



# Technical note:

## South Oxfordshire Local Plan Sustainability Appraisal

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### 1. Introduction

- 1.1.1 South Oxfordshire District Council (the Council) has appointed Amec Foster Wheeler Environment and Infrastructure UK Ltd (Amec Foster Wheeler) to provide assistance with the Sustainability Appraisal (SA), incorporating Strategic Environmental Assessment (SEA), of its Local Plan.
- 1.1.2 The SA Report and Appendices to accompany the Publication version of the Local Plan were provided to the Council on 12<sup>th</sup> September. Following meetings of the Scrutiny Committee and Cabinet to consider the plan and supporting documentation, further amendments have been made and proposed in a resolution (dated 21<sup>st</sup> September). The purpose of this Technical Note is to consider the implications for the SA of the proposed amendments and to provide further appraisal (as necessary) to ensure that all policies in the Publication version of the Local Plan have been subject to SA/SEA.
- 1.1.3 In summary the changes proposed are:
- ▶ An update to Policy DES8 'Efficient use of resources' – with additional text added in relation to higher quality and higher density development which minimises land take. Amendments are also proposed to the supporting text around the optimisation of density and the need to take into account townscape character and a range of other factors, including the character and appearance of Conservation Areas and the Areas of Outstanding Natural Beauty;
  - ▶ A new policy on the Green Belt, STRAT11. This includes removal of land from the Green Belt at Wheatley
  - ▶ The self build target in Policy H12 is increased from 2% to 3%.
  - ▶ Changes to supporting text in relation to planning for larger villages and the potential of development being delivered on land adjacent the Culham Science Centre in advance of the planned transport infrastructure.
- 1.1.4 This note also provides an update in relation to the Habitats Regulations Assessment and how that should be referenced in the SA.

### 2. Implications of the proposed changes for the SA

- 2.1.1 The proposed changes and their implications for the SA are discussed below.

#### 2.2 The Proposed Amendment to Policy DES8

- 2.2.1 Policy DES8 is appraised in Appendix P of the SA Report. The proposed amendment would improve the performance of the policy against SA objective 8, which relates to improving the efficiency of land use. The current SA records no relationship between the Policy and this objective. If the change is made this should be amended to a significant positive effect on the basis that the amendment would help optimise density on sites. The policy has included mitigation

through reference in the supporting text to the provision of “overriding reasons concerning townscape, character, landscape, design or infrastructure capacity”. This would also be acknowledged in the main report (section 8.3 of the main report discusses likely significant effects associated with the policies). A minor positive effect would also be identified in relation to SA Objective 9 relating to ‘built heritage’ as the supporting text to the policy highlights the need to take into account townscape character and Conservation Areas. No other changes to the SA matrix are considered necessary. No changes to the policy are suggested as a result of the SA.

## 2.3 New Policy on the Green Belt STRAT11

- 2.3.1 This policy reflects the National Planning Policy Framework in respect of the protection of the Green Belt. It also proposes a change to the Green Belt at Wheatley to support the village and the ambitions for growth contained in their Neighbourhood Development Plan (NDP). Development proposals for Wheatley would need to be in accordance with the policies and provision of the Wheatley NDP. The new policy STRAT11, including the proposed amendment to the boundary at Wheatley, has been appraised against the SA objectives (Table 2.1) and, if the change is made to the policy, the matrix for the STRAT policies at Appendix P of the SA Report would be updated to include the appraisal.
- 2.3.2 The inclusion of a general policy in relation to the Green Belt is anticipated to have a range of potential significant positive effects, for example in relation to SA objective 8 relating to land use as it would help to conserve the district’s open spaces and countryside. It could also contribute to a significant positive effect in relation to SA objective 9 relating to built heritage, e.g. by helping to protect the setting of heritage features within the Green Belt. Retaining land in the Green Belt could have a role in maintaining the flood plain and permeable surfaces within the district and a significant positive effect is therefore identified for SA objective 11 (flood risk).
- 2.3.3 Uncertain effects are identified in relation to a range of other objectives on the basis that any development in the Green Belt that requires planning permission may need to demonstrate very special circumstances.
- 2.3.4 The proposal to amend the Green Belt by releasing land at Wheatley has a range of significant effects, both positive and negative. It could lead to positive effects associated with the provision of housing (SA objective 1) but the scale of provision is uncertain at this stage. Wheatley has a range of existing services that new development could utilise so the potential for significant positive effects are identified for SA objectives 4 (health) and 6 (travel choice). It could lead to the loss of greenfield land but also result in the redevelopment of previously developed land, so a mixed score is identified for SA objective 8 relating to land use.
- 2.3.5 The potential for significant negative effects are identified for SA objective 11 (flood risk) because the area that is proposed to be included in the revised inset for Wheatley includes land in Flood Zone 3.

## Mitigation

- 2.3.6 It is suggested that the policy could be amended to reflect the NPPF (paragraph 81), i.e. to identify opportunities for beneficial use of the Green Belt:
- 2.3.7 *“Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.”*
- 2.3.8 With regard to flood risk at Wheatley, Policies DES1 ‘Delivering High Quality Development,’ DES4 ‘Masterplans for Allocated Sites and Major Developments’ and DES8 ‘Promoting Sustainable Design’ would mitigate the likelihood of flooding through requiring developments to be well designed and resilient to the effects of climate change and reduce risk of surface water flooding (1 in 30 year extent). It is also assumed that any proposals coming through the NDP would need to address these issues and would also be assessed through the SA of the NDP.

## 2.4 Policy H12 Self Build and Custom Build Housing

- 2.4.1 As noted above the self build target in Policy H12 is proposed to be increased from 2% to 3% in order to promote this as a route to home ownership.
- 2.4.2 Policy H12 is assessed in Appendix P of the SA. Given the strategic nature of the SA objectives it is not considered that amending the target from 2% to 3% would impact on the results of the SA of the policy. Nor would it affect any of the significant differences identified for the two policy alternatives. The SA Report will be updated to acknowledge this amendment.

## 2.5 Changes to Supporting Text

- 2.5.1 The proposed changes to supporting text in relation to planning for larger villages and the potential of development being delivered on land adjacent the Culham Science Centre in advance of the planned transport infrastructure are not considered to impact on the SA.

## 2.6 Habitats Regulations Assessment

- 2.6.1 The HRA of the South Oxfordshire Submission Local Plan (September 2017) has been undertaken by Land Use Consultants. The SA Report needs to be updated to include reference to the report as it must also consider the potential for likely significant effects in relation to European designated sites.
- 2.6.2 Although the HRA has concluded that the Local Plan alone will not have a significant air pollution impact, at this stage it has not been possible to conclude the Appropriate Assessment of air pollution impacts arising from the Local Plan in combination with other plans or projects. These impacts relate to potential increases in traffic on the following roads within 200 metres of sensitive European sites:
- ▶ M40: Aston Rowant SAC;
  - ▶ A355: Burnham Beeches SAC;
  - ▶ A404 & A4010: Chilterns Beechwoods SAC; and
  - ▶ A332 & A329: Windsor Forest & Great Park SAC.
- 2.6.3 Conclusion of the assessment requires guidance from Natural England, which is currently being updated following the recent Wealden Judgement. It is expected that Natural England's advice will be received during the forthcoming consultation period. LUC will therefore aim to make use of the consultation period by liaising with Natural England in order to reach an agreement on the assessment before the Local Plan is submitted to the Planning Inspectorate.
- 2.6.4 The SA, including the potential for consideration of cumulative effects needs to be updated to reflect this conclusion and the outcome of subsequent discussions with Natural England.



Table 2.1: Appraisal of Policy Strat11: Green Belt

SA Objective	Commentary	STRAT11
<p>1. To help to provide existing and future residents with the opportunity to live in a decent home and in a decent environment supported by appropriate levels of infrastructure.</p>	<p><b><u>Likely Significant Effects</u></b></p> <p>The policy seeks to ensure that the Green Belt for South Oxfordshire continues to serve its key functions. It will be protected from harmful development. Within its boundaries, development will be restricted to those limited types of development which are deemed appropriate by the NPPF, unless very special circumstances can be demonstrated. In consequence, proposals for residential development within the Green Belt would be determined in accordance with the NPPF and STRAT11. It supports the objective, through contributing to a 'decent environment' for residents to live in.</p> <p>Amending the green belt boundary at Wheatley could contribute towards the achievement of this objective but the scale is uncertain as development will come through the NDP.</p> <p><b><u>Mitigation</u></b></p> <p>None identified.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	<p>✓/?</p>
<p>2. To help to create safe places for people to use and for businesses to operate, to reduce anti-social behaviour and reduce crime and the fear of crime.</p>	<p><b><u>Likely Significant Effects</u></b></p> <p>The policy seeks to ensure that the Green Belt for South Oxfordshire continues to serve its key functions. This aspect of the policy will not have an effect on this objective.</p> <p>New housing development in Wheatley identified in the NDP could potentially contribute to this objective, e.g. by ensuring that they are consistent with paragraph 58 of the National Planning Policy Framework and 'create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.'</p> <p><b><u>Mitigation</u></b></p> <p>None identified.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p>	<p>✓</p>



SA Objective	Commentary	STRAT11
	None identified.	
3. To improve accessibility for everyone to health, education, recreation, cultural, and community facilities and services.	<p><b><u>Likely Significant Effects</u></b></p> <p>The policy seeks to ensure that the Green Belt for South Oxfordshire continues to serve its key functions. Proposals for new facilities within the Green Belt would be determined in accordance with the NPPF and STRAT11. This aspect of the policy will not have an effect on this objective.</p> <p>Amending the green belt boundary at Wheatley could contribute towards the achievement of this objective but the scale and nature of development is uncertain as development will come through the NDP.</p> <p><b><u>Mitigation</u></b></p> <p>None identified.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	✓/?
4. To maintain and improve people's health, well-being, and community cohesion and support voluntary, community, and faith groups.	<p><b><u>Likely Significant Effects</u></b></p> <p>The policy seeks to ensure that the Green Belt for South Oxfordshire continues to serve its key functions. Proposals for new facilities within the Green Belt would be determined in accordance with the NPPF and STRAT11. This aspect of the policy will not have an effect on this objective.</p> <p>Amending the green belt boundary at Wheatley could contribute towards the achievement of this objective as development would benefit from proximity to existing GP facilities within Wheatley. There is also potential for provision of open space within the area taken out of the Green Belt, although any proposals would come through the NDP.</p> <p><b><u>Mitigation</u></b></p> <p>None identified.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p>	✓✓/?



SA Objective	Commentary	STRAT11
	None identified.	
5. To reduce harm to the environment by seeking to minimise pollution of all kinds especially water, air, soil and noise pollution.	<p><b><u>Likely Significant Effects</u></b></p> <p>The policy seeks to ensure that the Green Belt for South Oxfordshire continues to serve its key functions. Proposals for new facilities within the Green Belt would be determined in accordance with the NPPF and STRAT11. Restricting development in the Green Belt will contribute towards this objective as it will minimise sources of pollution associated with development within the natural environment.</p> <p>The area proposed to be taken out of the Green Belt at Wheatley is adjacent to an operational sewage treatment works so any proposals would need to take account of potential impacts associated with odour.</p> <p><b><u>Mitigation</u></b></p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	<p>✓✓/?</p>
6. To improve travel choice and accessibility, reduce the need to travel by car and shorten the length and duration of journeys.	<p><b><u>Likely Significant Effects</u></b></p> <p>The policy seeks to ensure that the Green Belt for South Oxfordshire continues to serve its key functions. Any proposals that would provide transport choice within the Green Belt, would be determined in accordance with the NPPF and STRAT11. This aspect of the policy will not have an effect on this objective.</p> <p>There are a range of facilities in Wheatley that development within the area that is proposed to be inset from the Green Belt would have access to, including GP surgeries, a Primary School, Secondary School, post office and supermarket.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	<p>✓✓/?</p>
7. To conserve and enhance biodiversity	<p><b><u>Likely Significant Effects</u></b></p>	<p>✓✓/-</p>



SA Objective	Commentary	STRAT11
	<p>The policy seeks to ensure that the Green Belt for South Oxfordshire continues to serve its key functions. The restriction of development in the Green Belt will help protect existing biodiversity and a significant positive effect is identified on that basis.</p> <p>The proposal to amend the Green Belt by releasing land at Wheatley could lead to the loss of greenfield land with the potential for associated effects on the natural environment and biodiversity. However, the land at Wheatley Campus is not within 800m of a locally or nationally designated site, so any effects would be minor. The SA for the NDP would need to consider potential effects on biodiversity once site specific proposals are identified.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>Policies ENV2 and ENV3 provide the basis for avoiding, mitigating or compensating for potential effects on biodiversity.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	
<p>8. To improve efficiency in land use and to conserve and enhance the district's open spaces and countryside in particular, those areas designated for their landscape importance, minerals, biodiversity and soil quality.</p>	<p><b><u>Likely Significant Effects</u></b></p> <p>The policy seeks to ensure that the Green Belt for South Oxfordshire continues to serve its key functions. It will be protected from harmful development. Within its boundaries, development will be restricted to those limited types of development which are deemed appropriate by the NPPF, unless very special circumstances can be demonstrated. In consequence, proposals for development within the Green Belt would be determined in accordance with the NPPF and STRAT11 and there is potential for a significant positive effect in relation to this policy .</p> <p>Removing land from the Green Belt at Wheatley could result in the loss of greenfield land but could also potentially involve the re-use of previously developed land and buildings as the area to be inset includes existing employment areas. A mixed significant positive and negative score is therefore identified on this basis.</p> <p><b><u>Mitigation</u></b></p> <p>None identified.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	✓✓/xx
<p>9. To conserve and enhance the district's historic environment including archaeological resources</p>	<p><b><u>Likely Significant Effects</u></b></p>	✓✓/?



SA Objective	Commentary	STRAT11
and to ensure that new development is of a high quality design and reinforces local distinctiveness.	<p>The policy seeks to ensure that the Green Belt for South Oxfordshire continues to serve its key functions. It will be protected from harmful development. It could help make a significant contribution towards this objective, e.g. by protecting the setting of heritage features within the Green Belt.</p> <p>An uncertain effect is recorded in relation to the proposal to inset land from the Green Belt at Wheatley as this site is within 500m of Listed Buildings. The SA for the NDP would need to consider the potential for effects in relation to built heritage.</p> <p><b><u>Mitigation</u></b></p> <p>None identified.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	
10. To seek to address the causes and effects of climate change	<p><b><u>Likely Significant Effects</u></b></p> <p>The policy seeks to ensure that the Green Belt for South Oxfordshire continues to serve its key functions. It will be protected from harmful development. Within its boundaries, development will be restricted to those limited types of development which are deemed appropriate by the NPPF, unless very special circumstances can be demonstrated. Proposed renewable energy related developments in the Green Belt would need to demonstrate very special circumstances. The protection of open spaces created within the Green Belt could provide temporary storage for flood waters arising from increased in the frequency and severity of surface water flooding associated with climate change.</p> <p>A minor positive effect is identified in relation to the proposal to inset land at Wheatley as there would be potential for greenhouse gas emissions associated with the development of this site to be reduced and for renewable energy to be incorporated which will have a positive effect on this objective.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	✓



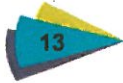


SA Objective	Commentary	STRAT11
11. To reduce the risk of, and damage from, flooding.	<p><b><u>Likely Significant Effects</u></b></p> <p>Retaining land in the Green Belt could have a role in maintaining flood plain and permeable surface within the district. This is assessed as a significant positive effect against this objective.</p> <p>The land that is proposed to be inset from the Green Belt at Wheatley is within Flood Zone 3 and includes land at risk of surface water flooding (1 in 100 years). This is assessed as a significant negative effect against this objective.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>Policies DES1 'Delivering High Quality Development,' DES4 'Masterplans for Allocated Sites and Major Developments' and DES8 'Promoting Sustainable Design' would mitigate the likelihood of flooding through requiring developments to be well designed and resilient to the effects of climate change and reduce risk of surface water flooding (1 in 30 year extent). Any proposals coming through the NDP would need to address these issues and would also be assessed through the SA of the NDP.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	✓✓ / x x
12. To seek to minimise waste generation and encourage the reuse of waste through recycling, compost, or energy recovery.	<p><b><u>Likely Significant Effects</u></b></p> <p>The policy seeks to ensure that the Green Belt for South Oxfordshire continues to serve its key functions. It will be protected from harmful development. Within its boundaries, development will be restricted to those limited types of development which are deemed appropriate by the NPPF, unless very special circumstances can be demonstrated. Any proposals for waste related development in the Green Belt that required planning permission would be determined in accordance with the NPPF and STRAT11. As very special circumstances may need to be identified, an uncertain effect is identified.</p> <p>Removing land from the Green Belt at Wheatley could result in localised development occurring. This could lead to an increase in waste production in the district, although will be subject to the operation of other plan policies.</p> <p><b><u>Mitigation</u></b></p> <p>None identified</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p>	?/x

SA Objective	Commentary	STRAT11
	None identified.	
<p>13. To assist in the development of:</p> <ul style="list-style-type: none"> <li>a) high and stable levels of employment and facilitating inward investment;</li> <li>b) a strong, innovative and knowledge-based economy that deliver high-value-added, sustainable, low-effect activities;</li> <li>c) small firms, particularly those that maintain and enhance the rural economy; and</li> <li>d) thriving economies in our towns and villages.</li> </ul>	<p><b><u>Likely Significant Effects</u></b></p> <p>The policy seeks to ensure that the Green Belt for South Oxfordshire continues to serve its key functions. It will be protected from harmful development. Within its boundaries, development will be restricted to those limited types of development which are deemed appropriate by the NPPF, unless very special circumstances can be demonstrated. As very special circumstances may need to be identified in order that any development that would contribute to this objective would be permitted, an uncertain effect is identified.</p> <p>Insetting land from the Green Belt at Wheatley in anticipation of development occurring could result in the provision of land for employment (one of the options considered in the emerging NDP). A minor positive effect is identified on this basis but the SA for the NDP will need to appraise the effects of any proposal once the scale of employment provision is confirmed.</p> <p><b><u>Mitigation</u></b></p> <p>None identified.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	<p>?/✓</p>
<p>14. To support the development of Science Vale as an internationally recognised innovation and enterprise zone</p>	<p><b><u>Likely Significant Effects</u></b></p> <p>Part of the Science Vale area lies within the Green Belt. An uncertain effect is therefore identified as any development requiring planning permission within this part of the Green Belt would need to demonstrate very special circumstances.</p> <p>Wheatley is outside of the Science Vale area and will not therefore contribute towards this objective.</p> <p><b><u>Mitigation</u></b></p> <p>None identified.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	<p>?/0</p>

SA Objective	Commentary	STRAT11
<p>15. To assist in the development of a skilled workforce to support the long term competitiveness of the district by raising education achievement levels and encouraging the development of the skills needed for everyone to find and remain in work.</p>	<p><b><u>Likely Significant Effects</u></b></p> <p>The policy seeks to ensure that the Green Belt for South Oxfordshire continues to serve its key functions. It will be protected from harmful development. Within its boundaries, development will be restricted to those limited types of development which are deemed appropriate by the NPPF, unless very special circumstances can be demonstrated. As very special circumstances may need to be identified in order that any development that would contribute to this objective would be permitted, an uncertain effect is identified.</p> <p>Wheatley has Primary Schools and a Secondary School so no effects are anticipated in relation to impact on education facilities associated with the inseting of land from the Green Belt at Wheatley. The SA for the NDP would need to consider any effects once options for the scale and location of housing has been established.</p> <p><b><u>Mitigation</u></b></p> <p>None required.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p> <p>None identified.</p>	<p>?/0</p>
<p>16. To encourage the development of a buoyant, sustainable tourism sector.</p>	<p><b><u>Likely Significant Effects</u></b></p> <p>The policy seeks to ensure that the Green Belt for South Oxfordshire continues to serve its key functions. It will be protected from harmful development. Within its boundaries, development will be restricted to those limited types of development which are deemed appropriate. The policy would have a role in protecting the countryside from development and hence help maintain the district's attractiveness as a place to visit, however any proposals for tourism related facilities in the Green Belt that require planning permission would need to demonstrate very special circumstances, hence uncertainties are also identified.</p> <p>Inseting land from the Green Belt at Wheatley is not anticipated to impact on this objective.</p> <p><b><u>Mitigation</u></b></p> <p>None identified.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p> <p><b><u>Uncertainties</u></b></p>	<p>✓✓/?</p>

SA Objective	Commentary	STRAT11
	None identified.	
17. Support community involvement in decisions affecting them and enable communities to provide local services and solutions.	<p><b><u>Likely Significant Effects</u></b></p> <p>The policy seeks to ensure that the Green Belt for South Oxfordshire continues to serve its key functions. This aspect of the policy will not have an effect on this objective.</p> <p>Insetting land from the Green Belt at Wheatley will enable the local community to plan positively for the area taken out of the Green Belt and a significant positive effect is identified in relation to this objective.</p> <p><b><u>Mitigation</u></b></p> <p>None identified.</p> <p><b><u>Assumptions</u></b></p> <p>None identified.</p>	✓✓



Author

Sean Nicholson

Reviewer

Pete Davis

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