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Cherwell Local Plan Part 1 Partial Review

Sustainability Appraisal Addendum – Proposed Changes to the Proposed Submission Cherwell Local Plan Part 1 Partial Review

Prepared by LUC
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Sustainability Appraisal Addendum

Introduction

- 1.1 Cherwell District Council commissioned LUC in October 2015 to carry out a Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) of the Cherwell District Local Plan Part 1 Partial Review. There have been three key stages in the Sustainability Appraisal of the Local Plan Part 1 Partial Review to date:
- A SA Scoping Report was prepared and consulted upon with an Issues Paper in January 2016.
 - An initial SA Report was prepared and consulted upon with an Options Paper in November 2016.
 - A full SA Report was then prepared and consulted upon with the Local Plan Part 1 Partial Review Proposed Submission document in June 2017.
- 1.2 This addendum provides a summary of the relevant plan-making developments since the publication the Local Plan Part 1 Partial Review Proposed Submission document in June 2017 and considers their potential implications in SA terms. A separate Non-technical summary has also been produced. These documents sit alongside the SA Report and associated non-technical summary published in June 2017.

Consultation Update

- 1.3 Following each stage of consultation, all representations related to the SA process have been reviewed. Appendix 3 of the SA Report, consulted upon alongside the Proposed Submission document in June 2017, contains a summary of the representations received during the consultations on the Scoping Report and initial SA Report. A response was provided for each representation, including a summary of any updates made to the SA Report as a result of the consultation comments.
- 1.4 A similar schedule of SA-related representations received during the consultation on the Local Plan Part 1 Partial Review Proposed Submission document has been prepared and is available at **Appendix 1**. This schedule includes responses to representations received; however, **no updates to the SA Report were considered necessary following this consultation**.

Evidence Update

- 1.5 Since the publication of the Local Plan Part 1 Partial Review Proposed Submission document in June 2017, the following additional evidence documents of relevance to the SA have been prepared:
- Cherwell Water Cycle Study (November 2017).
 - Hydrological and Hydrogeological Study for site PR8 (February 2018).
 - Housing and Economic Land Availability Assessment (HELAA) (February 2018).

Cherwell Water Cycle Study

- 1.6 Paragraph 3.42 of the 2017 SA Report sets out the baseline with regards to wastewater treatment capacity in the District. The November 2017 Water Cycle Study (WCS) identifies that four (rather than six, as stated in the SA) Wastewater treatment works (WwTWs) (Banbury, Bloxham, Former RAF Upper Heyford and Woodstock) have potential to contribute to significant water quality impacts on the receiving watercourse, if capacity is utilised in line with currently proposed growth.

However, as the WCS still concludes that feasible solutions are available to ensure legislative objectives are met, therefore the November 2017 WCS does not affect the conclusions of the 2017 SA Report.

Hydrological and Hydrogeological Study

- 1.7 Natural England's representation advised that further information regarding potential hydrological impacts on the Rushy Meadows SSSI was needed to ensure that the quantum of development allocated was deliverable without a significant impact. A Hydrological and Hydrogeological Study was therefore commissioned which concluded:
- 1.8 *"Although a potential hydrogeological connection via superficial sands and gravels is assumed to be present between Rushy Meadows SSSI and the proposed PR8 development land to the south, significant hydrological and hydrogeological linkages were not identified. As a consequence, adverse impacts to Rushy Meadows SSSI as a consequence of the proposed development are considered Negligible."*
- 1.9 The study indicates that whilst it is possible that groundwater abstraction could lower groundwater levels within the SSSI, the extent of the impact would be dependent upon the nature of the abstraction or dewatering activity. The consideration of mitigation measures to control dewatering operations during construction was therefore recommended and reflects in change FC56 in **Table 1.1**.

Housing and Economic Land Availability Assessment (HELAA)

- 1.10 The Council has updated its HELAA following representations received.
- 1.11 These new evidence bases inform the Local Plan Part 1 Partial Review; however, **it is not considered that the information they contain materially affects the baseline of the SA.**

Effects of Proposed Changes to the Local Plan Part 1 Partial Review Proposed Submission Document

- 1.12 Following consultation on the Local Plan Part 1 Partial Review Proposed Submission document, Cherwell District Council have prepared a schedule of proposed changes and the reasoning behind each proposed change.
- 1.13 LUC have reviewed changes to the previously appraised elements of Local Plan Part 1 Partial Review Proposed Submission document to consider their effects, individually and as part of the Local Plan as a whole, if adopted. **Table 1.1** sets out the proposed changes to the previously appraised elements (policies and related policy maps) of the Plan and their potential effects if adopted. Directly after the table, consideration is given to the in-combination effects of adopting all of the proposed changes.

Table 1.1: Proposed changes to previously appraised elements of the Local Plan Part 1 Partial Review and their effects¹

Ref. No. ²	Part 1 Review Policy	Reference	Proposed Change	Reason	SA Effect
FC09	Policy PR1 - Achieving Sustainable Development for Oxford's Needs	Point (a)	Amend to read '4,400 homes to help meet Oxford's unmet housing needs and necessary supporting infrastructure by 2031.	Clarification / Representation (PR-C-1400) on behalf of Kidlington Parish Council and PR-C-1521 from Alaric Rose	This change would further contribute to positive effects identified, particularly with regards to SA objectives 1 (Building Sustainable and Affordable Homes), 6 (accessibility to services and facilities), 2 (Improving Health and Well Being) and 5 (vibrant communities). However, there would be no changes in the significance of these effects.
MM21	Policy PR3: The Oxford Green Belt	Point (b)	Amend to read: '0.7 hectares of land adjoining and to the west of the railway (to the east of the strategic development site allocated under policy PR8 as shown on inset Policies Map PR8 the map at Appendix 2)	Presentational updating reflecting the effect of removing land from the Green Belt that is not safeguarded beyond the Plan period	No effect.
MM22	Policy PR3: The Oxford Green Belt	Point (c)	Amend to read: '11.8 hectares of land south of the A34 and west of the railway line (to the west of the strategic development site allocated under policy PR6b as shown on inset Policies Map PR6b the map at Appendix 2) '	Presentational updating reflecting the effect of removing land from the Green Belt that is not safeguarded beyond the Plan period	No effect.
MM23	Policy PR3: The Oxford Green Belt	Point (d)	Amend to read: '9.9 hectares of land comprising the existing Oxford Parkway Railway Station and the	Presentational updating reflecting the effect of	No effect.

¹ Where the proposed change(s) would lead to a change in SA scoring, this has been highlighted in the 'SA Effect' column by use of **bold** text.

² This reference corresponds to that given in the Council's schedule of Proposed Focused Changes and Minor Modifications (February 2018)

Ref. No. ²	Part 1 Review Policy	Reference	Proposed Change	Reason	SA Effect
			Water Eaton Park and Ride (as shown on inset Policies Map 6a the map at Appendix 2)'	removing land from the Green Belt that is not safeguarded beyond the Plan period	
MM24	Policy PR3: The Oxford Green Belt	Point (e)	Amend to read: '14.7 hectares of land to the the north, east and west of Begbroke Science Park (as shown on inset Policies Map PR3 the map at Appendix 2)'	Typo and presentational updating reflecting the effect of removing land from the Green Belt that is not safeguarded beyond the Plan period	No effect.
FC13	Policy PR5: Green Infrastructure	Point (1)	Amend to read, 'Applications will be expected to: (1) Identify existing GI and its connectivity and demonstrate how this will, as far as possible, as possible, be protected and incorporated into the layout, design and appearance of the proposed development'.	Plan improvement / BBOWT Representation (PR-C-0766)	This change would further contribute to positive effects identified by adding more certainty as to the provision of GI. However, there would be no changes in the significance of these effects.
FC14	Policy PR5: Green Infrastructure	Point (8)	Amend to read 'Demonstrate where multi-functioning GI can be achieved, <u>including helping to address climate change impacts and taking into account best practice guidance.</u>	Plan improvement / Informed by representations (PR-C-0832) from Oxfordshire County Council / and Sport England (PR-C-1403)	This change would further contribute to positive effects identified. However, there would be no changes in the significance of these effects.
FC15	Policy PR5: Green Infrastructure	Point (9)	Amend to read: 'Provide details of how GI will be maintained and managed <u>in the long term.</u> '	Plan improvement / Representation (PR-C-0766) from BBOWT	This change would further contribute to positive effects identified. However, there would be

Ref. No. ²	Part 1 Review Policy	Reference	Proposed Change	Reason	SA Effect
					no changes in the significance of these effects.
FC17	Policy PR6a – Policies Map	Land East of Oxford Road	Reduce land allocation for primary school use from 3 hectares to 2.2 hectares. Allocate 0.8 hectares to residential use.	Plan improvement / Update from / discussion with OCC PR-C- 0832	No change to SA, as the same number of homes will be delivered and a primary school will still be delivered. The area of the site that is developed will remain the same, but the use of space will be different. However, this will not affect the conclusions of the SA.
MM27	Policy PR6a – Policies Map	Policy PR6a	<ul style="list-style-type: none"> - Remove constraint falling within Oxford City Council’s administrative boundary - Reduce the primary school land allocation by 0.8ha and increase the residential area allocation by 0.8ha 	<p>In response to a request from Oxford City Council</p> <p>In response to representation from / discussion with Oxfordshire County Council</p>	No effect (see row above).
FC18	Policy PR6a	Point 1	Amend to read ‘Construction of 650 dwellings (net) on approximately 245 hectares of land (the residential area as shown). The dwellings are to be constructed at an approximate average net density of 40 dwellings per hectare	Plan improvement	No effect. This reflects the change of land discussed with regards to FC17 and MM27 above.
FC19	Policy PR6a	Point 3	The provision of a primary school with at least three two forms of entry on 32.2 hectares of land in the location shown.	Plan improvement / Update from / discussion with OCC PR-C- 0832	No change to SA as a primary school will still be provided. The SA process is not fine grained enough to account for how many forms a

Ref. No. ²	Part 1 Review Policy	Reference	Proposed Change	Reason	SA Effect
					school will provide.
FC20	Policy PR6a	Point 7	Amend first sentence to read, '...pedestrian, wheelchair and all-weather cycle route along the site's eastern boundary <u>within the area of green space</u> as shown <u>on the policies map.</u> '	Consistency	No effect.
FC21	Policy PR6a	Point 10. (b)	<u>Two p</u> Points of vehicular access and egress from and to existing highways, primarily from Oxford Road.	Plan improvement Requested by OCC PR-C- 0832	No effect.
FC22	Policy PR6a	Point 10 (c)	Amend to read 'An outline scheme for public vehicular, cycle, pedestrian and wheelchair connectivity within the site, to the built environment of Oxford, to Cutteslowe Park, to the allocated site to the west of Oxford Road (policy PR6b) enabling connection to Oxford City Council's allocated 'Northern Gateway' site, to Oxford Parkway and Water Eaton Park and Ride, and to existing or new points of connection off-site and to existing or potential public transport services. <u>Required access to existing property via the site should be maintained.</u> '	Representation PR-C-0574	No effect.
FC23	Policy PR6a	Point 13	Amend to read 'The application(s) shall be supported by a phase 1 habitat survey including habitat suitability index (HSI) survey for great crested newts, <u>and protected and notable species</u>	Clarification / BBOWT Representation PR-C-0766	This change would further contribute to positive effects identified for SA objective 7 (Conserving and Enhancing Biodiversity) by adding more clarity

Ref. No. ²	Part 1 Review Policy	Reference	Proposed Change	Reason	SA Effect
			<u>surveys as appropriate, including for</u> great crested newt presence/absence surveys (dependent on HSI survey), surveys for badgers, breeding birds and reptiles, an internal building assessment for roosting barn owl, a tree survey and an assessment of the watercourse that forms the south-eastern boundary of the site and Hedgerow Regulations Assessment”.		that a range of protected and notable species surveys may be appropriate. However, there would be no changes in the significance of these effects.
FC24	Policy PR6a	Point 15	Amend to read 'The application shall be supported by a Heritage Impact Assessment which will <u>include identify</u> measures to avoid or minimise conflict with the identified heritage assets within the site, particularly the Grade 2* Listed St Frideswide Farmhouse. <u>These measures shall be incorporated or reflected, as appropriate, in any proposed development scheme.'</u>	As requested by Heritage England.	This change would further contribute to the positive effect identified (as part of a mixed effect) against SA objective 9 (Protecting and Enhancing the Historic Environment), as it adds more certainty that appropriate mitigation measures would be implemented. However, there would be no changes in the significance of these effects.
FC25	Policy PR6a	Point 17	Amend to read 'The application should demonstrate that Thames Water and the Environment Agency have been consulted regarding wastewater treatment capacity, and that Thames Water has agreed <u>agreement has been reached</u> in principle that foul drainage from the site will be accepted into <u>the drainage its</u> network.'	Representations from Natural England & recommendation from Water Cycle Study	No effect.
FC26	Policy PR6a	Point 18	Amend to read'...mitigation measures. <u>The outcomes of the investigation and mitigation</u>	As requested by Heritage England.	This change would further contribute to the positive effect

Ref. No. ²	Part 1 Review Policy	Reference	Proposed Change	Reason	SA Effect
			<u>measures shall be incorporated or reflected, as appropriate, in any proposed development scheme.</u>		identified (as part of a mixed effect) against SA objective 9 (Protecting and Enhancing the Historic Environment), as it adds more certainty that appropriate mitigation measures would be implemented. However, there would be no changes in the significance of these effects.
FC27	Policy PR6a	New Point	Add new point 20 to read ' <u>The application shall include a management plan for the appropriate re-use and improvement of soils.</u> ' Re-number subsequent points.	Plan Improvement / Representation from Daniel Scharf / SEA mitigation	Whilst it is acknowledged that this change may help to mitigate/compensate for loss of agricultural land, there would be no change to the effects recorded against SA objective 13 (Efficient Use of Land).
FC28	Policy PR6a	Point 28	Amend to read 'The location of archaeological features, including the tumuli to the east of the Oxford Road, should be <u>incorporated and</u> made evident in the landscape design of the site.'	As requested by Heritage England.	This change would further contribute to the positive effect identified (as part of a mixed effect) against SA objective 9 (Protecting and Enhancing the Historic Environment), as it adds more certainty that sensitive landscape design would be implemented. However, there would be no changes in the significance of these effects.
FC29	Policy PR6b	Point 1	Amend to read: 'Construction of 530 dwellings (net) on 32 hectares of land (the residential area as shown). The dwellings are to be constructed at an approximate average net density of 25 dwellings per hectare.	Plan improvement	No effect.

Ref. No. ²	Part 1 Review Policy	Reference	Proposed Change	Reason	SA Effect
FC30	Policy PR6b	Point 8(b)	Amend to read ' Two p Points of vehicular access and egress from and to existing highways, primarily from Oxford Road, and connecting within the site.	Request from OCC.	No effect.
FC31	Policy PR6b	10 (j)	Amend to read: ' examination of the opportunity to provide wildlife corridors over or under the A34 and A4260 (Frieze Way) to Stratfield Brake proposed District Wildlife Site."	Stratfield Brake District Wildlife Site has yet to be assessed against the list of criteria for District Wildlife Site designation by a site selection panel.	No effect on assessment, but it is acknowledged that Stratfield Brake District Wildlife Site is not currently designated and proposed only.
FC32	Policy PR6b	Point 11	Amend to: 11. The application(s) shall be supported by a phase 1 habitat survey including habitat suitability index (HSI) survey for great crested newts, and protected and notable species surveys as appropriate, including great crested newt presence/absence surveys (dependent on HSI survey), surveys for badgers, breeding birds and reptiles, an internal building assessment for roosting barn owl, a tree survey and an assessment of water bodies.	Representation from BBOWT PR-C-0766.	This change would further contribute to the positive effect identified (as part of a mixed effect) for SA objective 7 (Conserving and Enhancing Biodiversity) by adding more clarity that a range of protected and notable species surveys may be appropriate. However, there would be no changes in the significance of this effect.
FC33	PR6b	Point 13	Amend to read 'The application(s) shall be supported by a desk-based archaeological investigation which may then require predetermination evaluations and appropriate mitigation measures. The outcomes of the investigation and mitigation measures shall	Request from Heritage England.	This change would further contribute to the positive effect identified (as part of a mixed effect) against SA objective 9 (Protecting and Enhancing the Historic Environment), as it adds more certainty that appropriate mitigation

Ref. No. ²	Part 1 Review Policy	Reference	Proposed Change	Reason	SA Effect
			<u>be incorporated or reflected, as appropriate, in any proposed development scheme.'</u>		would be implemented. However, there would be no changes in the significance of these effects.
FC34	Policy PR6b	Point 15	Amend to read 'The application should demonstrate that Thames Water and the Environment Agency have been consulted regarding wastewater treatment capacity, and that Thames Water has agreed <u>agreement has been reached</u> in principle that foul drainage from the site will be accepted into the drainage its network.'	Representations from Natural England & recommendation from Water Cycle Study.	No effect.
FC35	Policy PR6b	New Point	Add new point 16 to read ' <u>The application shall include a management plan for the appropriate re-use and improvement of soils.</u> Re-number subsequent points.	Plan Improvement / Representation from Daniel Scharf / SEA mitigation.	Whilst it is acknowledged that this change may help to mitigate/compensate for loss of agricultural land, there would be no change to the effects recorded against SA objective 13 (Efficient Use of Land).
MM28	Policy PR6b –Policies Map	Policy PR6b –Policies Map	Remove constraint falling within Oxford City Council's administrative boundary	In response to a request from Oxford City Council	No effect.
FC36	Policy PR6c	Whole Policy	Amend to read: 'Land at Frieze Farm will be reserved for the potential construction of a golf course should this be required as a result of the development of Land to the West of Oxford Road under Policy PR6b. <u>Planning Application Requirements</u>	Consistency / Plan improvement Representation PR-C-0305 from Historic England Representation PR-	This change is expected to lead to minor positive effects for SA objective 10 (Reducing Road Pollution and Congestion), as points 1 (c), 1 (d) and 7 promote sustainable modes of transport as a means of travelling to and from the site. This change would further

Ref. No. ²	Part 1 Review Policy	Reference	Proposed Change	Reason	SA Effect
			<p>1. The application will be expected to be supported by, and prepared in accordance with, a Development Brief for the entire site to be jointly prepared and agreed in advance between the appointed representative(s) of the landowner(s) and Cherwell District Council and in consultation with Oxfordshire County Council.</p> <p>The Development Brief shall include:</p> <p><u>(a) A scheme and outline layout for delivery of the required land uses and associated infrastructure</u></p> <p><u>(b) Points of vehicular access and egress from and to existing highways</u></p> <p><u>(c) An outline scheme for public vehicular, cycle, pedestrian and wheelchair connectivity within the site, to the built environment, and to existing or new points of connection off-site and to existing or potential public transport services.</u></p> <p><u>(d) Protection and connection of existing public rights of way</u></p> <p><u>(e) incorporate d</u>Design principles that respond to the landscape, <u>canal-side and</u> Green Belt setting and the historic context of Oxford</p> <p><u>(f) Outline measures for</u></p>	<p>C-0766 from BBOWT Representation PR-C-0808 from Canal & River Trust</p> <p>OCC Rep PR-C-0832 Representation (PR-C-1402) from the Environment Agency and subsequent discussion</p>	<p>contribute to the positive effects recorded against SA objective 7 (Conserving and Enhancing Biodiversity) and would remove the uncertainty associated with this, as points 1(f), 2 and 3 outline how development of a golf course would be required to maintain and enhance biodiversity.</p> <p>The negative score against SA objective 9 would be removed, as points 4, 5 and 6 will contribute to ensuring that adverse effects on the historic environment are avoided, minimised and/or mitigated. However, the uncertainty will remain as effects on the setting of this feature depend on the detailed design, landscaping and layout of the site.</p> <p>Point 8 would further contribute to the positive effect recorded against SA objective 12 (Flood Risk). However, there would be no change in the significance of this effect.</p> <p>Whilst it is acknowledged that point 9 may help to mitigate/compensate for loss of agricultural land, there would be no change to the effects recorded against SA objective 13 (Efficient Use of Land). In addition, the landscaping scheme required by point 9 would further contribute to the minor positive effect identified against SA objective 8. Like the</p>

Ref. No. ²	Part 1 Review Policy	Reference	Proposed Change	Reason	SA Effect
			<p><u>securing net biodiversity gains informed by a Biodiversity Impact Assessment in accordance with (2) below</u></p> <p><u>(g) An outline scheme for vehicular access by the emergency services</u></p> <p><u>2. The application(s) shall be supported by the Biodiversity Impact Assessment (BIA) based on the DEFRA biodiversity metric (unless the Council has adopted a local, alternative methodology), to be agreed with Cherwell District Council</u></p> <p><u>3. The application(s) shall be supported by a proposed Biodiversity Improvement and Management Plan (BIMP) informed by the findings of the BIA and habitat surveys and to be agreed before development commences. The BIMP shall include:</u></p> <p><u>(a) measures for securing net biodiversity gain within the site and for the protection of wildlife during construction</u></p> <p><u>(b) measures for retaining and conserving protected/notable species (identified within baseline surveys) within the development</u></p> <p><u>(c) demonstration that designated environmental assets will not be harmed.</u></p>		<p>required development brief, it is expected to contribute to ensuring appropriate landscaping for this site. However, this remains uncertain until the details of the landscaping and land modelling are known, therefore there would be no change in the SA score recorded.</p> <p>The other additional text in this policy would have no effect in terms of SA.</p>

Ref. No. ²	Part 1 Review Policy	Reference	Proposed Change	Reason	SA Effect
			<p><u>including no detrimental impacts through hydrological, hydro chemical or sedimentation impacts</u></p> <p><u>(d) measures for the protection and enhancement of existing wildlife corridors and the protection of existing hedgerows and trees</u></p> <p><u>(e) the creation of a green infrastructure network with connected wildlife corridors</u></p> <p><u>(f) measures to minimise light spillage and noise levels on habitats especially along wildlife corridors</u></p> <p><u>(g) a scheme for the provision for bird and bat boxes and for the viable provision of designated green walls and roofs</u></p> <p><u>(h) farmland bird compensation</u></p> <p><u>(i) proposals for long-term wildlife management and maintenance</u></p> <p><u>4. Measures for the retention of the Grade II listed Frieze Farmhouse and an appropriate sensitive setting</u></p> <p><u>5. The application shall be supported by a Heritage Impact Assessment which will identify measures to avoid or minimise conflict with identified heritage assets within and adjacent to the site, particularly the Grade</u></p>		

Ref. No. ²	Part 1 Review Policy	Reference	Proposed Change	Reason	SA Effect
			<p><u>II Listed Frieze Farmhouse. These measures shall be incorporated or reflected, as appropriate, in any proposed development scheme'</u></p> <p><u>6. The application(s) shall be supported by a desk-based archaeological investigation which may then require predetermination evaluations and appropriate mitigation measures. The outcomes of the investigation and mitigation measures shall be incorporated or reflected, as appropriate, in any proposed development scheme</u></p> <p><u>7. The application(s) shall be supported by a Transport Assessment and Travel Plan including measures for maximising sustainable transport connectivity, minimising the impact of motor vehicles on existing communities and actions for updating the Travel Plan during the construction of the development</u></p> <p><u>8. The application will be supported by a Flood Risk Assessment, informed by a suitable ground investigation and having regard to guidance contained within the Council's Level 1 Strategic Flood Risk Assessment. The Flood Risk Assessment should include</u></p>		

Ref. No. ²	Part 1 Review Policy	Reference	Proposed Change	Reason	SA Effect
			<p><u>detailed modelling of watercourses taking into account allowance for climate change. There should be no ground raising or built development within the modelled flood zone.</u></p> <p><u>9. The application shall be supported by a landscaping scheme including details of materials for land modelling (to be agreed with the Environment Agency), together with a management plan for the appropriate re-use and improvement of soils.</u></p> <p><u>10. The application should demonstrate that Thames Water has agreed in principle that foul drainage from the site will be accepted into its network.</u></p> <p><u>11. A single comprehensive, outline scheme shall be approved for the entire site. The scheme shall be supported by draft Heads of Terms for developer contributions that are proposed to be secured by way of legal agreement. The application(s) shall be supported by a Delivery Plan demonstrating how the implementation and phasing of the development shall be</u></p>		

Ref. No. ²	Part 1 Review Policy	Reference	Proposed Change	Reason	SA Effect
			<u>secured comprehensively and how the provision of supporting infrastructure will be delivered. The Delivery Plan shall include a start date for development and a programme showing how and when the golf course would be constructed to meet any identified need as a result of the development of Land to the West of Oxford Road (Policy PR6b).</u>		
MM29	Policy PR6c – Policies Map	Policy PR6c- Policies Map	Remove constraint falling within Oxford City Council’s administrative boundary	In response to a request from Oxford City Council	No effect.
FC38	Policy PR7a	Point 1	Amend to read: ‘Construction of 230 dwellings (net) on 11 hectares of land (the residential area as shown). The dwellings to be constructed at an approximate average net density of 35 dwellings per hectare. ’	Plan improvement	No effect.
FC39	Policy PR7a	Point 12	Amend to: ‘ The application(s) shall be supported by a phase 1 habitat survey including habitat suitability index (HSI) survey for great crested newts, <u>and protected and notable species surveys as appropriate, including</u> great crested newt presence/absence surveys (dependent on HSI survey), surveys for badgers, breeding birds and reptiles, an internal building assessment for roosting barn owl, a tree survey	Representation PR-C-0766 from BBOWT	This change would further contribute to the positive effect identified (as part of a mixed effect) for SA objective 7 (Conserving and Enhancing Biodiversity) by adding more clarity that a range of protected and notable species surveys may be appropriate. However, there would be no changes in the significance of this effect.

Ref. No. ²	Part 1 Review Policy	Reference	Proposed Change	Reason	SA Effect
			and an assessment of water bodies.'		
FC40	Policy PR7a	Point 14	Amend to read 'The application should demonstrate that Thames Water, the Environment Agency and Natural England have been consulted regarding wastewater treatment capacity, and that Thames Water has agreed agreement has been reached in principle that foul drainage from the site will be accepted into the drainage its network.'	Representations from Natural England & recommendation from Water Cycle Study	No effect.
FC41	Policy PR7a	Point 16	Amend to read 'a desk-based archaeological investigation which may then require predetermination evaluations and appropriate mitigation measures. <u>The outcomes of the investigation and mitigation measures shall be incorporated or reflected, as appropriate, in any proposed development scheme</u> '.	Plan improvement / Representation PR-C-0305 from Historic England	This change would further contribute to the positive effect identified (as part of a mixed effect) against SA objective 9 (Protecting and Enhancing the Historic Environment), as it adds more certainty that appropriate mitigation would be implemented. However, there would be no changes in the significance of these effects.
FC42	Policy PR7a	New Point	Add new point 17 to read ' <u>The application shall include a management plan for the appropriate re-use and improvement of soils</u> '. Re-number subsequent points.	Plan Improvement / Representation from Daniel Scharf / SEA mitigation	Whilst it is acknowledged that this change may help to mitigate/compensate for loss of agricultural land, there would be no change to the effects recorded against SA objective 13 (Efficient Use of Land).
MM33	Policy PR7b – Policies Map	Land at Stratfield Farm	Indicate location of orchard referred to in Policy PR7b, point 6.	Presentational correction	No effect.

Ref. No. ²	Part 1 Review Policy	Reference	Proposed Change	Reason	SA Effect
FC43	Policy PR7b	Point 1	Amend to read: 'Construction of 100 homes (net) on 4 hectares of land (the residential area). The dwellings to be constructed at an approximate average net density of 25 dwellings per hectare. '	Plan improvement	No effect.
MM34	Policy PR7b	Point 7	Amend to read, 'Creation of a nature conservation area on 6.3 hectares of land as shown on the inset Policies Map, incorporating the community orchard and with the opportunity to connect to and extend Stratfield Brake proposed District Wildlife Site'.	Stratfield Brake District Wildlife Site has yet to be assessed against the list of criteria for District Wildlife Site designation by a site selection panel.	No effect on assessment, but it is acknowledged that Stratfield Brake District Wildlife Site is not currently designated and proposed only.
MM35	Policy PR7b	Point 8	Amend to read '...Land East of the A44 (PR9) (PR8) across the Oxford Canal,....'	Typo	No effect.
FC44	Policy PR7b	Point 9	Amend last sentence to read 'The Development Brief shall be prepared in consultation with Oxfordshire County Council, and Oxford City Council and the Canal and River Trust '.	Representation PR-C-0808 from the Canal and River Trust	No effect.
FC45	Policy PR7b	Point 13	Amend to read: ' The application(s) shall be supported by a phase 1 habitat survey including an habitat suitability index (HSI) survey for great crested newts, and protected and notable species surveys as appropriate, including great crested newt presence/absence surveys (dependent on HSI survey), hedgerow and tree survey, surveys for badgers, water vole, otter,	Representation PR-C-0766 from BBOWT	This change would further contribute to the positive effect identified (as part of a mixed effect) for SA objective 7 (Conserving and Enhancing Biodiversity) by adding more clarity that a range of protected and notable species surveys may be appropriate. However, there would be no changes in the significance of this effect.

Ref. No. ²	Part 1 Review Policy	Reference	Proposed Change	Reason	SA Effect
			invertebrate, dormouse, breeding birds and reptiles, an internal building assessment for roosting barn owl, and an assessment of water bodies'.		
FC46	Policy PR7b	Point 16	Amend to read 'The application should demonstrate that Thames Water, the Environment Agency and Natural England have been consulted regarding wastewater treatment capacity, and that Thames Water has agreed <u>agreement has been reached</u> in principle that foul drainage from the site will be accepted into <u>the drainage its</u> network.'	Representations from Natural England & recommendation from Water Cycle Study	No effect.
FC47	Policy PR7b	Point 17	Amend to read 'a Heritage Impact Assessment which will <u>identify</u> include measures to avoid or minimise conflict with identified heritage assets within <u>and adjacent to</u> the site, particularly Stratfield Farmhouse. <u>These measures shall be incorporated or reflected, as appropriate, in any proposed development scheme</u> .'	Plan improvement / Representation PR-C-0305 from Historic England	This change would further contribute to the positive effect identified (as part of a mixed effect) against SA objective 9 (Protecting and Enhancing the Historic Environment), as it adds more certainty that appropriate mitigation would be implemented. However, there would be no changes in the significance of these effects.
FC48	Policy PR7b	Point 18	Amend to read 'a desk-based archaeological investigation which may then require predetermination evaluations and appropriate mitigation measures. <u>The outcomes of the investigation and mitigation measures shall be incorporated or reflected, as appropriate, in any proposed development scheme</u> .'	Plan improvement / Representation PR-C-0305 from Historic England	This change would further contribute to the positive effect identified (as part of a mixed effect) against SA objective 9 (Protecting and Enhancing the Historic Environment), as it adds more certainty that appropriate mitigation would be implemented. However, there would be no changes in the

Ref. No. ²	Part 1 Review Policy	Reference	Proposed Change	Reason	SA Effect
					significance of these effects.
FC49	Policy PR7b	New Point	Add new point 19 to read ' <u>The application shall include a management plan for the appropriate re-use and improvement of soils</u> '. Re-number subsequent points.	Plan Improvement / Representation from Daniel Scharf / SEA mitigation	Whilst it is acknowledged that this change may help to mitigate/compensate for loss of agricultural land, there would be no change to the effects recorded against SA objective 13 (Efficient Use of Land).
MM36	Policy PR7b	Point 13	Amend to read '...phase 1 habitat survey including an a habitat suitability index...'	Typo	No effect.
MM37	Policy PR7b	Point 24	Amend to read: "...publicly accessible and well connected green infrastructure and which provides a transitional interface with Stratfield Brake Sports Ground and Stratfield Brake proposed District Wildlife Site and protects and enhances the Oxford Canal Conservation Area".	Stratfield Brake District Wildlife Site has yet to be assessed against the list of criteria for District Wildlife Site designation by a site selection panel.	No effect on assessment, but it is acknowledged that Stratfield Brake District Wildlife Site is not currently designated and proposed only.
MM38	Policy PR7b	Point 26	Amend to read: "The maintenance and enhancement of native landscaping to emphasise the Green Belt location of the land outside of the residential area and to provide for the potential accommodation of that land within the Stratfield Brake proposed District Wildlife Site.	Stratfield Brake District Wildlife Site has yet to be assessed against the list of criteria for District Wildlife Site designation by a site selection panel.	No effect on assessment, but it is acknowledged that Stratfield Brake District Wildlife Site is not currently designated and proposed only.
FC50	Policy PR8	Point 1	Amend to read: 'Construction of 1,950 dwellings (net) on approximately 66 hectares of land (the residential area as shown). The dwellings are to be	Plan improvement	No effect.

Ref. No. ²	Part 1 Review Policy	Reference	Proposed Change	Reason	SA Effect
			constructed at an approximate average net density of 45 dwellings per hectare'		
FC51	Policy PR8	Point 4	Amend to read 'The provision of a primary school with at least three forms of entry on 3.2 hectares of land in the location shown'.	Clarification Representation PR-C-0832 / discussions with OCC	No effect.
FC52	Policy PR8	Point 5	Amend to read 'The provision of a primary school with at least two forms of entry on 2.2 hectares of land in the location shown if required in consultation with the Education Authority and unless otherwise agreed with Cherwell District Council.'	Clarification Representation PR-C-0832 / discussions with OCC	No effect.
FC53	Policy PR8	Point 17	Amend last sentence to read 'The Development Brief shall be prepared in consultation with Oxfordshire County Council, and Oxford City Council, Network Rail and the Canal and River Trust '.	Representation PR-C-0808 from the Canal and River Trust	No effect.
FC54	Policy PR8	Point 18 b	Amend to read 'Points of vehicular access and egress from and to existing highways with at least two separate, connecting points from and to the A44 and including the use of the existing Science Park access road.'	Plan improvement Requested by OCC PR-C- 0832	No effect.
FC55	Policy PR8	Point 18(f)	Amend to read: 'In consultation with Oxfordshire County Council and Network Rail , proposals for the closure/unadoption of Sandy Lane, the closure of Sandy Lane to motor vehicles...'	Plan improvement further to representation (PR-C-0230) from Network Rail and subsequent discussions	No effect.
FC56	Policy PR8	Point 19	Amend to read, 'The application(s) shall be supported by the	Representation PR-C-0764 from Natural	This change would further

Ref. No. ²	Part 1 Review Policy	Reference	Proposed Change	Reason	SA Effect
			Biodiversity Impact Assessment (BIA) based on the DEFRA biodiversity metric (unless the Council has adopted a local, alternative methodology), prepared in consultation and agreed with Cherwell District Council. The BIA shall include <u>be informed by a hydrogeological risk assessment to determine whether there would be any material change in ground water levels as a result of the development and any associated adverse impact, particularly on Rushy Meadows SSSI, requiring mitigation. It shall also be informed by</u> investigation of any above- or <u>below</u> ground hydrological connectivity <u>with the SSSI and between</u> Rowel Brook- Rushy Meadows SSSI	England and related Rushy Meadows Hydrological and Hydrogeological Desk Study	contribute to the positive effect identified (as part of a mixed effect) against SA objective 7 (Conserving and Enhancing Biodiversity). However, neither the significance of this effect nor the overall score would change.
FC57	Policy PR8	Point 21	Amend to read: 'The application(s) shall be supported by a phase 1 habitat survey <u>and protected and notable species surveys as appropriate, including</u> and surveys for badgers, nesting birds, amphibians (in particular Great Crested Newts), reptiles and for bats including associated tree assessment, hedgerow regulations assessment.'	Representation PR-C-0766 from BBOWT	This change would further contribute to the positive effect identified (as part of a mixed effect) for SA objective 7 (Conserving and Enhancing Biodiversity) by adding more clarity that a range of protected and notable species surveys may be appropriate. However, there would be no changes in the significance of this effect.
FC58	Policy PR8	Point 22	Amend to read: 'The application(s) shall be supported by a Transport Assessment and Travel Plan	Plan improvement further to representation (PR-	No effect.

Ref. No. ²	Part 1 Review Policy	Reference	Proposed Change	Reason	SA Effect
			including measures for maximising sustainable transport connectivity, minimising the impact of motor vehicles on new residents and existing communities, and actions for updating the Travel Plan during construction of the development. <u>The Transport Assessment shall include consideration of the effect of vehicular and non-vehicular traffic on use of the railway level crossings at Sandy Lane, Yarnton Lane and Roundham.</u>	C-0230) from Network Rail and subsequent discussions	
FC59	Policy PR8	Point 23	Amend to read '23. The application shall be supported by a Flood Risk Assessment informed by a suitable ground investigation, and having regard to guidance contained within the Council's Level 2 Strategic Flood Risk Assessment. A surface water management framework shall be prepared to maintain run off rates to greenfield run off rates and volumes, with use of Sustainable Drainage Systems in accordance with adopted Policy ESD7, taking into account recommendations contained in the Council's Level 1 and Level 2 SFRAs. <u>Residential development must be located outside the modelled Flood Zone 2 and 3 envelope.</u>	Plan improvement further to representation (PR-C-1402) from the Environment Agency and subsequent discussion	No effect, as the SA acknowledges that the land within Flood Zones 2 and 3 has been set aside for a local nature reserve, informal publically accessible open space and land for agricultural use. As such, the SA already assumes that residential development will not occur within Flood Zones 2 and 3.
FC60	Policy PR8	Point 24	Amend to read 'The application should demonstrate <u>that Thames Water, the Environment Agency and Natural England have been consulted regarding</u>	Representations from Natural England & recommendation from Water Cycle Study	No effect.

Ref. No. ²	Part 1 Review Policy	Reference	Proposed Change	Reason	SA Effect
			<u>wastewater treatment capacity, and</u> that Thames Water has agreed <u>agreement has been reached</u> in principle that foul drainage from the site will be accepted into <u>the drainage its</u> network.'		
FC61	Policy PR8	Point 25	25. The application shall be supported by a Heritage Impact Assessment which will include <u>identify</u> measures to avoid or minimise conflict with the identified heritage assets within the site, particularly the Oxford Canal Conservation Area and the listed structures along its length. <u>These measures shall be incorporated or reflected, as appropriate, in any proposed development scheme.</u>	Rep PR-C-0305 from Historic England	This change would add more certainty that appropriate mitigation would be implemented, which is consistent with the minor negative effect identified against SA objective 9 (Protecting and Enhancing the Historic Environment). There would be no changes in the SA scoring or significance of this effect.
FC62	Policy PR8	Point 26	'...mitigation measures. <u>The outcomes of the investigation and mitigation measures shall be incorporated or reflected, as appropriate, in any proposed development scheme.</u> '	Rep PR-C-0305 from Historic England	This change would add more certainty that appropriate mitigation would be implemented, which is consistent with the minor negative effect identified against SA objective 9 (Protecting and Enhancing the Historic Environment). There would be no changes in the SA scoring or significance of this effect.
FC63	Policy PR8	New Point	Add new point 28 to read <u>'The application shall include a</u>	Plan Improvement / Representation from	Whilst it is acknowledged that this change may help to

Ref. No. ²	Part 1 Review Policy	Reference	Proposed Change	Reason	SA Effect
			<u>management plan for the appropriate re-use and improvement of soils'</u> Re-number subsequent points.	Daniel Scharf / SEA mitigation	mitigate/compensate for loss of agricultural land, there would be no change to the effects recorded against SA objective 13 (Efficient Use of Land).
FC64	Policy PR9	Point 1	Amend to read, 'Construction of 530440 dwellings (net) on approximately 16 hectares of land (the residential area as shown). The dwellings are to be constructed at an approximate average net density of 35 dwellings per hectare'	Plan Improvement informed by representation PR-C-1397 from Merton College	The decrease in number of dwellings to be provided would lessen the positive effect identified against SA objective 1 (Building Sustainable and Affordable Homes). However, due to the scale of the change, there would be no changes in the significance of this effect.
FC65	Policy PR9	Point 8 (b)	Amend to read: ' <u>At least two separate p</u> Points of vehicular access and egress to and from the A44 <u>with a connecting road between.</u>	Plan improvement Requested by OCC PR-C- 0832	No effect.
MM40	Policy PR9	Point 10 (d)	Amend to read: "(d) measures for the protection and enhancement of existing wildlife corridors, including along Frogwelldown Lane <u>proposed</u> District Wildlife Site and Dolton Lane, and the protection of existing hedgerows and trees".	Frogwelldown Lane District Wildlife Site has yet to be assessed against the list of criteria for District Wildlife Site designation by a site selection panel.	No effect on assessment, but it is acknowledged that Stratfield Brake District Wildlife Site is not currently designated and proposed only.
FC66	Policy PR9	Point 11	Amend to: "11. The application(s) shall be supported by a phase 1 habitat survey including habitat suitability index survey for great crested newts, <u>and protected and notable species surveys as appropriate, including</u> great crested newt presence/absence surveys (dependent on HSI	In response to BBOWT PR-C-0766	This change would further contribute to the positive effect identified (as part of a mixed effect) for SA objective 7 (Conserving and Enhancing Biodiversity) by adding more clarity that a range of protected and notable species surveys may be appropriate.

Ref. No. ²	Part 1 Review Policy	Reference	Proposed Change	Reason	SA Effect
			survey), for badgers, breeding birds, internal building assessment for roosting barn owl, dormouse, reptile, tree and building assessment for bats, bat activity, hedgerow regulations assessment and assessment of water courses".		However, there would be no changes in the significance of this effect.
FC67	Policy PR9	Point 14	Amend to read 'The application should demonstrate <u>that Thames Water and the Environment Agency have been consulted regarding wastewater treatment capacity, and that Thames Water has agreed agreement has been reached</u> in principle that foul drainage from the site will be accepted into <u>the drainage its</u> network.'	Representations from Natural England & recommendation from Water Cycle Study	No effect.
FC68	Policy PR9	Point 15	Amend to read, 'The application shall be supported by a Heritage Impact Assessment which will <u>include identify</u> measures to avoid or minimise conflict with the identified heritage assets within the site, <u>particularly the Oxford Canal Conservation Area and the listed structures along its length. These measures shall be incorporated or reflected, as appropriate, in any proposed development scheme.</u>	Rep PR-C-0305 from Historic England	This change would add more certainty that appropriate mitigation would be implemented, which is consistent with the minor negative effect identified against SA objective 9 (Protecting and Enhancing the Historic Environment). There would be no changes in the SA scoring or significance of this effect.
FC69	Policy PR9	Point 16	'...mitigation measures. <u>The outcomes of the investigation and mitigation measures shall be incorporated or reflected, as appropriate, in any proposed development scheme.</u>	Rep PR-C-0305 from Historic England	This change would add more certainty that appropriate mitigation would be implemented, which is consistent with the minor negative effect identified against SA

Ref. No. ²	Part 1 Review Policy	Reference	Proposed Change	Reason	SA Effect
					objective 9 (Protecting and Enhancing the Historic Environment). There would be no changes in the SA scoring or significance of this effect.
FC70	Policy PR9	New Point	<p>Add new point 17 to read '<u>The application shall include a management plan for the appropriate re-use and improvement of soils</u>'.</p> <p>Re-number subsequent points.</p>	Plan Improvement / Representation from Daniel Scharf / SEA mitigation	Whilst it is acknowledged that this change may help to mitigate/compensate for loss of agricultural land, there would be no change to the effects recorded against SA objective 13 (Efficient Use of Land).
FC72	PR10 Policies Map	Land South East of Woodstock	<p>Replace Policies Map (see Proposed Map Changes) reflecting changes to Policy PR10 showing:</p> <ul style="list-style-type: none"> - Reconfigured residential area - Archaeological Constraint Area - Removal of reference to retained agricultural land - Amendment to reflect primary school or outdoor sports use of land north of Shipton Road - Slightly adjust the position of the Nature Conservation Area and Community Woodland - Show Proposed Development within the West Oxfordshire District Council's administrative boundary which borders the PR10 site (<i>note: paragraph 5.132 of the Plan refers</i>) 	Improvement / Updating of policy PR10	<p>The implications of the change to potential uses of the land north of Shipton road are discussed in relation to changes to PR10 below.</p> <p>There would be no changes with regards to the assessments of other SA objectives.</p> <p>A Historic Impact Assessment agreed with Historic England has been used to redefine the Archaeological Constraint Area outside the development area, which would further contribute to the positive effect identified (as part of a mixed effect) against SA objective 9 (Protecting and Enhancing the Historic Environment).</p>

Ref. No. ²	Part 1 Review Policy	Reference	Proposed Change	Reason	SA Effect
			<p><u>Key changes:</u></p> <ul style="list-style-type: none"> - Amend to read: <u>'Primary School Use Safeguarded Area for Primary School Use or Outdoor Sports Provision'</u> - Add <u>'West Oxfordshire District Council Proposed Development'</u> 		
FC73	PR10	Point 1	<p>Amend to read 'Construction of 410500 dwellings (net) on 16.3 hectares of land (the residential area as shown). The dwellings to be constructed at an approximate average net density of 30 dwellings per hectare.</p>	<p>Plan improvement and reconfiguration of residential area to respond to archaeological issues.</p> <p>Plan Improvement</p>	<p>The increase in number of dwellings to be provided would further contribute to the positive effect identified against SA objective 1 (Building Sustainable and Affordable Homes). However, there would be no changes in the significance of this effect.</p>
FC74	PR10	Point 3	<p>Delete and replace as follows:</p> <p>'3.1 hectares of land and financial contributions for a new primary school with at least 2.2 forms of entry. The school buildings should be provided on site unless provision is made elsewhere and required education/sports facilities are instead provided in agreement between the Council, West Oxfordshire District Council and Oxfordshire County Council.'</p> <p><u>'Financial contributions for primary education and the safeguarding of 3.1 hectares of land north of Shipton Road for</u></p>	<p>Updating / Clarification from Oxfordshire County Council</p> <p>Representation PR-C-0305 from Historic England and associated discussion</p>	<p>Whilst this change introduces flexibility regarding the use of land north of Shipton Road, the policy still requires financial contributions for primary education and still requires the provision of formal sports facilities. As such, the overall effects recorded against SA objective 17 (Creating Economic Growth) and SA objective 2 (Improving Health and Well Being) would not change.</p> <p>The requirement to consider the Historic Impact Assessment agreed with Historic England would further contribute to the positive effect identified (as part of a mixed effect)</p>

Ref. No. ²	Part 1 Review Policy	Reference	Proposed Change	Reason	SA Effect
			<u>the potential development of a new primary school (2 forms of entry), or sports pitches, serving the wider community. Development of that land shall not take place until agreed with Historic England following consideration of a Heritage Impact Assessment'</u>		against SA objective 9 (Protecting and Enhancing the Historic Environment).
FC75	Policy PR10	Point 5	Amend to read 'The provision of formal sports facilities, play areas and allotments to adopted standards. within the developable area'	Plan Improvement	No effect.
FC76	Policy PR10	Point 6	Amend to read 'Creation of <u>green space including</u> a community woodland. and the retention of land in agricultural use'	Plan Improvement Representation PR-C-0305 from Historic England	This change would further contribute to the positive effects recorded against SA objectives 2 (health) and 7 (biodiversity). However, there would be no changes in the significance of this effect. The deletion of references to the retention of land in agricultural use would not lead to changes in the assessment of SA objective 13 (Efficient Use of Land) as there would still be a net loss of agricultural land. The removal of this text is a precautionary approach aimed at protecting the integrity of potential archaeological deposits on site. Consequently this has the potential to further contribute to the positive effect identified (as part of a mixed effect) against SA objective 9

Ref. No. ²	Part 1 Review Policy	Reference	Proposed Change	Reason	SA Effect
					(Protecting and Enhancing the Historic Environment).
FC77	Policy PR10	Point 10 a	Amend to read, 'A scheme and outline layout for delivery of the required land uses and associated infrastructure which unambiguously responds to, <u>and conserves or enhances, the significance of the</u> internationally and nationally significant heritage of the Blenheim Palace World Heritage Site, the Grade 1 Registered Park and Garden and the Blenheim Villa Scheduled Ancient Monument, their settings and influences on the historic, built and natural environments'.	Plan Improvement Representation PR-C-0305 from Historic England	This change further contributes to the positive effect identified (as part of a mixed effect) with regards to SA objective 9 (Protecting and Enhancing the Historic Environment). However, there would be no changes in the significance of this effect.
FC78	Policy PR10	Point 10 b	'Amend to read: <u>At least two separate</u> points of vehicular access and egress from and to existing highways.'	Updating Requested by OCC PR-C- 0832	No effect.
FC79	Policy PR10	Point 13	Amend to read: "The application(s) shall be supported by a phase 1 habitat survey including habitat suitability index (HSI) survey for great crested newts, <u>and protected and notable species surveys as appropriate, including</u> great crested newt presence/absence surveys (dependent on HSI survey), hedgerow and tree survey, surveys for badgers, breeding birds and reptiles".	In response to BBOWT PR-C-0766	This change would further contribute to the positive effect identified (as part of a mixed effect) for SA objective 7 (Conserving and Enhancing Biodiversity) by adding more clarity that a range of protected and notable species surveys may be appropriate. However, there would be no changes in the significance of this effect.
FC80	Policy PR10	Point 14	Amend to read: 'The green infrastructure, woodland and	Plan Improvement	This change would further

Ref. No. ²	Part 1 Review Policy	Reference	Proposed Change	Reason	SA Effect
			<p>agricultural land green space outside of the developable area to be kept free from other uses development unless otherwise agreed through the Development Brief. and The application for planning permission shall include proposals for securing the green infrastructure, woodland and green space these uses in perpetuity.</p>	Representation PR-C-0305 from Historic England	<p>contribute to the positive effects recorded against SA objectives 2 (health) and 7 (biodiversity). However, there would be no changes in the significance of this effect.</p> <p>The deletion of references to the retention of land in agricultural use would not lead to changes in the assessment of SA objective 13 (Efficient Use of Land) as there would still be a net loss of agricultural land.</p> <p>A Historic Impact Assessment agreed with Historic England has been used to redefine the Archaeological Constraint Area outside the development area, which would further contribute to the positive effect identified (as part of a mixed effect) against SA objective 9 (Protecting and Enhancing the Historic Environment).</p>
FC81	Policy PR10	Point 17	Amend to read 'a Heritage Impact Assessment which will identify include measures to avoid or minimise conflict with identified heritage assets within and adjacent to the site. <u>These measures shall be incorporated or reflected, as appropriate, in any proposed development scheme</u> '.	Plan improvement / Representation PR-C-0305 from Historic England	This change would further contribute to the positive effect identified (as part of a mixed effect) against SA objective 9 (Protecting and Enhancing the Historic Environment), as it would add more certainty that appropriate mitigation would be implemented. However, there would be no changes in the SA scoring or significance of this

Ref. No. ²	Part 1 Review Policy	Reference	Proposed Change	Reason	SA Effect
					effect.
FC82	Policy PR10	Point 18	Amend to read 'a desk-based archaeological investigation which may then require predetermination evaluations and appropriate mitigation measures in particular around the Scheduled Ancient Monument. <u>The outcomes of the investigation and mitigation measures shall be incorporated or reflected, as appropriate, in any proposed development scheme</u> '.	Plan improvement / Representation PR-C-0305 from Historic England	This change would further contribute to the positive effect identified (as part of a mixed effect) against SA objective 9 (Protecting and Enhancing the Historic Environment), as it would add more certainty that appropriate mitigation would be implemented. However, there would be no changes in the SA scoring or significance of this effect.
FC83	Policy PR10	New Point	Add new point 18 to read ' <u>The application shall include a management plan for the appropriate re-use and improvement of soils.</u> ' Re-number subsequent points.	Plan Improvement / Representation from Daniel Scharf / SEA mitigation	Whilst it is acknowledged that this change may help to mitigate/compensate for loss of agricultural land, there would be no change to the effects recorded against SA objective 13 (Efficient Use of Land).
FC84	Policy PR10	Point 24	Amend to read, 'Development that causes no harm to <u>the significance of</u> Blenheim Palace World Heritage Site and the Grade 1 Registered Park and Garden and their settings'.	Plan improvement / Representation PR-C-0305 from Historic England	This change would further contribute to the positive effect identified (as part of a mixed effect) against SA objective 9 (Protecting and Enhancing the Historic Environment). However, there would be no changes in the SA scoring or significance of this effect.
FC86	Policy PR11	Point 1(a)	Amend to read 'provide <u>and maintain</u> physical, community and green infrastructure'.	Representation PR-C-0348 from Scottish and Southern Electric Networks	No effect.

Ref. No. ²	Part 1 Review Policy	Reference	Proposed Change	Reason	SA Effect
				PR-C-1441 from Thames Water	
MM43	Policy PR11 – Infrastructure Delivery	Point 2	Amend to read: 'Completing and keeping up-to-date a Development Contributions Supplementary Planning Document...'	Typo	No effect
FC87	Policy PR11 – Infrastructure Delivery	Point 3	Amend to read ' Ensure that Development proposals will be required to demonstrate that infrastructure requirements can be met including the provision of transport, education, health, social, sport , leisure and community facilities, wastewater treatment and sewerage, and with necessary developer contributions in accordance with adopted requirements including those of the Council's Developer Contributions SPD.	Grammatical correction / Sport England representation PR-C-1403 / Thames Valley Police Representation PR-C-0302	This change will further contribute to the positive effects identified in relation to SA objective 2 (Improving Health and Well Being). However, there would be no changes in the significance of this effect.
FC88	Policy PR12a - Delivering Sites and Maintaining Housing Supply	3 rd Paragraph	Amend to read 'Land South East of Kidlington (Policy PR7a – 230 homes) and Land South East of Woodstock (Policy PR10 – 410 500 homes) will only be permitted to commence development before...'	Plan improvement and reconfiguration of residential area to respond to archaeological issues.	No effect.
FC89	Policy PR12a	5 th Paragraph	Amend to read: 'Permission will only be granted for any of the allocated sites if it can be demonstrated at application stage that they will contribute in delivering a continuous five year housing land supply on a site specific basis (i.e. measured against the local plan housing	Clarification / Representation PR-C-0775 on behalf of Christ Church, Exeter & Merton Colleges & Oxford University / Representation PR-C-0842 on behalf of University of Oxford,	No effect.

Ref. No. ²	Part 1 Review Policy	Reference	Proposed Change	Reason	SA Effect
			trajectory allocation for the site). <u>This will be achieved via the Delivery Plans required for each strategic development site.</u>	Merton College and a private landowner	
FC90	Policy PR12b - Sites Not Allocated in the Partial Review	Point (3)	Amend as follows: 'the site has been identified in the Council's Housing and Economic Land Availability Assessment as a potentially Developable site'.	Clarification / Representation PR-C-842 on behalf of University of Oxford, Merton College and a private landowner	No effect.
FC91	Policy PR12b - Sites Not Allocated in the Partial Review	Point (5) (a)	Amend to read 'A comprehensive Development Brief <u>and place shaping principles for the entire site</u> to be agreed <u>in advance</u> by the Council in consultation with Oxfordshire County Council and Oxford City Council.	Clarification / Representation PR-C-842 on behalf of University of Oxford, Merton College and a private landowner	No effect.
FC92	Policy PR12b - Sites Not Allocated in the Partial Review	Point 5(h)	Amend to read 'a Heritage Impact Assessment which will <u>identify include</u> measures to avoid or minimise conflict with identified heritage assets within and adjacent to the site. <u>These measures shall be incorporated or reflected, as appropriate, in any proposed development scheme</u> '.	Plan improvement / Representation PR-C-0305 from Historic England	This change would further contribute to the positive effect identified against SA objective 9 (Protecting and Enhancing the Historic Environment), as it would add more certainty that appropriate mitigation would be implemented. However, there would be no changes in the SA scoring or significance of this effect.
FC93	Policy PR12b - Sites Not Allocated in the	Point 5(i)	Amend to read 'a desk-based archaeological investigation which	Plan improvement / Representation PR-C-	This change would further

Ref. No. ²	Part 1 Review Policy	Reference	Proposed Change	Reason	SA Effect
	Partial Review		may then require predetermination evaluations and appropriate mitigation measures. <u>The outcomes of the investigation and mitigation measures shall be incorporated or reflected, as appropriate, in any proposed development scheme</u> .	0305 from Historic England	contribute to the positive effect identified against SA objective 9 (Protecting and Enhancing the Historic Environment), as it would add more certainty that appropriate mitigation would be implemented. However, there would be no changes in the SA scoring or significance of this effect.
FC94	Policy PR12b – Sites Not Allocated in the Partial Review	New point	Add as new point (3) <u>'50% of the homes are provided as affordable housing as defined by the National Planning Policy Framework.'</u> Renumber Existing points 3 to 5 as 4 to 6.	Consistency / Representation PR-C-1521 from Alaric Rose	The addition of the national policy requirement for 50% of delivered homes to be affordable would further add to the positive effects identified against SA objective 1 (Building Sustainable and Affordable Homes). However, there would be no changes in the SA scoring or significance of this effect.
FC95	Policy PR13 – Monitoring and Securing Delivery	3 rd paragraph	Amend last sentence to read, 'This will include the implementation of Local Plans and County wide strategies such as the Local Transport Plan and the Oxfordshire Infrastructure Strategy <u>and associated monitoring</u> .'	Plan improvement	No effect.
MM45	Policy PR13 – Monitoring and Securing Delivery	Final para	Amend text to read: 'If monitoring indicates that the vision and objectives cannot be met, the Council will consider whether it wishes to ask the Secretary of State for <u>Housing</u> , Communities and Local Government to....'	Change to Secretary of State's title.	No effect.

In-combination effects of the proposed changes to the Local Plan Part 1 Partial Review Proposed Submission document

- 1.14 The proposed changes would have **minor positive** effects on SA objective 7 (Conserving and Enhancing Biodiversity) as many of the policies would emphasise the need for the protection of notable species, as appropriate.
- 1.15 The proposed changes would have **minor positive** effects on SA objective 9 (Protecting and Enhancing the Historic Environment), as many policies have been strengthened to require that any mitigation recommendations from Heritage Impact Assessments and archaeological investigations be included in the proposed development scheme. This will bring more certainty that appropriate mitigation and enhancement measures will be implemented.
- 1.16 The proposed changes would only lead to changes in the assessment scoring of Policy PR6c. Whilst many of the changes would contribute to existing scores, the likely effect or significance of effects would not change overall. As such, **the proposed changes would contribute positively to, but not change, the overall cumulative effects of the Local Plan Part 1 Partial Review as recorded in the June 2017 SA Report.**

Habitats Regulations Assessment

- 1.17 The June 2017 HRA of the Cherwell Local Plan 2011-2031 (Part 1): Partial Review - Oxford's Unmet Housing Needs Proposed Submission Plan concluded that there would be 'no likely significant effects' on any Natura 2000 Sites as a result of the proposals within the Plan.
- 1.18 The Council has produced an HRA Addendum which considers the focused changes and minor modifications proposed to the Partial review to assess whether the findings of the HRA are still pertinent. Following a review of the February 2018 amendments to the Plan, it is concluded that the HRA and its conclusions still apply.
- 1.19 Following its representation submitted in response to the Cherwell Local Plan 2011-2031 (Part 1): Partial Review - Oxford's Unmet Housing Need Proposed Submission Plan, Natural England has requested that consideration be given to the in combination outputs of Cherwell's HRA and Vale of White Horse District Council's HRA of its emerging Local Plan Part 2. Discussion between the two Councils and Natural England was ongoing at the time of writing this Addendum.

Appendix 1

Consultation representations on Part 1 Partial Review Proposed Submission SA Report

Table A1: Representations on Part 1 Partial review Proposed Submission SA Report (2017)

Consultee	Consultation comments – summarised where appropriate	Response/action taken to address consultation comment in this updated SA Report
<p>Gladman Developments Ltd.</p>	<p>States that the Cherwell Local Plan Partial Review should ensure that the results of the SA process clearly justify its policy choices. It should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected. Assessment of reasonable alternatives should be comparative and equal and decision making and scoring should be robust, justified and transparent.</p> <p>State that it is not necessary that allocations to meet the needs of Oxford City are located in close proximity to the city, as Cherwell is closely linked to Oxford in terms of transport connections and travel to work patterns – the whole of Oxfordshire HMA would be suitable.</p> <p>Suggest allocation of land south east of Woodstock is inappropriate, particularly when in-combination effects with West Oxfordshire Council's proposed allocations on the Blenheim Palace World Heritage Site are considered.</p> <p>Concerned that reliance on large, strategic sites may lead to delay in meeting Oxford's unmet need due to long lead-in times. Suggest allocation of a portfolio of larger and smaller sites over a wider geographic area would be more appropriate and would help reduce the amount of land to be removed from the Green Belt.</p>	<p>A strategic and proportionate approach has been taken to forming and assessing the Areas of Search in order to identify the most appropriate broad areas for accommodating a proportion of Oxford's unmet housing need. Evidence has been used to assess the suitability and sustainability of each Area of Search as a potential Growth Option.</p> <p>Site options for accommodating a proportion of Oxford's unmet housing need have been assessed within Areas of Search selected by the Council. This decision has been based on the SA of the Areas of Search and other objective evidence.</p> <p>SA objective 9 considers effects on the historic environment. Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 2 of the SA Report. These assumptions are based upon an agreed SA Framework that has been subject to consultation and is set out in Chapter 5 of the SA Report.</p> <p>The scores and judgements associated with the appraisal of site options against SA objective 9 (historic environment) reflect the findings of site-based 'Cultural Sensitivity Assessments' undertaken for each site as part of Cherwell District Council's Landscape Character Sensitivity and Capacity Assessment.</p>

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		<p>The assessment of effects the historic environment includes the potential for adverse effect and the enhancement of Cherwell’s cultural and heritage assets (e.g. World Heritage Sites, Scheduled Ancient Monuments, Listed Buildings, Historic Parks and Gardens and Conservation Areas) and the setting of historic Oxford.</p> <p>In-combination effects with West Oxfordshire’s emerging Local Plan are discussed in Chapter 10 (paragraph 10.370 onwards).</p> <p>This is a strategic plan. The plan-making process has considered strategic sites and the threshold for the consideration of strategic sites is consistent with the Local Plan Part 1. Part 2 of the Local Plan will identify smaller, non-strategic development sites.</p>
Church Commissioners for England	<p>Concerned that concentrating development at PR7, 8, 9 and 10, may exacerbate congestion and that sustainable transport being proposed will still be road-based (i.e. park and ride, bus and RTP) and therefore the SA overstates the sustainability benefits of these options.</p> <p>Suggests that the impact of congestion has not been adequately considered in terms of alternative options, particularly locating development on the rail network, e.g. at Islip, which would remove some traffic from the road entirely.</p> <p>States the Council has not considered all reasonable alternatives to the overarching spatial strategy and promote growth at Islip. Describes benefits of proposed development in terms of suitability for release from Green Belt and ability to provide new infrastructure.</p> <p>Concerned that development of sites late in the plan period and at a high rate of delivery is too ambitious and that delivery would be assisted by including development at other sustainable settlements, such as Islip.</p> <p>The representation also appended the representation that was submitted on behalf of the Church Commissioners for England in January 2017.</p>	<p>Congestion has been assessed via SA objective 10: to reduce air pollution (including greenhouse gas emissions) and road congestion. The Council has produced transport evidence which has directly informed the Plan making process.</p> <p>Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 2 of the SA Report. These assumptions are based upon an agreed SA Framework that has been subject to consultation and is set out in Chapter 5 of the SA Report.</p> <p>The way in which the Council identified reasonable alternative Areas of Search is explained in Chapter 7 of the SA report (para 7.12 onwards). The Council’s reasons for selecting Areas of Search A and B and not selecting other Areas are detailed in Chapter 7 of the SA Report (paragraph 7.69 onwards).</p>

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	Responses to this representation are included in Appendix Table A3.2.	
David Lock Associates on behalf of Gallagher Estates	Concerned that the strategy concentrates growth across a small number of strategic sites, all closely related geographically, as this could affect deliverability of homes.	<p>Site options for accommodating a proportion of Oxford's unmet housing need have been assessed within Areas of Search selected by the Council. This decision has been based on the SA of the Areas of Search and other objective evidence.</p> <p>This is a strategic plan. The plan-making process has considered strategic sites and the threshold for the consideration of strategic sites is consistent with the Local Plan Part 1. Part 2 of the Local Plan will identify smaller, non-strategic development sites.</p>
Berks, Bucks and Oxon Wildlife Trust	<p>Concerned that overall proposed quantum of development in Oxfordshire as a whole will impact on wildlife.</p> <p>States that they have not reviewed the SA or HRA in detail but assume they consider impacts on Port Meadow SAC and other designated sites downstream. They expect Natural England will provide more detailed comments on this.</p> <p>Find it difficult to judge whether the calculated unmet housing need for Oxford is appropriate but believe that if additional housing in Oxford is required it should be met close to Oxford if possible. Agree that areas A and B are probably best suited to address Cherwell's contribution on meeting Oxford's housing needs due to their proximity to Oxford.</p>	<p>Noted.</p> <p>The SA considers the impacts of proposals on biodiversity through objective 7 (to conserve and enhance and create resources for biodiversity).</p> <p>The SA has taken into account the conclusions of the HRA where relevant.</p>
RPS Group on behalf of Mr Richard Davies	<p>Raises concerns regarding the potential impact of 'Land South East of Woodstock' on a historic town and Blenheim Palace World Heritage Site, particularly in combination with housing proposed nearby in West Oxfordshire's emerging Local Plan (Policy EW1c).</p> <p>Also states that development at this site would be a disproportionate and inappropriate addition to the town and points out that this was the reasoning for refusing a previous application on this site (14/02063/OUT).</p> <p>Proposes Land at Number 40 and to the rear of 30-40 Woodstock Road</p>	<p>Effects on the historic environment have been considered via SA objective 9. Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 2 of the SA Report. These assumptions are based upon an agreed SA Framework that has been subject to consultation and is set out in Chapter 5 of the SA Report.</p> <p>The scores and judgements associated with the</p>

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	<p>East as a suitable alternative site.</p>	<p>appraisal of site options against SA objective 9 (historic environment) reflect the findings of site-based 'Cultural Sensitivity Assessments' undertaken for each site as part of Cherwell District Council's Landscape Character Sensitivity and Capacity Assessment.</p> <p>The assessment of effects the historic environment includes the potential for adverse effect and the enhancement of Cherwell's cultural and heritage assets (e.g. World Heritage Sites, Scheduled Ancient Monuments, Listed Buildings, Historic Parks and Gardens and Conservation Areas) and the setting of historic Oxford.</p> <p>In combination effects have been considered as part of the cumulative effects section in Chapter 10 of the SA. This has considered the cumulative effects of the Local Plan Part 1 review as a whole and the effects of the plan in combination with the adopted Local Plan Part 1. In-combination effects with West Oxfordshire's emerging Local Plan are discussed in Chapter 10 (paragraph 10.370 onwards).</p>
<p>Framptons on behalf of Lone Star Land Ltd.</p>	<p>Promotes site adjacent to area of land identified for housing within the Adopted Local Plan – Policy Villages 5.</p> <p>Raises concerns that the Green Belt has not been considered through the SA, outside of Table A1.1.</p> <p>Concerned that SA objectives do not include all the purposes of including land within the Green Belt and fail to address the significance of the fact the land is within the Green Belt. Disagree with the statement at page 14, which states that the purposes of Green Belt set out in the NPPF are not all relevant to sustainability appraisal.</p> <p>States that the consideration of all reasonable alternatives is not restricted to large scale tracts of land to deliver new housing at a substantial scale. States that alternative sites release would be consistent with the development strategy for Part 1 of the plan should be allocated in</p>	<p>A strategic Green Belt Study was been prepared jointly by Oxfordshire Growth Board, including Oxfordshire County Council and the constituent Districts.</p> <p>While Green Belt is a 'policy' designation. The appraisal of options has sought to address effects on the openness of the countryside and the wider landscape through the consideration of effects on the landscape (SA objective 8), address effects on the special character and setting of historic towns though the consideration of effects on the historic environment (SA objective 9) and consider the efficient use of land through the consideration of effects on SA objective 13..</p>

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	preference to release from the Green Belt.	<p>It is recognised that exceptional circumstances will need to be demonstrated (in compliance with the NPPF) in order to release any land from the Green Belt. The Council has produced a Green Belt Study which has informed the Plan making process.</p> <p>Site options for accommodating a proportion of Oxford's unmet housing need have been assessed within Areas of Search selected by the Council. This decision has been based on the SA of the Areas of Search and other objective evidence.</p> <p>This is a strategic plan. The plan-making process has considered strategic sites and the threshold for the consideration of strategic sites is consistent with the Local Plan Part 1. Part 2 of the Local Plan will identify smaller, non-strategic development sites.</p>
Land and Partners Ltd.	States that the sustainability of the release of 111.8ha Green Belt land (Policy PR8) relies on a new railway station between Kidlington and Begbroke. States that it would be better to disperse growth around existing settlements unless the new railway station can be shown to be deliverable.	<p>Access to public transport is considered with regards to both accessibility (SA objective 6) and air pollution (SA Objective 10). This includes an assessment of the policy as a whole, which sets out that land should be set aside for the future railway halt/station, but would not directly result in a new, operational station. Therefore the SA is based on access to existing sustainable transport links and the conclusions are not dependent on a new station being provided. The Council's reasons for selecting Areas of Search A and B and not selecting other Areas are detailed in Chapter 7 of the SA Report (paragraph 7.69 onwards).</p>
Framptons on Behalf of EP Barrus	Promotes site adjacent to area of land identified for housing within the Adopted Local Plan – Policy Villages 5. Comments are the same as on behalf of Lone Star Land Ltd. (Promoted site is adjacent to Lone Star's site).	See response to Framptons representations on behalf of Lone Start Land Ltd. above.
Carter Jonas LLP	Supports SA in stating that the site is close to sustainable transport routes	Noted.

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<p>on behalf of W Lucy & Co Limited (promoting Land South of Sandy Lane, Site 34)</p>	<p>with good accessibility to employment.</p> <p>Disagrees with Council's reasons for rejecting the site given in paragraph 10.128 of the SA, regarding damage to the integrity of the Green Belt between the railway and Kidlington. Notes that land to the east of the 'subject land' is earmarked as parkland/retained agricultural land, which would maintain separation between Kidlington and the Urban Neighbourhood.</p> <p>States that the site should be allocated as an extension to Policy PR8 and because it does not fulfil any of the purposes of the Green Belt and is surrounded on three sides by the Policy PR8 allocation.</p>	<p>Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 2 of the SA Report. These assumptions are based upon an agreed SA Framework that has been subject to consultation and is set out in Chapter 5 of the SA Report.</p>
<p>WYG on behalf of Barwood Development Securities Ltd. (and interests at South East Kidlington, PR7a – promotes an extension to this site)</p>	<p>Objects to this policy in that the boundary amendment to the Green Belt is not the most sustainable option at South East Kidlington.</p> <p>States that the site at South East Kidlington is highly sustainable due to close geographical and functional relationship with Oxford and transport links.</p> <p>Highlights that SA concluded a combination of Option A (Kidlington and Surrounding Area) and Option B (North and East Kidlington) performed best in sustainability terms. In addition, the Transport Assessment identified that the most sustainable transport solution was one which located new residential development in close proximity to Oxford city. Also references the Landscape Statement, which deems the promoted site to be 'relatively unconstrained in landscape and visual terms'.</p>	<p>The way in which the Council identified reasonable alternative Areas of Search is explained in Chapter 7 of the SA report (para 7.12 onwards). The Council's reasons for selecting Areas of Search A and B and not selecting other Areas are detailed in Chapter 7 of the SA Report (paragraph 7.69 onwards).</p> <p>The Council has produced a Green Belt Study which has informed the Plan making process.</p>
<p>West Oxfordshire District Council</p>	<p>Concerned that the cumulative impact of the proposed Woodstock urban extension with proposals in the proposed West Oxfordshire Local Plan have not been considered. In particular, loss of openness may affect the setting of the Blenheim Palace World Heritage Site.</p> <p>Raises concerns regarding lack of parking in Woodstock and that development would create a satellite village, with high car use to commute to and from Kidlington.</p> <p>Concerned that development may have significant adverse effects on the</p>	<p>In combination effects have been considered as part of the cumulative effects section in Chapter 10 of the SA. This has considered the cumulative effects of the Local Plan Part 1 review as a whole and the effects of the plan in combination with the adopted Local Plan Part 1. In-combination effects with West Oxfordshire's emerging Local Plan are discussed in Chapter 10 (paragraph 10.370 onwards).</p>

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	<p>setting of Blenheim Villa Scheduled Monument.</p> <p>States that development would not relate well to the existing form of Woodstock as it would breach the natural boundary of a hedgerow feature on the western boundary, which follows the alignment of an historic track.</p>	<p>Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 2 of the SA Report. These assumptions are based upon an agreed SA Framework that has been subject to consultation and is set out in Chapter 5 of the SA Report.</p> <p>The scores and judgements associated with the appraisal of site options against SA objective 9 (historic environment) reflect the findings of site-based 'Cultural Sensitivity Assessments' undertaken for each site as part of Cherwell District Council's Landscape Character Sensitivity and Capacity Assessment.</p> <p>The assessment of effects the historic environment includes the potential for adverse effect and the enhancement of Cherwell's cultural and heritage assets (e.g. World Heritage Sites, Scheduled Ancient Monuments, Listed Buildings, Historic Parks and Gardens and Conservation Areas) and the setting of historic Oxford.</p> <p>Car use has been assessed in terms of air pollution and congestion, through SA objective 10. As this is dependent on behaviour, proximity to public transport links has been used as a proxy.</p> <p>The assessment of landscape impacts (SA objective 8), including how sites relate to existing development, the SA has drawn on the Landscape Character Sensitivity and Capacity Assessment (2017).</p>
David Lock Associates on behalf of 'Tripartite' (University of Oxford, Merton	Supports Council's spatial strategy for North Oxford, Kidlington and the A44 Corridor and overall approach of plan. Supports Council's conclusions that there are exceptional circumstances for removal of sites from the Green Belt.	<p>Noted.</p> <p>Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 2 of the SA Report. These assumptions are</p>

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College and a private landowner)	<p>Sustainability Appraisal of PR8</p> <p>Disagree with significant negative effect identified in relation to SA objective 13, as Yarnton Nurseries Garden & Shopping Village represents approximately 5 ha developed land. Also includes Begbroke Science Park, which consists of around 9.6 ha developed land.</p> <p>States that the site is well located with regards to the Begbroke Science Park, Oxford, Kidlington, Oxford Airport and potential new transport infrastructure, as well as having potential to provide a range of infrastructure.</p> <p>Suggests that use of the Natural England agricultural land classification is not proportionate, due to the age of the data and its broad scale. Refer to Natural England's Technical Guidance Note (TIN 049), which states these maps should not be relied upon for individual sites. Tripartite is undertaking an agricultural land assessment. Suggest that effects against SA objective 13 should be negligible or uncertain.</p> <p>Suggests minor negative effect recorded against SA objective 9 should be revised to negligible, due to Policy PR8's requirement for planning applications to be supported by a Heritage Impact Assessment and desk-based archaeological investigations.</p> <p>Suggests minor negative effect against SA objective 14 should be revised to minor positive as, whilst Policy PR does not make reference to the use of sustainably produced resources and energy, these are set out in Policy ESD3 and ESD5 of the adopted Cherwell Local Plan 2011-2031.</p>	<p>based upon an agreed SA Framework that has been subject to consultation and is set out in Chapter 5 of the SA Report.</p> <p>Whilst the site contains some previously developed land, the SA states that development 'would result in a net loss of greenfield land', as the site consists mainly of Grades 2 and 3 agricultural land.</p> <p>The PPG requires all sites to be assessed in the same way. It is considered appropriate to use the Natural England classification as this provides consistent data across the district. As SA is a strategic process, the Natural England classification is a useful tool for flagging-up potential issues, which can then be further investigated at the planning application stage if necessary.</p> <p>The requirement for planning applications to be supported by a Heritage Impact Assessment is noted in the PR8 assessment matrix. Scoring is consistent with the SA framework and assumptions.</p> <p>The assessment matrices do not consider policies of the adopted Cherwell Local Plan. Cumulative effects of the Local Plan Review as a whole and in combination with the adopted Local Plan are included in Chapter 10.</p>
Oxfordshire Green Party & North Oxfordshire Green Party	Suggests alternatives to reviewing the Green Belt have not been properly considered as proposals are justified by virtue of them not undermining the original local plan. Expresses concern that none of the original proposals in the local plan have been revisited.	<p>Noted.</p> <p>A strategic and proportionate approach has been taken to forming and assessing the Areas of Search in order to identify the most appropriate broad areas for accommodating a proportion of Oxford's unmet housing need. Evidence has been used to assess the suitability and sustainability of each Area of Search as</p>

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		<p>a potential Growth Option.</p> <p>Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 2 of the SA Report. These assumptions are based upon an agreed SA Framework that has been subject to consultation and is set out in Chapter 5 of the SA Report.</p>
<p>Nexus Planning on behalf of Hollins Strategic Land LLP</p>	<p>States that Cherwell is required to accommodate more than 4,400 dwellings through the Partial Review, as South Oxfordshire has not agreed to its apportionment of meeting Oxford’s unmet housing need.</p> <p>States that the whole of Cherwell has a close relationship with Oxford and providing the additional housing within the HMA is more important than focusing on sites close to Oxford city.</p> <p>States that reasonable alternatives have not been properly considered as each of the areas of search are so focussed that none individually represent realistic or reasonable alternatives. Suggests the combinations of areas of search should have been systematically assessed against SA objectives. Also suggests that the Council has over-simplified the ‘other options’ and therefore has not undertaken a meaningful assessment of these, particularly the inclusion of all of the ‘rural area’ in Area of Search I. States that such an approach ignores vast differences in sustainability of various rural settlements e.g. by assuming reliance on private car when settlements in close proximity to Banbury benefit from good public transport links to Oxford. Stresses that reducing dependence on private car can be achieved through proximity to sustainable transport links as well as proximity to Oxford.</p> <p>Argues that Council could progress alternatives that would minimise the need for Green Belt release, therefore there are not exceptional circumstances for Green Belt release.</p>	<p>Noted.</p> <p>A strategic and proportionate approach has been taken to forming and assessing the Areas of Search in order to identify the most appropriate broad areas for accommodating a proportion of Oxford’s unmet housing need.</p> <p>Chapter 7 of the SA report includes reasons for selecting the Areas of Search for more detailed site assessments. The Council’s reasons for not taking forward any of the other Area of Search options inherently mean that none of these options are considered to be appropriate individually and in combination with other Areas of Search. The way in which the Council identified reasonable alternative Areas of Search is explained in Chapter 7 of the SA report (para 7.12 onwards).</p> <p>Evidence has been used to assess the suitability and sustainability of each Area of Search as a potential Growth Option. The results of assessments for each Area of Search informed consideration of options that could be carried forward in combination. Areas A and B were taken forward.</p> <p>The appraisal of Area of Search I is proportionate for a</p>

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		<p>strategic scale assessment of potential growth options. Area of Search I is rural in nature, containing the remaining areas of the District not covered by the other Areas of Search A-H. The area has been appraised as a whole, and is shown to be remote from existing local and regional centres, with Area of Search I scoring 'Red' in ITP's assessment of 'proximity to current sustainable transport'. The Council has considered options which are within the rural area as separate options including 'new settlements' at Arncoth and at the Motorway junctions.</p> <p>This is a strategic plan. The plan-making process has considered strategic sites and the threshold for the consideration of strategic sites is consistent with the Local Plan Part 1. Part 2 of the Local Plan will identify smaller, non-strategic development sites.</p>
Carter Jonas LLP on behalf of Oxford Centre for Hebrew & Jewish Studies and Benesco (own Land adjacent to The Old School House, Church Lane, Yarnton)	States the SA should have considered development on at least part of client's land as well as proposed allocation in Policy PR9. In particular, the option to develop only the northern portion of the site, rather than the whole site, has not been considered.	<p>The way in which the Council identified reasonable alternative site options is explained in Chapter 9 (paragraph 9.4 onwards).</p> <p>Part 2 of the Local Plan will identify smaller, non-strategic development sites.</p>
Carter Jonas LLP on behalf of Mr M Smith and Mr G Smith (own part of PR6)	Supports delivery of homes in close proximity to Oxford and villages of Kidlington, Begbroke, Islip and Yarnton. States that development of land at PR8 is logical extension to the settlement and well located. Supports strategic allocation as it can provide infrastructure that is unviable on smaller sites.	Noted.
Turnberry on behalf of Exeter College	States that allocation of site PR6c for construction of a golf course is not justified and is an inefficient use of land. Suggests that the SA demonstrates development of site PR6c performs equally with sites PR6b and PR7a and better than sites PR9 and PR10 in terms of impacts on	<p>The site was assessed as a site option in Chapter 9 (appendix 6) like all relevant promoted sites.</p> <p>Paragraph 10.131 of the SA Report explains that the</p>

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	<p>Oxford City and equal to PR6a, PR9 and PR10 in terms of impacts on Cherwell District, despite being stated by Cherwell District Council as unsuitable for housing. Suggests that allocation of PR6c for housing should have been assessed as a reasonable alternative and raises concerns that the SA does not explain why this was not considered. Concerned that this means the SA does not provide a direct comparison compared to other allocations and does not permit a third party to understand the conclusions of the SA, nor the rationale behind them.</p> <p>Section 2 promotes a Development Plan for the Frieze Farm area, including land identified in PR6c.</p> <p>Raises concerns that key conclusions from the Oxford Spatial Options Assessment (OSOA) do not appear to have been included in the Sustainability Appraisal, which contradicts this Assessment in concluding remote sites have a greater potential to affect a modal shift towards more sustainable choices.</p> <p>States that the SA does not accurately represent the likely traffic and air quality implications of development as it is not based on justified and consistent evidence.</p>	<p>Council consider PR6c to be unsuitable for housing as <i>“residential development would be segregated from Oxford and separated from Kidlington and Yarnton. Development would breach the A34 and be perceived as a freestanding development and a new highly urbanising influence between Oxford and Cherwell. The relatively exposed and elevated nature of the site to the south would result in residential development being highly visible from the north”</i>.</p> <p>Impacts on traffic and air quality have been assessed via SA objective 10: to reduce air pollution (including greenhouse gas emissions) and road congestion.</p> <p>Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 2 of the SA Report. These assumptions are based upon an agreed SA Framework that has been subject to consultation and is set out in Chapter 5 of the SA Report.</p>
Highways England	<p>Highlights that if Green Belt development is not permitted it may need to be allocated elsewhere, which could have a greater impact on the highway network. However, delivery of an additional 4,400 more dwellings could have a significant impact on the strategic road network, therefore such impacts need to be accurately assessed.</p> <p>Notes that development sites away from urban centres may not benefit from some of the existing sustainable transport options available in urban areas – sufficient sustainable transport solutions need to be provided to/from development in these areas.</p> <p>Welcomes location of development in relatively close proximity to Oxford along key radial routes, due to potential for high quality sustainable transport connections. However, notes these need to be in place then traffic impacts on the A34/A44 Peartree Interchange would be ‘intolerable’. States that residual impacts of development are yet to be</p>	<p>Noted.</p> <p>Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 2 of the SA Report. These assumptions are based upon an agreed SA Framework that has been subject to consultation and is set out in Chapter 5 of the SA Report.</p> <p>Impacts on traffic and air quality have been assessed via SA objective 10: to reduce air pollution (including greenhouse gas emissions) and road congestion. SA objectives 6 (accessibility) and 16 (access to employment) are also relevant to transport. These draw on ITP’s Transport Assessment and proximity to</p>

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	<p>fully understood and therefore appropriate mitigation cannot yet be identified. Additional key areas that could be impacted by development include other links on the A34 and M40 Junction 9. State the impacts on these are unclear and should be assessed. States it should also be clarified whether developer funding is intended to fully cover infrastructure schemes. Also recommends an assessment of the cumulative impact on the strategic road network from all site proposals.</p>	<p>existing public transport links.</p> <p>The Council has produced transport evidence which has directly informed the Plan making process.</p>
<p>Bloombridge LLP</p>	<p>Proposes inclusion of The Moors, Kidlington.</p> <p>States that SA underplays the role played by strategic components of the Green Belt, particularly the Kidlington Gap and Begbroke Gap and the rural setting of Oxford as viewed from the A44. Expects an appraisal of the costs and benefits of development of these areas in social, economic and environmental terms, which should be consistent with the landscape character inputs to the draft plan. States that The Moors performs well, relative to PR6, PR8 and PR9 (and part of PR7a) in terms of its impact on the Green Belt. States it is not clear why The Moors was omitted from the plan.</p> <p>Suggest that SA objective 16 should be scored as minor positive, rather than mixed, as The Moors could accommodate some employment for SMAs as part of the development mix.</p> <p>Agrees with SA assessment for sustainable transport, landscape assessment (SA objective 8) and historic environment objective (SA objective 9).</p> <p>With regards to biodiversity, states The Moors had medium/low sensitivity, which proposed 10 ha of country park and green space can fully offset or mitigate.</p> <p>States 'there is no flood risk'.</p> <p>States the Grade 3 agricultural land has deteriorated.</p>	<p>Noted.</p> <p>Green Belt is a policy designation. However, as highlighted in the assumptions for SA objective 8 (landscape), limiting urban sprawl, coalescence of settlements and encroachment of the countryside are relevant to this objective. The assessment of SA objective 8 draws on potential to affect the AONB and the Landscape Character Sensitivity and Capacity Assessment. The Council has produced a Green Belt Study which has informed the Plan making process.</p> <p>Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 2 of the SA Report. These assumptions are based upon an agreed SA Framework that has been subject to consultation and is set out in Chapter 5 of the SA Report.</p> <p>This site has been identified by the Council as a potential site for residential development. Potential inclusion of other uses or mitigation is not provided in detail for all sites at this stage, therefore the options have only been assessed for what the Council has identified as their potential use.</p> <p>The assessment against SA objective 12 in the site assessment matrix recognises that the site lies outside</p>

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		<p>of flood zone 3, but that development would occur of greenfield land partially within flood zone 2 and susceptible to surface water, groundwater and sewer flooding incidents, as identified in the Level 1 SFRA Update.</p> <p>In order to ensure consistency across site assessments, national datasets have been used to identify agricultural land classification of land within site options.</p>
Pegasus Group on behalf of Richborough Estates	<p>Suggests that Cherwell may be required to provide additional housing due to South Oxfordshire Council only agreeing to meet part of their apportionment of Oxford's unmet need, leaving a shortfall of 1,200 dwellings.</p> <p>Suggests that Council have not considered all reasonable alternatives, as only sites within Areas of Search A and B were subject to SA.</p>	<p>Noted.</p> <p>A strategic and proportionate approach has been taken to forming and assessing the Areas of Search in order to identify the most appropriate broad areas for accommodating a proportion of Oxford's unmet housing need.</p> <p>Site options for accommodating a proportion of Oxford's unmet housing need have been assessed within Areas of Search selected by the Council. This decision has been based on the SA of the Areas of Search and other objective evidence.</p>
Bloor Homes	<p>Suggests that the level of Oxford's unmet need to be accommodated should be a minimum of 4,400. Suggests this needs to be reflected in SA Chapter 8: Appraisal of Quantum of Additional Development Findings.</p> <p>The Local Plan Partial Review is not legally or procedurally compliant as a result of the approach undertaken to identifying first, broad Areas of Search Options and secondly, specific sites within those options that were taken forward (Options A and B).</p> <p>Promotes further allocations within Area of Search H. Suggests site PR45 would provide a logical extension to Banbury 3: West of Bretch Hill. Outlines the features and advantages of this site. Notes that the SA of this site had largely positive results.</p>	<p>Noted.</p> <p>A strategic and proportionate approach has been taken to forming and assessing the Areas of Search in order to identify the most appropriate broad areas for accommodating a proportion of Oxford's unmet housing need.</p> <p>Site options for accommodating a proportion of Oxford's unmet housing need have been assessed within Areas of Search selected by the Council. This decision has been based on the SA of the Areas of</p>

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		Search and other objective evidence.
Gerald Eve LLP on behalf of Merton College	Supports village extension to Yarnton. Welcomes SA findings of significant positive effects with regards to health and wellbeing and access to services and facilities.	Noted.
Edgars Limited on behalf of Mr & Mrs Tomes	<p>Support vision, objectives and general approach to meeting Oxford's unmet needs.</p> <p>Objects and states that 4,400 homes should be a minimum figure.</p> <p>Support removal of land at 14-16 Woodstock Road from Green Belt in PR3. Object to safeguarding of this land and state it should be allocated within proposals for a new sustainable urban neighbourhood under PR8.</p> <p>Highlight 'strategic advantages' of this site, including proximity to A44 corridor and potential for sustainable transport, lack of contribution to the Green Belt and opportunity to integrate with Begbroke Science Park proposals.</p> <p>States that the site has not been submitted for consideration previously, therefore it has not been explicitly assessed as a development opportunity as part of the Council's evidence base, including the SA, but has been appraised under Policy PR3. Notes that this policy is assessed as having mainly positive effects. Considers that potential significant adverse effects on the historic environment can be avoided.</p>	<p>Noted.</p> <p>The Council has produced a Green Belt Study which has informed the Plan making process.</p> <p>Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 2 of the SA Report. These assumptions are based upon an agreed SA Framework that has been subject to consultation and is set out in Chapter 5 of the SA Report.</p> <p>The Council's reasons for selecting Areas of Search A and B (and for not selecting other options) are detailed in Chapter 7 and the Council's reasons for selecting preferred site allocations (and not selecting others) are detailed in Chapter 10.</p>
Oxfordshire County Council	<p>Supports document and its alignment with the Oxford Transport Strategy.</p> <p>States that whilst proposed sites score highly in terms of sustainability, it should be recognised that there are high levels of traffic congestion in the southern Cherwell/North Oxford area; this is an existing issue which extends into neighbouring districts and which will worsen with the impact of the cumulative growth across the region. Any of Oxford's unmet housing needs located within Cherwell would have some impact on this area in order to access the city. The sites proposed by CDC score highly in terms of sustainability due to the opportunities for public transport, cycling and walking connectivity with the city, and would therefore have a lesser impact in transport terms.</p>	<p>Noted.</p> <p>The SA baseline information acknowledges that there are existing traffic congestion issues in the area. As explained in the assumptions in Appendix 2, ITP's Transport Assessment was used to inform judgements regarding the effects of options on traffic. The Council has produced transport evidence which has directly informed the Plan making process.</p>

Consultee	Consultation comments – summarised where appropriate	Response/action taken to address consultation comment in this updated SA Report
<p>WYG on behalf of Bonnar Allen Ltd.</p>	<p>Disagrees with approach of focusing growth around Kidlington as other locations may offer better transport links. Also states that preferred locations around Kidlington will increase congestion on the highway network and result in loss of Green Belt land and lead to coalescence between Kidlington, Begbroke and Yarnton.</p> <p>Proposes that the majority of unmet need should be directed to New Alchester.</p>	<p>The Council has produced transport evidence which has directly informed the Plan making process.</p> <p>A strategic and proportionate approach has been taken to forming and assessing the Areas of Search in order to identify the most appropriate broad areas for accommodating a proportion of Oxford’s unmet housing need.</p> <p>Site options for accommodating a proportion of Oxford’s unmet housing need have been assessed within Areas of Search selected by the Council. This decision has been based on the SA of the Areas of Search and other objective evidence.</p> <p>The Council’s reasons for selecting Areas of Search A and B (and for not selecting other options) are detailed in Chapter 7 and the Council’s reasons for selecting preferred site allocations (and not selecting others) are detailed in Chapter 10.</p>
<p>Carter Jonas LLP on behalf of Sheehan Group of Companies</p>	<p>States that the promoted site would be a logical extension to the Begbroke Urban neighbourhood or the existing built up area of Yarnton. Also states that the site is not within a conservation area, nor does it contain any existing buildings, is not subject to any landscape or environmental policy designations and does not fulfil a Green Belt function.</p> <p>Seeks clarification regarding how site can be assessed as having both significant positive and significant negative effects with regards to reducing air pollution. Also notes that current use includes a number of lorry/HGV trips to and from the site, which would be reduced if use changed to residential. Also states that redevelopment would provide an opportunity for biodiversity enhancements.</p> <p>States that the Council has failed to fully consider all reasonable alternatives/additional options.</p>	<p>Noted.</p> <p>A strategic and proportionate approach has been taken to forming and assessing the Areas of Search in order to identify the most appropriate broad areas for accommodating a proportion of Oxford’s unmet housing need.</p> <p>Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 2 of the SA Report. These assumptions are based upon an agreed SA Framework that has been subject to consultation and is set out in Chapter 5 of the SA Report.</p> <p>As explained in the site appraisal matrix in Appendix 6</p>

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		<p>of the SA Report, this site was assessed as having significant positive effects on SA objective 10 as it is in close proximity to a premium bus route. Significant negative effects may occur as development may increase traffic within AQMAs in Oxford. As such, development at this site is expected to have a mix of both positive and negative significant effects.</p> <p>Site options for accommodating a proportion of Oxford's unmet housing need have been assessed within Areas of Search selected by the Council. This decision has been based on the SA of the Areas of Search and other objective evidence.</p> <p>The Council's reasons for selecting Areas of Search A and B (and for not selecting other options) are detailed in Chapter 7 and the Council's reasons for selecting preferred site allocations (and not selecting others) are detailed in Chapter 10.</p>
<p>Turley on behalf of Bovis Homes Ltd</p>	<p>Suggests breaking down summary of each area of search with regard to effects on the City of Oxford or Cherwell District is not a positive approach, because it is not an holistic approach. Advises that these are not separated.</p> <p>Considers the use of colour coding in SA matrices ineffective and contrary to the NPPF as there are no thresholds for each score for what level of effects would be considered significant.</p> <p>Suggests inaccurate methodology has led to inaccurate representation of areas of search and headline summaries do not reflect the true nature of the whole district.</p> <p>Suggests plan is contrary to NPPF in allocating sites that the WYG ecological study concluded would have cumulative adverse effects on Rushy Meadow SSSI.</p> <p>States that Option H is the most sustainable area for growth as it has the</p>	<p>As explained in paragraphs 5.5 and 5.6 of the SA Report, <i>"the principal driver for the Part 1 Partial Review is to accommodate some of Oxford's unmet housing need. Part 1 of Cherwell's Local Plan already makes provision for Cherwell's housing and employment needs over the Plan period. Therefore, SA objectives relating to the provision of housing and economic growth development have been appraised mainly for effects on the City of Oxford. However, it is recognised that economic effects will be wider and/or consequential... Furthermore, SA objectives considered to be of particular spatial relevance to Oxford as well as Cherwell have been appraised for effects in relation to both the City of Oxford and Cherwell District"</i>. The assessment of cumulative effects in Chapter 10 ensures that the SA includes a holistic assessment of</p>

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	<p>most significant positive effects on Cherwell and the least significant negative effects on Cherwell.</p> <p>Notes that the SA acknowledges the sustainable location of Banbury. Notes that the SA considers sustainable transport advantages of area of search H (as well as C and F) and that support with regards to Options A and B relates largely to their close proximity to Oxford. Suggests SA demonstrates that sustainable transport is not a reason for discounting Banbury, even though it is further away from Oxford as it is well connected via public transport. States that this has not been relayed appropriately due to unknown thresholds and segregation of effects between Oxford and Cherwell.</p>	<p>the plan as a whole.</p> <p>Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 2 of the SA Report. These assumptions are based upon an agreed SA Framework that has been subject to consultation and is set out in Chapter 5 of the SA Report.</p> <p>A strategic and proportionate approach has been taken to forming and assessing the Areas of Search in order to identify the most appropriate broad areas for accommodating a proportion of Oxford's unmet housing need. The driver for the Local Plan review is to meet the objective unmet need of Oxford; therefore the SA report focuses on this.</p> <p>The Council's reasons for selecting Areas of Search A and B (and for not selecting other options) are detailed in Chapter 7 and the Council's reasons for selecting preferred site allocations (and not selecting others) are detailed in Chapter 10.</p>
Lichfields on behalf of Taylor Wimpey (Oxfordshire)	<p>Relates to Land North and South of Milton Road, Bloxham (site 35).</p> <p>Does not consider that Oxford's housing need should be considered separately to the rest of the HMA.</p> <p>Concerned that the plan has informed the evidence, rather than the other way around, as only sites within Areas of Search A and B proceeded to site assessment, and that the Submission Plan states that it '<i>focuses development on a geographic area extending north from Oxford to South Kidlington</i>'.</p> <p>Summarises concerns raised with regards to the initial SA Report (November 2016).</p> <p>Does not consider that all reasonable alternative options have been fully addressed, at the appropriate time to enable an appraisal of these within</p>	<p>Noted.</p> <p>The SA has been carried out by independent consultants. Site options for accommodating a proportion of Oxford's unmet housing need have been assessed within Areas of Search selected by the Council. This decision has been based on the SA of the Areas of Search and other objective evidence.</p> <p>A strategic and proportionate approach has been taken to forming and assessing the Areas of Search in order to identify the most appropriate broad areas for accommodating a proportion of Oxford's unmet housing need.</p>

Consultee	Consultation comments – summarised where appropriate	Response/action taken to address consultation comment in this updated SA Report
	<p>the preparation of the emerging plan.</p> <p>Concerned that the plan is over-reliant on concentrating housing close to Oxford City, rather than considering sustainable development locations throughout the district.</p> <p>Proposes that sustainable locations within Area of Search I should be assessed and adequate reasoning provided as to why these should be preferred or rejected in favour of alternative means of meeting the housing need.</p> <p>Considers the conclusion that Option I would ‘include some significant negative effects for some objectives’ is unfounded when the relevant criteria will vary widely over such a large area. For the same reasons, the conclusion that this option is not considered suitable for accommodating housing to meet Oxford’s unmet housing needs is not considered reasonable.</p>	<p>Responses to comments raised in relation to the November 2016 report are included in Appendix 3 of the June 2017 SA Report.</p> <p>The way in which the Council identified reasonable alternative Areas of Search is explained in Chapter 7 of the SA report (para 7.12 onwards). The Council’s reasons for selecting Areas of Search A and B and not selecting other Areas are detailed in Chapter 7 of the SA Report (paragraph 7.69 onwards).</p> <p>The appraisal of Area of Search I is proportionate for a strategic scale assessment of potential growth options. Area of Search I is rural in nature, containing the remaining areas of the District not covered by the other Areas of Search A-H. The area has been appraised as a whole, and is shown to be remote from existing local and regional centres, with Area of Search I scoring ‘Red’ in ITP’s assessment of ‘proximity to current sustainable transport’.</p>
GVA on behalf of Oxford Aviation Services (own London Oxford Airport; LOA)	<p>Concerned that SA seems to assume that any development at the LOA will encompass the entire site as a whole and will involve closure of the airport. Suggests the SA should consider sub-divided parcels of the site individually. Concerned that current approach produces unrealistically negative results, which has led to the decision not to allocate the site.</p> <p>States that this is one of the most sustainable site options as it is suitable, achievable and deliverable, of low value in Green Belt and landscape terms, arguably the most accessible option in the preferred area of search and will realise significant and unique economic benefits.</p> <p>Representation also includes an updated planning/development proposition, proposed updates to the SA, an economic report and copies of previous representations.</p>	<p>It has not been assumed that development at site 118 would involve closure of the airport. The SA of the sites has been undertaken in a consistent and proportionate way. The Council’s reasons for decision making are given in Chapter 10 of the SA Report and include that “<i>residential development is unlikely to be conducive to good operation of the airport</i>” (paragraph 10.158) The Council has made its decisions informed by the SA but also informed by other evidence such as that relating to transport.</p> <p>As detailed in the site assessment matrix, this site scored poorly in ITP’s Transport Assessment in terms of access to Oxford jobs, but was deemed to have positive effects with regards to access to services and</p>

Consultee	Consultation comments – summarised where appropriate	Response/action taken to address consultation comment in this updated SA Report
		<p>facilities. Effects on landscape have been assessed via SA objective 8, which draws on the Landscape Character Sensitivity and Capacity Assessment. This concluded that the site has medium to low capacity for development due to the relative openness and visibility of the site.</p> <p>Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 2 of the SA Report. These assumptions are based upon an agreed SA Framework that has been subject to consultation and is set out in Chapter 5 of the SA Report. The SA cannot take into account additional design and mitigation measures proposed by developers, as they cannot be guaranteed and are not available on a like for like basis between sites. The proposed updates to the SA are not consistent with this methodology.</p>
<p>Barton Wilmore on behalf of A2Dominion Housing Group Limited</p>	<p>States the Local Plan Review should address the need to provide a balanced housing supply in locations which are both sustainable and meet the needs of Oxford City Council. There should be a single comprehensive approach to meeting Cherwell and Oxford City Councils' needs. States that the identification of reasonable alternatives should have commenced with a review of settlements with good socio-economic and transport links to Oxford City, the capacity of existing strategic allocations in these locations, and whether they can accommodate additional housing.</p> <p>Promotes growth at Bicester and claims this has not been rigorously tested.</p> <p>States that the Sustainability Appraisal (June 2017) only appraised for effects on Oxford City and not the impact on wider Cherwell District.</p>	<p>The way in which the Council identified reasonable alternative Areas of Search is explained in Chapter 7 of the SA report (para 7.12 onwards). The Council's reasons for selecting Areas of Search A and B and not selecting other Areas are detailed in Chapter 7 of the SA Report (paragraph 7.69 onwards).</p> <p>A strategic and proportionate approach has been taken to forming and assessing the Areas of Search in order to identify the most appropriate broad areas for accommodating a proportion of Oxford's unmet housing need.</p> <p>Site options for accommodating a proportion of Oxford's unmet housing need have been assessed within Areas of Search selected by the Council. This decision has been based on the SA of the Areas of</p>

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		<p>Search and other objective evidence.</p> <p>The SA considered effects on both Oxford City and the wider Cherwell District. As explained in Chapter 5 of the SA Report, the principal driver for the Part 1 Partial Review is to accommodate some of Oxford’s unmet housing need; therefore, SA objectives relating to the provision of housing and economic growth development have been appraised mainly for effects on the City of Oxford. However, it is recognised that economic effects will be wider and/or consequential. This applies only to SA objectives 1, 16 and 17. All other SA objectives have been assessed for their effects on Oxford and Cherwell or Cherwell only.</p>
<p>Richard Buxton Law on behalf of Begbroke & Yarnton Green Belt Campaign (BYG)</p>	<p>Raises concerns that Green Belt release is unjustified as exceptional circumstances do not exist. Particularly object to removal of land at PR8 and PR9, but also PR6a, PR6b, PR7a, PR7b and PR10.</p> <p>Para 2.39 of the SA - References the SA to support point that ‘the final apportionment [from the Growth Board] is a recommendation’, although the consultee claims this is confusing in its full context.</p> <p>Chapter 8 of the SA - States the appraisal of alternative apportionment figures in Chapter 8 of the SA is high level <i>‘to the point of being meaningless’</i>. Criticises lack of spatial implications of accommodating different apportionment figures.</p> <p>Paras 7.69 to 7.91 of the SA - States that relying on the total number of positive and negative SA scores as a metric for selecting areas of search is weak and overly simplistic. <i>‘SA scores should never be tallied, as there is no assumption that each of the SA criteria has equal weight’</i>.</p> <p>Suggests that consultation on the SA Report alongside a ‘true’ draft plan, under regulation 18, is necessary to meet requirements of the SEA Directive and Aarhus Convention. This relates to the requirement of the SEA Directive to carry out ‘early and effective’ draft plan consultation and the Aarhus Convention to provide for participation ‘when all options are open’. Also notes that Article 8 of the SEA Directive anticipates a stage of plan finalisation following consultation.</p>	<p>Noted.</p> <p>A strategic and proportionate approach has been taken to forming and assessing the Areas of Search in order to identify the most appropriate broad areas for accommodating a proportion of Oxford’s unmet housing need. All options were assessed consistently and in line with the approach outlined in Chapter 8 of the SA Report.</p> <p>Paragraphs 7.69 to 7.91 of the SA Report simply summarises the SA conclusions in these terms for brevity. It does not indicate that totalling up the number of positive and negative scores was the basis for decision making. Paragraph 7.69 also explains that the SA was one of a number of factors feeding into the selection process. Paragraphs 7.73 to 7.91 provide more detailed reasons why each area of search was selected or otherwise.</p> <p>The consultation met the requirements of SEA Directive/Regulations as the SA Report presented the assessment of all reasonable alternatives. Early and</p>

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	<p>Also claims that plans to meet Oxford’s unmet housing need are premature as they are ahead of finalisation of the government’s uniform methodology for calculating OAHN and the forthcoming publication of Oxford’s own housing figures. Also concerned that Regulation 18 consultation consisted only of high level options but Council do not intend to revise plan after this Regulation 19 consultation. Suggests decisions were made using inappropriate scale data, including the LUC Spatial Options Assessment RAG rating in relation to arriving at the Growth Board’s apportionment figure.</p> <p>States that the Regulation 18 Local Plan consultation document did not make it clear that preferred areas of search had been identified and that detailed work had been undertaken to assess these two areas of search only.</p> <p>Concerned that presenting the appraisal of the same nine areas of search in the current SA Report is unhelpful. Also claims that the SA suggests seven of the nine areas for search have little or no potential to support a Partial Review allocation.</p> <p>States that appraisal of HELAA sites in isolation should have been an interim (not a final) step to generate genuine reasonable alternatives. There was a need to examine mutually exclusive alternative packages of site options. Note that the Transport Assessment defined a discrete range of three alternative combinations of site options.</p> <p>Presents comments on the consideration and assessment of Shipton on Cherwell Quarry to demonstrate ‘the failure in methodology’. This relates to the Council’s explanation for not progressing the site at paragraph 10.102 of the SA Report.</p> <p>Level 2 SFRA – States it is not clear whether the work was completed in time to inform consideration of options. States that the Level 2 SFRA identifies Begbroke as more constrained by flood risk than Islip with regards to fluvial and surface water flood risk, yet the SA Report finds the two areas to be of compatible flood risk (‘minor negative effects’) referencing only the level 1 SFRA.</p> <p>Draft Cherwell Water Cycle Study – States that it is not clear whether the work was completed in time to inform consideration of options. The</p>	<p>effective consultation started with the SA Scoping Report (2015), followed by the Initial SA Report (2016), which related to the November 2016 Options Paper. The Options Paper SA included an assessment of the vision and spatial objectives, the areas of search, quantum of additional development options and site options. Note that, whilst related, the Town and Country Planning (Local Planning) Regulations, the SEA Directive and the Aarhus convention are separate and do not cross-refer to one another. As such, the SEA Directive contains no requirement to consult on the SA Report alongside a draft plan under Regulation 18. Article 8 of the SEA Directive simply requires the Environmental Report (i.e. the SEA Report) and comments received on this to be taken into account during plan preparation, before its submission to the SoS and adoption. This has occurred through previous stages of the SA and the 2017 SA Report was also been considered by Cherwell District Council in finalising the Local Plan Review.</p> <p>Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 2 of the SA Report. These assumptions are based upon an agreed SA Framework that has been subject to consultation and is set out in Chapter 5 of the SA Report and help to ensure the process is consistent and robust.</p> <p>The SA Report is required to present information on the entire SA process, including assessment of reasonable alternatives. The ‘repetition’ of assessments allows all relevant information on the SA process to be included in the final SA Report. It is assumed claims that seven of the areas of search have no potential to support a Partial Review allocation refers to paragraph 7.74 (states Areas of Search C to I would not sufficiently deliver the Partial Review’s vision</p>

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	<p>study clearly identifies certain wastewater treatment works as more constrained than others, yet the SA gives negligible effects for all options, stating that effects of development on water quality are 'dependent on the scale of development and capacity at the local sewage treatment works'.</p> <p>PR38 Oxford – Cambridge Expressway Strategic Study – Stage 3 Report – States this study is mentioned in the Plan and the SA but no effort is made to draw out implications of this for the Partial Review i.e. possible major new expressway passing between Bicester and Oxford, along the A34.</p> <p>Concerns that analysis within the SA is overly mechanistic with little qualitative assessment/professional judgement applied, which may have reduced the ability to differentiate between sites. Suggests the objectives/criteria that could not be applied to the appraisal should have been screened out in order to make the report more accessible. Concerned that options were not refined and there is little to indicate that new evidence/understanding was taken into account. Notes that all sites at Islip are appraised as benefitting from being 'within 2.5km of a train station', even when sites are adjacent to the station. States the SA fails to differentiate between the merits of sites with regards to the quality of agricultural land to be lost. Particularly points out the area of Grade 2 agricultural land to the west of Kidlington (PR8). Raises concerns that no consideration is given to the location of AQMAs. Particularly notes that sites options on the edge of Kidlington, which would increase traffic through the Kidlington AQMA, are not judged to perform any worse than other options. States that no weight is given to the importance of supporting the achievement of economic growth objectives within the Oxford to Cambridge Corridor. Concerns the SA fails to differentiate between merits of sites in terms of flood risk, even when extent of site covered by a flood risk zone is vastly different. Notably PR8 is not shown to perform relatively poorly in respect of flood risk, despite the fact it was deemed suitable for allocation only following an Exception Test. States that there is no basis for Area B to be deemed to compromise landscapes that are more sensitive than those in Area A for the reason it is more rural. Raises concerns that proximity to the Shipton-on-Cherwell & Whitehill Farm Quarries SSSI is repeatedly referenced as an ecological constraint, despite the fact that it is designated for geological value only.</p>	<p>and objectives) – this conclusion has been drawn after considering the SA and other evidence base documents.</p> <p>It was not appropriate to package up site options into mutually exclusive alternative packages for the SA Assessment of the Areas of Search provided a similar assessment by considering the concept of development in those areas at a more general level. The Transport Assessment is a separate assessment to the SA and considered three 'development scenarios' that could deliver 4,400 homes. It is considered that the most effective way for the SA to assess reasonable alternatives is on a site by site basis.</p> <p>The assumptions for SA objective 12 in Appendix 2 of the SA demonstrate that the SA focused on Environment Agency Flood Zones.</p> <p>The Water Cycle Study is referenced in para 3.42 of the SA Report. This confirms that the WCS has demonstrated achievable solutions to ensuring wastewater from additional development is treated, with the exception of Oxford WWTW. Para 10.327 and 10.328 of the SA recognise that the WCS recommendations need to be carried forward by CDC, Thames Water and developers to generate the predicted minor positive effects record in the SA.</p> <p>The Oxford-Cambridge expressway is associated with a lot of uncertainty. As per comments received from Highways England, this cannot be taken into account at this time in terms of transport impacts.</p> <p>Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 2 of the SA Report. These assumptions are based upon an agreed SA Framework that has been</p>

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	<p>SA NTS – Considered too long to be accessible to the general public. Concerns that NTS does not conclude on the effect resulting from the Partial Review but the effects that will result from ‘the adopted Local Plan Part 1 and the Local Plan Part 1 Partial Review’.</p> <p>Raises concerns that para 184 of the SA NTS concludes the outcome of air quality will be positive and that there will be significant positive effects on biodiversity as policies are proposed to mitigate the impacts of growth. States that discussion of effects concludes (paras 1.191 to 1.195) with a discussion of baseline issues with little relevance to the Partial review (e.g. HS2).</p> <p>Raises concerns that the report does not present suggested recommendations/mitigation measures.</p> <p>States that there is no analysis to justify the conclusion that <i>‘the options and policy approaches that have been taken forward in the Local Plan are those that perform more positively, or at least well, against the SA objectives than the rejected options’</i>.</p> <p>Raises concerns that the conclusions section includes much discussion of the plan’s predicted positive effects but only one sentence mentions of negative effects.</p> <p>Appendix B of reps: Transport study</p> <p>Concerns that the SA could not have been properly informed by the TA (Transport Assessment work (ITA, 2017) as the SA was published first. Assessment of Area A having mixed effects (+ +/-) on SA objective 10 is at odds with modelling work that indicates proposed allocations around the A44 will lead to severe adverse impacts on road congestion.</p> <p>Paragraphs 7.38 to 7.40 of SA Report summarise findings of ITP’s transport work as a green rating for Area A, but no reference is made to adverse impacts on road congestion, which is misleading.</p> <p>Paras 7.87 to 7.91 of SA, setting out reasons for selecting Areas A and B, fail to acknowledge significant adverse road congestion impacts of development in Area A.</p> <p>Concerns that the SA fails to recognise any negative impacts of introducing significant additional traffic to the A44 corridor is carried through all assessments. All assessments also fail to refer to the fact that Objective 10 covers both air quality and road congestion.</p>	<p>subject to consultation and is set out in Chapter 5 of the SA Report and help to ensure the process is consistent and robust.</p> <p>The reference to sites at Islip being within 2.5km of the train station reflects the assumptions presented in Appendix 2 of the SA.</p> <p>Assumptions in Appendix 2 differentiate between Grades 1 and 2 agricultural land (best and most versatile) and Grade 3 agricultural land (which may be BAMV if Grade 3a, but this is unknown). The assessment of PR8 acknowledges presence of Grade 2 agricultural land at this site.</p> <p>Assumptions in Appendix 2 consider potential impacts on AQMAs and relationships between areas of search/sites and AQMAs is referenced repeatedly in the assessment matrices in Appendices 4 and 6.</p> <p>Specific assessment against the economic growth objectives of the Oxford to Cambridge corridor is outside the scope of this SA. Economic effects have been assessed via SA Objectives 16 and 17.</p> <p>PR8 has been assessed as having negligible effects on flood risk, as the areas of the site within Flood Zones 2 and 3 will be retained as green space.</p> <p>Shipton-on-Cherwell & Whitehill Farm Quarries SSSI has not been assessed, or referred to, as an ecological constraint. Whilst SA 7 has been referred to as ‘Conserving and enhancing biodiversity’ for brevity, the assumptions in Appendix 2 clarify that geodiversity is also relevant to this SA objective, hence the SSSI is discussed with regards to options that may affect the quarry, in line with these assumptions.</p>

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		<p>NTS</p> <p>The length of the NTS relates to the required information that it must contain, which is set out in the SEA Regulations. Every effort has been made to present such information in an accessible way. Conclusions of the adopted Local Plan Part 1 and the Local Plan Part 1 Partial Review have been presented, as the Partial Review will sit alongside the adopted Local Plan to form the whole Local Plan. As such, this is considered the best way to convey the likely effects of the plan as a whole, taking into account the Partial Review. This assessment presents the overall effects of the Plan, which includes positive effects associated with air quality and biodiversity.</p> <p>Paragraph 10.383 onwards of the SA Report details the main recommendations made by the SA and the amendments made to the Local Plan Review in light of these. Paragraph 10.386 onwards identifies the policies within the adopted Local Plan Part 1 that are expected to provide mitigation for the potential negative effects of the policies within the Local Plan Part 1 Partial review. Recommendations and mitigation are discussed from paragraphs 1.196 to 1.199 of the NTS.</p> <p>The statement that the options and policy approaches taken forward are generally those that perform more positively is supported by the assessments of options and policy approaches recorded in the SA Report.</p> <p>The conclusions section in the NTS is a brief overview of the process and focuses on likely significant effects arising from the plan. Both significant negative and significant positive effects have been acknowledged.</p> <p>Transport study</p> <p>Whilst the SA was published before the Transport</p>

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		<p>Study, ITP communicated the results of the study, including the results of the RAG assessment, to LUC and the Council prior and in time to inform the SA</p> <p>Assessments on air quality and congestion were undertaken in line with the assumptions presented in Appendix 2 of the SA Report. The transport study reports on traffic congestion.</p>
Hanwell Parish Council	<p>Rejects the idea that Green Belt development can be the most sustainable option, stating it is inherently unsustainable. States development should be located <i>'on the sustainable sites it [the Council] has identified elsewhere in the district'</i>.</p> <p>States that planned housing for Woodstock would put undue stress on local infrastructure and services, threaten the World Heritage Site prospect, damage the rural environment and risk turning this historic town into an Oxford suburb.</p>	<p>Noted.</p> <p>The SA assessed all reasonable alternatives identified by the Council.</p> <p>Information on infrastructure capacity is not available on a consistent basis between sites. As SA is a strategic process, it has been assumed that the relevant infrastructure upgrades will be made as appropriate for all proposed development.</p>
TMP Planning Ltd on behalf of Gosford and Water Eaton Parish Council	<p><u>Areas of Search Appraisal (1.93 – 1.113)</u></p> <p>Reiterates concerns raised at Option Consultation stage. Comments are in relation to Area A – Kidlington.</p> <p>State that benefits to health and wellbeing are overstated as facilities do not have capacity to accommodate the proposed level of growth.</p> <p>Raises concerns about potential impacts on congestion and air quality, particularly given the proximity of existing AQMAs. Stresses the need for sustainable transport links to minimise this impact.</p> <p>States that effects on SA Objective 5 will be significant through the construction and operational phases due to issues including increased noise, light and traffic pollution.</p> <p>Considers impacts of coalescence have been understated with regards to SA objective 8 and states that this issue should be given greater weight.</p>	<p>Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 2 of the SA Report. These assumptions are based upon an agreed SA Framework that has been subject to consultation and is set out in Chapter 5 of the SA Report. Information on infrastructure capacity is not available on a consistent basis between sites. As SA is a strategic process, it has been assumed that the relevant infrastructure upgrades will be made as appropriate for all proposed development.</p> <p>SA of Area of Search A acknowledges the proximity to the Oxford AQMA, with regards to SA Objective 10. The SA drew on ITP's Transport Assessment when considering impacts on traffic and transport.</p> <p>The assumptions presented in Appendix 2 explain that</p>

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	<p><u>Site Options within Areas of Search A and B Appraisal</u> The above concerns also apply to appraisal of site options.</p> <p><u>Strategic Policies and Preferred Site Allocations Appraisal</u> Disagrees that Policy PR1 will have positive effects on pollution and congestion, given that increased road traffic will be generated in areas already suffering from pollution. This comment also applies to the housing site allocations that perform the same (mixed positive/negative effects) against this objective.</p> <p>Supports assessment of negative effects with regards to biodiversity, landscape, historic environment, efficient use of land and resource consumption and in terms of cumulative effects.</p>	<p>effects of SA objective 5, with regards to operational impacts on existing communities, are largely dependent on developmental design. Both construction and operational phases have been considered in the assessment.</p> <p>The assessment of SA objective 8 is clear that effects are somewhat dependent on the layout and landscaping of development, therefore uncertainty is recorded.</p> <p>Policy PR1 contains many requirements and therefore is recorded as having mixed effects. The policy requires development to deliver the vision, objectives and policies of the partial review and deliver sustainable development, which is likely to have positive effects on pollution and congestion, as well as the negative effects identified. With regards to housing sites, positive effects relate to proximity to existing public transport routes as per ITP's Transport Assessment.</p>
West Waddy ADP on behalf of J A Pye (Oxford) Ltd	<p>Owns land at Webb's Way, Kidlington (site ref 32).</p> <p>States that new developments will not be served by or support Kidlington village centre, as many sites are not located close to this and therefore new service centres are proposed through policies PR8 and PR6a. Suggests some development should be located closer to Kidlington Village Centre.</p> <p>Outlines benefits of site 32. States that reasons given for rejection of the site in the SA are not valid for the following reasons:</p> <ul style="list-style-type: none"> - Site would not perform any worse than other greenfield sites with regards to agricultural land quality and greenfield development. - Character of Cherwell Valley and Kidlington conservation area would be protected as site is small (3.447 ha) and a large part would be retained as open space. - Due to small size of site, there would not be a significant increase 	<p>Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 2 of the SA Report. These assumptions are based upon an agreed SA Framework that has been subject to consultation and is set out in Chapter 5 of the SA Report.</p> <p>SA is a strategic process that assesses options on a comparable basis. It cannot consider evidence reports produced for individual sites, as these are not available for all sites. The SA has drawn on evidence that is available consistently across the plan area.</p>

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	<p>in traffic through the village. Consultee has provided a Landscape and Visual Appraisal and Transport Statement to support these points.</p>	
<p>Begbroke Parish Council</p>	<p>Suggests that sites PR9, PR8 and PR3e together would have a ‘devastating effect’ on the Green Belt.</p> <p>Suggests that there are more sustainable alternative site options within or nearer to Oxford city to meet Oxford’s housing need and gives examples of Showman’s Field and Marston Saints Sports Field. Also suggest various other options are more suitable, including sites within Oxford and Bicester Sites A&G Blackthorn and Arncott.</p> <p>Disagree that there is need for a cautious approach to developing land outside the Green Belt at Woodstock due to presence of heritage assets as <i>‘The palace [Blenheim Palace] views would not be affected unless there plans to build on the palace grounds in full view of the palace which has not been suggested. Other world heritage sites have been able to build around those kind of places.’</i></p> <p>Suggests that discounting Areas of Search C to I is unfounded as the user catchment for Oxford Park and Ride facilities extends beyond the county, therefore showing that ‘people are prepared to travel’. Suggests improved public transport services to areas of the catchment that are further afield would be a better alternative to development on Green Belt land. Also suggest the Areas of Search could have included more areas.</p>	<p>Green Belt is a policy designation. A strategic Green Belt Study was been prepared jointly by Oxfordshire Growth Board, including Oxfordshire County Council and the constituent Districts.</p> <p>A strategic and proportionate approach has been taken to forming and assessing the Areas of Search in order to identify the most appropriate broad areas for accommodating a proportion of Oxford’s unmet housing need. The SA assessed all reasonable alternatives identified by the Council. The Council’s reasons for selecting Areas of Search A and B (and for not selecting other options) are detailed in Chapter 7 and the Council’s reasons for selecting preferred site allocations (and not selecting others) are detailed in Chapter 10.</p> <p>The setting of a heritage asset consists of more than views to and from the asset, it includes the context and experience of that asset as part of its surroundings.</p> <p>Improvements to transport infrastructure in north Oxford/A44/A4260 are discussed in the proposed Submission Plan. This is also true for the Park and Ride proposal. The SA assesses proposals against the existing baseline, rather than against potential future projects.</p> <p>The SA drew on ITP’s Transport Assessment when considering impacts on traffic and transport. The transport assessment has also directly informed the Plan making process.</p>

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South Oxfordshire District Council	<p>With regards to housing figures, requests clarification on what would be considered 'significantly' more or less than 4,400 homes.</p> <p>Questions the implications of different housing numbers as the numbers do not appear to relate to any spatial strategy.</p>	<p>The SA has assessed the implications of more or less homes in District with a view to capturing changes and differences in sustainability effects across the District. The housing quanta is assessed in the context of a strategy which locates development in areas A and B. The degree of uncertainty regarding this has been reflected in the assessments.</p>
CPRE Oxfordshire	<p>Suggests that there are a number of reasonable alternatives to development of Green Belt land, such as building elsewhere in the District and increasing densities, including in the City of Oxford itself. States that the Council should have declined to accommodate any need that requires Green Belt development and this should be met by neighbouring authorities. Particularly supports increasing densities and notes that the housing figures do not take account of the new draft methodology for calculation of objectively assessed need.</p> <p>Objects to the Councils reasoning that development to meet Oxford's unmet need needs to be in close proximity to Oxford.</p> <p>Objects to allocation at Woodstock, referencing objections to a similar scheme proposed in the past. In particular, CPRE requests that the Council conduct a heritage impact assessment of this site.</p>	<p>The way in which the Council identified reasonable alternative Areas of Search is explained in Chapter 7 of the SA report (para 7.12 onwards). The Council's reasons for selecting Areas of Search A and B and not selecting other Areas are detailed in Chapter 7 of the SA Report (paragraph 7.69 onwards). The Council's reasons for selecting preferred site allocations (and not selecting others) are detailed in Chapter 10.</p> <p>A Duty to Cooperate exercise has been undertaken within Oxfordshire to apportion Oxford City's unmet needs.</p> <p>The sustainability implications for the allocation at Woodstock are assessed in Appendix 6 and 7 of the SA Report.</p>
Wendlebury Parish Council	Supports selection of Areas of Search A and B.	Noted.
Woodstock Parish Council	<ul style="list-style-type: none"> • Suggests a need to consider cumulative impacts of Cherwell and West Oxfordshire proposals. • With regard to paragraph 10.31 of the SA, no approval has yet been issued for application 16/01364/OUT. • With regard to Paragraph 10.34 the site does not lie adjacent to Woodstock. 	<p>Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 2 of the SA Report. These assumptions are based upon an agreed SA Framework that has been subject to consultation and is set out in Chapter 5 of the SA Report.</p> <p>With regard to application ref. 16/01364/OUT, please see Council's reasons provided in paragraphs 10.23-</p>

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	<ul style="list-style-type: none"> The tables on pages 723-729 of the SA Report show that this site does not score highly in many or the primary objectives of the SA. 	<p>10.36 for development of Site PR10.</p> <p>With regard to paragraph 10.34, the north-western edge of PR10 lies adjacent to Woodstock.</p>
Carter Jonas LLP on behalf of Mr M Smith	<p>States that the Council has not considered all reasonable alternatives as the promoted site has not been included for residential development.</p> <p>Supports the SA assessment that development at the site would have significant positive effects in relation to employment opportunities, access to services and facilities and reducing air pollution.</p>	The Council's reasoning for the selection of sites is set out in Chapter 10 of the SA Report.
Oxford Preservation Trust	<p>Notes that the Sustainability Appraisal carried out by LUC as part of this Partial Review includes a high level assessment of the proposed sites against an objective to "protect, enhance and make accessible for enjoyment, the historic environment." (SA Objective 9). Notes that the SA indicates development of housing in Cherwell has potential for negative or unknown impacts on the historic environment.</p> <p>Raises concerns that there has been no detailed assessment of the significance of relevant historic assets or the significance of their settings, to inform decisions, particularly as this has resulted in lack of clarity and certainty regarding effects. Suggests this has also resulted in a lack of suggestions for mitigating any harmful impacts. States that the benefits of developing these areas have been assessed as outweighing the harm in all cases.</p> <p>Raises concerns that development at PR6a and PR6b will harm Oxford's green setting and lead to coalescence of Oxford with Kidlington. Also concerned that potential development sites included in Oxford City's Local Plan 2036 Preferred Options document (particularly site 107) have not been considered in combination with site PR6a.</p> <p>Raises concerns that the Environment Agency's planned Flood Alleviation Scheme has not been taken into account in the Partial Review. Suggests that assessment of potential development sites should consider downstream changes to flooding, including in Oxford.</p>	<p>Noted.</p> <p>Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 2 of the SA Report. These assumptions are based upon an agreed SA Framework that has been subject to consultation and is set out in Chapter 5 of the SA Report.</p> <p>Impacts on the historic environment have been assessed via SA Objective 9. Landscape impacts have been assessed via SA Objective 8. Flood risk impacts have been assessed via SA objective 12.</p> <p>In-combination effects with Oxford City Council's emerging Local Plan have been discussed in chapter 10 of the SA Report. It is however, noted that Oxford City's Local Plan is subject to change, as it has not yet been adopted.</p> <p>The SA assesses the Local Plan Review against the current baseline, rather than future potential projects.</p>
Edgars Limited on behalf of Mr and	Note that this site has not been assessed in SA as development site, but is assessed under Policy PR3. Note that SA records mainly positive effects, but potential negative effects are recorded with regards to impact on	The SA assessment of PR3 considers the possibility of development on this site in a proportionate way.

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Mrs Tomes	<p>heritage assets.</p> <p>Edgars consider that sensitive residential development of the land to the rear of the cottages can be achieved without significant adverse heritage impacts.</p>	<p>Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 2 of the SA Report. These assumptions are based upon an agreed SA Framework that has been subject to consultation and is set out in Chapter 5 of the SA Report. The SA cannot take into account additional design and mitigation measures proposed by developers, as they cannot be guaranteed and are not available on a like for like basis between sites.</p>
David Jarvis Associates on behalf of Shipton Limited	<p>It is noted that the SA (and the assessments that informed it) have overlooked the fact that the site has a permitted use following restoration which includes a railhead aggregates depot, concrete batching plant, asphalt coating plant, rail storage depot, B8 storage use with two storage buildings and further temporary buildings and uses. While the SA recognises that the site is brownfield in the context of a former quarry, it should be considered in the context of the above permitted uses.</p> <p>Following a review of the evidence base and the scoring of the sites in the Sustainability Appraisal, it is considered that further assessment work is likely to result in the site receiving a more favourable outcome to the extent that it should be considered a potential strategic development site. An alternative SA is provided in the representation.</p>	<p>A strategic and proportionate approach has been taken to forming and assessing the Areas of Search in order to identify the most appropriate broad areas for accommodating a proportion of Oxford's unmet housing need.</p> <p>Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 2 of the SA Report. These assumptions are based upon an agreed SA Framework that has been subject to consultation and is set out in Chapter 5 of the SA Report.</p>
Define on behalf of William Davies	<p>The Council's position is not supported by the evidence base, and the soundness of the Plan has been fundamentally undermined as a consequence. It has simply relied on a flawed Sustainability Appraisal of very broad development options that seeks to justify predetermined policy decisions, rather than a detailed assessment of the opportunities within the wider District that could complement the strategic allocations currently proposed in the Submission Plan as part of a more balanced development strategy.</p> <p>A broader (but still sustainable) development strategy and with a higher level of overall provision would provide the essential flexibility in the strategy to accommodate for any shortfalls arising in the District.</p>	<p>A strategic and proportionate approach has been taken to forming and assessing the Areas of Search in order to identify the most appropriate broad areas for accommodating a proportion of Oxford's unmet housing need.</p> <p>Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 2 of the SA Report. These assumptions are based upon an agreed SA Framework that has been subject to consultation and is set out in Chapter 5 of the SA Report.</p> <p>The way in which the Council identified reasonable</p>

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		<p>alternative Areas of Search is explained in Chapter 7 of the SA report (para 7.12 onwards). The Council's reasons for selecting Areas of Search A and B and not selecting other Areas are detailed in Chapter 7 of the SA Report (paragraph 7.69 onwards).</p>
<p>Turley on behalf of Hill</p>	<p>The proposed apportionment by the growth board has not been subject to Sustainability Appraisal and as such there remains uncertainty that having agreed to the apportionment figures whether these authorities will in fact be able to deliver these requirements.</p> <p>Support the proposed spatial strategy which reflects the importance of the interrelationship of the allocations with Oxford city whilst also not prejudicing the existing spatial strategy to meet the needs of Cherwell District as set out in the adopted Local Plan Part 1.</p> <p>An assessment is provided of the Council's SA and the representation concludes that the land south east of Kidlington is an appropriate and sustainable location to accommodate development to meet the needs of Oxford City.</p>	<p>Noted.</p>
<p>Clive McDonnell</p>	<p>Considers the proposed submission plan, associated policy maps and sustainability appraisal to be unsound, not positively prepared, not justified and not effective for the reasons detailed in specific objections and comments.</p>	<p>A strategic and proportionate approach has been taken to forming and assessing the Areas of Search in order to identify the most appropriate broad areas for accommodating a proportion of Oxford's unmet housing need.</p> <p>Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 2 of the SA Report. These assumptions are based upon an agreed SA Framework that has been subject to consultation and is set out in Chapter 5 of the SA Report.</p> <p>The way in which the Council identified reasonable alternative Areas of Search is explained in Chapter 7 of the SA report (para 7.12 onwards). The Council's</p>

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		<p>reasons for selecting Areas of Search A and B and not selecting other Areas are detailed in Chapter 7 of the SA Report (paragraph 7.69 onwards).</p>
<p>Elizabeth McDonnell</p>	<p>The Sustainability Appraisal is unsound and in consistent with the NPPF, failing to provide sustainable development which ensures a better life for both current and future generations, this is on the grounds that it fails to:</p> <ul style="list-style-type: none"> • Promote realistic sustainable transport. • Protect green belt land. • Meet the challenge of climate change and resultant flooding. • Conserve and enhance both the natural and historic environments. <p>The proposed submission plan, associated policy maps and sustainability appraisal are unsound, not positively prepared, not justified and not effective for the reasons detailed in specific objections. Throughout the proposal no mention is made of the requirements for increased utility provision in terms of electricity, gas, communication and water/sewage infrastructures, this is despite each of these being highlighted as an issue in the sustainability appraisal.</p>	<p>The SA has been carried out by independent consultants.</p> <p>Site options for accommodating a proportion of Oxford’s unmet housing need have been assessed within Areas of Search selected by the Council. This decision has been based on the SA of the Areas of Search and other objective evidence.</p> <p>The Council has produced separate evidence considering infrastructure.</p>
<p>Tara J Prayag</p>	<p>The SA is incredibly difficult to understand and make sense of. It is a high level study, based on a number of assumptions and subjective judgements, and therefore can only have limited value in assessing the suitability of locations for development.</p> <p>Area A - Kidlington and the surrounding area - appears to perform well against some of the criteria, notably access to services, the assessment also highlights a number of potential negative effects, notably on landscape, biodiversity and heritage.</p> <p>Given the scale of development proposed, the benefits to health and well-being (objective 2) (measured by proximity to existing public services e.g. doctor’s surgeries, sports facilities and open space etc.) is overstated. These facilities are provided to serve existing communities, and will not be able to cater for new residents as well, without significant expansion/investment. Any large scale development would need to provide new services for new residents. The SA sets out that for Area of Search A, Kidlington, there is potential for both negative and positive effects on air quality and congestion (Objective 10).</p>	<p>A Non-technical summary has been produced.</p> <p>A strategic and proportionate approach has been taken to forming and assessing the Areas of Search in order to identify the most appropriate broad areas for accommodating a proportion of Oxford’s unmet housing need.</p> <p>Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 2 of the SA Report. These assumptions are based upon an agreed SA Framework that has been subject to consultation and is set out in Chapter 5 of the SA Report.</p> <p>The way in which the Council identified reasonable alternative Areas of Search is explained in Chapter 7 of the SA report (para 7.12 onwards). The Council’s</p>

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	<p>Concerned about the potential impacts on congestion arising from such large-scale development. On objective 5 (creating and sustaining vibrant communities), the potential for negative effects on existing communities is significant, and not just through the construction phase, but also once built through increased noise, light and traffic pollution, for example. At a high level of assessment as that used in the SA, there should be a recognition that significant adverse effects are possible, and that careful consideration needs to be given to help minimise these given planned development will increase the current local housing by over 108%.</p> <p>There is some recognition of the impact of settlements coalescing under Objective 8 (landscape), but that this is understating the impact. In terms of sustainability, the potential that existing settlements will lose their identity and merge together is a major consideration for current and future generations. It should be given greater weight.</p> <p>Strategic Policies and Preferred Site Allocations Appraisal It is noted that Policy PR1, a key policy for the Plan shows mixed positive/negative effects on pollution and congestion. Not convinced that there are positive effects on this objective given that increased road traffic will be generated in areas already suffering from pollution. This comment also applies to the housing site allocation which perform the same against this objective. In terms of the site allocations also noted that the housing sites within the Parish are shown to have potential negative effects on biodiversity, landscape, historic environment, efficient use of land and resource consumption. This reiterates concerns expressed in other parts of our responses that there are significant environmental consequences arising from these allocations. Page 54 of the SA looks at cumulative effects and again highlights negative effects as highlighted above when you look at the effects of all development proposed.</p>	<p>reasons for selecting Areas of Search A and B and not selecting other Areas are detailed in Chapter 7 of the SA Report (paragraph 7.69 onwards).</p>
Gordon and Helen Henning.	<p>The Plan is not justified or effective in terms of SA Objective 10 (air pollution/road congestion).</p>	<p>A strategic and proportionate approach has been taken to forming and assessing the Areas of Search in order to identify the most appropriate broad areas for accommodating a proportion of Oxford's unmet housing need.</p> <p>Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 2 of the SA Report. These assumptions are</p>

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		<p>based upon an agreed SA Framework that has been subject to consultation and is set out in Chapter 5 of the SA Report.</p> <p>The way in which the Council identified reasonable alternative Areas of Search is explained in Chapter 7 of the SA report (para 7.12 onwards). The Council's reasons for selecting Areas of Search A and B and not selecting other Areas are detailed in Chapter 7 of the SA Report (paragraph 7.69 onwards).</p>
Andrew Hornsby Smith	<p>The appraisal and choice of sites due to the weighting attached to the criteria in both the Green Belt Study and the Sustainability Appraisal result in skewed assessments that place heavy weighting on access to transport infrastructure and employment potential, and very little emphasis on harm to the Green Belt.</p> <p>The following criteria should be added:</p> <ul style="list-style-type: none"> Effect on Green Belt purposes. (The principle here is that some Green Belt land is strategically more important than other Green Belt land.) Ability to integrate with existing built community Defensible boundary Economic benefit to Kidlington area Proximity to area of high landscape value (the land east of the A4165 between the A34 and Cutteslowe was designated as part of the Otmoor area of 'high landscape value' in the 1996 Local Plan). 	<p>Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 2 of the SA Report. These assumptions are based upon an agreed SA Framework that has been subject to consultation and is set out in Chapter 5 of the SA Report.</p> <p>These matters are considered in the SA or evidence base for the Local Plan.</p>
Mr Jeffrey Lyes	<p>Cherwell seem to have a political approach to sustainability and have decided to simply offset the environmental loss of Green Belt by saying in Para 1.206 of their Sustainability Assessment: The overall impact on the Green Belt and its purposes, including the amount of land that needs to be removed to effectively implement the Plan, has been considered by the Council in the context of the outcomes of the SA for example in relation to the significant positive effects for affordable housing provision in locations which best help to meet Oxford's unmet housing needs." On that basis the Green Belt might as well not exist. It becomes by definition unsustainable.</p>	<p>The way in which the Council identified reasonable alternative Areas of Search is explained in Chapter 7 of the SA report (para 7.12 onwards). The Council's reasons for selecting Areas of Search A and B and not selecting other Areas are detailed in Chapter 7 of the SA Report (paragraph 7.69 onwards).</p> <p>A Green Belt Study has been produced to inform the Local Plan.</p>

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Philp Skipp	<p>Highlights that the cumulative effects issues referred to in the SA pinpoint many of the environmental concerns that many residents of Begbroke share.</p> <p>The SA report states that, in combination, the adopted Local Plan Part1 and the Local Plan Part 1 Partial Review are likely to have significant negative effects, in relation to a number of SA objectives.</p>	Noted.
Jane Irving	<p>Suggests inclusion of an additional indicator measuring journey times from various points, including points on the boundaries of Cherwell District Council, to ensure that those commuting times are maintained at current 2017 levels. Many residents living in neighbouring districts work in Oxford and are currently helping to meet Oxford's unmet housing need by living outside Oxford. If current commuting times from our residences are not maintained, living closer to Oxford is the only viable solution. This will increase pressure on housing closer to Oxford e.g. in CDC and Oxford, and have the opposite effect of reducing the housing needs identified.</p>	<p>Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 2 of the SA Report. These assumptions are based upon an agreed SA Framework that has been subject to consultation and is set out in Chapter 5 of the SA Report. The Council has produced transport evidence which has directly informed the Partial Review.</p>
Rufus Nicolson	<p>Area of Search H ("Banbury and surrounding area") attracts an additional positive benefit for SA Criteria 3 ("To reduce poverty and social exclusion") in Table 7.2 of the SA, with the result that this area of search scores the highest of any for positive benefits arising from development. This evidence contradicts argument 3 in Section 5.17, which claims that CDC had no other sustainable option for the proposed housing outside of Area of Search A "without causing unacceptable harm to the existing Cherwell development strategy.</p>	<p>Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 2 of the SA Report. These assumptions are based upon an agreed SA Framework that has been subject to consultation and is set out in Chapter 5 of the SA Report.</p> <p>The way in which the Council identified reasonable alternative Areas of Search is explained in Chapter 7 of the SA report (para 7.12 onwards). The Council's reasons for selecting Areas of Search A and B and not selecting other Areas are detailed in Chapter 7 of the SA Report (paragraph 7.69 onwards).</p>
Richard Whitlock	<p>The Sustainability Appraisal is not the clearest of documents and its findings are not conclusive with some options performing in a similar way and with subjective judgements playing a part. The wording of both the draft Plan and Sustainability Appraisal give the impression, albeit perhaps unfairly, that a decision on the Plan's strategy involved some subjective or political input, rather than being a result of an objective and rigorous planning appraisal. Not at all convinced by the Plan's analysis of the options.</p>	<p>Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 2 of the SA Report. These assumptions are based upon an agreed SA Framework that has been subject to consultation and is set out in Chapter 5 of the SA Report.</p>

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	<p>Given the role that Bicester plays already in central Oxfordshire it seems logical to build upon the District's current sustainable strategy when considering how best to meet Oxford's housing needs, especially as the housing need figure both for the District and for Oxford should almost certainly be reduced under the Government's new proposals, leading to fewer houses being needed in Bicester.</p>	<p>The way in which the Council identified reasonable alternative Areas of Search is explained in Chapter 7 of the SA report (para 7.12 onwards). The Council's reasons for selecting Areas of Search A and B and not selecting other Areas are detailed in Chapter 7 of the SA Report (paragraph 7.69 onwards).</p>
Dr James Jocelyn	<p>The Sustainability Appraisal is based on selective evidence.</p>	<p>Each option has been appraised using clearly defined and consistently applied assumptions set out in Appendix 2 of the SA Report. These assumptions are based upon an agreed SA Framework that has been subject to consultation and is set out in Chapter 5 of the SA Report. A proportionate evidence base has been used to inform the SA.</p>