

Policy and Programmes

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24 February 2025

Dear Cherwell District Council

Thank you for the engagement opportunity on your Cherwell Local Plan 2040 Regulation 19 consultation.

Vision and Strategic Objectives

The consultation presents three overarching themes for the local plan to focus on:

- *Meeting the Challenge of Climate Change and Ensuring Sustainable Development*
- *Maintaining and Developing a Sustainable Local Economy*
- *Building Healthy and Sustainable Communities*

These proposed themes are sound, as well as the Cherwell Local Plan vision which is aligned at a high level to the Oxfordshire Strategic Vision.

Spatial Strategy

The summary of the overall strategy is to:

- *Ensure that our committed growth is delivered*
- *Focus new development at Banbury and Bicester and to a lesser extent in the Kidlington area*
- *Revitalise our urban centres and encourage investment*
- *Raise the design quality of our built and 'green' environments*
- *Minimise carbon emissions and achieve set net gains in biodiversity in delivering new development*

The spatial strategy is sound. We note that the strategy has changed from the Regulation 18 strategy in how it deals with Oxford's unmet need, and we acknowledge that the new approach refers to unmet need that is already committed to in the adopted local plan, which we believe to be a sound approach.

Green Belt

The Local Plan's response to the Green Belt challenges is sound. The plan no longer proposes the removal of land from the Green Belt, and the Rural Areas strategy references maintaining the designated Green Belt.

Housing Need

The Government sets out in the NPPF/PPG that it expects all authorities to follow the standard method to determine the number of homes needed, unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals (National Planning Policy Framework paragraph 61).

The Regulation 19 Local Plan consultation document uses the pre-December 2024 local housing need, using the standard method). This is a sound policy and a sound approach to determining Cherwell's housing need. We also agree with the decision not to rely anymore upon the Oxford and Cherwell evidence in the Housing and Economic Needs Assessment (HENA), as following the Inspectors' findings on the Oxford Local Plan, this cannot be relied upon as justified evidence for the plan.

The Cherwell Local Plan uplifts its housing requirement to accommodate 4,400 homes for Oxford's unmet housing need, which reflects Oxford's existing unmet need from the Oxford Plan 2036. This is consistent with the approach of the emerging South and Vale Joint Local Plan, and we believe this to be a sound approach.

Housing Supply

The plan proposes to include an additional supply of around 4,000 homes to ensure a five-year housing land supply at the point of adoption, and a steady supply of homes for social/affordable housing. We do not consider this a soundness concern but would encourage Cherwell District Council to explore the opportunities for a stepped trajectory through the examination in public to supplement to this approach.

Employment

The Regulation 19 consultation document identifies a large employment need of around 277 hectares (ha) from 2021 to 2042, although it notes that these are provisional figures. Further clarity has been provided to identify the breakdown of the employment supply that meets some of the employment need, alongside a permissive criteria-based policy support of windfall sites, however, some supply remains outstanding. The accompanying sustainability appraisal reflects this by identifying that the plan will now have a 'moderate/uncertain' effect on economic objectives, which is an improvement from a 'potential negative' effect at Regulation 18 stage.

We recognise that there are additions to the employment supply, especially around Bicester. The employment supply and related policies are sound, although we suggest that there is still more to do on securing long-term employment growth around Kidlington or other areas that could help to support economic growth around the Knowledge Spine.

Sustainability Appraisal

We note that the SA¹ accompanying the Local Plan includes some unsupported assumptions about future Oxford unmet housing need (para 5.2.25), but the plan takes no action related to these assumptions.

Duty to Cooperate

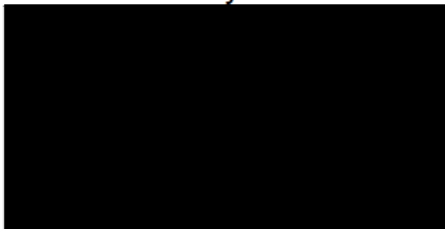
We observe that the new Duty to Cooperate Statement is accurate and we will collaborate on a Statement of Common Ground if sought by Cherwell District Council.

Other matters

We would like to continue to work together and would welcome working collectively on the in-combination impacts in relation to the Habitat Regulations Assessment, and with Natural England. Oxford Meadows SAC falls partly within Cherwell (Yarnton Parish) and our collective impact on it must continue to be assessed and a satisfactory work programme is underway to achieve this. We support those efforts, which will be important to help demonstrate the soundness of our own Joint Local Plan. Similarly, we would welcome collective working to mitigate the impacts of capacity at Oxford Sewage Treatment Works.

We would welcome the opportunity to discuss our comments with you and wish you well in the next stages of the development of your local plan.

Yours sincerely



Planning Policy Team Leader

¹ https://cherwell.citizenspace.com/planning-policy/cherwell-local-plan-review-2042/user_uploads/cherwell-local-plan-sa---sa-report-241211.pdf