



SUPPORTING PLANNING STATEMENT Land north of Camp Road, Heyford ParkMARCH 2022





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1. INTRODUCTION

- 1.1 This Planning Statement has been prepared on behalf of Richborough Estates Limited and Lone Star Land Ltd (hereafter referred to as "the Applicant") and is submitted in support of an application for outline planning permission for residential development on land to the north of Camp Road, Heyford Park (hereafter referred to as the "Site"). All matters are reserved save for means of access.
- 1.2 The description of development is as follows:
 - "Outline planning application for the erection of up to 230 dwellings, creation of new vehicular access from Camp Road and all associated works"
- 1.3 This Planning Statement sets out the context for the development by providing a description of the site and its surroundings, details of the proposed development, and a review of the relevant planning history and policy framework. It also assesses the proposals against the identified policy framework and presents a clear case for the granting of planning permission.

The Application

1.4 The application is accompanied by a full suite of technical supporting documentation and illustrative scheme drawings, as listed at Appendix 1.

Structure

- 1.5 This remainder of this Planning Statement is structured as follows:
 - Chapter 2 considers the Site and surrounding areas
 - Chapter 3 examines the relevant planning history (including a Statement of Community Engagement)
 - Chapter 4 describes the proposed development.
 - Chapter 5 discusses the relevant planning policy context
 - Chapter 6 comprises the Planning Appraisal
 - Chapter 7 provides an Affordable Housing Statement
 - Chapter 8 provides an Economic Benefits Statement
 - Chapter 9 provides draft Heads of Terms relating to a S106 Legal Agreement
 - Chapter 10 concludes this Statement.





2. SITE AND SURROUNDINGS

Site Location

2.1 The Site comprises approximately 11.68ha (28.9 acres) of land on the eastern edge of Heyford Park (See Figure 2.1). It is located to the north of Camp Road and to the west of Chilgrove Drive. The site is approximately 7km north west of Bicester, 15.6km south of Banbury and 3.1km south west of junction 10 of the M40.

Figure 2.1: Location Plan (Site outlined in red) (extract of the Design and Access Statement)



- The Site is in the Upper Heyford Parish, on the boundary with Middleton Stoney Parish to the east and is centrally located within the wider Mid-Cherwell Neighbourhood Plan area.
- 2.3 The Site occupies the area of land adjoining the settlement boundary to the south east of the former RAF Upper Heyford base which is allocated for the development of a new settlement (Local Plan Part 1 Policy Villages 5). The allocation covers an area of 520ha and will deliver a mix of uses including 2,361 dwellings and approximately 120,000 sqm of employment floor space.

Application Site

- 2.4 The accompanying Design and Access Statement provides a detailed description of the Site and confirms that 5.9ha is considered suitable for development, based on the technical work prepared for the submission of the application. The topography dips westwards, towards the watercourse within the site.
- 2.5 The site is irregularly shaped and is comprises two separate fields divided by a hedgerow combined with a metal wire and post fence. The boundary features along Camp Road and Chilgrove Drive are a mix of hedgerows and trees. A watercourse is present onsite known as Leys

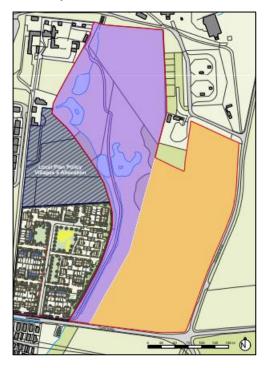




Farm Ditch, running from north to south in the western section of the site. In the north-western section there are also a series of small ponds artificially created at the beginning of this century.

- 2.6 There are no designated public rights of way that run through the Site and it is not currently accessible.
- 2.7 The Site as described in the Design and Access Statement is under the control of two land promoters (see Figure 2.2). The orange area (5.78ha) is controlled by Richborough Estates Ltd and the purple area (5.91ha) is controlled by Lone Star Land Ltd.

Figure 2.2: Applicant control of land (extract of the Design and Access Statement)



Historic Designations

- 2.8 The site is not subject to any heritage designations.
- 2.9 The Site is within 1 km of four Listed Buildings (all at Grade II), the RAF Upper Heyford Conservation Area and Scheduled Monument Cold War structures at the former Upper Heyford airbase.

Public Rights of Way (PRoWs)

2.10 There are no designated footpaths that run through the Site and there is not an extensive PRoW network in its context. A bridleway (ref: 422/3/10) extends south from the adjacent side of Camp Road and there is a network of bridleways further east of the Site.

Tree Protection Orders

2.11 No trees on-site are subject to a Tree Preservation Order. No ancient woodland is located within influence of the site and no ancient or veteran trees were identified during the survey.





Surroundings

2.12 The Site is bound by a grass field to the west which is the subject of two current planning applications (see Chapter 3). Letchmere Farm lies to the north-west, and the former RAF airfield to the north. Chilgrove Drive forms the eastern boundary of the site and Camp Road to the south, agricultural fields extend east and south beyond these roads.

Services and Facilities

2.13 The Site is located in close proximity to numerous residential developments in various stages of planning or construction which will deliver a range of facilities including shops and primary and secondary schools. These are highlighted in Table 2.1 of this Report.

Table 2.1: Access to Services

Local Facility	Approximate Walking Distance
Heyford Park Primary and Secondary School	570m
Heyford Park Innovation Centre	600m
The Heyford Hotel	600m
Bike and coffee shop	750m
Argos	750m
Sainsburys Local	750m
Heyford Smiles Dental Clinic	750m
Heyford Park Community Garden	1km
Park Keeps Pre-School	1km
Heyford Park Sports Hall	1.5km

- The nearest bus stops are approximately 400-700m from the centre of the site. These are located on Camp Road and provide access to Bicester and Oxford on the 250 bus route.
- 2.15 The services to Bicester take 20 minutes run up to every 15 minutes at peak times and every hour during off peak times.
- 2.16 The services to Oxford take up to an hour and run approximately every half hour, with some journeys requiring a change of bus services to reach Oxford.

Summary





2.17 The site is located in a sustainable location, with good access to existing local amenities and facilities, good public transport and pedestrian links.

3. RELEVANT BACKGROUND

3.1 There are a number of matters which provide useful context and understanding to the proposed development. These are set out below.

Planning History

Application Site

- 3.2 Part of the application Site (the Richborough Estates controlled parcel) has been the subject of one planning application (ref: 14/02025/HYBRID) that was withdrawn before determination. EP Barrus Ltd applied for a hybrid planning permission in December 2014 for the erection of a total of 22,000 sqm of warehouse and logistics floorspace. The application was withdrawn in April 2017 as the applicant found alternative premises within the District.
- 3.3 There have been several applications within the surrounding settlement which are of relevance and are considered within the remainder of this section.

Environmental Impact Assessment

- 3.4 A Request for an EIA Screening Opinion (21/04193/SO) for residential development comprising up to 230 dwellings on the application site was submitted to Cherwell District Council (CDC) on 17 December 2021. A response was received on 7 January 2022 confirming that in the view of CDC, the proposals constitute EIA development having regard to the criteria of Schedule 3 of the EIA Regulations 2017. CDC considered the cumulative effects of the proposals and the wider Heyford Park development needed to be assessed as part of the process.
- 3.5 A request for Screening Direction (ref: 22/00379/SD) was submitted to the Department for Levelling Up, Housing and Communities on 8 February 2022.
- 3.6 A response to the Screening Direction hadn't been received at the time of submission of the application. Nonetheless, in the interests of expediency, the applicant has undertaken the relevant assessment work and prepared an Environmental Statement to support the planning application.

Relevant Planning Applications

3.7 The following applications are of relevance to the application Site and the key applications are considered in turn below:

Table 3.1: Local Planning Applications

Application Reference	Address	Description	Decision Date
10/01642/OUT	Heyford Park Camp Road Upper Heyford Bicester	Proposed new settlement of 1075 dwellings including the retention and change of use of 267 existing military dwellings to residential use Class C3 and	22 December 2011





	Oxfordshire OX25 5HD	the change of use of other specified buildings, together with associated works and facilities, including employment uses, a school, playing fields and other physical and social infrastructure	
13/01811/OUT and 16/00627/REM	Land and former buildings at Dow Street, Upper Heyford	Erection of 60 dwellings and public open space with associated works	31 March 2016 and 31 August 2016
15/01357/F	Land East Of Larsen Road Heyford Park	Erection of 89 dwellings, creation of new access arrangement from Camp Road, creation of open space, hard and soft landscaping and associated ancillary works and infrastructure	Resolution to grant subject to Section 106 Agreement
16/00263/F	Buildings 485, 488 And Land Surrounding Those Buildings (Dorchester Phase 6) Heyford Park Camp Road Upper Heyford	Demolition of Buildings 485 and 488 and the erection of 43 dwellings with associated parking, infrastructure, landscaping and public open space	8 May 2017
16/02446/F	Heyford Park Camp Road Upper Heyford Bicester OX25 5HD	Erection of 296 residential dwellings (Use Class C3) comprising a mix of open market and affordable housing, together with associated works including provision of new and amended vehicular and pedestrian accesses, public open space, landscaping, utilities and infrastructure, and demolition of existing built structures and site clearance works	7 April 2020
18/00825/HYBRID	Heyford Park Camp Road Upper	A Hybrid application for 1,175 dwellings, retail uses, a medical centre, employment	5 November 2020





	Heyford Bicester OX25 5HD	uses, a new school, a community building, areas for indoor and outdoor sports, and additional education facilities	
19/00446/F	Heyford Park Camp Road Upper Heyford Bicester OX25 5HD	Erection of up to 57 residential units (Use Class C3) comprising a mix of open market and affordable housing, together with associated works including provision of vehicular and pedestrian accesses, public open space, landscaping, infrastructure and site clearance.	24 December 2019
21/03523/OUT	Land At Heyford Grange Letchmere Farm Camp Road Heyford Park	Outline planning application for the erection of up to 31 dwellings, public open space, landscaping, associated parking, vehicular access and ancillary works (all matters reserved except means of access)	Resolution to grant subject to Section 106 Agreement
21/02008/SCOP	Land At Junction of B430 and Camp Road, Heyford Park	Consultation on Environmental Statement Scoping Opinion request for nationally significant infrastructure proposal - Oxfordshire Strategic Rail Freight Interchange	Scoping Opinion issued

Heyford Park Camp Road Upper Heyford (Application: 10/01642/OUT and 18/00825/HYBRID)

- 3.8 These applications were the first major applications for the new settlement at the former RAF air base. The development includes upgrading the Chilgrove Drive and Camp Road junction to the south east corner of this application Site.
- 3.9 A Composite Parameter Plan submitted with the later 2018 hybrid application shows the extent of the proposals already with planning permission this is provided at Appendix 2 for reference.

Land East of Larsen Road Heyford Park (Application: 15/01357/F)





- 3.10 This site is located immediately to the west of the Application Site fronting Camp Road. The application was submitted by Pye Homes for 89 dwellings.
- 3.11 There is a resolution to grant the application subject to a Section 106 Agreement. The proposed Site Plan shows a landscaped eastern edge at the boundary with the Application Site and a footpath adjacent to this edge in a north-south direction to link Camp Road with the residential site to the north (see application below).

Land At Heyford Grange Letchmere Farm Camp Road Heyford Park (Application: 21/03523/OUT)

3.12 Pye Homes submitted an application for the second phase of the above referenced development in 2021. The application for 31 dwellings also has a resolution to grant planning permission subject to a Section 106 Agreement. The Illustrative Layout for the entire site is provided below for reference.



Figure 3.1: Combined masterplan submitted with application 21/03523/OUT

- 3.13 The Officer Report to planning committee on 10 March 2022 recommended approval of the scheme and confirms that the 'significant elements' of the scheme comprise:
 - Provision of further housing in order to meet the housing target and trajectory
 - Provision of over 30% affordable housing
 - A satisfactory mix of dwellings including smaller units





- The environmental improvement of the locality
- Integration and connectivity to the surrounding development.
- Retention of the main hedging and trees
- 3.14 These key elements are carried forward into the proposed scheme and are reflected in the Illustrative Layout and associated Parameter Plans.

Land At Junction of B430 and Camp Road, Heyford Park (Application: 21/02008/SCOP)

3.15 A Scoping Opinion request was submitted on 7 June 2021 in respect of a Nationally Significant Infrastructure Project at land to the east of the application Site (see below). Oxfordshire Railfreight Interchange Limited is due to apply for a Development Consent Order for a Strategic Rail Freight Interchange (SRFI) and associated warehousing land uses. It is understood the provisional timeframe for submission of the NSIP application is December 2022. CDC's response to the Scoping request was issued July 2021.

Figure 3.2: Extract of Draft Layout submitted with the Scoping application 21/02008/SCOP



- 3.16 Whilst the layout is in draft form, there is a substantial landscaped buffer proposed on the western boundary of the SRFI site, hence reducing the risk of any effects on potential future residents at the application Site.
- 3.17 The possible development of this large parcel of land to the east of the application Site and to the east of Heyford Park would result in the application site being surrounded by built development on three sides.





Parish Council and Pre-application Consultation

3.18 The application is submitted with a Statement of Community Involvement which summarises the consultation undertaken with CDC Planning Officers and the local Parish Council.

4. PROPOSED DEVELOPMENT

Proposals

- 4.1 The description of development is:
 - "Outline planning application for the erection of up to 230 dwellings, creation of new vehicular access from Camp Road and all associated works"
- 4.2 The accompanying Design and Access Statement provides a detailed description and assessment of the proposed development. Whilst the proposals are submitted in outline, the Illustrative Layout includes a mix of house types and tenure, helping to meet the need for market and affordable housing in the local area and the wider Cherwell District.
- 4.3 The Design and Access Statement also explains how the design has evolved in response to an appraisal of the opportunities and constraints of the site, including its surroundings, wider planning context, as well as pre-application feedback from CDC. Further details are also contained within the accompanying technical reports.
- 4.4 The proposed development will contribute to the creation of an enhanced community at Heyford Park, supported by existing connectivity and transport routes, services and amenities and employment opportunities.
- 4.5 Access to green space and play space will ensure a pleasant environment for people to live whilst improving health and wellbeing for new and existing nearby residents. Promoting access to nature will encourage walking, jogging, cycling and other recreational activities.
- 4.6 A summary of the proposal is provided below.
 - Up to 230 residential dwellings (including 35% affordable housing delivered in accordance with current adopted planning policy);
 - Creation of a new vehicular access point on to Camp Road;
 - Structural landscape planting of green infrastructure to create an informal open space and recreation routes through the 'wet corridor' incorporating the existing ponds along the western edge of the site and provision of a LAP and LEAP;
 - New access arrangements including footway/cycle links to adjacent residential and employment areas.

Design

- 4.7 The design concept is centred around the themes of connectivity, character and community, delivered through a high-quality, landscape-led proposal for Heyford Park.
- 4.8 An Illustrative Layout has been prepared to demonstrate one way in which the site could be developed, whilst considering the technical and environmental assessments that have been





undertaken and feedback that has been received from CDC. This is supported by a series of Parameter Plans which have been produced to illustrate the key principles and which will provide a sound framework on which to secure the final design at reserved matters stage. The Land Use Parameter Plan (ref: 374_P01) broadly shows the location of residential development parcels within the site.

- 4.9 The design of the scheme will retain the local character of the area as existing and as proposed through the new settlement allocation at the former RAF air base, some areas of which are currently being developed. The proposals will ensure that the site is not overdeveloped and complement the framework set out for the neighbouring sites.
- 4.10 The submitted Illustrative Layout demonstrates how the proposed numbers of dwellings could be accommodated on the site, 35% of which will be affordable housing. The housing mix is reflective of evidenced local housing needs and consists of a mix of apartments, detached, semi-detached and terraced homes. It is the intention that the affordable dwellings would be integrated throughout the development and be tenure blind to create an integrated community. The table below sets out the mix in percentage terms which has been allowed for through the development of the Illustrative Layout. This broadly (+/- 1-3%) follows the mix which is advocated in the SHMA 2014.

Table 4.1: Proposed Dwelling Mix

	1 Bed	2 Bed	3 Bed	4+ Bed
Market	4.14%	25.52%	46.21%	24.14%
Affordable	25.52%	34.18%	35.44%	5.06%

- 4.11 In accordance with Local Plan Part 1 Policy BSC3, 35% of the dwellings will be provided as affordable based on a tenure split to be agreed at detailed design stage but anticipated to be 70% social rented and 30% intermediate.
- 4.12 The submitted Density Parameter Plan (ref: 374_P04) confirms that a minimum density of 40 dwellings per hectare is proposed with higher densities of 45 dwellings per hectare appropriate towards the centre of the southern parcel. The density parameters have evolved during the preparation of the application in accordance with the pre-application discussion with CDC Officers. An efficient use of the developable area was considered to be a positive design element for this location.
- 4.13 The Building Heights Parameter Plan (ref: 374_P03) establishes maximum permissible building heights across the development areas, responding to views of and across the site identified by the Landscape and Visual Impact Assessment. Building heights on the northern and eastern boundary of the site are restricted to a maximum of 2-storeys. Buildings to the south of the northern parcel and to the west of the southern parcel are limited to 2.5-storeys, which for the avoidance of doubt, includes 2-storey buildings with accommodation in the roof space which could result in dormer windows and/or roof lights as features of the roofscape. The central section of the southern parcel is then considered suitable for buildings of up to 3-storeys, in line with the Density Parameter Plan.





Access

- 4.14 The proposed site access junction will take the form of a new priority T-junction with Camp Road (shown on Drawing T19562.001 rev A in the submitted Transport Assessment). Footway provision on the western side is 2.0m in width, with shared footway/cycleway provision on the eastern side at 3.0m width.
- 4.15 The site access has been agreed in principle with Oxfordshire County Council. Visibility at the junction is provided in accordance with the prevailing speed limit of 30mph, with 2.4m x 59m splays in both directions, in line with Manual for Streets standards.
- 4.16 Connections will be provided to the pedestrian/cycle network associated with the wider Heyford Park development and surrounding network of bridleways. The Illustrative Layout shows the provision of an east/west footpath and cycle link within the site, north of the existing hedgerow, linking Heyford Park to the Camp Road/Chilgrove Drive junction.
- 4.17 The Access and Movement Parameter Plan (ref: 374_P02) denotes the site access location, the street hierarchy and footpath and cycle routes through the site and to Camp Road and Chilgrove Drive.
- 4.18 The Illustrative Layout also shows that parking standards can be met for the development with parking provided on plot, either in garages or driveways, or in some circumstances on street allocated parking spaces. Adequate storage for bikes will be made at all properties.

Open Space

- 4.19 The Illustrative Layout and the Open Space and Landscape Parameter Plan indicates that the western part of the Site will be retained for open space, which is shown to be inclusive of;
 - Areas of play provision, which is to include a Local Area of Play (LAP) and a Local Equipped
 Area of Play (LEAP);
 - A green corridor covers the majority of the western half of the Site. This will link various habitats including ponds and mature vegetation;
 - A series of pathways to be used for nature walking trails and social activities
 - Focal green spaces have been incorporated to the south of the Site for informal play and gathering;
 - Retained and reinstated planting within the Site; and
 - Swales and attenuation basins that form the sustainable drainage system.
- 4.20 The proposed landscaping will be soft and native to reflect the location of the Site on the edge of the settlement whilst enhancing the existing landscape character of the area. One of the key concepts of the proposal is the inclusion of green corridors integrated with pedestrian routes, offering connectivity between the development and the existing village. These corridors will serve both recreational and ecological purposes, providing naturalistic walking routes on desire lines, whilst offering habitats for wildlife and play.





5. PLANNING POLICY

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications should be determined in accordance with the up-to-date adopted development plan unless material considerations indicate otherwise.
- 5.2 In this context, the planning policy of relevance to the determination of this planning application is contained within the following documents:
 - Cherwell Local Plan 2011-2031 (Part 1) (incorporating the re-adopted Policy Bicester 13) –
 July 2015 (re-adopted on 19 December 2016);
 - Cherwell Local Plan 2011-2031 (Part 1) Partial Review Oxford's Unmet Housing Need (adopted on 7 September 2020);
 - Saved policies of the adopted Cherwell Local Plan 1996 that have not been replaced –
 November 1996 (policies were saved from 27 September 2007); and
 - Mid Cherwell Neighbourhood Plan (2018-2031) Made 14 May 2019.

Development Plan

Site Specific Policies

5.3 The below provides an extract from the Adopted Policies Map:



- 5.4 There are no site-specific policies, and it is evident from the above map that the proposed development adjoins the boundary of the Policy Villages 5 boundary.
- 5.5 The following sections describe the relevant adopted development plan policies.





Cherwell Local Plan (Part 1)

- 5.6 The Local Plan (Part 1) was formally adopted on 20 July 2015, although the addition of Policy Bicester 13 meant that the Plan was re-adopted on 19 December 2016. The document only deals with strategic site allocations and Part 2 was due to allocate smaller sites. However, Part 2 has not been progressed and will be replaced by the emerging Local Plan 2040. The key policies from Part 1 of the Local Plan, in relation to the proposed development, are identified below.
- 5.7 **Policy PSD1 Presumption in Favour of Sustainable Development** establishes that when considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the NPPF.
- 5.8 Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision, then the Council will grant permission unless material considerations indicate otherwise.
- 5.9 **Policy BSC1 District Wide Housing Distribution** establishes that 22,840 homes will be delivered between 1 April 2011 and 31 March 2031. The table within the policy makes it clear the housing strategy for the district concentrates development at Bicester and Banbury, with a proportion of housing (5,392 dwellings) also to come forward across the rest of the district including at identified brownfield locations, such as the former RAF Upper Heyford airbase (Policy Villages 5). An allowance is also made for windfall development.
- 5.10 Policy BSC2 The Effective Use of Land Brownfield Land and Housing Density encourages the effective and efficient use of land through the re-use of previously developed land in sustainable locations. The policy also specifies that new housing should be provided on net developable areas at a density of at least 30 dwellings per hectare unless there are justifiable planning reasons for lower density development.
- 5.11 The supporting text identifies certain previously developed sites where redevelopment is sought, including the former RAF Upper Heyford airbase (Policy Villages 5)¹.
- 5.12 **Policy BSC3 Affordable Housing** confirms that all residential development in Banbury and Bicester of 11 or more dwellings will be required to provide at least 30% affordable housing on site. In Kidlington and the rest of the district, development proposals are expected to provide at least 35% affordable housing on site. Of this, 70% will be expected to be affordable/social rented and 30% intermediate affordable homes.
- 5.13 **Policy BSC4 Housing Mix** seeks to ensure that residential development comprises a mix of sizes that meet the requirements of the community. The mix of housing will be negotiated having regard to the Council's most up-to-date evidence on housing need and available evidence from developers on local market conditions. Table 67 of the Oxfordshire Strategic Housing Market Assessment (SHMA 2014) is included within the supporting text to the policy and setting out the following needs:

-

¹ Paragraph B.101, Local Plan (Part 1)





Table 5.1: Oxfordshire SHMA (2014) dwelling requirement for Cherwell

	1 Bed	2 Bed	3 Bed	4+ Bed
Market	6.2%	23.1%	46.2%	24.6%
Affordable	28.3%	31%	36.9%	3.7%

- 5.14 The supporting text notes that at an individual local authority level, there is a greater need for 3-bed properties than in Oxfordshire.
- 5.15 **Policy BSC10 Open Space, Outdoor Sport and Recreation Provision** seeks to ensure convenient access to a sufficient quantity and quality of open space, sport and recreation provision is secured through requiring new development to contribute to open space, sport and recreation provision commensurate to the need generated by the proposals.
- Policy BSC11 Local Standards of Provision Outdoor Recreation requires development proposals to accommodate a level of outdoor space proportionate to the quantum of housing proposed. The supporting text includes Table 7 "The Local Standards of Provision Outdoor Recreation" provides minimum size standards for each typology, which are defined in Table 8. Whilst these are intended to act as a guide for developers, the composition of provision will depend on the details of the proposal and its location. For larger developments (10 dwellings or more in urban areas and 6 dwellings or more in rural areas) it is intended that provision should be made on site unless this is not possible or appropriate.
- 5.17 Policy ESD3 Sustainable Construction expects new residential development to incorporate sustainable design and construction technology through a combination of fabric energy efficiency, carbon compliance and allowable solutions in line with Government policy. All developments will be encouraged to reflect a high quality design and high environmental standards.
- 5.18 **Policy ESD5 Renewable Energy** requires a feasibility assessment of the potential for significant on site renewable energy provision (above any provision required to meet national building standards) for all residential developments over 100 dwellings.
- 5.19 **Policy ESD6 Sustainable Flood Risk Management** seeks to ensure that a flood risk assessment should be provided for development proposals on sites over a hectare and that covers all sources of flood risk and the management of surface water.
- 5.20 **Policy ESD7 Sustainable Drainage Systems (SuDS)** requires all development to use sustainable drainage systems (SuDS) for the management of surface water run-off.
- 5.21 Policy ESD10 Protection and Enhancement of Biodiversity and the Natural Environment establishes that development proposals will ensure ecological networks and services, biodiversity and geological features are conserved and enhanced where appropriate. A net gain in biodiversity will be sought by protecting, managing, enhancing and extending existing resources, and by creating new resources.





- 5.22 Policy ESD13 Local Landscape Protection and Enhancement confirms that development will be expected to respect and enhance local landscape character, securing appropriate mitigation where damage to local landscape character cannot be avoided.
- 5.23 Policy ESD15 The Character of the Built and Historic Environment requires new development to meet aeries of design criteria. This includes contributing positively to an area's character and identity by creating or reinforcing local distinctiveness and respecting local topography and landscape features. Proposals should also include information on heritage assets sufficient to assess the potential impact of the proposal on their significance.
- 5.24 **Policy ESD17 Green Infrastructure** seeks to ensure that green infrastructure network considerations are integral to the planning of new development. Proposals should maximise the opportunity to maintain and extend green infrastructure links to form a multi-functional network of open space, providing opportunities for walking and cycling, and connecting the towns to the urban fringe and the wider countryside beyond.
- Policy Villages 2 Distributing Growth across the Rural Areas states that a total of 750 homes will be delivered at Category A villages. This will be in addition to the rural allowance for small site 'windfalls' and planning permissions for 10 or more dwellings as at 31 March 2014. The policy states that sites will be identified through the preparation of the Local Plan Part 2 through the preparation of Neighbourhood Plans where applicable, and through the determination of applications for planning permission. However, the Local Plan Part 2 has not proceeded in order to allocate sites under 100 dwellings.
- 5.26 **Policy Villages 5 Former RAF Upper Heyford** comprises a mixed brownfield and greenfield allocation which seeks to secure the delivery of a lasting arrangement on the large scale site.
- 5.27 The site specific policy confirms that the allocation will provide 1,600 dwellings (in addition to the 761 dwellings (net) already permitted) and necessary supporting infrastructure, including primary and secondary education provision and appropriate community, recreational and employment opportunities. This will enable the environmental improvements and the heritage interest of the site as a military base with Cold War associations to be conserved, compatible with achieving a satisfactory living environment.
- 5.28 **Policy INF1 Infrastructure** requires development to demonstrate that infrastructure requirements can be met either within existing capacity; a financial contribution to increase capacity; or providing that increased capacity directly.
- 5.29 Policy SLE4 Improved Transport and Connections requires new development in the District to provide financial and/or in-kind contributions to mitigate the transport impacts of development. All development where reasonable to do so, should facilitate the use of sustainable modes of transport to make the fullest possible use of public transport, walking and cycling. Development which is not suitable for the roads that serve the development, and which have a severe traffic impact will not be supported.
- 5.30 Further policies of relevance are listed below:
 - Policy BSC9: Public Services and Utilities
 - Policy ESD1: Mitigating and Adapting to Climate Change





- Policy ESD2: Energy Hierarchy and Allowable Solutions
- Policy ESD8: Water Resources
- Policy ESD11: Conservation Target Areas

Cherwell Local Plan (Part1) Partial Review

5.31 The Partial Review of the Cherwell Local Plan 2011-2031 (Part 1) is part of the statutory Development Plan for the district and should be considered alongside the existing Local Plan. This Partial Review was adopted on 7 September 2020 and relates specifically to Oxford's unmet housing need, which is also monitored separately for housing land supply purposes. However, given the location of the site in relation to Oxford, this document is not considered relevant to this planning application.

Adopted Cherwell Local Plan 1996 - Saved Policies

- 5.32 The following saved policies from the adopted Cherwell Local Plan 1996 are considered relevant to this planning application:
 - Policy H18: New dwellings in the countryside
 - Policy C8: Sporadic development in the open countryside
 - Policy C23: Retention of features contributing to character or appearance of a Conservation Area
 - Policy C28: Layout, design and external appearance of new development
 - Policy C30: Design control
 - Policy C31: Compatibility of Proposals in Residential Areas
 - Policy ENV12: Contaminated Land

Mid-Cherwell Neighbourhood Plan

- 5.33 The Mid-Cherwell Neighbourhood Plan (MCNP) was made in May 2019 and comprises a consortium of Parish Councils, including Upper Heyford Parish Council. All of the Parish Councils have a close functional relationship to the only strategic employment site outside of the main towns and Banbury and Bicester the former RAF Upper Heyford Site (Policy Villages 5).
- 5.34 The MCNP confirms that the significant infrastructure investment resulting from the development of Heyford Park is a strength and that there is an opportunity to ensure local residents' housing needs are met within the neighbourhood. Paragraph 3.2.1 of the MCNP confirms:

"The Mid-Cherwell Neighbourhood Plan supports sustainable development. The existence within the designated area of a large and growing residential development at Heyford Park, which may ultimately reach a total of 2,675 dwellings, as set out in the adopted Cherwell Local Plan policy Villages 5, is accepted and supported by the Neighbourhood Plan Forum."





- Policy PD3 Development Adjacent to Heyford Park requires that new development should not give rise to coalescence with surrounding settlements. The policy identifies a zone of non-coalescence on the western side of Heyford Park to prevent coalescence with the village of Upper Heyford. The policy states that within this zone, the land should remain in predominantly agricultural use.
- 5.36 Particular reference is made to the western boundary of Heyford Park and a proposed buffer zone with Upper Heyford. Further, a buffer zone to the south of Heyford Park is proposed to ensure the separate identity and character of Caulcott as a rural hamlet is maintained.

Supplementary Planning Documents

- 5.37 Since the adoption of the Local Plan Part 1, CDC has prepared several Supplementary Planning Documents (SPD's). Those most relevant to the proposals are set out below.
- 5.38 **Cherwell Residential Design Guide SPD (2018)** seeks to inform the design of residential development proposals to ensure high quality design that protect the amenity of existing and new residents.
- 5.39 **Cherwell Developer Contributions** SPD (2018) sets out CDC's approach to ensuring that Section 106 Agreements can be used to address the impacts of developments sufficiently.

Other Material Considerations

5.40 There are several key documents and issues which are capable of being material considerations in the determination of this planning application. These points are considered in turn below.

A National Housing Shortage

- 5.41 Since the publication of the original National Planning Policy Framework ("NPPF") in March 2012, the Government has repeatedly emphasised its commitment to boosting significantly the supply of housing. In order to do so, it has introduced a series of reforms aimed at speeding up and increasing the delivery of new housing.
- Following the General Election in May 2017, the Queen's Speech on 22 June 2017 set out the newly elected Government's legislative programme for the next two years; confirming the Government's pledge to take forward a series of commitments in the Housing White Paper (HWP) and "to help ensure more homes are built".
- 5.43 The HWP reaffirmed the scale and significance of the national housing challenge:

"The housing shortage isn't a looming crisis, a distant threat that will become a problem if we fail to act. We're already living in it. Our population could stop growing and net migration could fall to zero, but people would still be living in overcrowded, unaffordable accommodation

If we fail to build more homes, it will get even harder for ordinary working people to afford a roof over their head, and the damage to the wider economy will get worse."²

5.44 The implications of the housing shortage for economic growth are clear:

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² Page 15, Housing White Paper: Fixing our broken housing market (DCLG, February 2017)





"Sky-high property prices stop people moving to where the jobs are. That's bad news for people who can't find work, and bad news for successful companies that can't attract the skilled workforce they need to grow, which is bad news for the whole economy." 3

5.45 The Secretary of State was emphatic on what needs to change:

"We need radical, lasting reform that will get more homes built right now and for many years to come."

- The proposed reforms included within the HWP included the introduction of the Housing Delivery Test and a standard method of calculating local housing need. The Government subsequently revised the Framework in 2019 to accommodate these measures amongst others, largely as a result of the continuing political commitment to increasing the delivery of housing in order to help 'tackle' the housing crisis.
- 5.47 A Planning White Paper, titled 'Planning for the Future, was published in 2020. The introduction highlighted several problems which hinder the planning process, one of which was housing delivery, highlighting that:

"It simply does not lead to enough homes being built, especially in those places where the need for new homes is the highest. Adopted Local Plans, where they are in place, provide for 187,000 homes per year across England – not just significantly below our ambition for 300,000 new homes annually, but also lower than the number of homes delivered last year (over 241,000). The result of long-term and persisting undersupply is that housing is becoming increasingly expensive, including relative to our European neighbours. In Italy, Germany and the Netherlands, you can get twice as much housing space for your money compared to the UK. We need to address the inequalities this has entrenched"⁵

- 5.48 In 2020/21, net growth of 216,940 dwellings was recorded in the UK, which is an 11% fall from the previous year. Over the last available five-year period (2015/16 2020/21), average net growth amounted to 228,140 dwellings per annum (dpa).
- 5.49 Whilst housing delivery across the country has increased, it is still well short of the Government target of 300,000 new homes per annum.
- 5.50 In November 2021, the Land Promoters and Developers Federation (LPDF) published a Paper titled 'The Housing Emergency', which is appended to this Statement as Appendix 2. This highlighted research undertaken by Shelter which identified that around 17.5 million in England (around 1/3 of the population) live in overcrowded, dangerous, unstable or unaffordable housing⁶.
- 5.51 Research undertaken by the LPDF shows that during the last 11 years, the number of households who are renting has increased by 24% and during this period, the mean rent has increased by

³ Page 11, Housing White Paper: Fixing our broken housing market (DCLG, February 2017)

⁴ Foreword by Rt Hon. Sajid Javid MP, Secretary of State, Housing White Paper: Fixing our broken housing market (DCLG, February 2017)

⁵ Page 14, Planning White Paper: Planning For The Future (MHCLG, August 2020)

⁶ Denied the right to a safe home: exposing the housing emergency (Shelter, 2021)





46%. It is findings such as this which explain why the average age of the first time buyer continues to rise, and in 2019/20 stands at 34 years old⁷.

5.52 The Housing Emergency paper also highlights research from Heriot-Watt University, which indicates that housing need may actually be much higher that the Government target, somewhere in the region of 340,000 dpa. Both the Heriot-Watt research and the Government are in unison on the position that this is not a matter for future generations to address and needs to be tackled now if there is any hope of abating the emergency.

National Planning Policy Framework (NPPF)

- 5.53 The Revised NPPF was published in July 2021 and sets out the Government's planning policies for England and how they are expected to be applied in decision-making and plan making. It does not form part of the statutory development plan but does provide significant guidance for Local Planning Authorities, establishing an up to date and comprehensive expression of national planning policy.
- 5.54 Those elements of the NPPF identified as most relevant to this application are discussed in more detail below.

Achieving Sustainable Development

- 5.55 Paragraph 10 sets out that a 'presumption in favour of sustainable development' is at the heart of the Framework and should be applied to plan-making and decision-taking to ensure that sustainable development is pursued in a positive way.
- 5.56 Paragraph 11 defines the presumption in favour of sustainable development as approving development proposals that accord with an up to date development plan.
- 5.57 The clear expectation running throughout the NPPF is that sustainable development should be positively embraced to deliver the necessary economic growth and housing needed to create inclusive and mixed communities. Local Planning Authorities (LPAs) are therefore encouraged to approach decisions on proposed developments in a positive manner and should apply a presumption in favour of sustainable development and approve development proposals that accord with an up-to-date development plan without delay⁸.

Development Plans

- 5.58 Paragraph 12 of the NPPF reiterates the status of the Development Plan as the starting point for decision making.
- 5.59 Paragraph 219 of the Framework identifies that existing policies should be given due weight should be given to policies in accordance with their degree of consistency with the Framework.

Housing Development

5.60 In order to support the Government's objective of "significantly boosting the supply of homes", paragraph 60 of the Framework reiterates the importance of ensuring that a sufficient amount of variety of land can come forward where it is needed, that the needs of groups with specific

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⁷ ONS (2021)

⁸ Paragraph 11 and 38





housing requirements are addressed and that land with planning permission is developed without delay.

- Paragraph 62 of the NPPF states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.
- Paragraph 63 of the Framework sets out that where there a need for affordable housing is identified, planning policies should specify the type of affordable housing required and expect it to be met on-site unless off-site provision or an appropriate financial contribution in lieu can be robustly justified and the agreed approach contributes to the objective of creating mixed and balanced communities.
- Paragraphs 74 to 77 of the Framework provide policy direction in regard to maintaining the supply and delivery of housing in order to assist the Government in significantly boosting supply. In particular, the Framework required LPAs to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old (unless these strategic policies have been reviewed and found not to require updating).
- 5.64 Paragraph 124 relates to making effective use of land and states that:

"Planning policies and decisions should support development that makes efficient use of land, taking into account:

- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
- b) local market conditions and viability;
- c) the availability and capacity of infrastructure and services both existing and proposed as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
- d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
- e) the importance of securing well-designed, attractive and healthy places."

Promoting healthy and safe communities

Paragraph 92 of the Framework identifies that development should aim to achieve, healthy, inclusive and safe places by promoting social interaction, creating a safe and accessible environment so that crime and disorder do not undermine the quality of life or community cohesion and enabling and supporting healthy lifestyles.

Achieving well-designed places

- 5.66 Chapter 12 of the NPPF confirms that the creation of high quality development is fundamental to what the planning and development process should achieve.
- 5.67 Paragraph 126 states that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.





- 5.68 Paragraph 130 reiterates that planning policies and decisions should ensure developments:
 - will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
 - are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
 - establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
 - optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
 - create places that are safe, inclusive and accessible and which promote health and wellbeing, with a high standard of amenity for existing and future users49; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Conserving and enhancing the Natural Environment

5.69 Paragraph 174 if the Framework states that development should help to improve local environmental conditions.

Other relevant chapters

- 5.70 Other chapters of the Framework seek to ensure that development:
 - Builds a strong competitive economy;
 - Promotes sustainable transport;
 - Meets the challenge of climate change, flooding and coastal changes;
 - Conserves and enhances the historic environment; and
 - Facilitates the sustainable use of materials.

National Planning Practice Guidance

5.71 The National Planning Practice Guidance (PPG) has been issued by Government as a technical companion to the NPPF. The PPG is an online resource which is subject to ongoing review and update.





National Design Guide

- 5.72 Published by the Government in October 2019, the National Design Guide sets out the characteristics of well-designed places and seeks to demonstrate what good design means in practice.
- 5.73 The guidance sets out 10 key characteristics of well-designed places which all work together to create character; help nurture and sustain a sense of community; and address environmental issues affecting climate. These 10 characteristics are set out as follows:
 - Context: enhances the surrounding. Understand and relate well to the site, its local and wider context. Value heritage, local history and culture.
 - Identity: attractive and distinctive. Respond to existing local character and identity; well-designed, high quality and attractive; and create character and identity.
 - Built form: a coherent pattern of development. A compact form of development; appropriate building types and forms and, destinations.
 - Movement: accessible and easy to move around. An integrated network of routes for all modes of transport; a clear structure and hierarchy of connected streets; and wellconsidered parking, servicing and utility infrastructure for all users.
 - Nature: enhanced and optimised. Provide high quality, green open spaces with a variety
 of landscapes and activities, including play; improve and enhance water management;
 and support rich and varied biodiversity.
 - Public spaces: safe, social and inclusive. Create well-located, high quality and attractive public spaces; provide well-designed spaces that are safe; and make sure public spaces support social interactions.
 - Uses: mixed and integrated. A mix of uses; a mix of home tenures, types and sizes.
 - Homes and buildings: Functional, healthy and sustainable. Healthy, comfortable and safe internal and external environment, well-related to external amenity and public spaces.
 - Resources: efficient and resilient. Follow energy hierarchy; selection of materials and construction technique.
 - Life Span: made to last. Well-managed and maintained; adaptable to changing needs and evolving technologies.

Cherwell Housing Strategy 2019-2024

- 5.74 The Housing Strategy 2019-2024 outlines the Council's aspirations in terms of the delivery of housing, particularly affordable housing, in this period. Key relevant priorities in terms of the application are as follows:
 - Increase the supply and diversity of affordable housing to ensure the right types of housing are available in the right places; and





Enhance opportunities for residents to access suitable homes and have housing choices.

Emerging Planning Policy

Cherwell Local Plan Review 2040

- 5.75 In 2020 CDC concluded that a new Local Plan was required in order to reflect a different context in government planning policy as well as other issues such as climate change and regional planning matters.
- 5.76 A new district wide Local Plan to 2040 is being prepared to meet assessed development needs for employment, housing, leisure, community facilities and infrastructure and to provide a strategy for the pattern scale and quality of development across the district.
- 5.77 Consultation on a Community Involvement Paper took place between 31 July and 14 September 2020. This was undertaken with a view to understanding the main social, environmental and economic issues and needs for the plan period. The document includes a specific section on Heyford Park suggesting that consideration will need to be given to categorising the site as a settlement as part of the new Local Plan.
- 5.78 Consultation on Community Involvement Paper 2 took place between 29 September and 10 November 2021. The document set out the draft vision and objectives as well as a series of policy options to shape and direct development.
- 5.79 The document includes a section on Heyford Park which confirms that responses to the first paper recognised that Heyford Park will continue to play an important role in contributing to the housing and employment needs of the district.

Oxfordshire Plan 2050

- 5.80 In February 2018, all local authorities in Oxfordshire signed a Housing and Growth Deal, providing £215 million of central government funding in return for delivering 100,000 new homes between 2011 and 2031. The figure of 100,000 homes across the county is broadly reflective of the need for homes identified within the 2014 Oxfordshire SHMA.
- As part of the Oxfordshire Housing and Growth Deal agreement, the local authorities Cherwell District Council, Oxford City Council, Oxfordshire County Council, South Oxfordshire District Council, Vale of White Horse District Council and West Oxfordshire District Council, have committed to producing a Joint Strategic Spatial Plan (JSSP) for Oxfordshire the Oxfordshire Plan 2050.
- 5.82 The Oxfordshire Plan will provide an integrated planning framework and evidence base to support sustainable growth across the county to 2050. This includes the planned delivery of new homes, economic development and the anticipated supporting infrastructure.
- 5.83 Consultation on the Regulation 18 (Part 2) version of the Oxfordshire Plan took place between 30 July and 8 October 2021.





Supporting Evidence

Five Year Housing Land Supply

- 5.84 CDC's most recent position on the five year housing land supply within the District is the 2021 Annual Monitoring Report (AMR), establishing the position up to April 2021. This confirms that since the beginning of the plan period in 2011, 9,806 dwellings have been completed, which results in a shortfall of 1,604. The calculation provided in Table 17 of the AMR claims a deliverable supply of 5,826 dwellings over the next five years. This results in a claimed five year supply figure of 3.8 years, which is shortfall of 1,864 dwellings.
- 5.85 Table 17 indicates that the position is set to worsen from April 2022, as the supply figure is projected to drop to 3.5 years.





6. PLANNING ASSESSMENT

6.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that:

"If regard is to be had to the Development Plan for the purposes of any determination to be made under the Planning Acts, the determination must be made in accordance with the Plan unless material considerations indicate otherwise"

- This is a reiteration of the presumption in favour of development that accords with an up-to-date development plan in Section 54A of the 1990 Act; also reinforced by paragraph 47 of the NPPF.
- 6.3 The NPPF also makes clear that development plans should be kept up-to-date and in accordance with its policies and the presumption in favour of sustainable development. However, that presumption does not change the statutory status of the development plan as the starting point for decision making. Nevertheless, LPAs may make decisions that depart from an up-to-date development plan where material considerations in a particular case indicate that the plan should not be followed.
- 6.4 Having identified relevant development plan policies and other material considerations in Section 5 of this statement, the following paragraphs go on to assess the development proposals against the policies of the development plan and reviewing against other material considerations.

Compliance with the Development Plan

Principle of Development

- Policy BSC1 of the Local Plan Part 1 confirms that CDC will provide for 22,840 additional dwellings across the plan period (2011-2031), which equates to an average of 1,142 dpa. The policy also confirms that outside of the main towns of Bicester and Banbury, 5,392 dwellings will be delivered in the 'rest of the district', which comprises rural areas.
- Policy Villages 5 of the Local Plan Part 1 relates to the former RAF Upper Heyford and comprises a mixed brownfield and greenfield allocation which is identified as a strategic site for a new settlement in the rural area¹⁰, known as 'Heyford Park'. The allocation seeks to secure the delivery of 1,600 dwellings (in addition to the 761 dwellings (net) already permitted) and necessary supporting infrastructure, including primary and secondary education provision and appropriate community, recreational and employment opportunities. The subject site lies immediately adjacent to the land allocated through Policy Villages 5 and would provide an obvious rounding off of the settlement within the extent of Camp Road and Chilgrove Drive.
- 6.7 Chapter 3 of this statement also references a Scoping Opinion for a Strategic Rail Freight Interchange (SRFI) and associated logistics/warehousing facilities on land adjacent Chilgrove Drive. This development would be a Nationally Significant Infrastructure Project and, if approved, would considerably extend built development to the east of Heyford Park. The SRFI would result in the application Site being surrounded by development on 3 sides. In this context, the Site should be considered infill development within a key strategic location, in both a local and national context.

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⁹ Paragraph 12, NPPF

¹⁰ Paragraph xxi., page 14, Local Plan Part 1





- The Site is also located outside of the area zoned for non-coalescence as part of Policy PD3 of the MCNP. These areas are located on the western side of Heyford Park and seek maintain a green buffer to Upper Heyford and Caulcott.
- 6.9 The former RAF Upper Heyford air base should be regarded as one of the most sustainable locations outside of Bicester and Banbury. This is acknowledged in the emerging Local Plan document which states that consideration will need to be given to categorising the site as a settlement as part of the new Local Plan. Heyford Park has a number of services that are within walking and cycling distance of the site, and it is in close proximity to Bicester, accessible by bus (an hourly service can be reached in a 10-15 minute walk) and by cycling.
- 6.10 Paragraph C.250 of the Local Plan Part 1 establishes the approach to providing development in rural areas and focuses on the following points:
 - Delivery of a new settlement at the former RAF Upper Heyford to contribute in meeting
 Cherwell wide and local housing needs
 - Provide new housing for people in rural areas to meet the needs of newly forming households
 - provide affordable housing in what are generally areas of higher housing cost
 - deliver housing at villages where local shops, services and job opportunities are available and accessible or where access to nearby towns would be sustainable in transport terms.
- As set out in this document, and the wider submission, the proposed development would assist in meeting these aims on a site that can be easily integrated with Heyford Park.
- 6.12 The AMR 2021 includes a Housing Delivery Monitor which indicates that there have been completions of 674 dwellings at Heyford Park, up to April 2021. The table also confirms that there are 509 dwellings with planning permission, which together total 1,183 dwellings.
- 6.13 The projected delivery over the next ten years is also included and equates to an average of 145dpa. This level of delivery is well in excess of the average completions over the last five years, which is only 88dpa¹¹. Even if the projected delivery comes to fruition, the estimated total delivery at Heyford Park by the end of the plan period would be 2,124 dwellings, which is 237 dwellings short of the 2,361 figure quoted in Policy Villages 5. The proposed development of 230 dwellings, sited in a sustainable and logical infill location will therefore assist in meeting the adopted requirement for Heyford Park, as well as the wider rural area.

Five Year Supply

6.14 CDC's most recent position on the five year housing land supply within the District is the 2021 Annual Monitoring Report (AMR), establishing the position up to April 2021. This confirms that since the beginning of the plan period in 2011, 9,806 dwellings have been completed, which results in a shortfall of 1,604. The calculation provided in Table 17 of the AMR claims a deliverable supply of 5,826 dwellings over the next five years. This results in a claimed five year supply figure of 3.8 years, which is a shortfall of 1,864 dwellings.

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¹¹ Table 14, AMR (2021)





- Table 17 indicates that the position is set to worsen from April 2022, as the supply figure is projected to drop to 3.5 years. Clearly, this shortfall is serious and significant.
- 6.16 Therefore, in accordance with paragraph 11d of the NPPF, the tilted balance in favour of development is engaged and permission should therefore be granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits. The proposed development, if approved, would contribute significantly to the current five year supply which should be seen as a major benefit. The land promotion model adopted by Richborough Estates Ltd and Lone Star Land Ltd incentivises all parties (landowners, promoters and development partners) to ensure the prompt delivery of housing once permission has been granted.

Affordable Housing Delivery

6.17 The supporting text to Policy BSC3, confirms that CDC has a high level of need for affordable housing. Paragraph B.105 of the Local Plan Part 1 states that

"The Oxfordshire Strategic Housing Market Assessment (SHMA) 2014 has identified a net need of 407 affordable homes per year. This is calculated by taking into account the backlog need, need from newly forming households, existing households falling into need and the supply of affordable housing."

- 6.18 The AMR 2021 shows that since 2014, 2,422 affordable dwellings have been delivered. This equates to an average of 346dpa, which is a shortfall since 2014 of 427 affordable dwellings. This shortfall in affordable housing delivery should also be seen in the context of the overall performance against the adopted housing trajectory and the lack of an evidenced five year supply.
- 6.19 There is evidence of a negative social impact of the failure to deliver sufficient housing in the CDC over this period, with the house price to income ratio in the District deteriorating from 7.53 in 2011 at the beginning of the plan period to 9.63 in 2021¹². The under-delivery of housing has contributed to deteriorating affordability in the District. Affordability is a critical social component of sustainable development that acts as a barrier to local people being able to access the housing they need. The research paper published by LPDF titled 'The Housing Emergency', which is appended to this Statement as Appendix 2 highlights that 1 in 5 adults regard housing issues as negatively impacting their mental health¹³. It should be accepted that there is an urgent need to boost market and affordable housing delivery within CDC.

Weight to be attributed to Policy H18

- 6.20 Policy H18 of the Cherwell Local Plan 1996 seeks to restrict development beyond built up settlement limits. Paragraph 11(d) of the NPPF requires consideration as to whether the most important policies are out of date. Policy H18 must, however, be read alongside Policy Villages 5 in context of the application site.
- 6.21 There is a clear shortfall of housing (both market and affordable) measured against the adopted housing trajectory and the requirement to demonstrate a five year supply of deliverable sites. Policy H18 is one of the most important policies for determining the application and should be

¹² House price to residence-based earnings ratio, ONS (2022)

¹³ The impact of housing problems on mental health, Shelter (2017)





considered out of date and therefore afforded less weight in the determination of this application in accordance with Paragraph 11 of the Framework.

Conclusion on Principle of Development

- 6.22 Having regard to Section 38(6) of the Planning and Compulsory Purchase Act 2004, the principle of residential development at the site is in accordance with all relevant parts of the development plan that are up to date. The proposal is commensurate with the strategic objective of creating a new settlement at the Former RAF Upper Heyford.
- 6.23 Where a conflict with Policy H18 arises, this should be considered to be out date and afforded less weight by way of the fact that CDC cannot evidence a five year supply of deliverable housing sites, as required by Paragraph 74 of the NPPF. In accordance with paragraph 11d of the NPPF, the tilted balance should therefore be engaged, and planning permission granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- 6.24 In that context, the remainder of this Statement assesses the proposals to identify those benefits which should be considered in the overall planning balance. This is set out at Chapter 10.

Technical Matters

6.25 Having considered the principle of development, this section considers whether the proposed development is compliant with other relevant Development Plan Policies and the NPPF.

Design

- 6.26 The accompanying Design and Access Statement demonstrates how the scheme will deliver a high-quality landscape-led development as well as how the design has evolved in response to an appraisal of the opportunities and constraints of the site, including its surroundings.
- 6.27 The site is sustainably located north of Camp Road and west of Chilgrove Drive to the south east of the former RAF Upper Heyford air base allocation (Policy Villages 5). The Design and Access Statement provides a number of character appraisals of the surrounding residential areas in respect of density, character, scale and pattern of built development.
- 6.28 Whilst the proposals are submitted in outline, the Illustrative Layout shows how the proposed site could accommodate a scheme that would retain the landscape and natural features including the mature trees, hedgerows and water features. The Illustrative Layout demonstrates how appropriate buffers and landscape planting could be implemented to ensure there is no impact to adjoining neighbouring land uses, nor is there any impact on the proposed residents.
- 6.29 There are a number of planning applications on adjacent land as referenced at Chapter 4 of this Statement and shown at pages 14 and 15 of the Design and Access Statement. The residential and commercial land uses have been considered when preparing the Illustrative Layout and a key consideration has been in respect connectivity to these areas, linking spaces and places and integrating the site into the existing and growing settlement.
- 6.30 The Illustrative Layout shows the main vehicular access to be taken from Camp Road to the south via a new access point. The Layout demonstrates how a hierarchy of streets can then be used to define a legible movement framework within the site which contributes to the character of the area. A series of street typologies are shown on the Illustrative Layout which seek to define a transition from primary to secondary routes which contributes to the legibility of the place.





Shared private driveways have also been shown to create permeable and pedestrian friendly spaces.

- 6.31 This formation of linkages along with the vehicular routes defines the development blocks and provides clear links through the development. The continuity of the street pattern assists in defining the public realm, promotes an active street scene and helps to create a safe and attractive environment. This will help focus social activity and interaction in high quality and attractive public spaces. The routes established within the masterplan should incorporate biodiversity enhancement, overlooking from dwellings and the creation of well-designed public open space.
- 6.32 The development has been designed to take into account the existing vegetation and landscape features. There are existing native hedgerows that form the field boundaries which are overgrown and gappy in places. The Illustrative Layout suggests a buffer to these hedgerows and enhancement by the provision of additional planting where possible. New hedgerow and tree planting should be incorporated, particularly along the northern boundary, to provide additional screening and respect the setting of the adjoining Conservation Area. The Illustrative Layout proposes a 'wet corridor' along the west side of the Site which will provide residents with a high quality public open space.
- Dwellings along the eastern, northern and southern edges would be set back from the boundary and would be suitable for 2 storey dwellings with the 2.5 and 3 storey dwellings being located more centrally within the Site. The provision of higher density development in this location has been discussed with the Council as part of the pre-application process and a minimum density of 40dph is therefore shown on the submitted Density Parameter Plan with density increasing to 45dph within the middle of the southern parcel of the site.
- 6.34 The Illustrative Layout shows appropriate parking arrangements for the residential plots and full compliance with the parking standards will be agreed at a later reserved matters stage.
- As such, the proposal represents a high quality and attractive development in accordance with the requirements of saved Policy C28 and C30 and the NPPF.

Housing Mix

- 6.36 The scheme is in outline and the housing mix is not proposed to be fixed until a later reserved matters application is submitted. The Design and Access Statement and Illustrative Layout demonstrates that the site can accommodate a mix of housing to meet local needs and is in accordance with the requirements of Local Plan Part 1 Policy BSC4: Housing Mix.
- 6.37 The Design and Access Statement confirms that a mix of 1-5 bedroom properties can be accommodated on the site with building heights ranging between 2 and 3 storeys. The preapplication discussion confirmed that there was no identified need for bungalows in this area.
- 6.38 The scheme also includes affordable housing at a policy compliant rate of 35% and will ensure there is sufficient choice of housing for a balanced and inclusive community. The mix of affordable housing, including their location, size and tenure can be agreed at a later reserved matters stage.
- 6.39 The proposals will therefore provide an appropriate mix of housing in accordance with Policy BSC3, BSC4 and the NPPF.





Open Space

- 6.40 The open space to the west of the Site will be a green-blue corridor, incorporating the existing ponds, new planted SuDS, mature vegetation, recreational routes and habitats for wildlife. Additional recreational routes will be provided through this area and will link to the adjacent residential areas creating a cohesive and attractive pedestrian and cycle extension to the settlement.
- 6.41 Overlooked play areas, benefiting from natural surveillance from nearby dwellings, have been distributed throughout the Site and are easily accessible by all new and existing residents. These will take the form of formal, informal and incidental natural play areas with further opportunities for incidental play elsewhere in the development. A 400 sqm LEAP with a 20m buffer to proposed buildings is shown to the south of the northern parcel and a 100 sqm LAP with a 5m buffer to proposed dwellings is shown within a green focal space centrally located in the southern parcel.
- The standards set out in Policy BSC11 require 2.74ha of 'general green space' per 1,000 residents. This typology incorporates sub-typologies of parks and gardens; natural semi-natural green space; and amenity green space, all of which can be accommodated within the Site based on the proposals. Based on an average household size in Cherwell of 2.43 residents per household, the overall requirement for general green space is 1.53ha. The Open Space and Landscape Parameter Plan allows for over three times that amount, and will be useable for existing / future residents and should be seen as a key benefit.
- 6.43 The Illustrative Layout shows how the site could be brought forward in a way that protects the existing natural features of importance and creates a landscape led development for the benefit of proposed and existing nearby residents. A final layout will be presented as part of a reserved matters application that will include an appropriate scale of open space, play space and recreation routes.
- 6.44 As set out in the Heads of Terms, the Applicant is willing to agree an appropriate contribution (subject to CIL justification) towards outdoor sports provision.
- The proposals therefore accord with Local Plan Part 1 Policy BSC10 and BSC11 and MCNP Policies PD5 and PH3 and PH5.

Landscape and Visual Impact

- 6.46 The application is supported by a Landscape and Visual Impact Assessment (LVIA) prepared by Tyler Grange which is to be read alongside the Landscape and Visual chapter of the Environmental Statement (ES).
- 6.47 The LVIA confirms the site is not the subject of any statutory landscape designation which indicates that it is part of a valued landscape as described within footnote 7 of the NPPF. In order to determine whether the landscape of the site and its immediate surroundings are valued, the GLVIA3 and LI TGN 02/21 approach has been adopted within the LVIA. The assessment concludes that the site is considered to have a medium/low landscape value overall.
- 6.48 The nature of the development proposed is not uncharacteristic within the receiving landscape given its relationship with, and its position on the edge of, the settlement and adjacent to the former RAF airbase. The ES concludes that there will be no major landscape and visual effects





arising as a result of the proposed development when considered in combination with other planned and under construction development schemes in the wider area.

- 6.49 The proposals are in line with CDC's published landscape assessments which identify the site within the reconstruction landscape category which has a high capacity to accommodate change. The development would not result in the loss of any rare or unique features and affects only a very limited geographical area. The perception or distinctiveness of the wider Landscape Character Areas would not be altered following the development of the site. The most noticeable visual effects will be experienced by those people walking along public bridleways in middle distant views east of the site and local residents.
- 6.50 The Design and Access Statement confirms that building heights are limited to three storeys and the highest buildings are proposed to be centrally located within the southernmost parcel. This area of the site is the least visually sensitive and the LVIA recognises that additional boundary planting and creating an appropriate mass, pattern and grain of development as well as the use of appropriate materials will suitably mitigate any landscape impacts.
- 6.51 The proposed development therefore accords with Local Plan Part 1 Policy ESD13 and the NPPF.

Highways and Access

- The application is supported by a Transport Assessment (TA) and Travel Plan (TP) prepared by Hub Transport Planning which is to be read alongside the Transport chapter of the ES.
- 6.53 The TA has considered the traffic implications of a scheme for 250 dwellings to allow for potential changes to the future housing density/mix at reserved matters stage.
- 6.54 The TA confirms that the site is sustainably located in terms of access to facilities within Heyford Park and those planned developments, as part of the Heyford Park SUE, will expand on the amenities, employment opportunities and facilities already available.
- 6.55 The site is sustainably located within proximity to bus stops on Camp Road which provide regular services to Bicester and Oxford. Heyford rail station is also accessible to the site and provides links to Oxford and Banbury, from where links to cities further afield can be reached.
- 6.56 Safe and suitable access to the site will be provided via a new priority T-junction with Camp Road. Visibility splays are available in line with relevant design guidance to both the east and west of the proposed access junction. The development is forecast to generate up to 150 two-way vehicle trips during peak hours and this equates to an additional two to three vehicles on the local highway network every minute. Hub Transport Planning have undertaken capacity analysis and confirmed that the proposals will not have a material impact on the local highway network and will have a negligible impact on junction 10 of the M40 to the northeast of the site. The impact of traffic from the proposed development has been assessed using the Bicester SATURN model, as agreed with Oxfordshire County Council.
- 6.57 Pedestrian and cycle access links will be provided at a number of places along Chilgrove Drive and at either end of the southern boundary on Camp Road to ensure permeability across the site the main vehicle access point.
- 6.58 A Travel Plan has also been prepared which sets out several measures and initiatives to build upon existing active and sustainable travel opportunities in the area. Additional initiatives are





also proposed including electric vehicle charging provision in order to further promote sustainable travel to and from the site. This has assessed the current levels of accessibility in the local area and identified key benefits and opportunities to improve the facilities for pedestrians and cyclists for both future residents as well as those within neighbouring schemes. Key opportunities include; joining the Bicycle User Group that has been proposed for the wider Heyford Park SUE and offers cycling proficiency assistance and bike repairs and the implementation of personalised travel planning which goes beyond the issuing of travel packs by including face-to-face meetings to discuss the sustainable travel options available to new residents.

- 6.59 The ES confirms that appropriate embedded mitigation has been incorporated into the scheme and that the cumulative effects on transport and highway capacity during construction and operation is negligible.
- The proposed development therefore accords with the requirements of transport related planning policies, including Local Plan Part 1 Policy INF1 and SLE4 and MCNP Policies PD5 and PH5 and the NPPF.

Flood Risk, Drainage and Utilities

- 6.61 The application is supported by a Flood Risk Assessment (FRA) and Sustainable Drainage Strategy; both documents are prepared by BWB and should be read alongside the Water Resources ES chapter.
- 6.62 The FRA confirms that the site is located entirely within Flood Zone 1.
- Gallos Brook, the watercourse within the Site is excluded from the Flood Zone mapping as the catchment area is smaller than 3 sq km. Flood level analysis has been estimated for a suite of return periods including the 1 in 100-year +15%CC design event. The proposed development is shown to be located outside of the 1 in 100-year +15%CC extent, which is largely predicted to remain in-channel albeit there is some localised surface water ponding predicted. The Site is also identified as being at a low susceptibility to ground water flooding (<25%)
- 6.64 It is recommended that the finished floor levels of any buildings should be raised to a minimum of 150mm above the surrounding ground level to mitigate any residual risk of fluvial or groundwater flooding.
- 6.65 The Oxford Canal is 2.5km west and 42m below the Site and has therefore been assessed as a low risk source of flooding.
- Attenuation of surface water runoff will be provided through SuDS detention basins with capacity for the 1 in 100-year storm +40%CC. Runoff is to be managed by a combination of infiltration (where viable) and restricted discharge methods at the south of the site. The restriction in the southern catchment will limit discharge rates to the Gallos Brook at no greater than 2.3 l/s/ha. Foul water is proposed to be drained separately. Suggested mitigation in the ES includes early engagement with Thames Water to ensure there is sufficient capacity within the infrastructure to accommodate the development when considering the cumulative effects of other developments in the area. The ES concludes that post-mitigation, the residual effect of the proposed development is considered to be negligible and the impact of the development in the area will not be significant.





- 6.67 The Flood Risk Assessment confirms that the development will not increase flood risk to the wider catchment area subject to suitable management of surface water runoff discharging from the site.
- 6.68 The proposed development will therefore be in conformity with Local Plan Part 1 Policy ESD6, ESD7 and the NPPF.

Ecology

- An Ecological Impact Assessment (EIA) and Biodiversity Net Gain Metric has been prepared by RammSanderson and are submitted with this application. The EIA should be read alongside the Ecology chapter of the ES.
- 6.70 The EIA confirms that the Site is formed principally of ephemeral vegetation, grassland, woodland, scrub, standing water, intact species-poor hedgerow, intact species poor with trees, dry and wet ditches, running water, buildings and bare ground.
- 6.71 The EIA confirms the proposals are anticipated to have no significant impacts upon designated sites in the surrounding area, including the Bestmoor SSSI and Ardley Cutting and Quarry SSSI which are within 5km. The stream onsite is a Habitat of Principle Importance as it is connected to known breeding ponds for great crested newt.
- 6.72 The EIA confirms that 4 ponds are located on site and a further pond is off-site and within 500m of the site boundary. Surveys conducted in 2021 suggest the presence of Great Crested Newts at one of the ponds on site. The ponds are to be retained on site as three on site ponds are considered 'excellent' and the final on-site pond is considered 'good' within the HSI assessment. The surrounding habitats are suitable for terrestrial phase GCN's and will be retained and enhanced; a district GCN licence is recommended prior to commencement of works. The ES confirms that this mitigation strategy for GCN's will result in a positive significant effect.
- 6.73 The EIA confirms that there were records of bat and red kite (a Schedule 1 species) during the 2021 site survey. Proposed mitigation includes retention of two trees with bat roosting potential (including during construction) and further assessment of the red kite activity in spring once detailed design is available. Mitigation measures have been suggested for the construction phase in respect of the red kite. A sensitive lighting strategy and habitat manipulation is suggested in respect of bat impact mitigation and the ES concludes that this will reduce the impacts to minor/negligible levels.
- 6.74 Impact on breeding birds was considered to be negligible and the site was considered to be of low value for reptiles and unsuitable for otters and white clawed crayfish. A water vole survey was conducted and there were no signs of the presence of water vole on site. A water vole precommencement survey is however recommended on the onsite stream.
- 6.75 Mitigation and habitat enhancement measures during construction are proposed in respect of hedgehog, common toad and terrestrial invertebrates.
- 6.76 Proposed enhancement measures include additional planting along the ecological corridor including native species, amenity grassland and wildflower meadows. The submitted BNG metric includes calculations based on the Illustrative Layout and results in a biodiversity net gain of 12.37% and a significant hedgerow net gain. The ES confirms that there is likely to be a significant





beneficial effect to biodiversity in the long-term during operation as a result of the additional habitat creation.

6.77 It is considered that the monitoring, mitigation and enhancement measures outlined within the EIA will ensure that the proposed development will be in conformity with Local Plan Part 1 Policy ESD10 and the NPPF.

Arboriculture

- The proposals outlined within this application have been informed by a Preliminary Arboricultural Impact Assessment (AIA) prepared by Tyler Grange.
- 6.79 The site does not fall within a Conservation Area or Ancient Woodland designation and no Tree Preservation Order's (TPO's) are located on or adjacent to the site.
- 6.80 Existing trees on this site form a key component of the site's overall green infrastructure along its boundaries. The trees in these areas comprise mature oaks both set within the field boundary hedgerows and within the open field, as well as willow spp., oak and alder scattered along the water bodies in the northeast corner.
- 6.81 The Illustrative Layout includes a scheme that requires minimal tree loss and has sensitively considered the existing tree cover in respect of incursions to the root protection areas and shading constraints.
- Tree loss is limited to three sections of hedgerow to facilitate the construction of the internal road network totalling 130.5 metres. These are Category C and therefore considered low value and can be easily replaced / compensated for as part of future soft landscaping proposals.
- 6.83 The opportunities for new tree planting as part of a residential development of a scale and nature as shown on the Illustrative Layout is expected to provide a net gain in tree cover given the limited amount of tree loss. An Arboricultural Method Statement is suggested to ensure trees are protected during the construction stage. This can be secured by a suitably worded planning condition.
- 6.84 The AIA concludes that the development is in accordance with Local Plan Part 1 Policy ESD13 and ESD17 and the NPPF.

Air Quality

- The application is supported by an Air Quality Assessment (AQA) prepared by BWB. This confirms that the site is not located within, or in the vicinity of, an Air Quality Management Area (AQMA).
- A detailed operational phase road traffic emissions assessment was undertaken to consider the impact of development-generated road traffic on local air quality at identified existing receptor locations. The modelling assessment was undertaken in accordance with Defra Local Air Quality Management Technical Guidance and Institute of Air Quality Management & Environmental Protection UK guidance. The development is not predicted to result in exceedances of the relevant air quality objectives and the impact of the development on local air quality was predicted to be 'negligible'.





- 6.87 The AQA recommends dust mitigation measures for during construction and, should these be implemented, considered effects to be 'not significant' in accordance with Institute of Air Quality Management guidance.
- The proposed development therefore accords with the requirements of the NPPF which relate to air quality as well as Local Plan Part 1 Policy ESD10.

Noise

- 6.89 The application is supported by a Noise Impact Assessment (NIA) prepared by BWB.
- 6.90 The NIA confirms that a baseline survey and noise modelling exercise was undertaken for the site. An assessment of external noise levels identified that the upper limit guideline value from BS 8233 is predicted to be achieved in all rear gardens as shown on the Illustrative Layout. It has also been demonstrated that appropriate internal noise levels can be achieved with the incorporation of standard double glazing and trickle ventilators. No further mitigation measures are considered necessary.
- 6.91 Based on the results of the assessment, it has been demonstrated that the site is suitable for residential development and therefore accords with the requirements of the NPPF which relate to noise.

Heritage and Archaeology

- 6.92 A Built Heritage Statement (BHS) and an Archaeological Desk-based Assessment (ADA) have been prepared by RPS Group to support the application. These documents should be read alongside the Cultural Heritage and Archaeology chapter of the ES. The Assessments consider the significance of recorded heritage assets within a 1 km radius of the Site boundary, together with an assessment of any potential impacts.
- 6.93 The BHS confirms there are no designated or non-designated built heritage assets located within the site and has identified 4 Listed Buildings, a Conservation Area, a Scheduled Monument and 61 non-designated built heritage assets located within a 1km search radius surrounding the site.
- 6.94 All of the designated and non-designated heritage assets relate to elements of the former RAF Upper Heyford airbase, which is located immediately to the north and north-west of the site. The entire airbase is covered by the RAF Upper Heyford Conservation Area.
- 6.95 The assessment has established that only the RAF Upper Heyford Conservation Area and 3 Hardened Aircraft Hangers (non-designated assets) located to the north of the site have the potential to be affected by the proposed development through changes within their settings. The development will result in a small visual change within their settings, but this will be seen within the context of nearby residential areas and will not compete or change the visual and spatial relationships found within the formal extent of the airbase. The BHS concludes that the proposals will result in no harm to the significance of the RAF Upper Heyford Conservation Area and non-designated built heritage assets within it.
- 6.96 The ADA confirms that there are no designated archaeological assets within the Site, and there will be no impact on any designated archaeological assets within the wider area. A geophysical survey has been undertaken to assess the archaeological potential of the site which identified possible archaeological features in the form of undated boundaries and enclosures, and evidence





for ridge and furrow cultivation. It is concluded that there is a low potential for the site to contain any significant remains that have not been identified by the geophysical survey.

- 6.97 The ES concludes that there will be no significant cumulative effects associated with the proposed development on either built heritage or archaeology receptors.
- 6.98 The BHA and ADA conclude that the development is in accordance with Local Plan Part 1 Policy ESD10 and the NPPF.

Agricultural Land Quality

- 6.99 An Agricultural Land Classification report is submitted with the application and confirms that 75% of the site (9ha) is of agricultural grade 3b and the remaining 25% (3ha) is classed as non-agricultural land.
- 6.100 Agricultural grade 3b is considered moderate quality agricultural land and not within the definition of Best and Most Versatile agricultural land as set out in Annex 2 of the NPPF. The majority of the district constitutes moderate or high-quality agricultural land and given that CDC are unable to demonstrate a 5 year housing land supply, the loss of some greenfield sites in this area is inevitable.

Ground Conditions

- 6.101 A Phase 1 Geo-Environmental Assessment (GEA) has been prepared by BWB to support the application.
- 6.102 Limited potential sources of contamination have been identified on site. The potential for Made Ground giving rise to hazardous ground gases may be present within the area of landscape to the west or by the northern boundary. A detailed UXO risk assessment report and further ground investigation is required at a later reserved maters stage to establish mitigation measures for intrusive works and to establish the ground conditions and inform the foundation and pavement design.
- 6.103 The GEA concludes that the development is in accordance with Local Plan Part 1 Policy ESD15, Saved Policy ENV12 and the NPPF.

Sustainability

- 6.104 This section of the Statement comprises the Sustainability Statement and explains how the proposals can reduce both energy demand and CO2 emissions. It includes an assessment of renewable energy generation as well measures to reduce energy demand and CO2 emissions through passive design measures and a 'fabric first' approach.
- 6.105 The proposed development will adopt the use of an "energy hierarchy" and a holistic approach to sustainability to meet national best practice guidance and CDC's objectives for sustainable design and construction. The energy hierarchy is as follows:
 - Reducing energy use through a fabric and passive design measure
 - Providing energy efficient building services
 - Producing on-site low carbon renewable energy





- 6.106 Proposed measures that have been incorporated into the structure of the Illustrative Layout and could be included at reserved matters stage are as follows:
 - Passive Solar Design: The shape and orientation of the site allows for homes to be delivered that incorporate passive solar design techniques.
 - Materials: a 'fabric first' approach to the development can be secured. This approach to sustainability ensures there is limited maintenance/replacement costs to the occupier and the carbon savings are secured for the lifetime of the building.
 - Thermal energy: the design of new buildings can aim to reduce thermal energy demand by providing improved insulation and minimise air leakage where possible.
 - Energy efficiency: the proposals can reduce energy consumption by including high energy efficiency lighting and heating systems.
 - Buildings for Life (BFL): The Proposed Development will implement the Building for Healthy Life assessment, aiming to achieve a 'green' score.
 - Sustainable Transport: The site is in close proximity to open space and a sports facility and also has good connectivity to local public transportation infrastructure, as well as existing and planned services and facilities. The proposals ensure that the principles of the sustainable transport hierarchy are met by prioritising walking, cycling and public transport ahead of cars.
 - Travel Plan: The application is accompanied by a Travel Plan which includes proposed measures to reduce the reliance on private vehicles and promote walking, cycling and public transport. A personalised Travel Pack will be offered to every household and there is a commitment to join the Heyford Park Bicycle User Group.
 - Electric Vehicle Chargers: These will be provided for each dwelling ensuring each property
 is able to make the switch to Electric Vehicles.
 - Water use: The development will align with the latest building regulations of 125 litres per day.
 - Electric heating: The development will utilise electric heating in all properties on the development, further reducing carbon emissions of dwellings.
 - Waste management: appropriate waste management facilities, including dedicated storage areas for recyclable and non-recyclable waste, will be provided to each dwelling. A Construction Environmental Management Plan will identify methods of reducing waste during the construction phase.
 - Biodiversity: The proposals aim to support and enhance the local environment and provide a net gain in biodiversity across the site by including measures to mitigate the impact of the development and enhance the site's biodiversity net gain. Measures proposed include significant habitat improvements to the 'wet corridor' on the eastern edge of the Site which includes the retention and enhancement of the habitats around the ponds, introducing planting buffer zones and enhancement to the hedgerows forming the sites boundary





features. Wherever possible the scheme will include the retention and protection of identified existing habitats such as trees and hedgerows.

- Pollution: The application is submitted with technical assessments in respect of air quality, noise and flood risk that demonstrate the proposed development, during construction or operation, will not have any unacceptable impact on the surrounding area, nor will proposed residents be unacceptably impacted by existing pollutants.
- 6.107 The proposals thereby comply with Polices ESD3 and the NPPF.

Summary

- 6.108 In the light of the above, it is clear that the development proposals accord with all parts of the development plan that are up to date. Where a conflict with Policy H18 arises, this should be considered to be out date and afforded less weight by way of the fact that CDC cannot evidence a five year supply of deliverable housing sites, as required by Paragraph 74 of the NPPF. In accordance with paragraph 11d of the NPPF, the tilted balance should therefore be engaged, and planning permission granted unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.
- 6.109 The technical assessment highlighted above has demonstrated that the development proposals are sustainable, and there are no adverse impacts that outweigh the significant benefits of the scheme.





7. AFFORDABLE HOUSING STATEMENT

Development Plan Policy

- 7.1 Policy BSC3 of the Local Plan Part 1 relates to the provision of affordable housing in CDC and confirms that within the area of the application site, residential developments of 11 or more dwellings will be required to provide at least 35% affordable housing on site. Of this, 70% will be expected to be affordable/social rented and 30% intermediate affordable homes.
- 7.2 The latest version of the Oxfordshire SHMA was published in 2014, and pre-dates the Local Plan Part 1. As shown on the table below, the evidence identified a clear need for one, two and three bed affordable units, rather than larger dwellings.

Table 7.1: Oxfordshire SHMA (2014) affordable dwelling requirement for Cherwell

	1 Bed	2 Bed	3 Bed	4+ Bed
Affordable	28.3%	31%	36.9%	3.7%

Proposed Affordable Housing Provision

- 7.3 In accordance with adopted Policy BSC3 and the Oxfordshire SHMA, the application proposals make provision for 35% onsite affordable housing. Whilst the current application is made in outline the Illustrative Layout has been designed to broadly accommodate the mix and tenure split suggested within the SHMA. This is shown in Table 4.1 within this Report. The tenure split of the affordable dwellings will be agreed with CDC during the course of the application and the final mix of affordable housing will be determined at Reserved Matters stage, reflective of the most up-to-date identified needs within CDC.
- 7.4 The application proposals in respect of affordable housing provision comply with the relevant adopted policies and other material planning considerations. The provision of affordable housing is a clear benefit of the proposed development and should be afforded significant weight. It is proposed that the on-site affordable housing provision can be secured by way of a Section 106 legal agreement.





8. ECONOMIC BENEFITS STATEMENT

- 8.1 At the heart of the NPPF is the aim of achieving sustainable development and identifies three overarching objectives which are interdependent and need to be pursued in mutually supportive ways so that net gains can be secured.
- 8.2 In defining the 'economic' objective 14, the planning system is required 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."
- 8.3 The 'social' objective¹⁵ is required to:
 - "... 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 a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being."
- 8.4 The economic and social benefits of development are therefore confirmed in the NNPF as a key dimension to achieving sustainable development. Paragraphs 7 to 223 set out the government's approach to delivering sustainable development through the planning system. Paragraph 81 states that:
 - "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."
- 8.5 In decision-making, significant weight should therefore be given to the economic and social benefits of development and this is twinned with the need to boost the supply of housing. Locally, within CDC there is the aspiration to improve the performance of the economy in line with the wider region to help achieve economic growth as well as meet housing needs and maintain a five year housing land supply.
- The key economic benefits of development which promote sustainability can be broken down into two principal phases:
 - Construction phase: job creation direct and indirect
 - Operational phase: economic expenditure of new residents and extra revenue raised for the local authority through taxation.
- 8.7 There are of course wider benefits of meeting the housing needs in CDC.

15 Paragraph 8b, NPPF

¹⁴ Paragraph 8a, NPPF





- 8.8 The development will comprise up to 230 homes and 35% will be affordable. It is anticipated that whilst development could commence within 2 years (subject to planning), anticipated delivery at 50dpa from the middle of 2024 from two outlets would equate to around five years in the current market and contribute around 150 dwellings to the five year supply. The general benefits of the development including the estimated value of potential economic outputs is as follows:
 - Contribution to the delivery of housing at a local level The development would assist CDC in alleviating low delivery rates.
 - Improvements in housing mix and choice The proposed development will provide a balanced mix of dwellings, providing a choice of type and size, with an emphasis on improving the quality and quantum of family, affordable and housing for older persons in Cherwell, in line with the aims of the development plan.
 - Development in a sustainable location The development is within close proximity to local shops and services as well as numerous residential developments in various stages of planning or construction which will deliver a range of facilities including a local centre as well as education facilities.
 - Estimated construction spend The development of up to 230 new homes will generate a construction spend which totals approximately £31 million¹⁶.
 - Creation of direct employment opportunities The construction phase of the development will directly create around 264 Full Time Equivalent jobs for the estimated five year build out. This is calculated by taking the proportion of the total anticipated construction cost of the 230 homes (as shown above) which comprises labour (28% across the UK at 2011 prices) and dividing by the average gross pay per employee in the construction industry (plus £3,000 to account for overheads per employee): £32,832 (in 2018). At a build-out rate taking five years to complete the proposed development, this equates to approximately 53 jobs per annum.
 - Creation of indirect employment opportunities The impacts of development will extend beyond construction employment to include indirect benefits for the local and national economy including sectors such as manufacturing, real estate, business services, mining and quarrying and transportation. The Office of National Statistics estimates the direct and indirect construction output multiplier at 2.09, which equates to 288 indirect jobs. At a build-out rate taking five years to complete the proposed development, this equates to approximately 58 jobs per annum.
 - Investment in the local area The 'Annual Business Survey' (2011) of the Office for National Statistics establishes that the Gross Value Added in the construction of buildings averages 35.2% of turnover in the South East region. Therefore, the regional construction industry generates an average GVA of £44,071 per person. By multiplying this by the net additional employment impact of the scheme (552 jobs) it is possible to estimate that the scheme will deliver approximately an additional £24,327,192 of direct GVA over the build period.
 - **Economically active residents** The delivery of up to 230 homes is likely to be home to a total of 559 new residents, based on the average household size of 2.43 in line with the 2018

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¹⁶ Jewson's Build Cost Calculator (2021)





population projections for CDC. Assuming that 61.3% of the population is of working age (corresponding with nomis official labour market statistics 2019 for Authority) **the delivery of 230 homes could result in an additional 343 people of working age residing in Cherwell**. Of these people, given an economically active rate of 87.1% in those aged 16 and over in Authority¹⁷, at least 298 could be expected to be economically active and in employment.

- Local Spending Increase By reviewing the Output Area Classification (OAC) of the local area and applying the weekly household expenditure rates, it is possible to quantify the anticipated level of spending that would occur following the completion of the development. The OAC uses 60 variables to break the UK down into 8 'supergroups', profiling populations, structures, and other key results from 2011 UK census data to categorise the character of local areas. The application site falls into 'Urbanites' (OAC supergroup 5). Given that 35% of the dwellings will be affordable and the remainder of the site will comprise market housing, applying these same proportions indicates that the development should support £6,970,236 of spending annually following completion of the development. Whilst this figure expresses average household expenditure across the UK, a more accurate picture can be obtained by applying a weighting according to regional circumstances. The Office for National Statistics' 'Family Spending Survey' presents household expenditure by UK countries and regions 2019 - 2020. Using these figures, it is possible for spending disparities between each region to be expressed as a percentage of UK average household expenditure. This allows a weighting to be applied to the above figure. For the South East region, this amounts to 119%, meaning that residents of the proposed development (after weighting appropriate to the region) could be expected to generate total gross expenditure of £8,292,677 per annum.
- Increase in revenue for CDC The development of 230 homes has the potential to generate approximately £460,000 Council Tax per annum, pro-rata (using the Band D rate for 2021-22). This could provide an important source of revenue funding for the local authority in delivering services as well as investing in the locality. The development will also generate a New Homes Bonus Payment of over £1,114,000.
- Section 106 Contributions As highlighted in this Report the development will be dependent
 on payment of financial contributions to local facilities such as schools, parks and sports
 pitches.

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¹⁷ Nomis Local Authority Profile: https://www.nomisweb.co.uk/reports/lmp/la/contents.aspx





9. DRAFT HEADS OF TERMS

- 9.1 The applicant will enter into constructive dialogue with CDC in order to agree a Section 106 Agreement for any obligations which, in accordance with the CIL Regulations (2010) (as amended) are necessary, directly related to the development and fairly related in scale and kind to the development.
- 9.2 The following initial Heads of Terms are suggested:

Affordable Housing

i. Provision of 35% affordable housing with a tenure split to be agreed with CDC.

Open Space

- i. Provision of onsite informal open space and children's play area.
- ii. Phasing triggers will be agreed with CDC as well as an appropriate scheme for the long term maintenance and management, including any off-site commuted sums as applicable.
- iii. Contribution to off-site outdoor sports facilities, as necessary.

Education

i. Contributions towards the creation of primary and secondary school places, as necessary.

Highways and Transportation

i. The applicant is prepared to contribute a fair share towards wider highways and transport improvements in association with the wider masterplan objectives being progressed by Dorchester, on a pro-rata basis.

Other

i. Other contributions have been identified through pre-application discussions and subject to meeting the appropriate tests.





10. CONCLUSION

- 10.1 This Planning Statement has been prepared in support of an outline application for up to 230 dwellings (Use Class C3) with all other matters reserved except for access. The application is submitted on behalf of Richborough Estates and Lone Star Land.
- 10.2 It is the intention to deliver housing quickly on the site with the potential for well over one hundred dwellings to be completed within the five year monitoring period.
- 10.3 The design concept outlined in the Design and Access Statement, alongside the submitted Parameter Plans would secure a high-quality development.
- 10.4 The development of the site would be both suitable and sustainable.

Case for Development

- 10.5 The decision-making framework is established by the NPPF and Section 38 (6) of the Planning and Compulsory Purchase Act 2004. This confirms that if regard is to be had to the Development Plan for the purpose of any determination to be made under the planning Acts, the determination must be made in accordance with the Development Plan unless material considerations indicate otherwise.
- 10.6 It has been demonstrated that the proposals are largely compliant with the development plan, save for a conflict with saved Policy H18 of the Cherwell Local Plan 1996. The weight to be given to that policy conflict within the overall planning balance must, however, be considered in context of the current shortfall in housing land supply and the more recent adoption of Policy Villages 5 in this location, adjoining the application site.
- 10.7 Given the Council's acknowledged housing supply position, the most important policies for determining the application must be considered out-of-date under paragraph 11d of the Framework. Accordingly, the 'tilted balance' is engaged and planning permission should be granted unless either 11d(i) or 11d(ii) apply. In this instance, the application site is not subject to any policies that protect areas or assets of particular importance, so 11d(i) is not applicable. Therefore, the application falls to be considered against 11d(ii) and whether any adverse impacts of granting planning permission would significantly and demonstrably outweigh the benefits, when assessed against the policies of the Framework, taken as a whole.

Harm

- 10.8 As with any residential development located on a green field, new housing will introduce changes to the character of the site itself and its immediate surroundings. This change must, however, be considered in context of the Policy Villages 5 and the delivery of a new settlement at the former RAF Upper Heyford, a key strategic objective of the adopted development plan, on land adjoining the application site. Furthermore, the submitted LVIA demonstrates that the scheme can be delivered without unacceptable wider landscape and visual impacts.
- 10.9 In addition, the extent of any conflict identified with the development plan is narrow and limited to Policy H18 which seeks to restrict development beyond settlement limits. However, this policy is considered out of date and should be afforded limited weight due to CDC's failure to meet local housing needs or evidence that the necessary level of housing will be delivered in the future.





10.10 Any other potential impacts would be mitigated by way of suitably worded planning conditions or secured by Planning Obligation.

Benefits

- 10.11 By comparison, and subject to planning permission being granted, there are numerous benefits which would arise from the proposed development. These benefits are established and quantified throughout this Statement and can be summarised as:
 - The provision of up to 230 new high quality market houses in a sustainable location, that will round off the Heyford Park settlement as established by Policy Villages 5, in a location where there is an acknowledged and serious shortfall in housing land supply.
 - The provision of up to 77 affordable dwellings in an area where there is unmet need and worsening affordability.
 - accessible formal/informal open space and play space for use by new and existing residents with its long-term management secured. The level of open space to be provided is likely to exceed the policy requirement;
 - The ecology on site will be improved through the provision of new green infrastructure which will achieve a net gain in biodiversity – the Illustrative Layout confirms that a minimum of 10% BNG can be achieved;
 - The retention and enhancement of existing ecological habitats including the creation of a 'wet corridor' that retains the ponds and creates a high quality public recreational area.
 - The development will improve connectivity and access to PRoWs;
 - Creation of employment opportunities through the construction phase of the development;
 - The proposed development will significantly increase the number of economically active residents, boosting income and local expenditure and supporting local services and facilities within Heyford Park;
 - Increase in revenue for CDC through the New Homes Bonus and increased Council Tax receipts.

Balance

- 10.12 In light of the foregoing, it has been demonstrated that any limited or technical conflict with the Development Plan would be comfortably outweighed by other material considerations, specifically the significant social, economic and environment benefits that would be secured by the proposed development. Therefore, a determination other than in accordance with the Development Plan would be fully justified in this instance.
- 10.13 Moreover, it has also been demonstrated that, in accordance with Paragraph 11d(ii) of the NPPF, the most important policies for the supply of housing in Cherwell are out-of-date and therefore, the presumption in favour of sustainable development i.e. the 'tilted balanced' is engaged. In that context, the case for granting planning permission is even more emphatic; any adverse





impacts of the proposals would be comprehensively outweighed by the benefits, when assessed against the Framework as a whole.

Moreover, there are no technical or environmental constraints that would preclude the development of this site, subject to planning conditions and/or obligations. The proposal broadly complies with the spatial strategy, housing policies and relevant 'development management' policies of the development plan. As set out above, subject to planning permission being granted, there are numerous benefits arising from the proposed development.

10.14 It is clear that the proposals represent sustainable development which will make a positive difference, creating an appealing neighbourhood which respects its context and caters for identified needs. Taking the above into consideration, there is a compelling case for the granting of planning permission at the earliest opportunity.





Appendix 1: LIST OF SUBMISSION DOCUMENTS

The application comprises the following documents:

- Location Plan (ref: 374_L01)
- Land Use Parameter Plan (ref: 374_P01)
- Access and Movement Parameter Plan (ref: 374_P02)
- Building Heights Parameter Plan (ref: 374_P03)
- Density Parameter Plan (ref: 374_P04)
- Landscape and Open Space Parameter Plan (ref: 374_P05
- Illustrative Layout (ref: 374_P06)
- Illustrative Layout (without annotations) (ref: 374_P06)
- Design and Access Statement
- Planning Statement (incorporating Affordable Housing Statement, Economic Benefits Statement, Sustainability Statement and Draft Heads of Terms)
- Environmental Statement Non-technical Summary
- Environmental Statement
- Statement of Community Involvement
- Transport Assessment
- Travel Plan
- Flood Risk Assessment
- Sustainable Drainage Strategy
- Ecological Impact Assessment
- Arboricultural Impact Assessment
- Noise Assessment
- Air Quality Assessment
- Phase 1 Geo-Environmental Assessment
- Geophysical Survey Report



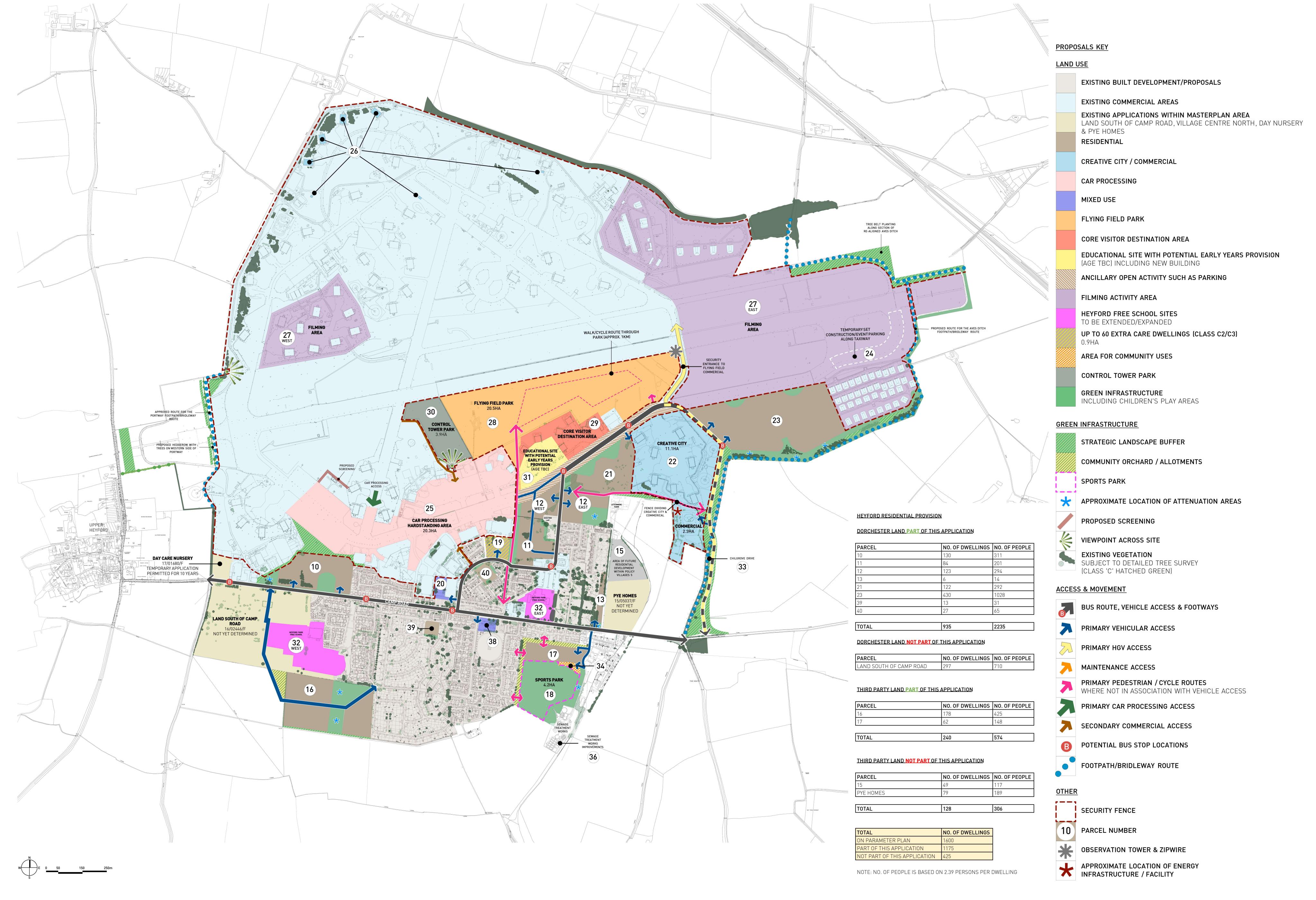


- Built Heritage Statement
- Archaeological Desk-based Assessment
- Landscape and Visual Impact Assessment
- Agricultural Land Classification Report



Appendix 2: COMPOSITE PARAMETER PLAN SUBMITTED WITH

APPLICATION 18/00825/HYBRID









Appendix 3: LPDF Research Paper – 'The Housing Emergency'

THE HOUSING EMERGENCY



In 2020, the average cost of buying a home was

times the average only **3.54**.

In 1997 it was

In November 2021 the average house price in the UK has exceeded

Saving £311 per month it would take 10 years to save for a 15% deposit on this amount.

If you started saving for a deposit 10 years ago, you will have found that the average house price in the UK has gone up by

£69,000 or 38% in the intervening time.

In 2019-20, the average age of a first-time buyer was

34 years old.

In 2007 the average age was 27, and in 1997 it was 26.

number of households

average rent has increased by

21.6%.

3.66m

the number of those in concealed or overcrowded houses in England.3



In total, 17.5 million people

(1 in 3 adults) are impacted by the housing emergency - living in overcrowded, dangerous, unstable or unaffordable housing.



1 in 5 adults

regard housing issues as negatively impacting their mental health.

Understanding the Problem

Are we in a housing emergency? The term 'housing crisis' has been banded around politically for a number of years, though recently, the charitable organisation Shelter have taken this further, identifying a national emergency. This has been qualified through their 2021 report⁴ which identifies that around 17.5 million in England (around 1/3 of the population) live in overcrowded, dangerous, unstable or unaffordable housing⁵. The consequences are real. As highlighted by Shelter following their 2017 survey⁶ around **1 in 5 adults regarded housing issues as having negatively impacted on their mental health** in the past five years, including long-term stress, anxiety and depression.

The housing emergency involves us all, from those who will struggle to get onto the first rung of the housing ladder, those in affordable housing need, or those in need of specialist care. For those millennials looking to enter the housing market, the problem is particularly acute. Saving a deposit remains far beyond the reach of many millennials or young savers.

Affordability heatmap, showing the extent to which regions in England exceed an affordability ratio of four (i.e. average house prices four times average income). 5.03 5.03 6.77 9.41

"Britain's broken housing market hurts all of us"

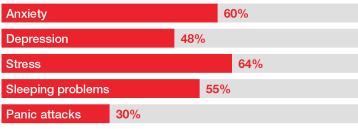
(MHCLG – Fixing the Broken Housing Market 2017)



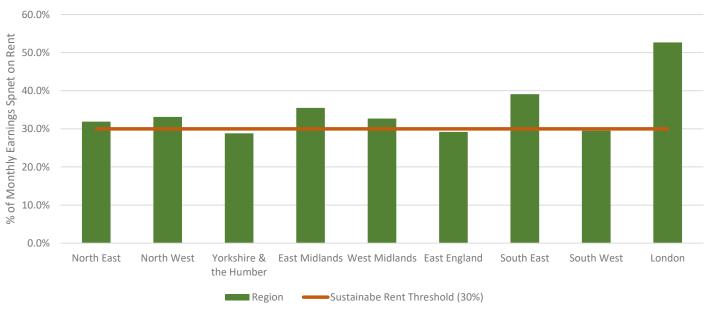
"17.5 million people are trapped by the housing emergency"

(Shelter - Denied the right to a safe home, 2021)

Adults in England who have had mental health problems due to housing pressures



Percentage of all English adults who have had a housing problem (in the last 5 years), who said that it contributed to mental health issues



Lower Quartile rent as a proportion of monthly earnings, by Region 2020. (Source ONS 2021)

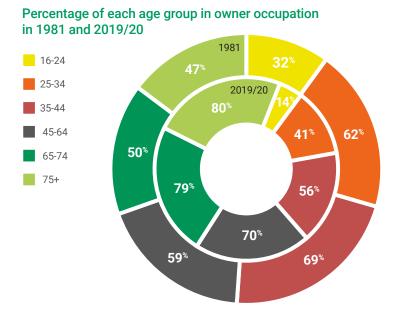
During the last 11 years, the number of households renting has increased by 24% and during this period, the mean rent has increased by 46%. It is findings such as this which explain why the average age of the **first time buyer** continues to rise, and in 2019/20 stands at **34 years old**.⁷

How Many Homes do we Need?

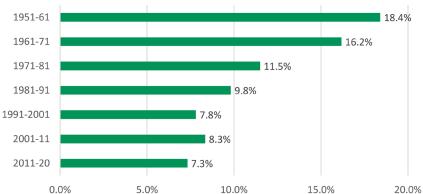
The understanding of need is clearly not straight forward, and there are various ways in which the national requirement can be considered. What is perhaps less up for debate is the historic shortfall in housing, since the post war period up to the end of the 1970's. As indicated in the timeline below, in 2020, we saw the highest increase in the dwelling stock since 1987. An additional 243,770 homes, including the new builds highlighted below and conversions. However when stock change is considered over 10 year periods, it is clear that we are experiencing the lowest growth period in the last 70 years.

The Government has set out a clear ambition to use the planning system to significantly boost the supply of new housing. The Government understands that achieving an ambitious scale of housebuilding is important not only to meet future need, but to address chronic backlog of housing need which has been one of the causes of spiralling unaffordability.

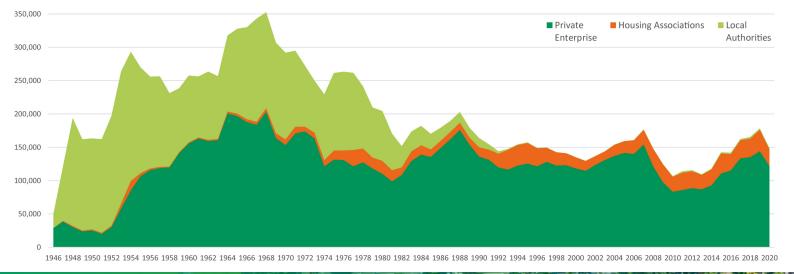
Sources, including the research of Heriot-Watt University, indicate that housing need may be in the region of **340,000 per annum**. Both the Heriot-Watt research and the Government are in unison on the position that this is not a matter for future Governments to address, and needs to be tackled now if there is any hope of abating the emergency.







Housebuilding rates since the 1940s (new-build completions), broken down by the source of supply



As we recover from the pandemic, demand for housing continues to outstrip supply. Buyer demand is

35% higher than the average for the past 5 years

(Source: Zoopla)

Is it just about upscaling?

Significantly boosting the supply of housing is one of the most important contributions that the planning system can make. It is not the only issue however. Rising housing costs coupled with a lack of regulation in the rented sector have placed many in unsafe, overcrowded homes that are not fit for purpose. There are many authorities who have identified a high local affordable housing need, but remain incapable of meeting that need, due to lack of available land or financial viability concerns. The Government recognise that boosting the supply beyond historical rates can increase the market share of affordable homes secured. Research from Heriot-Watt University in 2018 identified a need for **145,000 affordable homes** to be built every year up to 2031. In 2020, **only 58,644 affordable homes** were built, representing around **40% of the total need** identified in the study.⁸ This target will not be met without a commitment to boosting the supply of housing more generally. This would enable greater

The number of people aged over 75 living in inadequate accommodation increased by a third between 2012 and 2017.

The Good Home Inquiry (Good homes for all-A proposal to fix England's housing, September 2021)

amounts of affordable housing to be secured because affordable housing is typically required as a proportion of the total number of houses delivered on each individual housing development.

One of the challenges for the future will be to ensure that the needs of the growing elderly population can be met. The most recent projections for England indicate that the 65+ age group will increase from 18.8% in 2018 to 23.9% in 2040, an increase of over 4.5 million.⁹ This age group requires housing that meets their needs, and can give them the confidence to relocate, potentially releasing family housing back into the market.



What can we do?

planning system to address this problem. The LPDF sets out in its 'Agenda for Action' a number of ways in which planning permissions for new housing can be boosted. Bold vision and leadership is needed to deliver upon this aim, whilst ensuring that all growth contributes towards the delivery of community focussed development with a strong mandate for design.

¹Source: Nationwide 2021. | ²Source: House price to work place affordability ratios (ONS 2021). | ³Source: Everybody In - How to end homelessness in Great Britain (Crisis 2018). | ⁴Source: Shelter (2021) Denied the right to a safe home: exposing the housing emergency. | ⁵ Source: Shelter's research finds that 6% of respondents live in a home which harms their family's physical health, 23% are living in homes with significant damp, mould and condensation, and 7% report safety hazards such as faulty wiring, fire risks, or areas that could cause a fall. The report refers to unstable housing, stating that most private rentals are on tenancies of 6 to 12 months, and renters can be evicted for no reason because of Section 21, creating a permanent state of stress and instability. | ⁵ Source: Shelter (2017) The impact of housing problems on mental health. | ⁷ Source: English Housing Survey 2021. | § Source: ONS (2021). | § Source: ONS (2020).

This leaflet has been prepared jointly by RPS and the Land Promoters & Developers Federation (LPDF).



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