

Sustainability Appraisal (SA) of the Vale of White Horse District Local Plan 2031: Part 2

Adoption Statement

October 2019

REVISION SCHEDULE					
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1	Oct 2019	SA Statement published alongside the adopted version of the Vale of White Horse District Council Local Plan 2031 Part 2: Detailed Policies and Additional Sites (LPP2)	Mark Fessey Associate Director	Steve Smith Technical Director	Steve Smith Technical Director

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AECOM Infrastructure & Environment UK Limited
2 Leman Street, London E1 8FA

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1 INTRODUCTION

Background

- 1.1.1 Vale of White Horse District Council submitted the Local Plan 2031 Part 2: Detailed Policies and Additional Sites (LPP2) to the Secretary of State on 23 February 2018 for independent examination by an appointed Planning Inspector. The Planning Inspector issued his final report on LPP2 to the Council on 25 June 2019, finding that the Plan is 'Sound' subject to certain modifications. LPP2 was then adopted by Full Council on 9 October 2019.
- 1.1.2 A parallel process of Sustainability Appraisal (SA) was undertaken alongside plan-making. SA is a mechanism for considering and communicating the likely effects of an emerging plan, and reasonable alternatives, with a view avoiding negative impacts and maximising positives.
- 1.1.3 It is a requirement that SA involves a series of procedural steps. The final step in the SA process involves preparing a 'statement' at the time of plan adoption.
- 1.1.4 The aim of the SA Statement is to present:
- 1) The 'story' of plan-making / SA up to the point of adoption.
Specifically, there is requirement¹ to: *"summaris[e] how environmental considerations have been integrated into the plan....and how the environmental report... the opinions expressed... and the results of consultations... have been taken into account... and the reasons for choosing the plan... as adopted, in the light of the other reasonable alternatives dealt with."*
 - 2) Measures decided concerning the monitoring of plan implementation.
Specifically, there is a requirement to explain *"the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme."*

This SA Statement

- 1.1.5 This is the LPP2 SA Statement, and hence considers **(1)** and **(2)** in turn.
- 1.1.6 This Statement concludes by presenting a checklist of legal requirements, with a view to demonstrating the legal compliance of the SA process undertaken with the SEA Regulations.²

2 THE PLAN-MAKING / SA 'STORY'

2.1 Introduction

- 2.1.1 Key steps in the SA process were as follows:
- 1) An Interim SA Report was published alongside the Draft Plan in **March 2017**
 - 2) The SA Report was published alongside the Proposed Submission Plan in **Sept 2017**
 - 3) An SA Report Addendum was published alongside Proposed Modifications in **March 2019**
 - 4) The Inspector published his report in **June 2019**
- 2.1.2 Each step in the process is discussed, in turn, below. All SA documents are available at:
<http://www.whitehorsedc.gov.uk/services-and-advice/planning-and-building/planning-policy/local-plan-2031-part-2>

¹ The information to be provided in the Statement is listed in Article 9 of the SEA Directive and Regulation 16 of the SEA Regulations.

² Environmental Assessment of Plans and Programmes (SEA) Regulations 2004

2.2 Draft Plan / Interim SA Report (March 2017)

2.2.1 The Interim SA Report was structured in three parts in order to answer the following questions:

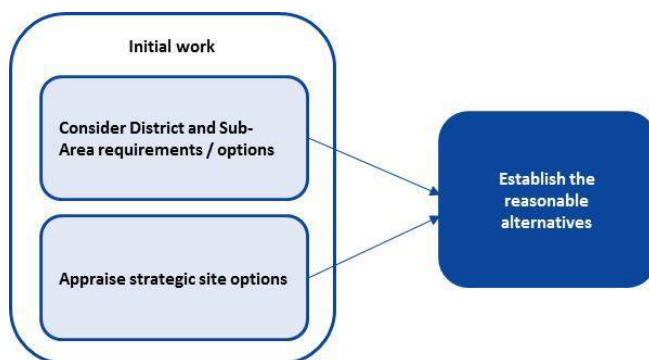
1. What has plan-making / SA involved **up to this point**?
 - Including in relation to 'reasonable alternatives'.
2. What are the SA findings **at this stage**?
 - i.e. in relation to the draft plan.
3. What happens **next**?

2.2.2 Each part of the Interim SA Report is considered in turn below, before a final sub-section discusses consultation responses received.

What has plan-making / SA involved up to this point?

2.2.3 The first task was to establish reasonable spatial strategy alternatives, which itself involved a series of procedural steps, as summarised in Figure 2.1.

Figure 2.1: Establishing reasonable alternatives (March 2017)



2.2.4 A key step in the process involved establishing and appraising a shortlist of strategic site options – see Figure 2.2. The appraisal of strategic site options was presented in Appendix III of the Interim SA Report.

2.2.5 Ultimately it was possible to establish four reasonable spatial strategy alternatives, i.e. alternative packages of sites for allocation, which were then subjected to appraisal – see Table 2.1 – with the appraisal findings fed-back to the Council in time to inform finalisation of the Draft Plan. The Council formally responded to the appraisal, setting out reasons for supporting the preferred spatial strategy option (Option 4) ahead of the three alternatives – see Box 2.1.

N.B. the appraisal was presented under the SA 'framework' established through a process of 'scoping', which included a dedicated consultation held in October 2016.

Figure 2.2: Strategic site options (March 2017)

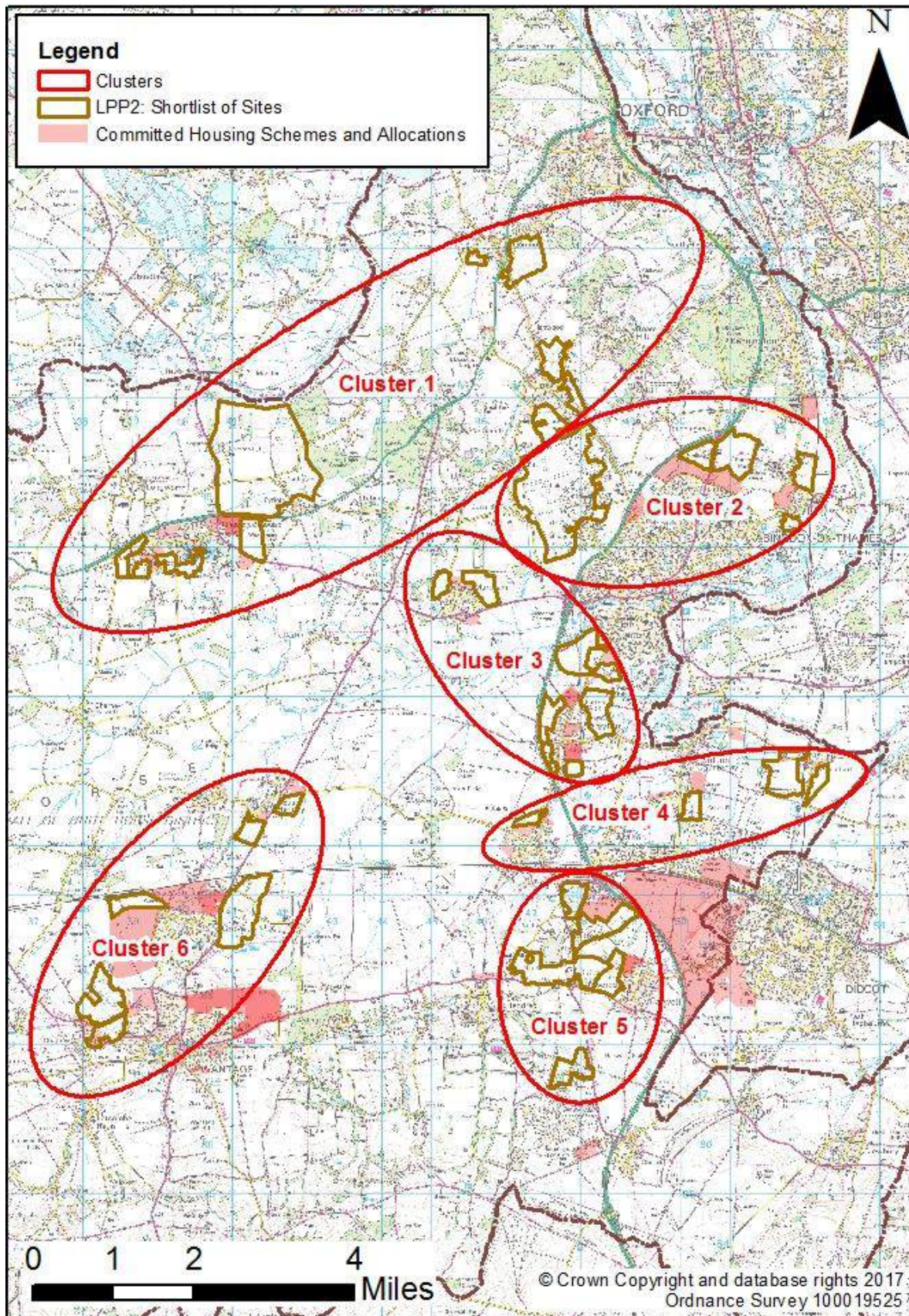


Table 2.1: Summary reasonable alternatives appraisal findings (March 2017)

Summary findings and conclusions				
Objective ³	Categorisation and rank			
	Option 1 Reliance on large sites	Option 2 Less reliance on large sites	Option 3 Least reliance on large sites	Option 4 The preferred option
Homes	3	3	★1	2
Services and facilities	★1	2	3	3
Movement	★1	4	★1	★1
Health	=	=	=	=
Inequality and exclusion	=	=	=	=
Economy	=	=	=	=
Natural environment	=	=	=	=
Heritage	★1	3	4	2
Landscape	★1	3	4	★1
Pollution	★1	2	2	2
Climate change mitigation	=	=	=	=
Climate change adaptation	=	=	=	=

Conclusions

The appraisal shows Option 1 to perform best in terms of the greatest number of objectives, primarily because it would involve concentrating growth at a small number of large sites.

Option 4 also performs well, and performs notably better than Option 1 in terms of 'housing', as it reflects the latest understanding of housing delivery potential at Dalton Barracks, and proposes some additional smaller sites that could deliver early in the plan period. However, Option 4 performs worse than Option 1 in terms of 'Pollution' (due to air quality concerns at Marcham) and also 'Services and facilities' (due to a school capacity constraint at Marcham).

Options 2 and 3 perform poorly in terms of a number of objectives, including 'Pollution' as development of the South of Abingdon site ahead of a new bypass road would worsen traffic congestion and air quality within Abingdon Town Centre. Option 3 would involve reliance on the most number of sites, which would have positive implications from a 'Housing' perspective, but negative implications in terms of: 'Landscape' (allocation at Rowstock being a key issue); 'Heritage' (issues would result from allocation at South of Abingdon, Cumnor and Wootton, plus high growth at Kingston Bagpuize); and 'Services/facilities' (issues would potentially result from high growth at Kingston Bagpuize, given distance to a GP facility). Option 3 is identified as preferable to Option 2 in terms of 'Movement' on the basis that Evaluation of Transport Impacts (ETI) work, and also because Option 2 assumes a focus of growth at Milton Heights, a location where there are infrastructure constraints.

³ A decision was made to 'split' landscape and heritage, i.e. give stand-alone consideration to each issue.

Box 2.1: The Council's response the appraisal of reasonable alternatives (March 2017)

"The proposal is to allocate sites through LPP2 to complement those set out in LPP1. The proposal is for the Local Plan 2031 (Parts 1 and 2) to 'fully' meet the objectively assessed need for housing arising from the Vale of White Horse district (20,560 homes) and from neighbouring authorities (2,200 homes) and deliver an additional 1,400 homes within the South East Vale Sub-Area in accordance with the 'spatial strategy' and support infrastructure delivery.

The proposed LPP2 allocations are fully consistent with the 'spatial strategy' set out in LPP1 and support the housing requirements identified for each of the three sub-areas in the Part 1 plan. The appraisal of alternative approaches to allocation presented above (Table 7.1) highlights that the proposed package of allocations performs well in a number of respects. Issues are highlighted in terms of 'access to services and facilities' (specifically primary school capacity), 'heritage' and pollution (specifically the matter of air quality), all of which are site specific issues that can be addressed through further work subsequent to consultation.

It is also noted that Option 1 performs well, in terms of a number of objectives, because it involves concentrating growth at a small number of larger sites. The Council will examine further the potential to rely on a small number of larger sites, although the benefits would need to be balanced with the need for a range of sites that deliver throughout the plan period."

What are the SA findings at this stage?

- 2.2.6 Part 2 of the Interim SA Report presented an appraisal of the Draft Plan under the SA framework, reaching the following conclusion:

"The appraisal finds the Draft Plan to perform well in terms of the majority of objectives, with 'significant positive effects' predicted in terms of 'Housing' (as objectively assessed housing needs should be met) and 'the Economy' (given the proposed high growth strategy within Science Vale). However, significant negative effects are predicted in terms of 'Pollution', given a risk that growth focused at Marcham would worsen traffic congestion within the designated Air Quality Management Area (AQMA). Issues or uncertainties are also highlighted in terms of 'Movement' (given a need for further evidence through Evaluation of Transport Impacts, ETI); 'Services and Facilities' (given a need to explore means of ensuring sufficient primary school capacity) and 'Landscape' / 'Biodiversity' (given several site specific issues that will need further work, including in relation to the avoidance/mitigation of AONB impacts at Harwell Campus)."

What happens next?

- 2.2.7 Part 3 of the Interim SA Report explained the subsequent process of consultation (under Regulation 18 of the Local Planning Regulations) and then preparation of the Proposed Submission Plan for publication (under Regulation 19).
- 2.2.8 It also presented 'measures envisaged concerning monitoring', in particular finding that: *"The appraisal of Draft LLP2 presented above serves to suggest that there might be a focus on monitoring indicators relating to air quality."*

Consultation

- 2.2.9 In total, 3,698 formal representations were received on the plan by 573 respondents. Representations received covered all aspects of the Plan, with a summary of key issues raised, in respect of each policy area covered by the plan, presented within Chapter 5 of the Council's 'Regulation 22 Consultation Statement'.⁴ The Consultation Statement also presents a discussion of representations made specifically on the Interim SA Report (see paragraph 5.460).

⁴ See www.whitehorsedc.gov.uk/services-and-advice/planning-and-building/planning-policy/local-plan-2031-part-2

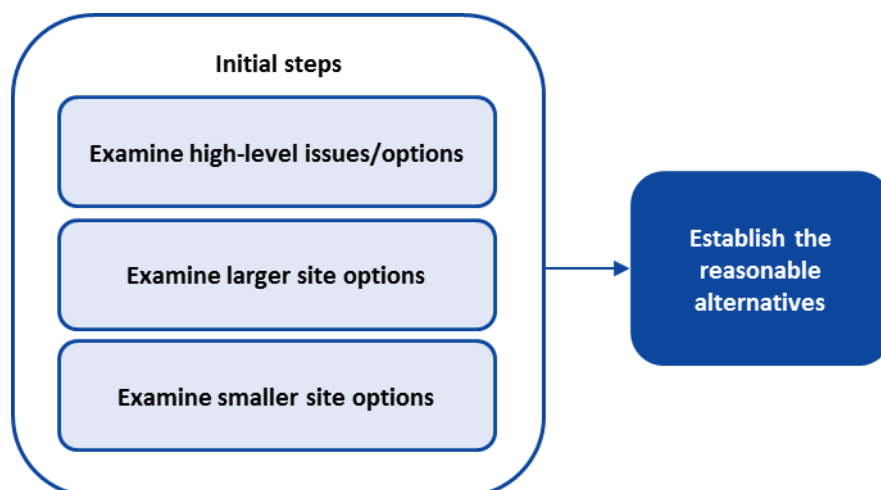
2.3 Proposed Submission Plan / SA Report (September 2017)

2.3.1 The SA Report was structured in three parts, as per the Interim SA Report. Each part of the Interim SA Report is considered in turn below, before a final sub-section discusses consultation responses received.

What has plan-making / SA involved up to this point?

2.3.2 The first task was to establish refined reasonable spatial strategy alternatives, which itself involved a series of procedural steps, as summarised in Figure 2.3.

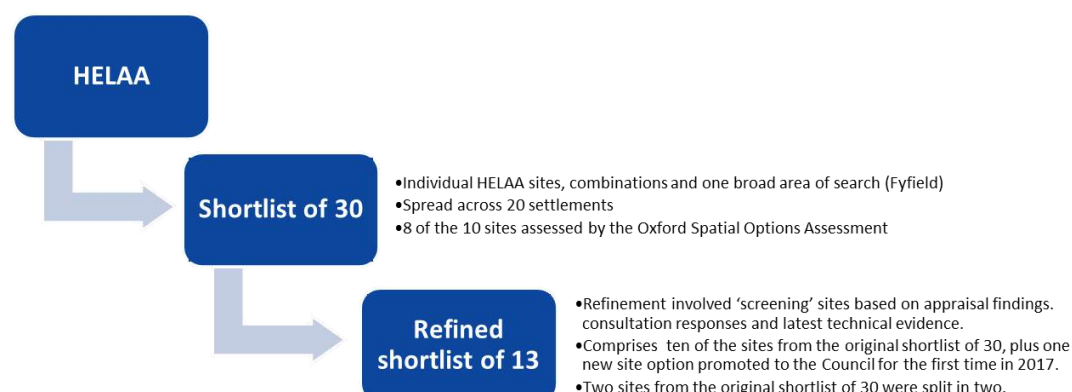
Figure 2.3: Establishing reasonable alternatives (September 2017)



2.3.3 Once again, a key step in the process involved appraising site options in isolation, with a focus on examining smaller site options in addition to larger site options. Figure 2.4 summarises the process of refining understanding of the larger site options reasonably in contention for allocation, serving to demonstrate that the starting point for the process was the Council's Housing and Economic Land Availability Assessment (HELAA), and serving to demonstrate that the process took into account appraisal findings and consultation responses from early 2017. Figure 2.5 then presents the final shortlist of larger and smaller site options, which fed-into the reasonable spatial strategy alternatives (i.e. provided 'building blocks' for establishing the reasonable spatial strategy alternatives).

2.3.4 It is important to note that the appraisal of site options, as presented in Appendices IV and V of the SA Report, took careful account of consultation responses received through the Draft Plan / Interim SA Report consultation, for example presenting quotes received from Oxfordshire County Council and several site promoters.

Figure 2.4: Examining larger site options over 2016/17 ahead of establishing reasonable spatial strategy alternatives (September 2017)



Legend

- Larger Sites
- Smaller Sites
- Ab-Ox Sub Area
- South East Vale Sub Area
- Western Vale Sub Area

Map Labels: Abingdon-on-Thames, Didcot, Wantage, Harwell, Blunham, Faringham, Fawley, Basingstoke, Winchester, Southampton, Reading, Oxford, London, Abingdon-on-Thames, Didcot, Wantage, Harwell, Blunham, Faringham, Fawley, Basingstoke, Winchester, Southampton, Reading, Oxford, London.

Scale: 0 to 4 Miles

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- 2.3.5 Ultimately it was possible to establish three reasonable spatial strategy alternatives, i.e. alternative packages of sites for allocation, which were presented in both tabular form (see Table 2.2) and across a series of maps – see Figures 2.6 to 2.8. The report also presented a concise summary of ‘unreasonable’ spatial strategy options – see Box 2.2.
- 2.3.6 The reasonable spatial strategy alternatives were then subjected to appraisal – see Table 2.3 – with the appraisal findings fed-back to the Council in time to inform finalisation of the Proposed Submission Plan. The Council formally responded to the appraisal, setting out reasons for supporting the preferred spatial strategy option (Option 2) ahead of the two alternatives – see Box 2.3.
- N.B. the appraisal was presented under the SA ‘framework’ established through a process of ‘scoping’, which included a dedicated consultation held in October 2016.
- 2.3.7 It is important to note that the detailed appraisal of reasonable spatial strategy alternatives, as presented in Appendix VI of the SA Report, took careful account of consultation responses received through the Draft Plan / Interim SA Report consultation, for example presenting quotes received from Oxfordshire County Council and several site promoters.

Table 2.2: The reasonable spatial strategy alternatives (September 2017)

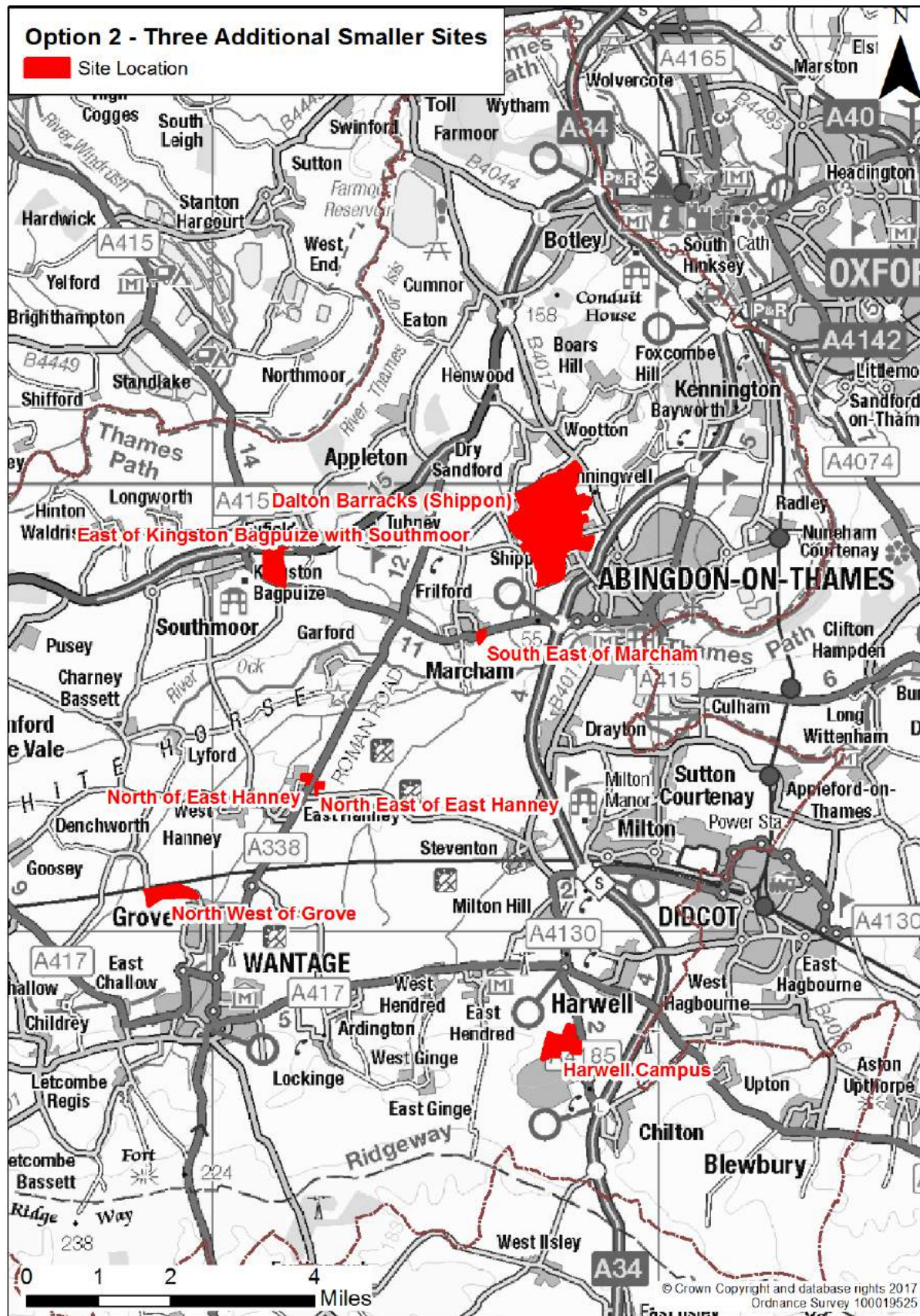
		Option 1 Do minimum	Option 2 Three additional smaller sites	Option 3 Six additional smaller sites (inc. Green Belt)
Allocations	Dalton Barracks	1,200		
	East Kingston Bagpuize w/ Southmoor	600		
	South of Wootton			125
	South of Cumnor			125
	South East Marcham		90	
	North of East Hanney		80	
	North of Steventon			80
	North East of East Hanney		50	
Ab-Ox completions / commitments / windfall		5,550		
Ab-Ox sub-total		7,350	7,570	7,900
% buffer over-and-above target		-2%	1%	5%
Allocations	Harwell Campus	1000		
	NW of Grove	400		
SE Vale completions / commitments / windfall		11,962		
SE Vale sub-total		13,362		
% buffer over-and-above target		10%		
Western Vale allocations		0		
Western Vale completions / commitments / windfall		3,816		
Western Vale sub-total		3,816		
% buffer over-and-above target		23%		
Total housing 2011 to 2031		24,536	24,756	25,086
% buffer over-and-above the target		8%	9%	10%

Box 2.2: Concise summary of unreasonable spatial strategy options (September 2017)

In order to gain an understanding of the rationale ('outline reasons') for the three reasonable housing growth alternatives **there is a need to read the chapter above as a whole**. However, it is also worthwhile giving explicit consideration here to some other options considered, but ultimately discounted as 'unreasonable':

- An option involving **lower growth in the Ab-Ox Sub Area** (i.e. lower than Option 1) - unreasonable given the sub area housing target, the plan would simply fail to address the agreed quantum of unmet housing need for Oxford within the district in locations that are demonstrably close and accessible to the city.
- An option not involving **Dalton Barracks** - unreasonable given no other larger site (>200 homes) well linked to Oxford found to have potential for allocation, let alone a site of the scale of Dalton Barracks. As such, removal of the site would necessitate numerous smaller sites to 'come in'.
- An option not involving **East of Kingston Bagpuize with Southmoor** - unreasonable given no better performing larger site. As such, removal of the site would necessitate smaller sites to 'come in'. Such sites would likely have to be outside the Green Belt, as it would be difficult to demonstrate the 'exceptional circumstances' necessary to justify removal of sites from the Green Belt in place of East of Kingston Bagpuize with Southmoor. Sites would likely be relatively dispersed, and hence less suited to supporting the maintenance, and potentially enhancement, of bus services (Kingston Bagpuize with Southmoor is well served by the existing 66 bus service which is currently 3/hr to Oxford), and there would be a high reliance on 'housing only' sites (East of Kingston Bagpuize with Southmoor will deliver a primary school).
- Any option involving an **alternative smaller site** to those included in Option 3 – unreasonable on the basis of the site options appraisal work undertaken.
- An option involving **higher growth in the Ab-Ox Sub Area** (i.e. higher than Option 3) - as per the discussion above, work to examine settlements and sites in isolation has not led to the identification of additional sites with the potential for allocation. The next best larger site is potentially West of Kingston Bagpuize with Southmoor, but high growth at Kingston Bagpuize with Southmoor is not supported.
- An option involving **lower growth in the South East Vale Sub Area** - either of the proposed allocations could feasibly be removed from the Strategy, in the sense that there is no 'hard and fast' requirement to provide for a number of homes above the sub area's housing target established by LPP1. However, on balance, removal of either site is considered 'unreasonable', for the purposes of establishing reasonable alternatives. North of Harwell Campus represents a unique opportunity that should be capitalised upon now, recognising Science Vale objectives; whilst North West Grove stands out as a relatively unconstrained site, and its allocation will support the strategic expansion of Wantage/Grove.
- An option involving **higher growth in the South East Vale Sub Area** - the proposal is already to deliver a quantum of homes 10% above the LPP1 established target figure, hence there is no rationale for considering additional allocations. Whilst Science Vale is 'ring fenced' in respect of calculating a five year housing land supply, the proposed housing trajectory should be suitably robust. This statement is made in light of a recent (April 2017) Inspector's report dealing with an appeal site at Steventon, which found there to be a five year housing land supply within the Ring Fence area (Ref: P15/V2497/FUL).
- The **March 2017 Preferred Option** - is now understood to be 'unreasonable' in light of consultation responses received and latest understanding of the technical evidence base. In particular, it is now understood that: North East of Marcham and West of Harwell are unsuitable for allocation; and South East Marcham is suited to a smaller development (thereby leaving undeveloped land safeguarded for a possible future Marcham Bypass).
- The **March 2017 reasonable alternatives** - the reasons for 'refining' the March 2017 reasonable alternatives are discussed above (within Section 6.5). Some of the sites that featured within the March 2017 reasonable alternatives are now no longer in contention, on the basis of latest evidence and understanding, whilst at others (namely Dalton Barracks and Harwell Campus) work has served to clarify understanding of the number of homes suitable, such that the number of homes need not be a variable across the reasonable alternatives.

Figure 2.7: Reasonable spatial strategy Option 2 (September 2017) - Three additional smaller sites



[illegible]

Table 2.3: Summary reasonable alternatives appraisal findings (September 2017)

Summary findings and conclusions			
Objective	Categorisation and rank		
	Option 1 Larger sites	Option 2 Three additional smaller sites	Option 3 Six additional smaller sites (inc. Green Belt)
Homes	3	2	1
Services and facilities	1	1	2
Movement	=	=	=
Health	=	=	=
Inequality and exclusion	=	=	=
Economy	2	2	1
Natural environment	1	1	2
Heritage	1	2	3
Landscape	1	2	3
Pollution	1	2	2
Climate change mitigation	=	=	=
Climate change adaptation	1	2	2

Conclusions

The appraisal shows Option 1 to perform best in terms of the greatest number of objectives, primarily because it would involve concentrating growth at a small number of sites that are relatively unconstrained in terms of environmental issues/objectives. However, Option 1 performs notably least well in terms of 'Housing' objectives, as there would be an over-reliance on large sites.

Option 2 outperforms Option 3 in respect of several environmental objectives, largely on the basis that one of the sites included in Option 3 (North of Steventon) is significantly constrained by a lack of capacity at the village primary school, another (South of Cumnor) is seemingly somewhat constrained in landscape/heritage terms (given contribution of the site to the setting of the Cumnor Conservation Area) and another (South of Wootton) is somewhat constrained in biodiversity terms (given proximity to Cothill Fen SAC). However, Option 3 is judged to outperform Option 2 in respect of 'Economy' objectives, recognising that two of the three additional smaller sites that would 'come in' (South of Cumnor and North of Steventon) are well located to either Oxford or Science Vale.

Box 2.3: The Council's response the appraisal of reasonable alternatives (September 2017)

"The Council has followed an iterative approach to plan making, ensuring the plan is informed by a wide range of technical evidence, formal and informal consultation, including with key stakeholders such as Oxfordshire County Council and the Statutory Bodies, and Sustainability Appraisal (SA). The SA has informed each stage of plan making, with an 'Interim' report subject to consultation alongside the 'Preferred Options' plan in March 2017.

The Council has followed a comprehensive approach to site selection, based on the approach followed to inform the Part 1 plan and consistent with guidance. This has included assessing over 400 sites with a proportion of these being assessed in some detail through the SA, both in isolation and in combination. The Council's site selection has been informed by the SA and other wide-ranging factors. Key considerations include: minimising impacts on an already constrained highway network and seeking to maximise opportunities for supporting sustainable modes of travel; supporting housing delivery to fully meet the identified housing need for the district and for the agreed quantum of unmet housing need for Oxford to be addressed within the Vale and maintaining an up to date housing supply, which should rely, as far as possible, on allocating sites of different size, type and geography; supporting the delivery of appropriate infrastructure; and seeking to minimise any harmful consequences, such as harming the environment.

The site allocations set out in the Part 2 plan represent the Council's strategy for meeting sustainable development, having considered a range of alternatives (i.e. alternative sites, and alternative strategies). Development at Dalton Barracks, for example, provides an opportunity to: maximise use of brownfield land; minimise Green Belt impact; deliver a comprehensive package of infrastructure including new schools; connect new housing well to Oxford and Abingdon-on-Thames via sustainable modes; and facilitate a comprehensive approach to planning for the long term. Other sites seek to make use of relatively unconstrained sites, minimise harmful impacts and balance these with fully meeting the identified housing requirement. Development at Harwell Campus provides an opportunity to support highly sustainable development, maximising the opportunity for the creation of a live/work/play community, whilst also making use of brownfield land and minimising harm to the environment (particularly as the site is already allocated for development).

The alternatives appraisal summary table presented above (Chapter 7) finds the preferred option (Option 2) to have some draw-backs in environmental terms, relative to the lower growth option (Option 1). The two potentially 'significant' negative effects flagged by the appraisal relate to Wastewater Treatment Capacity and air quality (particularly within the Marcham AQMA). The Council is confident in the ability to mitigate impacts by setting a robust site-specific policy framework (which has been refined for all proposed site allocations, following consultation at the Preferred Options stage).

The appraisal also finds the preferred option to have some draw-backs in housing and 'movement' terms relative to the higher growth; however it is apparent that neither conclusion is clear-cut. In respect of housing objectives, the preferred option reflects best current understanding of needs (and work is ongoing outside of the Local Plan process to ensure that Oxford's affordable housing needs are addressed as fully as possible). In respect of transport objectives, the existing congestion on the A34 is a constraint to higher growth."

What are the SA findings at this stage?

- 2.3.8 Part 2 of the SA Report presented an appraisal of the Proposed Submission Plan under the SA framework, reaching the following conclusion:

"The appraisal finds the Publication Plan to perform well in terms of the majority of objectives, with 'significant positive effects' predicted in terms of: 'Housing' (as objectively assessed housing needs should be met), 'Services and Facilities' (given an expectation that the proposed Dalton Barracks scheme will lead to delivery of a new secondary school) and 'the Economy' (given the proposed high growth strategy within Science Vale). No 'significant negative effects' are predicted; however, issues/uncertainties are highlighted in respect of: 'Pollution' (given a risk of worsened air quality within the Marcham AQMA; and 'Climate change adaptation' (given some issues in respect of Wastewater Treatment Works capacity). A number of effects are dependent on the nature of the scheme at Dalton Barracks, given the site's potential capacity."

2.3.9 It is important to note three final points regarding the appraisal:

- The appraisal took account of consultation responses from early 2017, for example the consultation response received from Oxfordshire County Council, which is quoted at length as part of the appraisal.
- The appraisal presented several recommendations, and also presented several examples of past recommendations having been taken into account.
- The appraisal concluded with a discussion of 'cumulative effects' – see Box 2.4.

Box 2.4: Conclusions on cumulative effects (September 2017)

"The SEA Regulations, which underpin the SA process, indicate that stand-alone consideration should be given to 'cumulative effects', i.e. effects of LPP2 in combination with other plans.

The first point to note is that LPP2 allocations will impact in-combination with LPP1 allocations and other commitments. Commitments are part of the 'baseline' situation, and hence are taken into account as part of the appraisal above. Issues/impacts include, for example -

- *Settlements - the effect of the proposed North West of Grove allocation, for example, is considered in-combination with commitments in excess of 5,000 homes at Wantage/Grove.*
- *A34 and A420 corridors (and town centre traffic congestion, notably in Abingdon) - Evaluation of Traffic Impacts (ETI) work for LPP2 has taken into account commitments.*
- *Landscape and Green Belt - the Landscape and Green Belt studies completed for LPP2 consider in combination effects for landscape character areas and the Oxford Green Belt.*

LPP2 will also impact in-combination with other local plans in the sub-region. Local plans are constantly emerging, and hence it is never possible to know the baseline situation precisely; however, the appraisal has sought to give consideration to likely issues and impacts as far as possible. Perhaps most notably, the appraisal has considered issues/impacts at the Oxfordshire Housing Market Area (HMA) scale. As part of this, there has been a need to recognise that the baseline situation is one whereby Oxford City will be able to provide for 8,000 homes only, thereby resulting in unmet needs of 15,000 homes.

The Habitats Regulations Assessment (HRA) process has also included a particular focus on the matter of LPP2 impacting in combination with other local plans. In particular, the HRA Report includes a detailed discussion of how numerous local plans will result in increased traffic on the A34, which in turn will lead to increased air pollution in the vicinity of the Oxford Meadows Special Area of Conservation (SAC).

In-combination impacts at the 'larger than local' scale of the North Wessex Downs Area of Outstanding Natural Beauty (AONB) are another consideration. LPP2 proposes major development in the AONB at North of Harwell Campus, and it is also noted that the baseline situation is one whereby there is a committed housing site at nearby East Hendred (which the AONB Unit lists as one of its top three 'disappointments' of 2016/17). Furthermore, it is understood that other local plans (the AONB straddles three unitary authorities and four district councils) are giving consideration to options involving major development in the AONB. Nonetheless, it is difficult to envisage in-combination effects. The AONB is an expansive area and there are no major viewpoints in the vicinity of Harwell Campus (see Figure H in Appendix II). Compton and Ilsley are two settlements in relative proximity, in West Berkshire District; however, neither settlement is set to expand significantly. The West Berkshire Site Allocations Plan allocates one brownfield site for 140 homes at the former, and nil sites at the latter."

What happens next?

2.3.10 Part 3 of the SA Report explained the subsequent process of publication (under Regulation 19 of the Local Planning Regulations) and then submission and examination.

2.3.11 It also presented 'measures envisaged concerning monitoring', in particular finding that "... there might be a focus on monitoring indicators relating to air quality and wastewater treatment work capacity. Other issues/impacts that might benefit from increased monitoring effort include affordable housing delivery, recreational use of Cothill Fen SAC and delivery of transport improvement measures."

Consultation

- 2.3.12 In total, 3,492 formal representations were received on the plan by 425 respondents. Representations received covered all aspects of the Plan, with a summary of key issues raised, in respect of each policy area covered by the plan, presented within Chapter 5 of the Council's 'Regulation 22 Consultation Statement'.⁵ The Consultation Statement also presents a discussion of representations made specifically on the SA Report (see paragraphs 5.462 to 5.468).

2.4 Proposed modifications / SA Report Addendum (March 2019)

- 2.4.1 Following examination hearings in summer 2018 the Inspector sent the Council a list of proposed modifications to the submitted plan. The proposed modifications were subjected to appraisal with appraisal findings presented within an SA Report Addendum, which was published for consultation alongside the proposed modifications in March 2019.

- 2.4.2 The appraisal of proposed modifications reached the following conclusion:

"The appraisal has focused primarily on the proposed changes to the spatial strategy, namely the proposal to delete the 1,000 home Harwell Campus allocation and also delete references to growth opportunity at Dalton Barracks beyond the plan period (consequently removing less land from the Green Belt; also of note is the deletion of reference to providing a link between Dalton Barracks and the Lodge Hill Park and Ride site). Both proposals are found to perform well in respect of 'landscape' objectives, but do give rise to tensions in certain respects, most notably in terms of 'health' (as the Dalton Barracks proposed modification removes, or at least defers, the opportunity to deliver a new country park) and 'the economy' (as the deletion of the Harwell Campus allocation is, on balance, considered to conflict with objectives for expanding the role of the Campus within Science Vale, and the national economy). Other proposed modifications generally perform well, in particular the proposed new Core Policy 15c: Grove Comprehensive Development Framework, which is supportive of several sustainability objectives."

- 2.4.3 Consideration was also given to the effects of 'the submitted plan plus proposed modifications', reaching the following conclusion:

"The plan plus proposed modifications performs less positively [relative to the submission plan] in respect of 'the economy'; however, the plan does now perform better in 'landscape' terms. Conclusions reached within the SA Report in respect of the other nine sustainability topic headings broadly hold true for the plan plus proposed modifications."

2.5 Plan finalisation (June 2019)

- 2.5.1 The Inspector's final report on LPP2 comments on a number of the issues that had been a focus of preceding SA, notably:

- Spatial strategy in respect of meeting Oxford City's unmet needs –

"The strategy of the LPP2, which is fully supported by Oxford City Council, is to accommodate the unmet housing needs of Oxford City within the area closest to Oxford, namely the Abingdon & Oxford Fringe sub area. Didcot and some other parts of the South East Vale, and even parts of the Western Vale, have good transport links to Oxford and are therefore likely in practice to accommodate some of its open market housing needs. However, much of Oxford's housing needs are for affordable housing, particularly social rented housing, which is to be provided on specific sites in the Vale by agreement between the two Councils. Such occupiers should have the opportunity of accommodation in locations particularly closely connected to Oxford."

⁵ See www.whitehorsedc.gov.uk/services-and-advice/planning-and-building/planning-policy/local-plan-2031-part-2

In any event, the pattern of development should minimise the need to travel overall. This justifies a distribution of the 2,200 dwellings skewed towards Oxford compared to the distribution of the housing allocations to meet the needs of the Vale established by the LPP1. For these reasons, the principle set out in the LPP2 that the additional dwellings should be provided in the Abingdon and Oxford Fringe sub area is justified. This increases the overall requirement in that area to 7,638 and in the 'rest of the district' monitoring area to 10,910, the extra dwellings to be delivered between 2019-31.

The LPP1 already allocates a number of large housing sites that are closely connected to Oxford which could notionally assist in meeting the identified requirement. These are listed in LPP2 table 2.1 and include two sites north of Abingdon, a site in north west Radley and one south of Kennington. With no controls on occupation of the market housing and an agreement between the Councils to allocate some social homes to Oxford City residents, these sites will in practice contribute towards meeting Oxford's needs. Together with the LPP2 allocation dealt with under Issue 2, these will provide more than the 2,200 dwellings that are necessary near to Oxford. Further allocations will however be necessary elsewhere in the sub area to meet the Vale's needs."

- The approach to growth at Dalton Barracks –

"... whilst the concept of a strategic housing allocation is justified, the proposal as submitted is unsound in some respects and requires modification. The proposal as submitted is to remove Green Belt designation from an area large enough to accommodate a new settlement of up to 4,500 dwellings but only to allocate the site for 1,200 dwellings at this stage with policy criteria to judge any larger proposals which might come forward. No mechanism is proposed to limit development on the site to 1,200 dwellings and indeed, this is not intended. There is no comprehensive evidence base that the whole area is developable and able to satisfactorily accommodate a new settlement of up to 4,500 dwellings in the long term. A series of criteria setting out the tests that would be applied to determine whether this amount of housing could be provided, however carefully formulated, leaves the possibility that the criteria may not be met. In those circumstances the extent of the alteration to the Green Belt would have been abortive and, with hindsight, not justified.

... Dealing specifically with the strategic housing allocation as amended, the proposal is for 1,200 dwellings on part of the open, flat, relatively featureless airfield to the west of the built-up part of the barracks which has no access for the general public. The amended allocation effectively lies outside the secure operational area, reducing any risk that delays in re-providing accommodation for the military units may hold up delivery of housing on the site. Whether or not the whole airfield comprises previously developed land, the topography of the area means the visual impact of housing on the site would be relatively limited. With landscaping, there would only be glimpses of the new housing through the hedgerows along the roads to the west and north of the site and distant views from the high ground to the north east, but all of these would be seen in the context of the existing barracks. Indeed, the future demolition of the five large hangars on the site would result in a visual improvement.

To the north west the site lies close to the Dry Sandford Pit Site of Special Scientific Interest and Cothill Fen SAC but a buffer of parkland, 30 hectares in size, wrapping around the western and northern sides of the development would have ecological benefits, act to divert recreational pressure and help screen the site from any views. The parkland would also ensure adequate separation of the new housing from Gozzards Ford and Cothill. To the east the site directly adjoins existing housing in Shippon where landscaping and a sensitive layout will be required to avoid any undue impact on the character of the village, particularly the historic core along Barrow Road.

The proposal would incorporate garden village principles, provide 35% (420) affordable homes, at least 30 ha of parkland, other open space, a local centre, two-form entry primary school, contributions to secondary school provision in Abingdon and other community services and facilities. Development of the site would thus benefit the existing residents of Shippon by providing an enhanced range of local facilities, particularly a village primary school which the community currently lacks.

The site is well related to both Abingdon and Oxford City with potential for a comprehensive footpath and cycleway network linking the site to surrounding areas. This would include upgrading the existing footpath and overbridge between Shippon and Abingdon to improve access towards the proposed Lodge Hill park and ride. Regular City4 bus services run along Cholswell Road and Wootton Road linking to Abingdon and Oxford City, from where a wide range of destinations can be accessed, and a shuttle bus service linking the site with Abingdon town centre could also be considered. Given the location of the site and the opportunities for new services and facilities to serve the additional population the proposal would reduce the need to travel overall...

- The approach to growth at Harwell Campus –

“If the case for an innovation village associated with the campus were to be accepted, by definition the housing could not be accommodated elsewhere and there would be no scope for the development outside the AONB or meeting the need in some other way. However, at present the evidence is insufficient to justify the proposal. Whilst the important scientific, research, innovation and economic roles of the campus are fully recognised and supported, the LPP1 strategy is to ensure employment growth in the Science Vale – including that at the campus – is matched by additional housing provision in the Science Vale as a whole. CP5, the housing supply ring fence, is designed to deliver this objective and ensure sufficient housing is provided in nearby settlements to limit commuting distances and ensure a sustainable pattern of development overall. As paragraph 91 below explains, even without 1,000 dwellings at Harwell Campus, the plan is sufficiently flexible to ensure the requirement for additional housing within the South East Vale – almost the same area as the Science Vale – is likely to be met over the plan period.

In conclusion, there are no proven exceptional circumstances nor can it be demonstrated to be in the public interest for major housing development to be allocated in the North Wessex Downs AONB at Harwell Campus.”

- The approach to growth at Kingston Bagpuize -

“The allocation, whilst large in relation to the size and current facilities of the village, would deliver a new primary school/nursery, local centre, contributions to other facilities, public open space, affordable housing, an A415/A420 link, traffic relief and environmental improvements in the village centre. With frequent public transport services to Oxford and Swindon, the village is one of the more sustainable locations within the sub area. Further housing would provide an opportunity to enhance village facilities and with careful planning there is no reason why it could not form an attractive place to live.”

- The total quantum of new homes -

“As modified, Policy CP4a demonstrates a potential housing supply of 25,359 dwellings in the district as a whole during the plan period compared to a requirement of 22,760, an excess of 2,599 dwellings or 11.4%. The equivalent figures in modified Policies CP8a, CP15a and CP20a for the Oxford and Abingdon Fringe, South East Vale and Western Vale sub areas respectively are an excess provision of 542 dwellings or 7.1%, 1,326 dwellings or 11.1% and 731 dwellings or 23%. This built in flexibility is however necessary in the interests of a sound plan to address concerns that certain large strategic sites may not come forward as currently anticipated.

On the basis of these percentages the risk to delivery is greatest in the Oxford and Abingdon Fringe sub area where there are large sites allocated in the LPP1 and at Dalton Barracks and Kingston Bagpuize with Southmoor in the LPP2. Of the LPP2 sites, the former relies on the release of the site by the Ministry of Defence and, as modified, both depend on an upgrade to the Frilford junction and satisfactory air quality mitigation for Marcham. However, the release of the Barracks/Airfield is firm government policy, the upgrade of Frilford junction is planned in 2024/25 and air quality mitigation is under investigation. The assumed timing of completions on both sites allows for generous lead in times and thus a reasonable prospect of delivery in the necessary timescale, thus meeting the NPPF test. There are also a range of smaller sites in both plans to assist delivery. Finally but importantly, the additional housing requirement for Oxford City in the sub area is a working assumption rather than definitive and warrants some caution in allocating sites in the LPP2.”

- 2.5.2 In respect of the SA process specifically, the Inspector's Report found that: *"Sustainability Appraisal has been carried out throughout the preparation of the LPP2, including an addendum at MM stage, and is adequate."*

3 MEASURES DECIDED CONCERNING MONITORING

- 3.1.1 Section 14 of the SA Report (2017) presented a discussion of the 'measures envisaged concerning monitoring', stating:

"A proposed monitoring framework is presented within Appendices of LPP2, and links to Policy CP47a (Delivery and contingency). The plan monitoring framework should provide a good basis for monitoring the effects of LPP2."

The 'uncertain' effects listed at para 11.1.2 above serve to suggest that there might be a focus on monitoring indicators relating to air quality and wastewater treatment work capacity. Other issues/impacts that might benefit from increased monitoring effort include affordable housing delivery, recreational use of Cothill Fen SAC and delivery of transport improvement measures."

- 3.1.2 No modifications were made to the monitoring framework through the examination process, although the Inspector's Report does include a discussion of monitoring housing supply, stating:

"Monitoring the effectiveness of the LPP2 in ensuring the planning strategy for the district is being delivered will be carried out under the provisions of Policy CP47a. This is equivalent to the very similar Policy CP47 in the LPP1 which, as modified, was found sound. Should development of allocated sites or the sub area strategies not progress as envisaged, Policy CP47a obliges the Council to investigate the reasons and implement any appropriate action including the resolution of infrastructure issues, accelerating delivery on committed sites, identifying further sites or undertaking a partial or full review of the combined LPP1/LPP2 plan. There is also a legal requirement to review the plan after five years and in the case of Oxfordshire a commitment to prepare a Joint Spatial Strategy after which the Council plans to review both the LPP1 and LPP2."

4 CONCLUSIONS ON THE SA PROCESS

- 4.1.1 This SA Statement demonstrates that a robust SA process has been progressed alongside plan-making, with appraisal findings and consultation responses feeding in to decision-making at key junctures. Most importantly, in terms of compliance with both the SEA⁶ and Local Planning⁷ Regulations, the SA Report was published alongside the proposed submission version of LPP2 in 2017, presenting the required information, namely the information required by Regulation 12 of the SEA Regulations. This report served to inform representations on the plan, and then served to inform plan finalisation.

- 4.1.2 This SA Statement is the final step in the SA process. Its aim is to explain the 'story' of the plan-making / SA process, and also present measures decided concerning monitoring. **Table 4.1** serves to demonstrate that this report presents the required information.

⁶ Environmental Assessment of Plans and Programmes Regulations 2004

⁷ Town and Country Planning (Local Planning) (England) Regulations 2012

Table 4.1: Regulatory checklist

The SA Statement must...	How has this report presented the required information?
Summarise how environmental (and wider sustainability) considerations have been integrated into the plan	<p>This report has sought to provide examples of key sustainability considerations that have been highlighted through appraisal and consultation, which in turn were taken into account, and have been integrated into the plan.</p> <p>First and foremost, the relative merits of competing site options and spatial strategy alternatives were appraised in terms of a range of sustainability issues/objectives, with a view to informing selection of the best performing sites / spatial strategy.</p>
Summarise how the SA Report and consultation responses received, as part of the Draft Plan / SA Report consultation, have been taken into account when finalising the plan.	<p>This statement seeks to explain an iterative process, particularly in respect of exploring reasonable alternatives. Sections 2.2 and 2.3 end with a discussion of consultation responses received, and reference is made to actioning/reflecting consultation responses within Section 2.3. It is naturally the case that all consultation responses were taken into account: A) by the plan-makers at the subsequent plan-making stage; and B) by the SA consultants, both when refining understanding of the SA scope, and when establishing / refining reasonable alternatives.</p> <p>Also, it is noted that the Inspector's Report stated: <i>"The consultation [on proposed modifications] was accompanied by an addendum to the original SA, a statement to inform the Habitats Regulations Assessment (HRA) and additional transport and air quality evidence in support of the allocation at Dalton Barracks/Abingdon Airfield. I have taken account of the consultation responses, the SA, HRA and additional evidence in coming to my conclusions in this report and in this light I have made amendments to the wording of MM27 and MM28 to address concerns relating to air quality in Marcham."</i></p>
Summarise the reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with.	<p>Section 2 explains how the Council explicitly responded to the alternatives appraisal ahead of the plan being finalised for consultation at Draft Plan and Proposed Submission Plan / Publication stages.</p> <p>The Inspector's report equally set out detailed reasons in support of his conclusion on plan soundness, with reference to reasonable alternatives.</p>
Summarise the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan	See Section 3