



West Oxfordshire Local Plan (2011-2031)

Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) Adoption Statement

September 2018

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West Oxfordshire District Council Local Plan (2011-2031)

Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) SA Adoption Statement

Contents:

This SA Adoption Statement

Development of the West Oxfordshire Local Plan 2031

How environmental & sustainability considerations have been integrated into the Local Plan; How the Sustainability/Environmental Report has been taken into account

How the results of consultation have been taken into account

Reasons for choosing the Local Plan as adopted, in the light of other reasonable alternatives

**Measures that are to be taken to monitor the significant sustainability/
environmental effects of the implementation of the Local Plan**

This SA Adoption Statement

- 1 Sustainability Appraisal (SA) is a systematic process that must be carried out during the preparation of a Local Plan relating to development. SA incorporates the requirements for Strategic Environmental Assessment (SEA) and this Sustainability Appraisal/Environmental Statement for the West Oxfordshire Local Plan has been prepared in accordance with the following requirements:
 - Regulation 26 of the Town & Country Planning (Local Planning) (England) Regulations 2012
 - Regulation 16 of the Environmental Assessment of Plans & Programmes Regulations 2004
 - Paragraph 165 of the National Planning Policy Framework 2012 (paragraph 32 in the NPPF revised, July 2018)

For the purpose of this Statement that complies with planning and environmental assessment Regulations, the integrated appraisal will be referred to as the Sustainability Appraisal (SA).

- 2 The SA process comprises a number of stages that are designed to comply with the requirements of the SEA Regulations and as guided through Government Planning Practice¹. This SA Adoption Statement satisfies the SA/SEA requirements for post adoption (Stage E) and demonstrates compliance with the requirements of the SEA Regulations as follows:

(a) how environmental considerations have been integrated into the plan or programme;

(b) how the environmental report has been taken into account;

(c) how opinions expressed in response to— (i) the invitation referred to in regulation 13(2)(d); (ii) action taken by the responsible authority in accordance with regulation 13(4), have been taken into account;

(d) how the results of any consultations entered into under regulation 14(4) have been taken into account;

(e) the reasons for choosing the plan or programme as adopted, in the light of the other reasonable alternatives dealt with; and

(f) the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan or programme.

Development of the West Oxfordshire Local Plan 2031

- 3 The new West Oxfordshire Local Plan sets planning policies and allocates sites for development up to 2031. Under Policy H2 – Delivery of New Homes, it makes provision for at least 15,950 new homes; the majority of this (13,200 homes; 660 per year) is to meet West Oxfordshire's housing needs but a proportion (2,750 homes during the period 2021-2031) are proposed to assist neighbouring Oxford City Council under the duty to cooperate.

¹ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

- 4 The Local Plan outlines an overall vision for West Oxfordshire by 2031 underpinned by 18 core objectives; and a Spatial Strategy which focuses growth primarily at the District's three main towns (Witney, Carterton and Chipping Norton) together with a new garden village to the north of Eynsham. The plan allocates 5 strategic housing sites, including the Oxfordshire Cotswolds Garden Village, together with 11 smaller 'non-strategic' housing sites at various locations across the District including Witney, Carterton Woodstock and Long Hanborough. The plan also includes a number of general policies to help guide future development dealing with subjects such as affordable housing, housing mix, design, infrastructure, transport, the natural and built environment, heritage, retail and employment.
- 5 Considerable work and consultation has been undertaken over a number of years to prepare the Local Plan, including SA/SEA in accordance with the NPPF (2012) and planning practice guidance. Various studies were undertaken to provide the evidence² base to inform decision-making, including housing, retail, and employment needs; transport, infrastructure & community facilities; flood risk assessments; and landscape/visual impact studies. Systematic assessments of potential site options for possible allocation were also undertaken.
- 6 The Local Plan was submitted to the Secretary of State for independent Examination on 14 July 2015. Stage 1 of the Examination hearing was held in November 2015, after which the Examination was suspended in January 2016 to allow the Council to undertake further studies with regard to housing need and the possibilities for apportioning part of Oxford City's housing needs in the West Oxfordshire area through the Duty to Cooperate.
- 7 Following additional work including the publication of proposed Main Modifications in November 2016, the Examination resumed with the Stage 2 hearing sessions taking place in May 2017 and dealing with a number of general matters including legal compliance, sustainability appraisal, the overall spatial strategy, site selection, the balance of small and large sites, housing need (including Oxford's unmet housing need) affordable housing, employment, transport, environment and heritage.
- 8 The Stage 3 hearing sessions took place in July 2017 and focused on the Local Plan's five sub-area strategies, in particular the proposed housing site allocations as well as five-year housing land supply. Proposed Main Modifications were discussed and considered as part of the examination hearing sessions and as a result of those discussions the Council agreed to commission further landscape and heritage evidence which were subject to public consultation from 22 November – 20 December 2017.
- 9 In January 2018, the Inspector wrote to the Council setting out his thoughts in relation to the Local Plan and concluding that subject to further modifications to the effect of those proposed by the Council, the plan as previously proposed to be modified is likely to be capable of being found legally-compliant and sound. Subsequent to this a series of Further Main

² <https://www.westoxon.gov.uk/media/1264894/document-library-live-local-plan-examination-.pdf>

Modifications (FMMs) were subject to public consultation from 22 February – 9 April 2018.

- 10 Further work then took place on the Council's Habitat Regulations Assessment (HRA) report in June 2018 and the Inspector's final report was published on 24 August 2018. The report concludes that the West Oxfordshire Local Plan 2031 provides an appropriate basis for the planning of the District, provided that a number of Main Modifications (MMs) are made to it.
- 11 In accordance with the Council's adopted Statement of Community Involvement (SCI), at each stage of the development of the Local Plan, formal and public consultation was undertaken to help ensure that stakeholders' views were taken into consideration in the next steps of plan preparation. Issues raised and responses prepared have been documented during the development of the Local Plan and published on the Council's website³.

How environmental & sustainability considerations have been integrated into the Local Plan; How the Sustainability/Environmental Report has been taken into account

- 12 During the plan-making process, SA (incorporating SEA) has been carried out as an iterative and ongoing process to inform decision making for the developing Local Plan. The SA was undertaken in accordance with government guidance⁴ which encourages a staged approach that integrates appraisal to consider the effects of the emerging plan on socio-economic as well as environmental factors. Since 2014, independent specialist consultants were appointed to carry out the SA for the Council. They worked closely with the plan-making team in an iterative way such that the findings and recommendations from the SA were integrated into each developing stage of the Local Plan.
- 13 The SA of the Local Plan used the same SA Framework developed during the SA scoping process as the basis for assessing the emerging Local Plan - and as explained in Section 2 of the submitted SA Report (February 2015). Relevant plans/programmes had been reviewed; baseline information regarding the character of the area and its likely evolution collated and analysed; and sustainability problems, issues and opportunities had been identified during the SA scoping to compile a Framework of Objectives and Sub-Objectives/Decision-Aiding Questions that seek to resolve the sustainability issues identified and relevant to the plan and the West Oxfordshire District area. The assessment used both quantitative and qualitative assessments, including defined thresholds of significance, where possible.
- 14 The SA considered the likely significant effects of the implementation of the Local Plan on the sustainability objectives for the West Oxfordshire District area. For each aspect of the Local Plan, the assessment against the SA

³ <https://www.westoxon.gov.uk/localplan2031>

⁴ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

Objectives was recorded with a narrative provided describing any significant effects identified, mitigation of any significant negative effects, and any suggestions for enhancing potential beneficial effects. In line with requirements of the SEA Regulations, the appraisal considered effects including short, medium and long term, permanent, and temporary, positive and negative, secondary, cumulative and synergistic, wherever possible and relevant. Any gaps or difficulties were also reported.

- 15 The findings and recommendations of the SA informed plan-making and were integrated into the further development of the Local Plan - and as set out in the Submitted SA Report (February 2015) and SA Addendum Reports (October 2016, October 2017, and February 2018) accompanying the Main Modifications and Further Main Modifications to the Local Plan. The plans/programmes review and baseline information was updated as necessary at each further stage.
- 16 The SA Reports recorded that, overall, the Local Plan would have positive effects on objectives for housing, employment, communities, health and accessibility, including for open space and green infrastructure, and promotion of sustainable transport. The mitigation provided by the Local Plan policies would address identified likely significant negative effects, together with directing new development site allocations to locations where possible negative effects could be avoided or mitigation, and potential positive effects could be enhanced. The SA identified the potential for residual minor long-term negative effects on landscape and heritage as a result of the increased housing requirement. Further specific studies identified mitigation measures, including refinement of development location, capacity and design.
- 17 Where relevant, the SA made recommendations, for example, as follows:
 - Consideration of the potential cumulative negative effects of development on landscape and visual amenity, and heritage assets and their settings
 - Opportunities for enhancing green infrastructure linkages and networks, including promoting sustainable transport
- 18 The Main Modifications and Further Main Modifications, to the Local Plan arising from the Examination and issues discussed at the Hearings were subject to SA, reported and subject to public consultation. Generally, the SA found that the changes proposed to the Local Plan strengthened the positive effects that had been identified, particularly for housing objectives. The proposed modifications strengthen and confirm implementation of mitigation measures, particularly through inclusion of site-specific development requirements, for example, with the proposed Oxfordshire Cotswolds Garden Village. This improved the overall sustainability of the Local Plan, including mitigating potential negative effects previously identified through the SA, especially regarding landscape/visual impacts, and effects on heritage assets and their settings.

- 19 The SA documents have been available on the Council's website and, at each stage, the responses to comments made and issues raised have been reported. Throughout the process, the appraisals have been proportionate and appropriate to the stages of plan-making. Thus, environmental and sustainability considerations have been integrated and the SA Reports taken into account throughout the plan-making process.

How the results of consultation have been taken into account

- 20 Consultation is an important aspect of SA and there was statutory and public consultation at each key stage of the Local Plan preparation and the SA as follows:

Local Plan Stage and Documents Consultation	SA/SEA Stage and Documents Consultation
Evidence gathering 2007	Draft SA Scoping Report Sent to statutory bodies and wider stakeholders for 5 weeks consultation from 23 March to 27 April 2007 Final SA Scoping Report July 2007
Issues and Options Consultation Document Public consultation March to May 2008	Updated SA Scoping Report February 2008 No changes to key sustainability issues or SA Framework therefore no further consultation
Core Strategy so far: Interim position statement. Public consultation 20 February to 6 April 2009	Updated SA Scoping Report December 2009 No changes to key sustainability issues or SA Framework therefore no further consultation
Core Strategy Preferred Approach Public consultation 5 February to 22 March 2010	Core Strategy Preferred Approach SA Report Public consultation 5 February to 22 March 2010
Draft Core Strategy Public consultation 24 January to 11 March 2011	Draft SA Report Public consultation 24 January to 11 March 2011
Draft Local Plan Public Consultation 07 November to 19 December 2012	Draft SA Report Public Consultation 07 November to 19 December 2012
Focussed Consultation Document Public Consultation 28 July to 8 September 2014	Focussed Consultation SA Report Public Consultation 28 July to 8 September 2014
Proposed Submission Local Plan 2031 27 March – 8 May 2015	SA plans & programmes review and baseline information updated Feb 2015 SA Report (Feb 2015) [CD2 & CD2a] 27 March – 8 May 2015
Local Plan 2031 Submitted to Planning Inspectorate on 14 July 2015 for independent examination.	SA Report (Feb 2015) submitted as supporting evidence to accompany the submission Local Plan 2031
Examination Part 1 (dealing with strategic matters, including duty to cooperate, housing & employment requirements)	Representations were also made on the SA at the Hearings

23 – 26 November 2015	
Suspension of Local Plan Examination in January 2016 to allow the Council to undertake further work in response to the Inspector's Preliminary Findings (December 2015)	SA plans & programmes review and baseline updated in September 2016
Proposed Main Modifications to Submitted Local Plan November-December 2016	SA Addendum Report October 2016 [CD10 & CD10a] Public consultation November – December 2016
Proposed Main Modifications submitted to Planning Inspectorate 10 March 2017	SA Addendum Report (October 2016) submitted as supporting evidence to support the proposed main modifications.
Examination Stage 2 Hearings 9-18 May 2017	Representations were also made on the SA at the Hearings
Examination Stage 3 Hearings 11-20 July 2017	Representations were also made on the SA at the Hearings
Initial proposed Further Main Modifications to Inspector September 2017	N/a
Additional landscape & heritage studies; note on housing and demography in the Burford – Charlbury sub-area Consultation 22 November-20 December 2017	SA Further Addendum Report (October 2017) including refreshed SA of strategic options Consultation 22 November-20 December 2017
Inspector's Letter 16 Jan 2018 Further Main Modifications (FMMs) Further Additional Modifications (FAMs) Public Consultation 22 February- 9 April 2018	SA Further Addendum Report (February 2018) Public Consultation 22 February- 9 April 2018
Inspector's final report to Council 24 August 2018 Adoption of Local Plan – September 2018	SA Adoption Statement September 2018

21 SA and consultation responses have been considered in an iterative and ongoing way throughout the plan-making process and in accordance with the requirements of the SEA Regulations. Representations have been recorded and the responses made to issues and concerns raised have been published, including at key statutory stages, as follows:

- SA Scoping Report July 2007 Updated February 2008 & December 2009 – Section 7.4 lists consultation representations and responses made
- Appendix VII of Pre-Submission/Submission SA Report (February 2015) summarises responses to consultation
- Appendix I of the SA Further Addendum Report (October 2016) summarises consultation representations and the Council's responses including those made on the Pre-Submission SA and at Examination (2015)

- Appendix A of the Further SA Addendum Report (October 2017) reports the comments received to the SA Addendum Report (October 2016) and the Council's responses
- Table 2.1 of the Further SA Addendum Report (February 2018) reports the comments received to the SA Addendum Report (October 2017) and the Council's responses

22 All consultation representations and responses are available on the Council's website under the Local Plan 2031⁵.

Reasons for choosing the Local Plan as adopted, in the light of other reasonable alternatives

23 The SEA Regulations require assessment of the likely significant effects of implementing the plan and "*reasonable alternatives*" taking into account the objectives and geographical scope of the plan; and the reasons for selecting alternatives should be outlined in the Report. The Government's planning practice guidance⁶ states that 'reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable'.

24 At each stage of the development of the Local Plan, all options and any reasonable alternatives to policy and site allocation proposals have been considered and assessed. Options for the level of growth and spatial distribution were considered at the Issues & Options stage in 2008. A distinct preference was expressed by respondents for the 'Three Towns' option (i.e. most development to be concentrated at Witney, Carterton and Chipping Norton). These three reasonable options for the distribution of growth were considered through the SA process (2010), as follows:

- 'Witney Focus': Concentrate development at Witney
- 'Three Towns': Concentrate development at Witney, Carterton and Chipping Norton with a limited amount of dispersal across the District
- 'Dispersal': More dispersed development amongst a variety of towns and villages but still including development in Witney, Carterton and Chipping Norton

25 These three strategic approaches were subject to refreshed and subject to independent SA in 2015. At that time, the previously rejected 'New Village' and 'Transport Corridor' options were still not considered reasonable alternatives for the following reasons:

- A New village/ settlement is not considered a reasonable alternative as there are no available or suitable sites to accommodate the

⁵ <https://www.westoxon.gov.uk/localplan2031>

⁶ <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>

number of dwellings needed to provide the infrastructure necessary for a new settlement.

- Concentrating development along transport corridors is not considered a reasonable alternative given existing constraints, particularly AONB, landscape, and capacity of the existing road network.

- 26 The Submitted Local Plan 2031 was considered at the first hearing sessions of the examination held 23 – 26 November 2015. These dealt with strategic matters, including the duty to cooperate, and housing and employment requirements. The Inspector's preliminary findings indicated that the Local Plan's housing requirement of 10,500 dwellings was too low; the evidence to support its housing requirement had been worked-up independently of its partners in the rest of the Housing Market Area (HMA). The Examination was subsequently suspended in January 2016 to allow the Council to undertake further work including the identification of additional sites.
- 27 As set out in his preliminary findings, the Inspector considered at the time that the SA report (2015) had adequately addressed reasonable alternatives for a plan seeking only to address the needs of West Oxfordshire. However, he highlighted that if any further work anticipated some apportionment of Oxford's needs to West Oxfordshire, then the range of alternative strategies to be considered in the SA would need to be reviewed.
- 28 Therefore, the SA Addendum Report (October 2016) considered the implications of the uplift in housing with new and refreshed assessment of strategic options and site allocation options, building upon the previous SA work and addressing issues raised and discussed at the examination. The SA Addendum Report (2016) included consideration of alternatives again, as follows:
- the implications of the uplift for the strategic options (spatial/settlement strategy; levels of housing & employment growth; directions of growth) and refresh or carry out new SA as appropriate
 - consider the options for allocating additional development and refresh or carry out new SA as appropriate
- 29 As the further work on uplifting housing numbers was undertaken and included some apportionment of Oxford's needs to West Oxfordshire, the SA considered two alternative spatial strategy options (new village and concentration along transport corridors) that had not been progressed beyond the Issues & Options stage of plan-making in 2008. Therefore, the high-level SA of the 5 strategic options for the Spatial Strategy was refreshed. This approach also addressed some of the representations made on the Submission SA and at the hearing sessions. The Spatial Strategy options considered through the SA Addendum Report (2016) were as follows:
- Option 1 Witney Focus
 - Option 2 Three Towns Focus – Witney, Carterton, Chipping Norton
 - Option 3 Dispersed but still including development at the 3 Towns

- Option 4 Concentration along transport corridors including expansion of existing settlements and/or new villages
 - Option 5 A New Village
- 30 In consideration of the uplift in housing numbers, the SA of strategic options for housing growth was revisited and the SA tested strategic options, as follows:
- 568 dpa – the OAN in the partial SHMA update⁷ (2016), although it is acknowledged that an uplift on this would be needed to meet with affordable housing need
 - 635 dpa – the lower end of the range in the SHMA (2014) (635–685)
 - 660 dpa – the mid-point of the range (635-685)
 - 685 dpa – the top end of the range in the SHMA (2014) (635-685) & intended to meet affordable housing in full
 - 800 dpa – the mid-point of the SHMA plus additional provision to take account of unmet housing need from Oxford City
- 31 Directions of growth at Witney, Carterton, Chipping Norton, and Eynsham were refreshed through SA and some new site options were also tested through SA. Two new strategic options for potential growth were identified. These were tested through SA with the full SA Framework as follows:
- A new Garden Village to the north of Eynsham
 - Urban Extension to the west of Eynsham
- 32 The reasons for selection or rejection of strategic options are described in Section 4 of the Pre-Submission/Submission SA Report (February 2015). The reasons for selection or rejection of strategic options – refreshed and renewed SA – is further described in Section 4 of the SA Addendum Report (October 2016). The reasoning for continuing to progress strategic allocations after refreshing the SA is explained in Section 3 of the SA Further Addendum Report (October 2017).
- 33 Additional smaller 'non-strategic' site options were identified to help meet with the uplift in housing numbers. Whilst a number of other sites were considered through the Council's SHELAA process, most were found to be unsuitable. Of the remaining SHELAA sites, the 15 proposed non-strategic site allocations were identified as best aligning with the Spatial Strategy and being the most sustainable, such that the others were not progressed. The reasons for progression or rejection of non-strategic sites is discussed in Section 4 of the SA Report (October 2016). Further studies were subsequently undertaken in respect of landscape and heritage to inform decision-making following the Stage 3 Examination hearing sessions in July 2017. The SA was refreshed again and reasoning for progression of the proposed non-strategic site options was clearly explained in Section 7 of the SA Further Addendum Report (October 2017).

⁷ <http://www.westoxon.gov.uk/media/1448178/W-Oxon-revised-15-July-2016.pdf>

- 34 The 'do-nothing' scenario is not an option for a Local Plan as councils are required to provide for their identified development needs; however, this was considered by the SA process and the SA reported that significant negative effects on environmental factors were likely without a plan and that positive effects for socio-economic factors were less likely to be implemented.
- 35 Overall, the reasons for choosing the Local Plan as adopted include that the adopted Local Plan progresses the overall Vision, Objectives and Spatial Strategy for high quality development in West Oxfordshire meeting identified needs for housing and employment whilst avoiding significant change to the intrinsic character of the District and securing the most benefits and the least negative effects for sustainable development.

Measures that are to be taken to monitor the significant sustainability/ environmental effects of the implementation of the Local Plan

- 36 The SEA Regulations require that the significant environmental effects of implementing the plan should be monitored with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action. Local Planning Authorities are required to produce Monitoring Reports⁸ on the progress of Local Plans. The Local Plan Delivery and Monitoring Framework (see Appendix 3 of the Local Plan 2031) includes a wide range of indicators that also relate to the SA Framework. It is considered that these indicators will be sufficient to identify any unforeseen adverse effects at an early stage and provide information on the predicted effects from the SA.
- 37 Upon adoption of the Local Plan the Delivery and Monitoring Framework will be used as the basis for future annual monitoring by the Council and incorporated into the Council's Monitoring Report available to view on the Council's website.

⁸ WODC Annual Monitoring Reports available at: <https://www.westoxon.gov.uk/residents/planning-building/local-development-framework/>