



www.landuse.co.uk

Cherwell Local Plan 2011-2031 Part 1

SA/SEA Adoption Statement

Prepared by LUC
July 2015

Planning & EIA
Design
Landscape Planning
Landscape Management
Ecology
Mapping & Visualisation

LUC LONDON
43 Chalton Street
London NW1 1JD
T 020 7383 5784
F 020 7383 4798
london@landuse.co.uk

Offices also in:
Bristol
Glasgow
Edinburgh



FS 566056
EMS 566057

Land Use Consultants Ltd
Registered in England
Registered number: 2549296
Registered Office:
43 Chalton Street
London NW1 1JD

LUC uses 100% recycled paper

Project Title: Sustainability Appraisal/Strategic Environmental Assessment of the Cherwell Local Plan 2011-2031 Part 1

Client: Cherwell District Council

Version	Date	Version Details	Prepared by	Checked by	Approved by
1	25/06/15	Draft SA/SEA Adoption Statement for the Cherwell Local Plan Part 1	Josh Allen & Taran Livingston	Taran Livingston	Taran Livingston
2	06/07/15	Complete draft SA/SEA Adoption Statement for the Cherwell Local Plan Part 1	Josh Allen & Taran Livingston	Taran Livingston	Taran Livingston
3	09/07/15	Final version of SA/SEA Adoption Statement for the Cherwell Local Plan 2011-2031 Part 1	Josh Allen & Taran Livingston	Taran Livingston & Jeremy Owen	Taran Livingston

Contents

1	Introduction	1
	Requirement for the Adoption Statement	1
2	How environmental and sustainability considerations have been integrated into the Local Plan Part 1	3
3	How the Environmental/SA Report has been taken into account	9
4	How opinions of consultation bodies and the public have been taken into account	15
5	Why the adopted Local Plan Part 1 was chosen in light of reasonable alternatives	22
6	How will the environmental and sustainability effects of the Local Plan Part 1 be monitored?	33

Tables

Table 2.1	SA Framework for the Cherwell Local Plan Part 1 (as amended for the 2014 SA Addendum work)	4
Table 2.2	Coverage of SEA topics by SA Objectives for the Cherwell Local Plan Part 1	8
Table 3.1	Stages of Local Plan Part 1 preparation and corresponding SA stages plus how the SA Reports have been taken into account	10
Table 6.1	Proposed monitoring indicators for monitoring the effects of the Local Plan Part 1 on the SA objectives	34

1 Introduction

- 1.1 Cherwell District Council adopted the Cherwell Local Plan 2011-2031 Part 1 on 20th July 2015.
- 1.2 During the preparation of Part 1 of the Local Plan, the District 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 Cherwell Local Plan 2011-2031 Part 1 during its development.
- 1.3 Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations (2012) requires Cherwell District Council to make the final SA Report available alongside the Adopted Local Plan Part 1.
- 1.4 The final SA Report for the Adopted Local Plan Part 1 comprises the following documents:
 - The **December 2013 SA Report** prepared by Environ on behalf of the Council, was consulted upon alongside the Pre-Submission version of the Cherwell Local Plan Part 1. The SA Report was then submitted to the Secretary of State for Examination on the 31 January 2014. The examination hearings were suspended on 4 June 2014 for six months to enable the Council to put forward proposed modifications to the plan involving increased new housing delivery over the plan period to meet the full up to date, objectively assessed needs of the District, as required by the National Planning Policy Framework (NPPF) and based on the Oxfordshire Strategic Housing Market Assessment 2014 (SHMA).
 - The **October 2014 SA Addendum** was prepared by LUC on behalf of the Council, as part of the work on the proposed modifications requested during the Examination by the Inspector. The report is an Addendum to the full 2013 SA Report for the Cherwell Submission Local Plan, January 2014, and should be read alongside that report, as together they are intended to meet the requirements of the SEA Directive. The Addendum describes the options considered by Cherwell District Council following the hearing sessions in June 2014, which included options for the quantum of housing and employment development to be delivered as well as spatial options relating to how development should be distributed across the District. The options were subject to SA by LUC, and the findings informed Cherwell District Council's work on preparing Proposed Main Modifications to the Local Plan. The Addendum reports on the SA implications of the Main Modifications being proposed to the Local Plan, and highlights any differences from the Submission Local Plan.

Requirement for the Adoption Statement

- 1.5 In addition to the requirement in Regulation 26 of the Town and Country Planning (Local Planning) (England) Regulations (2012) for publishing the final SA Report alongside the Adopted Local Plan, the SEA Regulations¹ also require a number of steps to be taken upon adoption of a local plan (in this case the Local Plan Part 1). Specifically, SEA Regulation 16 sets out the post-adoption procedures for the SEA, and requires that, as soon as reasonably practicable after the adoption of a plan for which an SA/SEA has been carried out, the planning authority must make a copy of the plan publicly available alongside a copy of the SA report and an 'SEA adoption statement', and inform the public and consultation bodies about the availability of these documents. The consultation bodies are Historic England, Natural England and the Environment Agency. The SEA adoption statement must explain:
 - How environmental (and sustainability) considerations have been integrated into the plan.

¹ The Environmental Assessment of Plans and Programmes Regulations 2004 - SI No. 1633.

- How the Environmental Report (contained within the SA Report) has been taken into account during preparation of the plan.
- How the opinions expressed by the public, consultation bodies and where appropriate other European Member States, during consultation on the plan and Environmental/SA Report have been taken into account.
- The reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with.
- The measures that are to be taken to monitor the significant environmental and sustainability effects of the implementation of the plan.

1.6 As the SEA process was incorporated into the SA process, this document constitutes the SA/SEA Adoption Statement for the Cherwell Local Plan. The document is structured according to the SEA Regulation requirements listed above:

- **Section 2** summarises how environmental considerations have been integrated into the plan by explaining who carried out the SA/SEA and what assessment framework was used.
- **Section 3** summarises the links between the plan-making and SA/SEA processes and how the SA/SEA recommendations were taken into account.
- **Section 4** summarises the consultation opinions provided on the SA/SEA at each stage and describes what changes were made to the SA/SEA process in response to these comments.
- **Section 5** describes the alternatives/options considered as part of the Local Plan preparation process, and why certain options were chosen.
- **Section 6** describes how the significant sustainability/environmental impacts of the Local Plan will be monitored.

2 How environmental and sustainability considerations have been integrated into the Local Plan Part 1

- 2.1 The SA (incorporating SEA) of the Local Plan Part 1 was undertaken initially by Cherwell District Council (2005-2010) and then independently by consultants on behalf of Cherwell District Council. Between 2012 and 2013 the SA work was carried out by Environ. LUC was appointed in June 2014 to undertake some additional SA work that was required by the Inspector following the initial Examination hearings and supported the Council at the hearings. LUC has also prepared this SA Adoption Statement.
- 2.2 The purpose of the SA was to assist the District Council in preparing the Local Plan Part 1 by identifying the key sustainability/environmental issues facing the plan area, to predict what would be the likely effects of the Local Plan Part 1 on these issues, and to put forward recommendations to improve the Local Plan Part 1. The aim was to ensure that the Local Plan Part 1 has as many positive effects as possible and that any negative effects are avoided or mitigated as far as reasonably possible when the policies are implemented and result in new development within Cherwell.
- 2.3 The SA was undertaken iteratively, such that at each stage of the Local Plan Part 1's development an assessment of the sustainability and environmental effects of the options for the Local Plan Part 1 and subsequently its policies was made. SA Reports were produced to describe the approach taken, identify the effects and put forward recommendations to avoid or minimise negative effects identified or enhance positive effects. In this way, environmental and sustainability considerations were integrated into the Local Plan Part 1 as it was developed.
- 2.4 The way in which the environmental and sustainability effects of the Local Plan Part 1 were described, analysed and compared was through the use of a set of SA objectives. The SA objectives for the Local Plan Part 1 were developed by Cherwell District Council in collaboration with stakeholders, drawing on a review of relevant European, national and regional policies, plans and programmes and the objectives they contained. The resulting SA 'framework' comprised 19 SA objectives which were supported by a set of more detailed appraisal questions that were used to decide whether the Local Plan Part 1 would be likely to achieve each objective. The SA objectives covered all of the environmental topics required by the SEA Regulations.
- 2.5 The SA framework for the Local Plan Part 1 was originally presented in the 2005 SA Scoping Report (prepared at the time for the proposed Core Strategy document, which became the Local Plan Part 1) and included a set of SA objectives covering all of the SEA topics (listed in Schedule 2 of the SEA Regulations). This SA framework was the main tool used at each stage of the SA for assessing the likely effects of the options and policies for the Local Plan Part 1. A small number of minor changes were made to the SA framework to address some of the statutory consultation bodies' responses to the SA Addendum Scoping Consultation (June 2014). Using the same SA Framework ensured that alternatives were assessed in a comparable way to the options previously considered as part of developing the Cherwell Local Plan.
- 2.6 The SA framework for the Local Plan Part 1 (as amended for the 2014 SA Addendum) is shown in **Table 2.1** (underlined text shows where text was added to objectives following the SA Addendum Scoping consultation with statutory consultees).

Table 2.1 SA Framework for the Cherwell Local Plan Part 1 (as amended for the 2014 SA Addendum work)

SA Objective	Sub-Objective	SEA Topic
1. To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home.	<ol style="list-style-type: none"> 1. Will it contribute to the district housing requirements and completions and strategic housing requirements? 2. Will it increase the supply of affordable homes in urban and Health rural areas? 3. Will it contribute to providing additional homes for the homeless? 4. Will it reduce the percentage of unfit/ non-decent homes? 	Population and Human Health
2. To reduce the risk of flooding and resulting detriment to public well- being, the economy and the environment	<ol style="list-style-type: none"> 1. Will it reduce the risk of flooding from rivers, watercourses and sewer flooding to people and property? 2. Will it result in inappropriate development in the flood plain? 3. Will it increase the provision of sustainable drainage in new developments? 	Water and Soil, Climate Factors and Population and Human Health.
3. To improve the health and well-being of the population & reduce inequalities in health.	<ol style="list-style-type: none"> 1. Will it improve access to doctors’ surgeries and health care facilities? 2. Will it encourage healthy lifestyles and provide opportunities for sport and recreation? 	Population and Human Health and Material Assets.
4. To reduce poverty and social exclusion.	<ol style="list-style-type: none"> 1. Will it assist in reducing poverty and social exclusion? 	Population and Human Health and Material Assets.
5. To reduce crime and disorder and the fear of crime.	<ol style="list-style-type: none"> 1. Are the principles of good urban design in reducing crime promoted as part of the proposal? 2. Will it assist in reducing actual levels of crime? 3. Will it assist in reducing the fear of crime? 	Population and Human Health
6. To create and sustain vibrant communities and engage cultural activity across all sections of the Cherwell community	<ol style="list-style-type: none"> 1. Will it encourage a mixed use and range of housing tenure, including meeting affordable housing needs including for key workers? 2. Will it improve residential amenity and sense of place? 3. Will it improve the satisfaction of people with their neighbourhoods as places to live and encourage ownership? 4. Will it reduce actual noise levels and/or reduce noise concerns? 	Population and Human Health and Material Assets

SA Objective	Sub-Objective	SEA Topic
	5. Will it provide, protect or enhance locations for cultural activities, including the arts? 6. Will it enhance the townscape and public realm?	
7. To improve accessibility to all services and facilities.	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?	Population and Human Health and Material Assets.
8. To improve efficiency in land use through the re-use of previously developed land and existing buildings, including the re-use of materials from buildings, and encouraging urban renaissance.	1. Will it maximise the provision of housing development on previously developed land as opposed to greenfield sites? 2. Will it maximise the provision of employment development on previously developed land as opposed to greenfield sites? 3. Will it maximise housing densities to make efficient use of land? 4. Will it promote the adoption of sustainable design in construction practices and the use of recycled materials? 5. Will it promote good design to create attractive, high quality environments where people will choose to live? 6. Will it ensure land is remediated where appropriate? 7. Will it reduce the loss of <u>the best and most versatile</u> soil to development?	All
9. To reduce air pollution including reducing greenhouse gas emissions and ensure the district is ready for its impacts	1. Will it promote more sustainable transport patterns including public transport, walking and cycling? 2. Will it address any particular air quality impacts arising from specific operational and/or construction related development activities? 3. Will it improve air quality? 4. <u>Will it improve air quality at Oxford Meadows SAC?</u> 5. Will it help increase the proportion of energy generated from renewable sources?	Air
10. To conserve and enhance and create resources for the district's biodiversity	1. Will it, protect, enhance or restore a locally or nationally designated site of nature conservation importance? 2. Will it assist Cherwell District Council's Biodiversity Action Plan (BAP) and/or the Oxfordshire BAP achieve its targets?	Biodiversity Fauna and Flora

SA Objective	Sub-Objective	SEA Topic
	<ul style="list-style-type: none"> 3. Will it conserve or enhance biodiversity assets or create new habitats? 4. Will it minimise the fragmentation of existing habitats and enhance, restore or create networks of habitats? 5. Will it conserve and enhance species diversity; and in particular avoid harm to protected species? 6. Will it encourage protection of and increase the number of trees? 	
<p>11. To protect, enhance and make accessible for enjoyment, the district's countryside and historic environment.</p>	<ul style="list-style-type: none"> 1. Will it protect, enhance and restore the district's natural environment assets (e.g. the countryside, parks and green spaces, <u>Public Rights of Way</u>, common land, woodland and forest reserves, National Parks, AONBs etc.)? 2. Will it protect, enhance and restore the district's cultural and heritage assets (e.g. Scheduled Ancient Monuments, Listed buildings, Historic Parks and Gardens and Conservation Areas)? 3. Will it promote the accessibility of the district's countryside and historic environment in a sustainable and well-managed manner, <u>protecting currently accessible countryside (either informally used or via public rights of way)</u>? 4. Will it <u>maintain and enhance</u> the landscape character, ecological quality <u>of the countryside, including</u> opens spaces <u>within urban areas</u>? 5. Will it help preserve and record archaeological features? 	<p>Cultural Heritage and Landscape and Biodiversity Fauna and Flora.</p>
<p>12. To reduce road congestion and pollution levels by improving travel choice, and reducing the need for travel by car/ lorry</p>	<ul style="list-style-type: none"> 1. 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? 2. Will it promote more sustainable transport patterns in rural areas? 3. Will it reduce journey times between key employment areas and key transport interchanges? 	<p>Air, Population and Human Health.</p>
<p>13. To reduce the global, social and environmental impact of consumption of resource by using sustainably produced and local products.</p>	<ul style="list-style-type: none"> 1. Will it promote the use of locally and sustainably sourced, and recycling of materials in construction and renovation? 2. Will it reduce emissions of greenhouse gases by reducing energy consumption? 	<p>Climate Factors</p>
<p>14. To reduce waste generation and disposal, and achieve the sustainable</p>	<ul style="list-style-type: none"> 1. Will it promote sustainable waste management practices through a range of waste management facilities? 2. Will it reduce hazardous waste? 	<p>Water and Soil and Climate Factors</p>

SA Objective	Sub-Objective	SEA Topic
management of waste	3. Will it increase waste recovery and recycling?	
15. To maintain and improve the water quality of the district's rivers and to achieve sustainable water resources management	1. Will it improve the water quality of the district's rivers and inland water? 2. Will it enable recycled water to be used? 3. Will it promote sustainable water resource management, provision of new facilities/ infrastructure or water efficient measures?	Water and Soil and Biodiversity Fauna and Flora.
16. To increase energy efficiency and the proportion of energy generated from renewable sources in the district	1. Will it lead to an increase in the proportion of energy needs being met from renewable sources? 2. Will it promote the incorporation of small-scale renewable in developments?	Climate Factors
17. To ensure high and stable levels of employment so everyone can benefit from the economic growth of the district.	1. Will it promote accessible employment opportunities? 2. Will it promote employment opportunities accessible in rural areas? 3. Will it contribute to reducing short and long-term unemployment?	Population and Human Health and Material Assets
18. To sustain and develop economic growth and innovation, an educated/ skilled workforce and support the long term competitiveness of the district.	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 the area 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?	Population and Human Health and Material Assets
19. To encourage the development of buoyant, sustainable tourism sector.	1. Will it increase the employment of business opportunities on the tourism sector?	Population and Human Health

- 2.7 **Table 2.2** lists the “SEA topics” (listed in Schedule 2 of the SEA Regulations as the topics to be covered in SEAs) and shows that they were all covered by at least one of the SA objectives for the Cherwell Local Plan Part 1.

Table 2.2 Coverage of SEA topics by SA Objectives for the Cherwell Local Plan Part 1

SEA topic	SA objective covering the SEA topic
Biodiversity	8, 10, 11, 15
Population	1, 2, 3, 4, 5, 6, 7, 8, 12, 17, 18, 19
Human Health	1, 2, 3, 4, 5, 6, 7, 8, 12, 17, 18, 19
Fauna	8, 10, 11, 15
Flora	8, 10, 11, 15
Soil	2, 8, 14, 15
Water	2, 8, 14, 15
Air	8, 9, 12
Climatic Factors	2, 8, 13, 14, 16
Material Assets	3, 4, 6, 7, 8, 17, 18, 19
Cultural Heritage	8, 11
Landscape	8, 11

- 2.8 In addition to the use of the SA framework to assess the potential effects of Local Plan objectives, site options and policies as they were drafted, environmental and sustainability considerations were integrated into the Local Plan Part 1 through close working between initially Environ and then LUC and District Council officers drafting the plan. Early draft sections of the Local Plan Part 1, including draft policies, were sent to Environ and they attended meetings to discuss the emerging plan during the process of carrying out the SA. Similarly, LUC worked closely with Council officers to discuss and agree the scope of, and approach to, the SA of the work to be carried out following submission of the Local Plan to meet the requests of the Inspector.
- 2.9 Finally, the Local Plan Part 1 was also required to be subject to Habitats Regulations Assessment (HRA) under the Conservation of Habitats and Species (Amendment) Regulations 2012². 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 Cherwell Local Plan was undertaken separately from the SA, but the findings of the HRA Reports informed the SA process, particularly in relation to judging the potential effects on SA objective 10 (To conserve and enhance and create resources for the district’s biodiversity). The HRA process found that only the Oxford Meadows Special Area of Conservation (SAC) might be affected by the Local Plan, and the four other European sites within 20km of the District boundary were very unlikely to be affected. The final HRA Screening Report³ found that the Submission Local Plan incorporating Proposed Modifications will not lead to likely significant effects on Oxford Meadows Special Area of Conservation, either alone or in combination with other plans and projects.

² Statutory Instrument 2012 No. 1927.

³ Atkins (October 2014) Submission Cherwell Local Plan incorporating Proposed Modifications. Habitats Regulations Assessment: Stage 1 – Screening.

3 How the Environmental/SA Report has been taken into account

- 3.1 As stated above, the SA was undertaken iteratively, such that an assessment of the sustainability and environmental effects was made at each stage of the Local Plan Part 1's development. SA Reports were produced to describe the approach taken, the potential effects identified and put forward recommendations to avoid or minimise negative effects or enhance positive effects. District Council officers preparing the Local Plan took the SA findings and recommendations into account while making changes to the Plan before each round of public consultation.
- 3.2 **Table 3.1** overleaf shows how preparation of the SA Reports (including the Environmental Report requirements) corresponded with each stage of the Local Plan Part 1 preparation, and how any recommendations made were taken into account. In all cases, drafts of the SA Reports or Addendums were provided to the District Council prior to the Local Plan Part 1 documents being finalised for consultation.

Table 3.1 Stages of Local Plan Part 1 preparation and corresponding SA stages plus how the SA Reports have been taken into account

Time period	Plan-making stage	SA/SEA stage
2005 – 2006	Evidence gathering	<p>Scoping Report (December 2005)</p> <p>At this stage, the objectives and policies for the Local Plan had yet to be drafted and the Scoping Report did not therefore attempt to assess the likely effects of the emerging Plan; rather it determined the scope and level of detail for the later stages of the SA/SEA by reviewing the relevant baseline information for Cherwell, considering other relevant plans, policies and programmes and developing a set of SA objectives against which the Local Plan (then called the proposed Core Strategy Development Planning Document (DPD)) would be assessed.</p> <p>The Scoping Report was made available to the statutory consultees at the time (Countryside Agency, English Heritage, English Nature and the Environment Agency), along with other key stakeholders and interest groups, for consultation comments.</p>
2006 – 2008	Issues and Options	<p>Initial SA Report (February 2006)</p> <p>An Initial SA Report accompanied an Issues and Options Paper in February 2006. Alternatives to the plan approach were selected and tested through the SA Report by outlining the strategic issues for the Local Plan and appraising the options for tackling them.</p> <p>The draft 'spatial objectives' and 'core strategy options' for the Plan area addressed issues such as where to focus development, design standards, prioritisation of infrastructure, affordable housing and how to build the consideration of the environment into the strategy. Further options put forward in the document and appraised in the SA report included options for Banbury, Bicester, Kidlington and the Rural Areas in the north and south of the District.</p> <p>Site Allocations Initial SA Reports (2006-2007)</p> <p>This initial issues and options paper was supplemented by other Site Allocations Issues and Options Papers and accompanying Scoping and SA Reports for consultation through the rest of 2006 and 2007:</p> <ul style="list-style-type: none"> • Banbury & North Cherwell SA Scoping Report (March 2006) • Banbury and North Cherwell Initial SA Report (July 2006) • Bicester and Central Oxfordshire SA Scoping Report (January 2007) • Bicester and Central Oxfordshire SA Report (May 2007) <p>The conclusions of the SA reports accompanying the Issues and Options Consultations in 2006-2007 stated that at this stage there were limited areas of significant incompatibility between the spatial objectives and the SA objectives. Therefore, the spatial objectives were considered to contribute towards ensuring sustainable development in the District. The assessment of the Plan options against the SA framework found that some options appeared to be more favourable than others in terms of achieving sustainable development. However, no recommendations were made</p>

Time period	Plan-making stage	SA/SEA stage
		<p>about which options would be the most sustainable at this stage.</p> <p>These consultation documents were followed by SA workshops with Parish Councils and 'expert' organisations (English Partnerships, Oxfordshire County Council, Environment Agency and Cherwell Innovation) considering directions of growth and options for the rural areas.</p> <p>Together, the SA Reports accompanying the Issues and Options Papers and the SA workshops informed an 'Options for Growth' document published for public consultation in 2008. The 'Options for Growth' set out and appraised development options – broad areas around the main towns of Banbury and Bicester that were considered to be 'reasonable alternatives' for growth suitable for further investigation.</p>
2010	Draft Core Strategy	<p>SA Report (February 2010)</p> <p>In February 2010 the Draft Core Strategy (as the Local Plan Part 1 was previously referred to) was published and consulted upon. An SA Report (February 2010) accompanied the Draft Core Strategy, in which the District Council set out which options would be taken forward and which had been rejected. The SA Report included an appraisal of both the rejected and preferred options.</p> <p>The SA findings were summarised in Sections 4 and 5 of the February 2010 SA Report. Although no specific recommendations were made, as the SA drew conclusions regarding different options for the Strategic Objectives, strategic distribution of housing and employment development and the strategic housing and retail sites, the findings of the SA informed the development of the Strategic Objectives and policies SD1, Policy H1, Table 9, RA2, E1, E2, NWB1, BIC1, BIC3, BAN1, BAN2, BAN3, BAN4, BAN6, BAN7, BAN8 and BAN9 in in the Draft Core Strategy (February 2010) and informed the progression to the Proposed Submission Local Plan (August 2012).</p>
2012	Proposed Submission Local Plan	<p>SA Report (August 2012)</p> <p>The SA Report appraised the Proposed Submission Local Plan (August 2012).</p> <p>A number of specific recommendations relating to the detailed policies in the Proposed Submission Local Plan were presented in Table 8.1: Results of the SA. These related to additional wording that could be added to certain policies to provide mitigation for potential negative effects relating to issues, such as increases in road traffic, impacts on biodiversity and deterioration in water quality, and the enhancement of positive effects such as high quality design and landscaping to improve the townscape and landscape, encourage opportunities to use active modes of transport and provide access the countryside.</p> <p>These recommendations were taken into account by the District Council. In some cases, additional policy text was proposed.</p>
2013	Proposed Changes to the Cherwell Local	<p>SA Report (March 2013)</p>

Time period	Plan-making stage	SA/SEA stage
	Plan Proposed Submission – Focused Consultation	<p>A schedule of Proposed Changes to the Cherwell Local Plan Proposed Submission was generated as a result of the responses received to the consultation on the Local Plan Proposed Submission Document (2012), as well as publication of new evidence and the revocation of the South East Plan. The Proposed Changes were subject to a Focused Consultation in March 2013.</p> <p>The Proposed Changes to the Cherwell Local Plan Proposed Submission included minor clarifications to policy wording and the addition of appropriate mitigation measures. An accompanying SA Report considered the implications of the Proposed Changes to determine whether they affected the conclusions reached in the August 2012 SA Report. The summary table of SA findings (Table 8.1) was updated to reflect the revisions to the Local Plan made through the schedule of Proposed Changes (additional SA findings were shown in underlined text, deleted findings in strikethrough text). The summary table of SA findings also included the mitigation and/or enhancement measures that had been put forward through the SA for the themes and policies in the Local Plan, and where these had been incorporated into the Local Plan.</p> <p>In most cases, the Proposed Changes did not change the SA conclusions and recommendations set out in the August 2012 SA Report, although a number of already positive effects were further strengthened by the Proposed Changes. A number of the mitigation and/or enhancement measures from the August 2012 SA Report were shown in the fourth column of Table 8.1 in the March 2013 SA Report to have been included in the Local Plan through the schedule of Proposed Changes.</p> <p>SA Report (December 2013)</p> <p>Following the Focused Consultation on the Proposed Changes to the Proposed Submission Local Plan, the March 2013 SA Report was updated (December 2013) and submitted to the Secretary of State with the Local Plan for Examination on the 31st January 2014. The December 2013 SA Report reflected the Submission Local Plan, January 2014, which included the changes that were consulted on as part of the Proposed Changes Focused Consultation. In general, due to the incorporation of mitigation and/or enhancement measures recommended at the previous stage of the SA, the SA was able to conclude that there would not be residual significant adverse effects. However, significant residual adverse effects were identified in relation to permanent, irreversible loss of greenfield land and agricultural land (in particular for a number of the strategic site allocations). Minor residual adverse effects were also identified in relation to air quality, but these were thought to be reversible.</p> <p>The examination hearings were suspended on 4 June 2014 for six months to enable the Council to put forward proposed modifications to the plan involving increased new housing delivery over the plan period to meet the full up to date, objectively assessed needs of the District, as required by the National Planning Policy Framework and based on the Oxfordshire Strategic Housing Market Assessment 2014.</p>
2013	Examination Evidence gathering	<p>Updated SA Scoping Report Addendum (June 2014)</p> <p>Prior to commencing the additional SA work that was requested by the Inspector during the initial Examination hearings,</p>

Time period	Plan-making stage	SA/SEA stage
		<p>LUC prepared an updated SA Scoping Report in June 2014 to address the scope of work being carried out by the District Council to consider additional options. A full SA Scoping Report was considered to be unnecessary as the additional SA/SEA work focused on particular elements of the Local Plan. Therefore, the Scoping Report Addendum focused on the work required in preparing the Addendum to the full SA Report, providing the context for the additional SA/SEA work required for the Main Modifications. The Scoping Report Addendum included:</p> <ul style="list-style-type: none"> • Updated review of relevant plans and programmes • Updated baseline information • A summary of the reasonable alternatives that were to be subject to appraisal (see Section 5 of this Adoption Statement). • A summary of the updated policy context for the Cherwell Local Plan, as well as the relationship between the additional Local Plan work and other relevant plans or programmes. • An update of the key environmental, social and economic characteristics and factors pertaining to the plan area, focusing on the areas likely to be affected, insofar as they are relevant to the appraisal work to be undertaken. • The method that will be used to undertake the appraisal, including the SA framework, approach to predicting effects, monitoring, and the proposed structure of the SA Report Addendum. • An explanation of the next steps and timetable for the appraisal work to be undertaken and consultation on SA Report Addendum. <p>As part of defining the reasonable alternatives for the strategic development locations that were to be assessed as part of this additional work for the Cherwell Local Plan, a set of draft 'reasonableness' criteria was developed. The draft reasonableness criteria were defined by considering how the constraints and opportunities for development contained in the National Planning Policy Framework (NPPF), Planning Policy Guidance (PPG) and the strategic objectives of the Submission Local Plan would influence whether an alternative is reasonable. The draft reasonableness criteria for the strategic development locations were as follows:</p> <ul style="list-style-type: none"> • Locations within Flood Zones 2 and 3 will not be considered to be reasonable alternatives unless alleviation and mitigation is clearly achievable (as these are areas of higher risk of flooding). • Locations within the Cotswold AONB will not be considered to be reasonable alternatives. • Locations within international and national biodiversity designations will not be considered to be reasonable alternatives. • Locations that would cause substantial harm to scheduled monuments, battlefields, Grade I and II* listed buildings, Grade I and II* registered parks and gardens will not be considered reasonable alternatives

Time period	Plan-making stage	SA/SEA stage
	Main Modifications	<ul style="list-style-type: none"> • Locations should avoid Minerals Safeguarding and Consultation Areas identified in the Oxfordshire Minerals and Waste Local Plan: Core Strategy Consultation Draft, February 2014, but recognising that they are not an absolute constraint to development. • The wider undeveloped countryside in those parts of the Rural Areas that do not offer a sufficient range of existing (or realistic potential) jobs, services, and facilities will not be considered to be reasonable alternatives. • Locations that do not currently provide, or realistically are unlikely to be able to provide, alternative transport modes sufficiently attractive to act as alternatives to the car will not be considered to be reasonable alternatives. • Locations that would not accord with the NPPF reasonableness criteria for landscape, biodiversity and heritage will not be considered to be reasonable alternatives. <p>The Scoping Report was consulted upon between the 25th June and 30th July 2014.</p> <p>SA Addendum (August and October 2014)</p> <p>The 2014 SA Addendum was produced at the request of the Examination Inspector. The SA Addendum is an Addendum to the full December 2013 SA Report for the Submission Cherwell Local Plan, January 2014, and was prepared to be read alongside that report, as together they are intended to meet the requirements of the SEA Directive. The Addendum describes the options considered by Cherwell District Council following the hearing sessions in June 2014, which include options for the quantum of housing and employment development to be delivered as well as spatial options relating to how development should be distributed across the District. All options were subject to SA by LUC, and the findings presented in an initial SA Addendum (August 2014) informed the District Council’s work on preparing Proposed Main Modifications to the Local Plan. Following consultation from August-October 2014, the SA Addendum was updated (October 2014) and reported on the SA implications of the Main Modifications being proposed to the Local Plan, highlighting differences from the Submission Local Plan.</p> <p>The SA Addendum found that the overall spatial strategy in the Submission Local Plan represented a balanced and proportionate way of accommodating the additional development needed and should continue to be pursued, taking into account that there is no necessity for an immediate strategic review of the extent/boundaries of the Oxford Green Belt in the District for new housing.</p> <p>The SA Addendum identified the potential positive and negative effects of all options and the mitigation that would be needed to ensure that they are developed sustainably. The SA Addendum records the reasons of the Council why some reasonable alternatives were included in the proposed Main Modifications, and others rejected (see Section 5 of this Adoption Statement).</p>

4 How opinions of consultation bodies and the public have been taken into account

- 4.1 At each stage of the Local Plan Part 1's development, an SA Report was published alongside the Local Plan for consultation with the public and the consultation bodies specifically relating to the SEA Directive (i.e. Historic England, Environment Agency and Natural England). The SEA Regulations require the SEA Adoption Statement to summarise how any opinions expressed by the public and the consultation bodies about the SEA have been taken into account.
- 4.2 The Local Plan Part 1 consultation stages and responses received relating to the SA Reports are summarised below.

Evidence gathering and Issues and Options (2005-2008)

- 4.3 The SA Scoping Report was published for consultation in December 2005, and an Initial SA Report (February 2006) setting out the appraisal of the Core Strategy Issues and Options was published for consultation from February-April 2006. In order to undertake comprehensive and detailed SA, the Council also consulted stakeholders and interested parties at a series of workshops throughout the Issues and Options preparation.
- 4.4 Comments received on the 2005 SA Scoping Report informed the Council's SA work and the 2010 SA Report.
- 4.5 Two comments relating to the Initial SA Report were recorded in Appendix 1 of the Council's Statement of Consultation (August 2012):
- The final Sustainability Appraisal should contain a full account and justification for the rejection of certain options in the development of the Council's preferred strategy.
 - Regarding Objective 8, the following wording should be added: 'including local stone which is a finite resource and should be built so as to be easily reused as building stone in the future'.
- 4.6 The first comment was addressed in subsequent SA Reports (see Section 5 of this Adoption Statement). The second comment was not considered necessary to incorporate as the SA Framework already contains objectives for the use of recycled materials and local products.

Draft Core Strategy (2010)

- 4.7 The SA Report for the Draft Core Strategy was published for consultation between February and April 2010. A number of comments relating to the SA were recorded in Appendix 3 of the Council's Statement of Consultation (August 2012) (and reproduced in the December 2013 SA Report):
- One respondent suggested sustainability will be constrained by CDC's ability to enforce policies where private developers will need to be persuaded to incur extra costs.
 - One developer stated that it is imperative that the sustainability of individual sites is assessed on a consistent basis. From an analysis of the Sustainability Appraisal the respondent was of the view this did not always appear to have been the case. They were not confident that the site to the south of Broughton Road has been assessed in a fair and equitable manner. In part the respondent thought this was due to its inclusion within the land to the south (and west of Bloxham Road) but otherwise it appeared to arise by not considering sites and their potential constraints in a consistent manner. Examples were given.
 - One respondent found the weighting given to some villages in the CRAITLUS report confusing. For example, Cropredy was given a far higher sustainability rating than it can actually deliver, therefore the respondent was of the view that the issue of sustainability in villages needed to be readdressed in some cases.

- One respondent asked how the strategy relates to the proposed high speed rail link through the centre of the region.
- One respondent argued the proposal to place 400 houses in Bodicote and relocate Banbury Football Club to Bodicote is not compatible with sustainable development.
- One respondent suggested that BAN3 would not be sustainable. The use of cars would increase and everywhere is too far to walk or cycle (carrying a load).
- One respondent commented that it seems strange to be advocating more building on greenfield sites, when the country will need more food grown locally. There is no provision for allotments, and in fact at least one disappears according to the maps.
- One respondent suggested the town needs the flood alleviation scheme to be completed before Canalside can be developed.
- Several respondents suggested the work seems to be a broad-brush desk exercise with too many judgements one could challenge.
- One respondent raised the issue of theory versus practice. In theory the social economic and environmental aspects show awareness. In practice what is proposed does not tie in. Categorising sustainability is nebulous e.g. a village may have a school but it could already be at bursting point.
- One respondent commented that CDC's commitment to reducing carbon emissions from development and to pursue stated policies relating to biodiversity and conservation is to be commended.
- One respondent found it very technical and difficult to understand, they could not really relate it to the things that they are concerned about living in Hanwell.
- One respondent suggested it is not evident from the plans how (for example) a 50% reduction in car usage will be achieved or where 40% green space is being achieved.
- One respondent stated that a succinct green slogan is 'think globally act locally'. They questioned how we can save the rainforest when we are destroying our own countryside to promote rapid population growth in an overcrowded island.
- One respondent asked why farmers are not allowed to remove their farmland from the development map if they so wish.
- One respondent asked who is going to live in all these houses and where is all the employment. There are plenty of existing empty houses.
- One respondent suggested that empty premises and 'brown sites' in towns where people work should first be priority before destroying villages.
- One respondent stated that as they have major concerns regarding infrastructure in Bicester and disapproved of the proposed NW option, they must therefore disagree with the Sustainability Appraisal.
- One developer commented that while in general the SA framework allows a reasonably objective comparison between sites aligned with the objectives of the Core Strategy, it is too broad brush in some areas to distinguish between sites. Particular concern related to protecting best and most versatile agricultural land or where this is not possible, taking the lower grades first for development to be a significant omission despite its assessment within the SA elsewhere.
- One respondent considered that the sustainability performance of Banbury Canalside was overstated. The site relies on the extensive relocation of employment uses; this has the potential to extinguish existing businesses, and poses a serious threat to the overall economic performance of Banbury. Economic performance is an important component of the overall sustainability of Banbury.
- One developer commented that the SA assessed Land West of Bretch Hill as having 'Mostly Positive' effects on the economic objective. The assessment provided a wholly inadequate justification for this assessment.

- The SA highlighted that the integration with Bretch Hill may reduce social problems, but it is not explained or justified how the site will make a 'Mostly Positive' contribution to sustaining economic growth in Banbury.
- One respondent suggested that the Sustainability Appraisal submitted in support of the Core Strategy is deficient in its consideration of the likely impacts of options for housing growth around Bicester.
- The same respondent commented that the NW Bicester eco-development performs better than the previously promoted sites, despite the larger scale of development. In those categories where the Eco-town has performed better than its predecessor on the same site, the improvement is not based on evidence that the benefits can or will be delivered. The improvements are generally based upon the criteria set out in the supplement to PPS1, concerned with eco-towns. They also consider the improvement of the Ecotown against the SA objective of encouraging tourism, on the basis that the rarity of eco-towns will attract visitors, to be entirely spurious and symptomatic of an attempt to artificially enhance the apparent sustainability credentials of the allocation.
- One respondent asked if anyone actually questioned the assumptions that all of this is based upon and if anyone has been out to physically check what damage could be caused.
- One respondent argued that traffic on the A4260 Banbury to Oxford Road will not be sustainable if some or all of the proposed development proceeds. If log jamming of vehicles is not to occur then further consideration needs to be given to road improvements.
- One respondent commented that many of the comments and statements are politically driven by government and are unlikely to represent what will really happen. Most families will continue to have two cars; they will use them to travel to and from the motorway to work, shop and use for leisure. Without significant changes to the road system in Banbury gridlock will be the norm.
- Banbury Town Council commented that BITLUS identified Canalside as the most sustainable location in terms of transport, but it also highlighted that every arterial road into Banbury was at capacity in the Town Centre, and that they cannot easily be improved or widened due to physical restraints. The Town Council feels that CDC needs to support a South East Link Road and by working in partnership with CDC and OCC they can prioritise this matter.
- Bloxham Parish Council considered that the economic needs of the district should sit at the centre of the SA on an equal measure with environmental and social issues. Regrettably, there are shortcomings in the evidence base in this regard e.g. the employment land review.
- Sibford Ferris Parish Council argued that although its general thrust is towards a more even distribution of expansion, the Draft Sustainability Appraisal itself failed to weight sufficiently transport problems in remote areas or the problems for the provision of local employment.
- Bucknell Parish Council considered that the draft Sustainability Appraisal was a desk-top exercise which is fundamentally flawed because it fails to take into account the present inadequate infrastructure. Without adequate infrastructure, they do not believe that sustainability is achievable.
- Hanwell PC were very concerned at the assessment of sites BAN4 and BAN5 which does not seem to reflect the issues fought over at the Persimmon Appeal Inquiry in 2007 - by CDC itself - and seem overall to indicate that the landscapes are not as worthy of protection as other potential housing sites around Banbury.
- Hanwell PC were very concerned at the way the Strategic Site J in Banbury (i.e. Sites BAN4 and BAN5) has been assessed in Appendix 1 Table 35 (Land at NW Banbury) relative to other sites, giving the overall impression that it is of low value and development would make positive impacts.
- English Heritage commented that the Sustainability Appraisal that accompanies the draft Core Strategy anticipates further work for all stages of the process. English Heritage stated that they had recently published guidance on 'Strategic Environmental Assessment, Sustainability Appraisal and the Historic Environment' that they hope will be of assistance in this process in informing the continuing development of the LDF.

- The Highways Agency was content that the sustainability appraisal had been satisfactorily prepared in accordance with national guidance and its findings reflect the most sustainable sites of those identified.
- OCC Archaeology was satisfied that the Sustainability Assessment includes the preservation of the historic environment within its sustainability objectives.
- The Environment Agency commented that in Table 14 it is not clear why Canalside scores more positively than Land west of Concorde Avenue. Both sites are in Flood Zones 1, 2 and 3. Possibly Canalside is seen as partly positive as a result of the Flood Alleviation Scheme, but this would not be correct because the Alleviation scheme is designed to reduce risk to existing development, and is not being delivered by the Canalside regeneration. Also, if these sites are compared to the assessment of Canalside in table 30, a different score is given again. At this stage it is not clear if flood risk reduction can be delivered through implementation as the evidence base Level 2 SFRA and Masterplan have not been produced to a standard where this can be determined yet. More clarity and consistency is needed between the assessments of sites at risk of flooding.
- Banbury Civic Society commented that normally part of the evidence base for the preparation of a Core Strategy would be a Historic Landscape Categorisation and, often, an Extensive Urban Survey (EUS). Neither has been available for use within the Sustainability Appraisal, although it accepted that the commissioned Landscape and Visual study covered a number of the usual bases.
- Banbury Civic Society was very concerned that the Land at Calthorpe Street (Site N) had been dismissed so lightly. Development here could regenerate the Old Town and induce footfall up the High Street from the Castle Quay area. Clearly the Sustainability Appraisal has not been able to reflect PPS 5.

4.8 These comments were considered by the Council during preparation of the Proposed Submission Local Plan and also by Environ while preparing the August 2012 SA Report alongside the Proposed Submission Local Plan.

Proposed Submission Local Plan (2012)

4.9 The first SA Report prepared by Environ on behalf of the Council alongside the Proposed Submission Local Plan was published for consultation between August and October 2012.

4.10 The main issues raised during the Proposed Submission consultation in 2012, which were relevant to the August 2012 SA Report are summarised below and covered:

- How the need for additional growth and alternative sites was assessed and how the process of selection of sites was undertaken.
- Why some strategic housing sites which had identified environmental constraints had still been taken forward.
- Policy ESD 15: Green Boundaries to Growth was not assessed.
- How the results of the SA have informed Plan development.
- Specific comments about the sustainability appraisal regarding specific sites including North of Hanwell Fields, West of Bretch Hill.
- Further archaeological and historic environment related baseline information for several sites was provided by English Heritage and Oxford County Council Archaeology as well as suggestions for relevant mitigation measures.
- English Heritage was concerned that Policy SLE4 had not taken account of the impacts of the Bicester relief road on Bicester 2 - Graven Hill and the Achester Roman Town.
- English Heritage was concerned that Policy ESD16 on the Built and Historic Environment was not sufficient to accord with the requirements of the NPPF.
- Further ecological baseline information for several sites was provided by Oxford County Council Ecology as well as suggestions for relevant mitigation measures.

- Whether habitat networks had been considered within the assessments under SA Objective 10.
- 4.11 The consultation comments received on the August 2012 SA Report were taken into account by Environ as it undertook further SA work in relation to the Proposed Changes to the Submission Local Plan.
- 4.12 Advice in the 2012 SA Report and responses from consultation (August-October 2012) prompted the Council to commission further landscape studies and environmental evidence. The new evidence looked at the areas of search identified at previous stages of the Plan. Other evidence documents were also updated by the Council. All relevant evidence updates were incorporated into the SA baseline update in the 2013 SA Report, and taken into account by the SA team when carrying out the policy and site assessments presented in the March 2013 SA Report.
- 4.13 Individual SA matrices were also updated in Annexes B and C of the March 2013 SA Report to reflect specific comments and advice provided by Oxford County Council and English Heritage and other consultees. Policy ESD 15 was appraised and included in Annex B. The process of alternatives selection was described in the Chapter 7 of main SA report, and further detail on the reasons for choosing sites to take forward in the Submission Local Plan was also provided in Annex B for the selected sites and in Annex C for the rejected sites.

Proposed Changes to the Proposed Submission Local Plan – Focused Consultation (2013)

- 4.14 The SA Report to accompany the Proposed Changes was published for a Focused Consultation between March to May 2013, and addressed the consultation comments received in relation to the August 2012 SA Report as summarised above.
- 4.15 The main issues raised during the Proposed Changes consultation which were relevant to the SA are summarised below:
- The plan may not be sustainable unless effective transport links are established, and may not meet requirements to reduce transport emissions.
 - Comments on the Green Buffer Report in relation to Launton.
 - Opinions on the validity of the result of and need for the updated evidence base in relation to landscape.
 - How 'significance' has been assessed, in relation to valuable and vulnerable receptors of national and local value, specifically in relation to assessment of Salt Way.
 - Criticism of the assessment of the sustainability of strategic development sites in Banbury.
 - Concerns over the deliverability of Banbury 1 Canalside given the need to relocate businesses.
 - Comments from respondents to the north of Banbury that the relative sustainability benefits of development to the south of Banbury are understated.
 - Comments that the SA has been undertaken fully and correctly for Kidlington but that the ongoing role of Kidlington needs to be clearer in the Local Plan and explained more clearly in the SA.
 - Raising concerns about air quality on Bicester Road, Kidlington.
 - Supportive comments on the need for a small scale review of the Green Belt around Langford Lane, Kidlington, but also questioning why the SA has not addressed this.
 - That the mitigation for Bicester 10 Bicester Gateway can be achieved.
 - The SA should have differentiated between the two Kidlington 1 areas because their characteristics are different.
 - The consistency of site assessments across the SA objectives, particularly for the housing objective (SA Objective 1).
 - The relationship between the assessment scores for the strategic housing policies and the score achieved by individual strategic housing allocation sites.

- Information on the flood risk, and previous flooding events associated with the Gaggle Brook, Wendlebury Brook and the Alchester Roman Town.
- Comments on infrastructure improvements.

4.16 The consultation comments received on the March 2013 SA Report were taken into account by Environ as it undertook further SA work in relation to the Submission Local Plan (as explained in Chapter 3 and Annex D of the December 2013 SA Report).

Submission (2013-2014)

4.17 The SA Report was updated in December 2013 to accompany the Submission Local Plan when it was submitted for Examination in January 2014, and to address comments received during the Proposed Changes Focused Consultation.

Examination (2014-2015)

4.18 Representors to the Local Plan submitted Statements to the Examination prior to the Hearing Sessions, but did not challenge the adequacy of the SA work.

4.19 During the Examination hearing sessions for the Local Plan in June 2014, the Inspector requested that the District Council prepared Main Modifications to the Submission Local Plan, January 2014, involving increased levels of housing delivery over the plan period to meet the full, up to date, objectively assessed needs of the District, as required by the National Planning Policy Framework (NPPF) and based on the Oxfordshire Strategic Housing Market Assessment 2014 (SHMA). The Inspector made it clear that the scope of the Main Modifications to the Local Plan should relate to the objectively assessed needs identified in the SHMA 2014 for Cherwell District. An SA/SEA addendum was needed to inform and test the Main Modifications to the Local Plan.

Updated Scoping Report for the SA Addendum (June 2014)

4.20 An updated SA Scoping Report was consulted upon between 25th June and 30th July 2014. The Scoping Report related specifically to the additional SA work to be undertaken and did not represent a full update to the 2005 Scoping Report.

4.21 The consultation responses received from the statutory consultees in relation to the updated Scoping Report are summarised in Appendix 1 of the 2014 SA Addendum along with an explanation of how and where they had been addressed within the SA Addendum.

4.22 The responses included recommendations for amendments to the baseline information, SA objectives and assumptions to be used in the appraisal. Natural England and Historic England questioned the robustness of the 'reasonableness criteria'. Several of the comments were observations only or related more to the plan-making process than the SA and did not require any action to address them, while a number of others were not addressed for the reasons described in the 2014 SA Addendum – for example, where suggested changes to the SA objectives were not considered to be appropriate because they would result in a certain issue being addressed by more than one SA objective. Those comments that were addressed were done so in the relevant chapters and appendices of the 2014 SA Addendum (i.e. Chapters 2, 3 and 4, Appendix 2 Updated review of relevant plans and programmes and Appendix 3 Updated Baseline Information).

SA Addendum for the Local Plan Part 1, including SA of Main Modifications (Draft August 2014) and (Final October 2014)

4.23 The August 2014 SA Addendum was published for consultation alongside the Main Modifications to the Cherwell Submission Local Plan between August-October 2014, and the SA Addendum was updated (October 2014) to reflect consultation comments (as described in Appendix 8 of the Final SA Addendum). A large number of consultation responses were received from stakeholders and these were taken into account by the District Council as it prepared updated position statements in advance of the resumed examination hearings. The consultation comments were also published in full on the Council's website.

4.24 Several of the consultation responses related more to the plan-making process and the individual Main Modifications than the SA, or questioned particular findings of the SA, which although an

explanation was provided in Appendix 8 of the SA Addendum did not require any action to address them.

- 4.25 A number of consultees questioned the approach in the SA of not considering green belt sites as reasonable alternatives. Paragraph 4.5 in the SA Addendum was edited to make it clearer why strategic release of Green Belt land was not considered to be a reasonable alternative, and to explain that the Local Plan was likely to require an early review once the established process for considering the full strategic planning implications of the 2014 Oxfordshire SHMA, including for any unmet needs in Oxford City, has been fully considered jointly by all the Oxfordshire Councils. This point was reiterated in relevant paragraphs within Chapters 5 to 9.
- 4.26 Specific comments were made in relation to the SA Findings for particular strategic sites. Following the consultation on the Proposed Main Modifications and the Draft SA Addendum (August 2014), a number of edits were made to the appraisal matrices in Appendix 5, to address minor inconsistencies between site appraisals. In a few places, these edits resulted in changes to SA scores. However, only a small number of these related to changes from or to a significant score. The revised scores were amended where relevant in Tables 7.2-7.6. Text in Chapter 7 was also updated to reflect any changes to or from significant effects.

5 Why the adopted Local Plan Part 1 was chosen in light of reasonable alternatives

5.1 Chapter 7 of the 2013 SA Report for the Proposed Submission Local Plan summarises the reasonable alternatives that were considered at each stage of the Local Plan's preparation, and the reasons for selecting or rejecting the different alternatives. Further reasonable alternatives were then considered and described in Chapters 5 to 8 of the 2014 SA Addendum, as summarised below.

Issues and Options (2006-2008)

5.2 The Core Strategy Issues and Options paper (2006), included a draft vision and spatial objectives (economic, community and environmental), as well as a number of options for addressing issues such as where to focus development, design standards, prioritisation of infrastructure, affordable housing and how to build the consideration of the environment into the strategy. The Issues and Options paper divided the options between the following five Key Spatial Issues:

- Key Spatial Issue 1: The need to ensure convenient access to services and facilities.
- Key Spatial Issue 2: The need to protect and enhance Cherwell's built and natural environment.
- Key Spatial Issue 3: The need to promote prosperity and a sustainable economy.
- Key Spatial Issue 4: The need to ensure the full and timely provision of housing including affordable housing.
- Key Spatial Issue 5: The need to promote and enhance the role of town centres and local shopping facilities.

5.3 Key Spatial Issue 5 appraised in the SA report included options for the role of Banbury, Bicester, Kidlington and the Rural Areas in the north and south of the District, and generally where future growth should be located at Banbury, Bicester and Kidlington. At this stage strategic site options were not assessed.

5.4 In terms of the overall spatial distribution, the Issues and Options paper included four options for the Council to distribute its housing requirements (Issue 4A) within the District as follows:

- Option 1 – Distribute housing growth in accordance with [then] Structure Plan policy: Banbury and Bicester as the main growth areas with the remainder at larger settlements that can be well served by public transport;
- Option 2 – Some reduction of growth at Banbury and Bicester and more growth at the larger settlements that can be well served by public transport;
- Option 3 – Some reduction of growth at Banbury and Bicester and more growth at smaller villages in the interests of improving services and facilities including public transport;
- Option 4 – More growth at Banbury and Bicester and less growth at other settlements.

5.5 Option 4 was taken forward in order to focus development in the towns as these were considered to be more sustainable locations. It was considered that Options 2 and 3 were not suitable as Cherwell's villages generally had a lack of services and facilities required to support significant levels of housing development. Option 1 was superseded by the South East Plan.

5.6 In addition to the main Issues and Options paper, two further Site Allocations Issues and Options Papers covering 'Banbury and North Cherwell' and 'Bicester and Central Oxfordshire' with accompanying Scoping and SA Reports for consultation through the rest of 2006 and 2007.

5.7 These consultation documents were followed by SA workshops with Parish Councils and 'expert' organisations (English Partnerships, Oxfordshire County Council, Environment Agency and

Cherwell Innovation) and directions for growth workshops with developers, other stakeholders, and separately with Parish Councils.

5.8 Drawing on the responses to the Issues and Options Papers consulted upon above and comments made at the workshops, the Council's Options for Growth paper was produced for public consultation in 2008. This document set out strategic development options, including strategic site options, under three main groups of options for accommodating housing growth in Cherwell:

- 1 Distribution of development across the District – This first group of options focuses on the broad distribution of housing between Banbury and Bicester, between the towns and remaining areas, and between villages in North Cherwell and villages within the Central Oxfordshire sub region.
- 2 Sites for major development – This group of options relates to specific strategic sites for accommodating housing (at least 400 homes) at Banbury and Bicester.
- 3 Distribution of growth to villages – This third group focuses on the broad distribution of development within the remaining areas i.e. the rural areas and Kidlington.

5.9 The Options for Growth paper identified 'reasonable' alternatives for growth within the context of national and regional policy at the time. Constraints and opportunities for growth informed the reasonable alternatives which could help deliver the key spatial objectives and vision for the Core Strategy. Paragraph 5.12 of the Options for Growth paper summarised the strategic constraints and opportunities that need to be considered in identifying options for housing growth as:

- Accessibility to services and facilities.
- Flood risk.
- Landscape and visual impact.
- The impact on the historic environment.
- Ecological impact.
- The Oxford Green Belt.
- Settlement identity and supporting existing communities.
- The ability to integrate with existing built up areas.

5.10 Council's justifications for the alternatives progressed and rejected are set out in detail in Sections 6 to 9 of the Options for Growth paper Supporting Report (August 2008).

Draft Core Strategy (2010)

5.11 The Draft Core Strategy (2010) set out draft Strategic Objectives and different options for the strategic distribution of housing and employment development, town centre uses and the strategic housing and retail sites. The February 2010 SA appraised all of the reasonable alternatives, and the findings informed the development of the Strategic Objectives and policies SD1, Policy H1, Table 9, RA2, E1, E2, NWB1, BIC1, BIC3, BAN1, BAN2, BAN3, BAN4, BAN6, BAN7, BAN8 and BAN9.

5.12 Justification on the selection of the preferred options set out in the Draft Core Strategy was presented in the summary findings of the SA Report, which stated that:

- For the strategic objectives – While the objectives would generally lead to sustainable development in Cherwell District. The impacts of growth on the District's environmental assets however, will have to be considered, mitigated and monitored.
- For strategic housing distribution – New housing development should be focused in the urban areas, with some development in the rural areas. Informed policies SD1, NWB1, H1, Table 9, and RA2.
- For housing distribution in the rural areas – Distributing development more widely across the 24 villages identified as sustainable locations for development should help to maintain existing services and facilities and should help 'spread' the impact of development. Informed policy RA2.

- For employment development at Bicester and Banbury – The eco-development at North West Bicester provides the most sustainable option for accommodating both housing and employment development due to its location and its potential sustainability credentials. Informed policies E1, NWB1. The most sustainable policy approach towards accommodating employment growth in Banbury is probably to locate this near existing employment areas (e.g. south of Overthorpe road). Informed policies E1, BAN6.
- For the Town Centre uses, the options considered the effects of expanding existing urban centre areas for 'town centre uses' compared to only allowing for the re-development of existing areas already within the town centre boundary – Both options were found to be equally sustainable with different sustainability pros and cons, therefore the SA recommended that the results of the SA should be considered in relation to the amount of new floor space that is required (PPS6 Study) in Banbury, Bicester and Kidlington and whether this can be reasonably and practicably accommodated within existing centres. The SA concluded that due to the need for Banbury to accommodate more retail floor space, which cannot be accommodated within the current town centre, it may be necessary for the town centre area to be increased. Informed policies E2, BAN7, BAN8, BAN9, and BIC3.
- For the strategic housing sites - Banbury provides a sustainable location for new development, but some strategic sites (the Canalside area) are more sustainable than others. At Bicester, the implementation of the eco-development is the most sustainable strategic development site. Informed draft policies E1, NW1, BIC1, BAN1, BAN2, BAN3 and BAN4.
- For the retail site options - Alternative sites for town centre uses in Bicester were not considered as the Bure Place car park site has planning permission and the PPS6 assessment did not highlight a significant need for additional retail floor space in Bicester. Alternative sites for town centre uses in Kidlington were not considered as the PPS6 assessment did not highlight a significant need for additional retail floor space in Kidlington. Four sites were considered for Banbury and the SA found that Canalside and land west of Concorde Avenue are both at risk from flooding. However in relation to the other SA objectives they score positively. Calthorpe Street is not at risk of flooding but will not bring other advantages in addition to the general economic benefits of town centre development which all sites would bring. Bolton Road is the most sustainable site as it does not flood and will allow for the preservation and enhancement the historic environment. The Core Strategy should consider land ownership and the viability of re-developing each of these sites. Informed draft policies BAN 1, BAN 8, BAN 9.

Proposed Submission Local Plan (2012)

5.13 In August 2012, the Council produced a Proposed Submission Local Plan for public consultation with an accompanying SA report. It included:

- A vision for the district, a spatial strategy and a series of key objectives. The spatial strategy for how growth will be managed was summarised as:
 - Focusing the bulk of the proposed growth in and around Bicester and Banbury.
 - Limiting growth in our rural areas and directing it towards larger and more sustainable villages.
 - Aiming to strictly control development in open countryside.
- Planning policies grouped under three themes:
 - Theme One: Developing a Sustainable Local Economy - The Local Plan seeks to ensure that there is a balanced supply of employment land to meet the needs of the district for the plan period. 'Policy SLE 1: Employment Development' seeks, as a general principle, to protect existing employment land and buildings. The Local Plan allocates eight strategic employment areas to meet the employment plan needs over the plan period (six at Bicester, one at Banbury and one at Former RAF Upper Heyford). Town centre boundaries are identified for Banbury, Bicester and Kidlington to direct retail and other appropriate development to the main town and village centres. The plan also includes proposals for supporting tourism, improving transport connections and addressing the challenge of High Speed Rail.

- Theme Two: Building Sustainable Communities. The plan sets the overall distribution of development across the district, following the South East Plan which required Cherwell District to deliver 13,400 new homes across the district between 2006 and 2026. It adds a further 5 years up to 2031, a total of 16,750 new homes, of which a substantial number have already been built. The Council identifies North West Bicester as a strategic allocation for Bicester together with a major housing development at Graven Hill, Bicester which will result in more housing distributed to Bicester than elsewhere in the District. As a consequence of this housing growth at Bicester, the Local Plan proposes to reduce the overall level of growth directed to the rural areas of the district. Accordingly, the target for the rural areas is reduced compared with the Draft Core Strategy (Feb 2010). The Local Plan identifies the key strategic housing sites (i.e. able to accommodate over 400 homes) that will need to be developed to meet needs within Banbury (five sites) and Bicester (four sites) for the period up to 2031. It does not identify all sites for new housing for the period up to 2031. Within the rural areas, the Local Plan does not identify the specific sites where future housing will go. However, it identifies 23 villages within the district within which these allocations will be made. An exceptional scheme has already been approved to secure heritage conservation and environmental improvements at the Former RAF Upper Heyford airbase, which will result in the development of 761 new homes in addition to the 314 ex-military homes that already exist.
- Theme Three: Ensuring Sustainable Development. The Local Plan contains a wide number of other strategic policies that will help build sustainable communities and ensure sustainable development.
 - Policies for Cherwell's Places: Bicester, Banbury, Kidlington and the villages and rural areas. For each area it outlines how the three themes will be delivered and proposed strategic development sites for housing, employment and open space.
 - Infrastructure Delivery Plan: what new infrastructure and key facilities the Local Plan will secure.
 - Monitoring Delivery of the Local Plan setting out how delivery of the three policy themes, the objectives and strategic development sites of the Local Plan will be monitored and reviewed.

- 5.14 Appendix C in the 2012 SA Report that accompanied the Proposed Submission Local Plan provides a full list of all the options considered at Issues and Options and Draft Core Strategy stages and reasons for their selection/rejection. Section 7.3 in the 2012 SA Report summarises the reasons why earlier options have been taken forward or rejected in the Proposed Submission Local Plan.
- 5.15 In some cases options were previously considered but they are no longer appropriate to take forward as policies in the Proposed Submission Local Plan. This was because the 'issues and options' were devised early in the plan making process and government guidance on the preparation of Local Plans has changed or local evidence has shown a change in trends.
- 5.16 An example of this situation is employment land in North West Bicester. PPS1 (now replaced by the National Planning Policy Framework and the Local Plan Part 1) set out how there should be one new employment opportunity per new dwelling (5,000 at North West Bicester). Option 1 for North West Bicester reflected PPS1. Option 2 for North West Bicester was devised to explore the sustainability of locating most employment development in an alternative location closer to existing employment areas in the east of the town. Due to the need to meet the NPPF requirements for economic growth, to address out commuting and unemployment, a significant amount of employment land was identified in the Proposed Submission Local Plan, including land previously proposed at North West Bicester and land to the east of Bicester. Both options were therefore been taken forward with employment land proposed in both locations.
- 5.17 Most of the decisions relating to the rejection of strategic site options were made on the basis of environmental (such as flood risk, noise and landscape impacts) and accessibility impacts (such as access to town centres, schools, public transport hubs). For example, 'Land South East of Bicester' (now 'South East Bicester') was identified as an option in the Council's Options for Growth Document 2008 but not considered a 'reasonable alternative'. It was assessed as a larger site and was not identified for development in the Draft Core Strategy due to concerns over flooding, distances to the town centre and schools and ecological concerns. This site was proposed for development in the Proposed Submission Local Plan with a reduced boundary taking

account of the areas affected by the flood zone and the ecological considerations. This part of the site is also closest to the town centre, supermarkets, the railway station and proposed employment areas to the south of the town.

- 5.18 The extended plan period (from 2026 to 2031) and the resultant need for additional growth led to some alternative sites previously excluded earlier in the process to be included in the Proposed Submission Local Plan.
- 5.19 Other examples of decisions relating to the options / alternatives taken forward as policies within the Local Plan include:
- For some issues, all options or a selection of options considered for a particular issue were taken forward as they provide beneficial effects and are not mutually exclusive. Examples of this relate to options for ecology, habitats and woodland, options for healthcare, education and recreation provision, climate change, historic environment, affordable housing and the role of main centres;
 - District Wide Distribution of Development: The chosen distribution limits environmental impacts and will meet some rural housing needs compared with the alternative options which were as follows:
 - Option 1: Distribute housing in accordance with the Structure Plan policy;
 - Option 2: Some reduction of growth at Banbury and Bicester and more growth at the larger settlements that can be well served by public transport;
 - Option 3: Some reduction of growth at Banbury and Bicester and more growth at the smaller villages in the interests of improving services and facilities including public transport.
 - Employment land in Banbury: the chosen strategy option for employment land in Banbury was taken forward as there will be limited additional impact on the landscape and development will fit in well to the existing urban form close to existing employment areas. The alternative option (Option 1) would have a significant impact on the landscape and lead to cross town journeys.

Proposed Changes to the Submission Local Plan – Focused Consultation (2013)

- 5.20 A schedule of Proposed Changes to the Cherwell Local Plan Proposed Submission was published for a Focused Consultation in March 2013, with an accompanying SA Report (March 2013). The Proposed Changes to the Cherwell Local Plan Proposed Submission included mainly minor clarifications to policy wording that were made as a result of the responses received to the consultation on the Local Plan Proposed Submission Document (2012), as well as publication of new evidence and to take into account the revocation of the South East Plan. No new policies or site allocations were proposed.

Submission Local Plan (2014)

- 5.21 The Local Plan that was submitted to the Secretary of State for Examination in January 2014 followed the same structure as the Proposed Submission Local Plan, 2012 summarised above (paragraph 5.12), and included tracked changes showing the Proposed Changes that were consulted upon during the Focused Consultation (2013).

Additional SA work for Main Modifications (2014)

Additional SA work

- 5.22 Following the initial examination hearings in June 2014, LUC undertook additional SA work on behalf of the Council as requested by the Inspector. This involved four main components of work:
1. Appraisal of reasonable alternatives for the additional quantum of housing and jobs to fully meet objectively assessed needs.
 2. Appraisal of reasonable alternatives for the spatial distribution of the additional development.
 3. Appraisal of reasonable alternatives for additional strategic development locations.
 4. Appraisal of proposed Main Modifications to the Submission Local Plan.

5.23 The alternatives considered under each component are summarised below, along with the reasons for selecting or rejecting each option.

1. Quantum of housing and jobs

Housing

5.24 The December 2013 SA Report appraised three alternatives for the quantum of housing (see Annex E of the SA Report), covering the period 2006 to 2031:

- The Proposed Growth Scenario in the Submission Local Plan: 670 dwellings per annum (annualised rate), giving a total of 16,750 dwellings over the plan period.
- Alternative 1: 590 dwellings per annum (annualised rate), giving a total of 14,750 dwellings over the plan period.
- Alternative 2: 800 dwellings per annum (annualised rate), giving a total of 20,000 dwellings over the plan period.

5.25 The December 2013 SA Report concluded:

"Although the Proposed Growth scenario and Alternative 2 score similarly within the SA, the proposed growth option delivers the most positive sustainability outcomes, providing sufficient housing to support the necessary economic growth in the district to 2031, while limiting environmental impacts as a result of less greenfield land being needed than under Alternative 2".

5.26 The reasonable alternative for the quantum of housing under consideration for the Main Modifications was based on the Oxfordshire SHMA published in April 2014. The objectively assessed need of 1,140 dwellings per annum contained in the SHMA was therefore considered to be the only reasonable option for housing growth. The figures of 1,090 and 1,190 were not alternatives as such but, rather, represent the lower and upper end of the range of need identified.

5.27 Assuming the objectively assessed need is met, the significant effects identified for Alternative 2 under the 2013 SA were considered likely to result from the Main Modification, except the effects are likely to be even more pronounced.

5.28 The Council proceeded with the reasonable alternative of seeking to meet the objectively assessed need identified in the Oxfordshire SHMA.

Jobs

5.29 The reasonable alternative to the Submission Local Plan for the quantum of jobs and employment land was developed following a review of the relevant evidence base and was to allow for additional employment land at Banbury and Bicester to accommodate the jobs forecasts and employment land need identified in the economic studies for the extended plan period up to 2031.

5.30 The Council proceeded with the reasonable alternative of allowing for more employment land at Banbury and Bicester as it was based on need for jobs identified in the up to date evidence studies.

2. Overall spatial distribution of development

5.31 This component of work focused on four options:

- Option A: Focus additional growth at Bicester.
- Option B: Focus additional growth at Banbury.
- Option C: Focus additional growth at Former RAF Upper Heyford.
- Option D: Provide for some additional growth in the Rural Areas.

5.32 The above options were identified as 'reasonable alternatives' for the reasons explained below. The options are not mutually exclusive, and the SA Addendum considered it likely that the most appropriate and sustainable strategy for accommodating the additional growth would be a combination of more than one of Options A to D.

5.33 The SA Addendum only considered growth in addition to the proposed development that was already included in the Submission Local Plan. The proposed development in the Submission Local Plan has already been subject to SA. The SA work undertaken during earlier stages in the

plan preparation was drawn upon to inform the findings of the work undertaken for the SA Addendum, as has the work undertaken for the SA Addendum of the strategic development locations (summarised below).

- 5.34 Given that the consideration of additional growth was to meet Cherwell's objectively assessed need only, it was considered that the reasonable alternatives for accommodating the additional growth required should be appraised within the overall framework of the Spatial Strategy as set out in the Submission Local Plan:
- The two towns in the District provide access to employment opportunities, services and facilities and the potential for additional infrastructure building on existing provisions. Former RAF Upper Heyford is an extensive previously developed site where a new settlement including a new school has been approved and is under construction. Although additional development in these locations could have economic, social and environmental impacts, they were considered to be reasonable locations in the District at which to consider additional growth.
 - Some additional development in rural areas could help sustain services and facilities and in some cases possibly increase the attractiveness of villages for new services and facilities. Not providing any additional development in rural areas, or providing very low levels of development, would not help meet the identified housing need in rural areas and would undermine the sustainability of rural communities generally. The affordability of housing would worsen and maintaining the viability of services and facilities would be made more difficult. However, very high levels of development in rural areas would have a significant impact on the character, appearance and environment of rural areas. It would lead to urbanisation of the countryside, unsustainable travel patterns, landscape and other environmental degradation. Villages in Cherwell do not have the infrastructure of urban areas nor the employment opportunities to sustain high levels of growth.
- 5.35 As stated in para 5.6 of the SA Addendum, separate countywide working will determine whether or not a strategic Green Belt Review is required to meet any unmet housing needs from elsewhere in Oxfordshire. Any future review of the Plan will require the cooperation of all authorities in Oxfordshire to meet the County's total housing need arising from the need assessed in the 2014 SHMA. This will include catering for the housing needs of Oxford City. A strategic Green Belt review is one of a number of options to consider in meeting the County's overall housing needs. All local authorities in Oxfordshire are working jointly to take forward the conclusions of the new Oxfordshire SHMA and the outcome of this joint work may lead to a strategic Green Belt review. A Core Planning Principle of the NPPF is to protect the Green Belts (para. 17) and the 'great importance' which the Government attaches to them is emphasised (para. 79). The supporting Planning Practice Guidance states, "Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the 'very special circumstances' justifying inappropriate development on a site within the Green Belt" (ID: 3-034-20140306). In this context, and in view of the existence of other non-Green Belt options at Bicester, Banbury, Former RAF Upper Heyford and elsewhere in the rural areas (as evidenced by the Submission SA, Strategic Housing Land Availability Assessment (SHLAA), representations, and evidence presented at the Local Plan Examination Hearings), it was considered that locating growth within the Green Belt was not a reasonable alternative.
- 5.36 None of the reasonable alternative options showed significant sustainability advantages over the others:
- Banbury is the largest town in the District, with the greatest range of jobs, services and facilities, but it is constrained topographically, and by other environmental issues, which suggests that it can accommodate some of the additional growth but not too big a proportion.
 - Bicester is less constrained than Banbury, although it still has significant constraints such as heritage interest and best and most versatile agricultural land. Additional development may help the town achieve more of a critical size in terms of providing for a good range of services and facilities, but too rapid or too large a scale of growth could place the services, facilities and infrastructure of the town under strain.
 - Former RAF Upper Heyford is already a growing community with both homes and jobs that could benefit from further growth in order to reach a size that allows residents to access

services and facilities locally rather than having to travel elsewhere. However, significant additional development could compromise the heritage and ecological interest of the site if not carefully planned and designed.

- The villages of the Rural Areas need more homes and jobs to cater for both demand and need, and also to help provide support for the diminishing range of local services and facilities that they offer. However, people will continue to need to access larger settlements, such as Banbury, Bicester and Oxford, to meet their everyday needs and employment, so large-scale development in the Rural Areas is probably not sustainable and would harm landscape character.

- 5.37 The SA Addendum concluded that the most sustainable solution is likely to be a balanced approach between all four of the reasonable alternative options, focusing initially on the two main towns particularly Bicester as it is less constrained than Banbury despite its smaller size, and then exploring the scope to deliver additional development at Former RAF Upper Heyford whilst respecting its heritage and ecological interest, and allowing for some additional development in the Rural Areas, but on a limited scale commensurate with the size, character and function of the villages concerned. This would probably provide the greatest chance for the potential positive effects to be realised and to manage any potentially significant adverse effects. To place too much emphasis on any one option would increase the risks of failing to deliver the positive effects, whilst increasing the likelihood of significant adverse effects occurring.
- 5.38 This approach was reflected by the Council in revised Policy BSC1: District Wide Housing Distribution in the Main Modifications, which provides for 44% of housing growth (including completions, permissions, allocations and allowance for windfalls) to be in and around Bicester, 32% around Banbury, and 24% in the remainder of the District (of which nearly half will be at Former RAF Upper Heyford in accordance with the proposed Main Modifications to Policy Villages 5).

3. Additional strategic development locations

- 5.39 The purpose of this component of work was to identify alternative strategic development locations for accommodating the additional housing and employment need in the district and consider whether they were 'reasonable' alternatives and to document this decision-making. The reasonable alternative strategic development locations accord with the overall spatial strategy in the Submission Local Plan, which focuses development on the two main towns of Bicester and Banbury, plus provision for strategic development at Former RAF Upper Heyford. Potential strategic development locations that did not accord with the overall spatial strategy, including strategic development in rural areas or through the strategic release of Green Belt land were not considered to be reasonable alternatives. Each reasonable alternative was appraised against the SA framework drawing on the earlier SA work where appropriate but also including alternatives that had not been appraised to date where they met the 'reasonableness' tests (summarised in Table 3.1 of this Adoption statement).
- 5.40 Alongside the SA of the reasonable alternative strategic development locations around Banbury, Bicester and Former RAF Upper Heyford, Cherwell District Council undertook its own planning assessment of the sites already allocated in the plan, discounted in earlier stages and/or put forward by developers. This involved updating the SHLAA, taking into account the findings of the SA work and updated work on the Habitats Regulations Assessment, County Council's transport assessments, Landscape Sensitivity and Capacity Assessment and Strategic Flood Risk Assessment. A summary of the reasons for selecting the preferred strategic development locations, and discounting other reasonable alternatives as provided by the Council is set out in Table 7.7 of the SA Addendum.
- 5.41 Drawing on this evidence base, the Council identified in the schedule of Main Modifications its preferred strategic development locations to allocate (and the amount of housing or employment land to be delivered), in addition to those already included in the Submission Local Plan, in order to meet the additional housing requirement set out for Cherwell in the Oxfordshire SHMA. The additional strategic development locations were set out in new policies introduced through the Proposed Main Modifications:
- Bicester 13 – Gavray Drive.
 - Banbury 15 - Employment Land North East of Junction 11.

- Banbury 16 – South of Salt Way – West.
- Banbury 17 – South of Salt Way – East.
- Banbury 18 – Land at Drayton Lodge Farm.
- Banbury 19 – Land at Higham Way.

5.42 The following allocations were also amended by the Council through the Main Modifications to change either the site area, number of homes to be provided, area of employment land and/or the policy requirements:

- SLE 1 – Employment Development.
- SLE 4 – Improved Transport and Connections
- Bicester 1 – North-West Bicester Eco-Town.
- Bicester 2 – Graven Hill.
- Bicester 10 – Bicester Gateway.
- Bicester 11 – Employment Land at North East Bicester.
- Bicester 12 – South East Bicester.
- Banbury 4 – Bankside Phase 2.
- Banbury 6 – North of Hanwell Fields.
- Policy Villages 5 – Former RAF Upper Heyford.

4. Main Modifications

5.43 Proposed Main Modifications to the Local Plan as submitted were prepared by Cherwell District Council. These set out changes identified before, during and soon after the Examination Hearings in June 2014 as well as changes which had resulted from the Objectively Assessed Housing Needs and the additional SA work described above. The proposed Main Modifications were shown in a schedule as changes to the Local Plan as submitted, including the Council's reasons for including the Main Modification. The August 2014 SA Addendum described whether or not any of the proposed Main Modifications to the Local Plan changed the findings set out in the previous 2013 SA Report.

5.44 The SA Addendum concluded that the Submission Local Plan, together with the proposed Main Modifications, includes mitigation and enhancement measures either within the new or revised policies or elsewhere in the Local Plan that should avoid significant adverse effects from occurring from the development proposed in the Submission Local Plan and proposed Main Modifications.

5.45 The main exception relates to development that will take place on greenfield, often agricultural land, for which no mitigation is possible. In these instances, **significant adverse effects** in relation to SA objective 8 (**efficient use of land**) will result. These relate primarily to the following allocations:

- Bicester 1 – North-West Bicester Eco-Town.
- Bicester 10 – Bicester Gateway.
- Bicester 11 – Employment Land at North East Bicester.
- Bicester 12 – South East Bicester.
- Banbury 4 – Bankside Phase 2.
- Banbury 15 – Employment Land North East of Junction 11.
- Banbury 16 – South of Salt Way – West.
- Banbury 17 – South of Salt Way – East.
- Banbury 18 – Land at Drayton Lodge Farm.

- 5.46 The assessment of residual effects assumed that all development is delivered in accordance with the policies in the Local Plan as a whole, and that the mitigation and enhancement measures are effective.

Local Plan Adoption (2015)

- 5.47 The Inspector's Report published 9th June 2015 concluded that the Cherwell Local Plan provides an appropriate basis for the planning of the District to 2031, providing a number of modifications are made. Almost all of the modifications were proposed by the Council, but where necessary for soundness, the Inspector amended and/or deleted wording where required (including deletion of Policy ESD 15). The Inspector recommended the inclusion of the modifications after considering all the representations from all other parties on these issues.

- 5.48 The Inspector notes at paragraphs 4 and 5 of his Report:

"The main modifications that are necessary for soundness are set out in the Appendix and all relate to matters that were discussed at the Examination hearings. Pages 126 onwards of the Appendix deal with consequential amendments to the Policies Map that are a matter for the Council and not part of my formal recommendations. The Council prepared a schedule of proposed main modifications, as well as carrying out a further Sustainability Appraisal (SA), which were subject to public consultation for six weeks.

I have taken account of all the consultation responses in coming to my conclusions in this report and in this light I have made some amendments to the main modifications where necessary for soundness, consistency and/or clarity. None of these amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and SA that has been undertaken..."

- 5.49 The Main Modifications recommended by the Inspector are summarised as follows:

- Increase the total number of new houses to 22,840, 2011 – 2031, (1,140 per year) from 16,750, 2006 – 2031 (670 per year) in the submitted plan to meet the full, up to date, objectively assessed needs of the district, including for affordable housing.
- Allocate additional strategic housing sites at Banbury and Bicester and extend others to meet the above, using the sustainable opportunities available to improve delivery in accord with an amended new Housing Trajectory and Infrastructure Delivery Plan, as well as the designation of Bicester as a "Garden City" by government.
- Extend the site of, and increase the expected total of new homes from, the former RAF Upper Heyford site (policy Villages 5) to help meet the increased local housing needs.
- Allocate land at J11, M40 for additional employment development at Banbury (policy Banbury 15), but on a smaller scale than that proposed by the Council, which is not fully justified or necessary in the plan period.
- Add a formal commitment from the Council, together with other relevant Councils, to undertake a joint review of the boundaries of the Oxford Green Belt, once the specific level of help required by the city of Oxford to meet its needs that cannot reasonably be met within its present confines, is fully and accurately defined.
- Delete Policy ESD 15 (The Urban-Rural Fringe), it is considered unnecessary at this stage by the Inspector, as Policy C15 of the adopted LP 1996 will also continue to apply to help prevent coalescence between settlements, pending completion of the LP Part 2 and all the other relevant policies including ESD 13 which addresses some of the same matters should be suitable and sufficient in practice to protect vulnerable gaps between settlements from inappropriate development and avoid coalescence.

- 5.50 Cherwell District Council has incorporated all of the modifications set out in the Inspector's Report into the Adopted version of the Cherwell Local Plan 2011-2031 Part 1, July 2015.

- 5.51 Two of the Main Modifications recommended by the Inspector were not proposed by the Council and are therefore not referred to in the October 2014 SA Addendum. They are the reduction in area of the allocation of land at J11, M40 (Policy Banbury 15) and the deletion of Policy ESD 15.

- 5.52 The smaller site area that the Inspector recommends for allocation in Policy Banbury 15 was appraised as part of the Initial SA Addendum published for consultation in August 2014, and the appraisal matrix (Site BAN 7 Land East of the M40) is provided in Appendix 5 of both the August 2014 Initial SA Addendum (page 121) and updated October 2014 SA Addendum (page 153).
- 5.53 The smaller site area allocated in Policy Banbury 15 reduces the potential for minor negative effects on the landscape that were identified in the SA Addendum in relation to the larger site that was proposed to be allocated in Policy Banbury 15 through the Council's Main Modifications. It also reduces the significance of the statement made at paragraph 8.14 of the October 2014 SA Addendum that, *"with respect to the new site allocation Banbury 15 – Employment Land North East of Junction 11, this is the first significant scale of development that has been allocated to the east of the M40 at Banbury. As a result, it could be considered that now this 'boundary' will be breached, it opens up the greater likelihood for additional development east of the M40 in the future."* This is because the smaller site area, while still east of the M40, is bounded to the east by the A361, and is in the part of the site which was found to have medium capacity for commercial or industrial units⁴. However, as the smaller site area is still on greenfield land, the residual significant negative effect identified in the October 2014 SA Addendum (paragraph 8.12) in relation to SA objective 8 (**efficient use of land**) would still result.
- 5.54 With respect to the deletion of policy ESD 15 (The Urban-Rural Fringe), it is not considered that the deletion of this policy will change the overall findings for Theme 3 in Table B6 of the 2013 SA Report, because protection of the setting of settlements, gaps between settlements from inappropriate development and avoiding coalescence would still be achieved by other policies within Theme 3 of the Local Plan Part 1 (in particular Policy ESD 13 and saved Policy C15 of the adopted Local Plan, 1996). In addition, the Inspector notes at paragraph 106 of his Report: *"A reworded policy applying only to specific locations meeting the narrower definition of "valued landscapes" (para 80) and/or "areas of environmental or historic significance" (para 157) as defined in the NPPF, particularly around Banbury and Bicester, could be considered by the Council once the local needs of villages have been assessed to identify where development would be inappropriate, for inclusion in the Local Plan Part 2."*
- 5.55 Therefore, any new policy to be developed would be assessed during the Sustainability Appraisal of the Local Plan Part 2.

⁴ WYG (August 2014) *Cherwell District Council, Banbury Landscape Sensitivity and Capacity Assessment Addendum*

6 How will the environmental and sustainability effects of the Local Plan Part 1 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 Government's latest SA Guidance in the National Planning Practice Guidance⁵ states that details of the proposals for monitoring the significant effects of implementing the adopted local plan should be included in the Sustainability Appraisal report, or the post-adoption statement (i.e. this document). Annex F of the 2013 SA Report for the Proposed Submission Local Plan addressed this requirement, presenting a draft monitoring framework and stating that the final SA monitoring programme would be included in the SA Adoption Statement to reflect any changes made during the Examination stage prior to Adoption of the Local Plan. The draft monitoring framework presented monitoring proposals for the likely significant effects identified in the SA. It took the approach of identifying the Local Plan themes likely to have a significant effect and the SA objectives for which likely significant effects were identified.
- 6.3 The SA Addendum also recommended that a monitoring framework for the Local Plan should be included in the SA Adoption Statement. Therefore this section sets out the detailed monitoring proposals for the Cherwell Local Plan (2011-2031) Part 1.
- 6.4 The SA Addendum concluded that the Submission Local Plan, together with the proposed Main Modifications, includes mitigation and enhancement measures either within the new or revised policies or elsewhere in the Local Plan that should avoid significant adverse effects from occurring from the development proposed in the Submission Local Plan and proposed Main Modifications.
- 6.5 The main exception relates to development that will take place on greenfield, often agricultural land, for which no mitigation is possible. In these instances, **significant adverse effects** in relation to SA objective 8 (**efficient use of land**) will result. Therefore, in terms of meeting the SEA Regulations, the Council may only be required to monitor specifically how much greenfield land and of what grade of agricultural land is lost due to implementation of the Local Plan policies, in particular at the following allocations:
- Bicester 1 – North-West Bicester Eco-Town
 - Bicester 10 – Bicester Gateway.
 - Bicester 11 – Employment Land at North East Bicester.
 - Bicester 12 – South East Bicester.
 - Banbury 4 – Bankside Phase 2.
 - Banbury 15 – Employment Land North East of Junction 11.
 - Banbury 16 – South of Salt Way – West.
 - Banbury 17 – South of Salt Way – East.
 - Banbury 18 – Land at Drayton Lodge Farm.
- 6.6 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*

⁵ <http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-local-plans/>

action, it is considered more precautionary for the Council to monitor the potential sustainability effects of the Local Plan through the use of indicators relating to each of the SA objectives.

- 6.7 **Table 6.1** below sets out proposed monitoring indicators relating to each of the SA objectives. By monitoring the effects of the Local Plan Part 1 on the SA objectives, rather than focusing on the specific likely significant effects identified through the SA, other significant effects which may not have been anticipated will be able to be monitored. Therefore, monitoring indicators are suggested for all of the objectives in the SA framework.
- 6.8 To achieve efficiencies, and ensure environmental effects of implementing any of the Local Plan Part 1 policies are monitored, SA monitoring of the Local Plan should be conducted as part of the overall approach to monitoring achievement of the Local Plan objectives. Section E and Appendix 6 of the Local Plan Part 1 presents a Monitoring Framework, which will be used to record and assess the implementation of the Local Plan Part 1. The indicators in **Table 6.1** draw from the Local Plan indicators as appropriate, and may be repeated where they would contribute to monitoring more than one SA objective. Note that the relevant targets for each indicator are set out in Appendix 6 of the Local Plan Part 1. For SA Objectives 5 (crime) and 14 (waste) there are no relevant indicators proposed in Appendix 6 of the Local Plan Part 1, therefore, suggested indicators have been noted in *italics*.

Table 6.1 Proposed monitoring indicators for monitoring the effects of the Local Plan Part 1 on the SA objectives

SA Objective	Suggested indicators (and Policy Reference from Local Plan Part 1)
1. To ensure that everyone has the opportunity to live in a decent, sustainably constructed and affordable home .	<ul style="list-style-type: none"> • Housing commitments and completions per sub area (Banbury, Bicester, Kidlington, rural areas) (Policy BSC1). • Net affordable housing completions/acquisitions per tenure (Policy BSC3). • Number of 'extra care' completions (Policy BSC4). • Completed/Lost Gypsy & Traveller Plots/Travelling Showpeople Pitches, by location (location criteria as set out in Policy BSC6).
2. To reduce the risk of flooding and resulting detriment to public well-being, the economy and the environment	<ul style="list-style-type: none"> • Permissions granted contrary to Environment Agency advice on Flood Risk grounds (Policy ESD1 and ESD6). • Flood Risk Assessments received for development proposals within Flood Zones 2 & 3, within 1 ha of Flood Zone 1, or 9m of any watercourse (Policy ESD6). • Completed SuDS schemes in the district (Policy ESD7).
3. To improve the health and well-being of the population & reduce inequalities in health.	<ul style="list-style-type: none"> • Completed health care infrastructure (Policy BSC8). • Completions at Bicester Community Hospital (Policy BSC8). • Amount, type and location of open space/sport/recreation facilities (Policy BSC10). • Areas deficient in recreation provision by type and amount (Policy BSC10). • Open spaces in the district meeting quality standards (Policy BSC10). • Completed green infrastructure schemes (Policy ESD17).
4. To reduce poverty and social exclusion .	<ul style="list-style-type: none"> • Completed development per type in the 'area of renewal' (Policy BSC5). • The 'Brighter Futures in Banbury' Performance Measures Package Reports (Policy BSC5).
5. To reduce crime and disorder and the fear of crime.	<ul style="list-style-type: none"> • <i>Crime levels in Cherwell District.</i>

SA Objective	Suggested indicators (and Policy Reference from Local Plan Part 1)
6. To create and sustain vibrant communities and engage cultural activity across all sections of the Cherwell community	<ul style="list-style-type: none"> • Permissions granted contrary to design consultee advice on design grounds (Policy ESD15).
7. To improve accessibility to all services and facilities.	<ul style="list-style-type: none"> • Completed education infrastructure (Policy BSC7). • Completed health care infrastructure (Policy BSC8). • Amount, type and location of open space/sport/recreation facilities (Policy BSC10). • Areas deficient in recreation provision by type and amount (Policy BSC10). • Completed built development on (former) sites of open space, outdoor sport and recreation (Policy BSC10). • Completed community facilities infrastructure (Policy BSC12). • Access to services and facilities by public transport, walking and cycling (Policy ESD1). • % of permitted and completed developments with Design and Access Statements (that address the criteria of policy ESD15). • Completed green infrastructure schemes (Policy ESD17).
8. To improve efficiency in land use through the re-use of previously developed land and existing buildings, including the re-use of materials from buildings, and encouraging urban renaissance.	<ul style="list-style-type: none"> • % of residential completions on previously developed land (Policy BSC2). • Net housing density of completions (Policy BSC2). • Completed development (per type) in the Green Belt (Policy ESD14). • Permissions granted contrary to design consultee advice on design grounds (Policy ESD15).
9. To reduce air pollution including reducing greenhouse gas emissions and ensure the district is ready for its impacts	<ul style="list-style-type: none"> • Carbon emissions in the district per capita (Policy ESD1).
10. To conserve and enhance and create resources for the district's biodiversity	<ul style="list-style-type: none"> • Number of permissions granted contrary to consultee (Environment Agency, BBOWT, CDC/OCC etc.) advice on water quality grounds within the SAC catchment (Policy ESD9). • Total Local Wildlife Site/Local Geological Site area (Policy ESD10). • Changes in priority habitats by number & type (Policy ESD10). • Changes in priority species by number & type (Policy ESD10). • Ecological condition of SSSIs (Policy ESD10). • Distribution and status of farmland birds (Policy ESD10). • Distribution and status of water voles (Policy ESD10). • Permissions granted contrary to tree officer advice (Policy ESD10). • Permissions granted contrary to biodiversity consultee advice (Policy ESD10). • Number of Ecological Surveys submitted with applications (Policy ESD10).

SA Objective	Suggested indicators (and Policy Reference from Local Plan Part 1)
	<ul style="list-style-type: none"> • Local Sites in Positive Conservation Management (Policy ESD10). • Total amount of Natural Environment and Rural Communities (NERC) Act s41 Habitats of Principal Importance within active Conservation Target Areas (CTAs) (Policy ESD11). • Permissions granted in Conservation Target Areas contrary to biodiversity consultee advice (Policy ESD11). • Completed green infrastructure schemes (Policy ESD17).
<p>11. To protect, enhance and make accessible for enjoyment, the district's countryside and historic environment.</p>	<ul style="list-style-type: none"> • Built development permitted in the AONB (Policy ESD12). • Permissions granted contrary to the advice of the AONB Management Board (Policy ESD12). • Number and location of urban fringe restoration/improvement schemes completed (Policy ESD13). • Permissions granted contrary to Landscape Officer advice (Policy ESD13). • Permissions granted contrary to the advice of Historic England/consultee advice on heritage grounds (Policy ESD15). • Number of new (and reviews of) conservation area appraisals (Policy ESD15). • Permissions granted contrary to consultee advice on heritage grounds (in relation to the Oxford Canal – Policy ESD16). • Completed green infrastructure schemes (Policy ESD17).
<p>12. To reduce road congestion and pollution levels by improving travel choice, and reducing the need for travel by car/ lorry</p>	<ul style="list-style-type: none"> • Access to services and facilities by public transport, walking and cycling (Policy ESD1). • Completed transport improvement schemes (Policy SLE4). • Level of Council involvement with the proposed High Speed Rail Link (Policy SLE5).
<p>13. To reduce the global, social and environmental impact of consumption of resource by using sustainably produced and local products.</p>	<ul style="list-style-type: none"> • Completed non-residential development achieving BREEAM Very Good, BREEAM Excellent (Policy ESD3).
<p>14. To reduce waste generation and disposal, and achieve the sustainable management of waste</p>	<ul style="list-style-type: none"> • <i>% of household waste sent for re-use, recycling and compost.</i> • <i>% of Construction and demolition waste re-used.</i>
<p>15. To maintain and improve the water quality of the district's rivers and to achieve sustainable water resources management</p>	<ul style="list-style-type: none"> • % of new dwellings completed achieving water use below 110 litres/person/day (Policy ESD3). • Completed SuDS schemes in the district (Policy ESD7). • Number of permissions granted contrary to Environment Agency advice on water quality grounds (Policy ESD8). • Number of permissions granted contrary to consultee (Environment Agency, BBOWT, CDC/OCC etc.) advice on water quality grounds within the SAC catchment (Policy ESD9).

SA Objective	Suggested indicators (and Policy Reference from Local Plan Part 1)
16. To increase energy efficiency and the proportion of energy generated from renewable sources in the district	<ul style="list-style-type: none"> • Number of Energy Statements submitted (Policy ESD2). • Number of District Heating Feasibility Assessments submitted (Policy ESD4). • Number of permitted district heating schemes in the district (Policy ESD4). • Permitted renewable energy capacity per type (Policy ESD5).
17. To ensure high and stable levels of employment so everyone can benefit from the economic growth of the district.	<ul style="list-style-type: none"> • Employment commitments and completions on allocated employment land per sub area (Banbury, Bicester, Kidlington, Rural Areas) (Policy SLE1). • Employment commitments and completions on non-allocated employment land per sub area (Banbury, Bicester, Kidlington, Rural Areas) (Policy SLE1). • Completions resulting in a loss of employment use to non-employment use per sub area (Banbury, Bicester, Kidlington, Rural Areas) (Policy SLE1).
18. To sustain and develop economic growth and innovation, an educated/skilled workforce and support the long term competitiveness of the district.	<ul style="list-style-type: none"> • Town centre use (use classes A1-A5, B1a, D2) completions within and outside of each of the town centres (Policy SLE2). • No. of retail impact assessments submitted with planning applications (Policy SLE2).
19. To encourage the development of buoyant, sustainable tourism sector.	<ul style="list-style-type: none"> • Completed transport/recreation/leisure/tourism uses within 1km of the Oxford Canal (Policy ESD16). • Completed tourism developments (D use class uses, Sui Generis uses) (Policy SLE3). • Number of visitors to tourist attractions in the district (Policy SLE3). • Number of overnight stays within the district (Policy SLE3).

LUC

July 2015