

Sustainability Appraisal (SA) of the Cherwell Local Plan Review

Interim SA Report

Non-technical Summary

September 2023



Introduction

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Cherwell Local Plan Review (LPR), which is being prepared by Cherwell District Council (CDC). Once adopted, the LPR will establish a strategy for growth and change up to 2040, allocate sites to deliver the strategy and policies used to determine planning applications.

SA is a mechanism for considering and communicating the effects of an emerging plan, and alternatives, with a view to minimising adverse effects and maximising the positives. Central to the SA process is preparation of an SA Report for publication alongside the draft plan, with a view to informing the consultation and subsequent plan finalisation.

At the current time an 'Interim' SA Report is published for consultation alongside an early draft version of the LPR ('the Draft LPR'). This is the Non-Technical Summary (NTS) of the Interim SA Report.

Structure of the Interim SA Report / this NTS

SA reporting essentially involves answering the following questions in turn:

- 1) What has the SA process involved **up to this point**?
- including in relation to 'reasonable alternatives'.
- 2) What are the SA findings **at this stage**?
- i.e. in relation to the draft plan.
- 3) What happens **next**?

Each of these questions is answered in turn below. Firstly though there is a need to set the scene further by considering the SA 'scope'.

What's the scope of the SA?

The scope of the SA is reflected in a list of topics, objectives and key issues/opportunities. Taken together, this list indicates the parameters of SA, providing a methodological 'framework' for assessment.

The topics at the core of the SA framework are as follows:

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

The SA process up to this point

A key element of the required SA process involves assessing 'reasonable alternatives' in time to inform the draft plan, and then publishing information on reasonable alternatives for consultation alongside the draft plan.

As such, Part 1 of the main report explains work undertaken to develop and appraise a 'reasonable' range of alternative approaches to the allocation of land for development, or '**growth scenarios**'.

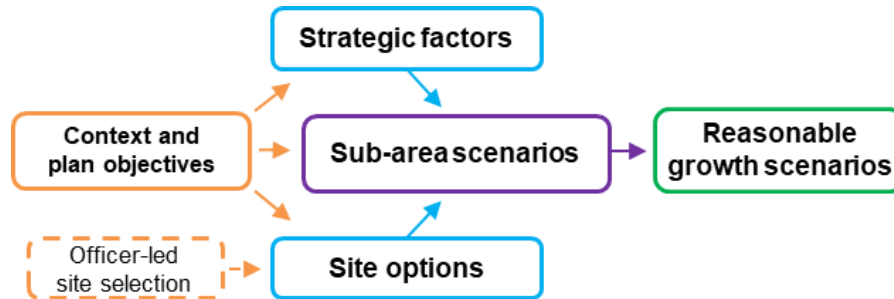
Specifically, Part 1 of the report presents–

- 1) work (by AECOM and CDC officers) to **define** the growth scenarios;
- 2) work (by AECOM) to **appraise** the growth scenarios; and
- 3) a statement (by CDC officers) that aims to **respond** to the appraisal.

Defining growth scenarios

Section 5 of the main report explains a process that led to the definition of growth scenarios. The figure below presents a summary.

Figure A: Defining growth scenarios



Section 5.2 of the report gives consideration to 'strategic factors', with sub-sections for: A) development quantum; and B) broad distribution.

- **Development quantum** – the Oxfordshire Housing and Economic Needs Assessment (HENA, 2022), commissioned by CDC and Oxford City Council, provides evidence in respect of Cherwell's Local Housing Need (LHN), concluding that LHN is 1,009 dwellings per annum (dpa).

The HENA also provides evidence to inform a conclusion on Oxford City's unmet housing needs, and the proportion that should be provided for through the Cherwell LPR.

On the basis of the HENA, there is a strong argument for setting the housing requirement at 1,009 dpa (LHN) + 284 dpa (unmet need) = **1,293 dpa**. However, there is also a need to be alive to the possibility of setting the housing requirement at a modestly lower or higher figure.

- **Broad distribution** – the main report presents a lengthy review under three sub-headings. A key consideration is the balance of growth between settlements, and also the appropriate mix of development site typologies, e.g. large strategic, strategic and smaller sites.

Conclusions (see page 23 of the main report) include:

- There is a strong argument for *broadly* rolling forward the existing strategy, particularly the strategy of directing a high proportion of growth **Bicester** and **Banbury**, and to Bicester in particular.
- There are strategic arguments in support of growth in the **Kidlington** area and at **Heyford Park**. However, there are a range of detailed factors to consider, e.g. Green Belt at Kidlington.
- There are limited strategic arguments in support of a **new settlement** (beyond Heyford Park). However, new settlement options do warrant a proportionate degree of detailed consideration.
- There are limited strategic arguments for dispersing growth to the **rural area**, although consideration might be given to a limited boost to the rate of growth, in so far as sustainability considerations allow.
- In light of the recent Cherwell experiences, and also mindful of the Oxfordshire context (e.g. seeking to align with growth with transport and decarbonisation objectives) there is support for **strategic growth locations**. However, there is a need to carefully consider place-making objectives (e.g. avoiding 'sprawl'), and there are also clear arguments for a mix of site allocations, to include smaller sites.
- There are myriad **other strategic factors** that must feed-in to work to establish reasonable growth scenarios, e.g. maximising urban supply, avoiding environmental constraints / realising environmental opportunities, climate change adaptation and Green Belt protection.
- Whilst a key focus is on broad distribution issues / options in respect of housing growth, there are also significant broad distribution factors in respect of **employment land** (Box 5.1 of the main report).

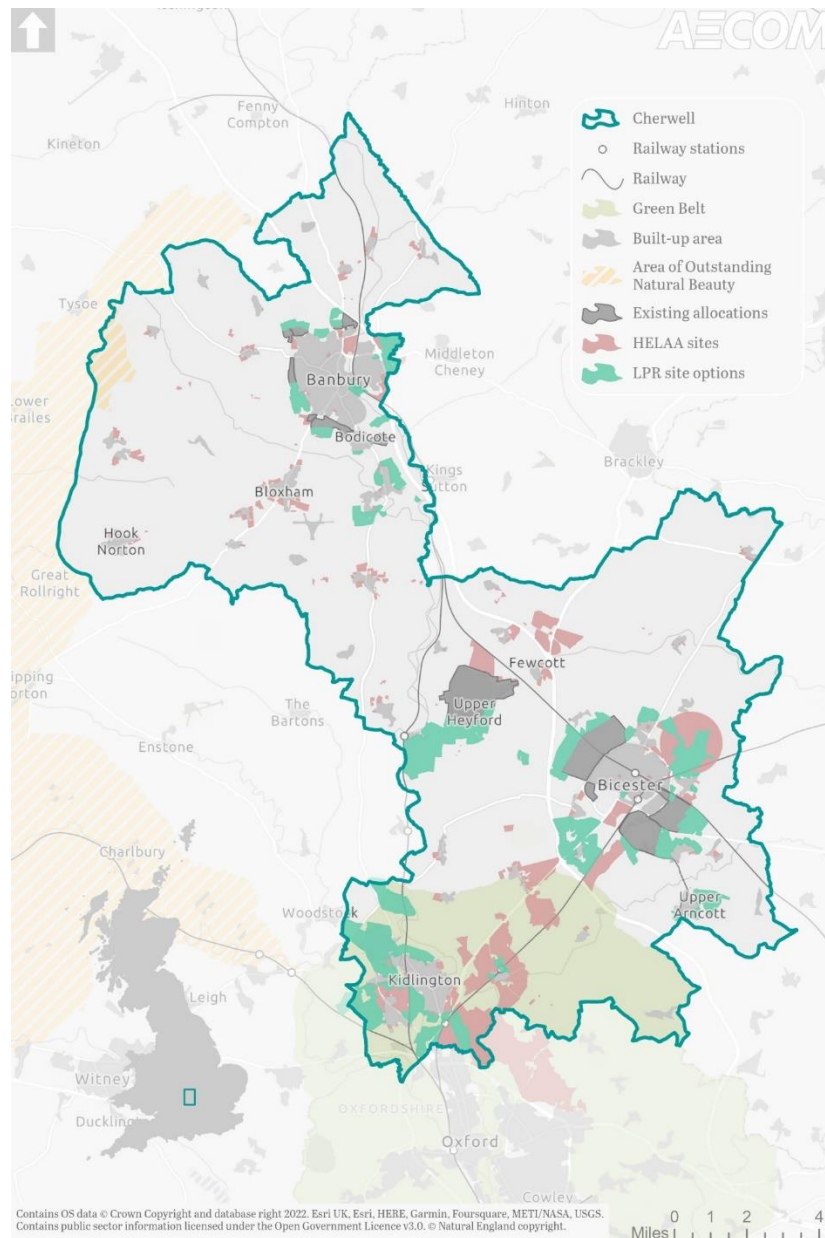
Section 5.3 of the main report then gives consideration to the site options that are feasibly in contention for allocation. The starting point was a list of **63 strategic site options** identified by CDC officers.

N.B. the current Draft LPR focuses on allocation of strategic sites, but potential **non-strategic allocations** will be considered at the next stage.

A key criterion for designation as a strategic site option was reasonable accessibility to a higher tier settlement.

The strategic site options (known as 'LPR sites') are shown in Figure B, below. Other site options are also shown for context (known as Housing and Employment Land Availability Assessment (HELAA) sites).

Figure B: The 63 strategic site options that fed into the process



Section 5.4 of the report then draws upon the preceding two stages of work to give consideration to growth scenarios for the District’s five **sub-areas**.

For each sub-area, detailed consideration to potential ways of allocating site options in combination in order to deliver a reasonable number of homes for the sub-area. The conclusion is a need to progress:

- one growth scenario for the Banbury sub-area, for the non-Green Belt part of the Kidlington sub-area and the rural sub-area;
- two growth scenarios for the Bicester sub-area and Heyford Park; and
- three growth scenarios for the Green Belt part of the Kidlington area.

Table A: Summary of the sub-area growth scenarios

Sub area	Growth scenario(s)
Banbury	One scenario: 830 homes
Bicester	Two scenarios: 1,300 or 2,300 homes
Kidlington area Green Belt (GB)	Three scenarios: 0, 300 or 2,000 homes
Kidlington area beyond the GB	One scenario: 450 homes
Heyford Park	Two scenarios: 0 or 1,235 homes
Rural area	One scenario: 500 homes
Total homes from allocations (i.e. over-and-above completions, commitments and windfall)	Between 3,080 (theoretical minimum) and 7,315 homes (theoretical maximum)

N.B. ‘**completions**’ are new homes that have been delivered since the start of the plan period (2020); ‘**commitments**’ are new homes with a planning permission or an existing allocation that can be taken forward into the LPR; and **windfall sites** are non-allocated sites that come forward in line with policy, typically in urban areas.

This was a key step in the overall process of defining at reasonable growth scenarios for the LPR / plan area as a whole. Point to note include:

- Constants versus variables – a decision was reached that the approach to growth at three broad areas (Banbury, Kidlington non-GB and the rural area) should be held constant across the reasonable growth scenarios. That is not to say that there is no choice here, in respect of the approach to growth, but only that there is less strategic choice than is the case for the other broad areas. There is a clear pragmatic need to minimise the number of variables / scenarios taken forward.
- Constant allocations – a total of 12 site allocations feature across the sub-area scenarios, of which eight are a constant and four are a variable (N.B. this is explained clearly in the maps presented below). Again, it should not be assumed that constant allocations are a ‘fait accompli’. Rather, the approach taken reflects a view that the four variable sites are those that, on balance (in light of site-specific and strategic factors), are particularly ‘marginal’. The analysis presented in Section 5.4. serves to highlight numerous other ‘near-miss’ sites (both allocations and omission sites) that are held constant *on balance*. In contrast, for other sites the decision is quite clear cut.
- Employment land – the sub-area scenarios presented in Table A and, in turn, the reasonable growth scenarios discussed below, vary in terms of housing-led sites only (i.e. employment sites are held constant). Again, this decision was reached on balance and should not be taken as a suggestion that there is no strategic choice to be explored.

The emerging preferred approach, which is held constant across all scenarios, involves five employment-led allocations. Having factored-in completions and commitments there remains a significant shortfall against the identified need figure set out in the HENA; however, it is not possible to pinpoint better performing options for boosting supply / addressing the shortfall at the current time. This will be a key matter for consideration subsequent to the current consultation.

Finally, with regards to defining growth scenarios, Section 5.5 how to combine the sub-area scenarios in order to form **reasonable growth scenarios** for Cherwell as a whole. There are 12 feasible combinations of the sub-area scenarios (three scenarios for Kidlington GB, combined with four scenarios (2 x 2) for Bicester and Upper Heyford); and none of the combinations are ‘unreasonable’, e.g. due to insufficient total supply, or because two sub-area scenarios in combination would lead to a problematic in combination impact, e.g. traffic along a constrained road corridor.

As such, a decision was reached that there are currently **12 reasonable growth scenarios**. These are presented below, within Table B, and across the subsequent series of maps. By way of further introduction:

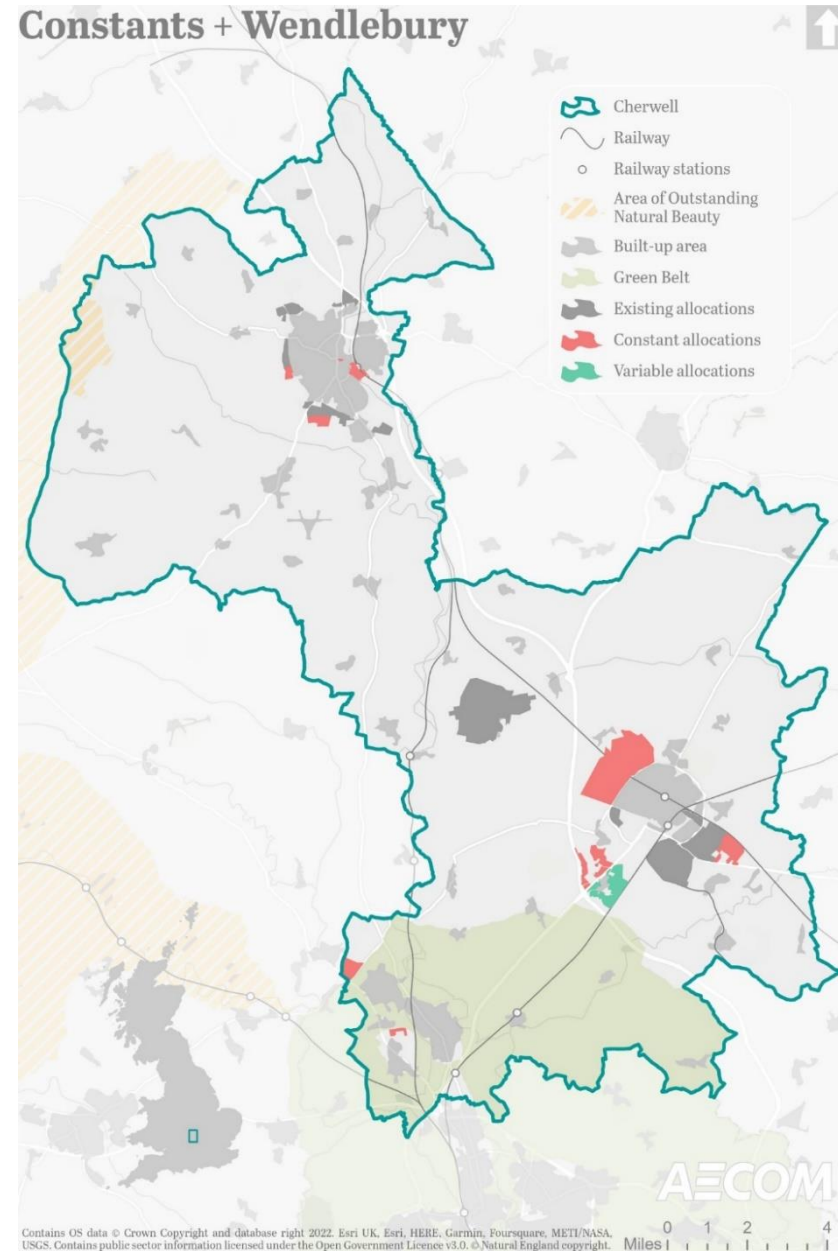
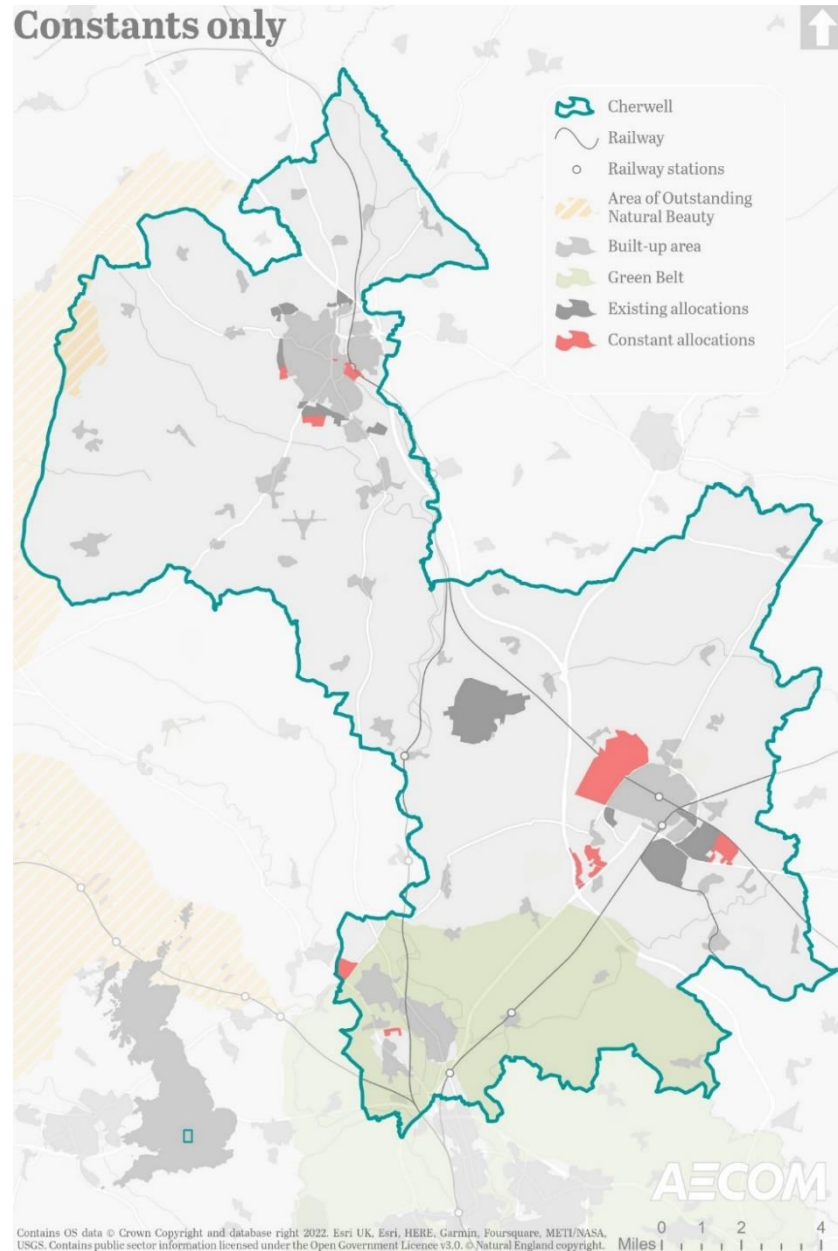
- Completions, commitments and windfall – see definitions above. It should be noted that the commitments figure is for new homes set to come forward within the plan period (2040). North West Bicester will also deliver significant homes beyond the plan period.
- Banbury – there are five allocations (two of which are adjacent), all of which are held constant across the scenarios. Two of these are for employment, one is mixed use (Canalside) and two are for housing. Both of the housing sites would extend committed strategic sites.
- Bicester – the very large ‘constant’ allocation is NW Bicester, which comprises the existing allocation from 2015 plus a northern extension. The current proposal is to deliver an additional 1,000 homes within the committed site boundary, and to deliver new strategic greenspace within the extension. The western-most constant site is proposed for employment, and it should be noted that there is a recently committed strategic employment site adjacent to the east (not shown on the maps below). The other constant allocations (on balance) are: SE Bicester Extension (adjacent housing and employment sites); and South of Chesterton. The variable site (assumed for 1,000 homes but being promoted for 2,800) would involve strategic growth at Wendlebury.
- Kidlington area – the constant allocation comprises land adjacent to the east of Woodstock, whilst the two variable allocations are North of the Moors, Kidlington and Shipton Quarry new settlement (2,000 homes assumed, but promoted for more).
- Heyford Park – there are clear arguments for exploring additional growth, and any further additional growth must be comprehensive rather than piecemeal. However, there is also a need to consider the option of no further growth, e.g. given transport connectivity.
- Rural area – held constant on balance (see discussion in Section 5.4).
- Total homes – total supply should exceed the housing requirement (a ‘supply buffer’) to account for unforeseen delivery issues, i.e. to ensure that the housing requirement is met in practice / the plan is ‘resilient’.

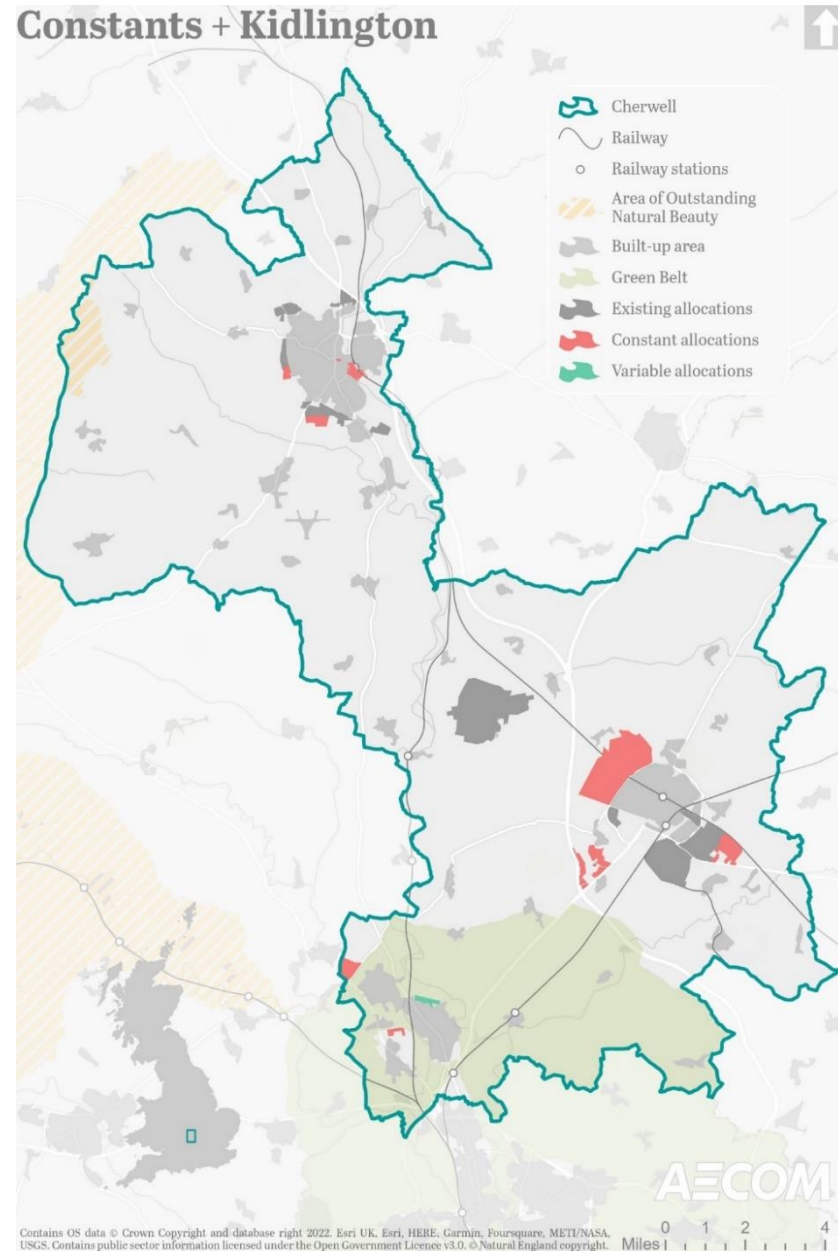
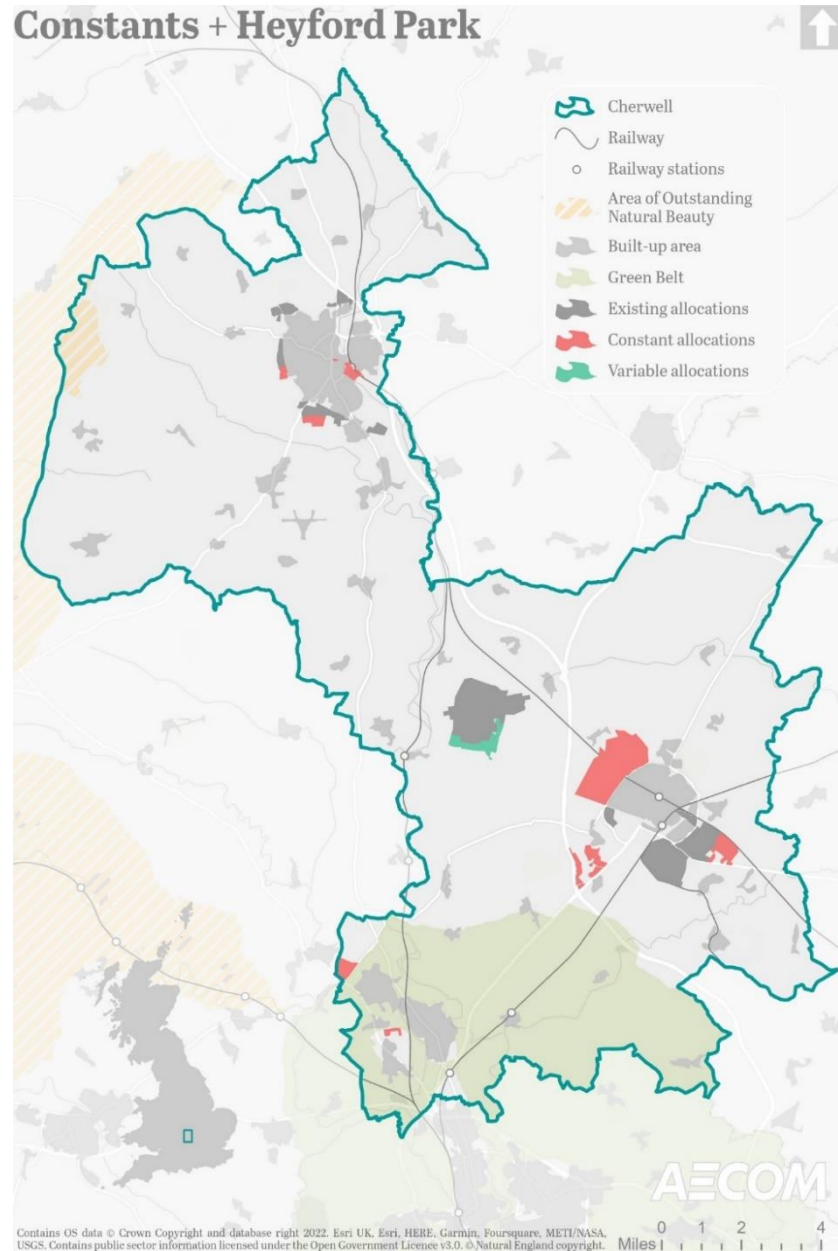
Table B: The reasonable growth scenarios (constants greyed-out; high growth highlighted with blue)

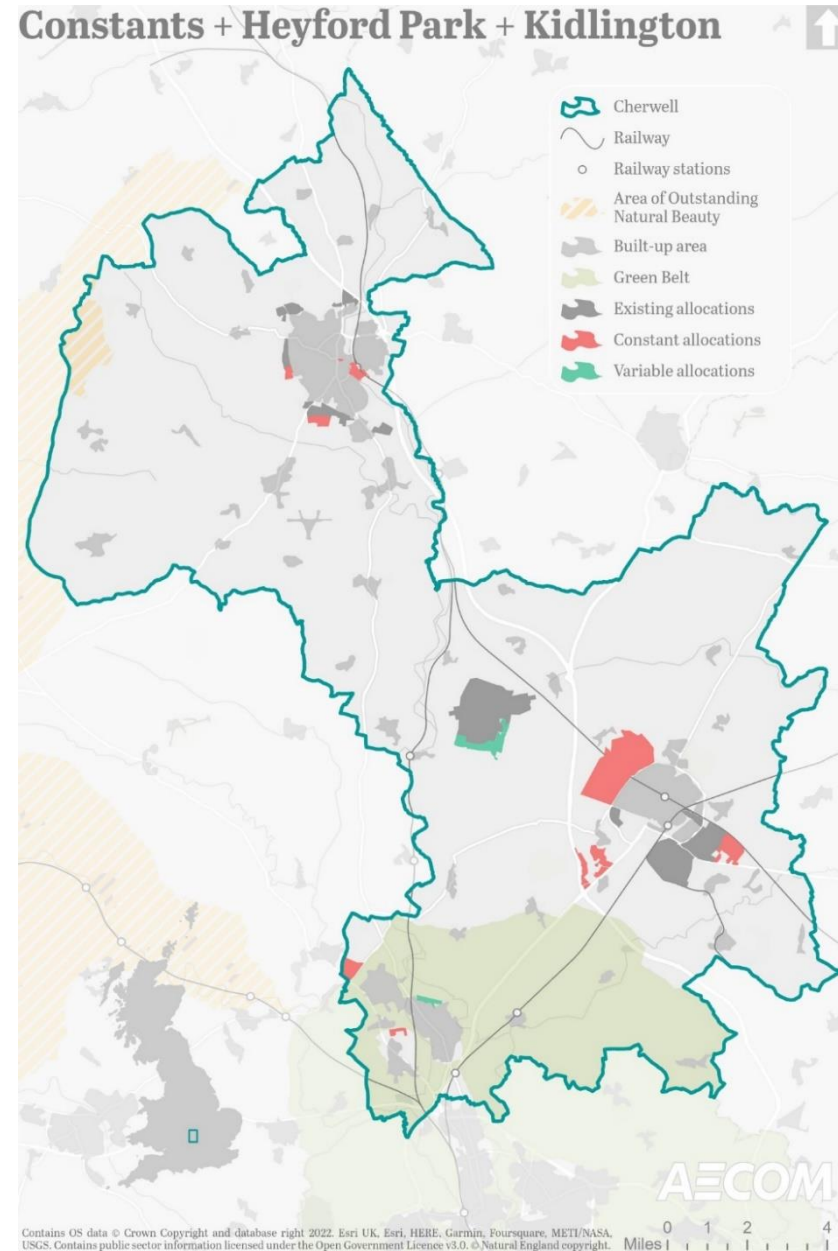
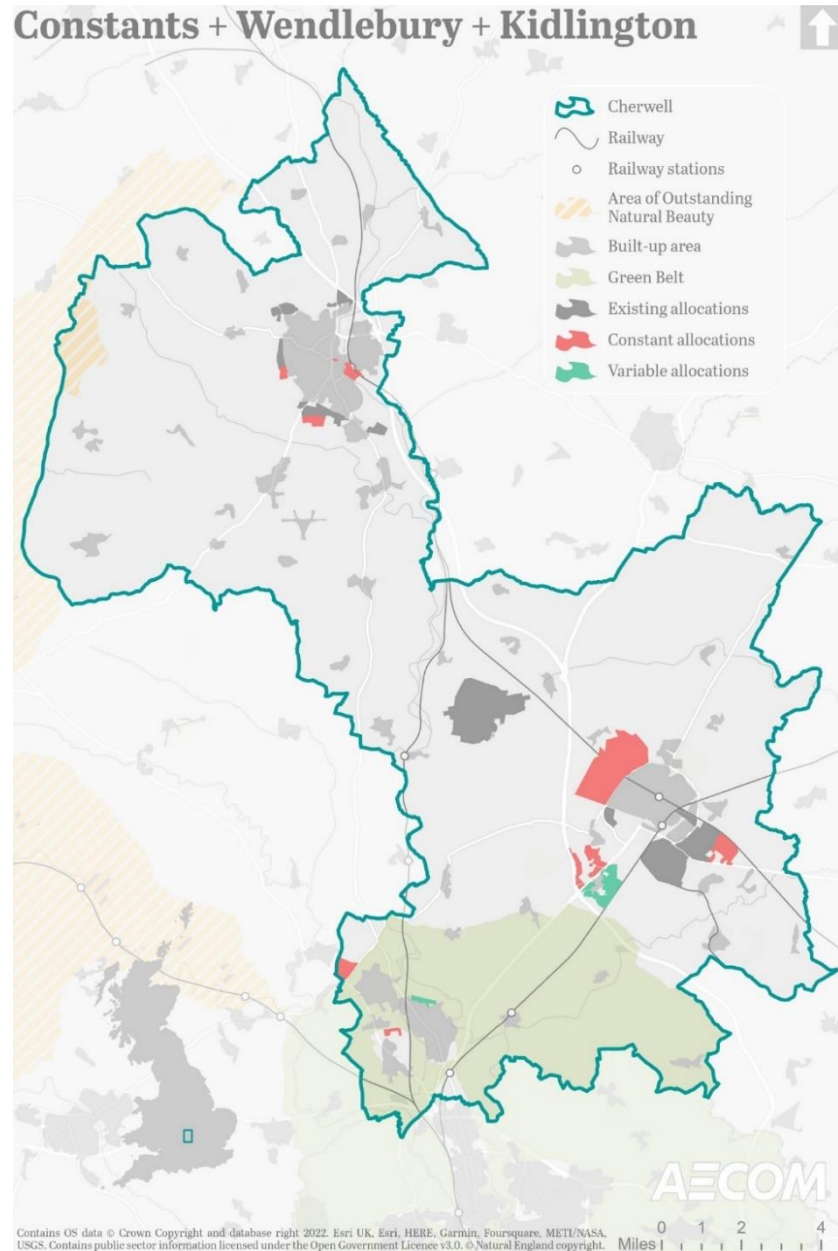
Scenario <i>Completions, commitments, windfall, constant allocations plus allocation of...</i>	1. N/a	2. W'bury	3. HP	4. W'bury HP	5. K'lington	6. W'bury K'lington	7. K'lington HP	8. W'bury K'lington HP	9. SQ	10. W'bury SQ	11. SQ HP	12. W'bury SQ HP
Completions / commitments	20,206	20,206	20,206	20,206	20,206	20,206	20,206	20,206	20,206	20,206	20,206	20,206
Windfall	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000	1,000
Banbury allocations	830	830	830	830	830	830	830	830	830	830	830	830
Bicester allocations	1,300	2,300	1,300	2,300	1,300	2,300	1,300	2,300	1,300	2,300	1,300	2,300
Kidlington GB allocation	0	0	0	0	300	300	300	300	<u>2,000</u>	<u>2,000</u>	<u>2,000</u>	<u>2,000</u>
Kidlington non-GB allocation	450	450	450	450	450	450	450	450	450	450	450	450
Heyford Park	0	0	1,235	1,235	0	0	1,235	1,235	0	0	1,235	1,235
Rural area	500	500	500	500	500	500	500	500	500	500	500	500
Total new homes	24,286	25,286	25,521	26,521	24,586	25,586	25,821	26,821	26,286	27,286	27,521	28,521
Per annum	1,214	1,264	1,276	1,326	1,229	1,279	1,291	1,341	1,314	1,364	1,376	1,426
% over 1,293 pa.	-6	-2	-1	3	-5	-1	0	4	2	6	6	10

Abbreviations: W'bury = Wendlebury; K'lington = Kidlington; HP = Heyford Park; SQ = Shipton Quarry

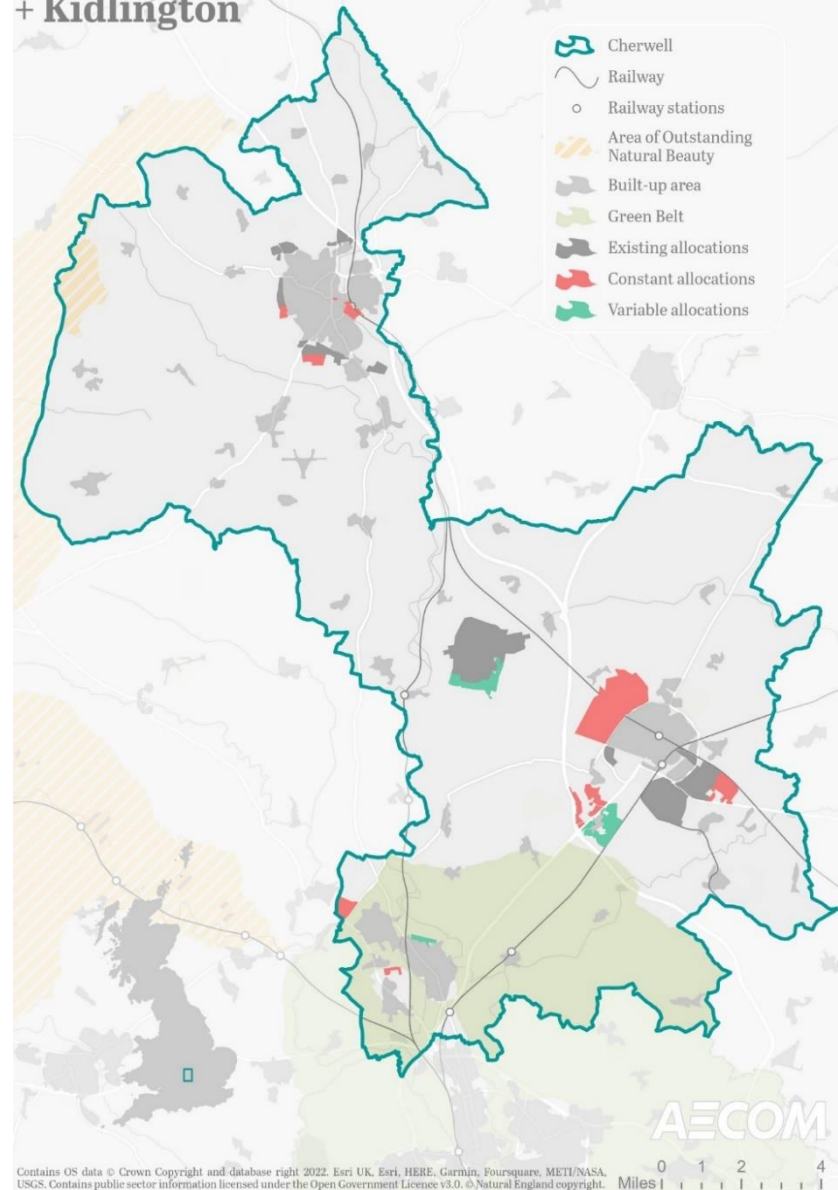
Note on RAG shading: As discussed, there is a clear case for setting the housing requirement at LHN, which is 1,293 homes pa. That being the case, scenarios involving total supply less than 1,293 pa. are flagged as **red**. Also, scenarios involving a potentially insufficient 'supply buffer' over 1,293 pa. are shaded **amber**. The highest growth scenario is shaded **dark green** because the housing requirement could be set at LHN and there would be a healthy supply buffer of 10%, thereby providing confidence in respect of the resilience of the plan to unforeseen delivery issues.



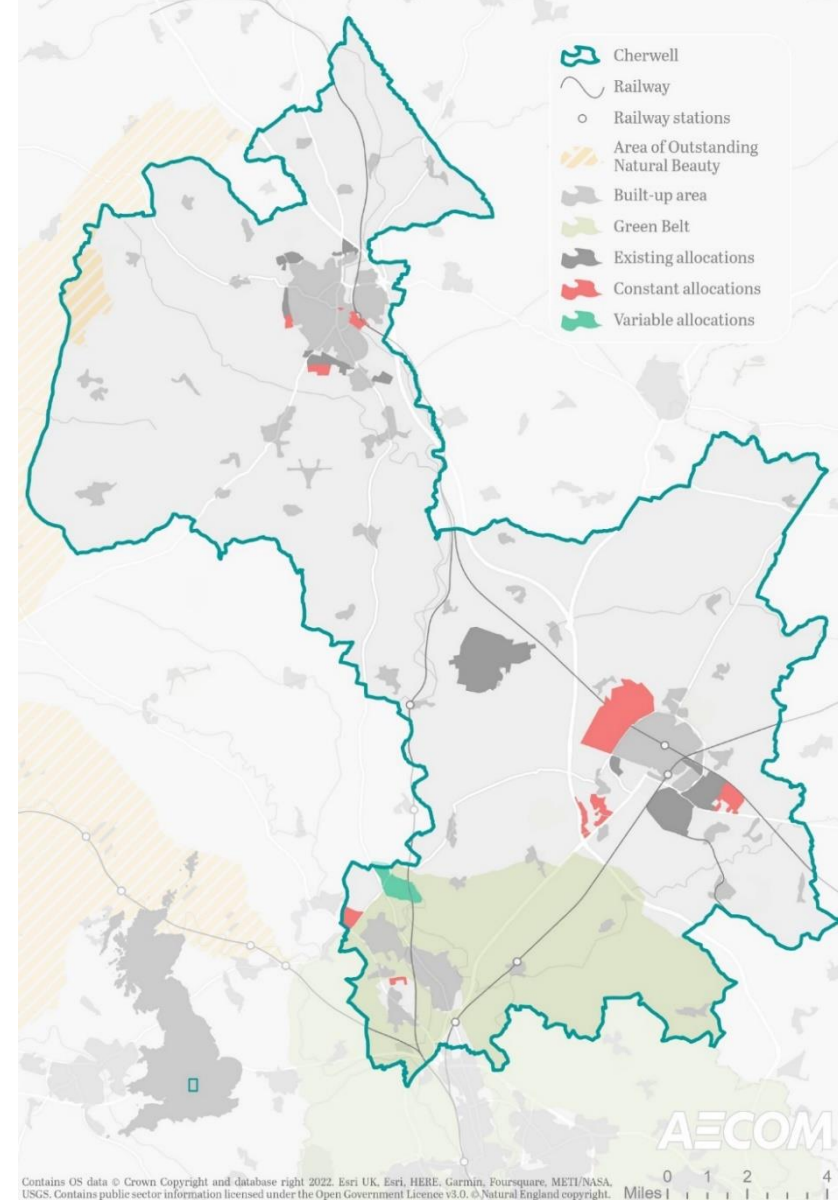




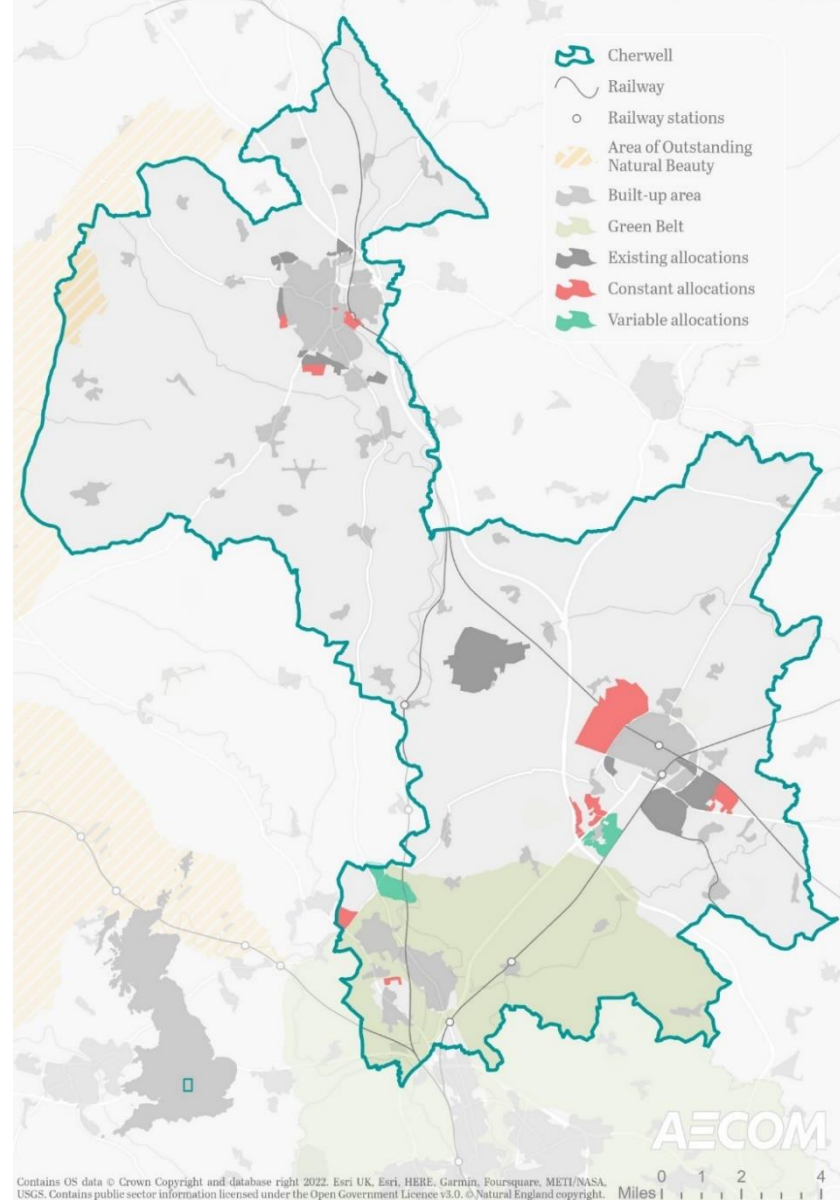
Constants + Wendlebury + Heyford Park + Kidlington



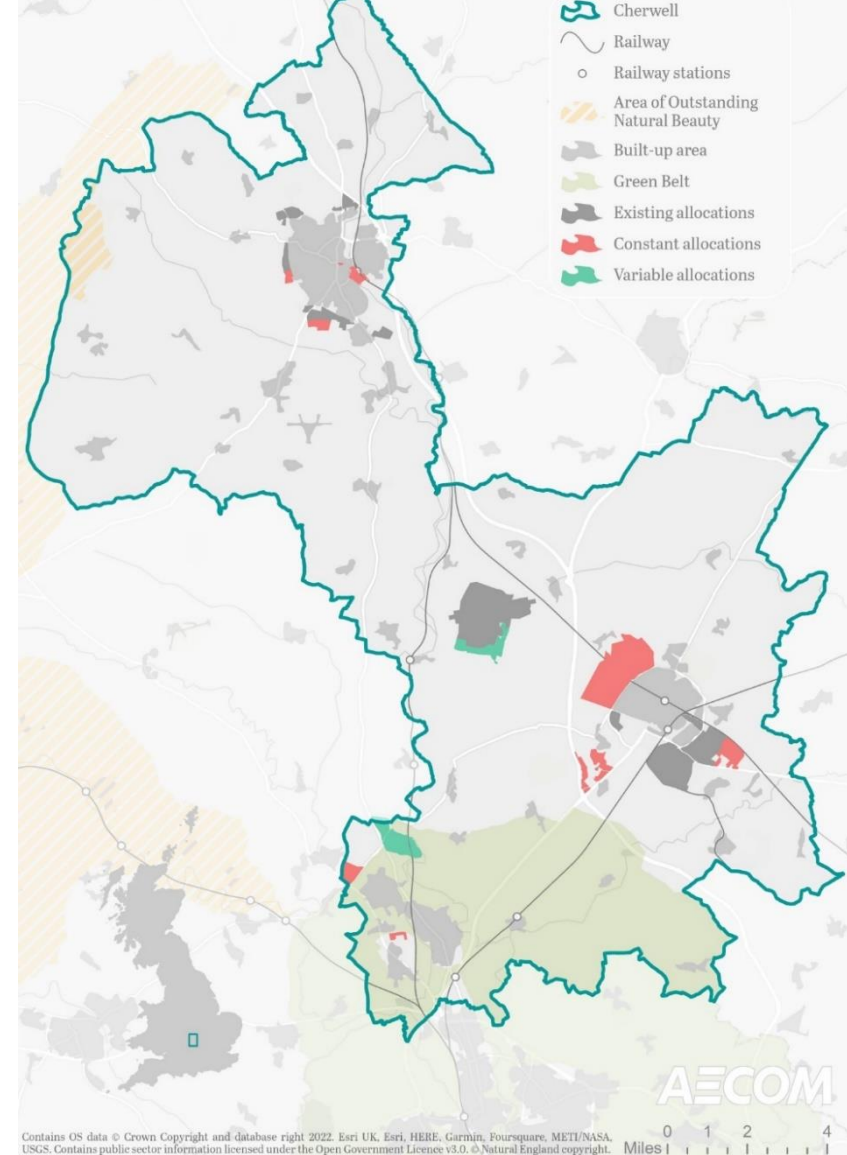
Constants + Shipton Quarry

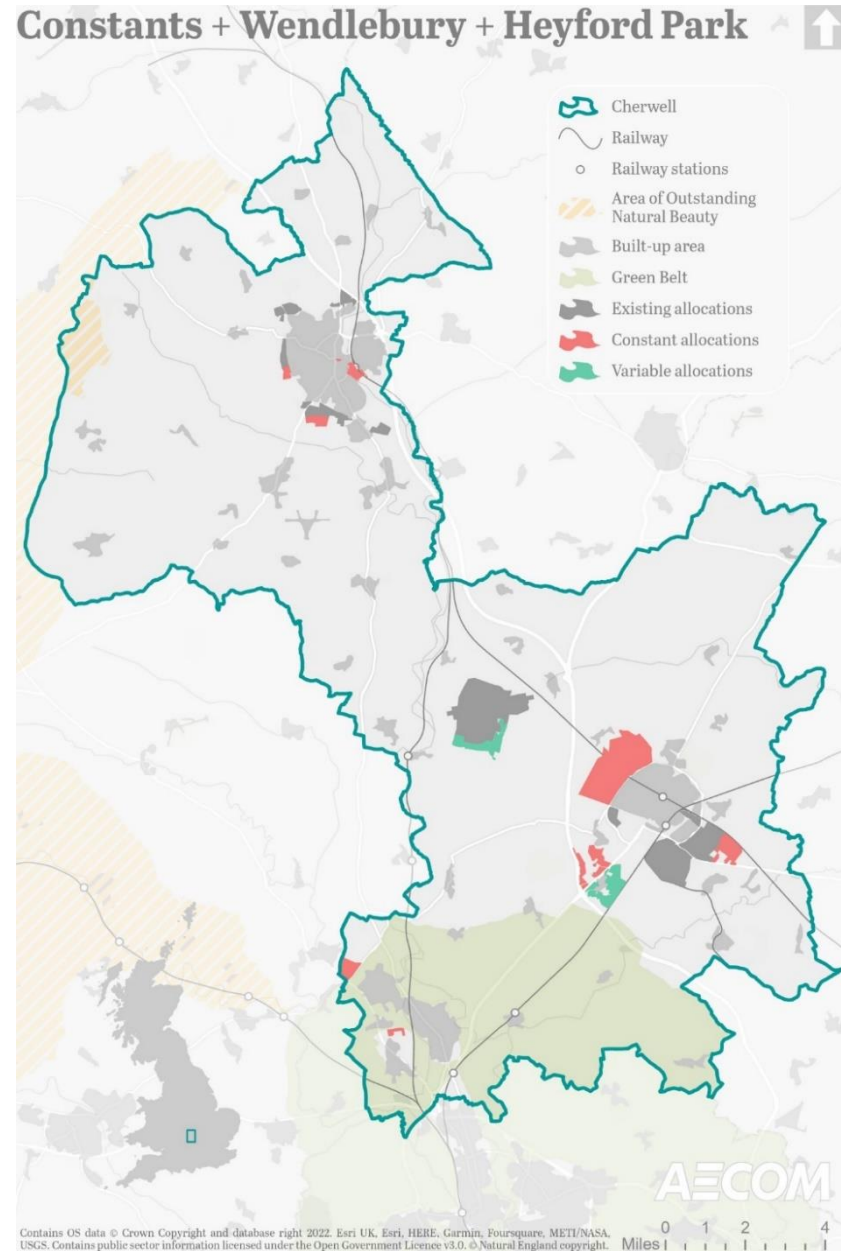
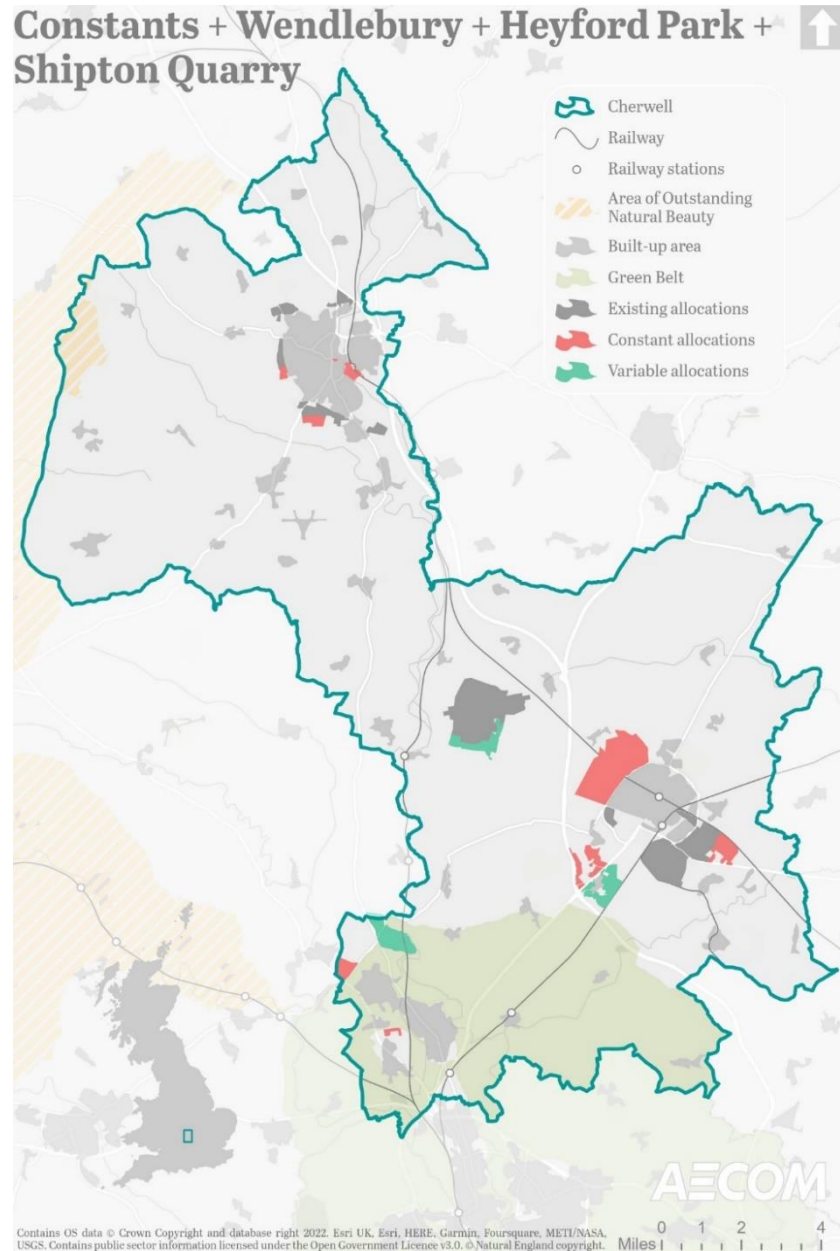


Constants + Wendlebury + Shipton Quarry



Constants + Heyford Park + Shipton Quarry





Appraising growth scenarios

Section 6 of the main report presents the appraisal of reasonable alternative growth scenarios in full and set out below is a summary. For ease, the scenarios are presented below in summary form.

Table C: *The reasonable growth scenarios – summary*

Scenario <i>Completions, commitments, windfall, constant allocations plus allocation of...</i>	Total homes	Homes per annum
-	24,286	1,214
Wendlebury,	25,286	1,264
Heyford Park	25,521	1,276
Wendlebury, Heyford Park	26,521	1,326
Kidlington	24,586	1,229
Wendlebury, Kidlington	25,586	1,279
Kidlington, Heyford Park	25,821	1,291
Wendlebury, Kidlington, Heyford Park	26,821	1,341
Shipton Quarry	26,286	1,314
Wendlebury, Shipton Quarry	27,286	1,364
Shipton Quarry, Heyford Park	27,521	1,376
Wendlebury, Shipton Quarry, Heyford Park	28,521	1,426

Table D presents summary appraisal findings. With regards to **methodology**, within each row (i.e. for each of the SA topics) the columns:

- rank the scenarios by performance, where '1' is best performing; and
- categorise the performance of each scenario in terms of 'significant effects', using red (significant negative), amber (moderate or uncertain negative), no colour (no significant effect), light green (moderate or uncertain positive) and dark green (significant positive).

When interpreting Table D, the following key points should be noted:

- An immediate point to note is the number of **red and amber scores** assigned. However, in a number of cases there is an expectation that concerns could be allayed through further work. For example, and in particular, there is the potential to identify additional housing and employment land supply subsequent to the current consultation.
- A second point to note is that **Scenario 1** (lowest growth) is shown to perform relatively poorly in wide ranging respects.

The reasons for this are quite clear in terms of socio-economic topics, but more nuanced in terms of environmental topics, reflecting a view that: A) Cherwell does not stand-out as a more constrained area in the sub-regional context (in certain respects); and B) lower growth in Cherwell would lead to pressure for higher growth elsewhere.

On the basis of the appraisal matrix there is strong reason to suggest that Scenario 1 performs poorly overall. However, there is a need to apply caution, before reaching any such conclusion. This is because the SA topics cannot be assumed to have equal importance, or 'weight' in the decision making process. If the Council, as decision-makers, were to assign particular weight to climate change adaptation, historic environment and water objectives, then Scenario 1 might be seen to perform well overall.

- With regards to the other eleven scenarios, the appraisal shows a **mixed picture**, with all scenarios associated with pros and cons.
- Focusing on **higher growth scenarios**, these perform well in terms of socio-economic objectives, but give rise to tensions in respect of certain environmental objectives. In particular, higher growth scenarios risk generating conflict with biodiversity, historic environment, landscape and water objectives, but this is dependent on the specific sites involved.
- Unsurprisingly, the appraisal does serve to highlight clear arguments for supporting one of the **middle growth scenarios**. For example, Scenarios 7 and 8 perform very similarly, with the only difference being that Scenario 8 performs better in terms of 'homes' (as a higher growth scenario) and worse in terms of 'climate change adaptation' (because the site that would deliver additional growth is subject to flood risk, namely Wendlebury).

Table D: The reasonable growth scenarios summary appraisal findings (N.B. number indicates rank of preference and shading indicates predicted effect)

Scenario	1. Constants	2. W'bury	3. HP	4. W'bury HP	5. K'lington	6. W'bury K'lington	7. K'lington HP	8. W'bury K'lington HP	9. SQ	10. W'bury SQ	11. SQ HP	12. W'bury SQ HP
Topic												
Air quality	2	1★	1★	1★	1★	1★	1★	1★	1★	1★	1★	1★
Biodiversity	2	1★	1★	1★	1★	1★	1★	1★	3	3	3	3
Climate change adaptation	1★	2	1★	2	1★	2	1★	2	1★	2	1★	2
Climate change mitigation	2	1★	1★	1★	2	1★	1★	1★	1★	1★	1★	1★
Communities	2	1★	1★	1★	1★	1★	1★	1★	1★	1★	1★	1★
Economy	3	2	2	1★	3	1★	1★	1★	1★	1★	1★	1★
Historic environment	1★	2	2	2	2	2	2	2	2	2	2	2
Homes	12	10	9	5	11	8	7	4	6	3	2	1★
Land	2	2	2	2	2	1★	2	2	1★	1★	2	1★
Landscape	2	1★	1★	2	2	2	2	2	2	2	2	2
Transport	5	3	4	2	3	2	2	2	2	1★	2	2
Water	1★	1★	1★	1★	1★	1★	1★	1★	1★	1★	2	2

The following bullet points aim to briefly summarise performance of the growth scenarios under each of the topic headings in turn:

- **Air quality** – on the one hand, there are a range of site-specific issues (see discussion below under ‘transport’). However, on the other hand, development at all of the sites in question, namely the four sites that are a ‘variable’ across the growth scenarios, could potentially serve to support the achievement of strategic transport objectives. On balance, it is considered appropriate to only flag a concern with the lowest growth scenario, which would risk pressure for growth at locations elsewhere within a constrained sub-region, potentially at locations where growth would not align well with transport objectives.
- **Biodiversity** – it is fair to flag a concern with Shipton Quarry (at this relatively early stage, ahead of further detailed work and consultation). The site is closely associated with the River Cherwell corridor (a key strategic asset), which serves to indicate a degree of sensitivity, albeit also potentially an opportunity. There is also a concern regarding Wendlebury, on account of the close association of land here with the Upper Ray Meadows broad priority landscape, which is of sub-regional and potentially wider importance. However, concerns are somewhat limited on the assumption of a fairly modest scheme of ~1,000 homes.
- **Climate change adaptation** – there is a clear need to flag a concern with the option of growth at Wendlebury, albeit through further detailed work it may be possible to identify the potential for strategic growth in this area that does not give rise to a concern, from a flood risk perspective. Also, there may be the potential to address flood risk affecting the existing village of Wendlebury, leading to a betterment / planning gain. There are also question-marks regarding flood risk at Shipton Quarry, which would require further investigation. A further consideration is the possibility of growth at both Heyford Park and Shipton Quarry (Scenarios 11 and 12) enabling or facilitating investment in strategic flood water attenuation / natural flood risk management along the River Cherwell corridor (along with wider enhancements), to the benefit of locations downstream at risk.

N.B. the ‘amber’ score across all scenarios reflects a concern with one of the constant allocations (discussed under the draft plan appraisal).

- **Climate change mitigation** – the key consideration here is support for directing growth to large strategic sites, which tend to be associated with a built environment decarbonisation opportunity over-and-above smaller sites. However, there is a need for further work to confirm site specific opportunities at all three of the larger strategic sites in question, namely Shipton Quarry (which does have the benefit of being a larger site, and with some potential for a nucleated built form and a good mix of uses onsite), Heyford Park and Wendlebury. Another important consideration is directing growth to locations that benefit from strong development viability.

With regards to growth quantum, there is no potential to suggest that higher growth is inherently problematic, despite the fact that higher growth would make meeting the local net zero ambition (net zero by 2030) more challenging. This is because climate change is a global issue, such that there is a need to focus on per capita emissions.

With regards to significant effects, the conclusion reflects the fact that there are stringent targets and commitments in place, which will prove very challenging to achieve / honour unless urgent action is taken, with decarbonisation featuring as perhaps *the* central pillar of the LPR.

- **Communities** – all the variable site options in question are associated with a degree of merit, from a communities perspective, subject to further discussions with the County Council etc. All sites would give rise to certain tensions with existing communities (perhaps least so Kidlington, as a smaller site), and it is not clear that any would deliver specific strategic community infrastructure to the benefit of existing communities (e.g. a secondary school); however, it is possible to pinpoint some significant potential for growth to benefit existing communities and so deliver ‘planning gain’. In this light, it is difficult to differentiate between the scenarios, beyond highlighting a concern with low growth, which could lead to pressure for more piecemeal growth.
- **Economy** – as discussed above, under all scenarios there is currently a significant employment land undersupply as measured against the objectively assessed need figure established through the HENA (2022). However, there will be the potential to address this subsequent to the current consultation / prior to finalising the plan. There is a need to provide for employment land needs both in order to support the

realisation of strategic economic growth and productivity objectives and also with a view to collocating jobs and homes in order to avoid problematic commuting patterns. Delivering limited new employment land at Heyford Park, Shipton Quarry and/or Wendlebury is supported, whilst housing growth at Kidlington is supported given links to Oxford.

- **Historic environment** – it is considered appropriate to conclude support for the lowest growth scenario (Scenario 1). This reflects the fact that national designations constrain all of four of the variable sites (albeit three are also potentially associated with heritage opportunities).
- **Homes** – it is appropriate to rank the alternatives in order of total growth quantum. As things currently stand it is only under the highest growth scenarios where there is confidence in the ability to set the housing requirement at 1,923 dpa, which is the emerging preferred housing requirement, accounting for locally arising need and a proportion of unmet need from Oxford City. However, as discussed, there will be potential to boost supply subsequent to the current consultation, including through further consideration of urban capacity.
- **Land** – it is fair to highlight Heyford Park as likely subject to a degree of constraint, in terms of best and most versatile (BMV) agricultural land. With regards to growth quantum, it is not possible to suggest that lower growth is preferable, as Cherwell does not stand-out as a more constrained local authority area in the sub-regional context.
- **Landscape** – the appraisal is finely balanced, but overall there is judged to be support for Wendlebury and Heyford Park over Kidlington and Shipton Quarry. With regards to growth quantum, it is not clear that there are any in-combination concerns, and it could feasibly be the case that directing growth to both Heyford Park and Shipton Quarry supports targeted investment in enhancements along the River Cherwell / Oxford Canal corridor, as discussed. It would not be appropriate to conclude an inherent concern with higher growth, mindful of constraints affecting the other Oxfordshire authorities (including AONB and the setting of Oxford).
- **Transport** – there is a concern with Scenario 1, as the effect could be problematic in-commuting and/or pressure for growth elsewhere in Oxfordshire, at locations that perform less well in transport terms. It is also appropriate to flag Heyford Park as performing poorly in transport

terms, relative to the other three variable sites (albeit there are certain transport-related arguments in favour of further growth). With regards to significant effects, it is appropriate to predict differential significant effects, ranging from significant negative effects to moderate or uncertain positive effects, given the strategic importance of the issues. There is a clear need for proactive strategic planning across Oxfordshire in support of the achievement of transport objectives.

- **Water** – on the basis of the limited available evidence it is possible only to flag a degree of concern with the higher growth scenarios (also mindful that these two scenarios would see growth at Heyford Park, which could feasibly be associated with challenges from a wastewater management perspective).

The preferred growth scenario (text provided by CDC)

The preferred growth scenario is **Growth Scenario 7**.

Under Growth Scenario 7 the identified housing supply (1,291 dpa) is slightly below the proposed housing requirement of 1,293 dpa (which reflects 1,009 locally arising need and 284 dpa unmet need from Oxford City). However, there will be the potential to boost supply subsequent to the current consultation.

The appraisal shows Scenario 7 to perform well in a number of respects, with a ranking of “1” under seven topic headings, and positive effects on the baseline predicted under three headings.

However, the appraisal also serves to highlight a number of tensions with sustainability objectives, and drawbacks relative to the alternative scenarios. Issues and challenges highlighted by the appraisal can be addressed through further work on site selection and through DM policy.

With regards to the two ‘variable’ site options supported under Scenario 7:

- **Heyford Park** – it is recognised that this is a challenging location for growth from a transport perspective, but the strategy is specifically designed to deliver new transport infrastructure / service upgrades and precludes additional development coming forward before 2030 or without clear mechanisms in place to ensure the necessary infrastructure is forthcoming. The approach will also support improved containment / trip-internalisation in the longer-term. It is acknowledged

that this part of the district is relatively constrained in terms of comprising better quality agricultural land; however, it might well be the case (following further investigations), that the land is only grade 3a quality, i.e. the lowest grade of land classed as ‘best and most versatile’. There is also a need for further work in respect of wastewater infrastructure, plus there is a clear need for further close working with Historic England regarding the historic environment / heritage constraint (in respect of the former airfield and more widely).

- Kidlington (North of the Moors) – is within the Oxford Green Belt, but contributes to Green Belt purposes only to a limited extent, and the appraisal is supportive of growth here in terms of a range of sustainability objectives, such that a case can be built for the ‘exceptional circumstances’ necessary to justify Green Belt through a local plan. Heritage is a key constraint, but work completed to date has served to indicate good potential to avoid and suitably mitigate significant adverse effects. There is also a need for more work to confirm access arrangements, and in respect of transport connectivity. Finally, it is recognised that, as a smaller site, there may be a lower built environment decarbonisation opportunity in comparison to large-scale strategic growth locations; however, there is a clear need for a mixed portfolio of development sites, as part of the overall LPR supply. Also, the site is considered likely to perform quite well in terms of minimising transport-related greenhouse gas emissions.

With regards to the two variable site options that do not feature in Scenario 7, the merits of these options are recognised, e.g. the potential to deliver a new train station at Shipton Quarry, and the potential for growth at Wendlebury to align with strategic transport objectives for Bicester.

However, each of these sites is also associated with issues and drawbacks, and it is noted that the appraisal flags concerns with the specific schemes that have been proposed by the site promoters to date.

Scenarios involving allocation of one or both of these sites are considered to perform relatively poorly, on balance, but this matter could be revisited prior to plan finalisation, taking account of consultation responses received. Stakeholders are strongly encouraged to comment on the merits of the reasonable alternative growth scenarios through the current consultation.

Appraisal of the Draft LPR

Part 2 of the Interim SA Report presents an appraisal of the current early draft version of the LPR as a whole. The appraisal takes the form of 12 narrative discussions – one for each of the topic headings that together comprise the SA framework.

In practice, the appraisal builds upon the appraisal of Growth Scenario 7 presented above, with additional consideration given to: A) site allocations that are a ‘constant’ across the reasonable growth scenarios; and B) draft policies (both borough-wide and site-specific).

The overall appraisal conclusions are presented below.

Conclusion on the Draft LPR as a whole

The first point to note is that the appraisal predicts “moderate or uncertain negative effects” under six of the twelve sustainability topic headings. However, there will be the potential to address the identified concerns subsequent to the current consultation / prior to plan finalisation.

In particular, in respect of ‘**Housing**’ and ‘**Economy**’ objectives, subsequent to the Council having undertaken further work aimed at boosting supply it should be possible to predict positive effects, and potentially significant positive effects, at the next stage. Focusing on housing, the proposed ‘requirement’ is supported (1,293 dpa), but the identified supply currently falls slightly short of the requirement.

Equally, after having undertaken further work, including accounting for the consultation response received from the Environment Agency and the water company, it should be possible to reach a more positive conclusion in respect of the plan’s performance under both the ‘**Climate change adaptation**’ and ‘**Water**’ headings.

The final two predicted negative effects are then: ‘**Historic environment**’, in terms of which it may be that negative effects of some significance are unavoidable, but there will nonetheless be the potential to improve the plan’s performance / reduce tensions, including in light of advice provided by Historic England; and ‘**Land**’, in terms of which negative effects are likely to be unavoidable, given the extent of good quality agricultural land locally.

The second point to note is then the predicted “moderate or uncertain positive effect” under the ‘**Transport**’ topic heading. Assuming that housing and employment land supply can be boosted subsequent to the current consultation, then there is overall quite strong support for the proposed spatial strategy / package of proposed allocations. A proactive approach to meeting objectively assessed needs is strongly supported, given Cherwell’s location within a sub-region where the need for growth to align with strategic transport objectives is of key importance and, as part of this, there is a need to avoid speculative development (i.e. at sites not allocated within a local plan). Achievement of transport objectives, including opportunities to secure new and upgraded strategic transport infrastructure, is a clear focus of proposed thematic core / development management policies, including within the sub-area sections. However, certain of the proposed allocations give rise to a degree of tension with transport objectives.

Neutral effects are then predicted under the remaining five topic headings:

- ‘**Air quality**’ – one key issue relates to the question of whether growth at Bicester will help to deliver a southern link road.
- ‘**Biodiversity**’ – the proposed allocation at SE Bicester is notably adjacent to a large adjacent local wildlife site, but there could still be the potential to realise a suitable level of biodiversity net gain, potentially in excess of the nationally required 10%.
- ‘**Climate change mitigation**’ – whilst the proposed policy approach is considered suitably ambitious, there is a need to account for the latest national context / precedents, and there is also a need to further scrutinise the spatial strategy / package of proposed allocations from a perspective of fully realising decarbonisation opportunities.
- ‘**Communities**’ – there is a need for further work around access to community infrastructure, and one key issue is resolving the matter of access to a primary school from the east of Woodstock allocation.
- ‘**Landscape**’ – a number of the sites are associated with landscape sensitivity, and the proposed release of Green Belt is also noted (although Green Belt is not a landscape designation), however, the lower growth strategy for Banbury is supported, as is the overall proactive approach to meeting development needs (subject to further work to boost supply), given that Cherwell is located within a constrained sub-region.

Cumulative effects

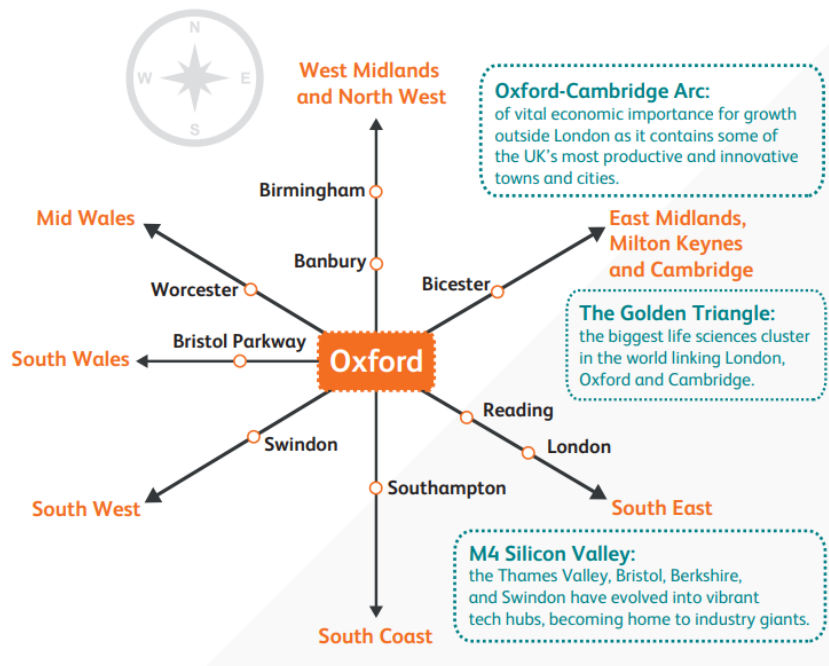
The SEA Regulations, which underpin the SA process, indicate that stand-alone consideration should be given to ‘cumulative effects’, i.e. effects of the LPR in combination with other plans, programmes and projects. In practice, this is an opportunity to discuss long term and ‘larger than local’ effects:

- **Housing needs** – this is a primary larger than local consideration, with all local plans needing to consider known, likely or potential unmet needs from neighbouring areas. The proposed housing requirement reflects a proactive approach to providing for Oxford’s unmet needs.
- **The economy** – there is a need to ensure that employment land is provided in line with regional and national objectives. In this light, the LPR focus on supporting strategic employment growth at Bicester is supported, as well as employment (and housing) growth at Kidlington, as both settlements fall within with Oxfordshire Knowledge Spine and the Ox Cam Arc. There is pressure for further warehousing floorspace at Banbury, but this is resisted on balance, noting that such uses are relatively footloose. A further consideration is the sub-regional value of Oxford City Airport (e.g. supporting Silverstone).
- **Transport corridors** – many of the key strategic opportunities around growth facilitating new or upgraded strategic transport infrastructure are ‘local’, rather than cross-boundary, e.g. aspirations for the A41 corridor at Bicester, and improved sustainable transport connectivity at Upper Heyford. However, there are also a range of cross-border considerations, e.g. bus services linking growth locations to Oxford, and A44 corridor considerations in respect of growth at Woodstock.
- **Oxford Meadows SAC** – the possibility of in-combination impacts is a focus of a stand-alone Habitats Regulations Assessment (HRA), the conclusion reached that there are no significant concerns.
- **Landscape scale nature recovery** – this is a key larger than local consideration, with a particular need to focus attention on: A) the River Cherwell / Oxford Canal corridor; and B) the Upper Ray Meadows (which link to the Bernwood Forest). Both broad landscapes are of Ox-Cam wide, and hence arguably national, significance. Strategic growth associated with, or nearby to, these broad landscapes could lead to funds being directed towards the realisation of strategic ambitions. A

Local Nature Recovery Strategy (LNRS) is forthcoming, under the Environment Act 2021, but steps must be taken in the interim.

- **Green Belt** – there is a need to maintain the integrity of the Oxford Green Belt. In this respect, the key point to note is that the proposed Green Belt allocation makes only ‘moderate’ contribution to purposes.
- **Decarbonisation** – ‘Bicester Eco-town’ has been discussed nationally for at least a decade. In turn, there is a strong argument for a national exemplar strategy. One matter for consideration could be the possibility of seeking to deliver a sub-regional modern methods of construction (MMC) facility.
- **Agricultural land** – self-sufficiency of food projection is increasingly a key national consideration.
- **Water** – a ‘Phase 1’ Oxfordshire [study](#) was completed in 2021.

Figure C: Oxford in the sub-regional context (Oxfordshire ORCS, 2021)



Next steps

Publication of the Local Plan Review

Subsequent to the current consultation it is the intention to prepare the proposed submission (or ‘publication’) version of the LPR for publication in-line with Regulation 19 of the Local Planning Regulations 2012. This will be a version that the Council believes is ‘sound’ and intends to submit for Examination. Preparation of the ‘Publication’ LPR will be informed by the findings of this Interim SA Report, responses to the current consultation, further evidence gathering and further appraisal work.

The SA Report will be published alongside the Publication LPR, providing all the information required by the SEA Regulations 2004.

Submission, examination and adoption

Once the period for representations on the Publication LPR / SA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed ‘sound’. If this is the case, the plan will be submitted for Examination, alongside a summary of the main issues raised during the consultation. The Council will also submit the SA Report.

At Examination, the Inspector will consider representations (alongside the SA Report) before concluding on necessary modifications. Modifications will then be prepared (alongside SA if necessary) and then subjected to consultation (with an SA Report Addendum published if necessary).

Once found to be ‘sound’ the LPR can be adopted by the Council. At that time a ‘Statement’ must be published that sets out certain information including ‘the measures decided concerning monitoring’.

Monitoring

There is an increased focus on monitoring nationally, in light of the proposal to reform plan-making to ensuring a clearer focus on achieving clear ‘outcomes’. Section 11 of the main report makes a number of suggestions.