

Sustainability Appraisal (SA) of the Vale of White Horse District Local Plan 2031: Part 2

SA Report Addendum

January 2019

REVISION SCHEDULE					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	Jan 2019	SA Report Addendum published alongside proposed main modifications to the Vale of White Horse District Local Plan Part 2 (LPP2)	Mark Fessey Associate	Steven Smith Technical Director	Steven Smith Technical Director

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NON-TECHNICAL SUMMARY

Introduction

Background

Vale of White Horse (VoWH) District Council submitted the Local Plan 2031 Part 2: Detailed Policies and Additional Sites to the Secretary of State on Friday 23 February 2018 for independent examination. One of the associated documents submitted alongside the Plan was the Sustainability Appraisal (SA) Report.

Examination hearings were held in summer 2018, overseen by an appointed Planning Inspector. Subsequently, in December 2018, the Inspector sent the Council a list of proposed main modifications (henceforth 'proposed modifications') to the submitted plan. Proposed modifications are now published for consultation.

This SA Report Addendum

The aim of this SA Report Addendum is essentially to present an appraisal of the proposed modifications, with a view to informing the current consultation.

In addition to presenting an appraisal of the proposed modifications, this report presents an appraisal of the 'the Plan as modified', thereby updating the appraisal findings presented within the SA Report.

Screening proposed modifications

The first task is to consider proposed modifications in turn, with a view to identifying those that need to be given detailed consideration, through appraisal. The conclusion is a need to subject 12 of the 29 proposed modifications to appraisal, namely: MM2; MM4; MM6; MM10; MM18; MM19; MM20; MM21; MM23; MM24; MM27; and MM28.

Appraisal findings

The main task is to appraise the screened-in proposed modifications against the SA framework, and also discuss the 'submission plan plus proposed modifications' (thereby updating the SA Report).

The appraisal is structured under 11 sustainability topic headings, with the following overall conclusions -

Appraisal of proposed modifications

The appraisal has focused primarily on the proposed changes to the spatial strategy, namely the proposal to delete the 1,000 home Harwell Campus allocation and also delete references to growth opportunity at Dalton Barracks beyond the plan period (consequentially removing less land from the Green Belt; also of note is the deletion of reference to providing a link between Dalton Barracks and the Lodge Hill Park and Ride site). Both proposals are found to perform well in respect of 'landscape' objectives, but do give rise to tensions in certain respects, most notably in terms of 'health' (as the Dalton Barracks proposed modification removes, or at least defers, the opportunity to deliver a new country park) and 'the economy' (as the deletion of the Harwell Campus allocation is, on balance, considered to conflict with objectives for expanding the role of the Campus within Science Vale, and the national economy). Other proposed modifications generally perform well, in particular the proposed new Core Policy 15c: Grove Comprehensive Development Framework, which is supportive of several sustainability objectives.

Appraisal of the submission plan plus proposed modifications

The overall conclusions presented within the 2017 SA Report were as follows:

“The appraisal finds the Publication Plan to perform well in terms of the majority of objectives, with ‘significant positive effects’ predicted in terms of: ‘Housing’ (as objectively assessed housing needs should be met), ‘Services and Facilities’ (given an expectation that the proposed Dalton Barracks scheme will lead to delivery of a new secondary school) and ‘the Economy’ (given the proposed high growth strategy within Science Vale). No ‘significant negative effects’ are predicted; however, issues/uncertainties are highlighted in respect of: ‘Pollution’ (given a risk of worsened air quality within the Marcham AQMA; and ‘Climate change adaptation’ (given some issues in respect of Wastewater Treatment Works capacity). A number of effects are dependent on the nature of the scheme at Dalton Barracks, given the site’s potential capacity.”

The plan plus proposed modifications performs less positively in respect of ‘the economy’; however, the plan does now perform better in ‘landscape’ terms. Conclusions reached within the SA Report in respect of the other nine sustainability topic headings broadly hold true for the plan plus proposed modifications.

Next steps

The next step is for the Inspector to consider the representations raised as part of the consultation, alongside this SA Report Addendum, before deciding whether he is in a position to write his report on the Plan’s soundness.

Assuming that the Inspector is able to find the Plan (as modified) to be ‘sound’, it will then be formally adopted by the Council. At the time of adoption an ‘SA Statement’ will be published that explains the process of plan-making / SA in full and presents ‘measures decided concerning monitoring’.

1 INTRODUCTION

1.1 Background

1.1.1 Vale of White Horse (VoWH) District Council submitted the Local Plan 2031 Part 2: Detailed Policies and Additional Sites to the Secretary of State on Friday 23 February 2018 for independent examination. One of the associated documents submitted alongside the Plan was the Sustainability Appraisal (SA) Report.

1.1.2 Examination hearings were held in summer 2018, overseen by an appointed Planning Inspector. Subsequently, in December 2018, the Inspector sent the Council a list of proposed main modifications (henceforth 'proposed modifications') to the submitted plan.¹ Proposed modifications are now published for consultation.

1.2 This SA Report Addendum

1.2.1 The aim of this SA Report Addendum is essentially to present an appraisal of the proposed modifications, with a view to informing the current consultation.

1.2.2 In addition to presenting an appraisal of the proposed modifications, this report presents an appraisal of 'the Plan as modified', thereby updating the appraisal findings presented within the SA Report.

1.2.3 It is important to emphasise that this is an *addendum* to the SA Report. It seeks to present information relevant to the current stage in plan-making, and does not attempt to present all of the information required of the SA Report.

Reasonable alternatives?

1.2.4 As required by Regulations,² the SA Report presents detailed information in relation to reasonable alternatives, in that it presents an appraisal of reasonable alternatives and also 'an outline of the reasons for selecting the alternatives dealt with'. More specifically, the SA Report presents an appraisal of reasonable alternative approaches to the allocation of land for housing through LPP2, or 'housing growth alternatives'.

1.2.5 When developing proposed modifications the Council was not presented with a need to appraise alternatives, given alternatives appraisal work completed prior to submission. As such, this report does not contain information on alternatives.

¹ Proposed 'additional' modifications are also published alongside the main modifications, but are not a focus of this report.

² The Environmental Assessment of Plans and Programmes Regulations (2004)

2 SCREENING PROPOSED MODIFICATIONS

2.1 Introduction

2.1.1 The first task is to consider proposed modifications in turn, with a view to identifying those that need to be given detailed consideration, through appraisal (see Chapter 3).

2.1.2 This chapter gives consideration to Local Plan policies in turn.

2.2 Screening conclusions

2.2.1 Conclusions are presented in **Table 2.1**. In summary, there is a need to subject 12 of the 29 proposed modifications to appraisal, namely: MM2; MM4; MM6; MM10; MM18; MM19; MM20; MM21; MM23; MM24; MM27; and MM28.

Table 2.1: Screening conclusions

Policy	Proposed Main Modification	Is there a need to examine further through appraisal?
Core Policy 4a: Meeting our Housing Needs	MM1	No - factual update to supporting text discussion in respect of meeting needs for Gypsies, Travellers and Travelling Showpeople.
	MM2	Yes - change to housing growth strategy, namely deleting Harwell Campus and removing references to Dalton Barracks delivering additional housing beyond the plan period.
Core Policy 8a: Additional Site Allocations for Abingdon-on-Thames and Oxford Fringe Sub-Area	MM3	No - consequential to MM2.
Core Policy 8b: Dalton Barracks Supporting text, Para 2.49 to 2.65	MM4	Yes - change to Dalton Barracks policy (partially consequential to MM2/MM3)
Core Policy 13a: Oxford Green Belt	MM5	No - consequential change following MM2/MM3/MM4
Core Policy 12a: Safeguarding of Land for Strategic Highway Improvements within the Abingdon-on-Thames and Oxford Fringe Sub-Area	MM6	Yes - change to infrastructure safeguarding policy, namely additional reference to an upgraded footpath between Shippon and Abingdon, and deletion of reference to a link between Dalton Barracks and Lodge Hill Park and Ride.
Core Policy 14a: Strategic Water Storage Reservoirs	MM7	No - minor change to explain that safeguarding of the reservoir site will end if it transpires that there is no realistic prospect of delivery
Core Policy 15a: Additional Site Allocations for South East Vale Sub-Area	MM8	No - consequential to MM2.

Policy	Proposed Main Modification	Is there a need to examine further through appraisal?
Core Policy 15b: Harwell Campus Comprehensive Development Framework	MM9	No - consequential change following MM2/MM3
Core Policy 15c: Grove Comprehensive Development Framework	MM10	Yes - new policy
Core Policy 18a: Safeguarding of Land for Strategic Highway Improvements within the South-East Vale Sub-Area	MM11	No - additional scheme referenced (Cinder Track Cycle Improvements) of limited strategic significance.
Core Policy 19a: Reopening of Grove Railway Station	MM12	No - clarification regarding options
Core Policy 20a: Housing Supply for Western Vale Sub-Area	MM13	No - consequential change following MM2/MM3
Development Policy 1: Self and Custom Build	MM14	No - minor changes to improve clarity; unlikely to affect the range of sites where self/custom build is supported.
Development Policy 2: Space Standards	MM15	No - minor changes to wording to aid clarity
Development Policy 5: Replacement Dwellings in the Open Countryside	MM16	No - any implications of requiring “equal or greater benefits” as opposed to “greater benefits” will be minor.
Development Policy 13e: Local Shopping Centres	MM17	No - this is a factual update to refer to an additional local shopping centre (Grovelands at Grove).
Development Policy 19: Lorries and Roadside Services	MM18	Yes - notable change to extent of designation
Development Policy 29: Settlement Character and Gaps	MM19	Yes - notable change to policy
Development Policy 30: Watercourses	MM20	Yes - notable change to supporting text
Development Policy 36: Heritage Assets	MM21	Yes - notable change to policy
Development Policy 38: Listed Buildings	MM22	No - primarily a re-arranging of the policy text.

Policy	Proposed Main Modification	Is there a need to examine further through appraisal?
Development Policy 39: Archaeology and Scheduled Monuments	MM23	Yes - notable change to policy
Appendix A:Site Development Templates (all)	MM24	Yes - notable change to development templates
Appendix A:Site Development Templates (Harwell Campus)	MM25	No - consequential change following MM2/MM3
Appendix A: Site Development Templates (Utilities)	MM26	No - minor change regarding the approach to required sewage upgrades at certain sites.
Appendix A: Site Development Template (Dalton Barracks)	MM27	Yes - notable change to development template
Appendix A: Site Development Templates (East of Kingston Bagpuize with Southmoor, within Fyfield and Tubney Parish)	MM28	Yes - notable change to development template
Appendix C	MM29	No - new map showing local shopping centres

3 APPRAISING PROPOSED MODIFICATIONS

- 3.1.1 This chapter presents an appraisal of the screened-in proposed modifications, and also discusses the 'submission plan plus proposed modifications' (thereby updating the SA Report).
- 3.1.2 The appraisal is structured under the 11 sustainability topics identified through SA scoping (and used to structure the appraisal findings within the SA Report).

3.2 Homes

Appraisal of proposed modifications

- 3.2.1 **MM2** proposes deletion of the 1,000 home allocation at Harwell Campus, reducing the number of homes provided at LPP2 allocations from 3,420 to 2,420. However, the housing land supply position remains robust, both at the District and South East Vale scales, particularly once account is taken of the latest (March 2018) monitoring figures, which show that the number of homes delivered, or set to be delivered through 'completions and commitments' is higher than was thought to be the case at the time of submission (which reflected the findings of March 2017 monitoring data). Focusing on the district-scale: the submission plan proposed a housing land supply figure (24,536) 8% above the housing requirement (22,760); whilst the latest situation - having accounted for removal of the Harwell Campus allocation, latest understanding of completions/commitments and also the proposal to reduce the windfall assumption figure from 1,110 to 1,000 - is that the Local Plan will provide for a housing land supply figure (25,359) 11.4% above the housing requirement. A 'buffer' over-and-above the housing requirement is supported, from a 'homes' perspective, given the likelihood of delays to delivery at one or more sites.

- 3.2.2 Having made these points, certain concerns do remain regarding the deletion of the Harwell Campus allocation, from a 'homes' perspective, noting the following from the SA Report:

"... provision for 1,000 homes at Harwell Campus... is supported on the basis that this will involve addressing specific housing needs. A survey of existing Campus organisations, undertaken by CBRE for the Harwell Campus Partnership, has shown that there is predisposition towards social / community clustering among the Campus workforce."

- 3.2.3 MM2 also proposes deletion of references to growth opportunity at Dalton Barracks beyond the plan period, and consequentially less land is removed from the Green Belt. However, it is difficult to suggest any significant implications for the achievement of 'homes' related sustainability objectives, as there are no implications for housing land supply / meeting the housing requirement, i.e. the site will still deliver 1,200 homes within the plan period, as per the submission plan. There is also no reason to suggest that the proportion of affordable homes that can viably be delivered will be reduced. Whilst early confirmation of further growth potential beyond the plan period (2031), or at least an indication, might be preferable from a 'homes' perspective, in practice it is not clear that much, if anything, is lost by revisiting this matter through a future Local Plan.

Appraisal of the submission plan plus proposed modifications

- 3.2.4 The SA Report concluded the following in respect of the submission plan -

"The LPP2 spatial strategy performs well, in that the quantum and distribution of homes should ensure that housing needs are met at various scales (Oxfordshire Housing Market Area, Vale of White Horse District and specific areas / settlements), and help to ensure a robust housing trajectory across the plan period. Certainty regarding deliverability of Dalton Barracks has increased considerably since the Preferred Options Stage; in addition to this, the Council is committed to the preparation of Supplementary Planning Document (SPD) to aid comprehensive masterplanning and delivery of the site."

The housing focused Development Policies perform well, and should appropriately compliment the Core Policies. In particular, detail is added in support of Core Policy 22 (Housing Mix) and Core Policy 26 (Accommodating Current and Future Needs of an Ageing Population). There is also a need to consider the effect of all other proposed Development Policies, in that requirements on developers can affect viability and in turn rates of housing delivery; however, a Viability Assessment has been completed, and determined that the effect of Development Policies in combination will not be to overly burden the development industry.

In conclusion, the Publication Plan is predicted to result in significant positive effects.”

3.2.5 This conclusion broadly **holds true** for ‘the submission plan as modified’.

3.3 Services and facilities

Appraisal of proposed modifications

3.3.1 **MM2** proposes deletion of the 1,000 home allocation at Harwell Campus; however, this has limited implications for the achievement of ‘services and facilities’ objectives. The scheme would have delivered a primary school and other services/facilities; however, the school would have served local residents only, and the current offer at Harwell Campus is suited to the existing resident and working population.

3.3.2 **MM2** also proposes deletion of references to growth opportunity at Dalton Barracks beyond the plan period, and consequentially less land is removed from the Green Belt. Related to this are adjustments to references to education provision within Core Policy 8b (Dalton Barracks Strategic Allocation) (**MM4**) and deletion of reference to providing a secondary school on-site from the Dalton Barracks Site Development Template (**MM27**). This does give rise to certain concerns in respect of ‘services and facilities’ as the SA Report did support the proposal to deliver a new secondary school in this location; however, the requirement (from the submitted Dalton Barracks Development Template) was only ever for: *“Contributions... for a new secondary school which will be required to accommodate growth **beyond 2031** and should be incorporated with the masterplanning for this site”* [emphasis added]. The intention was not that a new secondary school should be delivered in the shorter term to meet any urgent need in the Abingdon area. As such, it is not clear that a problem is created by deferring consideration of further growth at Dalton Barracks, and with it the potential for a new secondary school, to a future Local Plan process (at which time there may or may not still be a need for a new secondary school in the Abingdon area, noting that there are potential alternative sites where delivery might be accommodated).

3.3.3 Also of note is **MM10**, which proposes a new policy, namely Core Policy 15c: Grove Comprehensive Development Framework. The policy includes a focus on *“understanding the cumulative infrastructure requirements for Grove, taking account of existing and future needs”*. This is an important policy, noting the following statement made within the SA Report:

“... LPP2 allocations will impact in-combination with LPP1 allocations and other commitments... Issues/impacts include, for example... the effect of the proposed North West of Grove allocation, for example, is considered in-combination with commitments in excess of 5,000 homes at Wantage/Grove.”

3.3.4 Finally of note are the positive implications of **MM28**, which requires that a new local centre should be delivered as part of the East of Kingston Bagpuize scheme if viable, as opposed to the previous requirement to “consider the option of a local centre.

Appraisal of the submission plan plus proposed modifications

3.3.5 The SA Report concluded the following in respect of the submission plan -

“The LPP2 spatial strategy performs well, in that development is directed to sites/locations where there should be good potential to support accessibility to services and facilities, and deliver new community facilities. Most notably, it is proposed that the Dalton Barracks scheme should ultimately deliver a new secondary school, and three new primary schools, thereby addressing existing issues of capacity constraint.

The community facilities and retail centre focused Development Policies perform well, and should appropriately compliment the Core Policies. In particular, detail is added in support of Core Policy 7 (Providing Supporting Infrastructure and Services) and Core Policy 32 (Retail Development and other Main Town Centre Uses).

In conclusion, significant positive effects are predicted, particularly given support for a new secondary school.”

3.3.6 This conclusion **broadly holds true** for ‘the submission plan as modified’. The plan will not provide for delivery of a new secondary school at Dalton Barracks; however, as discussed, given that the submission proposal was in fact only to deliver a secondary school post 2031, it is not thought that the proposed modification has any significant bearing for secondary school capacity in the Abingdon area.

3.4 Movement

Appraisal of proposed modifications

3.4.1 **MM2** proposes deletion of the 1,000 home allocation at Harwell Campus, which represents something of an opportunity missed, from a ‘movement’ perspective. The SA Report stated the following regarding the performance of the site in ‘movement’ terms:

“OCC were broadly supportive, through the 2017 Preferred Options consultation, including on the basis that: the scheme would “provide homes close to jobs, supporting growth of this nationally and locally important employment site”; and residential development will lead to demand for bus services throughout the day and “contribute to making 4 buses per hour between Oxford and Harwell commercially viable in the long term.” Four buses per hour would equate to an excellent service; however, it is noted that the site is beyond 400m of the existing route. The site also benefits from direct access to National Cycle Network route 544 passes through the site, linking to Didcot and Wantage (improvements required). Finally, it is noted that Harwell Campus performs well as a location for major growth within the Science Vale, from a perspective of wishing to avoid worsened traffic congestion at the A34/A4130 Milton Interchange, and on the A34 itself. This is because the new north-facing slips at the Chilton Interchange will provide an alternative point of access onto the A34; and the new Harwell Link Road will provide an alternative route to Didcot.”

3.4.2 **MM2** also proposes deletion of references to growth opportunity at Dalton Barracks beyond the plan period, whilst **MM6** removes references to “Provision for a public transport and cycle link between Dalton Barracks and the Lodge Hill Park and Ride site”. The proposal to support a smaller scheme that will not be able to viably support the same level of services/facilities as a larger scheme represents something of an opportunity missed, in ‘movement’ terms, as does deletion of the proposal to safeguard land for the new route to Lodge Hill Park and Ride. However, on the other hand, the SA Report highlighted concerns regarding the performance of this site for housing growth, from a ‘movement’ perspective - see para 10.4.6 - noting that the site does not lie directly on a strategic transport corridor. As such, it is arguably appropriate to support a smaller scheme. It is also important to note that Evaluation of Transport Impacts (ETI) work completed prior to submission did only examine the transport implications of a 1,200 home scheme, such that the transport impacts of a larger scheme in the longer term, particularly in respect of congestion on the A34, remain undetermined (albeit the potential to model transport impacts so far into the future is inherently challenging).

- 3.4.3 Also of note are the positive implications of the following proposed modifications:
- **MM10** - proposes a new policy, namely Core Policy 15c: Grove Comprehensive Development Framework. The policy requires “exploring opportunities to maximise sustainable linkages between the existing settlement, and the adjacent strategic site allocations; and understanding how future growth should maximise opportunities for enhanced public transport connections, including a future railway station at Grove.”
 - **MM6** - adds a new infrastructure scheme to those listed under Core Policy 12a (Safeguarding of Land for Strategic Highways Improvements within the Abingdon-on-Thames and Oxford Fringe Sub-Area), namely an upgraded footpath between Shippon and Abingdon.
 - **MM18** - deletes a policy map associated with Development Policy 19 (Lorries and Roadside Services). The effect is to retain the full extent of the land safeguarded through LPP1 for a ‘lorries and roadside services’ scheme at Milton Interchange, as opposed to reducing the extent of the safeguarded land. This is a positive step, from a ‘movement’ perspective.
 - **MM27** and **MM28** - add the same requirement to the Dalton Barracks and East of Kingston Bagpuize allocation ‘development templates’ respectively. Specifically, the proposal is to require that: “the occupation of dwellings on the site will not begin prior to the completion of the upgrade to Frilford junction unless an alternative phasing plan is agreed with the county council.”

Appraisal of the submission plan plus proposed modifications

- 3.4.4 The SA Report concluded the following in respect of the submission plan -

“The proposed package of site allocations at this Publication stage is an improvement on that proposed at the Preferred Options stage, as there is a significantly reduced focus of growth at Marcham. All sites are broadly supported from a transport perspective (even the small site at South East Marcham, recognising that it relates well to the village centre and the A415, with its cycle route to Abingdon-on-Thames); however, it remains the case that a spatial strategy that is preferable, from a transport perspective, can be envisaged. Specifically, such a strategy would involve significant release of land from the Green Belt, in close proximity to Oxford.

The ‘transport’ focused Development Policies perform well, and should appropriately compliment the Core Policies. In particular, detail is added in support of Core Policies 33-36. A number of other policies also have positive implications for ‘movement’ objectives, including those that relate to retail / town centres, and those that relate to green infrastructure.

In conclusion, whilst the Publication Plan performs well, it is not possible to predict significant positive effects, recognising that Evaluation of Transport Impacts (ETI) serves to indicate that traffic congestion will worsen, in comparison to baseline (which includes LPP1 allocations). Mitigation has been identified to minimise the impact.”

- 3.4.5 This conclusion broadly **holds true** for ‘the submission plan as modified’, noting that the ETI work assumed delivery of a 1,200 homes scheme at Dalton Barracks, and did not assume delivery of a new link from Dalton Barracks to Lodge Hill Park and Ride.

3.5 Health

Appraisal of proposed modifications

- 3.5.1 **MM2** proposes deletion of the 1,000 home allocation at Harwell Campus; however, this has limited implications for the achievement of ‘health’ objectives. There would have been the potential to ensure good access to greenspace and excellent potential to walk and cycle to employment; however, other locations might feasibly give rise to similar opportunity.

3.5.2 MM2 also proposes deletion of references to growth opportunity at Dalton Barracks beyond the plan period, whilst **MM4** removes reference to provision of an 80 ha country park, instead now proposing a more modest requirement for 30 ha of parkland, and **MM6** removes references to “Provision for a public transport and cycle link between Dalton Barracks and the Lodge Hill Park and Ride site”. Not delivering a country park does represent an opportunity missed, from a ‘health’ perspective; however, the new proposal is to provide 30ha of parkland, more than the 22ha identified as necessary by the Habitats Regulations Assessment (HRA) in order to provide Suitable Alternative Natural Greenspace, SANG. Furthermore, there will be the opportunity to reconsider the possibility of a new country park through a future Local Plan process (recognising that any additional growth would necessitate additional SANG). Also, a scheme that is smaller in scale, and without the opportunity to cycle along a dedicated route to Lodge Hill Park and Ride (it might be anticipated that any route would have included a cycle lane) also represents something of an opportunity missed, in respect of supporting walking/cycling - see discussion at paragraph 10.5.2 of the SA Report.

3.5.3 Also of note are the positive implications of **MM24**, which proposes that all site allocation ‘development templates’ should require: “a health impact assessment that identifies and takes account of the health status and needs in the area and provides information about how to improve health and wellbeing.”

Appraisal of the submission plan plus proposed modifications

3.5.4 The SA Report concluded the following in respect of the submission plan -

“The spatial strategy performs well, in the sense that allocation of Dalton Barracks should lead to delivery of a new Country Park.

The Development Policies perform well, and should appropriately compliment the Core Policies, which seeks to provide for good health through Core Policy 37 (Design and Local Distinctiveness), Core Policy 45 (Green Infrastructure) and the sustainable transport policies.

In conclusion, the Publication Plan performs well; however, it is not clear that there is the potential to conclude significant positive effects, recognising the wide ranging nature of health determinants.”

3.5.5 This conclusion **no longer holds true** for ‘the submission plan as modified’, given that the plan will not provide for a new country park, albeit it is noted that the new requirement for health impact assessments is a notable ‘positive’ associated with the proposed modifications.

3.6 Inequality and exclusion

Appraisal of proposed modifications

3.6.1 **MM2** proposes deletion of the 1,000 home allocation at Harwell Campus, and also deletion of references to growth opportunity at Dalton Barracks beyond the plan period; however, this does not lead to any implications for the achievement of ‘inequality and exclusion’ objectives. Neither location is in proximity to an area of relative deprivation, nor is there any reason to suggest that growth at either location would be supportive of addressing issues being faced by any groups with protected characteristics under the Equalities Act.

Appraisal of the submission plan plus proposed modifications

3.6.2 The SA Report concluded the following in respect of the submission plan -

“The spatial strategy has few implications for the achievement of ‘inequality and exclusion objectives’, with affordable housing provision for Oxford being a consideration. However, the Development Policies will play an important role in this respect, in particular through their support for addressing specialist housing needs.

In conclusion, the Publication Plan performs well but significant effects are not predicted.”

3.6.3 This conclusion broadly **holds true** for ‘the submission plan as modified’.

3.7 Economy

Appraisal of proposed modifications

3.7.1 **MM2** proposes deletion of the 1,000 home allocation at Harwell Campus, which represents a significant opportunity missed, from an ‘economy’ perspective. The SA Report stated the following regarding the performance of the spatial strategy, as a whole, in ‘economy’ terms:

“Of particular note is the proposal to deliver around 1,000 dwellings at Harwell Campus... with both housing and future employment development brought forward in line with a comprehensive development framework. The development of a new neighbourhood at the Campus offers the opportunity to create a purpose-built environment, tailored towards the housing needs of the Campus. This should help Harwell Campus to achieve its full potential, evolving from a Science and Innovation Park, to a world class campus environment, or ‘Innovation Village’. There would be accommodation for both permanent and transient employees, fostering interconnectivity between the different individuals and organisations, and in turn engendering cooperation and cross-pollination of ideas. A survey of existing Campus organisations, undertaken by CBRE for the Harwell Campus Partnership, has shown that in addition to business sector clustering, there is predisposition towards social / community clustering among the Campus workforce. The CBRE survey equally revealed that the existing Campus organisations view accommodation costs locally and the lack of flexible (short-term) accommodation as a negative factor that is affecting their ability to attract qualified staff. Housing will be at the expense of land that could otherwise be developed for employment – and indeed land designated at an Enterprise Zone - however, it is anticipated that the Campus should still be able to accommodate at least 5,400 net additional jobs in the plan period up to 2031, as well as potentially further jobs beyond 2031, as ongoing decommissioning of the ‘licensed site’ takes place. Certain consultees questioned the loss of Enterprise Zone to housing development, including on the basis that there is a need for sites suited to ‘Big Science Occupiers’, and on the basis of OXLEP’s update to the Strategy Economic Plan (2017)... However, the development of an ‘Innovation Village’ is strongly supported by Oxfordshire Local Enterprise Partnership (LEP), is considered, by both OXLEP and the Campus to be essential to unlock the sites economic potential, and the site itself is sufficiently large to support projected employment growth up to 2031 and beyond, including for Big Science... Another important factor to consider is that Harwell Campus performs best, out of the Science Vale growth options, in respect of the objective to minimise further traffic congestion.”

3.7.2 However, on the other hand, some of the land that would have been used to deliver 1,000 dwellings will now be available to deliver employment land.

3.7.3 **MM2** also proposes deletion of references to growth opportunity at Dalton Barracks beyond the plan period, however, it is difficult to suggest any significant implications for the achievement of ‘economy’ related sustainability objectives. The proposal remains to develop the site in accordance with ‘garden village principles’, and so it is fair to assume that the possibility of delivering some new small scale employment will be explored, albeit there might now be reduced potential.

3.7.4 Also of note is **MM10**, which proposes a new policy, namely Core Policy 15c: Grove Comprehensive Development Framework. The policy requires preparation of an SPD which, it can be assumed, will have within its remit the matter of supporting access to employment growth locations within Science Vale. Of particular note is the proposed policy requirement to “[understand] how future growth should maximise opportunities for enhanced public transport connections, including a future railway station at Grove.”

Appraisal of the submission plan plus proposed modifications

3.7.5 The SA Report concluded the following in respect of the submission plan -

“The LPP2 spatial strategy performs well, given a focus of housing growth in the Science Vale, and at Harwell Campus in particular (albeit at the expense of some employment land). It may transpire that some small scale employment uses can be delivered at the Dalton Barracks site.

The ‘employment’ focused Development Policies perform well, and should appropriately compliment the Core Policies. In particular, detail is added in support of Core Policies 28-32, which cover: Change of Use; Further and Higher Education; Development to Support the Visitor Economy; and New Development on Unallocated Sites and for Retail Development and other Main Town Centre Uses.

In conclusion, the Publication Plan is predicted to result in significant positive effects.”

3.7.6 This conclusion **no longer holds true** for ‘the submission plan as modified’, given that the plan will not provide for housing growth at Harwell Campus. However, the plan can nonetheless still be seen to perform well.

3.8 Natural environment

Appraisal of proposed modifications

3.8.1 **MM2** proposes deletion of the 1,000 home allocation at Harwell Campus; however, this has limited implications for the achievement of ‘natural environment’ objectives. There would have been the potential to ensure a robust green infrastructure, and explore opportunities for ‘net gain’; however, there are sensitivities associated with the site, including numerous mature trees, some small woodland copses and areas of species rich grassland. Deletion of the housing scheme may mean that there is greater potential to avoid impacts; however, much of the site that would have been used to deliver the housing scheme falls within the Enterprise Zone, and so will likely be developed for employment.

3.8.2 MM2 also proposes deletion of references to growth opportunity at Dalton Barracks beyond the plan period, whilst **MM4** removes reference to provision of an 80 ha country park, instead now proposing a more modest requirement for 30 ha of parkland. It is difficult to conclude on the implications of this for the achievement of ‘natural environment’ objectives. On one hand, this is a very sensitive location for growth, and hence there is a strong argument in favour of supporting a significantly smaller scale scheme (to be focused on the eastern part of the site, which is that part of the site furthest from the areas of greatest sensitivity). However, on the other hand, there might feasibly now be a risk of the scheme expanding in a more piecemeal fashion in the long-term, i.e. without the degree of strategic green infrastructure planning that could be achieved through preparation of a site-wide masterplan at the outset. It is noted that Berks Bucks and Oxfordshire Wildlife stated their support for strategic scale planning of green infrastructure during the examination hearings.

3.8.3 Also of note are the positive implications of MM20, which proposes additional policy wording as part of the Development Policy 30 (Watercourses). Specifically, it proposes the additional requirement that: *“Where a watercourse flows through a development, a buffer zone should be provided on both sides of that watercourse.”*

3.8.4 Also of note is **MM10**, which proposes a new policy, namely Core Policy 15c: Grove Comprehensive Development Framework. The policy requires preparation of an SPD which, according to the proposed supporting text to the policy, will explore the objective to *“achieve a net gain in biodiversity and contribute towards the current deficit in green infrastructure.”*

Appraisal of the submission plan plus proposed modifications

3.8.5 The SA Report concluded the following in respect of the submission plan -

“The spatial strategy performs well in that there is a focus of growth in the South East Vale, where there are fewer biodiversity constraints; however, there are a number of site specific issues that will require further consideration. Most importantly, the HRA has been able to conclude that LPP2 will not lead to likely significant effects on Cothill Fen SAC or Oxford Meadows SAC, either alone or in combination with other plans and projects.

There are no dedicated biodiversity focused Development Policies proposed, recognising that LPP1 sets out to protect and enhance biodiversity through Core Policies 45 and 46; however, proposed policies on ‘Watercourses’ and ‘The Wilts and Berks Canal’ are supportive of biodiversity and green infrastructure objectives.

In conclusion, the Publication Plan performs well, although effects are mixed. There will be a need for mitigation measures, and further detailed work at the planning application stage, most notably at Dalton Barracks. Significant negative effects are not predicted.”

3.8.6 This conclusion broadly **holds true** for ‘the submission plan as modified’.

3.9 Heritage

Appraisal of proposed modifications

3.9.1 **MM2** proposes deletion of the 1,000 home allocation at Harwell Campus; however, this has limited implications for the achievement of ‘heritage’ objectives. Harwell Campus is relatively unconstrained, from a heritage perspective; however, it is not possible to conclude that deletion of the allocation will increase the pressure to develop at other locations that are more sensitive.

3.9.2 **MM2** also proposes deletion of references to growth opportunity at Dalton Barracks beyond the plan period, and consequentially less land is removed from the Green Belt. This might be considered a positive step from a heritage perspective, in particular as the historic centre of Shippon - which has a clear historic character, despite no conservation area designation - lies directly to the south of Dalton Barracks. However, protecting the historic character of Shippon is probably more so a factor of masterplanning, than quantum of growth.

3.9.3 Also of note are the positive implications of **MM21**, which deals with Development Policy 36 (Heritage Assets). Of greatest note is the proposal to supporting “sustainable, non-damaging use” of heritage assets at risk, as opposed to seeking to “protect” such assets.

3.9.4 Finally of note is **MM23**, which deals with Development Policy 39 (Archaeology and Scheduled Monuments). Additional policy wording proposed to ensure that it can be “clearly and convincingly” demonstrated that the “substantial” harm or loss of archaeological remains is necessary to achieve substantial public benefits that outweigh that harm.

Appraisal of the submission plan plus proposed modifications

3.9.5 The SA Report concluded the following in respect of the submission plan -

“The spatial strategy performs well, in that growth is focused primarily at locations that are relatively unconstrained; however, a large scheme to the east of Kingston Bagpuize with Southmoor gives rise to some concerns, given proximity to the conservation area.

The heritage focused Development Policies perform well, and should appropriately compliment the Core Policies. In particular, detail is added in support of Core Policy 39 (The Historic Environment).

In conclusion, the Publication Plan performs well, although effects are mixed. There will be good potential for mitigation through masterplanning, design and landscaping measures, and on this basis significant negative effects are not likely. Historic England responded to the Preferred Options consultation (at which time all of the current proposed allocations were also proposed) stating no objection to the plan, given the suite of general and site specific policy requirements proposed.”

3.9.6 This conclusion broadly **holds true** for ‘the submission plan as modified’.

3.10 Landscape

Appraisal of proposed modifications

3.10.1 **MM2** proposes deletion of the 1,000 home allocation at Harwell Campus, which might be considered a positive step from a ‘landscape’ perspective, given the location of Harwell Campus within the North Wessex Downs AONB. However, this is not entirely clear cut, as the majority of the site is an existing employment allocation, and indeed falls within a designated Enterprise Zone, such that the likelihood is that this part of the site will be developed for employment uses, which could well involve development of a height and ‘massing’ at least equivalent to that which would have been seen through the housing scheme. It is also important to note that detailed work had been undertaken to explore landscape capacity and sensitivity issues, which informed the decision to allocate the site, and was also feeding into work on a masterplan SPD.

3.10.2 **MM2** also proposes deletion of references to growth opportunity at Dalton Barracks beyond the plan period, and consequentially less land is removed from the Green Belt. This might be considered a positive step from a Green Belt and/or landscape perspective; however, there is limited evidence upon which to base a strong conclusion, with the Inspector’s letter to the Council on Dalton Barracks (October 2018) not reaching a conclusion on the Green Belt or landscape value of the land in question. Green Belt and landscape impacts associated with the submission proposal for Dalton Barracks were discussed at paragraph 10.10.1 of the SA Report.

3.10.3 Furthermore, **MM6** removes references to “Provision for a public transport and cycle link between Dalton Barracks and the Lodge Hill Park and Ride site”, which can be considered a positive step from a ‘landscape’ perspective. Whilst there is no certainty regarding what form the link might have taken, it is inevitable that there would have been landscape impacts.

3.10.4 Also of note is **MM19**, which proposes a change to Development Policy 29 (Settlement Character and Gaps), with the proposal now to refer to the need to avoid “*unacceptably*” diminishing the physical and visual separation between two separate settlements. The effect is unlikely to be any significantly increased loss of physical / visual separation.

Appraisal of the submission plan plus proposed modifications

3.10.5 The SA Report concluded the following in respect of the submission plan -

“The spatial strategy performs well in that careful account of landscape capacity has informed the site selection process, and as such the majority of proposed allocations are relatively unconstrained in this respect. Nonetheless, there are some site-specific issues, including at Dalton Barracks and Harwell Campus. The latter lies within the North Wessex Downs AONB (albeit the site is an existing employment allocation, and the potential to avoid impacts through careful masterplanning and design has been established).

The Development Policies perform well, and should appropriately compliment the Core Policies. In particular, detail is added in support of Core Policy 37 (Design and Local Distinctiveness) and Core Policy 44 (Landscape).

In conclusion, the Proposed Publication Plan performs well, and it is noted that SPDs will be prepared for the two key sites.”

- 3.10.6 On balance, it is fair to conclude that ‘the submission plan as modified’ performs **more positively**, in particular because of the proposed modification relating to Harwell Campus; however, it is still not possible to conclude ‘significant’ positive effects.

3.11 Pollution

Appraisal of proposed modifications

- 3.11.1 **MM2** proposes deletion of the 1,000 home allocation at Harwell Campus; however, this has limited implications for the achievement of ‘pollution’ objectives. The SA Report did not highlight any particular concerns associated with the allocation.

- 3.11.2 **MM2** also proposes deletion of references to growth opportunity at Dalton Barracks beyond the plan period, which could potentially be considered a positive step from a ‘pollution’ perspective; however, on the other hand, **MM6** removes references to “Provision for a public transport and cycle link between Dalton Barracks and the Lodge Hill Park and Ride site”, which is perhaps less than ideal. The SA Report stated: *“The proposed 1,200 home Dalton Barracks scheme will also result in some trips through Marcham, although the proportion is likely to be low, and it is noted that the proposal is to link Dalton Barracks to the Lodge Hill P&R, and thereby improve public transport connectivity considerably.”*

Appraisal of the submission plan plus proposed modifications

- 3.11.3 The SA Report concluded the following in respect of the submission plan -

“The proposed package of site allocations at this Publication stage is an improvement on that proposed at the Preferred Options stage; however, the proposal to focus growth in the Abingdon-on-Thames to Oxford Fringe Sub Area at locations where there is the potential for increased car movements through the Marcham AQMA still gives rise to some concerns. Also, it is noted that the strategy performs relatively well in respect of minimising traffic within the Botley and Abingdon-on-Thames AQMAs.

The pollution, environmental quality and amenity focused Development Policies perform well, and should appropriately compliment the Core Policies. In particular, detail is added in support of Core Policies 37 (Design and Local Distinctiveness) and 43 (Natural Resources).

In conclusion, it is appropriate ‘flag’ uncertain significant negative effects, given the Marcham AQMA issue. There will be a need for further detailed work, particularly in relation to the proposed South East Marcham site.”

- 3.11.4 This conclusion broadly **holds true** for ‘the submission plan as modified’, albeit the proposal to delete support for a link between Dalton Barracks and Lodge Hill Park and Ride is a minor ‘negative’ associated with the proposed modifications.

3.12 Climate change mitigation

Appraisal of proposed modifications

- 3.12.1 **MM2** proposes deletion of the 1,000 home allocation at Harwell Campus, which potentially represents something of an opportunity missed, from a ‘climate change’ perspective. A scheme of this scale might have been able to deliver some low carbon infrastructure and/or exemplar sustainable design/construction measures, also noting the commitment to higher density development, the proximity of employment land (which can help with spreading demand across the day) and more generally the forward thinking ethos of the campus environment; however, there is no certainty that this would have been the case. Also, as has already been discussed under the ‘movement’ heading, deletion of the Harwell Campus allocation represents an opportunity missed in respect of supporting modal shift away from the private car / towards public transport and walking/cycling.

- 3.12.2 MM2 also proposes deletion of references to growth opportunity at Dalton Barracks beyond the plan period, which does represent an opportunity missed, from a 'climate change' perspective, given an assumption that the effect will be to decrease the viability of delivering low carbon measures. The SA Report stated the following:

“Proposals for decentralised heat and power generation have not yet been advanced for any of the schemes under consideration; however, there could well be opportunities at Dalton Barracks, given the scale of the site. There is also the possibility of exploring the option of a mixed use development, which could be supportive of decentralised heat and power, as demand would be spread more evenly across the day. It is noted that Core Policy 8b (Dalton Barracks Comprehensive Development Framework) establishes that the new housing will meet exemplar design standards and follow ‘Garden Village’ principles, which is deemed appropriate given the scale and location of the site. The Town and Country Planning Association (TCPA) have developed nine Garden Village principles including: “development that... uses zero-carbon and energy-positive technology to ensure climate resilience.””

- 3.12.3 Also of note are the positive implications of **MM20**, which proposes additional policy wording as part of the Development Policy 30 (Watercourses). Specifically, it proposes the additional requirement that: *“Where a watercourse flows through a development, a buffer zone should be provided on both sides of that watercourse.”*

Appraisal of the submission plan plus proposed modifications

- 3.12.4 The SA Report concluded the following in respect of the submission plan -

“Focusing on the matter of minimising per capita CO2 emissions from the built environment (as opposed to emissions from transport), the proposed spatial strategy performs well in that there is a concentration of growth at larger sites, potentially leading to opportunities to design-in low carbon infrastructure. However, there is little certainty, at this early stage. In practice it is recognised that many, if not most, large schemes will divert funds towards other matters including affordable housing and transport infrastructure upgrades, ahead of low carbon infrastructure.

No proposed LPP2 Development Policies are focused on climate change mitigation / low carbon development, recognising that a strong policy framework is provided by Core Policy 40 (Sustainable Design and Construction) and Core Policy 41 (Renewable Energy). See also the discussion above, regarding the performance of policies in terms of 'Movement' objectives.

In conclusion, effects are uncertain. Further work should examine the capacity of sites to deliver low carbon infrastructure. Significant effects are not predicted, recognising that climate change is a global issue (and hence local actions can have only limited effect).”

- 3.12.5 This conclusion broadly **holds true** for 'the submission plan as modified', albeit it is noted that the effect of proposed modifications is to reduce the “concentration of growth at larger sites”.

3.13 Climate change adaptation

Appraisal of proposed modifications

- 3.13.1 **MM2** proposes deletion of the 1,000 home allocation at Harwell Campus, and also deletion of references to growth opportunity at Dalton Barracks beyond the plan period; however, this does not lead to any implications for 'climate change adaptation'. Neither location is subject to problematic flood risk, and the Water Cycle Study (2017) concludes sufficient capacity at waste water treatment works. Another consideration is loss of best and most versatile (BMV) agricultural land, with the SA Report stating:

“The nationally available ‘provisional’ dataset (which is very low resolution, so much so that larger villages are not recognised as non-agricultural; and which does not differentiate between grades 3a and 3b) shows there to be a band of BMV land... stretching between Dalton Barracks to Kingston Bagpuize with Southmoor (and beyond). On the basis of this dataset, it seems likely that... part of North of Harwell Campus that is not brownfield; however, there is no certainty in the absence of detailed survey work. The only proposed allocation that has been surveyed in detail (i.e. using the ‘post 1988 criteria, which necessitates soil samples) is North West of Grove, which is found to comprise a mixture of grades 3b and grade 4).”

Appraisal of the submission plan plus proposed modifications

3.13.2 The SA Report concluded the following in respect of the submission plan -

“The spatial strategy performs well in that areas at risk of flooding are set to be avoided. Other climate change adaptation issues relate to water resources and water quality, and in this respect an issue has been highlighted in respect of Wastewater Treatment Works capacity. It is also noted that some loss of ‘best and most versatile’ agricultural land is likely, but equally the proposal is to make good use of previously developed (‘brownfield’) land.

No proposed LPP2 Development Policies are focused on flood risk, water or other climate change adaptation related issues. However, the policies discussed above as performing well in ‘Biodiversity’ terms are relevant.

In conclusion, it is appropriate ‘flag’ uncertain significant negative effects, given the issue of WwWT capacity; however, policy is in place to ensure delivery of capacity upgrades as necessary, ahead of housing growth.”

3.13.3 This conclusion broadly **holds true** for ‘the submission plan as modified’.

4 CONCLUSIONS AT THIS CURRENT STAGE

Appraisal of proposed modifications

4.1.1 The appraisal has focused primarily on the proposed changes to the spatial strategy, namely the proposal to delete the 1,000 home Harwell Campus allocation and also delete references to growth opportunity at Dalton Barracks beyond the plan period (consequently removing less land from the Green Belt; also of note is the deletion of reference to providing a link between Dalton Barracks and the Lodge Hill Park and Ride site). Both proposals are found to perform well in respect of ‘landscape’ objectives, but do give rise to tensions in certain respects, most notably in terms of ‘health’ (as the Dalton Barracks proposed modification removes, or at least defers, the opportunity to deliver a new country park) and ‘the economy’ (as the deletion of the Harwell Campus allocation is, on balance, considered to conflict with objectives for expanding the role of the Campus within Science Vale, and the national economy). Other proposed modifications generally perform well, in particular the proposed new Core Policy 15c: Grove Comprehensive Development Framework, which is supportive of several sustainability objectives.

Appraisal of the submission plan plus proposed modifications

4.1.2 The overall conclusions presented within the 2017 SA Report were as follows:

“The appraisal finds the Publication Plan to perform well in terms of the majority of objectives, with ‘significant positive effects’ predicted in terms of: ‘Housing’ (as objectively assessed housing needs should be met), ‘Services and Facilities’ (given an expectation that the proposed Dalton Barracks scheme will lead to delivery of a new secondary school) and ‘the Economy’ (given the proposed high growth strategy within Science Vale). No ‘significant negative effects’ are predicted; however, issues/uncertainties are highlighted in respect of: ‘Pollution’ (given a risk of worsened air quality within the Marcham AQMA; and ‘Climate change adaptation’ (given some issues in respect of Wastewater Treatment Works capacity). A number of effects are dependent on the nature of the scheme at Dalton Barracks, given the site’s potential capacity.”

- 4.1.3 The plan plus proposed modifications performs less positively in respect of ‘the economy’; however, the plan does now perform better in ‘landscape’ terms. Conclusions reached within the SA Report in respect of the other nine sustainability topic headings broadly hold true for the plan plus proposed modifications.

5 MONITORING

- 5.1.1 The SA Report makes the following statement, in respect of ‘measures envisaged concerning monitoring:

“A proposed monitoring framework is presented within Appendices of LPP2, and links to Policy CP47a (Delivery and contingency). The plan monitoring framework should provide a good basis for monitoring the effects of LPP2.

The ‘uncertain’ effects [highlighted through appraisal] serve to suggest that there might be a focus on monitoring indicators relating to air quality and wastewater treatment work capacity. Other issues/impacts that might benefit from increased monitoring effort include affordable housing delivery, recreational use of Cothill Fen SAC and delivery of transport improvement measures.”

- 5.1.2 This statement broadly **holds true** for ‘the submission plan as modified’.

6 NEXT STEPS

- 6.1.1 The next step is for the Inspector to consider the representations raised as part of the consultation, alongside this SA Report Addendum, before deciding whether he is in a position to write his report on the Plan’s soundness.
- 6.1.2 Assuming that the Inspector is able to find the Plan (as modified) to be ‘sound’, it will then be formally adopted by the Council. At the time of adoption an ‘SA Statement’ will be published that explains the process of plan-making / SA in full and presents ‘measures decided concerning monitoring’.