

Appendix A Table 15 Combined Consultation Responses received for SA Refined Options 2015 and SA Preferred Options 1 2016

Consultation Comments received for the Sustainability Appraisal PO1 June 2016		
Consultee	Response	SODC Response
Historic England	We note that the Sustainability Appraisal identifies significant negative effects in respect of the historic environment if development was to take place at Chalgrove Airfield without mitigation. We agree that development would cause significant negative effects, which may still be the case even with mitigation. Any significant development on this part of the former airfield would be likely to amount to substantial harm to the Battlefield. Registered Battlefields are considered by the National Planning Policy Framework to be heritage assets of the highest significance, substantial harm to which should be wholly exceptional (paragraph 132). Historic England is therefore strongly opposed to the inclusion of part of the Registered Battlefield within the indicated settlement site.	The following information has been documented within the SA mitigation for Chalgrove: Historic England recommend the following: •Oxfordshire Historic Landscape Characterisation should be used to inform the layout of any new settlement, •This assessment may require more than a desk-based assessment and evaluation and should consider both above and below-ground features and remains.
Historic England	Planning Policy Framework, the Oxfordshire Historic Landscape Characterisation should be used to inform the layout of the any new settlement (contact Oxfordshire County Council for more information on the HLC).	Mitigation added to all strategic sites: Historic England recommend the Oxfordshire Historic Landscape Characterisation should be used to inform the layout of any new settlement.
Historic England	As we explain above, we note that the Sustainability Appraisal identifies significant negative effects in respect of the historic environment if development was to take place at Chalgrove Airfield without mitigation. We agree that development would cause significant negative effects, which may still be the case even with mitigation. Historic England therefore considers that a detailed	Mitigation added to SA: This assessment may require more than a desk-based assessment and evaluation and should consider both above and below-ground features and remains.

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	<p>assessment of the potential impacts of a new settlement on the significance of the Registered Battlefield and of the airfield needs to be undertaken to determine whether the principle of a new settlement on the Chalgrove Airfield is acceptable and, if so, the form that settlement should take to avoid or minimise harm to the significance of the Battlefield and airfield before this proposal is taken any further.</p> <p>This assessment may require more than a desk-based assessment and evaluation and should consider both above and below-ground features and remains. Without that further detailed assessment, Historic England objects to this proposal.</p>	
Historic England	<p>Paragraphs 5.44 or 5.45 should recognise that the Wheatley Campus contains a scheduled monument – the moated site 580m south west of Church Farm. Scheduled monuments are considered by the National Planning Policy Framework to be heritage assets of the highest significance, harm to which should be exceptional and substantial harm to which should be wholly exceptional (paragraph 132). Any redevelopment of the campus should therefore retain the scheduled monument and respect its setting.</p>	Mitigation has been added to the SA of Wheatley Campus
Historic England	<p>Consideration will also need to be given the setting of the scheduled monument of the moated site of Holton House and its associated ice house, the grade II listed Holton Park and six other listed structures, all just to the north-west of the campus - paragraphs 129 and 132 of the National Planning Policy Framework recognise that the significance of a heritage asset can be harmed or lost by development within its setting.</p>	Mitigation has been added to the SA of Wheatley Campus
Historic England	<p>We note that the Sustainability Appraisal identifies potential negative impacts on the historic and archaeological environment from the preferred strategy and recommends that historic and archaeological environment constraints should be identified during the site selection process and towns and villages should be excluded where additional housing would lead to an adverse</p>	Agree

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	impact on the historic environment. We agree with that recommendation.	
Historic England	<p>Not entirely – the proposed approach should recognise that the Wheatley Campus contains a scheduled monument – the moated site 580m south west of Church Farm. Scheduled monuments are considered by the National Planning Policy Framework to be heritage assets of the highest significance, harm to which should be exceptional and substantial harm to which should be wholly exceptional (paragraph 132). Any redevelopment of the campus should therefore retain the scheduled monument and respect its setting. Consideration will also need to be given the setting of the scheduled monument of the moated site of Holton House and its associated ice house, the grade II listed Holton Park and six other listed structures, all just to the north-west of the campus - paragraphs 129 and 132 of the National Planning Policy Framework recognise that the significance of a heritage asset can be harmed or lost by development within its setting.</p>	Mitigation has been added to the SA of Wheatley Campus
Historic England	<p>As regards the proposed policies on the amount and distribution of B class jobs and Culham Science Centre and No.1 site, Culham Science Centre is, as noted in paragraph 6.22, the leading UK centre for fusion research and technology and is of international importance.</p> <p>The present site was planned and built as a whole and the layout also successfully retained the ghost of the wartime airfield. We would prefer to see any redevelopment and intensification at the CSC essentially retain this layout and open character of the airfield and later research centre.</p> <p>If wholesale demolition of the existing buildings is proposed we consider that a more detailed evaluation of the buildings should be undertaken to ascertain their significance. For example, the JET (Joint European Torus) facility was the world's largest fusion</p>	<p>Comments received have been integrated into the SA matrices for Culham.</p> <p>Mitigation includes: continue to consult Historic England to inform the masterplan development.</p>

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	<p>research machine. Ideally this evaluation should form part of a heritage strategy for the site as has been elsewhere with some success, for example, Dounreay. Buildings proposed for demolition should be recorded before demolition and selected drawings retained. We would like to see more than a basic photographic record – for example a film would be an excellent record, especially if the scientists and their equipment could be recorded at work.</p> <p>This may be something with which Historic England could assist. In addition, any development on the No.1 site should have regard to the setting of the grade II* listed Culham Station and grade II listed Culham overbridge, which lie just outside the boundary of the site to the south-west - paragraphs 129 and 132 of the National Planning Policy Framework recognise that the significance of a heritage asset can be harmed or lost by development within its setting.</p>	
Historic England	<p>According to our records, there are no designated heritage assets in Berinsfield. However, a brief review of the Oxfordshire Historic Environment Record indicates that Berinsfield lies within an area of high archaeological potential – the Thames gravels in the locality is an unusually rich area for the preservation of sites of pre-historic, Roman and Anglo-Saxon archaeology. Previously-recorded remains include the course of the Dorchester to Bicester Roman road, evidence of Roman pottery manufacturing and Iron Age and earlier Prehistoric remains including the surviving parts of the Dorchester cursus monument. Accordingly, the proposed feasibility study and masterplan for the regeneration of Berinsfield should take full and proper account of the potential archaeological interest of the parish, some of which may be of national importance. Reference should also be made to the Oxfordshire Historic Landscape Characterisation, details of which are available from Oxfordshire County Council.</p>	Information documented within the assessment of Policy New Housing & Regeneration in Berinsfield

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Natural England	Chalgrove Airfield does not appear to be subject to any major constraints relating to Natural England's remit. However, we were unable to find any landscape capacity assessments of the two options. Although the Sustainability Appraisal provides some basic information as to the likely landscape effects of these two options, we would normally expect a more detailed landscape assessment to inform the option selection process and advise that both sites are assessed both to inform the selection process and to guide the development specifications in the local plan for the site chosen. Chalgrove Airfield site does not appear well connected to the wider countryside and as such we suggest that the development specifications for the site include significant elements of greenspace and linkages to the wider countryside.	LCA to be carried out for Chalgrove Airfield.
Natural England	Should you reconsider your choice of preferred option, before the Harrington site could be chosen, we would need to be satisfied that the proposals would not adversely affect Spartum Fen SSSI . There appear to be considerable hydrological issues that could affect delivery of this site.	SA makes reference to Spartum Fen SSSI. N.E consultation response has be added to the mitigation.

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Reading Borough Council	Proposed Policy Housing Provision SODC propose to plan for 750 homes per annum, which represents the need for new housing after planned employment growth is taken into account. However, the Oxfordshire SHMA went a step further after considering economic growth, and looked at whether there is a case to adjust need upwards to make a greater contribution to meeting affordable housing needs. It considered that there was a case to be made for an upward adjustment in South Oxfordshire. The range specified was 725 to 825 homes per annum, with the higher end of the range representing enhanced delivery of affordable housing. The mid-point of that range is 775 per annum rather than 750. It is not fully clear to us on what basis SODC considers 750 a more appropriate number to plan for than 775 or even 825. The Sustainability Appraisal assesses the 825 homes per annum option and finds slightly more negative effects for this than for 750, but there is no summary that we could find within the SA or the Preferred Options as to how these considerations have been weighed. The 775 option does not seem to have been assessed. We are concerned that the full range of options for meeting South Oxfordshire's own need have not been assessed, and there may be implications in terms of putting pressure on the already strained housing market in neighbouring authorities.	The SA has been updated to reflect these comments.
Mr Sharf	'Minimising' carbon emissions is not a sound policy. Without any targets and clear pathways it lacks the necessary precision for monitoring purposes. The sustainability appraisal should show how all new housing, jobs and infrastructure will contribute to the reduction of carbon emissions in accordance with the 4 th and 5 th carbon budgets and sit on a pathway to zero carbon after 2050. This would also be necessary to comply with ss19 and 32 of the Planning and Compulsory Purchase Act 2004.	Mitigation is recommended through-out the SA process
Mr Thompson	The sustainability appraisal suggests that new infrastructure will be funded through CiL and S106. These follow the development so there will inevitably be a period of time in which the new	The IDP will accompany the LP 2033

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	development will be significantly under provided with services and with no reasonable means of accessing these via the existing poor road network. S106 cannot be used to provide that which is listed in the CIL scheme which means that provision of infrastructure outside the proposed settlement“ such as major road improvements“ cannot be funded by S106 and CIL will not be able to provide enough funding.	
Tombling	This identified 7 sites of which 5 were dismissed in the Sustainability Appraisal	N/A
Mr Ingram	The sustainability appraisal should show how all new housing, jobs and infrastructure will contribute to the reduction of carbon emissions in accordance with the 5th carbon budget and sit on a pathway to zero carbon after 2050	Mitigation is recommended through-out the SA process
Ms Nabb	There are very few negative impacts identified in the Sustainability Appraisal for the Culham sites which are close to transport links, including trains. There is only one major negative impact across the 4 Culham options compared to 5 for Chalgrove Airfield and 8 for Harrington. Development at Culham would also provide the much needed bypass for Clifton Hampden. Another option is site the additional development closer to Oxford City where the infrastructure is in place and can meet Oxford's unmet need, for example Grenoble Rd. Both of these options are more sustainable than either Chalgrove Airfield or Harrington	All sites including Culham have been considered through the site selection process.
Mr Fox	The Sustainability Appraisal notes that the Green Belt Study for SODC does suggest that some development could occur on the Grenoble Road site. What is certain is that the transport links between Chalgrove and Oxford are poor and already overloaded.	The SA identifies negative effects with regard to transport infrastructure. An IDP is being prepared and consultation with infrastructure providers will continue to ensure that negative effects are mitigated.

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Mrs Barter – Holton Parish Council	<p>Sustainability Appraisal (SA)</p> <p>The SA assesses Oxford Brookes (former) Wheatley Campus (see Table 20) incorrectly and does not indicate the true impact of the site on the local area. The following sets out the key flaws in the assessment.</p> <p>Sustainability Appraisal Objective 1 The assessment refers to the site in the Parish of Holton. It then goes on to state only the key facts of Wheatley in relation to population and housing ownership. There is no reference to Holton's population or housing ownership. It is considered that although Wheatley is an adjoining village, is a 'larger village' and has a larger population the assessment should primarily take into account Holton to be a true reflection of the site in its locality.</p> <p>Sustainability Appraisal Objective 3 and 4 Again the assessment only refers to Wheatley with no reference to Holton. This is flawed.</p> <p>Sustainability Appraisal Objective 5, 8 and 11 The first reference is incorrect and does not distinguish that there are both brownfield and greenfield elements of the site within the red line as provided. It then refers to it is likely to be an increase in car borne traffic locally, both during construction and operation. It is considered that it is not only likely it is inevitable and that this has not been properly quantified or assessed as to the impact of additional vehicles on rural village roads.</p> <p>Sustainability Appraisal Objective 6 The site may be adjacent to Wheatley - a larger village - but at no point throughout the SA has any consideration been given to the impacts on Holton. It is considered that the 'employment opportunities' provided by the London Road Industrial Estate have been overplayed as this is a very small employment base. It is acknowledged that there is local</p>	<p>SA Objective 1, 3 and 4 have been updated to include information about Holton Parish.</p> <p>SA Objectives 5 8 and 11 has been updated to refer to include: "The site is a part brownfield, part greenfield site within the greenbelt, currently owned by Oxford Brookes University. Any reduction in greenfield land may result in pollution from surface run-off, resulting in potential negative effects."</p> <p>SA Objective 6: Information on Holton has been included with the SA.</p> <p>Objective 7: The SA makes reference to the mature trees and other biodiversity within and surrounding the site.</p> <p>Objective 8: The SA mitigation recommends that a full LVIA should be carried out to inform the layout and capacity of the site.</p> <p>Objective 9: The SA recognises the importance and potential impacts of the Scheduled Ancient Monument and listed buildings in and around the site and now includes the consultation responses from Historic England within the assessment.</p>

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	<p>employment but no assessment has been made as to the availability and whether such a redevelopment of the site would be sustainable in employment terms.</p> <p>Sustainability Appraisal Objective 7 and 8 No consideration has been given to the numerous Tree Preservation Orders (TPOs) on the site. In addition the assessment does not make reference to the contribution of the various mature trees, grassland areas and vegetation surrounding and within the site have to the protection of the Green Belt. The Local Green Belt Study for South Oxfordshire Final Report Sept 2015 suggested that the Oxford Brookes site could be inset from the Green Belt. This assessment was based on merely a desk based assessment with no supporting landscape and visual impact or a proper assessment of the Green Belt in this location. It should be noted that the Green Belt 'washes' over the Oxford Brookes site and therefore very careful consideration should be given to para 83 and 89 of the NPPF so as to not harm the purposes of the Green Belt nor encourage inappropriate development, both of which are being encouraged by SODC in the site allocation's present form.</p> <p>Sustainability Appraisal Objective 9 The assessment fails to recognise the Scheduled Ancient Monument on site - Moated Site 580m South West of Church Farm. A simple search of Historic England notes 37 Listed Buildings within a 600m radius of the centre of the Oxford Brookes Wheatley Campus site, including Grade II,II* and I. In addition, no consideration has been given to the Grade I St Bartholomew Church, located approximately 300m from the nearest site boundary of Oxford Brookes Wheatley Campus. This is a significant flaw in the assessment and needs to be rectified.</p>	

A number of consultation comments were received for Chalgrove Airfield, these are all included within the table below.

Chalgrove Parish Council response to SODC Local Plan 2032		
SA Objective/ assessment	Consultation Responses	SODC SA Response
<p>SA Objective 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> <ul style="list-style-type: none"> a) Chalgrove Airfield is a partially previously developed site adjacent to the B480 comprising 130 Ha b) The site is in single ownership, having been transferred from the Ministry of Defence (MOD) to the Homes and Community Agency (HCA). c) Significant negative effects have been identified due to the relative isolation of the site, the larger village of Chalgrove is located to the east of the B480, approx. 1miles from the site, however there is a lack of existing infrastructure and services due to isolated location, and the development would need to include provision of infrastructure and services to serve residents. d) Mitigating adverse effects column states that "Continued consultation with Oxford City is essential to ensure that their unmet housing needs are incorporated into the Local Plan development" 	<ul style="list-style-type: none"> a) The Plan states that HCA propose to build on 144 hectares, The Plan also states a density of 30 homes per hectare, and we were advised by SODC that development in a rural area would normally be a density of 25 homes to reflect the openness of the surrounding countryside. The large majority of the proposed development site is Greenfield, is largely used for agricultural purposes, and has not been previously developed. Approximately 10% of the site has developed. b) Had not been transferred at time of SA report, FOi response stated it had not been transferred at 27 July. There is a question as to whether the ownership of the site has followed due process to offer the land back to previous owners under Crichel Down rules c) See comment against Objectives 3&4. ii) The statement that Chalgrove is 1mile from the site is misleading; the airfield is situated directly across the B480 from the village. Chalgrove is more to the south than the east; these points 	<ul style="list-style-type: none"> a) Chalgrove site comprises a former airfield which Airfield is a partially previously developed. At this stage of the SA process the SA made an assumption of 30dph, this will be finalised and the SA updated where appropriate. b) The site is in single ownership, having been transferred from the Ministry of Defence (MOD) to the Homes and community agency (HCA). Single ownership can provide a greater certainty of delivery. The HCA is an executive non-departmental public body. It is the national housing and regeneration delivery agency for England. The statutory objectives of the HCA are listed in the Housing and Regeneration act 2008, but generally seek to improve the supply and quality of housing and sustainable development. c) See response to objectives 3 & 4 below. Chalgrove is 1 mile from the airfield site to the centre of Chalgrove if you drive in a car – 0.7 miles if you walk, the walking route is quicker, (as the crows flies probably less than 0.7 miles). The SA has been updated to ensure that this is clear.

Chalgrove Parish Council response to SODC Local Plan 2032		
SA Objective/ assessment	Consultation Reponses	SODC SA Response
	<p>raise questions over the quality of the assessment and accuracy of findings.</p> <p>d) Chalgrove is not suitably located to meet Oxford City's unmet housing need, so that is not really relevant. Development to meet Oxford City's unmet needs should be located in a site closer to Oxford with more sustainable travel and closer to major employment.</p>	<p>d) The PO states that we currently propose to make provision for an additional 3,750 homes as a working assumption to help meet the housing needs of Oxford City. There is no reference to meeting all of Oxford's unmet need at Chalgrove.</p>
<p>SA Objective 3 - " To improve accessibility for everyone to health, education, recreation, cultural, and community facilities and services" & 4 - "To maintain and improve people's health, well-being, and community cohesion and support voluntary, community, and faith groups."</p> <p>Although Chalgrove is classified as a larger village existing services would reach capacity with an adjacent new settlement, due to the significant population increase. This could put pressure on existing communities that could reduce community cohesion, resulting in significant negative effects. The site is relatively isolated and does not have good accessibility to the existing village of Chalgrove due to the site's location on the east side of the 8480, resulting in significant negative effects towards access to services. A new</p>	<p>As stated against Objective 1 (see point c above) Chalgrove has a lack of existing infrastructure and services. The Primary School will exceed capacity with the larger village a location of the 200 homes and will have no capacity for any further development.</p> <p>There is no secondary school in the village, pupils need to travel to Watlington, which itself is subject to an allocation of new homes. The doctor's surgery would be impacted with a negative effect on level of service for residents. Cars would be needed to use the shops which would cause traffic and parking issues within the village.</p> <p>There is an assumption that an IDP would be required, however there is no mention of the timeliness of the delivery of infrastructure. Against all of the other options the wording for providing</p>	<p>A review of the SA has been undertaken, the following information was within the SA Report.</p> <p>'An IDP would be produced, to ensure that infrastructure is provided in a timely fashion'. The mitigation against this objective states: Ensure improvements to service provision commensurate with any increases in population.</p> <p>Good phasing of development will be required.</p> <p>Continue to work with the agents GVA to ensure a masterplan is produced with all mitigation recommendations incorporated.</p>

Chalgrove Parish Council response to SODC Local Plan 2032		
SA Objective/ assessment	Consultation Responses	SODC SA Response
settlement at Chalgrove could be developed over time in line with infrastructure delivery. Development could provide the opportunity to improve services in Chalgrove, through the Cil requirements and the IDP.	infrastructure is: 'An IDP would be produced, to ensure that infrastructure is provided in a timely fashion'.	
SA Objectives - 4 "To maintain and improve people's health, well-being, and community cohesion and support voluntary, community, and faith groups." & 5 "To reduce harm to the environment by seeking to minimise pollution of all kinds especially water, air, soil and noise pollution."	The health and safety concerns of the use of a runway on Chalgrove airfield for Martin Baker and for RAF Benson are not mentioned. Neither is the fact that there is an explosive store on the site for use in the testing of ejector seats. The testing of the seats takes place on the site.	<p>This information has now been included within the SA against objective 4 and 5:</p> <p>‘The site is a 2nd World war airfield and issues of contamination maybe present at the site, this could result in negative effects to new residents without mitigation.’</p> <p>The site is also under the flight path of RAF Benson, Martin Bakers Meteor also occupies the site which requires frequent flights and carries out explosive tests as part of their business. Resulting in potential significant negative effects to new residents in terms of noise.</p> <p>Mitigation has been updated with the following: ‘Ensure any issues of contaminated land are addressed.’</p> <p>Mitigation recommendations include: Ensure any issues of contaminated land are addressed.</p> <p>Carry out an acoustic study to inform site selection and mitigation required. ‘</p>

Chalgrove Parish Council response to SODC Local Plan 2032		
SA Objective/ assessment	Consultation Reponses	SODC SA Response
<p>SA Objective 5 - "To reduce harm to the environment by seeking to minimise pollution of all kinds especially water, air, soil and noise pollution."</p> <p>The site is an airfield and is partially previously developed land.</p> <p>a) The site is within a Nitrate Vulnerability Zone, there is low chance of surface water flooding; however the addition of hard surfaces can increase the risk of surface water runoff and pollution, resulting in potential</p> <p>b) Due to the relative isolation of the site, it is likely that a car based development will occur, resulting in potential negative effects if further development occurs here.</p>	<p>a) The large majority of the proposed development site is greenfield; it is largely used for agricultural purposes, and has not been previously developed. Approximately 10% of the site has developed.</p> <p>b) entry against Option 3 - Grenoble Road reads 'The sites are within a Nitrate Vulnerability Zone, there is a very high chance of surface water flooding' This is misleading, I cannot find any other reason for the high risk</p> <p>c) No mention is made of the impact of noise and pollution to the Chalgrove site.</p> <p>The proposed development at the airfield, if it delivers at the expected rate of 200 per year, as stated by Head of Planning. will take 17.5 years to complete. This will result in a long term negative impact on the rural area and surrounding villages. At a meeting with Little Milton Parish Council HCA quoted a rate of SO homes per annum which would take 70 years and go well beyond the planned period. The following</p>	<p>A review of the SA has been undertaken, the following information was included within the SA Report.</p> <p>a) Chalgrove site comprises a former airfield which Airfield is a partially previously developed.</p> <p>b) Updated</p> <p>c) In the short term noise pollution may increase during the construction phase, resulting in potential negative effects if further development occurs here. The scale of development when compared to the other options is less, however the SA has now been updated to state: Due to the scale of development noise pollution will increase during the construction phase, which may continue for a number of years, resulting in potential negative effects if further development occurs here.</p>

Chalgrove Parish Council response to SODC Local Plan 2032		
SA Objective/ assessment	Consultation Reponses	SODC SA Response
	<p>statements have been taken from the report for other options. The same applies to Chalgrove Airfield but has not been included for it:</p> <p>Option 2, 4 and 6 -Due to the scale of development noise pollution will increase during the construction phase, which may continue for a number of years, resulting in potential negative effects if further development occurs here. Options 3 - There is likely to be an increase in car borne traffic locally, both during the construction and operational phase, resulting in potential negative effects if further development occurs.</p>	
<p>Objective 6 - "To improve travel choice and accessibility, reduce the need to travel by car and shorten the length and duration of journeys."</p> <p>a) There are regular buses to Oxford ever half an hour with bus stops on the B480 or A4078 from Chalgrove. Both routes take approx. 1hr and stop at larger villages on route. The buses to reading are half hourly and take 1.20hrs. Buses to Didcot and Milton Park provide limited access, buses run approx. half hourly from the adjacent B480, with a journey</p>	<p>a) This is incorrect; Chalgrove has a very limited bus service. There is only one bus service, the T1 runs from Chalgrove village (not the B480) Monday to Friday 06:22, 07:10, 07:41, 08:34, 10:31 then hourly until 14:31, 15:26, 16:31, 17:41, 19:15, and 20:31. The times highlighted in red go through to Oxford, at all other times there is a need to change at Cowley. Saturday service is hourly from 07.44 until 19.54, 5 of these go to Oxford but at all other times there</p>	<p>a) The SA Report has been updated to reflect the inconsistencies regarding public transport provision, the SA Report and now states the following: 'There are buses to Oxford every hour (with changes in the off peak), buses stop early evening and there is no Sunday services. Buses take approx. 1hr and stop at larger villages on route.</p> <p>There is no direct route to Reading.</p> <p>Buses to Didcot and Milton Park are</p>

Chalgrove Parish Council response to SODC Local Plan 2032		
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<p>time of 1.5hrs; compared to a car journey of 30minutes.</p> <p>b) Monument Park, the business park is located across the road on Warpsgrove Lane and would provide an employment opportunity for new residents.</p> <p>c) Chalgrove Airfield is a former Second World War airfield located directly north of the village of Chalgrove, north east of the B480, approximately 11 miles to the east of central Oxford, 19 miles from Reading and approximately 5 miles south of junction 7 of the M40 motorway. There is no train station at Chalgrove.</p> <p>d) The site is relatively isolated and does not have good accessibility to Chalgrove due to the sites location on the east side of the B480.</p>	<p>is a need to change at Cowley. The journey time to Oxford on the direct route is approx. 50 minutes. This will be extended by 20 - 30 minutes when changing at Cowley. Chalgrove is nowhere near the A4078 which is in Brecon Powys. We have no access to buses to Reading or Didcot or Milton Park. These buses would need to be picked up at Oxford; the journey time from Chalgrove to Reading by bus is 2.5 hrs as opposed to 30 - 40 minutes by car. The journey to Milton Park by bus from Chalgrove is 1.5 hours as opposed to 30 - 40 minutes by car. This is a strategic employment site, the implication from the information in the plan is that it would be easy to travel there by public transport whereas it would require journeys to be made by car. Development on this site is directly opposed to this objective.</p> <p>b) Monument Business Park is a collection of small businesses, employment opportunity will be limited, and there will not be sufficient employment for the size of proposed development there: Average vacancy rates: 6</p>	<p>not direct and provide limited access, compared to a car journey of 30 minutes.</p> <p>b) Monument Park, Business Park is located across the road on Warpsgrove Lane and would provide employment opportunities for new residents, if employment provision was expanded.</p> <p>c) SA updated: Chalgrove site comprises a former airfield which Airfield is a partially previously developed directly north of the village of Chalgrove, north of the B480, approximately 14.1 miles from Oxford, 19 miles from Reading and approximately 7 miles from junction 7 of the M40 motorway. There is no train station at Chalgrove.'</p> <p>d) An ETI is being carried out to support the emerging Local Plan and to inform decision making.</p>

Chalgrove Parish Council response to SODC Local Plan 2032		
SA Objective/ assessment	Consultation Responses	SODC SA Response
	<p>c) Google maps have been used for travel times in the Local Plan document, using this for consistency Chalgrove is 14.1 miles from Oxford and 7 miles from J7. The site is to the North of the B480 not the East.</p> <p>d) Any intention to create "good access" to the village would damage the effectiveness of the B480 as a bypass unless it was by bridges</p>	
<p>SA Objective 7 - " To conserve and enhance biodiversity"</p> <p>No known biodiversity constraints are identified, resulting in no impact to biodiversity constraints</p>	<p>If the biodiversity constraints are unknown then so is the impact, the mitigation states that a Biodiversity Action Plan be produced for the site, the impact cannot be known until this has been carried out.</p>	<p>The SA states: No known biodiversity constraints are identified, resulting in potentially no impact to biodiversity constraints, however a BAP phase 1 survey should be undertaken</p> <p>The overall scoring for this objective has now been changed to uncertain.</p>
<p>SA Objective 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>There is a risk of flooding from surface water, which can reduce soil quality, resulting in potential negative effects if development were to take place</p>	<p>Mitigation for this objective reads - "Encourage the use of permeable surfaces and SuDS." Mitigation for Objective 11 reads "A Sequential test should be carried out. Encourage green infrastructure and biodiversity enhancement schemes; these are beneficial to flood prevention and resilience to climate change. Include SuDS in all designs."</p>	<p>The Environmental Agency have been consulted through-out the Local Plan development and their views will continue to be sorted and integrated into the Local Plan.</p> <p>Issues relating to flooding are discussed under Objective 11, however the SA has been updated to reflect concerns under objective 8 and now includes the following:</p>

Chalgrove Parish Council response to SODC Local Plan 2032		
SA Objective/ assessment	Consultation Responses	SODC SA Response
	Taking into account Chalgrove's documented history of flooding, contributed to by run off from the airfield, there is a requirement for a full SRFA and any risk to flooding on the site or to the existing village of Chalgrove be mitigated.	Consultation comments received raise the following concerns: The airfield being geographically higher which already contributes to flooding in Chalgrove. It has several springs on it. In bad weather water off the airfield pours down Chapel Lane and Marley Lane with homes being flooded as it adds to the two waterways which pass through Chalgrove.
SA Objective 9 - " To conserve and enhance the district's historic environment including archaeological resources and to ensure that new development is of a high quality design and reinforces local distinctiveness." Chalgrove Battlefield lies between the hamlet of Warpsgrove and the village of Chalgrove; therefore, significant heritage constraints exist on the western edge of Chalgrove Airfields, resulting in significant negative effects if development were to occur here without mitigation.	Response from the Battlefield Trust: The Battlefields Trust is alarmed about the proposal to build 3,500 houses on Chalgrove Airfield. This, if it is implemented, would see the destruction of around one third of the Chalgrove (1643) battlefield, which is located on and adjacent to the airfield, and would significantly affect the setting of the remaining area. This plan acknowledges that the battlefield has been registered by Historic England. This registration is a material consideration within the planning process and the National Planning Policy Framework (para 132) is clear that substantial harm to registered battlefields should be wholly exceptional. The Trust is unsure how destruction of one third of the battlefield can be	The SA has noted the potential negative effects without mitigation. Historic England recommend the following: <ul style="list-style-type: none"> • Oxfordshire Historic Landscape Characterisation should be used to inform the layout of any new settlement, • This assessment may require more than a desk-based assessment and evaluation and should consider both above and below-ground features and remains. This response has now been included within the SA Report as mitigation.

Chalgrove Parish Council response to SODC Local Plan 2032		
SA Objective/ assessment	Consultation Responses	SODC SA Response
	<p>characterised as anything other than 'substantial harm'. Clearly in the whole of South Oxfordshire there are other places where houses can be built and the requirement to use the airfield at Chalgrove must fail the exceptional test on this basis.</p> <p>The Trust will oppose use of this site vigorously at all stages and urges the Council to revisit this proposal urgently and to remove the development of the Chalgrove battlefield from its plans.</p>	
<p>SA Objective 11- "To reduce the risk of, and damage from, flooding." Site is not within a floodplain and is previously developed land, however further development here is likely to increase hard surfaces, which can result in surface water flooding.</p>	<p>The site is adjacent to a flood plain, and is at a higher elevation, which will affect the existing floodplain. Mitigation reads "A Sequential Test should be carried out. Encourage green infrastructure and biodiversity enhancement schemes; these are beneficial to flood prevention and resilience to climate change. Include SuDS in all designs." Taking into account Chalgrove's documented history of flooding, contributed to by run off from the airfield, there is a requirement for a full SRFA and any risk to flooding on the site or to the existing village of Chalgrove be mitigated.</p>	<p>The SA has been updated to reflect concerns raised:</p> <p>Consultation comments received raise the following concerns: The airfield being geographically higher already contributes to flooding in Chalgrove. It has several springs on it. In bad weather water off the airfield pours down Chapel Lane and Marley Lane with homes being flooded as it adds to the two waterways which pass through Chalgrove.</p> <p>The following is included in the mitigation: A SFRA level 1 will ensure that the developable areas of any of these strategic allocations are within flood zone 1 only. A FRA will be required to support any strategic allocations.</p>

Chalgrove Parish Council response to SODC Local Plan 2032		
SA Objective/ assessment	Consultation Responses	SODC SA Response
<p>SA Objective 12 - " To seek to minimise waste generation and encourage the reuse of waste through recycling, compost, or energy recovery"</p> <p>The development of new housing, will lead to construction and demolition waste being produced</p>	<p>On all other options it is stated that this is 'resulting in potential negative effects' but not on the Chalgrove Airfield entry.</p>	<p>Chalgrove scores the same as all options against this objective,</p>
<p>SA Objective 13 - "To assist in the development of: a) high and stable levels of employment and facilitating inward investment; b) a strong, innovative and knowledge-based economy that deliver high-value-added, sustainable, low impact activities; c) small firms, particularly those that maintain and enhance the rural economy; and d) thriving economies in our towns and villages."</p> <p>Additional housing will increase the population and maintain and enhance the rural economy, by supporting and enhancing the larger villages especially Chalgrove, resulting in potential positive effects.</p> <p>a) Additional housing will increase the population and maintain and enhance the rural economy, by supporting and enhancing the larger villages especially Chalgrove, resulting in potential positive effects.</p> <p>b) There are significant levels of dissatisfaction and frustration with</p>	<p>a) Additional housing of the proportion proposed in the strategic option of at least 3,500 homes will increase the population of Chalgrove fourfold going from just under 1200 homes to 4900* and will have a hugely negative impact on the character and nature of the village of Chalgrove, its community and its landscape, as well as surrounding villages including Stadhampton, Little Milton, Cuxham, Great Haseley, Little Haseley, Berrick, Roke, Great Milton, Newington, Shirburn and Watlington * taking into account the 200 homes allocation as a larger village.</p> <p>b) Chalgrove has fibre broadband as part of Better Broadband Oxfordshire, there is currently no issue with Broadband speed. There is an issue with mobile phone connectivity.</p> <p>c) Monument business park is a collection of small businesses, employment opportunity will be limited, and there will not be sufficient employment for the size of proposed</p>	<p>a) This objective assesses the potential impact on the rural economy, the issues raised are assessed within other SA objectives and the potential impacts have noted and mitigation included within the SA.</p> <p>b) The following has been included in the assessment: 'Chalgrove has fibre broadband as part of Better Broadband Oxfordshire, therefore there is currently no issue with broadband speed, and however there is an issue with mobile phone connectivity.'</p> <p>c) The SA noted that access to Didcot and Milton Park is limited, however the SA has been updated and now includes the following: '</p> <p>d) Didcot and Milton Park provide access to employment, however access is limited. There is no direct public transport, journey time is 1.5hrs; compared to a car journey of 30 minutes, resulting in potential negative effects.</p>

Chalgrove Parish Council response to SODC Local Plan 2032		
SA Objective/ assessment	Consultation Reponses	SODC SA Response
<p>current broadband provision in South Oxfordshire. The lack of adequate broadband services has a direct impact on local businesses and the economy and hence there is a need for fast and reliable access to the internet and mobile phone communications.</p> <p>c) Monument Park, business park is located across the road on Warpsgrove Lane would provide employment opportunities for new residents, resulting in potential positive effects.</p> <p>d) Didcot and Milton Park provide access to employment, however access is limited. Buses run approx. half hourly from the adjacent B480, journey time is 1.5hrs; compared to a car journey of 30 minutes, resulting in potential negative effects.</p>	<p>development there. Average vacancy rates: 6. Buses do not run to Didcot and Milton Park, the journey time by bus is 1.5 hours and drive time 30 - 40 minutes without traffic</p>	
<p>SA Objective 14- "To support the development of Science Vale as an internationally recognised innovation and enterprise zone" and d) in that list is "supporting and accelerating the delivery of new homes".</p> <p>Does not apply</p>	<p>Chalgrove Airfield does not support this objective it negative effect as it diverts money and resources away from the Science Vale.</p>	<p>The assessments for each option have been assessed consistently, not all future development will occur within Science Vale, therefore if the site in question is not in Science Vale then no direct impact has been identified.</p>

Chalgrove Parish Council response to SODC Local Plan 2032		
SA Objective/ assessment	Consultation Responses	SODC SA Response
SA Objective 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."	Development at Chalgrove Airfield does not meet this objective, the plan puts 3500 homes in an isolated area with the provision of only one secondary school	SA Objectives 3 & 4 raise issues relating to schools and other community facilities and services.
SA Objective 16- "To encourage the development of a buoyant, sustainable tourism sector". Does not apply	Building a town in the direct view of the AONB will negatively impact this objective	The SA has been updated to reflect this concern for all options were appropriate.
SA Objective 17- "Support community involvement in decisions affecting them and enable communities to provide local services and solutions." The Council has involved the community in the decision making process and the community.	On the subject of the strategic site preferred option we believe the community has not been involved in the decision making process or have been sufficiently consulted. This site came to the SODC late in the process but the timetable has not been amended to give the affected communities an opportunity to respond, our District Councillor had no opportunity to comment on the proposal. 27.05.16 - Chalgrove Parish Council met with John Cotton, Leader of SODC, and Adrian Duffield, Head of Planning at SODC, and was informed of the proposal to include Chalgrove Airfield within their list of suitable sites for the development of 3500 homes. 28.05.16 - HCA wrote to Chalgrove Parish Council stating that "...responsibility for	a) The PO consultation took place between 27 June and 19 August 2016. The PO consultation was well publicised with all parish councils and the public given the chance to make comments on the preferred options. The preferred option of the new settlement at Chalgrove was publicised throughout this period and was not introduced late in the process. In addition, the additional Regulation 18 consultation April 2017 will give a further opportunity for consultation, in line with regulations and the Regulation 19 stage.

Chalgrove Parish Council response to SODC Local Plan 2032		
SA Objective/ assessment	Consultation Reponses	SODC SA Response
	the former RAF Chalgrove airfield has transferred from the Ministry of Defence to the Government's Homes and Communities Agency (HCA)" 06.06.16 - Chalgrove Parish Council informed the public (by way of emails, web updates, social media, posters and leaflets) of SODC and HCAs intention to include Chalgrove Airfield as one of the possible sites within their proposed Local Plan 2032.	

Consultation Comments received for the Sustainability Appraisal PO1 June 2016		
Consultee	Response	SODC Response
Natural England	Chalgrove Airfield does not appear to be subject to any major constraints relating to Natural England's remit. However, we were unable to find any landscape capacity assessments of the two options. Although the Sustainability Appraisal provides some basic information as to the likely landscape effects of these two options, we would normally expect a more detailed landscape assessment to inform the option selection process and advise that both sites are assessed both to inform the selection process and to guide the development specifications in the local plan for the site chosen. Chalgrove Airfield site does not appear well connected to the wider countryside and as such we suggest that the development specifications for the site include significant elements of greenspace and linkages to the wider countryside.	LCA to be carried out for Chalgrove Airfield.
Mr Fieth	Chalgrove: There is a (barely) hourly (not half hourly as stated in the Sustainability Appraisal Report) rural bus service to Oxford.	The SA has been updated to reflect inconsistencies noted.

Consultation Comments received for the Sustainability Appraisal PO1 June 2016		
Consultee	Response	SODC Response
Mr Boone	<p>The document states: " There are regular buses to Oxford ever half an hour with bus stops on the B480 or A4078 from Chalgrove. Both routes take approx. 1hr and stop at larger villages on route. The buses to Reading are half hourly and take 1.20hrs. Buses to Didcot and Milton Park provide limited access, buses run approx. half hourly from the adjacent B480, with a journey time of 1.5hrs; compared to a car journey of 30minutes" This is absolute nonsense. There is only ONE bus service via Chalgrove, the T1. The T1 operates HOURLY at best, and not at all at weekends or evenings. The A4078 is in Wales, so I have no idea how that is relevant. The nearest similar road I can find is the A4074 - there is NO ROUTE from Chalgrove to the A4074 by public transport without going into Oxford first, so are you expecting people to walk for four miles along country lanes to get a bus to Reading? It is quicker to get a bus to London and back out to Reading than it is from Chalgrove. There are NO BUS ROUTES to Didcot of Milton Park from Chalgrove.</p>	<p>The SA has been updated to reflect inconsistencies noted.</p>
Mr Dymott	<p>The Sustainability appraisal report of the south Oxfordshire local plan 2032 is factually inaccurate, and misleading, this includes the following:</p> <p>Page 71 " the larger village of Chalgrove is located to the east of the B480, approx. 1 mile from the site Chalgrove has approximately 1,100 houses, this make it a 1/3 of the size of the proposed development. Chalgrove is across the road, not 1 mile away.</p> <p>Page 71" Chalgrove Airfield is a partially previously developed site This is misleading, less than 8% of the total airfield has runway or hardstanding. 92% is completely undeveloped grazing and is used to graze sheep.</p> <p>Page 71 " The site is in single ownership, having been transferred from the Ministry of Defence (MOD) to the homes and Community Agency (HCA) Single ownership can provide a greater certainty of delivery At time of writing this is simply not true, the HCA have not taken position of the airfield, and I don't believe the MOD can simply transfer ownership without offering the land back to the previous owners or their successors under Crichel Down rules.</p> <p>Page 72" The site is an airfield and is partially previously developed land This is misleading, less than 8% of the airfield has runway or hard standing, the balance is virgin grazing having never been developed.</p>	<p>The concerns raised have been addressed above in the response from Chalgrove Parish council, to save repetition please see above</p>

Consultation Comments received for the Sustainability Appraisal PO1 June 2016		
Consultee	Response	SODC Response
	<p>Page 72“ there is low chance of surface water flooding This is misleading, whilst there is low change of surface water flooding on the airfield, as previously stated. The report in to the last major flood of Chalgrove village in February 2014, that made national news due to its severity cited water runoff from the airfield as a contributing factor.</p> <p>Page 73“ There are regular buses to Oxford ever half an hour with bus stops on the B480 or A4078 from Chalgrove. Both routes take approx. 1hr and stop at larger villages on route. The buses to reading are half hourly and take 1.20hrs. Buses to Didcot and Milton Park provide limited access, buses run approx. half hourly from the adjacent B480, with a journey time of 1.5hrs; compared to a car journey of 30minutes. This whole section is completely fabricated, there is only one bus route, it goes to Oxford in the mornings only, after that it runs once every hour, and only as far as Cowley. There is no bus to Reading, Didcot, Milton Park or anywhere else. There are no A roads in Chalgrove. The A4078 mentioned above is in Wales! The report may mean the A4074 which is approximately 6½ miles to the south West of the site.</p> <p>Whilst it may be a 30 minute car journey to Milton Park in the middle of the day, during rush hour it take 50 minutes due to traffic. To travel by public transport the quickest way is to take the T1 to Lewkner, then the Oxford Tube to Oxford and then the X32 to Milton Park a journey time of 2 hours 16 minutes. To get to Reading, it's quickest to go via Heathrow Airport!</p> <p>Page 73“ Monument Park, the business park is located across the road on Warpsgrove Lane and would provide an employment opportunity for new residents This is misleading at time of writing there are 2 job vacancies at Monument Business Park, hardly enough jobs for 8,050 new residents (Based on 2.3 people per household “ 2011 census)</p> <p>Page 76“ Site is not within a floodplain and is previously developed land, This report keeps referring to the airfield as previously developed land, this is misleading, as previously stated less than 8% of the site is PDL.</p>	
Ms Dudley	<p>The site is not sustainable with regard to transport. The 'facts' regarding travel provided in the Sustainability Appraisal, which is supposed to 'inform' this decision, are false, as there is no bus to Reading or Didcot, and no adjacent A4078 (in Wales) or even the A4074 which is 5 miles away along narrow lanes. Buses to Oxford are approximately hourly and have never been half-hourly in living</p>	<p>The concerns raised have been addressed above in the</p>

Consultation Comments received for the Sustainability Appraisal PO1 June 2016		
Consultee	Response	SODC Response
	<p>memory. If this decision is based on such data it is not credible and has not been prepared with due diligence.</p> <p>Surrounding villages would require by-passing: Stadhampton and Watlington are already morning traffic jams: Little Milton has some very narrow pavements on its winding high street: Berrick Salome has none. This would be a gross misuse of public money when Grenoble Road and Culham both have road and transport infrastructure in place.</p> <p>The site is not sustainable with regard to flooding - there is already considerable runoff from the airfield which comes down into the village, and any soak-away facility would access the gravel substrate, and emerge in the village in the spring line. SuDS are not everlasting, and are estimated to function for a maximum of 25 years.</p> <p>The site is also under the flight path of RAF Benson with resultant noise from Chinooks and Pumas, plus the frequent flights of Martin Baker's Meteor. Put these together with the loud explosive tests carried out at Martin Baker, and potential home buyers will probably baulk at living so close to an explosives store. Martin Baker is a world-renowned ejection seat maker and also performs regular maintenance checks on its seats, and is vital to employment in Chalgrove.</p> <p>The site, generally used for sheep grazing, is central to the view from Watlington Hill in the Chilterns AONB, and would deface this view rendering it a low priority viewpoint and robbing Watlington of much of its tourist industry.</p> <p>The 200 hundred homes probable (pending updated FRA) under the Neighbourhood Plan will put GP surgery and Primary School to their limits, and there is no mention in this document of a primary school in the list of facilities to be supplied. A new surgery and new primary school would therefore need to be in the first build to go with the first 200 houses, and grow to support the next 200 houses in the second year of development.</p> <p>Chalgrove as a village looks to Watlington, Thame, Benson and Cowley - this heirarchy would be totally disrupted by a New Town. Provision of a supermarket in the New Town would draw custom away from Chalgrove and Watlington High Street shops which would take the heart out of those centres.</p>	<p>response from Chalgrove Parish Council, to save repetition please see] above</p> <p>The SA has been updated to reflect these comments.</p>

Consultation Comments received for the Sustainability Appraisal PO1 June 2016		
Consultee	Response	SODC Response
	<p>Provision of a Secondary School as listed might tend to draw Chalgrove children away from the Icknield School in Watlington, since the authorities are unlikely to provide transport to Watlington when a closer secondary school exists. I do not know if Icknield School would then still be viable.</p> <p>This is no support to settlement heirarchy. There is no relevance at all to Science Vale development. The route there would be through small villages along narrow winding country lanes which County are already unable to maintain properly. Possibly in due course, once perhaps a two thirds of the town is built, Thames Travel might consider providing a bus in that direction, but the roads are totally unsuitable for that size of conveyance.</p> <p>The Objective to avoid any increase in pollution is not served by Chalgrove Airfield. The presence of upwards of 4,000 cars travelling to work in the morning (and back in the evening) would seriously impact on air quality - and Watlington, which would be on one route out, already has serious air quality issues.</p>	
Mr Thompson	<p>The sustainability appraisal makes reference to a half hourly bus service to oxford which does not exist. The bus service is hourly at best and finishes at 7pm and does not run on Sundays or bank Holidays and is no longer fully subsidised so is precarious. The travel time to oxford is greater than 1 hr. There is reference to bus services to Reading and Didcot and Milton Park. There is no direct bus to these settlements and the times are totally unrealistic. If they are based on travelling into Oxford it will take over 2 hrs to get to Reading and nearly 2 to get to Abingdon or Didcot. There was 1 journey per week to Wallingford on which some of these times may have been based. There are good public transport journey planners using up to date timetabling which can give accurate journey times. Times quoted to get to other population centres significantly under estimate the travel time by car even with no traffic. To get to Wallingford is 20 minutes, Science Vale is 35 minutes, Thame is 20 minutes along narrow unclassified and in some places single track roads. Redbridge park and ride is 23 minutes during which you pass the proposed site at Grenoble road - so it is impossible to get to oxford station in 22minutes. The most efficient way of getting into oxford takes you past the Grenoble road site. The most efficient way to and from Abingdon also takes you past the Grenoble Road site. The current nearest park and ride for oxford is Redbridge which in the County Council transport plan is scheduled to be closed and replaced by a site at Lodgehill just north of Abingdon. This will mean that the nearest park and ride for central oxford will be 30-40 minutes from the new site and accessing it would require you to drive past the Grenoble road site.</p>	<p>The concerns raised have been addressed above in the response from Chalgrove Parish council, to save repetition please see above</p>

Consultation Comments received for the Sustainability Appraisal PO1 June 2016		
Consultee	Response	SODC Response
Dr Murfett – Chilterns conservation board	<p>The Sustainability Appraisal (page 73) simply states The site is not in the Green Belt and is not in the AONB.</p> <p>However, it is possible that the airfield site is visible from within the AONB (e.g. from Watlington Hill, a National Trust grassland site providing panoramic views over the flat land of Oxfordshire Vale).</p> <p>The South Oxfordshire Landscape Assessment SPD (Atlantic Consultants) concludes on LCA3 the Clay Vale/ Undulating Open Vale that: areas of open landscape on elevated ground and on the floor of the vale (including airfield sites) are visually exposed and new development would be highly prominent unless closely associated with existing built form or well-integrated within new landscape frameworks.</p> <p>This intervisibility of Chalgrove airfield with the Chilterns AONB should be assessed through a Landscape and Visual Impact Assessment and, if visible, could act as a constraint on the height and extent of development, see the Chilterns Conservation Board's Position Statement on Development Affecting the Setting of the Chilterns AONB available here http://www.chilternsaonb.org/conservation-board/planning-development/position-statements.html</p> <p>Furthermore impact on the AONB is not only about visual impact. The AONB can be affected adversely by, for example, noise, air and water pollution, loss of tranquillity, light spill over previously dark landscapes and skylscapes, water abstraction to serve development, increased recreation pressures etc.</p> <p>Traffic through the Chilterns AONB on the B4009 is likely to increase, worsening air quality in the Watlington Air Quality Management Area. Upgrades to the route to the M40 could affect the rural character of the road. Our guidance note, prepared with the County Councils, Environmental Guidelines for the Management of Highways in the Chilterns http://www.chilternsaonb.org/uploads/files/ConservationBoard/Environmental_Guidelines_Highways.pdf summarises advice on how to avoid inappropriate changes and manage roads to conserve and enhance the special qualities of the AONB.</p>	<p>The SA has been updated to reflect these comments.</p> <p>Mitigation recommends: A full detailed landscape and visual impact assessment will be required to inform the final capacity of the site.</p>
Ms Nabb	<p>There are numerous inaccuracies in the Sustainability Appraisal Report relating to the review of the Chalgrove Airfield site against the Strategic Objectives the Parish Council response to the consultation includes an appendix which gives more detail.</p>	<p>The concerns raised have been addressed above in the response from</p>

Consultation Comments received for the Sustainability Appraisal PO1 June 2016		
Consultee	Response	SODC Response
		Chalgrove Parish council, to save repetition please see above
Mr Fox	The Sustainability Appraisal notes that the Green Belt Study for SODC does suggest that some development could occur on the Grenoble Road site. What is certain is that the transport links between Chalgrove and Oxford are poor and already overloaded.	The SA identifies negative effects with regard to transport infrastructure. An IDP is being prepared and consultation with infrastructure providers will continue to ensure that negative effects are mitigated.

Consultation Comments received for the Sustainability Appraisal PO1 June 2016		
Consultee	Response	SODC Response
Mr Anthony	<p>There are also a number of material inaccuracies and/or misleading comments in your Sustainability appraisal relating to the existing public transport links and travel times and any newly established links would be too lengthy to be practical which in turn would promote individual car use.</p> <p>This would be entirely contrary to your stated policy of encouraging environmentally friendly travel to work. Grenoble road is a much more environmentally friendly and sustainable site and development there would affect a tiny percentage of green belt land which could be compensated for in other ways as identified in the Oxford Growth report of May 2016.</p>	<p>The SA has been updated to reflect inconsistencies noted.</p> <p>Grenoble Rd has been assessed through the site selection process.</p>

Consultation Comments received for the Sustainability Appraisal PO1 June 2016		
Consultee	Response	SODC Response
Mrs Voss	Information in the sustainability Appraisal is incorrect “ there are no ½ hourly busses to Oxford and no buses to Didcot, Milton Park and Reading at all. These could obviously be introduced, but the travel times would mean that most would travel by car. It is too far from the science vale. The local economy would not be able to deliver local jobs for large numbers. Best sites are Grenoble Road and Culham.	The SA has been updated to reflect inconsistencies noted.

Consultation Comments received for the Sustainability Appraisal PO1 June 2016		
Consultee	Response	SODC Response
Dr Colquhoun	A revision of the sustainability appraisal for Chalgrove Airfield to include the impacts on Cuxham and Watlington e.g. air quality, congestion and transport the choice is poor. These impacts are ignored in the current one. The assumptions about public transport provision are optimistic given the rate of removal of service we have seen recently.	The concerns raised have been addressed above in the response from Chalgrove Parish Council, to save repetition please see above The SA has been updated to include these comments.

Consultation Comments received for the Sustainability Appraisal PO1 June 2016		
Consultee	Response	SODC Response
Cllr Turner	<p>The Sustainability appraisal is flawed in many respects the major ones being as follows:</p> <p>(SA1) The airfield is not a partially developed Brown Field Site. It is 90% grass land being former farm land.</p> <p>(SA 1) No comments have been made about local evidence of a munitions dump and the burial of parts of aircraft on the site.</p> <p>(SA 1) The proposed airfield development of housing is only the width of the B480 from properties in Chalgrove not 1 mile away.</p> <p>(SA 1) To say there is a lack of local infrastructure is a slur on what is probably the most sustainable village in South Oxfordshire. The Parish Council and residents have worked hard together to make it the great sustainable place it is today. The village has six shops, doctor's surgery, church, village Hall, youth Centre, recreational facilities, three public houses, etc. However they are well used and do not have the capacity for more residents of the scale suggested.</p> <p>(SA 6) The inference of a good public transport service with half hourly frequency is completely wrong the frequency being roughly hourly to Oxford (with changes in the off peak) but stopping early evening and no Sunday services. The inference of possible journeys to Didcot and Reading is laughable they require travelling to Oxford and back out again. Local experience is that this option is not practical at all. Everyone drives to these locations.</p> <p>(SA 2 & 13) Chalgrove is a sustainable, safe, well behaved, cohesive well loved and close knit community. Increasing numbers by approx 10,000 people is hardly likely to improve that situation as is suggested. The airfield site would contribute nothing to the life of our community " quite the opposite. The Monument Business Park effect on employment for thousands of new residents will be minimal. There is almost full employment on the site and very little room for expansion even if the business world wanted it. SODC Policy is to locate Business and homes together. The site is a long way from Science Vale.</p> <p>(SA 3) The primary school and the surgery are at capacity. In the early phases of housing development the children could not be accommodated in Chalgrove as also the increased patients at the doctor's surgery. With regards to the school this is already a problem with the 200 homes required in the SHMA.</p> <p>(SA 8 & 11)The airfield being geographically higher already contributes to flooding in Chalgrove. It has several springs on it. In bad weather water off the airfield pours down Chapel Lane and Marley Lane with homes being flooded as it adds to the two waterways which pass through Chalgrove. In the past few years we have had 12 to 15 homes flooded on occasions. In addition parts of the B480 have suffered deep water and only passable with extreme care. Building on the Airfield Site due to run off from 3500</p>	<p>The concerns raised have been addressed above in the response from Chalgrove Parish council, to save repetition please see above</p>

Consultation Comments received for the Sustainability Appraisal PO1 June 2016		
Consultee	Response	SODC Response
	<p>homes will cause increased flooding in Chalgrove despite SUDS deployment which only last for 20 years which is similar to the build time which the HCA refers to.</p> <p>(SA 17) To say that there has been engagement with the local community in choosing Chalgrove as the Strategic Site is patently not true. This was all last minute stuff with even most SODC Councillors not knowing the Strategic Site until June 21 st 2016 long after the 10 th May full council meeting which approved the consultation document.</p>	

Consultee: Jam consult ltd on behalf of Summix Ltd and Pye Homes Ltd with regards to the proposed new settlement at Harrington and relates to the Preferred Options Sustainability Appraisal (Stage 3) of the Local Plan 2032, June 2016.	
Key Points raised	SA Response
2.0 The SA Process 2.1 Scoping Report, June 2014 2.1.1 Section 6 (paras 30-35) of the Scoping Report sets out the Sustainability Appraisal Framework (SAF). The SAF does not include any indicators or targets to show the key issues that will be used in the assessment. It	The Scoping Report was consulted on June 2014. No comments were received which suggested improvement to the Scoping Report. However a review will be undertaken of indicators or targets and these will be presented in the next stage of the SA process.

<p>Consultee: Jam consult ltd on behalf of Summix Ltd and Pye Homes Ltd with regards to the proposed new settlement at Harrington and relates to the Preferred Options Sustainability Appraisal (Stage 3) of the Local Plan 2032, June 2016.</p>	
<p>Key Points raised</p>	<p>SA Response</p>
<p>is therefore not clear what impacts will be measured or how their implementation will be monitored, contrary to the regulations. 2.1.2 As a consequence of the lack of indicators, key issues appear to be missing from the framework, for example:</p> <ul style="list-style-type: none"> • The affordability of housing provision • The capacity of infrastructure for existing and future demand - transport, energy, water, sewerage, waste, services. Infrastructure requirements have been included within Objective 1: Housing, which will make it difficult to see if the impacts of proposals are related to the housing provision or the infrastructure. Such impacts should be separated out for clarity. • Land use issues e.g. brownfield, greenfield, agricultural, green belt • Economic growth for areas outside Science Vale 	
<p>2.1.3 Objective 14 regarding development at Science Vale is too specific. The objective should be concerned with Economic Growth throughout the District with specific indicators for key areas of interest, where appropriate. The Council's identified Sustainability Challenges (p19) support this approach: 'There is a shortage of suitable business premises in appropriate locations. The Council is committed to supporting business growth in appropriate locations across the district (South Oxfordshire Corporate Plan 2012-2016)'</p>	<p>The SA objectives were consulted on through the Scoping Report June 2014, no comments were received that suggested any improvement to the SA Framework.</p> <p>This SA objective relates solely to Science Vale, SA Objective 14, 15 deals with Economic Growth throughout the District</p>
<p>2.1.4 The Sustainability Challenges identified from a review of the baseline information should have been used to inform the Sustainability Appraisal Framework, the links between the two are</p>	<p>The Scoping Report was consulted on June 2014, no comments were received that suggested any improvement to the SA Framework.</p>

<p>Consultee: Jam consult ltd on behalf of Summix Ltd and Pye Homes Ltd with regards to the proposed new settlement at Harrington and relates to the Preferred Options Sustainability Appraisal (Stage 3) of the Local Plan 2032, June 2016.</p>	
Key Points raised	SA Response
<p>weak. The lack of connection between the two processes shows an absence of consideration of the baseline data and evidence in the SA process, which is fundamental to its success.</p>	
<p>2.1.5 A compatibility matrix to show how the Sustainability Objectives perform against each other is provided [page 25, Table 5] but there is very limited explanation of the results and no explanation of how the incompatibility identified will be addressed in the SA.</p>	<p>The Scoping Report was consulted on June 2014, no comments were received that suggested any improvement to the Scoping Report.</p>
<p>2.1.6 In fact, paragraph 34 of the Scoping Report demonstrates that SODC is unclear of the purpose of the SA itself: “ Local plan sustainability appraisals should identify whether proposals have sought a ‘win win’ or compromise solution, in which case development meeting one objective will proceed in a way which helps to meet, to some extent at least, a conflicting objective. It is recognised that this may not always be feasible.” 2.1.7 The NPPG [001] is clear on the purpose of the SA process: “This process is an opportunity to consider ways by which the plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. By doing so, it can help make sure that the proposals in the plan are the most appropriate given the reasonable alternatives. It can be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met. Sustainability appraisal should be applied as an iterative process informing the development of the Local Plan.”</p>	<p>The Scoping Report was consulted on June 2014, no comments were received that suggested any improvement to the Scoping Report.</p> <p>The Council agrees with point: 2.1.9 The purpose of the SA is to identify the ‘likely significant effects’ in order to help develop and refine the Local Plan, including the identification of mitigation measures for any negative impacts and the potential to maximise positive effects. The SA will be used to inform the decision making process.</p>

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Key Points raised	SA Response
<p>2.1.8 Para 38 raises further concerns on SODC's approach and understanding of the SA process. "The SA will test each option on the extent to which it assists achievement of the sustainability objective. This will inform the choice of the preferred option but does not bind the council to choosing the highest scoring option and will aid in the identification of mitigation measures as appropriate."</p> <p>2.1.9 The purpose of the SA is to identify the 'likely significant effects' in order to help develop and refine the Local Plan, including the identification of mitigation measures for any negative impacts and the potential to maximise positive effects. SODC's emphasis implies that the SA results will not necessarily be used to inform the development of the Local Plan, contrary to guidance.</p>	
<p>2.2 Interim SA Report of the Refined Options, February 2015 2.2.1 The SA report fails to follow the requirements as identified in the regulations and guidance including:</p> <ul style="list-style-type: none"> • A non-technical summary of the information provided in the SA report • A summary of the baseline data used in the SA including any updates since the production of the Scoping Report • The cumulative effects of the draft Local Plan <p>2.2.1 2.2.1</p> <ul style="list-style-type: none"> • The reasons for the selection and rejection of options including any difficulties encountered 	<ul style="list-style-type: none"> • A final SA Report will be produced and will include all the information from each stage of the SA process and a non - technical summary will be produced to accompany the final SA Report. • The baseline data has been updated where appropriate. • The cumulative effects of the draft Local Plan will be included within the final SA Report. • The final SA Report will include the reasons for the selection and rejection of options including any difficulties encountered. This section will be finalised for the pre-submission stage of the Local Plan. • The results of the consultation process have been documented in the SA Report, further consultation responses will also be included in any future versions SA Report

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<p>Key Points raised</p>	<p>SA Response</p>
<ul style="list-style-type: none"> • The results of the consultation process and how the responses have been taken into account in the decision making of the SA and draft Local Plan • The proposals for monitoring of the significant environmental effects • Conclusions of the findings 	<ul style="list-style-type: none"> • The proposals for monitoring of the significant environmental effects will be included in the pre-submission stage of the SA Report and these will be finalised in the SA Statement following examination of the Local Plan. • Conclusions of the findings will be included in the pre-submission stage of the SA Report.
<p>2.2.3 The Refined Options SA report (pp 25-6) makes reference to the bodies that were consulted on the Scoping Report but fails to set out a summary of the responses, either in the main report or within the Appendices, contrary to the regulations [EU Directive 2001/42/EC: Article 8]. It is therefore impossible to know any issues of concern that were raised and how SODC has addressed such concerns, defeating the purpose of the consultation exercise.</p>	<p>Following consultation of the Scoping Report, no areas of concerns were raised. Only positive feedback was provided.</p>
<p>2.2.4 The results of the appraisal, as presented in the report, are very difficult to follow in order to undertake a cross-comparison and do not identify one scenario with potential overall positive effects. A summary table of the Housing Distribution Option results has been prepared by Jam and is set out overleaf (and at Appendix A to this report) in order to help understand the results.</p>	<p>A review and update of the SA Report will be undertaken to ensure that a cross-comparison is provided.</p>
<p>2.2.5 The SA report states (para 53 p33) that as a consequence of the appraisal, Option C has been dropped from consideration as it represents the least appropriate distribution option. The explanation given is as follows: "Option C: All in Science Vale. We are unlikely to pursue this distribution strategy. We are already committed to high levels of growth in and around Didcot and we need to be sure that whatever we additionally plan will be sustainable and deliverable. There are also other places within South Oxfordshire which could benefit from taking some of the additional housing growth (for example in terms of</p>	<p>Further detail on the preferred options will be include within the final SA Report.</p>

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<p>Key Points raised</p>	<p>SA Response</p>
<p>viability of shops and services) so we would not wish to restrict it to one part of the district.” 2.2.6 Whilst the above explanation may be correct, the findings of the SA do not show Option C to be the worst performer, raising doubts regarding how the SA has been undertaken and the transparency of the results. Furthermore, if the Council recognises that additional development in Science Vale would not be sustainable or deliverable, it would appear that Option C was not a ‘reasonable alternative’ and should therefore not have been included for consideration. [EU Directive 2001/42/EC: Article 5 and Annex 1; NPPF 152; NPPG 017,018]</p>	
<p>SODC Additional Housing Need 2.2.7 The SA sets out further options in para 57 for additional housing to accommodate the SODC’s anticipated additional need as set out in the SHMA. The Options considered are:</p> <ul style="list-style-type: none"> • A Additional figures on top of Core Strategy Figures: 3100 • B Additional figures on top of Core Strategy Figures: 3600 • C Additional figures on top of Core Strategy Figures: 5100 <p>An explanation of why these options were selected is not provided other than the anticipated need is between 3100 and 5100. The results do not explain which option performs the best or worst overall.</p>	<p>Further detail on why the options were selected and the preferred options will be include within the SA Report PO2.</p> <p>The SA has tested the following:</p> <ul style="list-style-type: none"> a) 3100 - 725 homes/annum – Lower end of OAN b) 3600 - 750 homes/annum - Committed economic growth c) 5100 - 825 homes/annum – Upper end of OAN d) 6500 - 925 homes/annum – Full affordable need
<p>2.2.8 The results are almost the same for each option. Option C differs slightly in that it is considered to have a very positive impact on the contribution to housing and a very negative impact upon transport. Given that no locations are considered for where this growth will go the purpose of this assessment is unclear. The results reflect this lack of information and are necessarily vague and generic.</p>	<p>The SA is required to assess all ‘reasonable alternatives’ at this stage the locations for growth are not determined, therefore the results are likely to be unclear. The SA is an iterative process, therefore as further assessments are carried out and decisions are made through-out the Plan making process the results will become clearer and these will be documented in the pre-submission SA Report.</p>
<p>Oxford City Unmet Housing Need</p>	<p>The SA Report has been updated to provide further information</p>

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<p>Key Points raised</p>	<p>SA Response</p>
<p>2.2.9 The SA report then addresses the unmet housing need for Oxford City. "There may be a number of options developed from this work and as they are developed they will be subject to the SA process, this information will be included in any future SA Reports.</p> <p>However, the Refined Options Local Plan states: "For this consultation, we have assumed that South Oxfordshire will need to consider planning for around 3,000 homes for Oxford in addition to the 3,600 extra homes for our own needs. Until the joint work with other Oxfordshire authorities is complete we do not know what the scale of any unmet need will be, although Oxford City Council stated in their response to our Issues and Scope consultation that we should be planning for between 5,000 and 15,000 new homes." Page 42</p> <p>2.2.10 The SA should therefore have assessed the need for a minimum of 6,600 homes rather than 5,100, although as has been shown above, without a preferred location the exercise is fairly meaningless. It is also unclear how the working assumption of 3,000 homes has been derived and why Oxford City's concerns have not been considered within the SA.</p> <p>2.2.11 This representation does not examine the accuracy of the housing need assessment, which is dealt with separately (see Frampton's representations August 2016). However, based on the figures provided, the SA does not show that all 'reasonable alternatives' have been considered in accordance with the regulations and guidance.</p> <p>2.2.12 The need to allow for the unmet need of neighbouring authorities is set out in the</p>	

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<p>Key Points raised</p>	<p>SA Response</p>
<p>NPPF under the Duty to Co-operate. Given that the Oxfordshire authorities operate in one housing market, the decision by SODC to ring fence this growth is not logical or appropriate. 2.2.13 The Refined Options Local Plan (p43) sets out possible approaches to accommodate the unmet housing need from Oxford City including: • An extension to Oxford in the Green Belt - such as Grenoble Road or Wick Farm • A new settlement - such as Harrington • Extensions to existing settlements The proposal for a new settlement at Chalgrove is not mentioned.</p>	
<p>Distribution of SODC Additional Housing 2.2.14 The SA goes on to assess the distribution of the additional housing need. Although the appraisal above showed that the SA was inconclusive on the amount of housing required, the Council states: “Following further evidence base studies including SA of the amount of additional housing required, we believe that planning for a further 3,600 homes will help provide the extra housing needed to support our business community and its plans for economic growth.” Para 60, p40. The evidence to support the above statement is not provided contrary to the regulations and guidance. [NPPG 001]</p>	<p>The SA Report has been updated to provide further information</p>
<p>2. 2.16 Paras 60-62 of the SA report sets out further options that have been considered regarding the distribution of housing including: A Allocating all sites in Science Vale B Allocating sites in the towns and larger villages C Allocating sites in the smaller villages 2.2.17 Given that the earlier part of the appraisal has already disregarded Option C: All in</p>	<p>The SA Report has been updated to provide further information</p>

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<p>Key Points raised</p>	<p>SA Response</p>
<p>Science Vale it is not clear why this option is being considered again. The lack of clarity in the SA is exacerbated by the fact that there is no explanation given for the selection and rejection of options.</p>	
<p>2.2.18 The failure to explain the reasons for the selection and rejection of alternatives is contrary to the regulations and guidance and demonstrates both an inadequate audit trail of how decisions have been made and a lack of transparency in the results. The absence of any consideration of the consultation responses to the Scoping Report adds further to the above failings.</p>	<p>The SA Report has been updated to provide further information Following consultation of the Scoping Report, no areas of concerns were raised. Only positive feedback was provided.</p>
<p>Other Allocations 2.2.19 The Refined Options Local Plan also sets out the need to allocate land for the following uses: • Employment - the need to allocate an additional 5 hectares of land • Retail - the need for new shopping provision These allocations have not been assessed in the SA Report.</p>	<p>The SA Report has been updated to provide further information</p>
<p>2.3 SA Report of the Preferred Options, June 2016 2.3.1 The SA Report again fails to follow the recommended structure as set out in the regulations and guidance including: • A non-technical summary of the information provided in the SA report • A summary of the baseline data used in the SA including any updates since the production of the Scoping Report • A summary of the cumulative effects of the draft Local Plan • The reasons for the selection and rejection of options including any difficulties encountered</p>	<p>A final SA Report will be produced and will include the all the information from each stage of the SA process and a non - technical summary will be produced to accompany the final SA Report.</p> <ul style="list-style-type: none"> • The baseline data has been updated where appropriate. • The cumulative effects of the draft Local Plan will be included within the final SA Report. • The final SA Report will include the reasons for the selection and rejection of options including any difficulties encountered. This section will be finalised for the pre-submission stage of the Local Plan. • The results of the consultation process have been documented, further consultation responses will also be

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<p>Key Points raised</p>	<p>SA Response</p>
<ul style="list-style-type: none"> • The results of the consultation process and how the responses have been taken into account in the decision making of the SA and draft Local Plan • The proposals for monitoring of the significant environmental effects • Conclusions of the findings 	<p>included in the SA Report in any future versions of the SA Report.</p> <ul style="list-style-type: none"> • The proposals for monitoring of the significant environmental effects will be included in the pre-submission stage of the SA Report and these will be finalised in the SA Statement following examination of the Local Plan. • Conclusions of the findings will be included in the pre-submission stage of the SA Report.
<p>SA Methodology 2.3.2 The SA framework has been updated to include appraisal questions in order to determine the effects of the options but still fails to include appropriate indicators and targets for future monitoring. The results of the SA also fail to reflect many of the questions in the revised SA framework or link to evidence available. Neutral impacts are not explained and the lack of impact can be difficult to understand. For example all sites score a neutral impact with regards to skills. A positive impact would seem more likely given the potential for new skills to be developed in construction alone. Split impacts have been used throughout the assessment, where an uncertain impact would often appear more appropriate.</p>	<p>A review will be undertaken of indicators or targets and these will be presented in the next stage of the SA process.</p>
<p>Consultation 2.3.3 The consultation responses from the previous stages of the SA and how they have influenced the SA and development of the plan are not included with the exception of a scant summary (para 45) and Appendix A - Table 10, which only includes summary comments from Oxfordshire County Council and Oxford City Council.</p>	<p>2.3.3 The Scoping Report was consulted on June 2014. No comments were received which suggested improvement to the Scoping Report. These will be included in the next stage of the SA process to provide clarity, but no actions are required. 2.3.4 Appendix A Table 10, summarises the key points received which are relevant to this stage of the SA Process. A number of potential sites for larger villages were included within the Refined Options SA Report 2015. Where appropriate, consultation responses</p>

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<p>Key Points raised</p>	<p>SA Response</p>
<p>2.3.4 The comments from SODC in Appendix A in response to Oxford County and City Councils state that the issues have been dealt with in the Preferred Options SA. The section/s within the SA where these issues are dealt with are not identified and are not apparent in the results.</p> <p>2.3.5 Comments from the Statutory Consultees and other stakeholders are not included, although the Introduction to the SA (p6) confirms that nearly 4,000 comments were received on the Issues and Scope consultation from almost 800 individuals and organisations and over 3,200 responses from 750 individual and organisations were received regarding the Refined Options consultations.</p> <p>2.3.6 The responses on the SA have not been collated into a separate report and the way they are structured on the website makes it almost impossible to decipher who said what as all the representations are split by individual question. A representation in its entirety (as submitted) cannot be viewed.</p> <p>2.3.7 The SA report has failed to show how the consultations have been taken into account in decision-making in accordance</p>	<p>for these sites will now be passed forward to neighbourhood planning groups. The Council is continuing to work with all stakeholders to inform the evidence base and decision making process.</p> <p>2.3.5 All comments received on the SA Report have been included in Appendix A table 10. The comments received on the Issues and Scope are documented within the Consultation Report [2015].</p> <p>2.3.6 Please see response 2.3.3 and 2.3.4 above.</p> <p>2.3.6 A Consultation Report is all that is required, a summary of key points made.</p> <p>2.3.7 Please see response 2.3.3 and 2.3.4 above.</p>
<p>The Local Plan Objectives 2.3.8 Table 5 (p32) compares the SA Objectives against the Local Plan Objectives. A summary of the results is provided on p33, which fails to inform the reader what the results mean as follows: "The 17 sustainability objectives that are used in the SA framework reflect the key issues in the district and the assessment raises a number of positive effects, negative effects and uncertain effects.</p>	<p>The SA Report has been updated to provide further information</p>

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<p>Key Points raised</p>	<p>SA Response</p>
<p>These negative and uncertain effects have become clearer through Stage B of the SA process where strategic and spatial alternatives have been assessed and mitigation measures to reduce negative effects have been proposed.”</p> <p>2.3.9 The purpose of the assessment is to check that the Local Plan objectives are in accordance with sustainability principles and identify any potential areas of conflict and areas of refinement that may be needed. The above summary fails to explain what the issues of concern are and how the assessment has informed the Plan making process.</p>	
<p>The Preferred Option</p> <p>2.3.10 The SA report sets out the Preferred Option at p41, which is a combination of Option A (Core Strategy approach) and elements of Option B (Science Vale and sustainable settlements) and Option D (all growth in a new settlement). An explanation of the reasons for making this decision is not given, contrary to the regulations and guidance [EU Directive 2001/42/EC: Article 5 and Annex 1; NPPF Para 152; NPPG 017, 018].</p>	<p>The SA Report has been updated to provide further information</p>
<p>How Many New Homes Options</p> <p>2.3.11 The SA report sets out the number of homes required on p50. The information provided on housing numbers is confusing. Para 39 states that based on the SHMA evidence, SODC need to plan for between 3,100 and 5,100 additional new homes between 2011-2031.</p> <p>2.3.12 The options given for housing numbers are, however, as follows:</p> <p>A 3100 (725 homes/annum) Lower end of OAN 14500 B 3600 (750 homes/annum) Committed economic growth OAN</p>	<p>The SA Report has been updated to provide further information</p>

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<p>Key Points raised</p>	<p>SA Response</p>
<p>C 5100 (825 homes/annum) Upper end of OAN D 6500 (965 homes/annum) Full affordable need No additional explanation is given on why the above options were selected and if other options were rejected, contrary to the regulations and guidance. No conclusions on the assessment of housing number options are provided. [EU Directive 2001/42/EC: Article 5 and Annex 1; NPPF Para 152; NPPG 017, 018]</p>	
<p>Oxford City Unmet Housing Need 2.3.13 This representation does not examine the accuracy of the housing need assessment, which is dealt with separately (see Framptons representations, August 2016). However, based on the figures provided, the SA does not show that all 'reasonable alternatives' have been considered in accordance with the regulations and guidance. [EU Directive 2001/42/EC: Article 5 and Annex 1; NPPF Para 152; NPPG 017, 018] 2.3.14 Para 44 sets out 3 new options for Oxford City's unmet housing need: 1 Do Nothing 2 3,750 new dwellings 3 5,000 new dwellings A summary of the reasons for selecting the above options is provided in this instance, however, the reasons given show that 2 of the options (1 and 3) are not 'reasonable alternatives' as they are not regarded as either realistic or deliverable. The choice of options would appear to show a manipulation of the information in order to support a predetermined decision on the preferred level of housing. The options should have included a range of options both above and below the provisional 3,750 figure of Option 2, determined by a review of the evidence available.</p>	<p>The SA Report has been updated to provide further information</p>

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<p>Key Points raised</p>	<p>SA Response</p>
<p>2.3.15 The SA continues to assess the requirement for Oxford City as a separate housing requirement, contrary to guidance and responses received to the consultations. An explanation of the reasons for this approach is not given.</p>	
<p>Strategic Allocation Assessment 2.3.16 Para 55 of the SA Report sets out the approach taken to the Strategic Allocation of at least 3,500 dwellings and the following options: • An urban extension to Oxford within the Oxford Green Belt • A new settlement • Extensions to existing settlements 2.3.17 Seven possible locations are considered in the SA as follows: 1 Chalgrove Airfield 2 Harrington (Junction 7/M40) 3 Culham Science Vale 4 Lower Elsfield 5 Wick Farm 6 Thornhill 7 Grenoble Road 2.3.18 The reasons for the selection and rejection of options are not given, contrary to the regulations and guidance [EU Directive 2001/42/EC: Article 5 and Annex 1; NPPF Para 152; NPPG 017, 018] The detailed matrices are set out in the Appendices. Appendix A: Table 7 sets out the results for six of the options with the exception of Culham Science Vale, which is dealt with separately in Appendix A: Table 9. In order to try and cross compare the results for all the options, Jam has prepared a table, which is attached overleaf and in Appendix C of this report.</p>	<p>The SA Report has been updated to provide further information</p>

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Key Points raised	SA Response
<p>2.3.19 Whilst the SA does not provide any explanation of the selection or rejection of the options, the Preferred Options Local Plan provides a summary of the reasons (pp 31-37). Options 3 to 7 have been dismissed from consideration as they all fall within the Green Belt and therefore do not meet the Council's preferred criteria. The criteria listed in the Local Plan include:</p> <ul style="list-style-type: none"> • To meet the requirement on a single strategic site • To be of a sufficient scale to provide the required infrastructure for the new housing • To be located outside the Green Belt or AONB <p>2.3.20 The Council's preferred criteria have not been identified within the SA. In addition, Options 3, 4 and 5 would not be able to provide the required 3,500 dwellings on one site. Option 3 would deliver 500 dwellings, 4 would deliver 1,440 dwellings and Option 5, 1,000 dwellings. If the Council's preferred criteria are used as the basis for selection or rejection, Options 3-7 cannot be considered 'reasonable alternatives' as they are unable to deliver the required housing provision in suitable locations. Alternative options should therefore have been considered.</p> <p>2.3.21 It is also unclear why the location of a site in the Green Belt is sufficient to dismiss an option out of hand. The SA results show that the performance of the sites within the Green Belt is very similar to those outside the Green Belt. Reasoned justification should be provided for the rejection of options with links to the evidence available.</p>	

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<p>Key Points raised</p>	<p>SA Response</p>
<p>2.3.22 Pages 33-37 of the Preferred Options Local Plan provide a more detailed explanation of the assessment of Chalgrove and Harrington Strategic Allocations, which is dealt with below (see Section 3).</p>	
<p>Evidence 2.3.23 The SA reports fail to demonstrate the use of credible and robust evidence in carrying out the assessments. The assessment for Harrington does not reflect the evidence submitted to the Council in April 2016. The inaccuracies in the assessment call into question the reliability of the results for the other strategic sites. 2.3.24 Key evidence documents at the County level that have not been referred to or referenced appropriately in the assessment include:</p> <ul style="list-style-type: none"> • Oxfordshire Growth Board Study • Urban Capacity of Oxford • Strategic Green Belt Study (jointly commissioned) • Transport modelling • Infrastructure Study and Delivery Framework • Water Cycle Strategy 	<p>The SA Report has been updated to provide further information</p>
<p>Proposed Policies 2.3.19 The Proposed Policies (para 57 of the SA) set out the policies that are being considered at this stage of the plan. SA has only been carried out on new policies to ensure that the assessment is proportionate. 2.3.20 The first and only mention that Chalgrove is the preferred Strategic Allocation is provided on p123. Again no reasons or justification for this decision are provided, contrary to the regulations and guidance.</p>	<p>2.3.19 N/A 2.3.20 The SA Report has been updated to provide further information 2.3.21 The SA is an iterative process, current assessments are high level. As further assessments are carried out, mitigation will be recommended and this will link to further policy development. 2.3.22 The SA is an iterative process, conclusions will be included within the pre-submission stage.</p>

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<p>Key Points raised</p>	<p>SA Response</p>
<p>2.3.21 Table 19 sets out the assessment of some of the proposed policies, which is extremely difficult to interpret as the full policy wording is not given and only a brief summary of the impacts is provided. The assessment fails to link to any evidence to support the results. It is therefore not known whether the results are justified or accurate.</p> <p>2.3.22 No conclusions are provided to the SA report it is therefore unclear what the key findings of the SA are and how they have informed the development of the Local Plan. The SA fails to demonstrate an integrated process [NPPG 0016].</p>	
<p>3.0 The Preferred Strategic Allocations</p> <p>3.1.1 The Preferred Local Plan identifies the Strategic Allocations of Chalgrove Airfield and Harrington as sites, which merit more detailed consideration. The SA of each site is dealt with in more detail below, however it should be noted that the Council's approach to the SA is flawed generally, as explained earlier in this report. A summary table of how all the Strategic Allocations perform is provided in Appendix C to this report.</p>	<p>The SA is an iterative process, the final SA Report will ensure that further detail is provided.</p>
<p>Chalgrove Airfield</p> <p>3.1.2 The commentary provided on pp33-35 of the Preferred Options Local Plan conflicts in some instances with the results of the SA. For example:</p> <ul style="list-style-type: none"> • Local Plan - The airfield is flat and largely free from constraints. There are no known archaeological or ecological constraints • SA - Areas of landscape on elevated ground and on the floor of the vale including the airfield site are visually exposed and new 	<p>The SA Report has been updated to provide further information</p>

<p>Consultee: Jam consult ltd on behalf of Summix Ltd and Pye Homes Ltd with regards to the proposed new settlement at Harrington and relates to the Preferred Options Sustainability Appraisal (Stage 3) of the Local Plan 2032, June 2016.</p>	
<p>Key Points raised</p>	<p>SA Response</p>
<p>development would be highly prominent unless closely associated with existing built form or well integrated within new landscape frameworks.</p> <p>SA - Chalgrove Battlefield lies between the hamlet of Warpsgrove and village of Chalgrove; therefore significant heritage constraints exist on the western edge of Chalgrove Airfields resulting in significant negative effects if development were to occur here without mitigation (see Framptons representations August 2016, Appendix E for further information)</p> <ul style="list-style-type: none"> • SA - No known biodiversity constraints are identified resulting in no impact to biodiversity constraints. However the mitigation states that a BAP phase 1 Survey should be carried out, indicating that the situation is actually unknown at present 	
<p>3.1.3 The negative impacts identified in the SA are not mentioned in the Local Plan commentary. For example access to services and travel both score a major negative impact because of the site's isolation. In particular, the negative impacts on Chalgrove Village, which does not have the capacity to support such a development; and the table of travel times in the Local Plan, which fails to include travel times by bus, which are extremely poor at nearly 1 hour to Oxford, are not mentioned.</p> <p>3.1.4 The SA also states in the assessment of the site against Sustainability Objective 1: Housing that: "there is uncertainty regarding the availability of the site from the land owner." This statement contradicts the commentary in the Local Plan, which states: "There is a high degree of confidence that the HCA would deliver housing on this site." p35</p>	<p>The SA Report has been updated to provide further information</p>

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<p>Key Points raised</p>	<p>SA Response</p>
<p>3.1.5 The Local Plan goes on to say at para 5.25 p 35 that initial proposals have been submitted to the Council by GVA on behalf of HCA that include the provision of 3,500 homes; 144 hectares; 10 ha of new employment land plus existing employment land; 10 ha for a new secondary school and leisure facilities; 20 ha of public green space and access to the wider countryside.</p> <p>3.1.6 The proposals referred to above cannot be found on the Council's website and are not referred to in the SA Reports, it is therefore impossible to verify if this information is correct. This approach demonstrates a lack of transparency and reference to evidence in the consideration of the options.</p>	<p>The SA Report has been updated to provide further information</p>
<p>Harrington (Junction 7/M40)</p> <p>3.1.7 The Council's commentary in the Local Plan gives the following reasons for not selecting Harrington as a Strategic Allocation: "Whilst the Harrington site has many benefits including its proximity to J7, the site is surrounded by several smaller villages with fewer facilities and is more constrained due to flood issues, ecology and access. In addition, its location directly adjacent to the M40 would create the possibility of a less sustainable commuter-based settlement."</p> <p>3.1.8 The submission made to the Council of the proposals at Harrington set out the constraints for the site and how they will be addressed in the development through design and suitable mitigation measures.</p> <p>3.1.9 The SA provides a misrepresentation of the proposals for the site, particularly with regard to the following issues, which all score a negative impact:</p> <ul style="list-style-type: none"> • Access to Services 	<p>Harrington (Junction 7/M40)</p> <p>3.1.7, 3.1.8, 3.1.9 The SA has been carried out on the baseline conditions of the site, mitigation recommendations have been identified, if the site is chosen for development, policies will be implemented to ensure that the mitigation is implemented. Therefore at this stage proposals that have been submitted for Harrington (Junction 7/M40) are not taken into account.</p>

Consultee: Jam consult ltd on behalf of Summix Ltd and Pye Homes Ltd with regards to the proposed new settlement at Harrington and relates to the Preferred Options Sustainability Appraisal (Stage 3) of the Local Plan 2032, June 2016.	
Key Points raised	SA Response
<ul style="list-style-type: none"> • Health & Well-being • Pollution • Travel & Access • Biodiversity • Flood Risk <p>3.1.9 The Council's SA has shown that Chalgrove is the worst performer with regards to travel and access, which contradicts the reasons given above for not selecting Harrington. The difference in reasoning between the Local Plan and SA shows that the findings of the SA cannot have been used to inform the Plan and that there has not been an integrated process, in conflict with the regulations and guidance [NPPG 006].</p> <p>3.1.9 An initial comparison of the Council's assessment of Harrington and Jam's assessment of the site, based on the evidence available, is provided at Appendix D to this report.</p>	

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Consultee	Comment	Response
Environment Agency	We would have no concerns with CR06 and CR07 being put forward for allocation in the plan. In regards to the other Crowmarsh 'other site' allocations we would not support CR03 and CR04 being allocated in the plan unless it was demonstrated that a Sequential Test had been carried out and this site had passed. If it passed the Sequential Test then we would expect the policy wording to commit to there being no built development in Flood Zones 2/3.	The SA Matrix for all the Crowmarsh sites has been updated to reflect these comments

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Environment Agency	It is very difficult to answer this question without having a clear map for each of the sites with boundaries clearly marked. We would not support any new or extension/intensification of sites in Flood Zones 2/3. The NPPF clearly states that caravans pitches should not located in areas of flood risk as the use is classed as highly vulnerable use. We are concerned to see that from initial review (without benefit of exact location) it appears that both Webbs Yard and Bucklands Paddock are near or within areas of Flood Zone 2/3.	These sites are not recommended to be included within the LP.
Environment Agency	Reference is made on page 12 of the Refined Options Consultation document to various policies being carried over from the existing core strategy. There will be a need to ensure that policies relating to the environment are updated/included in any new Local Plan document.	The Policies have been revised and are included within the PO2 LP.
Natural England	<p>CRO6, CRO 7</p> <p>Landscape Impact</p> <p>CRO6 and CRO7 are located within the Chilterns AONB. In line with paragraph 115 of the NPPF, great weight should be given to conserving landscape and scenic beauty in AONBs.</p> <p>In line with paragraph 116 of the NPPF, the council will need to determine whether the allocation of 105 houses within the AONB at Goring constitutes 'major development' and, if so, whether there are exceptional circumstances and a need for the allocation.</p> <p>The study recommended that development be contained in a smaller area of site CRO7. We note that the reduced scale of the site has not been included in the refined options CRO7 area, and advise that the scale of the site (without the reduction) may have an adverse impact on the character of the AONB. Any further quantification of the capacity of these sites will need to be informed by a detailed Landscape and Visual Impact Assessment (LVIA).</p> <p>Natural England advises the Council to liaise with the Chilterns AONB Board, and to make reference to their Management Plan. Their knowledge of the location and wider landscape setting should help to confirm whether or not the proposed allocations would impact significantly on the purposes of the AONB designation. They will also be able advise on whether the</p>	A review has been carried out for these sites and the mitigation recommendations include the requirement for a LVIA.

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	<p>proposed allocations accord with the aims and policies set out in the AONB management plan.</p> <p>It is noted that the landscape study suggests that 65 dwellings may be accommodated on CRO6. This is more than the 48 dwellings recommended for allocation in Crowmarsh Gifford. CRO6 is identified as having a medium/high landscape capacity for development, whereas CRO7 is identified as having medium/low landscape capacity. Therefore, Natural recommends that CRO6 be considered in preference to CRO7.</p>	
Natural England	<p>NET 1, NET 2 Landscape Impact</p> <p>NET 1 has not been included in the landscape capacity study. We therefore have no adequate basis for Natural England advice for this site. The study recommended that development be contained in a smaller area of the NET3. We note that the reduced scale of this site has not been included in the refined options NET3 area, and advise that the scale of the site (without the reduction) may have an adverse impact on the character of the AONB.</p> <p>Natural England advises the Council to liaise with the Chilterns AONB Board, and to make reference to their Management Plan. Their knowledge of the location and wider landscape setting should help to confirm whether or not the proposed allocations would impact significantly on the purposes of the AONB designation. They will also be able advise on whether the proposed allocations accord with the aims and policies set out in the AONB management plan.</p> <p>Internationally and Nationally Designated Sites</p> <p>NET1 is located within close proximity to the following designated sites:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Priest Hill SSSI <p>Any further assessment of these sites will need to identify potential impacts on the SSSI, which should factored into the decision making process.</p>	The SA has been updated to reflect these comments
Natural England	<p>Meeting Oxford's Housing Needs</p> <p>We note that several proposed locations are near to sensitive SSSIs. The 'Wick Farm Area' is in close proximity to Sidling's Copse and College Pond SSSI, and the 'J7 Area' is in close proximity to Spartum Fen SSSI. Any further assessment of these sites will need to identify potential</p>	Further assessments have been carried out for these potential growth areas and where consulted on in June 2016. The PO is These sites have not been taken forward

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	impacts on the SSSIs, and they should factored into the decision making process.	
Oxfordshire C.C	<p>Table 5 SA Summary of Key findings housing distribution options: A – H The section for SA in this table highlights that all options have potential to have a minor negative effect with regard the district's historic environment. This is not correct however as many of the options have the potential to contain archaeological sites of national importance and as such would require physical preservation as set out in the NPPF.</p> <p>An archaeological evaluation will be required on such sites in order that the significance of such sites can be assessed. Where this evaluation records sites of demonstrably equivalent significance to a designated site then these sites would need to be considered subject to the policies within the NPPF for designated sites (NPPF para 139) and substantial harm to such sites should be wholly exceptional (NPPF para 132). Development of such sites could therefore be a major negative effect.</p> <p>This assumption is repeated for tables 6 and 7. The impact of development of any sites shown to contain archaeological remains could therefore range from a minor negative effect to a major negative effect depending on the significance of the archaeological deposits identified. This should be reflected in the sustainability appraisal.</p>	<p>The following mitigation recommendations are included within the SA report :</p> <p>A predetermination archaeological desk-based assessment and evaluation should be undertaken to establish a suitable and appropriate level of mitigation if required.</p>
Oxfordshire C.C	<p>The following matters were not included in our strategic comments on the Refined Options. However, please ensure that when assessing site options you consider the safeguarding policies in the emerging new Minerals and Waste Local Plan.</p> <p>Culham Station There are sand and gravel resources in this area that may be covered by the mineral safeguarding policy in the emerging new Minerals and Waste Local Plan (Part 1 – Core Strategy policy M8).</p> <p>There is a waste transfer/recycling facility at Culham No. 1 site and a radioactive waste facility at the Culham JET site which are both proposed</p>	These comments have been included in the SA Report June 2016 Culham Sustainability Appraisal.

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	to be safeguarded for waste management use by the waste management site safeguarding policy in the emerging new Minerals and Waste Local Plan (Part 1 – Core Strategy policy W11)	
Oxford City	The City Council has a particular objection to the assessment against Objective 8 of Option F (focus development next to major urban areas).	It is necessary to assess a number of alternative options. Further evidence has now been produced to reflect these concerns and a number of strategic sites have been assessed through the SA process. Please see SA Report Preferred Options June 2016
Oxford City	It is therefore erroneous to conclude that Option F would result in major negative effects against this objective, whilst Options B, C and D would have major positive effects on the basis that these options “do take account of existing policy designations such as Green Belt and Areas of Outstanding Natural Beauty.” This analysis fundamentally misunderstands the purposes of the Green Belt, in confusing this with a landscape constraint, and exposes a significant flaw in the SA assessment. (This comment also applies to Appendix A Table 1.)	Further evidence has now been produced to reflect these concerns and a number of strategic sites have been assessed through the SA process. Please see SA Report Preferred Options June 2016
Oxford City	89. The City Council does not agree with the analysis in Table 5 that against Objective 6 (to improve travel choice and accessibility, reduce the need to travel by car and shorten the length and duration of journeys) all options would perform equally with the exception of Options E (Dispersal) and Option G (Raising densities). As evidenced earlier in this response (see Table 1), there are clear and undeniable benefits to Option F (Next to major urban areas) which would point to this option scoring higher than other options, given the shorter average journey lengths for people travelling to Oxford, and high levels of walking, cycling and public transport use, seen already in Oxford. Conversely Option D (All growth in a single new settlement) would be very likely to further encourage car use and longer journeys given such a settlement would primarily function as a satellite town. These conclusions should be adjusted to accord with the evidence on travel patterns in Oxfordshire. (This comment also applies to Appendix A Table 1.)	Further evidence has now been produced to reflect these concerns and a number of strategic sites have been assessed through the SA process. Please see SA Report Preferred Options June 2016

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Oxford City	90. Pages 58 and 59 refer to assessing options for the unmet Oxford housing need. It states in paragraph 59 that “there may be a number of options developed from this work and as they are developed they will be subject to the SA process, this information will be included in any future SA Reports.” The City Council notes that this is in spite of spatial options for allocating the Oxford unmet need have been set out on page 43 of the Refined Options Document, together with a stated (albeit too low) working assumption of planning for 3,000 homes to contribute to Oxford’s unmet need.	Unmet need has been addressed. Please see SA Report Preferred Options June 2016
Oxford City	91. The City Council suggested in its response on the Scope and Options consultation that, for the purposes of the SA, quanta of 5,000, 10,000 and 15,000 should be tested. An independently audited Oxford SHLAA estimates an Oxford capacity for housing over the period for around 10,200 homes assuming some Green Belt release within the City (albeit some Councils are challenging this figure). This is compared with an OAN for Oxford of 24,000-32,000 homes. Even though a set number hasn’t been agreed upon, this does not prevent different levels of growth being tested (as has been done for South Oxfordshire’s own housing need). The Refined Options document identifies a ‘working assumption’ for Oxford’s needs, clearly indicating that work has been done on scenarios for the Oxford unmet need.	Unmet need has been addressed. Please see SA Report Preferred Options June 2016
Oxford City	92. The Refined Options document identifies some approaches for meeting the Oxford unmet need which are suggested as: <ul style="list-style-type: none"> • Extension to Oxford in the Green Belt (Grenoble Road and Wick Farm) • A new settlement at Junction 7 of the M40, and • Extensions to new settlements. 	Further evidence has now been produced to reflect these concerns and a number of strategic sites have been assessed through the SA process. Please see SA Report Preferred Options June 2016
Oxford City	93. There is no clear reason given as to why these spatial options have not been assessed against the SA objectives. This is disappointing, given the City Council had been led to believe that a specific spatial option for an urban extension for Oxford would be SA’d.	Further evidence has now been produced to reflect these concerns and a number of strategic sites have been assessed through the SA process. Please see SA Report Preferred Options June 2016.
Oxford City	94. These are significant and unnecessary omissions which disregard the importance of contributing to Oxford’s unmet housing need as an integral part of the strategy. The City Council therefore requests that work is now	Further evidence has now been produced to reflect these concerns and a number of

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	done to undertake sustainability appraisal of Oxford unmet need options, and that this is done collaboratively with the City Council under the auspices of the Duty to Cooperate.	strategic sites have been assessed through the SA process. Unmet need has been addressed. Please see SA Report Preferred Options June 2016
English Heritage	As a general point, potential development sites, and their capacity, should be selected having full and proper regard to the potential nature and degree of impact on the significance of heritage assets, both designated and non-designated (information on which can be obtained from your Conservation Officer or the Historic Environment Record) , both on the actual site and in the locality within the setting of which the potential development site lies, in accordance with the consideration to be afforded to the conservation and enhancement of heritage assets required by the National Planning Policy Framework. In accordance with paragraph 170 of the National Planning Policy Framework, the location for development within Science Vale should be informed by the Oxfordshire Historic Landscape Character Assessment, currently underway (if the area of Science Vale has not yet been assessed, it may be possible for this to be prioritised for assessment - please contact Oxfordshire County Council or ourselves for further information).	SODC will continue to consult English Heritage and OCC on the development of the LP.
English Heritage	There are grade II listed stable just to the north of CRO6 and the grade II listed Meadow Cottage to the north-east of CRO7. Any development at these ends of these sites should respect the settings of these two buildings and this should be reflected in any policy setting design requirements for the development of these sites. Of the non short-listed sites, CRO3 contains four grade II listed buildings and lies opposite the Wallingford Conservation Area to the west. Should this site be taken forward at some point in time, the development should retain and respect the setting of these heritage assets.	The SA has been reviewed and information updated were appropriate
English Heritage	NET3 is adjacent to the Nettlebed Conservation Area at its eastern end. Any development at this end of the site should respect the setting of the	The SA has been reviewed and information updated were appropriate.

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	<p>Conservation Area and this should be reflected in any policy setting design requirements for the development of this site.</p> <p>Of the non short-listed sites, NET4 is also adjacent to the Conservation Area at its eastern end. Should this site be taken forward at some point in time, the development should respect the setting of the Area. NET5 includes the grade II listed Sue Ryder Home. Should this site be taken forward at some point in time, the development should retain and respect the setting of this heritage asset.</p>	
G. Bond	<p>'Hourly' bus services between Henley and Wallingford in one document have been transformed into 'hourly' services to Reading in another 'Sustainability' document's assessment. Having to connect via these towns is not the same as a direct service, which actually is much, much less frequent, via Nettlebed, for example. In this case information received via the Parish Council, is that the erstwhile operator has dropped the service and it is currently totally subsidised by the Council. This OK at present, but surely cannot be sustainable. Your documents need to be correct in such matters.</p>	<p>The SA has been reviewed and information updated where appropriate.</p>