
Review of the Sustainability Appraisal undertaken to inform the South Oxfordshire Local Plan 2011-2031

**Prepared on behalf of L&Q Estates
In relation to land at North Wallingford**

February 2019

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Prepared by:	Andrew Malcomson / Emily Ford	Andrew Malcomson / Emily Ford
Checked by:	Lucy Wood	Lucy Wood

Barton Willmore LLP
7 Soho Square
London
W1D 3QB

Tel: 020 7446 6888

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1 INTRODUCTION

- 1.1 This report has been prepared on behalf of L&Q Estates in relation to land at North Wallingford. The report sets out the findings of a review of the Sustainability Appraisal (SA) of the South Oxfordshire Local Plan, the reports for which were published alongside the submission version of the Local Plan under Regulation 19. The final SA Report (December 2018) and subsequent Addendum (January 2019) were prepared on behalf of South Oxfordshire District Council (SODC) by Wood. Previous SA documentation was prepared by Amec Foster Wheeler (now Wood) and included:
- South Oxfordshire Local Plan 2031 Interim SA Refined Options, February 2015;
 - SA Report of the South Oxfordshire Local Plan Preferred Options Stage Three of the Process, June 2016;
 - SA Report of the South Oxfordshire Local Plan Preferred Options 2 Stage Four of the Process, March 2017; and
 - SA Report of the Publication version South Oxfordshire Local Plan, October 2017.
- 1.2 Section 2 sets out the findings of a review against the requirements of The Environmental Assessment of Plans and Programmes Regulations 2004 (referred to as the “SEA Regulations”), section 19 of the Planning & Compulsory Purchase Act 2004 and Planning Practice Guidance. It is not a formal legal review but considers whether or not the SA complies with the regulatory requirements.
- 1.3 In addition, Section 3 sets out a site-specific review of how land at North Wallingford has been considered within the SA process along with whether the allocation of this site has been based on sound rationale.
- 1.4 The review has focused on the December 2018 SA Report and January 2019 Addendum, but due regard has been given to previous SA reporting.
- 1.5 For the purposes of this report, where reference is made to the December 2018 Report, this includes reference to the minor corrections and amendments made within the January 2019 Addendum.

2 REVIEW OF THE SA

- 2.1 The full regulatory review is provided at **Appendix 1** and summarised in this chapter. The review has found no major deficiencies in the SA process. The assessment of the South Oxfordshire Local Plan and description and appraisal of reasonable alternatives has been undertaken thoroughly and documented comprehensively, for the most part. There are, however, some minor areas that warrant additional explanation or detail to justify the approach taken, in particular to assessing reasonable alternatives, cumulative effects and provisions made for monitoring. This is discussed in detail in the following sections according to the main components of SA. The following sections set out a review against the main themes of SA.

SA Approach & Structure

- 2.2 The SA process has been undertaken over several years and commenced with consultation on the Scoping Report in the summer of 2014. The responses received as part of this process are set out in Appendix B of the December 2018 Report, along with how each has been addressed through the iterative assessment process, demonstrating the required consultation has been undertaken and duly considered.
- 2.3 The process has culminated in the December 2018 Report, which integrates, updates and amalgamates previous SA reporting. Retention of the same consultant team (Amec Foster Wheeler changed name to Wood between 2017 and 2018 reporting) by SODC and a resulting consistent approach sets out a clear and easy to follow SA process. Whilst the report is thorough and meets the requirements of the SA Regulations, minor points are discussed below in relation to alternatives, appraisal of the plan, mitigation, monitoring and cumulative effects.

Alternatives

- 2.4 The SA Report contains detailed narrative on the consideration of reasonable alternatives including different spatial strategies for the distribution of development. Section 5 sets out the broad environmental, economic and social effects associated with each option. Discussion and narrative on alternatives is detailed and thorough. As is normal with SA, this section includes broad statements, and there are elements which would benefit from further explanation.
- 2.5 For instance, at 5.3.71 the report states that ‘...no one alternative option performed with overall significant positive effects...’ and thus a cherry-picking exercise has been undertaken

to choose the best of each and form a 'Refined Option'. When considering Option A 'Core Strategy', Option B 'Science Vale and Sustainable Settlements' and Option C 'All in Science Vale', all score comparatively well (see Table 5.2 for this in graphic form). Whilst it is clear that the 'Refined Option' scores particularly well in comparison, the report clearly states that there would also be a mixture of significant positive, significant negative and uncertain effects. Whilst on balance the 'Refined Option' may be less negative overall and rationale for site selection is provided, it is still not wholly clear why the Refined Option was not originally considered and the motives behind the cherry picking exercise. Following a review of the approach to North Wallingford through the SA process, for instance, there are concerns relating to the evidence base on which some strategic sites were included/excluded.

- 2.6 The "do nothing" alternative has not been explicitly tested as a separate alternative within the SA, albeit it is stated that in the absence of the Local Plan development will still occur, but in less sustainable locations, which complies with the regulatory requirements. Further testing would be helpful but would not change the outcome of the SA.

Appraisal of the Plan

- 2.7 The SA Report presents a fair and reasoned appraisal of the likely sustainability effects of the Local Plan, considering thematic policies as well as proposed locations for development. The sustainability objectives cover all the environmental issues listed in the SA Regulations and are appropriate for the environmental, social and economic context set out in SA reporting, as do the assessment criteria that have been applied.
- 2.8 One way in which the report could be improved relates to how it considers the interrelationship between different effects/environmental factors. Some interactions are referred to throughout reporting, such as increased traffic leading to potential increases in implications for Air Quality, particularly in reference to the Oxford City Air Quality Management Area. The report also acknowledges that interactive effects were considered within the HRA process undertaken for the Local Plan. More detailed analysis, other than the recognition that interactive effects would occur, is not provided within the report itself. It would be helpful to clarify effects further, albeit this is not considered material to the soundness of the SA process.

Mitigation

- 2.9 Section 8.7 sets out the recommendations made during the SA process in relation to improving the suitability credentials/agenda of the Local Plan. It is clear and easy to follow where policy

has been amended to take account of these recommendations, aimed at improving sustainable development through accordance with such criteria as BREEAM and the Home Quality Mark.

- 2.10 Site specific analysis has included consideration of mitigation within the assessment against the SA Objectives. An inconsistent approach to treatment of mitigation is often an area of weakness in SA. In this case, mitigation in relation to renewable energy and safety has been assumed as inherent to every site, flood risk mitigation has not. Section 3 of this report considers site specific analysis of North Wallingford and the application of assessment criteria.

Monitoring

- 2.11 Appendix R (albeit the main body of the report erroneously refers to this as Appendix S) presents a review of the proposed monitoring indicators against the topics in the SEA Regulations.
- 2.12 The report states that it will be important that any monitoring regime associated with the SA is embedded within monitoring associated with the Local Plan and other Council workstreams, so as to avoid duplication of effort. The report leaves the commitment, detail and mechanism for monitoring (including any remedial measures) for later stages within the Authority's Monitoring Report. The Local Plan is likewise, whilst clear on the targets to be met, not clear on how/when monitoring will occur and of any route for remedial action that may need to be undertaken. It is recommended that clarification is made within either the SA documentation or the Local Plan itself.

Cumulative Effects

- 2.13 Cumulative effects are discussed throughout the report, but most explicitly within Section 8.4 'Potential Cumulative Effects'. This is high level and summarises the cumulative effects of each policy chapter of the Local Plan on the SA objectives and provides an overall judgement on the cumulative effect of the plan policies (including proposed site allocations) as a whole. It is, for instance, difficult/impossible to determine the cumulative effects of policies and allocations on receptors in any definitive form.
- 2.14 The assessment is high level, as is normal with SA, but would benefit from additional analysis and reporting to make it clear that cumulative effects could result from the Local Plan, other Plans and Programmes and from strategic allocations on common receptors.

3 SITE SPECIFIC REVIEW

3.1 The following section sets out a review of the SA process in relation to land at North Wallingford. This considers the rationale for the selection of options for strategic sites, including the basis on which site selection has occurred, and an appraisal of North Wallingford in accordance with the methodology adopted within the SA process (provided at **Appendix 2**).

Consideration of Options for Strategic Sites

3.2 Paragraph 7.5.1 of the December 2018 Report outlines the approach to the selection of options for strategic sites. The report states that SODC focussed its search on 'larger, more strategic development sites' in response to the number of homes to be delivered through neighbourhood plans across the district. It is unclear from the SA Report whether this approach has been considered alongside other reasonable alternative approaches to site selection, for example the appraisal of all promoted sites and later consideration of the relationship to neighbourhood plans through the plan-making process, as opposed to excluding sites prior to their assessment.

3.3 Options for strategic sites are appraised within Section 7.5 of the SA Report. Paragraph 7.5.4 states that potential sites were derived from three categories:

- **The proposed strategic allocations in the Publication Version South Oxfordshire Local Plan 2033 (October 2017);**
- **Sites that had previously been considered as potential strategic allocations at earlier stages in the local plan process, but which were not progressed at that time; and**
- **Other sites submitted through the Local Plan 2033 process up to the end of the Regulation 19 consultation (30 November 2017), subject to them complying with the basic Area Assessment Principles set out in the Council's site selection work.**

3.4 The Draft Local Plan relies on the Site Selection Background Paper, which has not been subject to SA. Whilst the SA Report is broadly sound, flaws in SODC's assessment of site options within the Background Paper results in a flawed basis on which the assessment of site options has been undertaken within the SA.

3.5 The Background Paper does not include reasoned justification for the use of a 500 homes threshold for the inclusion of sites within the site assessment process as part of the Area

Assessment Principles, with no evidence available to demonstrate that this approach is appropriate in sustainability terms.

- 3.6 The same can be said for the exclusion of sites within neighbourhood plan areas. SODC outline in Table 5 of the Background Paper that 'officers will have to take a view on the status of the plan and the rate of its progression to determine whether the Council should at least consider the site as being capable of meeting the area assessment principle'. This entails a subjective judgement and, in order to be robust, should instead be based on key milestones within the preparation of a neighbourhood plan, with consultation on a draft plan and/or submission of the plan seen as evidence that a plan is progressing. Moreover, there is no certainty that site options will be assessed through emerging Neighbourhood Plans as there is no requirement for neighbourhood plans to allocate sites.
- 3.7 As such, we question SODC's approach to the assessment of options for accommodating the South Oxfordshire's housing need which has excluded some options without documenting the rationale behind this. On this basis, the Local Plan does not appear to be based on a transparent and robust site selection process.

Consideration of Land at North Wallingford

- 3.8 A total of 15 strategic sites are identified within the SA Report. However, there are additional sites which complies with one or more of these categories, have been promoted through the emerging South Oxfordshire Local Plan process and have not been considered.
- 3.9 Land at North Wallingford is one such site and comprises land which is controlled and promoted by L&Q Estates (forming the western parcel) and Croudace Strategic (which forms the eastern parcel). In combination, the site presents an opportunity for the development of circa. 1,000 homes in addition to public open space and community infrastructure.
- 3.10 Land at North Wallingford was promoted and considered as part of the South Oxfordshire Core Strategy process (referred to as Site A). The Core Strategy evidence base demonstrates that Site A is one of the most sustainable options for growth at Wallingford, with the SA (December 2010) identifying Site A and Site B, which has subsequently become subject to a resolution to grant planning permission, as the two most sustainable site options at Wallingford.
- 3.11 Subsequently, Land at North Wallingford has been promoted through each consultation on the emerging Local Plan. This includes promotion by Barton Willmore LLP on behalf of Gallagher Estates (now L&Q Estates) at every stage of consultation since March 2015. More

recent site promotion for L&Q Estates, and the adjoining developer Croudace Strategic, has identified the potential for separate smaller-scale development to be brought forward in this location. However, this does not preclude the opportunity for a comprehensive strategic development.

3.12 Land at North Wallingford complies with the Area Assessment Principles identified in Table 5 of SODC's Strategic Site Selection Background Paper, as discussed below:

- As noted above, land controlled by L&Q Estates and Croudace Strategic presents an opportunity for the development of approximately 1,000 new homes, well in excess of the 500 homes threshold identified by SODC. Notwithstanding this, sites with a capacity smaller than 500 homes are not rejected on the basis of not according with this principle. This includes Reading Golf Club and Palmers Riding Stables which are identified by SODC as having a capacity of 479 dwellings and 300 dwellings, respectively.
- Table 5 of the Background Paper specifies that, for proposals for new settlements, a location within the 'area of search' or Science Vale is necessary; Land at North Wallingford does not propose a new settlement. This Area Assessment Principle is therefore not relevant.
- Land at North Wallingford is not located within a made neighbourhood plan area. Whilst the site is located within the Wallingford Neighbourhood Plan designated area, there has been limited progress with preparing the Wallingford Neighbourhood Plan. Indeed, SODC note that the plan 'has been slow to progress'¹. In addition, it is anticipated that the Wallingford Neighbourhood Plan will not identify any site allocations following a resolution to grant planning permission on one strategic site within the Neighbourhood Plan designated area. On this basis, in the context of a District constrained by Green Belt and numerous other constraints, the intention to progress a neighbourhood plan at some point in the future is not sufficient justification for excluding a sustainable and deliverable site from consideration.
- Land at North Wallingford is controlled and has been actively promoted by our client, L&Q Estates, and the adjoining developer, Croudace Strategic. There are no constraints to bringing the site forward for development now. The site is deliverable and could be brought forward within the first five years of the Local Plan's adoption.

3.13 Land at North Wallingford should therefore have been identified as a potential strategic site option in SODC's Background Paper and in the SA Report.

¹ SODC Site Selection Paper Appendix 7

- 3.14 Land at North Wallingford is not appraised as a strategic site option in the SA Report. No justification for exclusion of the site is provided within the SA Report. Equally, no justification for the exclusion of the site has been provided by SODC following a request for clarification of the site's position made on behalf of L&Q Estates in August 2018² (**Appendix 3**). In the absence of any justification for the lack of consideration, we consider that the site should have been appraised alongside other strategic site options for the Local Plan.
- 3.15 An appraisal of Land at North Wallingford has been prepared as part of this review and is provided at **Appendix 2**. The review appraises the land controlled by L&Q Estates against the 17 SA Objectives identified in the SA Report, utilising the approach applied in the appraisal of the 15 site options considered within the SA Report. Whilst the appraisal relates specifically to land controlled by L&Q Estates, it is anticipated that appraisal of the land in combination with adjacent land controlled by Croudace Strategic would result in a comparable outcome.
- 3.16 The appraisal demonstrates that Land at North Wallingford is comparable to, and in some respects better than, other strategic site options. In particular, the site offers the potential for significant positive effects in relation to SA Objectives 1 and 15 through the provision of new housing and a primary school. Positive effects on numerous other SA Objectives are also anticipated, given the site's proximity to Wallingford and the potential for infrastructure enhancements, including the provision of public open space, as part of the proposed development. Overall, the appraisal demonstrates that Land at North Wallingford scores comparatively with sites including Thornhill, Hagbourne Fields and North Weston. In addition, in contrast to Hagbourne Fields and North Weston, Land at North Wallingford is not anticipated to result in a negative effect on the historic environment (SA Objective 9).

Consideration of Alternative Scenarios

- 3.17 As set out above, North Wallingford should have been considered as a strategic site option in the SA Report.
- 3.18 Furthermore, on the basis of the appraisal of the site provided at **Appendix 2**, the site is a sustainable option for growth. In the context of the identification of Wallingford as a 'sustainable settlement'³, the site should therefore have progressed to the 'consideration of alternative scenarios' stage of the SA process and be considered as part of the scenarios involving combinations of the most sustainable sites identified in paragraph 7.5.60 of the SA Report.

² Letter to SODC, dated 17th August 2018, provided at Appendix 3

³ SA Report (December 2018) Table 5.3

4 CONCLUSION

- 4.1 This report has appraised the site against the regulatory requirements of The Environmental Assessment of Plans and Programmes Regulations 2004 (referred to as the “SEA Regulations”) and section 19 of the Planning & Compulsory Purchase Act 2004 and Planning Practice Guidance. It is not a formal legal review but considers whether or not the SA complies with the regulatory requirements.
- 4.2 In addition, the report has appraised the approach to the consideration of strategic sites options including in relation to how site options were identified and assessed.
- 4.3 In summary, concerns have been identified in relation to the approach to the consideration of ‘alternatives’ within the SA process, particularly as a result of the lack of assessment of some promoted spatial options to provide for South Oxfordshire’s housing need. This includes North Wallingford within SODC’s site selection work, which informs the SA, and the SA process itself.
- 4.4 SODC’s Site Selection Background Paper which itself does not include a transparent and robust assessment of site options and does not document the justification for the exclusion of some potential site options, such as North Wallingford. As a result, the SA Report is not based on a robust assessment of all site options.
- 4.5 Site specific appraisal of North Wallingford demonstrates that the site is comparable to, and in some respects better than, other strategic site options. The exclusion of the site from the emerging Local Plan is, therefore, not considered to be justified or robust, particularly because the site has not been appraised alongside other ‘alternatives’.

APPENDIX 1

SA REGULATORY REVIEW

Review of the Sustainability Appraisal of the emerging SODC Local Plan - Regulatory Compliance			
	Compliance	Notes/Recommendations	
<p><i>This is not a legal review. The SA report dated October 2018 has been reviewed against the SEA Regulations and requirements of the Planning & Compulsory Purchase Act 2004 on SA. The SA (December 2018) SA Addendum (January 2019) and SA Review undertaken for previous iterations of the plan have been referred to where relevant.</i></p>	<p>Key</p>		
			Meets requirements
			Improvements suggested
			Risk of challenge. Does not meet requirements
SEA Regulations, Regulation 12 and Schedule 2 - Contents of Environmental Report			
1. An outline of the contents and main objectives of the plan or programme, and of its relationship with other relevant plans and programmes.		The December 2018 Report states out the SA Objects within 'Table NTS1: SA Objectives'. Section 2 of the report sets out a review of those plans and programmes relevant to the Local plan and the SA, with detailed analysis at Appendix C. The duty to cooperate and reference to providing for Oxford City housing need is referred to throughout, with the January 2019 Addendum Report dealing with an increase in the numbers to be provided.	
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.		The December 2018 Report sets out 'Baseline Analyses' in Chapter 3. This replicates and updates analysis contained within previous iterations of the SA with reference to recently published Local Plan evidence base and a more general review undertaken by Wood. In term of a future baseline without implementation of the Local Plan, Chapter 3 also reports how each topic (set out at 3.1.3) would evolve in a 'do nothing' scenario with reference to published statistics and reporting where possible. The approach here is acceptable and goes further than many SAs we have seen, which have been accepted by inspectors.	
3. The environmental characteristics of areas likely to be significantly affected		Chapter 3, as described above, also contains reference to the characteristics and vulnerabilities associated with environmental designations and receptors.	
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds(a) and the Habitats Directive.		Chapter 3 inherently includes discussion of those areas of particular environmental importance, including those designated pursuant to Council Directive 79/409/EEC on the conservation of wild birds and the Habitats Directive.	
5. The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.		National objectives such as reducing carbon dioxide emissions and not increasing the risk of flooding are mentioned at various places throughout the SA report. The December 2018 Report, at 1.2.3 and elsewhere, acknowledges that the NPPF requires Councils to seek to achieve economic, social and environmental dimensions of sustainable development, implying that the environmental requirements of the NPPF (national policy) have been taken into account. The SA Framework is formed of sensible, relevant objectives that reflect the baseline information and general thought about elements of the environment to be protected. This includes linking to national or international protection objectives within chapter 3 and thorough a thorough analysis of other plans and programmes within Appendix C.	
6. The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues such as— (a) biodiversity; (b) population; (c) human health; (d) fauna; (e) flora; (f) soil; (g) water; (h) air; (i) climatic factors; (j) material assets; (k) cultural heritage, including architectural and archaeological heritage; (l) landscape; and (m) the inter-relationship between the issues referred to in sub-paragraphs (a) to (l).		The sustainability objectives cover all the environmental issues listed, as do the assessment criteria that have been applied. Cumulative effects are discussed throughout the report, but most explicitly within Section 8.4 'Potential Cumulative Effects'. This is high level and summarises the cumulative effects of each policy chapter on the SA objectives and provides an overall judgement on the cumulative effect of the plan policies (including proposed site allocations) as a whole. It is, for instance, difficult/impossible to determine the cumulative effects of policies and allocations on receptors in any definitive form. Whilst the assessment is very clear about where more than one effect could occur/factor could be influenced, the interrelationship between factors is not made absolutely clear in the assessment. Some interactions are referred to throughout such as increased traffic leading to potential increases in implications for Air Quality, particularly in reference to the Oxford City Air Quality Management Area. It is acknowledged that interactive effects were considered within the HRA process undertaken for the plan process. In summary, whilst consideration of synergistic effects has been included, there is room for greater exploration. Whilst there are some concerns relating to the reporting of significant effects, it is not considered that these are material to the soundness of the SA process.	
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.		The QA checklist (Appendix A of the December 2018 Report) directs the reader to Section 8.7 of the report for a report of mitigation measures. Section 8.7 sets out the recommendations of the SA process and where/how these have been complied with by SODC within the plan making process. It is clear where policy has been amended to make reference to requirements targeting a sustainable agenda within the plan.	
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.		Section 5 of the December 2018 Report provides a section on each spatial option. This sets out the broad environmental, economic and social effects associated with each option. Discussion and narrative on alternatives is detailed and thorough but needs additional explanation in places to be completely robust. As is normal with SA, this section includes broad statements, and there are elements which would benefit from further explanation. For instance, at 5.3.71 the report states that no one single option performed with overall significant positive effects and thus a cherry picking exercise has been undertaken to choose the best of each. When considering Options A Core Strategy, Option B Science Vale and Sustainable Settlements and Option C All in science Vale, all score comparatively well (see Table 5 2 for this in graphic form). The 'Refined Option' is then discussed and it clearly states that there would be a mixture of significant positive, significant negative and uncertain effects. These effects would be a similar balancing act and, whilst on balance may be less negative overall, this is not expressly stated and the choices for a refined option does beg the question of how the location of which sites are best/most sustainable has been distilled. The "do nothing" alternative has not been tested, albeit it is stated that in the absence of the Local Plan development will still occur in less sustainable locations.	
9. A description of the measures envisaged concerning monitoring in accordance with regulation 17.		Appendix R (albeit the main body of the report erroneously refers to this as Appendix S) presents a review of the proposed monitoring indicators against the topics in the SEA Directive. The main body of the report and Appendix R is not specific about the mechanism by which monitoring would be secured - leaving this for later stages within the Authority's Monitoring Report. The report states that it will be important that any monitoring regime associated with the SA is embedded within monitoring associated with the Local Plan and other Council workstreams, so as to avoid duplication of effort. The Local Plan is in turn, whilst clear on the targets to be met, not clear on how/when monitoring will occur and of any remedial action that may need to be undertaken. It is recommended that clarification is made within either the SA documentation or the Local Plan itself.	
10. A non-technical summary of the information provided under paragraphs 1 to 9		The non-technical summary is clear, concise and appropriate for a non-technical audience.	
Planning & Compulsory Purchase Act 2004 - Section 19 Requirements for SA			
Stages from Planning Practice Guidance Paragraph: 013 Reference ID: 11-013-20140306.			
PPG paragraph references provided below, where relevant.			
A Setting the context and objectives, establishing the baseline and deciding on the scope			
Identifying relevant policies, plans and programmes		The SA report sets this out. The Scoping Report also contains a thorough plan, policy and programme review in Appendix C	

Collecting baseline information		The December 2018 Report sets out 'Baseline Analyses' in Chapter 3. This replicates and updates analysis contained within previous iterations of the SA with reference to recently published Local Plan evidence base and a more general review undertaken by Wood.
Identifying environmental and sustainability issues		These are clearly identified, starting from a baseline data review and informing the sustainability objectives of the SA framework.
Identifying appraisal objectives		The December 2018 Report sets out the SA Objects within 'Table NTS1: SA Objectives'. Section 2 of the report sets out a review of those plans and programmes relevant to the Local plan and the SA, with detailed analysis at Appendix C.
Consulting on the scope of the appraisal		The Scoping Report is clear and sets out a summary of consultee responses received on the SA thus far (Appendix B), along with responses on each comment received.
B Developing and refining options and assessing effects		
Testing the Plan objectives against appraisal objectives		The Plan policies are tested comprehensively against the SA objectives.
Developing and refining the alternative options for the plan		See point 8. above.
Predicting and evaluating the significant effects of the options and alternatives		See point 6. and 8. above.
Considering ways of mitigating adverse effects and maximising beneficial impacts		See point 7. above.
Proposing measures to monitor significant effects Paragraph: 025 Reference ID: 11-025-20140306		See point 9. above.
C Preparing the Sustainability Report - Including the SEA Requirements		
See comments above.		
D. Seek representations on the SA report from consultation bodies and the public Paragraph: 020 Reference ID: 11-020-20140306		The Scoping Report is clear and concise and poses questions for consultees to shape the methodology and focus of the SA.
E. Post adoption reporting and monitoring Paragraph: 025 Reference ID: 11-025-20140306	N/A	To be considered after adoption of the Plan. However, note point 9. above

APPENDIX 2

LAND AT NORTH WALLINGFORD SITE APPRAISAL

Review of the Sustainability Appraisal of the South Oxfordshire Local Plan (December 2018 report) - Wallingford Site Appraisal		
	Assessment	Commentary
	Key	
	✓✓	Significant positive effect
	✓	Minor positive effect
	0	No direct impact
	X	Minor negative effect
	XX	Significant negative effect
	?	Uncertain
Site Appraisal Review based on Sustainability Objectives		
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.	✓✓	Land promoted by L&Q Estates could provide approximately 350 dwellings, including affordable housing. The site is located adjacent to the settlement of Wallingford with future residents therefore able to access facilities and amenities provided in Wallingford. In addition, the existing transport infrastructure enables access to other nearby locations including Didcot and Oxford.
2. To help to create safe places for people to use and for businesses to operate, to reduce anti-social behaviour and reduce crime and the fear of crime.	✓	In accordance with the approach taken by Wood in the assessment of other sites, it is assumed that the site will be designed to help create safe places and will therefore have a positive effect upon this objective.
3. To improve accessibility for everyone to health, education, recreation, cultural, and community facilities and services.	✓✓	A primary school and public open space is proposed to be provided on the site with other amenities accessible on foot or by public transport. In addition new health facilities could be provided as part of the development.
4. To maintain and improve people's health, well-being, and community cohesion and support voluntary, community, and faith groups.	✓	Public open space, including a new memorial park, is proposed to be provided on the site. GP surgeries are accessible within Wallingford.
5. To reduce harm to the environment by seeking to minimise pollution of all kinds especially water, air, soil and noise pollution.	0	In accordance with the approach taken by Wood in the assessment of other sites, no effect anticipated.
6. To improve travel choice and accessibility, reduce the need to travel by car and shorten the length and duration of journeys.	✓	The majority of the site is located within approximately 400m of an existing bus stop. The development could support the expansion of routes in this area, including to serve the proposed primary school. The provision of a primary school and open space on site also reduces the need to travel to reach such facilities.
7. To conserve and enhance biodiversity.	X	No statutory conservation designations located on or within 2km of the site.
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.	XX/?	The site comprises grade 1-3 agricultural land and is located adjacent to the AONB. However, land to the north of the site is proposed to be retained in agricultural use to provide an extensive development offset from the AONB. In addition, open space including a memorial park is proposed to be located in the north of the site to create a buffer between the development and the AONB.
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.	0	The site is not located in a conservation area and there are no designated heritage assets within the site. No effects anticipated.
10. To seek to address the causes and effects of climate change by: a) securing sustainable building practices which conserve energy, water resources and materials; b) protecting, enhancing and improving our water supply where possible; c) maximizing the proportion of energy generated from renewable sources; and d) ensuring that the design and location of new development is resilient to the effects of climate change.	✓	In accordance with the approach taken by Wood in the assessment of other sites, potential for greenhouse gas emissions associated with the development of this site to be reduced and for renewable energy to be incorporated which will have a positive effect on this objective. Given the scale of development there could be significant potential for incorporation of renewable energy and energy efficiency measures on this site.
11. To reduce the risk of, and damage from, flooding.	X	The site is located entirely within Flood Zone 1. The Council's SFRA identifies a risk of surface water in a small percentage of the site. SUDS are proposed to be integrated within green corridors and low lying land to mitigate this risk. However, consistent with the approach taken by Wood in the assessment of other sites a minor negative effect is identified before mitigation is taken into consideration.
12. To seek to minimise waste generation and encourage the reuse of waste through recycling, compost, or energy recovery.	X	In accordance with the approach taken by Wood in the assessment of other sites, development of this site will result in an increase in waste, albeit that this could be mitigated to an extent by management of waste in accordance with the waste hierarchy.
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.	0	The uses proposed do not include employment. In accordance with the approach taken by Wood in the assessment of other sites, no effects in relation to this objective are therefore identified.
14. To support the development of Science Vale as an internationally recognised innovation and enterprise zone by: a) attracting new high value businesses; b) supporting innovation and enterprise; c) delivering new jobs; d) supporting and accelerating the delivery of new homes; and e) developing and improving infrastructure across the Science Vale area.	0	The site is located outside of the Science Vale Area.
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.	✓✓	A primary school is proposed to be provided on the site. There is a secondary school within approximately 700m of the site (Wallingford School).
16. To encourage the development of a buoyant, sustainable tourism sector.	0	In accordance with the approach taken by Wood in the assessment of other sites, no significant effects on tourism anticipated from the development of this site.
17. Support community involvement in decisions affecting them and enable communities to provide local services and solutions.	0	In accordance with the approach taken by Wood in the assessment of other sites, no significant effects on community involvement anticipated from the development of this site.

APPENDIX 3

LETTER TO SODC, DATED 17th AUGUST 2018

Ms. H. Jones,
Planning Policy Team Leader,
South Oxfordshire District Council,
135 Eastern Avenue,
Milton Park,
MILTON.
OX14 4SB

BY EMAIL & POST [REDACTED]

24709/A3/MK/slh

17th August 2018

Dear Ms. Jones,

SOUTH OXFORDSHIRE EMERGING LOCAL PLAN 2011-2033: PROCESS FOR CONSIDERING REASONABLE ALTERNATIVE/ADDITIONAL SITES

We write on behalf of Gallagher Estates relating to the promotion of land which it controls at North Wallingford. We write in connection to the emerging South Oxfordshire Local Plan and the work for considering alternative/additional site(s) which officers are undertaking.

We are aware that the process for the considering alternative/additional site(s) was summarised in a report to South Oxfordshire District Council's (SODC's) Cabinet on 10th May 2018, a copy of which is enclosed. The report lists sites which were assessed at previous stages of the emerging Local Plan process. North Wallingford is not listed as one of the sites.

The report (at paragraph 86) states that:

"It is not intended that a further Call for Sites process be undertaken as it is reasonable to expect that those alternatives have been promoted in anticipation of the submission of the Local Plan."

The report (at paragraph 87) adds that:

"There are sites in addition to the above which have been promoted since the Second Preferred Options stage through the Local Plan process which should be considered through any process for considering alternative/additional sites."

We understand that SODC intends to publish a report which provides a detailed explanation of the reasons for selecting those sites identified in the 10th May 2018 Cabinet report and any additional sites. Thus, it is unclear at this stage whether North Wallingford has been or will be included as an additional site.



We therefore set out the reasons why the site should be included as part of this process for considering additional/alternative sites, according with the approach noted in paragraph 87 of the Cabinet report.

Has the Site Been Considered and Assessed Previously?

You will be aware that Land at North Wallingford was promoted and considered as part of the South Oxfordshire Core Strategy process. A specific consultation relating to growth at Wallingford was undertaken in January-February 2010, details of which are available via SODC's website¹.

Subsequently, North Wallingford has also been promoted through each consultation on the emerging Local Plan. It should therefore should have been considered by SODC as a reasonable alternative.

Therefore, the exclusion of the site as part of the alternative/additional site(s) process is not justified on the basis of not having been promoted or assessed previously.

Has the Site Been Promoted Previously?

Subsequently, Land at North Wallingford has been promoted at each stage of consultation on the emerging Local Plan. This includes promotion by Barton Willmore LLP on behalf of Gallagher Estates at every stage since March 2015.

The site's exclusion from this process is not justified on the basis of not having been promoted or assessed previously.

Is the Site 'Strategic'?

North Wallingford comprises land which is controlled and promoted by Gallagher Estates (forming the western parcel) and Croudace Strategic (which forms the eastern parcel). In combination, the site presents an opportunity for the development of circa. 1,000 homes plus public open space and community infrastructure. This comprehensive approach to development at North Wallingford was the basis of the site's consideration through the Core Strategy process (as summarised above).

More recent site promotion, for Gallagher Estates and the adjoining developer, Croudace, has identified the potential for separate smaller-scale developments to be brought forward in this location. However, this does not preclude the opportunity for a comprehensive strategic development.

On this basis, the site's exclusion from this process is not justified. North Wallingford should therefore be added to the consideration of alternative/additional sites.

Is the Site Sustainably Located?

The 10th May 2018 Cabinet report does not identify any sites which are located at the Market Towns. The reasons for this are not set out explicitly within the report.

We understand that it is based upon the proposed approach set out in draft Policy H3 of the emerging Local Plan which proposes a total allocation of housing to each of the Market Towns – with 295 homes proposed for Wallingford². The allocation of sites to meet this requirement is deferred to the preparation of a future neighbourhood plan.

¹<http://www.southoxon.gov.uk/services-and-advice/planning-and-building/planning-policy/core-strategy/wallingford-consultation>

² The allocation of 295 homes is in addition to the Core Strategy allocation of Site B West of Wallingford

Notwithstanding the above, this process for considering additional/alternative sites should not ignore sites located on the edges of the Market Towns, identified within the strategy as amongst the most sustainable locations within South Oxfordshire District.

The proposed approach for Market Towns set out in the Publication version of the Local Plan (October 2017) should be reviewed, with strategic sites including North Wallingford, being included as part of this process, rather than Policy H4 of the emerging Local Plan acting as a constraint on this process. This pragmatic approach is reflected in the approach which has been adopted by SODC in identifying new alternative sites on the edge of Reading which did not form part of the proposed spatial strategy in the emerging Local Plan.

For the above reasons, we conclude that the exclusion of strategic sites at the Market Towns is not justified and the site should therefore be considered as part of this process.

Is the Site Deliverable?

Land at North Wallingford is controlled and has been actively promoted by our client, Gallagher Estates, and the adjoining developer, Croudace Strategic. There are no constraints to bringing the site forward for development now. Indeed, Gallagher Estates has undertaken a suite of environmental surveys and assessments to support the promotion of its land through the emerging Local Plan and the early stages of the Wallingford neighbourhood plan process.

The site is deliverable and could be brought forward within the first five years of the Local Plan's adoption. The site should therefore be considered favourably as a potential additional or alternative site.

Conclusion

For the reasons set out above, there is a risk that the preparation of the Local Plan could be flawed if North Wallingford is not included in this alternative/additional sites process. We therefore seek confirmation from SODC that Land at North Wallingford will be included through alternative/additional sites process.

Please contact the writer on 0118 943 0000 or by emailing michael.knott@bartonwillmore.co.uk should you wish to discuss this further or require any additional information.

Yours sincerely,



MICHAEL KNOTT
Director

Enc. SODC Cabinet Report (Agenda Item 5: South Oxfordshire Local Plan) dated 10th May 2018

cc. S. Field, Esq. - Gallagher Estates
M. Jenner, Esq. - Croudace Strategic