

Sustainability Appraisal (SA) Note: Expanding upon Part 2 of the SA Report

Introduction

AECOM is leading on Sustainability Appraisal (SA) for the emerging Cherwell Local Plan Review 2042 (LPR). A key step in the required SA process was reached in 2024 with the publication of the SA Report alongside the proposed submission version of the LPR under Regulation 19 of the Local Planning Regulations (2012).

Specifically, the requirement is for the SA Report to present an appraisal of “the plan and reasonable alternatives”¹ with a view to informing the consultation / representations, and the report was structured with a view to discharging this requirement as follows:

- Part 1 – presented information on reasonable alternatives (RAs), specifically work to: A) define RAs; B) appraise RAs; and then C) feed back to the Council to inform the decision on the preferred approach for publication.
- Part 2 – presented an appraisal of the Proposed Submission LPR as a whole.

The aim of this current Note is twofold:

- Primarily, the aim is expand upon the appraisal presented in Part 2 of the SA Report, recognising that it is quite concise (16 pages). This conciseness was deliberate, as explained at paragraphs 8.1.8 to 8.1.10 of the report,² essentially with a view to ensuring a focus only on key aspects of a Proposed Submission LPR with a strong bearing on the appraisal conclusions in respect of significant effects. However, it is now considered helpful to expand the appraisal slightly without changing the appraisal in any substantial or even substantive way. Specifically, whilst each of the appraisal narratives within Part 2 of the SA Report (one per SA topic; 13 in total) discussed individual policies only as necessary (to appraise the LPR as a whole, in terms of significant effects), it is now considered appropriate to systematically consider every policy within the LPR under each SA topic. It is important to be clear that the aim is not to predict significant effects (the conclusions on significant effects within the SA Report are unchanged), but simply to provide additional insight into the merits of the plan and individual policies.
- Secondly, the aim is to supplement the appraisal in Part 2 of the report in respect of employment land supply.

Expanding upon Part 2 of the SA Report

Part 2 of the SA Report presents an appraisal of the Proposed Submission LPR under the SA framework (13 SA topics) and where an ‘appraisal’ involves reaching conclusions on significant effects. As set out at the beginning of Part 2:

“The aim here is to present an appraisal of the Proposed Submission LPR as a whole... In practice, the appraisal builds upon the appraisal of Growth Scenario 1 presented in Section 6. Specifically, the appraisal revisits the appraisal of Growth Scenario 1 with added consideration given to: • site allocations that are a ‘constant’ across the growth scenarios appraised in Section 6; and • draft policies (both district-wide and site-specific).”

The conclusion of the appraisal is presented at Table 9.1 within the SA Report, which specifically presents: A) the conclusion reached on Growth Scenario 1 (the preferred growth scenario) as part of the appraisal of RA growth scenarios in Part 1 of the Report; and B) the conclusion reached on the Proposed Submission LPR as a whole, i.e. the Growth Scenario 1 plus wider aspects of the plan. A headline conclusion is:

“Having taken account of development management policies... which are not entirely taken into account as part of the growth scenarios appraisal... it is possible to reach more positive conclusions for the plan as a whole under a number of headings relative to the conclusions reached for [the preferred growth scenario in Part 1].”

¹ Regulation 12(2) of the Environmental Assessment of Plans and Programmes [SEA] Regulations 2004.

² “The appraisal aims to be systematic and to explain assumptions. However, there is also a need for conciseness and accessibility, for example noting that a Government Committee in 2022 emphasised a need to: “streamline the current bureaucracy and overcomplication associated with... assessments.” Also, in 2023 SA was described within a Government consultation as “... a nightmare... unintelligible...” ... In practice, there is a particular focus on the proposed approach to land supply / spatial strategy or, in other words, the proposed allocations in isolation and in combination (also accounting for permissions)... This approach is also taken mindful that the Government’s Planning Practice Guidance (PPG) is clear that SA should focus on significant effects, which translates as a need to focus primarily on the merits of the proposed approach to land supply (allocations and broad locations; see NPPF paragraph 69) to meet objectively assessed needs and wider plan objectives. There is inherently relatively limited potential to predict significant effects for district-wide thematic policy, mindful that significance is defined in the context of the plan as a whole. Equally, it is the proposed approach to land supply / spatial strategy that generates overwhelmingly greatest interest amongst local residents and... stakeholders.”

Table 9.1 from the SA Report is repeated below as Table A but with the addition of one extra column. Specifically, in order to provide additional insights a column is added that answers the question: *Was Scenario 1 best performing?*

With regards to the final two columns in Table A (Table 9.1 from the SA Report; also Table D in the Non-technical Summary) the aim here was/is to predict 'significant effects' using **red** (significant negative) / **amber** (moderate/uncertain negative) / **light green** (moderate/uncertain positive) / **green** (significant positive) / grey (neutral).

Table A shows that:

- Air / env quality – a number of alternative scenarios can be identified that are judged to be preferable, but there are no major concerns with the preferred scenario, such that both appraisals (Part 1 and 2) conclude a neutral effect.
- Biodiversity – in Part 1 the preferred scenario is appraised as best performing (alongside several others) but it is not possible to conclude a positive effect. In Part 2, however, a positive effect is predicted for the LPR as a whole.
- CC adaptation – the preferred scenario is best performing (alongside several others), but it is not possible to conclude a positive effect, even after having accounted for all policies, i.e. the LPR as a whole.
- CC mitigation – in Part 1 it is not possible to differentiate between the scenarios, but all are predicted a negative effect. This conclusion is then upgraded to a 'neutral' effect in Part 2, having accounted for the LPR as a whole.
- Communities – in Part 1 the preferred scenario is appraised as best performing (alongside one other) but it is not possible to conclude a positive effect. In Part 2, however, a positive effect is predicted for the LPR as a whole.
- Economy – in Part 1 it is not possible to differentiate between the scenarios, but all are predicted a positive effect. This conclusion then also holds true for the LPR as a whole.
- Historic env – in Part 1 the preferred scenario is best performing (alongside one other) but is predicted a negative effect. This conclusion is then upgraded to a 'neutral' effect in Part 2, having accounted for the LPR as a whole.
- Homes – in Part 1 the preferred scenario is worst performing (alongside one other) but is predicted a positive effect. This conclusion then also holds true for the LPR as a whole.
- Land – in Part 1 the preferred scenario is best performing (alongside several others) but is predicted a negative effect. This conclusion then also holds true for the LPR as a whole.
- Landscape – in Part 1 the preferred scenario is appraised as best performing (alongside one other) but it is not possible to conclude a positive effect. In Part 2, however, a positive effect is predicted for the LPR as a whole.
- Transport – in Part 1 the preferred scenario is appraised as best performing (alongside several others) but it is not possible to conclude a positive effect. In Part 2, however, a positive effect is predicted for the LPR as a whole.
- Water – a number of alternative scenarios can be identified that are judged to be preferable, but there are no major concerns with the preferred scenario, such that both appraisals (Part 1 and 2) conclude a neutral effect.

Table A: Comparison of conclusions reached for Scenario 1 (the preferred growth scenario) and the LPR as a whole

Topic	Was scenario 1 best performing?	Conclusion on Scenario 1	Conclusion on the LPR
Air / env quality	No		
Biodiversity	Yes		
CC adaptation	Yes		
CC mitigation	All scenarios perform on a par		
Communities	Yes		
Economy	All scenarios perform on a par		
Historic env	Yes		
Homes	No		
Land	Yes		
Landscape	Yes		
Transport	Yes		
Water	No		

When reaching a “conclusion on the LPR” in Part 2 of the SA Report individual policies are referenced only as necessary, and specifically where it is possible to make meaningful comment. However, and as discussed, it is now considered appropriate to elaborate with additional reference to specific policies.

Table B includes a column for each of the 13 SA topics that together comprise the SA framework (corresponding with the 13 appraisal sections within Part 2 of the SA Report) and a row for each of the policies within the LPR.

Under each sustainability topic heading the aim is to categorise each policy as follows:

- **Red** – negative implications discussed with the SA Report
- **Amber** – potentially or feasibly negative implications
- **Grey** – no implications of note
- **Light green** – potentially or feasibly negative implications
- **Dark green** – positive implications discussed with the SA Report

N.B. to reiterate the aim is not to predict significant effects.

Finally, within Table B those rows that deal with a site-specific policy are ‘greyed-out’ because site allocations are more appropriately considered in under policies BAN1, BIC1, KID1 and RUR1.

Discussion

With regards to policies with solely or broadly positive implications discussed with the SA Report (**green**):

- CSD2 – deals with net zero development. It is a focus of detailed discussion within the SA Report, including recognising significant viability implications (and, in turn, implications for wider policy asks, e.g. affordable housing and BNG). There is support for the policy under the ‘climate change mitigation’ topic heading, but some questions are raised around changes made to the policy since the Regulation 18 stage (2023).
- CSD6 – deals with renewable energy. It is briefly discussed under the ‘land, soils and resources’ heading.
- CSD9 – deals with water resources and is a focus of discussion under the ‘water’ heading.
- CSD12 – deals with biodiversity net gain. It is a focus of detailed discussion, including recognising significant viability implications (and, in turn, implications for wider policy asks, e.g. affordable housing and net zero).
- LEC1 – is the key policy setting out the employment land strategy and so is a key focus of discussion under several topic headings. The table below records only ‘positive implications’ but, in practice, within the SA Report there is a nuanced discussion of pros and cons of the employment land strategy / package of proposed allocations. The latest situation is that there is some new evidence available in respect of employment land needs – see **Box A**.
- COM1 – is the key policy setting out the housing supply strategy and so is a key focus of discussion under several topic headings. The table below records only ‘positive implications’ but, in practice, within the SA Report there is a nuanced discussion of pros and cons of the housing land supply strategy / package of proposed allocations.
- KID2 – deals with Oxford Airport. It is briefly discussed under the ‘economy and employment’ topic heading.
- HEY1 – deals with Heyford Park. The proposed low growth strategy is broadly supported under a number of topic headings, although there is also a case to be made for growth, as discussed in Section 5 of the SA Report.
- RUR1 – deals with the strategy for the rural area, which is a focus of discussion under the ‘air quality’ topic heading given that transport connectivity is a key consideration in respect of growth in the rural area. Also, there is a detailed discussion within Section 5 of the SA Report (as part of the process to define alternative growth scenarios).

With regards to policies with solely or broadly negative implications discussed with the SA Report (**red**):

- IMP1 – deals with implementation. Whilst it is not an explicit focus of discussion within the SA Report, there is a major emphasis on the need to set clear requirements of developers, with a view to ensuring that requirements can be scrutinised from a viability and ultimately a delivery perspective. This is in the context of many policy requirements being crucially important for the achievement of sustainability objectives.

With regards to policies with both positive and negative implications discussed with the SA Report (**green / red**):

- BAN1 – deals with the strategy for Banbury. It is not an explicit focus of discussion within the SA Report (instead, under each relevant topic heading there is a single discussion of spatial strategy / site allocations in the round) but, for the purposes of this current exercise, it is appropriate to flag certain instances of the appraisal flagging issues/tensions under certain topic headings (five in total). Most significant is flood risk at Canalside.

- BIC1 – deals with the strategy for Bicester. Again (as per BAN1), it is not an explicit focus of discussion within the SA Report, but for the purposes of this current exercise, it is appropriate to flag certain instances of the appraisal flagging issues/tensions under certain topic headings (two in total).
- KID1 – deals with the strategy for Kidlington. Again (as per BAN1), it is not an explicit focus of discussion within the SA Report, but for the purposes of this current exercise, it is appropriate to flag certain instances of the appraisal flagging issues/tensions under certain topic headings (four in total). It can also be noted that Kidlington is flagged as supported under the 'climate change mitigation' heading because the area benefits from relatively strong development viability, which could be supportive of ensuring that net zero development is viable.

These policies fed in strongly to the conclusion on significant effects reached for the LPR as a whole reached under each of the SA topic headings within Part 2 of the SA Report.

All other policies also fed-in but were not explicitly referenced where there was no potential to make meaningful comment, with a view to a targeted, engaging and proportionate appraisal. These are flagged as **green** and **amber**.

With regards to policies flagged 'green' in Table A, many are broadly supportive of sustainability objectives but were not referenced where there was insufficient value to be gained in terms of exploring policy choices made by the Council.

With regards to policies flagged 'amber' in Table A, on the basis that there is feasibly a tension that might have been discussed in the SA Report (but was not with a view to a targeted, engaging and proportionate appraisal):

- CSD1 – there can be a discussion around tensions between net zero homes and heritage objectives.
- CSD2/COM2 – it is fair to say that there is a tension between affordable housing and net zero development objectives, recognising that these are two policy asks with stand-out development viability implications.
- CSD1/4 – there can be a discussion around tensions between net zero homes and indoor air quality objectives.
- CSD15 – there can be a discussion around tensions between green infrastructure and safety / crime objectives.
- LEC8 – there can be a discussion around tensions between rural diversification and landscape objectives.

Box A: Accounting for updated evidence in respect of employment land needs

Employment land needs are discussed in Box 5.1 of the SA Report, before employment land strategy is discussed in Section 5.2, site options are discussed in Sections 5.3 and 5.4 and then a conclusion is reached on how to treat employment land across the reasonable alternative growth scenarios in Section 5.5 (specifically, see Box 5.1).

The conclusion reached in Section 5.5 is that there is no reasonable growth scenario involving higher employment land supply (i.e. supply over-and-above the preferred growth scenario) via allocation of any omission site(s). However, two of the omission sites that do feature across the higher growth scenarios, as defined (Table 5.7), could and likely would deliver as mixed use schemes to include significant employment land, namely Shipton Quarry and Wendlebury.

Within Section 6, which presents the appraisal of reasonable alternative growth scenarios, the appraisal concludes that the growth scenarios perform on a par (i.e. does not conclude a preference for higher growth) but is clear that this is a conclusion reached on balance, for example explaining that "there remains a case for additional supply".

The above analysis is all presented within Part 1 of the SA Report.

Within Part 2 of the SA Report, the appraisal of the Proposed Submission LPR as a whole in respect of 'economy / employment' objectives is presented in Section 9.7. Here there is no discussion of the case for higher growth (bar discussion regarding key reliance on windfall supply), but there is a signpost back to the analysis in Part 1 (Section 6).

The latest situation is that new modelling data is available to inform understanding of employment land needs, with two figures available: a lower need figure of 273.5 ha on the basis of labour demand (Experian forecast) and a higher figure of 358.9 ha on the basis of projecting forward recent completions.

The preferred strategy / supply involves providing for roughly the midpoint, which is considered reasonable, but it is acknowledged that there is a case for boosting supply in order to close the gap to the higher need figure.

Overall, the new evidence means that the case for boosting employment land supply is now greater than was the case at the time of finalising the LPR and SA Report for publication. However, it is not clear that there is a clear case for adjusting the SA Report conclusion, i.e. downgrading the predicted positive effect (see Table A, above) to a neutral.

Conclusion

Part 2 of the SA Report presents a concise appraisal of the LPR as a whole, where an appraisal by definition involves predicting significant effects.

The appraisal in Part 2 of the SA Report builds upon the appraisal of Growth Scenario 1 (the preferred growth scenario) presented in Part 1 of the report (also detailed work undertaken to define the RA growth scenarios).

The LPR appraisal in Part 2 of the SA Report references individual policies only as necessary (i.e. as a means to an end), specifically to inform an appraisal conclusion in respect of the LPR as a whole.

This Note has sought to expand upon the appraisal with reference to specific policies that fed into the appraisal.

Additionally, this Note has discussed the implications of new evidence in respect of employment land needs.

Table B: Table categorising LPR policies according to implications (positive and negative) for sustainability objectives and, in turn, the appraisal of the LPR as a whole

Ref.	Air quality	Biodiversity	CC adaptation	CC mitigation	Community	Employment & economy	Historic env	Homes	Land, soils, resources	Landscape	Transport	Water
SP 1												
CSD 1												
CSD 2												
CSD 3												
CSD 4												
CSD 5												
CSD 6												
CSD 7												
CSD 8												
CSD 9												
CSD 10												
CSD 11												
CSD 12												
CSD 13												
CSD 14												
CSD 15												
CSD 16												
CSD 17												
CSD 18												
CSD 19												
CSD 20												
CSD 21												
CSD 22												
CSD 23												
CSD 24												
CSD 25												
LEC 1												

Ref.	Air quality	Biodiversity	CC adaptation	CC mitigation	Community	Employment & economy	Historic env	Homes	Land, soils, resources	Landscape	Transport	Water
LEC 2												
LEC 3												
LEC 4												
LEC 5												
LEC 6												
LEC 7												
LEC 8												
LEC 9												
LEC 10												
LEC 11												
LEC 12												
LEC 13												
COM 1												
COM 2												
COM 3												
COM 4												
COM 5												
COM 6												
COM 7												
COM 8												
COM 9												
COM 10												
COM 11												
COM 12												
COM 13												
COM 14												
COM 15												
COM 16												
COM 17												

Ref.	Air quality	Biodiversity	CC adaptation	CC mitigation	Community	Employment & economy	Historic env	Homes	Land, soils, resources	Landscape	Transport	Water
COM 18												
COM 20												
COM 21												
COM 22												
COM 23												
COM 24												
COM 25												
COM 26												
COM 27												
COM 28												
COM 29												
COM 30												
COM 31												
BAN 1												
BAN 2												
BAN 3												
BAN 4												
BAN 5												
BAN 6												
BAN M/U 1												
BAN H2												
BAN H3												
BAN M/U2												
BAN E1												
BIC 1												
BIC 2												
BIC 3												
BIC 4												
BIC 5												

Ref.	Air quality	Biodiversity	CC adaptation	CC mitigation	Community	Employment & economy	Historic env	Homes	Land, soils, resources	Landscape	Transport	Water
BIC 6												
BIC H1												
BIC E1												
BIC E2												
BIC E3												
BIC E4												
BIC E5												
KID 1												
KID 2												
KID 3												
KID 4												
KID 5												
KID H1												
HEY 1												
RUR 1												
RUR H1												
RUR 2												
RUR 3												
RUR 4												
RUR 5												
RUR 6												
IMP 1												