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# Cherwell Local Plan Part 1 Partial Review

## Sustainability Appraisal Adoption Statement

Prepared by LUC  
September 2020

Draft

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# 1 Introduction

- 1.1 Cherwell District Council adopted the Cherwell Local Plan Part 1 Partial Review – Oxford’s Unmet Housing Need in September 2020.
- 1.2 During the preparation of the Partial Review the Council was required by law to carry out a Sustainability Appraisal (SA) and a Strategic Environmental Assessment (SEA) of the Plan as it developed. Both the SA and SEA requirements were met through a single integrated process (referred to as SA), the method and findings of which were described in a number of SA reports published alongside the different versions of the Plan during its development.
- 1.3 Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations (2012) requires the Council to make the final SA Report available alongside the Adopted Local Plan.
- 1.4 The SA Report (June 2017) for the Council’s Proposed Submission Plan was published alongside the Plan for public consultation in July 2017. Following this consultation, an SA Addendum (February 2018) was produced for submission alongside the Submission Plan for examination (February 2018). This SA Addendum summarised relevant plan-making developments since the publication of the Proposed Submission Plan – consultation responses, evidence updates and proposed Focused Changes and Minor Modifications to the Proposed Submission Plan – and set out their implications in SA terms. Following the examination Main Hearings in February 2019, a schedule of Main and Minor Modifications to the Proposed Submission Plan were prepared and published for public consultation in November 2019 following receipt of a Post Hearing Advice Note (July 2019) from the Planning Inspector examining the Partial Review. A second SA Addendum (September 2019) was prepared and published for public consultation alongside, which identified the effects of the Modifications and their reasonable alternatives.
- 1.5 The final SA report for the adopted Local Plan Part 1 Partial Review therefore comprises the following documents:
  - Cherwell Local Plan Part 1 Partial Review Proposed Submission Sustainability Appraisal Report (LUC, June 2017);
  - Cherwell Local Plan Part 1 Partial Review Sustainability Appraisal Addendum – Proposed Changes to the Proposed Submission Cherwell Local Plan Part 1 Partial Review (LUC, February 2018); and
  - Cherwell Local Plan Part 1 Partial Review Sustainability Appraisal Addendum – Main Modifications to the Proposed Submission Cherwell Local Plan Partial Review (LUC, September 2019).<sup>1</sup>
- 1.6 In the Inspector’s Report published in August 2020 the Inspector concluded that SA has been carried out and is adequate.

## Requirement for the Adoption Statement

- 1.7 In addition to the requirement in Regulation 26 of the Town and Country Planning (England) Regulations (2012), the SEA Regulations<sup>2</sup> also require a number of steps to be taken upon adoption of a plan (in this case the Cherwell Local Plan Part 1 Partial Review). Specifically, SEA Regulation 16 sets out the post adoption procedures and requirements for SEA. The planning authority must, as soon as reasonably practicable after the adoption of a plan for which an

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<sup>1</sup> The SA Addendum submitted alongside the Proposed Submission SA Report for examination in 2018 appraised a schedule of Focused Changes to the Proposed Submission Cherwell Local Plan Part 1 Partial Review for consideration by the Inspector during the hearing sessions of the examination. The SA Addendum published in 2019 appraised the final schedule of main modifications to the Proposed Submission Cherwell Local Plan Part 1 Partial Review agreed with the Inspector.

<sup>2</sup> The Environmental Assessment of Plans and Programmes Regulations 2004 - SI No. 1633: <https://www.legislation.gov.uk/uksi/2004/1633/contents/made>

SA/SEA has been carried out, make a copy of the plan publicly available alongside a copy of the SA report and an 'SEA adoption statement', and inform the public, Historic England, Natural England and the Environment Agency about the availability of these documents. The SEA adoption statement must explain:

- How environmental (and sustainability) considerations have been integrated into the Plan.
- How the Environmental Report has been taken into account during the preparation of the Plan.
- How the opinions expressed by the public and consultation bodies during consultation on the plan and the Environmental Report have been taken into account.
- The reasons for choosing the Plan as adopted, in the light of other reasonable alternatives considered.
- The measures that are to be taken to monitor the significant environmental and sustainability effects of the implementation of the Plan.

1.8 As the SEA process was incorporated into the SA process, this document constitutes the SA/SEA Adoption Statement for the Partial Review. The document is organised according to the SEA Regulation requirements listed above and reflects the following structure:

- **Chapter 2** summarises how environmental considerations have been integrated into the Plan including by explaining who carried out the SA/SEA and what assessment framework was used.
- **Chapter 3** summarises how the Environmental Report has been taken into account, considering the links between the plan-making and SA/SEA processes.
- **Chapter 4** summarises the consultation opinions provided on the Environmental Report at each stage and describes how the results were taken into account.
- **Chapter 5** describes why the Adopted Local Plan Part 1 Partial Review was chosen, in light of the other reasonable alternatives dealt with.
- **Chapter 6** describes how the significant environmental effects of the implementation of the Local Plan Part 1 Partial Review will be monitored.

## 2 How Environmental Considerations Have Been Integrated into the Local Plan Part 1 Partial Review

- 2.1 The SA (incorporating SEA) of the Cherwell Local Plan Partial Review started in October 2015 when LUC was commissioned to prepare all SA/SEA outputs, starting with the SA Scoping Report (January 2016). LUC has subsequently fulfilled all stages of the SA/SEA process for the Plan, including this SA Adoption Statement.
- 2.2 The purpose of the SA was to assist the Council in preparing the Partial Review by identifying the key sustainability issues that face the District, neighbouring Oxford and the wider county of Oxfordshire, to predict what the likely effects of the Plan on these issues would be and put forward recommendations to mitigate and monitor negative effects identified. The aim was to help ensure that the Plan has as many positive effects as possible and that any negative effects are avoided or mitigated as far as reasonably possible alongside implemented policies, particularly those resulting in new development within Cherwell.
- 2.3 The SA was undertaken iteratively, such that at each stage of the Partial Review's preparation, the sustainability and environmental effects of the options for the Plan were assessed. SA Reports were produced to describe the approach taken, identify the likely effects of the Plan and make recommendations as to how significant negative effects could be avoided and mitigated and significant positive effects improved. In this way, environmental and sustainability considerations were integrated into the Plan as it was developed. Chapter 3 expands on how the findings of the SA process have been taken into account through the plan-making process.
- 2.4 The way in which the environmental and sustainability effects of the Partial Review were consistently described, analysed and compared was through the use of a set of SA objectives referred to as an 'SA framework'. The SA framework used to appraise the Plan was developed during the Scoping stages of the SA process in late 2015 and consulted upon in the SA Scoping Report alongside an Issues Paper in January 2016. The SA objectives used to appraise the Cherwell Adopted Local Plan Part 1 were used as the starting point for developing the SA framework for the Partial Review. A number of amendments were made in light of the principal driver for the Partial Review (to accommodate some of Oxford's unmet housing need), updates to relevant European, national and regional policies, plans and programmes and changes in local sustainability issues and evidence. The updates to the SA objectives also sought to avoid duplication and any single SA objective covering too many issues. A few minor changes were also made to address comments received during consultation on the draft SA framework in the SA Scoping Report (January 2016).
- 2.5 Given that the principal driver for the Partial Review is to accommodate some of Oxford's unmet housing need and Cherwell's Local Plan already makes provision for District's own housing and employment needs over the Plan period, the SA objectives relating to the provision of housing and economic growth development were appraised mainly for effects on the City of Oxford, although wider indirect economic effects were recognised.
- SA Objective 1 – To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home.
  - SA Objective 16 – To ensure high and stable levels of employment so everyone can benefit from the economic growth of the District and Oxford and Oxfordshire.
  - SA Objective 17 – To sustain and develop economic growth and innovation, an educated/skilled workforce and support the long term competitiveness of the District and Oxford and Oxfordshire.
- 2.6 Furthermore, SA objectives considered to be of particular spatial relevance to Oxford as well as Cherwell were appraised for effects in relation to both the City of Oxford and Cherwell District:

- SA Objective 3 – To reduce poverty and social exclusion.
- SA Objective 6 – To improve accessibility to all services and facilities.
- SA Objective 10 – To reduce air pollution (including greenhouse gas emissions) and road congestion.

2.7 The remaining SA objectives in the SA framework relate to sustainability issues in Cherwell, generally relating to its natural and historic environment, and were therefore only appraised for effects on Cherwell District.

2.8 **Table 2.1** below presents the SA framework for the Cherwell Partial Review. The final column shows how the 'SEA topics' (listed in Schedule 2 of the SEA Regulations as the topics to be covered in SEAs) were all covered by at least one of the SA objectives.

**Table 2.1: SA Framework used to appraise the adopted Local Plan Part 1 Review and its reasonable alternatives**

SA Objective	Sub-Objective	SEA Topic
<b>SA Objectives related to meeting Oxford's Needs (Oxford Effects Recorded)</b>		
1. To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home.	1. Will it contribute to meeting Oxford's unmet housing requirements? 2. Will it increase the supply of affordable homes, including for the homeless? 3. Will it encourage a mixed use and range of housing tenure, including meeting affordable housing needs?	Population and Human Health
16. To ensure high and stable levels of employment so everyone can benefit from the economic growth of the District and Oxford and Oxfordshire.	1. Will it promote accessible employment opportunities? 2. Will it contribute to reducing short and long-term unemployment?	Population and Human Health and Material Assets
17. To sustain and develop economic growth and innovation, an educated/skilled workforce and support the long term competitiveness of Oxford and Oxfordshire.	1. Will it encourage new business start-ups and opportunities for local people? 2. Will it improve business development and enhance productivity? 3. Will it enhance the image of Oxford as a business location? 4. Will it encourage inward investment? 5. Will it make land and property available for business development? 6. Will it assist in increasing the viability of the rural and farming economy? 7. Will it promote development in key sectors? 8. Will it promote regeneration; reducing disparities with surrounding areas? 9. Will it promote development in key clusters? 10. Will it increase business opportunities in the tourism sector?	Population and Human Health and Material Assets
<b>SA objectives with particular spatial relevance to Oxford (Oxford and Cherwell Effects Recorded)</b>		
3. To reduce poverty and social exclusion.	1. Will it assist in reducing poverty and social exclusion in Cherwell and Oxford? 2. Does the spatial option provide opportunities to contribute towards the regeneration of more deprived neighbourhoods?	Population, Human Health and Material Assets

SA Objective	Sub-Objective	SEA Topic
6. To improve accessibility to all services and facilities.	<ol style="list-style-type: none"> <li>1. Will it promote compact, mixed-use development, with good accessibility to local facilities (e.g. employment, education, health services, shopping, leisure, green spaces and culture) that improves accessibility and decreases the need to travel?</li> <li>2. Will it provide convenient access to the cultural offer of Oxford via existing transport links?</li> </ol>	Population, Human Health and Material Assets
10. To reduce air pollution (including greenhouse gas emissions) and road congestion.	<ol style="list-style-type: none"> <li>1. Will it address any particular air quality impacts arising from specific operational and/or construction related development activities?</li> <li>2. Will it improve air quality particularly within identified AQMAs?</li> <li>3. Will it promote more sustainable transport patterns and reduce the need to travel, particularly in areas of high congestion, including public transport, walking and cycling?</li> <li>4. Will it promote more sustainable transport patterns in rural areas?</li> <li>5. Will it reduce journey times between key employment areas and key transport interchanges?</li> </ol>	Air, Climatic Factors, and Human Health
<b>Other Social and Economic SA Objectives (Cherwell Effects Recorded)</b>		
2. To improve the health and wellbeing of the population & reduce inequalities in health.	<ol style="list-style-type: none"> <li>1. Will it improve access to doctors' surgeries and health care facilities?</li> <li>2. Will it encourage healthy lifestyles and provide opportunities for sport and recreation?</li> </ol>	Population, Human Health and Material Assets
4. To reduce crime and disorder and the fear of crime.	<ol style="list-style-type: none"> <li>1. Are the principles of good urban design in reducing crime promoted as part of the proposal?</li> <li>2. Will it assist in reducing actual levels of crime?</li> <li>3. Will it assist in reducing the fear of crime?</li> </ol>	Population and Human Health
5. To create and sustain vibrant communities.	<ol style="list-style-type: none"> <li>1. Will it improve residential amenity (including potential to reduce light, smell and noise pollution) and sense of place?</li> <li>2. Will it improve the satisfaction of people with their neighbourhoods as places to live and encourage ownership?</li> </ol>	Population, Human Health and Material Assets
<b>Environmental SA Objectives (Cherwell Effects Recorded)</b>		
7. To conserve and enhance and create resources for biodiversity.	<ol style="list-style-type: none"> <li>1. Will it, protect, enhance or restore a locally or nationally designated site of nature conservation importance (including those in Oxford that may be affected by new development in Cherwell)?</li> <li>2. Will it assist Cherwell District Council's Biodiversity Action Plan (BAP) and/or the Oxfordshire BAP achieve its targets?</li> <li>3. Will it conserve or enhance biodiversity assets or create new habitats?</li> <li>4. Will it minimise the fragmentation of existing habitats and enhance, restore or create networks of habitats?</li> <li>5. Will it conserve and enhance species diversity; and in particular avoid harm to protected species?</li> <li>6. Will it encourage protection of and increase the number of trees?</li> </ol>	Biodiversity, Fauna and Flora

SA Objective	Sub-Objective	SEA Topic
8. To protect and enhance landscape character and quality and make accessible for enjoyment, the countryside.	<ol style="list-style-type: none"> <li>1. Will it protect, enhance and restore the District's natural environment assets (e.g. the countryside, parks and green spaces, common land, woodland and forest reserves, AONBs etc.)?</li> <li>2. Will it promote the accessibility of the District's countryside in a sustainable and well-managed manner?</li> <li>3. Will it improve the landscape, ecological quality and character of open spaces?</li> <li>4. Will it enhance the townscape and public realm?</li> <li>5. Will it prevent coalescence between settlements?</li> </ol>	Landscape, Biodiversity, Flora and Fauna
9. To protect, enhance and make accessible for enjoyment, the historic environment.	<ol style="list-style-type: none"> <li>1. Will it protect, enhance and restore Cherwell's cultural and heritage assets (e.g. World Heritage Sites, Scheduled Ancient Monuments, Listed Buildings, Historic Parks and Gardens and Conservation Areas) and the setting of historic Oxford?</li> <li>2. Will it promote the accessibility of the District's historic environment in a sustainable and well-managed manner?</li> <li>3. Will it help preserve and record archaeological features?</li> </ol>	Cultural Heritage, including architectural and archaeological heritage
11. To maintain and improve the water quality of rivers and to achieve sustainable water resources management.	<ol style="list-style-type: none"> <li>1. Will it improve the water quality of the District's rivers and inland water?</li> <li>2. Will it enable recycled water to be used?</li> <li>3. Will it promote sustainable water resource management, provision of new facilities/ infrastructure or water efficient measures?</li> </ol>	Water, Biodiversity, Fauna and Flora
12. To reduce the risk of flooding and resulting detriment to public wellbeing, the economy and the environment.	<ol style="list-style-type: none"> <li>1. Will it reduce the risk of flooding from rivers, watercourses and sewer flooding to people and property?</li> <li>2. Will it result in inappropriate development in the flood plain?</li> <li>3. Will it increase the provision of sustainable drainage in new developments?</li> </ol>	Water, Soil, Climatic Factors and Human Health
13. To improve efficiency in land use through the re-use of previously developed land and existing buildings and encouraging urban renaissance.	<ol style="list-style-type: none"> <li>1. Will it maximise the provision of housing development on previously developed land as opposed to greenfield sites?</li> <li>2. Will it maximise the provision of employment development on previously developed land as opposed to greenfield sites?</li> <li>3. Will it maximise housing densities to make efficient use of land?</li> <li>4. Will it ensure land is remediated where appropriate?</li> <li>5. Will it reduce the loss of soil and high grade agricultural land to development?</li> </ol>	Soil, Climatic Factors
14. To reduce the global, social and environmental impact of consumption of resource by using sustainably produced and local products.	<ol style="list-style-type: none"> <li>1. Will it promote the adoption of sustainable design in construction practices and the use of recycled materials?</li> <li>2. Will it promote the use of locally and sustainably sourced, and recycling of materials in construction and renovation?</li> <li>3. Will it lead to an increase in the proportion of energy needs being met from renewable sources?</li> <li>4. Will it promote the incorporation of small-scale renewable in developments?</li> </ol>	Climatic Factors



SA Objective	Sub-Objective	SEA Topic
15. To reduce waste generation and disposal, and achieve the sustainable management of waste.	1. Will it promote sustainable waste management practices through a range of waste management facilities? 2. Will it reduce hazardous waste? 3. Will it increase waste recovery and recycling?	Soil and Climatic Factors

## Habitats Regulations Assessment

- 2.9 The Partial Review was also required to be subject to Habitats Regulations Assessment (HRA) under the Conservation of Habitats and Species Regulations 2017 (as amended) (and previous versions of these Regulations, as applicable at the time of preparing each stage of the HRA). The purpose of HRA is to assess the impacts of a land-use plan against the conservation objectives of a European designated site for nature conservation and to ascertain whether it would adversely affect the integrity of that site. The HRA process for the Partial Review was undertaken separately from the SA by Atkins on behalf of Cherwell District Council, but the findings of the HRA Reports informed the SA process, particularly in relation to judging the potential effects on SA objective 7 (biodiversity).
- 2.10 The HRA Addendum considering the Main and Minor Modifications to the Proposed Submission Cherwell Local Plan Part 1 Partial Review (September 2019) concluded that the Main and Minor modifications did not change the findings and conclusions of the HRA Stage 1 and Stage 2 Appropriate Assessment of the Proposed Submission Plan (August 2018). This original Appropriate Assessment concluded that the Cherwell Local Plan Part 1 Partial Review would not have an adverse effect on the integrity of Oxford Meadows SAC either alone or in-combination with other projects and plans.

### 3 How the Environmental Report Has Been Taken into Account

- 3.1 As explained above, the SA process for the Cherwell Local Plan Partial Review was undertaken iteratively with the SA Report and associated Addenda informing the Plan. As part of the SA process an assessment of the sustainability and environmental effects was made at each stage of the Plan's development.
- 3.2 The SA assessed all policies and proposals in each iteration of the Partial Review and their reasonable alternatives, including all modifications to the Plan following publication of the Proposed Submission Document in June 2017. This helped the Council to formulate its approach with regards to which options to take forward, alongside other material planning considerations.
- 3.3 **Table 3.1** shows how preparation of the SA Reports (which included the Environmental Report requirements) corresponded with each stage of the Plan preparation, and how the SA was taken into account.

**Table 3.1 Iterations of the Local Plan Part 1 Review and accompanying SA outputs**

Plan Iteration	Accompanying SA Work	How SA Report was taken into account
Cherwell Local Plan Part 1 Partial Review Issues Consultation (January 2016)	Cherwell Local Plan Part 1 Partial Review SA Scoping Report (January 2016)	The scoping stage of the SA involved compiling baseline information about the social, economic and environmental issues for the plan area as well as the policy context (involving a review of plans, policies and programmes (PPPs)) and key sustainability issues. The SA framework was then developed, setting out the SA objectives against which plan options were appraised. The latest information relating to these matters is contained within the final SA Report.
Cherwell Local Plan Part 1 Partial Review Options Paper (November 2016)	Cherwell Local Plan Part 1 Partial Review Initial SA Report (November 2016)	The SA assessed options for a range of key issues discussed in the Options document, including the Vision and Strategic Objectives, nine areas of search within the District of Cherwell within which additional growth to meet a proportion of Oxford’s unmet housing need could be accommodated, three quanta of growth to accommodate a proportion of Oxford’s unmet housing need and site options identified within areas of search A and B. The SA results (among other evidence) helped to guide the Council in identifying how best to address the issues identified, culminating in the options proposed to be taken forward in the Proposed Submission document (see below).
Cherwell Local Plan Part 1 Partial Review Proposed Submission (July 2017)	Cherwell Local Plan Part 1 Partial Review Proposed Submission SA Report (June 2017)	<p>The 2017 Proposed Submission SA Report reviewed and updated the options appraisal findings included within the Initial SA Report (2016) before then appraising the policies in the Partial Review Proposed Submission Plan. These updates were made to reflect additional evidence. In general, the options and policy approaches that were taken forward in the Plan were those that performed more positively or at least as well against the SA objectives than the rejected options, although in a small number of cases other planning considerations determined that other options should be taken forward.</p> <p>During the development of the Partial Review Proposed Submission policies, LUC appraised draft versions, highlighted their potential for significant effects and made recommendations on how the policies could be improved. Paragraphs 10.383 and 10.384 of the June 2017 SA Report set out the SA recommendations made and the Council’s subsequent amendments to the Plan’s policies. Notable amendments made to the Partial Review Proposed Submission policies include requirements for allocations to:</p> <ul style="list-style-type: none"> <li>• avoid areas of flood zone 2 and 3;</li> <li>• incorporate design principles that respond to the landscape, openness of the Green Belt and historic setting of Oxford;</li> <li>• include measures for minimising the impact of motor vehicles on new residents and existing communities; and</li> <li>• encourage sustainable and safe waste management.</li> </ul>
Cherwell Local Plan Part 1 Partial Review Proposed Focused Changes and Minor Modifications (February 2018)	Cherwell Local Plan Part 1 Partial Review SA Addendum – Proposed Changes (February 2018)	The February 2018 SA Addendum appraised a series of Focused Changes and Minor Modifications to the Proposed Submission Plan and was submitted with the suite of documents for Examination in February 2018. The proposed changes were appraised and were not considered to generate any new negative effects. The 2018 SA Addendum concluded that the proposed changes either did not change, or contributed positively to the effects identified through the SA of the Partial Review Proposed Submission Plan as recorded in the June 2017 SA Report. Therefore, no further SA recommendations were considered necessary.
Schedule of Proposed Main Modifications to the Partial Review of the Cherwell Local Plan (November 2019)	Cherwell Local Plan Part 1 Partial Review SA Addendum – Main Modifications (September 2019)	Following the Examination hearings and receipt of the Inspector’s advice note, Cherwell District Council prepared a schedule of modifications, including Main Modifications, to the Proposed Submission Local Plan Review. All modifications were subject to SA and the 2019 SA Addendum found that although there would be negative effects associated with some of the recommended Main Modifications, the significance of these adverse effects did not change the overall cumulative effects of the Proposed Submission Plan as a whole. In light of these overall findings

Plan Iteration	Accompanying SA Work	How SA Report was taken into account
		and the existing recommendations made through the course of the SA and the wider plan-making process, no further SA recommendations were considered necessary.
Adopted Cherwell Local Plan Partial Review (September 2020)	SA Adoption Statement (August 2020)	<p>This adoption statement summarises the SA process and how this has influenced the Partial Review.</p> <p>Following consultation on the Main Modifications and the associated SA Addendum, the Inspector's Report concluded that with the inclusion of the recommended modifications the Plan satisfies the requirements of Section 20 (5) of the Planning and Compulsory Purchase Act 2004 and meets the criteria for soundness in the National Planning Policy Framework. No further SA work was required following the publication of this report.</p>

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## 4 How Opinions of Consultation Bodies and the Public Have Been Taken into Account

- 4.1 At each stage of the Cherwell Local Plan Partial Review's development, an SA Report was published alongside the Plan document for consultation with the public and the consultation bodies specifically referred to in the SEA Regulations (i.e. Historic England, the Environment Agency and Natural England). The SEA Regulations require that the SEA Adoption Statement provides an account of how any opinions expressed by the public and the consultation bodies have been taken into account.
- 4.2 The Partial Review consultation stages and responses received relating to the SA documents are summarised below. The summaries of and responses to all consultation comments received at each stage of the SA are set out in the October 2016 Initial SA Report, the Proposed Submission SA Report (June 2017), the February 2018 SA Addendum and in the Council report on the Partial Review Modifications of 24 February 2020. The Council's Consultation Statement also explains how representations in relation to the Partial Review have been taken into account.

### SA Scoping Report (January 2016)

- 4.3 The SA Scoping Report was published alongside the Local Plan Review Issues Paper for consultation with the statutory consultees in January 2016 for a six week period.
- 4.4 This provided an opportunity for consultees to comment on the proposed scope of the SA, including whether the objectives in the SA framework provided a reasonable framework for assessing the likely significant effects of the Plan Review and whether the review of relevant international and national Plans, Policies and Programmes (the 'PPP' review) and baseline information were appropriate and complete.
- 4.5 Consultation responses were received from all three of the statutory consultees. Comments related to requests for minor alterations to the described key sustainability issues for Cherwell and associated changes to related SA objective wording, as well as references to additional baseline information and relevant PPP review information that should be included.
- 4.6 All comments received were reviewed and taken into account prior to the appraisal of any Plan policy and proposal options during the subsequent iteration of the SA, and summarised in the Initial SA Report (October 2016). Appropriate suggested amendments were made in the Initial SA Report, but where any were not taken forward, a clear justification was included within the consultation response Table A3.3 in Appendix 3 of the Initial SA Report.

### Initial SA Report (October 2016)

- 4.7 An Initial SA Report was published for public consultation alongside the Council's Options Paper in November 2016 to January 2017.
- 4.8 Consultation comments relating to the SA Report were received from over 100 organisations, developers or members of the general public. Most comments raised questions, support or criticisms of the judgements made in determining the effects of specific options, and the evidence used to make them. Where consultation comments suggested the use of evidence that could be applied consistently to all options appraised, this was taken into account. For example, in response to comments requesting some SA judgements be informed by more detailed evidence, including from Natural England and Historic England, the effect judgements associated with the appraisal of site options against SA objectives 7 (biodiversity) 8 (landscape) and 9 (historic environment) were updated to reflect the findings of site-based sensitivity assessments

undertaken for each reasonable site option as part of the Council's Nature Conservation Assessments and Landscape Character Sensitivity and Capacity Assessment.

- 4.9 All comments received were reviewed and taken into account prior to the appraisal of the Proposed Submission Plan policies and proposal options and summarised in the Proposed Submission Partial Review SA Report (June 2017). Clear justification for where comments were or were not taken forward in the SA was provided within the consultation response Table A3.2 in Appendix 3 of the Proposed Submission SA Report.

#### **Proposed Submission SA Report (June 2017)**

- 4.10 The Proposed Submission SA Report was published for consultation alongside the Proposed Submission Local Plan Partial Review in July 2017.
- 4.11 Consultation comments were received from over 50 organisations, developers or members of the general public, although the three statutory consultees made no further comment on the SA process. Most comments were similar to those received during the consultation on the Initial SA Report, raising questions, support or criticisms of the judgements made in determining the effects of specific options, and the evidence used to make them.
- 4.12 All comments received were reviewed and taken into account and are summarised in Table A1 in Appendix 1 of the SA Addendum (February 2018). No updates to the Proposed Submission SA Report (June 2017) were considered necessary following this consultation.

#### **SA Addendum – Proposed Focused Changes (February 2018)**

- 4.13 This SA Addendum was submitted alongside the Submission Plan for Examination. Its contents were considered alongside the Proposed Submission SA Report (June 2017) and the Proposed Submission Partial Review (July 2017) throughout the public hearing sessions.

#### **Main Modifications SA Addendum (September 2019)**

- 4.14 Following the Examination hearings in February 2019 and receipt of the Inspector's advice note, a final SA Addendum (September 2019) was prepared and published for public consultation alongside the Council's schedule of Modifications in November and December 2019. The modifications to the Plan, including Main Modifications, were subject to SA alongside their reasonable alternatives.
- 4.15 Consultation comments were received from over 90 organisations, developers or members of the general public. The three statutory consultees made no comments on the SA process at this final stage. Most comments were similar to those received during the consultation on the previous iterations of the SA, raising questions, support or criticisms of the judgements made in determining the effects of the Proposed Submission Plan, its modifications, the reasonable alternatives and the evidence used to make them. Annex 1 of the Council's Statement of Consultation (February 2020) summarises all the consultation comments received and sets out responses to each comment. The consultation comments and responses, Main Modifications Schedule (November 2019) and accompanying SA Addendum (September 2019) were then sent to the Inspector for consideration in preparing the Inspector's report.

## 5 Why the Adopted Local Plan Part 1 Partial Review was Chosen in Light of the Other Reasonable Alternatives Dealt With

- 5.1 The options or reasonable alternatives considered by the Council during the preparation of the Partial Review included strategic options regarding what the scale and distribution of additional growth should be, as well as policy options, covering specific development management issues and site options for development.
- 5.2 Information considered by the Council before final decisions were made included:
- SA findings, particularly the significant effects generated by each option;
  - the Partial Review's revised vision and strategic objectives;
  - results of consultation and engagement with the general public and key stakeholders; and
  - the evidence base for the Partial Review
- 5.3 The options considered for the Partial Review are described below alongside a summary of the Council's reasons why the preferred options were selected over the reasonable alternatives. More detailed reasoning on why individual options were selected and not selected can be found in the appraisal finding chapters of the Proposed Submission SA Report (June 2017) and the final SA Addendum (September 2019).

### Vision and Strategic Objectives

- 5.4 The Council's Options Paper (October 2016) contained a draft revised vision and set of strategic objectives for the Partial Review. The initial drafts were prepared in light of the Partial Review's focus on contributing to meeting some of the shortfall in Oxford's housing needs and the challenges and opportunities facing the District. The draft vision and strategic objectives were changed in light of the SA findings on the draft versions, other plan evidence and consultation. The changes resulted in overall improvements in the SA's conclusions on the significant effects of the vision and strategic objectives. The final version of the Vision and Objectives are contained within the adopted Partial Review.

### Areas of Search

- 5.5 Nine areas of search as options for locating additional growth covering the whole District were considered:
- Option A – Kidlington & Surrounding Area.
  - Option B – North & East of Kidlington.
  - Option C – Junction 9, M40.
  - Option D – Arncott.
  - Option E – Bicester and Surrounding Area.
  - Option F – Former RAF Upper Heyford & Surrounding Area.
  - Option G – Junction 10, M40.
  - Option H – Banbury & Surrounding Area.
  - Option I – Remainder of District / Rural Dispersal.

- 5.6 Areas of search A and B were selected as the most appropriate locations within which to identify specific site options for delivering growth within the Plan period partly due to the fact that they generally performed better in sustainability terms compared to the alternatives, as follows:
- Proximity to Oxford, the existing availability of public transport and the opportunity to maximise the use of sustainable and affordable transport in accessing Oxford's key employment areas and services and facilities.
  - Opportunity to achieve an overall, proportionate reduction in reliance on the private motor vehicle in accessing Oxford's key employment areas and services and facilities and to achieve further investment in sustainable transport infrastructure.
  - Deliverability of sustainable transport improvements in comparison to other Areas of Search.
  - Relationship of existing communities to Oxford.
  - Existing economic relationship between the Areas of Search and Oxford.
  - Opportunity to provide affordable homes to meet Oxford's identified need close to the source of that need.
- 5.7 Further details on the Council's reasoning can be found at the end of Chapter 7 in the Partial Review Proposed Submission SA Report (June 2017), specifically paragraphs 7.89 to 7.91.

### **Quantum of Additional Growth to be Accommodated within the Plan Period**

- 5.8 Three growth options were appraised:
- 4,400 homes.
  - Significantly less than 4,400 homes.
  - Significantly more than 4,400 homes.
- 5.9 4,400 homes was selected as the scale of growth to plan for within the Plan in light of the findings of the SA, the Oxfordshire Growth Board, which originally apportioned this scale of growth to Cherwell District in September 2016, and the Council's duty to cooperate.
- 5.10 Further details on the Council's reasoning can be found at the end of Chapter 8 in the Partial Review Proposed Submission SA Report (June 2017), specifically paragraphs 8.81 and 8.82.

### **Site Options within Areas of Search A and B**

- 5.11 Thirty-eight site options were originally appraised, followed by an additional four after consultation on the initial options paper in November 2016. Of the 42 site options considered and appraised through the SA, 11 were taken forward (either fully or partially) for allocation across eight site allocation policies:
- Full allocation of site 20a – Begbroke Science Park.
  - Full allocation of site 22 – Land North West of Oxford Airport, near Woodstock.
  - Partial allocation of site 25 – Land East of Marlborough School, Woodstock.
  - Full allocation of site 49 – Land at Stratfield Farm, Oxford Road, Kidlington.
  - Partial allocation of site 51 – Land to West of A44/Rutten Lane, North of Cassington Road, surrounding Begbroke Wood.
  - Partial allocation of site 38 – North Oxford Triangle, Kidlington.
  - Partial allocation of site 39A – Frieze Farm.
  - Full allocation of Site 123 – Land to South of A34, North of Linkside Avenue, Wolvercote.
  - Full allocation of site 126 – Seedlake Piggeries, Yarnton.
  - Full allocation of site 178 – Land east of Kidlington and west of the A34.



- Full allocation of site 202 – Land adjacent to Bicester Road, Gosford, Kidlington.
- 5.12 The Council concluded that these sites would provide the best way of meeting the Plan’s vision and objectives and achieving sustainable development, drawing on the SA and other evidence, such as the transport, landscape and Green Belt studies. Further details on the reasons why specific sites were selected and not selected can be found in Chapter 10 of the Proposed Submission SA Report (June 2017), specifically paragraphs 10.07 to 10.192.
- 5.13 The Proposed Submission Local Plan Part 1 Review contained 18 policies all of which were subjected to SA:
- Ten strategic planning policies:
    - Policy PR1 – Achieving Sustainable Development for Oxford.
    - Policy PR2 – Housing Mix, Tenure and Size.
    - Policy PR3 – The Oxford Green Belt.
    - Policy PR4a – Sustainable Transport.
    - Policy PR4b – Kidlington Centre.
    - Policy PR5 – Green Infrastructure.
    - Policy PR11 – Infrastructure Delivery.
    - Policy PR12a – Delivering Sites and Maintaining Housing Supply.
    - Policy PR12b – Applications for Planning Permission for the Development of Sites Not Allocated in the Partial Review.
    - Policy PR13 – Monitoring and Securing Delivery.
  - Eight site allocation policies:
    - Policy PR6a – Land East of Oxford Road.
    - Policy PR6b – Land West of Oxford Road.
    - Policy PR6c – Land at Frieze Farm.
    - Policy PR7a – Land South East of Kidlington.
    - Policy PR7b – Land at Stratfield Farm.
    - Policy PR8 – Land East of the A44.
    - Policy PR9 – Land West of Yarnton.
    - Policy PR10 – Land South East of Woodstock.
- 5.14 The contents of these policies were determined based on the policies in the adopted Cherwell Local Plan Part 1 (where relevant), changes to the Local Plan’s vision and strategic objectives, the SA findings of initial draft policies and representations received from consultees.

### **Main Modifications to the Local Plan Part 1 Partial Review**

- 5.15 Following Examination hearings in February 2019, the Inspector published an advice note in July 2019 setting out his preliminary conclusions. The Inspector found site allocation Policy PR10 – Land South East of Woodstock unsound due to the impact it would have on the countryside and setting of Woodstock, as well as the Blenheim Palace World Heritage Site and its travel distance to Oxford. This gave rise to the need to consider alternative locations for accommodating the 410 dwellings originally allocated through PR10.
- 5.16 Eighteen alternative locations were identified for consideration amongst the allocations, considering the reconfiguration, densification and expansion of sites as appropriate, and were all

subject to SA as presented in the second SA Addendum (2019). The 410 dwellings were subsequently reallocated amongst the following allocations:

- Policy PR6a – Land East of Oxford Road.
- Policy PR6b – Land West of Oxford Road.
- Policy PR7a – Land South East of Kidlington.
- Policy PR7b – Land at Stratfield Farm.
- Policy PR9 – Land West of Yarnton.

5.17 These sites were selected over the alternatives based on the findings of the SA and other evidence considering the capacity of each site to accommodate additional development and further sensitivity testing relating to the impact of densification and expansion on the wider landscape.

5.18 A full schedule of Main Modifications to the Plan was prepared for public consultation including an accompanying SA Addendum (September 2019) appraising the effects of the Main Modifications and their reasonable alternatives. Further information is provided in the SA Addendum and the Council's Explanatory Note. The Modifications took into account matters raised during the Examination by the Inspector and participating representors. The SA found that although there would be negative effects associated with some of the recommended Main Modifications, the significance of these adverse effects did not change the overall cumulative effects of the Proposed Submission Local Plan as a whole, with the majority of the Main Modifications resulting in no additional effects, or contributing to positive effects already presented in the Proposed Submission SA Report (June 2017).

## 6 How the Significant Environmental Effects of the Implementation of the Local Plan Part 1 Partial Review Will Be Monitored

- 6.1 The SEA Regulations require that “*The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action*” (Regulation 17), and that the Environmental Report should provide information on “*a description of the measures envisaged concerning monitoring*” (Schedule 2).
- 6.2 The Planning Practice Guidance (PPG) on SA states that it is not necessary to monitor everything and monitoring should be focused on the significant sustainability effects, including significant effects where there is uncertainty and where monitoring would enable preventative or mitigation measures to be taken. However, in order to address the requirement in SEA Regulation 17 noted above to “*identify unforeseen adverse effects at an early stage and be able to undertake appropriate remedial action*”, the Council has established comprehensive measures to monitor sustainability effects for all the objectives in the SA framework.
- 6.3 **Table 6.1** shows the indicators to be used by Cherwell District Council to monitor the potential sustainability effects of implementing the Plan.

**Table 6.1 Proposed monitoring indicators for monitoring the effects of the Local Plan Part 1 Review**

SA Objective	Suggested indicators (and relevant Policy References)
<b>SA Objectives related to meeting Oxford’s Needs</b>	
1. To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home.	<ul style="list-style-type: none"> <li>Annual housing commitments and completions that meet the needs of Oxford City. (Policies PR1, PR12a, PR12b and PR13).</li> <li>Net affordable housing completions/acquisitions per tenure that specifically meet the needs of Oxford City. (Policies PR1, PR2, PR12a, PR12b and PR13).</li> <li>Number of 'extra care' completions that meet the needs of Oxford City. (Policies PR1, PR2, PR12a, PR12b and PR13).</li> </ul>
16. To ensure high and stable levels of employment so everyone can benefit from the economic growth of the District and Oxford and Oxfordshire.	<ul style="list-style-type: none"> <li>Employment commitments and completions on allocated employment land in Cherwell and Oxford (Policy PR1).</li> <li>Employment commitments and completions on non-allocated employment land in Cherwell and Oxford (Policy PR1).</li> <li>Completions resulting in a loss of employment use to non-employment use in Cherwell and Oxford (Policy PR1).</li> </ul>
17. To sustain and develop economic growth and innovation, an educated/ skilled workforce and support the long term competitiveness of the District and Oxford and Oxfordshire.	<ul style="list-style-type: none"> <li>Kidlington centre and Oxford City centre use (use classes A1-A5, B1a, D2) (Policy PR1).</li> <li>No. of retail impact assessments submitted with planning applications in Cherwell and Oxford (Policy PR1).</li> </ul>
<b>SA objectives with particular spatial relevance to Oxford</b>	
3. To reduce poverty and social exclusion.	<ul style="list-style-type: none"> <li>Completed development per land use: housing, employment, retail, etc. (Policies PR1, PR2, PR4a, PR4b and PR6a-PR10).</li> </ul>

SA Objective	Suggested indicators (and relevant Policy References)
6. To improve accessibility to all services and facilities.	<ul style="list-style-type: none"> <li>• Completed education infrastructure (Policies PR1 and PR6a-PR10).</li> <li>• Completed health care infrastructure (Policies PR1 and PR6a-PR10).</li> <li>• Amount, type and location of open space/sport/recreation facilities (Policies PR1, PR5 and PR6a-PR10).</li> <li>• Areas deficient in recreation provision by type and amount (Policies PR1, PR5 and PR6a-PR10).</li> <li>• Completed built development on (former) sites of open space, outdoor sport and recreation (Policies PR1, PR5 and PR6a-PR10).</li> <li>• Completed community facilities infrastructure (Policy Policies PR1 and PR6a-PR10).</li> <li>• Access to services and facilities by public transport, walking and cycling (Policies PR1, PR4a, PR4b, PR6a-PR10 and PR11).</li> <li>• Completed green infrastructure schemes (Policies PR1, PR5 and PR6a-PR10).</li> </ul>
10. To reduce air pollution (including greenhouse gas emissions) and road congestion.	<ul style="list-style-type: none"> <li>• Carbon emissions in Cherwell and the City of Oxford per capita (Policy PR1).</li> <li>• Access to services and facilities by public transport, walking and cycling (Policies PR1, PR4a, PR4b, PR6a-PR10 and PR11).</li> <li>• Completed transport improvement schemes (Policies PR1, PR4a, PR4b, PR6a-PR10 and PR11).</li> <li>• Number of Energy Statements submitted (Policy PR1).</li> <li>• Number of District Heating Feasibility Assessments submitted (Policy PR1).</li> <li>• Number of permitted district heating schemes in the district (Policy PR1).</li> <li>• Permitted renewable energy capacity per type (Policy PR1).</li> </ul>
<b>Other Social and Economic SA objectives</b>	
2. To improve the health and wellbeing of the population & reduce inequalities in health.	<ul style="list-style-type: none"> <li>• Completed health care infrastructure (Policies PR1 and PR6a-PR10).</li> <li>• Amount, type and location of open space/sport/recreation facilities (Policies PR1, PR5 and PR6a-PR10).</li> <li>• Areas deficient in recreation provision by type and amount (Policies PR1, PR5 and PR6a-PR10).</li> <li>• Open spaces in the district meeting quality standards (Policies PR1, PR5 and PR6a-PR10).</li> <li>• Completed green infrastructure schemes (Policies PR1, PR5 and PR6a-PR10).</li> </ul>
4. To reduce crime and disorder and the fear of crime.	<ul style="list-style-type: none"> <li>• Crime levels in Cherwell District (Policy PR1).</li> </ul>
5. To create and sustain vibrant communities.	<ul style="list-style-type: none"> <li>• Permissions granted contrary to design consultee advice on design grounds (Policies PR1, PR5 and PR6a-PR10).</li> </ul>
<b>Environmental SA objectives</b>	
7. To conserve and enhance and create resources for biodiversity.	<ul style="list-style-type: none"> <li>• Number of permissions granted contrary to consultee (Environment Agency, BBOWT, CDC/OCC etc.) advice on water</li> </ul>

SA Objective	Suggested indicators (and relevant Policy References)
	<p>quality grounds within the SAC catchment (Policies PR1, PR5 and PR6a-PR10).</p> <ul style="list-style-type: none"> <li>• Total Local Wildlife Site/Local Geological Site area (Policies PR1, PR5 and PR6a-PR10).</li> <li>• Changes in priority habitats by number &amp; type (Policies PR1, PR5 and PR6a-PR10).</li> <li>• Changes in priority species by number &amp; type (Policies PR1, PR5 and PR6a-PR10).</li> <li>• Ecological condition of SSSIs (Policies PR1, PR5 and PR6a-PR10).</li> <li>• Distribution and status of farmland birds (Policies PR1, PR5 and PR6a-PR10).</li> <li>• Distribution and status of water voles (Policies PR1, PR5 and PR6a-PR10).</li> <li>• Permissions granted contrary to tree officer advice (Policies PR1, PR5 and PR6a-PR10).</li> <li>• Permissions granted contrary to biodiversity consultee advice (Policies PR1, PR5 and PR6a-PR10).</li> <li>• Number of Ecological Surveys submitted with applications (Policies PR1, PR5 and PR6a-PR10).</li> <li>• Local Sites in Positive Conservation Management (Policies PR1, PR5 and PR6a-PR10).</li> <li>• Total amount of Natural Environment and Rural Communities (NERC) Act s41 Habitats of Principal Importance within active Conservation Target Areas (CTAs) (Policies PR1, PR5 and PR6a-PR10).</li> <li>• Permissions granted in Conservation Target Areas contrary to biodiversity consultee advice (Policies PR1, PR5 and PR6a-PR10).</li> <li>• Completed green infrastructure schemes (Policies PR1, PR5 and PR6a-PR10).</li> </ul>
<p>8. To protect and enhance landscape character and quality and make accessible for enjoyment, the countryside.</p>	<ul style="list-style-type: none"> <li>• Number and location of urban fringe restoration/improvement schemes completed (Policies PR1, PR5 and PR6a-PR10).</li> <li>• Permissions granted contrary to Landscape Officer advice (Policies PR1, PR5 and PR6a-PR10).</li> <li>• Permissions granted contrary to design consultee advice on design grounds (Policies PR1, PR5 and PR6a-PR10).</li> </ul>
<p>9. To protect, enhance and make accessible for enjoyment, the historic environment.</p>	<ul style="list-style-type: none"> <li>• Permissions granted contrary to the advice of Historic England/consultee advice on heritage grounds (Policies PR1, PR5 and PR6a-PR10).</li> <li>• Number of new (and reviews of) conservation area appraisals (Policies PR1, PR5 and PR6a-PR10).</li> <li>• Completed green infrastructure schemes (Policies PR1, PR5 and PR6a-PR10).</li> </ul>
<p>11. To maintain and improve the water quality of rivers and to achieve sustainable water resources management.</p>	<ul style="list-style-type: none"> <li>• % of new dwellings completed achieving water use below 110 litres/person/day (Policy PR1).</li> <li>• Completed SuDS schemes in the district (Policies PR1, PR5 and PR6a-PR10).</li> <li>• Number of permissions granted contrary to Environment Agency advice on water quality grounds (Policies PR1, PR5 and PR6a-PR10).</li> <li>• Number of permissions granted contrary to consultee (Environment Agency, BBOWT, CDC/OCC etc.) advice on water</li> </ul>

SA Objective	Suggested indicators (and relevant Policy References)
	quality grounds within the SAC catchment (Policies PR1, PR5 and PR6a-PR10).
12. To reduce the risk of flooding and resulting detriment to public well-being, the economy and the environment.	<ul style="list-style-type: none"> <li>• Permissions granted contrary to Environment Agency advice on Flood Risk grounds (Policies PR1, PR5 and PR6a-PR10).</li> <li>• Flood Risk Assessments received for development proposals within Flood Zones 2 &amp; 3, within 1 ha of Flood Zone 1, or 9m of any watercourse (Policies PR1, PR5, PR6a-PR10, PR11, PR12b and PR13).</li> <li>• Completed SuDS schemes in the district (Policies PR1, PR5 and PR6a-PR10).</li> </ul>
13. To improve efficiency in land use through the re-use of previously developed land and existing buildings and encouraging urban renaissance.	<ul style="list-style-type: none"> <li>• % of residential completions on previously developed land (Policies PR1, PR5 and PR6a-PR10).</li> <li>• Net housing density of completions (Policies PR1, PR5 and PR6a-PR10).</li> <li>• Completed development (per type) in the Green Belt (Policies PR1, PR3, PR5 and PR6a-PR10).</li> <li>• Permissions granted contrary to design consultee advice on design grounds (Policies PR1, PR5 and PR6a-PR10).</li> </ul>
14. To reduce the global, social and environmental impact of consumption of resource by using sustainably produced and local products.	<ul style="list-style-type: none"> <li>• Completed non-residential development achieving BREEAM Very Good, BREEAM Excellent (Policies PR1 and PR2).</li> </ul>
15. To reduce waste generation and disposal, and achieve the sustainable management of waste	<ul style="list-style-type: none"> <li>• % of household waste sent for re-use, recycling and compost. (Policy PR1)</li> <li>• % of Construction and demolition waste re-used. (Policy PR1)</li> </ul>

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