

Policy & Programmes

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Listening Learning Leading



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Our reference: Bucks SA Scoping Report

27 January 2023

Dear Mr Broadley,

Sustainability Appraisal (SA) of the Local Plan for Buckinghamshire SA Scoping Report (draft for consultation)

Thank you for providing South Oxfordshire and Vale of White Horse District Councils with the opportunity to comment on your Draft SA Scoping Report.

Overall, we consider that your proposed approach to Sustainability Appraisal of the emerging Buckinghamshire Local Plan will provide an appropriate basis on which to assess the impact that policy and site options may have in the key areas you have identified.

Your Executive Summary usefully references possible changes to the way in which sustainability appraisal will be carried out (with the 'Levelling Up and Regeneration Bill' proposing a different regime focusing on the assessment of environmental outcomes) and we agree that, despite the uncertainty surrounding any future approach to sustainability appraisal, it is sensible to continue to scope out the key sustainability issues and objectives that your emerging policies and sites will need to be assessed against.

Draft Sustainability Appraisal Framework

We have reviewed Section 14 (SA Framework and Next Steps) of your scoping report and have the following comments to make:

- Whilst we note that your sustainability objectives are intentionally high level to allow for flexibility once the Buckinghamshire Local Plan scope and objectives have been established, it would be useful if paragraph 14.2 explained that SA is an iterative process and that future versions of the SA report will reflect any changes in legislation, national planning policy, latest evidence, direction of the Buckinghamshire Local Plan or emerging plans and site allocations of neighbouring authorities.

- *Communities and Health SA Objective* – This objective could be reworded and amalgamated with the Accessibility Objective for clarity/simplicity. For example, it could be amended to read:

‘To support the health and wellbeing of existing and new communities and reduce relative deprivation and inequalities, through delivery of (and the provision of improved access to) social, health and green infrastructure.’

- *Landscape SA Objective* – It would be helpful to include reference to the specific sustainability objective(s) which have close links to this landscape objective.

- *Transport SA Objective* – Could be reworded for clarity. For example:

‘Support the achievement of a modal switch from private car use to sustainable transport modes and a significant reduction in traffic congestion’.

- Paragraphs 14.6 and 14.7 – These would also benefit from some rewording, to explain more clearly how the SA framework will be used to assess the potential impact of emerging policies and site allocations against the list of SA objectives and to assess cumulative impacts, where applicable.
- In future iterations of the SA report, it would be helpful to clarify how timeframes of significant impacts (eg long term, short term, temporary) will be applied, to ensure there is certainty over the effects and consistency with how impacts are assessed.
- Government’s PPG on *Strategic Environmental Assessment and Sustainability Appraisal* includes a helpful [flowchart of the SA process](#) identifying the key stages of SA and how these relate to Local Plan preparation. Stage B (Developing and refining alternatives and assessing effects) includes a requirement to consider ways of mitigating any identified adverse impacts and maximising beneficial effects. This task needs adding to your proposed SA methodology, so that it can be taken into account when the council is determining its preferred policy and site options for the Local Plan.

Other Comments

As you may know, South Oxfordshire and Vale of White Horse District Councils are working together to produce a new Joint Local Plan which will guide development in the districts to 2041. The timetable for producing the Joint Local Plan is set out in the councils’ [Joint Local Development Scheme](#) (adopted December 2022). You will see that the timetables for producing our Joint Local Plan and the Buckinghamshire Local Plan overlap. It will, therefore, be important to maintain ongoing engagement between the authorities, to ensure that any cumulative and/or cross-boundary impacts are properly assessed through the respective SA processes.

You may also find it helpful to refer to our map of neighbourhood plans in South Oxfordshire which shows where plans have been (or are currently being) produced and the status they have reached. There are a number of made NDPs that border Buckinghamshire, including the Thame Neighbourhood Plan (currently under review) and there are close synergies between the town of Thame and the expanding village of Haddenham, which may need to be reflected in your SA.

Under Section 12 (Transport), we advise that the Oxfordshire Local Transport and Connectivity Plan (adopted July 2022) should be added to Table 12.1 (Key Sources of Evidence).

At South and Vale, we are committed to working collaboratively with our neighbouring authorities. Thank you again for the opportunity to review your SA Scoping Report and we hope that a positive working relationship between the councils continues as we progress with our local plan preparation.

Yours sincerely,

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Principal Planning Policy Officer
South Oxfordshire and Vale of White Horse District Councils