

Sustainability Appraisal (SA) of the Cherwell Local Plan Review

Interim SA Report

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Quality information

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Non-technical Summary

Introduction

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Cherwell Local Plan Review (“the plan”). Once in place, the plan will establish a spatial strategy for growth, allocate sites to deliver the strategy and establish development management policies to guide decisions on planning applications.

The plan is currently at an early stage of preparation, with an “Options Paper” published for consultation. This Interim SA Report is published in order to inform the consultation and subsequent work to prepare a draft plan.

Specifically, the table below introduces the information presented in this Interim SA (ISA) Report.

Aspect of the Options Paper		Information presented within this ISA Report
Thematic policy	The Paper presents options under 15 thematic headings.	A narrative discussion is presented under the ‘SA framework’, which essentially comprises a list of 20 sustainability topic headings. Under each of the SA framework headings, the aim is to present an informal discussion of options likely to give rise to significant effects.
Place-specific strategy/policy	The Paper presents sets of options (ranging from one set to six sets) for each of the District’s six key ‘places’.	An appraisal ‘matrix’ is presented for each of six places, with each matrix presenting an appraisal of mutually exclusive (i.e. ‘alternative’) options. In each case, the alternatives are: 1) lower growth; and 2) higher growth.

Further discussion of ‘scoping’ the nature of appraisal work to present within this ISA Report is presented within the main body of the report, below. A key message is that SA must focus on appraising “the plan and reasonable alternatives”,¹ with appraisal findings focused only on effects likely to be ‘significant’.

Appraisal findings

Summary appraisal findings are presented below under six headings:

- Thematic policy
- Banbury
- Bicester
- Kidlington and surrounding villages
- Upper Heyford
- Rural area

Thematic policy

Section 2 of this report presents an informal discussion options under each of the headings that together comprise the SA framework. The table below presents the conclusion of each narrative.

SA topic	Appraisal conclusions in respect of the proposed thematic policy options
Air and wider environmental quality	Proposed policy options in respect of digital infrastructure are strongly supported, given the potential reduce the need to travel. Certain options in respect of employment land are supported, whilst others give rise to a concern, particularly focusing “mostly on previously developed land, including in less sustainable locations”. There is a need to secure employment growth in locations where the effect will not be to increase HGV and light goods vehicle traffic along road routes associated with problematic air quality.

¹ Regulation 12(2) of the Environmental Assessment of Plans and Programmes (SEA) Regulations [2004]

SA topic	Appraisal conclusions in respect of the proposed thematic policy options
Biodiversity	<p>The proposed biodiversity options are supported, as they respond to the current national priorities (also sub-regional and Oxfordshire-wide) on taking a strategic, spatially targeted approach to planning for biodiversity net gain (as opposed to simply leaving matters to the planning application stage).</p> <p>The options that propose an emphasis on planning for natural capital and ecosystem services are also supported, although there is a need to avoid unduly distracting from efforts to plan effectively for biodiversity net gain, given that approaches and methods may take some time to bed in.</p>
Climate change mitigation	<p>The proposal to establish “meeting the challenge of climate change” as a key theme to guide the plan is supported, although there is a need to ensure clarity of message, and a clear focus on priority issues, namely per capita transport emissions and built environment emissions within new communities.</p> <p>The proposal to consider setting local sustainable design and construction policy is supported, although there is a need to ensure clarity of message, avoiding an overly complicated local policy environment.</p> <p>The option of allocating land for renewable energy is highly proactive, in line with the 2030 net zero target imperative, but could prove challenging to implement, and there is a need to also ensure a focus on criteria-based policy (particularly with a degree of spatial targeting, e.g. broad areas of search) in support of community-led initiatives.</p>
Climate change adaptation	<p>The proposal to establish “meeting the challenge of climate change” as a key theme to guide the plan is supported, although there is a need to ensure clarity of message, and a clear focus on priority issues, potentially flood risk, overheating, water resources and taking a natural capital approach to planning.</p> <p>There is evidence that climate change adaptation is being considered from the outset, as part of wide-ranging policy formulation, and this will need to continue to be the case moving forward.</p>
Communities	<p>The Options Paper proposes a notably proactive approach in respect of planning for children’s play space and outdoor sports provision, responding to latest evidence and understanding.</p> <p>Similarly, the Options Paper recognises the crucial importance of “reimagining” town centres, although there is clearly more work to be undertaken ahead of determining what this means in practice.</p> <p>A wide range of other proposed policy options perform well, from a ‘communities’ perspective, and few potential tensions are highlighted, although it is recognised that ‘larger than local’ economic growth objectives could potentially lead to a tension with local objectives around securing good employment.</p>
Crime	Options which promote the adoption of ‘place shaping principles’, particularly in relation to infrastructure delivery, town centres, children’s play and sports provision are supported.
Digital infrastructure	Proposed policy options in respect of digital infrastructure are strongly supported
Education and skills	The proposed Local Plan Review themes should enable a positive approach to planning for education and skills through the Local Plan, although there is a need for further work to identify specific priorities.
Employment	The Options Paper is clear regarding the difficult choices that will need to be made around employment land strategy, which is strongly supported. There will undoubtedly be a need to balance sub-regional and national economic growth objectives with a range of local objectives.
Economic growth	
Flood risk	<p>The proposed focus on a natural capital approach is strongly supported.</p> <p>National policy in respect of directing sensitive uses away from flood risk zones and considering the downstream implications of development in flood plains, is currently being updated, hence there will be a need to respond to the latest policy and guidance through the next stages of the Local Plan Review.</p>

SA topic	Appraisal conclusions in respect of the proposed thematic policy options
Health	<p>A wide range of the proposed policy options lead to positive implications for the achievement of health and wellbeing objectives.</p> <p>In particular housing focused options that would ensure access to high-quality housing for all are supported, as is the proposal to adjust the IDP methodology to ensure that decisions on infrastructure are made with a clear understanding of implications for healthy place shaping.</p> <p>Options supportive of reimagining town centres are also supported, from a health perspective, given retail trends and increased value attributed to leisure and recreation space following the C-19 pandemic.</p> <p>Certain sport and recreation options are supported, while others give rise to a concern, in particular “continuing the current policy approach of securing new pitch provision as part of strategic development”.</p> <p>The options requiring ambitious targets for sustainable construction and requiring major development to include environmental net-gain are also supported.</p>
Historic environment	<p>Options in respect of town centres, employment land and sustainable construction have implications for the historic environment, which will need detailed consideration.</p> <p>There is clearly much potential to take an integrated approach to planning for the historic environment alongside natural capital at landscape scales, including at the scale of the sensitive river valleys, which are associated with historic settlement and important transport corridors.</p>
Homes	<p>Options that would see increased affordable housing and housing quality requirements are broadly supported, on the basis of the available evidence; however, moving forward, there will be a need to take careful account of the latest technical evidence (also Government policy) and carefully consider implications for whole plan viability, noting the need to also support high environmental standards.</p>
Land and soils	<p>Employment land spatial strategy could well have significant implications for loss of best and most versatile agricultural land, noting that agricultural land quality varies significantly across the District.</p> <p>There is also strong support for housing within town centres, and wider urban areas, from a perspective of wishing to minimise pressure on the agricultural land resource.</p>
Landscape	<p>There is much potential to realise landscape objectives as part of an integrated strategy that takes account of wide-ranging objectives, including biodiversity, heritage and other wide-ranging natural capital. Cherwell is considered well suited to an integrated strategy of this nature, recognising the potential to identify large-scale distinctive landscape character areas, for example the Cherwell valley.</p> <p>Employment land strategy has clear implications for landscape objectives, including because of locational factors (e.g. proximity to transport routes) and the demand for warehouses, and renewable energy strategy also potentially has implications.</p>
Poverty, disadvantage and social exclusion	<p>A wide range of policy options could lead to effects. The great majority of policy options presented within the Options Paper could lead to positive effects, perhaps most notably those around housing and town centres, although certain options give rise to a degree of concern, notably focusing employment land “mostly on previously developed land, including in less sustainable locations”.</p>
Transport	<p>Employment must be in accessible locations, as far as possible, and in locations where the effect will not be to increase traffic (including HGVs) on problematic parts of the road network.</p> <p>There is a need to carefully consider the movement and transport implications of changing strategy for town centres, recognising that these tend to be the most accessible parts of the District.</p> <p>A positive approach to enhancing digital infrastructure is strongly supported, from a transport perspective, given the potential to capitalise on recent home working trends.</p> <p>A change in emphasis as part of infrastructure delivery planning, to ensure that healthy place-shaping is a priority, is potentially supported from a transport perspective.</p>
Waste	<p>The option of setting design and construction standards above those required by Central Government is supported, in addition to the option to focus employment development on previously developed land.</p>
Water	<p>The Options Paper has limited implications for water resources or water quality, given the current available evidence, hence this will need to be a focus of further detailed work ahead of preparing a draft plan for consultation.</p>

Banbury

Section 3 of this report presents an appraisal of two early, high-level alternatives for Banbury:

- Option 1 (**lower growth**) – would still involve housing growth in the plan period, in addition to that which is already committed. Given that Banbury is one of the largest settlements, this could include non-strategic urban extensions together with urban infill or other small sites. A lower growth strategy could also mean aiming to restrict housing growth in the town centre, in order to prioritise and protect other town centre uses. It could translate into a reduced level of housing at Banbury Canalside and other larger town centre or edge of centre sites.
- Option 2 (**higher growth**) – would likely involve one or more strategic urban extensions and/or a new settlement closely linked to the town. A higher housing growth strategy could also translate as support for changes use to residential within the town centre (e.g. higher densities) and predominantly housing focused schemes at Banbury Canalside or other larger town centre and edge of centre sites.

The appraisal conclusion is as follows:

Option 1 (lower growth) is preferable in respect of certain environmental topics, where Banbury is relatively constrained, or faces particular growth-related issues. Specifically, Option 1 is judged to be preferable in respect of flood risk, historic environment, 'land and soils' and landscape objectives. As for Option 2 (higher growth), this is supported in respect of topics where there is an opportunity for growth to support investment in infrastructure (particularly transport and community infrastructure, but also low carbon) and/or support mixed use strategic schemes, to include employment land. However, it is recognised that the potential for higher growth to achieve 'planning gain' is highly uncertain at this very early stage in the plan-making process.

Bicester

Section 4 of this report presents an appraisal of two early, high-level alternatives for Bicester:

- Option 1 (**lower growth**) – could still involve some housing growth in the plan period, above that which is already committed to 2031. As the District's second largest settlement and given the town's strategic location within the Oxford to Cambridge (Ox Cam) Arc, lower growth might include one or more non-strategic urban extensions (or the release of further land associated with one current sites). A lower growth strategy could also mean aiming to restrict housing growth in and around the town centre (see discussion above, under Banbury).
- Option 2 (**higher growth**) – would likely involve strategic urban extensions and/or a new settlement closely linked to the town, in addition to schemes already committed or identified within the current Local Plan. A higher housing growth strategy could also translate into higher town centre housing growth (discussed above, under Banbury) and potentially growth to support strategic community/cultural facilities and additional economic development.

The appraisal conclusion is as follows:

Option 1 (lower growth) is preferable in respect of certain environmental topics, where Bicester is relatively constrained, or faces particular growth-related issues. Specifically, Option 1 is judged to be preferable in respect of biodiversity and the historic environment. As for Option 2 (higher growth), this is supported in respect of topics where there is an opportunity for growth to bring support investment in infrastructure (notably transport related, but also low carbon); however, it is recognised that the potential for higher growth to achieve 'planning gain' is highly uncertain at this early stage.

Kidlington and surrounding villages

Section 5 of this report presents an appraisal of two early, high-level alternatives for Kidlington:

- Option 1 (**lower growth**) – would involve limited housing growth, given the location within the Green Belt and the level of committed growth,² however, there could be a need to support continued employment growth, given the existing employment cluster and Kidlington's strategic location within the Oxford Knowledge Spine.
- Option 2 (**higher growth**) – would likely involve some limited additional housing growth (e.g. infill), but the focus (it is assumed, for the purposes of this appraisal) would be an added emphasis on employment growth, to include Green Belt release. There could also be steps taken to expand Kidlington village centre and/or deliver new strategic green infrastructure, which would likely include enabling housing development.

² The Cherwell Local Plan Partial Review (2020) directs 4,400 homes across North Oxford, Kidlington, Begbrooke and Yarnton.

The appraisal conclusion is as follows:

Option 1 (lower growth) is preferable in respect of certain environmental topics, where the Kidlington area is relatively constrained, or faces particular growth-related issues. Specifically, Option 1 is judged to be preferable in respect of biodiversity, 'land and soils' and landscape objectives. As for Option 2 (higher growth (employment focused)), this is supported in respect of 'economy and employment' objectives, because there is a well understood employment/economic growth opportunity.

Upper Heyford

Section 6 of this report presents an appraisal of two early, high-level alternatives for Upper Heyford:

- Option 1 (**lower growth**) – allocate further land for housing and employment at Heyford Park, beyond that which is already planned for within the current plan period (2011-2031)..
- Option 2 (**higher growth**) – limit further development beyond that which is already planned for within the current plan period (2011-2031).

The appraisal conclusion is as follows:

Option 1 is preferable in respect of certain environmental topics, where Upper Heyford is relatively constrained, or faces particular growth-related issues. Specifically, Option 1 is judged to be preferable in respect of climate change mitigation, historic environment 'land and soils' and landscape objectives. As for Option 2, this is supported in respect of 'economy and employment' objectives, because there is a growth opportunity, although significance is currently uncertain.

Rural area

Section 7 of this report presents an appraisal of two early, high-level alternatives for the rural area:

- Option 1 (**lower growth**) – would involve a continuation of the current strategy, which stems from the adopted Core Strategy (2015), with a new emphasis on ensuring that all villages / village clusters see some housing growth over the plan period in-line with housing needs (as far as these can be quantified).
- Option 2 (**higher growth**) – would involve a step-change in growth in the rural area, relative to the trend over recent years. The Local Plan could include allocations at those villages where there is considered to be a particular need (e.g. due to a lack of recent housing growth, or a need to support village services and facilities) or opportunity (e.g. due to a good level of services/facilities, or good connectivity to a higher order centre), or where there are sites that stand-out as performing strongly (including from a deliverability perspective).

The appraisal conclusion is as follows:

Option 1 is preferable in respect of certain environmental topics, where the rural area is relatively constrained, or faces particular growth-related issues. Specifically, Option 1 is judged to be preferable in respect of air quality, climate change mitigation, the historic environment and transport (with several of these issues are inter-related, namely issues relating to air quality, climate change mitigation and transport). As for Option 2, this is supported in respect of 'housing' objectives, primarily because significant rural housing needs are thought likely to exist.

Next steps

The next step will be to define and appraise reasonable alternative growth scenarios, defined as alternative "land supply" options, where each option involves a supply of land to meet objectively identified needs over the plan period. Defining growth scenarios will involve a step-wise process, to include exploring broad distribution options (building on the appraisals presented in this report), individual site options (as far as possible, recognising these will be numerous) and options for particular settlements / sub-areas (this is typically a key step). It is anticipated that work to define growth scenarios will be influenced by the Oxfordshire Plan 2050, and potentially also the Ox Cam Arc Spatial Framework. However, there is a need to be mindful that either the Oxfordshire Plan or the Arc Spatial Framework could subject to delays, in which case the Local Plan Review would still need to be progressed.

Subsequent to the appraisal of reasonable growth scenarios, the Council will be in a position to prepare a draft ("Preferred Options") version of the Local Plan, and publish it for consultation. Following the consultation, there will be further work to refine growth scenarios, prior to the Council finalising the Local Plan for publication under Regulation 19 of the Local Planning Regulations. The formally required SA Report will be published alongside, presenting all of the information required by the SEA Regulations. The Local Plan and SA Report will then be submitted for examination.

1 Introduction

1.1 Background

- 1.1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Cherwell Local Plan Review (“the plan”). Once in place, the plan will set a spatial strategy for growth, allocate sites to deliver the strategy and establish development management policies to guide decisions on planning applications. The Local Plan is being prepared alongside the emerging Oxfordshire Plan 2050.
- 1.1.2 SA is a means of exploring the likely effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. SA of Local Plans is a legal requirement.³
- 1.1.3 The plan is currently at an early stage of preparation, with an “Options Paper” published for consultation. This Interim SA Report is published in order to inform the consultation and subsequent plan-making.

1.2 SA explained

- 1.2.1 It is a requirement that SA is undertaken in-line with the Environmental Assessment of Plans and Programmes Regulations 2004. In-line with the Regulations, a report (known as **the SA Report**) must be published for consultation alongside the draft plan that essentially ‘identifies, describes and evaluates’ the likely significant effects of implementing ‘the plan, and reasonable alternatives’. The report must then be considered, alongside consultation responses, when finalising the plan.
- 1.2.2 More specifically, the SA Report must answer **three questions** -
- What has Plan-making / SA involved up to this point?
 - including with regards to consideration of ‘reasonable alternatives’
 - What are the SA findings at this stage?
 - i.e. in relation to the draft plan
 - What are next steps?

1.3 This Interim SA Report

- 1.3.1 Currently the Council is not consulting on a draft plan; rather, the Council is consulting on ‘options’, having previously consulted on ‘issues’ in 2020. There is no strict requirement for SA work at this early stage in the plan-making process; nonetheless, this ‘Interim’ SA Report is produced with the intention of informing plan-making, and presenting stakeholders with insights in respect of the sustainability implications of the various options presented the consultation document.

Structure of this report

- 1.3.2 The structure of this report responds to that of the consultation document, as follows:
- Section 2 – deals with the options presented for **thematic / district-wide policy issues**.
 - Section 3 – deals with the options presented for **Banbury**.
 - Section 4 – deals with the options presented for **Bicester**.
 - Section 5 – deals with the options presented for **Kidlington and surrounding villages**.
 - Section 6 – deals with the options presented for **Upper Heyford**.
 - Section 7 – deals with the options presented for the **rural area**.
 - Section 8 – presents **conclusions and next steps**.

³ 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, 2018). The Town and Country Planning (Local Planning) Regulations 2012 require that an SA Report is published for consultation alongside the ‘Proposed Submission’ plan document

2 Thematic policy

2.1 Introduction

2.1.1 The aim here is to present an appraisal of the thematic policy options presented within the Options Paper.

2.2 Approach and methodology

2.2.1 At this stage it is considered appropriate to present an appraisal in the form of a **single narrative**, as opposed to presenting a series of appraisal matrices – one for each of the sets of options presented in the consultation document. The specific approach to appraisal is as follows:

A narrative discussion is presented under the ‘SA framework’, which essentially comprises a list of 20 sustainability topic headings (see further information in **Appendix I**). Under each of the SA framework headings, the aim is to present an informal discussion of options giving rise to “likely significant effects.”⁴

2.2.2 A narrative appraisal is considered appropriate given the early, high-level nature of the options presented for consultation at the current time, and on the basis that not all the options presented are in the form of mutually exclusive alternatives. The aim is to ensure that SA work is focused, concise and proportionate, focusing only on effects judged to be ‘significant’ (as opposed to every conceivable effect).⁴ This is a key element of best practice in the opinion of AECOM, mindful of recent experience⁵ and the Planning White Paper (2020).⁶ There will be the potential to undertake more formal work to explore thematic policy reasonable alternatives at subsequent stages of the plan-making process.⁷

2.2.3 The focus of the appraisal narrative is on the *options* presented within the thematic section of the Options Paper; however, some consideration is also given to other aspects of the consultation document, including the *themes* and *objectives* that are proposed to guide and focus plan-preparation, and policy proposals in terms of which the consultation document poses a *question* to consultees without setting out options.

2.3 Air and wider environmental quality

SA objective: Protect and where possible improve air quality and prevent light pollution

2.3.1 Air pollution is number three in the list of “top sustainability challenges in Oxfordshire”, as measured by annual cost to the economy, as set out within the Oxfordshire Plan consultation document (2021). Within Cherwell, there are four designated air quality management areas (AQMAs): two in Banbury; one in Bicester and one in Kidlington. In addition, there is a need to consider the Oxford city-wide AQMA.

2.3.2 The key issue is air pollution from road transport and, whilst this is set to decrease dramatically over coming years due to the anticipated national switch-over to electric vehicles (EVs), this is a priority issue nationally at the current time, is set to remain a major issue in the short term (e.g. over the next ten years) and will remain an issue following the switch-over to EVs, e.g. due to particulates generated from brakes, tires and road surfaces. The recently published UK Transport Decarbonisation Plan (2021) includes a major focus on minimising the need to travel, supporting ‘modal shift’ away from the private car and supporting the switch-over to EVs in order to meet decarbonisation targets, but there is also a strong recognition that achieving these decarbonisation goals will also lead to major benefits for air quality. For example, the Plan explains: “*We will support decarbonisation by investing more than £12 billion in local transport systems over the current Parliament, enabling local authorities to invest in local priorities – including those related to decarbonisation such as reducing congestion and improving air quality.*”

⁴ Paragraph 009 of the SA section within the Government’s Planning Practice Guidance

⁵ For example, the Plan:MK Inspector’s Report (2019) stated: “*The approach taken in Milton Keynes is a particularly focused and narrative-based approach which has appropriately concentrated on those areas where there are genuine significant effects and reasonable alternatives. The outcome is a more transparent report that avoids the issue of sustainability appraisal becoming an unmanageable audit trail of options that are either not sufficiently distinct alternatives and/or options that have no significant effect in terms of the SA (including environmental) objectives.*”

⁶ The White Paper proposed to abolish “*unnecessary assessments and requirements that cause delay and challenge in the current [Local Plan] system...*” It also lamented assessments that “*do not sufficiently aid decision-making*” and “*swathes of evidence base documents*”, and explained: “*The challenge we face – an inefficient, opaque process and poor outcomes.*”

⁷ An informal, narrative based appraisal is also considered justified recalling that SA work at this current, early stage in the plan-making process is voluntary, such that there is flexibility in respect of the approach to SA that is taken (indeed, there is much flexibility in respect of all plan-making work undertaken under [Regulation 18](#) of the Local Planning Regulations).

2.3.3 In light of these introductory remarks, the first options of note are those presented in respect of **Digital infrastructure**, as high speed broadband will support a continuation of the recent trend towards homeworking and video conferencing, serving to reduce the need to travel and, in turn, serving to reduce car trips, traffic congestion and air pollution. The proposal is to prepare a dedicated criteria-based policy in respect of digital infrastructure, to reflect the importance of the issue/opportunity. A more specific proposal is to set detailed requirements in respect of 'future proofing', which could provide useful certainty to the development industry, building on recent experience in respect of future proofing for EV charging infrastructure, and tying-in with future proofing for major changes to the way that buildings are heated.

2.3.4 Secondly, there is a need to consider policy options presented in respect of **Employment land**, recognising that HGV and light goods vehicle (LGV) movements are a major contributor to air pollution and noise/vibration issues, and can also discourage cycling and give rise to wider road safety concerns. One option presented for consultation would see employment land "mostly on previously developed land, including in less sustainable locations", and this does give rise to notable concerns, from an 'air and wider environmental quality' perspective, as such locations may not be well connected to the strategic road network, e.g. potentially ex-MOD land. There is also potentially a similar concern with focusing employment land "at the larger villages", recognising that relatively few people will live and work within the same village, and given the susceptibility of rural roads to problematic traffic congestion. Employment growth will tend to be well located, from an air quality perspective, when directed to higher order settlements, although there can still be air pollution issues arising from peak-time congestion. For example, at Banbury, where there are two AQMAs, the Community Involvement Paper (2020) explains: *"Whilst the town centre and residential areas are well served by public transport many of the employment areas to the north and east of the town have a poor service particularly outside peak time. Many also have poor quality cycle and pedestrian links."*

2.3.5 Other options of note relate to:

- Sustainable construction – the desire to achieve air tightness and, in turn, high building thermal efficiency can lead to tensions with objectives relating to indoor air quality. There is good potential to address this by carefully considered ventilation, whether that be passive or active, but ventilation measures must be appropriately operated, maintained etc by building occupants. Another concern over recent years has been in respect of the air pollution associated with combined heat and power (CHP) centres integrated within communities; for example, it has long been established that a network of three CHP engines ('energy centres') should be embedded within the NW Bicester strategic urban extension, to supply heat across the development via a network of piping to carry hot water. However, CHP is now redundant as a low carbon technology for domestic heating, following the recent decarbonisation of the national grid, which lends support for heat pump technologies (which generate heat from electricity).
- Renewable energy – wind and solar farms can give rise to visual and other amenity impacts; however, there is little reason to suggest that this will be a particular issue for the Cherwell Local Plan Review.
- Housing space standards – there could potentially be a correlation between good space standards and good standards of indoor air quality, although this is uncertain.
- Natural capital – a natural capital approach will typically involve giving consideration to the ecosystem services generated by trees, habitat patches and linear habitat features and green open space, which can include mitigating air pollution. For example, the England Tree Action Plan (2021) explains that: *"We know that the right woodlands in the right places can deliver carbon sequestration, biodiversity gains, flood prevention and better water, soil, and air quality, as well as job creation and wider social benefits for people able to enjoy them."* [emphasis added]

2.3.6 In conclusion:

- Proposed policy options in respect of digital infrastructure are strongly supported, given the potential reduce the need to travel.
- Certain options in respect of employment land are supported, whilst others give rise to a concern, particularly focusing "mostly on previously developed land, including in less sustainable locations". There is a need to secure employment growth in locations where the effect will not be to increase HGV and light goods vehicle traffic along road routes associated with problematic air quality.

2.4 Biodiversity

SA objective: Conserve and enhance the district's biodiversity and geodiversity

- 2.4.1 Key biodiversity issues and opportunities relate to spatial strategy, more so than thematic policy; however, there is nonetheless much potential to set thematic policy, to guide planning applications, that is supportive of achieving biodiversity objectives. Indeed, there is a considerable focus nationally, at the current time, on ensuring that steps are taken through the planning application process to avoid and mitigate negative effects and realise opportunities – both onsite and offsite – such that the net effect is positive for biodiversity. This approach is known as securing biodiversity ‘net gain’, with the emerging Environment Bill set to mandate that all qualifying schemes secure a 10% net gain, and the potential for Local Plans to set policy requiring a higher percentage net gain, where there is evidence to support such an approach.
- 2.4.2 Beginning with the **themes and objectives** proposed to guide preparation, it is noted that biodiversity objectives primarily sit under the “healthy place-shaping” theme. This is potentially appropriate; however, there is a need to recall that not all areas of biodiversity value require a focus on ‘shaping’ (albeit all invariably require active management, e.g. Otmoor). It is appropriate for the Local Plan Review to focus on a small number of key themes, and three is a good number; however, there is perhaps a need to confirm that a small number of key themes should feed into a list of objectives (as is currently the case), as opposed to emerging from a list of objectives. As a further point, in support of this suggestion, it is noted that the ‘natural capital’ objective listed under the ‘climate change’ theme focuses only on one ecosystem service (carbon sequestration), somewhat contrary to the natural capital approach to planning.
- 2.4.3 Moving on to the proposed policy options, the focus of the **Biodiversity** options is around setting policy to guide the local approach to securing biodiversity net gain(s). Most importantly, there is a need to consider where any offsite habitat enhancement or creation, that might be required in order to secure a net biodiversity gain, should be located. There are strong arguments for directing habitat enhancement/creation efforts to locations in proximity to the development site in question, including with a view to avoiding polarisation of landscapes (in the broadest, geographical sense) over the long term. However, on the other hand, there is a national focus on building a Nature Recovery Network, with efforts spatially targeted at priority areas. The Government is currently consulting on guidance for the preparation of Local Nature Recovery Strategies (LNRSS), which will be critical to effective spatial targeting of habitat enhancement/creation (as part of wider efforts to secure biodiversity net gain), but adoption of a LNRSS for Oxfordshire could still be some time away. Hence, as a stop-gap, there is clear merit to prioritising efforts within the established network of Conservation Target Areas.
- 2.4.4 The proposed policy options that would see a positive approach taken in respect of taking a **Natural capital** approach to planning are also supported from a biodiversity perspective. Planning for biodiversity is a cornerstone of efforts to secure natural capital and flows of ecosystem services, hence efforts to promote the value of natural capital and ecosystem services will help to ‘sell’ the value of biodiversity. Having said this, the option of requiring major development proposals to “demonstrate environmental net gain” could be a step too far, were the effect to distract from efforts to plan for biodiversity net gain (BNG), recognising that the development industry, planning authorities, stakeholders delivery partners (etc.) undoubtedly require time to build capacity and embed best practice approaches to BNG. Tools are emerging in respect of calculating environmental net gain, but these are in their relative infancy. Defra’s emerging [guidance](#) on LNRSSs (2021) is clear that “wider environmental goals” should be a focus of LNRSS preparation, but is equally clear that the priority focus should be biodiversity.
- 2.4.5 Finally, there is a need to note the **Infrastructure delivery** options, in particular the proposal to update the Infrastructure Delivery Plan (IDP) methodology to “consider social and environmental benefits of schemes and the contributions they make to [the plan’s three key themes]”. It is clearly the case that infrastructure schemes can lead to biodiversity impacts, for example linear schemes (railways, roads, pipelines) can necessitate loss of habitat, or otherwise need to pass through or across sensitive areas, for example flood plains, potentially affecting functional connectivity between habitat patches.
- 2.4.6 In conclusion:
- The proposed biodiversity options are supported, as they respond to the current national priorities (also sub-regional and Oxfordshire-wide) on taking a strategic, spatially targeted approach to planning for biodiversity net gain (as opposed to simply leaving matters to the planning application stage).

- The options that propose an emphasis on planning for natural capital and ecosystem services are also supported, although there is a need to avoid unduly distracting from efforts to plan effectively for biodiversity net gain, given that approaches and methods may take some time to bed in.

2.5 Climate change mitigation

SA objective: Minimise the district's contribution to climate change

- 2.5.1 Cherwell District Council declared a climate emergency in July 2019, following declaration of a national climate emergency in May 2019, and the passing into law of an amendment to the Climate Change Act 2008 in July 2019, which set 2050 as the national net zero target date. This target date was set broadly in line with the recommendations of the Climate Change Committee, which were made to reflect the international "Paris Agreement" (2015). Most recently, in April 2021, the UK Government committed to an interim target of 78% reduction against 1990 levels by 2035, in line with a further recommendation made by the Climate Change Committee. This interim target is now set to be enshrined in law.
- 2.5.2 The District Council has committed to 2030 as a net zero target date for its own activities as an organisation; however, more importantly, there is a commitment to *"do our part to achieve a net zero carbon district by 2030 and lead through example."* Achieving net zero by 2030 is highly ambitious, and will require that decarbonisation is a central focus of the Local Plan, albeit the Local Plan can only ever have a somewhat marginal effect on district-wide emissions because of limited ability to influence per capita emissions (in particular built environment, but also transport to an extent) of those who live within existing communities that will not be a focus of change, as directed through the Local Plan. It will be critical that steps are taken both through spatial strategy / site selection and development management policy (both area/site specific and thematic/district-wide). As part of this, there will also be a need to carefully consider the viability of decarbonisation focused policy requirements, avoiding a situation where policy is set (following whole plan viability testing), leading to a degree of comfort in respect of achieving the required decarbonisation trajectory, but not delivered in practice, due to unforeseen site specific viability challenges.
- 2.5.3 Beginning with the **themes and objectives** proposed to guide preparation, the proposal that "meeting the challenge of climate change" should be one of the three key themes to guide plan-making preparation – and support wide-ranging engagement – is supported. However, there is a need to ensure clarity of message around the particular key issues and opportunities that should be a focus of the plan, as opposed to those that are less within the remit or scope of the plan, or are of more limited significance (e.g. retrofitting historic buildings). There is a need to be clear that minimising per capita transport and built environment emissions is an overriding priority for the plan, in contrast to supporting carbon sequestration (albeit this is still important); and that the required programme of retrofitting existing properties (e.g. to improve thermal efficiency, and replace gas central boilers with heat pumps) is largely outside of the control of the Local Plan (as acknowledged within the Options Paper itself at paragraph 5.6.1). It is also suggested that there should be a clear distinction between objectives relating to climate change mitigation / decarbonisation versus climate change adaption / resilience.
- 2.5.4 Within the Climate Change section of the Options Paper, key options are presented in respect of **Sustainable construction**. The key question is whether or not to set local policy in respect of regulated operational emissions, that is the emissions associated with the operation of buildings that are dealt with by the Building Regulations. It has recently been clarified (following a lack of clarity of recent years) that it is within the remit of Local Plans to do so.⁸ However, at the same time, the Government has confirmed that it will be tightening Building Regulations over the coming years. Specifically, there is a commitment to tighten Building Regulations to the point whereby the Regulations require achievement of a defined Future Homes Standard (FHS) by 2025.⁹ As such, there is arguably relatively little to be gained by setting locally specific headline targets in respect of regulated operational emissions. Rather, there is an argument for deferring to the Building Regulations, given the Government's FHS commitments, and recognising that there is merit to a consistent national approach and, in turn, a helpful degree of clarity and welcomed certainty for the development industry. However, on the other hand, there is an argument for requiring an improvement on Building Regulations through the Local Plan Review, as a contingency for unforeseen delays to the FHS timetable. This is the "do minimum" approach recommended by the UK

⁸ This clarity was provided in the Government's response to the Future Homes Standard consultation (2021).

⁹ Also, the Government confirmed that, as an interim step towards the Future Homes Standard, Building Regulations will be tightened by 31% (in terms of maximum allowed operational emissions) in 2022.

Green Building Council (UKGBC) [Policy Playbook](#) (2021), which explains:

“The [FHS] consultation concluded that a 31% reduction in carbon emissions compared to the current [Building Regulations] is viable now on a national scale. Indeed the Government confirmed on 19 January 2021 that this 31% uplift will now come into effect in 2022. It is critical to reduce carbon emissions from new homes if the Government’s net zero emission target is to be met. Given this urgency, there is no credible reason to delay the implementation of the 31% reduction target in the wait for the [FHS].”

- 2.5.5 It is also recommended that careful consideration is given to policy options that would involve going beyond simply setting out a required overall improvement on Building Regulations. Specifically, policy could specify *how* these improvements should be achieved, in particular the extent to which a ‘fabric first’ approach should be implemented; for example, the UKGBC Policy Playbook (2021) suggests that, as a minimum, Local Plan policy should require: *“A fabric first approach shall be prioritised, ensuring that at a minimum the thermal performance of the whole envelope exceeds that of the notional specification by 5%.”* Also, the Local Plan might set requirements in respect of non-operational emissions (that is the emissions associated with a building regardless of its operational use, including emissions from construction, retrofitting and demolition) and potentially unregulated operational emissions. However, there are question-marks regarding the viability of such policy options and concerns regarding creating a complex and confusing policy environment.
- 2.5.6 Secondly, the Options Paper presents policy options in respect of **Renewable energy**. The option of allocating sites for renewable energy generation (in practice, likely to mean solar farms, but potentially also wind farms) is supported, from a climate change mitigation perspective, because this would represent a highly proactive approach, in line with the 2030 net zero target imperative. However, it is recognised that setting a clear criteria-based policy would also represent a proactive approach, helping to increase rates of delivery relative to the current situation, and would also support “community-led initiatives”, which are encouraged by the NPPF (paragraph 156). Consideration could also be given to identifying broad areas (NPPF paragraph 155 suggests that identifying ‘areas’ for renewable energy generation equates to a positive approach) as opposed to detailed site allocations; and consideration could be given to safeguarding land, as per the recently published [Cornwall Climate Emergency DPD](#).
- 2.5.7 Thirdly, there is a need to consider the decarbonisation implications of the **Town centre and retail options**, and specifically the choice between enabling a market led approach – likely to involve an increase in new homes within town centres created through permitted development rights – versus taking measures (as far as possible) to maintain core areas of town centre uses (both ‘traditional’ uses, including retail, and wider uses such as leisure, recreation and cultural uses). On one hand housing within town centres can be supportive of efforts to minimise transport emissions, support delivery of heat networks (which require high densities and a fine grained mix of uses), and can also lead to the major investment needed to deliver regeneration and wider efforts to reimagine town centres. However, on the other hand, there is a need to maintain the characteristic configuration and density of town centre uses to achieve a ‘critical mass’, and avoid this being unduly eroded by new homes in the ‘wrong’ locations. On balance, it seems clear that there will often be an important role for strategic planning to ensure clusters, or zones, of uses within town centres, in order to ensure that town centres remain attractive as destinations for residents across the District, including with a view to meeting a range of needs (retail, service, leisure etc), and therefore minimising the need to travel by private car.
- 2.5.8 A range of other policy options potentially have implications for climate change mitigation and achieving the ambitious district-wide 2030 net zero target date. Focusing on emissions from transport, there is support for **Employment land** policy options that would see new employment land directed to locations where the effect would be to minimise the need to commute by car (or, at least, commute longer distances). Also, the policy options supportive of taking a positive approach to planning for **Digital infrastructure** are supported, as homeworking negates the need to commute to employment locations by car.
- 2.5.9 In conclusion:
- The proposal to establish “meeting the challenge of climate change” as a key theme to guide the plan is supported, although there is a need to ensure clarity of message, and a clear focus on priority issues, namely per capita transport emissions and built environment emissions within new communities.
 - The proposal to consider setting local sustainable design and construction policy is supported, although there is a need to ensure clarity of message, avoiding an overly complicated local policy environment.

- The option of allocating land for renewable energy is seen as highly proactive, and in line with the 2030 net zero target imperative, but could prove challenging to implement, and there is a need to also ensure a focus on criteria-based policy (particularly with a degree of spatial targeting, e.g. broad areas of search) in support of community-led initiatives.

2.6 Climate change adaptation

SA objective: Support the district's adaptation to unavoidable climate change

- 2.6.1 Climate change adaptation is a cross-cutting topic, and whilst flood risk is potentially an overriding climate change adaptation issue, this is a focus of stand-alone discussion below (Section 2.12). Looking beyond flood risk, there is a very wide range of policy interventions needed nationally to ensure resilience to the anticipated and potential impacts of climate change, as recently explored through major reports published by the [Committee on Climate Change Adaptation Sub-Committee](#). However, it can be a challenge to identify key priorities for the key aspects of Local Plan-making, namely spatial strategy / site selection and the establishment of development management policy (both area/site specific and thematic / area-wide). The Committee on Climate Change has recently published a range of sector-specific briefing notes on climate change adaptation priorities, but there is no [briefing notes](#) dedicated to spatial plan-making.
- 2.6.2 Having made these introductory remarks, the first point to make is that the proposal to present “meeting the challenge of climate change” as one of the three **themes** to guide preparation of the plan is supported. Under this theme, key **objectives** relate to “delivering developments” that are resilient, and taking a natural capital approach to planning; this focus is broadly supported. However, it is suggested that ‘delivering developments’ must be viewed at different scales (spatial strategy, site selection, master planning, building design), and that planning for natural capital must be ‘sold’ as an approach that delivers very wide-ranging ecosystem services (there is currently a focus on carbon sequestration due to the objective being under the ‘climate action’ theme).
- 2.6.3 Within the Climate Change section of the Options Paper, the focus is on decarbonisation, which does not give rise to a concern. Elsewhere, key options are presented in respect of planning for **Natural capital** and ecosystem services. A strong emphasis on planning for natural capital is supported, including on the basis that there is a major focus on planning for natural capital within the Ox Cam Arc (see <https://www.oxcamlncp.org>). However, as per the discussion above, under ‘biodiversity’, there is a need to avoid an undue focus at the expense of other priority issues. For example, there would be a concern were it to be the case that a focus on planning for natural capital in support of improving the water flow regime in upper catchments led to undue comfort regarding flood risk or water quality within rivers.
- 2.6.4 Secondly, there is a need to consider the **Town centre and retail** options. This is because planning for the urban heat island effect, and overheating more generally, is a key issue within urban areas, with best practice approaches to master planning and urban design evolving rapidly. A key consideration is ensuring strategically located greenspace and shading, which is a reason for taking a strategic, plan-led approach to town centres, avoiding a situation whereby the market delivers high density housing in the ‘wrong’ location. The Community Involvement Paper (2020) highlighted the need to improve green infrastructure provision within urban areas, and the Oxfordshire Plan consultation document (2021) discusses “*re-imagining and re-purposing town centres*”, hence it is anticipated that planning for town centres and wider urban areas, including with a view to securing resilience to climate change, will be an important issue / opportunity to be addressed through the Local Plan Review.
- 2.6.5 Other options of note relate to:
- Infrastructure delivery - the option to explore an IDP methodology which considers the climate change implications of infrastructure strategy / scheme options is supported.
 - Biodiversity - a focus on Oxfordshire’s Conservation Target Areas (CTAs) is potentially supported, from a perspective of securing wide-ranging ecosystem service benefits, including flood risk attenuation.
 - Children’s play - the option of “*setting expectations... e.g. inclusion of pocket parks, play streets and informal play within open space areas*” is supported. The importance of good access to outside space, including through the summer months, was highlighted by the experience of national lockdowns in 2020.

2.6.6 In conclusion:

- The proposal to establish “meeting the challenge of climate change” as a key theme to guide the plan is supported, although there is a need to ensure clarity of message, and a clear focus on priority issues, potentially flood risk, overheating, water resources and taking a natural capital approach to planning.
- There is evidence that climate change adaptation is being considered from the outset, as part of wide-ranging policy formulation, and this will need to continue to be the case moving forward.

2.7 Communities

SA objective: Create and sustain vibrant communities including preventing noise pollution

- 2.7.1 Creating and sustaining vibrant communities means both shaping existing urban areas, in particular town and village centres, and directing greenfield growth to locations where the impacts to existing communities will be minimised – for example avoiding over-burdening of transport and community infrastructure - and where ‘planning gain’ can be realised, to the benefit of new and existing communities.
- 2.7.2 Mindful that certain ‘communities’ related topics are best discussed under other topic headings, below, (notably under the ‘Health’ and ‘Poverty, Disadvantage and social exclusion’ headings), a primary set of options to discuss is that presented in respect of **Town centre and retail**. As discussed above, under ‘Climate change adaptation’, there is a need to reimagine town centres. Strategic planning has an important role to play, although there will also be a need to work very closely with the development industry, including with a view to securing funding for infrastructure including community and green infrastructure. The national context, in respect of planning for town centres is evolving rapidly, including on the basis of much recent and ongoing research including on [retail trends](#) and the increasing [value](#) attributed to greenspace and environmental quality, hence the Local Plan Review will need to respond accordingly.
- 2.7.3 Secondly, it is considered appropriate to discuss **Children’s Play**, which is a notable focus in the Options Paper, and appropriately so given the key role to be played by Local Plans. There has been much evolving good practice, in respect of planning for children’s play, over recent years and decades; however, there is much further potential to improve practice, informed by recent and ongoing research. The proactive approach proposed by the Options Paper is supported, on the basis that *“the traditional approach to play areas does not offer enough opportunities for creative play particularly for younger children, and those for older children can exclude some groups. The approach being advocated is one that seeks to create ‘play friendly’ environments incorporating opportunities throughout developments, rather than in a single location.”*
- 2.7.4 Following on from this, the Options Paper proposes a change in tack around providing for **Outdoor sports** facilities, on the basis that *“the current policy approach of securing new pitch provision as part of strategic development sites”* has led to fragmented provision that has been underused. The proposed new approach of securing and establishing “sports hubs” at main settlements is supported, including as this is the approach advocated by National Sporting bodies and other stakeholders. It is considered that more centralised sports hubs can act as a focus for the whole community and facilitate club development more effectively. The option to *“use financial contributions from developers in lieu of on-site provision on strategic sites to enhance existing facilities, to enable increased use”* is also supported.
- 2.7.5 There is also a need to discuss the options for **Employment land**, recognising that creating and sustaining vibrant communities includes providing accessible employment opportunities. The option of focusing a level of growth *“at the main urban centres”* performs well, from a ‘communities’ perspective, given the potential to support active travel and foster a sense of local community. In this light, focusing employment growth at *“transport nodes and less sustainable areas”*, is seen as potentially problematic, as while it would utilise the districts’ transport links, it would likely increase congestion issues, increasing out-commuting from the main centres. This option would, however, contribute towards improving access to services, facilities, homes and jobs in the less urban/ rural areas. Likewise, positive and negative effects are likely to be seen through the option of focusing growth at the *“large villages”*, given their less sustainable location when compared with Bicester, Banbury and Kidlington.

2.7.6 Other options of note relate to:

- Renewable energy – renewable energy schemes can lead to social-economic benefits, helping rural communities thrive, providing jobs and overall prosperity. However, renewable energy schemes can also adversely impact residential amenity and the distinct characteristics that define communities. Therefore, support is also given to the option to: *“Use a criteria-based policy to assess the appropriateness of proposals for renewable energy generation”*. There is a need to “support community-led initiatives for renewable and low carbon energy”, in-line with NPPF paragraph 156; however, there is also a need to consider the option of taking a more proactive approach through the Local Plan Review, recognising the imperative of decarbonisation, which could mean allocating sites or broad areas.
- Digital infrastructure - the Oxfordshire Digital Infrastructure Strategy (2020) sets out that society is increasingly dependent on high-quality digital infrastructure provision. All options presented will therefore positively impact Cherwell’s communities by ensuring all new development is fully supported by high-quality digital provision. As set out in the Oxfordshire Plan consultation document (2021), benefits to the community include facilitating efficient home working, reducing the need to travel, smart mobility (e.g. on demand services) and delivering ‘smart homes’, including in support of electricity tariffs geared to electric heating and EV charging.
- Sustainable construction - the option to *“set sustainable design and construction standards for residential and non-residential development in Cherwell above those required by Central Government”* is supported. The implementation of higher energy efficiency standards could bring a range of benefits for the quality of life of residents, delivering sustainable communities through enhancing the energy efficiency of housing, lowering energy costs, reducing fuel poverty, and supporting health and wellbeing through the delivery of high-quality homes. However, whilst increased energy efficiency in new housing will bring a range of benefits for the quality of life of residents, as set out through the Options Paper, there is potential for a stricter policy to affect the deliverability and viability of new developments. There is also a need to carefully design-in effective ventilation as part of highly thermally efficient homes.
- Infrastructure delivery - the option of *“updating the methodology to consider social and environmental benefits of schemes and the contributions they make to Climate Action, Healthy Place Shaping, and a Sustainable Economy”* is supported, supplementing the main objectives of the Oxfordshire Plan (see consultation document 2021). As set out in the consultation document *“good growth in Oxfordshire will: Be healthy and inclusive, with all development addressing inequalities and contributing positively to the overall health and wellbeing of Oxfordshire’s communities, environment and economy.”* The increased emphasis on supporting ‘strong, vibrant and healthy communities’ is further reflected through the recent NPPF updates (2021) and the National Design Code (2020).

2.7.7 In conclusion:

- The Options Paper proposes a notably proactive approach in respect of planning for children’s play space and outdoor sports provision, responding to latest evidence and understanding.
- Similarly, the Options Paper recognises the crucial importance of “reimagining” town centres, although there is clearly more work to be undertaken ahead of determining what this means in practice.
- A wide range of other proposed policy options perform well, from a ‘communities’ perspective. Few potential tensions are highlighted, although it is recognised that ‘larger than local’ economic growth objectives could potentially lead to a tension with local objectives around securing good employment.

2.8 Crime

SA objective: Reduce crime and disorder and the fear of crime

- 2.8.1 The latest statistics (July 2018 – June 2019) show that the crime rate in Cherwell is 67 per 1,000 of the population, which is just below the wider Thames Valley area of 68 per 1,000 of the population. However, between 2011 and 2019, there was an increase in both crime rates and in the severity of crime score.¹⁰

¹⁰ ONS (2019) Crime severity score – experimental statistics; see <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/articles/researchoutputsdevelopingacrimeseverityscoreforenglandandwalesusingdataoncrimesrecordedbythepolice/2016-11-29>

- 2.8.2 Issues explored through the Options Paper are unlikely to have any direct implications on crime; however, the **Town centres & retail** options are of note. In particular, the option to “*maximise flexibility in the town centre for different uses, such as community and leisure*” (including green, open spaces) is supported, recognising the potential to positively impact upon perceptions of personal safety, particularly at night.
- 2.8.3 For the same reason, the **Children’s play** option to “*seek opportunities to integrate play facilities throughout towns and developments identifying minimum standards and setting expectations through design and other place making policies e.g. inclusion of pocket parks, play streets and informal play within open space areas*” is supported, provided that facilities are well-located, e.g. avoiding the risk of antisocial behaviour. Similarly, the options in respect of **Outdoor sports provision** are of relevance, particularly the option of establishing sports hubs at the main settlements. Sports hubs would, by their nature, be used throughout the much of the day and week, thereby discouraging crime and antisocial behaviour, and could also be supportive of organised community activities aside from sports.
- 2.8.4 There is also a need to briefly touch upon the **Infrastructure delivery** options, recognising that the Healthy Place-Shaping Principles form one of the core themes and are also included in the Oxfordshire Plan Consultation document (2021) with a wider ambition to “*create safe environments, addressing the fear and perception of crime, including improving safety for all road users.*” Therefore, the option of “*updating the methodology to consider social and environmental benefits of schemes and the contributions they make to Climate Action, Healthy Place Shaping, and a Sustainable Economy*” is supported given that the implementation of health place shaping principles, alongside infrastructure delivery, may support reduced crime and the fear of crime in the long term.
- 2.8.5 In conclusion:
- Options which promote the adoption of ‘place shaping principles’, particularly in relation to infrastructure delivery, town centres, children’s play and sports provision are supported.

2.9 Digital infrastructure

SA objective: Ensure that digital infrastructure meets the needs of current and future generations

- 2.9.1 The Oxfordshire Digital Infrastructure Strategy and Delivery Plan (2020) highlights that there are few areas in the UK where the importance of world-class digital infrastructure is as pronounced as in Oxfordshire. Whilst this critical infrastructure will secure business competitiveness and economic growth, it is noted that society is increasingly dependent on high-quality digital infrastructure provision for our everyday needs.¹¹ This dependency was exacerbated during the recent COVID-19 pandemic where digital provision was key in enabling many people to continue to work and access services and facilities remotely.
- 2.9.2 The Oxfordshire Digital Infrastructure Strategy and the national Future Telecoms Infrastructure Review (2018) outline that in order to provide for this more digital world there is a need to deliver near 85% nationwide coverage of full fibre by 2025, and deployment of 5G to the majority of the country by 2027.¹² The rollout of enhanced digital infrastructure is identified as vital for both rural and urban Oxfordshire.
- 2.9.3 All of the options presented in relation to **Digital infrastructure** are supported given all seek to protect and improve digital connectivity. The option to “*provide a policy with the requirements expected from new development to provide digital connections and be designed to accommodate future digital infrastructure needs (future proofing)*” reinforces the importance of long-term spatial planning as set out through the Oxfordshire Plan consultation document (2021), recognising that the way people live their lives is increasingly influenced by changes brought about by technology and innovation. For example, the availability of high-quality fixed and mobile digital connectivity can significantly impact on the need to travel, with trends such as flexible and home working dependant on its continued provision. Para 114 of the NPPF (2021) makes clear that planning policies should ‘*support the expansion of electronic communication networks, including next generation mobile technology (such as 5G) and full fibre...*’

¹¹ <https://digitalinfrastructureoxfordshire.co.uk/whats-next/timeline-strategy/digital-infrastructure-strategy>

¹² <https://www.gov.uk/government/publications/future-telecoms-infrastructure-review>

- 2.9.4 Other options to note are in respect of **Employment land**. Considering the changing requirements of different employment sectors, and changing local service needs, the flexible approach of “*providing a mixture*” of options (i.e. of mixed use and specific use sites) is supported, allowing digital infrastructure and any associated employment sectors to thrive. Notably, the Oxfordshire Local Enterprise Partnership (LEP) has identified automotive and motor sport, creative and digital, electronics and sensors, life sciences, and space technologies as being five key industries for the future.
- 2.9.5 In conclusion:
- Proposed policy options in respect of digital infrastructure are strongly supported

2.10 Education and skills

SA objective: Maintain and improve levels of education and skills in the population overall

- 2.10.1 Local Plan-making has a critical role to play in respect of delivering new schools in the right locations (also supporting the expansion of schools); and ensuring a highly skilled workforce is also a key objective for the Local Plan Review, recognising the national importance of realising opportunities to enhance the Oxfordshire’s economic productivity, particularly within the knowledge economy.
- 2.10.2 In this light, the proposed **themes** and **objectives** for the Local Plan Review are supported. However, under the ‘sustainable local economy’ theme it is suggested that consideration should be given to means of supporting skills through the Local Plan Review beyond encouraging local companies to invest in the local workforce; and under the ‘health place-shaping’ theme it is suggested that there might be a more explicit focus on planning for school capacity and further education, given the potentially key role for the Local Plan.
- 2.10.3 With regards to policy options, none deal directly with education and skills; however, a number are of indirect relevance. Notably, the proposed approach of proactively planning for **Digital infrastructure** is strongly supported, recognising the importance of education and skills training from home.
- 2.10.4 In conclusion:
- The proposed Local Plan Review themes should enable a positive approach to planning for education and skills through the Local Plan, although there is a need for further work to identify specific priorities.

2.11 Employment and economic growth

SA objectives: Ensure high and stable levels of employment across the district; and Sustain and develop economic growth and innovation and support the long-term competitiveness of the district

N.B. for the purposes of this early appraisal commentary, the decision has been taken to present a single discussion covering both ‘employment’ and ‘economic growth’. Moving forward, efforts will be made to draw a distinction between, on the one hand, meeting local employment needs and, on the other hand, ensuring that the District’s economy contributes most fully to sub-regional and national growth objectives.

- 2.11.1 The Options Paper presents a detailed review of the wide-ranging policy context that serves to identify clear economic growth objectives for Cherwell and also recognises certain tensions that can exist, for example around delivering new warehousing space, which is in high demand nationally, but which is associated with low employment densities. There are likely to be difficult choices to be made in respect of employment land strategy in respect of quantum, location and type, plus there will be a need to carefully consider the employment role of town centres and employment in rural areas.
- 2.11.2 The need to make difficult choices is reflected in the **Employment land** options presented. However, in practice, there is likely to be a need to support a strategy that is an amalgam of the options presented. This could mean supporting new employment land at a range of locations, to include the main urban centres, transport interchanges and larger villages. With regards to the option of supporting new employment land on previously developed land in less ‘sustainable’ locations, this option is not supported from a sustainability perspective on balance, although it is recognised that employment land in such locations might face relatively few barriers to delivery, which is an argument in favour. In practice, a key consideration is likely to be delivering new employment land in such a way that the effect is to support agglomerations in the form of clusters and corridors, and if ‘less sustainable locations’ fall in such areas, then they could prove suitable.

- 2.11.3 The options presented under the **Town centres and retail** heading are also of note, given Oxfordshire's Economic Recovery Plan (2021), which highlights that the role of city and town centres has changed as a result of COVID-19, and that there is a "*requirement for places to fundamentally reimagine what these locations will look like, and how the buildings and facilities will be utilised effectively to draw people back.*"¹³ There will be a need to explore the employment role of town centres, including in terms of office space, reflecting the increase in home working; however, the extent to which this will be a primary consideration for Cherwell's town centres remains to be seen.
- 2.11.4 Another important consideration is the rural economy, with the Options Paper setting out an objective to "support a sustainable rural economy including sustainable agriculture and farm diversification; and support our farmers in food production whilst ensuring the effective management of the natural environment." There will be a need to consider whether existing thematic, district-wide development management policy relating to farm diversification and farm buildings requires adjustment, or can broadly rolled forward, and another important point for consideration will relate to delivering new employment land at villages, including potentially flexible working spaces, which could necessitate some enabling housing.
- 2.11.5 A final point to note is the potential for the Local Plan Review to support growth industries, including 'green jobs', including relating to **natural capital** and **sustainable construction**. In this respect, several the policy options presented within the Options Paper are supported.
- 2.11.6 In conclusion:
- The Options Paper is clear regarding the difficult choices that will need to be made around employment land strategy, which is strongly supported. There will undoubtedly be a need to balance and reconcile sub-regional and national economic growth objectives with a range of local objectives.

2.12 Flood risk

SA objective: Reduce the risk from all sources of flooding

- 2.12.1 The predominant risk of flooding within Cherwell is due to flooding from rivers and watercourses, and Banbury stands-out as a town with some flood risk constraints associated with the River Cherwell, although Bicester (tributary of the River Ray) and Kidlington (River Cherwell) are also subject to constraint. Numerous villages and hamlets are also associated with a degree of flood risk, including in the east of the District, noting that the gradient of the River Ray is among the lowest in the UK, which makes the catchment particularly vulnerable to flooding.
- 2.12.2 Surface water flood risk is also an important consideration, with the Cherwell Level 1 SFRA Update (2017) identifying several areas at particular risk, including Banbury, Kidlington, Launton, Ropredy, Tadmarton, and Bloxham. It is noted that the Oxfordshire Authorities are commissioning a Strategic Flood Risk Assessment (SFRA) to inform the production of the Oxfordshire Plan, which will provide up-to date information on flood risk, from all sources, and will be based upon the latest evidence and modelling, including the latest climate change projections.
- 2.12.3 As reflected through the Oxfordshire Plan consultation document (July 2021), when considering flood risk management and adaptation in Cherwell (and subsequently at the Oxfordshire scale), the priority should be to work with natural processes wherever possible, utilising natural flood management methods. This approach can help to deliver wider benefits for people and wildlife by helping to restore habitats, improve water quality and increasing resilience to climate change.
- 2.12.4 The importance of 'acting now' to minimise and adapt to flood risk is reflected in the National Flood and Coastal Erosion Risk Management Strategy for England (2020), which recognises the importance of strategic planning, with a priority to "*help local places better plan and adapt to future flooding*".

¹³ https://www.oxfordshirelep.com/sites/default/files/uploads/Oxfordshire%20ERP%20Action%20Plan%20-%20FINAL%20%2826th%20February%202021%29_0.pdf

2.12.5 While the Options Paper does not present any specific flood risk focused options at this stage, there is a need to consider policy options presented in terms of **Natural capital**, recognising that extending and strengthening Cherwell's green and blue infrastructure can deliver a wide range of ecosystem services, including flood storage and attenuation. Support is therefore given to the option to: *"Include a policy in the Plan requiring major development proposals to a) be supported by a natural capital assessment to demonstrate the impact of the proposal and b) demonstrate environmental net gain"*. However, 'traditional' approaches to planning for flood risk management will also need to remain a key focus of plan-making.

2.12.6 Other options of note relate to:

- Sustainable construction – recognising the opportunities presented through new development to design-in Sustainable Drainage Systems (SuDS) and resilience to flooding; however, it is recognised that the current focus is on achieving 'net zero' new homes.
- Location of employment land – there is a need to carefully consider whether employment land is an appropriate use within floodplains, including mindful of increasing down-stream flood risk. It is noted that a considerable amount of employment land at Banbury, for example, is in within flood zone 2.

2.12.7 In conclusion:

- The proposed focus on a natural capital approach is strongly supported.
- National policy in respect of directing sensitive uses away from flood risk zones and considering the downstream implications of development in flood plains, is currently being updated, hence there will be a need to respond to the latest policy and guidance through the next stages of the Local Plan Review.

2.13 Health

SA objective: Improve the health and wellbeing of the population and reduce inequalities in health

2.13.1 The 2011 Census statistics suggest that perceived health in Cherwell is generally good with 85% of the population in very good or good health.¹⁴ Nonetheless, Cherwell has an ageing population, and residents suffer from a range of health conditions. Isolation and loneliness have been found to be a significant health risk, with data showing Banbury and Bicester Town as being in the highest risk quartile of all neighbourhoods in England (2016).¹⁵

2.13.2 There is significant and growing evidence on the physical and mental health benefits of green spaces; however, in recent years, accessible green spaces and habitats have decreased due to increases in the extent of urban areas and housing density. The experience of the COVID-19 pandemic has promoted a greater appreciation of accessible green/open spaces, in addition to the importance of active travel to support healthy lifestyles. Increasing active travel uptake in the District is a key objective for the emerging Local Plan, noting that in November 2017/18, 33.3% of Cherwell adults participated in active travel (at least twice in the last 28 days) which is below the national average (38.8%).¹⁶

2.13.3 Health is a highly cross-cutting issue, such that options across a wide range of policy areas could lead to implications; however, one immediate stand-out consideration is the importance of high-quality **housing** for the achievement of health objectives. A number of the options presented are positive, from a health perspective, including the option of increasing the percentage requirement of affordable housing required on qualifying sites, and the option of introducing *"a policy which requires all new dwellings to meet the nationally described space standard..."* The option of introducing accessibility standards for a proportion of new homes is also of note, as the effect would be to assist older and disabled people to remain living independently in their own homes, supportive of health and wellbeing objectives.

¹⁴<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/2011censuskeystatisticsforenglandandwales/2012-12-11#health>

¹⁵<http://data.ageuk.org.uk/loneliness-maps/england-2016/>

¹⁶<https://www.gov.uk/government/collections/walking-and-cycling-statistics>

- 2.13.4 The cross-cutting nature of health-focused policy is also reflected in the policy options presented under the **Infrastructure delivery** heading. One proposal is to update the Infrastructure Delivery Plan (IDP) methodology *“to consider social and environmental benefits of schemes and the contributions they make to Climate Action, Healthy Place Shaping, and a Sustainable Economy”*, which is supported, from a health and wellbeing perspective. This approach would align with emerging Oxfordshire Plan proposals, with the recent consultation document explaining that *“good growth in Oxfordshire will: Be healthy and inclusive, with all development addressing inequalities and contributing positively to the overall health and wellbeing of Oxfordshire’s communities, environment and economy.”* The increased emphasis on delivering ‘healthy places’ is further reflected in the recent NPPF updates (2021) and the National Design Code (2020).
- 2.13.5 A next port of call is the series of **Town centre and retail** options. The points discussed above under the Communities heading, in respect of reimagining town centres in order to secure their long-term role, are also of clear relevance to any discussion of health objectives. Another important consideration is ensuring active travel links between residential areas and town centre and ensuring that town centres are at the heart of town-wide green/blue infrastructure networks.
- 2.13.6 Other notable considerations relate to the **Biodiversity** focused options, all of which are supported to some extent, given all will support delivery of biodiversity net-gain. In particular, the options highlight a need to strike a balance between, on the one hand, wishing to secure and enhance biodiversity in close proximity to development sites so that new communities can easily benefit, with, on the other, delivering strategic enhancements, for example making accessible whole stretches of river valley. Within Cherwell, there is clear potential to take a strategic approach to enhancing and making accessible the Cherwell river valley, leading to wide-ranging ecosystem service benefits, including health and wellbeing related objectives.
- 2.13.7 Other options of note relate to:
- Natural capital - the option to *“require major development proposals to be supported by a natural capital assessment and requiring environmental net gain to be demonstrated”* is supported, given environmental net gain can also deliver social and health benefits.
 - Sustainable construction - the Oxfordshire Plan consultation document is noted for its proposal to set a framework for housing quality and undertaking health impact assessments to improve the quality of life for residents. The option to *“set sustainable design and construction standards for residential and non-residential development in Cherwell above those required by Central Government”* is therefore supported, recognising the increased potential to deliver positive effects for health and wellbeing. This is linked to the delivery of high-quality, energy efficient housing, which will support good physical and mental health through creating healthy indoor living environments with healthy air temperatures, humidity levels, noise levels, and improved air quality. This has potential to benefit the health and wellbeing of groups with poor health, including older people or disabled people. However, whilst increased energy efficiency in new housing will bring a range of benefits for the quality of life of residents, as set out through the Options Paper, there is potential for a stricter policy to affect the deliverability and viability of new developments, and ensuring good ventilation within buildings is a consideration.
 - Children’s play - safe and stimulating play facilities are essential for a child’s wellbeing, health and future development. The Oxfordshire Children and Young People’s Plan 2018-2023 sets the strategic direction and priorities for services for children, young people and families in Oxfordshire, which includes ‘access easy ways to get active’ and ‘have a place to feel safe’. As set out in the options paper, there is emerging research that suggests the traditional approach to play areas do not offer enough opportunities for creative play, particularly for younger children or, can be exclusionary for some groups of older children. The option to *“to integrate play facilities throughout towns and developments identifying minimum standards and setting expectations through design and other place making policies e.g. inclusion of pocket parks, play streets and informal play within open space areas”* is therefore supported, utilising opportunities throughout developments to provide inclusive and accessible spaces. The option will support the health and wellbeing of children (and in turn parents), offering high-quality play and informal recreation opportunities in child-friendly neighbourhood environments, rather than in isolated locations.

- Outdoor sports facilities - The Public Health England report 'Improving access to greenspace' highlights how the COVID-19 pandemic has made many of us all the more aware of how much we value and rely on our outdoor spaces to support our health and wellbeing.¹⁷ In light of the increased understanding and appreciation of the mental and physical benefits of outdoor activity, and given the deficiencies in parts of the district, the options to “*secure and establish sports hubs at main settlements*” and “*use financial contributions from developers in lieu of on-site provision on strategic sites to enhance existing facilities, to enable increased use*” are supported. This is given these options would likely improve accessibility to sports facilities and open space for all, supporting the delivery of connected, healthy places. Concern is raised for the option to “*continue the current policy approach of securing new pitch provision as part of strategic development sites*”, as this has been seen to result in fragmented sports provision with poor quality underused pitches, and associated management and maintenance issues.
- Digital infrastructure - all options presented will positively impact the health of the district by ensuring all new residents have full access to high-quality digital provision which has become increasingly important for accessing services and keeping communities connected.

2.13.8 In conclusion:

- A wide range of the proposed policy options lead to positive implications for the achievement of health and wellbeing objectives.
- In particular housing focused options that would ensure access to high-quality housing for all are supported, as is the proposal to adjust the IDP methodology to ensure that decisions on infrastructure are made with a clear understanding of implications for healthy place shaping.
- Options supportive of reimagining town centres are also supported, from a health perspective, given retail trends and increased value attributed to leisure and recreation space following the C-19 pandemic.
- Certain sport and recreation options are supported, while others give rise to a concern, in particular “*continuing the current policy approach of securing new pitch provision as part of strategic development*”.
- The options requiring ambitious targets for sustainable construction and requiring major development to include environmental net-gain are also supported.

2.14 Historic environment

SA objective: Protect, enhance and make accessible for enjoyment, the district's historic environment

- 2.14.1 There are many heritage assets within the District including 60 Conservation Areas, over 2,300 Listed Buildings, 38 Scheduled Monuments, eleven Historic Parks and Gardens and one Historic Battlefield. There are also locally designated and undesignated assets, including ancient routeways and other sites of archaeological interest. In terms of historic character and setting southern areas of the District (13.8%) sit within the setting of historic Oxford and are protected by the Oxford Green Belt. Consideration is also given to Blenheim Palace World Heritage Site, which lies directly to the west of the District boundary.
- 2.14.2 Beginning with the **themes** and **objectives**, the historic environment and heritage is a focus under the 'healthy place-shaping' theme, which is appropriate. This includes both protecting assets and enhancing and increasing access in-line with NPPF paragraph 190, which encourages a 'positive' strategy. Various matters are currently discussed alongside biodiversity and it is suggested that discussion alongside landscape could be more appropriate. Consideration could also be given to the possibility of encouraging a natural capital approach to managing landscapes (for example, and notably, river valleys) that takes account of the historic environment and heritage, alongside wide-ranging other factors (e.g. biodiversity, landscape, traditional economic uses) to ensure a holistic approach to 'place'.

¹⁷https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/904439/Improving_access_to_greenspace_2020_review.pdf

- 2.14.3 While the Options Paper does not set out explicit options in relation to the Historic Environment, options of note are those presented in relation to **Town centres and retail**, addressing the changing role of centres, and need for town centres to offer a range of uses. From a historic environment perspective, there is an argument for tempering change within town centres, for example seeking to resist residential development where the effect could be to erode historic character strongly associated with retail and other traditional town centre uses. This approach could be in-line with the National Design Guide (2021), which recognises the need to “*respond positively to the pattern of uses and activities, including community facilities and local services*” (National Design Guide, 2021). It is also noted that Historic England encourages “*reviewing and managing shop fronts as a collection rather than individually*”,¹⁸ retaining the historic character of local centres, and allowing for the understanding of heritage assets in context. However, it is recognised that there is much potential to support significant change within town centres that is sensitive to heritage and the historic environment, for example through the use of appropriate materials and design; guidance in this respect is provided by Historic England.¹⁹
- 2.14.4 Secondly, there is a need to consider options in relation to **Sustainable construction**, recognising that setting standards for sustainable design and construction presents opportunities and challenges in terms of the built historic environment. Retrofitting thermal efficiency and low carbon heating into historic buildings can pose challenges given a need to protect external appearance and the importance of maintaining existing building fabrics and internal features. However, there is advice available from Historic England focusing on the challenges and opportunities for achieving energy efficiency in historic buildings and areas.²⁰ It is therefore considered that while challenging, setting ambitious standards for proposals can help to i) increase resilience of historic buildings to climate change, ii) secure a sustainable future for designated and non-designated heritage assets, and iii) conserve and where appropriate enhance the design, character, appearance and historical significance of features and areas of historic environment interest. The option to “*Set sustainable design and construction standards for residential and non-residential development in Cherwell above those required by Central Government*” is therefore supported.
- 2.14.5 Thirdly, there is a need to consider the **Employment land** options. The option of delivering employment growth primarily at the District’s larger villages gives rise to a degree of concern, given the potential to impact upon the setting and special character of designated cultural heritage assets. Similarly, a focus on the main urban centres of Banbury, Bicester and Kidlington may lead to adverse effects given the rich heritage present, e.g. recognising assets such as Bicester Airfield and the Oxford Canal. Support is given to the option which focuses growth “*on previously developed land*” recognising that the regeneration of previously developed land provides opportunities to enhance the village/ townscape through the removal of derelict or underused buildings with high-quality development and wider public realm improvements.
- 2.14.6 The Options Paper also presents an important discussion of Ancient Routeways, which is a matter that could potentially be a focus of forthcoming work to plan at landscape scales for biodiversity (through Local Nature Recovery Strategies) and wider natural capital and ecosystem services. Ancient Routeways will tend to follow valleys which, in turn, will also be a focus of historic and more modern settlement and transport connections, which serves to further highlight the potential to take an integrated approach.
- 2.14.7 Other options of note relate to:
- Renewable energy - depending on the scale, design and prominence, renewable energy proposals within the setting of a heritage asset may cause harm to the significance of the asset, and there can also be impacts on historic landscapes. As such, while higher level policy provides a level of protection to heritage, the option to “*use a criteria-based policy to assess the appropriateness of proposals for renewable energy generation*” is supported.
 - Natural capital - the option to require major development proposals to demonstrate environmental net gain is supported, recognising the potential to consider heritage and the historic environment alongside strict ‘environmental’ considerations, recognising the links and interdependencies. Setting a requirement for net gain has the potential to enhance and improve the quality of the public realm, which may support the setting of the historic environment and contribute to historic landscape character.

¹⁸ <https://historicengland.org.uk/advice/planning/historic-towns-and-high-streets/>

¹⁹ <https://historicengland.org.uk/advice/hpg/consent/permissonandhas/>

²⁰ <https://historicengland.org.uk/advice/technical-advice/energy-efficiency-and-historic-buildings/>

- Infrastructure delivery - the option to “*explore a methodology which considers the wider context of social and environmental benefits of infrastructure and the contribution of infrastructure schemes to [...] Healthy Place shaping*” is supported, recognising that healthy place shaping includes “*fostering well-designed beautiful and safe places that support communities’ health, social and cultural well-being*” (NPPF, 2021). The historic environment is often an important consideration when planning for infrastructure, including major linear infrastructure, which will often follow river valleys which, in turn, tend to be associated with historic settlement, as well as wide-ranging other valued natural capital etc.
- Children’s play - the option to “*seek opportunities to integrate play facilities throughout towns and developments identifying minimum standards and setting expectations through design and other place making policies e.g. inclusion of pocket parks, play streets and informal play with open space areas*” is of note, recognising that parks and green space can contribute to historic character within settlements.

2.14.8 In conclusion:

- Options in respect of town centres, employment land and sustainable construction have implications for the historic environment, which will need detailed consideration moving forward.
- There is clearly much potential to take an integrated approach to planning for the historic environment alongside natural capital at landscape scales, including at the scale of the sensitive river valleys, which are associated with historic settlement and important transport corridors.

2.15 Homes

SA objective: Ensure the opportunity to live in a decent, sustainably constructed and affordable home

- 2.15.1 The Options Paper is clear that a key consideration for the Local Plan will be in respect of determining a housing requirement (i.e. determining the number of homes that must be delivered, with this figure then a focus of monitoring and reporting on five year housing land supply, as well as reporting performance against the Housing Delivery Test) and how housing should be distributed, including with a view to meeting locally arising housing needs and ensuring a suitably diverse ‘portfolio’ of committed housing sites that minimises the risk of housing supply trajectory falling below the annualised requirement). However, at this current stage, the focus is on setting development management policy, rather than broad strategy or site selection for housing (given the timing and relationship with the Options presented in the Oxfordshire Plan 2050 consultation). In particular, the focus is on policy around affordable housing and housing quality. These are important considerations; however, there is a need to recall that setting stringent requirements will have cost implications, which will impact on development viability in combination with other policy requirements, for example around decarbonisation and biodiversity net gain.
- 2.15.2 Beginning with **Affordable housing**, there will be a need to respond to the objective evidence, which will likely evolve over the course of the plan-making process; however, broadly speaking, from a ‘housing’ perspective, there is support for increasing the percentage of affordable homes that must be delivered on qualifying sites. The current evidence is indicating that this could be necessary, with the Options Paper explaining: “*At April 2021, there were over 1,500 active applications on the Cherwell housing register, an increase from the 1,300 housing register applicants in April 2020.*”
- 2.15.3 Requirements around the tenure of affordable housing are also an important consideration for Local Plans. Again there are cost/viability implications, plus there is a need to take careful account of the latest Government policy and guidance;²¹ however, broadly speaking, from a ‘housing’ perspective, and noting the currently available evidence, there is support for the higher cost option of prioritising “*the provision of social rented housing above other affordable housing tenures*”. The Options Paper explains that “*despite significant residential development over recent years, there remains a lack of new supply of social rented housing in the district. Social rented homes currently account for only 13% of all dwellings in Cherwell, which is below the national average of 19%. Housing remains unaffordable for many.*”

²¹ For example, earlier this year the Government introduced a new type of affordable tenure called First Homes. Specifically, the Government stipulated that a minimum of 25% of affordable homes secured through developer contributions should be First Homes, which are homes ringfenced for first-time buyers.

- 2.15.4 Moving on to **Housing quality**, this is a key issue locally, particularly at those settlements that have seen significant housing growth over recent years, notably Bicester and Banbury. Again, whilst it is the case that a final policy approach will need to be determined following consideration of ‘whole plan viability’, at this current stage, and speaking broadly from a ‘housing’ perspective, there is support for setting stringent policy requirements, notably by requiring space standards and accessibility standards that are either not included within, or go beyond the minimum requirements set out in Building Regulations.
- 2.15.5 A range of other options also have implications for ‘housing’, in so far as they could potentially lead to cost and, in turn, viability implications, which could theoretically conflict with housing objectives in particular securing affordable housing. For example, requiring standards of **Sustainable construction** over-and-above the minimum requirements set out in Building Regulations (which are set to be tightened significantly over coming years, to the point where the ‘Future Homes Standard’ is required) can lead to significant cost implications. However, having said this, there is increasing precedent nationally of requiring high environmental standards whilst also not comprising affordable housing objectives.
- 2.15.6 In conclusion:
- Options that would see increased affordable housing and housing quality requirements are broadly supported, on the basis of the available evidence; however, moving forward, there will be a need to take careful account of the latest technical evidence (also Government policy) and carefully consider implications for whole plan viability, noting the need to also support high environmental standards.

2.16 Land and soils

SA objective: Conserve and enhance soil and the efficient use of land

- 2.16.1 Key considerations relate to protecting best and most versatile agricultural land, avoiding the sterilisation of known minerals resources and, more generally, making best use of previously developed land. Taking matters in turn:
- The majority of land within Cherwell is shown by the nationally available agricultural land quality dataset (which is low resolution, and does not differentiate between grade 3a and 3b quality land) to be of grade 3 quality (good to moderate), with land in the north of the District grade 2 (very good). Some areas have also been surveyed in detail, notably the majority of land surrounding Banbury, with surveys finding most of the land to be of grade 2 quality, along with some grade 1, grade 3a and 3b.
 - Minerals Safeguarding Areas within Cherwell include crushed rock North West of Bicester, soft sand in the Duns Tew area and sharp sand and gravel in the Yarnton area.
 - The percentage of new dwellings on previously developed land in Cherwell has increased since 2016/17, reflecting the Council’s preference to favour the development of previously developed land and the conversion of existing buildings, to limit the impact of new development on the countryside.
- 2.16.2 Considering these introductory remarks, the first options of note are those presented in respect of the **Location of employment land**. The option to focus employment land *“mostly on previously developed land, including in less sustainable locations”* is most heavily supported given it would minimise the loss of greenfield and best and most versatile land. Focusing growth at the main urban centres is also likely to lead to a reduced level of greenfield development when compared with other options and is therefore also supported. The options to deliver employment growth at *“transport interchanges”* and the *“larger villages”* are more problematic given the likely loss of agricultural land.
- 2.16.3 Secondly, there is a need to touch upon the **Town centres and retail** options, with support given to the option to *“Maximise flexibility within the town centre for different uses”*. It is considered that applying a more flexible approach to change of use has the potential to create opportunities to increase density and the reuse of land and buildings in urban areas. This will support the efficient use of land.
- 2.16.4 Other options of note relate to:
- Sustainable construction - the option to *“set sustainable design and construction standards above those required by Central Government”* is supported, given it has increased potential to support a reduction in resource use, in line with increased national focus minimising embedded and other ‘non-operational’ carbon emissions associated with the built environment.

- Renewable energy - the Options Paper recognises that the Local Plan Review will need to consider the land use implications of renewable energy generation objectives, being Oxfordshire's second largest renewable energy producer. This is reiterated through the Oxfordshire Plan consultation document, which recognises that *"the delivery of strategic scale renewable energy generation will have land use implications"*. Therefore, the option of *"using a criteria base policy to assess the appropriateness for renewable energy generation"* is supported, given the potential to increase the consideration of land and soil in decision-making for the location and siting of renewable energy provision. This has the potential to support the protection of high-quality agricultural land, although it is recognised that both options will inevitably lead to some loss of land (until the site is restored to its previous use at the end of its lifecycle).
- Infrastructure delivery – the Council is working jointly with the Oxfordshire authorities to update the 2016 OxIS evidence to help prioritise infrastructure investment across the County, and how best to deliver it. The Oxfordshire Plan consultation document (2021) highlights the importance of considering future infrastructure needs and land use implications to support a sustainable spatial strategy for Oxfordshire. It is considered that this approach should be replicated at the local scale, and therefore the option of *"updating the methodology to consider social and environmental benefits of schemes and the contributions they make to climate action and healthy place shaping..."* is supported.

2.16.5 In conclusion:

- Employment land spatial strategy could well have significant implications for loss of best and most versatile agricultural land, noting that agricultural land quality varies significantly across the District.
- There is also strong support for housing within town centres, and wider urban areas, from a perspective of wishing to minimise pressure on the agricultural land resource.

2.17 Landscape

SA objective: [Protect and enhance landscape character and the district's countryside](#)

- 2.17.1 Cherwell's landscape is largely rural in character with much of the northern part of the District consisting largely of soft rolling hills. The southern half of the district is much flatter, while the northwest lies at the northern edge of the Cotswolds. The valleys of the District's two main rivers – the Cherwell and the Ray – along with their tributaries, are key features that underpin landscape character, and settlement pattern.
- 2.17.2 While there are no National Parks within the District, the Cotswolds Area of Outstanding National Beauty (AONB) intersects the north-west of the District, and the River Cherwell / Oxford Canal corridor is widely recognised as valued landscape. It is also important to note that approximately 14% of the District lies within the Oxford Green Belt, including land surrounding Kidlington.
- 2.17.3 While the Options Paper does not set out explicit options in relation to the landscape at the District level, options of note are those presented in relation to **Biodiversity**. The Oxfordshire State of Nature report (2017) found that there continues to be long-term declines in farmland and woodland biodiversity throughout the Oxfordshire, and that there is continued fragmentation and loss of connectivity across the county's landscape, affecting the future viability of habitats and species. Such issues of fragmentation and ecological connectivity will likely be a focus of the forthcoming Local Nature Recovery Strategy, and there will be much potential to integrate wide-ranging 'landscape' considerations as part of the Strategy. On this basis there, is support for the option of prioritising biodiversity efforts within Conservation Target Areas, although it is recognised that there is also merit to focusing biodiversity efforts close to development locations, from a landscape perspective, recognising that development locations will often be at the edge of existing settlements, and settlement-edge landscapes are highly valued by local residents.
- 2.17.4 It is also important to discuss the **Natural capital** options presented, recognising that delivering biodiversity and wider environmental net gains has the potential to help conserve and enhance landscape character, including its special qualities and sense of place. The option to *"require environmental net gain to be demonstrated"* is therefore supported in respect of landscape objectives.
- 2.17.5 **Employment land** and **Renewable energy** strategy also clearly has implications for landscape objectives. In respect of employment land, the option to focus employment growth on *"previously developed land"* is supported, with all other options having the potential to lead to the loss of greenfield land, which may be sensitive in landscape terms, particularly around the urban fringes of Banbury and

Bicester.²² With regards to renewable energy, it is difficult to identify which option is preferable, with a middle ground strategy (involving both allocations and criteria-based policy) potentially preferred.

2.17.6 Other options of note relate to:

- Infrastructure delivery - the option to “*explore a methodology which considers the wider context of social and environmental benefits of infrastructure and the contribution of infrastructure schemes to [...] Healthy Place shaping*” is supported, recognising that healthy place shaping includes “*fostering well-designed beautiful and safe places that support communities’ health, social and cultural well-being*” (NPPF, 2021). Recognising that the visual appearance and attractiveness of towns and villages is strongly influenced by green space,²³ it will therefore be important for the local plans to contain relevant and effective measures to support a network of healthy places. It is noted that setting county-wide principles, such as those currently included within the Oxfordshire Plan consultation document, will not prevent local principles being established where would reflect the characteristics of the local population.
- Children’s play - the landscape of parks and open space areas contribute to the quality and attractiveness of the urban environment, and therefore the option to “*... integrate play facilities throughout towns and developments identifying minimum standards and setting expectations through design and other place making policies e.g. inclusion of pocket parks, play streets and informal play with open space areas*” is supported.

2.17.7 In conclusion:

- There is much potential to realise landscape objectives as part of an integrated strategy that takes account of wide-ranging objectives, including biodiversity, heritage and other wide-ranging natural capital. Cherwell is considered well suited to an integrated strategy of this nature, recognising the potential to identify large-scale distinctive landscape character areas, for example the Cherwell valley.
- Employment land strategy has clear implications for landscape objectives, including because of locational factors (e.g. proximity to transport routes) and the demand for warehouses, and renewable energy strategy also potentially has landscape implications.

2.18 Poverty, disadvantage and social exclusion

SA objective: Reduce poverty and social exclusion

2.18.1 Deprivation is relatively low across Oxfordshire. However, there are areas of persistent deprivation with the most widespread deprivation factor in Oxfordshire relating to barriers to housing and services. The main settlements have benefitted from investment in infrastructure and affordable housing over a number of years and although deprivation and inequalities exist within these communities (notably in parts of Banbury), rural areas have in many cases become increasingly isolated, particularly with the removal of public transport services and restricted growth. It is further considered that COVID-19 is likely to have amplified deprivation and education inequalities.²⁴

2.18.2 Poverty, disadvantage and social exclusion are highly cross-cutting issues, such that options across a wide range of policy areas could lead to implications; however, one immediate stand-out consideration is the importance of high-quality **housing**. A number of the options presented are positive, from a poverty, disadvantage and social exclusion perspective, including the option of increasing the percentage requirement of affordable housing required on qualifying sites, and the option of introducing “*a policy which requires all new dwellings to meet the nationally described space standard...*” The option of introducing accessibility standards for a proportion of new homes is also of note, as the effect would be to assist older and disabled people to remain living independently in their own homes.

²² <https://www.cherwell.gov.uk/info/84/evidence-for-adopted-local-plan-part-1/222/environmental-and-energy-evidence/5>

²³ https://moderngov.lambeth.gov.uk/%28S%280cmzi2vta2o4ow55m5w2s455%29%29/documents/s56922/02%20value_of_green_space_report1.pdf

²⁴ https://www.oxfordshirelep.com/sites/default/files/uploads/Oxfordshire%20ERP%20Action%20Plan%20-%20FINAL%20%2826th%20February%202021%29_0.pdf

- 2.18.3 Secondly, there is a need to discuss the **Town centres and retail** options. There is a need to carefully manage change within town centres, recognising the national focus on strengthening local networks and enabling the delivery of important services to meet local needs. This may include ensuring day-to-day needs are met, as well as some level of care and support for vulnerable people locally. Such options could also support older people to remain living at home, connected in their local communities. The Options Paper recognises that “by designing for the most vulnerable, places can be inclusive and attractive for everyone.” This supports the ‘Good growth in Oxfordshire’ ambition set out in the Oxfordshire Strategic Vision adopted by each of the partner councils in Oxfordshire.²⁵
- 2.18.4 Proposed options in respect of **Employment land** are also of note, given the links between deprivation and access to good jobs, and recognising that, compared to Oxfordshire as a whole, a larger proportion of Cherwell’s jobs are in retail, leisure and hospitality with a smaller number in the scientific, technical and education sector. In this light, there is support for the option of focusing new employment “*at the main urban centres*” given the potential to deliver new jobs in proximity to areas of relative deprivation. Additionally, focusing employment growth at “*transport nodes and less sustainable areas*”, and “*the larger villages*” is supported, as it would contribute towards addressing rural deprivation and inequalities by improving access to services, facilities, homes and jobs in the less urban/ rural areas.
- 2.18.5 A wide range of other options could potentially lead to indirect effects:
- Infrastructure delivery - in relation to Cherwell’s IDP, the option to “*update the methodology to consider social and environmental benefits of schemes and the contributions they make to Climate Action, Healthy Place Shaping, and a Sustainable Economy*” is supported. This will contribute positively towards the objective to “*coordinate the identification and provision of infrastructure to support a successful sustainable economy which will help to... address social inequalities.*”
 - Employment land - support is given to the option to “*provide a mixture of mixed use and specific use sites depending on the location*” given the need to protect existing communities while providing flexibility where opportunities exist. This has the potential to support low levels of poverty and high levels of inclusivity if uses are prioritised in the right locations, supporting accessibility to employment for all.
 - Rates of affordable housing - there is a considerable need for affordable housing in the District with over 1,500 active applications on the Cherwell housing register in April 2021, an increase from the 1,300 housing register applicants in April 2020. The Options Paper recognises the need to do more to deliver affordable housing to provide equal opportunities, and therefore support is given to the option to “*increase the percentage requirements of affordable housing required on housing developments of 10 or more units*”. This will better support people who can’t afford access to the housing market, and those in low paid jobs, reflecting the priorities of the Oxfordshire Plan (see consultation document 2021).
 - Affordable housing tenure - the Oxfordshire Plan consultation document (2021) seeks to secure the retention of young people and the ‘less well-off’ through the proposed adequate provision of affordable housing and to secure sufficient provision for older people too, through extra care, care villages and other types of provision. These priorities are reiterated through the Options Paper reflecting local circumstances with the option to “*increase social housing above other affordable housing*” supported as it will increase support for people with the most serious needs, and can offer greater security than other affordable housing tenures included within the wider definition as set out with the NPPF.
 - Housing accessibility - between 1998 and 2018 Cherwell has seen a significant increase in the older 65+ population, with Cherwell’s Housing Strategy 2019-2024 aiming to support and meet the increasing demand for adaptations for assisting older and disabled people to remain living in their own homes. The option to “*introduce accessibility standards for a proportion of new homes*” is therefore supported, given it would help to support the Housing Strategy as well as improve accessibility to homes for all residents.
 - Housing internal space standards - the Nationally Described Space Standard (NDSS) (2015) include standards for indoor space, and for accessibility and adaptability of new homes, to improve the quality of life for residents and address inequality. Cherwell’s challenging housing market is reflected through the Options Paper and Tenancy Strategy (2017), with social deprivation and poverty seen in pockets of the District. The option to “*introduce a policy which requires all new dwellings to meet the nationally described space standard*” is therefore supported, contributing positively towards regenerating more deprived neighbourhoods, and supporting equal opportunities throughout the District.

²⁵ <https://www.oxfordshiregrowthboard.org/projects/oxfordshire-strategic-vision/>

- Digital infrastructure - the Options Paper highlights a key objective for Maintaining and Developing a Sustainable Local Economy as “*Support resilient, market-leading digital connectivity across the whole District and facilitate the trend towards increased home working*”, particularly in rural areas where digital poverty is an issue. This reflects the findings of Oxfordshire’s Economic Recovery Plan (2021), which highlights that digital skills are in high demand and are increasing with more home working. The Recovery Plan seeks to combat digital poverty through targeted skills and finance support that is integrated into existing outreach activities in Oxfordshire’s most deprived communities. Ensuring that homes have access to high-quality digital provision will therefore improve access to employment, while also addressing inequalities through reducing the need to travel, and the need for office space and ensure that the benefits of economic growth address existing inequalities. All options are therefore supported and should not be seen as mutually exclusive.
- Children’s play – as previously noted, research²⁶ suggests the traditional approach to play areas do not offer enough opportunities for creative play, particularly for younger children or, in for older children they can exclude some groups. This can be particularly acute in areas that suffer disadvantage. The approach seeking to utilise “*opportunities to integrate play facilities throughout towns and developments identifying minimum standards and setting expectations through design and other place making policies e.g. inclusion of pocket parks, play streets and informal play within open space areas*” is therefore supported, given it will create ‘play friendly’, inclusive environments throughout developments and increase opportunities to access a variety of facilities.
- Outdoor sports provision - the Options Paper sets out the following objective for healthy place shaping: “*Provide sufficient accessible, well maintained good quality services, facilities and infrastructure, including green and blue infrastructure, to meet health, education, transport, open space, sport, recreations, cultural, social and other community needs, reducing social exclusion and poverty, addressing inequalities in health, and maximising well-being.*” Under this objective, the following options are supported as they will likely improve accessibility to sports facilities for all, supporting the delivery of connected, healthy places: “*secure and establish sports hubs at main settlements*”; “*use financial contributions from developers in lieu of on-site provision on strategic sites to enhance existing facilities, to enable increased use*” However, concern is raised regarding the option to “continue the current policy approach of securing new pitch provision as part of strategic development sites”, as this has been seen to result in fragmented sports provision with poor quality underused pitches, and associated issues.
- Sustainable construction - the Oxfordshire Plan consultation document (2021) places an emphasis on achieving high design standards for new development, which are recognised as being essential for reducing inequalities as well as having positive environmental impacts. This is linked to the delivery of high-quality, energy efficient housing, which will support good physical and mental health through creating healthy indoor living environments with healthy air temperatures, humidity levels, noise levels, and improved air quality. This has particular potential to benefit disadvantaged groups with poor health, including older people or disabled people. The option to “*Set sustainable design and construction standards for residential and non-residential development in Cherwell above those required by Central Government*” is therefore supported, recognising that this will help to address inequalities while also reducing energy costs, which will in turn help address poverty in the long term. However, whilst increased energy efficiency in new housing will bring a range of benefits for the quality of life of residents, as set out through the Options Paper, there is potential for a stricter policy to affect the deliverability and viability of new developments.

2.18.6 In conclusion:

- A wide range of policy options could lead to effects. The great majority of policy options presented within the Options Paper could lead to positive effects, perhaps most notably those around housing and town centres, although certain options give rise to a degree of concern, notably focusing employment land “mostly on previously developed land, including in less sustainable locations”.

2.19 Transport

- 2.19.1 Cherwell has excellent transport links, including the M40 motorway and direct rail links from Banbury and Bicester to London, Birmingham and Oxford. The rail link from Oxford to Bicester has recently been upgraded as part of wider East West Rail Project, and a new station at Water Eaton (Oxford Parkway) linking Oxford and London Marylebone via Bicester opened in 2015.

²⁶ See for example: Reclaiming Play in Cities (2021) by the Real Play Coalition in collaboration with the RTPi

- 2.19.2 The District Council must work closely with Oxfordshire County Council on transport strategy, as well as England's Economic Heartland, which is a sub-regional organisation that provides strategic direction on transport planning across an area stretching from Swindon to Cambridgeshire. A key consideration for strategic transport planning is around focusing growth and, in turn, investment along strategic corridors, and a series of corridor strategies and place strategies are currently in preparation to support updates to the Local Transport and Connectivity Plan.
- 2.19.3 The Options Paper does not present specific transport options for the whole district noting that it is unlikely there will be a 'one size fits all' approach to how we travel in future and that the policy approaches for the towns are unlikely to be the same as those required in the rural areas. However, policy options in respect of **Employment land**, **Town centres** and **Digital infrastructure** all have the potential to impact on the need to travel, the modes of travel and the potential to decrease car traffic on problematic parts of the road network. These matters have already been discussed above, for example under Air quality, and are not repeated here, for brevity. The policy options around **Infrastructure delivery** are also of note, recognising that adjusting the IDP methodology to take greater account of "health place-shaping" could lead to an added emphasis on supporting active travel options.
- 2.19.4 In conclusion:
- Employment land must be in accessible locations, as far as possible, and in locations where the effect will not be to increase traffic (including HGVs) on problematic parts of the road network.
 - There is a need to carefully consider the movement and transport implications of changing strategy for town centres, recognising that these tend to be the most accessible parts of the District.
 - A positive approach to enhancing digital infrastructure is strongly supported, from a transport perspective, given the potential to capitalise on recent home working trends.
 - A change in emphasis as part of infrastructure delivery planning, to ensure that healthy place-shaping is a priority, is potentially supported from a transport perspective.

2.20 Waste

SA objective: Reduce waste generation and disposal, and achieve the sustainable management of waste.

- 2.20.1 Oxfordshire's Resources and Waste Strategy 2018-2023 has been developed on behalf of all Oxfordshire local authorities through the Oxfordshire Environment Partnership and focusses on Local Authority Collected Waste (N.B. waste disposal is covered by the County's Waste Core Strategy). In 2018/19, the District produced 60,508 tonnes of household waste, of which 54% was sent for reuse, recycling or composting. This compares to an average of 42% for all local authorities in England. The latest district recycling rates rank Cherwell District 44 out of 326 local authorities in England.²⁷ The Strategy aims to keep household waste growth to zero and increase the amount of household waste recycled to 70% by 2030.
- 2.20.2 Given the fairly limited scope of the Local Plan to address domestic waste (e.g. that arising from individual homes), the first options of note are in relation to **Sustainable construction**. As construction waste accounts for the largest proportion of waste within the Oxfordshire waste cycle, options regarding sustainable construction are relevant to the 'Waste' topic, with support given to "*setting design and construction standards above those required by Central Government*". While it is recognised that housing growth locally will lead to waste that needs to be managed locally, there are also opportunities for incorporating sustainable waste management practices, such that per capita waste decreases. Further support is therefore given to the option of "*setting design and construction standards above those required by Central Government*".
- 2.20.3 Secondly, there is a need to touch on the **Employment land** options, recognising that where development is proposed on brownfield land there may be opportunities for re-using existing buildings and materials. While there is a level of uncertainty on potential for positive effects depending on the previous use of the site, the option to focus development "*mostly on previously developed land, including in less sustainable locations*", is supported from a waste perspective.

²⁷ https://lginform.local.gov.uk/reports/lgastandard?mod-metric=110&modarea=E07000177&mod-group=A11LInCountry_England&mod-type=namedComparisonGroup

2.20.4 In conclusion:

- The option of setting design and construction standards above those required by Central Government is supported, in addition to the option to focus employment development on previously developed land.

2.21 Water

SA objective: Maintain and improve water quality and resources.

2.21.1 A key issue for many Local Plans is distributing housing growth to locations where there is headroom capacity at Wastewater Treatment Works (WWTWs), or where there is confidence in the ability to fund and deliver timely upgrades to WWTWs. However, beyond this, there are wide-ranging other considerations for Local Plans, in respect of water resource and water quality objectives. In particular, there is a need to consider setting stringent development management policies (both district-wide and area/site specific) around water efficiency, Sustainable Drainage Systems (SuDS) and local sewer infrastructure. A further consideration, which is increasing in prominence nationally, is the need to take account of rivers and catchments where nitrate pollution is placing a strain on the functioning of internationally aquatic and/or important wetland ecosystems, although it is not clear the extent to which this is an issue for Cherwell.

2.21.2 The recent Oxfordshire Plan consultation document (2021) includes a draft policy on water efficiency and water quality, and also explains that: *“An Oxfordshire focused Water Cycle Study is also being undertaken to inform the production of the Oxfordshire Plan. The Phase 1 Water Cycle Study sets out baseline information on water quality in Oxfordshire and considers, at a high level, the potential impacts of growth. A more detailed Phase 2 Water Cycle Study will be undertaken to help inform the next stages of the plan-making process. It will help to inform where growth is proposed in Oxfordshire and the infrastructure needed to support and mitigate it.”*

2.21.3 For the Cherwell Local Plan Review, a key priority will be to take account of the findings of the Oxfordshire Water Cycle Study, as well as any additional work undertaken at a more local scale. There will also be a need to consider the cost/viability implications of setting water efficiency standards above those required by building regulations. A key consideration will be whether to require that new homes achieve a minimum water efficiency of at least 110 litres per person per day, in line with the Government’s Housing Optional Technical Standard. There can also be the potential to support or require achievement of credits for water efficiency through certification schemes, for example HQM (residential) and BREEAM (non-residential) certification schemes; however, there is a need to avoid creating an overly complex policy environment.

2.21.4 In conclusion,

- The Options Paper has limited implications for water resources or water quality, given the current available evidence, hence this will need to be a focus of further detailed work ahead of preparing a draft plan for consultation.

3 Banbury

3.1 Introduction

3.1.1 The aim here is to explore options for Banbury.

3.2 Approach and methodology

3.2.1 The Options Paper presents four sets of options for Banbury, covering: Housing and employment growth; Directions for development; Banbury town centre (Article 4 Directions); and Banbury Canalside. However, for the purposes of SA at this stage, it is considered appropriate to define and appraisal a single set of mutually exclusive early, and high-level alternative options, with a view to informing debate and future decisions regarding growth and reasonable alternatives. For the purposes of SA, the following alternatives were defined:

- Option 1 (**lower growth**) – would still involve housing growth in the plan period, in addition to that which is already committed. Given that Banbury is one of the largest settlements, this could include non-strategic urban extensions together with urban infill or other small sites. A lower growth strategy could also mean aiming to restrict housing growth in the town centre, in order to prioritise and protect other town centre uses. It could translate into a reduced level of housing at Banbury Canalside and other larger town centre or edge of centre sites.
- Option 2 (**higher growth**) – would likely involve one or more strategic urban extensions and/or a new settlement closely linked to the town. A higher housing growth strategy could also translate as support for changes use to residential within the town centre (e.g. higher densities) and predominantly housing focused schemes at Banbury Canalside or other larger town centre and edge of centre sites.

3.2.2 An appraisal of these alternatives is presented below in an appraisal 'matrix'. Within each of row of the matrix, the aim is to explore the merits of the alternatives in respect of one aspect of the SA framework (see Appendix I). Specifically, within each row, the aim is to both A) rank the alternatives in order of preference, with "=" used where it is not possible to meaningfully differentiate the alternatives, and "?" used to highlight uncertainty; and B) predict 'likely significant effects' on a five point scale.²⁸

3.3 Appraisal findings

3.3.1 Appraisal findings are presented in the appraisal matrix below.

Table 3.1: Appraisal of initial growth scenarios for Banbury

Topic	Option 1: Lower growth	Option 2: Higher growth
	Rank of preference and categorisation of effects	
Air and wider environmental quality	?	?
Biodiversity	?	?
Climate change mitigation	2	★1
Climate change adaptation	=	=
Communities	=	=
Crime	=	=
Digital infrastructure	=	=

²⁸ Red indicates a significant negative effect; amber a moderate or uncertain negative effect; no colour indicates neutral or uncertain effects; light green indicates a moderate or uncertain positive effect; and dark green indicates a significant positive.

Education and skills	2	★1
Employment	2	★1
Economic growth		
Flood risk	★1	2
Health	=	=
Historic environment	★1	2
Homes	?	?
Land and soils	★1	2
Landscape	★1	2
Poverty, disadvantage and social exclusion	?	?
Transport	?	?
Waste	=	=
Water	=	=

The appraisal finds Option 1 (lower growth strategy) to perform better in terms of more sustainability topics than is the case for Option 2 (four topics versus three); however, this does not necessarily serve to indicate that Option 1 is best performing overall. This is because no weight is assigned to any of the objectives (i.e. no objective is assumed to be of greater importance than any other), nor are the objectives assumed to have equal weight.

Broadly speaking, Option 1 is preferable in respect of certain environmental topics, where Banbury is relatively constrained, or faces particular growth-related issues. As for Option 2, this is supported in respect of topics where there is an opportunity for growth to support investment in infrastructure (particularly transport and community infrastructure, but also low carbon) and/or support delivery of a strategic mixed use sites, to include employment land; however, it is recognised that the potential for higher growth to achieve 'planning gain' is highly uncertain at this early stage.

Having made these introductory remarks, the following bullet points cover those topics in terms of which it is possible to reach substantive, meaningful conclusions:

- **Air quality** – is a significant issue in Banbury, with two designated AQMAs, including one affecting the town centre. The Community Involvement Paper (2020; see paras 2.58-60) explains that issues stem from the layout of the strategic road network, and the earlier Masterplan SPD (2014) identified relief road options, with a view to improving the network. On this basis, there is an argument for higher growth in support of new/improved transport infrastructure; however, equally, a higher growth strategy could serve to increase traffic pressure on constrained parts of the network, potentially with significant air quality implications.
- **Biodiversity** – the town does not stand-out as highly constrained in biodiversity terms. The key asset is the Cherwell / Oxford Canal corridor, in particular the areas of priority habitat to the northeast and southeast of the town. On one hand, a higher growth strategy could fund strategic enhancements to this corridor, including through the urban area where there is currently very limited priority habitat. However, on the other hand, the potential for growth to impact on sensitive parts of the river corridor (either directly or indirectly, e.g. as a result of new road infrastructure) can be envisaged, plus expansion in other directions could lead to encroachment towards sensitive parklands/former parklands associated with wood pasture priority habitat and/or small woodland priority habitat patches (albeit there is virtually no ancient woodland in this part of the District).
- **Climate change mitigation** – in respect of greenhouse gas emissions from transport, growth at Banbury could support objectives to minimise per capita emissions given the town's employment and community infrastructure offer and rail connectivity; however, there is some uncertainty given the motorway connectivity, and the prevalence of commuting long distances by car to regional employment centres.

With regards emissions from the built environment, a higher growth strategy could involve a strategic urban extension that supports investment in low carbon infrastructure and/or building-level emission standards that go beyond Building Regulations. Additionally, a higher growth strategy within the town centre / urban area could well be supportive of heat networks, which require high densities and a fine grained mix of uses.

- **Climate change adaptation** – focusing on non-flood risk issues, a key consideration is the risk of overheating within homes given the likelihood of increased heat wave frequency in the future. In this respect, a growth strategy that supports higher housing densities within the town centre potentially gives rise to a degree of concern as tall buildings can lead to challenges in respect of solar gain (and necessitate air conditioning), and higher densities could be at the expense of areas of green space that provide shading and serve to mitigate the urban heat island effect. However, these considerations are highly uncertain, with best practice evolving in respect of master planning and design so as to minimise the risk of overheating.
- **Communities** – a range of important ‘communities’ considerations are discussed under more specific topic headings below. Broadly speaking, there are identified needs for regeneration within certain parts of Banbury, which can be a reason to support a higher housing growth strategy that will, in turn, maximise the potential for investment in infrastructure, including community and green infrastructure. However, it is difficult to suggest that this is a strong reason for exploring higher growth options for the town, as regeneration objectives within the urban area could be achieved as part of an overall lower growth strategy.
- **Education and skills** – the options document identifies a potential need for a new secondary school at Banbury, which is a key reason to explore higher growth strategy options. A larger scale strategic urban extension could well provide land for a new secondary school to serve existing communities as well the new community.
- **Employment and economic growth** – Banbury is an important centre of employment and economic growth reflecting its transport links and good connectivity to Oxford, Silverstone and the West Midlands. On this basis, there is an argument for supporting housing growth at Banbury with a view to ensuring a suitably skilled local workforce. Furthermore, a higher housing growth strategy could support mixed use sites (i.e. sites that deliver both housing and employment), which are likely to be necessary in order to ensure a good mix of new employment land (in addition to employment-only sites, typically in locations less suitable for housing). A further consideration is the possibility of a higher housing growth strategy for the town centre (also Canalside) conflicting with employment growth objectives, but this is uncertain.
- **Flood risk** - some developed areas of central Banbury along the route of the Cherwell are subject to flood risk, albeit this is virtually all flood risk zone 2. There is a need to take a sequential approach to avoiding housing growth in flood risk zones; however, it is anticipated that the unique opportunity to regenerate Canalside or other town centre sites close to the river could lead to an argument in favour of a housing- led development, despite the risks. There will be a need to strike a balance, for example by avoiding higher densities that could make it more challenging to design-out flood risk, and ensure safe access/egress in the event of a flood, hence it is considered appropriate to ‘flag’ a potential concern with a higher growth strategy.
- **Historic environment** – Banbury is sensitive in historic environment terms and further expansion of the town also risks encroachment on historic villages (mostly with designated conservation areas) and/or registered parks and gardens. As such, there is a concern with a higher growth strategy that would involve one or more strategic urban extensions, or a satellite new settlement, and could also involve higher town centre densities.
- **Homes** – there is currently limited evidence to suggest a *particular* housing need associated with Banbury (or a *particular* need for affordable housing); however, there will be a need to keep this under review. A further consideration is that strategic growth locations – e.g. a strategic urban extension or linked settlement – can lead to good potential to deliver a good mix of housing, potentially to include specialist housing; however, this is uncertain, and it is recognised that there are also ‘homes’ arguments for dispersing housing more widely.
- **Land and soils** – Banbury is strongly associated with better quality agricultural land, which is an argument for directing growth elsewhere, although it is not unusual to accept some loss of best and most versatile agricultural land in order to facilitate housing growth in locations that are otherwise suitable / sustainable.
- **Landscape** – Banbury is strongly influenced by the Cherwell valley, but has expanded westwards up the valley side and now risks ‘spilling’ out of the ‘bowl’. Equally, there is a risk of creep along the north/south axis of the valley, which is an inherently sensitive landscape. These factors lead to a concern with higher growth.
- **Transport** – there is a well understood opportunity for growth to facilitate new link / relief roads, to the benefit of Banbury’s strategic road network. However, equally, higher growth in the ‘wrong’ location could serve to load unsustainable pressure onto the already congested road network.

4 Bicester

4.1 Introduction

4.1.1 The aim here is to explore options for Bicester.

4.2 Approach and methodology

4.2.1 The Options Paper presents four sets of options for Bicester, covering Housing and Employment Growth; Directions for growth; Bicester town centre (Article 4 Directions); and Community & cultural facilities. However, for the purposes of SA, it was considered appropriate to define and appraisal a single set of mutually exclusive early, and high-level alternative options. The following alternatives were defined:

- Option 1 (**lower growth**) – could still involve some housing growth in the plan period, above that which is already committed to 2031. As the District's second largest settlement and given the town's strategic location within the Oxford to Cambridge (Ox Cam) Arc, lower growth might include one or more non-strategic urban extensions (or the release of further land associated with one current sites). A lower growth strategy could also mean aiming to restrict housing growth in and around the town centre (see discussion above, under Banbury).
- Option 2 (**higher growth**) – would likely involve strategic urban extensions and/or a new settlement closely linked to the town, in addition to schemes already committed or identified within the current Local Plan. A higher housing growth strategy could also translate into higher town centre housing growth (discussed above, under Banbury) and potentially growth to support strategic community/cultural facilities and additional economic development.

4.2.2 An appraisal of these alternatives is presented below in an appraisal 'matrix'. Within each of row of the matrix, the aim is to explore the merits of the alternatives in respect of one aspect of the SA framework (see Appendix I). Specifically, within each row, the aim is to both A) rank the alternatives in order of preference, with "=" used where it is not possible to meaningfully differentiate the alternatives, and "?" used to highlight uncertainty; and B) predict 'likely significant effects' on a five point scale.²⁹

4.3 Appraisal findings

4.3.1 Appraisal findings are presented in the appraisal matrix below.

Table 3.2: Appraisal of initial growth scenarios for Bicester

Topic	Option 1: Lower growth	Option 2: Higher growth
	Rank of preference and categorisation of effects	
Air and wider environmental quality	?	?
Biodiversity	★ 1	2
Climate change mitigation	2	★ 1
Climate change adaptation	=	=
Communities	=	=
Crime	=	=
Digital infrastructure	=	=
Education and skills	=	=

²⁹ Red indicates a significant negative effect; amber a moderate or uncertain negative effect; no colour indicates neutral or uncertain effects; light green indicates a moderate or uncertain positive effect; and dark green indicates a significant positive.

Employment	2	1
Economic growth		
Flood risk	=	=
Health	=	=
Historic environment	1	2
Homes	?	?
Land and soils	=	=
Landscape	=	=
Poverty, disadvantage and social exclusion	=	=
Transport	2	1
Waste	=	=
Water	=	=

The appraisal finds Option 2 (higher growth strategy) to perform best in terms of more sustainability topics than is the case for Option 1 (three topics versus two), and highlights a stand-out positive effect under Option 2 in respect of employment and economic growth; however, this does not necessarily serve to indicate that Option 2 is best performing overall (see discussion above, under Banbury).

Broadly speaking, Option 1 is preferable in respect of certain environmental topics, where Bicester is relatively constrained, or faces particular growth-related issues. As for Option 2, this is supported in respect of topics where there is an opportunity for growth to bring with it investment in infrastructure (notably transport related, but also low carbon); however, it is recognised that the potential for higher growth to achieve 'planning gain' is highly uncertain at this early stage.

Having made these introductory remarks, the following bullet points cover those topics in terms of which it is possible to reach substantive, meaningful conclusions:

- Air quality** – is a significant issue in Bicester, despite a near complete ring road (in contrast to Banbury), with an AQMA designated along much of the central corridor (Kings End, Queens Avenue and Buckingham Road), which was the historic route north-south through the town and, correspondingly, is narrow in places. There are strategic road infrastructure upgrade opportunities for the town, but a potentially overriding consideration is the need to deliver new walking and cycling infrastructure (including along the central corridor, and also to overcome the barrier presented by the ring road), and also support improved bus services (notably linking Bicester with nearby villages). The Options Paper presents a detailed discussion of issues and opportunities. Strategic growth could bring with it investment in support of achieving transport objectives for the town, and this could lead to air quality benefits (although the opportunity is perhaps not as clear as at Banbury); however, on the other hand, a higher growth strategy could serve to increase traffic pressure on constrained parts of the network, potentially with significant air quality implications.
- Biodiversity** – the landscape surrounding Bicester differs greatly to that which surrounds Banbury (discussed above) and, in turn, so do biodiversity issues and opportunities. At immediate consideration is the Upper Ray Meadows (and Bernwood Forest) Living Landscape, as defined by the Berks, Bucks and Oxon Wildlife Trust, to the south and southeast of the town; however, there is little reason to suggest significant growth in this direction (N.B. Glaven Hill, where a committed scheme is set to deliver a 2,100 home urban extension, is a sensitive location, in these terms). Elsewhere, the landscapes surrounding the town are characterised by a moderately high density of small woodland patches, including some small patches of ancient woodland, and including a notable concentration to the north of the town as well as areas of wood pasture priority habitat associated with parklands / former parklands, most notably at Bignell Park. It is difficult to pinpoint strategic biodiversity opportunities that might be realised under a higher growth scenario, short of a very high growth strategy that perhaps leads to major investment being directed to the Upper Ray Meadows (and possibly the Bernwood Forest beyond), and there is a concern regarding the towns expansion encroaching on sensitive habitats (woodlands, parkland and feasibly the Upper Ray Meadows). As such, it is considered appropriate to favour a lower growth strategy, from a biodiversity perspective. However, it is recognised that a higher growth strategy could involve a major focus on designing in the highest quality green and blue infrastructure within sites to link habitats, as well as supporting targeted offsite enhancements.

- **Climate change mitigation** – in respect of greenhouse gas emissions from transport, Bicester has historically been associated with high levels of out commuting by car, but a focus of the Core Strategy (2015) was to increase the local employment offer, and it is also fair to say that the town is very well connected by public transport, notably to Oxford, but soon also to Milton Keynes following completion of EWR Phase 2. However, walking and cycling connectivity within Bicester is an issue. In this light, continued strategic growth is tentatively supported, from a perspective of seeking to minimise transport emissions.

In respect of emissions from the built environment, a higher growth strategy could involve a strategic urban extension and/or a linked new settlement that delivers ambitious measures aimed at minimising per capita emissions, building on the experiences of recent and committed urban extensions, notably the Northwest Bicester Eco Town. In this light, there is support for exploring higher growth options.

- **Climate change adaptation** – focusing on non-flood risk issues, a key consideration is the risk of overheating within homes, given the likelihood of increased heat wave frequency in the future. In this respect, a growth strategy that supports higher housing densities within the town centre potentially gives rise to a degree of concern, as tall buildings can lead to challenges in respect of solar gain (and necessitate air conditioning), and higher densities could be at the expense of areas of green space that provide shading and serve to mitigate the urban heat island effect. However, the considerations are highly uncertain, with best practice evolving in respect of how-to masterplan and design so as to minimise the risk of overheating.
- **Communities** – again, the situation is notably different to that at Banbury. There are opportunities for growth-related investment to address existing needs for community and green infrastructure, but there are no ‘stand-out’ opportunities (as currently understood), with it generally being the case that recent committed and urban extensions have involved a focus on delivering new community and green infrastructure alongside housing. A key consideration is potentially delivering strategic enhancements to walking and cycling infrastructure, as discussed above, and to improve inter connectivity. There will be a need for further work to understand the ‘communities’ related growth opportunities that exist.
- **Education and skills** – it is fair to assume that strategic growth would deliver new school capacity that not only ‘consumes the smoke’ of the new communities, but also benefits existing communities; however, there are not currently known to be any existing major issues in respect of school or college capacity at Bicester.
- **Employment and economic growth** – Bicester is strategically located within the Oxford Knowledge Spine, and is also very well linked to Milton Keynes, Silverstone and further afield via road and rail. For these reasons, and other reasons besides (see discussion above, under Banbury) there is support for exploring higher housing growth options, from an employment/economy perspective.
- **Flood risk** – parts of east and southeast Bicester are constrained by flood risk, plus there is extensive flood risk to the southeast of the town. However, there is little reason to suggest that a higher housing growth strategy would lead to pressure to consider housing growth within a flood risk zone. Recent and committed growth is primarily focused to the west and north of the town, where there is little flood risk.
- **Historic environment** – given the relatively flat topography, and relative lack of major features to bound growth in the long term, there is a notable concern regarding the town expanding such that it encroaches upon, or surrounds, nearby historic villages, hamlets and farmsteads, and/or historic stately homes with associated parks/gardens. There is also a notable density of scheduled monuments to the south of the town.
- **Homes** – there is currently limited evidence to suggest a *particular* housing need associated with Bicester (or a *particular* need for affordable housing); however, there will be a need to keep this under review. A further consideration is that strategic growth locations – e.g. a strategic urban extension – can lead to good potential to deliver a good mix of housing, potentially to include specialist housing; however, this is uncertain, and it is recognised that there are also ‘homes’ arguments for dispersing housing more widely.
- **Land and soils** – the low resolution national agricultural land quality dataset shows Bicester as predominantly associated with grade 3 quality land, which may or may not be ‘best and most versatile’; however, parts of the town’s perimeter have been surveyed in detail, and found to be comprise grade 3b quality land, which is not classified as best and most versatile. On this basis, it is not appropriate to favour lower growth.
- **Landscape** – the landscape surrounding Bicester does not stand-out as sensitive, in the Cherwell context; however, this does not mean it is not important and there are concerns regarding unchecked ‘sprawl’, as discussed above under Historic environment.
- **Transport** – as discussed above, under Air quality, there are significant transport infrastructure opportunities that could be realised under a higher growth scenario. As well as new road infrastructure, growth could serve to deliver strategic upgrades to walking and cycling infrastructure and/or improved bus services.

5 Kidlington and surrounding villages

5.1 Introduction

5.1.1 The aim here is to explore options for Kidlington and the surrounding villages. This area is broadly the geographical area covered by the Partial Review of the 2015 Local Plan.

5.2 Approach and methodology

5.2.1 The Options Paper presents three sets of options for Kidlington and surrounding villages, covering Kidlington centre, employment and greenspace; however, for the purposes of SA, it was considered appropriate to define and appraisal a single set of mutually exclusive early, and high-level alternative options. The following alternatives were defined:

- Option 1 (**lower growth**) – would involve limited housing growth, given the location within the Green Belt and the level of committed growth,³⁰ however, there could be a need to support continued employment growth, given the existing employment cluster and Kidlington’s strategic location within the Oxford Knowledge Spine.
- Option 2 (**higher growth**) – would likely involve some limited additional housing growth (e.g. infill), but the focus (it is assumed, for the purposes of this appraisal) would be an added emphasis on employment growth, to include Green Belt release. There could also be steps taken to expand Kidlington village centre and/or deliver new strategic green infrastructure, which would likely include enabling housing development.

5.2.2 An appraisal of these alternatives is presented below in an appraisal ‘matrix’. Within each of row of the matrix, the aim is to explore the merits of the alternatives in respect of one aspect of the SA framework (see Appendix I). Specifically, within each row, the aim is to both A) rank the alternatives in order of preference, with “=” used where it is not possible to meaningfully differentiate the alternatives, and “?” used to highlight uncertainty; and B) predict ‘likely significant effects’ on a five point scale.³¹

5.3 Appraisal findings

5.3.1 Appraisal findings are presented in the appraisal matrix below.

Table 3.3: Appraisal of initial growth scenarios for Kidlington and surrounding villages

Topic	Option 1: Lower growth	Option 2: Higher growth
	Rank of preference and categorisation of effects	
Air and wider environmental quality	?	?
Biodiversity	★ 1	2
Climate change mitigation	=	=
Climate change adaptation	=	=
Communities	=	=
Crime	=	=
Digital infrastructure	=	=
Education and skills	=	=

³⁰ The Cherwell Local Plan Partial Review (2020) directs 4,400 homes to North Oxford, Kidlington, Begbrooke and Yarnton.

³¹ **Red** indicates a significant negative effect; **amber** a moderate or uncertain negative effect; no colour indicates neutral or uncertain effects; **light green** indicates a moderate or uncertain positive effect; and **dark green** indicates a significant positive.

Employment	2	★1
Economic growth		
Flood risk	=	=
Health	=	=
Historic environment	=	=
Homes	=	=
Land and soils	★1	2
Landscape	★1	2
Poverty, disadvantage and social exclusion	=	=
Transport	=	=
Waste	=	=
Water	=	=

The appraisal finds Option 1 (lower growth strategy) to perform best in terms of more sustainability topics than is the case for Option 2 (three topics versus one); however, this does not necessarily serve to indicate that Option 1 is best performing overall (see discussion above, under Banbury).

Broadly speaking, Option 1 is preferable in respect of certain environmental topics, where the Kidlington area is relatively constrained, or faces particular growth-related issues. As for Option 2, this is supported in respect of 'economy and employment' objectives, because there is a well understood growth opportunity.

Having made these introductory remarks, the following bullet points cover those topics in terms of which it is possible to reach substantive, meaningful conclusions:

- **Air quality** – there is one designated AQMA at Kidlington; in addition, the village is in close proximity to the city-wide Oxford AQMA. A higher growth strategy at Kidlington, even if focused on employment growth, could lead to additional car movements within these AQMAs, although public transport and cycling links between Oxford and Kidlington are set to improve significantly, notably with a bus rapid transit (BRT) route along the A4260 corridor, supported by a dedicated (segregated) Super Cycleway into Oxford (over the A34).
- **Biodiversity** – the Kidlington area is inherently quite sensitive in biodiversity terms, given the Oxford Canal / Rowel Brook corridor to the west (associated with Rushy Meadows SSSI), the River Cherwell corridor to the east (although there is limited wetland priority habitat in this area), and with land to the west of Begbrooke rising to an important woodland complex. There is also a need to consider the proximity of Oxford Meadows SAC, which is sensitive to recreational pressure, air pollution and impacts to water quality and the water flow regime. For these reasons, and noting the level of committed growth, it is fair to highlight a concern with any higher growth option, albeit it is noted that the Science Park and Oxford Airport area, to the northwest of Kidlington, is associated with relatively limited sensitivity (although Rushy Meadows SSSI is a constraint).
- **Climate change mitigation** – the discussion above, under Banbury and Bicester, has focused on the potential for strategic growth to support efforts to reduce/minimise per capita greenhouse gas emissions from transport and the built environment. However, in the case of Kidlington, the assumption is that any higher growth scenario would likely be predominantly focused on employment growth, so there is not the same opportunity through the Local Plan Review in isolation to achieve this. Nevertheless, when taken with the existing housing allocations there may be some opportunities particularly to increase walking and cycling to employment destinations and improving sustainable transport links into Oxford.
- **Climate change adaptation** – the discussion above, under Banbury and Bicester, has focused on the risk of higher density housing in the respective town centres giving rise to urban heat island and overheating risks; however, there is not likely to be a similar concern at Kidlington and the surrounding villages.
- **Communities** – the Options Paper discusses two particular community infrastructure-related priorities. Firstly, there is the option of expanding the village centre, and secondly the Parish Council has an ambition to significantly enhance the green and blue infrastructure network within and surrounding Kidlington. There could be increased potential to realise these opportunities under a higher growth scenario; however, there is little certainty, particularly given the assumption of any higher growth scenario being predominantly employment focused.

With regards to enhancing the green/blue infrastructure network, this area is predominantly covered by the Green Belt designation which places limitations on potential locations for development. There is, however, an opportunity to consider enhancement of this area. This could necessitate demonstrating added value in terms of natural capital and ecosystem services, for example habitat creation, flood water attenuation and managed access as well as the links and benefits for active communities. However, achieving these natural capital and ecosystem services could involve significant costs, hence the potential to explore how ambitions can be supported by growth.

- **Employment and economic growth** – the Kidlington area is strategically located within the Oxford Knowledge Spine which forms a core component of the Ox-Cam Arc. There are key employment clusters at London-Oxford Airport / Begbroke Science Park / Langford Lane industrial estate. On this basis, there is a reason to explore higher growth options to continue to support economic development in this location.
- **Flood risk** – Kidlington is located between two river corridors, hence there are sensitivities, from a flood risk perspective, plus there is a need to consider the risk of growth leading to increased rates of surface water runoff that, in turn, increase downstream flood risk. Having said this, development with Sustainable Drainage Systems (SuDS) can serve to reduce runoff rates, relative to certain agricultural uses, and growth can deliver or facilitate delivery of strategic flood storage areas or other water attenuation measures (e.g. targeted woodland planting). On balance, and noting the focus on employment land, it is not clear that a higher growth option gives rise to any particular concerns at this stage.
- **Historic environment** – the primary Kidlington Conservation Area (Church Street) is notably located at the northern extent of the village, associated with the River Cherwell, with the Begbroke Conservation Area located to the west of the A44. There is no designated conservation area at Yarnton, although the Oxford Canal Conservation Area (which bisects the entire area) is nearby. In short, there are sensitivities, perhaps most notably Kidlington Church Street Conservation Area, with its prominent grade 1 listed church; however, land in the vicinity of the main employment cluster, to the northwest of Kidlington, is relatively unconstrained, bar a need to consider any risk of long term expansion towards Woodstock and Blenheim Palace.
- **Homes** – the area is set to grow significantly through committed schemes (i.e. those allocated within the Cherwell Local Plan Partial Review). At present, it is unknown how housing will be distributed across Oxfordshire and it is envisaged that the requirements and apportionment between districts will be dealt with via the Oxfordshire Plan process. As such, it is difficult to suggest that higher growth is a preferable option.
- **Land and soils** – the low resolution national agricultural land quality dataset shows the Kidlington area to be predominantly be associated with grade 3 quality land, which may or may not be ‘best and most versatile’. On this basis, and taking a precautionary approach, it is appropriate to highlight the merit of lower growth.
- **Landscape** – the landscape surrounding Kidlington and surrounding villages is not associated with any landscape designations, but the river Cherwell and Oxford Canal corridors are clearly of strategic importance, including as they are accessible to the residents of north Oxford, plus there is a need to consider the value of the raised wooded landscape to the west of Begbroke, and its close links to Blenheim Palace. There is also a need to note the Green Belt designation, which whilst not a landscape designation, potentially infers a degree of landscape importance, in the sense that the countryside contributes to rural setting of Oxford City. Land in the vicinity of the main employment cluster is of relatively low sensitivity; however, there is a need to caution against any risk of long term ‘sprawl’ across a relatively flat landscape with few ‘permanent’ boundaries. Given these points, and taking a precautionary approach, it is appropriate to highlight the merit of lower growth.
- **Transport** – as discussed above, under Air quality, there are significant transport infrastructure upgrades set to be delivered alongside the strategic housing growth directed to Kidlington and surrounding villages through the Cherwell Local Plan Partial Review. Further strategic employment growth could, and likely would, support additional transport upgrades including those for active travel; however, there are no known stand-out opportunities arising from the options.

6 Upper Heyford

6.1 Introduction

6.1.1 The aim here is to explore options for Upper Heyford.

6.2 Approach and methodology

6.2.1 The Options Paper presents one set of options for Upper Heyford, as follows:

- Option 1 (**lower growth**) – allocate further land for housing and employment at Heyford Park, beyond that which is already planned for within the current plan period (2011-2031)..
- Option 2 (**higher growth**) – limit further development beyond that which is already planned for within the current plan period (2011-2031).

6.2.2 An appraisal of these alternatives is presented below in an appraisal ‘matrix’. Within each of row of the matrix, the aim is to explore the merits of the alternatives in respect of one aspect of the SA framework (see Appendix I). Specifically, within each row, the aim is to both A) rank the alternatives in order of preference, with “=” used where it is not possible to meaningfully differentiate the alternatives, and “?” used to highlight uncertainty; and B) predict ‘likely significant effects’ on a five point scale.³²

6.3 Appraisal findings

6.3.1 Appraisal findings are presented in the appraisal matrix below.

Table 3.4: Appraisal of initial growth scenarios for Upper Heyford

Topic	Option 1: Lower growth	Option 2: Higher growth
	Rank of preference and categorisation of effects	
Air and wider environmental quality	?	?
Biodiversity	=	=
Climate change mitigation	★ 1	2
Climate change adaptation	=	=
Communities	?	?
Crime	=	=
Digital infrastructure	=	=
Education and skills	=	=
Employment	2	★ 1
Economic growth		
Flood risk	=	=
Health	=	=
Historic environment	★ 1	2
Homes	=	=

³² Red indicates a significant negative effect; amber a moderate or uncertain negative effect; no colour indicates neutral or uncertain effects; light green indicates a moderate or uncertain positive effect; and dark green indicates a significant positive.

Land and soils		2
Landscape		2
Poverty, disadvantage and social exclusion	=	=
Transport	?	?
Waste	=	=
Water	=	=

The appraisal finds Option 1 (lower growth strategy) to perform best in terms of more sustainability topics than is the case for Option 2 (four topics versus one); however, this does not necessarily serve to indicate that Option 1 is best performing overall (see discussion above, under Banbury).

Broadly speaking, Option 1 is preferable in respect of certain environmental topics, where Upper Heyford is relatively constrained, or faces particular growth-related issues. As for Option 2, this is supported in respect of 'economy and employment' objectives, because there is a growth opportunity, although significance is uncertain.

Having made these introductory remarks, the following bullet points cover key topics in turn:

- **Air quality** – this is a relatively rural area; hence air quality is of limited concern. There are, however, concerns around traffic – including HGVs and light goods vehicles – on rural roads, and passing through village centres which could have a detrimental localised impact on air and wider environmental quality.
- **Biodiversity** – part of the runway and surrounding open space is shown as priority habitat by the nationally available dataset (magic.gov.uk); however, there is no reason to suggest that this would come under development pressure under a higher growth scenario, including on the basis of the conservation area designation. There are also nearby sensitivities, most notably the River Cherwell and Oxford Canal corridor to the west (but also Ardley Cutting and Quarry SSSI, which is has both geological and biodiversity value); however, the potential for modest expansion (which would necessitate steps to ensure containment / avoid risk of long term 'sprawl') without encroachment on key biodiversity sensitivities can be envisaged.
- **Climate change mitigation** – despite its proximity to Bicester, this is a rural and relatively poorly connected part of the District. As such, there is a concern that additional growth here could conflict with climate change mitigation / decarbonisation objectives, particularly in terms of seeking to minimise per capita emissions from transport. This is potentially a significant concern, noting the stretching nature of the 2030 net zero target.
- **Communities** – any argument for further strategic housing growth would presumably be at least partly based on a desire to achieve a critical mass necessary to support additional community infrastructure, and more generally enable Upper Heyford to form a sense of community and function as a 'place'. However, it is difficult to pinpoint any opportunities, or threshold levels of additional growth that would lead to such benefits. There is also potentially a growth-related opportunity around supporting nearby rural communities; however, again the significance of any such opportunity is not clear at this current stage.
- **Employment and economic growth** – there is an employment growth opportunity at Upper Heyford, which is currently being explored in detail through the Cherwell Employment Needs Study. At the current time, ahead of the Study, it is assumed the opportunity is of limited significance in comparison to opportunities elsewhere at the main settlements and within strategic corridors.
- **Flood risk** – Upper Heyford is not affected by fluvial or surface water flood risk (to any significant extent), reflecting the topography and presumably also the limestone geology. There is a need to be mindful of downstream flood risk, but it is difficult to envisage particular issues, on the basis of available evidence.
- **Historic environment** – is a primary constraint to further growth at Upper Heyford, noting the wide-ranging sensitivities, as discussed within the Options Paper. Whilst there could be the potential for modest additional growth whilst avoiding areas of constraint, it is appropriate to flag a concern with a higher growth strategy which could harm the nationally and internationally significant heritage assets.
- **Homes** – the surrounding rural villages could feasibly be associated with a degree of housing need that could be met, at least to some extent, by housing growth at Upper Heyford. However, there is no evidence of this being the case, and it could be that the villages in question are suited to housing modest growth themselves, which would be a preferable approach to meeting any locally arising housing needs, alongside meeting wider objectives, for example around maintaining individual identities and sense of community.

- **Land and soils** – there are brownfield opportunities at Upper Heyford; however, these are limited, given the constraints that exist on much of the wider site, hence growth could lead to pressure on greenfield land. Based on the nationally available agricultural land quality dataset it seems that there is the potential for this land to be classified as 'best and most versatile land'.
- **Landscape** – without wishing to double count the heritage sensitivities discussed above, there are inherent landscape sensitivities that are a constraint to further growth at Upper Heyford, noting the raised location at the edge of the Cherwell Valley, along which also runs the Oxford Canal, and the generally rural landscape.
- **Transport** – is a key constraint to further growth at Upper Heyford. There is the potential for further growth to reach the mass necessary to improve the frequency of public transport services to reduce car dependency amongst residents, but it is anticipated that levels would remain high. There may be opportunities to explore improvements to cycling infrastructure to Bicester but the extent to which this is an attractive proposition and alternative to the car for residents is unknown.

7 Rural area

7.1 Introduction

7.1.1 The aim here is to explore options for the rural area.

7.2 Approach and methodology

7.2.1 The Options Paper presents six sets of options for Banbury; however, for the purposes of SA, it was considered appropriate to define and appraise a single set of mutually exclusive early, and high-level alternative options. The following alternatives were defined:

- Option 1 (**lower growth**) – would involve a continuation of the current strategy, which stems from the adopted Core Strategy (2015), with a new emphasis on ensuring that all villages / village clusters see some housing growth over the plan period in-line with housing needs (as far as these can be quantified).
- Option 2 (**higher growth**) – would involve a step-change in growth in the rural area, relative to the trend over recent years. The Local Plan could include allocations at those villages where there is considered to be a particular need (e.g. due to a lack of recent housing growth, or a need to support village services and facilities) or opportunity (e.g. due to a good level of services/facilities, or good connectivity to a higher order centre), or where there are sites that stand-out as performing strongly (including from a deliverability perspective).

7.2.2 An appraisal of these alternatives is presented below in an appraisal 'matrix'. Within each of row of the matrix, the aim is to explore the merits of the alternatives in respect of one aspect of the SA framework (see Appendix I). Specifically, within each row, the aim is to both A) rank the alternatives in order of preference, with "=" used where it is not possible to meaningfully differentiate the alternatives, and "?" used to highlight uncertainty; and B) predict 'likely significant effects' on a five point scale.³³

7.3 Appraisal findings

7.3.1 Appraisal findings are presented in the appraisal matrix below.

Table 3.5: Appraisal of initial growth scenarios for the rural area

Topic	Option 1: Lower growth	Option 2: Higher growth
	Rank of preference and categorisation of effects	
Air and wider environmental quality	★ 1	2
Biodiversity	?	?
Climate change mitigation	★ 1	2
Climate change adaptation	=	=
Communities	?	?
Crime	=	=
Digital infrastructure	=	=
Education and skills	=	=
Employment	=	=
Economic growth	=	=

³³ Red indicates a significant negative effect; amber a moderate or uncertain negative effect; no colour indicates neutral or uncertain effects; light green indicates a moderate or uncertain positive effect; and dark green indicates a significant positive.

Flood risk	=	=
Health	=	=
Historic environment	★ 1	2
Homes	2	★ 1
Land and soils	=	=
Landscape	=	=
Poverty, disadvantage and social exclusion	=	=
Transport	★ 1	2
Waste	=	=
Water	=	=

The appraisal finds Option 1 (lower growth strategy) to perform best in terms of more sustainability topics than is the case for Option 2 (four topics versus one); however, this does not necessarily serve to indicate that Option 1 is best performing overall (see discussion above, under Banbury).

Broadly speaking, Option 1 is preferable in respect of certain environmental topics, where the rural area is relatively constrained, or faces particular growth-related issues. Several of these issues are inter-related, namely air quality, climate change mitigation and transport. As for Option 2, this is supported in respect of 'housing' objectives, primarily because significant rural housing needs are thought likely to exist.

Having made these introductory remarks, the following bullet points cover key topics in turn:

- **Air quality** – whilst there are no designated AQMAs within the rural area, there is a need to consider growth leading to increased traffic through the Banbury, Bicester, Kidlington, Oxford and Chipping Norton AQMAs. Rural housing growth does come with a risk of entrenching car dependency, hence there is a need to flag an air quality concern; however, it is recognised that concerns will reduce over time given the imminent switch-over to electric vehicles (see Section 2.3). There is also a need to consider wider environmental quality (also road safety) concerns around increased traffic along narrow rural lanes, and within historic village centres.
- **Biodiversity** – there is little or no reason to suggest that the settlement edges of rural villages will tend to be particularly sensitive in biodiversity terms, although it is noted that many rural villages are clustered along river valleys (in contrast to the District's larger settlements, which have expanded beyond river valleys). A more significant consideration is potentially that a district-wide strategy involving a focus on dispersed, smaller scale housing schemes could be at the expense of a focus on strategic growth locations and, in turn, could potentially lead to a degree of opportunity missed in respect of growth supporting delivery of strategic biodiversity (and wider natural capital) enhancements.
- **Climate change mitigation** – a focus on dispersing growth to rural areas gives rise to certain concerns regarding per capita transport emissions, for the reasons discussed above. Also, dispersed rural growth could lead to opportunities missed in respect of delivering low carbon infrastructure and/or achieving standards of sustainable design and construction that go beyond the requirements of Building Regulations, thereby leading to opportunities missed in respect of minimising per capita emissions from the built environment. However, on the other hand, well targeted growth within the rural area can assist with maintaining rural services and facilities (e.g. primary schools), thereby minimising the need to travel to nearby villages or higher order settlements. On balance, it is appropriate to flag a concern with higher growth, but there are uncertainties.
- **Communities** – well-targeted housing growth can assist with maintaining and enhancing infrastructure in rural areas, including community infrastructure. The Options Paper explains: *"The 2015 Local Plan did not make specific allocations for development, these were intended to be included within a 'part 2' local plan. As such, most of the developments have come forward via the 'market' as speculative developments. This means that it has been more challenging to coordinate infrastructure improvements and supporting services."*

There are likely to be significant opportunities, although there is a need for further work, including with communities, to identify precisely where these exist. It is recognised that a key community-related objective within rural communities will often be around maintaining rural character and identity, and there can be a risk of housing growth conflicting with this objective. On balance, and assuming well located growth, there is support for exploring options that would see increased growth in the rural area relative to the existing strategy; however, there are uncertainties.

- **Employment and economic growth** – the Options Paper discusses the importance of development management policy to guide the development and diversification of agriculture and support sustainable rural tourism and leisure developments. However, it is difficult to suggest that there will be benefits to either a lower or higher growth strategy for the rural area. Housing schemes at villages can sometimes support modest new employment opportunities; however, this will not commonly be the case. It is also the case that house-building at smaller sites in rural areas can support SME housebuilders, but this is of somewhat limited significance.
- **Flood risk** – there is no to suggest potential issues or opportunities with either option as risk is highly dependent upon the specific locations.
- **Historic environment** – a high proportion of rural villages have a designated conservation area, and those without a conservation area tend to have a clear historic core with numerous listed buildings, plus there is a need to consider valued parish churches (and stately homes) in prominent locations. The degree to which villages have expanded beyond their historic core varies significantly across the District, but it is fair to highlight a risk of a higher growth strategy (Option 2) leading to growth in problematic or sensitive locations.
- **Homes** – the Options Paper explains that: *“Housing in the rural areas is perhaps one of the biggest challenges that the local plan will need to consider.”* Whilst it can be difficult to evidence with precision, there is likely to be significant rural housing needs, including a need for affordable housing and smaller homes for younger people, young families and older people wishing to downsize. It will be important that the district-wide portfolio of housing sites identified by the Local Plan Review includes a good proportion of smaller sites, with a view to ensuring that a five year housing land supply can be maintained over the plan period.
- **Land and soils** – housing growth at villages will often involve development of fields, or parts of fields, that are in productive agricultural use; however, this will equally be the case with growth directed to higher order settlements. There is no reason (at this early stage) to suggest that a higher growth strategy for the rural area would result in a greater proportion of growth being directed to higher quality agricultural land.
- **Landscape** – it is difficult to reach firm conclusions, without knowledge of how growth in the rural area would be distributed under a higher growth scenario, let alone specific sites for allocation. Village edge landscapes will tend to be valued by local residents, but there can be parts of the edge of a village that are less sensitive. New housing sites at villages will often be quite prominent from the main roads and/or public rights of way that pass through the area, but effects can be considered ‘localised’, when viewed at the district-scale. The approach to natural capital may go some way to assisting any future decisions about growth are made in an evidenced based way that considers a range of different metrics including landscape.
- **Transport** – without wishing to double count the issues/effects discussed above, under air quality and climate change mitigation, there are quite clear transport-related concerns associated with higher growth in rural areas. Housing growth can deliver important road infrastructure upgrades, for example new footpaths or cycle ways, but the overriding consideration is that higher growth in the rural area could be associated with a relatively high rate of car dependency district-wide, including as a dispersed strategy would not support good access to high frequency, rapid public transport. In turn, an increased rural population would likely lead to increased traffic and congestion on constrained parts of the highway network. This impact is likely to occur even with a switch towards electric vehicles.
- **Waste and water** – there can often be infrastructure constraints in the rural area, but it is difficult to draw strong conclusions at this early stage without knowledge of specific locations.

8 Conclusions and next steps

8.1 Conclusions

- 8.1.1 This Interim SA Report has explored thematic policy options and then early, high-level reasonable alternatives for each of the District's six places in turn.
- 8.1.2 In respect of the policy options, the appraisal finds that many are broadly supported in respect of sustainability objectives, although some tensions are highlighted. A range of suggestions are made, which can be considered subsequent to the current consultation, when drafting policies and developing the draft plan.
- 8.1.3 In respect of the high-level place-specific alternatives (higher growth versus lower growth), in each case the conclusion is that both options are associated with pros and cons against different sustainability objectives. It will be for the Council to 'weigh these in the balance', when considering the appropriate growth strategy, guided by the latest available evidence together with the latest policy context emerging through the Oxfordshire Plan and potentially the Ox Cam spatial framework.

8.2 Next steps

- 8.2.1 The next step will be to define and appraise reasonable alternative growth scenarios, defined as alternative "land supply" options, where each option involves a supply of land to meet objectively identified needs over the plan period. The growth scenarios will be housing-led, as this will be the key issue for the Local Plan (as it is for virtually all Local Plans), but there will also be a need to consider employment land supply, and potentially also strategy in respect of town centre uses, community facilities, green infrastructure and potentially other land uses besides.
- 8.2.2 Defining growth scenarios will involve a step-wise process, to include exploring broad distribution options (building on the initial, high-level appraisals presented in this report), individual site options (as far as possible, recognising these will be very numerous) and options for particular settlements / sub-areas (this is typically a key step). It is anticipated that work to define growth scenarios will be influenced by the Oxfordshire Plan 2050, and potentially also the Ox Cam Arc Spatial Framework. However, there is a need to be mindful that either the Oxfordshire Plan or the Arc Spatial Framework could be subject to delays, in which case the Local Plan Review would still need to be progressed.
- 8.2.3 Subsequent to the appraisal of reasonable growth scenarios, the Council will be in a position to prepare a draft ("Preferred Options") version of the Local Plan and publish it for consultation under Regulation 18 of the Local Planning Regulations. An Interim SA Report will be published alongside, essentially presenting an appraisal of "the plan and reasonable alternatives" (SEA Regulations 12(2)).
- 8.2.4 Following the Preferred Options consultation, there will be further work to explore growth scenarios (and reasonable alternatives in respect of any other specific policy areas / plan issues, for example key DM policy areas), prior to the Council finalising the Local Plan for publication under Regulation 19 of the Local Planning Regulations. The formally required SA Report will be published alongside, presenting the information required by the SEA Regulations. The Local Plan and SA Report will then be submitted for examination.