

TOWN AND COUNTRY PLANNING ACT 1990

ADDENDUM PLANNING STATEMENT

TO ACCOMPANY A PLANNING APPLICATION FOR

APPLICATION FOR OUTLINE PLANNING PERMISSION (ALL MATTERS RESERVED EXCEPT MEANS OF ACCESS (NOT INTERNAL ROADS) FROM B4100) FOR THE ERECTION OF BUILDINGS COMPRISING LOGISTICS (USE CLASS B8) AND ANCILLARY OFFICES (USE CLASS E(G)(I)) FLOORSPACE; ENERGY CENTRE; HGV PARKING; CONSTRUCTION OF NEW SITE ACCESS FROM THE B4100; CREATION OF INTERNAL ROADS AND ACCESS ROUTES; HARD AND SOFT LANDSCAPING; THE CONSTRUCTION OF PARKING AND SERVICING AREAS; SUBSTATIONS AND OTHER ASSOCIATED INFRASTRUCTURE.

ON LAND AT OS PARCEL 6124 EAST OF BAYNARDS GREEN FARM, STREET TO HORWELL FARM, BAYNARDS GREEN (SYMMETRY PARK ARDLEY)

ON BEHALF OF TRITAX SYMMETRY ARDLEY LTD

APPLICATION NO. 22/01340/OUT

MAY 2024

OUR REF: PF/10679

Chartered Town
Planning Consultants



CONTENTS

1.0	Introduction	3
2.0	Updated Planning Policy Context	7
3.0	Response to Consultation Comments Received	12
4.0	Conclusions	27

Appendix 1 Original Planning Statement May 2022

Appendix 2 Response to Parish Council comments



1.0 INTRODUCTION

- 1.1 The Addendum Planning Statement is in support of an amended planning application submission, including a 2024 update to the Environmental Statement which has been prepared to address changes that have been made to the plans for Symmetry Park, Ardley, and provides additional information in response to comments received on the scheme since submitted.
- 1.2 This Addendum Planning Statement should be read alongside the Planning Statement dated May 2022 (as appended).
- 1.3 In May 2022 Tritax Symmetry Ardley Limited (the Applicant) (TSL) submitted a planning application to Cherwell District Council (CDC, the Council) seeking outline planning permission for the development of buildings on land either side of the B4100, to the east of the A43. The application is registered under CDC planning reference 22/01340/OUT.
- 1.4 In the period since the planning application was submitted in 2022, discussions have taken place between the Applicant, CDC and consultees regarding the proposals. As a result, a number of changes have been made to the proposed scheme. These have been submitted to CDC as an update to the planning application and include a 2024 updated to the Environmental Statement (ES).
- 1.5 The scheme has been amended as follows:
 - Minor amendments to the unit heights of the proposed development. The proposed unit heights are: Building heights, overall, the main built structures would be up to a maximum of 140.350 m AOD in Zone A1; 137.350 m AOD in Zone A2; and a maximum of 134.415 m AOD in Zone B;
 - Introduction of the strategic landscape bund and enhanced planting along the eastern boundary: as a result of the assessment, and comments raised on the 2022 submission, the developable area was moved away from the boundary, resulting in a minimum buffer distance from the eastern planning boundary of 45.100m (Zone A) and a minimum buffer distance from the eastern boundary of 138.3m (Zone B);
 - The strategic landscape bunds having been increased in height, with minimum heights now proposed. The strategic landscape bund in Zone A has a minimum top of bund height of 119.200 m AOD and in Zone B minimum top of bund height of 116.500 m AOD.
 - Landscaping proposals have been updated to reflect the above;
 - At the time that the technical work presented in the original Transport Assessment (TA) was undertaken, there was an expectation that the Baynards Green roundabout would become signalised under the terms of the Oxford Growth Fund. However, in the time that has elapsed since the Albion Land (AL) on the adjoining site and TSL applications were submitted the monies identified for the Baynards Green roundabout upgrade has been reallocated elsewhere in the County. To this end, and in recognition of feedback provided by NH on the respective applications, a revised mitigation strategy has been developed in conjunction with the Highways Authorities. This comprises the full signalisation of the roundabout and widening on the approaches and circulatory carriageway and incorporates active mode infrastructure to ensure pedestrians and cyclists are able to navigate the junction.



- 1.6 Changes to the Parameter Plan (ref DR A-131002 P6) are:
 - An increase of 1.05 m in the maximum building height across Zone A1;
 - A reduction of 0.15 m in the maximum building height across Zone A2;
 - A reduction of 1.435 m in maximum building heights on the southern area (Zone B);
 - Proposed B4100 bus stop/shelter locations moved west.
- 1.7 Whilst not a plan submitted for approval, or an EIA plan, it is also relevant to note changes to the Illustrative Masterplan (ref DR-A-001010- P8), albeit it is noted that these are illustrative only:
 - Minor changes to the alignment of estate roads and parking areas;
 - Energy centre moved to the middle of the Site;
 - Attenuation basins shown in accordance with updated drainage strategy;
 - Park trail shown as a circular recreation path with activity stations.
- 1.8 In summary there have been changes to the Parameter Plans, including the area shown for proposed development is positioned further back from the eastern boundary, with a corresponding increase in the width of the landscaping; further details of the earth bund proposed along the eastern boundary; and a reduction in overall building heights on the eastern and southern areas. These changes have been made in response to comments and concerns expressed on the application to date.
- 1.9 Key additional information, associated with Symmetry Park Ardley, that has come forward since the 2022 application was submitted, includes:
 - Results of the Archaeological Evaluation (including the results of the programme of trial trenching on the site);
 - An Addendum Transport Assessment (TA) which includes the results of additional modelling undertaken for the proposals;
 - Updated Ecological Surveys including breeding bird surveys and bat activity surveys;
 - A new Flood Risk Assessment report including trial pit logs and soakaway testing Results for Symmetry Park Ardley;
 - Additional Viewpoints and wirelines including wirelines to show the development in winter months in response to comments received from the Council's appointed landscape consultant, LUC.
- 1.10 Alongside this submission is an Environmental Assessment update, which brings the environmental information provided in the 2022 Environmental Statement (ES) accompanying Planning Application ref: 22/01340/OUT, up to date.
- 1.11 The enclosed Environmental Statement updated 2024, includes addendums to the following chapters of the ES:
 - Non-Technical Summary
 - Chapter A ES Update Introduction
 - Chapter 01 Introduction minor text updates
 - Chapter 02 Site Description and local context minor text updates
 - Chapter 03 Description of development scheme description updated
 - Chapter 04 Approach to assessment update of Table 4.2
 - Chapter 05 Transport updates to reflect current policy and guidance, identification of mitigation, and revisions to the assessment
 - Chapter 06 Air Quality updates to reflect current policy and guidance, and revisions to the assessment



- Chapter 07 Noise and Vibration updates to reflect current policy and guidance, and revisions to the assessment
- Chapter 08 Biodiversity assessment update
- Chapter 09 Landscape Effects and Visual Amenity assessment update
- Chapter 10 Assessment updated to reflect the above and additional survey information
- Chapter 11 Hydrology, flood risk and drainage assessment & policy/guidance updates
- Chapter 12 Socio-economic assessment updates, policy and guidance
- Chapter 13 Climate change assessment updates, policy and guidance
- Chapter 14 Ground conditions no change
- Chapter 15 updated to reflect any changes in the assessments
- 1.12 The ES Appendices include new and updated information showing:
 - Appendix 5.2 Transport Assessment addendum
 - Appendix 6.1 Road Traffic Emission Assessment Methodology
 - Appendix 6.2 Model Verification
 - Appendix 6.3 Construction Dust Mitigation Measures
 - Appendix 6.4 Ecological Assessment Results
 - Appendix 6.5 Figures
 - Appendix 8.3 Ecological baseline update (2022 & 2023)
 - Appendix 8.4 Biodiversity Net Gain Assessment
 - Appendix 9.1 Landscape and Visual Assessment LVIA baseline assessment
 - Appendix 9.2 Table of Effects: Visual Amenity
 - Appendix 9.3 Cumulative assessment
 - Appendix 9.4 Arboricultural Impact Assessment
 - Appendix 9.5 Wirelines
 - Appendix 9.6 Photomontages
 - Appendix 9.8 Illustrative Landscape Strategy
 - Appendix 9.9 Landscape Sections
 - Appendix 10.1 Archaeological and Heritage Assessment
 - Appendix 10.3 Consultation
 - Appendix 10.4 Written Schemes of Investigation for the Assessment and Surveys
 - Appendix 10.5 Written Scheme of Investigation for Archaeological Mitigation
 - Appendix 11.1 Flood Risk Assessment
- 1.13 Also attached are the following submission documents which have been updated to reflect the current scheme:
 - Parameters Plan ref: 14-019-SGP-xx-xx-DR-A-111003 Rev P6
 - Illustrative Masterplan ref: 14-019-SG1-xx-xx-DR-A-001010 Rev P8
 - Access Plan ref: 216285/PD10 Rev B appended to Transport Statement
 - Updated Market Analysis
 - Design and Access Statement
 - Sustainability Statement
 - Transport Topic Paper
- 1.14 The next sections of this Addendum Planning Statement are as follows:



- Section 2 provides a summary of any updates to the planning policy context within which the application will be determined;
- Section 3 demonstrates how the amended submission has responded to statutory consultee comments to the original planning application submission;
- Section 4 provides conclusions.



2.0 UPDATED PLANNING POLICY CONTEXT

2.1 This section provides a review of updated relevant policy (Local and National) since the May 2022 original planning application submission (and of related evidence base documents including employment land studies).

Emerging Cherwell Local Plan Review

- 2.2 The current local plan, is the Adopted Cherwell Local Plan 2011-2031 (Part 1), however, the Cherwell Local Plan Review 2040 Consultation Draft (Regulation 18) was published in September 2023. As the plan is at an early stage in the plan making process it can only be afforded limited weight. However, the published evidence base in support of the emerging plan is a material consideration in the determination of this application.
- 2.3 The Cherwell Local Plan Review 2040 Consultation Draft (Regulation 18) states in Core Policy 25 that:

'The Housing and Economic Needs Assessment (2022) identifies a need for between 274 and 283 hectares of employment land in Cherwell over the period 2021 to 2040. (paragraph 3.119)'.

- 2.4 The Council's latest available evidence base, includes the LSH's Employment Land Availability Study (2022) commissioned by Cherwell District Council. The Council's latest Employment Land Review, prepared by LSH in October 2022, identifies a need significantly higher than the proposed allocations in the draft local plan. Their report of October 2022 finds that there is demand for approx. 220 ha of employment land over the plan period (2021-2040), out of which approx. 187 ha are for B2/B8 use class. The Council also commissioned LSH to carry out an Economic Needs Assessment. Their report of September 2021 finds that there is demand for approx. 188 ha, which converts to annual demand for approx. 9.89 ha/422k sq.ft of B2/B8 floorspace. LSH also provide an alternative assessment based on past completion rates and conclude that the forecast based on this methodology is 262 ha over the plan period, which converts to annual demand for approx. 13.79ha/588k sq.ft.
- 2.5 The Council's own evidence base clearly identifies a need significantly higher than the proposed allocations in the emerging local plan. This discrepancy is addressed by proposed 'Core Policy 27 New Employment Development on Unallocated Sites'. It states:

'Proposals for new employment development (Use Classes E(g), B2 or B8) will be supported on unallocated sites in or on the edge of, the built-up area of main Towns, Local Service Centres and Larger Villages, where there are exceptional circumstances, provided that the benefits are not outweighed by any harmful impacts, taking into account [...] a demonstrable need for the employment that cannot be accommodated on existing allocated sites;...'

- 2.6 The latest available evidence base is the Cherwell District Council's Economic Needs Assessment (ENA) (2021), which acknowledges the latest trends, such as re-shoring of supply chains and online retail. It states that:
 - '...large logistics warehousing and distribution [sites in the area] have been popular with on-line retailers, distributors and Tech companies alike'. (page 34).
- 2.7 The study estimates that there is a need to create up to 47% net-additional (i.e. accounting for losses of existing stock) employment land for transport and storage by 2040. This is equivalent to an increase of approx. 2.1% p.a. over this time period. Similar to the Updated Cherwell Employment Land Forecasts (2014) the forecast considers the whole market, including demand for smaller units.



2.8 The ENA also provides evidence of the need/demand for logistics development along the M40 corridor (paragraphs 5.3.1 - 5.3.3):

'Demand is reported from a wide range of occupiers. The largest units are primarily sought by logistics and distribution companies looking for presence on the M40. There is significant demand in the area from national chains and distributors. Stakeholders reported numerous enquiries from occupiers looking for units of 100,000-200,000 sq ft around J11 of the M40 which were not able to be met in the area currently. This shortage of space and backlog of enquiries has made it very easy to let any new space coming forward.

Regional distribution companies are increasingly looking beyond the traditional areas of the M1 corridor and the 'Golden Triangle' (centred around the M1, M6, and M42) and the M40 corridor is an expanding market for regional logistics operators. The M40 in Cherwell is an attractive location due to its relative proximity to London but lack of designation such as Green Belt or Area of Outstanding Natural Beauty (AONB). Cherwell is also well located for the A34 / A43 corridor providing a connection with the port at Southampton which is better than that provided by the M1 corridor. Currently the M40 is a cheaper location than the Golden Triangle, increasing its attractiveness. The local workforce was also cited as a positive factor, particularly with regards to J11 at Banbury, however J9 and J10 are also both seen as excellent locations with good access to Bicester.

However, there is a significant undersupply of available sites within the M40 corridor, meaning that all suitable sites within Bicester have gone. This is due in part to a notable increase in take-up in the last two years due to structural changes following the pandemic. This has accelerated the demand and the supply has failed to keep up. Some stakeholders stated that there needs to be a criteria-based policy to account for such step changes in future to ensure unforeseen market changes could be accounted for within the plan process'.

2.9 The ENA also goes on to states at paragraph 5.3.7:

'Key demand is for unit sizes 200,000-300,000 sqft. This would typically require minimum site requirements of around 8-10 ha. Operational requirements are: - access to the strategic road network, principally the M40 motorway - 24-hour operations 7 days a week; and - Siting away from residential uses but close to labour markets.

- 2.10 As stated above, the Employment Land Availability study (2022) finds that there is demand for approximately. 220 ha of employment land over the plan period (2021-2040), out of which approximately 187 ha are for B2/B8 use class (page 14). This converts to an annual demand estimate of approximately 9.84 ha/420k sq.ft, which is in line with the annual demand for approximately 9.89 ha/422k sq.ft of B2/B8 floorspace identified in the Economic Needs Assessment (2021). It is clear that the Council will have to allocate a substantial amount of additional land to meet future requirements of the logistics sector.
- 2.11 TSL have submitted representations to the Consultation Draft which, in summary, state that as the Council have failed to allocate sufficient land, the emerging development plan policy is simply too weak and does not set out a clear economic strategy which positively and proactively encourages sustainable economic growth, having regards to Local Industrial Strategies and other local policies for economic



- development, which is required by Paragraph 86 criteria a) of the NPPF. Failure to do so in light of the clearly identified need means that the current draft Plan is not positively prepared.
- 2.12 The Consultation Draft plan also states that the Council will work with partners to minimise freight trips on the road network and promote safe, clean and efficient freight movements and a new Core Policy is proposed which recognises the need to put logistic development next to the strategic road network, proposed Core Policy 23 states:

'Freight Development proposals for logistics and distribution, that generate a significant number or intensity of transport movements, will be required to demonstrate that:

- They are conveniently located to enable direct routeing to the strategic road network;
- ii. There is no unacceptable impact on residential areas, local air quality, local amenity, or the highway network, and
- iii. There would be no unacceptable impact on landscape, local character and biodiversity. Local delivery hubs that reduce traffic will be supported particularly where it would lead to a reduction in noise and emissions from local freight trips and enable sustainable last-mile movements'.

National Policy Context

- 2.13 The National Planning Policy Framework (NPPF) was revised in December 2023. It sets out the government's planning policies for England and how such policies are expected to be applied, the employment policies in the 2023 NPPF generally replicate that in the previous re-iterations of the NPPF.
- 2.14 The purpose of the NPPF is to contribute to the achievement of sustainable development via three overarching objectives: economic, social and environmental. The "economic objective" (8a) is to 'help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure'.
- 2.15 Paragraphs 85-87 require planning policies and decisions to support economic growth and productivity. The emphasis on productivity and growth is particularly relevant given that the proposed development seeks to tap into the strong growth from the transport and storage sector. Paragraph 85 states:

'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.'

2.16 In particular, paragraph 87 states that:

'Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for storage and distribution operations at a variety of scales and in suitably accessible locations'.

2.17 The National Planning Policy Guidance (NPPG) paragraph: 031 Reference ID: 2a-031-20190722 also specifically references the logistics sector stating that:



'The logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities, and has distinct locational requirements that need to be considered in formulating planning policies (separately from those relating to general industrial land)'.

- 2.18 The Department of Transport published the 'Future of Freight Long Term Plan' in June 2022. This has been developed in partnership with industry, this plan sets out the government's long-term vision for the UK freight sector. It identifies the main challenges, objectives and actions that need to be taken in the following 5 priority areas: National Freight Network (NFN); enabling the transition to net zero; planning; people and skills and data and technology.
- 2.19 Section 5 sets out a Strategic Goal which is a planning system which fully recognises the needs of the freight and logistics sector, now and in the future, and empowers the relevant planning authority to plan for those needs. Paragraphs 5.6 to 5.8 state:

'The planning system can help to facilitate the needs of the freight and logistics sector. From national policy and guidance to the local plan making and decision taking, the system can help to allocate land in the right places to support the economy, which includes the freight and logistics sector, to ensure sufficient land is available to meet their needs now and in the future. Existing freight provision needs to be appropriately supported and can expand, adapt and innovate including for the rollout of new technologies to decarbonise freight end-to-end.

The freight sector and logistics industry should be confident in engaging and working with local planning processes, so local planning authorities are empowered to understand their development needs. Developers and operators should work collaboratively with local authorities and properly engaging with all stages of the planning process to secure better outcomes.

The freight sector relies on different modes of transport to move goods and this means the planning system needs to make land available for the receipt, storage, processing, interchange and distribution of goods. We need a supply chain network that is secure, predictable, reliable, and resilient with no link in that chain overlooked, including the need to provide the right high-quality facilities and infrastructure required to support freight and logistics workers. Local planning and highways authorities have a crucial role to play in planning for delivery of the right infrastructure, where it is needed and at the right time, to support the sector.'

Other Evidence (since 2022 submission)

- 2.20 Since the 2022 submission of the planning application further evidence of the continuing need for logistics floorspace as follows:
 - The growth in demand for logistics space is reflected in the Savills' 'Big Shed Briefing Paper, January 2024'. At a national level, take-up for 2023 has reached 29.1m sq.ft across 130 transactions, a 40% fall year on year, but 12% above the pre-Covid average, signalling a return to more normal market conditions after a record-breaking period. Savills expect online retail, a key driver behind logistics demand, to keep growing, with online retail penetration forecast to increase by 7% year on year, reaching 28.4% by 2027. This



- growth, using research from Prologis, should equate to additional logistics demand of up to 48m sq.ft over the period
- The 'Industrial & Logistics Market Report' 2024 by LSH reports that UK-wide take-up hit an impressive 42.3 million sq. ft for the year.
- The Q4 2023 'UK Logistics & Industrial National Outlook by Cushman & Wakefield' reports that take-up has shown early signs of recovery with a total volume of 10.25 million sq. ft. transacting during the quarter. The volume of space under offer has also risen, now standing at 9.7 million sq. ft. up from 8.5 million sq. ft. during Q3 2023.



3.0 RESPONSES TO COMMENTS RAISED

- 3.1 This section sets out how the amended submission has responded to comments raised on the submitted planning application from Statutory Consultees and by local Parish Councils.
- 3.2 Of note, to date on the submitted planning application, comments received from statutory consultees confirm no objections (subject to appropriate conditions being attached to the planning permission) from:
 - The Environment Agency;
 - Historic England;
 - Natural England;
 - The Council's Heritage/Conservation Officer;
 - The Council's Environmental Health Officer in relation to contaminated land; air quality; odour and light;
 - Oxfordshire Fire Service;
 - The Council's Land Drainage Officer;
 - The Council's Landscape Officer;
 - National Highways;
 - Anglian Water.
- 3.3 There is nothing in the addendum submission which should alter these agreed positions.
- 3.4 The amended submission positively addresses the comments received from (as summarised in more detail below):
 - The County Council's Archaeologist;
 - The Council's Environmental Health Officer in relation to noise;
 - Oxfordshire County Council Highways;
 - The Council's Rights of Way Officer;
 - The Council's Ecology Officer;
 - The Wildlife Trust;
 - Oxfordshire County Council (LLFA);
 - The Council's Economic Officer;
 - The Council's Planning Policy Officer.

Archaeology

3.5 In accordance with the advice received from the Lead Archaeologist, the excavation of a series of evaluative trenches to determine the presence and significance of any assets of archaeological interest within the Site was undertaken in 2022. The Environmental Statement update 2024 confirms that based on the results of this initial trial trenching, the requirement and scope of further archaeological mitigation has been agreed through further consultation with Oxford County Council Archaeological Services.-This is-to be implemented across three relevant parts of the proposed development area either in advance of, or during, the relevant phase of construction works, and can be secured by standard condition.



Environmental Health (Noise)

- 3.6 The Environmental Health officer queried the night-time noise levels of the Lone Barn residence, which is located near the site, and asked for confirmation on how this has been addressed and where. The Environmental Statement update 2024 assesses the impact of the development both during construction and during operation, and cumulatively with other developments.
- 3.7 The Environmental Statement update 2024 confirms that with the implementation of a varying height acoustic bund to the east of the proposed development) that the impact of the development in the operation phase, as follows:
 - During the daytime, the rating level of the proposals would be below the background sound level at all receptors assessed. The impact and associated effect is Negligible, which is not Significant.
 - During the night-time the rating level of the proposals would be equal to the background sound level at Lone Barn and below the background sound level at all other receptor positions. The impact and associated effect is Negligible, which is not Significant.
- 3.8 When assessed cumulatively with other development, it is concluded that the effects are not significant for noise arising from construction activities, including construction traffic and then for the operational phase the effects are not significant for noise arising from on-site traffic movements and fixed plant associated with the proposal, or for the noise impact of increased traffic movements on transport links to and from the site.

Transport

- 3.9 Following extensive discussions with National Highways (NH) and the Local highways Authority (Oxfordshire County Council (OCC)), an Addendum Transport Assessment and a Transport Topic Paper is submitted with the amended planning application submission. Notably NH have now confirmed that they have no objections to the proposals subject to conditions being attached to any grant of planning consent.
- 3.10 The Transport Topic Paper sets out the Sustainable Transport Strategy for the proposals and summarises, in achieving sustainable development, the NPPF confirms the planning system has three overarching interdependent objectives. These are stated at paragraph 8 to be:
 - an economic objective to help build a strong, responsive and competitive economy, by
 ensuring that sufficient land of the right types is available in the right places and at the
 right time to support growth, innovation and improved productivity; and by identifying
 and coordinating the provision of infrastructure
 - a social objective to support strong, vibrant and healthy communities, by ensuring that
 a sufficient number and range of homes can be provided to meet the needs of present
 and future generations; and by fostering well-designed beautiful and safe places, with
 accessible services and open spaces that reflect current and future needs and support
 communities' health, social and cultural well-being; and
 - an environmental objective to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.



3.11 The NPPF Paragraph 85 states:

'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.'

3.12 With the NPPF paragraph 8 objectives in mind, paragraph 109 states from a transport perspective that:

"...Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both planmaking and decision making."

3.13 When the NPPF refers to sustainable transport modes, it is worthy to take into account the definition that is provided in its Glossary which is namely:

'Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, ultra low and zero emission vehicles, car sharing and public transport.'

3.14 Moreover, paragraph 89 of the NPPF states:

'Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or **by public transport**). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.' (our emphasis).

- 3.15 In the context of the comments received from OCC, and particularly in relation to the provision of a pedestrian and cycle route to Bicester, it is important to recognise that the NPPF makes a very clear distinction that opportunities to provide enhanced sustainable transport measures varies depending on where a site is located. In a similar regard, it is clear that an appropriate balance needs to be identified in so much as the core objectives of sustainable development, as identified by the NPPF can be achieved.
- 3.16 From a freight industry perspective, which this development will make a positive contribution towards, it is of course pertinent to recognise that they will inevitably generate additional HGV movements. To this end, both National (i.e. NPPF) and Regional policy (i.e. OCC Freight and Logistics Strategy) direct such development to be located adjacent to the Strategic Road Network.



3.17 Paragraph 87 of the NPPF states:

'Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.' (our emphasis)

3.18 Paragraph 87 is supported by NPPG (paragraph: 031 Reference ID: 2a-031-20190722 (Revision date: 22 07 2019), which states that:

'The logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities, and has **distinct locational requirements** that need to be considered in formulating planning policies (separately from those relating to general industrial land)." (our emphasis)

3.19 In the case of Regional policy, OCC has developed a Freight Map (see Appendix C), which shows the proposed development is well located to this and therefore are well placed to abide by the following objective:

'We will seek to influence the location and design of new development, particularly employment sites and any related transport infrastructure, so that these can function well, with appropriate freight access to and from the strategic transport network without adverse impacts on local communities, other road users and the environment. This includes ensuring new developments incorporate the needs of emerging technologies.'

3.20 The England Economic Heartland report 'Connecting People Transforming Journeys' (2021) Policy 35 states that:

'We will work with Highways England, local highway authorities, local planning authorities and the freight sector to ensure that strategic corridors for road freight and logistics are fit for purpose: priority will be given to the following corridors: the M25/M1; **the A34 and M40 north of Oxford**; the A1 corridor (north of Huntingdon); the A14; and the A508 into Northampton.' (our emphasis)

- 3.21 The report states that they will work with Highways England, local highways authorities and the freight sector to ensure the key parts of the Strategic Road and Major Road Networks continue to support the movement of road haulage and thereby minimise the impact of road freight on local communities.
- 3.22 The key criteria for a successful logistics site are: motorway proximity; junction access; connectivity to road, rail, air and sea; as well as the size of the site and the potential quantum of accommodation. Economic and labour market considerations are also key drivers for the suitability of a site and location as a logistics hub, in addition to the transport links and connectivity that the site benefits from.



- 3.23 The development will provide high quality logistics floorspace in location ideally placed to address the growing need for logistics floorspace as it will be highly accessible to the strategic road network (which as set out above is a fundamental requirement of logistics operators).
- 3.24 It is clear from the respective national and regional strategies for freight, that there is a general direction to locate developments, such as those proposed by AL and TSL, adjacent to key strategic routes and away from sensitive urban communities. Invariably this will result in logistics sites being located in areas that are more rural in appearance and function.
- 3.25 To this end, the measures that could reasonably be expected to be required to make a site more sustainable are limited, particularly in the context of OCC's acceptance that the consequences of supporting infrastructure should not have an adverse effect on the environment and other road users. Equally, paragraph 89 of the NPPF makes a clear distinction that not all modes of transport need to be upgraded to enhance the overall sustainability of a rurally located development.
- 3.26 With this in mind, and taking into account feedback provided by OCC to date, TSL are committed to the promotion of sustainable travel. The improvements committed in the planning proposals include:
 - 25% of total parking to provide active EV charging spaces on both the AL and TSL schemes, which accords with current OCC guidance.
 - New bus stops on the B4100 in-between the AL eastern and TSL site accesses, which have been designed in accordance with current OCC guidance.
 - A new bus stop in the western AL development, which accords with current OCC design guidance.
 - Financial contributions towards upgrading an existing bus route that operates between Bicester and Brackley in line with a methodology calculated by OCC Public Transport officers, which identifies a figure of £2,133,333.
 - Dedicated active mode infrastructure between the respective sites and the dedicated crossing facilities incorporated into an upgraded Banyards Green roundabout junction, which is discussed in greater detail below and responds to the request of OCC to cater for trips to/from the adjacent local services.
- 3.27 The submitted Framework Travel Plan contains details of the measures incorporated to reduce the impact of transport associated with the development.
- 3.28 No other measures are required to mitigate significant effects of the proposals. However, in addition to the above, the following potential measures are being explored:
 - Financial contributions towards a further upgrade to the existing Bicester to Brackley bus service that would result in a further £1,800,000 being required in line with a methodology calculated by OCC Public Transport officers;
 - Financial contributions towards enhancing access to the Public Rights of Way network;
 - Creation of a new pedestrian and cycle route to/from Bicester along the B4100, having regard to the acceptable specifications provided by OCC on 20th October 2023 (see Appendix D) 1; and,
 - Upgrading bus waiting areas within Bicester to incorporate cycle parking facilities at bus stops that serve the existing bus route that operates between Bicester and Brackley, which allows residents of Bicester to undertake a longer distance journey by a combined cycle and public transport trip.



- 3.29 Paragraph 114 of the NPPF states that in assessing specific applications for development, it should be ensured that, inter alia, appropriate opportunities to promote sustainable transport modes can be or have been taken up, given the type of development and its location. It is the view of TSL that recognising the specific location requirements of the logistics sector, the schemes exploit the available opportunities to make the schemes suitably accessible by appropriate sustainable travel modes.
- 3.30 With regards to the addendum Transport Assessment, this concludes that at the time that the technical work presented in the original Transport Assessment (TA) was undertaken, there was an expectation that the Baynards Green roundabout would become signalised under the terms of the Oxford Growth Fund. However, in the time that has elapsed since the application was submitted the monies identified for the Baynards Green roundabout upgrade has been reallocated elsewhere in the County.
- 3.31 To this end, and in recognition of feedback provided by NH on the respective applications, a revised mitigation strategy has been developed in conjunction with NH and OCC. As with the Oxford Growth Fund scheme, this comprises the full signalisation of the roundabout and widening on the approaches and circulatory carriageway. However, unlike the Growth Fund scheme, the design developed by the adjoining site Albion Land AL and TSL incorporates active mode infrastructure to ensure pedestrians and cyclists are able to navigate the junction.
- 3.32 The outcome of the traffic modelling that has been undertaken has shown that the abovementioned mitigation scheme is able to satisfactorily accommodate traffic associated with schemes. Indeed, it is forecast to provide significant benefits when compared to the current situation, which is one where operational stress results in significant peak hour queuing, and that which was envisaged by the previous Oxford Growth Fund scheme).
- 3.33 The design has been agreed in principle with National Highways (NH) and OCC and the outcome of an independent (Stage 1) Road Safety Audit has indicated that there are no inherent safety issues associated with its design. There is thus a scheme at Baynards Green roundabout that mitigates the residual cumulative effects of the proposed developments in a safe and suitable manner.
- 3.34 In addition to the capacity tests undertaken at Baynards Green roundabout, it should be noted that the following junctions have also been assessed (as agreed with NH and OCC):
 - M40 J10
 - AL eastern and western site accesses
 - TSL site access
 - B4100/A4095
- 3.35 In terms of M40 J10, it has been established (through highways modelling) that when compared to the reference case (i.e. no development and the current Baynards Green roundabout being retained), the combined developments and junction improvement at Baynards Green will reduce delays and incidences of queuing across the M40 Junction 10 network. The efficacy of the works to address the proposed developments is therefore not externally constrained and no other works are required. Indeed, NH confirmed through the Baynards Green design evolution that there would not be any adverse effect on the slip roads at Junction 10 with queues not blocking back to the mainline of the M40.



- 3.36 For the site access the outcome of modelling all confirms that it is of a sufficient size to safely accommodate demands associated with the proposed developments in isolation and cumulatively. Indeed, it has been shown that the operation of these junctions will not experience any blocking back of queues to/from adjacent junctions (incl. the upgraded Baynards Green roundabout) to the detriment of the free flow of traffic.
- 3.37 Whilst the original TA for the site assessed the performance of the B4100/A4095 based on the current roundabout junction, it was recognised that this junction had been identified as being converted to a traffic signal scheme. In the time that has elapsed since the application was submitted, OCC has granted itself consent for a traffic signal scheme under the provision of County application 23/02852/OCC / R3.0094/21. This application was supported by a range of transport documents including a Transport Statement and VISSIM Forecast Technical Note prepared by Aecom that was informed by a model that tested traffic flows extracted from the BTM.
- 3.38 When considering the impacts of the proposals, the highways consultant has similarly referred to a VISSIM model developed having regard to the approved traffic signal design pursuant to County application ref. 23/02852/OCC / R3.0094/21 but using the BTM flows that have been used to inform the modelling of all other junctions. The outcome of this assessment has confirmed the approved traffic signal scheme, which is understood to be identified for construction this year, will experience only modest increases in delays as a result of the proposed developments in isolation and cumulatively. Accordingly, the effects of the TSL proposals (and cumulatively with the AL scheme) are not severe at this location.
- 3.39 On the basis of the modelling that has been undertaken in response to the comments received from NH and OCC on the application, it is clear that either on its or own or with the cumulative effects of the two proposed developments, the proposals will not lead to a severe residual cumulative effect on either the strategic or local road networks. In this regard, the proposed developments do not exceed the assessment threshold outlined in NPPF paragraph 114 (d) and are thus entirely acceptable from a highway impact perspective.
- 3.40 The Transport Assessment Addendum for the application concludes:
 - Appropriate opportunities to promote sustainable transport modes have been taken up, given the type of development and its location. In particular, the site will provide two new bus stops with contributions provided to an enhanced bus service, opportunities to provide a shared foot/cycleway link to Bicester have been explored, and, a trim trail will be provided at the TSL development for use by staff;
 - Safe and suitable access to the site can be achieved for all users. This has been confirmed
 through the Stage 1 RSA of the proposed access arrangement which incorporates active
 travel facilities alongside being designed for all vehicles that are expected to require
 access to the site.
 - The design of streets, parking areas, other transport elements and the content of associated standards will reflect the guidance in place at the time of a reserved matters application. This will include parking provision for cars, electric vehicles, cycles and HGVs.
 - The impacts of the development on the transport network in terms of capacity, congestion and highway safety have been addressed and mitigated, in particular through an improvement scheme at the Baynards Green roundabout.



Public Rights of Way

3.41 . On the Illustrative Masterplan pedestrian amenity is provided in the form of an Indicative Trim Trail shown on the illustrative masterplan. Furthermore, contributions towards improving access to the Public Rights of Way network are being discussed with the Council and the Highways Authorities for additional access provided north to south through or along the edge of the site to link up bridleways 367/24/10 and 367/21/10 or to allow OCC to improve existing routes and to potentially secure additional routes for public access.

Biodiversity / Ecology

- 3.42 A consultation response from Nature Space commented in relation to Great Crested Newt (GCN) surveys, updated survey information is set out in an updated report. Best practice survey effort indicates that GCN are highly unlikely to be present within the Site and therefore no further surveys or licences would be required for the development to proceed. Monitoring during hedge clearance works will take place in accordance with best practice.
- 3.43 CDC Ecology (C Watkins) provided consultation comments relating to the date of bird surveys and bat activity surveys. Updated information is provided in the Environmental Assessment update that responds to this and to the comments of the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust.
- 3.44 CDC Ecology and The Wildlife Trust have also raised issues regarding: the Biodiversity Net Gian Calculations; impacts of the development of the Local Wildlife site, impacts of the development on the Stoke Bushes Ancient Woodland; loss of hedgerow; insufficient evidence on the impact on hairstreak butterflies and impact on the Tusmore and Shellswell Conservation Area Target.
- 3.45 Updated wintering bird surveys have been carried out over the winter of 2022-2023. The updated assessment has concluded that there is limited extent and/or quality of on-site habitats for wintering birds. The breeding bird surveys have not recorded any significant populations of birds breeding within the site.
- 3.46 With regards to net gain in biodiversity, the importance of ensuring a net gain in biodiversity has featured prominently in the design of the scheme layout. A revision of the biodiversity calculations is provided.
- 3.47 The Ecology Chapter of the Environmental Statement update in summary concludes:
 - The residual effects of the Proposed Development alone will be either negligible or beneficial. Thus, the likelihood of cumulative effects on ecological features arising in combination with the schemes listed above is judged to be negligible;
 - The majority of the Site comprises arable fields, with smaller areas of poor semi-improved grassland and scrub that are of negligible site level intrinsic ecological importance.
 However, the Site also includes species-poor and species-rich hedgerows and trees that are of Local ecological importance;
 - The Important Ecological Features taken forward for detailed assessment are set out below:



Stoke Bushes LWS (District-level);

Stoke Little Wood and Twelve Acre Copse Ancient Woodland / LWS (County Level)

Species-poor and species-rich hedgerow and trees (Local-level);

Birds (District-level);

Bats (Local-level);

Badger (Site-level);

Great crested newt (Site-level); and

Butterflies (Local-level).

- A range of industry standard measures describing key working methods and timings to avoid/minimise ecological effects during construction will be delivered and protected species licenses sought where required. These licenses would be obtained in advance of construction, and mitigation measures would be further refined and agreed during the licensing process;
- The design and layout of the Proposed Development has been refined through various iterations to ensure that potentially significant ecological effects are avoided or minimised, to attempt to deliver biodiversity gains in accordance with local and national planning policy. To achieve this, the Parameters Plan ensures that a minimum of 17.24ha, will be devoted to open space and managed for biodiversity purposes;
- Additional landscaping and open space will also be provided within the Developable Area
 once final site layouts are fixed at Reserved Matters Stage, further increasing the
 biodiversity potential of the proposals. The establishment, maintenance and long-term
 management of the retained and created habitats will be delivered via a LEMP.
- In summary, with appropriate mitigation and design built into the Proposed Development, no significant, adverse construction nor operational effects are predicted to the Important Ecological Features assessed. Furthermore, the Proposed Development can potentially deliver a long-term beneficial effect at a Local level with respect to hedgerow, scrub and tree habitats.
- 3.48 The design and layout of the Proposed Development has been refined through various iteration to ensure that potentially significant ecological effects are avoided or minimised, to attempt to deliver biodiversity gains in accordance with local and national planning policy. To achieve this, the Parameters Plan ensures that a minimum of 17.24ha, 20.70% of the site area, will be devoted to open space and managed for biodiversity purposes. Additional landscaping and open space will also be provided within the Developable Area once the final site layouts are fixed at reserved matters stage, further increasing the biodiversity potential of the proposals. The establishment, maintenance and long-term management of the retained and created habitat will be delivered via a LEMP.
- 3.49 Overall, based on the current landscaping plan, the Proposed Development cannot achieve a net gain for Habitat and Hedgerow Units within the Site. However, a new biodiversity gain can be delivered through inclusion of off-site measures that will be secured at the reserved matters stage, thereby meeting both local and national policy requirements.

Drainage

3.50 CDC, as the Land Drainage Authority, accepted the principles set out in the submitted Flood Risk Assessment (FRA) and Surface Water Management Plan, and noted that the superficial geology may be suitable for infiltration, which should be confirmed through BRE 365 testing. OCC, as Lead Local Flood Authority, requested specific additional information. The Environmental Assessment



update provides the requested details in the updated FRA. Based on the infiltration results it is proposed that all surface water runoff be discharged into soakaway basins/swales, where the surface water will be able to pass through the soil substrate, with the overflow discharging into an existing drainage ditch. Several basins will be utilised mainly on the eastern area of the north side of the development. The stored surface water will be discharged into an existing ditch by gravity.

Landscape and Visual Impact Assessment

- 3.51 Tim Screen, the Council's landscape officer concluded for the submitted planning application proposals that he supported the overall findings and the methodology of the Landscape and Visual Impact Assessment but recommended additional landscaping.
- 3.52 The landscape officer, concluded that he is unable to object due to the low sensitivity/high capacity of the landscape and the relatively low/medium visual amenity value of the site and that the localised influence of offsite features such as woodland, hedges and trees are of high value both in landscape and visual terms which should strongly influence the landscape masterplan.
- 3.53 An independent consultant has been instructed by the Council to review the amended Landscape and Visual Impact Assessment. In advance of this independent review, without prejudice discussions have been held with the Applicant and the consultants and additional Photo viewpoints (including wirelines) and illustrative views to show the development in winter months have been provided.
- 3.54 The Environmental Assessment update, which forms part of this submission, concludes: (paragraphs 9.9.1-9.9.7):

'An assessment of landscape and visual components of the Site and the wider area where there is the potential for likely significant environmental effects was undertaken through desktop and field study and in accordance with accepted guidance. This identified the main landscape and visual receptors likely to be affected by the Proposed Development and resulted in a baseline appraisal (contained at Technical Appendix 9.1) in the context of which landscape and visual effects could be assessed. The main landscape and visual implications of the Proposed Development and the potential impacts were identified, and mitigation developed in order to minimise these impacts.

The Landscape and Visual Impact Assessment considered the effects of the Proposed Development on the Wooded Estatelands Landscape Character Type, the Plateau Farmland Landscape Character Type and LCA 10a: Croughton, Aynho and Farthinghoe Plateau and finds that the Proposed Development results in limited impacts. The Proposed Development would not cause any significant residual effects on the overall character of this area.

The Site forms part of a transitional landscape between the major road corridors of the M40 and A43, and a more rural landscape to the east, including the village of Stoke Lyne.

The landscape within the study area is predominately flat to the north and gently undulating to the east, containing a mix of rural features and peri-urban uses, resulting in limited opportunities for views of the Site. In consideration of the impacts on the visual amenity of people, views towards the Site are often obscured by mature landscape features within a flat and gently undulating landscape. The assessment finds that, due to



this visual screening, there would be limited long-term impacts on publicly accessible areas, including highways and PRoW.

Significant residual impacts are predicted for receptors using ProW in close proximity to the Site, as well as residents in close proximity to it; and where the property may afford a view looking west as many are well contained by mature landscape features.

In the wider context, the low number of significant landscape and visual effects confirm the extent to which strategic planting incorporated into the Proposed Development would mitigate views, retaining and reinforcing the characteristic landscape fabric and pattern of the Site and assimilating the Proposed Development, as far as possible, into the periurban and rural landscape context.

The cumulative assessment identified that some in-combination views of the Proposed Development and the neighbouring commercial development site are predicted, predominantly where receptors are in close proximity to both the Proposed Development and the neighbouring commercial development site within the landscape to the north of the A43 and east of the M40. However, where the cumulative assessment identified effects that differ from that set out within the main Landscape and Visual Assessment, in all cases, these effects align with those set out within the LVIA submitted for the neighbouring commercial development site.'

Economic Development Officer

- 3.55 The economic development officer in their response to the application states that he is unaware of any local 'need' for such large-scale logistics units but acknowledges the regional and national 'demand' extending from the 'golden triangle' (around the A5, M6 and M1) into the A43 and M40 corridors.
- 3.56 A Market Analysis Report was prepared by Savills to support the outline planning application. This has been updated, to reflect the current market, as it was produced two years ago. No specific response/comments were received to the originally submitted report. The Savills report confirms that the current adopted Cherwell Local Plan 2011-2031 (Part 1) only partially accounts for the latest economic trends leading to higher demand for employment land in the logistics sector. The latest available evidence base from the Council is the Cherwell District Council's Economic Needs Assessment (ENA) (2021) and the Employment Land Review (2022) both prepared by Lambert Smith Hampton. The ENA estimates future need for employment land and finds that there is a need to create up to 47% more employment land for transport and storage than at present by 2040.
- 3.57 The Executive Summary of the Savills report concludes:

'In the light of our new work our overall conclusion remains the same as our previous market analysis in April 2022. There is a strong market needs case for permitting the Symmetry Park, Ardley scheme now, as well as the nearby Albion Land scheme. This location provides an exceptional opportunity to take account of the opportunity afforded by the M40 corridor to deliver a strategic logistics hub in the Cherwell District. The schemes are capable of accommodating units of a scale that cannot be met elsewhere in the District on allocated and review sites.



We estimate that in the wider property market area (PMA), which includes a number of neighbouring authorities to Cherwell, with these schemes coming forward supply of and demand for large logistics sites would broadly be in balance. We consider it appropriate to assess demand and supply at the wider PMA level as this is how the market views the area, and occupiers can choose to locate anywhere suitable in this area, independent of local authority boundaries.

In reality, large parts of the wider PMA are unsuitable for strategic logistics development, either being too distant from the Strategic Road Network, or subject to constraints and designations such as Green Belt and AONB. Given Cherwell's position and the attractive characteristics of these sites, the opportunity to capture the wider demand and the associated socio-economic benefits, business rates and job creation could be expressed in part in Cherwell including on these sites.

Our approach takes in to account our research which has found that allocated development sites typically take longer to deliver than timescales projected in local plans. We have assumed that 75% of the capacity of our assessed supply of allocations, permissions and the two schemes would come forward over a 10 year period. This is a conservative assumption given the actual outcomes in the case studies we have reviewed, and emphasises the importance of offering the market a choice of sites and flexibility to meet the needs of business (i.e. freehold and leasehold opportunities). Having a readily available land supply allows occupiers to make investment decisions with confidence (e.g. Siemens Healthineers example at J9 M40 taking unallocated land due to lack of allocated options).

Additionally, occupiers are also upgrading their stock in order to ensure they occupy energy efficient, net zero carbon buildings. Land supply should factor in these new requirements to help meet the UK's net zero goals.

Our appraisal is over a 10 year period and so is shorter than Cherwell's emerging local plan timeframe. We have focused on the short to medium term as this is where the most urgent need is for new development to meet the currently identified market need in a range of site options. Over the full timeframe of the emerging local plan there is likely to be the need to allocate further land for logistics to ensure market needs can be met, and for supply and demand to remain in balance.

Our average per annum core estimate of 630,000 sq.ft (15 ha) annual demand compares to figures estimated by LSH for Cherwell DC in their 2022 ELR of 420,000 sq.ft (9.8 ha).

We conclude that without allowing both Symmetry Park Ardley and Albion Land M40 J10 to come forward, there is not enough allocated land available and likely to come forward to meet anticipated demand over the next 10 years. If Symmetry Park, Ardley is permitted then the gap between supply and estimated demand is reduced substantially but still leaves insufficient capacity to meet estimated demand.

23

Policy Officer

3.58 The policy officer stated:



'This proposal in the rural area is not considered to be in accordance with Policy SLE1 unless it is determined that exceptional circumstances exist to support the development in the rural area and all of the criteria in SLE1 are met. Consultation should take place with the Council's Economic Development team to assist in determining if exceptional circumstances exist and the criteria are met'.

3.59 Policy SLE1 in the adopted Local Plan, is responsive to situations where economic development is not able to be accommodated on committed employment, and in consequence the release of an unallocated site may be justified.

3.60 SLE1 states:

'Unless exceptional circumstances are demonstrated, employment development in the rural areas should be located within or on the edge of those villages in Category A (see Policy Villages 1)'.

Therefore, the policy does envisage the possibility of exceptional circumstances requiring new employment land to be released.

- 3.61 The detailed site assessment, submitted with the planning application robustly establishes that this investment or need cannot be accommodated on any land committed for employment development, or within or on the edge of the Category A Villages. No urban land stands idle which might accommodate this scale of development.
- 3.62 The policy test is therefore for the Applicant to show exceptional circumstances to justify, in principle the need for new employment development on unallocated land. Therefore, set out below are the exceptional circumstances for accommodating this development, which are in short that this investment or need cannot be accommodated on any land committed for employment development, or within or on the edge of the Category A Village, no urban land stands idle which might accommodate this scale of development; the urgent need for more land to accommodate logistics floorspace; and the economic benefits of the scheme:

Need

1. The submitted planning application sets out the policy recognition of the need for logistics floorspace. The need argument is first demonstrated by reference to recent National, Regional and Local policy (for example as demonstrated in the NPPF, NPPG, Planning for Growth, UK Government Plan for Jobs, National Infrastructure Commission, the planning reforms for lorry parking, Oxfordshire Grown Needs Assessment, Local Industrial Strategy (OXLEP), Oxford-Cambridge Arc). There is a policy recognition of the need for logistics floorspace, with national policy in particular recognising the need for resilience of global supply chains due to the changed circumstances from Covid-19, the UK's changes in trade relationships, and the urgency of the need to promote jobs. There is an urgent need for more land for logistics in the interests of UK and regional growth policy.

The need argument is also demonstrated by the updated report prepared by Savills (as summarised above) which confirms that there is an increasing need for logistics and warehouse floorspace nationally, and along the M40 corridor specifically.



The Proposed Development will provide high quality logistics floorspace in a highly accessible location.

Through live enquiries and negotiations with prospective occupiers, and advice from the consultant team, there is knowledge of the local and regional market. The scheme is brought forward as a direct response to the strong market demand for logistics floorspace with rapid access to the strategic highway network.

Advanced discussions are being held with a number of occupiers about occupying a significant proportion of the floorspace proposed. A key component of the scheme is a development platform able to accommodate a large regional (or national) distribution centre, where economic activity has been particularly strong in recent years, as evidenced by the size and scale of current requirements in the market (as set out in Appendix 2 of the Savills Report (Active Market Requirements).

The substantial and growing need for logistics floorspace is a significant material consideration in the decision-making process.

The Proposed Development will provide high quality logistics floorspace in a highly accessible location adjacent to Junction 10 of the M40, importantly this junction also provides north and south bound vehicle access and is broadly equidistant from Birmingham and London, two key population and commercial centres in the UK. The proposals will address a significant need for logistics floorspace along the M40 motorway corridor. The Site benefits from fast road transport links to London, Birmingham and the M25 and is ideally placed to meet this growing need.

Economic and labour market considerations are also key drivers for the suitability of a site and location as a logistics hub, in addition to the transport links and connectivity the subject site benefits from. Without the Application Site, the supply imbalance will worsen and contribute to the already high levels of unsatisfied need in Cherwell and the wider region.

This unsatisfied need has been exacerbated by the Covid-19 pandemic and evolving consumer trends, and will continue given the limited development pipeline, which is not sufficient to satisfy the demand. Whilst the pandemic has certainly accelerated demand for more online shopping, there are many other longer-term factors driving a race for logistics floorspace from the growth of high-tech manufacturing to supply chain changes coming from our new trading relationships with the EU and the world. The Proposed Development will help address the need for high-quality logistics floorspace.

Economic Benefits

2. The Proposed Development will address a specific national, regional and local need for logistics floorspace and will help build a strong and competitive economy. The development will create a significant number of jobs across a wide range of skill sets. However, these benefits will only be realised if the substantial and growing need for logistics floorspace along the M40 corridor is addressed.

Development of the Application Site would help drive economic growth in and provide a source of new employment opportunities, as the Site has the benefits of an optimal



commercially attractive location, away from large areas of sensitive residential receptors but close to the motorway network and with a local labour supply.

No other Sites

- 3. The fact that there is no suitable allocated or committed sites available now that meet this investment requirement is in itself a crucial consideration in establishing 'exceptional circumstances'.
 - The phrase 'exceptional circumstances' should be given its ordinary meaning within the proper context, and means 'much greater than usual'. The development plan anticipated that employment development needs would ordinarily be met on allocated or committed sites but has acknowledged that 'exceptional circumstances' may exist justifying in principle the provision of employment on an unallocated site, i.e., the development plan envisages that sites may come forward on unallocated sites in rural areas.
- 3.63 The development would build on existing local economic strengths in the logistics sectors, making a readily deliverable, achievable and highly significant contribution to a strong and competitive regional economy, as already demonstrated by the success of the other logistics development within Cherwell.
- 3.64 A substantial planning need exists for major logistics development of the kind proposed in this application. The broad evidence of need for the type of employment land represented by the Application Site is material to the consideration of this application.
- 3.65 For the reasons set out above 'exceptional circumstances' have been demonstrated in compliance with Policy SLE1.

Parish Council's and Neighbourhood Groups

3.66 Also attached is a summary of representations received to date from Parish Council's and Neighbourhood Groups (including the Mid Cherwell Neighbourhood Plan Forum, albeit as acknowledged, noting that the site does not fall within its boundary) to the proposals and a response to the issues raised (Appendix 2).



4.0 CONCLUSIONS

- 4.1 Central to both local and national planning policy is the commitment to sustainable development. The NPPF includes three objectives in achieving sustainable development: the economic objective; the social objective; and the environmental objective. The Symmetry Park Ardley development proposals provide substantial benefits which are summarised below.
- 4.2 The following bullets summarises how the Proposed Development meets these objectives.

Economic Objective

- Capital Investment into the economy;
- Indirect investment in local construction companies;
- Operational: Net GVA generation of £148m to £182m per annum to Oxfordshire's economy, and
- The Proposed Development will generate business rates, which can be invested in local services and infrastructure.

Social Objective

- The construction of the Proposed Development is anticipated to create a net addition of 610 jobs;
- The operation of the Proposed Development is expected to create up to 2,430 2,990 jobs;
- Creation of a range of skilled and unskilled jobs;
- Open space provision; and
- Provision of cycle parking and showers to enable/encourage staff to cycle to work to assist in maintaining good levels of health of the workforce.

Environmental Objective

- Improved infrastructure to reduce the impact of trips generations, reduce the impact of traffic on the local highway, and reduce pollution;
- Improved cycle infrastructure: internal and provision of shared pedestrian/cycle path;
- Car and cycle parking that is consistent with Council standards and guidance;
- Operating a Travel Plan that will encourage residents to make use of more sustainable modes of transport when travelling to/from the Site;
- Ecology provision of a net gain in biodiversity. The parameters plan ensures that a minimum of 12.24ha (20,70 % of the site), will be devoted to open space and managed for biodiversity purposes;
- The Proposed Development is resilient to climate change, through for example use of SuDS and being built to high sustainability standards;
- Including SuDS will ensure that the Site will manage its surface water drainage in a sustainable manner, designed with additional capacity (40%) to ensure that the development will not increase the risk of flooding in the Site or surrounding area;
- Achieve a minimum EPC rating A;
- Be delivered to 'net zero carbon in construction' to accord with the UK Green Building Council's definition;

27

Achieve a rating of BREEAM 'Very Good' (as a minimum) upon completion;



- Incorporate substantial on-site renewable energy generation through solar PV coverage on the roof, and
- Provide Electric Vehicle charging points for staff and visitors.
- 4.3 The development management considerations contained within the Council's adopted Development Plan, including the aspirations for high-quality and sustainable design, have informed the Parameter Plan.
- 4.4 The amended proposal has positively responded to the issues raised curing consultation. The potential impacts of the Proposed Development on the local highway network, flood risk and drainage, biodiversity, designated Heritage Assets, trees, landscape and visual amenity, noise and air quality have all been further assessed and addressed as part of the amended application. The amended submission has responded positively to comments raised on the original submission.
- 4.5 It is demonstrated that the development would not have any adverse effects on the built or natural environment that cannot be minimised and mitigated to an acceptable level. In summary, the Proposed Development will provide high-quality logistics floorspace in a location that is highly accessible to the strategic road network.
- 4.6 The Proposed Development will help address an urgent and substantial need for logistics floorspace and is supported in principle by the National Planning Policy Framework. The development will create a range of substantial economic, social and environmental benefits and will contribute to various objectives of the Development Plan.
- 4.7 It has been demonstrated that the Proposed Development will not compromise the Council's employment strategy and the delivery of the employment strategic sites included in the development plan.
- 4.8 Paragraph 11 of the NPPF states that plans and decisions should apply a presumption in favour of sustainable development sites. For decision making this means that a proposal accords with an up-to-date development plan should be approved without delay.
- 4.9 Policy SLE1 is responsive to situations where economic development is not able to be accommodated on committed employment, and in consequence the release of an unallocated site may be justified. The detailed Site assessment robustly establishes that this investment or need cannot be accommodated on any land committed for employment development, or within or on the edge of the Category A Villages. No urban land stands idle which might accommodate this scale of development.
- 4.10 In these circumstances it is necessary to demonstrate exceptional circumstances (which have been demonstrated above) to justify releasing an unallocated site for new economic development and to demonstrate that the criteria of Policy SLE1 are satisfied. It is submitted that the policy tests of SLE1 have been fully satisfied, and that the proposals comply with other relevant polices from the Local Plan. The Proposed Development is considered to be compliant with the development plan read as a whole.
- 4.11 If the Council considers that this proposal is not compliant with provisions of a relevant policy, then an assessment has to be made as to the degree of any conflict and its significance when reading the Development Plan as a whole. Should there be policy conflict with the provisions of the Development Plan, it does not mean that an application has to be refused planning permission. The planning system is plan-led not plan determined. Material considerations such as



- the socio-economic benefits from this proposal would have to be weighed against the identified policy conflict. A decision then has to be made as to where in considering sustainable development, the overall public interest lies.
- 4.12 The Council would be entitled to make a decision in favour of this proposal even if the Proposed Development is considered to be in conflict with the development plan.
- 4.13 The Proposed Development is considered to accord with policies contained within the development plan specifically policy SLE1 which is most relevant to the Proposed Development. It will result in economic benefits within the surrounding area including increased spending and the creation of new jobs. On this basis it is felt that the proposals should be supported by officers and members alike.

APPENDIX 1



TOWN AND COUNTRY PLANNING ACT 1990

PLANNING STATEMENT

TO ACCOMPANY AN OUTLINE PLANNING APPLICATION FOR:

APPLICATION FOR OUTLINE PLANNING PERMISSION (ALL MATTERS RESERVED EXCEPT MEANS OF ACCESS (NOT INTERNAL ROADS) FROM B4100) FOR THE ERECTION OF BUILDINGS COMPRISING LOGISTICS (USE CLASS B8) AND ANCILLARY OFFICES (USE CLASS E(G)(I)) FLOORSPACE; ENERGY CENTRE, HGV PARKING, CONSTRUCTION OF NEW SITE ACCESS FROM THE B4100; CREATION OF INTERNAL ROADS AND ACCESS ROUTES; HARD AND SOFT LANDSCAPING; THE CONSTRUCTION OF PARKING AND SERVICING AREAS; SUBSTATIONS AND OTHER ASSOCIATED INFRASTRUCTURE.

APPLICANT:

TRITAX SYMMETRY ARDLEY LTD

APRIL 2022

PF/10679



CONTENTS

1.0 Introdu		ction	3
2.0	The Site	e and its Context	5
3.0	The Pro	pposed Development	9
4.0 Consul		ration	13
5.0	Planning Policy Context		
6.0 Plannir		g Considerations – Policy SLE1	26
7.0	Assessment of Proposals Against Other Development Plan Policy		48
8.0	Conclusion		57
TABLES	5		
TABLE 1		Assessment of Strategic Sites	35
TABLE 2		Assessment of Committed Sites	36
TABLE 3		Assessment of Category A Village Assessment	37
TABLE 4		How the Proposals Contribute to Sustainable Development	55
APPEN	DICES		
APPENDIX 1		Site Search Assessment	
APPENDIX 2		Category A Village Site Search	



1.0 INTRODUCTION

- 1.1 This planning statement has been prepared by Frampton Town Planning Ltd on behalf of Tritax Symmetry Ardley Ltd (the Applicant) in support of an outline planning Application, land known as Symmetry Park, Ardley. The extent of the site is edged red on the submitted Location Plan.
- 1.2 The description of development is as follows:

'Application for outline planning permission (all matters reserved except means of access (not internal roads) from B4100) for the erection of buildings comprising logistics (Use Class B8) and ancillary offices (Use Class E(g)(i)) floorspace; Energy Centre, HGV parking, construction of new site access from the B4100; creation of internal roads and access routes; hard and soft landscaping; the construction of parking and servicing areas; substations and other associated infrastructure.'

- 1.3 The planning Application is accompanied by the following plans, drawings and reports:
 - Location Plan ref: 14-019-SGP-xx-xx-DR-A-131001 Rev P2
 - Parameters Plan ref: 14-019-SGP-xx-xx-DR-A-111003 Rev P1
 - Illustrative Masterplan ref: 14-019-SG1-xx-xx-DR-A-001010 Rev P2
 - Access Plan ref: 2162851PD01 Rev B
 - Environmental Statement:
 - Volume 1
 - Volume 2
 - Non Technical Summary
 - Health Impact Assessment
 - Planning Statement
 - Market Analysis
 - Labour Market Assessment
 - Design and Access Statement
 - Agricultural Quality of Land
 - Sustainability Statement
 - Waste Management Strategy
 - Framework Construction Environmental Management Plan
 - Statement of Community Involvement
 - Framework Travel Plan
 - Illustrative Drainage Drawings (refs. T-21-2503-55-01-Drainage Layout-Sheet 1-P6; T-21-2503-55-02-Drainage Layout-Sheet 2-P5; T-21-2503-55-03-Drainage Layout-Sheet 3-P5; T-21-2503-55-04- Flood Exceedance Route Sheet 1-P2; T-21-2503-55-05- Flood Exceedance Route Sheet 2-P2; and T-21-2503-55-06- Flood Exceedance Route Sheet 3-P2)

Topographical Survey (refs. HC140910 (Sheets 1-4); 21339 21 TOPOGRAPHICAL R2-A0 North_ Plan; 21339 21 TOPOGRAPHICAL R2-A0 N-S _Plan; 21339 21 TOPOGRAPHICAL R2-A0 South_ Plan)

1.4 The purpose of this planning statement, as an overarching document, is to explain the planning background of the proposals for the Local Planning Authority (LPA) and the local community, and to consider the national and local planning policy framework within which the Application has been assessed.



Environmental Statement

- 1.5 The planning Application is accompanied by an Environmental Statement (ES). The Proposed Development falls within Schedule 2 of the EIA Regulations, being development likely to have significant effects on the environment by virtue of factors such as its nature, size or location under the category of 'Industrial estate development projects' (Schedule 2, 10 a).
- 1.6 An EIA scoping opinion has not been requested from Cherwell District Council. The scope of the assessment has been established using the experience of the Applicant and EIA team, based on other similar proposals in the District and elsewhere. In addition to published guidance, information available from the planning consultation responses received by CDC for planning applications currently under consideration for Land at Junction 10, M40 CDC Planning References 21/03267/OUT, 21/03268/OUT and 21/03266/F has provided additional context in relation to Proposed Development in the locality and used to inform the assessments. The following topics that may have a significant environmental impact have been 'scoped into' the ES:
 - Transport (Consultant Vectos);
 - Air quality (Consultant SLR);
 - Noise (Consultant SLR);
 - Biodiversity (Consultant EDP);
 - Landscape and Visual Effects (including Lighting) (Consultant EDP);
 - Heritage (Consultant EDP);
 - Hydrology, Flood Risk and Drainage (Consultant Tier);
 - Ground Conditions and Soils (Consultant Tier);
 - Climate Change (Consultant Ridge); and
 - Socio-Economic Effects (Consultant Savills).
- 1.7 The following topics are likely not to give rise to a significant environmental impact and are scoped out:
 - Human Health;
 - Accidents and Disasters;
 - Waste; and
 - Agriculture.
- 1.8 The ES considers the cumulative effects of the Proposed Development; effects that relate to multiple developments that may give rise to significant effects at a receptor identified in each topic chapter; and effects arising from the combination of the different environmental topics as outlined within the ES.



2.0 THE SITE AND ITS CONTEXT

- 2.1 The Site comprises two parcels, including highways land, the total Site area is 83.279 ha, as shown on the plan below.
- The Site is located adjacent to the A43, accessed from the B4100, with direct access to the M40 at Junction 10. The M40 provides access to Bicester and then to London to the southeast and Birmingham to the north-west.
- 2.3 The Site is located in an area which is dominated by agricultural land, with sparsely located residential and commercial development. The surrounding landscape is generally low-lying agricultural land.
- 2.4 The nearest settlement is Stoke Lyne, approximately 800m east of the Site. Ardley/Fewcott is located about 1.2km south-west and Fritwell is located circa 2km to the west, both of which are beyond the M40.
- 2.5 The Moto Cherwell Valley motorway services and the Travelodge Bicester Cherwell Valley are located within 100m of the southern boundary of the southern Site, and an Esso service station (Baynards Green Service Station) is located approximately 50m west of the northern Site's western boundary on the A43/B4100 roundabout junction. Baynards Green Farm, to the west, now converted to a commercial estate, is located immediately beyond the Esso service station; this contains a Grade II listed barn.
- 2.6 The southern parcel of the Site is located to the south of the B4100. The southern parcel is the smaller piece of land.
- 2.7 The southern parcel is bound by the B4100 (a single carriageway road) to the north, agricultural land to the west (which is currently subject to a number of planning Applications: (Refs 21/03266/F, 21/03267/OUT and 21/03268/OUT, please see below for further details). Vehicular and pedestrian access is currently gained via the B4100 on the northern Site boundary. The B4100 connects to the A43 at a roundabout adjacent to the south eastern corner of the northern parcel's Site boundary.
- 2.8 To the east is agricultural land. To the south is agricultural land and a wooded area beyond which is the Moto Cherwell service station and Travelodge.
- 2.9 The southern parcel Site comprises an agricultural field which is defined by field boundaries and hedgerows. An agricultural land quality Site survey has found the agricultural land to be moderate quality (Grade 3b), which is not categorised as the best and most versatile.
- 2.10 The Environment Agency's flood map indicates that the southern parcel is located within Flood Zone 1. It therefore has a 'low probability' of river flooding, with less than a 1 in 1,000 annual probability (<0.1%).
- 2.11 There is a bridleway (ref. 367/21/10) which runs close to the south west boundary of the Site.

 The path is on the adjoining land to the south of the site.
- 2.12 For the southern part of the Site, there are no designated Heritage Assets (World Heritage Sites, Scheduled Monuments, Listed Buildings, Conservation Areas, Registered Parks and Gardens or Registered Battlefields) located within the Site. There are no World Heritage Sites, Scheduled Monuments, Registered Parks and Gardens or Registered Battlefields within the Site or within 500m of the Site boundary.



- 2.13 The southern part of the Site is not located near to a 'sensitive area' (as defined in Part 1 of the EIA Regulations) (i.e., a Site of Special Scientific Interest (SSSI), National Park, Area of Outstanding Natural Beauty (AONB), World Heritage Site (WHS), Scheduled Monument or European Site and is not subject to any statutory or non-statutory designations for nature conservation or heritage.
- 2.14 The northern parcel, the larger Site, is bounded by the B4100 to the south and the A43 dual carriageway. Beyond the A43 there is a fast-food takeaway and service station, a small business park, and agricultural land. To the north is a gated single carriageway road beyond which there is agricultural land, crossed by footpaths and bridleways. To the east is a single carriage road, beyond which is agricultural land and a farm (Lone Barn).
- 2.15 To the south west corner of the northern Site is the A43 and B4100 Baynards Green roundabout.
- 2.16 Vehicular and pedestrian access is currently gained via the B4100 on the southern Site boundary. A field access also exists to the north east corner of the site.
- 2.17 The northern Site comprises agricultural fields which are defined by field boundaries and hedgerows. An agricultural land quality Site survey has found the agricultural land to be moderate quality (Grade 3b), which is not categorised as the best and most versatile.
- 2.18 For the northern Site, the Environment Agency's flood map indicates that the southern parcel is located within Flood Zone 1. It therefore has a 'low probability' of river flooding, with less than a 1 in 1,000 annual probability (<0.1%).
- 2.19 There is a bridleway (ref. 367/24/10) off Site, which runs parallel (on adjoining land) along the northern boundary of the Site.
- 2.20 The Site itself is generally flat with levels falling gently to the east.
- 2.21 The northern parcel is not located within or near to a 'sensitive area' (as defined in Part 1 of the EIA Regulations) (i.e., a Site of Special Scientific Interest (SSSI), National Park, Area of Outstanding Natural Beauty (AONB), World Heritage Site (WHS), Scheduled Monument or European Site and is not subject to any statutory or non-statutory designations for nature conservation or heritage. There are no World Heritage Sites, Scheduled Monuments, Registered Parks and Gardens or Registered Battlefields within the Site or within 500m of the Site boundary.

Planning History

- 2.22 There is no relevant planning history for the Site. The Site is currently and historically has been in agricultural use. No previous development or other uses are known to have occurred on the Site.
- 2.23 Three Planning Applications have been submitted by Albion Land on sites which are immediately adjacent to the Application Site (to the south of the northern parcel and to the west of the southern parcel). The Applications have not yet been determined by the Council. The Applications comprise:
 - a) Site clearance, construction of new site access from the B4100, permanent and temporary internal roads, an internal roundabout and a foul drainage station,



- diversion of an existing overhead power cable and public right of way, and soft landscaping (Application ref. 21/03266/F).
- b) Outline planning permission (all matters reserved except for access) for the erection of buildings comprising logistics (Use Class B8) and ancillary Office (Use Class E(g)(i)) floorspace and associated infrastructure; construction of new site access from the B4100; creation of internal roads and access routes; and hard and soft landscaping (Application ref. 21/03267/OUT (Eastern Parcel)).
- c) Outline planning permission (all matters reserved except for access) for the erection of buildings comprising logistics (Use Class B8) and ancillary Office (Use Class E(g)(i)) floorspace; construction of new site access from the B4100; creation of internal roads and access routes; hard and soft landscaping including noise attenuation measures; and other associated infrastructure (Application ref. 21/03268/OUT (Western Parcel)).
- Another Planning Application of note in the area includes at Heyford Park, a hybrid planning Application for the mixed-use development of the 'Heyford Park' site was approved subject to the completion of a Section 106 Agreement in November 2020. The approved development comprises the construction of up to 1,175 new residential dwellings and a range of other uses, including new employment buildings, (comprising up to 6,330 sq m Class B1a, 13,635 sq m B1b/c, 9,250 sq m Class B2, and 5,960 sqm B8. Off-site mitigation to be secured as part of the Section 106 Agreement include 'M40 Junction 10 improvements' as well as improvements to the A43 Baynards roundabout (which will include the amendments and extension of the existing roundabout to the west, upgrade of the A43 in both directions and minor capacity improvements for local approaches) (Application ref. 18/00825/HYBRID).
- 2.25 Planning permission (Application Ref. 19/02550/F) was granted at appeal in May 2021 for the 'redevelopment of part of golf course to provide new leisure resort (sui generis) incorporating waterpark, family entertainment centre, hotel, conferencing facilities and restaurants with associated access, parking and landscaping.' at land to the east of M40 and south of A4095, Chesterton, Bicester (Great Wolf).
- 2.26 A request for a Scoping Opinion for the Oxfordshire Strategic Rail Freight Interchange Development Consent Order was submitted in June 2021. The Proposed Development comprises a Strategic Rail Freight Interchange (SRFI) together with associated development on land south of the Chiltern Railway line, and west of the B430, east of Upper Heyford Former Airfield. The rail freight facility is expected to include a new rail terminal, large warehouses (providing a maximum of 675,000 sq.m of floorspace), a management building, rail reception sidings, container storage area and associated container transfer equipment and a refuelling facility. The development will also include a range of highway works including improvements at Junction 10 of the M40. Several options for these highways improvements are currently being considered. A Scoping Opinion was formally issued on behalf of the Secretary of State in July 2021 (Case ref. TR050008).

Highway Improvements

- 2.27 The Oxfordshire Growth Board (OGB) have allocated funding to increase the capacity of the A43/B4100 Baynards Green roundabout.
- 2.28 Developments to the Baynards Green Roundabout will be closely associated with developments at Junction 10 of the M40. These developments will aim to increase network capacity, improve road safety at junctions and reduce journey times.



2.29 The upgrades of the junction will involve the signalisation of the roundabout, an additional lane on the northern arms and additional road markings. This will support the ongoing housing development taking place the former RAF base at the Upper Heyford site (Heyford Park). National Highways are planning to complete the design by August 2022 and start construction by November 2022, with delivery in 2023.

PF/10679



3.0 THE PROPOSED DEVELOPMENT

Proposals Summary

- 3.1 The proposals seek outline planning permission (all matters reserved except means of access) for the erection of buildings comprising logistics (Use Class B8) and ancillary office (Use Class E(g)(i)) floorspace and the construction of associated parking, servicing, hard and soft landscaping and a new access from the B4100.
- 3.2 Illustrative details of layout, scale, landscaping and appearance are submitted in illustrative form only and are reserved for future approval. These details will be submitted for approval via future reserved matters Applications. The illustrative masterplan has been submitted for information to demonstrate one way in which the proposed parameters could be interpreted.
- 3.3 The submission includes access to the Site which is shown as a new roundabout located on the B4100 providing access to both parcels.

Floorspace and land use

- 3.4 The outline Application seeks approval for up to 300,000 sqm GEA of floorspace (as set out in the parameters plan). The quantum of logistics and ancillary office floorspace will not exceed the proposed maximum permitted floorspace figures set out in the parameters plan.
- 3.5 The parameters plan is submitted for approval and sets the parameters for the scale, layout and landscape enhancement within the Site. The parameters plan establishes the 'developable areas' within the Sites and the maximum building heights. The parameters plan provides a level of flexibility for the detailed design at a later date, which will need to be approved by the Council through subsequent reserved matters Applications.

Energy Centre and Photovoltaics (PVs)

- 3.6 The parameters plan allows for the provision of an Energy Centre as part of the on-site infrastructure, to potentially provide power and heat to businesses on the park. This delivers resilient and low carbon power, meeting occupier needs now and in the future.
- 3.7 The Energy Centre will combine multiple power sources to enhance grid supplies. Electricity from the Energy Centre will contribute to the needs of the users of the Site, and the heat will be captured in the form of hot water which in turn will be distributed over a heat network and utilised across the Site.
- 3.8 Rooftop solar PV generation will be built, with surplus generation potentially being stored in Energy Centre batteries. Any shortfall in supply will be made up using local embedded combined heat and power/fuel cell mix units in the Energy Centre.
- 3.9 The whole of the useable roof area is constructed to accept PV panels, however the percentage of roof coverage of PVs will depend on the final operator's energy usage. The initial base build PV coverage is generally sufficient to power the building. Occupiers can then add further PV panels to meet their specific needs. This helps to avoid manufacture of redundant units and allows the most efficient units available to be used when required.



HGV Parking (Lorry Parking)

3.10 The parameters plan allows for the provision of HGV parking, a separate dedicated area for lorry parking. This responds to the Government's recent reforms for lorry parking which emphasises the critical importance of the freight and logistics sector to shops, households, assembly lines and other public services across the country.

Jobs

- 3.11 The construction of the Proposed Development is anticipated to deliver 500 on-site jobs per annum during the construction period. Once leakage, displacement, and multiplier effects are considered, it is anticipated there will be a net addition of 610 jobs.
- 3.12 The operation of the Proposed Development is expected to deliver up to 2,430 on-site jobs per annum during its lifetime.

Access

- 3.13 Access to the Site is proposed via the creation of a new roundabout on the B4100.
- 3.14 As part of the development proposals, a new bus stop/layby will be provided to improve accessibility by public transport for future employees and visitors of the Site.
- 3.15 The proposals will include HGV, staff and visitor car parking areas (including disabled car parking spaces, Electric Vehicle (EV) charging point spaces and car share spaces), motorcycle parking spaces and cycle spaces.

Ecology

- 3.16 The Proposed Development will achieve a net biodiversity gain on Site. An illustrative landscape design is provided as part of the Planning Application, this is designed to include new habitats of ecological value within the open space and other green and blue infrastructure, including SuDS.
- 3.17 The illustrative landscape scheme proposes the following features:
 - Existing boundary hedgerows and trees would be retained and reinforced to offer commuting and foraging opportunities for protected species;
 - Additional native hedgerows to be created with the Site;
 - Landscaped buffer from Proposed Development zones to enhance boundary features of ecological interest;
 - Native heavy standard tree planting and shrubs;
 - New native woodland planting;
 - New species-rich meadow grassland;
 - Additional structural landscaping to provide a connection between existing woodland blocks within the local landscape context;
 - Species-rich meadow grassland to be created within areas of green open space to provide nectar-rich habitats for pollinating insects such as bees, butterflies and moths, and
 - New wetland habitat.



Landscape

- 3.18 A Landscape and Visual Impact Assessment (LVIA) accompanies the planning Application. The findings of the LVIA informed the Site layout and the Landscape Strategy. The Landscape Strategy involves the following:
 - Existing boundary hedgerows and trees would be retained where possible (with buffers to the Proposed Development), reinforced and brought into regular, longterm management. This would protect visual amenity and landscape character as well as continuing to offer commuting and foraging opportunities for protected species;
 - Creation of a landscaped buffer from Proposed Development zones to protect and enhance retained boundary features of landscape and ecological interest, including a bunded landscape buffer to the east of the Site (a minimum of 30 metres in depth);
 - Provision of structural landscaping, native trees and shrubs that reflect the local context throughout the scheme to maintain a buffer to the wider setting. Particularly within the eastern areas of the Site, existing landscape features would be reinforced with additional planting measures in order to maintain the 'green' setting to the wider rural setting;
 - Provision of landscape screening, in the form of landscaped bunds and native tree planting, to properties and PRoW in close proximity to the Site;
 - Native heavy standard tree planting is proposed within landscape buffers to fragment views of the Proposed Development, particularly for receptors in relatively close proximity to the east of the Site;
 - Additional structural landscaping proposed to the eastern boundary would provide
 a new landscape corridor that would provide a connection between existing
 woodland blocks within the local landscape context;
 - The proposals should complement the existing landscape features of the Site and character of adjacent uses and rural areas, and
 - The Landscape Strategy takes into consideration the long-term vision for the Site, using tree planting to filter into the Proposed Development from adjacent green corridors and to frame and buffer the proposed built form.

Sustainable Urban Drainage

3.19 The drainage of the Site will be managed by a Sustainable Urban Drainage System (SuDS). The SuDS will incorporate swales and SuDS ponds, to ensure that the 1 in 100 year plus 40% climate change storm event can be contained on Site. The run-off rate will not exceed the existing greenfield run-off rate.

Sustainability Elements

- 3.20 The following sustainable features are embedded within the design, further details are contained in the Sustainability Statement accompanying this Application
 - Plant will achieve a minimum EPC rating A;
 - Buildings will be delivered to 'net zero carbon in construction' to accord with the UK Green Building Council's definition;
 - The development will achieve a minimum rating of BREEAM Very Good upon the completion of the development;



- Incorporate substantial on-site renewable energy generation through solar PV coverage on the roofs and the Energy Centre;
- The proposals will provide on-site cycle storage and shower facilities to encourage employees to cycle to the Site; and
- The proposals will provide EV charging points for staff and visitors.



4.0 CONSULTATION

- 4.1 In light of the COVID-19 pandemic, the Applicant considered the most appropriate manner in which to engage with the local community, the public engagement strategy therefore included a virtual exhibition. The consultation material was uploaded onto Frampton Town Planning's website to allow online access for the community.
- 4.2 Invitations were sent to members of the Parish Councils below, for a virtual presentation:
 - Stoke Lyne Parish Council
 - Ardley and Fewcott Parish Council
- 4.3 The following local Ward Councillors (Fringford and Heyfords Ward) were also sent invitations for a virtual presentation. No responses were received from the Parish Council or Ward Councillors.
- 4.4 A Statement of Community Involvement is submitted as part of the planning Application. This summarises responses received to the consultation and the Applicant's response to the comments raised. In summary, the comments raised related to:
 - Traffic Impact;
 - Impacts on Noise and Air Quality;
 - The need for the Development;
 - Design and Scale of Development (including visual impact);
 - Loss of Agricultural Land;
 - Loss of Wildlife Habitats;
 - Flood Risk, and
 - Water and Electricity Supply and Sewage Capacity.
- 4.5 The planning Application is supported by an Environmental Impact Assessment (EIA). The preparation of the EIA has included consultation with, among others, Oxfordshire County Council Transport and Archaeology officers, Cherwell's Heritage officer and Historic England.
- 4.6 Furthermore, the team has reviewed consultation responses (and neighbour responses) to the Application on the adjoining sites (application references: 21/03267/OUT; 21/03268/OUT; and 21/03266/F. These have been taken into account in the formulation of the planning Application, including responses from: the Environment Agency; Historic England; National Highways; the Council's Economic Growth officer; Mid Cherwell Neighbourhood Plan Forum (albeit the Site sits outside of this area); Oxfordshire County Council (Archaeology, Transport and Local Lead Flood Authority); Fire Service, Anglian Water, Cherwell District Council Land Drainage Officers, Cherwell District Council Environmental Health Officer, Building Control and the Wildlife Trust.



5.0 PLANNING POLICY CONTEXT

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 (as amended) requires the determination of Planning Applications to be made in accordance with the development plan unless material considerations indicate otherwise.
- 5.2 The Development Plan comprises the:
 - Adopted Cherwell Local Plan 2011-2031 (Part 1);
 - 'Saved' policies Local Plan 1996 (November 1996);
 - Cherwell Local Plan 2011-2031 (Part 1) Partial Review Oxford's Unmet Housing Need September 2020, and
 - Oxfordshire Minerals and Waste Plan (Part 1- Core Strategy) September 2017.
- 5.3 The relevant planning policies of Cherwell District Council's (CDC) development plan are set out below:

Adopted Cherwell Local Plan 2011-2031 (Part 1) (CLP)

- Policy ESD1 Mitigating and Adapting to Climate Change
- Policy ESD2 Energy Hierarchy and Allowable Solutions
- Policy ESD3 Sustainable Construction
- Policy ESD4 Decentralised Energy Systems
- Policy ESD6 Sustainable Flood Risk Management
- Policy ESD7 Sustainable Drainage Systems
- Policy ESD10 Biodiversity and the Natural Environment
- Policy ESD11 Conservation Area Targets
- Policy ESD13 Local Landscape Protection and Enhancement
- Policy ESD15 Character of the Built Environment
- Policy ESD17 Green Infrastructure
- Policy INF1 Infrastructure
- Policy PSD1 Presumption in Favour of Sustainable Development
- Policy SLE1 Employment Development

'Saved' policies from the adopted Local Plan 1996 (November 1996) (LP)

- Policy C8 Sporadic Development in the Countryside
- Policy C28 Layout, Design, and External Appearance of New Development
- Policy ENV1 Development Likely to Cause Detrimental Levels of Pollution
- Policy TR1 Transportation
- Policy TR10 Heavy Goods Vehicles
- 5.4 There are no planning policies in the Cherwell Local Plan Review (Part 2) or the Minerals and Waste Plan relevant to this Planning Application.

The Cherwell Local Plan (CLP)

5.5 Development plans contain broad statements of policy, many of which may be mutually unreconcilable. It is hence important when considering the merits of a particular Planning Application to establish whether there is 'dominant' policy whose provisions are most relevant to the proposals. Policy SLE1 'Employment Development' is the most relevant policy consideration.



- 5.6 Policy SLE1 comprises two parts, namely;
 - (i) the protection of existing employment sites and the focus of employment development within the built-up areas of Bicester, Banbury and Kidlington and on strategic allocations included within the CLP; and
 - (ii) the circumstances where 'new employment proposals' on non-allocated rural sites will be supported.
- 5.7 As the Application Site is not allocated in the CLP and is located within the countryside, the Proposed Development falls within the second part of the policy. Fundamental to the support for employment developments on non-allocated rural sites are the following:
 - (i) The need to demonstrate 'exceptional circumstances';
 - (ii) The requirement to demonstrate through a robust site assessment that the Proposed Development cannot be accommodated on land:
 - Committed for employment development;
 - Allocated for employment development, and
 - Within or adjoining Category A Villages.
- 5.8 Thereafter Policy SLE1 sets out criteria for assessing employment proposals on unallocated sites in the rural area, as follows:
 - 'They will be outside the Green Belt, unless very special circumstances can be demonstrated; (Bullet Point 1)';
 - Sufficient justification is provided to demonstrate why the development should be allocated in the rural area on a non-allocated site; (Bullet Point 2);
 - They will be designed to a very high-quality standards using sustainable construction, and be of an appropriate scale and respect the character of the villages and the surroundings; (Bullet Point 3);
 - They will be small scale unless it can be demonstrated that there will be no significant adverse impact on the character of a village or surrounding environment. (Bullet Point 4);
 - The proposal and any associated employment activities can be carried out without undue detriment to residential amenity, the highway network, village character and its setting, the appearance and character of the landscape and the environment generally including on any designated buildings or features (or on non-designated buildings) or features of local importance; (Bullet Point 5);
 - The proposal will not give rise to excessive or inappropriate traffic and will wherever possible contribute to the general aim of reducing the need to travel by car; (Bullet Point 6), ad
 - There are no suitable available plots or premises within existing nearby employment sites in the rural area. (Bullet Point 7).
- 5.9 Policy SD1 sets out a presumption in favour of Sustainable Development.
- 5.10 Policy SLE 4 requires all development (where reasonable to do so) to facilitate the use of sustainable transport. The policy encourages solutions which support reductions in greenhouse gas emissions and reduce congestion. Proposals will be required to mitigate the transport impacts of development. Development not suitable for the roads that serve it and which have a severe traffic impact will not be supported.



- 5.11 Policy ESD 1 states that growth will be distributed to the most sustainable locations as defined in the Local Plan. Development that seeks to reduce the need for travel and encourages sustainable travel options will be delivered. Developments will be designed to reduce carbon emissions and use resources more efficiently. The use of decentralised and renewable or low carbon energy will be promoted. Suitable adaptation measures will be incorporated within the development to ensure it is resilient to climate change. This will include consideration of known physical and environmental constraints; demonstration of design approaches that are resilient to climate change impacts; minimising the risk of flooding and using sustainable drainage methods; and reducing the effects of development on the microclimate.
- 5.12 Policy ESD2 states that the Council will promote the following energy hierarchy:
 - Reducing energy (in particular by the use of sustainable design and construction measures);
 - Supplying energy efficiently and prioritising decentralised energy supply;
 - Making use of renewable energy, and
 - Making use of allowable solutions.
- 5.13 Policy ESD 3 requires all new non-residential development to meet at least BREEAM Very Good with immediate effect. All development will be encouraged to reflect high quality design and high environmental standards, demonstrating sustainable construction methods.
- 5.14 Policy ESD 4 requires the use of decentralised energy systems in all new developments. A feasibility assessment for District heating or combined heat and power is required for all nondomestic development involving more than 1,000 sq.m floorspace. Where this demonstrates that decentralised energy systems are deliverable and viable, such systems will be required as part of the development unless an alternative solution would deliver the same or increased benefit.
- 5.15 Policy ESD 6 promotes the sequential approach to development for flood risk. Development should be safe, manage surface water effectively on site and not increase flood risk elsewhere.
- 5.16 Policy ESD 7 requires all development to use sustainable drainage systems.
- 5.17 Policy ESD 10 states that a net gain in biodiversity will be sought by protecting, managing, enhancing and extending existing resources and by creating new resources. If significant harm resulting from a development cannot be avoided, adequately mitigated or compensated, then development will not be permitted. Development proposals are expected to incorporate features to encourage biodiversity and retain, and where possible, enhance existing features of nature conservation value within the site.
- 5.18 Development is also expected to respect and enhance local landscape character (Policy ESD 13). Where damage to local landscape character cannot be avoided appropriate mitigation will be secured. Proposals that cause undue visual intrusion into the open countryside, undue harm to important natural landscape features and topography, are inconsistent with local character, and impact on areas of a high level of tranquillity, will not be permitted.
 - 5.19 Policy ESD 15 states that new development is expected to complement and enhance the character of its context through sensitive siting, layout and high-quality design. All development is required to meet high design standards. New development proposals should:



- Be designed to deliver high quality, safe, attractive, durable and healthy places to live and work in;
- Be adaptable to changing social, technological, economic and environmental conditions;
- Support the efficient use of land and infrastructure;
- Contribute positively to an area's character and identity by creating or reinforcing local distinctiveness and respecting local topography and landscape features;
- Consider the amenity of both existing and future development;
- Limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation;
- Incorporate energy efficient design and sustainable construction techniques, and
- Integrate and enhance green infrastructure and incorporate biodiversity enhancement features where possible.
- 5.20 Policy ESD 17 requires development to maintain and enhance the District's green infrastructure.
- 5.21 Policy INF 1 states that development proposals will be required to demonstrate that infrastructure requirements can be met.
 - Saved Policies of the Adopted Cherwell Local Plan 1996
- 5.22 Saved Policy TR1 requires the Council to be satisfied that new highway improvement works and other transport measures needed as a result of development will be provided.
- 5.23 Saved policies C8 states that sporadic development in the open countryside, including developments in the vicinity of motorway or major road junctions, will generally be resisted.
- 5.24 Saved Policy C28 requires development to demonstrate high standards of layout, design and external appearance.
- 5.25 Saved Policy TR10 states that development that would generate frequent heavy goods vehicle movements will not be permitted if they would create traffic problems or adversely affect the amenity of residential areas or villages.

Other Material Considerations

- 5.26 Other material considerations include:
 - National Planning Policy Framework;
 - National Planning Practice Guidance;
 - National Design Guide;
 - The HM Treasury Budget 2021 'Protecting the Livelihoods of the British People';
 - The HM Treasury's 'Build Back Better Our Plan for Growth' 3 March 2021;
 - The UK Government's 'Plan for Jobs';
 - The National Infrastructure Commission;
 - Written Statement to Parliament 'Planning Reforms for Lorry Parking';
 - Oxford Cambridge Arc;
 - Local Industrial Strategy OXLEP (August 2020), and
 - Emerging Development Plan Policy.



- National Planning Policy Framework 'The Framework'
- 5.27 The National Planning Policy Framework (NPPF) (2021) sets out the Government's planning policies for England and how they should be applied.
- 5.28 Paragraph 7 of the NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 explains that there are three objectives associated with sustainable development; economic, social and environmental. These three objectives are 'interdependent' and to be pursued in 'mutually supportive ways.'
- 5.29 Paragraph 8 of the NPPF states that to ensure that the economic objective of sustainable development is achieved and to build a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth, innovation and improve productivity.
- 5.30 Paragraph 10 of The NPPF introduces the presumption in favour of sustainable development. For decision making this means:
 - 'c) Approving development proposals that accord with an up-to-date development plan without delay; or
 - d) Where there are no relevant development plan policies, or the policies which are most important for determining the Application are out-of-date, granting permissions unless:
 - The Application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the Proposed Development; or
 - ii) Any adverse impacts of doing so would significantly outweigh the benefits, when assessed against the policies in this Framework taken as a whole.'
- 5.31 Paragraph 11 explains that this means approving proposals, without delay, that accord with the Development Plan.
- 5.32 The following sections of the NPPF contain policy guidance that is relevant to this proposal.
 - Section 6: Building a strong, competitive economy;
 - Section 9: Promoting sustainable transport;
 - Section 12: Achieving well-designed places;
 - Section 14: Meeting the challenge of climate change, flooding and coastal change;
 - Section 15: Conserving and enhancing the natural environment; and
 - Section 16: Conserving and enhancing the historic environment.
- 5.33 Paragraph 38 requires Local Planning Authorities (LPAs) to approach decisions on Proposed Development in a positive and creative way. Decision makers should seek to approve Applications for sustainable development where possible.
- 5.34 Paragraph 55 explains that LPAs should consider whether otherwise unacceptable development could be made acceptable through the use of conditions or planning obligations.
- Paragraphs 81, 82 and 83 (Section 6, Building a strong, competitive economy) are significant paragraphs in the determination of this Planning Application. Paragraph 81 states that 'Planning policies and decisions should help create the conditions in which business can invest, expand and adapt' and further states that 'Significant weight should be placed on the need



to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.' [Emphasis added]

- 5.36 Paragraphs 82 states that local planning policies are required to:
 - Set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth;
 - Set criteria, or identify strategic sites, for local and inward investment;
 - Seek to address potential barriers to investment, such as inadequate infrastructure, services, or housing, and
 - Be flexible enough to accommodate needs not anticipated in the plan.
- 5.37 Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for storage and distribution operations at a variety of scales and in suitably accessible locations (paragraph 83).
- 5.38 Section 6 (paragraph 84) states that planning policies and decisions should enable the sustainable growth and expansions of all types of business in rural areas, including through well-designed new buildings.
 - National Planning Practice Guidance (NPPG)
- 5.39 The NPPG is online based government guidance. The NPPG provides supplementary and supporting context for the NPPF and should therefore be read in conjunction with the NPPF.
- 5.40 The NPPG provides general procedural guidance on matters including the use of planning conditions and obligations as well as on planning appeals. The document provides guidance on issues of prejudice and prematurity alongside providing detailed technical guidance for both authorities and Applicants on the production of planning studies, such as housing and economic land availability assessments.
- 5.41 A fundamental provision of the NPPG is the acknowledgement of the needs of the logistics industry Paragraph: 031 Reference ID: 2a-031-20190722 (Revision date: 22 07 2019) that:
 - 'The logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities, and has distinct locational requirements that need to be considered in formulating planning policies (separately from those relating to general industrial land)'.
- 5.42 Paragraph: 032 Reference ID: 2a-032-20190722 (Revision date: 22 07 2019) states:

'When assessing what land and policy support may be needed for different employment uses, it will be important to understand whether there are specific requirements in the local market which affect the types of land or premises needed. Clustering of certain industries (such as some high tech, engineering, digital, creative and logistics activities) can play an important role in supporting collaboration, innovation, productivity, and sustainability, as well as in driving the economic prospects of the areas in which they locate. Strategic policy-making authorities will need to develop a clear understanding of such needs and how they might be addressed taking account of relevant evidence and policy within Local Industrial Strategies. For example, this might include the need for greater studio capacity, co-working spaces or research facilities.'



5.43 The NPPG includes guidance across a range of planning issues which are referred to in the NPPF. This includes the importance of good design, general guidance regarding the 'natural environment', and further information about issues such as flood-risk and transport, and refers to issues on which local planning policies are usually expected to provide more specific guidance where relevant to the location and/or site involved.

National Design Guide (NDG) (2021)

- 5.44 The National Design Guide (NDG) (2021) is a material consideration in the decision-making process. The document identifies ten characteristics of well-designed places:
 - Context enhances the surroundings;
 - ii) Identity attractive and distinctive;
 - iii) Built Form a coherent pattern of development;
 - iv) Movement accessible and easy to move around;
 - v) Nature enhanced and optimised;
 - vi) Public spaces safe, social and inclusive;
 - vii) Uses mixed and integrated;
 - viii) Homes and Buildings functional, healthy and sustainable;
 - ix) Resources efficient and resilient; and
 - x) Lifespan made to last.
- 5.45 The NDG states that development should understand and relate well to the site, its local and wider context (C1); respond to existing local character and amenity (I1); comprise well designed, high quality and attractive buildings (I2); create character and identity (I3); and promote a compact form of development and utilise appropriate building types and form (B1 and B2). All modes of transport should be positively designed into the built form, and public rights of way protected, enhanced and well-linked into the wider network of pedestrian and cycle routes. Parking and servicing should be well-considered. Development should also include a network of high quality green open spaces; improve and enhance water management; support rich and varied biodiversity; follow the energy hierarchy; maximise resilience and be adaptable to changing needs and evolving technologies.
- 5.46 The National Model Design Code (NMDC) provides guidance on the production of design codes, guides and policies to promote successful design. The document expands on the ten characteristics of good design set out in the NDG and sets a baseline standard of quality and practice which LPAs are expected to take into account when determining planning applications.
 - The HM Treasury Budget 2021 'Protecting the Livelihoods of the British People'
- 5.47 The Executive Summary summarised that the budget sets out how the Government will extend its economic support to reflect the cautious easing of social distancing rules and the reopening of the economy in the Government's roadmap and states:
 - 'Support in the Budget reflects the easing of restrictions to enable the private sector to bounce back as quickly as possible. As the economy reopens, the Budget sets out the steps the government is taking to support the recovery, **ensuring the economy can build back better**, with radical new incentives for business investment and help for businesses to attract the capital, ideas and talent to grow.'
- 5.48 With regards to an investment-led recovery, the Executive summary states:



'As well as addressing the immediate challenges of the pandemic and the requirement to return the public finances to a sustainable path in the medium term, the government is acting now to lay the foundations for a recovery driven by the private sector that spreads investment and opportunity throughout the UK, by helping businesses to grow, and improving access to skills, capital and ideas.'

5.49 The Budget states that:

'The Budget will further help businesses access the skills, technology and capital they need by modernising and streamlining migration rules, reviewing tax support for research and development, reforming pension rules on investment and reviewing rules for equity offerings. The Levelling Up, UK Community Renewal, Towns and Community Ownership Funds will create well-paid jobs, revitalise places, and develop hubs of innovation in every part of the UK. Alongside the Budget, the government's wider economic plan for significant investment in skills, infrastructure and innovation is set out in 'Build Back Better: our plan for growth'.'

The HM Treasury's 'Build Back Better Our Plan for Growth' (3 March 2021)

- 5.50 The HM Treasury's 'Build Back Better Our Plan for Growth' 3 March 2021 sets out the UK Government's objectives to capitalise on the UK's dynamic and open economy, tackle long-term problems and drive new growth that will enable us to achieve the people's priorities. The Plan for Growth states: 'Our plan to build back better takes a transformational approach, tackling long-term problems to deliver growth that creates high-quality jobs across the UK and makes the most of the strengths of the Union. We must retain our guiding focus on achieving the people's priorities: levelling up the whole of the UK, supporting our transition to net zero, and supporting our vision for Global Britain.'
- 5.51 The report states that this will be achieved by building on three core pillars of growth: infrastructure; skills and innovation.
 - The UK Government's Plan for Jobs
- 5.52 In July 2020, the Government launched the 'Plan for Jobs' a plan to help people back into work and develop the skills they need to thrive as the UK emerges from the pandemic. The HM Government Progress Update report (13 September 2021) states that the Prime Minister has created a new Cabinet Committee to drive action to alleviate problems with logistics and supply chains. The committee will be chaired by the Chancellor of the Duchy of Lancaster and that:

'The government will also launch an industry taskforce to inform the response to labour market and supply chain challenges. The official-led group will bring together major employers, retailers and hauliers to provide industry expertise and insight to ensure government has advance sight of labour market or supply chain challenges ahead of time.'

The National Infrastructure Commission

5.53 The Government response to the National Infrastructure Commission report 'Anticipate, React, Recover: Resilient Infrastructure Systems' (15 September 2021) states that in 2018, HM Government asked the National Infrastructure Commission (NIC) to conduct a study on the resilience of the nation's economic infrastructure. This review covered a subset of critical national infrastructure (CNI) sectors - namely the energy, water, digital, road and rail sectors.



The results of this review were published in May 2020 in the NIC report 'Anticipate, React, Recover: Resilient Infrastructure Systems'.

5.54 This report emphasised the need to consider resilience in the round within a framework that addresses six aspects of resilience - anticipate, resist, absorb, recover, adapt and transform - as identified by NIC. NIC summarises the findings and recommendations in the report as follows:

'To deliver resilient infrastructure, a framework for resilience is required that:

- Better anticipates future shocks and stresses by facing up to uncomfortable truths
- Improves actions to resist, absorb and recover from shocks and stresses by testing for vulnerabilities and addressing them
- values resilience properly
- drives adaptation before it is too late

Much of what is needed is already in place, but improvements can still be made:

- Government should publish a full set of resilience standards every five years, following advice from regulators, alongside an assessment of any changes needed to deliver them
- Infrastructure operators should carry out regular and proportionate stress tests, overseen by regulators, to ensure their systems and services can meet government's resilience standards, and take actions to address any vulnerabilities
- Infrastructure operators should develop and maintain long term resilience strategies, and regulators should ensure their determinations in future price reviews are consistent with meeting resilience standards in the short and long term.'
- 5.55 The response states that:

'The publication of the NIC resilience report occurred at a pivotal time in the nation's approach to resilience. The UK was in the early stages of the Covid-19 outbreak and the opportunities as well as challenges of this period were emphasised in the National Infrastructure Strategy and the Prime Minister's commitment in Autumn 2020 to build back better, greener and faster from the pandemic. '

5.56 The response accepts the recommendation to implement resilience standards for infrastructure operators and appropriate testing against these standards. The details of how these standards will be implemented including the scope and timeframes will be determined following the National Resilience Strategy.'

Written Statement to Parliament 'Planning Reforms for Lorry Parking'

5.57 Published on 8th November 2021 from Department for Transport, Department for Levelling Up, Housing and Communities, and Grant Shapps MP, this states:

'I wish to update the House on the joint initiative between the Department for Transport and Department for Levelling Up, Housing and Communities on planning reforms for lorry parking, and to emphasise the critical importance of the freight and logistics sector to shops, households, assembly lines, hospitals and other public services across the country.



The infrastructure that supports our hauliers is **essential to the effective and resilient supply chains we need.** This government is committed to addressing the strategic national need for more lorry parking and better services in lorry parks in England and we must act now.

To support our hauliers' access to parking and services in the near term we are working with our partners to identify and deliver a number of temporary sites where short-term modular facilities can be installed to address some of our immediate need. We are encouraging National Highways to consider how their land holdings can be used to provide additional parking spaces nationwide, to give priority to the provision of lorry parking across the Strategic Road Network and assist local authorities in identifying areas of lorry parking need.

This government is also determined that the planning system should play its part in meeting the needs of hauliers and addressing current deficiencies. Planning plays a critical part in the allocation of land for lorry parking.

The National planning policy framework sets out that local planning policies and decisions should recognise the importance of providing adequate overnight lorry parking facilities, taking into account any local shortages, to reduce the risk of parking in locations that lack proper facilities or could cause a nuisance. Proposals for new or expanded distribution centres should make provision for sufficient lorry parking to cater for their anticipated use.

In addition, the government's policy is clear that development proposals for new or expanded goods distribution centres should make provision for sufficient lorry parking to cater for their anticipated use. In preparing local plans and deciding planning applications, the specific locational requirements of different industrial sectors should be recognised and addressed. This should include making provision for storage and distribution operations at a variety of scales, and in suitably accessible locations.

We have also published planning practice guidance setting out how local planning authorities can assess the need for and allocate land to logistics site uses and are accelerating work recommended by the National Infrastructure Commission to consider the appropriateness of current planning practice guidance. This includes taking forward a review of how the freight sector is currently represented in guidance.

To ensure future decision-making supports the needs of the sector, we are updating Highways Circular 02/2013 The Strategic Road Network and the delivery of sustainable development fully to reflect the importance of providing logistics and freight, and are updating the National lorry parking survey to ensure strong evidence is available on the national picture in future. A programme of longer-term measures is under development supported by the £32.5 million in roadside facilities for hauliers announced in last week's budget and we will publish a future of freight plan, a long-term strategic plan for the sector, in coming months.

The need for a reliable and efficient supply chain has recently come into sharp focus. It is therefore essential that we put in place mechanisms that deliver a supply chain network that is secure, reliable, efficient, and resilient, with no link in the chain overlooked.

Taken together our planning policies and wider measures will support our logistics and freight sectors and the people that work in them. Working with industry and local authorities we will continue to monitor the situation closely and take further action when it is needed.' [Emphasis added].



The Oxford-Cambridge Arc

- 5.58 The Oxford-Cambridge Arc is a national economic priority area set by the Government and covers an area between Oxford, Milton Keynes and Cambridge. The Arc is formed of five administrative counties: Oxfordshire, Bedfordshire, Buckinghamshire, Northamptonshire and Cambridgeshire, and already support over two million jobs, adds over £110 billion to the economy every year and houses one of the fastest growing economies in England.
- 5.59 The Ministry of Housing, Communities and Local Government 'Planning for sustainable growth in the Oxford-Cambridge Arc: Spatial Framework' (18 February 2021) states that he Oxford-Cambridge Arc creates a transformational opportunity, that would see economic output growing by between £80.4 billion and £163 billion per annum, with between 476,500 and 1.1 million additional jobs¹ by 2050.
- 5.60 The introduction of the spatial framework states that the opportunity is to develop a plan that will:
 - support long-run sustainable economic growth across the area;
 - help to make the area a brilliant place to live, work and travel in for existing residents and future communities alike, and
 - support lasting improvements to the environment, green infrastructure and biodiversity.
- 5.61 Paragraph 2.5 of the report states that:

'The Spatial Framework will help us to deliver the strategy by ensuring that businesses have access to the space and infrastructure they need to grow – including the Arc's high-growth, innovative industries, which have specialist requirements for employment space, such as laboratories – and by ensuring that planning for delivery of infrastructure and housing is based on our Economic Strategy.'

5.62 The Ministry of Housing, Communities and Local Government 'Creating a Vision for the Oxford-Cambridge Arc' consultation report (July 2021) states: 'The government's priority for the Oxford-Cambridge Arc is sustainable economic growth. We are putting sustainable economic growth first because we think that the Arc can be one of the most productive places in the world by creating new jobs, improving the standard of living and the quality of life for local communities. We want to support economic growth that is sustainable – economically, socially and environmentally. Taking this step will also help national prosperity as we build back better from the impacts of COVID-19.'

Local Industrial Strategy OXLEP (August 2020)

5.63 The Oxfordshire 'Local Industrial Strategy '(LIS) (August 2020) sets out a vision for the region to be one of the top three global innovation ecosystems by 2040. Published jointly with the Government in July 2019, the LIS is a statement of Oxfordshire's leadership role in the UK's economy, and the responsibility it holds in driving forward the nation's success on the global stage. The LIS states on page 9 that:

'Oxfordshire is the UK's innovation engine Groundbreaking R&D is creating cutting edge products and services that address today's and tomorrow's most pressing challenges, including COVID-19, climate change, automation, the future of work, and human machine

¹ Planning for Sustainable growth in the Oxford- Cambridge Arc (February 2021)



collaboration. These innovations are powering whole new industries and markets whilst also revolutionising existing sectors in aerospace, manufacturing, tourism **and logistics** to create new jobs and opportunities for supply chains and their workforce across the country.

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

Emerging Development Plan Policy

- 5.64 A new Oxfordshire Plan (2050) and a new Cherwell Local Plan Review (2040) are currently being prepared and once adopted will form part of the Development Plan for the area. The new Cherwell Local Plan Review (2040) will replace the adopted Cherwell Local Plan 2015 and 'saved' policies in the Cherwell Local Plan (1996) due to the early stage of preparation of these documents they have very limited weight. With regards to ongoing timescales, an 'Options Paper' was submitted in September 2021. The Local Development Scheme published in September 2021 suggests the following timescales: Consultation on Proposed Submission Version of the Plan regulation 18 June/July 2022; Consultation of Proposed Submission Version Regulation 19 January February 2023; Submission of the local plan to the planning inspectorate for examination May 2023 and adoption November 2023.
- 5.65 The emerging Oxfordshire Plan 2050 states that the creation of jobs across a range of sectors and in various locations will be supported. Objective five of the emerging plan is to: 'To sustain and strengthen Oxfordshire's economic role and reputation by building on our key strengths and relationships.'
- 5.66 The supporting evidence base 'Oxfordshire Council's Growth Needs Assessment' (July 2021) explains that the scale of employment land needed across Oxfordshire could be up to 807 hectares (2020 2050) of which there is up to a need for 645 hectares of industrial, warehouses and other land (Table 2.3, pages 10 and 11).
- 5.67 With regards to ongoing timescales, a first stage of public consultation (Vision and Objectives) was undertaken during February/March 2019. A second stage was published for consultation on 30 July 2021. The current, revised programme, agreed by the Oxfordshire Growth Board in November 2020 is as follows: consultation on proposed submission version May/June 2022; submission September 2022, examination December 2022; and adoption May/June 2023. It is anticipated that development on the Site could commence on site by 2025.



6.0 PLANNING CONSIDERATIONS – POLICY SLE1

Local Plan Policy SLE1

- 6.1 This section considers the principle of the development against Policy SLE1. Section 7 then goes on to consider the proposals against the other relevant policies in the development plan.
- 6.2 Policy SLE1 is considered to be the most important policy provision for the determination of the Application. Therefore, this section of the planning statement sets out below an analysis of compliance with Policy SLE1.

Exceptional Circumstances

6.3 SLE1 states "Unless exceptional circumstances are demonstrated, employment development in the rural areas should be located within or on the edge of those villages in Category A (see Policy Villages 1)" therefore the policy does envisage the possibility of exceptional circumstances requiring new employment land to be released. The policy test is therefore for the Applicant to show exceptional circumstances to justify, in principle the need for new employment development on unallocated land. Therefore, set out below are the exceptional circumstances for accommodating this development, in short, the urgent need for more land to accommodate logistics floorspace.

Policy Recognition of Need for Logistic Floorspace

6.4 Firstly, the need argument is first demonstrated by reference to recent National, Regional and Local policy (for example as demonstrated in the NPPF, NPPG, Planning for Growth, UK Government Plan for Jobs, National Infrastructure Commission, the planning reforms for lorry parking, Oxfordshire Grown Needs Assessment, Local Industrial Strategy (OXLEP), Oxford-Cambridge Arc). There is a policy recognition of the need for logistics floorspace, with national policy in particular recognising the need for resilience of global supply chains due to the changed circumstances from Covid-19, the UK's changes in trade relationships, and the urgency of the need to promote jobs. There is an urgent need for more land for logistics in the interests of UK and regional growth policy.

6.5 The NPPF states:

"Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential. (Paragraph 81)

Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations." (Paragraph 83) [emphasis added]



6.6 Furthermore, the economic objectives of sustainable development in (NPPF paragraph 8) states that the planning system needs to be **responsive** by ensuring sufficient land of the right types is available in the **right places** and at the **right time** to support growth, innovation and improve productivity. The Cherwell Local Plan (2015), based on evidence dated earlier than 2015, has not accounted for the changed economic circumstances set out below, and has not accounted for the need for logistics development and the NPPG's (2019) fundamental provision of the acknowledgement of the needs of the logistics industry, paragraph: 031 Reference ID: 2a-031-20190722 (Revision date: 22 07 2019) states that:

"The logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities, and has distinct locational requirements that need to be considered in formulating planning policies (separately from those relating to general industrial land)."

- 6.7 National planning policy states:
 - Significant weight should be placed on supporting economic growth; and
 - Planning policies and decisions should recognise the specific locational requirements of different sectors and make provision for storage or distribution operations in suitably accessible locations.
- 6.8 There is an urgent need for more land for logistics in the interests of UK and regional growth policy. The CV19 health pandemic has led to structural changes within the logistics sector in two significant ways. Firstly, the dramatic shift in retail/purchasing away from 'store attendance' to online transactions. Pre-CV19 store attendance activity for the purchase of goods is not anticipated to return, as the purchase of goods online becomes more prevalent, as consumers are more comfortable with the purchase of a wide range of goods online. A key requirement for online traders is now to improve the efficiency in the delivery of goods to customers.
- 6.9 According to the British Property Federation (BPF) economic productivity of £124 billion was generated by the logistics sector in 2019 ('Delivering the Goods in 2020: The Economic Impact of the UK Logistics Sector', (2020)). There is robust growth in the industrial and logistics market as structural change is witnessed in high street retail and growth of e-commerce drives activity into the logistics sector.
- 6.10 More recently the British Property Federation (BPF) (Levelling Up the Logic of Logistics' January 2022) states that in the light industrial, B2 and B8 Use Classes (i.e., the uses classes that require warehouses or factories with associated yard space) £232 billion of GVA was generated and 3.8 million jobs. The report concludes that the sector generates significant economic benefits supporting increasing numbers of high-quality jobs across the English regions. A thriving industrial and logistics sector is therefore critical to the government delivering on its ambitions to 'level up' across the UK with over 70% of demand for industrial and logistics space in the North of England and the Midlands.
- 6.11 Other changes in the logistics sector is the realisation that global supply chains lack resilience in the certainty of supply and in timescales for the delivery of goods. The UK's changed trading relationships and natural and man-made disasters, for example the Suez Canal being blocked by the Ever Given container ship for 6 days in March 2021, also has consequences for reliability of supply chains. As a consequence, logistics companies supplying goods to UK manufacturers require greater levels of stock holding within the UK so termed 'stock buffering'.



- 6.12 The Covid19 pandemic restrictions have accelerated this long-term adjustment, which is also associated with Brexit. Rapid changes are occurring to occupier requirements, in particular a trend towards larger footprint buildings which offer economies of scale and a shift for precautionary logistics in reaction to potential disruption of supply chains, larger buildings allow manufacturers to buffer stock.
- 6.13 Despite the impact of the pandemic, warehousing and logistics have proved extremely resilient. Projections show continued expansion driving demand for space and larger employment, in accessible locations, suitably distanced from residential areas.
- 6.14 As set out above in Section 5 above, the UK Government has responded to this in its growth policies, for example, by:
 - The Budget 2021 recognising the need to lay the foundations for a recovery driven by the private sector that spreads investment and opportunity throughout the UK, by helping businesses to grow, and improving access to skills, capital and ideas.
 - The Government's wider economic plan for significant investment in skills, infrastructure and innovation as set out in 'Build Back Better: our plan for growth'.
 - The 'Plan for Jobs' with the creation of a new Cabinet Committee to drive action to alleviate problems with logistics and supply chains.
 - The NIC, where the need for resilience was recognised when the UK was in the early stages of the Covid-19 outbreak and the opportunities as well as challenges of this period were emphasised in the National Infrastructure Strategy and the Prime Minister's commitment in Autumn 2020 to build back better, greener and faster from the pandemic.
 - In the planning reforms for lorry parking which reflect the importance of provision of logistics, and freight to deliver a supply chain network that is secure, reliable, efficient and resilient.
- 6.15 At the regional level, the Proposed Development will help realise the objectives of the emerging Oxfordshire Plan 2050, which aim to facilitate economic growth and employment and support an increase in skills. The supporting evidence base for the emerging plan, 'Oxfordshire Council's Growth Needs Assessment' (July 2021) states there is up to a need for 645 hectares of industrial, warehouses and other land (Table 2.3, pages 10 and 11). It will also respond to the emerging spatial framework and vision of the Oxford-Cambridge Arc which recognises that "The government's priority for the Oxford-Cambridge Arc is sustainable economic growth." Furthermore, The Oxfordshire 'Local Industrial Strategy '(LIS) (August 2020) is a statement of Oxfordshire's leadership role in the UK's economy, and the responsibility it holds in driving forward the nation's success on the global stage.
- At the local level, the Local Plan (page 10) states that: "securing the economic future of the District is the main priority of this Plan". Remaining economically competitive is a critical challenge facing the District over the next two decades (Local Plan paragraph 1.6). Key challenges to achieving a sustainable local economy in Cherwell include a requirement for new employment sites to meet modern business needs; providing potentially suitable employment sites in rural areas; the relatively high number of people in the District without qualifications and basic skills; and pockets of multiple deprivation in the District (paragraph A.14).
- 6.17 The industrial and logistics sector will be instrumental in the economic recovery of the UK. Logistics is an important part of Cherwell's economy as a business sector in its own right and



as an enabler to the success of other businesses of all sizes and sectors. This aspect of recovery will not be possible without suitable strategic employment sites, such as the Application Site, to accommodate the necessary growth.

- 6.18 The Local Plan also recognises that there is insufficient diversity within the local economy, an overdependence on a declining number of manufacturing jobs and a need to respond to a growing and ageing population. The Local Plan's Strategic Objectives therefore include:
 - 'SO 1 To facilitate economic growth and employment and a more diverse local economy with an emphasis on attracting and developing higher technology industries
 - SO 2 To support the diversification of Cherwell's rural economy
 - SO 3 To help disadvantaged areas, support an increase in skills and innovation, improve the built environment and make Cherwell more attractive to business by supporting regeneration.'
- 6.19 Paragraph B.32 of the Local Plan states that: "We will support the logistics sector, recognising the jobs it provides and the good transport links that attracts this sector".
- 6.20 The Proposed Development will help address the challenges facing Cherwell (many of which have been exacerbated by the Covid-19 pandemic) and will facilitate economic growth and employment.

The Cherwell Local Plan Review is not anticipated to be adopted until November 2023 at the earliest. However, it is understood that its progress may be delayed by delays in the progress of the Oxfordshire Plan 2050, which was supposed to be submitted to the planning inspectorate for examination in September 2022 but this timescale has not been achieved. It is understood that the Local Plan Review was then to follow this, therefore further delays in the Cherwell Local Plan Review are anticipated. Given the significant and growing need for logistics floorspace, further employment development needs to be secured now and in advance of the Local Plan Review.

- 6.21 The Proposed Development will address a specific national, regional and local need for logistics floorspace and will help build a strong and competitive economy. The development will create a significant number of jobs across a wide range of skill sets. However, these benefits will only be realised if the substantial and growing need for logistics floorspace along the M40 corridor is addressed.
- 6.22 The Proposed Development will provide high quality logistics floorspace in a highly accessible location. The Proposed Development is ideally placed to address the growing need for logistics floorspace as it will be highly accessible to the strategic road network (which is a fundamental requirement of logistics operators).
- 6.23 Tritax Symmetry has an exemplary track record of successful logistics and warehouse development in Cherwell, for example in Banbury and Bicester, and further afield. Through live enquiries and negotiations with prospective occupiers, and advice from the consultant team, there is knowledge of the local and regional market. The scheme is brought forward as a direct response to the strong market demand for logistics floorspace with rapid access to the strategic highway network.
- 6.24 Advanced discussions are being held with a number of occupiers about occupying a significant proportion of the floorspace proposed. A key component of the scheme is a



- development platform able to accommodate a large regional (or national) distribution centre, where economic activity has been particularly strong in recent years, as evidenced by the size and scale of current requirements in the market.
- 6.25 The substantial and growing need for logistics floorspace is a significant material consideration in the decision-making process. The Proposed Development will provide high quality logistics floorspace in a highly accessible location adjacent to Junction 10 of the M40.
- 6.26 The NPPF states that significant weight should be placed on supporting economic growth and recognises the specific locational requirements of the logistics sector. The Proposed Development aligns with this and will also significantly contribute towards several of the strategic objectives set out within the Cherwell Local Plan. The decision-making framework is therefore in favour of development of the type proposed, and the wide-ranging benefits arising from the Proposed Development represent significant material considerations that weigh in favour of the proposals.

Market Analysis of Need

- 6.27 The need argument is demonstrated by the reports prepared by Savills, which confirm that there is an increasing need for logistics and warehouse floorspace nationally, and along the M40 corridor specifically.
- 6.28 Research by Savills for the UK Warehousing Association (UKWA) 'The Size and Make-up of the UK Warehousing Sector' (2021) states that:
 - The number of logistics and warehouse units has risen by 32% since it was last reported six years ago;
 - The trend toward bigger units is propelling this rise with demand for units of 92,903 sq.m, an increase of 242%;
 - Third party logistic companies are now the leading occupiers while online retailers have increased occupancy by 614%, For every £1billion spent online another 7,199 sq.m of warehouse space is needed to meet demand.
- 6.29 A Market Analysis Report has been prepared by Savills to support the outline planning application.
- 6.30 The Market Analysis report presents the Site, its planning policy context and its property market areas (PMAs). Whilst the analysis also covers the national market dynamics, the primary focus is on the Wider and Local PMAs. The Local PMA is defined as Cherwell District, the wider PMA reflects the M40 corridor stretching from High Wycombe in the south to Leamington Spa in the north. The Wider PMA is considered a more relevant area for analysis given typical areas of search of potential occupiers. The southern part of the wider corridor is constrained by Green Belt designations.
- 6.31 The report confirms that the current adopted Cherwell Local Plan 2011-2031 (Part 1), was last updated in 2015 and only partially accounts for the latest economic trends leading to higher demand for employment land in the logistics sector. The latest available evidence base is the Cherwell District Council's Economic Needs Assessment (2021). This estimates future need for employment land and finds that there is a need to create up to 47% more employment land for transport and storage than at present by 2040.



- 6.32 The report estimates future demand, and reviews market signals for information on whether the market is demand or supply constrained. Over the past five years the national logistics and industrial property market has shown a steady growth of approximately 5% of total stock cumulatively, which is mainly driven by an increase in the supply of larger units. This reflects the growth in requirements by logistics operators for larger premises to accommodate higher levels of throughput. At the national level there has been a substantial decrease in both total available floorspace and availability rates over the last decade. This indicates that there has been a consistent supply constraint in this market segment since 2014. The situation has become particularly acute in the last 2-3 years with growing demand and dwindling supply. The availability rate dropping as low as 3% of total stock in 2021 where a usual benchmark for an efficient market is for vacancy to be 8% of total stock.
- 6.33 With regard to supply in the Wider and Local PMAs the key findings are:
 - There is a considerable shortage of above-average quality premises. In the Wider PMA there is a total of about 690,000 sq.ft of floorspace currently available on existing sites able to accommodate units larger than 100,000 sq.ft, of which only 190,000 sq.ft are above average quality equivalent to 0.8% of total stock in that market segment. This means that more than 70% of currently available floorspace does not meet requirements for modern, high-quality premises.
 - The same market segment is more constrained in the Local PMA with only about 50,000 sq.ft of floorspace currently available on existing sites, of which 40,000 sq.ft are above average quality – equivalent to 0.6% of total stock in that market segment.
 - In a growing logistics market such as the Wider and Local PMAs modern available logistics premises should comprise a substantial proportion of stock to allow for the warehouse market to function and for economic growth in the area not to be constrained. Thus, there is an urgent need for new largescale, state-of-the-art premises to be made available through new deliveries.
- 6.34 With regards to demand, a model (which has been endorsed by the BPF, as confirmed in the Levelling Up the Logic of Logistics' January 2022 report) has been used to estimate total demand including an allowance for suppressed demand. Demand in the Wider PMA has on average increased over the last decade. However, the increase in occupancy rate has been held back by supply constraints and increased by a relatively modest 1.8% p.a. A large amount of suppressed demand has built up over that period of time. It is estimated that suppressed demand makes up more than 40% of total demand in this market segment.
- 6.35 Total demand for premises larger than 100,000 sq.ft in the Wider PMA is estimated to be approximately 740,000 sq.ft per annum on average. When projected forward over 10 years the estimates amounts to a cumulative total of approximately 7.4m sq.ft. In the Local PMA total demand is estimated to be approx. 580,000 sq.ft in 2022 amounting to a cumulative total of approx. 5.8m sq.ft over the short and medium term.
- 6.36 With regards to supply versus demand, the figures show that without including Symmetry Park Ardley demand of 7.40m sq.ft is 5.7m sq.ft more than allocated assessed deliverable supply of 1.7m sq.ft. Supply only represents 23% of demand. When Symmetry Park Ardley is included then supply increases to 4.1m sq.ft and the gap between demand and supply is reduced to 2.2m sq.ft, or 55% of total estimated demand.
- 6.37 The report concludes that without allowing Symmetry Park Ardley to come forward there is not enough allocated land available and likely to come forward to meet anticipated demand



over the next 10 years. If Symmetry Park Ardley is permitted then the gap between supply and estimated demand is reduced substantially but still leaves insufficient capacity to meet estimated demand.

Conclusions

- 6.38 The key criteria for a successful logistics site are motorway proximity, junction access, connectivity to road, rail, air and sea as well as the size of the site and the potential quantum of accommodation. The Proposed Development will be located on the border of the South East and East Midlands regions. These regions are traditionally regarded as the two 'powerhouses' of the UK logistics market but demand significantly outweighs supply.
- 6.39 The industrial and logistics sector will be instrumental in the economic recovery of the UK. Logistics is an important part of Cherwell's economy as a business sector in its own right and as an enabler to the success of other businesses of all sizes and sectors. This aspect of recovery will not be possible without suitable strategic employment sites, such as the Application Site, to accommodate the necessary growth.
- 6.40 Development of the Application Site would help drive economic growth in and provide a source of new employment opportunities, as the Site has the benefits of an optimal commercially attractive location, away from large areas sensitive residential of residential receptors) but close to the motorway network and with a local labour supply. A Labour Market Analysis has been submitted as part of the planning application. This concludes there is a suitably sized and qualified workforce within the labour market area. This area has a large, suitably skilled and qualified potential workforce that is growing faster than the wider region and the UK. The area also has a notable specialisation in logistics.
- 6.41 The development would generate up to 2,430 jobs (on and off site operational), and the development is expected to contribute some £148 million per year gross value added (GVA).
- 6.42 Junction 10 of the M40 Motorway is in close proximity to the site, importantly this junction also provides north and south bound vehicle access and is broadly equidistant from Birmingham and London, two key population and commercial centres in the UK. The proposals will address a significant need for logistics floorspace along the M40 motorway corridor. The Site benefits from fast road transport links to London, Birmingham and the M25 and is ideally placed to meet this growing need.
- 6.43 Economic and labour market considerations are also key drivers for the suitability of a site and location as a logistics hub, in addition to the transport links and connectivity the subject site benefits from.
- 6.44 Without the Application Site, the supply imbalance will worsen and contribute to the already high levels of unsatisfied need in Cherwell and the wider region.
- 6.45 This unsatisfied need has been exacerbated by the Covid-19 pandemic and evolving consumer trends, and will continue given the limited development pipeline', which is not sufficient to satisfy the demand. Whilst the pandemic has certainly accelerated demand for more online shopping, there are many other longer-term factors driving a race for logistics floorspace from the growth of high-tech manufacturing to supply chain changes coming from our new trading relationships with the EU and the world. The Proposed Development will help address the need for high-quality logistics floorspace. Rapid changes are occurring to occupier requirements, in particular a trend towards larger footprint buildings which offer



- economies of scale and a shift for precautionary logistics in reaction to potential disruption of supply chains.
- 6.46 The Applicant has the knowledge and expertise to deliver the high-quality scheme at the scale proposed and to provide a development platform for a single large warehouse distribution facility, as well as a range of other building sizes. The Site is also of a scale that lends itself to a mix of unit sizes, including large logistics buildings, that would be attractive to international, national and regional occupiers.
- 6.47 The fact that there is no suitable allocated or committed sites available that meet this investment requirement is in itself a crucial consideration in establishing 'exceptional circumstances'.
- 6.48 The phrase 'exceptional circumstances' should be given its ordinary meaning within the proper context, and means 'much greater than usual'. The development plan anticipated that employment development needs would ordinarily be met on allocated or committed sites but has acknowledged that 'exceptional circumstances' may exist justifying in principle the provision of employment on an unallocated site, i.e., the development plan envisages that sites may come forward on unallocated sites in rural areas.
- 6.49 The development would build on existing local economic strengths in the logistics sectors, making a readily deliverable, achievable and highly significant contribution to a strong and competitive regional economy, as already demonstrated by the success of the other logistics development, for example, at Banbury (also by these applicants) which is fully occupied,
- 6.50 Rapid increase in the number of logistics businesses in this market has resulted in employment land being in particularly short supply. Demand evidently also extends beyond warehousing and distribution, as production returns to the UK post Brexit, and operators seek locations with good access and labour supply.
- 6.51 A substantial planning need exists for major logistics development of the kind proposed in this application. The broad evidence of need for the type of employment land represented by the Application Site is material to the consideration of this application.
- 6.52 For the reasons set out above 'exceptional circumstances' have been demonstrated in compliance with Policy SLE1.
- 6.53 The evident need for development of the type proposed carries substantial weight in the planning balance.
- 6.54 It is plain, from the foregoing assessment of employment need and supply, that the Proposed Development would contribute substantially to the national policy imperative, expressed in paragraphs 80 and 82 of the NPPF, to promote and support a strong competitive economy, particularly with regard to the need for storage and distribution facilities, at a variety of scales, in accessible locations
- 6.55 The Proposed Development is in accordance with NPPF policies which seek to build a strong and competitive economy and support economic growth and productivity (taking into account wider needs for development).

Assessment of the Other Provisions of SLE 1



- 6.56 This section now undertakes an assessment of the proposals against the provisions of policy SLE1 which may be articulated by posing the following questions:
 - 1. With employment development to be focused on existing sites, are there existing vacant employment sites at Banbury, Bicester or Kidlington or the rural area which could accommodate this development?
 - 2. Are there sites in or on the edge of Category A villages that could accommodate the proposal?
 - 3. Does the proposal satisfy the other SLE1 criteria for employment development on a non-allocated site in the rural area?
 - 1. With employment development to be focused on existing sites, are there existing or vacant employment sites at Banbury, Bicester or Kidlington or the rural area which would accommodate this development?
- 6.57 In order to establish whether the Proposed Development could be accommodated on an existing employment site it is necessary to identify the 'parameters' for the site search for a national /regional scale logistics development.
- 6.58 The proposals need to respond to the distinct locational requirements for the logistics sector, particularly in the context of the scale of land releases to meet occupier demand, and the accessibility of sites to the strategic highway network for both the receipt of goods by HGVs and the onward delivery of goods to customers, 24 hours a day, seven days a week, for 365 days of the year.
- 6.59 These locational requirements equally apply to the receipt and delivery of goods for retail customers and to businesses including manufacturers to support 'just in time' deliveries to continuous production lines.
- 6.60 There is a need to accommodate national/regional scale logistics facilities which are not well suited to an edge of urban area location. This scale of logistics operation needs to be located on sites that are well connected to the strategic highway network.
- 6.61 These locational and operations criteria are set out below:
 - The geographical proximity to a strategic highway network

(Reason: To ensure shorter journeys, sites need to be accessible to the strategic highway network for both the receipt of goods by HGVs and the onward delivery of goods to customers, maximisation of access to potential markets and minimisation of drive times to potential markets, with ready access to a suitably skilled workforce (well-connected or capable of being well connected for the workforce). The quality of the route to the strategic highway network is important, for example torturous routes through villages are not acceptable).

• Minimum site area of 10 hectares:

(Reason: To ensure that the building components and infrastructure can be accommodated on the Site, and that at a minimum a regional development can be provided and the land is of a scale to meet potential occupier requirements, and the ability of a site to accommodate the necessarily large footprint and building height. In order to ensure a robust site assessment a threshold of 10 hectares has been set, but a site area of 20 hectares is more likely to be required).



• The overall suitability of the location for B8 uses

(Reason: To ensure that the Proposed Development is able to assimilate within the surrounding area effectively, including not giving rise to disturbance to neighbouring land uses, and having a landform suitable for B8 uses).

- 6.62 The extent of the site search comprises:
 - Land comprising existing or allocated employment sites within Banbury, Bicester and Kidlington and the rural areas (See Appendix 1 for details of the site search).
- 6.63 Table 1 below identifies the allocated strategic scale (employment sites within the Cherwell Local Plan) sites analysed within the District. The suitability and availability of each of the strategic employment allocations to accommodate the proposals has been assessed in the comments column below. A more detailed assessment of each of the sites is contained in Appendix 1.

Table 1: Assessment of Strategic Sites

Policy	Site	Included in Site	Comment
		Assessment	
Bicester Allocated Site			
Bicester (BIC1)	Bicester Planning	Yes	Marketing name: Axis 9, Bicester
	Policy North West		Developer: Albion Land
	Bicester Eco-Town		Site area 10ha.
			The site is now fully developed with the
			last two units about to be completed and
			now let to Arrival and The Menu, both
			local occupiers.
			The site is fully developed.
Bicester (BIC2)	Graven Hill	Yes	The employment land extends to 26ha.
			The scale of the remaining land, is 18.68
			hectares, after the parcel of land for the
			approved Barrus development (circa
			7.32ha has been deducted. The irregular
			shape would struggle to accommodate the
			Proposed Development.
Bicester (BIC4)	Bicester Business	Yes	Site Area 29.5ha. Now known as Bicester
	Park		Office Park. The site is allocated for Use
			Class B1a (Offices) and is therefore not
			allocated for B8 uses. Additionally, the
			remaining 13.01ha has an irregular shape
			making it impossible to accommodate the
			Proposed Development.
Bicester (BIC10)	Bicester	Yes	The site area is 18ha. The site is allocated
	Gateway/Catalyst		for Use Class B1a (Offices) and is therefore
	Bicester		not allocated for B8 uses. The site is
			already mostly developed by Albion Land.
			There is not available supply of land for
			logistic uses.
Bicester (BIC11)	Employment Land	Yes	The site is known as Link 9 and is fully built
	at North east		out with no available allocated
	Bicester		employment land.
Bicester (BIC12)	South East	Yes	23.15ha of employment land - 6.66ha
	Bicester		included the Wretchwick Green approval



			and 16.49ha that forms the Symmetry Park logistics park. Symmetry Park include Units A1 and A2 (occupied) Units B (currently being fitted out by OCADO), which leaves 6.75ha of remaining land which is being developed as a 270,000 sq ft unit. Neither the undeveloped land within Wretchwick Green (6.6ha) nor Symmetry Park (6.7ha) are large enough to accommodate the Proposed Development.
Banbury Allocate	d Site		
Banbury (BAN6)	Banbury 6: Employment Land West of the M40	Yes	The CM40 employment land has now been fully built out and let to occupiers including Prodrive and Arriva.
Banbury (BAN15)	Employment Land North East of Junction 11	Yes	The site area is 13ha as marketed as Frontier Park. There is one unit remaining of 130,000 sq. ft. The site is not large enough to accommodate the Proposed Development.
Rural Areas			
Villages 5	Former RAF Upper Heyford	Yes	Employment on the allocation will be provided by the retention of the existing buildings already in commercial use. These include buildings on the historic air field that lies within a Conservation Area and would not be appropriate for reuse/demolition for the Proposed Development, in addition to being too small to accommodate the Proposed Development. The allocation includes a further 13.4ha of employment land. As the site is located in or adjacent to a Conservation Area/listed building, a large-scale logistics B8 use would not be compatible.

6.64 The same exercise has been undertaken for other committed employment sites in the District as set out in Table 2.

Table 2: Assessment of Committed Sites

Planning Ref	Location	Description	Notes	Suitable/available
18/01333/F	Bicester	Extension to existing	The site	Not suitable – will not
	Heritage	Technical Site to provide	extends to	accommodate the
	Buckingham	new employment units	1.6ha. The	scale of development
	Road Bicester	comprising flexible B1(c)	remainder of	required.
	(Forms part of	light industrial, B2	the site is	
	Planning Policy	(general industrial), B8	allocated for	
	BIC8 Former	(storage or distribution)	heritage tourist	
	RAF Bicester)	uses with ancillary offices,	development.	
		storage, display and sales,		
		together with associated		
		access, parking and		
		landscaping.		



Planning Ref	Location	Description	Notes	Suitable/available
18/02160/F	Part Of OS Parcel 0083 North Of 89 Cassington Road Yarnton	Redevelopment of part of the site with new purpose-built buildings for B1 and B8 use including provision for access onto Cassington Road.	The site area is 0.72ha.	Not suitable – will not accommodate the scale of development required/ Use Class not compatible.
19/02708/OUT	Bicester Heritage Buckingham Road Bicester	Outline: Provide new employment units comprising B1 (Business), B2 (General Industrial), B8 (Storage) and D1 (Education) uses with ancillary offices, storage, display and sales, with all matters reserved except for access.	The site area is 10.08ha.	Not suitable – will not accommodate the scale of development required, in particular adjacent to listed building which comprises part of Bicester Heritage.
20/00247/F	Land South East of Town and Country Scaffolding Ltd Tramway Road Banbury	Erection of three B1 (c) light industrial units	The site area is 0.54ha.	Not suitable – will not accommodate the scale of development required.
19/02081/F	Land Adjacent to Unit E25 Telford Road Bicester	Erection of four Class B2 units of varying sizes with associated car parking and landscaping - Resubmission of 19/00545/F	The site area is 0.8ha.	Not suitable – will not accommodate the scale of development required.
20/02139/F	E P Barrus Ltd Launton Road Bicester OX26 4U	Demolition of existing VOSA buildings and the erection of two new commercial buildings.	The site area is 0.6ha.	Not suitable – will not accommodate the scale of development required.

6.65 A further assessment of the urban areas within Banbury, Bicester and Kidlington has been undertaken to establish that there is no urban area of land that lies vacant, or awaits redevelopment of a scale to accommodate the Proposed Development.

Conclusion

The analysis above reveals that allocated employment sites of a strategic scale are too small, not suitable or not available and there no other sites committed for employment within Banbury, Bicester or Kidlington that can accommodate the Proposed Development's requirements.

2. Are there sites in or on the edge of Category A villages that could accommodate the proposal?

6.66 An assessment of the suitability and availability of land at each of the category A villages (as identified in Policy Village 1) to accommodate the Proposed Development has been undertaken. Further details on the findings including the sites referenced below is contained in Appendix 2. A summary of the findings is contained in Table 3 below.



Table 3: Assessment of Category A Village Assessment

Villages	Comments	Suitable/available Sites
Adderbury	Potential Site 1 Identified: Located to the north west of the	NONE
	village. Bloor Homes has an option on the site for future	
	residential development, therefore the site is not available. The	
	scale of the Proposed Development would adversely impact the	
	rural character of the village. The site is not large enough. The	
	site is not suitable. There are no other sites within the village that	
Ambrosden	could accommodate the proposals. Potential Site 1 Identified: Located to the north of Ambrosden	NONE
Ambrosuen	and extends to the A41. The site would fill the gap between the	NONE
	edge of the village and the A41. The scale of the Proposed	
	Development would adversely impact the rural character of the	
	village and would have an unacceptable impact on the character	
	of the village and its setting in this location. The site is not	
	suitable. There are no sites within the village that could	
	accommodate the proposals.	
Arncott	Village does not benefit from access onto the A41 and is not close	NONE
	to a motorway. Land surrounding the village is affected by	
	restrictive planning designations, and is controlled by the Ministry	
	of Defence.	
Begbroke	Begbroke village and surrounding area lies within the Oxfordshire	NONE
	Green Belt. The proposed develoment located on the edge of	
	Begbroke would constitute inappropriate development in the	
	Green Belt precluding development. There are no sites within the	
Districts and an	village that could accommodate the proposals.	NONE
Bletchingdon	Land to the south and east of the village is located within the	NONE
	Oxfordshire Green Belt. The village does not have access to an A road. Heritage Assets further preclude development on the	
	village edge. There are no other sites within the village that could	
	accommodate the proposals.	
Bloxham	Potential Site 1 and 2 identified: Both sites are located to the	NONE
	south of the village either side of the A361. Both sites do not fulfil	
	the proposals requirements. There are no sites within the village	
	that could accommodate the proposals.	
Bodicote	Heritage Assets and potential coalescence between the village	NONE
	and Twyford to the south precludes development in this village.	
Chesterton	Potential coalescence with Bicester and Heritage Assets	NONE
	precludes development on the edge of this village. The village	
	does not have access to an A road. There are no sites within the	
6	village that could accommodate the proposals.	NONE
Cropredy	Heritage Assets preclude development on the village edge. There	NONE
	are no sites within the village that could accommodate the	
Deddington	proposals. Potential Site 1 Identified: Land to the north west adjacent to	NONE
Deddington	Banbury Road is optioned for residential development which	INOINE
	precludes this site for development. The Deddington	
	Conservation Area precludes development to the south the	
	B4031 and the East and west of the A4260. The site would not be	
	suitable, the Banbury Road through the village would not be	
	suitable for HGV traffic. There are no sites within the village that	
	could accommodate the proposals.	
Finmere	There are no sites of sufficient capacity to accommodate the	NONE
	proposals. The scale of the operation would overwhelm the	
	character of the village and its surroundings.	

PF/10679



Fringford	Impact on ecological and Heritage Assets, as well as the scale of	NONE
rinigiola	the proposals precludes development on the edge of this village.	INCINE
	The village does not have access to an A road. There are no sites	
	within the village that could accommodate the proposals.	
Fritwell	The extent of the Conservation Area precludes this village from	NONE
riitweii	being able to accommodate the scale and operation	NONL
	requirements of the proposals. The village does not have access	
	to an A road. There are no sites within the village that could	
	accommodate the proposals.	
Hook Norton	Heritage and ecologial issues precludes this village from being	NONE
HOOK NOITOH	able to accommodate the scale and operation requirements of	NONE
	proposals. The village does not have access to an A road and is	
	not close to a motorway. There are no sites within the village that	
	could accommodate the proposals.	
Kidlington	Kidlington and the surrounding area lies within the Oxfordshire	NONE
	Green Belt. The proposed develoment located on the edge of	HOHL
	Kidlington would constitute inappropriate development in the	
	Green Belt precluding development. There are no sites within the	
	village that could accommodate the proposals.	
Kirtlington	Impact on Heritage Assets and the scale of the proposals	NONE
	precludes development on the edge of this village. There are no	
	sites within the village that could accommodate the proposals.	
Launton	Potential Sites 1 and 2 identified: Site 1 would fill the gap between	NONE
	Launton and Bicester, which would erode the rural character of	
	the village. Sites 1 and 2 would result in an unacceptable impact	
	on the adjacent Heritage Assets. The scale of the the proposals	
	would have an unacceptable impact on the character of the	
	village and its setting. There are no sites therefore that could	
	accommodate the proposals.	
Milcombe	Potential Sites 1 and 2 identified: The scale of the proposed	NONE
	proposals would adversly impact the rural character and the	
	setting of the village. There are no sites within the village that	
	could accommodate the proposals.	
Sibford	Impact on Heritage Assets and the scale of the proposals	NONE
Ferris/Sibford	precludes development on the edge of this village. There are no	
Gower	sites within the village that could accommodate the proposals.	
Steeple Aston	Impact on Heritage Assets and the scale of the proposals	NONE
-	precludes development on the edge of this village. There are no	
	sites within the village that could accommodate the proposals.	
Weston-on-the-	Heritage Assets and part of the village being included in the	NONE
Green	Oxfordshire Green Belt precludes development on the edge of	
	this village. There are no sites within the village that could	
	accommodate the proposals.	
Wroxton	Significant heritage assest, Wroxton Abbey and Grade II* listed	NONE
	parkland, preclude development within or on the edge of this	
	village.	
Yarnton	The proposals on the edge of this village would constitute	NONE
	inappropriate development in the Green Belt, where the	
	Application site could be considered an alternative option, not	
	requiring release of Green Belt land. There are no sites within the	
	village that could accommodate the proposals.	

6.67 It is submitted that the above analysis robustly demonstrates that there is no suitable land to meet the development requirements of the Proposed Development within or on the edge of a Category A village or in the rural areas.

PF/10679



- 3. Does the proposal satisfy the other SLE1 criteria for employment development on a non-allocated site in the rural area?
- 6.68 The operation of Policy SLE1 now requires consideration of the Proposed Development against the other criteria set out within the policy. The criteria are broad and overlaps with other planning policies in the development plan, these are assessed in the next section.

Policy SLE1: They (employment sites) will be outside the Green Belt, unless very special circumstances can be demonstrated. (Bullet Point 1)

- 6.69 The Proposed Development is outside of the Oxfordshire Green Belt.
- 6.70 The Proposed Development complies with Bullet Point 1

Policy SLE1: Sufficient justification is provided to demonstrate why the development should be located in the rural area on a non-allocated site (Bullet Point 2): and,

Policy SLE1: There are no suitable available plots or premises within existing nearby employment sites in the rural area. (Bullet Point 7)

- 6.71 The site search assessment has demonstrated that there are no available or suitable sites that are committed for employment development in the Cherwell Local Plan. It is therefore necessary to consider a non-allocated site in the rural area.
- 6.72 The Proposed Development will be highly accessible to the strategic road network, which is a fundamental requirement of logistics operators. The Site is located immediately adjacent to Junction 10 of the M40 and will allow for fast and easy access to the motorway as well as the major 'A roads'. The proposed buildings would be able to serve national, regional and local need and there are very few sites nationally that have such favourable road links.
- 6.73 The Proposed Development complies with bullet points 2 and 7

Policy SLE1: They will be designed to a very high-quality standards using sustainable construction, and be of an appropriate scale and respect the character of the villages and the surroundings (Bullet Point 3)

Designed to Very High-Quality Standards Using Sustainable Construction

- 6.74 To mitigate for the anticipated operational energy related emissions, the Proposed Development will use the 'energy hierarchy' to reduce carbon emissions. The operational energy usage will be reduced using passive measures included within the design of the development. These will reduce energy use and the associated CO₂ emissions and include: U values which exceed Building Regulation requirements; engineered facade design; and reduced air permeability.
- 6.75 The next level in the energy hierarchy is to maximise energy efficiency. High efficiency systems, plant, controls and equipment will be incorporated into the development such as: energy efficient LED lighting; enhanced lighting controls automatic presence detection will be included in appropriate areas of the building. This form of control will ensure lights are automatically switched off during periods of non-occupancy; optimised plant controls; variable speed drives variable speed drives will be installed on circulation pumps and ventilation fans to allow the speed of the respective motors to be amended by the automatic



- controls to suit changing load of the building; and inclusion of heat recovery on ventilation systems. All buildings will meet at least BREEAM 'Very Good' standards.
- 6.76 The Proposed Development will be of a high quality and sustainable construction. Tritax Symmetry has made a commitment that all their new commercial buildings will be 'Net Zero Carbon in Construction'.
- 6.77 The final level in the energy hierarchy is to incorporate renewables / low carbon technology. It is anticipated that the PVs and air source heat pumps will be incorporated.
- 6.78 The whole of the useable roof area is constructed to accept PV panels; however, the final percentage of roof coverage of PVs will depend on the final operator's energy usage. The initial base build PV coverage is generally sufficient to power the building. Occupiers can then add further PV panels to meet their specific needs. This helps to avoid manufacture of redundant units and allows the most efficient units available to be used when required. The building design utilises a steel frame structure with light weight walls and roof cladding. This minimises the load bearing capacity of the structure, particularly relating to the roof. Thereafter the roof structure of the unit has been designed to take further PVs in the future.
- 6.79 The submitted Framework Travel Plan contains details of the measures incorporated to reduce the impact of transport associated with the development. This will assist in reducing carbon emissions associated with operational transport. These measures include: on site covered cycle parking; shared pedestrian/cycle routes; 25% of spaces to be electric vehicle recharging facilities; and a shift-based bus service.
- 6.80 In summary, the sustainability credential of the proposed scheme can be summarised as follows:
 - Net Zero Carbon in Construction;
 - At least 18% available roof coverage PV installation plus infrastructure for 100%;
 - 25% Electric Vehicle Charging for car parking provided with infrastructure for 100% provision;
 - 25% improvement on potable water usage;
 - Improvements to public transport provision, local cycling and pedestrian network;
 - On site cycle storage facilities;
 - Minimum BREEAM Very Good certificate; and
 - Biodiversity Net Gain.

Appropriate scale and respect the character of the villages and the surroundings

6.81 With regards to the proposal being of an appropriate scale and respect the character of villages and the surroundings, the Proposed Development is not within a village or rural settlement. The Parameter Plans identify 'Build Zones' as well as substantial areas of soft landscaping and bunds. A masterplan approach has been adopted to ensure that development is of a high-quality design and sensitive to its surrounding landscape.

The Proposed Development complies with bullet point 3

Policy SLE1: They will be small scale unless it can be demonstrated that there will be no significant adverse impact on the character of a village or surrounding environment (Bullet Point 4).



- 6.82 The local village in close proximity of the Site is Stoke Lyne. The Heritage Assessment and Landscape and Visual Impact Assessment considers the impact the Proposed Development will have on the setting of Stoke Lyne. These assessments form a robust basis on which to assess how the Proposed Development will impact the character of this village.
- 6.83 Stoke Lyne is located approximately 1 mile to the east of the Site. In assessing the impact of the Proposed Development, the Landscape Visual Impact Assessment concludes that at year 15, proposed landscape measures within the Application Site, including tree planting, landscaped bunds and a range of proposed new habitat types, would have matured, assimilating the Proposed Development into the wider landscape context.
- The Proposed Development is situated next to the A43 and the B4100 and is not within a village or rural settlement. The Proposed Development will not have any adverse impact on the character of any village. The submitted parameters plan identifies areas of soft landscaping including a large landscaping buffer to the east of the Site. The development is sensitive to its surrounding landscape. A detailed landscaping scheme will be submitted as part of subsequent reserved matters Applications and will be required to comply with the approved Parameter Plan. It is submitted that the individual identity and character of Stoke Lyne will be retained, there will be no significant adverse impact on the character of a village or surrounding environment.

The Proposed Development complies with bullet point 4

Policy SLE1: The proposal and any associated employment activities can be carried out without undue detriment to residential amenity, the highway network, village character and its setting, the appearance and character of the landscape and the environment generally including on any designated buildings or features (or on non-designated building or features of local importance) (Bullet Point 5).

Residential amenity

- 6.85 The nearest residential dwellings (sensitive receptors) that may be affected by the Proposed Development are located in Stoke Lyne, and directly to the east of the Site (Lone Barn).
- 6.86 The following elements have the potential to impact amenity and wellbeing of neighbours:
 - Noise;
 - Lighting, and
 - Air Quality.
- 6.87 The noise chapter in the accompanying the Environmental Statement assessed the potential noise generating activities of the proposal, including noise associated with traffic. It concluded that the proposal is expected to have a low impact on sensitive receptors and will preserve the existing amenity of neighbouring occupiers.
- 6.88 Lighting details accompany the planning application. Operational lighting is required throughout the development to provide minimum levels of lighting to complete activities safely, prevent crime and aid navigation through the Site. The lighting scheme will be designed with regard to the minimum lighting levels provided in the following documents:
 - CIBSE Lighting Guide LG6 The Outdoor Environment;
 - Association of Chief Police Officers (ACPO) guidance for safety and security, and



- BS EN 12464-2:2014 Light and Lighting Lighting of Work Places Part 2.
- 6.89 Lighting will be sensitively designed and located so to minimise light spill within and outside the Site. The External Lighting Layout and Illuminance Plot is shown on drawing 20962/E/1001 Rev P1. The illuminance plot demonstrates that there will be no light spill on the closest sensitive receptors.
- 6.90 An Air Quality Assessment (AQA) accompanies the planning application. The AQA assesses potential air quality impacts during both the operational and construction phases of the development.
- 6.91 The potential for construction activities to cause nuisance from dust is considered to have a low/negligible adverse impact. This potential adverse impact can be mitigated by the implementation of a Construction Management Plan (CMP). A Framework CMP is submitted as part of this planning application.
- 6.92 The AQA submitted alongside this Application assesses the impact of the Proposed Development on air quality. It found in the absence of mitigation the Site is found to have a 'Low Risk' in relation to dust soiling effects on people and property, human health and ecological impacts. Providing mitigation measures are implemented as outlined in the AQA residual effects from dust emissions arising from the construction phase are considered to be 'not significant'.
- 6.93 The AQA has also considered the operational effects of the Proposed Development and found the effects to be 'not significant'.
- 6.94 The nearest residential properties comprise one dwelling located to the east of the Site. No other residential properties are located within close proximity of either Site. The Parameters Plan requires the provision for a bund along the eastern boundary. The final noise attenuation measures will be defined at reserved matters stage and will ensure that impact on residential amenity is mitigated.
 - The Highway Network
- 6.95 The Environmental Statement and the associated Transport Assessment demonstrate that the Proposed Development can be carried out without undue detriment to the highway network. This is addressed further in the response to bullet point 6.
 - Village Character and its Setting
- 6.96 This impact of the proposal on village character and setting is addressed above.
 - Appearance and character of the landscape and the environment generally including on any designated buildings or features
- 6.97 A Landscape and Visual Impact Assessment (LVIA) accompanies this planning application. The LVIA provides a baseline assessment of the landscape character and visual amenity of the Site. The baseline establishes that; the Site does not lie within or contain any nationally or locally designated landscapes; there are few listed buildings in close proximity of the Site; and:



- Views from close quarters are generally only available from very small sections of busy road corridors and from very short sections of the local PRoW network immediately surrounding the Site;
- From most roads and footpaths beyond the immediate context of the Site, views towards the Site are filtered by intervening vegetation within a gently undulating landscape;
- Views from residential properties are generally limited to a single property immediately adjacent to the Site's eastern boundary, although with some potential views also being obtained from properties within Stoke Lyne. Beyond this, any middle distance to distant views of the Site are gained across gently undulating agricultural landscape and tend to be heavily filtered or fragmented by intervening vegetation, and
- Much of the wider study lies outside the visual envelope from where no views of the entire Site are possible.
- 6.98 The LVIA concludes that the relatively flat landscape of the Site, with most ground level views being filtered by intervening hedgerows and other vegetation, results in limited visibility from the surrounding area. The prominent road infrastructure of the A43 and the M40 corridors impact both in an audible and visual influence on the local tranquillity.
- 6.99 Views experienced by residential receptors in close proximity of the Site are generally screened by mature tree cover within the agricultural context, with middle distance views of the Site being screened by the intervening vegetation. Much of the wider study area lies outside the visual envelope where no views of the Site are possible. The low number of significant landscape and visual effects confirm the extent to which strategic planting incorporated into the Proposed Development would mitigate views, retaining and reinforcing the characteristic landscape fabric and pattern of the Application Site and assimilating the proposal, into the urban and rural landscape context.
- 6.100 The LVIA and the proposed mitigation measures shown on the illustrative landscape strategy plan which include areas of new trees around the edges of the Site, particularly to the east which will also comprise a bund, and new hedge planting within the Site, demonstrate that the Proposed Development meets the test at Bullet Point 5 of policy SLE1. The illustrative landscape and planting strategy will help integrate the development into the landscape and contribute to achieving local landscape character objectives, although some loss of openness and landscape features will result. The Proposed Development will have no significant adverse impact on the surrounding area.
- 6.101 The Archaeological and Heritage Assessment has considered the impact of the Proposed Development on designated and non-designated Heritage Assets within a 2km radius from the boundary of the Site. The assessment concludes that the Site does not contain any designated Heritage Assets, such as World Heritage Sites, Scheduled Monuments, Listed Buildings, Registered Parks and Gardens, registered Battlefields or Conservation Areas.
- 6.102 Heritage Assets within a 2km radius of the Site have been assessed in order to understand whether the Site forms part of their settings such that it contributes to their significance. It was determined that the Site is part of the setting of a single Heritage Asset (the Grade II* listed building Church of St Peter) but that it makes no contribution to the church's significance or to that of any other Heritage Asset.
- 6.103 The Heritage Assessment established that the Site contains no designated Heritage Assets and that it does not contribute to the heritage interest of any designated Heritage Assets or



- non-designated Heritage Assets in the wider landscape as part of their settings. It is concluded that the Proposed Development would not result in any adverse effects to any designated or non-designated Heritage Assets in the wider landscape.
- 6.104 The HER (archaeological) records a possible Iron Age 'banjo enclosure', as well as a possible Iron Age ring ditch within the Site. Archaeological remains within the Site related to Iron Age settlement activity would be of moderate archaeological interest but are unlikely to be of such high heritage value as to warrant preservation 'in situ' and their loss could be adequately mitigated through archaeological excavation. Well-preserved remains related to a Bronze Age ring ditch or barrow could be of greater significance, however, the evidence suggests that these are not present within the Site and, regardless, an isolated and denuded barrow would be unlikely to warrant preservation 'in situ' and, if demonstrated to exist, its loss could also be adequately mitigated through archaeological excavation.
- 6.105 The geophysical survey also identified evidence for medieval cultivation furrows and postmedieval quarry pits. Other sources suggest the presence of post-medieval boundary ditches within the Site. Archaeological features related to these would be of low or very low significance. Further information on the Site's potential for significant archaeology will be provided by additional geophysical surveys, including the area of the banjo enclosure, and trial trenching to a scope agreed in advance with the Council's archaeological advisor.
- 6.106 It is considered appropriate and reasonable that any significant archaeological features identified in the Site could be adequately dealt prior to development, through a programme of archaeological excavation (preservation through record), the scope of which would be defined through consultation with the Council's archaeological advisor and implemented via a condition attached to the planning permission.

The Proposed Development complies with bullet point 5

Policy SLE1: The proposal will not give rise to excessive or inappropriate traffic and will wherever possible contribute to the general aim of reducing the need to travel by car (Bullet Point 6).

- 6.107 The planning application is accompanied by a Transport Assessment (TA). The TA demonstrates that the Site has the following levels of accessibility by sustainable modes of transport:
 - With regard to cycling, it is considered that this mode of transport is an option for trips up to around 5km in length, which equates to a 20-minute journey time in an urban environment. The 5km distance in this location would mean that future employees could access by bicycle to local villages such as Stoke Lyne, Ardley and Bucknell;
 - The nearest bus station, Braeburn Avenue, Elmsbrook, Bicester is also within this 5km boundary (4.1km);
 - An existing bus service routes along the B4100 between the northern and southern parcels of the Site. The service is the 505, operated by Stagecoach. This route travels between Brackley to Bicester including a section along the B4100. The service also serves Bicester Village railway station (providing connections to Oxford and London) and the northern urban extension at Radstone Fields in Brackley, and
 - The closest railway station to the Site is Bicester North located 6.8km to the southeast of the Site. This station has bus services, including the 505 Stagecoach service that would allow employees to potentially travel towards the Site to Charlotte



Avenue bus stop, Elmsbrook (this is the closest bus stop to the Site that is also on the 505 route).

- 6.108 The Proposed Development also includes the following sustainable transport measures:
 - A new bus stop/layby will be provided to improve accessibility by public transport for future employees and visitors of the Site;
 - Public Transport Contributions to improved services; Car and cycle parking that is consistent with the standards and guidance;
 - Electric Vehicle charging points;
 - Car share spaces, and
 - Operating a Travel Plan that will encourage staff to make use of more sustainable modes of transport when travelling to/from the Site.
- 6.109 To the west of the Site, travel on foot or by bicycle from the Site to the nearby roadside services will also be supported through improvements committed through a National Highways scheme at Baynards Green Roundabout. Such development will include signals to allow for effective travel flow. There is also the opportunity for signals to be associated with toucan crossings that would allow pedestrians and cyclists to navigate the roundabout safely and access the nearby service stations.
- 6.110 As part of the Junction 10 M40 development (application references 21/03266/F, 21/03267/OUT and 21/03268/OUT), Oxfordshire County Council (OCC) has sought the provision of a new shared footway/cycleway towards Bicester. It is understood that the final form of this link will be confirmed following the outcome of further detailed discussions with OCC that will take into account the usual technical and viability assessments associated with any new piece of significant infrastructure. The B4100 cycleway is proposed to be a 3m wide with a margin between the path and the edge of the carriageway and will provide connections towards National Cycle Network (NCN) Route 51 within Bicester. NCN Route 51 is a long-distance cycling route which begins in Oxford, passing Milton Keynes, Bury St Edmunds and Ipswich before reaching the coast at Felixstowe.
- 6.111 The Transport Assessment (TA) has looked at the cumulative impact on traffic generation arising from committed developments and the associated traffic that is expected to pass through Junction 10. The TA concluded that the Proposed Development '...has also been shown that the quantum of development that is being applied for is unlikely to have a material impact upon the local transport networks. Indeed, the results of our various analyses indicate the Proposed Development will not have a severe impact from a highway capacity perspective in isolation or cumulatively with the committed developments.' and therefore will not give rise to excessive or inappropriate traffic as required by bullet point 6.
- 6.112 The Proposed Development complies with bullet point 6

Conclusion

- 6.113 The proposed layout and design of the development together with the supporting technical and environmental reports that accompany this planning application demonstrate that the Proposed Development satisfies the 7 bullet point criteria included in Policy SLE1, namely:
 - Bullet Point 1: The development is not located on land within the Green Belt.



- Bullet Point 2: It has been robustly demonstrated that there are no suitable and available sites within Category A Villages (within or on the village edge) or on allocated sites included in the CLP.
- Bullet Point 3: The building will be built to a very high standard using sustainable construction (see the Design and Access Statement for further details).
- Bullet Point 4: The scale of the development will have no significant impact on the character of nearby villages.
- Bullet Point 5: The proposals will have no adverse impacts on the residential amenity of nearby villages; the local highway network; the character and appearance of the local villages and landscape, or any designated or nondesignated heritages assets within 2km of the Site.
- Bullet Point 6: The development will not lead to excessive or inappropriate traffic.
- Bullet Point 7: There are no suitable plots or premises within existing nearby employment sites.
- 6.114 The development plan anticipated that employment development needs would ordinarily be met on allocated or committed sites but has acknowledged that 'exceptional circumstances' may exist justifying in principle the provision of employment on an unallocated site, i.e., the development plan envisages that sites may come forward on unallocated sites in rural areas. As set out above exceptional circumstances have been demonstrated and the proposed employment proposal, which is within the rural area and is a non allocated site, is in compliance with SLE1 as it then meets the 7 bullet point criteria. Therefore, the proposals are in compliance with the development plan.



7.0 ASSESSMENT OF THE PROPOSALS AGAINST OTHER DEVELOPMENT PLAN POLICY

- 7.1 The following section assesses the Proposed Development against other relevant planning policies (development plan and national policies).
 - Sustainable Design
- 7.2 The Application seeks outline planning permission with all matters reserved (except for access). The scale, layout, appearance and landscaping of the Proposed Development will be detailed within future reserved matters Applications which will be required to demonstrate compliance with the Parameter Plan.
- 7.3 The Parameters Plan controls the scale of the Proposed Development as well as the location of landscaping. The proposed buildings will have a maximum ridge height of 23m above finished floor level. The proposed massing is reflective of market requirements for logistics floorspace and will ensure that the Site's development potential is fully optimised.
- 7.4 The final size of each building will be determined at reserved matters stage. The buildings will be linked by areas of hard and soft landscaping, which will break up the massing, as well as offering advantages in terms of access and market suitability.
- 7.5 Significant areas of soft landscaping will be provided around the perimeter of the Site, in particular on the eastern boundary. Existing perimeter hedgerows will be retained and enhanced where possible and vegetation strengthened along sensitive boundaries.
- 7.6 The Proposed Development, the detail of which will be confirmed at reserved matters stage, will be of a high-quality design and construction; and will be energy efficient and resilient to climate change.
- 7.7 The Proposed Development will achieve at least BREEAM 'Very Good' standard in accordance with Policy ESD 3 of the Cherwell Local Plan. A sustainability statement has been prepared to demonstrate how this could be achieved.
- 7.8 Policy ESD 2 sets an energy hierarchy in seeking to achieve carbon emission reductions. At the top of the energy hierarchy is the 'reducing energy use', in particular by the use of sustainable design and construction measures. Level 2 of the energy hierarchy and Policy ESD 4 seeks to supply energy efficiently and to give priority to decentralised energy supply. The accompanying Sustainability Statement has assessed a range of renewable sources including District Heating, Combined Heat and Power and biomass fuelled Combined Heat and Power. The suitability of decentralised energy sources is dependent upon the building base load requirements for heat and power. The base load for the Proposed Development will not be sufficient to support decentralised energy systems.
- 7.9 Level 3 of the energy hierarchy and Policy ESD5 relates to 'making use of renewable energy'. An assessment of the potential to make use of renewable energy systems is included in the Sustainability Statement. PVs and air source heat pumps are the only viable and practical method of installing renewable energy within the energy supply strategy.
- 7.10 The Proposed Development will therefore comply with the NPPF and policies ESD 3 and ESD 15 of the Local Plan, which seek to ensure sustainable and high-quality design and that development is resilient to the impacts of climate change.



Landscape and Visual Impact

- 7.11 Planning Policy ESD3 of the CLP 2031 (Part 1) requires development to respect and enhance the local landscape character, securing appropriate mitigation where damage to the local landscape cannot be avoided. Policy ESD 15 of the CLP 2031 (Part 1) requires development to contribute positively to areas character and identity including respecting local topography and landscape features and trees. Saved Policy C28 requires control to be exercised over the layout, appearance and design to be sensitive to areas such as Conservation Areas, the AONB and areas of high landscape value.
- 7.12 The proposed mitigation measures shown on the illustrative landscape strategy plan which include areas of new trees around the edges of the Site, particularly to the east which will also comprise bunding, and new hedge planting within the Site, demonstrate that the Proposed Development. The LVIA concludes that:

"The landscape within the study area is predominantly flat to the north and gently undulating to the east, containing a mix of rural features and peri-urban uses, resulting in limited opportunities for views of the Site. In consideration of the impacts on the visual amenity of people, views towards the Site are often obscured by mature landscape features within a flat and gently undulating landscape. The assessment finds that, due to this visual screening, there would be limited long-term impacts on publicly accessible areas, including highways and PRoW.

Significant residual impacts are predicted for receptors using PRoW in close proximity to the Site, as well as residents in close proximity to it; and where the property may afford a view looking west as many are well contained by mature landscape features.

In the wider context, the low number of significant landscape and visual effects confirm the extent to which strategic planting incorporated into the proposed development would mitigate views, retaining and reinforcing the characteristic landscape fabric and pattern of the Site and assimilating the proposed development, as far as possible, into the peri-urban and rural landscape context."

- 7.13 Notwithstanding this, an illustrative landscape strategy has been prepared to mitigate the potential landscape and visual impacts of the development and to provide an attractive setting for future occupiers, which will guide and inform all future reserved matters Applications. The proposed landscape and planting strategy will help integrate the Proposed Development. Planting will comprise locally native species or species that reflect the landscape character.
- 7.14 A buffer of a minimum of 45.375 metres wide will be established along the eastern boundary of the Site (at its widest the buffer will be over 200 metres wide). This will connect to the existing woodlands to the north and south and provide significant visual screening along the eastern boundary for the proposed built development.
- 7.15 Accordingly, the Proposed Development will result in non-significant effects on landscape character. The proposed landscape and planting strategy will help integrate the development into the landscape and contribute to achieving local landscape character objectives, although some loss of openness and landscape features will result.
- 7.16 In accordance with Policy ESD 13 of the Cherwell Local Plan, the Proposed Development has sought opportunities to enhance the character and appearance of the surrounding landscape. The Proposed Development will secure appropriate mitigation and will not cause



undue harm to important natural landscape features and topography; impact on areas judged to have a high level of tranquillity, harm the setting of settlements, buildings, structures or other landmark features or harm the historic value of the landscape.

Transport

- 7.17 A Transport Assessment has been prepared to accompany the Application and is appended to the Environmental Statement.
- 7.18 During the construction phase, it is proposed that the effects of construction vehicles will be managed by a Construction Traffic Management Plan (CTMP). The CTMP will include a range of measures, defining temporary construction vehicle access and limiting lane closures / vehicle movements during peak travel hours. The greatest change in traffic during the construction will be on the A43, to the west of the proposed Site access, with daily flows increasing by less than half of one per cent (if used by all vehicles), and HGVs increasing by approximately two per cent. This represents the 'worst-case' scenario, i.e., should all construction activities take place at the same time. The significance of transport effects from construction activities is assessed as negligible.
- 7.19 The B4100 and the M40 on-slips and off-slips are where the greatest percentage increase is predicted. It should be noted that the large percentage change is from a relatively low baseline on the B4100 to the north west of the proposed Site access (a daily average of 555 HGVs).
- 7.20 During operation, the assessment has considered the effects in the year 2025, when the development would be operational. Peak hour operational assessments at a number of junctions on the local network in the future assessment years of 2025 and 2031 show there is no material increase to driver delay on the road network. The effects of the Proposed Development on road user safety is predicted to be minor.
- 7.21 It is proposed to create a bus stop and layby in the vicinity of the proposed Site access. This will be supported by pedestrian crossing facilities across the B4100. The Proposed Development will provide a safe environment on footways and cycleways within the Site, with connections to the proposed shared pedestrian / cycle link along the B4100, proposed to be delivered by Albion Land as part of the Junction 10 M40 scheme.
- 7.22 As part of the proposals, a Travel Plan will seek to encourage employees to travel by alternatives to the private car, to facilitate travel by bus, and by cycling. In addition, there are a number of electric vehicle parking spaces proposed.
- 7.23 Policy SLE4 of the CLP 2031 Part 1 requires that new developments maximise opportunities for access to sustainable modes of travel and seek improvements to the highway network to mitigate significant adverse impact of traffic generation.
- 7.24 As set out above in paragraphs 6.108 to 6.122 above, the Proposed Development will promote sustainable modes of transport in accordance with Section 9 of the NPPF. The proposed Site access will include pedestrian and cyclist infrastructure, whilst segregated pedestrian/cycle routes will be provided within each Site.
- 7.25 Off-site measures are also proposed to encourage active travel to each Site and will be secured through the S106 and S278 Agreements.



- 7.26 The Proposed Development will therefore encourage active and sustainable modes of travel in accordance with section 9 of the NPPF and Cherwell Local Plan.
- 7.27 Given the type of development proposed and its location, the Proposed Development proposes appropriate opportunities to promote sustainable transport modes and will provide safe and suitable access for all users to both Sites in accordance with paragraph 109 of the NPPF and Policy SLE 4 of the Cherwell Local Plan.

Biodiversity

- 7.28 Policy ESD10 of the CLP lists measures to ensure the protection and enhancement of biodiversity and the natural environment, including requirement for relevant habitat and species surveys and associated reports to accompany planning applications which may affect a site, habitat or species of known ecological value.
- 7.29 Policy ESD11 is concerned with Conservation Target Areas (CTAs) and requires all development proposals within or adjacent to CTAs to be accompanied by a biodiversity survey and report identifying constraint and opportunities for biodiversity enhancement.
- 7.30 The planning application is accompanied by an Extended Phase 1 survey and detailed (Phase 2) surveys relating to breeding birds, roosting and foraging/commuting bats, otter, water vole, badger, reptiles, great crested newts, and hairstreak butterflies.
- 7.31 There are no internationally designated sites within 10km. There is one biological statutory designated site within 5km of the Site, Ardley Cutting and Quarry Site of Special Scientific Interest (SSSI), although given the distances involved and separation by the M40, it is not considered there would be any negative impacts on this SSSI as a result of the Proposed Development.
- 7.32 There are four non-statutory designated Local Wildlife Sites (LWS) within 2km of the Site: Stoke Bushes LWS, Stoke Wood LWS and Stoke Little Wood LWS and Tusmore and Shellswell Park Biodiversity Opportunity Area (BOA). Of these, only Stoke Bushes LWS and the Shellswell Park BOA is considered, in the absence of appropriate mitigation, to be at risk of adverse effects as a result of the Proposed Development.
- 7.33 The majority of the Site comprises large, intensive arable fields sown with commercial cereal crops that are of negligible ecological importance. The arable fields are enclosed by a network of native hedgerow with a number of associated mature trees that are of Site to Local Ecological Importance.
- 7.34 In terms of Protected and Priority Species, surveys have confirmed the presence of populations of breeding birds, foraging/commuting bats, badgers and brown hairstreak butterfly (Thecla betulae) within the Site.
- 7.35 Chapter 8 Ecology of the ES assessed the impact of the Proposed Development at the construction and the operational phases of the Proposed Development. The ES concluded that with mitigation in the form of a Construction Environmental Management Plan (CEMP), and the Ecological Construction Method Statement (ECMS), the impact during the construction phase on the designated sites, habitats and vegetation, fauna, and species will be negligible. Chapter 8 of the ES sets out additional mitigation measures required during the construction phase.



- 7.36 The parameters plan ensures that a minimum of 17.24ha, 20.70% of the site area, will be devoted to open space and managed for biodiversity purposes. Additional landscaping and open space will also be provided within the developable area once final site layouts are fixed at Reserved Matters stage, further increasing the biodiversity potential of the proposals.
- 7.37 Aspects of the detailed design which are especially relevant and can be secured through a suitably worded planning condition are: lighting designed to avoid impacts on nocturnal wildlife, the surface water drainage system designed to maintain/improve water quality, maintain existing run-off rates and provide additional wetland habitat; and the soft landscape scheme designed to include new habitats of ecological value within the green infrastructure.
- 7.38 The planting of new native trees, shrubs, woodland and hedgerows along the eastern boundary will also serve to connect offsite habitats via new foraging and commuting routes for a range of wildlife. The establishment and long-term management of these habitats will offset the losses to development and seek to result in an overall net gain in habitat of biodiversity value. Furthermore, the proposed new planting will enhance the connectivity between Stoke Bushes LWS to the northeast and the woodland adjacent to the south of the Site through new tree, scrub, hedgerow and woodland habitats, thereby strengthening the integrity of the local ecological network.
- 7.39 During the operational phase, with mitigation, the impact on the designated sites, habitats and vegetation, fauna, and species will be negligible.
- 7.40 The Proposed Development is therefore consistent with paragraph 174 (part d) of the NPFF and Policy ESD 10 of the CLP 2031, which require development to contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity. A Biodiversity Net Gain will be achieved and existing features of nature conservation within the Site will be retained and enhanced where possible.

Flood Risk

- 7.41 Policy ESD6, ESD7 of the CLP 2031 together resist new development where it would increase flood risk or be unduly vulnerable to flooding. The policy also seeks to ensure that the proposals incorporate sustainable drainage systems in order to prevent increased risk of flooding.
- 7.42 The Environment Agency's flood map indicates that the majority of the Site is located within flood risk zone 1 and therefore has a low probability of fluvial flooding, with less than a 1 in 1000 year annual probability of flooding.
- 7.43 A Flood Risk Assessment (FRA) accompanies the submission of the planning application. The flood resilient design of the Site's drainage, through the implementation of a Sustainable Urban Drainage Strategy (SuDS) will ensure that the Proposed Development can come forward without increasing the risk of flooding, either on the Site, or to the surrounding area.
- 7.44 The Proposed Development will have no impact on the movement of floodwater across the Site; there will be no increase in the floodwater levels due to the Proposed Development. The Proposed Development creates the opportunity to improve the surface water drainage and risk of flooding within the locality. Through the implementation of SuDS, the exposure of people and property to flood risk will be reduced and minimised compared to existing Site conditions.



7.45 The Proposed Development complies with polices ESD 6 and 7 of the CLP 2031.

Agricultural Land

- 7.46 Footnote 58 of the NPPF states that where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality. The best and most versatile agricultural land is defined in the NPPF as 'land in Grades 1, 2 and 3a of the Agricultural Land Classification'.
- 7.47 The Agricultural Land Classification report accompanying the application states that the land comprises moderate quality (subgrade 3B) agricultural land. The Agricultural Land Classification report further explains that the majority of land within Oxfordshire and Cherwell is either Very Good (Grade 2) or Good to Moderate (grade 3) agricultural land. In Cherwell this accounts for 67% of land, which is significantly higher than the national average.
- 7.48 The Proposed Development will help address a substantial and growing need for new logistics floorspace at the national, regional (East Midlands and South East) and local (M40 corridor) level. The accompanying Logistics Market Assessment and Land Availability Report explains that there are no other suitable sites that could accommodate the Proposed Development, and there are very few sites nationally which benefit from such good links to the strategic highway network (which is a fundamental requirement of logistics operators). Accordingly, the loss of agricultural land is necessary in this instance.
- 7.49 The Proposed Development will result in the loss of moderate quality (subgrade 3B) agricultural land, which is widespread within Cherwell and Oxfordshire as a whole. No best and most versatile agricultural land will be lost. As the sub-grade 3B land represents some of the poorest quality land available within the District, the Proposed Development will not significantly harm national agricultural interests and is broadly consistent with the NPPF.

Ground Conditions

- 7.50 No obvious sources of contamination have been identified through a desk study, walkover and site observations. All of the testing undertaken on the soils as part of the investigation did not reveal any contaminants elevated above the relevant screening criteria. On this basis, the risk assessments have established a negligible to low risk to human health and controlled water receptors. Remedial actions are therefore not considered necessary. Special ground gas measures are also unlikely to be required.
- 7.51 The Proposed Development is therefore fully consistent with paragraph 183 of the NPPF, which states that planning decisions should ensure that a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination.

Noise

- 7.52 Saved Policy ENV1 (Development likely to cause detrimental levels of pollution), seeks to ensure that the amenities of the environment and in particular the amenity of residential properties are not unduly affected by development.
- 7.53 As set out above, mitigation measures can be implemented to reduce noise levels at the relevant receptor. These mitigation measures will reduce noise to acceptable levels and no significant effects are expected on the receptors following implementation of this mitigation.



The Proposed Development has therefore considered the amenity of existing development in accordance with Policy ESD 15 of the CLP.

Air Quality

- 7.54 As set out in Section 6 above, measures to mitigate dust emissions will be required during the construction phase of the development in order to minimise effects upon nearby sensitive receptors. The implementation of the identified mitigation measures will ensure that the cumulative effect of construction activities on air quality will be 'not significant'. The operational impacts on human health of both developments will be 'not significant'.
- 7.55 In regards to ecological receptors, the air quality assessment has assumed a worst-case assessment and does not take account of any mitigation measures that may be implemented during the development's operation. It is considered that any planning permission could include an appropriately worded condition which requires an air quality assessment (to assess the impact of the development on the Ardley Cutting and Quarry Site of Special Scientific Interest (SSSI)) to be undertaken with the submission of a reserved matters application.
- 7.56 Taking account of the small contribution of traffic emissions on the SSSI from the development and that a further assessment would be undertaken at reserved matters stage, it is considered that the effects of the Proposed Development on the Ardley Cutting and Quarry SSSI are not significant.
- 7.57 The Proposed Development is therefore consistent with paragraph 186 of the NPPF, which requires proposals to mitigate their impact on air quality.

Climate Change

- 7.58 Policy ESD1 seeks to: locate development in the most sustainable locations; to reduce the need to travel and encourage sustainable forms of transport as well as, including climate change mitigation and resilience in design approaches.
- 7.59 The Proposed Development will result in carbon emissions during construction. The development will use the 'Net Zero Carbon in Construction' approach to reduce carbon emissions as much as feasibly possible. If, following this, there are any residual construction related carbon emissions, these will be offset through the funding of verified and accredited offset schemes, in line with principals set out in UKGBC's net zero framework. Consequently, in terms of construction impacts, the development will be Net Zero Carbon in construction.
- 7.60 To mitigate for the anticipated operational energy related emissions, the Proposed Development will use the 'energy hierarchy' to reduce carbon emissions from the built development: by minimising heat losses, reducing air permeability, maximising the use of natural light; maximising the energy efficiency of the fittings and equipment that is incorporated into the development; and to incorporate renewables / low carbon technology. Solar panels (PVs) would be installed over a minimum of 18% of the useable roof area. This will provide the normal base load of electricity prior to including any specific requirements of the occupier.
- 7.61 The Proposed Development at each Site will also incorporate a range of climate change resilience measures as set out within the Environmental Statement. The Proposed Development is therefore consistent with paragraph 154 of the NPPF and policy ESD 1 of the Cherwell Local Plan, which requires new development to avoid increased vulnerability to the



range of impacts arising from climate change, and to include suitable adaptation measures so that it is more resilient to climate change impacts.

Heritage

- 7.62 Policy ESD 15 of the CLP 2031 requires appropriate information and assessments to be included within the application submission, to enable an assessment to be made of the potential impact of a development upon them. Saved Policies C18 and C25 of the adopted CLP 2031 are also relevant in terms of seeking to protect the setting of listed buildings and scheduled ancient monuments
- 7.63 As set out in Section 6 above, archaeological remains of high significance that could preclude development are unlikely to be present at the Site. It is therefore considered that any further archaeological works can be reasonably secured by an appropriately worded planning condition. The location, timing and extent of any archaeological mitigation will be discussed and agreed with the Council's archaeologist.
- 7.64 Heritage Assets within a 2km radius of the Site have been assessed in order to understand whether the Site forms part of their settings such that it contributes to their significance. It was determined that the Site is part of the setting of a single Heritage Asset (the Grade II* listed building Church of St Peter) but that it makes no contribution to the church's significance or to that of any other Heritage Asset.
- 7.65 No built heritage effects are anticipated at the operational stage and no further mitigation measures are required. The Proposed Development is therefore consistent with Section 16 of the NPPF and Policy ESD 15 of the CLP 2031, which requires development to conserve and sustain designated and non-designated Heritage Assets.

How the Development Contributes to Sustainable Development

- 7.66 Central to both local and national planning policy is the commitment to sustainable development. The NPPF includes three objectives in achieving sustainable development: the economic objective; the social objective; and the environmental objective.
- 7.67 The following table summarises how the Proposed Development meets these objectives.

Table 4: How the Proposals Contributes to Sustainable Development

Economic Objective	Capital Investment into the economy;
	Indirect investment in local construction companies;
	 Operational: Net GVA generation of £148m per annum to Oxfordshire's economy, and
	• The Proposed Development will generate business rates, which can be invested in local services and infrastructure.
Social Objective	The construction of the Proposed Development is anticipated to create a net addition of 610 jobs;
	• The operation of the Proposed Development is expected to create up to 2,430 jobs;
	Creation of a range of skilled and unskilled jobs;
	Open space provision;
	 Improvements to cycle routes to enable/encourage staff to cycle to work to assist in maintaining good levels of health of the workforce, and



	 Provision of cycle parking and showers to enable/encourage staff to cycle to work to assist in maintaining good levels of health of the workforce.
Environmental Objective	 Improved infrastructure to reduce the impact of trips generations, reduce the impact of traffic on the local highway, and reduce pollution; Improved cycle infrastructure: internal and provision of shared pedestrian/cycle path; Car and cycle parking that is consistent with Council standards and guidance; Operating a Travel Plan that will encourage residents to make use of more sustainable modes of transport when travelling to/from the Site; Ecology – provision of a net gain in biodiversity. The parameters plan ensures that a minimum of 17.24ha, 20.70% of the site area, will be devoted to open space and managed for biodiversity purposes; The Proposed Development is resilient to climate change, through for example use of SuDS and being built to high sustainability standards; Including SuDS will ensure that the Site will manage its surface water drainage in a sustainable manner, designed with additional capacity (40%) to ensure that the development will not increase the risk of flooding in the Site or surrounding area; Achieve a minimum EPC rating A; Be delivered to 'net zero carbon in construction' to accord with the UK Green Building Council's definition; Achieve a rating of BREEAM 'Very Good' (as a minimum) upon completion; Incorporate substantial on Site renewable energy generation through solar PV coverage on the roof, and Provide Electric Vehicle charging points for staff and visitors.
	1 To the Electric vernice charging points for stair and visitors.

7.68 It is acknowledged that the development will involve the loss of greenfield land; some trees and lengths of hedgerow (which are categorised in the Ecological Appraisal). These losses have to be set into context with proposals for new landscaping. It is anticipated that within the developed part of the Site and the structural landscaping, significant numbers of trees and hedgerows will be planted. The loss of the trees and hedgerows is considered not to be significant in the context of the proposals for extensive landscaping.



8.0 CONCLUSION

- 8.1 The development management considerations contained within the Development Plan, including the aspirations for high-quality and sustainable design, have informed the Parameter Plan.
- 8.2 The potential impacts of the Proposed Development on the local highway network, flood risk and drainage, biodiversity, designated Heritage Assets, trees, landscape and visual amenity, noise and air quality have all been assessed as part of the application.
- 8.3 It is demonstrated that the development would not have any adverse effects on the built or natural environment that cannot be minimised and mitigated to an acceptable level. In summary, the Proposed Development will provide high-quality logistics floorspace in a location that is highly accessible to the strategic road network.
- 8.4 The Proposed Development will help address an urgent and substantial need for logistics floorspace and is supported in principle by the National Planning Policy Framework. The development will create a range of substantial economic, social and environmental benefits and will contribute to a various objectives of the Development Plan.
- 8.5 It has been demonstrated that the Proposed Development will not compromise the Council's employment strategy and the delivery of the employment strategic sites included in the development plan.
- 8.6 Paragraph 11 of the NPPF states that plans and decisions should apply a presumption in favour of sustainable development sites. For decision making this means that a proposal accords with an up-to-date development plan should be approved without delay.
- 8.7 Policy SLE1 is responsive to situations where economic development is not able to be accommodated on committed employment, and in consequence the release of an unallocated site may be justified. The detailed Site assessment robustly establishes that this investment or need cannot be accommodated on any land committed for employment development, or within or on the edge of the Category A Village. No urban land stands idle which might accommodate this scale of development.
- 8.8 In these circumstances it is necessary to demonstrate exceptional circumstances (which have been demonstrated above) to justify releasing an unallocated site for new economic development and to demonstrate that the criteria of Policy SLE1 are satisfied. It is submitted that the policy tests of SLE1 have been fully satisfied, and that the proposals comply with other relevant polices from the Local Plan. The Proposed Development is considered to be compliant with the development plan read as a whole.
- 8.9 If the Council considers that this proposal is not compliant with provisions of a relevant policy, then an assessment has to be made as to the degree of any conflict and its significance when reading the Development Plan as a whole. Should there be policy conflict with the provisions of the Development Plan, it does not mean that an application has to be refused planning permission. The planning system is plan-led not plan determined. Material considerations such as the socio-economic benefits from this proposal would have to be weighed against the identified policy conflict. A decision then has to be made as to where in considering sustainable development, the overall public interest lies.
- 8.10 The Council would be entitled to make a decision in favour of this proposal even if the Proposed Development is considered to be in conflict with the development plan.



8.11 The Proposed Development is considered to accord with policies contained within the development plan specifically policy SLE1 which is most relevant to the Proposed Development. It will result in economic benefits within the surrounding area including increased spending and the creation of new jobs. On this basis it is felt that the proposals should be supported by officers and members alike.

PF/10679

APPENDIX 1 – SITE SEARCH (STRATEGIC AND COMMITTED SITES)

Site Availability in Cherwell District Council

- 1. The following sets out the assessment of the Site Search as required by Policy SLE1.
- 2. A need for a site of 10 Ha in order to accommodate the proposed development (it is likely that 20 Ha is required but to ensure a robust assessment 10 Ha has been assessed).

<u>Site Search – Strategic Sites</u>

3. Table 1 below sets out the strategic employment sites allocated within the Cherwell Local Plan 2015-2031 (Part 1). The suitability and availability of each of the strategic employment allocations to accommodate the proposals has been assessed.

Table 1: Cherwell Local Plan 2011-2031 – Allocated Strategic Employment Sites

Policy	Site	Included in Site Assessment	Comment
Bicester Al	located Site	7.00000	
Bicester (BIC1)	Bicester Planning Policy North West Bicester Eco- Town	Yes	Marketing name: Axis 9, Bicester Developer: Albion Land Site area:10ha. The site is now fully developed with the last two units about to be completed and now let to Arrival and The Menu, both local occupiers As the site is fully developed, it is not large enough to accommodate the proposals.
Bicester (BIC2)	Graven Hill	Yes	The employment land extends to 26ha. The scale of the remaining land, 18.68ha, after the parcel of land for the approved Barrus development (c7.32ha) has been deducted. The irregular shape of the site would struggle to accommodate the proposals at Ardley.
Bicester (BIC4)	Bicester Business Park	Yes	Site Area: 29.5ha. No available supply for B8. Now known as Bicester Office Park. The site is allocated for B1a(offices) and therefore not allocated for B8 uses. The remaining 13.01ha has an irregular shape making it difficult to accommodate the scale of the proposals.
Bicester (BIC10)	Bicester Gateway/Cataly st Bicester	Yes	The site area is 18ha. Use class B1 Business Uses. High tech knowledge industries. No available supply of B8 space. The site is already majority developed by Albion Land.
Bicester (BIC11)	Employment Land at North east Bicester	Yes	The site is known as Link 9 and is fully built out with no available allocated employment land.
Bicester (BIC12)	South East Bicester	Yes	23.15ha of employment land - 6.66ha available as part of the consented Wretchwick Green site and 16.49ha that forms the Symmetry Park logistics park. Symmetry

			Deals to shade thates A4 and A2 / 10 to to 2
			Park include Units A1 and A2 (occupied) Units B (currently being fitted out by OCADO), which leave 6.75ha of remaining land which is being built out as a 270,000 sq ft unit. Neither the undeveloped land within Wretchwick Green (6.6ha) nor Symmetry Park (6.7ha) are large enough to accommodate the proposals.
Banbury Allo	ocated Site		
Banbury (BAN6)	Banbury 6: Employment Land West of the M40	Yes	Also known as CM40, the employment land has now been fully built out and let to occupiers including Pro Drive and Arrival. The remaining 10.3ha of undeveloped land within the allocation is located within Flood Zone 3b where development is precluded. This land has been reserved for biodiversity mitigation for the adjoining development located within South Northamptonshire Council.
Banbury (BAN15)	Employment Land North East of Junction 11	Yes	This strategic site to the east of the M40, extends to 13ha and is allocated for mixed employment use. Planning permission was approved in July 2020 for commercial development (19/00128/HYBRID) for up to 33,110sqm of flexible Use Class B2, B8 and ancillary B1 office (Full for up to 2 units) and up to 16,890qm of flexible Use Class B2, B8 and ancillary B1 office (Outline Planning Permission for up to 2 units). Construction has commenced for the 2 units subject to the approved full part of the HYBRID application. The remainder of the site, the outline planning application area, has 2.7 hectares of developable area as set out in the submitted Design and Access Statement and therefore, the scale of the remaining site, would not accommodate the proposals.
Rural Areas			accommodate the proposition
Villages 5	Former RAF Upper Heyford	Yes	Employment on the allocation will be provided by the retention of the existing buildings already in commercial use. These include buildings on the historic air field that lies within a Conservation Area and would not be appropriate for re-use/demolition for the proposals in addition to being too small to accommodate the proposals. The allocation includes a further 13.4ha of employment land.
			New large B8 proposals would not be considered compatible with Heritage/Conservation Area.

4. Taking in turn each of the sites to be assessed:

North West Bicester (Albion Land) (Planning Policy Allocation BIC1)

5. This is a new zero-carbon mixed use development totalling 390 ha of land, 10 ha of total land allocated expected to provide for employment uses within the Plan period. Outline planning permission was submitted by Albion Land and granted on appeal (APP/C3015/W/16/3163551) for a mixed-use development of residential and B1, B2 and B8 on land off Howes Lane, known as Axis 9,

2

Symmetry Park Ardley Appendix 1 Site Search Framptons Town Planning

April 2022 PF/10679

Bicester. A further planning application was submitted May 2017 for the employment provision and approved in September 2017 (17/01090/OUT).

6. The site has been fully developed in two phases. The Reserved Matters for Phase 1 that includes the south eastern half of the site was approved in September 2018 (19/00347/REM). The layout includes 5 large scale and 7 small scale units which have all been let/sold. All 10ha of land allocated for employment use has been approved and construction has commenced. Phase 1 and 2 are complete and Phase 3 is under construction and is now also let to Arrival and The Menu.

The employment site at North West Bicester is not available for the proposals.

Graven Hill (Planning Policy Allocation BIC2)

- 7. Planning approval was granted for the redevelopment of the former Ministry of Defence (MoD) site to the west of Bicester in October 2011 (11/01494/OUT). The development consists of a mixed-use scheme comprising 1,900 dwellings, primary school, community hall and local centre, public house, 2,160 sqm of B1 (b), 2,400 sqm of B1 (c), 20,520 sqm of B2, and up to 66,960 sqm of B8 employment space. The MoD is undergoing a phased withdrawal of its operations as redevelopment of the site takes place.
- 8. A planning application was submitted in 2018 (18/00325/OUT) to vary several conditions of the approved scheme. A further planning application was submitted in August 2019 to vary conditions 2 (plans) and 28 (phasing) of Planning Approval 18/0325/OUT. The planning application was in direct response to Barrus seeking to move into Units D1 and D4 in the Graven Hill Site in July 2020. The planning application was approved in January 2020.
- 9. The original outline planning permission refers to the provision of a new junction to the employment site (known as the Perimeter Road) and a realignment of the existing access road, the southern relief road within the site. The provision of both are uncertain at the moment; delay in the provision of this infrastructure could further delay the development of the employment land meaning there is no certainty that the operational deadline for the development is achievable.
- 10. Further, the amount of Use Class B8 included within the approved outline planning application that sets the parameters in which the site will be developed (11/01494/OUT) includes 66,960sqm (720,751 sqft) of Use Class B8. The scale of the proposed Use Class B8 within the overall site would therefore not accommodate the proposals at Ardley.
- 11. The approved employment land extends to 26ha. The area of the site that has approval for the Barrus site extends to 7.32ha. The irregular shape of the site would struggle to accommodate the proposals at Ardley.

The employment land within Graven Hill site allocation is too small to accommodate the proposals.

Bicester Business Park (Planning Policy BIC4)

12. The site area extends to 29.5ha and is now known as Bicester Office Park. Policy BIC includes B1 (a) office use, with up to 6,000 jobs being created. Nearly half of the allocation has already been permitted and built out, and includes the Tesco superstore and surface water attenuation for Bicester Village.

- 13. Outline planning permission was granted in May 2020 for office development and research and development floorspace (17/02534/OUT) on a 13.1ha parcel of land to the south and east of the A41 and Oxford Road, adjacent to the Tesco superstore. The majority of the floor space approved was for the allocated B1(a) (office) with a small amount of floor space for B1 (b) (Research and Development). This development is anticipated to generate between 2600 and 4000 jobs dependent on the nature of the future occupants and the extent of Use Class B1 (b) development. The quantum of job generated is much less that anticipated from the allocation policy (6,000).
- 14. The proposals Use Class B2 would be contrary to Policy BIC4 and would have to be justified. It is unlikely that the Council would support Use Class B2 within this allocation, bearing in mind the reduced anticipated job creation from the BIC4 allocation as a whole, that has been further reduced by the mixed-use Tesco approval.

The employment land at Bicester Business Park is too small to accommodate, and is not suitable for the proposals.

Bicester Gateway (BIC10)

- 15. The site area is 18ha and is allocated for B1 use with an anticipated creation of 3,500 jobs. The site has permission for a hotel that has been constructed (17/02557/REM). The remaining land (Phase 2) was granted planning permission for B1 development and a Health and Racquets Club in May 2020 (19/01740/HYBRID). The site extends to 15.8ha of which 6.6ha accommodates the Health and Racquets Club. To compensate for the loss of B1 floor space, a further planning application was approved in May 2020 (19/01746/OUT) for 4.6ha of B1 employment space.
- 16. As is the case for Bicester Business Park, the proposals Use Class B2 would be contrary to Policy BIC10 and would have to be justified. It is unlikely that the Council would support a Use Class B8 on this site due to the impact of the reduced job generation.

The remaining employment land at Bicester Gateway is too small to accommodate, and is not suitable for the proposals.

Employment land at North East Bicester (BIC11)

17. The site extends to 15ha. Outline planning permission was approved for 48,308sqm of employment land (Use Class B1, B2 or B8) (15/01012/OUT). Two Reserved Matters applications (17/0712/REM and 17/01289/RM) for the eastern part of the site have been approved and 9 small scale employment units have been built out. A further planning application (18/00584/RM) for the remainder of the western part of the site for a further 2 units (Unit 1A 11,479sqm and Units 1B 15,982sqm) has been approved and are under construction.

The remaining employment land at North East Bicester is too small to accommodate the scale of the proposals.

South East Bicester (Planning Policy Allocation BIC12)

Wretchwick Green

- 18. Planning Policy (BIC12) includes a mixed-use development of 1,500 dwellings and 40ha of employment space known as Wretchwick Green and has a resolution to grant planning permission subject to the signing of the S106 agreement (16/01268/OUT).
- 19. Policy BIC12 includes the following Use Classes B1, B2 and B8 (primarily B8 uses). The quantum of employment development included within the Policy has been significantly reduced from 40ha to 23.15ha as shown on Table 4 below.

Table 2: Bicester 12 Policy Requirement

Bicester 12 Employment Provision					
Bicester 12 Policy Requirement	40 ha				
Wretchwick Green (16/01268/OUT) (resolution to grant)	6.66 ha				
Symmetry Park Phase 1 (consented and partially	16.49 ha				
constructed/occupied)					
Total Current Provision	23.15 ha				
Deficit of employment provision	16.85 ha				

The scale of the employment land included in the approved Wretchwick Green site subject of the resolution to grant application 16/01268/OUT (6.66ha) is not large enough to accommodate the proposals.

Symmetry Park

April 2022

- 20. Tritax Symmetry has been working with the Council to bring forward almost all of the remaining employment land allocated within the policy (16.49ha) approved under the outline planning permission 16/00861/HYBRID (up to 62,708sqm of B8 employment floor space). The employment site is separated into Zone 1 that benefits from full planning permission and Zone 2 from outline planning permission. The units within Zone 1, Unit A and Unit A1, have been constructed and are occupied.
- 21. A planning application (18/00091/F) was approved in July 2018 for Unit B within Zone 2 comprising 14,200sqm of logistic floor space within Use Class B8, 929sqm of ancillary B1 (a) offices and associated infrastructure. A further planning application for Unit B that included changes to the yard area to facilitate OCADO was approved in March 2021. Works are progressing, OCADO will be occupying Unit B shortly.
- 22. The remaining land to be developed extends to 6.75ha and benefits from 2 extant planning approvals for a single Unit C (24,898 sqm) and an alternative scheme for two smaller units, Unit C1 and C2 (15,267sqm and 7,719sqm). The larger Unit C (24,898 sqm) is now under construction. The scale of the site and the approved units will not accommodate the proposals.

The remaining employment land at the Symmetry Park site, is too small to accommodate the scale of the proposals.

PF/10679

Employment Land West of the M40 (Banbury 6)

- 23. This strategic site is located to the east of Banbury and extends to 35ha of mixed employment land and includes the erection of up to 115,107sqm of either Use Class B8 or a mixture of Use Class B2 and B8. The site has either been built out, occupied or under construction.
- 24. The remaining 10.3ha of undeveloped land within the allocation is located within Flood Zone 3b where development is precluded. This parcel of land has been safeguarded for biodiversity mitigation.

The employment land west of the M40 has been built out, occupied or under construction and so not available. The remaining 10.3ha of land (safeguarded for biodiversity gain) is not suitable or available for development.

Employment Land North East of Junction 11 (Banbury 15)

- 25. This strategic site to the east of the M40, extends to 13ha and is allocated for mixed employment use. Planning permission was approved in July 2020 for commercial development (19/00128/HYBRID) for up to 33,110sqm of flexible Use Class B2, B8 and ancillary B1 office (Full for up to 2 units) and up to 16,890qm of flexible Use Class B2, B8 and ancillary B1 office (Outline Planning Permission for up to 2 units).
- 26. Construction has commenced for the 2 units subject to the approved full part of the HYBRID application. Construction has commenced for the 2 units subject to the approved full part of the HYBRID application. The remainder of the site, the outline planning application area, has 2.7 hectares of developable area as set out in the submitted Design and Access Statement and therefore, the scale of the remaining site, would not accommodate the proposals.

The remaining employment land included within the allocation north east of Junction 11 is too small, and not available to accommodate the proposals.

Former RAF Upper Heyford (Villages 5)

- 27. This is a mixed-use allocation of 520ha that includes a small area of around 120,000sqm metres of employment use. A Hybrid planning application submitted in May 2018 (18/00825/HYBRID) has a resolution to grant planning permission subject to a S106 agreement.
- 28. Most of the employment on the allocation will be provided by the retention of the existing buildings in commercial use. These include buildings on the historic air field that lie within a Conservation Area and would not be appropriate for re-use/demolition for the proposals.
- 29. The allocation includes a further 13.4ha of employment land. The proposed development includes up to 35,175sqm of employment space, consisting of 6,330sqm of Use Class B1a Office, 13,635sqm of Use Class B1 b/c, 9,250qm of Use Class B2 and 5,960sqm of Use Class B8.

The B8 employment land included within the allocation is too small to accommodate the proposals.

30. There are a further 5 employment sites that are allocated within the Non-Statutory Local Plan 1996. The sites are too small to accommodate the proposals.

- Banbury Cross Business Park (0.4 ha)
- Land east of railway/north of Waterworks Lane, Banbury (2 ha)
- Bicester Park, Aura Brooks Phase 2 (0.56 ha)
- Adderbury (3.36 ha) Brymbo Ironworks, Hook Norton (0.73 ha)
- PA Turneys, Weston on the Green (1.9 ha)

Committed Sites

31. Other committed sites (those with planning permission and a likelihood that the development will be delivered within 3 years) were identified through those planning applications determined through the Cherwell District Council Planning Committee. The following developments were identified. None of the Sites had the capacity to accommodate the proposals.

Table 3: Assessment of Committed Sites

Planning Ref	Location	Description	Notes	Suitable
18/01333/F	Bicester	Extension to existing	The site	Not suitable – will
	Heritage	Technical Site to	extends to	not accommodate
	Buckingham	provide new	1.6ha. The	the scale of
	Road	employment units	remainder of	development
	Bicester	comprising flexible	the Site is	required.
	(Forms part	B1(c) light industrial, B2	allocated for	
	of Planning	(general industrial), B8	heritage	
	Policy BIC8	(storage or	tourist	
	Former RAF	distribution) uses with	development.	
	Bicester)	ancillary offices,		
		storage, display and		
		sales, together with		
		associated access,		
		parking and		
		landscaping.		
18/02160/F	Part Of OS	Redevelopment of part	The Site area	Not suitable – will
	Parcel 0083	of the site with new	is 0.72ha.	not accommodate
	North Of 89	purpose-built buildings		the scale of
	Cassington	for B1 and B8 use		development
	Road	including provision for		required/ Use
	Yarnton	access onto Cassington		Class not
		Road		compatible.
19/02708/OUT	Bicester	Outline: - Provide new	The site area	Not suitable – will
	Heritage	employment units	is 10.08ha.	not accommodate
	Buckingham	comprising B1		the scale of
	Road	(Business), B2 (General		development
	Bicester	Industrial), B8 (Storage)		required. Large B8
		and D1 (Education)		units would not
		uses with ancillary		be suitable
		offices, storage, display		adjacent to Listed
		and sales, with all		Buildings and the
		matters reserved		Conservation Area
		except for access		

20/00247/F	Land South East of Town and Country Scaffolding Ltd Tramway Road Banbury	Erection of three B1 (c) light industrial units	The site area is 0.54ha.	Not suitable – will not accommodate the scale of development required.
19/02081/F	Land Adj to Unit E25 Telford Road Bicester	Erection of four Class B2 units of varying sizes with associated car parking and landscaping - Resubmission of 19/00545/F	The site area is 0.8ha.	Not suitable – will not accommodate the scale of development required
20/02139/F	E P Barrus Ltd Launton Road Bicester OX26 4U	Demolition of existing VOSA buildings and the erection of two new commercial building	The site area is 0.6ha.	Not suitable – will not accommodate the scale of development required

32. A site assessment has been undertaken to identify potential existing sites of 10ha within the settlements of Bicester, Banbury and Kidlington. No employment sites are available of the scale required in the urban areas of these settlements.

8

Village: Adderbury

Image 1: Aerial View of the Village (Potential Sites edged in red)



Village Constraints and Opportunities (See Appendix 1 for planning policy constraints)

- The A4260 runs through the centre of the village connecting the village to Banbury to the northeast and Oxford to the south-west.
- Growth within the village to the north is constrained by the Twyford Gap Policy within the Adderbury Neighbourhood Plan that seeks to prevent coalesence between Adderbury and Banbury.
- The area to the west of the village is located within a Conservation Target Area (CTA) that has been idenified as being an area to restore biodiversity at a landscape scale.
- The Adderbury Conservation Area extends to cover most of the northen part of the village and the land between the southern boundary and the A4260.
- Much of the area to the east of the village is in flood risk zone 3 and is not therefore considered suitable for development.
- Growth to the west of the village along Berry Hill Road/Milton Road is within the Adderbury Milton
 Gap, as identified in the Adderbury Neigbourhod Plan. Development within this area is resisted in
 order to prevent visual coalesence.

Sites Identified for Further Assessment

• Site 1 located on the western edge of the village fronting the A4260.

Table 2: Site Search Parameters

Constraints and Requirements

Stage 1						
	Yes	No				
Access. Is the settlement within close proximity to the motorway junction (within approximately 5 miles measured by road (preferably A road))?	Y					
Conclusion: Progressed to Stag	e 2					
Stage 2						
	Site 1	Site 2	Site 3	Site 4	Site 5	Site 6
Are there potential suitable sites within the settlement?	N					
Are there potential suitable sites on the edge of the settlement?	Y					
Conclusion: Site 1 progressed t	o Stage 3	•			•	
Stage 3						
Is the site a minimum of 10 Hectares?	Y (approx. 20 ha)					
Conclusion: Site 1 not progress	•	4			•	
Stage 4						
Is the site affected by any of the below planning constraints?						
Area of Outstanding Natural Beauty	N					
Flood Risk Zone 2 /3	N					
Conclusion: Site 1 not progress	ed to Stage	5				
Stage 5						
Site dimensions: suitability of site shape to operationally accommodate proposed development of c 27,500 sqm.	Y					
Suitability of proposed development to the	N					

surrounding pattern of development in the context of the physical form of				
development. Suitability of the proposed development to the surrounding pattern of development to operationally accommodate the proposed development, e.g. HGV traffic movement.	N			
Conclusion : The site is open and impact on the character of the v		•		•
Stage 6				
If suitable, availability of the land.				
Conclusion:				

Category Villages by Category A Service Villages Minor Development:

Adderbury, Ambrosden, Arncott, Begbroke, Bletchingdon (*), Bloxham, Bodicote, Chesterton, Cropredy, Deddington, Finmere, Fringford, Fritwell, Hook Norton, Kidlington, Kirtlington, Launton, Milcombe, Sibford Ferris/Sibford Gower, Steeple Aston, Weston-on—the-Green (*), Wroxton, Yarnton

(*) Denotes villages partly within and partly outside the Green Belt.

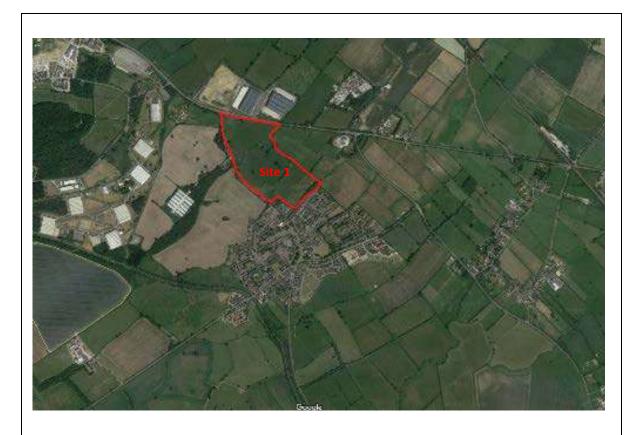
Village: Adderbury Policies Map





Village: Ambrosden

Image 1: Aerial View of the Village (Potential Sites edged in red)



Village Constraints and Opportunities (See Appendix 1 for planning policy constraints)

- Ambrosden is a small villages to the south east of Bicester.
- Village does not benefit from direct access onto the A41.
- The existing open fields that surround Ambrosden to the north and west form an important open gap between the village and Bicester.
- The majority of land that separates Ambrosden and Arncott (to the south) is designated Special Areas of Conservation, Local Wild Sites, NERC Act 41 Habitats or SSSI and is not therefore suitable for development.

Sites Identified for Further Assessment

• Site 1 identified on the northern boundary.

Table 2: Site Search Parameters

Constraints and Requirements

Stage 1						
	Yes	No				
Access. Is the settlement within close proximity to the motorway junction (within approximately 5 miles measured by road (preferably A road))?	Y					
Conclusion: Progressed to Stage	e 2					
Stage 2						
	Site 1	Site 2	Site 3	Site 4	Site 5	Site 6
Are there potential suitable sites within the settlement?	N					
Are there potential suitable sites on the edge of the settlement?	Υ					
Conclusion: Site 1 progressed to	o Stage 3					
Stage 3						
Is the site a minimum of 10 Hectares?	Y (approx. 22 ha)					
Conclusion: Site 1 not progress	ed to Stage	4				
Stage 4						
Is the site affected by any of the below planning constraints?						
Area of Outstanding Natural Beauty	N					
Flood Risk Zone 2 /3	N					
Conclusion: The site would fill to proposed development would a not considered suitable and doc Stage 5	dversely in	pact on the	rural charac	cter of the vi		
Juge J						
Site dimensions: suitability of site shape to operationally accommodate proposed development of c 27,500 sqm.						

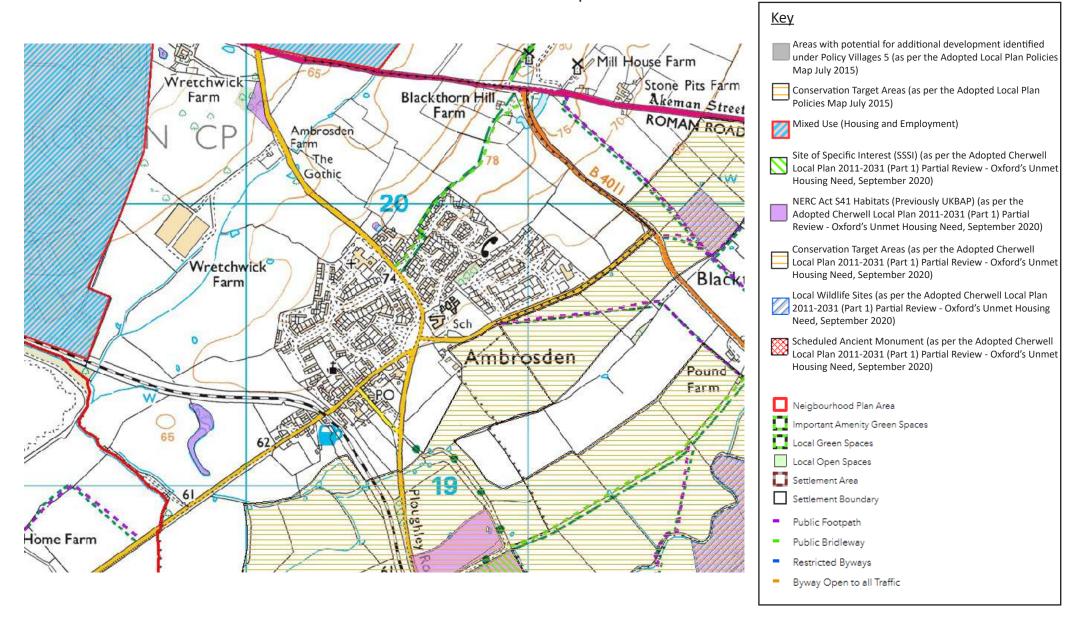
Suitability of proposed			
development to the			
surrounding pattern of			
development in the context			
of the physical form of			
development.			
Suitability of the proposed	_	 _	
development to the			
surrounding pattern of			
development to operationally			
accommodate the proposed			
development, e.g. HGV traffic			
movement.			
Conclusion:			
Stage 6			
If suitable, availability of the			
land.			
Conclusion:			

Category Villages by Category A Service Villages Minor Development:

Adderbury, **Ambrosden**, Arncott, Begbroke, Bletchingdon (*), Bloxham, Bodicote, Chesterton, Cropredy, Deddington, Finmere, Fringford, Fritwell, Hook Norton, Kidlington, Kirtlington, Launton, Milcombe, Sibford Ferris/Sibford Gower, Steeple Aston, Weston-on—the-Green (*), Wroxton, Yarnton

(*) Denotes villages partly within and partly outside the Green Belt.

Village: Ambrosden Policies Map



Village: Arncott

Image 1: Aerial View of the Village (Potential Sites edged in red)



Village Constraints and Opportunities (See Appendix 1 for planning policy constraints)

- Arncott is a small villages to the south east of Bicester.
- Village does not benefit from direct access onto the A41.
- The majority of land that separates Ambrosden (to the north) and Arncott is designated Special Areas of Conservation, Local Wild Sites, NERC Act 41 Habitats or SSSI and is not therefore suitable for development.
- Land to the west of Arncott is controlled by the MOD and not therefore considered suitable.
- Land to the east of Arncott is too small for the proposals.

Sites Identified for Further Assessment

None

Table 2: Site Search Parameters

Constraints and Requirements

Stage 1								
	Yes	No						
Access. Is the settlement within close proximity to the motorway junction (within approximately 5 miles measured by road (preferably A road))?	N		8.1 miles					
Conclusion: Not progressed to	Stage 2							
Stage 2								
	Site 1	Site 2	Site 3	Site 4	Site 5	Site 6		
Are there potential suitable sites within the settlement?								
Are there potential suitable sites on the edge of the settlement?								
Conclusion:	•	-	-	- 1	•			
Stage 3								
Is the site a minimum of 10 Hectares?								
Conclusion:		•						
Stage 4								
Is the site affected by any of the below planning constraints?								
Area of Outstanding Natural Beauty								
Flood Risk Zone 2 /3								
Conclusion:								
Stage 5								
Site dimensions: suitability of site shape to operationally accommodate proposed development of c 27,500 sqm.								
Suitability of proposed development to the surrounding pattern of								

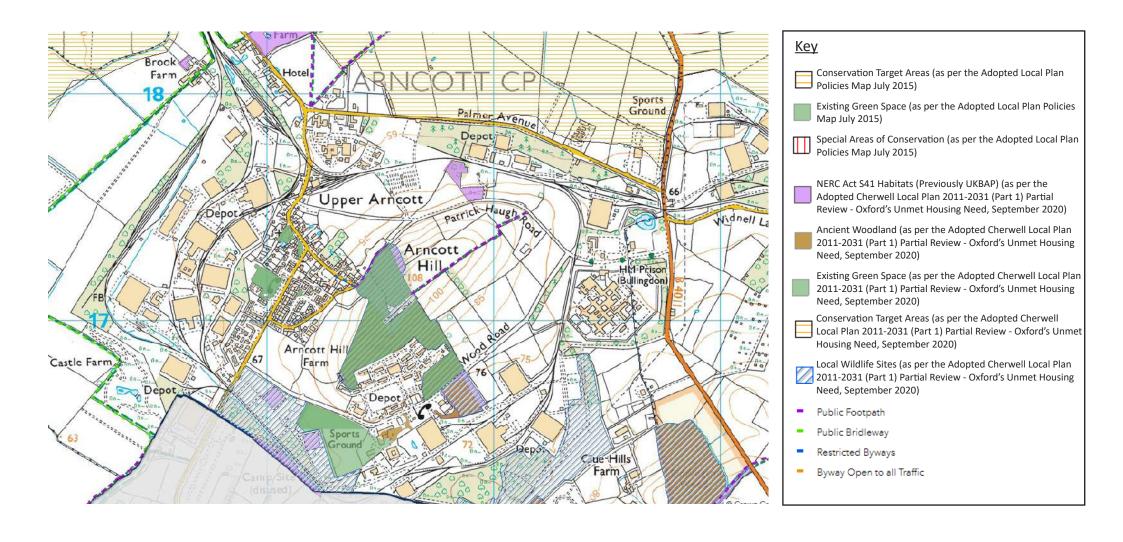
development in the context						
of the physical form of						
development.						
Suitability of the proposed						
development to the						
surrounding pattern of						
development to operationally						
accommodate the proposed						
development, e.g. HGV traffic						
movement.						
Conclusion:						
Stage 6						
If suitable, availability of the						
land.						
Conclusion:						
Conclusion:						

Category Villages by Category A Service Villages Minor Development:

Adderbury, Ambrosden, **Arncott**, Begbroke, Bletchingdon (*), Bloxham, Bodicote, Chesterton, Cropredy, Deddington, Finmere, Fringford, Fritwell, Hook Norton, Kidlington, Kirtlington, Launton, Milcombe, Sibford Ferris/Sibford Gower, Steeple Aston, Weston-on—the-Green (*), Wroxton, Yarnton

(*) Denotes villages partly within and partly outside the Green Belt.

Village: Arncott Policies Map



Village: Begbroke

Image 1: Aerial View of the Village (Potential Sites edged in red)



Village Constraints and Opportunities (See Appendix 1 for planning policy constraints)

- Begbroke and the surrounding area lies within the Oxfordshire Green Belt.
- The proposed development subject of this Site Search on the edge of Begbroke would constitute
 inappropriate development in the Green Belt (paragraph NPPF 147). Inappropriate development in
 the Green Belt should not be approved except in very 'special circumstances' (paragraph NPPF
 147).
- Policy SLE1 states that employment development in the rural area 'will be outside the Green Belt unless very special circumstances can be demonstrated'.
- The Green Belt test for 'very special circumstances' for a stand alone development, such as the
 proposed development, would involve the assessment of the availability of land out within the
 Green Belt
- The proposed Symmetry Park Ardley site is considered an alternative option in delivering the development outside of the Green Belt. As such, 'very special circumstances' for land on the edge of Begbroke could not be demonstrated to allow Green Belt land to be released.

Sites Identified for Further Assessment

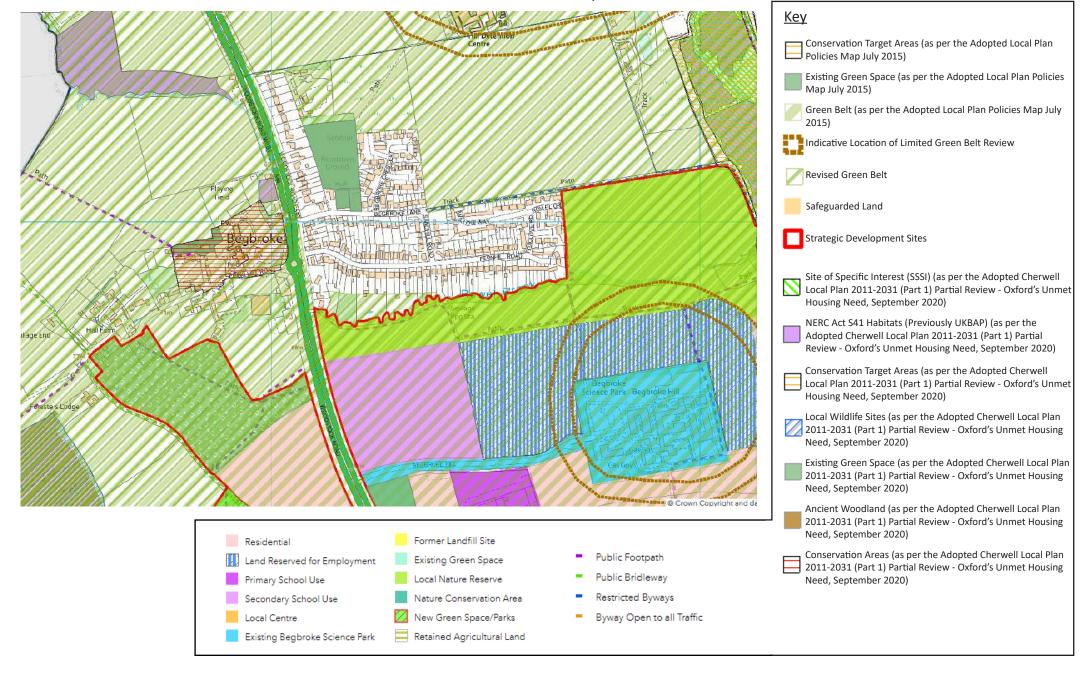
• No sites identified due to the Green Belt.

Stage 1									
	Yes	No							
Access. Is the settlement within close proximity to the motorway junction (within approximately 5 miles measured by road (preferably A road))?	N								
Conclusion: Not progressed to	Stage 2								
Stage 2			1						
	Site 1	Site 2	Site 3	Site 4	Site 5	Site 6			
Are there potential suitable sites within the settlement?									
Are there potential suitable sites on the edge of the settlement?									
Conclusion:									
Stage 3									
Is the site a minimum of 10 Hectares?									
Conclusion:									
Stage 4									
Is the site affected by any of the below planning constraints?									
Area of Outstanding Natural Beauty									
Flood Risk Zone 2 /3									
Conclusion:									
Stage 5									
Site dimensions: suitability of site shape to operationally accommodate proposed development of c 27,500 sqm.									
Suitability of proposed development to the surrounding pattern of									

development in the context			
of the physical form of			
development.			
Suitability of the proposed			
development to the			
surrounding pattern of			
development to operationally			
accommodate the proposed			
development, e.g. HGV traffic			
movement.			
Conclusion:			
Stage 6			
If suitable, availability of the			
land.			
Conclusion:			
Conclusion:			

Adderbury, Ambrosden, Arncott, **Begbroke**, Bletchingdon (*), Bloxham, Bodicote, Chesterton, Cropredy, Deddington, Finmere, Fringford, Fritwell, Hook Norton, Kidlington, Kirtlington, Launton, Milcombe, Sibford Ferris/Sibford Gower, Steeple Aston, Weston-on—the-Green (*), Wroxton, Yarnton

Village: Begbroke Policies Map



Village: Bletchingdon

Image 1: Aerial View of the Village (Potential Sites edged in red)



Village Constraints and Opportunities (See Appendix 1 for planning policy constraints)

- Bletchingdon lies to the south west of Bicester.
- The village of Bletchington does not have direct access to an A road.
- Land to the south and east of the village is within the Oxfordshire Green Belt where development is restricted except in very special circumstances.
- The proposed Symmetry Park Ardley site is considered an alternative option in delivering the development, outside of the Green Belt. As such, 'very special circumstances' for land on the east and southern boundaries of Bletchingdon could not be demonstrated to allow Green Belt land to be released.
- Land to the north is identifed as a Conservation Target Area. The CTA's are the most important areas for wildlife where targeted conservation action will have maximum benefit.
- Development on land to the west of the village would be adjacent to the Conservation Area. A
 development of the scale of the proposals would adversly impact this Heritage Asset and is
 therefore be considered inapproriate.

Sites Identified for Further Assessment

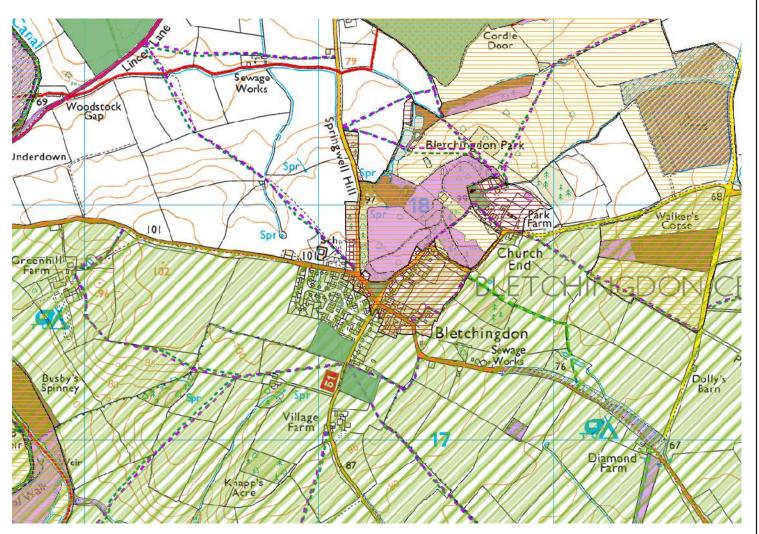
• No sites identified.

Stage 1								
	Yes	No						
Access. Is the settlement within close proximity to the motorway junction (within approximately 5 miles measured by road (preferably A road))?	Y		5.5-6.6 miles to motorway					
Conclusion: Progressed to Stag	e 2							
Stage 2								
	Site 1	Site 2	Site 3	Site 4	Site 5	Site 6		
Are there potential suitable sites within the settlement?	N							
Are there potential suitable sites on the edge of the settlement?	N							
Conclusion: Not progressed to	Stage 3	'	'	1				
Stage 3								
Is the site a minimum of 10 Hectares?								
Conclusion:		•			•			
Stage 4								
Is the site affected by any of the below planning constraints?								
Area of Outstanding Natural Beauty								
Flood Risk Zone 2 /3								
Conclusion:	1							
Stage 5								
Site dimensions: suitability of site shape to operationally accommodate proposed development of c 27,500 sqm.								
Suitability of proposed development to the surrounding pattern of								

development in the context							
of the physical form of							
development.							
Suitability of the proposed							
development to the							
surrounding pattern of							
development to operationally							
accommodate the proposed							
development, e.g. HGV traffic							
movement.							
Conclusion:							
Stage 6							
If suitable, availability of the							
land.							
Conclusion:							

Adderbury, Ambrosden, Arncott, Begbroke, **Bletchingdon** (*), Bloxham, Bodicote, Chesterton, Cropredy, Deddington, Finmere, Fringford, Fritwell, Hook Norton, Kidlington, Kirtlington, Launton, Milcombe, Sibford Ferris/Sibford Gower, Steeple Aston, Weston-on—the-Green (*), Wroxton, Yarnton

Village: Bletchingdon Policies Map



Key Conservation Target Areas (as per the Adopted Local Plan Policies Map July 2015) Existing Green Space (as per the Adopted Local Plan Policies Map July 2015) Green Belt (as per the Adopted Local Plan Policies Map July 2015) Revised Green Belt Strategic Development Sites Historic Parks and Gardens (as per the Adopted Cherwell Local Plan 2011-2031 (Part 1) Partial Review - Oxford's Unmet Housing Need, September 2020) NERC Act S41 Habitats (Previously UKBAP) (as per the Adopted Cherwell Local Plan 2011-2031 (Part 1) Partial Review - Oxford's Unmet Housing Need, September 2020) Conservation Target Areas (as per the Adopted Cherwell Local Plan 2011-2031 (Part 1) Partial Review - Oxford's Unmet Housing Need, September 2020) Local Wildlife Sites (as per the Adopted Cherwell Local Plan 2011-2031 (Part 1) Partial Review - Oxford's Unmet Housing Need, September 2020) Existing Green Space (as per the Adopted Cherwell Local Plan 2011-2031 (Part 1) Partial Review - Oxford's Unmet Housing Need, September 2020) Ancient Woodland (as per the Adopted Cherwell Local Plan 2011-2031 (Part 1) Partial Review - Oxford's Unmet Housing Need, September 2020) Conservation Areas (as per the Adopted Cherwell Local Plan 2011-2031 (Part 1) Partial Review - Oxford's Unmet Housing Need, September 2020) Public Footpath Public Bridleway Restricted Byways Byway Open to all Traffic

Village: Bloxham

Image 1: Aerial View of the Village (Potential Sites edged in red)



Village Constraints and Opportunities (See Appendix 1 for planning policy constraints)

- Bloxham lies to the south west of Banbury.
- The A361 runs through the village and connects the village to Banbury to the north east and Chipping Norton to the south west.
- Bloxham Conservation Area covers the central part of the villages and straddles the A361.
- Development to the eastern boundary is precluded due to the Conservation Area Target Area.

Sites Identified for Further Assessment

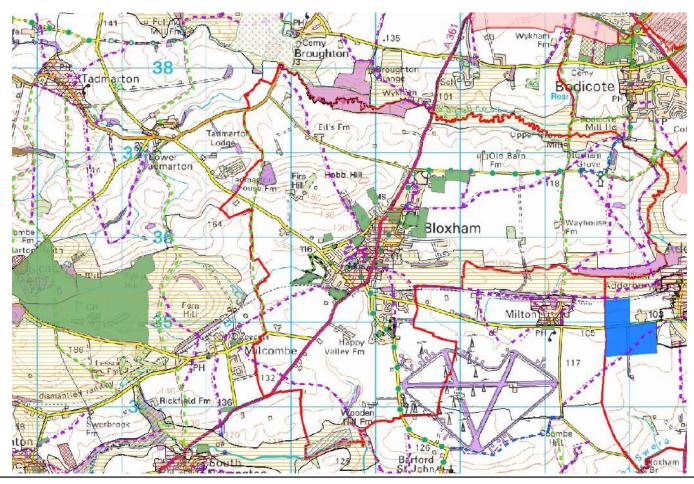
• Sites 1 and 2 were initially identified as being potentially suitable. Further investigation showed that the development of site 1 would require the removal of a large number of mature trees. Part of Site 2 that adjoins the settlement boundary is a recreational ground which is protected from development under policy BSC10 of the Cherwell Local Plan, furthermore part of Site 2 floods regularly. Sites 1 and 2 were not therefore considered suitable.

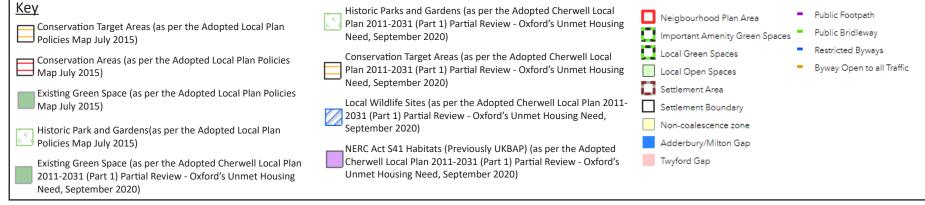
Stage 1									
	Yes	No							
Access. Is the settlement within close proximity to the motorway junction (within approximately 5 miles measured by road (preferably A road))?	Y		Approx. 5 miles to motorway junction						
Conclusion: Progressed to Stag	e 2								
Stage 2									
	Site 1	Site 2	Site 3	Site 4	Site 5	Site 6			
Are there potential suitable sites within the settlement?	N	N							
Are there potential suitable sites on the edge of the settlement?	Y	Y							
Conclusion: Sites 1 and 2 progr	essed to Sta	age 3							
Stage 3									
Is the site a minimum of 10 Hectares?	Y (23.217 ha)	Y (19.10 ha)							
Conclusion: Sites 1 and 2 progr	essed to Sta	age 4							
Stage 4									
Is the site affected by any of the below planning constraints?									
Area of Outstanding Natural Beauty	N	N							
Flood Risk Zone 2 /3	N	Υ							
Conclusion: Site 1 Progressed t	o Stage 5, S	ite 2 not pr	ogressed to S	Stage 5	1	<u>I</u>			
Stage 5									
Site dimensions: suitability of site shape to operationally accommodate proposed development of c 27,500 sqm.	Y								

Suitability of proposed	N						
Suitability of proposed							
development to the							
surrounding pattern of							
development in the context							
of the physical form of							
development.							
Suitability of the proposed	N						
development to the							
surrounding pattern of							
development to operationally							
accommodate the proposed							
development, e.g., HGV traffic							
movement.							
Conclusion: Site 1 is located sou	ith of the vi	llage either	side of the A	A362. The A3	61 through t	he village is not	
suitable for HGV traffic, in parti	cular there i	s congestio	n in the cent	tre of the vill	age in which	the roads are	
narrow and two HGVs would no	t be able to	pass each	other. Deve	lopment on	the site woul	ld require the	
removal of a large number of tr	ees and wo	uld have an	overbearing	g impact on t	he village in	this location.	
Stage 6				•	Ţ.		
ŭ							
If suitable, availability of the							
land.							
Conclusion:							

Adderbury, Ambrosden, Arncott, Begbroke, Bletchingdon (*), **Bloxham**, Bodicote, Chesterton, Cropredy, Deddington, Finmere, Fringford, Fritwell, Hook Norton, Kidlington, Kirtlington, Launton, Milcombe, Sibford Ferris/Sibford Gower, Steeple Aston, Weston-on—the-Green (*), Wroxton, Yarnton

Village: Bloxham Policies Map





Village: Bodicote

Image 1: Aerial View of the Village (Potential Sites edged in red)



Village Constraints and Opportunities (See appendix 1 for planning policy constraints)

- Bodicote is a small village on the outskirts of Banbury.
- The village has access to the A4260 that connects the village to Banbury to the north east and Oxford to the south west.
- Bodicote's northern boundary is contiguous with Banbury.
- The Conservation Area extend to the village's western boundary and would preclude development in this location.
- The land on the villages southern boundary forms the 'Twyford Gap'separation between the built up urban settlement of Bodicote (Banbury) and Adderbury.

Sites Identified for Further Assessment

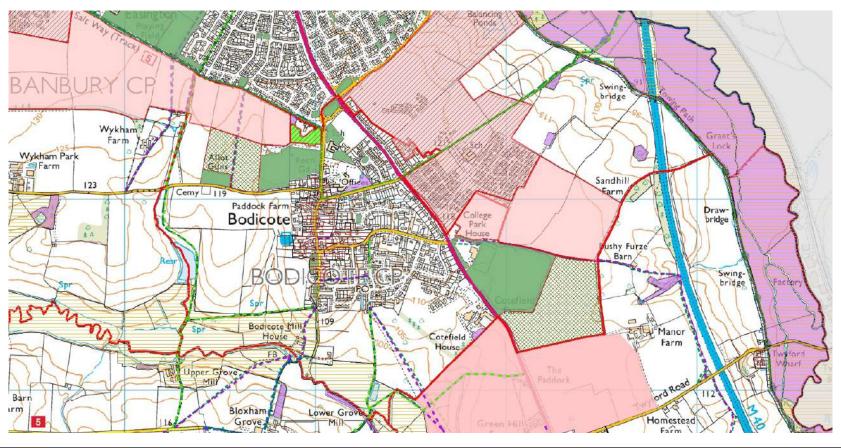
No sites identified.

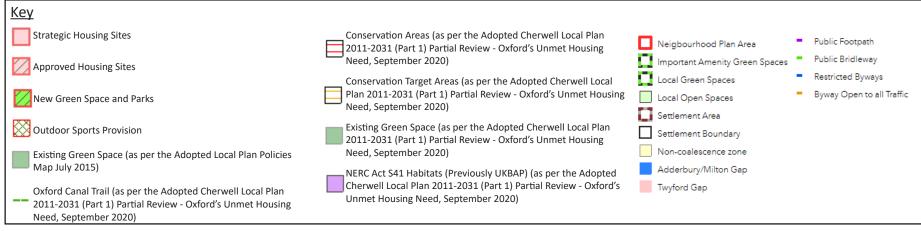
Stage 1									
	Yes	No							
Access. Is the settlement within close proximity to the motorway junction (within 2km measured by road)?	Y		3 Miles						
Conclusion: Progressed to Stage 2									
Stage 2									
	Site 1	Site 2	Site 3	Site 4	Site 5	Site 6			
Are there potential suitable sites within the settlement?	N								
Are there potential suitable sites on the edge of the settlement?	N								
Conclusion: Not progressed to S									
Stage 3									
Is the site a minimum of 10 Hectares?									
Conclusion:									
Stage 4									
Is the site affected by any of the below planning constraints?									
Area of Outstanding Natural Beauty									
Flood Risk Zone 2 /3									
Conclusion:			<u>I</u>	1	I.	L			
Stage 5									
Site dimensions: suitability of site shape to operationally accommodate proposed development of c 27,500 sqm.									
Suitability of proposed development to the surrounding pattern of development in the context									

of the physical form of								
development.								
Suitability of the proposed								
development to the								
surrounding pattern of								
development to operationally								
accommodate the proposed								
development, e.g. HGV traffic								
movement.								
Conclusion:								
Stage 6								
If suitable, availability of the								
land.								
Conclusion:								

Adderbury, Ambrosden, Arncott, Begbroke, Bletchingdon (*), Bloxham, **Bodicote,** Chesterton, Cropredy, Deddington, Finmere, Fringford, Fritwell, Hook Norton, Kidlington, Kirtlington, Launton, Milcombe, Sibford Ferris/Sibford Gower, Steeple Aston, Weston-on-the-Green (*), Wroxton, Yarnton

Village: Bodicote Policies Map





Village: Chesterton

Image 1: Aerial View of the Village (Potential Sites edged in red)



Village Constraints and Opportunities (See Appendix 1 for planning policy constraints).

- The village has access to the A4095. The village lies to the west of Bicester, with several fields separating the urban edge of Bicester and the village's eastern boundary.
- The eastern edge of the village forms the edge of the Conservation Area which would preclude the scale of development required on this boundary. Development on the eastern boundary would reduce the gap between the village and the urban edge of Bicester.
- The Conservation Area of the village extends to its northern edge which would preclude the scale of development required on this boundary.
- Land to the west has permission for an indoor leisure facility and is therefore not considered suitable.

Sites Identified for Further Assessment

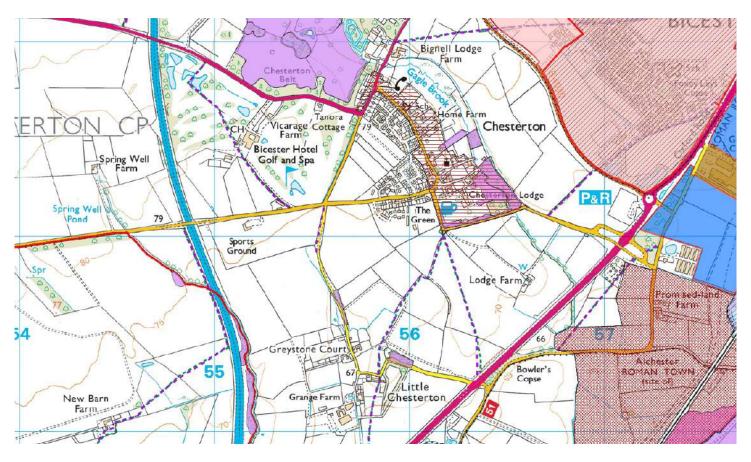
• No sites identified.

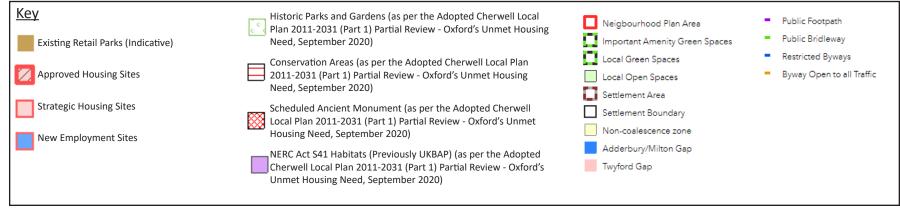
Stage 1						
	Yes	No				
Access. Is the settlement within close proximity to the motorway junction (within approximately 5 miles measured by road (preferably A road))?	Y					
Conclusion: Progressed to Stag	e 2					
Stage 2						
	Site 1	Site 2	Site 3	Site 4	Site 5	Site 6
Are there potential suitable sites within the settlement?	N					
Are there potential suitable sites on the edge of the settlement?	N					
Conclusion: Not progressed to	Stage 3		•		•	
Stage 3						
Is the site a minimum of 10 Hectares?						
Conclusion:		•				
Stage 4						
Is the site affected by any of the below planning constraints?						
Area of Outstanding Natural Beauty						
Flood Risk Zone 2 /3						
Conclusion:						
Stage 5						
Site dimensions: suitability of site shape to operationally accommodate proposed development of c 27,500 sqm.						
Suitability of proposed development to the surrounding pattern of						

development in the context							
of the physical form of							
development.							
Suitability of the proposed							
development to the							
surrounding pattern of							
development to operationally							
accommodate the proposed							
development, e.g. HGV traffic							
movement.							
Conclusion:							
Stage 6							
If suitable, availability of the							
land.							
Conclusion:							

Adderbury, Ambrosden, Arncott, Begbroke, Bletchingdon (*), Bloxham, Bodicote, **Chesterton**, Cropredy, Deddington, Finmere, Fringford, Fritwell, Hook Norton, Kidlington, Kirtlington, Launton, Milcombe, Sibford Ferris/Sibford Gower, Steeple Aston, Weston-on—the-Green (*), Wroxton, Yarnton

Village: Chesterton Policies Map





Village: Cropredy

Image 1: Aerial View of the Village (Potential Sites edged in red)



Village Constraints and Opportunities (See Appendix 1 for planning policy constraints)

- Cropredy lies 27 miles north of Bicester.
- The village does not have access on to an A Road.
- The Conservation Area extends to all boundaries of the village, except for a small area of linear development along the south-west boundary.
- Land to the east is registered as a Battlefield and is therefore a heritage asset.
- Land to the north of the village is below the required 50ha and is constrained by flood zone 3.

Sites Identified for Further Assessment

No sites identified.

Stage 1									
	Yes	No							
Access. Is the settlement within close proximity to the motorway junction (within approximately 5 miles measured by road (preferably A road))?	Y								
Conclusion: Progressed to Stage	e 2								
Stage 2		Ļ							
	Site 1	Site 2	Site 3	Site 4	Site 5	Site 6			
Are there potential suitable sites within the settlement?	N								
Are there potential suitable sites on the edge of the settlement?	N								
Conclusion: Not progressed to	Stage 3								
Stage 3									
Is the site a minimum of 10 Hectares?									
Conclusion:				•		•			
Stage 4									
Is the site affected by any of the below planning constraints?									
Area of Outstanding Natural Beauty									
Flood Risk Zone 2 /3									
Conclusion:	<u> </u>								
Stage 5									
Site dimensions: suitability of site shape to operationally accommodate proposed development of c 27,500 sqm.									
Suitability of proposed development to the									

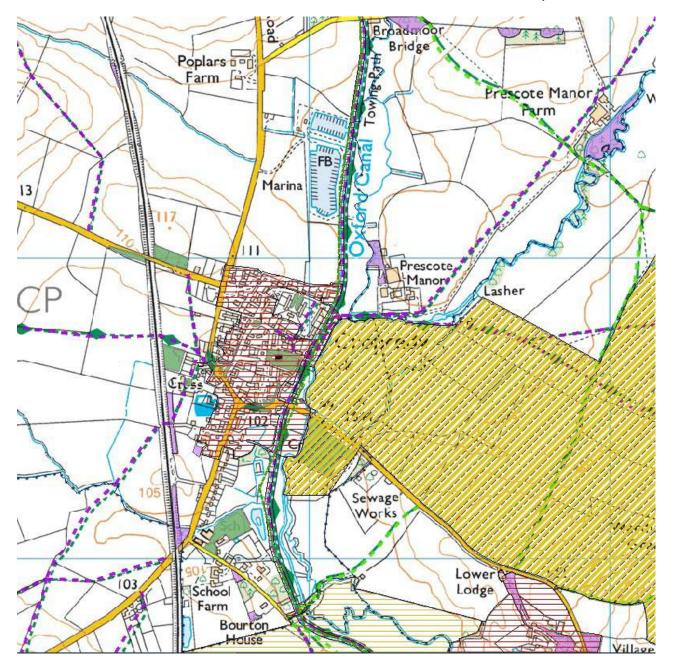
surrounding pattern of							
development in the context							
of the physical form of							
development.							
Suitability of the proposed							
development to the							
surrounding pattern of							
development to operationally							
accommodate the proposed							
development, e.g. HGV traffic							
movement.							
Conclusion:							
Stage 6							
If suitable, availability of the							
land.							
Conclusion:							

Adderbury, Ambrosden, Arncott, Begbroke, Bletchingdon (*), Bloxham, Bodicote, Chesterton, **Cropredy**, Deddington, Finmere, Fringford, Fritwell, Hook Norton, Kidlington, Kirtlington, Launton, Milcombe, Sibford Ferris/Sibford Gower, Steeple Aston, Weston-on—the-Green (*), Wroxton, Yarnton

(*) Denotes villages partly within and partly outside the Green Belt.

Appendix

Village: Cropredy Policies Map



Key Conservation Areas (as per the Adopted Local Plan Policies Map July 2015) Existing Green Space (as per the Adopted Local Plan Policies Map July 2015) Battlefields (as per the Adopted Local Plan Policies Map July 2015) NERC Act S41 Habitats (Previously UKBAP) (as per the Adopted Cherwell Local Plan 2011-2031 (Part 1) Partial Review - Oxford's Unmet Housing Need, September 2020) Conservation Target Areas (as per the Adopted Cherwell Local Plan 2011-2031 (Part 1) Partial Review - Oxford's Unmet Housing Need, September 2020) Existing Green Space (as per the Adopted Cherwell Local Plan 2011-2031 (Part 1) Partial Review - Oxford's Unmet Housing Need, September 2020) Conservation Areas (as per the Adopted Cherwell Local Plan 2011-2031 (Part 1) Partial Review - Oxford's Unmet Housing Need, September 2020) Public Footpath Public Bridleway Restricted Byways Byway Open to all Traffic

Village: Deddington

Image 1: Aerial View of the Village (Potential Sites edged in red)



Village Constraints and Opportunities (See Appendix 1 for planning policy constraints).

- Deddington lies 21 miles north west of Bicester.
- The A4260 runs through the village in a north-south orientation and connects the village to Banbury to the north and Oxford to the south.
- The Conservation Area extends to include almost the whole of the village, with the exception of development located to the north east of the A4260, which would preclude development on land south of the B4031 and the east of the A4260.

Sites Identified for Further Assessment

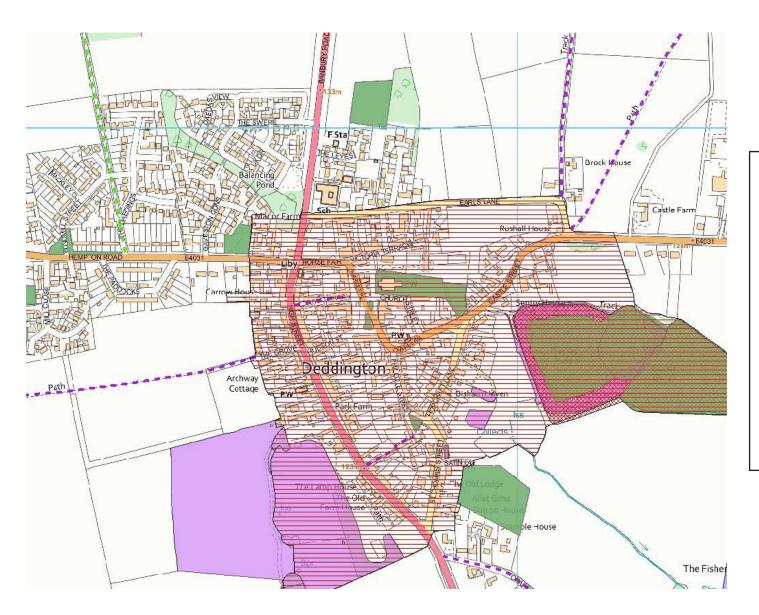
Site 1 was identified to the north of Deddington.

Stage 1								
Stage 1								
	Yes	No						
Access. Is the settlement within close proximity to the motorway junction (within approximately 5 miles measured by road (preferably A road))?	Υ							
Conclusion: Progressed to Stage	e 2							
Stage 2								
	Site 1	Site 2	Site 3	Site 4	Site 5	Site 6		
Are there potential suitable sites within the settlement?	N							
Are there potential suitable sites on the edge of the settlement?	Υ							
Conclusion: Site 1 progressed to	Stage 3							
Stage 3								
Is the site a minimum of 10 Hectares?	Y (24.80 ha)							
Conclusion: Site 1 not progress	ed to Stage	4						
Stage 4								
Is the site affected by any of the below planning constraints?								
Area of Outstanding Natural Beauty	N							
Flood Risk Zone 2 /3								
Conclusion:	I	ı	1		1	1		
Stage 5								
Site dimensions: suitability of site shape to operationally accommodate proposed development of c 27,500 sqm.	Y							
Suitability of proposed development to the surrounding pattern of								

development in the context						
of the physical form of						
development.						
Suitability of the proposed	N					
development to the						
surrounding pattern of						
development to operationally						
accommodate the proposed						
development, e.g. HGV traffic						
movement.						
Conclusion: The Banbury Road (A4260) through the villages of Deddington, Adderbury and then into						
Banbury would be suitable for H	HGV traffic.					
Stage 6						
	T					
If suitable, availability of the						
land.						
Conclusion:						

Adderbury, Ambrosden, Arncott, Begbroke, Bletchingdon (*), Bloxham, Bodicote, Chesterton, Cropredy, **Deddington**, Finmere, Fringford, Fritwell, Hook Norton, Kidlington, Kirtlington, Launton, Milcombe, Sibford Ferris/Sibford Gower, Steeple Aston, Weston-on–the-Green (*), Wroxton, Yarnton

Village: Deddington Policies Map



<u>Key</u>

- Conservation Areas (as per the Adopted Local Plan Policies Map July 2015)
- Existing Green Space (as per the Adopted Local Plan Policies Map July 2015)
- Scheduled Ancient Monument (as per the Adopted Local Plan Policies Map July 2015)
- NERC Act S41 Habitats (Previously UKBAP) (as per the Adopted Cherwell Local Plan 2011-2031 (Part 1) Partial Review Oxford's Unmet Housing Need, September 2020)
- Existing Green Space (as per the Adopted Cherwell Local Plan 2011-2031 (Part 1) Partial Review - Oxford's Unmet Housing Need, September 2020)
- Public Footpath
- Public Bridleway
- Restricted Byways
- Byway Open to all Traffic

Village: Fringford

Image 1: Aerial View of the Village (Potential Sites edged in red)



Village Constraints and Opportunities (See Appendix 1 for planning policy constraints).

- Fringford village lies approximately 5 miles north east of Bicester and does not have access to an A
 road.
- A water course is in close proximity to the north, east and part of the southern boundary.
- Lies within an area of Nitrates Neutrality designation.
- The village does not have a Conservation Area.
- Development restricted at the southern and south east boundary due to Listed Buildings located on/close to the village boundary.
- Development restricted at the eastern boundary due to the Poplar Spinney and Hopland Spinney which is part designated Ancient Woodland and NERC Act S41 Habitat.
- Lies within the impact area of the Tingewick Meadow SSSI to the east.

Sites Identified for Further Assessment

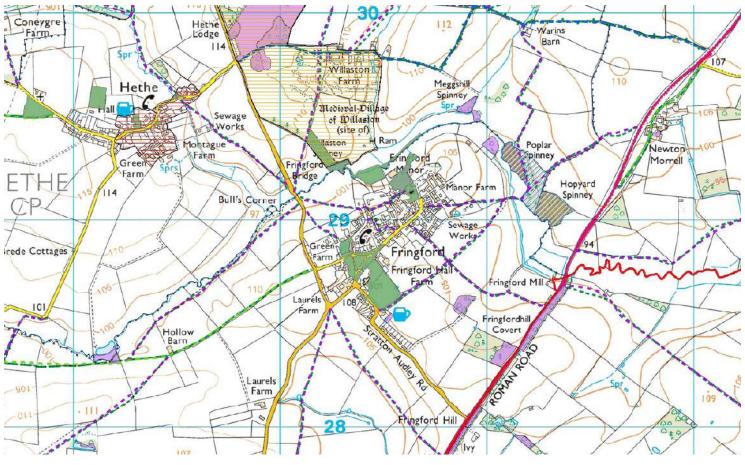
No sites identified.

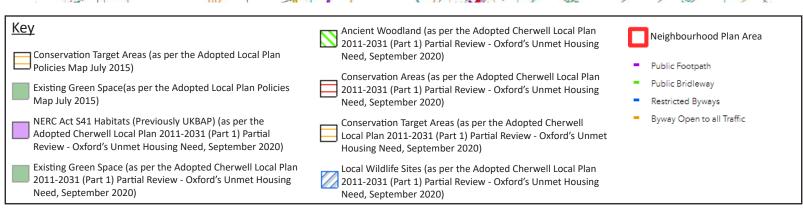
Stage 1							
	Yes	No					
Access. Is the settlement within close proximity to the motorway junction (within approximately 5 miles measured by road (preferably A road))?	Y		6 miles to motorway				
Conclusion: Progressed to Stag	e 2						
Stage 2							
	Site 1	Site 2	Site 3	Site 4	Site 5	Site 6	
Are there potential suitable sites within the settlement?	N						
Are there potential suitable sites on the edge of the settlement?	N						
Conclusion: Not progressed to	Stage 3	-	-	•			
Stage 3							
Is the site a minimum of 10 Hectares ?							
Conclusion:		•			•		
Stage 4							
Is the site affected by any of the below planning constraints?							
Area of Outstanding Natural Beauty							
Flood Risk Zone 2 /3							
Conclusion:					I	I	
Stage 5							
Site dimensions: suitability of site shape to operationally accommodate proposed development of c 27,500 sqm.							
Suitability of proposed development to the surrounding pattern of							

development in the context			
of the physical form of			
development.			
Suitability of the proposed			
development to the			
surrounding pattern of			
development to operationally			
accommodate the proposed			
development, e.g. HGV traffic			
movement.			
Conclusion:			
Stage 6			
If suitable, availability of the			
land.			
Conclusion:			
Conclusion:			

Adderbury, Ambrosden, Arncott, Begbroke, Bletchingdon (*), Bloxham, Bodicote, Chesterton, Cropredy, Deddington, Finmere, **Fringford**, Fritwell, Hook Norton, Kidlington, Kirtlington, Launton, Milcombe, Sibford Ferris/Sibford Gower, Steeple Aston, Weston-on—the-Green (*), Wroxton, Yarnton

Village: Fringford Policies Map





Village: Finmere

Image 1: Aerial View of the Village (Potential Sites edged in red)



Village Constraints and Opportunities (See Appendix 1 for planning policy constraints)

- The village of Finmere lies to the south east of the District, with its eastern boundary contiguous with South Northamptonshire Council.
- The A421 runs to the south of the village.
- Land that separates the northern boundary and the A421 is too small to accommodate the scale of the proposals.

Sites Identified for Further Assessment

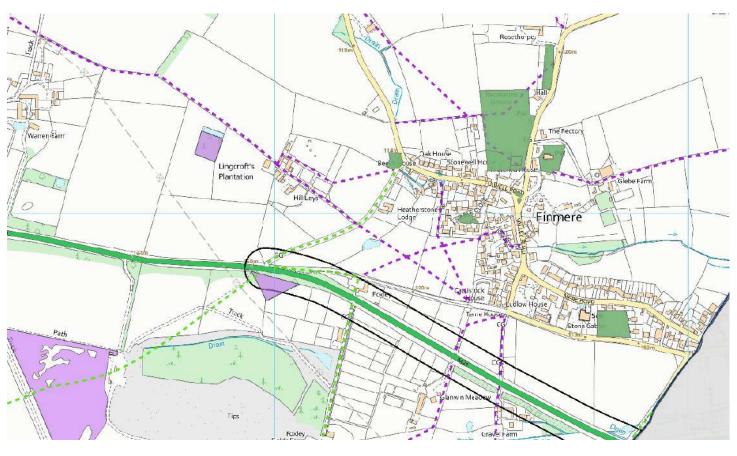
No sites identified.

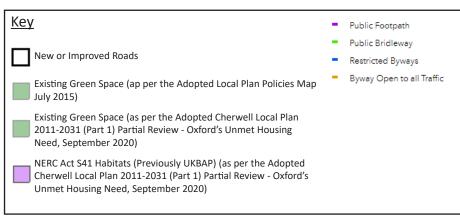
Stage 1						
	Yes	No				
Access. Is the settlement within close proximity to the motorway junction (within approximately 5 miles measured by road (preferably A road))?	N					
Conclusion: Not progressed to	Stage 2					
Stage 2						
	Site 1	Site 2	Site 3	Site 4	Site 5	Site 6
Are there potential suitable sites within the settlement?						
Are there potential suitable sites on the edge of the settlement?						
Conclusion:						
Stage 3						
Is the site a minimum of 10 Hectares?						
Conclusion:						
Stage 4						
Is the site affected by any of the below planning constraints?						
Area of Outstanding Natural Beauty						
Flood Risk Zone 2 /3						
Conclusion:						
Stage 5						
Site dimensions: suitability of site shape to operationally accommodate proposed development of c 27,500 sqm.						
Suitability of proposed development to the surrounding pattern of						

development in the context			
of the physical form of			
development.			
Suitability of the proposed			
development to the			
surrounding pattern of			
development to operationally			
accommodate the proposed			
development, e.g. HGV traffic			
movement.			
Conclusion:			
Stage 6			
If suitable, availability of the			
land.			
Conclusion:			
Conclusion:			

Adderbury, Ambrosden, Arncott, Begbroke, Bletchingdon (*), Bloxham, Bodicote, Chesterton, Cropredy, Deddington, **Finmere**, Fringford, Fritwell, Hook Norton, Kidlington, Kirtlington, Launton, Milcombe, Sibford Ferris/Sibford Gower, Steeple Aston, Weston-on—the-Green (*), Wroxton, Yarnton

Village: Finmere Policies Map





Village: Fritwell

Image 1: Aerial View of the Village (Potential Sites edged in red)



Village Constraints and Opportunities (See Appendix 1 for planning policy constraints).

- Fritwell is a village lying to the north west of Bicester.
- The village is included in the Mid-Cherwell Neighbourhood Plan.
- Fritwell Conservation Area extends to include almost the entire village with a small area to the south east excluded.
- The extent of the Conservation Area precludes this village from being able to accommodate the scale and operation requirements of the proposals.

Sites Identified for Further Assessment

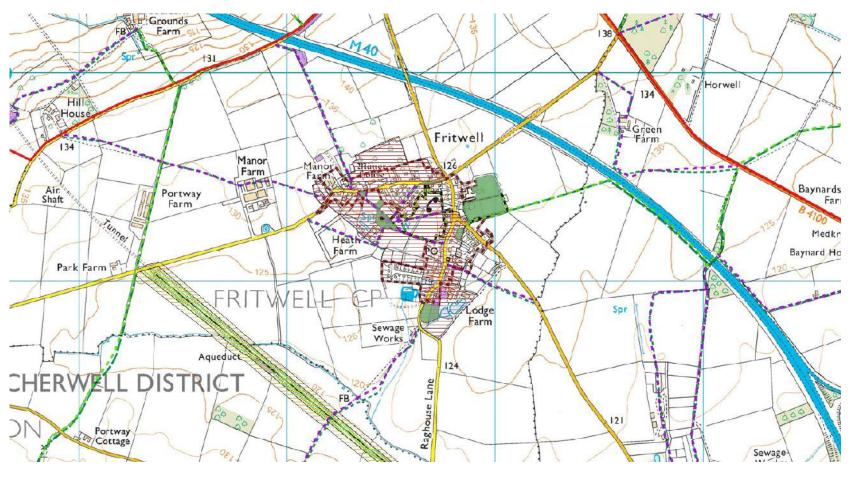
No sites identified.

Stage 1						
		<u> </u>	T			
	Yes	No				
Access. Is the settlement within close proximity to the motorway junction (within approximately 5 miles measured by road (preferably A road))?	Y					
Conclusion: Progressed to Stage	e 2					
Stage 2						
	Site 1	Site 2	Site 3	Site 4	Site 5	Site 6
Are there potential suitable sites within the settlement?	N					
Are there potential suitable sites on the edge of the settlement?	N					
Conclusion: Not progressed to	Stage 3					
Stage 3						
Is the site a minimum of 10 Hectares?						
Conclusion:						
Stage 4						
Is the site affected by any of the below planning constraints?						
Area of Outstanding Natural Beauty						
Flood Risk Zone 2 /3						
Conclusion:	1	1	ı			<u> </u>
Stage 5						
Site dimensions: suitability of site shape to operationally accommodate proposed development of c 27,500 sqm.						
Suitability of proposed development to the surrounding pattern of						

development in the context			
of the physical form of			
development.			
Suitability of the proposed			
development to the			
surrounding pattern of			
development to operationally			
accommodate the proposed			
development, e.g. HGV traffic			
movement.			
Conclusion:			
Stage 6			
If suitable, availability of the			
land.			
Conclusion:			
Conclusion:			

Adderbury, Ambrosden, Arncott, Begbroke, Bletchingdon (*), Bloxham, Bodicote, Chesterton, Cropredy, Deddington, Finmere, Fringford, **Fritwell**, Hook Norton, Kidlington, Kirtlington, Launton, Milcombe, Sibford Ferris/Sibford Gower, Steeple Aston, Weston-on—the-Green (*), Wroxton, Yarnton

Village: Fritwell Policies Map





Village: Hook Norton

Image 1: Aerial View of the Village (Potential Sites edged in red)



Village Constraints and Opportunities (See Appendix 1 for planning policy constraints)

- The village does not have access to an A road.
- Hook Norton Parish (HNP) has an adopted neighbourhood plan.
- Adjacent to the Cotswold Area of Outstanding Natural Beauty to the west. National Planning Policy only allows major development within the AONB in exceptional circumstances (paragraph 177).
- Designated Area of High Landscape Value.

Development prohibited at the southern, eastern and western boundary of the village due to the:

- Conservation Area extending to include most of the village.
- Swerford Listed Historic Park located to the south of the village (outside settlement boundary).
- SSSI to the south of the village (outside settlement boundary).
- Large area of Nature Conservation Target Areas to the south (outside settlement boundary).
- Local Wildlife Site to the south and east of the village.
- NERC Act S41 Habitat Designation to the east of the village along the old railway line.

Development prohibited at the northern and eastern boundary due to:

- Allocated green space on the villages southern boudary in the Local Plan.
- Remediation/heritage issues relating to the disused quarry.
- Ecology designation surrounding the disused quarry.

Sites Identified for Further Assessment

No sites identified due to the above constraints.

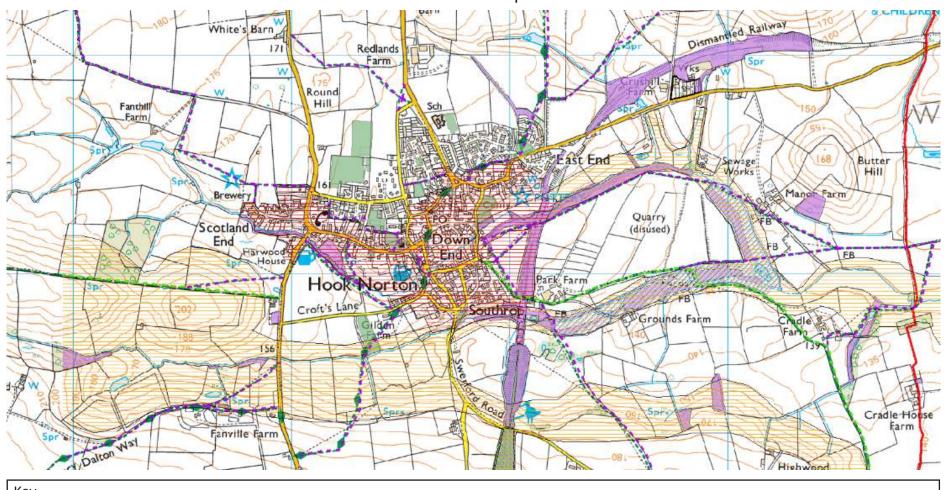
Table 2: Site Search Parameters

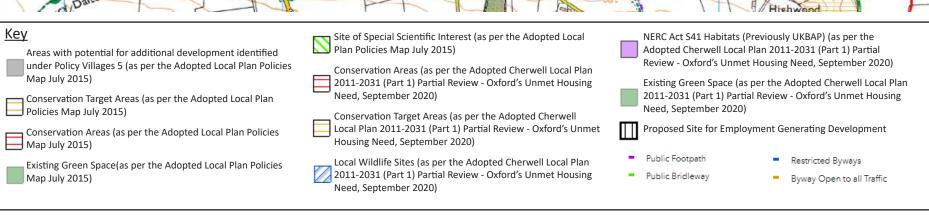
Stage 1						
	Yes	No				
Access. Is the settlement within close proximity to the motorway junction (within approximately 5 miles measured by road (preferably A road))?	N					
Conclusion: Not progressed to S	Stage 2					
Stage 2						
	Site 1	Site 2	Site 3	Site 4	Site 5	Site 6
Are there potential suitable sites within the settlement?						
Are there potential suitable sites on the edge of the settlement?						
Conclusion:						
Stage 3						
Is the site a minimum of 10 Hectares?						
Conclusion:						
Stage 4						
Is the site affected by any of the below planning constraints?						
Area of Outstanding Natural Beauty						
Flood Risk Zone 2 /3						
Conclusion:		•	l	l		
Stage 5						
Site dimensions: suitability of site shape to operationally accommodate proposed development of c 27,500 sqm.						
Suitability of proposed development to the surrounding pattern of development in the context						

of the physical form of			
development.			
Suitability of the proposed			
development to the			
surrounding pattern of			
development to operationally			
accommodate the proposed			
development, e.g. HGV traffic			
movement.			
Conclusion:			
Stage 6			
If suitable, availability of the			
land.			
Conclusion:			

Adderbury, Ambrosden, Arncott, Begbroke, Bletchingdon (*), Bloxham, Bodicote, Chesterton, Cropredy, Deddington, Finmere, Fringford, Fritwell, **Hook Norton**, Kidlington, Kirtlington, Launton, Milcombe, Sibford Ferris/Sibford Gower, Steeple Aston, Weston-on-the-Green (*), Wroxton, Yarnton

Village: Hook Norton Policies Map





Village: Kidlington

Image 1: Aerial View of the Village (Potential Sites edged in red)



Village Constraints and Opportunities (See Appendix 1 for planning policy constraints)

- Kidlington and the surrounding area lies within the Oxfordshire Green Belt.
- The proposed development subject of this Site Search on the edge of Kidlington would constitute inappropriate development in the Green Belt (paragraph NPPF 147). Inappropriate development in the Green Belt should not be approved except in 'very special circumstances' (paragraph NPPF 147).
- Policy SLE1 states that employment development in the rural area 'will be outside the Green Belt unless very special circumstances can be demonstrated'.
- The Green Belt test for 'very special circumstances' for a stand alone development, such as the proposed development would necessarily involve an assessment of the availability of land out with the Green Belt.
- The proposed Symmetry Park Ardley site is considered an alternative option in delivering the development, outside of the Green Belt. As such, 'very special circumstances' for land on the edge of Kidlington could not be demonstrated to allow Green Belt land to be released.
- The Green Belt designation surrounding the village precludes development in this location.

Sites Identified for Further Assessment

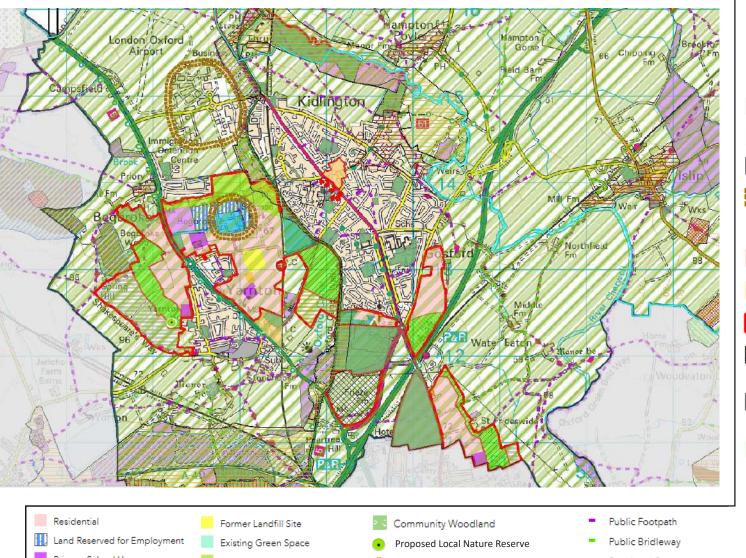
No sites identified due to the Green Belt constraints.

Stage 1						
		<u> </u>	T			
	Yes	No				
Access. Is the settlement within close proximity to the motorway junction (within approximately 5 miles measured by road (preferably A road))?	Y					
Conclusion: Progressed to Stage	e 2					
Stage 2						
	Site 1	Site 2	Site 3	Site 4	Site 5	Site 6
Are there potential suitable sites within the settlement?	N					
Are there potential suitable sites on the edge of the settlement?	N					
Conclusion: Not progressed to	Stage 3					
Stage 3						
Is the site a minimum of 10 Hectares?						
Conclusion:						
Stage 4						
Is the site affected by any of the below planning constraints?						
Area of Outstanding Natural Beauty						
Flood Risk Zone 2 /3						
Conclusion:	1	1	ı			<u> </u>
Stage 5						
Site dimensions: suitability of site shape to operationally accommodate proposed development of c 27,500 sqm.						
Suitability of proposed development to the surrounding pattern of						

development in the context			
of the physical form of			
development.			
Suitability of the proposed			
development to the			
surrounding pattern of			
development to operationally			
accommodate the proposed			
development, e.g. HGV traffic			
movement.			
Conclusion:			
Stage 6			
If suitable, availability of the			
land.			
Conclusion:			

Adderbury, Ambrosden, Arncott, Begbroke, Bletchingdon (*), Bloxham, Bodicote, Chesterton, Cropredy, Deddington, Finmere, Fringford, Fritwell, Hook Norton, **Kidlington**, Kirtlington, Launton, Milcombe, Sibford Ferris/Sibford Gower, Steeple Aston, Weston-on–the-Green (*), Wroxton, Yarnton

Village: Kidlington **Policies Map**



Primary School Use Local Nature Reserve Reserved Land for Railway Station/Halt Secondary School Use Nature Conservation Area **Existing Orchard** Local Centre New Green Space/Parks Oxford Canal Trail Existing Begbroke Science Park Retained Agricultural Land Outdoor Sports Provision Reserved Site for Golf Course Replacement

- Restricted Byways
- Byway Open to all Traffic
- Revised Green Belt



- Local Wildlife Sites (as per the Adopted Cherwell Local Plan 2011-2031 (Part 1) Partial Review - Oxford's Unmet Housing Need, September 2020)
- Existing Green Space (as per the Adopted Cherwell Local Plan 2011-2031 (Part 1) Partial Review - Oxford's Unmet Housing Need, September 2020)
- Ancient Woodland (as per the Adopted Cherwell Local Plan 2011-2031 (Part 1) Partial Review - Oxford's Unmet Housing Need, September 2020)
- Conservation Areas (as per the Adopted Cherwell Local Plan 2011-2031 (Part 1) Partial Review - Oxford's Unmet Housing Need, September 2020)

Village: Kirtlington

Image 1: Aerial View of the Village (Potential Sites edged in red)



Village Constraints and Opportunities (See Appendix 1 for planning policy constraints).

- Kirtlington is a small historic village 5 miles west of Bicester.
- The A4095 runs through the middle of the village, connecting with Bicester to the east and Kidlington and the A34 to the west.
- The Grade II park, Kirtlington Park, is contiguous with the villages western boundary which precludes development.
- The Village Conservation Area extends to cover almost all the village, with a small area to the north and east excluded. Numerous listed buildings are scattered across the village.

Sites Identified for Further Assessment

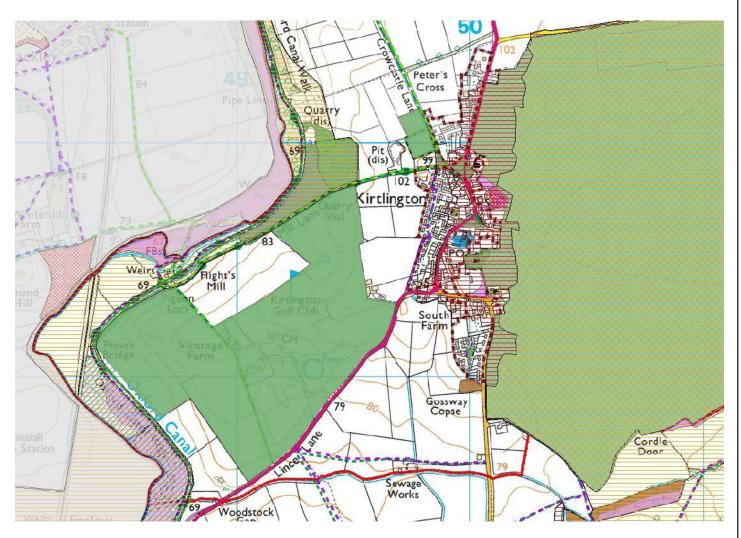
• No sites are identified.

Stage 1						
	Yes	No				
Access. Is the settlement within close proximity to the motorway junction (within approximately 5 miles measured by road (preferably A road))?	Y		6.5 miles			
Conclusion: Progressed to Stag	e 2					
Stage 2						
	Site 1	Site 2	Site 3	Site 4	Site 5	Site 6
Are there potential suitable sites within the settlement?	N					
Are there potential suitable sites on the edge of the settlement?	N					
Conclusion: Not progressed to	Stage 3	-	-		•	
Stage 3						
Is the site a minimum of 10 Hectares?						
Conclusion:		•		•		
Stage 4						
Is the site affected by any of the below planning constraints?						
Area of Outstanding Natural Beauty						
Flood Risk Zone 2 /3						
Conclusion:						
Stage 5						
Site dimensions: suitability of site shape to operationally accommodate proposed development of c 27,500 sqm.						
Suitability of proposed development to the surrounding pattern of						

development in the context			
of the physical form of			
development.			
Suitability of the proposed			
development to the			
surrounding pattern of			
development to operationally			
accommodate the proposed			
development, e.g. HGV traffic			
movement.			
Conclusion:			
Stage 6			
If suitable, availability of the			
land.			
Conclusion:			
Conclusion:			

Adderbury, Ambrosden, Arncott, Begbroke, Bletchingdon (*), Bloxham, Bodicote, Chesterton, Cropredy, Deddington, Finmere, Fringford, Fritwell, Hook Norton, Kidlington, **Kirtlington**, Launton, Milcombe, Sibford Ferris/Sibford Gower, Steeple Aston, Weston-on–the-Green (*), Wroxton, Yarnton

Village: Kirtlington Policies Map



Key Conservation Target Areas (as per the Adopted Local Plan Policies Map July 2015) Conservation Areas (as per the Adopted Local Plan Policies Existing Green Space(as per the Adopted Local Plan Policies Historic Park and Gardens (as per the Adopted Local Plan Policies Map July 2015) Ancient Woodlands (as per the Adopted Cherwell Local Plan 2011-2031 (Part 1) Partial Review - Oxford's Unmet Housing Need, September 2020) Conservation Target Areas (as per the Adopted Cherwell Local Plan 2011-2031 (Part 1) Partial Review - Oxford's Unmet Housing Need, September 2020) Local Wildlife Sites (as per the Adopted Cherwell Local Plan 2011-2031 (Part 1) Partial Review - Oxford's Unmet Housing Need, September 2020) Scheduled Ancient Monument (as per the Adopted Cherwell Local Plan 2011-2031 (Part 1) Partial Review - Oxford's Unmet Housing Need, September 2020) Historic Park and Gardens (as per the Adopted Cherwell Local Plan 2011-2031 (Part 1) Partial Review - Oxford's Unmet Housing Need, September 2020) NERC Act S41 Habitats (Previously UKBAP) (as per the Adopted Cherwell Local Plan 2011-2031 (Part 1) Partial Review - Oxford's Unmet Housing Need, September 2020) Existing Green Space (as per the Adopted Cherwell Local Plan 2011-2031 (Part 1) Partial Review - Oxford's Unmet Housing Need, September 2020) Neigbourhood Plan Area Important Amenity Green Spaces Local Green Spaces Local Open Spaces Settlement Area Settlement Boundary Public Footpath Public Bridleway Restricted Byways Byway Open to all Traffic

Village: Launton

Image 1: Aerial View of the Village (Potential Sites edged in red)



Village Constraints and Opportunities (See Appendix 1 for planning policy constraints)

- Launton is a village to the east of Bicester.
- Bicester Road runs through the centre of the village and connects to the A4421 Bicester ring road.
- There are a series of Listed Buildings along the High Street, which would preclude development to the south.
- Manor Farmhouse, a group of Grade II and Grade II* Listed Buildings are located on the edge of the north west boundary.

Sites Identified for Further Assessment

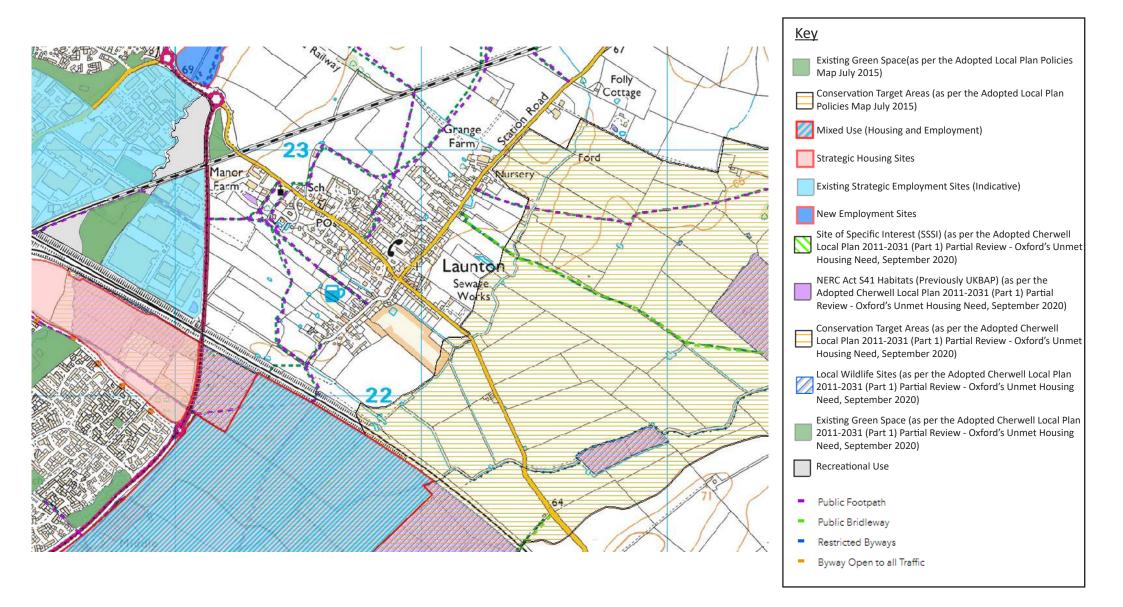
• Sites 1 and 2 to the south and west of the village have been identified as potential locations for development.

Stage 1						
	Yes	No				
Access. Is the settlement within close proximity to the motorway junction (within approximately 5 miles measured by road (preferably A road))?	Y					
Conclusion: Progressed to Stage	e 2					
Stage 2						
	Site 1	Site 2	Site 3	Site 4	Site 5	Site 6
Are there potential suitable sites within the settlement?	N	N				
Are there potential suitable sites on the edge of the settlement?	Y	Y				
Conclusion: Sites 1 & 2 progress	sed to Stage	e 3				
Stage 3						
Is the site a minimum of 10 Hectares (Capacity 92,903 sqm)?	Y (23.17 ha)	Y (21.24 ha)				
Conclusion: Sites 1 & 2 progress	sed to Stage	e 4			·	
Stage 4						
Is the site affected by any of the below planning constraints?						
Area of Outstanding Natural Beauty	N	N				
Flood Risk Zone 2 /3	N	N				
Conclusion: Sites 1 & 2 progress	sed to Stage	e 5		<u> </u>		
Stage 5						
Site dimensions: suitability of site shape to operationally accommodate proposed development of c 27,500 sqm.	Y	N				
Suitability of proposed development to the	N	N				

surrounding pattern of									
development in the context									
of the physical form of									
development.									
Suitability of the proposed	N	N							
development to the									
surrounding pattern of									
development to operationally									
accommodate the proposed									
development, e.g. HGV traffic									
movement.									
Conclusion: Site 1 would fill the gap between Launton and Bicester, which would erode the rural character									
of the village. Sites 1 and 2 wor	uld result in	an acceptak	ole impact or	n the adjacer	nt heritage as	ssets. Site 2 is a			
long narrow site and would un	suitable to a	ccommodat	te the type o	f developme	ent proposed	. The scale of			
the proposals would have an u	nacceptable	impact on t	the characte	r of the villaរុ	ge and it's se	tting. Site(s) not			
progressed to Stage 6.									
Stage 6									
						T			
If suitable, availability of the									
land.									
Conclusion:									

Adderbury, Ambrosden, Arncott, Begbroke, Bletchingdon (*), Bloxham, Bodicote, Chesterton, Cropredy, Deddington, Finmere, Fringford, Fritwell, Hook Norton, Kidlington, Kirtlington, Launton, Milcombe, Sibford Ferris/Sibford Gower, Steeple Aston, Weston-on–the-Green (*), Wroxton, Yarnton

Village: Launton Policies Map



Village: Milcombe

Image 1: Aerial View of the Village (Potential Sites edged in red)



Village Constraints and Opportunities (See Appendix 1 for planning policy constraints).

- The village does not have direct access to an A road. Direct access to the A361 could be attained as shown above (Sites 1 and 2).
- Development is precluded to the north as land is designated NERC Act S41 Habitats and Conservation Target Area.

Sites Identified for Further Assessment

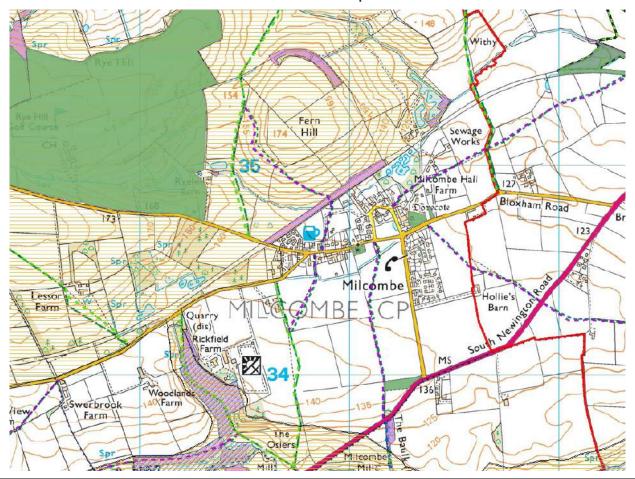
Site 1 and 2 identifed to the south of the village.

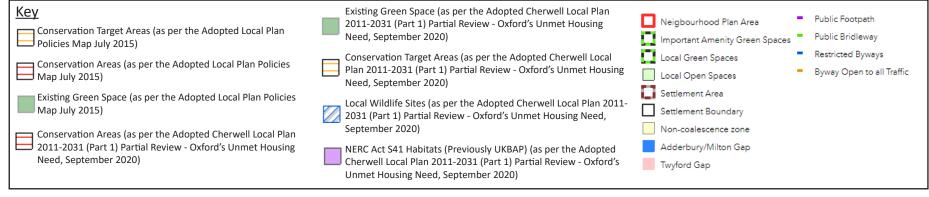
Stage 1									
	Yes	No							
Access. Is the settlement within close proximity to the motorway junction (within approximately 5 miles measured by road (preferably A road))?	Y								
Conclusion: Progressed to Stage	e 2								
Stage 2			1		1				
	Site 1	Site 2	Site 3	Site 4	Site 5	Site 6			
Are there potential suitable sites within the settlement?	N	N							
Are there potential suitable sites on the edge of the settlement?	Y	Y							
Conclusion: Sites 1 & 2 progress	sed to Stage	e 3							
Stage 3									
Is the site a minimum of 10 Hectares?	Y (20.51 ha)	Y (23.82 ha)							
Conclusion: Just under 50ha the	erefore Site	s 1 & 2 pro ₈	gressed to St	age 4					
Stage 4									
Is the site affected by any of the below planning constraints?									
Area of Outstanding Natural Beauty	N	N							
Flood Risk Zone 2 /3	N	N							
Conclusion: Sites 1 & 2 progress	sed to Stage	5	<u>I</u>	I.	<u>I</u>				
Stage 5									
Site dimensions: suitability of site shape to operationally accommodate proposed development of c 27,500 sqm.	Y	Y							
Suitability of proposed development to the surrounding pattern of	N	N							

development in the context						
of the physical form of						
development.						
Suitability of the proposed	N	N				
development to the						
surrounding pattern of						
development to operationally						
accommodate the proposed						
development, e.g. HGV traffic						
movement.						
Conclusion: The scale of the pro	posals wou	ıld adversel	y impact the	rural charac	ter and setti	ng of the village.
The A361 is not suitable for HG\	/s (particula	arly through	the adjacen	it village of S	outh Newing	gton). Site(s) not
progressed to Stage 6.						
Stage 6						
If suitable, availability of the						
land.						
Conclusion:						
Conclusion.						

Adderbury, Ambrosden, Arncott, Begbroke, Bletchingdon (*), Bloxham, Bodicote, Chesterton, Cropredy, Deddington, Finmere, Fringford, Fritwell, Hook Norton, Kidlington, Kirtlington, Launton, **Milcombe**, Sibford Ferris/Sibford Gower, Steeple Aston, Weston-on-the-Green (*), Wroxton, Yarnton

Village: Milcombe Policies Map





Village: Sibford Ferris & Sibford Gower

Image 1: Aerial View of the Village (Potential Sites edged in red)



Village Constraints and Opportunities (See Appendix 1 for planning policy constraints).

- Sibford Ferris lies to the south of the district, west of Banbury, with no access to an A road.
- The village western edge is in close proximity to the boundary with West Oxfordshire District Council.
- The village Conservation Area extends to include almost all of the village, with the exception of a small area of development to the north west of the village. The Conservation Area precludes the scale of the proposed development on the edge of the village.

Sites Identified for Further Assessment

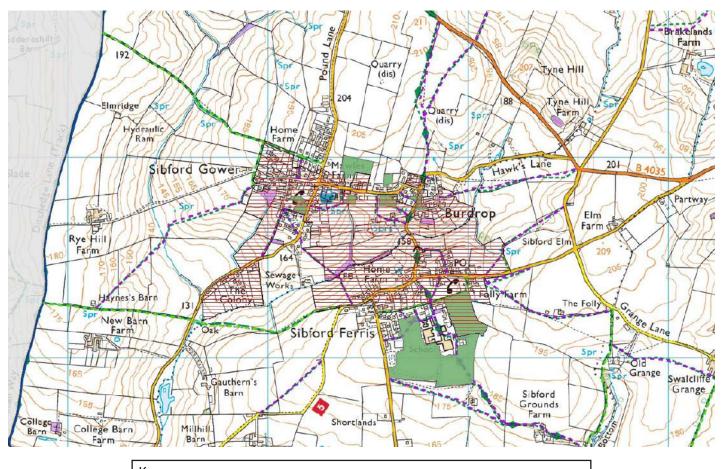
No sites identified.

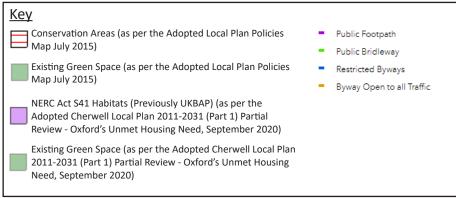
Stage 1							
	Yes	No					
Access. Is the settlement within close proximity to the motorway junction (within approximately 5 miles measured by road (preferably A road))?	N						
Conclusion: Not progressed to	Stage 2						
Stage 2							
	Site 1	Site 2	Site 3	Site 4	Site 5	Site 6	
Are there potential suitable sites within the settlement?							
Are there potential suitable sites on the edge of the settlement?							
Conclusion:							
Stage 3							
Is the site a minimum of 10 Hectares?							
Conclusion:							
Stage 4							
Is the site affected by any of the below planning constraints?							
Area of Outstanding Natural Beauty							
Flood Risk Zone 2 /3							
Conclusion:							
Stage 5							
Site dimensions: suitability of site shape to operationally accommodate proposed development of c 27,500 sqm.							
Suitability of proposed development to the surrounding pattern of							

development in the context			
of the physical form of			
development.			
Suitability of the proposed			
development to the			
surrounding pattern of			
development to operationally			
accommodate the proposed			
development, e.g. HGV traffic			
movement.			
Conclusion:			
Stage 6			
If suitable, availability of the			
land.			
Conclusion:			
Conclusion:			

Adderbury, Ambrosden, Arncott, Begbroke, Bletchingdon (*), Bloxham, Bodicote, Chesterton, Cropredy, Deddington, Finmere, Fringford, Fritwell, Hook Norton, Kidlington, Kirtlington, Launton, Milcombe, **Sibford Ferris/Sibford Gower**, Steeple Aston, Weston-on–the-Green (*), Wroxton, Yarnton

Village: Sibford Ferris Policies Map





Village: Steeple Aston

Image 1: Aerial View of the Village (Potential Sites edged in red)



Village Constraints and Opportunities (See Appendix 1 for planning policy constraints)

Steeple Aston is located towards the western edge of the District.

Development restricted at the eastern boundary edge of the village due to:

- The extensive Conservation Area extending to the Upper Heyford Air Base.
- Development would fill the gap between the village and Heyford Wharf, a small hamlet to the south.
- Potential adverse impact on the Oxford Canal Conservation Area.

Development restricted at the southern boundary edge due:

- The Conservation Area that extends to include most of the Village, with only a small area to the north and south excluded.
- Rousham Historic Park (Grade II Listed) is located to the south.
- Development on this village edge would adversly impact both the Conservation Area and the listed Parkland.

The nearest A road is the A4260 to the west of the village. There is no direct access, or means of providing such an access.

Sites Identified for Further Assessment

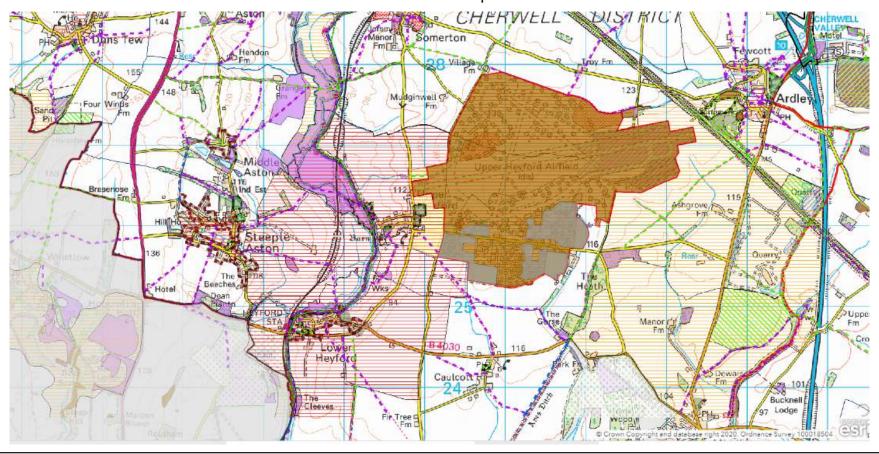
No Sites identified.

Stage 1								
Stage 1								
	Yes	No						
Access. Is the settlement within close proximity to the motorway junction (within approximately 5 miles measured by road (preferably A road))?	N							
Conclusion : Not progressed to s	Stage 2							
Stage 2								
	Site 1	Site 2	Site 3	Site 4	Site 5	Site 6		
Are there potential suitable sites within the settlement?								
Are there potential suitable sites on the edge of the settlement?								
Conclusion:								
Stage 3								
Is the site a minimum of 10 Hectares?								
Conclusion:								
Stage 4								
Is the site affected by any of the below planning constraints?								
Area of Outstanding Natural Beauty								
Flood Risk Zone 2 /3								
Conclusion:								
Stage 5								
Site dimensions: suitability of site shape to operationally								

accommodate proposed			
development of c 27,500 sqm.			
Suitability of proposed			
development to the			
surrounding pattern of			
development in the context			
of the physical form of			
development.			
Suitability of the proposed			
development to the			
surrounding pattern of			
development to operationally			
accommodate the proposed development, e.g. HGV traffic			
movement.			
Conclusion:			
Stage 6			
If suitable, availability of the	•		
land.			
Conclusion:			

Adderbury, Ambrosden, Arncott, Begbroke, Bletchingdon (*), Bloxham, Bodicote, Chesterton, Cropredy, Deddington, Finmere, Fringford, Fritwell, Hook Norton, Kidlington, Kirtlington, Launton, Milcombe, Sibford Ferris/Sibford Gower, **Steeple Aston**, Weston-on—the-Green (*), Wroxton, Yarnton

Village: Steeple Aston Policies Map





Village: Weston-on-the-Green

Image 1: Aerial View of the Village (Potential Sites edged in red)



Village Constraints and Opportunities (See Appendix 1 for planning policy constraints)

- The village does not have direct access to an A road.
- The Oxfordshire Green Belt extends to the southern and part of the western boundaries where development is restricted except in very special circumstances.
- The proposed Symmetry Park Ardley site is considered an alternative option in delivering the development, outside of the Green Belt. As such, 'very special circumstances' for land on the western boundary of the village, could not be demonstrated to allow Green Belt land to be released.
- The Conservation Area extends to include almost all of the village. This would preclude development on the eastern, southern and western boundaries.

Sites Identified for Further Assessment

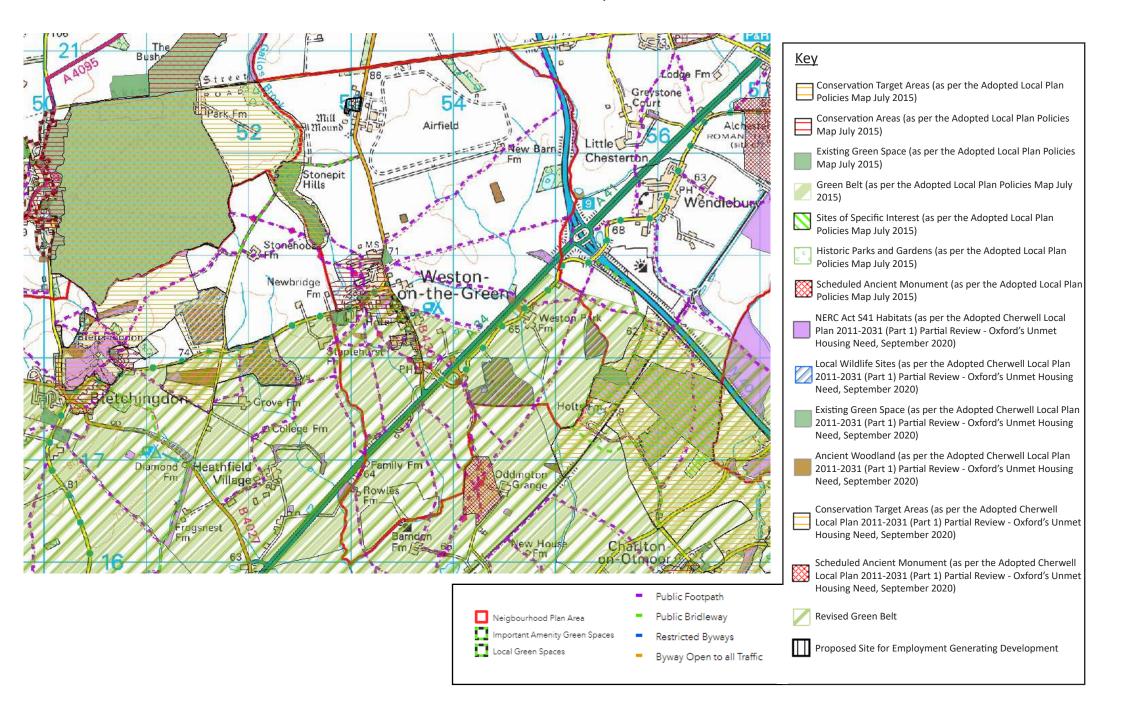
No sites identified.

Stage 1							
	Yes	No					
Access. Is the settlement within close proximity to the motorway junction (within approximately 5 miles measured by road (preferably A road))?	Y						
Conclusion: Progressed to Stag	e 2						
Stage 2							
	Site 1	Site 2	Site 3	Site 4	Site 5	Site 6	
Are there potential suitable sites within the settlement?	N						
Are there potential suitable sites on the edge of the settlement?	N						
Conclusion: Not progressed to	Stage 3						
Stage 3							
Is the site a minimum of 10 Hectares?							
Conclusion:							
Stage 4							
Is the site affected by any of the below planning constraints?							
Area of Outstanding Natural Beauty							
Flood Risk Zone 2 /3							
Conclusion:							
Stage 5							
Site dimensions: suitability of site shape to operationally accommodate proposed development of 27,500 sqm.							
Suitability of proposed development to the							

surrounding pattern of development in the context of the physical form of development.			
Suitability of the proposed development to the surrounding pattern of development to operationally accommodate the proposed development, e.g. HGV traffic movement.			
Conclusion:			
Stage 6			
If suitable, availability of the land.			
Conclusion:			

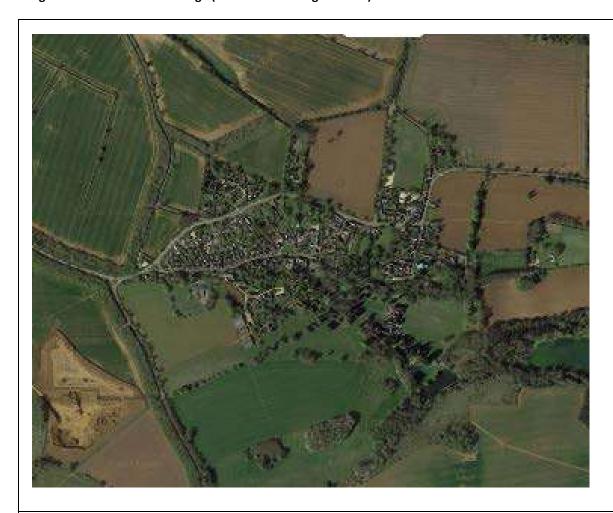
Adderbury, Ambrosden, Arncott, Begbroke, Bletchingdon (*), Bloxham, Bodicote, Chesterton, Cropredy, Deddington, Finmere, Fringford, Fritwell, Hook Norton, Kidlington, Kirtlington, Launton, Milcombe, Sibford Ferris/Sibford Gower, Steeple Aston, **Weston-on-the-Green** (*), Wroxton, Yarnton

Village: Weston-on-the-Green Policies Map



Village: Wroxton

Image 1: Aerial View of the Village (Potential Sites edged in red)



Village Constraints and Opportunities (See Appendix 1 for planning policy constraints)

- The A422 runs though the centre of the village, connecting the village with Banbury to the east and Stratford-upon-Avon to the west.
- The Wroxton Conservation Area extends to include the whole village.
- The Wroxton Conservation Area extends to include Wroxton Parkland that separates the village and the western urban edge of Banbury.
- Wroxton Abbey Parkland is a designated Grade II* listed building and parkland.

Sites Identified for Further Assessment

No sites identified due to the above constraints.

Table 2: Site Search Parameters

Constraints and Requirements

Stage 1						
	Yes	No				
Access. Is the settlement within close proximity to the motorway junction (within approximately 5 miles measured by road (preferably A road))?	N					
Conclusion: Not progressed to	Stage 2					
Stage 2						
	Site 1	Site 2	Site 3	Site 4	Site 5	Site 6
Are there potential suitable sites within the settlement?						
Are there potential suitable sites on the edge of the settlement?						
Conclusion:						
Stage 3						
Is the site a minimum of 50 Hectares (Capacity 92,903 sqm)?						
Conclusion:	1		1			
Stage 4						
Is the site affected by any of the below planning constraints?						
Area of Outstanding Natural Beauty						
Flood Risk Zone 2 /3						
Conclusion:						
Stage 5						
Site dimensions: suitability of site shape to operationally accommodate proposed development of c 27,500 sqm.						
Suitability of proposed development to the						

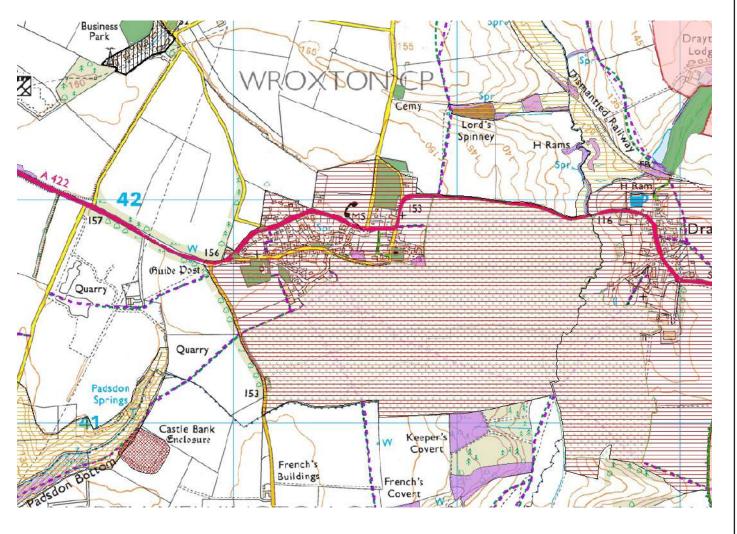
surrounding pattern of development in the context of the physical form of development.			
Suitability of the proposed development to the surrounding pattern of development to operationally accommodate the proposed development, e.g. HGV traffic movement.			
Conclusion:			
Stage 6			
If suitable, availability of the land.			
Conclusion:			

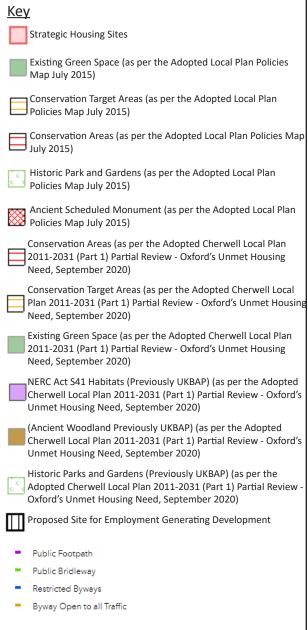
Category Villages by Category A Service Villages Minor Development:

Adderbury, Ambrosden, Arncott, Begbroke, Bletchingdon (*), Bloxham, Bodicote, Chesterton, Cropredy, Deddington, Finmere, Fringford, Fritwell, Hook Norton, Kidlington, Kirtlington, Launton, Milcombe, Sibford Ferris/Sibford Gower, Steeple Aston, Weston-on—the-Green (*), **Wroxton**, Yarnton

(*) Denotes villages partly within and partly outside the Green Belt.

Village: Wroxton Policies Map





Village: Yarnton

Image 1: Aerial View of the Village (Potential Sites edged in red)



Village Constraints and Opportunities (See Appendix 1 for planning policy constraints)

- Yarnton and the surrounding area lies within the Oxfordshire Green Belt.
- The proposed development subject of this Site Search on the edge of Yarnton would constitute inappropriate development in the Green Belt (paragraph NPPF 147). Inappropriate development in the Green Belt should not be approved except in very 'special circumstances' (paragraph NPPF 147)
- Policy SLE1 states that employment development in the rural area 'will be outside the Green Belt unless very special circumstances can be demonstrated'.
- The Green Belt test for 'very special circumstances' for a stand alone development, such as the proposed development, would necessarily involve the assessment of the availability of land out with the Green Belt.
- The proposed Symmetry Park Ardley site is considered an alternative option in delivering the development, outside of the Green Belt. As such, 'very special circumstances' for land on the edge of Yarnton could not be demonstrated to allow Green Belt land to be released.
- The Green Belt designation of the village and surrounding area precludes development.

Sites Identified for Further Assessment

No sites identified.

Table 2: Site Search Parameters

Constraints and Requirements

Stage 1						
	Yes	No				
Access. Is the settlement within close proximity to the motorway junction (within approximately 5 miles measured by road (preferably A road))?	N					
Conclusion : Not progressed to	Stage 2					
Stage 2		_		_	_	
	Site 1	Site 2	Site 3	Site 4	Site 5	Site 6
Are there potential suitable sites within the settlement?						
Are there potential suitable sites on the edge of the settlement?						
Conclusion:						
Stage 3						
Is the site a minimum of 50 Hectares (Capacity 92,903 sqm)?						
Conclusion:					·	
Stage 4						
Is the site affected by any of the below planning constraints?						
Area of Outstanding Natural Beauty						
Flood Risk Zone 2 /3						
Conclusion:						
Stage 5						
Site dimensions: suitability of site shape to operationally accommodate proposed development of c 27,500 sqm.						
Suitability of proposed development to the						

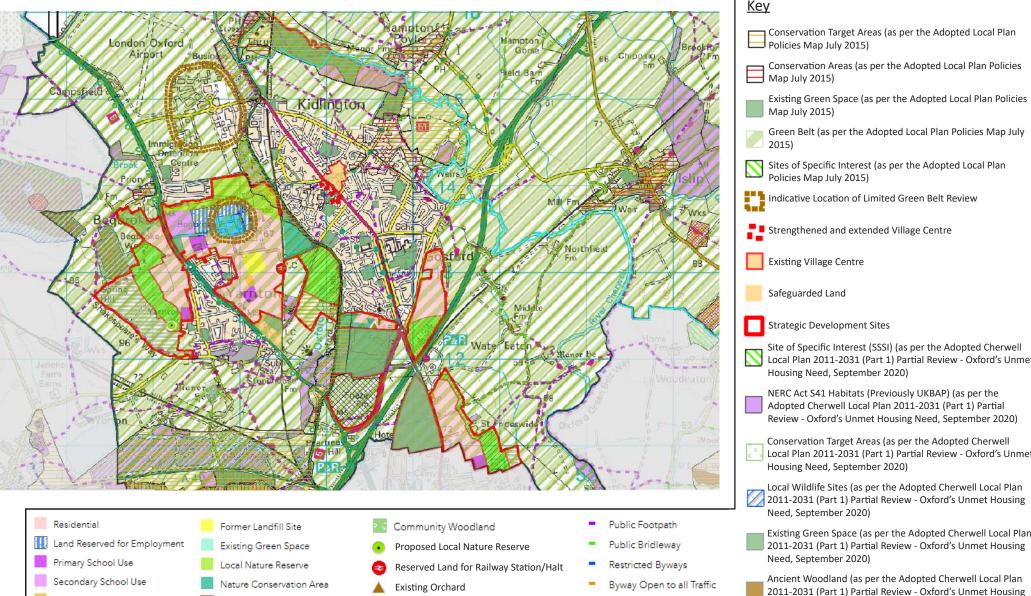
surrounding pattern of development in the context of the physical form of development.			
Suitability of the proposed development to the surrounding pattern of development to operationally accommodate the proposed development, e.g. HGV traffic movement.			
Conclusion:			
Stage 6			
If suitable, availability of the land.			
Conclusion:			

Category Villages by Category A Service Villages Minor Development:

Adderbury, Ambrosden, Arncott, Begbroke, Bletchingdon (*), Bloxham, Bodicote, Chesterton, Cropredy, Deddington, Finmere, Fringford, Fritwell, Hook Norton, Kidlington, Kirtlington, Launton, Milcombe, Sibford Ferris/Sibford Gower, Steeple Aston, Weston-on—the-Green (*), Wroxton, **Yarnton**

(*) Denotes villages partly within and partly outside the Green Belt.

Village: Yarnton **Policies Map**



Oxford Canal Trail

Local Centre

Existing Begbroke Science Park

Outdoor Sports Provision

New Green Space/Parks

Retained Agricultural Land

Reserved Site for Golf Course Replacement



Need, September 2020)

Need, September 2020)

Conservation Areas (as per the Adopted Cherwell Local Plan

2011-2031 (Part 1) Partial Review - Oxford's Unmet Housing

Revised Green Belt

APPENDIX 2

Issued Raised	Response
· ·	
Sustainability Any development at this site is not a sustainable option – while it is situated adjacent to major roads, there is no public transport accessing the site, and employees and vehicles would add to the current road use, which is already over capacity.	The Transport Topic Paper sets out the Sustainable Transport Strategy for the proposals and summarises, in achieving sustainable development, the NPPF confirms the planning system has three overarching interdependent objectives. These are stated at paragraph 8 to be: • an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure • a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and • an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy. The NPPF Paragraph 85 states: 'Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.'
	Sustainability Any development at this site is not a sustainable option – while it is situated adjacent to major roads, there is no public transport accessing the site, and employees and vehicles would add to the current road use,

With the NPPF paragraph 8 objectives in mind, paragraph 109 states from a transport perspective that:

'...Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. However, opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision making.'

When the NPPF refers to sustainable transport modes, it is worthy to take into account the definition that is provided in its Glossary which is namely:

'Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, ultra low and zero emission vehicles, car sharing and public transport.'

Moreover, paragraph 89 of the NPPF states:

'Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or **by public transport**). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.' (our emphasis).

In the context of the comments received from OCC, and particularly in relation to the provision of a pedestrian and cycle route to Bicester, it is important to recognise that the NPPF makes a very clear distinction that opportunities to provide enhanced sustainable transport measures varies depending on where a site is located. In a similar regard, it is clear that an appropriate balance needs to be identified in so much as the core objectives of sustainable development, as identified by the NPPF can be achieved.

From a freight industry perspective, which this development will make a positive contribution towards, it is of course pertinent to recognise that they will inevitably generate additional HGV movements. To this end, both National (i.e. NPPF) and Regional policy (i.e. OCC Freight and Logistics Strategy) direct such development to be located adjacent to the Strategic Road Network.

Paragraph 87 of the NPPF states:

'Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.' (our emphasis)

Paragraph 87 is supported by NPPG (paragraph: 031 Reference ID: 2a-031-20190722 (Revision date: 22 07 2019), which states that:

'The logistics industry plays a critical role in enabling an efficient, sustainable and effective supply of goods for consumers and businesses, as well as contributing to local employment opportunities, and has **distinct locational requirements** that need to be considered in formulating planning policies (separately from those relating to general industrial land)." (our emphasis)

In the case of Regional policy, OCC has developed a Freight Map (see Appendix C), which shows the proposed development is well located to this and therefore are well placed to abide by the following objective:

'We will seek to influence the location and design of new development, particularly employment sites and any related transport infrastructure, so that these can function well, with appropriate freight access to and from the strategic transport network without adverse impacts on local communities, other road users and the environment. This includes ensuring new developments incorporate the needs of emerging technologies.'

The England Economic Heartland report 'Connecting People Transforming Journeys' (2021) Policy 35 states that: 'We will work with Highways England, local highway authorities, local planning authorities and the freight sector to ensure that strategic corridors for road freight and logistics are fit for purpose: priority will be given to the following corridors: the M25/M1; the A34 and M40 north of Oxford; the A1 corridor (north of Huntingdon); the A14; and the A508 into Northampton.' (our emphasis)

The report states that they will work with Highways England, local highways authorities and the freight sector to ensure the key parts of the Strategic Road and Major Road Networks continue to support the movement of road haulage and thereby minimise the impact of road freight on local communities.

The key criteria for a successful logistics site are: motorway proximity; junction access; connectivity to road, rail, air and sea; as well as the size of the site and the potential quantum of accommodation. Economic and labour market considerations are also key drivers for the suitability of a site and location as a logistics hub, in addition to the transport links and connectivity that the site benefits from.

The development will provide high quality logistics floorspace in location ideally placed to address the growing need for logistics floorspace as it will be highly accessible to the strategic road network (which as set out above is a fundamental requirement of logistics operators).

It is clear from the respective national and regional strategies for freight, that there is a general direction to locate developments, such as those proposed by AL and TSL, adjacent to key strategic routes and away from sensitive urban communities. Invariably this will result in logistics sites being located in areas that are more rural in appearance and function.

To this end, the measures that could reasonably be expected to be required to make a site more sustainable are limited, particularly in the context of OCC's acceptance that the consequences of supporting infrastructure should not have an adverse effect on the environment and other road users. Equally, paragraph 89 of the NPPF makes a clear distinction that not all modes of transport need to be upgraded to enhance the overall sustainability of a rurally located development.

With this in mind, and taking into account feedback provided by OCC to date, Tritax are committed to the promotion of sustainable travel. The improvements committed in the planning proposals include:

- 25% of total parking to provide active EV charging spaces on both the AL and TSL schemes, which accords with current OCC guidance.
- New bus stops on the B4100 in-between the AL eastern and TSL site accesses, which have been designed in accordance with current OCC guidance.
- A new bus stop in the western AL development, which accords with current OCC design guidance.
- Financial contributions towards upgrading an existing bus route that operates between Bicester and Brackley in line with a methodology calculated by OCC Public Transport officers, which identifies a figure of £2,133,333.
- Dedicated active mode infrastructure between the respective sites and the dedicated crossing facilities incorporated into an upgraded Banyards Green roundabout junction, which is discussed

in greater detail below and responds to the request of OCC to cater for trips to/from the adjacent local services.

The submitted Framework Travel Plan contains details of the measures incorporated to reduce the impact of transport associated with the development.

No other measures are required to mitigate significant effects of the proposals. However, in addition to the above, the following potential measures are being explored:

- Financial contributions towards a further upgrade to the existing Bicester to Brackley bus service that would result in a further £1,800,000 being required in line with a methodology calculated by OCC Public Transport officers;
- Financial contributions towards enhancing access to the Public Rights of Way network; Creation of a new pedestrian and cycle route to/from Bicester along the B4100, having regard to the acceptable specifications provided by OCC on 20th October 2023 (see Appendix D) 1; and,
- Upgrading bus waiting areas within Bicester to incorporate cycle parking facilities at bus stops
 that serve the existing bus route that operates between Bicester and Brackley, which allows
 residents of Bicester to undertake a longer distance journey by a combined cycle and public
 transport trip.

Paragraph 114 of the NPPF states that in assessing specific applications for development, it should be ensured that, inter alia, appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location. It is the view of Tritax that recognising the specific location requirements of the logistics sector, the schemes exploit the available opportunities to make the schemes suitably accessible by appropriate sustainable travel modes.

The Transport Assessment Addendum for the application concludes:

Appropriate opportunities to promote sustainable transport modes have been taken up, given
the type of development and its location. In particular, the site will provide two new bus stops
with contributions provided to an enhanced bus service, opportunities to provide a shared
foot/cycleway link to Bicester have been explored, and, a trim trail will be provided at the TSL
development for use by staff;

2.	Visual Intrusion Any development would be	 Safe and suitable access to the site can be achieved for all users. This has been confirmed through the Stage 1 RSA of the proposed access arrangement which incorporates active travel facilities alongside being designed for all vehicles that are expected to require access to the site. The design of streets, parking areas, other transport elements and the content of associated standards will reflect the guidance in place at the time of a reserved matters application. This will include parking provision for cars, electric vehicles, cycles and HGVs. The impacts of the development on the transport network in terms of capacity, congestion and highway safety have been addressed and mitigated, in particular through an improvement scheme at the Baynards Green roundabout. The submission has been amended as follows: Minor amendments to the unit heights of the proposed development. The proposed unit heights
	visually intrusive (as stated by the Inspector at the 2015 Local Plan Inquiry) 'in the open countryside due to the size of the buildings, as well as potentially difficult and/or expensive to cater for satisfactorily at the M40 junctions in highway capacity terms' (para 41).	are: Building heights, overall, the main built structures would be up to a maximum of 140.350 m AOD in Zone A1; 137.350 m AOD in Zone A2; and a maximum of 134.415 m AOD in Zone B; Introduction of the strategic landscape bund and enhanced planting along the eastern boundary: as a result of the assessment, and comments raised on the 2022 submission, the developable area was moved away from the boundary, resulting in a minimum buffer distance from the eastern planning boundary of 45.100m (Zone A) and a minimum buffer distance from the eastern boundary of 138.3m (Zone B); The strategic landscape bunds having been increased in height, with minimum heights now proposed. The strategic landscape bund in Zone A has a minimum top of bund height of 119.200 m AOD and in Zone B minimum top of bund height of 116.500 m AOD. Landscaping proposals have been updated to reflect the above; An updated Landscape and Visual Impact Assessment (LVIA) accompanies this amended submission. The LVIA and the proposed mitigation measures shown on the illustrative landscape strategy plan which include areas of new trees around the edges of the Site, particularly to the east which will also comprise a bund, and new hedge planting within the Site. The illustrative landscape and planting strategy will help integrate the development into the landscape and contribute to achieving local landscape character objectives, although some loss of openness and landscape features will result. The Proposed Development will have no significant adverse impact on the surrounding area.

The LVIA concludes that:

'The landscape within the study area is predominately flat to the north and gently undulating to the east, containing a mix of rural features and peri-urban uses, resulting in limited opportunities for views of the Site. In consideration of the impacts on the visual amenity of people, views towards the Site are often obscured by mature landscape features within a flat and gently undulating landscape. The assessment finds that, due to this visual screening, there would be limited long-term impacts on publicly accessible areas, including highways and PRoW.

Significant residual impacts are predicted for receptors using PRoW in close proximity to the Site, as well as residents in close proximity to it; and where the property may afford a view looking west as many are well contained by mature landscape features.

In the wider context, the low number of significant landscape and visual effects confirm the extent to which strategic planting incorporated into the Proposed Development would mitigate views, retaining and reinforcing the characteristic landscape fabric and pattern of the Site and assimilating the Proposed Development, as far as possible, into the peri-urban and rural landscape context.

The cumulative assessment identified that some in-combination views of the Proposed Development and the neighbouring commercial development site are predicted, predominantly where receptors are in close proximity to both the Proposed Development and the neighbouring commercial development site within the landscape to the north of the A43 and east of the M40. However, where the cumulative assessment identified effects that differ from that set out within the main Landscape and Visual Assessment, in all cases, these effects align with those set out within the LVIA submitted for the neighbouring commercial development site.'

An illustrative landscape strategy has been prepared to mitigate the potential landscape and visual impacts of the development and to provide an attractive setting for future occupiers, which will guide and inform all future reserved matters Applications. The proposed landscape and planting strategy will help integrate the Proposed Development. Planting will comprise locally native species or species that reflect the landscape character.

		A buffer of a minimum of 45.1 metres wide will be established along the eastern boundary of the Site (at its widest the buffer will be over 200 metres wide). This will connect to the existing woodlands to the north and south and provide significant visual screening along the eastern boundary for the proposed built development. [check final] The LVIA concludes that the Proposed Development will result in non-significant effects on landscape character. The proposed landscape and planting strategy will help integrate the development into the landscape and contribute to achieving local landscape character objectives, although some loss of openness and landscape features will result. The Proposed Development will secure appropriate mitigation and will not cause undue harm to important natural landscape features and topography; impact on areas judged to have a high level of tranquillity, harm the setting of settlements, buildings, structures or other landmark features or harm the historic value of the landscape.
3.	Location	Please see the response to 2. above.
	While the site is located close to	
	the strategic highway network,	
	this does not in itself justify the	
	location as buildings (as	
	observed by Inspector K Ford	
	when dismissing the appeal	
	against refusal of planning	
	application ref 18/00672/OUT),	
	who noted that the proposal	
	would: 'lead to an urbanisation	
	of the site This is regardless of whether it is deemed large or	
	small in scale" (para 18) The	
	inspector "consequently	
	disagree(d) with the LVIA	
	[Landscape Visual Impact	
	Assessment] that the proposal	
	would not have an unacceptable	
	visual impact' (para 19) 'Whilst	
	the roads and <i>neighbouring</i>	

	T	
	petrol station and drive-thru	
	have eroded the landscape	
	quality of the area, the harm	
	would be compounded by the	
	development in an area that	
	otherwise has an open	
	character with open fields of	
	which the site forms part. The	
	impact of the surrounding	
	development does not weigh in	
	favour of the proposal and does	
	not justify further exacerbation	
	of the harm the proposal	
	would make a significant	
	contribution in urbanising the	
	junction to an unacceptable	
	degree' (para 20) 'The proposal	
	would harm the character and	
	appearance of the area It	
	would also conflict with saved	
	Policy C8 of the Cherwell Local	
	Plan 1996 which resists sporadic	
	development in open	
	countryside, including	
	developments in the vicinity of	
	the motorway or major road	
	junctions' (para 21).	
4.	Not appropriate	With regards to the exceptional circumstances for the development, the planning statement note that adopted
	The proposal would lead to the	Cherwell Local Plan policy SLE1 states "Unless exceptional circumstances are demonstrated, employment
	creation of a significant amount	development in the rural areas should be located within or on the edge of those villages in Category A (see
	of commercial floor space in a	Policy Villages 1)" therefore the policy does envisage the possibility of exceptional circumstances requiring new
	geographically unsustainable	employment land to be released. The policy test is therefore for the Applicant to show exceptional
	location. The development is	circumstances to justify, in principle the need for new employment development on unallocated land.
		, , , , , , , , , , , , , , , , , , ,

	not in accordance with Local	Therefore, the planning statement sets out the exceptional circumstances for accommodating this
	plan proposals, and the applicant has not demonstrated	development, in short, the urgent need for more land to accommodate logistics floorspace.
	any exceptional circumstances for the development. The	The fact that there is no suitable allocated or committed sites available that meet this investment requirement is in itself a crucial consideration in establishing 'exceptional circumstances'.
	development should be in a more sustainable locations.	The phrase 'exceptional circumstances' should be given its ordinary meaning within the proper context, and means 'much greater than usual'. The development plan anticipated that employment development needs would ordinarily be met on allocated or committed sites but has acknowledged that 'exceptional circumstances' may exist justifying in principle the provision of employment on an unallocated site, i.e., the development plan envisages that sites may come forward on unallocated sites in rural areas.
		The development would build on existing local economic strengths in the logistics sectors, making a readily deliverable, achievable and highly significant contribution to a strong and competitive regional economy, as already demonstrated by the success of the other logistics development, for example, at Banbury (also by these applicants) which is fully occupied.
		Rapid increase in the number of logistics businesses in this market has resulted in employment land being in particularly short supply. Demand evidently also extends beyond warehousing and distribution, as production returns to the UK post Brexit, and operators seek locations with good access and labour supply.
		A substantial planning need exists for major logistics development of the kind proposed in this application. The broad evidence of need for the type of employment land represented by the Application Site is material to the consideration of this application.
		For the reasons set out above 'exceptional circumstances' have been demonstrated in compliance with Policy SLE1.
5.	Traffic implications The traffic impacts of the development must robustly	The Addendum Environmental Statement and the associated Addendum Transport Assessment demonstrate that the Proposed Development can be carried out without undue detriment to the highway network.
	assessed within any Transport Assessment particularly in	An updated Transport Assessment has been submitted, in summary this concludes that the be assessed impacts of the development on the transport network in terms of capacity, congestion and highway safety have

	regard to the impact on the junction into the site when approach along the B4100. This is a highway which is already over used, leading onto junction 10 of the M40. The road network at this point cannot accommodate more traffic into the area.	been addressed and mitigated, in particular through an improvement scheme at the Baynards Green roundabout and that it has been demonstrated that the proposals both individually and cumulatively with national and regional planning policy and therefore it is concluded that the proposals are entirely acceptable from a highways and transportation perspective
6.	Cumulative impact of developments in the area The Parish Council is aware of major development proposals in the area, including the	Schedule 4(5)(e) of the 2017 EIA Regulations requires a description of the likely significant effects of the development on environment resulting from 'the cumulation of effects with other existing and/or approved projects, taking into account any existing environmental problems relating to areas of particular environmental importance likely to be affected or the use of natural resources'.
	Dorchester new Town, work to upgrade Junction 10 of the M40 and proposals for a strategic	A list of approved developments which need to be addressed cumulatively has been agreed with the Council and the highways authorities.
	rail/freight interchange near Ardley. The cumulative effects on residents and the road network will be completely unacceptable.	Therefore, the Addendum Environmental Impact Assessment and the Addendum Transport Assessment submitted as part of the planning application assesses the cumulative effects of the development, and the potential for likely significant effects on the environment resulting from developments in the area coming forward at the same time as the Proposed Development have been considered and the mitigation package proposed accommodates any cumulative impacts identified.
B. F	Fringford	
7.	The proposed large scale logistics site is on green-belt land which should be resisted. The number and scale of similar developments is negatively	The Site is not located in the Green Belt. As stated above, the Addendum Environmental Impact Assessment and the Addendum Transport Assessment submitted as part of the planning application assesses the cumulative effects of the development, and the potential for likely significant effects on the environment resulting from developments in the area coming
	swamping rural North Oxfordshire at a rapid rate with an over-bearing, dominant impact on the visual, natural landscape and environment.	forward at the same time as the Proposed Development have been considered.

	<u> </u>	
	The amount of such logistical	
	development in the area of	
	Cherwell District Council	
	appears to be disproportionate	
	to other areas.	
8.	There will be a significant	The planning application is accompanied by an Extended Phase 1 survey and detailed (Phase 2) surveys relating
	negative impact on biodiversity	to breeding birds, roosting and foraging/commuting bats, otter, water vole, badger, reptiles, great crested newts,
	and wildlife of the area which is	and hairstreak butterflies.
	rural in character made up of	
	agricultural fields, currently	There are no internationally designated sites within 10km. There is one biological statutory designated site within
	supporting wildlife. The huge	5km of the Site, Ardley Cutting and Quarry Site of Special Scientific Interest (SSSI), although given the distances
	scale of this proposed	involved and separation by the M40, it is not considered there would be any negative impacts on this SSSI as a
	development will bring	result of the Proposed Development.
	additional noise, sound and	
	light pollution to the area.	There are four non-statutory designated Local Wildlife Sites (LWS) within 2km of the Site: Stoke Bushes LWS, Stoke
	ingrit portation to the area.	Wood LWS and Stoke Little Wood LWS and Tusmore and Shellswell Park Biodiversity Opportunity Area (BOA). Of
		these, only Stoke Bushes LWS and the Shellswell Park BOA is considered, in the absence of appropriate mitigation,
		to be at risk of adverse effects as a result of the Proposed Development.
		to be at risk of adverse effects as a result of the Proposed Development.
		The majority of the Site comprises large, intensive arable fields sown with commercial cereal crops that are of
		negligible ecological importance. The arable fields are enclosed by a network of native hedgerow with a number
		of associated mature trees that are of Site to Local Ecological Importance.
		of associated mature trees that are of site to bear belongied importance.
		In terms of Protected and Priority Species, surveys have confirmed the presence of populations of breeding birds,
		foraging/commuting bats, badgers and brown hairstreak butterfly (Thecla betulae) within the Site.
		Toruging, commuting satis, saugers and shorm handical satisfies a second of memorial satisfies
		Chapter 8 Ecology of the ES assessed the impact of the Proposed Development at the construction and the
		operational phases of the Proposed Development. The ES concluded that with mitigation in the form of a
		Construction Environmental Management Plan (CEMP), and the Ecological Construction Method Statement
		(ECMS), the impact during the construction phase on the designated sites, habitats and vegetation, fauna, and
		species will be negligible. Chapter 8 of the ES sets out additional mitigation measures required during the
		construction phase.
		Constituction phase.

		The parameters plan ensures that a minimum of 13.6ha, of the Site area, will be devoted to open space and managed for biodiversity purposes. Additional landscaping and open space will also be provided within the developable area once final site layouts are fixed at Reserved Matters stage, further increasing the biodiversity potential of the proposals.
		Aspects of the detailed design which are especially relevant and can be secured through a suitably worded planning condition are: lighting designed to avoid impacts on nocturnal wildlife, the surface water drainage system designed to maintain/improve water quality, maintain existing run-off rates and provide additional wetland habitat; and the soft landscape scheme designed to include new habitats of ecological value within the green infrastructure.
		The planting of new native trees, shrubs, woodland and hedgerows along the eastern boundary will also serve to connect offsite habitats via new foraging and commuting routes for a range of wildlife. The establishment and long-term management of these habitats will offset the losses to development and seek to result in an overall net gain in habitat of biodiversity value. Furthermore, the proposed new planting will enhance the connectivity between Stoke Bushes LWS to the northeast and the woodland adjacent to the south of the Site through new tree, scrub, hedgerow and woodland habitats, thereby strengthening the integrity of the local ecological network.
		During the operational phase, with mitigation, the impact on the designated sites, habitats and vegetation, fauna, and species will be negligible.
		A Biodiversity Net Gain will be achieved and existing features of nature conservation within the Site will be retained and enhanced where possible.
9.	There will be a negative impact on highway safety and traffic. The proximity of the proposed development will negatively impact the existing traffic flow issues and delays at Baynards	With regards to the addendum Transport Assessment, this concludes that at the time that the technical work presented in the original Transport Assessment (TA) was undertaken, there was an expectation that the Baynards Green roundabout would become signalised under the terms of the Oxford Growth Fund. However, in the time that has elapsed since the application was submitted the monies identified for the Baynards Green roundabout upgrade has been reallocated elsewhere in the County.
	Green roundabout which already struggles with the volume of vehicles and has already seen an increase in	To this end, and in recognition of feedback provided by NH on the respective applications, a revised mitigation strategy has been developed in conjunction with NH and OCC. As with the Oxford Growth Fund scheme, this comprises the full signalisation of the roundabout and widening on the approaches and circulatory carriageway.

lorries and larger vehicles.
Junction 10 of the M40 will
negatively be impacted as traffic
already backs up in both
directions on the motorway
which is dangerous. The current
exit slip road is only one lane
and relatively short in length.

However, unlike the Growth Fund scheme, the design developed by the adjoining site Albion Land (AL) and TSL incorporates active mode infrastructure to ensure pedestrians and cyclists are able to navigate the junction.

The outcome of the traffic modelling that has been undertaken has shown that the above-mentioned mitigation scheme is able to satisfactorily accommodate traffic associated with schemes. Indeed, it is forecast to provide significant benefits when compared to the current situation, which is one where operational stress results in significant peak hour queuing, and that which was envisaged by the previous Oxford Growth Fund scheme.

The design has been agreed in principle with National Highways (NH) and OCC and the outcome of an independent (Stage 1) Road Safety Audit has indicated that there are no inherent safety issues associated with its design. There is thus a scheme at Baynards Green roundabout that mitigates the residual cumulative effects of the proposed developments in a safe and suitable manner.

In addition to the capacity tests undertaken at Baynards Green roundabout, it should be noted that the following junctions have also been assessed (as agreed with NH and OCC):

- M40 J10
- AL eastern and western site accesses
- TSL site access
- B4100/A4095

In terms of M40 J10, it has been established (through highways modelling) that when compared to the reference case (i.e. no development and the current Baynards Green roundabout being retained), the combined developments and junction improvement at Baynards Green will reduce delays and incidences of queuing across the M40 Junction 10 network. The efficacy of the works to address the proposed developments is therefore not externally constrained and no other works are required. Indeed, NH confirmed through the Baynards Green design evolution that there would not be any adverse effect on the slip roads at Junction 10 with queues not blocking back to the mainline of the M40.

For the site access the outcome of modelling all confirms that it is of a sufficient size to safely accommodate demands associated with the proposed developments in isolation and cumulatively. Indeed, it has been shown that the operation of these junctions will not experience any blocking back of queues to/from adjacent junctions (incl. the upgraded Baynards Green roundabout) to the detriment of the free flow of traffic.

Whilst the original TA for the site assessed the performance of the B4100/A4095 based on the current roundabout junction, it was recognised that this junction had been identified as being converted to a traffic signal scheme. In the time that has elapsed since the application was submitted, OCC has granted itself consent for a traffic signal scheme under the provision of County application 23/02852/OCC / R3.0094/21. This application was supported by a range of transport documents including a Transport Statement and VISSIM Forecast Technical Note prepared by Aecom that was informed by a model that tested traffic flows extracted from the BTM.

When considering the impacts of the proposals, the highways consultants has similarly referred to a VISSIM model developed having regard to the approved traffic signal design pursuant to County application ref. 23/02852/OCC / R3.0094/21 but using the BTM flows that have been used to inform the modelling of all other junctions. The outcome of this assessment has confirmed the approved traffic signal scheme, which is understood to be identified for construction this year, will experience only modest increases in delays as a result of the proposed developments in isolation and cumulatively. Accordingly, the effects of the TSL proposals (and cumulatively with the AL scheme) are not severe at this location.

On the basis of the modelling that has been undertaken in response to the comments received from NH and OCC on the application, it is clear that either on its own or with the cumulative effects of the two proposed developments, the proposals will not lead to a severe residual cumulative effect on either the strategic or local road networks. In this regard, the proposed developments do not exceed the assessment threshold outlined in NPPF paragraph 114 (d) and are thus entirely acceptable from a highway impact perspective.

The Transport Assessment Addendum for the application concludes:

- Appropriate opportunities to promote sustainable transport modes have been taken up, given
 the type of development and its location. In particular, the site will provide two new bus stops
 with contributions provided to an enhanced bus service, opportunities to provide a shared
 foot/cycleway link to Bicester have been explored, and, a trim trail will be provided at the TSL
 development for use by staff;
- Safe and suitable access to the site can be achieved for all users. This has been confirmed through the Stage 1 RSA of the proposed access arrangement which incorporates active travel facilities alongside being designed for all vehicles that are expected to require access to the site.

•	The design of streets, parking areas, other transport elements and the content of associated
	standards will reflect the guidance in place at the time of a reserved matters application. This
	will include parking provision for cars, electric vehicles, cycles and HGVs.

• The impacts of the development on the transport network in terms of capacity, congestion and highway safety have been addressed and mitigated, in particular through an improvement scheme at the Baynards Green roundabout.

Middleton Cheney

10. The environmental impact particularly to local agriculture and the noise and light pollution from increased traffic and deliveries and night time lights in the warehouses.

Agricultural land

The Agricultural Land Classification report accompanying the application states that the land comprises moderate quality (subgrade 3B) agricultural land. The Agricultural Land Classification report further explains that the majority of land within Oxfordshire and Cherwell is either Very Good (Grade 2) or Good to Moderate (grade 3) agricultural land. In Cherwell this accounts for 67% of land, which is significantly higher than the national average.

The Proposed Development will help address a substantial and growing need for new logistics floorspace at the national, regional (East Midlands and South East) and local (M40 corridor) level. The accompanying Logistics Market Assessment and Land Availability Report explains that there are no other suitable sites that could accommodate the Proposed Development, and there are very few sites nationally which benefit from such good links to the strategic highway network (which is a fundamental requirement of logistics operators). Accordingly, the loss of agricultural land is necessary in this instance.

The Proposed Development will result in the loss of moderate quality (subgrade 3B) agricultural land, which is widespread within Cherwell and Oxfordshire as a whole. No best and most versatile agricultural land will be lost. As the sub-grade 3B land represents some of the poorest quality land available within the District, the Proposed Development will not significantly harm national agricultural interests and is broadly consistent with the NPPF.

Noise

The noise chapter in the accompanying the Addendum Environmental Statement assessed the potential noise generating activities of the proposal, including noise associated with traffic. It concluded that the proposal is

		expected to have a low impact on sensitive receptors and will preserve the existing amenity of neighbouring occupiers.
		Light
		Lighting details accompany the planning application. Operational lighting is required throughout the development to provide minimum levels of lighting to complete activities safely, prevent crime and aid navigation through the Site. The lighting scheme will be designed with regard to the minimum lighting levels provided in the following documents:
		 CIBSE Lighting Guide LG6 – The Outdoor Environment;
		 Association of Chief Police Officers (ACPO) guidance for safety and security, and
		BS EN 12464-2:2014 Light and Lighting – Lighting of Work Places Part 2.
		Lighting will be sensitively designed and located so to minimise light spill within and outside the Site. The External Lighting Layout and Illuminance Plot is shown on drawing 20962/E/1001 Rev P1. The illuminance plot demonstrates that there will be no light spill on the closest sensitive receptors.
11.	The local roads are already at	Please see the response in 9. above.
	saturation point if there is an	
	incident on the M40. This	
	development will inevitably	
	increase traffic on ALL	
	neighbouring roads as lorries	
	move in and out of the site.	
	Although this site does not directly join our parish, we	
	consider that the inevitable	
	increase in traffic particularly	
	along the A43 and the A422 will	
	have a detrimental effect on the	
	environment around us.	
12.	The design, appearance and	Heritage
	layout of the site is unsuitable	

	for this position and the character of the land. Cherwell's local development plan references, respect for heritage assets Conservation of tranquillity and biodiversity and	The updated Archaeological and Heritage Assessment has considered the impact of the Proposed Development on designated and non-designated Heritage Assets within a 2km radius from the boundary of the Site. The assessment concludes that the Site does not contain any designated Heritage Assets, such as World Heritage Sites, Scheduled Monuments, Listed Buildings, Registered Parks and Gardens, registered Battlefields or Conservation Areas.
	environmental character. These plans pay no regard to these statements.	Heritage Assets within a 2km radius of the Site have been assessed in order to understand whether the Site forms part of their settings such that it contributes to their significance. It was determined that the Site is part of the setting of a single Heritage Asset (the Grade II* listed building Church of St Peter) but that it makes no contribution to the church's significance or to that of any other Heritage Asset.
		The Heritage Assessment established that the Site contains no designated Heritage Assets and that it does not contribute to the heritage interest of any designated Heritage Assets or non-designated Heritage Assets in the wider landscape as part of their settings. It is concluded that the Proposed Development would not result in any adverse effects to any designated or non-designated Heritage Assets in the wider landscape.
		The HER (archaeological) records a possible Iron Age 'banjo enclosure', as well as a possible Iron Age ring ditch within the Site. Archaeological remains within the Site related to Iron Age settlement activity would be of moderate archaeological interest but are unlikely to be of such high heritage value as to warrant preservation 'in situ' and their loss could be adequately mitigated through archaeological excavation. Well-preserved remains related to a Bronze Age ring ditch or barrow could be of greater significance, however, the evidence suggests that these are not present within the Site and, regardless, an isolated and denuded barrow would be unlikely to warrant preservation 'in situ' and, if demonstrated to exist, its loss could also be adequately mitigated through archaeological excavation.
		Ecology
12		Please see the response in 8. above.
13.	Cherwell DC has declared a climate emergency, it is difficult to reconcile these plans with that!	A Sustainability statement is submitted as part of the application submission. This demonstrates how the proposed design of the development will address and exceed national and local planning policies, guidance and regulations and the low carbon agenda.

To mitigate for the anticipated operational energy related emissions, the Proposed Development will use the 'energy hierarchy' to reduce carbon emissions. The operational energy usage will be reduced using passive measures included within the design of the development. These will reduce energy use and the associated CO2 emissions and include: U values which exceed Building Regulation requirements; engineered facade design; and reduced air permeability.

The next level in the energy hierarchy is to maximise energy efficiency. High efficiency systems, plant, controls and equipment will be incorporated into the development such as: energy efficient LED lighting; enhanced lighting controls - automatic presence detection will be included in appropriate areas of the building. This form of control will ensure lights are automatically switched off during periods of non-occupancy; optimised plant controls; variable speed drives - variable speed drives will be installed on circulation pumps and ventilation fans to allow the speed of the respective motors to be amended by the automatic controls to suit changing load of the building; and inclusion of heat recovery on ventilation systems.

All buildings will meet at least BREEAM 'Very Good' standards.

The Proposed Development will be of a high quality and sustainable construction. Tritax Symmetry has made a commitment that all their new commercial buildings will be built to 'Net Zero Carbon in Construction'.

The final level in the energy hierarchy is to incorporate renewables / low carbon technology. It is anticipated that the PVs and air source heat pumps will be incorporated.

The whole of the useable roof area is constructed to accept PV panels; however, the final percentage of roof coverage of PVs will depend on the final operator's energy usage. The initial base build PV coverage is generally sufficient to power the building. Occupiers can then add further PV panels to meet their specific needs. This helps to avoid manufacture of redundant units and allows the most efficient units available to be used when required. The building design utilises a steel frame structure with light weight walls and roof cladding. This minimises the load bearing capacity of the structure, particularly relating to the roof. Thereafter the roof structure of the unit has been designed to take further PVs in the future.

The submitted Framework Travel Plan contains details of the measures incorporated to reduce the impact of transport associated with the development. This will assist in reducing carbon emissions associated with operational transport. These measures include: on site covered cycle parking; shared pedestrian/cycle routes; 25% of spaces to be electric vehicle recharging facilities; and a shift-based bus service.

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		In summary, the sustainability credential of the proposed scheme can be summarised as follows: Net Zero Carbon in Construction; • At least 18% available roof coverage PV installation plus infrastructure for 100%; • 25% Electric Vehicle Charging for car parking provided with infrastructure for 100% provision; • 25% improvement on potable water usage; • Improvements to public transport provision, local cycling and pedestrian network; • On site cycle storage facilities; • Minimum BREEAM Very Good certificate; and • Biodiversity Net Gain.
Goding	rton	
14.	Contrary to the Cherwell Local Plan which does not support such development in rural areas.	Please see the response in 4. above.
15.	Will hugely increase traffic on already busy local roads, many of which are small in nature. Inaccessible to public transport.	Please see the response in 9. above.
16.	Uses agricultural land in greenfield sites when we should be maximising our ability to be sustainable.	Please see the response in 10. above.
17.	Will be visually harmful to local communities as set in a flat landscape.	Please see the response in 2. above.
18.	Significant disruption caused by it's construction - at a time when local roads and residents already hugely affected by EWR and HS2 construction traffic.	There is potential for construction activities to cause nuisance. This potential impact can be mitigated by the implementation of a Construction Management Plan (CMP). A Framework CMP has been submitted as part of the planning application

Fritwell Parish Council

Market Analysis "We conclude 19. that without allowing Symmetry Park, Ardley to come forward there is not enough allocated land available and likely to come forward to meet anticipated demand over the next 10 years. If Symmetry Park, Ardley is permitted then the gap between supply and estimated demand is reduced substantially but still leaves insufficient capacity to meet estimated demand". FPC understands this is the case nationally, but in our opinion, this does not present a strategic case for this specific area.

The need for the development is demonstrated by the reports prepared by Savills in support of the planning applications, which confirm that there is an increasing need for logistics and warehouse floorspace nationally, and along the M40 corridor specifically.

Research by Savills for the UK Warehousing Association (UKWA) 'The Size and Make-up of the UK Warehousing Sector' (2021) states that:

The number of logistics and warehouse units has risen by 32% since it was last reported six years ago;

The trend toward bigger units is propelling this rise with demand for units of 92,903 sq.m, an increase of 242%;

Third party logistic companies are now the leading occupiers while online retailers have increased occupancy by 614%, For every £1billion spent online another 7,199 sq.m of warehouse space is needed to meet demand.

A Market Analysis Report was prepared by Savills to support the outline planning application. This has been updated, to reflect the current market, as it was produced two years ago. No specific response/comments were received to the originally submitted report. The Savills report confirms that the current adopted Cherwell Local Plan 2011-2031 (Part 1) only partially accounts for the latest economic trends leading to higher demand for employment land in the logistics sector. The latest available evidence base from the Council is the Cherwell District Council's Economic Needs Assessment (ENA) (2021) and the Employment Land Review (2022) both prepared by Lambert Smith Hampton. The ENA estimates future need for employment land and finds that there is a need to create up to 47% more employment land for transport and storage than at present by 2040.

The Executive Summary of the Savills report concludes:

'In the light of our new work our overall conclusion remains the same as our previous market analysis in April 2022. There is a strong market needs case for permitting the Symmetry Park, Ardley scheme now, as well as the nearby Albion Land scheme. This location provides an exceptional opportunity to take account of the opportunity afforded by the M40 corridor to deliver a strategic logistics hub in the Cherwell District. The schemes are capable of accommodating units of a scale that cannot be met elsewhere in the District on allocated and review sites.

We estimate that in the wider property market area (PMA), which includes a number of neighbouring authorities to Cherwell, with these schemes coming forward supply of and demand for large logistics sites would broadly be in balance. We consider it appropriate to assess demand and supply at the wider PMA level as this is how the market views the area, and occupiers can choose to locate anywhere suitable in this area, independent of local authority boundaries.

In reality, large parts of the wider PMA are unsuitable for strategic logistics development, either being too distant from the Strategic Road Network, or subject to constraints and designations such as Green Belt and AONB. Given Cherwell's position and the attractive characteristics of these sites, the opportunity to capture the wider demand and the associated socio-economic benefits, business rates and job creation could be expressed in part in Cherwell including on these sites.

Our approach takes in to account our research which has found that allocated development sites typically take longer to deliver than timescales projected in local plans. We have assumed that 75% of the capacity of our assessed supply of allocations, permissions and the two schemes would come forward over a 10 year period. This is a conservative assumption given the actual outcomes in the case studies we have reviewed, and emphasises the importance of offering the market a choice of sites and flexibility to meet the needs of business (i.e. freehold and leasehold opportunities). Having a readily available land supply allows occupiers to make investment decisions with confidence (e.g. Siemens Healthineers example at J9 M40 taking unallocated land due to lack of allocated options).

Additionally, occupiers are also upgrading their stock in order to ensure they occupy energy efficient, net zero carbon buildings. Land supply should factor in these new requirements to help meet the UK's net zero goals.

Our appraisal is over a 10 year period and so is shorter than Cherwell's emerging local plan timeframe. We have focused on the short to medium term as this is where the most urgent need is for new development to meet the currently identified market need in a range of site options. Over the full timeframe of the emerging local plan there is likely to be the need to allocate further land for logistics to ensure market needs can be met, and for supply and demand to remain in balance.

Our average per annum core estimate of 630,000 sq.ft (15 ha) annual demand compares to figures estimated by LSH for Cherwell DC in their 2022 ELR of 420,000 sq.ft (9.8 ha).

We conclude that without allowing both Symmetry Park Ardley and Albion Land M40 J10 to come forward, there is not enough allocated land available and likely to come forward to meet anticipated demand over the next 10 years. If Symmetry Park, Ardley is permitted then the gap between supply and estimated demand is reduced substantially but still leaves insufficient capacity to meet estimated demand.

Below we elaborate on the steps in our analysis, and more detail is given in the main report.

Supply vs Demand (Page 7)

We find that with the inclusion of the sites Symmetry Park, Ardley and Albion Land M40 J10 there is sufficient supply to meet estimated demand. This is in line with our findings provided in 2022.approx. Table E1 and Figure E1 set out how supply and demand compare in the Wider PMA.

In the Local PMA, only including Symmetry Park, Ardley would result in a smaller shortfall of approx. 0.9m sq.ft (21 ha) and including Albion Land M40 J10 would result in a modest supply surplus of approx. 1.4m sq.ft (29 ha) in the short term.

We conclude that without allowing both Symmetry Park, Ardley and Albion Land M40 J10 to come forward, there is not enough allocated land available and likely to come forward to meet anticipated demand over the next 10 years. If Symmetry Park, Ardley is permitted then the gap between supply and estimated demand is reduced substantially but still leaves insufficient capacity to meet estimated demand.'

The key criteria for a successful logistics site are motorway proximity, junction access, connectivity to road, rail, air and sea as well as the size of the site and the potential quantum of accommodation. The Proposed Development will be located on the border of the South East and East Midlands regions. These regions are traditionally regarded as the two 'powerhouses' of the UK logistics market but demand significantly outweighs supply.

The industrial and logistics sector will be instrumental in the economic recovery of the UK. Logistics is an important part of Cherwell's economy as a business sector in its own right and as an enabler to the success of

		other businesses of all sizes and sectors. This aspect of recovery will not be possible without suitable strategic employment sites, such as the Application Site, to accommodate the necessary growth. Junction 10 of the M40 Motorway is in close proximity to the Site, importantly this junction also provides north and south bound vehicle access and is broadly equidistant from Birmingham and London, two key population and commercial centres in the UK. The proposals will address a significant need for logistics floorspace along the M40 motorway corridor. The Site benefits from fast road transport links to London, Birmingham and the M25 and is ideally placed to meet this growing need. Without the Application Site, the supply imbalance will worsen and contribute to the already high levels of unsatisfied need in Cherwell and the wider region. This unsatisfied need has been exacerbated by the Covid-19 pandemic and evolving consumer trends, and will continue given the limited development pipeline', which is not sufficient to satisfy the demand. Whilst the pandemic has certainly accelerated demand for more online shopping, there are many other longer-term factors driving a race for logistics floorspace from the growth of high-tech manufacturing to supply chain changes coming from our new trading relationships with the EU and the world. The Proposed Development will help address the
		need for high-quality logistics floorspace. Rapid changes are occurring to occupier requirements, in particular a trend towards larger footprint buildings which offer economies of scale and a shift for precautionary logistics in reaction to potential disruption of supply chains.
20.	There is a suitable sized and qualified workforce within the labour market area" but also states elsewhere that "The proposed development is likely	A Labour Market Analysis has been submitted as part of the planning application. This concludes there is a suitably sized and qualified workforce within the labour market area. This area has a large, suitably skilled and qualified potential workforce that is growing faster than the wider region and the UK. The area also has a notable specialisation in logistics.
	to draw its workforce from beyond the Oxfordshire boundary" Fritwell is the largest community closest to this proposed development. FPC, with support from others in the community see only detrimental	The development would generate 2,430 jobs to 2,990 (on and off site – operational), and the development is expected to contribute some £148 million per year gross value added (GVA). Over the past decade the nature of employment within the logistics sector has changed considerably, with a significant increase in both the quantum and quality of jobs created. Research by Prologis in 2019 (Technical Insight from Prologis UK (September 2019) Distribution Warehouses Deliver More Jobs) identified that on average, its customers employed one person for every 95 sq.m of floor space. It also showed the nature of the employment to be:

	effects to our village, a rural community established even before the Roman conquest of Britain with a rich heritage. The jobs offered will likely be largely low skilled and with the number of warehouses already springing up from Bicester to Banbury we are quite sure that thousands of newcomers to the area will be needed, with low, to no employment benefits coming to Fritwell, a community of less than 740 with no employment issues.	 People who work on warehouse floor 49% HGV drivers 8% Office 25% Managerial role 12% Other 6% (Predominantly made up of IT, customer service, sales and engineers). Modern logistics warehouses now employ a wide- and far-reaching cross section of employees with IT and engineers being a major part of the employee base. Forecasters believe employee make up will continue to grow towards larger numbers of support, IT and engineers as online retailing increases and logistics solutions evolve to meet the demands of the customer base, for example next day delivery.
21.	This is within Flood Zone 1(the lowest risk of flooding)". That may be the case as agricultural land, but again FPC note the use of the "SUDS Strategy" with swales, basins etc. to offset rafts of concrete as part of the development. We remain unconvinced, particularly in respect of long-term maintenance.	A Flood Risk Assessment (FRA) accompanies the submission of the planning application. The flood resilient design of the Site's drainage, through the implementation of a Sustainable Urban Drainage Strategy (SuDS) will ensure that the Proposed Development can come forward without increasing the risk of flooding, either on the Site, or to the surrounding area. The Proposed Development will have no impact on the movement of floodwater across the Site; there will be no increase in the floodwater levels due to the Proposed Development. The Proposed Development creates the opportunity to improve the surface water drainage and risk of flooding within the locality. Through the implementation of SuDS, the exposure of people and property to flood risk will be reduced and minimised compared to existing Site conditions. The Environment Agency had no objections to the Flood Risk Assessment submitted as part of the planning application. The Proposed Development will have no impact on the movement of floodwater across the Site; there will be no increase in the floodwater levels due to the Proposed Development. The Proposed Development creates the opportunity to improve the surface water drainage and risk of flooding within the locality. Through the

		implementation of SuDS, the exposure of people and property to flood risk will be reduced and minimised
		compared to existing Site conditions.
		A Schedule of Maintenance is submitted as part of the Flood Risk Assessment submitted for the Site and a condition can be attached to the planning permission for the proposal to secure this maintenance.
22.	Disregards local planning norms as this is not a designated site for development.	Please see the response in 4. above.
23.	Irreparably harms the character and visual appearance of the	Please see the response in 2. above.
	area.	With regards to the proposal being of an appropriate scale and respect the character of villages and the surroundings, the Proposed Development is not within a village or rural settlement. The Parameter Plans identify 'Build Zones' as well as substantial areas of soft landscaping and bunds. A masterplan approach has been adopted to ensure that development is of a high-quality design and sensitive to its surrounding landscape.
		Th village in closest proximity of the Site is Stoke Lyne. The Heritage Assessment and Landscape and Visual Impact Assessment considers the impact the Proposed Development will have on the setting of Stoke Lyne. These assessments form a robust basis on which to assess how the Proposed Development will impact the character of this village.
		Stoke Lyne is located approximately 1 mile to the east of the Site. In assessing the impact of the Proposed Development, the Landscape Visual Impact Assessment concludes that at year 15, proposed landscape measures within the Application Site, including tree planting, landscaped bunds and a range of proposed new habitat types, would have matured, assimilating the Proposed Development into the wider landscape context.
		The Proposed Development is situated next to the A43 and the B4100 and is not within a village or rural settlement. The Proposed Development will not have any adverse impact on the character of any village. The submitted parameters plan identifies areas of soft landscaping including a large landscaping buffer to the east of the Site. The development is sensitive to its surrounding landscape. A detailed landscaping scheme will be submitted as part of subsequent reserved matters Applications and will be required to comply with the approved Parameter Plan. It is submitted that the individual identity and character of Stoke Lyne will be retained, there will be no significant adverse impact on the character of a village or surrounding environment.

		The Addendum Environmental Statement and the associated Addendum Transport Assessment demonstrate that
		the Proposed Development can be carried out without undue detriment to the highway network.
24.	Will lead to an urbanisation of the area, as the catchment area will not support the employment needs of this facility (despite the analysis report suggesting otherwise). These employees will come from elsewhere in the country and this influx of people will have to live somewhere. The Bicester to Banbury corridor is exhausted by the pressures of already planned and now,	Please see the response in 20. above.
25.	speculative developments. Will be a "speculative development" referencing the "need for warehouse space" does not accommodate a strategic plan for where it should be located to accommodate minimum traffic movements to serve the real needs of the country, FPC see nowhere in this application a reference to this as a strategic location other than it is located along a major road system. Thousands of square feet of warehouse space already developed along the M40 corridor remains unused.	Please see the response in 19. above.

26.	States in the Statement of Community Involvement a local consultation has been concluded. Villages, and estates (Tusmore Park) that will be affected by this development, have been excluded from the consultation, in FPC opinion, rendering this exercise unproductive.	In light of the COVID-19 pandemic, the Applicant considered the most appropriate manner in which to engage with the local community, the public engagement strategy therefore included a virtual exhibition. The consultation material was uploaded onto Frampton Town Planning's website to allow online access for the community. Invitations were sent to members of the Parish Councils below, for a virtual presentation: • Stoke Lyne Parish Council • Ardley and Fewcott Parish Council The following local Ward Councillors (Fringford and Heyfords Ward) were also sent invitations for a virtual presentation. No responses were received from the Parish Council or Ward Councillors. A Statement of Community Involvement was submitted as part of the planning Application.
27.	Biodiversity impact Reference Biodiversity Impact Assessment document (edp2355_r016a) concludes that although "despite the relatively low ecological value of the arable fields and margins" and these "areas of low distinctiveness habitat are none-the-less extensive and therefore cumulatively add up to a significant loss, which is compounded by replacement across much of this area with buildings and hardstanding which is of negligible ecological value, or amenity grassland which is of low value". FPC supports this view that this development will irrevocably	Please see the response in 8. above.

	damage the rural nature of this	
	area and the species it supports.	
28.	Traffic and Congestion	Please see the response in 9. above.
	Albeit a traffic survey has been	
	completed and takes account of	
	the Albion Land proposal as	
	well, it fails to accommodate	
	the larger impact of the OXSRFi	
	project which will be	
	determined at national rather	
	than local planning level which	
	in FPC opinion renders this	
	analysis redundant. It was	
	however noted "that the	
	Strategic Rail Freight facility is at	
	a relatively early stage of the	
	planning process and as such	
	there is not anything in the	
	public domain that outlines the	
	likely traffic implications of this	
	emerging scheme". This does	
	not obviate the necessity to at	
	least estimate the impact – the	
	recent public "roadshow"	
	suggested up to 20,000	
	additional daily (to and from)	
	freight traffic movements (not	
	including staff movements). The	
	M40 Junction 10 / A43 /	
	Baynards Green junctions is a	
	known. There are already issues	
	at Junction 9 of the M40 - "Firm	
	admits M40 works at J9 for	

Bicester made traffic worse" Source: Oxford Mail, 8th April 2019, and at Junction 10 as previously mentioned, often during peak times, negotiating the Baynards Green roundabout can take upwards of 15-20 minutes. Citing "Traffic Congestion to Cost the UK Economy More Than £300 Billion Over the Next 16 Years" Source: Study from INRIX and the Centre for Economics and **Business Research Predicts** Annual Cost of Congestion in the UK will Rise 63 Percent by 2030 to £21 Billion. LONDON, UK – 14th October 2014. Building such large structures at this junction will only exacerbate already intractable problems and increase traffic pollution in this area, an area that is essentially rural in nature. While this development is close to a motorway junction, there is no public transport to this site. accident/traffic snarlup hotspot (source: SABRE), this development can only increase the problems at this junction. The M40/A34/A43 road system "arc" is a well know area for

	congestion, increasing travel	
	times and resultant pollution,	
	given the massive increase in	
	Bicester of housing and	
	population, the Great Wolf	
	resort planning refusal	
	overturned, this project will	
	only exacerbate an already	
	untenable traffic problem in this	
	vicinity.	
29.	Conversion of Agricultural Land	Please see the response in 10. above.
	to Industrial use FPC opines that	
	far too much local green field	
	land has been absorbed in	
	development recently and to	
	remove land from agricultural	
	use when there are many	
	brownfield sites (per CPRE in	
	2020, 21,000 sites at around	
	25,000 Hectares) available for	
	development, why not on these	
	sites obviating the need to	
	develop new infrastructure, as	
	would be needed here. FPC opts	
	for the "Do Nothing" scenario	
	preserving the land for	
	agricultural use, this is what	
	farmland is for!	
30.	Pollution Noise, light, and Air	Noise
	pollution	
	Pollution Noise, light, and Air	The noise chapter in the accompanying the Addendum Environmental Statement assessed the potential noise
	pollution are of significant	generating activities of the proposal, including noise associated with traffic. It concluded that the proposal is
	concern during the construction	

and operation of these warehouses, particularly the cumulative effect that would surround the village of Fritwell with the Heyford development to the Southwest, the potential for the Rail Freight Terminal in the South and this development with Albion Land and this development to the East. Fritwell Parish are deeply concerned about noise attenuation resulting from this facility operating 24/7. Fritwell is Class 3/Class 4 on the Bortle Scale for Night Sky Brightness, this would be compromised by additional light pollution from this planned facility. We enjoy good air quality in Fritwell despite the proximity of the motorway, this will be compromised by this development.

expected to have a low impact on sensitive receptors and will preserve the existing amenity of neighbouring occupiers.

Lighting

Lighting details accompany the planning application. Operational lighting is required throughout the development to provide minimum levels of lighting to complete activities safely, prevent crime and aid navigation through the Site. The lighting scheme will be designed with regard to the minimum lighting levels provided in the following documents:

- CIBSE Lighting Guide LG6 The Outdoor Environment;
- Association of Chief Police Officers (ACPO) guidance for safety and security, and
- BS EN 12464-2:2014 Light and Lighting Lighting of Work Places Part 2.

Lighting will be sensitively designed and located so to minimise light spill within and outside the Site. The External Lighting Layout and Illuminance Plot is shown on drawing 20962/E/1001 Rev P1. The illuminance plot demonstrates that there will be no light spill on the closest sensitive receptors.

Air Quality

An Air Quality Assessment (AQA) accompanies the planning application. The AQA assesses potential air quality impacts during both the operational and construction phases of the development.

The potential for construction activities to cause nuisance from dust is considered to have a low/negligible adverse impact. This potential adverse impact can be mitigated by the implementation of a Construction Management Plan (CMP). A Framework CMP is submitted as part of this planning application.

The AQA submitted alongside this Application assesses the impact of the Proposed Development on air quality. It found in the absence of mitigation the Site is found to have a 'Low Risk' in relation to dust soiling effects on people and property, human health and ecological impacts. Providing mitigation measures are implemented as outlined in the AQA residual effects from dust emissions arising from the construction phase are considered to be 'not significant'.

		The AQA has also considered the operational effects of the Proposed Development and found the effects to be 'not significant'.
		The nearest residential properties comprise one dwelling located to the east of the Site. No other residential properties are located within close proximity of either Site. The Parameters Plan requires the provision for a bund along the eastern boundary. The final noise attenuation measures will be defined at reserved matters stage and will ensure that impact on residential amenity is mitigated.
31	Flooding	Please see the response in 21. above.
	This may well have been	
	identified this area as Flood	
	Zone 1, but local experience in	
	Fritwell indicates that	
	1. This area has a very high-	
	water table with groundworks	
	finding water during dry	
	seasons about 60cms below the	
	ground in some areas, and;	
	2. Fritwell experiences annual	
	flooding, varying in severity,	
	with 2020 being a particularly	
	bad year with several properties	
	being inundated,	
	3. Maintenance of an	
	increasingly ageing drainage	
	system is minimal, with the	
	council this year unable to clear	
	gully's because of "budget	
	issues", we are very cynical that	
	this would be sustained over	
	the years of operation.	
	We know that water runoff from	
	a large built area such as this	
	will increase substantially	

	(despite "SUDS"), and even	
	though swales and infiltration	
	basins are suggested, these may	
	work for a while but when	
	"budgets" for maintenance	
	prevent this from happening to	
	retain the efficiency of these	
	measures, we are quite certain	
	that with nowhere else to go,	
	the local villages will suffer.	
	Fritwell Parish Council (June	
	2022).	
Mid Che	erwell Neighbourhood Plan	
32.	The site of application	No comments, and the recognition that the site is outside of the designated Neighbourhood Plan area is noted.
	22/01340/OUT is immediately	
	adjacent to the designated NDP	
	area, and we consider that the	
	impact of the application will	
	significantly affect communities	
	within the MCNP area. NDP	
	policies on employment, traffic,	
	views and vistas, and light	
	pollution are all relevant	
	because the impact of adjacent	
	development can in each case	
	be transmitted across parish	
	boundaries. Our reasons for	
	objecting are therefore as	
	follows.	
33.	MCNP Policy PC1: Local	Please see the response in 19. above.
	Employment deals with the	
	conditions under which	Furthermore, as the Site is not in the MCNP area there is not a requirement to comply with its policies.
	establishment of new small	

businesses would be supported. This wording was deliberately chosen to exclude support for large-scale business development, such as that proposed in these applications. However, it is useful to consider the criteria that MCNP Policy PC1 requires to be fulfilled for support of small business development, namely: a) provide diverse employment opportunities for people living in the neighbourhood area or otherwise benefit the local economy, or enhance agricultural production. b) do not have an adverse effect on the surrounding built, natural or historic environment that is not clearly outweighed by the economic benefits of the development. c) are unlikely to generate a volume of goods traffic that would have a significantly harmful effect on road safety or congestion or cause unacceptable noise and disturbance for local residents or to the rural environment and would not adversely affect onstreet residential parking. Commentary: It is not clear

	from information provided by
	from information provided by
	the applicants that the
	employment opportunities
	created by the development will
	be of a diverse nature, or that
ı	they will be opportunities for
	people living in the NP area. The
	loss of agricultural land will do
	the opposite of enhancing
	agricultural production. The
	scale of the proposed
	warehousing development will
	certainly have an adverse effect
ı	on the surrounding
	environment. It is also evident,
	although insufficient detail has
	been provided, that the volume
	of goods traffic will have a
	harmful effect and cause noise
	and disturbance to the residents
	and the environment.
	Therefore, even if this proposal
	were a small-scale business, it
	would not have met the criteria
	for support by policy PC1. It
	follows that the intent of the
	policy certainly does not allow
	for support to a large-scale
	development adjacent to the
	NDP area that equally does not
	meet the criteria.
34.	MCNP Policy PD4: Protection of
	Important Views and Vistas. This

	malla, states (atomalia 40 c)	For the survey of the City is not in the NACNID and the unit not a manifest of the country of th
	policy states, inter alia, that:	Furthermore, as the Site is not in the MCNP area there is not a requirement to comply with its policies.
	"The development should not	
	harm the Conservation Area and	
	its setting, other heritage assets,	
	or historic street and village	
	views and longer distance	
	vistas." Commentary: there are	
	two Conservation Areas within	
	the MCNP designated area that	
	are close to the application sites	
	 namely Fritwell, and Ardley 	
	with Fewcott. The applicants	
	should be required by CDC to	
	carry out detailed analysis of	
	views and vistas in order to	
	ascertain the extent of visibility	
	affecting these Conservation	
	Areas. Only then is it possible to	
	determine whether the	
	requirements of Policy PD4 can	
	be met.	
35.	MCNP Policy PD6: Control of	Lighting details accompany the planning application. Operational lighting is required throughout the development
	Light Pollution. There is serious	to provide minimum levels of lighting to complete activities safely, prevent crime and aid navigation through the
	concern that the scale and	Site. The lighting scheme will be designed with regard to the minimum lighting levels provided in the following
	height of the proposed	documents:
	development will make it	
	unable to meet the criteria - in	CIBSE Lighting Guide LG6 – The Outdoor Environment;
	particular c) and e) - of this	 Association of Chief Police Officers (ACPO) guidance for safety and security, and
	policy: c) proposals should not	BS EN 12464-2:2014 Light and Lighting – Lighting of Work Places Part 2.
	have a significant adverse	b3 Liv 12404-2.2014 Light and Lighting – Lighting of Work Flaces Fait 2.
	impact on the character of a	Lighting will be consitively designed and located so to minimize light spill within and systems the Cite. The Citerral
	village and its setting or of the	Lighting will be sensitively designed and located so to minimise light spill within and outside the Site. The External
	wider countryside; e) particular	Lighting Layout and Illuminance Plot is shown on drawing 20962/E/1001 Rev P1. The illuminance plot
	, , , , , , , , , , , , , , , , , , , ,	demonstrates that there will be no light spill on the closest sensitive receptors.

	care should be taken to avoid	
	light pollution where the	Furthermore, as the Site is not in the MCNP area there is not a requirement to comply with its policies.
	development is in a remote	
	rural location, or where it might	
	adversely affect the setting of	
	the Oxford Canal.	
36.	Prematurity. We consider that	Please see the response in 6. above.
	unless and until these sites are	
	identified in the forthcoming	
	Cherwell Local Plan 2040, as	
	suitable for large-scale	
	commercial development, these	
	applications are premature.	
	They are of a highly strategic	
	nature, and - taken together	
	with other nearby and large-	
	scale development proposals	
	such as the Ardley SRFI,	
	Baynards Green Albion Land	
	sites, and the Great Wolf leisure	
	development at Chesterton –	
	must be considered as part of	
	an overall strategy for logistics	
	and transportation in the	
	County of Oxfordshire and	
	regionally, and as such should	
	be addressed in the	
	forthcoming Oxfordshire Plan	
	2050. Without this important	
	overview, any decision about	
	these applications is premature.	
	We strongly disagree with the	
	Applicants' view that their	

	application cannot wait until the	
	application cannot wait until the	
	Local Plan and Oxfordshire Plans	
	have been prepared.	
37.	Unproven demand. We consider	Please see the response in 19. above.
	that no convincing case has	
	been made for demand for	
	warehousing of this scale in this	
	location. The development is	
	entirely speculative, and as such	
	cannot outweigh the very	
	considerable harm that is likely	
	to be caused to the local	
	environment for the reasons set	
	out above.	
Farthing	ghoe Parish Council	
38.	Farthinghoe Parish Council	Please see the response in 9. above.
	would like to receive early	
	reassurances that full account is	
	taken of the negative affects of	
	extra traffic generated by this	
	proposal when the M40 is	
	closed by accidents or by road	
	repairs and the traffic is forced	
	to use the official signposted	
	A43/A422 diversion both to and	
	from Junction 11 M40.	