homes in the Housing and Growth Deal was 6,549 units, so we will exceed that by 1,780 homes.”*

- 5.2.42 On this basis, whilst the PPG specifically lists ‘housing deals’ as a circumstance *“when might it be appropriate to plan for a higher housing need figure than the standard method indicates”*, this is not thought to be a significant consideration with a bearing on the case for exploring Cherwell LPR growth scenarios involving supply sufficient to enable the housing requirement to be set at a figure above ‘need’.

#### **Conclusion on housing quanta options (high level)**

- 5.2.43 The situation has moved on since 2023, which creates a challenge for defining growth scenarios. However, on the basis of the discussion above, it is clear that growth scenarios must as a minimum involve a level of supply sufficient to enable the housing requirement to be set at 20,029 homes (2020 to 2042).

<sup>7</sup> One other relevant comments comes from Oxfordshire County Council: *“OCC responded to the Oxford City Council consultation on the jointly commissioned HENA in March 2023; our comments on the HENA also apply to this consultation. We expect the matter of what is the housing need number will need further work following comments made on this consultation and the Oxford Local Plan Regulation 19 consultation, and the likely subsequent examination of the Oxford Local Plan.”*

- 5.2.44 It is also reasonable to explore higher growth scenarios, particularly on the basis of: A) affordable housing needs; B) a potential case for growth ambitions linked to economic development; and C) residual uncertainties around unmet need. Further considerations relate to the Government's draft new standard method figure for the District and high rates of recent delivery (but rates have recently decreased).
- 5.2.45 The discussion above does not serve to indicate a reasonable high growth scenario, but a requirement set in the region of 25,000 homes, as a round number, might be considered reasonable. This would amount to a 60% increase on LHN (or a 25% increase on a 'need' figure that also accounts for the additional 4,400 homes unmet need). However, it is recognised that rolling forward the strategy from 2023 would mean a housing requirement set at around 28,000; also, the new draft standard methodology figure of 1,095 (if unchanged), taken alongside the committed 4,400 homes unmet need from Oxford, could suggest a housing requirement for the plan period of 27,031 ( $756 + 713 + 742 + 710 + 1,095 \times 18 + 4,400$ ).
- 5.2.46 The matter of precise quanta figures to reflect across the reasonable alternative growth scenarios is returned to within Section 5.5, subsequent to consideration of broad spatial strategy issues/options (the remainder of Section 5.2), site options (Section 5.3) and sub-area scenarios (Section 5.4).
- 5.2.47 Finally, the two boxes below consider two key aspects of wider development needs.

**Box 5.1: A note on employment land need**

The Economic Needs Assessment (2021) identifies a need for 187.5 ha of employment land in Cherwell over the period 2021 to 2040, which might be extrapolated to 2042 resulting in a need figure of ~207 ha. However, in October 2024 an update study was undertaken to account for updated economic forecasts, which show a considerable increase in jobs growth locally relative to the forecasts that underpinned the 2021 ENA, reflecting a more optimistic macro-economic outlook. This is then corroborated by recent completions data which shows an increase in employment completions in the three years since the completion of the ENA.

In summary, the latest forecast shows, growth of 20,100 jobs compared to 8,600 in the ENA, which results in a need for 250.5 ha of employment land to 2040, compared to 187.5ha in the ENA. This 250.5 ha figure can then be extrapolated to 2042, leading to an employment land need figure of **~277 ha**. This breaks down as: B1a (offices) – 30.8 ha; B1b – (R&D) – 33.6 ha; B1c/B2 (industrial) – 33.6 ha; and B8 (warehousing) – 59.4 ha. However, there is a need to caveat these figures by saying that other aspects of the ENA modelling have not been updated (only the Experian forecast), such that further work might result in a need to make adjustments.

Supply options are discussed below, but for context the key point to note here is that existing completions and commitments total in the region of 175 ha, such that the balance to be provided for through the LPR is in the region of **100 ha** (before consideration is given to the various categories of employment land).

This is a stretching target, but there is comfort in the knowledge that the plan can also include a permissive criteria-based policy supportive of windfall sites. Also, a further consideration is that assumptions regarding the developable area within employment sites could potentially be adjusted upwards if needs be.

**Box 5.2: A note on Gypsy and Traveller accommodation needs**

The most up to date assessment of need is a county-wide joint study commissioned in 2023 and covering the period 2042. The study addresses the need for gypsy and travellers, travelling showpeople and boat dwellers.

The needs of boat dwellers can be met through a criteria based policy, but: there is a need for 30 gypsy and traveller pitches, 10 of which need to be provided in the first 5 years of the plan period; and there is a need for 4 travelling showpeople plots of which none are required within the first five years. Importantly, the proposal is to account for the full cultural need, as opposed to only the needs of who meet the national 'planning definition'.

The study provides evidence on the potential supply of pitches identified through interviews and site information analysis. It indicates a potential supply of up to 33 additional pitches in Cherwell through the regularisation and expansion or intensification of existing sites, such that needs can be met without new allocations. It is also understood that there is no unmet need from Oxford, and no reason to suggest unmet need from elsewhere.

However, there is a need to remain alive to issues and opportunities, including recognising that: there are no public sites in the District; site size (and density) are important factors; and strategic housing-led and potentially also employment sites can give rise to an opportunity to deliver well-located new pitches.



## Broad spatial strategy

### Introduction

- 5.2.48 This is the second of two sections examining 'strategic factors'. The aim here is to present an overview of key broad spatial considerations with a bearing on the development of reasonable growth scenarios.
- 5.2.49 This section is broadly unchanged from the ISA Report (2023) and is structured so as to cover: 1) Cherwell's sub-areas; 2) the sub-regional context; and 3) overarching aims of the local plan review.

### Cherwell's sub-areas

- 5.2.50 There are five well-established sub-areas, which are discussed below beginning with a joint discussion of Banbury and Bicester. Also, a sub-section below introduces the possibility of a new settlement.

### Banbury and Bicester

- 5.2.51 Both towns have been a focus of growth over recent years and decades, but this has particularly been the case for Banbury. Over the period 2011 to 2024 Banbury saw 36.7% of completions compared to 29.6% at Bicester, and this accounts for an uptick in completions at Bicester since around 2020.
- 5.2.52 Nonetheless, there is a clear need to explore options that would see a further concentration of growth at both towns. Comparing the two:
- Banbury is the larger town, but Bicester has extensive commitments following the adopted Local Plan.
  - Bicester is associated with a more readily apparent strategic growth opportunity, given its Garden Town status and position within the Oxfordshire Knowledge Spine and the Oxford to Cambridge (Ox Cam) Partnership area. However, there are some strategic constraints, including relating to grid capacity and road infrastructure, such that delivery of committed sites has been significantly delayed. Committed sites have been delivering at Banbury in a timely manner, but there are also well understood constraints to further growth, including relating to the position of the town within the surrounding landscape(s).
- 5.2.53 The adopted Local Plan directs growth to Bicester more so than Banbury, and there is a case for rolling forward this strategy at the current time, notwithstanding the aforementioned constraints / delivery issues. One important broad strategic consideration is the emergence of Ox Cam Arc aspirations since the time of preparing the adopted Local Plan, and Bicester now benefits from an improved rail service (albeit this improvement was envisaged at the time of preparing the adopted plan).
- 5.2.54 It is also the case that the existing and committed employment offer at Bicester is very strong, with six strategic employment sites (Table 1 of the adopted Local Plan) totalling 138.5 ha, in comparison to a total of 48 ha at Banbury. There is a focus on warehousing and distribution uses, reflecting Bicester's excellent road links, which have a low jobs density, but Siemens is now delivering a high tech employment facility close to M40 J9, which is a positive step towards diversifying the local employment offer.
- 5.2.55 In summary, there are a range of high level arguments to support a focus of growth at Bicester over-and-above Banbury (which is not to suggest that there are not important growth-related opportunities at Banbury, perhaps most notably around town centre regeneration, as discussed further below). However, there are also wider factors that must be taken into account when considering more precisely the appropriate balance of growth between the towns – see further discussion in Section 5.4.

### Kidlington

- 5.2.56 The Kidlington area is set to see high growth over the plan period following the Partial Review (2020), which allocated land for 4,400 homes in the vicinity of Kidlington (although only a proportion directly abuts Kidlington). None of these homes have yet delivered, but given committed growth and wider factors the proposal is that Kidlington should sit within a second tier of the hierarchy as a 'service centre'.
- 5.2.57 Kidlington links closely with Yarnton (a category A village) and Begbroke (a category B village), as well as to land within Cherwell at the northern edge of Oxford (between Oxford and Oxford Parkway Station), including land allocated to come forward as an urban extension to Oxford. These settlements are all surrounded by the Oxford Green Belt. Also, Kidlington links to the village of Islip, where there is a train station, and to Woodstock, which is within West Oxfordshire and beyond the Green Belt.

- 5.2.58 The broad strategy was a focus of appraisal and consultation in 2021 (as per Bicester and Banbury), at which time the broad assumption was that Kidlington would see limited or low housing growth, given the Green Belt constraint (but there was consideration of Green Belt release for employment).
- 5.2.59 Kidlington is very-well linked to Oxford, via bus services along strategic road corridors, and via a strategic cycle route, plus Oxford Parkway Station is nearby. Furthermore, the Kidlington area is a significant employment hub, making a key contribution to the success of the Oxfordshire Knowledge Spine. In this light, the option of further strategic growth cannot be ruled out, despite the Green Belt constraint.

#### Heyford Park

- 5.2.60 Part of the former United States Airforce base of USAF/ RAF Upper Heyford was originally identified as a location for a new settlement in 1996, and by the time of the Local Plan (2015) 761 new homes had been consented along with the restoration and reuse of a further 296 former military dwellings. The Local Plan (2015) then allocated land for a further 1,600 homes and 1,500 jobs (building on the existing employment offer), through Policy Villages 5, with the Spatial Strategy explaining: *“Away from the two towns, the major single location for growth will be at the former RAF Upper Heyford base which will deliver 2,361 homes.”*
- 5.2.61 This led to permission being granted for a phased 1,175 home scheme in 2022 (ref. 18/00825/HYBRID) including a masterplan to guide the delivery of the 2015 allocation. It is important to note that the allocation and subsequent masterplan aim to respond to the very high degree of historic environment / heritage constraint affecting the former Cold War airfield, which contains three Scheduled Monuments, five Listed Buildings and many other non-designated heritage assets, and which is a conservation area in its entirety.
- 5.2.62 Given committed growth, Heyford Park is now designated as a service centre in the settlement hierarchy.
- 5.2.63 In parallel, the Cherwell LPR ‘Options’ consultation document (2021) gave high-level consideration to the possibility of additional strategic growth, taking into account the Oxfordshire Plan consultation document published in 2021. The Options consultation document presented two alternative courses of action – limit further growth beyond that which is committed or allocate land for further strategic growth – and these alternatives were appraised in the Interim SA Report published as part of the consultation.
- 5.2.64 The latest situation is that approximately 1,100 homes have been delivered (553 since the start of the plan period in 2020) and a further 1,048 homes are committed. In addition to the housing proposed, the approved masterplan includes 8.3ha of employment floorspace including a ‘Creative City’ area.
- 5.2.65 Also, the context is that: A) the Draft Local Plan (2023) proposed a 1,250 home extension on greenfield land to the south and east, but significant concerns were raised through the consultation including by the County Council and particularly in respect of poor transport connectivity / inadequate infrastructure; and B) the landowner has stated their intention to submit a planning application for a major larger scheme involving comprehensive planning for the airfield, involving an additional 6,000 homes or perhaps more.
- 5.2.66 The equivalent section of the Interim SA Report (2023) explained the following, which still holds true:
- “The adopted Local Plan allocation (2015) discussed the importance of “a comprehensive and lasting approach to the whole site” and securing “a lasting arrangement on this exceptional large scale brownfield site”. These sentiments hold true at the current time, i.e. there is potentially an opportunity for further growth in order to secure realisation of a vision for Heyford Park as a unique service centre, including one with a high proportion of local jobs per household. However, securing transport infrastructure upgrades, and better alignment with transport objectives more generally, is a prerequisite for further growth.”*

#### The rural area

- 5.2.67 There are three categories of villages within the rural area:
- Category A villages – Adderbury, Ambrosden, Bletchington, Bloxham, Bodicote, Deddington, Hook Norton, Launton, Steeple Aston and Yarnton.
- Of these, one village (Bodicote) naturally falls within the ‘Banbury sub-area’, two (Launton and Ambrosden) within the ‘Bicester sub-area’ and one (Yarnton) within the ‘Kidlington sub-area’. The other seven larger villages are considered under the ‘Rural sub-area’ heading in Section 5.4.
- Category B villages – certain of these are discussed under the Banbury, Bicester or Kidlington sub-area headings in Section 5.4, but the great majority fall under the ‘Rural’ sub-area heading.
  - Category C village – are small villages not well-suited to significant housing growth.

5.2.68 The villages (not including Kidlington or Heyford Park) are associated with very high recent and committed growth, largely on account of 'speculative' sites gaining planning permission at appeal (following a refusal by CDC) under the presumption in favour of sustainable development (see discussion in Section 2). Some of these sites are in sub-optimal locations, and piecemeal growth at villages in this way can put strain on infrastructure and the concern is that piecemeal growth at villages conflicts with well-established spatial strategy objectives including in terms of decarbonisation. Specifically, the numerical situation is:

- Completions since 2020 – 644 homes
- Current commitments – 1,129 homes
- Total completions and commitments at villages – 1,773 homes

5.2.69 This numerical situation serves to suggest limited argument for directing further growth to the villages.<sup>8</sup> However, on the other hand:

- Completions and commitments at the villages are very unevenly distributed, such that there are some villages where there is an argument for the LPR to support growth in order to provide for locally arising housing needs and support services/facilities and village vitality.
- Parish Councils often welcome a housing requirement which can then be delivered by allocations made through a neighbourhood plan. The motivation might be delivering on growth-related objectives (e.g. new infrastructure), but there is also the context of NPPF paragraph 14, which sets out that where a neighbourhood plan allocates sites to meet its assigned housing requirement then planning applications for housing are unlikely to be considered under the presumption in favour of sustainable development.
- Notwithstanding the delay created by allocations being made through a neighbourhood plan, small sites at the villages typically benefit from strong development viability and low delivery risk and are often able to deliver without delay. This is an important consideration for the LPR, as the plan will only be found to be sound at Examination in Public if the Inspector(s) are satisfied that there will be a five year housing land supply at the point of plan adoption, which could potentially prove challenging (subject to further discussions around the precise nature of the 5YHLS calculation).

5.2.70 Overall, there are broad strategic arguments for and against directing further growth to the villages through the LPR, but there are a range of more detailed considerations that must factor-in; see Section 5.4.

#### *New settlements*

5.2.71 The NPPF encourages consideration of new settlements (para 74), and the adopted Local Plan supported a new community at Heyford Park, but that represented something of a unique opportunity, as discussed. One other new settlement option was also considered at the time of preparing the Partial Review (see page 119 of the SA Report at that time) but rejected quite early in the process. Also, it is noted that all four of the other adopted Oxfordshire local plans include a focus on new settlements.<sup>9</sup>

5.2.72 The Draft Local Plan (2023) did not propose a new settlement, but the possibility was closely considered through work to define, appraise and consult upon reasonable growth scenarios. Specifically, two options were closely considered in Section 5 of the Interim SA Report – Shipton Quarry and Islip – before the option of a new settlement at Shipton Quarry was identified as preferable and progressed to the growth scenarios for appraisal and consultation.

5.2.73 Both options share the characteristic of being located in proximity to Kidlington and Oxford and, in turn, are located within the Green Belt. Islip benefits from a train station but has poor road connectivity. The land use at Shipton Quarry represents both an opportunity (the potential to make use of degraded land) but also an issue (there is biodiversity sensitivity) and much depends on potential to deliver a train station. The two options are discussed further in Section 5.4.

<sup>8</sup> The level of growth from completions and commitments is comfortably in excess of what was anticipated by the adopted Local Plan. Specifically, Policy Villages 2 stated: "A total of 750 homes will be delivered at Category A villages [to 2031]. This will be in addition to the rural allowance for small site 'windfalls' and planning permissions... as at 31 March 2014."

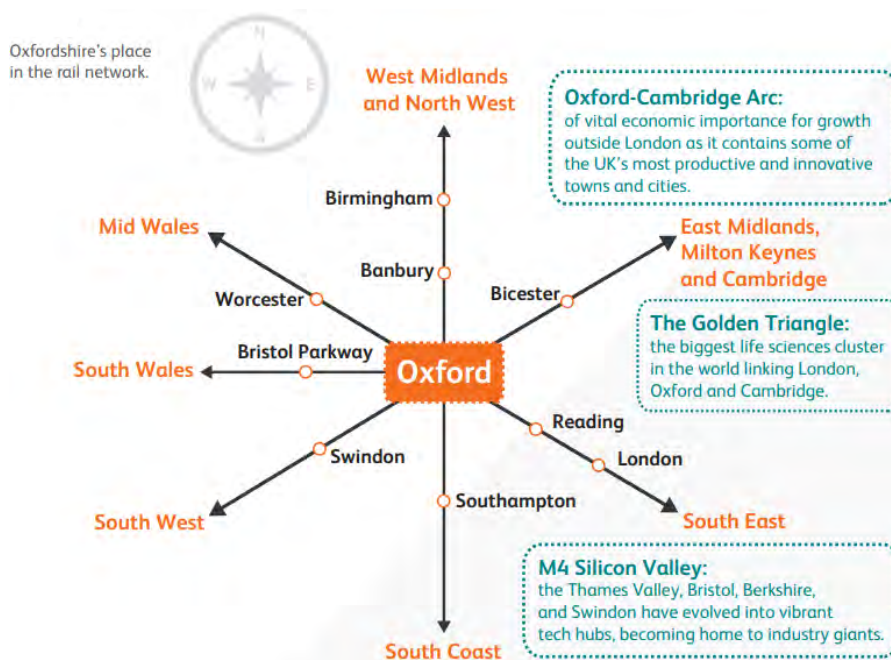
<sup>9</sup> The emerging South and Vale Joint Local Plan supports new garden villages at Dalton Barracks and Berinsfield (both existing allocations; neither entirely a new settlement) and the West Oxfordshire Local Plan Review 'Objectives and Ideas' consultation document (2023) explained: "We already have one new settlement identified in the current Local Plan which is Salt Cross Garden Village... This will deliver around 2,200 new homes, 40 hectares of business land in the form of a new science and technology park and a broad range of supporting services and facilities. The new Local Plan could potentially look to focus any additional growth (beyond existing commitments) into a second new settlement somewhere in the District."

## Subregional context

N.B. this discussion is unchanged from 2023.

- 5.2.74 The discussion above has already served to introduce a number of the 'larger-than-local' reasons for giving careful consideration to the scale, distribution and types of growth supported through the local plan. Key objectives relate to supporting economic growth, but there are also a range of wider objectives with a bearing on the question of how to distribute growth optimally, within the sub-region and within Cherwell.
- 5.2.75 The figure below is an introduction to Oxford, Banbury and Bicester's sub-regional links. Discussion under subsequent headings then gives consideration to key sub-regional strategies.

**Figure 5.7: Oxford in the sub-regional context, from the Oxfordshire ORCS, 2021**



### Oxford to Cambridge Arc / Partnership

- 5.2.76 In July 2021, the Government consulted on a 'vision' for the Arc, although anticipated subsequent work on 'spatial framework' was not progressed. Key figures within the Vision document deal with:
- **Productivity** – Figure 3.1 of the document shows that Gross Value Added (GVA) per capita is very high compared to the national picture and select other sub-regions nationally. The ambition was that: "By 2050, the Arc will be the world leading place for high-value growth, innovation and productivity."
  - **Economic clusters** – Figure 3.2 in the document shows the location of hubs for a range of key sectors, with the Oxfordshire Knowledge Spine clearly evident. Bicester is not explicitly shown, but it is important to note the level of committed employment growth: 119 ha as of 2021.
  - **Transport** – Figure 4.1 serves to clearly highlight a gap in east-west connectivity in the western part of the Arc, although this is set to improve upon opening of the Oxford to Bletchley section of East-West Rail. Poor connectivity is barrier to growth and leads to problematic traffic congestion along certain road corridors, including the A34 corridor, with implications for safety and bus services.
- 5.2.77 As well as an economic growth opportunity, the inherent characteristics of the Arc suggest an **environmental opportunity**. The Arc is broadly associated with a vale landscape associated with two river systems, bounded to the north and south by sensitive raised land. Within this vale landscape, in addition to the valued river corridors, a key defining feature is a series of three mid-vale ridges, associated with valued habitats and historic environment assets. In this light, there is an opportunity to develop and implement a vision that sees the Arc develop as one of the key national bio-regions, with clear goals set around biodiversity / nature recovery and wide ranging ecosystem service provision. In Cherwell, this translates as a need to recognise the Ox Cam Arc-wide strategic importance of the two key Thames tributaries – the Cherwell and the Ray – with perhaps the primary consideration being the Upper Ray Meadows, including Otmoor, and close links between this area and the Bernwood Forest.

5.2.78 More recently, the focus is on taking work forward through the Oxford to Cambridge Partnership.

#### *England's Economic Heartland*

5.2.79 England's Economic Heartland (EEH) is a partnership of councils and local enterprise partners, focused on coordinating investment in strategic infrastructure, particularly **transport infrastructure**. Oxfordshire is located at the southwest extent of the EEH area, on the boundary with Transport for the South East.

5.2.80 The EEH Regional Transport Strategy (2021) describes a "once in a generation opportunity" to:

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

5.2.81 The next stage of the Regional Transport Strategy will involve a series of Connectivity Studies for key corridors, with Cherwell intersecting three of the ten: the M40 corridor; the Oxford to Milton Keynes corridor; and the Peterborough – Northampton – Oxford corridor. [See latest [here](#)]

5.2.82 EEH has also recently published strategies for both bus and active travel. With regards to the active travel strategy, this includes a review of Local Cycling and Walking Implementation Plans (LCWIPs) in the area. In Cherwell LCWIPs have been completed for Bicester and Kidlington, and Banbury's is in preparation.

#### *Oxfordshire Local Enterprise Partnership (OxLEP)*

5.2.83 OxLEP was launched in 2011 and recently became a County Council-owned company following withdrawal of Government support for all LEPs nationally in 2023. OxLEP notably produced a Strategic Economic Plan in 2016, a Local Industrial Strategy (LIS) in 2019, a LIS Investment Plan in 2020 and a Net Zero report in 2021. The following, from the LIS Investment Strategy, is a summary of the ambition:

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

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

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

5.2.85 Elsewhere, the LIS Investment Plan explains: *"Oxfordshire's Local Industrial Strategy is built around the five pillars of Ideas, People, Business Environment, Infrastructure, and Place."* Investment priorities are then placed in a series spatial 'bundles', which can be seen in Figure 5.8. Bundles of key relevance are:

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



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

**Figure 5.8:** Priority investment bundles from the LIS Investment Plan



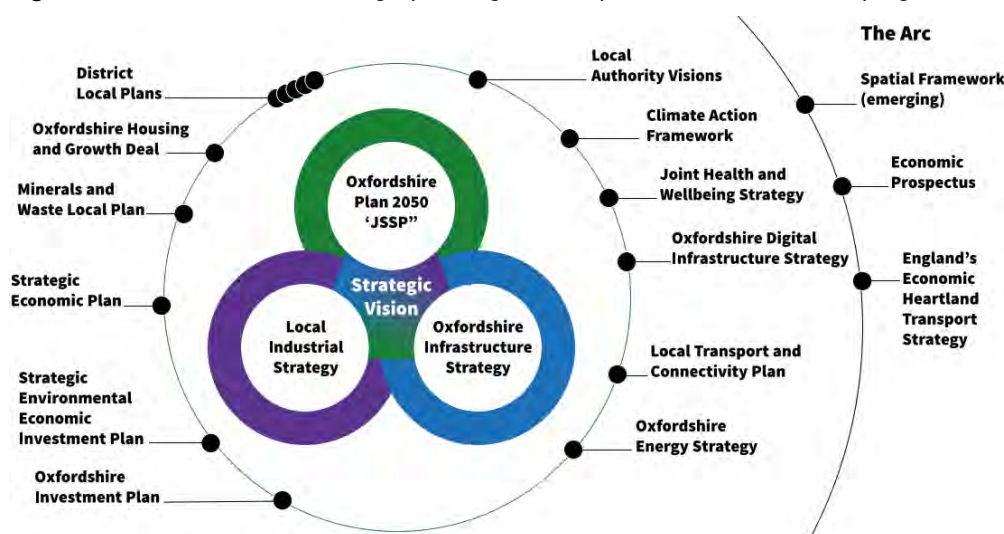


### The Oxfordshire Plan

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

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

**Figure 5.9:** The Oxfordshire strategic planning context, prior to a decision not to progress the JSSP



5.2.88 The following stages of work to explore Oxfordshire-wide spatial strategy options also remain of note:

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

5.2.89 Focusing on the Oxfordshire Local Plan work completed in 2021, implications for Cherwell LPR reasonable growth scenarios (albeit with limited weight / importance) include:

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

## Overarching aims of the local plan review

- 5.2.90 Set out below is a discussion of broad distribution issues / opportunities in respect of the three Cherwell LPR 'overarching themes' in turn. This discussion is also mostly unchanged since the 2023 ISA Report.

### *Maintaining and developing a sustainable local economy*

- 5.2.91 Strategic housing growth directed to existing settlements could be supportive of economic objectives, mindful of notably different 'offers' (e.g. knowledge and creative sectors at Kidlington and Upper Heyford; automotive sectors and traditional industry at Banbury) and established objectives (e.g. the need to diversify the employment offer at Bicester, away from a dominance of warehousing). There is also a need to be mindful of the implications of housing growth-related traffic generation for economic objectives.
- 5.2.92 There are arguments for housing growth in support of economic objectives at all four top tier settlements, although perhaps less so Banbury. The town is home to the greatest number of jobs, but there is perhaps less case for housing growth from a perspective of supporting growth and change in respect of the local employment land offer. A key opportunity for Banbury is in respect of town centre regeneration, which is a matter with relatively limited bearing on the reasonable growth scenarios at the current time.

### *Meeting the challenge of climate change and ensuring sustainable development*

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

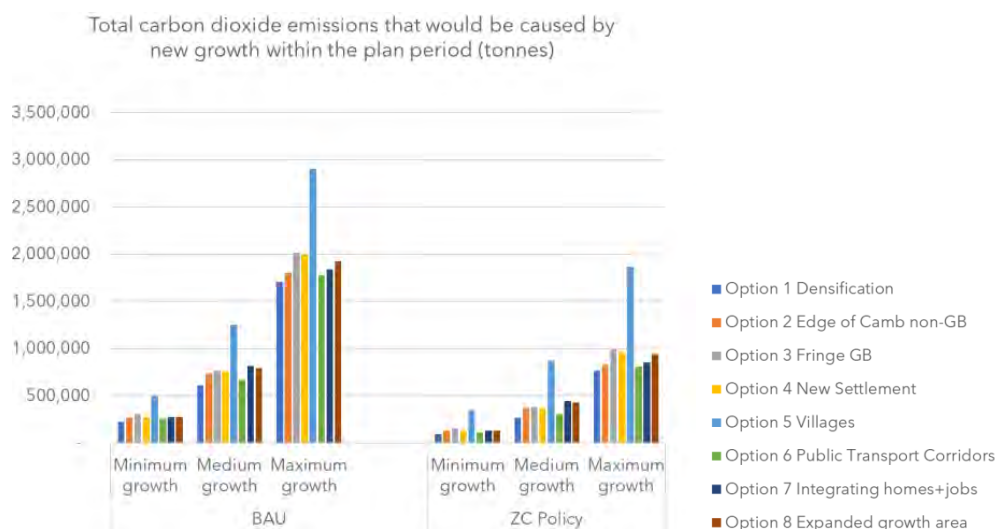
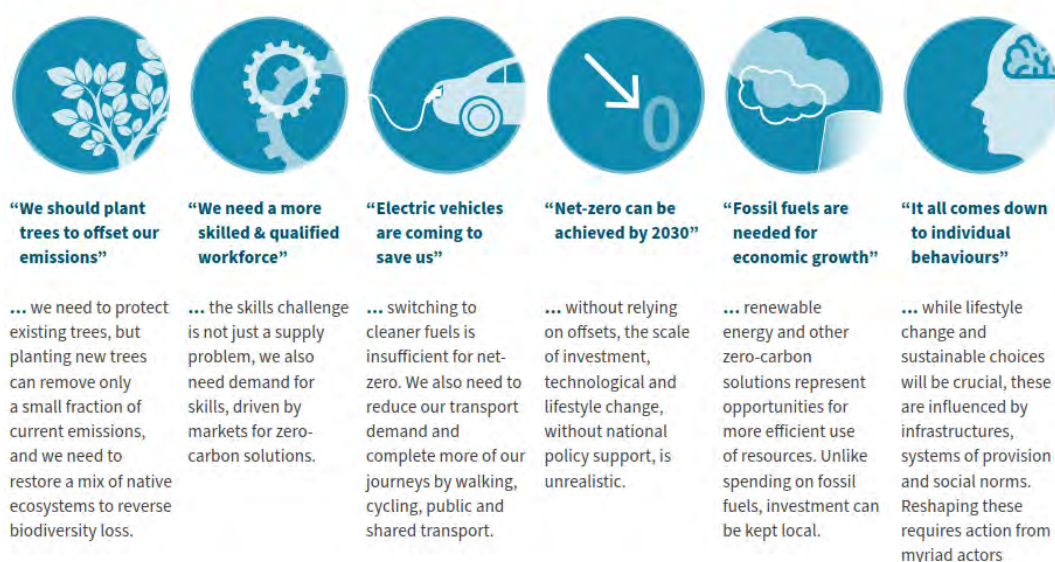
- **Transport** – broad distribution issues and opportunities are relatively well understood, with a need to direct growth to the most accessible and well-connected locations, support investment in sustainable transport corridors / strategic transport infrastructure and recognise that growth at scale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

Directing growth to rural villages is generally not supported from a transport decarbonisation perspective. For example, work to appraise 48 scenarios for the Greater Cambridge Local Plan served to highlight a spatial strategy of supporting growth at villages as performing very poorly – see Option 5 in Figure 5.10.

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

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

- 5.2.95 The necessary level of ambition is evident from Cherwell's ambition to achieve district-wide **net zero by 2030**. This may well not be achievable (Figure 5.11), but the target serves to indicate a level of ambition.

**Figure 5.10: Emissions scenarios to inform the Greater Cambridge Plan (Etude & Bioregional, 2021)****Figure 5.11: An infographic from the Pathways to Net Zero report (2021)****Shattering myths****Building healthy and sustainable communities**

5.2.96 Key considerations relate to:

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

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

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

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

- **Traffic congestion** – is an issue perhaps most notably at Banbury, where the great majority of traffic enters and leaves the town via the A422 Hennef Way, leading to implications for functioning of junctions along the road, including Junction 11 of the M40. The Air Quality Management Area (AQMA) along Hennef Way is understood to be associated with some of the worst levels of pollution in Oxfordshire.
- **Place-making** – many lessons on good place-making have been learned over recent years locally, perhaps most notably through planning for strategic growth at Bicester, in line with its status as a national Garden Town and Healthy New Town, and at Heyford Park as a new settlement. It is also clearly the case that place-making objectives lend support to town centre regeneration, with the Options consultation document (2021) including a particular focus on Banbury Canalside, and the subsequent Town Centres and Retail Study (2021) identifying a series of wider opportunities.

### Concluding discussion

5.2.97 The Interim SA Report (2023) reached the following conclusions in respect of broad strategy:

- “There is a strong argument for *broadly* rolling forward the existing strategy, particularly the strategy of directing a high proportion of growth **Bicester** and **Banbury**, and to Bicester in particular.
- There are strategic arguments in support of growth in the **Kidlington** sub-area and at **Heyford Park**; however, it is difficult to reach a broad conclusion on scale at this stage in the process (see Section 5.4).
- There are limited strategic arguments in support of a **new settlement** (beyond that already planned at Heyford Park). However, the option cannot be ruled out at this stage in the process.
- There are limited strategic arguments for dispersing growth to the **rural area**, although consideration might be given to a limited boost to the rate of growth, in so far as sustainability considerations allow.
- In light of the recent Cherwell experiences, and also mindful of the Oxfordshire context (e.g. support for ‘living labs’ and decarbonisation ambition) there is support for **strategic growth locations**. However, there is a need to carefully consider place-making objectives (e.g. avoiding ‘sprawl’), and there are also clear arguments for **a mix of sites**, in terms of geographical spread and size / type.
- There are myriad **other strategic factors** that must feed-in to work to establish reasonable growth scenarios, e.g. maximising urban supply, avoiding environmental constraints / realising environmental opportunities, climate change adaptation and Green Belt protection. These factors all feed-in below.
- The discussion in this section has focused on broad distribution issues / options in respect of housing growth, but there are also significant considerations in respect of **employment land** – see Box 5.[3].”

5.2.98 Matters have evolved, but only to a limited extent, and it should be noted that broad spatial strategy was not a main focus of consultation responses received from organisations with a strategic remit in 2023 (see discussion in the current Consultation Statement). The County Council made a number of relevant comments, but these tend to focus on settlement-specific strategy (see discussion in Section 5.4).

#### **Box 5.3: Employment land broad strategy [discussion mostly unchanged from 2023]**

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

- Bicester – there is a need to balance high demand for warehousing/distribution with strategic objectives around boosting the offer of higher value employment aligned with the Oxfordshire Knowledge Spine.
- Kidlington – there is certainly a growth opportunity, particularly in the Research and Design (R&D) sector, given a relatively central location in the Oxford Knowledge Spine; however, the Green Belt is a constraint.
- Heyford Park – there is a need to support enhanced efforts to invest in the sensitive refurbishment and repurposing of existing buildings within the conservation area. There is also a need to be mindful of nearby M40 Junction 10, where there are currently large-scale speculative employment applications.
- Banbury – perhaps the primary opportunity is in respect of making best use of brownfield land within the urban area; however, land is also being promoted for significant employment growth to the east of the M40.
- Rural area – engagement with the local businesses... has served to highlight the importance of smaller employment sites... with a view to supporting [smaller businesses] to grow and relocate if necessary...



## 5.3 Site options

- 5.3.1 This section considers the individual site options that are the building blocks for growth scenarios. Specifically, the aim is simply to signpost to the Council's Housing and Economic Land Availability Assessment (**HELAA**), which amounts to a shortlisting process.
- 5.3.2 Specifically, the HELAA considers 538 site options and for each one reaches a conclusion on whether the site is 'deliverable' (able to deliver within 5 years) or 'developable' (able to deliver within the plan period), in terms of both housing and employment land, after determined the site is both:
- Available and achievable – meaning there is a reasonable prospect of a planning application being made, accounting for development viability at the location in question (i.e. the potential to make a reasonable profit) and assuming that the site will be delivered in a way that accords with the typical policy asks made of developers, e.g. delivering affordable housing and biodiversity net gain. This is not always clear cut, particularly where the land is currently in a profitable use and recognising the costs and risks involved with seeking planning permission, even where a site is allocated in a plan.
  - Suitable – the aim is to reach a high level conclusion in light of a basic set of standard criteria. There is a clear recognition that not all sites deemed to be suitable through a HELAA will be deemed suitable for allocation through the local plan, in light of: A) more detailed analysis of the site (i.e. qualitative analysis drawing upon professional planning judgement that cannot reasonably be applied to all 538 HELAA sites in a way that ensures a level playing field); and B) consideration of the site in combination with others (recognising the potential for in-combination effects at a range of scales, e.g. at the settlement scale).
- 5.3.3 The HELAA identifies 121 sites that are non-committed (i.e. without either planning permission or an existing allocation) and deliverable/developable for housing, and 51 for employment.
- 5.3.4 Focusing on housing, the total capacity of these sites is 22,788 homes, which is more than twice as many homes than need to be provided for through LPR allocations under any reasonably foreseeable scenario.<sup>10</sup>
- 5.3.5 As such, it is reasonable to focus on HELAA-supported sites as **a shortlist** in Section 5.4.
- 5.3.6 However, there is the possibility of HELAA-rejected sites needing to be brought back into contention for allocation in light of strategic factors (again, accounting for factors at a range of scales, e.g. a HELAA-rejected site might deliver in combination with a HELAA-supported site to deliver or facilitate delivery of an infrastructure upgrade, or otherwise it might generally be the case that there is insufficient capacity from HELAA-supported sites at a settlement to deliver on local needs and wider objectives).
- 5.3.7 Finally, it should be noted that the discussion above is a notable evolution from that presented within Section 5.3 of the Interim SA Report (2023), at which time the focus was strictly on larger sites able to deliver a scheme of at least 3 ha (e.g. ~120 homes). These were known as **LPR sites** and Section 5.3 introduced a total of 63 LPR sites that formed the building blocks for work to define growth scenarios at that stage, with a second criteria being the need to relate reasonably well to a higher order settlement.
- 5.3.8 Subsequent detailed work through the HELAA means that it is 'HELAA-supported' sites that now provide the primary bottom-up starting point for work to define growth scenarios, but it also remains the case that it is reasonable to focus a degree of attention on larger / strategic site options (see Section 5.2). As such, Section 5.4 includes a focus on previous LPR sites that are now HELAA rejected.

<sup>10</sup> As discussed in Section 5.2, a reasonable high growth scenario might see the housing requirement set at a figure in the region of 28,000 (at most) such that supply might need to be at most ~33,000 homes (such that there is a healthy 'supply buffer' over-and-above the housing requirement), whilst 'existing supply' from completions, commitments and windfall is ~22,800 homes (as discussed in Section 2). The difference between these two figures is almost 10,000 homes (33,000 – 22,800), hence the capacity of non-committed HELAA deliverable/developable sites (22,778 homes) is more than twice the number of homes feasibly needed.

## 5.4 Sub-area scenarios

### Introduction

- 5.4.1 Discussion has so far focused on A) 'top down' consideration of strategic factors (growth quantum and broad spatial strategy); and B) 'bottom-up' consideration of site options. The next step is to consider each of the District's sub-areas in turn, exploring how sites might be allocated in combination.
- 5.4.2 A key aim is to ensure vision-led planning, recognising that sub-areas will typically be the scale at which key stakeholders identify strategic issues and opportunities to be addressed/realised through the LPR.

#### What sub-areas?

- 5.4.3 Section 5.2 has already introduced the following five sub-areas:
- Banbury;
  - Bicester
  - Kidlington;
  - Heyford Park; and
  - the rural area.
- 5.4.4 It is recognised that the sub-areas must be defined loosely, particularly in respect of villages linked closely to a higher order settlement. Also, it is recognised that village clusters are an important consideration.

#### Methodology

- 5.4.5 The aim is to draw together the 'top down' and 'bottom up' inputs discussed above before concluding on 'sub-area scenarios' to take forward to Section 5.5, where the aim is to combine sub-area scenarios to form district-wide RA growth scenarios for formal appraisal and consultation.
- 5.4.6 The shortlist of deliverable/developable **HELAA sites** is a key bottom-up starting point, along with strategic site options previously discussed in 2023 (at the Draft Plan / Interim SA Report stage) as **LPR sites**.
- 5.4.7 Consideration is then also given to 'top down' considerations including alignment with the settlement hierarchy, infrastructure issues and opportunities and the case for a degree of focus on strategic sites.

#### Further note on methodology

- 5.4.8 The aim here is not to present a formal appraisal, but rather to contribute to "an outline of the reasons for selection" the reasonable alternative growth scenarios ultimately defined in Section 5.5, below. Accordingly, the discussions are systematic only up to a point, with extensive application of discretion and planning judgment. The aim is not to discuss all site options to the same level of detail, but rather to focus attention on those *judged to be more marginal*, i.e. where the question of whether or how to take the option forward is more finely balanced. In turn, those site options low down the order of preference can naturally be discussed relatively briefly where it is the case that better performing sites would together deliver a reasonable high growth scenario defined taking account of: A) the number of homes needed from LPR allocations district-wide; B) the case for distributing total growth over the plan period (accounting for completions, commitments and LPR allocations) broadly in line with the settlement hierarchy; and C) whether a high growth strategy would deliver particular benefits, e.g. a strategic infrastructure upgrade.
- 5.4.9 In respect of (A), it is important to reiterate that completions and commitments will deliver 21,402 homes over the plan period (plus 1,400 homes can be assumed from windfall, and a further 4,300 homes permitted at North West Bicester are expected to deliver post 2042), which is a figure in excess of the 20,029 homes figure discussed in Section 5.2 as a key 'target' for the LPR comprising LHN plus an additional need to provide for 4,400 homes unmet need from Oxford. In this light, there is the theoretical possibility of not allocating through the LPR. However, in practice there is a strong argument to suggest that this scenario is unreasonable, for reasons including: 1) there is a need for a 'supply buffer' to ensure a robust housing land supply trajectory over the course of the plan period, i.e. a situation whereby the housing requirement can be delivered year-on-year (to avoid the presumption in favour of sustainable development); 2) there are site and settlement-specific arguments for supporting growth that go beyond meeting housing need; and 3) there are arguments for setting the housing requirement at a higher figure.



## Banbury

- 5.4.10 As per the discussion in Section 5.2, Banbury is associated with *relatively* limited growth opportunity, in comparison to Bicester, and there are significant constraints to growth. However, there is nonetheless a clear need to direct a good proportion of growth to Banbury, as the District's largest town. Also, sites at Banbury are delivering well at the current time and this is expected to continue across the early years post adoption of the LPR, which is contrast to Bicester and Kidlington, as discussed. This is an important consideration from a perspective of ensuring a five year housing land supply at plan adoption.<sup>11</sup>
- 5.4.11 With regards to spatial strategy, an important starting point is the linked topics of topography, landscape, built form and historic character. The valued historic core is associated with the River Cherwell valley and the associated Oxford Canal corridor. From here, directions / potential directions of growth as follows:
- **West** (including NW/SW) – this is the primary direction of 20<sup>th</sup> and early 21<sup>st</sup> century residential expansion. There is a case for containing the town within the Cherwell valley, avoiding the town's built form 'spilling' into the valley of the Sor Brook, including noting changes to geology / landscape character and much historic environment sensitivity including Wroxham Abbey Grade II\* Registered Park/Garden.
  - **East** – the Grimsbury residential neighbourhood was an early area of expansion, in the late 19<sup>th</sup> century and early 20<sup>th</sup> century. This was then followed by the M40 in the second half of the 20<sup>th</sup> Century, and it is now the case that industrial areas have expanded as far as the motorway ('Banbury Industrial Zone'). There is a strong argument for drawing upon the motorway for the purposes of containment, also mindful of the District's boundary with West Northamptonshire. However, on the other hand, there are certain arguments for (further) employment land east of the motorway, given the importance of road connectivity.
  - **North** – the key defining feature is the River Cherwell / Oxford Canal / Railway corridor and associated valley topography. To the east, a series of industrial areas came forward in the late 20<sup>th</sup> Century, followed by a residential neighbourhood following a local plan allocation (separated from the town by the industrial area, but well contained by the M40 and A423). To the west, a series of new residential neighbourhoods were delivered in the early years of the 2000s, contained to the south of a new road (Dukes Drive). One further neighbourhood has then come forward over recent years to the north of Dukes Drive, and three further sites have planning permission, including one that would extend the recently delivered site.
  - **South** – this area has been a focus of recent growth, plus there is extensive committed growth. Again, a key defining feature is the river / transport corridor, plus there is the village of **Bodicote** on raised ground to the west of the river corridor. Bodicote has expanded significantly beyond its historic core and has seen significant expansion to the east and south over recent years. There is a permitted site for 46 homes to the north and a pending planning application for 820 homes to the east ([19/01047/OUT](#)), plus committed and further potential growth locations at the southern edge of Banbury are nearby.
  - **Adderbury** – is located some way to the south of Banbury, although there is relatively good bus connectivity, with the Transport Assessment (2022) identifying the A4260 as the highest quality road corridor in the Banbury area. There is also a need to consider road traffic, given that the village is near equidistant between M40 junctions. Adderbury is a historic village associated with the Sor Brook, and also the former railway line to Chipping Norton. There is an extensive conservation area with a large number of listed buildings (it was historically a much larger village than Bodicote), with the village having expanded to the north in the 20<sup>th</sup> Century (Twyford), before more recent expansion to the southwest (219 homes have been completed since 2020, and a further 44 are committed). There are a number of sizeable HELAA sites, such that strategic growth is feasibly an option, particularly at Twyford. However, this option can be ruled out given a lack of clear growth-related opportunities and sequentially preferable locations for growth district-wide (including at villages more closely linked to a higher order settlement).
- 5.4.12 Finally, there is a need to note **town centre** regeneration opportunities (over-and-above Bicester). Canalside is a key site adjacent to the town centre, which is an option for allocation. However, there are several other town centre opportunity sites as discussed within the Town Centre and Retail Study (2021), which concludes a need for a town centre masterplan to “*ensure a comprehensive strategy and delivery.*”

<sup>11</sup> It is understood that grid capacity is less of a constraint to growth a Banbury relative to Bicester. However, there is some uncertainty, with the current Infrastructure Delivery Plan (IDP) explaining: “*The NGET substation at East Claydon is constrained by its current infrastructure and this limits the potential to supply significant levels of new development. NGET are undertaking a project to upgrade this substation and this is expected to be complete by 2031. All Banbury and Bicester sites are supplied from East Claydon NGET substation. Despite these capacity constraints, early phases of development should be able to come forward before this date, as some capacity is understood to be available.*”

- 5.4.13 A starting point is the **urban area**, where the latest proposal is to take forward two existing housing-focused allocations with amendments, namely Canalside (700 homes plus 7.5 ha employment) and Bolton Road (200 homes), plus Calthorpe Street is a new proposed allocation for 170 homes.
- 5.4.14 Focusing on Canalside, this is a challenging site on account of flood risk, and the ISA Report (2023) discussed the possibility of a reduced housing capacity, but there is now confidence in the 700 home capacity figure, albeit this will be subject to further work, such that there is an element of delivery risk. There has previously been consideration of some retail, which might have assisted with minimising flood risk concerns, but this could detract from town centre (consolidation) objectives, such that the proposal now is for residential development to the west of the River Cherwell and employment to the east, along with a new linear park along the length of the river within the site.
- 5.4.15 With regards to Bolton Road, the 2015 Local Plan allocated this site for retail and other town centre uses and residential, but the view now is that town centre uses would not be appropriate and so the new proposal is for a residential-led mixed use development. Calthorpe Street is then a new allocation that associated with relatively few issues and development might benefit the town centre conservation area. There is a current planning application ([23/01633/F](#)) such that there are good delivery credentials. Finally, within the urban area, Higham Way is now proposed for 3ha of employment. The ISA Report (2023) had explained: *“[The site] is allocated for 150 homes in the adopted local plan, and the working assumption is that the existing allocation will be rolled forward. However, there may well be a need to reconsider this, including considering... an employment only scheme, including due to flood risk.”*
- 5.4.16 There are no other clear options for allocation in the urban area, recognising that sites can come forward as windfall and there is a proposed windfall assumption (and a need to avoid double counting supply).
- 5.4.17 With regards to greenfield options, a first port of call is **HELAA026** (East of Bloxham Road; South of Salt Way East - Phase 2; also known as North of Wykham Lane; 600 homes). This was a proposed allocation in 2023 and featured as a constant across the RA growth scenarios at that time, and then it generated relatively limited concern through the consultation. Section 5.4 within the ISA Report presented a detailed discussion of issues etc, but that discussion need not be repeated here at the current time. Overall the clear conclusion is that this is the most strongly performing greenfield housing allocation option at Banbury.
- 5.4.18 There are then three further HELAA-supported non-committed greenfield sites, of which two are located to the north of Banbury. Both of are smaller sites that would deliver little beyond new housing.
- 5.4.19 Firstly, at the northwest extent of Banbury is **HELAA386** (Land North of Drayton Lodge Farm; 186 homes), which is a fairly unconstrained, but would risk development sprawl along the B4100 Warwick Road, noting: a recently delivered site to the southeast (Site 5 in Figure 5.13, below); an existing permitted site for 320 homes to the south (following a Local Plan allocation for 250 homes; Site 18 in Figure 5.13); and a site to the east that recently gained permission at appeal (discussed as site LPR48 in the ISA Report, 2023). The road corridor is supported by the Transport Assessment (2022), but it is obviously the case that links to Oxford and Bicester are relatively poor, and the town centre is distant. The road is associated with a linear plateau, with the land falling away to valleys to the west (Sor Brook) and east (Hanwell Brook), but there is potentially space for further expansion on the plateau. The Landscape Study assigns ‘low-moderate’ sensitivity in respect of land to the east (the site that recently gained permission at appeal) but ‘moderate’ sensitivity in respect of land to the west (the potential allocation option currently in question).
- 5.4.20 Secondly, **HELAA036** (Land off Dukes Meadow Drive, Banbury) is a complex site, but the first point to note is that the southern part of the site (a discrete field) was recently permitted for 78 homes at appeal, and the second point to note is that an EIA screening/scoping has previously been undertaken for 400 homes across the site as a whole. Focusing on the northeast part of the site (adjacent to the permitted 78 homes scheme): an application for a 176 homes was submitted and then withdrawn; an application for 114 homes was recently refused ([23/03366/OUT](#)); and now an application for 114 homes is pending ([24/02514/OUT](#)). Figure 5.12 shows the site as a whole, and within it both the permitted site for 76 homes and the site currently the subject of a pending application. Figure 5.12 also highlights sloping topography, which leads to a degree of landscape sensitivity, in that from Dukes Meadow drive looking east there are views down towards and across the Hanwell Brook valley. Also, there is a concern regarding further development creep / piecemeal sprawl to the north of Dukes Meadow Drive, both within the HELAA site and more widely (noting a site to the west that recently gained permission at appeal, as discussed above).
- 5.4.21 This site was discussed in the ISA Report (2023) as LPR62, and was overall judged to perform relatively poorly, with the report explaining:

“...the Landscape Sensitivity Assessment (2022) considers a large parcel of land (BAN14) stretching from land south of Hanwell in the west to the Hanwell Brook in the east. The land slopes significantly from west to east (towards the brook), such that there are long distance views. For this reason, and due to the nearby Hanwell Conservation Area, the study assigns an overall ‘medium-high’ sensitivity rating, such that it can be considered relatively sensitive in landscape terms. There is little reason to suggest this sensitivity score would not apply to LPR62, which comprises more than 1/3 of BAN14, plus land here is equidistant between strategic road corridors. A primary school is near adjacent, but there is a clear argument for avoiding expansion north of Dukes Meadow Drive...”

**Figure 5.12: North of Dukes Meadow Drive**



5.4.22 A final consideration in respect of both HELAA-supported sites to the north of Banbury is agricultural land quality, with all land in this area having been surveyed in detail, and found to comprise a mixture of grade 2, grade 3a and grade 3b quality land. Both of the HELAA sites include significant grade 2 quality land.

5.4.23 The next port of call is then land to the west of Banbury, along the B4035 Broughton Road. This sector of land was considered closely within the ISA Report (2023), with a joint discussion of land to the north of the road (referred to at the time as LPR50) and land to the south of the road (LPR51):

*“The next sites to consider are LPR50 and LPR51, which are located either side of the B4035. Landscape is again a key consideration here, with the Landscape Study assigning ‘moderate-high’ sensitivity, reflecting the fact that the B4035 is associated with a shallow valley, with land rising to the north (LPR50) and south (LPR51). The very northern extent of LPR50 is now a committed site for 49 homes, but this is not thought likely to have a significant bearing on the landscape sensitivity of LPR50 overall. On the one hand, land here benefits from good access onto the B4035; however, on the other hand: the road serves a rural area, and so is unlikely to be served by a frequent bus service; there is no cycle path along the road; and there are potentially sensitive views from the road (subject to hedgerow height and leaf cover) to rising land on the approach to / upon leaving Banbury. There are also potentially sensitive views across this land to / from Crouch Hill (located just to the south), from the Banbury Fringe Walk and/or from Saltway Farm Shop. Overall, this is considered a sensitive rural gateway to Banbury. However, on the other hand, it is noted that land here has been surveyed in detail and found to comprise grade 3b quality agricultural land, such that it is not classed as best and most versatile, in contrast to sites discussed above. On balance, these two sites are judged to perform relatively poorly, but this is quite finely balanced in the case of LPR50, which could potentially have relatively limited landscape sensitivity (also, it is noted that the surface water flood zone along the valley affects LPR51 more so than LPR50). The possibility of a joint scheme involving LPR50 and LPR49 (adjacent to the north), could feasibly be considered, with a view to securing improved road access to LPR49, but this has not been proposed by the site promoters.”*

5.4.24 The ISA Report ultimately favoured LPR50, to the north of the road (para 5.4.21 of the report), and the current situation is that the HELAA concludes that the eastern-most site within LPR50 is developable, namely **HELAA469**. Specifically, the HELAA explains that whilst the northern part of this site has permission for 49 homes (under construction), the southern part (linked to the B4035) also has capacity.

- 5.4.25 An issue though is that development within the southern part of HELAA469 (adjacent to the north of the road) would then likely lead to pressure for development south of the road, with a view to a suitably rounded urban edge, plus there would then be pressure for further expansion to the west within the remaining four HELAA sites that make up LPR50 and LPR51 as explored at the Draft Plan / ISA Report stage. The site that would be the first port of call to the south of the road (on account of linking to the urban edge) is **HELA034**, but the HELAA concludes: *“The site is considered to be unsuitable for development. The site includes Crouch Hill within its southern limit. Development in this location would cause adverse landscape and visual amenity impacts. The site has existing access off Broughton Road. Due to the existence of Crouch Hill in the south of the site, the site slopes up from Broughton Road.”*
- 5.4.26 Overall, there is a clear case for comprehensive planning within this sector of the Banbury urban edge, avoiding sub-optimal piecemeal growth with opportunities missed including infrastructure-related. As well as the permitted site for 49 homes within HELAA469 there is also a permitted strategic urban extension located very nearby to the north, comprising a previous Local Plan allocation (Site 3 in Figure 5.13) and a southern extension granted permission in 2024 (previously an allocation in the Draft Local Plan, 2023).<sup>12</sup> Furthermore, there are other nearby sites permitted, under construction or recently having delivered (including Site 16 in Figure 5.13). To reiterate, this is an important gateway into the town, with landscape sensitivities relating to the Sor Valley, Crouch Hill and a general change in character linked to geology.
- 5.4.27 Other options for the expansion of Banbury were judged to perform less well at the Regulation 18 stage (2023), and that remains the case at the current time.
- 5.4.28 In the northeast sector, **HELA038** was discussed in 2023 as LPR60, and would extend permitted site HELAA042, but the ISA Report was not supportive of this option, explaining the situation as follows:
- “LPR60 – would involve a northwards extension of the aforementioned committed site for 90 homes, located to the east of the Hanwell Brook and to the west of the A423. The Landscape Study assigns overall ‘moderate’ sensitivity to land in this area (BAN15) but is clear that sensitivity is lowest adjacent to the Banbury settlement boundary, i.e. where there is already a committed site for 90 homes. Land within the site rises to the northeast, towards an adjacent crematorium, and drops away to the west, towards the Hanwell Brook, such that there is considered to be a landscape constraint...*
- ... The site benefits from direct access onto the A423, as well proximity to employment and community infrastructure delivered over recent years alongside housing growth (although this part of Banbury is distant from a secondary school). However, the Transport Assessment (2022) does not identify this as one of the higher quality A-road corridors at Banbury. On the other hand, it states: “... A423 Southam Road... there is scope for this route to be enhanced for walking and cycling in particular, with width available within or close to the highway expansion. Key challenges are the industrial nature of the road towards the town centre, and the rural edge towards Hanwell View.”*
- 5.4.29 At the current time, the HELAA concludes the following for HELAA038:
- Part of the Hardwick Farm, Southam Road strategic allocation (Banbury 2) of the adopted Local Plan Part 1 lies to the south of the site which allocates land for 90 dwellings. This has already received planning permission. The site is considered to be unsuitable for additional development... A previous planning application (14/00825/OUT) for the development of up to 230 homes, local retail and community facilities on this site and land to the south was dismissed at appeal stage due to the effect of the proposal on the character and appearance of the surrounding area and the setting of Banbury. These principles have not changed since the application was dismissed, therefore the site is unsuitable.*
- 5.4.30 Overall, there is considered to be a case for long-term comprehensive planning in respect of the entire northern sector of the Banbury urban edge, stretching from the B4100 corridor in the west to the A423 corridor in the east, taking in the Hanwell Brook valley, respecting the value/sensitivity of Hanwell and ensuring that opportunities for infrastructure delivery are fully realised (including community, transport and green/blue infrastructure). This opportunity was flagged in the ISA Report (2023), which discussed:
- “...targeted investment in the Hanwell Brook corridor, along which there is currently no priority habitat, nor any public access (other than Hanwell Brook Wetland, adjacent to the Banbury settlement edge). Also, the possibility of improved flood storage to benefit the extensive urban areas at risk of flooding downstream could be explored (although this is not considered to be a realistic option to explore at the current time).”*

<sup>12</sup> This site was discussed in Section 5.4 of the ISA Report as LPR49.

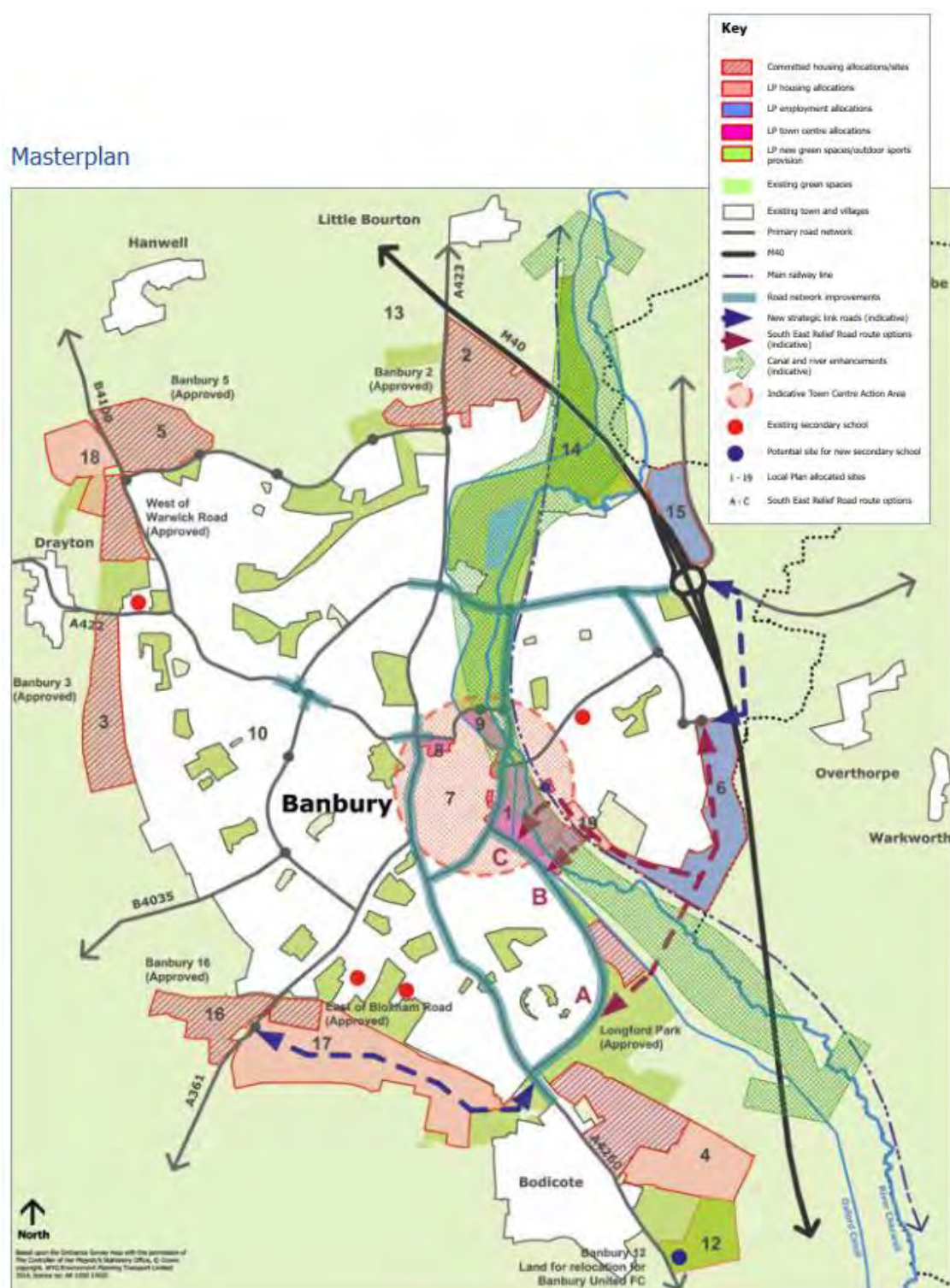
### Conclusion on sub-area scenarios

- 5.4.31 Completions and commitments at Banbury will deliver 5,707 homes (including Canalside and Bolton Road at the capacity figures discussed above, with both sites warranting an allocation at the current time), plus 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.
- 5.4.32 However, East of Bloxham Road (South of Saltway 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 subsequently been made to the site boundary. 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 to the north is now under construction and, in turn, a benefit supporting 'Phase 2' is that the site has very strong delivery credentials; indeed, it is expected to deliver 200 homes in the crucially important first five years of the plan period (in the context of the plan needing to including a five year housing land supply at the point of adoption, and in the context of constraints to early delivery at both Bicester and Kidlington, as discussed).
- 5.4.33 In this light, reasonable **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, and it should be noted that both allocations are a focus of the appraisal presented in Part 2 of this report).
- 5.4.34 With regards to higher growth, there is limited strategic case to be made, and another consideration is that all three of the larger villages closely linked to Banbury are suited to a significant housing requirement (with allocations then made through a subsequent neighbourhood plan), as discussed further below.
- 5.4.35 It is recognised that there is the option of allocating North of Dukes Meadow Drive, in order to deliver an additional ~114 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. On balance, it is considered appropriate for the current planning application to take its course, rather than exploring the option further here through appraisal of / consultation on reasonable growth scenarios.
- 5.4.36 It is then difficult to identify other options for delivering significant expansion of Banbury, with the next port of call potentially land in the vicinity of Broughton Road, to the west of the town, but this is not one of the higher quality road corridors, and there are landscape sensitivities, plus again concerns regarding problematic piecemeal growth with opportunities missed to deliver infrastructure / planning gain.
- 5.4.37 Overall, it is considered very important to plan comprehensively for the expansion of Banbury with a strategic and long-term perspective, e.g. noting how the situation has moved on since the Banbury Vision was adopted in 2016 – see Figure 5.13. Historic mapping can be viewed to gain an appreciation of the expansion of Banbury over the past ~120 years, and whilst the scale of expansion is not necessarily unusual, the characteristics of Banbury serve to highlight the need to caution against development sprawl.
- 5.4.38 A further consideration is the possibility of a southeast relief road (see Figure 5.13) to ease the current situation whereby a high proportion of traffic enters and exists the town via the problematic A422 Hennef Way. However, it is not clear that this remains a realistic possibility at the current time. N.B. Figure 5.13 also clearly shows the committed new link road between the A361 and A4260 corridors.
- 5.4.39 As such, and in conclusion, **one sub-area scenario** is taken forward to Section 5.5 – see Table 5.1.
- 5.4.40 This is in respect of housing growth, but employment growth is a further consideration. There is only one significant allocation option, which is to support further growth to the east of the M40, but there are constraints and issues that are a barrier to growth here. It is far from clear that there is a strategic case for growth that outweighs these issues, but the matter is discussed further in Section 5.5.



**Table 5.1:** One reasonable housing growth scenario for the Banbury sub-area

	Number of homes	
	Scenario 1	Scenario 2
Completions and commitments	5,707	-
Calthorpe Street	170	-
East of Bloxham Road, Banbury (Phase 2)	600	-
<b>Total</b>	<b>6,477</b>	-

**Figure 5.13:** The Banbury Vision (2016)

## Bicester

- 5.4.41 As per the discussion in Section 5.2, there is a clear argument for rolling forward the existing strategy of directing a greater proportion of growth to Bicester than to Banbury (i.e. the adopted local plan strategy), given that Bicester is associated with fewer constraints and a clear strategic growth opportunity.
- 5.4.42 With regards to growth opportunity, key considerations include: a position at the northern extent of the Oxfordshire Knowledge Spine; a central position within the Oxford to Cambridge Arc, with a new rail link to Bletchley (Milton Keynes) opening in 2025; excellent connectivity to the M40 and also the A34 (a key route linking Southampton to the Midlands); good links to Aylesbury Garden Town via the A41 and also a good train service to London; a desire to support a shift away from a dominance of warehousing and logistics employment uses, to a more mixed portfolio of sites, to include support for more knowledge sector jobs; the recent success of Elmsbrook, as the first delivered phase of the committed NW Bicester strategic scheme, which has gained national attention as an exemplar low carbon development; and the emerging success of Graven Hill – which is currently building-out – as England's largest self-build housing scheme.
- 5.4.43 Bicester also has an established status as a Garden Town and a Healthy Town, which serves to highlight the potential for growth to bring with it benefits to the local community ('planning gain'). However, there is a concern regarding infrastructure capacity to support growth, perhaps most notably in respect of transport infrastructure, with an established need for a southern link road. There is a clear focus on transport upgrades aimed at reducing traffic and supporting modal shift to walking / cycling and public transport.
- 5.4.44 With regards to spatial strategy, a key point to note is that whilst landscape and associated environmental constraints to growth are overall considered to be relatively low (also agricultural land quality constraints), Bicester is far from a 'blank canvass' for further growth, and not only due to infrastructure capacity issues. Bicester has expanded in a largely concentric fashion from its central historic core (Bicester was a small market town until the latter 20<sup>th</sup> Century), but there are a range of broad spatial considerations:
- **Southwest** (north of the A41) – the sector of land between the A41 and the Middleton Stoney Road has been developed as a major new community (Kingsmere) over the past 15 years. An important new link road between the two radial road corridors was successfully delivered as part of an early phase, as well as significant new community infrastructure, and the road forms a natural western boundary to Bicester, serving to ensure that a landscape gap is maintained to the historic village of Chesterton (along with a new community woodland in line with adopted Local Plan Policy Bicester 7). However, options for further growth in this sector do require consideration, given good transport connectivity. The proposal at the Regulation 18 Draft Plan stage (2023) was to support a mix of housing and employment land, but there is now considered to be the option of a pure employment focus, as an employment 'gateway' to Bicester.
  - **Northwest** – this is the location of the committed NW Bicester Ecotown, which has faced delivery challenges, including relating to fragmented land ownership, and the challenge of delivering a realigned Northwest Bicester ring road (A4095, Howes Lane), although the first phase (Elmsbrook) has now been delivered, at the eastern extent of the wider site, and a number of other planning applications have been approved or are currently under consideration. The historic village of Bucknell (including a Grade I listed parish church) is found to the north and is a constraint to further expansion. However, on the other hand, expansion of Bicester as far as Bucknell (beyond which is slightly rising land associated with a modest density of small woodland patches) and the M40 is an option to consider. To the northwest is Ardley (including land that could potentially deliver a reopened train station), M40 J10 and Heyford Park.
  - **Northeast** – this sector is associated with Caversfield Parish, to the west of the A4421, and Bicester Airfield to the east. At the western extent of this area, directly to the east of NW Bicester Ecotown, is Caversfield House, which is not itself listed, but which is associated with landscaped grounds and a Grade II\* listed church, plus there is an associated historic farmstead. To the east is then an area known as Caversfield, comprising military housing originally built to serve RAF Bicester. The airfield itself, which remains in use as an aerodrome, and is the home of Bicester Heritage Business Park, is then to the east of the A4421. The entire airfield is a designated conservation area, and a key sensitivity is the cluster of 26 Grade II listed buildings at its southwest extent. As well as heritage and tourism constraint, land to the east of Bicester also has relatively poor transport connectivity.
  - **East** – to the southeast of the airfield is a new employment site and a stream associated with a wide flood plain. Beyond this is a sector of land that comes into consideration as a potential location for growth, although it is not very well linked in transport terms (given employment land at the eastern extent of Bicester). Also, there is a risk of eastwards sprawl across a flat and relatively featureless landscape.

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

- **Southeast** – this is the location of a major committed urban extension, which gained permission for 1,500 homes in 2018, with the employment land now having been delivered, adjacent to the A41. There is the possibility of further expansion, drawing upon the railway line to London and the A41 for containment, also mindful of Blackthorn Hill, which is a low hill in an otherwise very flat and low-lying landscape, and mindful of the sensitive landscape of the Upper Ray Meadows further to the southeast.

The A41 is a strategic transport corridor; however, there are challenges in respect of connectivity to/from the M40 and Oxford, given: the missing southern link road; nearby growth at Graven Hill; nearby Bicester village; and the B4100 (London Road) level crossing, particularly given forthcoming East-West Rail (there is currently a consultation ongoing, as discussed in a recent news article [here](#)).

- **South** – at the settlement edge is the A41 associated with Bicester Village, including the EWR station, recent and committed employment land and a stream corridor. There is no further growth opportunity in this area, given a large scheduled monument (Alchester Roman town) and then to the south is the new community at Graven Hill. Land between Graven Hill and the flood risk zone potentially comes into contention, whether for residential or employment land, but there is a need to consider the village of Ambrosdon, plus there are transport connectivity challenges, as per land to the southeast of Bicester.

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

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

- **Chesterton and Wendlebury** – are smaller / small villages located to the southwest of Bicester, either side of the A41. This area comes into consideration as a potential location for growth given good transport connectivity, with good potential to cycle to Bicester, very good bus connectivity and the potential for employment land close to M40 J9.

Growth here could also assist with delivering a southern link road, albeit this should not be overstated, as growth anywhere at Bicester might reasonably be required to contribute funding, given the scheme's strategic importance.

- **Weston-on-the-Green** – the option of strategic growth here has been promoted, potentially in the form of a new settlement, given that Weston-on-the-Green is a smaller village (without a primary school). However, this option performs poorly, particularly on transport grounds, and given alternative new settlement options (Islip and Shipton Quarry) that would, or could, support good access to a train station. Also, at Weston-on-the-Green it would be a challenge to secure landscape containment, given a flat and expansive landscape. Development creep northwards, towards an airfield associated with slightly raised ground, could be envisaged. A preferable strategy is to focus growth at, or closer to, Bicester.

5.4.45 There are no urban sites that warrant an allocation, and so a logical starting point is **NW Bicester**. This is a complex site, but the story over time is as follows:

- The site was identified by the Government as a potential Ecotown in 2009, before Cherwell District council published a [Masterplan](#) in 2014. The site was then allocated for 6,000 homes in the current Local Plan (2015) before a Supplementary Planning Document (SPD) was adopted in 2016.
- All of the employment land allocated has been delivered, but only a small proportion of the residential, namely Elmsbrook / Firethorn at the eastern extent of the site (see Figure 5.14). Specifically, Elmsbrook has delivered as an exemplar scheme of 393 homes, following an application in 2010, whilst the adjacent Firethorn site recently gained permission at appeal for 530 homes and is now under construction.
- Hawkwell Village is a major planning application for 3,100 homes adjacent to the west of Elmsbrook / Firethorn that was submitted in 2021 (21/04275/OUT) and is now approved subject to agreement of S106 contributions (clearly a major undertaking for a scheme of this size and complexity). As can be seen in Figure 5.15, the site extends north significantly beyond the boundary of the NW Bicester Ecotown allocation (an extra 45 ha); however, the proposal is to deliver green / open space in this area.

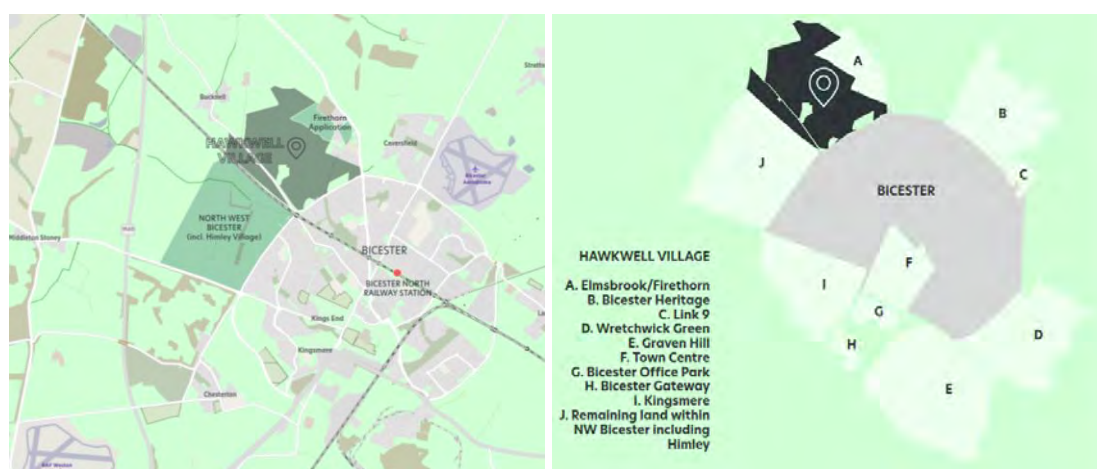
- In light of the Hawkwel Village application the Draft Local Plan (2023) extended the boundary of the site to include land to the north, namely LPR33 shown in Figure 5.16, and the plan also supported an additional 1,000 homes across the site as a whole (bringing the total number of homes to 7,000).<sup>13</sup>

This option was considered to perform strongly, and the latest proposal is to formalise the greenspace buffer by designating this land as one of several new proposed Strategic Gaps (to be shown on the LPR Policy Map and to be assigned a dedicated policy within the plan). However, the appraisal in 2023 did flag a need to consider the implications of increasing density within the built footprint of the site, and also explained: “... there is a need to revisit the adopted local plan allocation, given delivery challenges. There is also a need to be mindful of the work that has been undertaken through planning applications. However, equally, planning applications are subject to change, and LPR represents an opportunity to take a strategic, plan-led approach, mindful of lessons learned since the Masterplan... in 2014.

- It is now land to the west of the railway line that is the focus of attention, including land shown in the figures below as “remaining land within NW Bicester including Himley Village. The bulk of land here has been granted permission in the past (most notably 14/02121/OUT), but there are delivery challenges beyond the first 500 dwellings, including the challenge of delivering a realigned section of the Bicester ring road. Consideration was given to extending this western part of NW Bicester in 2023, but this option was not supported on balance, with the Interim SA Report explaining: “With regards to the option of allocating LPR34 for development, this would not necessarily serve to address the deliverability challenges with respect to the existing allocated site. The time for considering any expansion of the Ecotown would be once it is further along the path to delivery. A further consideration is adjacent Ardley Cutting SSSI, although this is potentially a green infrastructure opportunity as well as a constraint.”
- The proposal now is to further extend the site boundary including the area referred to in 2023 as LPR34 (see Figure 5.16). This is a large extension of ~100 ha, but the proposal is to designate around 1/3 of the extension as a Strategic Gap (specifically the northeast part of the extension area that comprises land to the southwest of Bucknell). The proposal is to increase the total number of homes delivered by the allocation by only a further 500 relative to the proposal in 2023 (which increased the capacity to 7,000), such that the effect could be to reduce density within the built footprint relative to 2023.

The latest extension option is considered to perform well, including as ongoing engagement and technical work serves to suggest that it will assist with delivery challenges. The existing site boundary in this area (west of the railway line) does not follow field boundaries, whilst the new proposed boundary would align strongly with field boundaries (indeed a single continuous hedgerow) along which there are two or three small woodland copses. The potential for land to the north to remain undeveloped in perpetuity can be envisaged, as this is slightly raised land (with views south to Bicester) associated with Middleton Road, which is a rural lane linking Bucknell to Middleton, along which there are historic farmsteads. It will clearly deliver green infrastructure and a valued rural setting to an expanded Bicester.

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



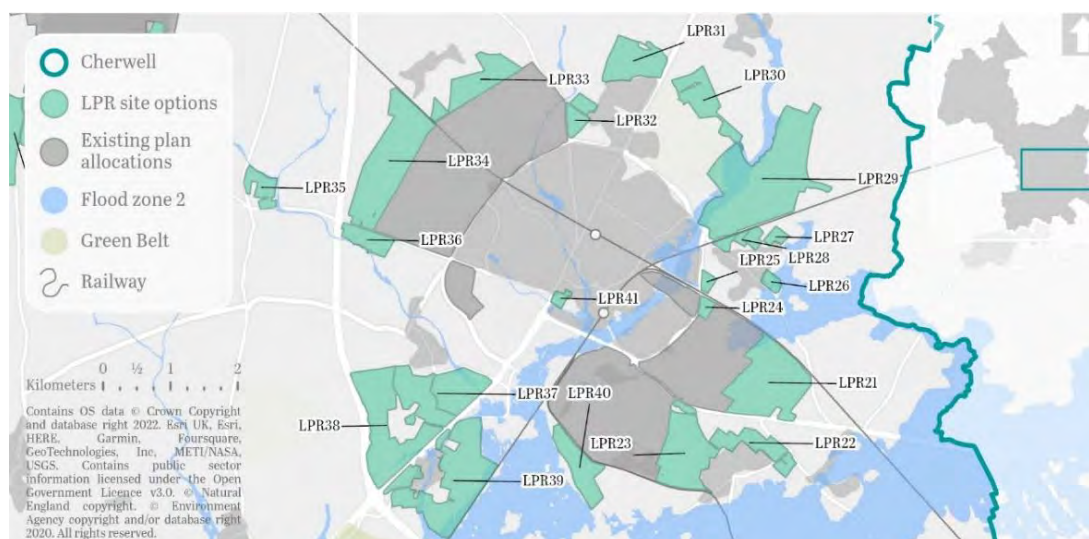
<sup>13</sup> The ISA Report explained: “One clear option for the LPR is to support an extended red line boundary (LPR33), as per the Hawkwel Village application, and to support an uplift in the number of homes across the Ecotown as a whole, taking account of detailed work completed through planning application processes and with a reasonable assumption made regarding the final sector of land (at the north west extent, either side of Langford Brook) where there is yet to be any planning application submitted. The built form would be higher density than previously envisaged, but there would be new strategic green / open space at the northern extent of the scheme / south of Bucknell, and the effect would be to support viability and ultimately deliverability.”



**Figure 5.15:** The promoter's concept masterplan for Hawkwell Village (from the current application)



**Figure 5.16:** A figure from the Interim SA Report (2023) showing strategic site options at Bicester



5.4.46 From the starting point of NW Bicester, it is then logical to consider site options in geographic order, moving in a clockwise direction around the settlement edge.

5.4.47 The first sites to consider, therefore, are adjacent sites **HELAA067** and **HELAA075**, which are located adjacent to the east of NW Bicester, and which were considered as LPR32 in 2023, at which time they were ruled-out including because “an issue is maintaining a landscape gap to / protecting the setting of historic Caversfield.” The HELAA (2024) does not support either site, explaining for HELAA075:

*“A planning application for the development of up to 200 residential units, access, amenity space and associated works including new village shop/hall was refused (13/01056/OUT) in October 2013 (also later dismissed at appeal) as, amongst other matters, the development would contribute significantly to coalescence between Bicester and Caversfield in an east-west direction. The Officer also noted that the area has a rural character... An outline application (24/00245/OUT) for demolition of existing structures and erection of up to 99 dwellings is currently under consultation, however the justification afforded to the earlier decision remains applicable. On this basis, the site is unsuitable for development.”*



- 5.4.48 Moving to the east, **HELAA379** and **HELAA576** would involve expansion of Caversfield, with the former a new submitted site in 2023, and the latter previously having been considered in 2023 as LPR31. The Interim SA Report (2023) stated: *“LPR31 is relatively unconstrained in a number of respects but is judged to perform relatively poorly in terms transport connectivity and links to Bicester / relationship with the existing settlement edge, mindful of distance to the town centre and limited community infrastructure offer at Caversfield, e.g. there is no primary school. There would also be a concern regarding north-eastwards development creep along a flat and relatively featureless landscape, although the potential for well-targeted woodland creation to bound the northeast extent of a development scheme can be envisaged.”*
- 5.4.49 Additional delivery of homes within the part of **HELAA576** (the newly submitted site) most closely related to Caversfield could potentially allow for a more logical strategic urban extension. However, the fact remains that there is little strategic argument for growth in this area, given transport objectives for Bicester and recognising the importance of supporting / not hindering the delivery of nearby NW Bicester.
- 5.4.50 Moving to the east is the sector of land east of Bicester between the A4421 and the railway line (EWR) including Bicester Airfield. The most significant site in this area is **HELAA529**, which was broadly considered as LPR29 in 2023, with the Interim SA Report explaining:
- “Next is LPR29, which is a reasonable option to consider for employment growth, given the current focus of employment land at the eastern edge of Bicester. However, it is generally the case that land east of Bicester is less-well linked in transport terms. There are limited constraints in some respects, and it is noted that the nationally available (low accuracy) agricultural land quality dataset suggests grade 4 quality land (in contrast to land north of Bicester, where the dataset suggests grade 3). However, there is a large area of surface water flood risk, including related to the adjacent railway, and there is a need to be mindful of downstream flood risk affecting Bicester, albeit it is primarily (or exclusively) employment areas that are at risk. Also, it is noted that the Landscape Study assigns ‘moderate’ sensitivity to land here, which amounts to relatively high sensitivity in the Bicester context (there is a notable density of footpaths in this area), and there is a potential concern regarding effective containment, i.e. a risk of ‘sprawl’.”*
- 5.4.51 These conclusions still hold true at the current time, plus certain other constraints affecting the site are discussed in the HELAA, before a conclusion is reached that the site is not developable.
- 5.4.52 However, the HELAA does support a site for employment that comprises the part of **HELAA529** directly abutting the settlement edge, namely **HELAA339**. The HELAA concludes:
- “The site is considered suitable for employment development. The north of the site falls within Flood Zones 2&3 and the eastern site boundary abuts an Archaeological Area and a wooded area. The site is outside of the built-up limits of both Bicester and Launton, however the site is adjacent to employment land to the north (Employment Land at North East Bicester [Policy Bicester 11]). The railway line runs between the northern and southern parcels of the site, which helps to prevent the coalescence of Bicester and Launton. The site has good existing access via the A4421 roundabout, which also provides good onwards links to the A4421 and A41. Residential uses on this site would not be suitable as the site is located away from services and facilities and its development would likely promote significant car dependent travel...”*
- 5.4.53 Final sites in this sector are then abutting Bicester Airfield and are not available for residential or employment development, including the site discussed in 2023 as LPR30 and also **HELAA086**.
- 5.4.54 The next sites to consider are those associated with Launton.
- 5.4.55 The Interim SA Report (2023) presented a detailed discussion, pointing out that sites discussed at the time as LPR26 (**HELAA178**) and LPR27 (**HELAA179**) are permitted such that there is limited case for further growth at the village (also noting a signalised narrow bridge over the railway linking to Bicester).
- 5.4.56 **HELAA275** to the north of the village was flagged as potentially the sequentially preferable location for any further growth, at which time it was discussed as LPR28, but the HELAA does not support this site for quite clear cut reasons. The Interim SA Report (2023) stated: *“LPR28 – might deliver a modest expansion to Launton... and benefits from being located on the Bicester side of Launton but is adjacent to the Grade I listed parish church, manor farm (where there is a Grade II\* listed tythe barn) and the railway line.”*

- 5.4.57 Finally, with regards to Launton (which is also discussed below under the 'rural area' heading), the Interim SA Report (2023) suggested that **HELAA308** *"could be a reasonable option to consider for employment land"*; however, this site is not supported by the HELAA (2024).<sup>14</sup>
- 5.4.58 The next sites to consider would involve an extension to the permitted SE Bicester strategic urban extension. Figure 5.17 shows the masterplan for the primary component of the permitted site (Wretchwick Green), which was granted permission in 2018, subsequent to the bulk of employment land gaining permission earlier (Symmetry Park, which is now complete and also expanded to the northeast).
- 5.4.59 There are two adjacent sites to consider:
- **HELAA377** – was proposed for employment land in 2023 and there remains support for this allocation at the current time. The HELAA notably finds that: *"The existing development to the east of the site would act as a defensible boundary to limit further extension to the east."*
  - **HELAA436** – was a proposed strategic urban extension for 800 homes in 2023 and was judged to perform strongly to the extent that its allocation was held constant across the reasonable alternative growth scenarios. However, this decision was reached on balance,<sup>15</sup> and the Draft Plan appraisal (Part 2 of the ISA Report, 2023) did raise a number of issues / identify some notable potential impacts.
- At the current time, the emerging proposed approach is not to allocate the site, including noting the altered strategic context (as discussed in Section 5.2) and given that delivery of the adjacent permitted site is significantly delayed (including due to grid capacity issues). However, there remains a case for continuing to test the option of allocation through the appraisal of reasonable growth scenarios. The site is identified as developable within the HELAA, which records a potential capacity of 1,500 homes plus employment land, but the assumption here (for the purposes of defining and appraising growth scenarios) is a scheme of ~800 homes as per the proposed allocation from the Draft Plan stage.
- 5.4.60 Figure 5.18 shows a high-level concept masterplan for HELAA436 (as it stood in 2023). The site is discussed further below as SE Bicester, but this is not to be confused with the adjacent committed urban extension (known as Wretchwick Green).
- 5.4.61 Finally, with regards to this sector of the urban edge (south of EWR and north of the A41), HELAA072 was discussed as LPR24 within the Interim SA Report (2023) but was rejected as it comprises a local wildlife site and is adjacent to the committed "nature conservation area" shown in the Figure 5.17, below.

<sup>14</sup> Section 5.4 of the ISA Report discussed the site as LPR25 and stated: *"LPR25 – could be a reasonable option to consider for employment land, specifically as an extension to Bicester Park. The possibility of further growth in this broad area might be considered, given road links to Bicester via the A4421, which has recently been upgraded as part of East West Rail works, to include a cycle path. However, it is nonetheless the case that the road link to Bicester is indirect, given intervening employment land. Also, the Landscape Study identifies land here as relatively sensitive in landscape terms, noting that Launton is a 'well-defined nucleated' village. It is also noted that there is a high density of historic field boundaries... as well as two public footpaths that link nearby communities to Launton, including its two public houses and grade 1 listed church."*

<sup>15</sup> Section 5.4 of the ISA Report discussed the site as LPR21 and stated: *"There are a number of constraints to further expansion of [the permitted Wretchwick Green strategic urban extension] to the east... namely: a large local wildlife site, associated with an area of 'lowland meadow' priority habitat; Blackthorn Hill, which is associated with two windmills, one of which is Grade II listed, as well as a bridleway; overall 'medium-high' landscape sensitivity, according to the Landscape Study (such that this is one of the two most sensitive Bicester landscape parcels); a degree of surface water flood risk; and the possibility of better quality agricultural land than the adjacent committed site (according to the nationally available dataset). However, transport connectivity terms, the option of further expansion of Bicester in this direction performs well, relative to the alternatives, with good connectivity to the A41, and good cycle connectivity to the town centre / railway station, albeit the B4100 / EWR level crossing is a constraint, given East-West Rail (although options for addressing the constraint are under consideration), and there is a wider concern regarding connectivity to the M40 / Oxford in the absence of a southern link road..."*

**Figure 5.17:** The committed Wretchwick Green (SE Bicester) strategic urban extension



**Figure 5.18:** The promoter's vision for SE Bicester including HELAA436 (darker colour) from 2023



- 5.4.62 Moving west are sites that would involve an extension to the Graven Hill and/or Ambrosden.
- 5.4.63 Beginning with **HELAA490** adjacent to the west of Graven Hill, this site was discussed as LPR40 in 2023, with the conclusion that it *“performs relatively poorly, given clear access challenges / poor transport connectivity, mindful of: current access by rural lanes; the adjacent military railway / sidings; adjacent existing / former MOD buildings that fall outside of the current Graven Hill masterplan also the masterplan presented as part of planning application 21/03749/F; and an area of scrub or tree planting.”*
- 5.4.64 However, the HELAA now supports the site for employment land, concluding:
- “The site is suitable for employment uses. The site is located within one of the four areas identified as being the most accessible or capable of being most accessible within the district. The site is considered to be unsuitable for residential development within the adopted Development Plan due to its isolated nature. The suitability of development at the site would depend upon its integration with the Graven Hill allocation site to the north. The development of the site would represent substantial encroachment into the open countryside. The boundary to development at the Graven Hill allocation site to the north is presently formed by the railway line. The site could be unlocked by the proposed SE link road, which would provide investment and improved strategic links in this area...”*
- 5.4.65 Perhaps the key point to note is that the proposed route for the SE link road passes through the site, and assuming that the link road delivers then the site would represent a logical location for employment land. Development might ‘complete’ the expansion of Bicester in this direction, given the flood risk zone to the south, and along with biodiversity and historic environment constraints to the west and south. There would also be the potential to consider the future of the railway sidings (use for freight has been suggested).
- 5.4.66 Moving on to sites directly associated with Ambrosden, the Interim SA Report (2023) presented a detailed discussion, specifically in respect of LPR22<sup>16</sup> and LPR23.<sup>17</sup> However, the situation has now moved on, including following: **HELAA479** being granted permission for 75 dwellings in December 2023; **HELAA406** being granted permission for 55 homes in July 2024; and then **HELAA305** being granted permission at appeal for 120 homes in July 2024. The HELAA supports other sites at Ambrosden, most notably **HELAA077**, but there is no strategic case for directing further growth to Ambrosden through the LPR.
- 5.4.67 The final sites to consider are located to the west and southwest of Bicester, including sites associated with Chesterton, Wendlebury, Bignall Park and Junction 9 of the M40.

<sup>16</sup> The Interim SA Report stated: “LPR22 – would involve expansion of Ambrosden. There is some opportunity here, but there is no reason to suggest any particular benefit to developing LPR22 in full, i.e. there is limited ‘strategic’ growth opportunity. Considerations include: transport connectivity, e.g. noting the cycle path along Ploughley Road, to the north; in-combination traffic impacts, mindful of nearby committed and further potential strategic growth; maintaining Ambrosden’s association with Blackthorn Hill; quite weak field boundaries in this area; grade 3 quality agricultural land (according to the national dataset); significant recent housing growth, most recently a site granted permission at appeal for 84 homes to the west of the village (which will generate traffic through the village); and two pending planning applications to the east of the village.”

<sup>17</sup> The Interim SA Report stated: “LPR23 – might feasibly be delivered in part in order to deliver an extension to Graven Hill or, alternatively, in full in order to deliver comprehensive growth between Graven Hill and Ambrosden. The former option may have a degree of merit, given good potential to draw upon an area of priority habitat woodland / surface water flood risk (including an area of former quarry) as an eastern boundary. Development might relate quite well to the eastern extent of the Graven Hill scheme, as understood from the current masterplan... and could potentially link well to the A41; however, the southern extent of Graven Hill... is set to deliver extensive employment land. A constraint is a historic farm at the northern extent of the site, associated with two Grade II listed buildings; however, it is noted that the farm is set well-back from roads in the area, and there are no public rights of way in the area, so there could be an opportunity to increase appreciation. It is also noted that the nationally available dataset suggests grade 4 quality agricultural land in this area. The latter option (development of LPR23 in full) would involve breaching the area of woodland / surface water flood risk and closing the landscape gap to Ambrosden. The concern is that development here would amount to an extension to Ambrosden more so than an extension to Bicester, given challenges in respect of linking to the A41. Specifically, there is an area of land between the site and the A41 that has not been made available for development. Were this land to be made available, then the possibility of comprehensive growth in this area - completing the expansion of Bicester as far as Blackthorn Hill or Blackthorn / the Upper Ray Meadows (bounded to the north by the railway line) - might be considered. Comprehensive growth might be in combination with other LPR sites in the vicinity and might facilitate delivery a southern link road (discussed above). However, the unavailable land in question is significantly affected by surface water flood risk. Also, it is noted that the nationally available dataset shows grade 3 quality land in this area, associated with Blackthorn Hill. Ambrosden is clearly associated with the hill, and there is an argument for retaining this characteristic feature. Finally, there is a need to be mindful of the proposal to deliver a major new area of employment land at the southern extent of Graven Hill (see the committed Graven Hill masterplan at 21/03749/F).”



5.4.68 Beginning with land adjacent to Junction 9 of the M40, there is a clear case for supporting employment development within **HELAA113**, including because part of the site is already permitted. This was the proposal at the Draft Plan stage, and there remains a strong degree of support at the current time.<sup>18</sup>

5.4.69 Land to the east (south of Chesterton, and adjacent to the A41) then comprises sites **HELAA111** (west) and **HELAA527** (east), which were jointly discussed as LPR37 within the Interim SA Report, as follows:

*“LPR37 – were LPR38 to come forward as a new strategic employment area, then it would increase the argument for strategic growth south of Chesterton (LPR37), in order to largely ‘complete’ the expansion of Bicester in this sector. Chesterton is a smaller village in the settlement hierarchy, but there is a primary school, e.g. in contrast to the nearby smaller village of Weston-on-the-Green. There are also limited constraints in some respects, notably in terms of landscape sensitivity and agricultural land quality (discussed above). However, a primary argument for strategic growth in this area relates to transport connectivity, given an established ambition to develop the A41 corridor as a route that prioritises bus travel and walking/cycling. There is already a park and ride, serving the S5 ‘Stagecoach Gold’ service and a high quality cycle route into Bicester, albeit this is somewhat distant from developable part of LPR37 (as discussed below). The A41 ambition was discussed in LTP4 (2016), and then an update is presented in the Oxfordshire LTCP (2022; see page 168). It is also important to note that there is good potential to achieve good road access to land here from the existing road network.*

*With regards to constraints to growth, a key consideration is the Chesterton Conservation Area, which extends to the southern extent of the town, albeit the southern extent of the conservation area may have relatively low sensitivity. More generally, there is a need to note that a Roman Road (Akeman Street) passed through Chesterton. However, there would be good potential to mitigate historic environment impacts through masterplanning, plus it is noted that a 63 homes scheme has recently been delivered at the southern extent of the village. Beyond historic environment constraint, there is a need to note several narrow flood channels passing through the site, although these are mostly associated with field boundaries, suggesting good potential to integrate with green infrastructure. Also, it is noted that a planning application for 147 homes south of Chesterton was recently refused (ref. 23/00173/OUT).*

*Finally, with regards to LPR37, there is a need to note that the eastern half of the site is only being promoted for employment land, which is not supported, given the aspiration of consolidating the built-form of Bicester. Specifically, there is a clear argument for strategic housing-led growth at Chesterton to integrate with Bicester, via an improved A41 corridor, whilst retaining Chesterton’s local character and identity. There is the possibility of reimagining this corridor, with a focus on active and public transport, including linking the P+R to Bicester Village, if and when a southern link road is delivered.”*

5.4.70 Ultimately, in 2023 the proposed approach involved an allocation for 500 homes in HELAA111 and non-allocation of HELAA527, and this approach was judged to perform strongly to the extent that it was held constant across the reasonable alternative growth scenarios. However, this decision was reached on balance, and the Draft Plan appraisal did raise a number of issues / identify some potential impacts.

5.4.71 The situation has now moved on in several regards, including because the aforementioned site for 147 homes at Chesterton was granted permission at appeal in May 2024, and the latest proposed approach is to support a comprehensive employment ‘gateway’ across both HELAA111 and HELAA527.

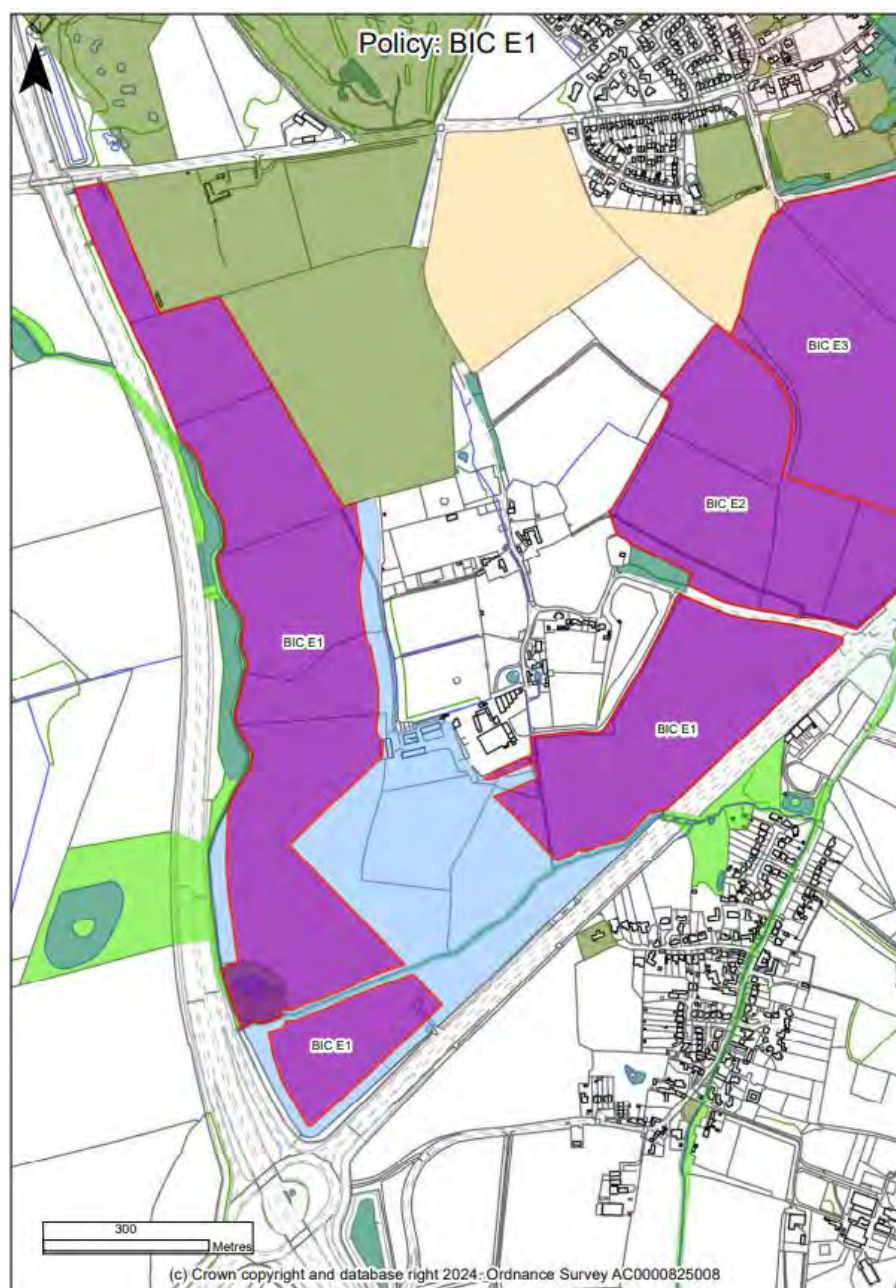
5.4.72 There is considered to be a clear logic to this approach, including from a perspective of maintaining the character and function of Chesterton as a smaller village, and because this land links so effectively to the M40 corridor. The logic of mixing residential and employment uses (which will include B8 warehousing, which can be a ‘bad neighbour’ use) was always questionable, and there is now a good degree of confidence regarding the potential for an employment focus here to facilitate delivery of the SE link road.

<sup>18</sup> Within Section 5.4 of the ISA Report the site was discussed as LPR38 and the report explained: “LPR38 – is an option to deliver a strategic new employment area, given excellent road connectivity, namely a location at the junction of the A41 and the M40. This would be a major extension to a large scheme adjacent to the motorway junction that now has planning permission (ref. 22/01144/F) for “a new high quality combined research, development and production facility of 54,000 sq m designed specifically for Siemens Healthineers” that would create “up to 1,200 skilled jobs... when the facility is fully operational” (plus the scheme would assimilate an existing facility at Eynsham). Looking beyond the Siemens site, there is the potential to comprehensively plan for a wider employment area and then, in turn, potentially the entire sector of land between Chesterton / Bicester Golf Club and the A41. Also, it is noted that land adjacent to the north is permitted to deliver a major new sports facility (ref. 19/00934/F). The landscape in this entire sector has ‘low-medium’ sensitivity, according to the Landscape Study, and this is grade 4 agricultural land, according to the national dataset... However, there are a range of sensitivities, including some flood risk, including associated with some priority habitat, and the small hamlet of Little Chesterton, where there are no listed buildings, but nonetheless a sense of rural / historic character (albeit appreciation by nearby communities could be relatively limited...).”



- 5.4.73 A benefit is also around protecting Little Chesterton and maintaining a rural setting to Chesterton (to include Little Chesterton). However, there does remain a need for an ongoing focus on ensuring that planning for this land is undertaken in a comprehensive fashion with a long-term perspective. The figure below shows the emerging proposed approach involving permitted employment (light blue), proposed employment (purple), permitted residential (beige) and greenspace including the new sports facility.

**Figure 5.19:** The emerging proposed approach for land south of Chesterton



- 5.4.74 Wendlebury can also be seen on the figure above, and the option of strategic growth here was closely considered through the appraisal of reasonable alternative growth scenarios in 2023, although it was then not taken forward as a preferred option / proposed allocation in the Draft Plan. The key site here is **HELAA470**, which was discussed as LPR39 within Section 5.4 of the Interim SA Report, as follows:

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

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

- 5.4.75 The HELAA does not support this site; however, there is considered to be a strategic case for continuing to explore the possibility of strategic growth here, including noting the new proposal for comprehensive employment-growth to the north of the A41. See further discussion below.
- 5.4.76 The final sites are then located directly to the west of Bicester and adjacent to Bignall Park, namely:<sup>19</sup>
- **HELAA507** – is located in the gap between Bicester and Chesterton and would not relate well to either.
  - **HELAA531** – was discussed as LPR36 in 2023, at which time the discussion in Section 5.4 of the ISA report served to highlight onsite and adjacent constraints associated with Bignall Park, and also pointed out that expansion of NW Bicester in this direction would likely not help with delivering the site. The HELAA at the current time does not support the site and explains that it is available only for residential or a mix of uses, i.e. is not available for an employment only scheme (noting adjacent employment land).

#### Conclusion on sub-area scenarios

- 5.4.77 The first point to make is that there is support for the changes to North West Bicester. The complex story over time is set out above, but relative to the 2023 Draft Plan stage the proposal is to significantly extend the site but only to boost assumed supply by 500 homes (and so a 1,500 home increase relative to the adopted allocation), which serves to negate concerns flagged in 2023 regarding a boost to densities.<sup>20</sup>
- 5.4.78 The proposal is to present NW Bicester as an adjusted committed site, as opposed to presenting the proposed extension as a new allocation. This being the case, completions and commitments at Bicester total 7,749 homes in the plan period, plus 4,300 homes at NW Bicester will deliver beyond the plan period.
- 5.4.79 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 comfortably above the 20,029 homes figure discussed in Section 5.2 as a reasonable lower growth housing requirement. As such, reasonable **sub-area scenario 1** involves no new LPR growth.
- 5.4.80 However, there is also a 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 HELAA436 (SE Bicester), which was judged to be a strongly performing site in 2023 (albeit under a different strategic context). The appraisal did flag some concerns, including noting that the site would extend a permitted strategic urban extension, but the site benefits from a location on a strategic transport corridor, 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, 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**.

<sup>19</sup> For completeness, one other LPR site was discussed in the Interim SA Report, namely LPR41. The report explained: "Finally, LPR41 comprises sports pitches adjacent to the north of Bicester Village, and to the south of Bicester Community Hospital, in close proximity to the town centre. An application has recently been submitted for a new 1.8-hectare community park, together with a new car and cycle hub and improvements to guest services at Bicester Village; see [bicesterpublicconsultation.co.uk/](https://bicesterpublicconsultation.co.uk/). A key consideration is ensuring a strategy for Bicester Village that aligns with long term plans for the A41 corridor, with an aspiration for greater use of a Park and Ride to access Bicester Village."

<sup>20</sup> The Interim SA Report (2023) explained: "The current proposal is to support delivery of an additional ~1,000 homes [without extending the built footprint], which is a significant increase in capacity / density, such that this figure will need to be kept under review, including with a view to ensuring a scheme with a strong green and blue infrastructure network integrated throughout (also a good mix of homes, to include family housing, and good space standards). However, at the current time, it is not clear that there is an alternative, lower growth figure that would achieve the deliverability objectives."

- 5.4.81 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 2,850 homes. The site (HELAA227) was shown to have a range of issues/impacts through the appraisal, no support for the site was found through the consultation and the 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 link 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 2,850 homes including with a significant part of the scheme within the flood risk zone (the 2023 consultation response refers briefly to a mitigation, but it is not clear precisely what this involves / would involve). 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.
- 5.4.82 Finally, with regards to Wendlebury, there is the question of whether it should be assumed to deliver: A) in addition to SE Bicester (as the sequentially less suitable site) such that its allocation would involve a high growth strategy for Bicester; B) in place of SE Bicester 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**.
- 5.4.83 Finally, whilst there are several other omission sites subject to limited constraint, these tend not to align well with strategic objectives for Bicester particularly around transport and/or are in relative proximity to NW Bicester, which must be supported to now deliver in a timely manner. In particular:
- At Ambrosden whilst there are sites supported by the HELAA, there is not considered to be a strategic case for a LPR allocation, including given the extent of recent and committed growth.
  - To the north of the A41 there is clear support for a comprehensive employment gateway, although ongoing consideration might be given to whether there are any strategic opportunities (benefits for the village) to be realised by supporting some further housing growth within the northern part of HELAA111.
  - The east of Bicester there is the option of further employment land, but there are preferable locations, and the time for reconsidering this option could be subsequent to clarity around a southern link road.
- 5.4.84 In conclusion, there are **three sub-area scenarios** taken forward to Section 5.5. 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 (plus a new proposed site on the A41 to the east and another adjacent to Glaven Hill), but there are alternative approaches that could be considered, including the option of lower growth. Employment land is discussed further in Section 5.5.

**Table 5.2:** Three reasonable housing growth scenarios for the Bicester sub-area

	Number of homes		
	Scenario 1	Scenario 2	Scenario 3
Completions and commitments	7,749 (plan period)		
SE Bicester	-	800	
Wendlebury	-	-	1,000
<b>Total</b>	<b>7,749</b>	<b>8,549</b>	<b>8,749</b>

## Kidlington

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

### Edge of Woodstock

- 5.4.88 **HELA329** was a proposed allocation in 2023 and was judged to perform strongly to the extent that allocation was held constant across the reasonable alternative growth scenarios at that time.
- 5.4.89 It is notably located outside of the Green Belt, and is well-connected in transport terms, given: a location at the intersection of the A44 (a key strategic public transport and cycling corridor) and the A4095, which links to Bicester and Witney; and excellent potential to cycle to employment opportunities (Langford Lane / Oxford City Airport). Allocation will help secure strategic transport improvements in the 'North Oxfordshire Corridor' including a new public transport hub at London Oxford Airport.
- 5.4.90 The site is quite well-contained in landscape terms, in that it is bounded to the west by the Woodstock urban edge (a site under construction, nearing completion) and by roads on the other sides (along with thick hedgerows / tree belts). However, an issue is that the site contains a scheduled monument (Blenheim Villa) as well as a wider area of archaeological interest at its western extent, plus there is significant noise pollution associated with the road junction, leading to a need to focus built form at the northeast corner of the site. This was the approach reflected in a recent withdrawn planning application for 500 homes (ref. [22/01715/OUT](#)), and officers now believe an appropriate capacity is 450 homes (N.B. the site has a longer planning history, including a 2014 application for 1,500 homes, plus land for a primary school, across both this site and the site now under construction to the east).
- 5.4.91 Any scheme would have to be 'heritage and landscape-led', delivering extensive greenspace including to minimise concerns regarding impacts to nearby Blenheim Palace World Heritage Site. This potentially gives rise to a tension around linking effectively with Woodstock (the centre of which would be ~1.5km distant, although new facilities have been delivered as the town has expanded east over the years, and the town's secondary school is within 400m of the site). However, work is ongoing to explore options.
- 5.4.92 Finally, a key issue is access to a primary school, as there would be no potential to deliver one onsite. Further work is needed to identify the most appropriate strategy (as per the situation in 2023).

### The edge of Oxford

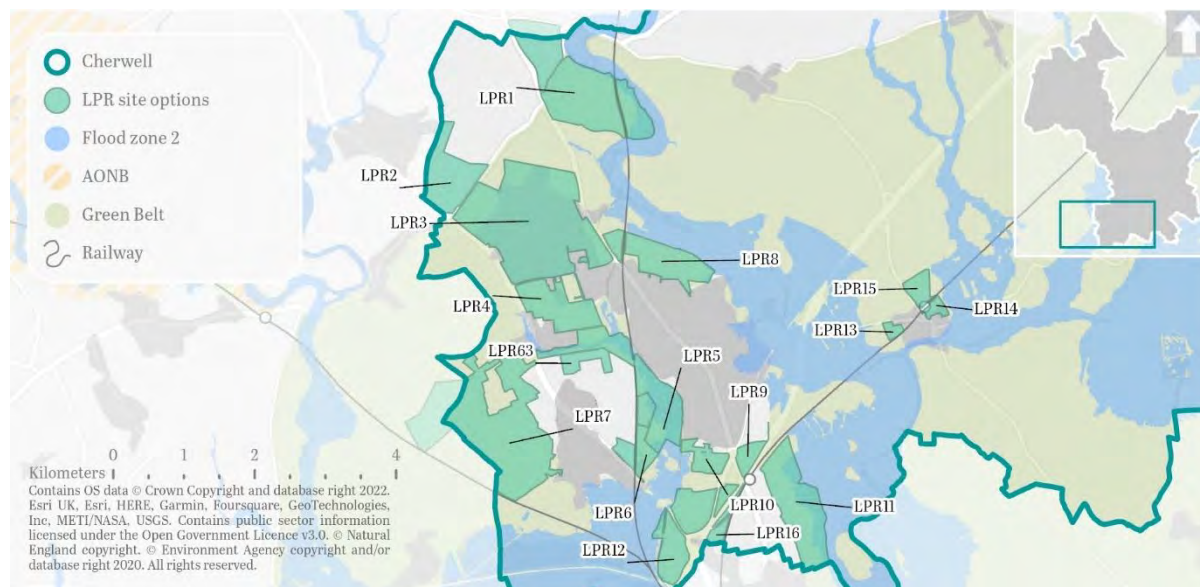
- 5.4.93 The equivalent section of the Interim SA Report (2023) presented a detailed discussion of three 'LPR sites' here, namely LPR11, LPR12 and LPR16 (see Figure 5.20). However, there is not considered to be a need to dwell on options for growth in this area at the current time, recognising the Green Belt constraint, the extent of committed growth and the need to liaise closely with Oxford City Council on growth options.<sup>21</sup>

<sup>21</sup> Of particular note was the discussion of LPR11, in respect of which the ISA Report explained: "LPR11 – would involve extending Partial Review allocation 6a (690 homes plus a local centre and a primary school). There is an argument for this on account of the adjacent Parkway station, and because the River Cherwell flood risk zone might form a long term defensible Green Belt boundary. However: an extended scheme would deliver little over-and-above the committed scheme, other than additional housing; it is generally the case that issues / options in this area were considered at the time of preparing the Partial Review, and the committed scheme involves a proposal for new greenspace to form a defensible Green Belt boundary, and also mindful of heritage assets at St. Frideswide Farm (including a Grade II\* listed farmhouse). The Landscape Study assigns LPR11 only 'medium' sensitivity; however, there is a clear sensitivity regarding encroachment on the River Cherwell corridor (mindful that public accessibility along the river corridor could potentially be enhanced in the future). An expanded scheme drawing on field boundaries and/or the flood risk zone as a defensible boundary (also mindful of significant surface water flood zones) could feasibly be explored, but the effect would be to delay the scheme coming forward and delivering much needed new housing..."



- 5.4.94 The option of Green Belt release feasibly remains open to the Council, but there is a need to demonstrate 'exceptional circumstances', which is inherently challenging on account of extensive non-Green Belt options for growth, including options for growth at Banbury and Bicester discussed above. Also, within the Oxford Green Belt there is an arguably preferable option for growth located at Kidlington (as opposed to on the edge of Oxford), as discussed further below.

**Figure 5.20:** A figure from the Interim SA Report (2023) showing strategic site options in the Kidlington area



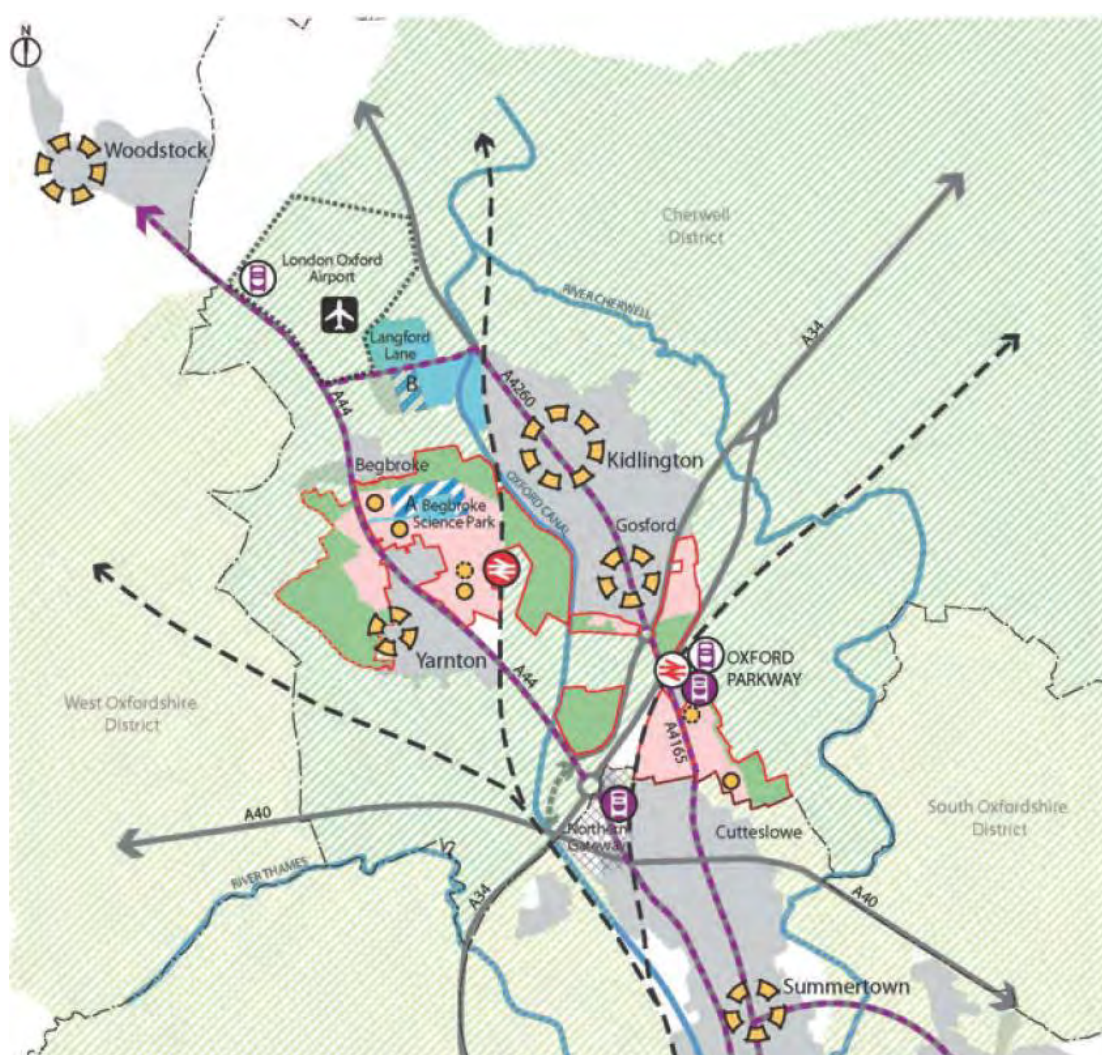
#### Yarnton / Begbroke

- 5.4.95 Again, whilst the Interim SA Report (2023) discussed six LPR sites in turn (LPR sites 4, 5, 6, 7, 9, 10) there is not considered a reasonable need to dwell on allocation options at the current time, noting that in September 2024 the Council resolved to grant planning permission for a major mixed-use scheme (23/02098/OUT) in line with Partial Review allocation PR8 (Land East of the A44).
- 5.4.96 On this basis, it is evident that good progress is being made towards delivering on the growth strategy for this area committed through the Partial Review – see Figure 5.21. N.B. one point to note is that the new station for Yarnton / Begbroke shown on the figure is now not expected to deliver in the near future.
- 5.4.97 A key point to note is that the recent permission includes land safeguarded for employment through the Partial Review that was discussed in 2023 as LPR63. The focus in 2023 was squarely on LP63, with the report explaining that the six remaining LPR sites “perform relatively poorly” including recalling that all fall within the Oxford Green Belt (LPR63 had previously been removed from the Green Belt).
- 5.4.98 Of the remaining LPR sites, attention potentially focuses on LPR4, which would involve extending Begbroke to the north and closing the gap to the Langford Lane employment area.<sup>22</sup> Also, the possibility of further growth in this sector of land might be considered alongside a strategic review of uses/land at Oxford City Airport (LPR3, which relates to Kidlington more than Yarnton / Begbroke).<sup>23</sup>
- 5.4.99 It is recognised that this is a thriving employment cluster and that growth here could align with national aspirations in respect of supporting “high-potential clusters” (Draft UK Industrial Strategy, 2024). However, the right time for reconsidering the future of this area will be once existing housing, employment and infrastructure has delivered, and key partners have undertaken further work to establish long term visions.

<sup>22</sup> In respect of LPR4, the Interim SA Report explained: “There are two fields feasibly in contention for allocation, with the western field constrained by airport flight path, such that it likely only comes into contention for employment land. The eastern field might deliver housing and/or employment but is sensitive from a Green Belt perspective (albeit the landscape study assigns only ‘low-medium’ sensitivity) and is within ~200m of a SSSI. A third and final part of the site comprises current built form, including an ambulance station.”

<sup>23</sup> In respect of LPR3, the Interim SA Report explained: “There is an argument for reviewing the Green Belt to remove existing employment land, and there is also the option of considering a modest eastwards expansion of this thriving employment area into the Green Belt, noting that some of the land here makes only a ‘moderate’ contribution to Green Belt purposes. With regards to the wider airport, this is not a realistic option at the current time, including as the airport is well-used, serving an extensive area (e.g. Silverstone) and with a clear role in the local economy. The airport benefits from permitted development rights, supportive of airport related development.”



**Figure 5.21: The Partial Review Key Diagram**

### Kidlington

5.4.100 The primary site to consider here is **HELAA152**, which was a proposed allocation at the Draft Plan stage (2023), although this was marginal, particularly on account of the site comprising Green Belt. As such, the site was also explored as a variable across the reasonable alternative growth scenarios appraised within the Interim SA Report (specifically, the site was not allocated under several of the growth scenarios).

5.4.101 The site was introduced as LPR8 within Section 5.4 of the Interim SA Report (2023), as follows:

*“... the Green Belt Study finds the part of the site closest to the settlement edge to make only a ‘moderate’ contribution to Green Belt purposes. Furthermore, the option of development here has merit in wider planning and sustainability terms, such that there could be potential to demonstrate exceptional circumstances for Green Belt release. In particular, the site benefits from excellent proximity and walking/cycling connectivity to strategic employment land (Langford Lane / Oxford City Airport, also Begbroke Science Park) and Kidlington centre. Also, there is an argument for housing growth at Kidlington, which is associated with relatively low recent and committed housing growth, as a proportion of dwelling stock, relative to Banbury and Bicester, which could have a bearing on relatively high house prices (also, anecdotal evidence suggests a prevalence of properties being sub-divided), albeit there is high committed growth in the wider sub-area. As well as a need to ensure a new defensible Green Belt boundary, and avoid encroachment on the River Cherwell, a key sensitivity is Kidlington Conservation Area, which abuts the site to the east, including a prominent Grade I listed church. There is also a need to consider the Oxford Canal, to the west, where a Grade II listed canal bridge is linked to the conservation area by a historic footpath that passes adjacent to the site, via a Grade II listed railway bridge.”*

5.4.102 The points hold true at the current time, and the HELAA (2024) also sets out: *“The combined landscape sensitivity of the site is considered to be medium and visual sensitivity to be medium to high. The site has a relationship with the open landscape to the north and to the historic environment to the east...”*

5.4.103 Further considerations relate to: A) achieving good access to the site from the Moor is understood to be challenging, but there is no clear reason to suggest that there is not a technical solution; and B) the proposal in 2023 is to deliver a new cricket club, but there is a lack of evidence to suggest a clear/strong need for this, given the existing cricket club site at Stratfield Brake, albeit there is an acknowledged need to take a long-term strategic approach to sports facilities in support of a growing settlement.

### Islip

5.4.104 The HELAA identifies four sites as deliverable or developable, despite falling within the Oxford Green Belt, namely **HELAA144, 331, 452 and 471**. The combined capacity is in the region of 272 homes.

5.4.105 Focusing on HELAA144, to the north of the village, this is a brownfield site but the Interim SA Report (2023) raised a concern regarding growth here from a Green Belt perspective. With regards to the other options, the Interim SA Report (2023) favoured the option of growth to the east of the village (LPR14).<sup>24</sup>

5.4.106 There is a case for housing growth at Islip given limited recent growth and a train station.<sup>25</sup> However, Islip is a category B village in the settlement hierarchy, which greatly limits the strategic case for growth, and there are considerations around the in-combination effects of growth across these sites, including from a Green Belt and transport perspective.

5.4.107 This being the case and given the strategic context in respect of the number of homes needed district-wide, it is considered reasonable not to take forward any option involving Green Belt release for small or medium-scale growth at Islip. There is greater potential to demonstrate exceptional circumstances for Green Belt release at Kidlington (HELAA275), and cumulative Green Belt impacts can be a factor.

### New settlement options

5.4.108 On the one hand there is limited numerical argument for allocating a new settlement, given the number of homes that could potentially be delivered by a focus of growth at Banbury and Bicester, as discussed above, plus there is the option of an urban extension to Kidlington (as discussed). Also, any new settlement would ideally only be allocated subsequent to work to consider (i.e. compare and contrast) options across the Oxford sub-region as a whole. However, on the other hand, there is a need to explore high growth options and options involving taking a long-term vision-led approach to growth in the Oxford sub-region in the absence of a sub-regional plan.

5.4.109 There is a long list of three new settlement options feasibly in contention: Weston-on-the-Green, Islip and Shipton Quarry. However, Weston-on-the-Green has already been discussed above, and is considered to be the sequentially least preferable option of the three, particularly on transport grounds, albeit it is located outside of the Green Belt, whilst the other two sites are located within the Green Belt.

5.4.110 This leaves two options associated with the Kidlington sub-area: Islip (**HELAA427**) and Shipton Quarry (**HELAA484**). Both are associated with a wide range of issues / opportunities; however, on balance, Shipton Quarry is considered to be the preferable option to explore further. Islip already benefits from a rail station, whilst the proposal at Shipton Quarry is to deliver a new station; however, there are clear Green Belt, road transport and historic environment sensitivities at Islip; and, whilst flood risk zones could assist with containment, there are challenges associated with slightly raised land directly to the northwest of the village and the former fuel depot directly to the northeast. Another consideration is that Shipton Quarry could be well-placed to deliver significant employment land (discussed further in Section 5.5).

<sup>24</sup> The Interim SA Report (2023) explained: “LPR13 and LPR14... make a ‘moderate-high’ contribution to Green Belt purposes, according to the Green Belt Study (2022), and it is LPR14 that appears to be preferable site in transport terms, given that it is near adjacent to the train station and the primary school, and because there is the potential to reach the A34 without needing to pass through the conservation area (or, at least, its core). However, the site has been discussed as having a capacity of between 40-170 homes (mindful of an onsite grade 2 listed farmhouse, and also the near adjacent conservation area)... and it is not clear that the site would deliver any strategic benefit to Islip, other than new housing).”

<sup>25</sup> The Interim SA Report (2023) explained: “Islip appears not to have seen any significant housing development for at least 20 years (on the basis of clear satellite imagery from 2004) and, indeed, from a review historic OS maps it appears that the only significant housing growth for perhaps 50 or more years has involved a small number of homes (circa 30-40) to the west of the railway line. Another consideration is potentially around the small village primary school, where latest information shows a capacity of 120 students and a student roll of 93.”

- 5.4.111 There are also clear sensitivities at Shipton Quarry, including as the site is designated as a Local Wildlife Site (LWS) and a geological SSSI; however, the site benefits from being located at the edge of the Green Belt, with part of the site associated with relatively low Green Belt sensitivity; and the potential for sensitive development that addresses the biodiversity / geology constraint can be envisaged.
- 5.4.112 Much detailed work has been undertaken in support of proposals at both locations, with quite a wide range of options explored, which serves to highlight the challenging nature of the sites. Focusing on Shipton Quarry, the most recent proposal is for 2,500 homes, with the potential for a second phase extending the site further to the west also discussed; however, there is a concern that insufficient consideration is given to the onsite constraints, and so it is judged appropriate to assume 2,000 homes (as per in 2023).

### Conclusion

- 5.4.113 There is strong support for allocation of Land east of Woodstock, for 450 homes, albeit the site is not without its issues. This is **sub-area scenario 1**, and then there are two higher growth scenarios (as per 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**). A scenario involving allocation of both sites is not taken forward to Section 5.5 as a pragmatic step, plus all three growth locations could lead to in-combination impacts, e.g. on Kidlington (traffic) or the river corridor.
- 5.4.114 In summary, there are **three sub-area scenarios** taken forward to Section 5.5.

**Table 5.3:** Three reasonable housing growth scenarios for the Kidlington sub-area

	Number of homes		
	Scenario 1	Scenario 2	Scenario 3
Completions and commitments	A precise figure is not known, but it is known that: Kidlington and Woodstock are associated with 172 completions and no commitments; and the rest of the sub-area is associated with 4,400 homes committed growth following the Partial Review.		
East Woodstock	450	450	450
North of the Moors	-	300	-
Shipton Quarry	-	-	2,000

### Heyford Park

- 5.4.115 The equivalent section of the Interim SA (ISA) Report (2023) explained:

*“It is relatively straightforward to arrive at reasonable growth scenarios for Heyford Park, relative to the three sub-areas discussed above. There are clear arguments for exploring additional growth, and any further additional growth must be comprehensive rather than piecemeal; however, there is also a need to consider the option of no further growth at Heyford Park, e.g. noting relatively poor transport connectivity.”*

- 5.4.116 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 the appraisal (Section 6 of the ISA Report) flagged a range of issues and opportunities (also note that the site promoters concept master plan from 2021 was presented as Figure 6.1 in the ISA Report). For example, the appraisal found the site to be fairly unconstrained in biodiversity terms, although Berks, Bucks and Oxon Wildlife Trust then responded to the consultation: *“We are greatly concerned by the continuing development in this area which is exceptionally rich in high value wildlife sites, and species. The cumulative impact of this allocation, along with the potential nearby proposed NSIP, as well as continuing development at Heyford Park is of great concern... We will await further information but we may well object to this allocation.”*
- 5.4.117 The appraisal also included a focus on in-combination effects with growth at Bicester and potential growth at Shipton Quarry, with shared transport corridors obviously a key consideration, but another consideration being *“an ambition to deliver strategic enhancements along the River Cherwell / Oxford Canal corridor...”*
- 5.4.118 The 1,235 home scheme appraised was then taken forward as a preferred option within the Draft Plan, as explained in Section 7 of the ISA report, which explained (as a quote from CDC Officers):



*“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).”*

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

5.4.120 Firstly, the County Council is now clear that a 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 Figure 5.22, which is taken from the Transport Study, 2022).

5.4.121 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.

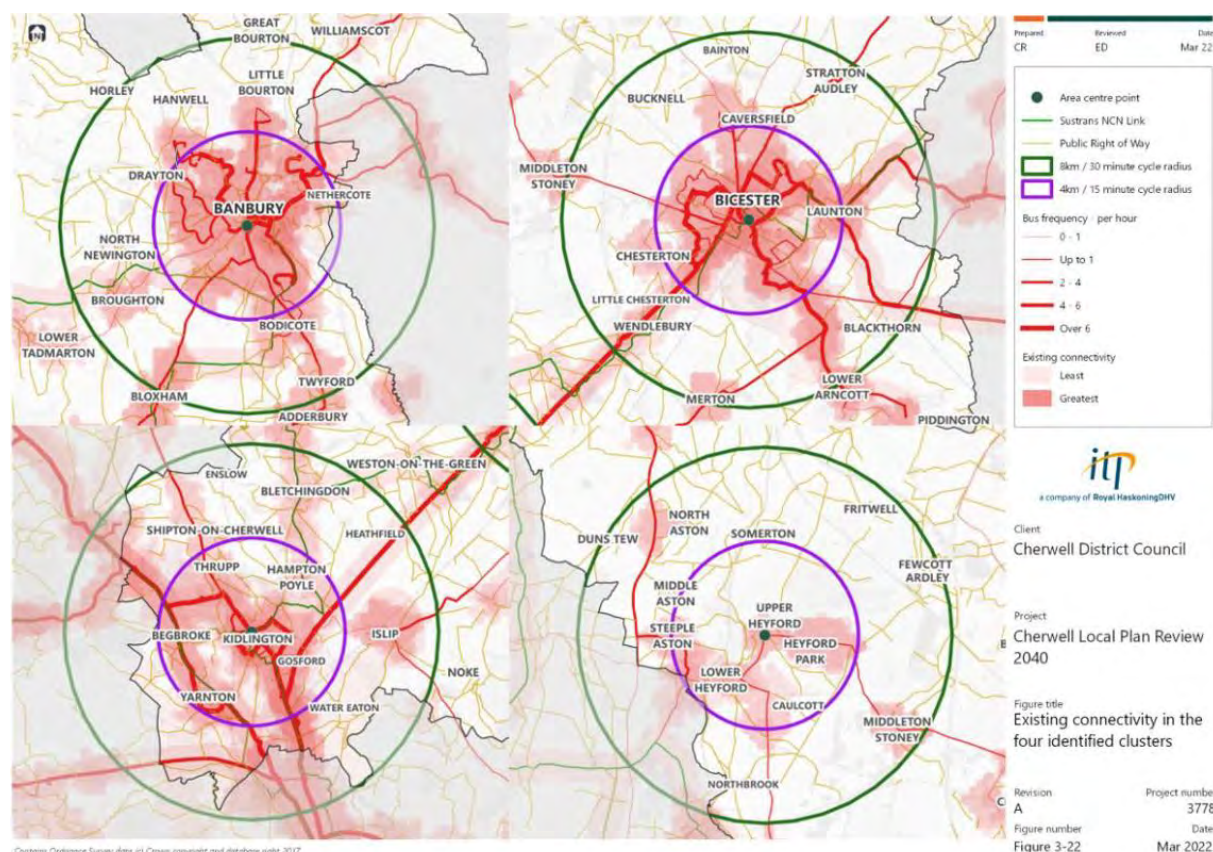
5.4.122 Finally, it is important to be clear that larger scale growth would require very detailed work to explore historic environment issues and impacts. Historic England stated through the consultation in 2023:

*“Historic England broadly supports the proposed new allocation [1,250 homes to the south], while seeking to avoid further intensification within the Upper Heyford conservation area, especially avoiding any development on the flying field.”*

5.4.123 In conclusion, there is only **one reasonable growth scenario** for Heyford Park at the current time.

**Table 5.4:** One reasonable housing growth scenario for Heyford Park

	Number of homes	
	Scenario 1	Scenario 2
Completions and commitments	1,601	-
<b>Total</b>	<b>1,601</b>	-

**Figure 5.22: Bus frequency along road corridors and overall connectivity of potential growth locations**

## The rural area

5.4.124 As discussed in Section 5.2, 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 able to deliver up to 24,022 homes (including completions, commitments and a windfall allowance) which compares to a minimum housing requirement of 20,029 homes (see Section 5.2).

5.4.125 However, on the other hand, recent and committed growth in the rural area is not evenly 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, as discussed. Finally, there is a need to recognise that Parish Councils are often 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.

5.4.126 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. Each of the category A villages is considered in turn below.

### Adderbury

5.4.127 The village has already been discussed above, on account of relating closely to Banbury and being associated with larger site options that could feasibly deliver strategic growth. The conclusion reached is that the village is not suited to being assigned strategic growth through the LPR, but the Parish Council requires a housing requirement to take forward through a neighbourhood plan.



- 5.4.128 The village has seen high recent growth, with 313 homes completed since the start of the plan period (2020), and a further 83 homes have permission. As such, there is a case for a modest housing requirement (which could then always be exceeded). On the other hand, the village benefits from good links to Banbury and the capacity of the three non-permitted HELAA-supported sites is 117 homes.

#### Ambrosden

- 5.4.129 The village relates closely to Bicester and has already been discussed above. There are several HELAA-supported sites, but there is very limited strategic case for growth given recent and committed growth within the Parish and nearby at Bicester, plus there is the option of further growth nearby on the edge of Bicester (SE Bicester). The Parish Council is not looking to prepare a neighbourhood plan.

#### Bletchington

- 5.4.130 A neighbourhood plan is being prepared jointly by Bletchington Parish and Hampton Gay & Poyle Parish, but the Parish Councils do not wish to allocate through the plan.
- 5.4.131 Bletchington is a relatively small village and is not well-linked to the strategic road network nor a train station, but the village does benefit from proximity to Kidlington. A scheme is nearing completion that delivers a village primary school alongside just 58 homes (including 18 affordable homes) and, in total, 113 homes delivered between 2020-24, but there is very low further committed growth (3 homes).
- 5.4.132 There are two HELAA supported sites with capacities of 81 homes and 44 homes respectively, but the smaller site is deemed more suitable and would deliver a more appropriate quantum of homes (it is not known that the larger site would deliver significant benefits over-and-above the smaller site).
- 5.4.133 As such, there is the option of allocating the smaller site through the LPR. The site is subject to very limited constraint but would involve a piecemeal extension of the scheme currently nearing completion (including a primary school) and would not draw upon a field boundary for containment, such that there is a concern regarding ongoing piecemeal expansion over time (which can typically lead to a risk of opportunities missed to deliver infrastructure, but it is not clear that this concern applies in this instance).

#### Bloxham

- 5.4.134 The village relates reasonably well to Banbury (the Transport Assessment, 2022, highlights the village as having good bus and cycle links), plus Bodicote and Adderbury are nearby. There has been piecemeal growth to the southeast over recent years, and 313 homes have delivered since 2020, with a further 31 homes are permitted. There is also a pending application for 150 homes (24/02541/OUT).
- 5.4.135 There are two HELAA supported sites with capacities of 83 homes and 73 homes respectively, both located at the southeast edge of the village adjacent to recently delivered sites, but the smaller site is deemed more suitable. The Parish Council is set to prepare a neighbourhood plan.

#### Bodicote

- 5.4.136 The village has already been discussed above as being associated with limited strategic case for growth on account of recent and committed growth, both within the Parish and very nearby at Banbury.<sup>26</sup>
- 5.4.137 However, there is one non-permitted HELAA-supported site, namely Bodicote House, which is located within the settlement confines and currently comprises the offices of Cherwell District Council. The site is clearly suitable for redevelopment, although the capacity is somewhat uncertain on account of the need to sensitively account for heritage constraints. On balance, at the current time capacity is thought to be around 75 homes. The Parish Council is set to prepare a neighbourhood plan.

<sup>26</sup> It can also be noted that the option of larger scale growth to the south was discussed as LPR53 within Section 5.4 of the Interim SA Report (2023). The report explained: "The Landscape Study does not examine this site; however, there is likely to be a degree of landscape sensitivity, with land at the southern extent of Bodicote gently falling away towards the Sor Brook, plus there is a high concentration of public rights of way nearby, including a bridleway that forms part of national cycle network. However, it is historic environment constraint that is potentially a foremost consideration, with the strong likelihood that expansion to the south of Bodicote would generate significant car trips through the village conservation area, plus there is historic environment value associated with the Sor Brook. Taking these constraints into account, alongside an understanding that Bodicote is a larger village in the settlement hierarchy, and mindful of the level of recent / committed growth at Bodicote and nearby (including a recent expansion to the south, adjacent to the A4260), LPR53 is judged to perform relatively poorly."

### Deddington

- 5.4.138 The Deddington Neighbourhood Plan was 'made' in late 2023 and includes an allocation for 85-90 homes. The allocation was made in light of a housing need assessment, and in light of recent completions and commitments, with 180 homes having completed between 2020 and 2025 and 18 homes with permission.
- 5.4.139 The ~90 home allocation in the made Neighbourhood Plan is not accounted for within the headline figure for completions and commitments district-wide that has been reported above (21,402 homes). As such, the intention is to assign 90 home housing requirement that has already been met.

### Hook Norton

- 5.4.140 The village is located in a rural area to the north of Chipping Norton (8km) and is a visitor destination on account of its brewery along with a large conservation area and a surrounding rolling landscape (the Cotswolds National Landscape is nearby). There has been modest growth over recent years to the north of the village, and 200 homes have completed since 2020 with a further 45 homes permitted.
- 5.4.141 There are two HELAA supported sites with capacities of 73 homes and 43 homes respectively, and the larger site is considered to be preferable. The Parish Council is set to prepare a neighbourhood plan.

### Launton

- 5.4.142 The village relates very closely to Bicester, where there is set to be high growth over the plan period, and within the parish there have been 133 homes completed since the start of the plan period and a further 69 homes have planning permission. There is only one very small non-permitted site HELAA-supported site, and the Parish Council is not looking to prepare a neighbourhood plan.

### Steeple Aston

- 5.4.143 A Mid Cherwell Neighbourhood Plan Review is in preparation for the parishes of Ardley, Fritwell, Kirtlington, Lower Heyford, Middle Aston, Middleton Stoney, Somerton, Steeple Aston and Upper Heyford.
- 5.4.144 Outside of Heyford Park Parish (where there is extensive committed growth associated with Heyford Park) there are 144 completions and 19 commitments, with the focus at Steeple Aston and Fritwell.
- 5.4.145 There are five entirely non-committed HELAA supported sites with a combined capacity of 59 homes, but also several committed sites that potentially have additional capacity.

### Yarnton

- 5.4.146 This area is set to be a focus of strategic growth through the Partial Review, and the Parish Council is not looking to prepare a neighbourhood plan. There is one small HELAA-supported site, but it is located within the settlement confines such that it could potentially come forward as windfall.

### Category B villages

- 5.4.147 There is very limited strategic case to directing growth to Category B villages (outside of support for appropriately located windfall sites); however, one Parish Council is set to prepare a neighbourhood plan and wishes to allocate, namely Milcombe, which is located close to Bloxham.
- 5.4.148 Milcombe has seen significant recent growth, with 84 homes completed since 2020, and a further 37 homes have permission, including a scheme for 35 homes recently allowed at appeal (22/02104/F).

### Conclusion

- 5.4.149 The table below presents a commentary on the emerging proposed approach. 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, and there is no clear case for exploring higher growth scenarios.
- 5.4.150 There is a case for exploring modestly lower growth (also adjustments to the approach taken in respect of LPR allocations versus assigning housing requirements), but lower growth scenarios would only involve modestly fewer homes, such that there is only **one sub-area scenario** to take forward to Section 5.5.

**Table 5.5:** Commentary on the emerging proposed approach to assigning growth in the rural area

Parish	Proposed approach	Commentary
Adderbury	75 home requirement	There is a clear case for a lower housing requirement, given recent and committed growth in the Parish.
Ambrosden	No new LPR growth	This approach is strongly justified.
Bletchington	Allocate a site for 44 homes	The site gives rise to few concerns other than on account of the lack of involving piecemeal / incremental growth and given the lack of a defensible boundary at its northern edge.
Bloxham	75 home requirement	There could be a case for a lower housing requirement, given recent and committed growth. However, it seems likely that the sites that will come into consideration for allocation will likely be larger sites, which lends support for a 75 home requirement.
Bodicote	75 home requirement	There is a clear case for allocating the one supported HELAA site through the LPR in order to avoid unnecessary delay. The Parish might then also be assigned a very small housing requirement.
Deddington	90 home requirement but has already been delivered.	There is no clear case for higher growth, i.e. a housing requirement that triggers a review of the recently made Neighbourhood Plan.
Hook Norton	75 home requirement	There could be a case for a lower housing requirement, given recent and committed growth in the Parish, plus accounting for village sensitivities and rurality. The Parish could still seek to exceed the requirement by allocating a larger site and ensuring it delivers to its full capacity to realise planning gain, e.g. in terms of affordable housing and infrastructure.
Launton	No new LPR growth	Strongly justified having accounted for the HELAA.
Steeple Aston & other Mid Cherwell Parishes	100 home requirement	This would appear broadly appropriate, given the HELAA, and given the Mid Cherwell Parishes may be able to identify additional site options.
Yarnton	No new LPR growth	Strongly justified including given the HELAA.
Category B villages	25 home requirement assigned to Milcombe (also see discussion above regarding Mid Cherwell)	Milcombe is suited to the lowest possible housing requirement, including on account of recent and committed growth. This could potentially be a figure lower than 25 homes, e.g. 10 homes.

## 5.5 Reasonable growth scenarios

### Introduction

- 5.5.1 Having gone through a process (see Figure 5.1) involving consideration of strategic factors (Section 5.2), site options (Section 5.3) and settlement scenarios (Section 5.4), the final task is to draw together the understanding generated in order to arrive at a single set of reasonable growth scenarios for appraisal and consultation (so as to discharge a central requirement of the SA process, as understood from Regulation 12(2) of the SEA Regulations, which is to appraise and consult upon “reasonable alternatives”).
- 5.5.2 In practice, this involves considering ways of combining the sub-area scenarios introduced above.

### Combining sub-area scenarios

- 5.5.3 A summary of the reasonable sub-area scenarios is presented in Table 5.7 (N.B. for the Kidlington sub-area, it is appropriate to differentiate between sites Green Belt, namely Kidlington and Shipton Quarry, and sites outside the Green Belt, namely East of Woodstock).
- 5.5.4 In summary, there is: one reasonable growth scenario for the Banbury sub-area, for the non-Green Belt part of the Kidlington sub-area, for Heyford Park and for the rural sub-area; and three reasonable growth scenarios for the Bicester sub-area and the Kidlington-area Green Belt.

5.5.5 There are nine feasible combinations of the sub-area scenarios introduced above 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 9 reasonable growth scenarios.

5.5.6 A final consideration is employment land, with options / scenarios discussed in Box 5.3. The conclusion of the discussion is that there is only one reasonable scenario at the current time.

**Table 5.7: Summary of the sub-area scenarios (N.B. LPR allocations only).**

Sub area		Scenarios
Banbury		One scenario: 770 homes
Bicester		<b>Three scenarios:</b> 0, 800 or 1,000 homes
Kidlington	Green Belt	<b>Three scenarios:</b> 0, 300 or 2,000 homes
	Non- Green Belt	One scenario: 450 homes
Heyford Park		One scenario: 0 homes
Rural area		One scenario: 565 homes
Total over-and-above completions, commitments and windfall	Minimum	1,785 homes
	Maximum	4,785 homes

**Table 5.8: The reasonable growth scenarios (with constants greyed-out and high growth indicated with blue text)**

Scenario			1	2	3	4	5	6	7	8	9
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	Green Belt	0	300	2,000	0	300	2,000	0	300	2,000
		Non-Green Belt	450	450	450	450	450	450	450	450	450
	Heyford Park		0	0	0	0	0	0	0	0	0
	Rural area		565	565	565	565	565	565	565	565	565
Total new homes			24,587	24,887	26,587	25,387	25,687	27,387	25,587	25,887	27,587
Per annum (pa) 2020-2042			1,118	1,185	1,266	1,209	1,223	1,304	1,218	1,233	1,314
% over the 911 dpa minimum housing requirement			23%	30%	39%	33%	34%	43%	34%	35%	44%

**Box 5.3: Employment land supply options / scenarios**

The proposed approach, as introduced across Section 5.4, is to allocate seven non-committed sites for a total of 97.5 ha of employment land, and in each case the proposal is for a flexible allocation for “Mixed Use B2, B8, and E(g)”. Specifically, the proposal is to allocate sites at: Banbury – two sites in the urban area for a total of 10.5 ha; and Bicester – five sites for a total of 87 ha, including three adjacent sites to the west along the A41.

This 97.5 ha ‘new supply’ figure broadly aligns with the ~100 ha residual need introduced in Box 5.1 (in Section 2). However, it is recognised that certain of the proposed allocations are associated with an element of delivery risk, namely the sites in the Banbury urban area and the site at Bicester adjacent to Graven Hill.

As such, there is a high level case for exploring growth scenarios involving additional allocation of land for employment. However, on the other hand, there is also a need to factor in a permissive criteria-based policy supportive of windfall sites, and one further consideration is that assumptions regarding the developable area within employment sites could potentially be adjusted upwards to boost supply. Currently the developable area assumptions assume a strongly ‘landscape-led’ approach, notably within the proposed Bicester ‘employment gateway’ south of Chesterton.

With regards to omission sites that come into contention, the first point to make is that two of the housing-led schemes that feature across the growth scenarios introduced above could well deliver notable or significant new employment land, namely Shipton Quarry and Wendlebury, but the reality is that there is very little certainty at this stage, i.e. there would be a need for further work to explore the concept for any new settlement etc. Both site promoters have suggested the potential to deliver around 7ha of employment land.

With regards to employment land omission sites, a first port of call is HELAA528 to the east of Bicester, which is supported by the HELAA. However, allocation would lead to a very high employment land supply at Bicester.

The next port of call is then the cluster of employment sites to the east of Banbury (east of the M40), which were given close consideration within Section 5.4 of the Interim SA Report (2023), at which time they were referred to as LPR57, LPR58 and LPR59. The report set out:

*“... there are clear landscape sensitivities, with the Landscape Study assigning ‘moderate-high’ landscape sensitivity, particularly mindful of the Overthorpe Ridge. Land to the south of the A422 might benefit from relatively good containment (as opposed to risking sprawl along the A361), but Nethercote is a hamlet / farmstead with a degree of historic character, plus there are clearly links to the nearby Overthorpe Conservation Area, on raised land to the east. The site promoters point to the potential to deliver a new road link between the A422 and the Overthorpe Road / M40 crossing [see Figure 5.13, above]. However, this potential road link should not be conflated with a southeast relief road. It is not clear the extent to which this new road link would deliver strategic benefit to Banbury (particularly in terms of relieving traffic along the Hennef Way), other than in terms of enabling employment growth east of the M40 whilst avoiding worsening the current situation. The Oxfordshire Local Transport and Connectivity Plan (2022) draws a distinction between the two road options.”*

Also, Section 6 of the Interim SA Report (2023) discussed a need to remain open to employment land growth at Banbury (N.B. it raised the possibility of warehousing need being footloose, but it is now accepted that the need figure discussed above is specific to Cherwell, with footloose needs relating more to very large scale warehouses). However, West Northamptonshire Council, then notably commented through the consultation in 2023: *“The Council has previously cautioned against proposals that would see the further allocation of land for employment near to Junctions 10 and 11 of the M40, which could have a significant impact on the highway network and the character and functioning of the area, with it and the south western corner of West Northamptonshire which it directly adjoins being rural in nature, character and appearance...”*

Following on from this, there is also the option of employment land growth at Junction 10 of the M40, to the east of Heyford Park, where there are currently speculative planning applications. However, this is not supported including for the reasons set out by West Northamptonshire Council. As discussed under the Heyford Park heading in Section 5.4, there is a need to ensure a long-term strategic approach to growth in this area, and the latest proposal for an expanded NW Bicester also feeds into this (also recent reports of a theme park proposal).

Finally, and as discussed in Section 5.4, there is a need to give ongoing consideration to further strategic employment growth (R&D sector) in the Kidlington area, but this is not considered to be an option for the LPR.

In **conclusion**, in light of this discussion there is not considered to be a reasonable need to further test employment omission sites through the appraisal of reasonable growth scenarios. The District is set to deliver a large amount of new employment land in the early years of the plan period, and then there will be the potential to revisit options for the latter years of the plan period through a plan review within five years.



## 6 Growth scenarios appraisal

### 6.1 Introduction

- 6.1.1 The aim of this section is to present an appraisal of the reasonable growth scenarios introduced above and further introduced in Table 6.1. To reiterate (see Section 4), these are the “reasonable alternatives”.
- 6.1.2 In summary, the scenarios vary in terms of four site allocations, which are considered to be those that are most marginal, on the basis of the process set out in Section 5.

**Table 6.1:** The reasonable growth scenarios – summary

Scenario <i>Completions, commitments, windfall, constant allocations plus allocation of...</i>		Total homes (2020-2042)	Homes per annum	Employment
1	N/a (constants only)	24,587	1,118	Whilst employment sites are held constant, Shipton Quarry and Wendlebury have the potential to deliver employment land.
2	North of the Moors, Kidlington ('Kidlington')	24,887	1,185	
3	Shipton Quarry	26,587	1,266	
4	SE Bicester *	25,387	1,209	
5	SE Bicester + Kidlington	25,687	1,223	
6	SE Bicester + Shipton Quarry	27,387	1,304	
7	Wendlebury	25,587	1,218	
8	Wendlebury + Kidlington	25,887	1,233	
9	Wendlebury + Shipton Quarry	27,587	1,314	

\* 'SE Bicester' comprises land the SE of the permitted Wretchwick Green strategic urban extension.

### 6.2 Appraisal methodology

- 6.2.1 The appraisal is presented under 12 headings – one for each of the topics that together comprise the SA framework – before a final section presents conclusions, including a summary appraisal matrix. Under each heading, the aim is to: **1)** rank the scenarios in order of performance (with a star indicating best performing); and then **2)** categorise the performance in terms of 'significant effects' using **red** / **amber** / **light green** / **green**.<sup>27</sup> Further points to note on methodology are as follows:
- Variable sites – are a primary focus of the appraisal here, although 'constant' sites are taken into account when reaching conclusions on significant effects. Constant sites are a focus of appraisal in Section 9.
  - Assumptions – there is a need to make a range of assumptions, e.g. around the nature of schemes that would come forward, infrastructure delivery etc. The appraisal aims to strike a balance between exploring and explaining assumptions on the one hand whilst, on the other hand, ensuring conciseness.
  - Site specific materials – typically submitted by site promoters, are taken into account with due caution, given a risk of bias and mindful that site-specific proposals are subject to change.

<sup>27</sup> **Red** indicates a significant negative effect; **amber** a negative effect of limited or uncertain significance; **light green** a positive effect of limited or uncertain significance; and **green** a significant positive effect. No colour indicates a neutral effect.





## 6.3 Air and wider environmental quality

1	2	3	4	5	6	7	8	9
Constants	Kidlington	Shipton Quarry	SE Bicester	SE Bicester, Kidlington	SE Bicester Shipton Quarry	Wendlebury	Wendlebury, Kidlington	Wendlebury, Shipton Quarry
2	1	1	1	1	1	1	1	1

- 6.3.1 **Banbury** is an air quality hotspot in the District, with a particularly problematic Air Quality Management Area (AQMA) along the A422 Hennef Way, which sees heavy traffic, as the main road linking to the M40 (albeit few if any sensitive receptors intersect the AQMA). However, the approach to growth at Banbury is held constraint across the reasonable growth scenarios. Banbury is discussed further in Section 9.
- 6.3.2 There is also an AQMA constraining the centre of **Bicester**, intersecting a number of properties and an important walking / cycling route, including in the vicinity of Bicester Community Hospital. Bicester is one of the three 'variables' across the growth scenarios, and so there is a need to carefully consider the air quality implications of higher growth (Scenarios 3 to 9).
- 6.3.3 Beginning with Wendlebury, growth here would lead to traffic through the AQMA, e.g. car journeys towards Milton Keynes. However, there is a need to factor-in good rail connectivity (including to Milton Keynes, following EWR), excellent access to the M40, the potential for good cycle connectivity and also the timing of development relative to the anticipated national switch-over to EVs.
- 6.3.4 With regards to SE Bicester (southeast of Wretchwick Green), the Transport Assessment (TA, 2022) is fairly supportive of growth here, ranking the site 'mid table' amongst the full suite of options considered (specifically, the allocations previously proposed at the Draft Plan stage; see the table on page iv of the report). The overall score in the TA is 11, which is not ideal, but the TA explains that "*A41 bus priority may assist future sustainable transport.*" Also, the current proposal is for the scheme to be separated from the committed scheme by a large local wildlife site, and for the new scheme to be split into two parts, separated by Blackthorn Hill, hence there would be a need to carefully consider the potential for all-weather walking / cycling through these green assets, e.g. to reach the local centre to the north.
- 6.3.5 Also, and importantly, higher growth at Bicester could facilitate delivery of a southern link road, which could (subject to further investigation) do much to address current issues of traffic congestion and air quality. The Wendlebury site in question might help to deliver the western sector of this road; however, it is important to be clear that any strategic growth locations at Bicester would likely be required to contribute to required strategic road infrastructure. If the road can be delivered then there would be good potential to reduce traffic along the A41 to the west of Bicester, potentially facilitating the road corridor to be reimagined as a public transport and walking / cycling corridor, linking growth / potential growth locations / Bicester P&R (which could develop into a 'transport hub') to Bicester Village and the town centre. However, the potential to achieve this aim is feasibly reduced now, relative to the Draft Plan stage, given the new proposal is to support a sole focus on employment land to the north of the A41 west of Bicester.
- 6.3.6 The other two sites that are a variable across the reasonable growth scenarios – **Kidlington** (North of the Moors) and **Shipton Quarry** – are associated with a range of transport-related issues and opportunities, but it is difficult to relate these to air quality objectives, with any confidence. Kidlington is in proximity to Oxford City, where there is an area-wide AQMA; however, it is not clear that proximity serves to indicate constraint over-and-above the other sites in question, recognising that Oxford is a sub-regional hub.
- 6.3.7 Having said this, Shipton Quarry is a location for growth that would represent a major departure from the existing strategy, and is not being factored in to ongoing work being led by the County Council, including the Central Oxfordshire Travel Plan. Also, there is a need to consider the possibility of Heyford Park coming back into consideration as a location for growth in the future, noting shared road corridors.

- 6.3.8 Finally, related to air quality, are matters relating to **environmental quality / health**. In this regard, it is fair to highlight noise pollution as a potential issue at Wendlebury, given the location of the site between the M40, the A41 and EWR, plus the site might be bisected by a link road (as discussed). However, the majority of the land directly adjacent to the M40 falls outside of the site red line boundary, as it is currently in use as a solar farm, and land adjacent to the railway is constrained by flood risk. Land closest to the M40/A41 junction might be well suited to employment, but this would be subject to viability.
- 6.3.9 In **conclusion**, none of the proposed allocations that feature across the growth scenarios give rise to a significant concern, either alone or in combination (also accounting for proposed allocations that are held constant across the growth scenarios, as discussed further in Section 9), and higher growth at Bicester could assist with delivering a new link road to reduce traffic through the town centre. As such, the order of preference reflects the fact that air quality is a significant issue in Oxford such that there is a case for the Cherwell Local Plan including flexibility for further unmet need from Oxford, should this be necessary. On the other hand though, it is recognised that support for a higher growth scenario could potentially result in a need to delay the LPR in order to allow time for further work (technical work on transport solutions, transport modelling and engagement with key partner organisations) which, in turn, would give rise to a risk of continued growth under the presumption in favour of sustainable development at locations that do not align well with transport objectives, and associated air quality objectives.
- 6.3.10 Matters are discussed further below, under 'Transport'.

## 6.4 Biodiversity

1	2	3	4	5	6	7	8	9
Constants	Kidlington	Shipton Quarry	SE Bicester	SE Bicester, Kidlington	SE Bicester Shipton Quarry	Wendlebury	Wendlebury, Kidlington	Wendlebury, Shipton Quarry
		3	2	2	4			3

- 6.4.1 Of the four sites that are a variable across the reasonable growth scenarios, it is **Shipton Quarry** that is subject to greatest biodiversity constraint, recognising that the entire central part of the site – specifically that part of the site that comprises the former quarry – is designated as a local wildlife site (LWS).
- 6.4.2 On the one hand, the habitats present presumably largely result from recent quarrying activities, as opposed to comprising semi-natural habitats that have developed as a result of many decades or centuries (potentially many centuries) of land use. This could serve to indicate relatively good potential to deliver extensive built form within the LWS – along with high quality green and blue infrastructure – without leading to major conflicts with strategic biodiversity objectives (given an assumption of carefully targeted compensatory habitat enhancement and creation, such that an overall biodiversity net gain is achieved in line with policy). However, on the other hand, the position of the LWS within the landscape could serve to indicate particular value and sensitivity. Specifically, there is a need to be mindful of the close association of the LWS with the River Cherwell corridor, and it is due to this close association that the LWS is identified as falling within a Conservation Target Area (CTA).
- 6.4.3 The site promoters point to the potential for development to deliver targeted biodiversity enhancements. However, there have been major changes to specific proposals over recent years, which serves to highlight the extent of the challenge. Specifically, whilst in 2020 the proposal was to retain the main area of existing ponds as a “primary nature conservation ‘bowl’”, by 2021 the proposal had evolved significantly, with an ‘ecology park’ proposed for land to the east of the railway line and adjacent to the River Cherwell (where the land is currently under arable cultivation, and subject to flood risk). There is clear merit to the idea of a biodiversity-focused country park to the east of the railway line, given the association of the land here with the Oxford Canal and a large meander of the River Cherwell. However, at this stage, it is far from clear that a suitably high net biodiversity gain could be achieved – as measured at a suitable landscape scale (e.g. at the scale of the River Cherwell corridor) – given the LWS constraint, and despite the proposal to deliver a well-targeted, biodiversity-focused new country park.





**Figure 6.3: Satellite imagery from 2006 (Google Earth)**



- 6.4.6 The next 'variable' site for consideration is **Wendlebury**, where the site promoters suggest a 2,850 home scheme, involving significant development to the east of the railway line to Oxford (see Figure 6.4), but the assumption here is that development would *not* extend beyond the railway line, primarily on account of flood risk and biodiversity constraints to the east.
- 6.4.7 Specifically, nearly all land to the east of the railway line falls within a fluvial flood risk zone, and much of the land is identified as floodplain grazing marsh priority habitat by the nationally available dataset (albeit there is no designated LWS, and satellite imagery shows some recent arable cultivation). The site promoters have previously proposed to address flood risk by "land raising and lowering", but there is a clear need to avoid flood risk in the first instance, as far as possible, in line with the sequential approach (discussed below). With regards to land lowering, it is recognised that this could support targeted wetland habitat creation, and also that the site promoters suggest the potential to achieve a 20% biodiversity net gain overall. However, there is no certainty regarding the potential for this strategy to prove successful, from a biodiversity perspective, and there is a need for caution given that land here is sensitive on account of its association with the Upper Ray Meadows Living Landscape, and noting that Wendlebury Meads and Mansmoor Closes SSSI is less than ~2km downstream. The land in question (i.e. the priority habitat east of the railway line) does not fall within a CTA, but it is identified by the Cherwell Green and Blue Infrastructure Strategy (2022) as falling within the Core Zone of the Oxfordshire Nature Recovery Network.
- 6.4.8 With regards to the assumed option of a ~1,000 home scheme to the west of the railway line (avoiding built development within the flood risk zone), this is thought to give rise to relatively limited concerns, from a biodiversity perspective, although there would still be a need to carefully consider hydrological linkages to the SSSI downstream. It is important to be clear that the entire Wendlebury Area falls within the extent of the Upper Ray Meadows and Bernwood Forest Living Landscape, within which the Wildlife Trust focuses its conservation efforts. The Living Landscape is discussed within the Green and Blue Infrastructure Strategy (2022), under the 'Otmoor, Bernwood and Ray' heading.
- 6.4.9 The next site for consideration is then **SE Bicester**, which is again sensitive on account of its proximity to the Upper Ray Meadows. In particular, there is a concern because a large LWS, comprising lowland meadows priority habitat (linked to a flood risk zone), lies between the committed urban extension and the new allocation option. It could be that development is able to deliver an enhancement (over-and-above what would occur under a baseline scenario), and an overall biodiversity net gain, but this is unclear at this stage, e.g. noting the likely need for transport infrastructure to pass through the LWS (albeit likely only in the form of an all-weather walking / cycling route). There is also a need to question the strategy of extending beyond Blackthorn Hill, given sensitive landscapes further to the southeast. However, the site promoter's vision for a series of linked green spaces is noted (see Figure 5.18, above).

**Figure 6.4:** Site promoter concept for Wendlebury (N.B. larger scheme than assumed here)



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

N.B. Kidlington is also in relative proximity to the internationally important Oxford Meadows Special Area of Conservation (SAC). However, the distance involved (~4km) serves to limit concerns around potential impact pathways. Matters were considered through the Habitats Regulations Assessment (HRA) in 2023.

- 6.4.11 Finally, there is a need to note the evidence provided by Berks, Bucks and Oxon Wildlife Trust through the consultation in 2023, specifically in respect of the two sites that were proposed for allocation at the and are now a variable across the growth scenarios, namely SE Bicester and Kidlington:

- SE Bicester – “We are very greatly concerned by this site allocation and object to it being taken forward. It takes Bicester even further eastwards towards the Upper Ray CTA and the large assemblage of protected sites, species, and BBOWT reserves in that area, protecting highly vulnerable lowland meadow, and bird breeding sites. We consider this further extension presents a considerable risk to the CTA, and the protected sites, through increased recreational impact, hydrological impact, air pollution, and ecological isolation, and from the impacts of urbanisation on rare species such as the curlew and other species. Also, the site includes Meadows NW of Blackthorn Hill Local Wildlife Site within it and even if the LWS is entirely excluded from development and managed for wildlife the likely impact of being surrounded by development on both sides is of great concern.”
- Kidlington – “We are greatly concerned by this site allocation and object to it being taken forward. It takes Kidlington even further towards the Lower Cherwell Valley CTA and directly into the NRN Recovery Zone. We consider this extension to Kidlington presents a considerable risk to the wildlife of the CTA, the river valley, and the protected sites, through increased recreational impact, hydrological impact, air pollution, and ecological isolation, and from the impacts of urbanisation on species that are not adapted to tolerate such urbanisation. We therefore object to this allocation.”

6.4.12 In **conclusion**, a first point to make is that under this heading (in contrast to the discussion under Air quality), 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. Focusing on Shipton Quarry, the site is closely associated with the River Cherwell corridor – which is a conservation priority area – which serves to indicate a degree of sensitivity, albeit also potentially opportunity. There is also a potential concern regarding Wendlebury, on account of the close association of land here with the Upper Ray Meadows broad landscape, which is another conservation priority area of sub-regional and potentially wider importance (in combination with the Bernwood Forest, to the south); however, concerns are considered quite limited, on the assumption of a scheme that is far more modest in scale than that currently proposed by the site promoter. Kidlington is considered to be the least constrained site, notwithstanding the concerns raised by BBOWT in 2023.

## 6.5 Climate change adaptation

1	2	3	4	5	6	7	8	9
Constants	Kidlington	Shipton Quarry	SE Bicester	SE Bicester, Kidlington	SE Bicester Shipton Quarry	Wendlebury	Wendlebury, Kidlington	Wendlebury, Shipton Quarry
★1	★1	★1	★1	★1	★1	2	2	2

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

6.5.2 Three of the variable sites are subject to limited constraint, namely:

- **Kidlington** (North of the Moors) – is closely associated with the River Cherwell corridor, but the firm proposal is to retain a Green Belt buffer between the site and the fluvial flood risk zone. The fluvial flood zone intersects the eastern extent of the site; however, there is a strong argument for delivering green / blue infrastructure within this part of the site in any case, to address historic environment constraint.
- **SE Bicester** – there is some surface water flood risk either side of Blackthorn Hill, where new homes are proposed. However, the permitted site to the north provides a good example of how surface water flood risk can often be sufficiently addressed at the development management stage, noting that the site intersects surface water flood zones to a significant extent (see masterplan in Section 5).
- **Shipton Quarry** – the nationally available datasets showing fluvial and surface water flood risk serve to indicate limited constraint, and the site promoters commented through the consultation in 2023: *“Detailed work has been undertaken on the proposed development at The Shiptons that demonstrates that the site does not flood. Part of the site is within the flood plain and would be subject to flooding, but this area is part of the new Country Park and will not accommodate vulnerable uses.”* However, ongoing scrutiny is warranted given the inherent characteristics of the site, namely significantly lowered land (i.e. a quarry) adjacent to the River Cherwell.

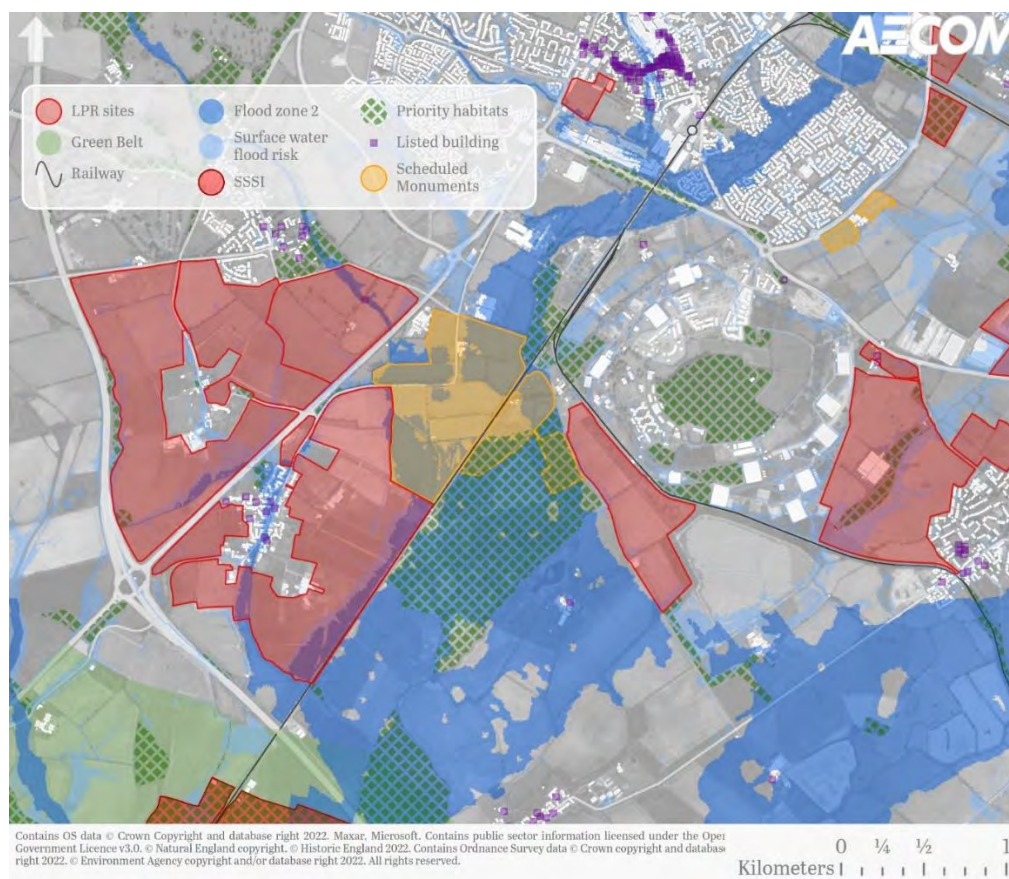
6.5.3 However, **Wendlebury** (Bicester) is heavily constrained by flood risk, given the close association of land to the southwest of Bicester with the extensive floodplains of the Upper Ray Meadows, which is a recognised landscape area, of at least sub-regional significance, as discussed above under ‘Biodiversity’.



6.5.4 The assumption here, for the purposes of exploring reasonable growth scenarios (through appraisal and consultation) is that built form (particularly residential) would avoid fluvial flood risk zones, in line with the nationally required sequential approach to avoiding flood risk, hence the assumption is a ~1,000 home scheme as opposed to the 2,850 homes scheme proposed by the site promoters. However, even a ~1,000 home scheme would likely be constrained on account of flood risk (subject to further investigation), noting: A) land to the east of Wendlebury is bounded on all sides by fluvial flood risk zones, such that there is a need to consider the potential for safe access and egress during a major flooding event, albeit it is recognised that the flood zone to the north is very narrow; and B) the surface water flood zone extends notably beyond the fluvial flood zone in the vicinity of the railway line. There are three further points to make, regarding links between flood risk and development options in this area:

- Wendlebury itself is significantly affected by a fluvial flood risk channel, with numerous homes intersecting the flood risk zone. The site promoters propose to proactively address this, by delivering a 'flood bypass' of the existing village, which is potentially a significant opportunity for 'planning gain'. However, this proposal is made in the context of a proposed 2,850 home scheme (to include extensive development within the existing fluvial flood risk zone), hence it will be for the site promoters to confirm that the flood bypass could be delivered as part of a more modest scheme, e.g. ~1,000 homes.
- With regards to existing flood risk affecting Wendlebury, there is also a need to consider planned and potential upstream development north of the A41 (as discussed in Section 5). All of the land here drains to Wendlebury, specifically two recognised streams and two further surface water flood channels (i.e. all four channels converge at Wendlebury), hence there is a need for caution, albeit there could also be the potential for development north of the A41 to deliver a betterment, in terms downstream flood risk affecting Wendlebury. Indeed, this is understood to be a matter that was a focus of the planning application process for the recently permitted strategic employment scheme.
- In general, the flood risk 'picture' is quite complicated in the vicinity of the A41 corridor southwest of Bicester, and Bicester as a whole, because this is low lying land associated with a high density of tributaries of the River Ray (including several that converge at Wendlebury). The situation is not helped by the fact that only one tributary is named on the OS map, namely the Gagle Brook. This is potentially a barrier to strategic planning for growth alongside flood risk management / climate change resilience. Figure 6.5 aims to present an overview of the flood risk picture affecting Bicester.

**Figure 6.5: Select constraints to growth in the south west Bicester area**





6.5.5 Finally, the site promoters commented as follows through the consultation in 2023:

*“Flood risk at the site is defined by Environment Agency flood modelling. The model has been reviewed and refined with detailed site survey inputs and adjustments for appropriate climate change. The model has been used to develop a sustainable flood mitigation strategy that facilitates developable areas in the south of the scheme with no increase flood risk to third party land. Further the mitigation strategy reduces the existing flood risk to the wider Wendlebury settlement by accommodating a flood bypass channel conveying flood waters from the village into the proposed onsite flood mitigation areas.”*

6.5.6 In **conclusion**, 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. There are also question-marks regarding flood risk at Shipton Quarry, which would require further investigation. With regards to significant effects, it is considered appropriate to predict moderate or uncertain negative effects only for the worst performing scenarios. Canalside at Banbury is a constant across the growth scenarios (and so is a focus of discussion in Section 9), and is affected by significant flood risk, but this has been explored in detail through a Level 2 Strategic Flood Risk Assessment (SFRA) in line with the expectations of the Environment Agency (as set out in the consultation response received in 2023, which did not object to any sites on flood risk grounds).

## 6.6 Climate change mitigation

1	2	3	4	5	6	7	8	9
Constants	Kidlington	Shipton Quarry	SE Bicester	SE Bicester, Kidlington	SE Bicester Shipton Quarry	Wendlebury	Wendlebury, Kidlington	Wendlebury, Shipton Quarry
=	=	=	=	=	=	=	=	=

6.6.1 The scope of discussion here focuses on per capita greenhouse gas emissions from the **built environment**, with alignment of the reasonable growth scenarios with strategic transport objectives a focus of discussion under other topic headings.

6.6.2 A detailed discussion of the potential for the LPR to support strategic objectives around minimising per capita built environment greenhouse gas emissions and, in turn, support rates of decarbonisation in line with district, county and national net zero carbon targets, is presented in Section 9.

6.6.3 The focus of discussion here is in respect of the potential for each of the reasonable growth scenarios to support a focus of growth at strategic-scale scale schemes, and to support higher density mixed use communities, with a view to minimising per capita built environment emissions. Another important consideration is directing growth to locations where there might be development viability ‘headroom’ supportive of delivering net zero carbon development to an exacting standard (meaning with net zero achieved in line with the energy hierarchy, to include without resorting to offsetting, i.e. ‘onsite’ net zero).



6.6.4 In this respect, **Shipton Quarry** *potentially* performs well, as a location for growth, relative to the other three site options that are a variable across the growth scenarios. This is on account of the scale of the proposed scheme (the site promoters suggest 2,500, with the potential for a further phase of 2,500, but the assumption here is simply ~2,000 homes). There is also *some* potential for a nucleated built form, specifically within the eastern part of the site (see Figure 6.2), where the new community would be somewhat centred on a local centre and train station, where there might be potential for higher densities (and land levels may support this). Also, it is noted that an employment area is proposed near adjacent to the eastern residential area, which could lead to an opportunity to balance demand for heat and power across the day. Finally, it is worth noting that the potential for hydropower could feasibly be explored.

- 6.6.5 However, the latest proposal is for a scheme that is less nucleated than that previously proposed in 2020 (Figure 6.2), plus the built form could become less-nucleated-still, were the proposed second phase to eventually come forward, to the west of the A4260. Also, there is a need to consider the possibility of abnormal development costs impacting on the availability of funds to direct towards planning for net zero development, i.e. given the costs involved with energy infrastructure and high efficiency standards.
- 6.6.6 It is also helpful and appropriate to review materials received from the site promoter, including with a view to building an understanding of their commitment to directing limited funds to built environment decarbonisation focused measures (i.e. in a way that maintains overall development viability), albeit site specific proposals are naturally subject to change (including in response to national and local policy).
- 6.6.7 With regards to the promotional document received from the site promoters, it is notable for dedicating four of the first five sections to a high level discussion of climate change policy, but then subsequently providing very little detail regarding the merits of the site (most importantly) or the specific proposed scheme (which is subject to change), from a built environment decarbonisation perspective.
- 6.6.8 In particular, there is very little information provided to evidence a conclusion that supporting growth at Shipton Quarry would lead to an opportunity over-and-above other competing strategic growth locations (N.B. it is recognised that the site is associated with a strategic transport opportunity, namely a new train station). Rather, the document primarily presents high level statements that could apply to any strategic site, for example: *“A new energy centre is located centrally which will be used to help power activity...”* It is recognised that this is a fast moving policy area, such that there is a need to ‘future proof’ proposals, but there is nonetheless a need to take a proactive strategic approach. The other main commitment is very high level: *“The intention is to create a truly sustainable eco-community with low carbon... buildings designed to a highly insulated ‘fabric first’ approach supplemented with renewable energy options and network energy systems... This would work in conjunction with the wider sustainable measures of sustainable travel, ecological enhancements, sustainable drainage, and potential carbon sequestration.”*
- 6.6.9 The next site for consideration is **Wendlebury**, where the site promoters have proposed a 2,850 home scheme, but the current assumption is delivery of ~1,000 homes. The promotional material received through the Options consultation (2021) does include a clear commitment to net zero development, with a helpful distinction made between operational / in use emissions and non-operational emissions (e.g. embodied emissions in building materials). However, the terminology / commitments are not defined with any precision, which leaves them open to interpretation (see further discussion in Section 9), and leaves open the potential for confusion (and even ‘greenwash’). Beyond this, the promotional material does not present any built environment decarbonisation-related masterplanning proposals (e.g. ground solar linking to large scale battery storage, e.g. within ‘energy centres’), which could be necessary to enable net zero development, albeit there will likely also be a major role for smaller scale battery storage to balance power supply and demand, including EV batteries. However, the possibility of a Modern Methods of Construction (MMC) facility at the site has been suggested, with a view to delivering ‘offsite construction’ of homes (likely to include ‘modular’ construction) not only for Wendlebury, but also for other development sites in the sub-region. This is a considerable opportunity, as there is an urgent need nationally to support MMC.<sup>28</sup> However, it is unclear whether the facility would remain a viable option under a ~1,000 home scenario.
- 6.6.10 In the case of **SE Bicester**, the proposal is for the scheme to be split into two distinct parts, either side of Blackthorn Hill, and the smaller eastern part is proposed to form a ‘linear village’, which might be questioned from a decarbonisation perspective. Also, there is an understood need for considerable investment in infrastructure (including transport and green infrastructure), such that it would be important to confirm funding available for decarbonisation measures. Finally, it is noted that the “Towards a net zero carbon community” section within the submitted vision document (September 2021; N.B. pre-dating the emerging plan policies) does not discuss built environment emissions.

<sup>28</sup> For example, a recent “net zero whole life carbon roadmap for the built environment” prepared by the UK Green Building Council’s (UKGBC) concludes the following under the banner of ‘non-operational’ emissions: *“Embodied carbon emissions make up approximately 50% of building lifecycle emissions, yet are currently unregulated, and measurement and mitigation within design and construction is entirely voluntary. Solving the issue is both a demand and supply issue...”*

- 6.6.11 The final variable site option is **Kidlington** (North of the Moors), which is a smaller site (~300 homes). This is a site that is not likely to be associated with any abnormal development costs (although there are some uncertainties around access), and development viability is relatively strong at Kidlington, so there is every potential to bring forward development in line with district-wide policy on built environment decarbonisation (see Section 9). However, the size of the site – also mindful of its somewhat linear shape, and a potential need for modest densities, at least in part, given constraints – could feasibly mean that the built environment decarbonisation opportunity is lower than is the case for the sites discussed above.
- 6.6.12 In **conclusion**, 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 greenhouse gas emissions. As part of this, development viability could be factored-in (which varies significantly across the County).
- 6.6.13 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.

## 6.7 Communities

1	2	3	4	5	6	7	8	9
Constants	Kidlington	Shipton Quarry	SE Bicester	SE Bicester, Kidlington	SE Bicester Shipton Quarry	Wendlebury	Wendlebury, Kidlington	Wendlebury, Shipton Quarry
 1	2	2	 1	2	2	2	2	2

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

- 6.7.5 Moving on to **Wendlebury**, there is a need to recall the current assumption of a ~1,000 home scheme, in contrast to the much larger scheme proposed by the site promoters. A primary consideration here is potentially impacts to Wendlebury, which is a historic parish. Development would wrap around the existing community, and so clearly lead to impacts, albeit there would be the potential for mitigation, and there would be the potential to deliver significant new infrastructure to the benefit of the existing community, e.g. a primary school and improved road and cycle connectivity. Also, there may be an opportunity to address the flood risk that currently affects the village, as discussed. Other wider considerations are then in respect of the potential to deliver comprehensive western expansion of Bicester, as far as the M40 and flood risk zones, via growth at Wendlebury in-combination with growth to the north of the A41, including with a long term aspiration to transform transport connectivity / support modal shift, as discussed above.
- 6.7.6 The next site for consideration is **SE Bicester**. The proposal here has certain merit, from a 'communities' perspective, particularly in terms of the proposal to increase access to Blackthorn Hill, as a new area of accessible parkland (potentially assisting in terms of building an appreciation of Bicester in its landscape setting, and therefore supporting local 'sense of place'). Also, there could be benefit associated with improved walking/cycling connectivity between Ambrosden and Launton (the current bridleway passes along Blackthorn Hill, but then hits something of a dead-end, in the form of a road with no footpath).
- 6.7.7 However, the furthest point of the proposed site (east of Blackthorn Hill), would be ~3.5km from the centre of Bicester 'as the crow flies', and there are barriers to movement (albeit potential for good bus connectivity). Also, the local centre within the committed adjacent SE Bicester urban extension would be approaching 1.5km distant, and there are barriers to movement, in the form of employment land, Blackthorn Hill and a local wildlife site (LWS; in turn, a related consideration is the potential to deliver an all-weather walking / cycling route through the LWS). The distance from the further point of the proposed eastern 'linear village' (according to the site promoter's vision document received in 2021) to the local centre would be considerably further than 1.5km via an all-weather route (i.e. avoiding crossing the hill).
- 6.7.8 The final site in question is **Kidlington** (North of the Moors), where the equivalent appraisal in 2023 suggested *"fairly limited communities-related issues and opportunities, as a smaller site that would form a fairly modest extension to a higher order settlement."* However, latest understanding is that the proposed allocation did generate significant levels of local concern through the consultation in 2023.
- 6.7.9 The site benefits from good proximity to the centre of Kidlington, and the proposal is to deliver significant new green space (e.g. a village green and/or a cricket pitch, subject to further investigation). There is a need to consider the public footpaths passing through / adjacent to the site, as well as road access (the Moors is a link road, between main road, shown by the Transport Assessment (2022) to experience significant peak time traffic), but no particular issues are envisaged at this stage. There are also considerations around meeting local housing needs, as discussed further below.

**Figure 6.6: Proposed green infrastructure at North of the Moors, Kidlington**

The plan opposite summarises the green and blue infrastructure potential of the site. It is based on an extensive evidence base and substantial engineering input and has been used as a base line to underpin the emerging Master Plan. This plan can be used to inform and complement Policy LPR8A of the emerging Cherwell Local Plan 2040.

- Existing PRoWs
- Active Travel Routes Connecting into Existing PRoWs
- Vehicular, Pedestrian and Cycle Access
- Retained and Enhanced Existing Green Infrastructure
- Woodland and Hedgerow Planting
- Primary SUDS Zones and Wetlands
- Swales
- Recreational Green Space
- Heritage Orchards (Cemetery Extension)
- Multi-functional Green Space
- Flood Zone 2
- Flood Zone 3
- TPO Trees and Groups
- Conservation Area
- Accessible Green Space





- 6.7.10 Aside from access to community infrastructure, a related consideration is access to **green / blue infrastructure**, including high quality countryside. In this respect: Shipton Quarry and Kidlington are both considered to perform well, particularly given their association with the River Cherwell and canal corridor; and at both SE Bicester and Wendlebury there is reasonable access to the expansive landscapes of the Upper Ray Meadows via public rights of way. Focusing on Wendlebury, there is a bridleway that links to Otmoor (albeit at a distance and via the M4 junction); however, there is a concern regarding impacts to route 51 of the National Cycle Network (NCN), which currently links expanding Bicester Garden Town to high quality countryside to the west, via quiet rural lanes and the historic village of Wendlebury, where there is a historic and presumably popular public house.
- 6.7.11 In **conclusion**, all or most of the variable sites could deliver significant new community infrastructure alongside new homes, which is a key consideration. 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 (and, perhaps most notably, there would be significant local concerns around attempting to argue exceptional circumstances for Green Belt release given the evolved strategic context since 2023). Also, SE Bicester was previously an allocation and generated relatively low levels of concern locally.
- 6.7.12 With regards to significant effects, there is a need to consider the package of allocations that are a constant across the reasonable growth scenarios, as discussed in Section 5 and Section 9. These sites are associated with a range of communities-related issues / opportunities, which informs an overall conclusion of neutral effects across all growth scenarios.

## 6.8 Employment & economic growth

1	2	3	4	5	6	7	8	9
Constants	Kidlington	Shipton Quarry	SE Bicester	SE Bicester, Kidlington	SE Bicester Shipton Quarry	Wendlebury	Wendlebury, Kidlington	Wendlebury, Shipton Quarry
=	=	=	=	=	=	=	=	=

- 6.8.1 As discussed in Section 5.5, there is a case for remaining open to additional employment land supply:
- **Shipton Quarry** – could deliver significant new employment land of note (Figures 6.1 and 6.2). There is no identified need to support new employment land in this area, but there could be merit to delivering employment land as part of a new settlement, and new employment here would be quite closely linked to the existing and growing strategic employment hub at Kidlington / Begbroke / Oxford City Airport (located only ~2km to the south), such that there could be an argument for extending the Oxfordshire Knowledge Spine spatial concept to the north, to include a new settlement at Shipton Quarry. There could also be merit to employment land closely linked to Woodstock.
  - **Wendlebury** – the site promoters currently suggest the potential for 7ha (albeit in the context of 2,850 home allocation), which would be quite well located, close to the M40 / A41 junction. Furthermore, development at Wendlebury could be supportive – and potentially quite strongly supportive – of long term aspirations for delivering transport and connectivity improvements at Bicester, which is a significant consideration from a perspective of seeking to ensure the town is able to realise its potential as a focal point for employment / economic growth at the junction of the Oxfordshire Knowledge Spine and the Oxford to Cambridge Arc. The possibility of a delivering a Modern Methods of Construction (MMC) facility has also been discussed (albeit in the context of 2,850 home allocation), which could be supportive of sub-regional growth objectives.
- 6.8.2 With regards to **SE Bicester**, the proposal is not to deliver employment land, but the site would benefit from a location adjacent to new employment land. Having said this, job densities at the employment land are likely to be quite low, in contrast to at Wendlebury, where the recently permitted Siemens scheme near adjacent (north of the A41) is set to create “*up to 1,200 skilled jobs... when the facility is fully operational*”.

- 6.8.3 Finally, with regards to **Kidlington**, whilst the site would not deliver new employment land, there is a need to consider that the site is located within walking / easy cycle distance of a major employment land hub.
- 6.8.4 In **conclusion**, 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. There is a need to provide for employment land needs both in order to support the realisation of strategic economic growth and productivity objectives and also with a view to collocating jobs and homes in order to avoid problematic commuting patterns (including from a decarbonisation perspective).
- 6.8.5 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 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.
- 6.8.6 There is 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. Equally, there is a case for not moving too fast too soon, e.g. the Kidlington area has extensive committed growth which might be allowed time to progress / deliver before considering further growth with a long term perspective, potentially via a sub-regional plan.

## 6.9 Historic environment

1	2	3	4	5	6	7	8	9
Constants	Kidlington	Shipton Quarry	SE Bicester	SE Bicester, Kidlington	SE Bicester Shipton Quarry	Wendlebury	Wendlebury, Kidlington	Wendlebury, Shipton Quarry
★1	2	2	★1	2	2	2	2	2

- 6.9.1 **Kidlington** (North of the Moors) – stands out as potentially subject to the highest degree of constraint, despite being a smaller site (~300 homes), on account of the adjacent Kidlington Conservation Area, which includes a prominent Grade I listed church and a high density of Grade II listed buildings.
- 6.9.2 There is also a need to account for the historic footpath that runs adjacent to the site, linking the conservation area to the Oxford Canal (and specifically a listed bridge), via a listed bridge over the railway. However, the firm proposal is to avoid or suitably mitigate impacts by delivering a large area of open space at the eastern extent of the scheme, as a buffer to the conservation area. Also, the proposal is that growth will not extend beyond the railway and so not encroach on the Oxford Canal. It is also important to note that the eastern extent of the Moors is associated with a degree of historic character, with two Grade II listed buildings, including one that would be near adjacent to the likely new access junction for the development site, and is associated with a series of trees with TPO designation.
- 6.9.3 There is also understood to be some archaeologic sensitivity, for example the consultation response received from Oxfordshire County Council in 2023 explaining that the site “is located in an area of archaeological interest related to Iron Age, Roman and medieval settlement.” However, this was not one of the proposed allocations for which the OCC response concluded “considerable” archaeological interest.
- 6.9.4 **Shipton Quarry** is likely the next most constrained of the variable site options, given a close association with the River Cherwell corridor, which is a landscape strongly associated with historic settlement, and its position adjacent to the Oxford Canal Conservation Area. In particular, the cluster of villages to the immediately to the south (Shipton-on-Cherwell, Hampton Gay and Thrupp) is associated with a blanket conservation area, and a notable feature is two churches in close proximity, on either side of the river (although one of the churches is only Grade II listed, e.g. contrast to Kidlington). Also, at Enslow, to the north, the Oxford Canal Conservation broadens-out, to take in an area historically associated with a mill, a wharf and a former railway station.

- 6.9.5 Finally, it is important to note that there is a small scheduled monument (a long barrow) within the greenfield part of the site located to the northwest of the quarry. The feature is below ground (the field in question is under arable cultivation, and the outline of the archaeological feature is barely visible on historic satellite imagery, if at all), but it is an important constraint. In this light, it is concerning that it is not highlighted or mentioned as a constraint within the promotional materials that have been provided to date.
- 6.9.6 The remaining two variable growth locations are then subject to less constraint.
- 6.9.7 Beginning with **Wendlebury**, there is no designated conservation area and nine Grade II listed buildings within the village (including the parish church, which is located near-adjacent to the A41) does not amount to a high density. Nonetheless the village has a clear historic character that is likely valued by the residents of an expanding Bicester Garden Village. Another important consideration is the location of an extensive scheduled monument adjacent to the north of the site, which is the site of the Roman settlement of Alchester (considerable detail / indicative detail is shown on [historic mapping](#)). The site promoters discuss the potential to support access to / appreciation of the scheduled monument, which is supported; however, it could well be the case that there is high archaeological sensitivity within the site, linked to the scheduled monument. Also, there is also a need to consider the impacts of a possible new southern Bicester link road (albeit there is a likelihood of the link road continuing to be considered as an option regardless of development). This might follow the route of the lane located to the south of the bulk of the scheduled monument, which is clearly less sensitive than the lane to the north (which the promoters suggest could be downgraded to a cycle / pedestrian route); however, there is still a potential concern.
- 6.9.8 Finally, with regards to **SE Bicester**, Blackthorn Hill is associated with a Grade II listed windmill (and also a second windmill); however, the proposal is to enhance access to Blackthorn Hill, and the potential for enhanced appreciation of the listed windmill can be envisaged (see Figure 5.18). Historic England commented through the consultation in 2023: “... we note the mill lost its sails many years ago, arguably reducing the contribution of an open rural setting to its significance.”
- 6.9.9 In **conclusion**, 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.





## 6.10 Homes

1	2	3	4	5	6	7	8	9
Constants	Kidlington	Shipton Quarry	SE Bicester	SE Bicester, Kidlington	SE Bicester Shipton Quarry	Wendlebury	Wendlebury, Kidlington	Wendlebury, Shipton Quarry
9	8	7	6	5	4	3	2	1 

- 6.10.1 The order of preference reflects the conclusion, as set out in Section 5.2, that there are a range of arguments for **higher growth**, which might be summarised as: A) affordable housing needs; B) potentially case for growth ambitions linked to economic development; and C) residual uncertainties around unmet need. Also, there is a need to note the Government's draft new standard method figure for the District, which is 38% higher than the existing figure that is the basis for the current plan, and another consideration is high rates of recent housing delivery (although delivery rates have recently decreased significantly).
- 6.10.2 These factors suggest that it is appropriate to rank the performance of the scenarios in order of total growth quantum, but one other factor is that Wendlebury and Kidlington would likely be able to deliver earlier in the plan period than is the case for SE Bicester and Shipton Quarry.

- 6.10.3 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 large (23%) 'supply buffer' over-and-above the requirement as a contingency for delivery issues, which is an important factor given known delivery challenges.
- 6.10.4 Also, under Scenario 1 it is understood that the housing requirement would be set in line with the established need figure from the start of the plan period, as opposed to an upward stepped requirement to reflect delivery challenges / limited supply able to deliver in the early years of the plan period. This is positive, although it is noted that supply is only marginally above the housing requirement across the early years of the plan period (such that there is potentially a case to be made for a stepped requirement). That said, it is not thought likely that any of the variable growth locations would be able to boost supply in the early years of the plan period (in order to provide comfort in respect of maintaining a five year housing land supply as measured against the housing requirement).
- 6.10.5 Finally, with regards to site-specific considerations, Kidlington is of note as a medium sized site not thought likely to be associated with issues that could delay delivery or lead to arguments for reduced affordable housing (albeit there are some uncertainties around achieving good access). Also, Kidlington benefits from proximity to Oxford and is associated with relatively low recent and committed housing growth, as a proportion of dwelling stock, relative to Banbury and Bicester, which could have a bearing on relatively high house prices (also, anecdotal evidence suggests a prevalence of properties being sub-divided), albeit there is high committed growth in the wider sub-area.
- 6.10.6 A final consideration is around delivering specialist accommodation, which is an argument in favour of larger-scale sites (and so potentially an argument against Kidlington). Focusing on providing for Gypsy and Traveller accommodation needs, as discussed in Section 5.2 there is no established need to allocate any new land for pitches in the District, but the situation is potentially subject to change, and larger-scale strategic sites can be well-placed to deliver new pitches.
- 6.10.7 In **conclusion**, the alternatives are ranked in order of total growth quantum with an adjustment made to favour sites likely (or potentially) able to deliver earlier in the plan period. With regards to significant effects, whilst there are a range of uncertainties even the lowest growth scenario is considered to perform well in an absolute sense, as the housing requirement would be set in line with established housing need (across the entire plan period) and supply would significantly exceed the housing requirement over the course of the plan period as a contingency for delivery issues ('supply buffer').

## 6.11 Land, soils and resources

1	2	3	4	5	6	7	8	9
Constants	Kidlington	Shipton Quarry	SE Bicester	SE Bicester, Kidlington	SE Bicester Shipton Quarry	Wendlebury	Wendlebury, Kidlington	Wendlebury, Shipton Quarry
 1	2	 1	2	3	2	 1	2	 1

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





- **Shipton Quarry** – is obviously partly degraded land, namely a former quarry, but the proposal is also to develop significant areas of agricultural land to the north, south and east of the quarry. The national dataset shows Grade 3 quality land in this area, although there is also a notable band of Grade 4 quality land (i.e. land that is not likely to be BMV in practice) following the river corridor.
- **SE Bicester** – the adjacent committed site to the west has been surveyed in detail and found to comprise Grade 3b quality land, but that the nationally available dataset shows a band of better quality (provisionally Grade 2 quality) land associated with Blackthorn Hill.
- **Wendlebury** – is strongly associated with an area of land that the national dataset shows to be Grade 4 quality, such that it is not likely to comprise BMV agricultural land in practice.

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

- 6.11.3 Maintaining a focus on agricultural land, it is also noted that Natural England did not make any comments regarding spatial strategy or site selection through the consultation in 2023, but did recommend: *"To support plan allocations... sites (over 5ha agricultural land) should have a site-specific Soils Management Plan informed by a detailed Agricultural Land Classification (ALC) and soil resource survey..."*
- 6.11.4 A further consideration is the need to avoid sterilisation of minerals resources that could potentially be viably extracted, as understood from the policies map of the Oxfordshire Minerals and Waste Local Plan (2017). However, it is not clear that this is a significant issue at any of the sites in question, and it is also important to note that safeguarding is not absolute, as explained by the Minerals Safeguarding Practice Guidance (Mineral Products Association, 2019): *"Allocation of sites for non-minerals development within MSAs and proximate to safeguarded minerals infrastructure sites should be avoided where possible... However, safeguarding is not absolute. Where other considerations indicate..."*
- 6.11.5 In **conclusion**, Wendlebury is shown by the nationally available low resolution dataset to comprise lower quality agricultural land, and there is 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. With regards to growth quantum, it is not possible to suggest that lower growth is preferable, as Cherwell District does not stand-out as relatively constrained in the sub-regional context. For example, South Oxfordshire has a notably higher coverage of land shown to be Grade 2 quality by the national dataset.

## 6.12 Landscape

1	2	3	4	5	6	7	8	9
Constants	Kidlington	Shipton Quarry	SE Bicester	SE Bicester, Kidlington	SE Bicester Shipton Quarry	Wendlebury	Wendlebury, Kidlington	Wendlebury, Shipton Quarry
 1	2	2	2	2	2	 1	2	2

- 6.12.1 Beginning with the site that is arguably the most sensitive, namely **Kidlington** (North of the Moors), an immediate point to note is that the site is located within the Oxford Green Belt. However, the Green Belt Study (2022) identifies the site as making only a 'moderate' contribution to Green Belt purposes. The Landscape Study (2022) did not assess the site, but it has subsequently been the focus of an assessment, which draws an important distinction between the eastern part of the site (currently a well-defined urban edge, overall high sensitivity) and land to the west (*"The settlement edges are generally weakly defined... which lessens the sense of rurality and tranquillity. Residential development would fit with the character of the adjacent settlement edge..."*; overall moderate sensitivity). In this regard it is important to note the proposed layout (Figure 6.6), but some concerns do remain (linked to historic environment sensitivity). There is also a need to note the footpaths passing through and adjacent to the site, which are likely to be quite popular walking routes, and also mindful of the adjacent Kidlington Conservation Area.

- 6.12.2 On the other hand, the site benefits from strong containment, in landscape terms, on the assumption that there would not be further development 'creep' to the north or west, i.e. a long term defensible Green Belt buffer would be maintained to the River Cherwell / Oxford Canal corridor. It could be suggested that the effect of development would be to increase the close association of Kidlington with the River Cherwell, albeit the village was historically associated with a transport corridor following slightly raised ground between the River Cherwell and the Rowel Brook corridors. A final point to note is that the land does rise slightly, within the site, away from the settlement boundary.
- 6.12.3 **Shipton Quarry** is then the next site for consideration, mindful that the quarry and land to the east and south falls within the Oxford Green Belt, with only the proposed land parcel to the northwest falling outside of the Green Belt. There is likely to be some capacity in Green Belt terms, including mindful of the location of the site at the very edge of the Green Belt, and the Landscape Study assigns the site 'low-medium' sensitivity (with the assumption that the scheme would extend beyond the quarry). There is also good potential for effective containment in most directions, namely containment provided by the River Cherwell / Oxford Canal corridor to the south and east, and a notable hill (Whitehill) to the north (also a thick hedgerow / tree belt). However, there is a concern regarding development creep / sprawl to the west of the A4260, with the site promoters suggesting that a further 2,500 homes could be delivered here in the future. It is commendable for the site promoters to be open about their long term aspirations; however, there would be a concern regarding the potential for effective containment of growth within a relatively flat and featureless landscape, given the location of Woodstock to the west, albeit there would be some potential to draw on topography to form a defensible long term boundary, ensuring that any new settlement remains firmly associated with the Cherwell valley / corridor.
- 6.12.4 Moving on to **SE Bicester**, whilst Bicester is generally associated with lower landscape sensitivity, there is significant variation around the perimeter of the town. In this context, the SE Bicester is associated with notable landscape sensitivity, given its relationship to the settlement edge and Blackthorn Hill. The landscape study assigns 'medium-high' sensitivity, such that this is one of the two most sensitive Bicester landscape parcels. There is good potential to masterplan and design the scheme so as to minimise landscape impacts, and it is recognised that there are potentially opportunities associated with increasing access to Blackthorn Hill (where there is a historic windmill, and from where it may be possible to gain an appreciation of Bicester in its landscape setting), but there is clearly a degree of inherent constraint.
- 6.12.5 Finally, **Wendlebury** has a strong rural and historic character, which is likely to be recognised and appreciated, as discussed. However, the Landscape Study assigns only 'low-moderate' sensitivity, and there would be the potential for growth to be very well contained by the M40 and flood risk zones.
- 6.12.6 In **conclusion**, 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.

## 6.13 Transport

1	2	3	4	5	6	7	8	9
Constants	Kidlington	Shipton Quarry	SE Bicester	SE Bicester, Kidlington	SE Bicester Shipton Quarry	Wendlebury	Wendlebury, Kidlington	Wendlebury, Shipton Quarry
★1	★1	★1	★1	★1	★1	★1	★1	2

- 6.13.1 Supporting the achievement of transport objectives is of great importance locally, and there is a need for a strategic approach, working in close collaboration with the County Council. Transport objectives have close ties to a wide range of other planning and sustainability objectives, including in respect of decarbonisation, health / wellbeing and economic growth. With regards to decarbonisation objectives, it is important to be clear that supporting the achievement of strategic transport objectives is one of the primary mechanisms by which local plans can support the achievement of decarbonisation goals.

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

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

- **Shipton Quarry** – is associated with some inherent transport challenges, on account of its location near equidistant between the District's two main road corridors, namely the A44 and the A34. However, there are also a range of transport-related arguments in favour of the site and the specific proposed scheme. In particular, there is a firm commitment to deliver a new train station, albeit this would not be centrally located within the site. Also, the site benefits from good proximity to Kidlington (most importantly) and Woodstock. Furthermore, there is merit to the proposed scheme, with transport infrastructure, innovation etc seemingly a central pillar of the masterplanning concept, plus the proposal to deliver significant new employment land onsite is supported. However, as per all the sites in question, there is a need to be mindful that the proposed scheme is subject to change. Indeed, the assumption here is that the scheme would deliver ~2,000 homes, mindful of onsite constraints (notably biodiversity and historic environment), in contrast to the ~2,500 homes discussed by the site promoter.

N.B. this discussion is unchanged from 2023, but the site promoters stated through their consultation response in 2023: *"The SA has failed to recognise that The Shiptons primary emphasis is looking to significantly reduce the use of private cars in its entirety, delivering a self-contained settlement that allows its residents to use alternative forms of transport as the quickest and easiest method of transport to travel around the new community, and where longer distant trips are required these can be achieved via the new rail service to the site. The Shiptons vision is also to provide a direct active travel route to Woodstock, thereby allowing Woodstock to have access to a rail service, as well as working with the County to establish further active travel routes to surrounding communities."*

- **Wendlebury** – is ~3.5km from Bicester town centre, but development could be supportive of strategic transport objectives for Bicester, as has been discussed. Ultimately, there is much uncertainty at this stage, including because the current assumption is a scheme of ~1,000 homes, in order to avoid constraints, which is in contrast to the ~2,850 homes discussed by the site promoter (noting that the site promoter did not acknowledge the Interim SA Report in their 2023 consultation response). There could be a need for considerable investment to achieve good road access to the site.
- **Kidlington (North of the Moors)** – is broadly supported, from a transport perspective, given excellent potential to walk / cycle to key destinations, including: schools and other services / facilities in Kidlington; strategic employment areas at Kidlington / Oxford City Airport and Begbroke; and Oxford Parkway Station. However, it is recognised that there is no rail connectivity (the Partial Review key diagram presents an indicative location for a new train station between Yarnton and Kidlington, but delivery cannot be assumed), and that the site is located between primary bus corridors. There is also a need for further work to confirm the potential to achieve good access to the site from the Moors.
- **SE Bicester** – is well located on the A41, but there are challenges in respect of accessing Bicester town centre (including due to a problematic EWR level crossing) and accessing Oxford / the M40, in the absence of a southern Bicester link road. There is also the need for further work to confirm walking / cycling connectivity from southern extent of the site to a local centre and Bicester town centre.

6.13.4 In **conclusion**, 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).

6.13.5 Furthermore, there is a transport-case for planning for increased flexibility in respect of unmet need, given the crucial importance of minimising commuting longer distances to 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.

## 6.14 Water

1	2	3	4	5	6	7	8	9
Constants	Kidlington	Shipton Quarry	SE Bicester	SE Bicester, Kidlington	SE Bicester Shipton Quarry	Wendlebury	Wendlebury, Kidlington	Wendlebury, Shipton Quarry
2	3	1★	1★	3	1★	1★	3	1★

- 6.14.1 Capacity at wastewater / **sewage treatment works** is typically the issue that has the greatest bearing on the consideration of local plan reasonable alternative growth scenarios.
- 6.14.2 Capacity at existing treatment works can often be increased to accommodate increased flows (at least hydraulic capacity of the works; biological and chemical capacity of the receiving water course to accept an increase in treated water can prove more challenging). However, there are cost implications, and a risk of unforeseen issues and delays. As such, there is merit to directing growth to locations with existing capacity and/or no barriers to increased capacity.
- 6.14.3 However, there is currently limited available evidence to enable differentiation between the degree of constraint affecting existing treatment works and, in turn, the merits of competing growth locations that are a variable across the growth scenarios.
- 6.14.4 Evidence comes from the Oxfordshire Water Cycle Study (2021), which was prepared with a view to informing the Oxfordshire Plan, prior to a decision being made not to progress the plan; however, the report's conclusions are high level. Appendix A of the Study assigns a 'red' (constrained) rating to Banbury, Bicester and the northern part of Kidlington in terms of sewage treatment works capacity but suggests that there may be less constraint affecting the southern / western part of Kidlington. It also finds:
- "An assessment of wastewater treatment capacity found that there are significant differences in the percentage of existing treatment capacity which would be used up by growth, depending on the spatial option selected, with the greatest pressure coming from Option 2 which focusses all growth around Oxford. Whilst this spatial scenario would be highly likely to require a very significant expansion of treatment capacity at Oxford... this does not necessarily make this an unfavourable option. Large upgrades at a small number of key works may be more efficient than upgrading large numbers of... treatment works..."*
- 6.14.5 Further evidence comes from Thames Water's response to the Draft Plan consultation in 2020, where for all allocations they concluded [emphasis added]:
- "... we do not envisage infrastructure concerns regarding wastewater network or wastewater treatment infrastructure capability in relation to this site/s. It is recommended that [parties] liaise with Thames Water at the earliest opportunity to advise of the developments phasing."*
- 6.14.6 This was notably the response provided for the option of a 300 home allocation at **Kidlington** (which was a proposed allocation in 2023 and is now a variable across the current growth scenarios), but there is now a concern regarding capacity at Oxford STW, which could potentially serve this site (it has not been possible to establish whether this would be the case, but there appears to be a strong likelihood).
- 6.14.7 The Infrastructure Delivery Plan (IDP, 2024), which explains: *"The Oxford Waste water Treatment Works site is key for water treatment in the south of Kidlington. This site is complex and Thames Water are considering options to expand capacity here in consultation with the Environment Agency."*
- 6.14.8 The following recent statement from Oxford City Council is also of note:
- "We have long been raising the major problems created by the historic lack of investment by Thames Water in the Oxford Sewage Treatment Works, and its subsequent lack of capacity."*



*This lack of investment has now led to the Environment Agency objecting to both the City Council's proposed Local Plan 2040, and to housing and commercial planning applications... This is a very significant environmental and economic issue for both Oxford and Oxfordshire.*

*This is all part of a wider range of problems including the quality of water in our rivers and the sewage blockages and spills that have caused so much upset to householders and communities across our city.*

*Protecting and improving the water quality in our rivers and streams is fundamental, as is having adequate water supply and sewage capacity. We need to have the right infrastructure in place to do this...*

- 6.14.9 With regards to information received from site promoters, for **Wendlebury** the site promoters explain that *"the outline strategy for the majority of the site is likely to rely on conveying wastewater directly to Bicester Sewage Treatment Works approximately 1.5 km to the north-east of the site. This would be via a new rising main from a terminal pumping station built on the site. The site levels are such that there would be a further two pumping stations in addition to the terminal pumping station."* This is very helpful clarity.
- 6.14.10 As a general point, it is fair to say that large scale strategic growth locations can tend to be associated with a degree of merit, relative to a strategy involving greater dispersal of growth across smaller sites. They provide an opportunity to arrange infrastructure in an idealised way and can support innovative systems, including an 'integrated' approach to water management, which links: sourcing water (typically abstraction from an aquifer, but also rainwater harvesting and wastewater reclamation); managing demand (e.g. an ambitious target is 85 l/p/d); wastewater treatment (as discussed); discharge of treated wastewater (which can be important for avoiding low flows); and the recharging of groundwater (large strategic sites give rise to an opportunity in respect of careful planning of high quality SuDS).
- 6.14.11 With regards to the **supply of water** (both for homes / businesses and riverine / wetland habitats), this is not likely to be something that has a significant bearing on the choice between LPR growth scenarios, because the issues are sub-regional (and the assumption must be that lower growth in Cherwell would necessitate higher growth elsewhere in Oxfordshire). The Oxfordshire Water Cycle Study concludes:
- *"The Thames Water WRMP demonstrates how the Swindon and Oxfordshire (SWOX) water resource zone has moved into a situation of supply-demand deficit and, without intervention, this will increase as a result of population growth, climate change and sustainability reductions."*
  - *"The WRMP goes on to outline a set of demand management and supply improvement measures to address this. Key to this is development of the Abingdon Reservoir by 2037... although it should be noted that this is currently being evaluated alongside other Strategic Resources Options."*
  - *"The Standard Method and Business-As-Usual household growth forecasts being considered by the Oxfordshire Plan are all at or below the Thames Water forecast. The Transformational rate of growth would be above what Thames Water has planned for; however, this is a long-term plan with opportunity for Thames Water to respond to changing demands. Furthermore, demand for water in the SWOX [zone] is also dependent upon growth in neighbouring planning authorities."*
- 6.14.12 In **conclusion**, the appraisal reflects issues affecting Oxford STW, albeit it has not been possible to confirm that the Kidlington site would drain to this STW, and there is likely to be a technical solution in time (at a cost and with associated risks to funding and delivery). This also leads to an argument for higher growth scenarios that would provide flexibility for potential further unmet need from Oxford City.
- 6.14.13 With regards to significant effects, whilst the equivalent appraisal in concluded 'moderate or uncertain' negative effects for all growth scenarios appraised, it is now considered only appropriate to flag negative effects for the worst performing scenarios. Thames Water did not raise any concerns through the consultation in 2023 in respect of STW capacity, and this was similarly the case with the Environment Agency, who stated: *"The WCS should also identify where STWs... are frequently operating their storm overflows. It would be good to see a policy that commits to not connecting new developments to STWs with known hydraulic capacity issues, until these are resolved. The WCS should identify these."*<sup>29</sup>

<sup>29</sup> There was no comment made on the reasonable alternative growth scenarios in 2023, despite the following request: *"...it would be greatly appreciated if stakeholder could provide their views on the reasonable alternative growth scenarios, with a view to ensuring a suitably strategic and proactive approach to water."*<sup>29</sup>

## 6.15 Appraisal summary

6.15.1 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).

6.15.2 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 topic, such that the intention is not for a total score to be calculated 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).

**Table 6.2: The reasonable growth scenarios – summary appraisal findings**

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

6.15.3 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 the 4,400 homes already committed. 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 any). There is a strong case to suggest low likelihood of further unmet need, but the possibility cannot be ignored, because planning proactively for unmet need is important for the achievement of a wide range of sustainability objectives.

6.15.4 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, notwithstanding the uncertainties.
- **Biodiversity** – under this heading it is difficult to conclude that higher growth aimed at allowing flexibility for further unmet need from Oxford 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.
- **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.

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 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 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. Equally, there is a case for not moving too fast too soon, e.g. the Kidlington area has extensive committed growth which might be allowed time to progress / deliver before considering further growth with a long term perspective, potentially via a sub-regional plan.

- **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 in Section 5.2 as: A) affordable housing needs; B) residual uncertainties in respect of unmet need; and C) a potentially case to be made around growth ambitions linked to economic development. Also, there is a need to note the Government's draft new standard method figure for the District, which is 38% higher than the existing figure that is the basis for the current plan, and another consideration is high rates of recent housing delivery (although it is important to note that delivery rates have recently decreased significantly).

None of the sites that would be additionally allocated under Scenarios 2 to 9 would be likely to deliver early in the plan period (assuming the Oxford STW constraint affecting Kidlington), 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 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 STW, albeit it has not been possible to confirm that the Kidlington site would drain to this STW, and there is likely to be a technical solution in time (at a cost and with associated risks to funding and delivery). This also leads to an argument for higher growth scenarios that would provide flexibility for potential further unmet need from Oxford City. With regards to significant effects, whilst the equivalent appraisal in concluded 'moderate or uncertain' negative effects for all growth scenarios appraised, it is now considered only appropriate to flag negative effects for the worst performing scenarios. Thames Water did not raise any concerns through the consultation in 2023 in respect of STW capacity, and this was similarly the case the Environment Agency

6.15.5 The aim is for the above appraisal findings to inform a decision regarding which of the scenarios best represents sustainable development on balance.



## 7 The preferred approach

### 7.1 Introduction

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

### 7.2 Selecting the preferred scenario

- 7.2.1 The following statement explains CDC officers' reasons for supporting **Scenario 1**.

#### Statement provided by Officers in light of the appraisal

"The appraisal provides strong support for Scenario 1, and whilst the arguments in favour of higher growth scenarios are accepted, there is no clear case for higher growth at the current time, i.e. given current understanding of housing needs and ahead of knowing Oxford City's next steps. 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).

The Proposed Plan sets out a vision and proposes homes, employment land, infrastructure and other essential services required to support the local community over the Plan period. The district-wide strategy is supported by area strategies for Banbury, Bicester, Kidlington, Heyford Park and the Rural Areas.

Since the commencement of the Local Plan Review there have been a number of notable changes, not least to the evidence and relating to housing and employment need. The HENA is no longer supported as a source of evidence following methodology issues raised through the Examination of the Oxford City Local Plan and this Local Plan Review now seeks to use the standard method as its starting point for calculating housing need. The uncertainty around providing for additional unmet housing needs for Oxford City, and whether this would result in an increase, should the City take forward a new plan based upon the standard method remains unclear, nevertheless the previously identified unmet need remains within the new housing requirement of this Local Plan Review. Arguments for adopting a higher figure (as considered at Section 5.2, above) are not supported, nor is it considered that a lower housing requirement below housing need (standard method LHN plus existing committed unmet need) would be appropriate.

The spatial strategy remains largely unchanged from earlier versions of the Local Plan and previous Plans with development focussed at Bicester and Banbury. New settlements are considered and assessed, but at this point, the need does not exist to pursue this as an alternative option or as an addition to the strategy of the Plan.

The appraisal considers nine growth scenarios including and beyond our preferred Scenario 1. Scenario 1 is the preferable scenario under the greatest number of topics and has equal fewest likely negative effects. Scenarios 2-9 present with mixed results and there are clear benefits to a number of these scenarios. However, there are also clear drawbacks. For example, and notably:

- Scenarios 7, 8 and 9 do not perform as well under climate change adaptation, primarily with a focus on flood risk. This includes scenario 9 – the highest growth scenario.
- Scenarios 2, 3, 5, 6, 8 and 9, whilst providing higher growth scenarios, include sites within the Green Belt and it is not considered that exceptional circumstances exist to release this land for development."

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

## 8 Introduction to Part 2

- 8.1.1 The aim here is to present an appraisal of the Proposed Submission LPR as a whole.
- 8.1.2 In practice, the appraisal builds upon the appraisal of Growth Scenario 1 presented in Section 6. Specifically, the appraisal revisits the appraisal of Growth Scenario 1 with added consideration given to:
- site allocations that are a 'constant' across the growth scenarios appraised in Section 6; and
  - draft policies (both district-wide and site-specific).

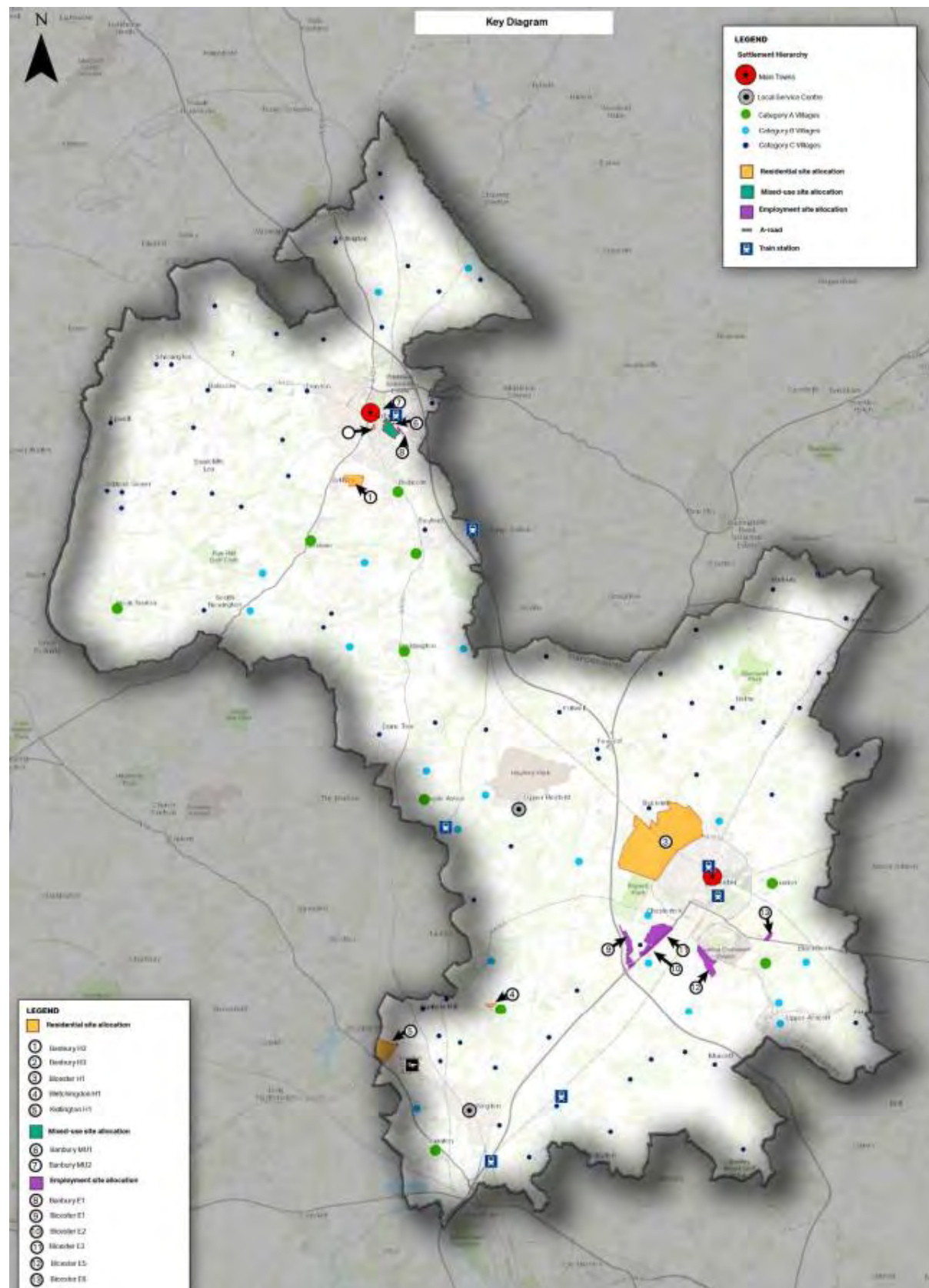
### Overview of the plan

- 8.1.3 The plan document firstly presents policies under three thematic headings: 1) Meeting the challenge of climate change and ensuring sustainable development; 2) Maintaining and developing a sustainable local economy; and 3) Building healthy and sustainable communities. Secondly, the plan presents policies specific to Banbury, Bicester, Kidlington, Heyford Park and the Rural Area in turn.
- 8.1.4 The appraisal aims to focus on the proposed housing requirement and the proposed approach to spatial strategy and site selection, whilst also considering how other policies will serve to mitigate the impacts of growth and ensure that growth-related opportunities are realised.<sup>30</sup> As such, the appraisal particularly focuses on: 1) Policy LEC 1 Meeting Business and Employment Needs; 2) Policy COM 1: District Wide Housing Distribution; and 3) the area strategies.

### Appraisal methodology

- 8.1.5 Appraisal findings are presented across 13 sections below, with each section dealing with a specific sustainability topic. For each sustainability topic the aim is to discuss the merits of the Proposed Submission LPR, as a whole, before reaching an overall conclusion on significant effects.
- 8.1.6 Specifically, the regulatory requirement is to "identify, describe and evaluate" the significant effects of "the plan" taking into account the available evidence and also mindful of wide-ranging effect characteristics, e.g. effects can be short or long term, direct or indirect, and where:
- An effect is a predicted change to the baseline situation, which is not simply a snap shot of the current situation, but also a projection of the current situation in the absence of the Local Plan. As part of this, there is a need to recognise that housing growth locally would continue in the absence of the LPR.
  - The significance of any given effect is judged taking into account not only the magnitude of the predicted change to the baseline situation but also established objectives and targets (e.g. in respect of net zero).
- 8.1.7 Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the LPR. The ability to predict effects accurately is also limited by knowledge gaps in respect of the baseline (both now and in the future). In light of this, there is a need to make considerable assumptions regarding how the LPR will be implemented and the effect on particular 'receptors'.
- 8.1.8 The appraisal aims to be systematic and to explain assumptions. However, there is also a need for conciseness and accessibility, for example noting that a Government Committee in 2022 emphasised a need to: "*streamline the current bureaucracy and overcomplication associated with... assessments.*" Also, in 2023 SA was described within a Government consultation as "*... a nightmare... unintelligible...*"
- 8.1.9 In practice, there is a particular focus on the proposed approach to land supply / spatial strategy or, in other words, the proposed allocations in isolation and in combination (also accounting for permissions).
- 8.1.10 This approach is also taken mindful that the Government's Planning Practice Guidance (PPG) is clear that SA should focus on significant effects, which translates as a need to focus primarily on the merits of the proposed approach to land supply (allocations and broad locations; see NPPF paragraph 69) to meet objectively assessed needs and wider plan objectives. There is inherently relatively limited potential to predict significant effects for borough-wide thematic policy, mindful that significance is defined in the context of the plan as a whole. Equally, it is the proposed approach to land supply / spatial strategy that generates overwhelmingly greatest interest amongst local residents and wider stakeholders.

<sup>30</sup> This approach is taken of the need to focus the appraisal on significant effects.

**Figure 8.1: The key diagram**



## 9 Appraisal of the draft plan

9.1.1 This section presents an appraisal of the LPR as a whole under the SA framework.

### 9.2 Air and wider environmental quality

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

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

However, the proposed greenfield allocation is not directly linked to a 'green' rated transport corridor (see Figure 5.1 in the TA), and Table 5-3 of the TA assigns a modest overall transport score to the site. More specifically, Table 5-3 finds only the western part of the site to have "reasonable" connectivity, and this is an area of sensitivity now proposed for greenspace. The wider context is the new link road between two radial A-road corridors, along which there might be the potential to support a bus service.

- **Bicester** – is also associated with a problematic air quality management area (AQMA). The proposed relatively high growth strategy should assist with funding strategic transport infrastructure upgrades, most notably a southern Bicester link road (which would allow the A41 to be prioritised for public transport and walking/cycling), but it is important to note the change of strategy since the Draft Plan stage, with an enhanced focus on NW Bicester, where there are delivery (and potentially viability) challenges.

It can also be noted that the TA (2022) is fairly supportive of both of the proposed residential allocations that are now no longer included in the plan (one replaced by an employment allocation). Specifically, both sites are ranked 'mid table' amongst the sites assessed (see the table on page iv).

- **Kidlington** – the proposed allocation east of Woodstock is strongly supported by the TA, and work has been ongoing to confirm the transport opportunity, and also to masterplan the site in such a way that ensures good links to Woodstock whilst also respecting historic environment sensitivities, although there remains a degree of concern regarding distance to a primary school (with capacity). Noise pollution from the adjacent A-roads is a constraint but was explicitly addressed as part of a recent application.
- **Heyford Park** – is no longer proposed for growth over-and-above that which is already allocated (2015), which is tentatively supported from an air quality perspective. In 2023, when there was support for additional growth, the Interim SA Report had stated: *"There are naturally challenges given Heyford Park's location, including in terms of public transport connectivity and problematic traffic through rural villages, but the proposed growth strategy aims to support investment in transport infrastructure, a higher frequency bus service and (potentially, in the long term) higher rates of trip internalisation."*
- The **broad strategy** of meeting housing and employment needs, including unmet housing needs from Oxford, is supported, given the alternative of increased pressure for growth at locations outside the District that are potentially less well-connected in transport terms.
- There is also the matter of directing 565 homes to **non-strategic sites** at villages. This approach is supported, as it is thought to strike an appropriate balance (see Section 5.4). Higher growth could risk problematic car dependency / travel, but lower growth could risk village services / facilities. It is also important to note that the TA shows accessibility / connectivity to vary significantly between villages.
- With regards to **development management policy**, the key matter is clarifying expectations of developers in respect of site-level infrastructure delivery and developer contributions towards strategic infrastructure delivery, primarily in terms of transport infrastructure, but also community infrastructure (with a view to supporting trip internalisation and modal shift to walking / cycling). The plan presents many encouraging proposals, but these warrant ongoing scrutiny, including in discussion with site promoters and partner organisations, and including from a viability perspective.

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

## 9.3 Biodiversity

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

- **Bicester** warrants being a focus of attention, particularly given the sensitive landscape of the Upper Ray Meadows, to the south of the town, and perhaps the key point to note is support for deletion of the previously proposed SE Bicester allocation (South East of Wretchwick Green).

There are also biodiversity sensitivities in the Chesterton area, given a series of flood / surface water flood channels (albeit there is limited priority habitat) and mindful of a SSSI ~3km downstream. The new proposal is for a sole focus on employment land, and it is noted that assumed developable area within each of the allocations is low, including with a view to allowing space for green / blue infrastructure.

Finally, the new proposal (relative to 2023) to extend the western part of North West Bicester is notable from a biodiversity perspective, including given nearby Ardley Cutting SSSI, but this is potentially a green infrastructure opportunity as well as a constraint. As discussed in Section 5.4, there is now confidence that the new proposed boundary is defensible, such that an expanded Bicester will have a clear setting not only to the north of the Upper Ray Meadows but also to the south of valued farmed countryside. The new proposed approach also helps to ensure space for generous green infrastructure within the site.

- At **Banbury** the proposed allocation gives rise to relatively limited biodiversity concerns. However, it is noted that BBOWT commented through the consultation in 2023: *"We note that this is close to the Northern Valleys CTA and are concerned by the impact. It is important that the integrity of this CTA and its sites, habitats and species is not negatively impacted, and indeed that positive action to support the CTA through for example appropriate habitat creation is required if the site is taken forward."*

Finally, with regards to Canalside, which is a committed site (existing allocation) but where there has been consideration of options as part of the process of preparing the LPR (it was a proposed allocation in 2023), the Environment Agency notably commented through the Draft Plan consultation:

*"Extreme care should be taken when designing the layout of this development, in particular any additional river crossings and we advise consultation... to ensure that the negative impact is minimised. This will need careful consideration as this could impact on the deliverability of this site."*

- The proposed allocation at **Kidlington** (Woodstock) also gives rise to relatively limited biodiversity concerns, although there are significant tree belts along two sides of the site, which comprise priority habitat. BBOWT commented briefly through the consultation in 2023 regarding proximity to a SSSI, but the SSSI to the east is a geological SSSI, and that to the west is located on the opposite side of Woodstock (such that there is a case for supporting growth to the east of the town). It is also noted that BBOWT are "greatly concerned" regarding the previously proposed allocation at Kidlington itself (North of the Moors), which is no longer included in the plan (but is explored in detail in Section 6, above).
- **Heyford Park** – is no longer proposed for growth over-and-above that which is already permitted, which is tentatively supported from an air quality perspective, noting that BBOWT were "greatly concerned" regarding the previous proposal in 2023 for an LPR allocation. However, the Interim SA Report (2023) has concluded that the allocation option "gives rise to limited concerns, from a biodiversity perspective".
- The **broad strategy** of including a focus at larger strategic sites is supported, because such sites can give rise to a particular opportunity in respect of masterplanning with biodiversity in mind, and also supporting investment in offsite interventions in support of strategic objectives. For example, Figure 9.1 below shows the latest concept plan for the proposed greenfield allocation south of Banbury. It is unfortunate that the scheme could not have been planned comprehensively with the site under construction to the north, but there is now confidence in the ability to define a new long-term urban edge that is respectful of the surrounding landscape, historic environment and biodiversity sensitivities.

With regards to **development management policy**, it is again the case that the primary consideration is providing strategic guidance in respect of the expectations on developers, in terms of avoiding areas of sensitivity and delivering enhancements. Early clarity can assist with effective masterplanning and ensuring green/blue infrastructure feeds into viability calculations alongside wider infrastructure. In particular, the following requirement for all five of the Bicester employment allocations is of note:

*"Preservation and enhancement of habitats and species on site, particularly protected species and habitats and creation and management of new habitats to achieve an overall net gain in biodiversity including the creation of a local nature reserve and linkages with existing BAP habitats. Opportunities for wetland habitats along the existing waterways on the edges of the site."*

This represents a stringent approach, but there is a need to ensure that site-specific policy is well-targeted, noting considerable variability across the sites (with key sensitivities south of Chesterton).

- Also, and importantly, **Core Policy 12** (Biodiversity net gain, BNG) sets out to go beyond the statutory minimum requirement (10%), by requiring: “*At least 20% biodiversity net gain will be sought in the Nature Recovery Network Core and Recovery zones, and the strategic allocations in this Plan.*” This is strongly supported, from a biodiversity perspective, and is considered to be a well-targeted policy. It is also noted that the plan includes a strong focus on setting out strategic green / blue infrastructure priorities, and so it will be important to consider the circumstances under which developers might fund such schemes in order to generate biodiversity credits, for the purposes of biodiversity net gain calculations.

9.3.2 In conclusion, accounting for changes to site allocations since 2023 alongside district-wide policy and site specific policy it is now appropriate to predict a **'moderate or uncertain' positive effect** for the LPR as a whole, recalling that the baseline situation is one whereby development continues to come forward. The ISA Report (2023) concluded by suggesting *"a need to take close account of consultation responses received"* and also a need for *"detailed work ahead of plan finalisation, e.g. for SE Bicester"* and it is considered that the LPR has progressed well in these respects. Natural England did not raise major concerns with strategy / sites in 2023, although there is a need to liaise further on Ardley Cutting SSSI.

**Figure 9.1: Concept plan for south of Banbury**



## 9.4 Climate change adaptation

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

- A key issue is the fluvial flood risk affecting **Canalside** at Banbury. The site is an existing allocation for 700 homes, and this remains the current proposal, but the Interim SA Report (2023) had explained:

*“... there is an identified opportunity to deliver fewer homes and a greater amount of employment land, which would be preferable from a flood risk perspective... The site is allocated for 700 homes in the adopted local plan (2015), such an adjusted allocation could well represent an improvement on the baseline situation. However, there remains uncertainty at the current time, before a final decision is made on the proposed intensity of uses on the site, accounting for both new homes and employment land. Also, climate change has come more to the fore since 2015... Housing-led brownfield regeneration schemes in areas of flood risk are not uncommon nationally, given good potential to mitigate flood risk, including through: avoiding vulnerable uses on the ground floor; measures to ensure safe access / egress; flood resistant design (e.g. to prevent water from entering); and flood resilient design (e.g. to ensure structural integrity is maintained and to facilitate drying / cleaning). However, given climate change concerns, there is nonetheless a need to question the merits of directing new homes to areas that have historically been seen as appropriate for less vulnerable uses...”*

The Environment Agency did not raise major concerns through the consultation in 2023, but stated the following in respect of Canalside and Higham Way (the latter site now being proposed for employment):

*“To ensure these sites are justified and deliverable, a Level 2 SFRA that assesses whether these sites can be built without increasing flood risk elsewhere and ensuring future occupants would be safe is required... The best available flood risk information should be used... the best available model we hold is the Cherwell (Banbury) 2015... The Cherwell 2015 model considers the impacts of the Banbury Flood Alleviation Scheme (FAS), which reduces the risk of flooding to both proposed allocations... [Also] your Level 2 SFRA should consider future maintenance, funding and impacts of climate change associated this flood defence, as well as flood risk should the defence fail or be breached.”*

A Level 2 SFRA has now been completed, and makes the following recommendations:

*“It is recognised that Flood Zone 2 covers over 75% of the site, therefore it will be necessary to locate a substantial amount of infrastructure outside of Flood Zone 1. The proposed use of the site is mixed with 9 hectares of land reserved for employment. A site level sequential approach should be applied, prioritising more vulnerable residential development in Flood Zone 1 and Flood Zone 2 where possible.*

*Less vulnerable employment development is also preferred in these zones however can be located in Flood Zone 3a if more space is required for residential uses. A large part of the southern part of site is within Zone 3b, which limits the area available for both residential and employment development...*

*Development should be set at a floor level to provide an appropriate freeboard above the design flood level taking account of climate change. Climate change mapping for the 100-yr + 25% event shows a significant increase in flood extent relative to Flood Zone 3a (58% of site area).*

*Existing access to the site is within Flood Zone 2, any access road should be designed appropriately to allow safe access/egress.*

*Impacts of built development within the allocated sites on floodplain storage and flood flows should also be considered. It is currently unclear what quantum of development can be delivered without increasing flood risk elsewhere.*

*Parts of the site also fall within areas benefitting from flood defences which will reduce the flood risk shown. The impacts on floodplain storage and role played by flood defences should be considered as part of a level 2 SFRA with further assessment in a site specific FRA.”*

Overall, therefore, it is clear that there remain a range of issues and uncertainties, such that there is a need for ongoing scrutiny of the appropriate development density on the site, albeit recognising the need to balance development viability and the crucial importance of making best use of this underutilised land on the edge of Banbury town centre and very close to the train station. Just on downstream flood risk, the Interim SA Report (2023) stated: *“Downstream flood risk is potentially an issue; however, there is a need to account for the fact that there is already extensive built form across the site, so it could well be that there is the potential to maintain or enhance the current flood storage capacity of the site (which isn't to say that there are not alternative uses that could deliver more flood storage capacity still).”*

Finally, there is a need to consider adjacent Higham Way, the new proposed approach is supported. The Interim SA Report (2023) stated: *“The likelihood appears to be that the plan will ultimately support employment uses on the site (only), but the door is currently left open to rolling forward the existing 2015 allocation for 150 homes. Downstream flood risk is potentially more of an issue here, as there is more limited existing built form on the site.”*

It is also important to note **policy requirements** as follows:

*“To assess the potential flood risk in the Canalside area, a [Level 2 SFRA] has been undertaken... This confirms that with the implementation of the Flood Alleviation Scheme and the implementation of other measures on the site the site can be redeveloped safely. Applications will be required to follow the requirements set out in the Strategic Flood Risk Assessment and a detailed Flood Risk Assessment (FRA) for the site will be required with any planning application.*

*Additional requirements for this large complex site include...*

*... The Council believes that the most effective and equitable means of promoting development at Canalside will be based on an outline planning application being made by consortia of key landowners and/or their developer partners, supported by a masterplan. It is expected that key landowners will have agreed a means of capturing and mutually benefiting from the uplift in land values as a result of a successful development scheme. However, if supported by a strategic masterplan, proposals within sub areas A or B may be permitted provided that they clearly demonstrate that they will contribute towards the delivery of the Council's wider vision for the whole Canalside area. Proposals for smaller parcels may exceptionally be supported where it is clearly demonstrated that the development will positively contribute towards the comprehensive and integrated regeneration of the site as a whole.”*



- Elsewhere, there are limited concerns. There is a series of fluvial / surface water flood channels in the **Chesterton** area (see Figure 6.5), and there is a need to be mindful of downstream flood risk affecting Wendlebury, but there will be good potential to integrate flood zones as part of a blue infrastructure strategy, and high quality sustainable drainage systems (SuDS) should serve to ensure no increased downstream flood risk. For Bicester in general the EA notably commented in 2023:

*“We strongly recommend detailed flood models are provided at this stage for any sites... This applies both to locations where detailed modelling is not yet available as well as to areas where current detailed models do not include appropriate climate change allowances... There have previously been difficult situations in Cherwell District when detailed models for allocated sites were not created until the planning application stage, and the models showed a significant increase of flood risk on site which meant it was difficult or not possible to deliver the scale of development allocated.”*

- 9.4.2 In conclusion, given that a Level 2 SFRA has been prepared in accordance with the expectations of the Environment Agency it is now appropriate to predict an overall **neutral effect**. However, there are residual risks and uncertainties at Canalside to be further considered through Flood Risk Assessment.

## 9.5 Climate change mitigation

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

- Focusing on built environment greenhouse gas emissions, as per the discussion in Section 6, and all other things being equal, there can be support for **larger strategic sites** over-and-above smaller sites. This is because such sites can be associated with economies of scale, which can help to make investment on decarbonisation focused interventions more of a viable proposition, and because opportunities can be realised through strategic masterplanning, for example higher density mixed use areas around local centres or transport hubs, which might support a district-scale heat network and/or large scale battery storage facilities distributed through the scheme to balance power supply (typically from rooftop solar) and demand over the course of the day. In this light, there is a degree of support for the proposed strategy, and it is not clear that there is a reasonable alternative strategy that performs better (see Section 6). However, this matter – of exploring growth at scale and/or growth directed to sites where strong viability, in order to realise decarbonisation opportunities – warrants further scrutiny.
- The largest of the proposed allocations is **South of Banbury**, which is of somewhat limited scale (600 homes, as an extension to an existing strategic urban extension that is under construction), but there is also a need to consider the proposal to support an additional 1,500 homes at **North West Bicester** (relative to the adopted local plan, and 500 additional homes relative to the proposal in 2023).

NW Bicester has been promoted as an Ecotown for a decade now, such that the decarbonisation ambition has been subject to considerable scrutiny. Most recently, permission was recently (July 2023) granted at appeal for a 530 homes scheme (Ref. [21/01630/OUT](#)) adjacent to the Elmbrook part at the eastern extent of the NW Bicester allocation, which is the only part of the allocation to have delivered to date, and has gained national attention as a low carbon exemplar. The appeal decision explains that the 530 home scheme (known as “Firethorn”, which is the name of the developer) will deliver “True Zero Carbon”, which is defined as: “over a year the net carbon dioxide emissions from all energy use within the buildings... are zero or below.” The key question is whether / the extent to which there is allowance for offsetting, as opposed to achieving zero carbon onsite, which is a matter discussed within the [appeal decision](#). Ultimately, the approach taken to net zero is considered highly ambitious; however:

*“the appeal development cannot viably provide for 30% affordable housing... whilst delivering a True Zero Carbon development... and mitigating its infrastructure impacts... However, the appellant has offered a minimum of 10% affordable housing, which will require a reduced developer margin.”*

The recent 3,100 home Hawkswell Village planning application (ref. [21/04275/OUT](#); 3,100 homes) has not been reviewed in detail, but the proposal to deliver an adjacent small solar farm is also noted. There is a need to consider whether this would feed the national grid, which could make it quite a different proposition (from an energy hierarchy perspective) to rooftop solar directly feeding the development.

- The proposed allocation at **Kidlington** (Woodstock) is smaller, but it could be associated with strong viability, which could well be supportive of delivering homes to a stringent ‘net zero’ standard. Indeed, this was the proposal as part of a recent withdrawn planning application (see the Design and Access Statement, [here](#)). Also, it is worth noting that the site has a longer planning history, including a 2014 application for 1,500 homes across both this site and the site now under construction to the west.

- With regards to **development management policy**, the key policy here is Policy CSD 2: Achieving Net Zero Carbon Development – Residential, which has been notably adjusted since the Draft Plan stage (2023), at which time the SA Report concluded: *“the proposed approach is supported, as it appears to suitably push the boundaries of what is likely to be viable (subject to further investigations), reflecting the urgency of the issue (i.e. the 2030 net zero ambition).”*

The key point to note is that there is a clear requirement for achieving a stringent definition of net zero definition, which essentially means net zero development achieved in line with the energy hierarchy. Specifically, this means an efficiency (‘fabric first’) approach, i.e. such that there is not undue reliance on renewable heat and power generation, and also with offsetting only as an absolute last resort, i.e. such that net zero is achieved ‘onsite’. This is strongly supported, from a decarbonisation perspective, although it is important to recognise that the costs will feed into development viability calculations, such that there could be implications for achievement of other objectives, notably in respect of affordable housing delivery (see the Whole Plan Viability Study, 2024) if sites with challenging viability credentials are to be supported to come forward in a timely fashion, i.e. in line with the committed trajectory.

The following recommendation from 2023 has clearly been actioned: *“... most importantly, there will be a need for close scrutiny of the extent to which there is allowance for residual onsite emissions to be offset, recognising that offsetting sits at the bottom of the energy hierarchy...”*

Secondly, Policy CSD2 read in the context of the wider suite of climate change focused policies is commendably clear, such that the following recommendation from 2023 has been suitably actioned:

*“... there is a need to consider whether it might be possible to consolidate the current series of policies into one, with a view to supporting clarity and ease of understanding for the public, given the central importance of this issue (it will be an aspect of the local plan that generates a high degree of interest, and the local plan has an important educational role)... the supporting text should be reviewed for conciseness and clarity, with a view to clear messaging suited to the task of building public understanding, interest and capacity to engage in respect of the decarbonisation agenda. As stated within recent CSE/TCPA research (see footnote): “Empowering people with the skills to make their case must go hand in hand with enhancing their knowledge of the challenges and opportunities which will shape the future.”... As part of ensuring clear messaging, there is a need to ensure that there is not an undue focus on sequestration, at the expense of avoiding emissions in the first instance. Also, the text might explain that whilst transport emissions are set to decrease rapidly, due to the national switch-over to EVs, emissions from the built environment risk staying stubbornly high without policy intervention.”*

The reader is able to understand important distinctions including between: A) climate change mitigation / decarbonisation and climate change adaptation / resilience; B) minimising greenhouse gas emissions from the built environment versus from transport; and C) minimising built environment emissions associated with operational use versus wider emissions, including ‘embodied’ emissions, that contribute to ‘whole lifecycle’ built environment emissions.

Focusing on ‘whole lifecycle’ emissions, it is important to note that Policy CSD 5: Embodied carbon is also strongly supported, and its approach aligns with the following recommendation from 2023: *“... there is a need to consider whether a specific requirement should be set for specific developments, or categories of development (e.g. strategic versus non-strategic), albeit it is recognised that doing so could prove a complex and ultimately challenging exercise.”* The question arises as to whether the targeted approach in Policy CSD 5 could also be applied under Policy CSD 2, but it is recognised that the risk would be that Policy CSD 2 becomes overly complicated.

However, the following recommendation from 2023 potentially remains somewhat outstanding: *“... use of the “be clean, be lean, be green, be seen” hierarchy should be reviewed. The distinction between “be clean” and “be green” is not as intuitively clear as might ideally be the case; and, whilst “be seen” is a key,<sup>31</sup> it does not appear to feed through into policy.”* In respect of “be seen” though, it is recognised that Policy CSD2 now requires: *“Developments of 50 or more new dwellings will be required to monitor and report energy performance for the first 5 years of occupation.”* This threshold is potentially supported, as there can be concerns around the costs and administration of monitoring.

<sup>31</sup> [Research](#) on *Spatial planning for climate resilience and Net Zero* published by the Centre for Sustainable Energy (CSE) and the Town and Country Planning Association (TCPA) was published in July 2023. With regards to the “be seen” stage of the energy hierarchy, the research explains: *“The system of assessing, monitoring and enforcing the energy and carbon performance of buildings requires a radical overhaul to make it fit for purpose. This could be achieved (in part) through requiring developers to submit in-use energy and carbon data from new developments (for example from smart meters installed in new buildings).”*

The main outstanding question is around the metrics required under Policy CSD 2, with the proposal to apply the Building Regulations method as opposed to requiring that schemes are evaluated the energy-based methodology. Under the Building Regs method the question for any given planning application is the extent to which the development can improve on a Target Emissions Rate (TER), measured in percentage terms up to a possible 100% improvement, whilst the energy based methodology involves scrutiny in absolute terms, measured in terms of kWh /m2/yr. It has wide-spread support amongst specialists, including because it is very easily understood by non-specialists and because actual 'as built' performance can be monitored simply using a smart meter. A high proportion of recent and emerging local plans nationally present an energy based policy. However, on 13th December 2023 a Written Ministerial Statement was released which appears to prohibit its use. The two approaches are compared and contrasted in a recent report [here](#) and another even more recent report [here](#).

The Interim SA Report (2023) presented a brief review of recent and emerging local plans applying the energy-based method, and since that time it has emerged more fully as an approach with strong support amongst industry specialists and many local plan-makers. The Interim SA Report explained: *"The national policy environment is complex and constantly evolving, but a number of authorities have adopted, or are proposing, concise 'energy-based' net zero policies... These policies typically involve a clear focus on: A) space heating demand of less than 15kWh/m2/yr; B) overall energy use of less than 35kWh/m2/yr; C) on-site renewable generation equivalent to onsite use; and D) offsetting only if absolutely necessary."*

- 9.5.2 In conclusion, the proposed development management policy is very strong, which is a key consideration, but there is also a need to maintain a focus on realising built environment decarbonisation opportunities through spatial strategy and site selection. On balance, a **'moderate or uncertain positive effect'** is predicted, but this is marginal, as it is difficult to conclude with confidence that the LPR does all it can to support the achievement of the District's 2030 net zero target (but it will clearly have a very positive effect on the baseline). It is also recognised that built environment decarbonisation was not a focus of consultation responses received from key partner/stakeholder organisations in 2023, despite the following key recommendation set out at the equivalent point of the Interim SA Report:

*"Moving forward, as well as inputs from stakeholder organisations with an interest in decarbonisation, site promoters are encouraged to submit detailed evidence to demonstrate the potential to viably minimise onsite emissions, ideally to zero carbon. As part of this, it will be important to take account of the latest national precedents, including in respect of definitions of net zero..."*

## 9.6 Communities

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

- A headline key issue relates to the potential for residents of the proposed **East of Woodstock** allocation to access a primary school, as there would be no potential to deliver one onsite. The Interim SA Report recommended that "further work is needed to identify the most appropriate strategy" and whilst it is recognised that detailed work has been ongoing, there remains an element of uncertainty at the current time. In other respects this site is quite strongly supported, from a 'communities' perspective, particularly given the potential to deliver a very high proportion of the site as accessible greenspace, plus the site benefits from nearby facilities in the east of Woodstock, including a secondary school. The greenspace could have the effect of separating the new community from Woodstock to some extent, but the centre of Woodstock would still be within a reasonable distance (~1.5km). Also, it is important to recall that new residents will be located on a very high quality bus and cycle transport corridor (and the allocation will be supportive of further enhancements to the corridor, thereby benefiting existing residents).
- The second key matter to discuss is the new proposal to support a pure focus on employment land to the south of **Chesterton** (north of the A41), as opposed to a mix of homes and employment. This is supported from a 'communities' perspective, as discussed in Section 5.4. The possible drawback is around impacting the ability to realise the 'vision' for the A41 corridor as a walking, cycling and public transport corridor (once a southern link road is delivered), but there are no clear concerns in this regard.

The Interim SA Report had recommended: *"It will be important to ensure a comprehensive approach to growth [south of Chesterton / north of the A41] with a view to most fully realising opportunities for new / upgraded community, transport and green / blue infrastructure, with a view to securing 'planning gain'..."*

- There is also a need to briefly consider the proposal to support additional homes across an expanded **NW Bicester** allocation (see Section 5.4). Perhaps the key point to note is that from a ‘communities’ perspective there is merit to consolidating growth locations with a view to supporting community engagement and buy-in, in support of place-making. A changing Bicester might now be understood in terms of: A) recent growth areas (notably Kingsmere to the west); B) Graven Hill as the country’s largest self-build community, which is reaching maturity as a new community; C) North West Bicester as the major committed focus for plan-led growth, but also South East Bicester (Wretchwick Green); D) recent, committed and proposed new employment growth areas, most notably a new employment ‘gateway’ to the west); E) a changing town centre and wider urban area including linked to East West Rail; and E) recent and committed non-strategic growth at Ambrosden and Launton as a result of the District being subject to the presumption in favour of sustainable development (‘planning by appeal’).
- Finally, at **Banbury**, there is support for the urban growth locations from a communities perspective, and it is also understood that the proposed greenfield allocation generated relatively limited concern through the consultation in 2023. The Interim SA Report (2023) stated “no immediate concerns” but recommended *“there is generally a need to confirm plans for community infrastructure, given extensive nearby committed growth.”* In this regard work has been ongoing (e.g. see Figure 9.1, above) and the site-specific policy includes a range of clear requirements. However, these are mainly around avoiding constraints (e.g. *“a substantial landscape buffer between the developable area and Wykham Lane to maintain its rural character... Developable area to be pulled back from areas of archaeological interest...”*) as opposed to realising growth related opportunities. It is noted that the site is not expected to deliver any significant new onsite community infrastructure, although it will deliver improved active travel routes and will help to maintain and potentially enhance bus services.

Maintaining a focus on Banbury, the following from the Interim SA Report has been actioned: *“... there is also a need to note the overall limited growth strategy, given that certain wards are in the 20% most deprived areas in England. However, the focus on Canalside is supported, and it is not clear that there is any alternative strategy that would perform better, from a perspective of supporting regeneration, or otherwise addressing relative deprivation. Also, it is anticipated that town centre regeneration sites will be examined for allocation subsequent to the current consultation.”*

- With regards to **development management policy**, a wide range of policies are broadly supportive of communities objectives; however, and again, the key matter is clarifying expectations of developers in respect of site-level infrastructure delivery and developer contributions towards strategic infrastructure delivery. The plan presents many encouraging proposals, and clearly policies now benefit from having been subject to consultation (recalling that consultation on a full draft plan under Regulation 18 is a voluntary step), but policies/requirements warrant ongoing scrutiny, including from a viability perspective.

9.6.2 In **conclusion**, the plan has been adjusted since 2023 with a clear focus on community concerns, and whilst it is recognised that some concerns do remain, a priority is adopting the LPR in good time so as to avoid further sites coming forward under the presumption in favour of sustainable development (including ‘planning by appeal’). Community concerns with growth are also allayed on account of the proposed suite of development management policies, both site-specific and district-wide, and there is confidence in respect of Whole Plan Viability (and, in turn, confidence that the site allocations can deliver in a way that aligns with policy). Overall a **‘moderate or uncertain positive effect’** on the baseline is predicted.

## 9.7 Economy and employment

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

- As discussed in Section 6, the LPR represents 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, although there remains a case for additional supply.
- Site-specific considerations include:
  - Higham Way – is supported as an employment site (contrary to the 2015 Local Plan allocation), as it comprises brownfield close to Banbury town centre and train station and is subject to flood risk.
  - Canalside – will now deliver a mixed use scheme, but there remains the possibility of greater focus on employment, given flood risk. Also, there is a considerable element of existing employment land, such that there is a degree of uncertainty regarding the net increase in employment land.



- South of Chesterton / north of the A41 – the new proposed approach here, involving a comprehensive employment gateway between M40 Junction 9 and Bicester, is strongly supported from a perspective of realising local and sub-regional / regional employment and economic growth objectives.
  - Land Adjacent to Symmetry Park, North of A41, South East Bicester – will extend the employment land that was recently delivered as the first phase of the committed SE Bicester strategic urban extension (N.B. its rapid delivery serves as evidence for the high demand for employment land in this area).
  - Supporting housing growth in **the Kidlington area** is also an important consideration from an economy/employment perspective, given a location within the Oxford Knowledge Spine. The proposed allocation east of Woodstock is supported in this regard, and it is noted that this will comprise the first plan-led significant housing growth in this area for a number of years (setting aside growth under the Partial Review, which was with the objective of meeting Oxford's needs as opposed to Cherwell's). However, it is important to note the reduced housing growth strategy relative to the Draft Plan stage.
  - Also, there is a need to account for **wider objectives**, e.g. relating to regeneration / place-making and locally arising needs. This includes the objective of diversifying employment land at Bicester, ensuring that it builds a reputation as a central hub within the Ox Cam Arc, albeit it also has an important role to play in terms of warehousing / distribution, given its excellent road transport connectivity. The proposed approach is supported in this regard, although there remains a need to give ongoing consideration to comprehensive planning along the A41 corridor aimed at realising objectives including via supporting the delivery of a new southern link road.
  - There is a focus on strategic employment allocations, hence the question arises around support for **smaller employment sites**. There will be good potential for sites to come forward as windfall given suitably permissive policy, but there will likely not be significant windfall in the Oxford Green Belt. There is also a need for ongoing consideration of smaller employment sites at Bicester, to diversify the offer; however, in this regard it is recognised that strategic employment allocations at Bicester can and will be masterplanned in order to support a range of types of employment land. The Interim SA Report (2023) recommended ongoing consideration of smaller employment sites including to assist with "resilience".
  - Finally, with regards to **Heyford Park**, there are no major concerns with the new proposed approach of *not* supporting further growth. With regards to the previous proposed approach, the Interim SA Report (2023) explained: "... whilst it is not anticipated that [the proposed approach from 2023] would directly deliver any new employment land, it may be supportive of long term aspirations for sensitive development / redevelopment / refurbishment / repurposing of buildings within the airfield conservation area, including with a focus on employment floorspace..."<sup>32</sup>
  - With regards to **development management policy**, a range of policies are supportive of 'economy and employment' objectives, including those that deal with assigning policy protection to employment land. Core Policy 77: London-Oxford Airport is of note, as the airport plays an important economic role. A final key consideration is assumed developable areas within employment allocations. On one hand low developable areas can support employment areas that are attractive places to work, although on the other hand there is a need to make best use of land and maximise jobs densities.
- 9.7.2 In conclusion, whilst the equivalent appraisal in 2023 flagged a potential negative effect, it is now considered appropriate to predict a **'moderate or uncertain' positive effect** on the baseline. Having said that, it will be important to be suitably proactive in respect of supporting windfall sites, and there is also a need to give ongoing consideration to strategic planning for the Kidlington area in order to realise employment / economic growth objectives that are of clear larger-than-local significance.

<sup>32</sup> The Interim SA Report (2023) also explained: "There could feasibly be further opportunity in respect of using historic buildings for employment; however, there are significant sensitivities. It is understood (from the site promoter's submission to the Options consultation, 2021), that Heyford Park currently supports ~100 businesses, including within Creative City (which involved refurbishing six buildings). Also, the recently granted planning permission for 1,175 homes (18/00825/HYBRID) includes some new employment land. It is understood that the ratio of homes to jobs within Heyford Park will be around 1:1 once the consented scheme(s) come forward, which serves to highlight (when taken into account alongside the heritage context) the potential to foster a unique employment land offer, despite a relatively rural location."

## 9.8 Historic environment

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

- All the proposed housing **allocations** are subject to a degree of constraint, but there are not thought to be any concerns regarding in-combination impacts. The following reflects a broad order of concern:
    - East of Woodstock – is constrained on account of its proximity to Blenheim Palace World Heritage Site. However, the land in question is not thought likely to contribute significantly to setting of the Palace or its associated landscaped parklands, including mindful of the influence of road infrastructure in the area, plus there is as a small intervening patch of woodland. The firm proposal is to concentrate development in the northeast corner of the site, so as to avoid and suitably buffer a scheduled monument (also a wider area of archaeological interest), which also serves to reduce concerns regarding Blenheim Palace. The scheduled monument is a below ground feature, but a recent planning application identified the potential to enhance appreciation through public art.
    - South of Chesterton – is near adjacent to the Chesterton Conservation Area, which extends to the southern extent of the village, and the new proposal is to develop additional land to the east relative to 2023 (but avoid development directly south of Chesterton). This land to the east has some sensitivity, noting the adjacent conservation area (albeit land within the conservation area abutting the proposed allocation comprises open space / parkland, with the village's historic core located slightly further to the north). There is a historic farm within the site, which whilst not listed is shown on historic mapping), a Grade 2 listed bridge over the Gagle Brook and also mature historic field boundaries.
- More generally, there is a need to note that a Roman Road (Akeman Street) passed through Chesterton, between Cirencester and Aylesbury (this could indicate the likelihood of archaeology). However, there would be good potential to mitigate historic environment impacts through masterplanning, plus it is noted that a 63 homes scheme has recently been delivered at the southern extent of the village, and another scheme is committed. Finally, the new proposed approach is to maintain a landscape buffer between Chesterton and the small hamlet of Little Chesterton, which has a modest degree of historic character, with most of buildings visible on historic mapping, and given an association with a network of historic lanes, footpaths and field boundaries / streams / drainage channels; however, the Landscape Study (2022) does not raise any such concerns.
- South of Banbury Extension – is associated with land that gently descends to the south, towards the valley of the Sor Brook, which is valued historic landscape. However, the potential to utilise Wykham Lane as a defensible boundary means that there are few concerns regarding long-term 'creep'. A Grade II listed farmhouse adjacent to the east, a cluster of listed buildings at Wykham Farm to the south west, and another historic farm is adjacent to the south (shown on the pre-1914 OS map; now offering a farm shop). Also, the Bodicote Conservation Area is to the east (where Wykham Lane meets the high street), plus there are a number of popular footpaths in the vicinity. However, there will not be road access to Wykham Lane, and there is good potential to deliver greenspace as mitigation. In this regard the amendment to the site boundary since 2023 is strongly supported.
  - Canalside – this is a historic industrial area, with a range of Victorian industrial buildings, mixed with more modern industrial buildings, and there is one Grade II listed building (the Old Town Hall).
  - There is also support for the new proposed approach in respect of **Heyford Park**. Historic England raised limited concerns regarding the proposed allocation from 2023 but would likely have a significant concern with further growth over-and-above that proposed in 2023. There are a range of issues (also potentially opportunities), perhaps most notably in respect of the RAF Heyford Conservation Area.
  - With regards to **development management policy**, it is again the case that the primary consideration is providing strategic guidance in respect of the expectations on developers, in terms of avoiding historic environment / heritage impacts, and realising any opportunities. Also, the suite of proposed thematic district-wide policies is proposed supportive of historic environment objectives. However, these are largely generic policies as opposed to policies responding to the Cherwell-specific context and, in this regard, the Government's commitment to National Development Management policies is noted.

9.8.2 In conclusion, whilst the equivalent appraisal in 2023 flagged a potential negative effect, it is now considered appropriate to predict a **neutral effect** on the baseline, given adjustments made since the Draft Plan stage (most notably in respect of Heyford Park) and further work on site-specific policy.

## 9.9 Homes

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

- The key proposal is to set the **housing requirement** at 911 dwellings per annum (dpa) in line with a figure that reflects both Local Housing Need (LHN) and the previously agreed level of unmet need from Oxford City. This is considered a suitably proactive approach, although there remain certain arguments for higher growth, as discussed in Section 5 and 6 of this report. It should be noted that at the Draft Plan stage (2023) the proposal was to set the housing requirement at 1,293 dpa, but that was under a significantly different strategic context (see discussion in Section 5.2).
- The identified **housing supply** is 23% above the housing requirement, over the plan period as a whole, which is strongly supported, as a 'supply buffer' acts as a contingency for delivery issues, and there are certain sites in the identified supply where there are delivery risks, e.g. Canalside and NW Bicester. However, the supply buffer is lower earlier in the plan period, such that there remains a case for considering the possibility of an upward stepped housing requirement (i.e. a situation whereby the housing requirement is lower in the early years of the plan period and then commensurately higher in latter years), which would not be supported from a housing perspective (because of the urgency around providing for housing needs, including affordable housing needs). Having said this, it is recognised that if it transpires that the plan is unable to maintain a five year supply against the housing requirement in the early years of the plan period then the presumption in favour of sustainable development could be triggered, with the effect of boosting housing supply (albeit potentially in sub-optimal locations).
- In terms of the **distribution** of growth, there is support for strong alignment with the settlement hierarchy, including by directing growth to Kidlington and not supporting a new settlement.<sup>33</sup> However, reduced growth at Kidlington and Bicester (at least in the plan period) relative to the Draft Plan stage (2023) is of note, because both settlements are very well connected to Oxford (where there is acute housing need).
- **Affordable housing** needs is another matter that relates to spatial strategy, as well as to development management policy, as there can be an argument for setting the housing requirement above LHN, in order to meet affordable housing needs more fully, and there is a need to direct housing towards sites with strong development viability, as far as possible, in order to support affordable housing delivery.

Whilst the proposal in 2023 was to require 30% affordable housing across the District, the new proposed approach is a 'step up', namely: Banbury - 30%; Bicester - 30%; Kidlington - 35%; Elsewhere - 35%. Also, the proposed tenure mix is stringent: *"All qualifying developments will be expected to provide 70% of the affordable housing as social or affordable rented dwellings and 30% as other forms of affordable homes."* This new proposed approach is supported from a 'housing' perspective, although there are implications 'whole plan viability', specifically the balance between setting requirements of developers, in terms of the funds that must be directed to affordable housing and other policy asks (e.g. decarbonisation, space and accessibility standards, biodiversity net gain), and ensuring deliverable housing sites. It is noted that a 530 home scheme at NW Bicester recently gained permission at appeal despite providing for only 10% affordable housing (although this was reflective of particular site-specific issues, plus there is a claw back mechanism to secure greater affordable housing if viability improves).

- A final matter for consideration here is meeting **specialist accommodation** needs. In particular, meeting the needs of Travelling Communities (Gypsies and Travellers, and also Travelling Showpeople) is a key issue nationally. The implications of not meeting Traveller accommodation needs are wide ranging. For Travellers, poor accommodation can be a barrier to maintaining the traditional way of life, can lead to tensions with settled communities and certainly contributes to issues of relative deprivation, with Travellers tending to have poor outcomes in terms of health and wellbeing, educational attainment and a range of other indicators. Friends, Families and Travellers (FFT) is a national organisation focused on the needs of Travellers. FFT present a vision for change under four headings: Health, Hate, Accommodation and Education, and a range of other research is also presented on the website, some of which was quoted within the Interim SA Report (2023). A recent RTP1 blog on the issue of local plans "kicking the can down the road" is also of note. Finally, by way of context, a major consultation is currently underway in Kent aimed at finding sites to provide for over 500 pitches.

<sup>33</sup> With regards to the new proposal of not supporting further growth at Heyford Park, it should be noted that the Interim SA Report (2023) flagged potential support for the 'delivery model' proposed by the site promoters, aimed at low delivery risk and low risk of unforeseen cost issues, e.g. that could have a bearing on affordable housing delivery. They emphasise *"a delivery model that provides a wide range and choice of products and includes the Private Rental Model (PRM). There is a wide range and choice of market housing together with affordable homes (affordable homes are delivered by Heyford Regeneration)..."*

Focusing on Cherwell, there is not currently a need to allocate land for further pitches, but there is a need to maintain a watching brief in respect of needs and ensure a suitably permissive approach to windfall. The Interim SA Report (2023) presented a detailed discussion of 'site selection', and in respect of Policy COM 9 (Travelling Communities) recommended: *"[The policy] suggests that sites should be within 3km of town or village, but there can be good potential to deliver suitable sites in closer proximity [e.g. walking distance]."*

- 9.9.2 In conclusion, whilst the equivalent appraisal in 2023 flagged a potential negative effect, it is now considered appropriate to predict a **'moderate or uncertain' positive effect** on the baseline, given changes to the strategic context and adjustments made since the Draft Plan stage including in respect of affordable housing, plus it has now been confirmed that there is no need to allocate land to provide for Gypsy and Traveller accommodation needs.

## 9.10 Land, soils and resources

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

- Supporting housing growth at **Canalside**, as well as an intensification of employment uses, is clearly supported, in terms of making the best use of brownfield land so as to reduce pressure on greenfield.
- In this respect, the proposed change to the **NW Bicester** strategic allocation is of note, in that the new proposal is to safeguard extensive productive agricultural land (south of Bucknell) as greenspace.
- The proposed greenfield allocation at **Banbury** is a rare example of a site that has been surveyed in order to establish agricultural land quality with confidence. The land is found to comprise Grade 2 quality land, i.e. land that comfortably falls within the bracket of 'best and most versatile' (BMV; which the NPPF defines as land that is Grade 1, Grade 2 or Grade 3a quality). It is noted that the land in question comprises notably higher quality agricultural land than is the case for the committed site to the north. This presumably reflects the association of the new proposed allocation with the valley of the Sor Brook.
- At **Bicester** there is overall lower agricultural land quality, particularly to the south and southeast of the town. None of the proposed allocations have been surveyed in detail, but are quite unlikely to comprise BMV land, on the basis of the nationally available provisional (i.e. low resolution and low accuracy) dataset and going by land that has been surveyed in detail around the town.
- With regards to the proposed allocation **east of Woodstock**, the adjacent committed site has been surveyed in detail and found to comprise Grade 3b quality land. The nationally available provisional dataset serves to suggest that the proposed allocation comprises 'Grade 3' quality land, which in practice may or may not be land that is BMV (the nationally available dataset does not split Grades 3a and 3b).
- At **Heyford Park** the new proposed approach is potentially supported from an agricultural land perspective (the national dataset shows some Grade 2 quality land in the vicinity) and another consideration is the need to avoid sterilisation of minerals resources that could potentially be viably extracted, with Heyford Park intersecting a Minerals Safeguarding Area, as understood from the Oxfordshire Minerals and Waste Local Plan (2017). Safeguarding is not absolute, but the County Council raised an objection (to the previous proposed approach) through the consultation in 2023.
- With regards to **development management policy**, Policy CSD 6: Renewable Energy is of note, which identifies the need to avoid loss of BMV agricultural land as a key criterion when considering planning applications for new solar farms. In this respect, there is a need to consider that there is quite notable broad variation in agricultural land quality across the District, although areas of lower quality agricultural land can tend to be associated with sensitivities in other respects, e.g. biodiversity.

Finally, it is noted that Natural England commented in 2023:

*"Several large site allocations for residential development are put forward in this plan... which are located on greenfield sites with the potential for significant loss of Best and Most Versatile Agricultural Land. To support plan allocations (and subsequent planning applications) sites (over 5ha agricultural land) should have a site-specific Soils Management Plan informed by a detailed Agricultural Land Classification (ALC) and soil resource survey..."*

This request can be questioned in the context of the mitigation hierarchy (i.e. the importance of avoiding impacts in the first place, ahead of mitigation) and given little if any potential to mitigate impacts in respect of agricultural land lost within development site red line boundaries.



- 9.10.2 In conclusion, there is inevitably release significant areas of greenfield land that is currently in productive use for agriculture, reflecting the need to identify a supply of 'deliverable' and 'developable' sites for the plan period as a whole (NPPF paragraph 69). The District is not highly constrained in agricultural land terms, and the proposed lower growth strategy for Banbury is noted, but overall there will likely be a significant loss of BMV land, hence there is a need to predict a **'moderate or uncertain' negative effect**.

## 9.11 Landscape

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

- **Landscape sensitivity** assessment has been a key input to site selection, as discussed in Section 5.4.
- At **Banbury**, there is quite a high prevalence of landscape sensitivity around the settlement edge (see the 'points of the compass' discussion in Section 5.4), but efforts have clearly been made to direct growth away from the most sensitive areas. The landscape study assigns 'low-moderate' sensitivity to the proposed allocation to the south of the town; however, the site is notably associated with the valley of the Sor Brook. Furthermore, it will extend an existing committed scheme, which currently is set to be quite well-contained at its southern boundary by a tree belt. Having said this, the modifications made to the site boundary since 2023 are strongly supported (see Figure 9.1), and there is considered to be little if any risk of further development creep / sprawl.
- **Bicester** is generally associated with lower landscape sensitivity, but there is significant variation around the perimeter of the town, as discussed in Section 6. The proposed extension to the existing NW Bicester allocation is broadly supported, from a landscape perspective, as the effect will be to secure a long term defensible landscape gap between Bicester and the village of Bucknell, and the potential for a defensible boundary can now be envisaged, as discussed above. Also, there are fairly limited sensitivities associated with land to the south of Chesterton, with the Landscape Study (2022) assigning 'low-medium' sensitivity. However, the new proposed development parcel southeast of Chesterton is associated with some sensitivities, as discussed above under the historic environment topic heading. Finally, the new proposed approach of avoiding further expansion to the southeast is supported from a landscape perspective, as discussed in Section 6, particularly noting the role of Blackthorn Hill with the expansive and sensitive landscape of the Upper Ray meadows beyond.
- At **Kidlington** the proposed allocation is not covered by the Landscape Study (2022) but has been examined by studies completed in the past, specifically to inform the Partial Review (2020). Overall, the site is considered to have relatively limited landscape sensitivity, as relatively flat sites benefiting from quite strong landscape containment, in that it is bounded to the west by the Woodstock urban edge (a site under construction) and by roads on the other sides (along with thick hedgerows / tree belts). Also, the proposal is to deliver a very significant amount of new strategic greenspace within the site. The site will need to be delivered at a low density, which can be questioned from a landscape ('sprawl') perspective, but there is ongoing work to explore masterplanning options.
- With regards to **Heyford Park**, the Landscape Study (2022) assigns low-medium sensitivity, but there are a number of inherent issues, given a raised plateau landscape between the valleys of the River Cherwell to the west and the River Ray to the east, hence there is inherently a degree of concern regarding development 'spilling' down-hill over time. Any further growth must be comprehensive and undertaken with a long term perspective, hence there is support for the adjusted strategy since 2023. The appraisal in 2023 also noted: *"A key issue is the landscape gap to the Lower Heyford Road."*
- Finally, with regards to the **employment allocations**, there can be inherent landscape sensitivities; however, the greenfield allocations are mostly closely associated with major road corridors, and to the west of Bicester there is a need to recall the context of the recently permitted Siemens site. With regards to the Graven Hill site, there is merit in that the site should be well contained by flood risk, biodiversity and historic environment sensitivities, as discussed in Section 5.4.
- With regards to **development management policy**, an important question is in respect of the degree to which masterplanning parameters are set though the local plan, including with a view to providing confidence that landscape impacts will be minimised, versus allowing flexibility for masterplanning at the planning application stage, with a view to avoiding delivery issues. In this regard it is noted that a high level concept plan has now been prepared for South of Banbury, and there is also clarity regarding the extent of the proposed Strategic Gap south of Bucknell within the North West Bicester allocation.

- 9.11.2 In conclusion, taking account of site-specific policy and work that has been undertaken in respect of Strategic Gaps it is now considered appropriate to predict a **'moderate or uncertain' positive effect**.

## 9.12 Transport

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

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

- Beginning with the matter of **broad strategy**, the discussion in Section 6 sets out broad support for the preferred growth scenario in terms of its alignment with strategic transport objectives. In particular, there is broad support for a strategy whereby objectively assessed development needs are proactively met through local plans, as well as support for a strategy that includes a strong focus on directing new homes to strategic development sites. Supporting growth at Bicester over-and-above Banbury is supported, for the reasons set out above under the 'air quality' heading, and there is also support for growth at Kidlington from a transport perspective. There is also strong support for resisting further growth at Heyford Park that could prove to be piecemeal, as discussed in Section 5.4, albeit there are certain tensions and uncertainties, e.g. in respect of the previously proposed approach the Interim SA Report (2023) suggested: "... the effect of growth could be to support achievement of a long term vision for Heyford Park as a service village with a strong degree of self-containment."
- Further **site specific comments** are as follows:
  - South of Banbury – will extend an existing committed strategic allocation, which had been masterplanned to ensure good access to a distributor road and a local centre. The western part of the site links to a main road corridor and has "reasonable bus connectivity", according to the Transport Assessment (2022), but this part of the site will now be delivered as greenspace.
  - South of Chesterton – is very well located on a strategic transport corridor, but a key issue will be securing good walking and cycling connectivity to Bicester town centre and rail station. As discussed, there is a need to confirm implications for the change of strategy for the A41 corridor vision (but there is confidence that an employment focus can and likely will support delivery of a southern link road).
  - East of Woodstock – is very strongly supported from a transport perspective, as has been discussed, albeit there is a need for further work around the ability to walk from the site to a primary school.
- With regards to **development management policy**, this is clearly something that is a considerable focus of the current consultation document. Just taking Banbury as an example, core policies deal with "delivery of strategic transport schemes", "safeguarding of land for strategic transport schemes" and "development in the vicinity of Banbury Rail Station", whilst there is a development management policy dealing specifically with the matter of "Banbury Inner Relief Road and Hennef Way".

9.12.2 In conclusion, whilst the appraisal in Section 6 predicts a neutral effect for the proposed growth scenario, having taken account of area-wide and site-specific policy it is possible to predict a **moderate or uncertain positive effect** on the baseline in respect of the LPR as a whole, recalling that the baseline situation is one whereby there is problematic unplanned growth in Cherwell and elsewhere within a sub-region where aligning growth with strategic transport objectives is of paramount importance. There does remain an element of uncertainty given the age of the Transport Assessment (2022) and much ongoing work to explore transport issues and opportunities (e.g. through Local Cycling and Walking Infrastructure Plans, LCWIPs) but this is not unusual in the national context and certainly not in the Oxfordshire context.

## 9.13 Water

- 9.13.1 With regards to the **spatial strategy** / package of proposed allocations, there is little potential to comment further, over-and-above the discussion presented in Section 6. There are no clear reasons to suggest any significant concerns, in respect of water resources or water quality, but there is a need to gather further evidence, including through further consultation with the Environment Agency and the water company.
- 9.13.2 With regards to thematic core / **development management policy**, the current consultation document explains: "*In considering development proposals, we will seek to reduce the impact of development on the water environment, maintain water quality, ensure adequate water resources and promote sustainability in water use. Some development can also remediate contaminated land which may be having an adverse impact on controlled water and human health.*"

9.13.3 Also, the proposal is to require that all new homes meet the water efficiency standard of a maximum of 110 litres per person per day (lpppd). This is the 'optional' higher standard allowed by Building Regulations and is common practice. Some authorities nationally seek to justify a more stringent standard of 90 lpppd (e.g. Uttlesford), but there are significant development viability implications, and it is difficult to suggest what other policy area might be 'flexed' in order to create viability headroom to then allow for this.

9.13.4 In conclusion, as per the discussion in Section 6, it is appropriate to predict a **neutral effect**.

## 9.14 Overall conclusions on the LPR

9.14.1 Having taken 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 in Section 6 (to ensure a level playing field) 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 in Section 6.

9.14.2 There will be the potential to make adjustments to the plan through the forthcoming examination in public, and a small number of recommendations are made. However, it is inherently difficult to confidently make recommendations because actioning them will have implications that are difficult to foresee and account for here. For example, whilst it would be easy to recommend further policy stringency in respect of affordable housing, this would have cost/viability implications such that there could be a need to accept trade-offs in respect of wider objectives (e.g. net zero or biodiversity net gain). Equally, whilst it is easy to suggest the possibility of further site-specific policy, this takes time and resources, and there is always a risk of being overly prescriptive, such that there is reduced flexibility at the development management stage, potentially impacting delivery.

9.14.3 Finally, it should be noted that the current version of the Local Plan was prepared taking account of the appraisal presented within Section 9 of the Interim SA Report (2023). There is no requirement for SA to be iterative in this way, but it helps to demonstrate a robust and sound plan-making process.

**Table 9.1:** Comparison of conclusions reached for Scenario 1 (Section 6) and the LPR as a whole (Section 9)

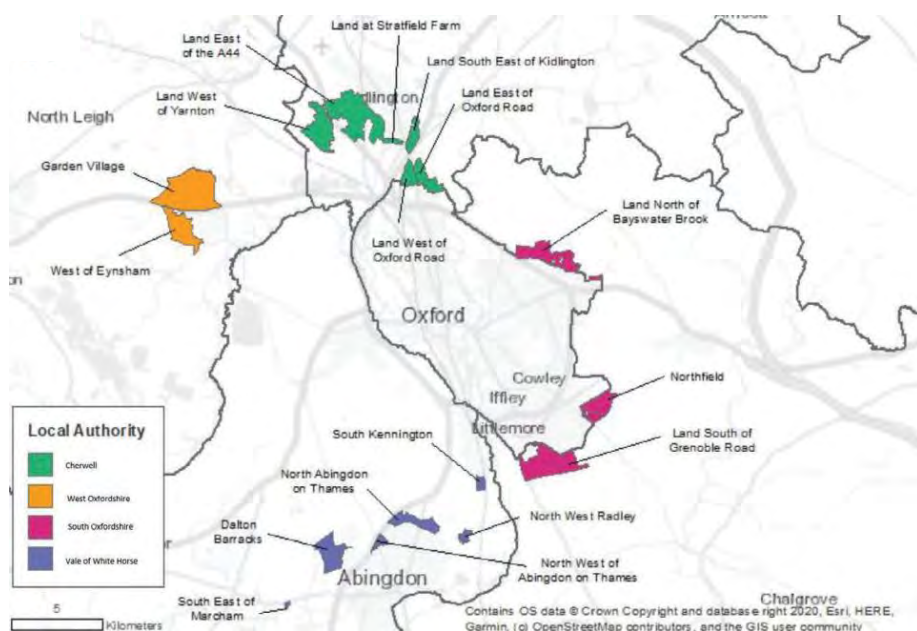
Topic	Conclusion on Scenario 1	Conclusion on the LPR as a whole
Air / env quality		
Biodiversity		
Climate change adaptation		
Climate change mitigation		
Communities		
Economy		
Historic environment		
Homes		
Land		
Landscape		
Transport		
Water		

## Cumulative effects

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

- **Housing needs** – all local plans must consider known, likely or potential unmet needs from closely linked neighbouring areas. The proposed housing requirement reflects a proactive approach to providing for Oxford's unmet needs. However, and as discussed, Oxford City's next steps in respect of their local plan are not known at the current time, hence there is a need to maintain a watching brief.
- **The economy** – there is a need to ensure that employment land is provided in line with regional and national objectives. In this light, the LPR focus on supporting strategic employment growth at Bicester is supported, as the town is closely associated with the Oxfordshire Knowledge Spine and the Ox Cam Partnership area. This report has discussed the need for ongoing consideration of a long-term growth strategy for the Kidlington area, including Oxford City Airport (which performs a key regional function), and further warehousing and distribution at Banbury also warrants ongoing consideration.
- **Transport corridors** – many of the key strategic opportunities around growth facilitating new or upgraded strategic transport infrastructure are 'local', rather than cross-boundary, e.g. aspirations for the A41 corridor at Bicester, and improved sustainable transport connectivity at Upper Heyford. However, there are also a range of cross-border considerations, e.g. bus services linking growth locations to Oxford, and A44 corridor considerations in respect of growth at Woodstock.
- **Oxford Meadows SAC** – the possibility of in-combination impacts is a focus of a stand-alone Habitats Regulations Assessment (HRA), the conclusion reached that there are no significant concerns.
- **Landscape scale nature recovery** – this is a key larger than local consideration, with a particular need to focus attention on: A) the River Cherwell / Oxford Canal corridor; and B) the Upper Ray Meadows (which link to the Bernwood Forest). Both broad landscapes are of Ox-Cam wide, and hence arguably national, significance. Strategic growth associated with, or nearby to, these broad landscapes could lead to funds being directed towards the realisation of strategic ambitions. A Local Nature Recovery Strategy (LNRS) is forthcoming, under the Environment Act 2021, but steps must be taken in the interim.
- **Green Belt** – the LPR does not give rise to concerns around the integrity of the Oxford Green Belt.
- **Decarbonisation** – 'Bicester Eco-town' has been discussed nationally for at least a decade. In turn, there is a strong argument for a national exemplar strategy. One matter for consideration could be the possibility of seeking to deliver a sub-regional modern methods of construction (MMC) facility.
- **Agricultural land** – self-sufficiency of food projection is increasingly a key national consideration.
- **Water** – is a key larger than local consideration, e.g. noting recent issues around capacity at Oxford Sewage Treatment Works. A 'Phase 1' Oxfordshire [study](#) was completed in 2021.

**Figure 9.2: Existing Oxford unmet need cross-border allocations (from the Oxford Local Plan 2040)**





## **Part 3: What are the next steps?**

## 10 Plan finalisation

- 10.1.1 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. The Council will also submit the SA Report.
- 10.1.2 At examination one or more Government-appointed Inspector(s) will consider representations before identifying modifications necessary for soundness. Modifications will then be prepared (alongside SA if necessary) and subjected to consultation (alongside an SA Report Addendum if necessary).
- 10.1.3 Once found to be 'sound' the Local Plan Review will be adopted. At the time of adoption a 'Statement' must be published that sets out (amongst other things) "the measures decided concerning monitoring".

## 11 Monitoring

- 11.1.1 Within the SA Report the requirement is to present "measures envisaged concerning monitoring".
- 11.1.2 The following are suggestions / ideas for monitoring, although it is recognised that, in practice, there is a need to balance ambition with time and resource implications:
  - Biodiversity – there will be a need to establish a regime for ensuring that decision making in respect of biodiversity net gain as part of planning applications is undertaken under a strategic spatial framework – informed by the forthcoming Local Nature Recovery Strategy – and then monitor effectiveness.
  - Communities – there could be merit in targeted monitoring of growth/change across the cluster of Green Belt allocations. For example, incidences of residents commuting to work by active or public transport.
  - Community infrastructure – Wokingham Borough is commended as an authority that sets out very clear information on progress in respect of delivering infrastructure at strategic growth locations (see [here](#)).
  - Climate change mitigation – monitoring should focus on clarity. This can be a confusing policy area, but it is very important that the interested public can understand / engage and scrutinise applications.
  - Climate change adaptation – a focus on monitoring development sites intersecting a surface water flood zone could be considered but would likely prove challenging. Regardless, there is a need for clarity on the different forms of flood risk.
  - Economy and employment – the nature of need/demand for office floorspace and industrial/logistics floorspace changes very quickly. Regular monitoring of delivery would assist with future assessments.
  - Historic environment – it can be difficult to know what monitoring indicators are most appropriate to apply. What is quite typical is to monitor the number of assets on the Heritage at Risk register, but this will not give a good picture of the local plans impacts or contextual changes to the historic environment.
  - Homes – this topic is already a focus of monitoring, but additional indicators could be explored, for example with figures broken down further by area and by housing type and tenure. Also, there is an increasing focus on tenure split for affordable housing, which might feed into monitoring. A focus on Gypsy and Traveller accommodation could also serve to inform future needs assessments.
  - Transport – there is a clear need for targeted detailed monitoring. As well as road traffic and air quality, there is a need for improved data on bus patronage and use of cycle routes. Also, understanding of strategic transport infrastructure issues and opportunities changes significantly over time (with work led by SCC), hence there is a need to consider local plan implications on an ongoing basis.
  - Water – there is a need for monitoring of the situation regarding wastewater treatment capacity and potentially also wider water quality. Also, there is a case for monitoring water efficiency standards.

# Appendix I: Regulatory requirements

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

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

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

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

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level	
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'baseline'?</i>
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal	
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What's the scope of the SA?</i>
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
		i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]



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

Regulatory requirement	Information presented in this report
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Section 2 ('What's the plan seeking to achieve') presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report. The outcome of scoping was an 'SA framework', which is presented within Section 3 in an adjusted form.
c) The environmental characteristics of areas likely to be significantly affected;	
d) ... environmental problems which are relevant... ...areas of a particular environmental importance...;	
e) The environmental protection objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The Scoping Report presented a detailed context review and explained how key messages from this (and baseline review) were then refined in order to establish an 'SA framework', which is presented within Section 3. With regards to explaining " <i>how... considerations have been taken into account</i> ", Section 7 explains 'reasons for supporting the preferred approach', i.e. how/why the preferred approach is justified in-light of alternatives appraisal.
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Section 6 presents alternatives appraisal findings in respect of reasonable growth scenarios, whilst Section 9 presents an appraisal of the local plan as a whole. All appraisal work naturally involved giving consideration to the SA scope and the potential for various effect characteristics/dimensions.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Section 9 presents recommendations.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Sections 4 and 5 deal with 'reasons for selecting the alternatives dealt with', with an explanation of reasons for focusing on growth scenarios / certain growth scenarios. Section 7 explains 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of the alternatives (growth scenarios) appraisal. Methodology is discussed at various places, ahead of presenting appraisal findings.
i) ... measures envisaged concerning monitoring;	Section 11 presents this information.
j) a non-technical summary... under the above headings	The NTS is a separate document.
The SA Report must be published alongside the draft plan, in-line with the following regulations	
Authorities... and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	This SA Report is published alongside the Proposed Pre-Submission Local Plan in order to inform representations and plan finalisation.
The SA Report must be taken into account, alongside consultation responses, when finalising the plan.	
The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	This SA Report will be taken into account when finalising the plan for publication (see Section 10). Also, it should be noted that an Interim SA Report was published alongside the Draft Local Plan in 2023. It presented the information required of the SA Report.