

Sustainability Appraisal of the West Oxfordshire Local Plan

Volume 2 of 3: Regulation 19 SA Report

July 2026



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

Sustainability Appraisal of the West Oxfordshire Local Plan 2043

Volume 2 of 3: Regulation 19 SA Report

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Acronyms and abbreviations

A&E	Accident and Emergency
ALC	Agricultural Land Classification
AONB	Area of Outstanding Natural Beauty
AQMA	Air Quality Management Area
BMV	Best and Most Versatile
BNG	Biodiversity Net Gain
CA	Conservation Areas
CNL	Cotswolds National Landscape
CO₂	Carbon dioxide
CWMP	Construction Waste Management Plan
DBEIS	Department for Business, Energy and Industrial Strategy
dpa	Dwellings per Annum
EU	European Union
EV	Electric Vehicle
GHG	Greenhouse Gas
GI	Green Infrastructure
GIS	Geographical Information Systems
GP	General Practitioner
Ha	Hectare
HER	Historic Environment Record
HLC	Historic Landscape Characterisation
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
IMD	Index of Multiple Deprivation
IRZ	Impact Risk Zone
kg	Kilogram
LB	Listed Building
LCA	Landscape Character Area
LEAP	Local Equipped Areas for Play
LGS	Local Geological Site
LHNA	Local Housing Needs Assessment
LNR	Local Nature Reserve
LNRN	Local Nature Recovery Network
LPA	Local Planning Authority
LSOA	Lower Super Output Area
LT	Landscape Type
LVA	Landscape and Visual Appraisal
LVIA	Landscape and Visual Impact Assessment
LWS	Local Wildlife Site
MHCLG	Ministry of Housing, Communities and Local Government
MSA	Mineral Safeguarding Area
NaPTAN	National Public Transport Access Nodes
NEAP	Neighbourhood Equipped Areas for Play
NHS	National Health Service

NNR	National Nature Reserve
NO₂	Nitrogen Dioxide
NPPF	National Planning Policy Framework
NRN	Nature Recovery Network
ONS	Office of National Statistics
OS	Ordnance Survey
OWMP	Operational Waste Management Plan
PDL	Previously Developed Land
PPP	Policies Plans and Programmes
PRoW	Public Rights of Way
RAF	Royal Air Force
RBMP	River Basin Management Plan
RPG	Registered Park and Garden
RTPI	Royal Town Planning Institute
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SDA	Strategic Development Area
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment
SM	Scheduled Monument
SPA	Special Protection Area
SPZ	Source Protection Zone
SSSI	Sites of Special Scientific Interest
STW	Sewage Treatment Works
SuDS	Sustainable Drainage System
SWFR	Surface Water Flood Risk
TPO	Tree Preservation Order
TVERC	Thames Valley Environmental Records Centre
UK	United Kingdom
WCS	Water Cycle Study
WFD	Water Framework Directive
WHS	World Heritage Site
WODC	West Oxfordshire District Council
WRMP	Water Resource Management Plan
ZOI	Zone of Influence
HELAA	Housing and Economic Land Availability Assessment

1 Introduction

1.1 Purpose of this report

1.1.1 Lepus Consulting Ltd (Lepus) has been commissioned by West Oxfordshire District Council (WODC) to undertake a Sustainability Appraisal (SA) process, incorporating the requirements of Strategic Environmental Assessment (SEA), to support the preparation of the new West Oxfordshire Local Plan 2043.

1.1.2 This Regulation 19 SA Report has been prepared to present full details of the SA process to date and inform WODC's preparation of the Local Plan. There are four key purposes of the SA process at this stage of the plan making process are shown in **Figure 1.1**.



Figure 1.1: Key purposes of the SA process

1.1.3 This SA report is one of a series of reports that have been prepared to document the iterative SA process. Such an approach enables the Council to demonstrate that it has identified, described and evaluated reasonable alternatives during the making of the Local Plan. **Chapter 2** provides further details of the SA process to date.

1.2 Sustainability Appraisal

1.2.1 A sustainability appraisal (SA) is a systematic process that must be carried out during the preparation of local plans and spatial development strategies¹. The role of SA is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.

1.2.2 The SA process provides an opportunity to consider ways by which the plan can contribute to sustainability improvements, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. By doing so, it can help make sure that the proposals in the plan are appropriate when compared to reasonable alternatives. It can be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met. SA should be applied as an iterative process informing the development of the plan.

¹ MHCLG (2025) Government guidance on plan making. Available at: <https://www.gov.uk/guidance/plan-making> [Date accessed: 25/03/26]

1.3 Strategic Environmental Assessment

- 1.3.1 Strategic Environmental Assessment (SEA) seeks to ensure that environmental considerations are part of the process of preparing certain plans and programmes. Its purpose is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes, with a view to promoting sustainable development. SEA considers only the environmental effects of a plan, whereas sustainability appraisal considers the plan's wider economic and social effects in addition to its potential environmental impacts².
- 1.3.2 In the SEA procedure, an environmental report is prepared in which the likely significant effects on the environment of the proposed plan or programme and its reasonable alternatives are identified. The public and relevant environmental authorities are informed and consulted on the draft plan or programme and the environmental report.

1.4 Integrated approach to SA and SEA

- 1.4.1 The SEA Directive applies to a wide range of public plans and programmes, including land use plans (see Article 3(2)) of the SEA Directive³). The Directive has been transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations, SI no. 1633⁴).
- 1.4.2 SEA is a systematic process for evaluating the environmental consequences of proposed plans or programmes to ensure environmental issues are fully integrated and addressed at the earliest appropriate stage of decision-making. The SEA Directive and SEA Regulations require an environmental report in which the likely significant effects on the environment are identified for local plan proposals and reasonable alternatives.
- 1.4.3 SA is a UK-specific procedure used to appraise the impacts and effects of development plans in the UK. It is required by S19 (5) of the Planning and Compulsory Purchase Act 2004 and should be an appraisal of the economic, social and environmental sustainability of development plans. The present statutory requirement for SA lies in The Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.4.4 This Regulation 19 SA Report has been prepared to meet the requirements of an SEA Environmental Report.
- 1.4.5 The West Oxfordshire Local Plan is at the plan-making stage Regulation 19, known as 'Publication' in the Local Plan Regulations 2012⁵, as shown in Stage C of **Figure 1.2**.

² MHCLG (2020) Strategic environmental assessment and sustainability appraisal. Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Date accessed: 25/03/26]

³ Directive 2001/42/EC of the European Parliament of the Council of 27 June 2001 (SEA Directive). Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32001L0042> [Date accessed: 25/03/26]

⁴ The Environmental Assessment of Plans and Programmes Regulations (2004). Available at: <http://www.legislation.gov.uk/ukSI/2004/1633/contents/made> [Date accessed: 25/03/26]

⁵ The Town and Country Planning (Local Planning) (England) Regulations 2012. SI 767.

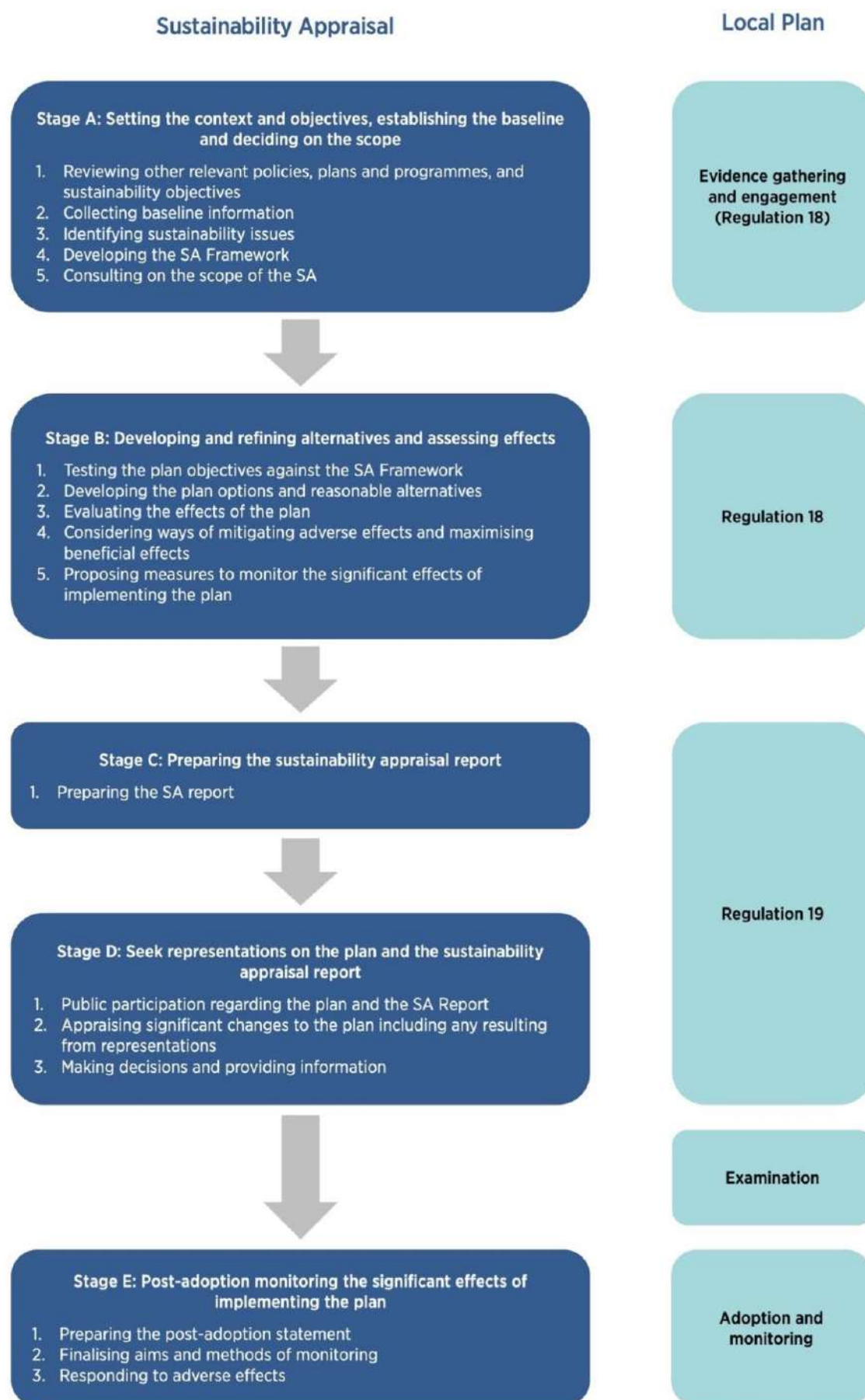


Figure 1.2: Sustainability appraisal process alongside local plan stages

1.5 Legislative context

- 1.5.1 When submitting their local plan to the Secretary of State, section 19(5) of the Planning and Compulsory Purchase Act⁶ requires that local planning authorities (LPAs) must have prepared and be able to submit an SA at the same time.
- 1.5.2 The Environmental Assessment of Plans and Programmes Regulations⁷ (SEA Regulations) require that Strategic Environmental Assessments be prepared for a wide range of plans and programmes, including Local Plans.
- 1.5.3 Planning Practice Guidance (PPG) advocates that the SA process should integrate the requirements of the SEA Regulations. On this basis, this SA report incorporates the requirements of the SEA regulations.
- 1.5.4 PPG on SEA and SA⁸ states: “Sustainability appraisals incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the ‘Strategic Environmental Assessment Regulations’). Sustainability appraisal ensures that potential environmental effects are given full consideration alongside social and economic issues”.

1.6 How to read and understand the R19 SA Report

- 1.6.1 This report should be read alongside the Regulation 19 version of the West Oxfordshire Local Plan. The various appendices provide essential contextual information to the main body of the report. The contents of this SA Report are as follows:

- **VOLUME 1: Non-Technical Summary** provides a summary of the Regulation 19 SA work.
- **VOLUME 2: Main SA Report** (this document)
 - **Chapter 1** presents an introduction to this report.
 - **Chapter 2** sets out information about the West Oxfordshire Local Plan and the SA process to date.
 - **Chapter 3** presents the evolution of the environment without the Local Plan.
 - **Chapter 4** sets out the SA methodology.
 - **Chapter 5** presents details of the reasonable alternatives considered throughout the SA process.
 - **Chapter 6** presents details on the preferred approach as set out in the Local Plan.
 - **Chapters 7 to 15** set out the likely significant effects on the environment, per SEA topic.
 - **Chapter 16** presents the cumulative effects assessment.
 - **Chapter 17** sets out a range of monitoring recommendations for the Local Plan.
 - **Chapter 18** summarises ways in which the SA has influenced the Local Plan throughout the plan making process, including through recommendations made in the SA.

⁶ Planning and Compulsory Purchase Act 2004. Available at: <https://www.legislation.gov.uk/ukpga/2004/5/contents> [Date accessed: 25/03/26]

⁷ The Environmental Assessment of Plans and Programmes Regulations 2004. Available at: <http://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 25/03/26]

⁸ MHCLG (2020) Guidance: Strategic environmental assessment and sustainability appraisal. Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Date accessed: 25/03/26]

- **Chapter 19** outlines the conclusions, residual effects and next steps.
- **VOLUME 3: Appendices**
 - **Appendix A** sets out the SA Framework.
 - **Appendix B** presents a review of other relevant policies, plans and programmes (PPPs).
 - **Appendix C** summarises the consultation responses received relating to the SA at each stage and how they have been considered in the SA process.
 - **Appendix D** presents the assessment of new housing and employment growth options.
 - **Appendix E** provides additional context to **Chapter 4** of the main Regulation 19 SA Report regarding the topic-specific methodologies and assumptions applied in the assessment of reasonable alternative sites.
 - **Appendix F** presents the assessment of reasonable alternative strategic sites.
 - **Appendix G** presents the assessment of reasonable alternative non-strategic sites.
 - **Appendix H** presents the assessment of the Local Plan policies.
 - **Appendix I** sets out WODC's outline reasons for selection and rejection of reasonable alternative sites.

2 About the Local Plan and sequencing of the SA process

2.1 Geography of the Plan area

- 2.1.1 West Oxfordshire District lies in the south east of England, within Oxfordshire County, covering an area of approximately 71,444ha (see **Figure 2.1**). The district is primarily rural in character, with roughly a third of the district in the north west falling within the Cotswolds Area of Outstanding Natural Beauty (AONB) (now known as the Cotswolds National Landscape).
- 2.1.2 The Plan area contains three main towns (Witney, Carterton and Chipping Norton) and six rural service centres (Bampton, Burford, Charlbury, Eynsham, Long Hanborough and Woodstock), with a number of scattered villages and hamlets. The City of Oxford lies adjacent to the district in the east, with a small proportion of Oxford's Green Belt falling within the district. The latest population estimates record approximately 120,941 people living within West Oxfordshire⁹, the majority of whom live in the main towns.
- 2.1.3 The district has a strong and diverse economy, with a history of engineering and manufacturing. Notable features of the district's built environment include various heritage assets, including several historic market towns and villages, and Blenheim Palace World Heritage Site (WHS), which also play an important role in the visitor economy and strong rural tourism sector.
- 2.1.4 The River Thames follows the southern boundary of the district, with various tributaries including the Windrush and Evenlode flowing through the district. These rivers form important ecological corridors alongside the network of ancient woodland and other nature conservation designations, including a small section of the Oxford Meadows Special Area of Conservation (SAC) in the east of the district.

⁹ ONS (2025) Estimates of the population for England and Wales: Mid-2024 local authority population estimates. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/estimatesofthepopulationforenglandandwales> [Date accessed: 25/03/26]

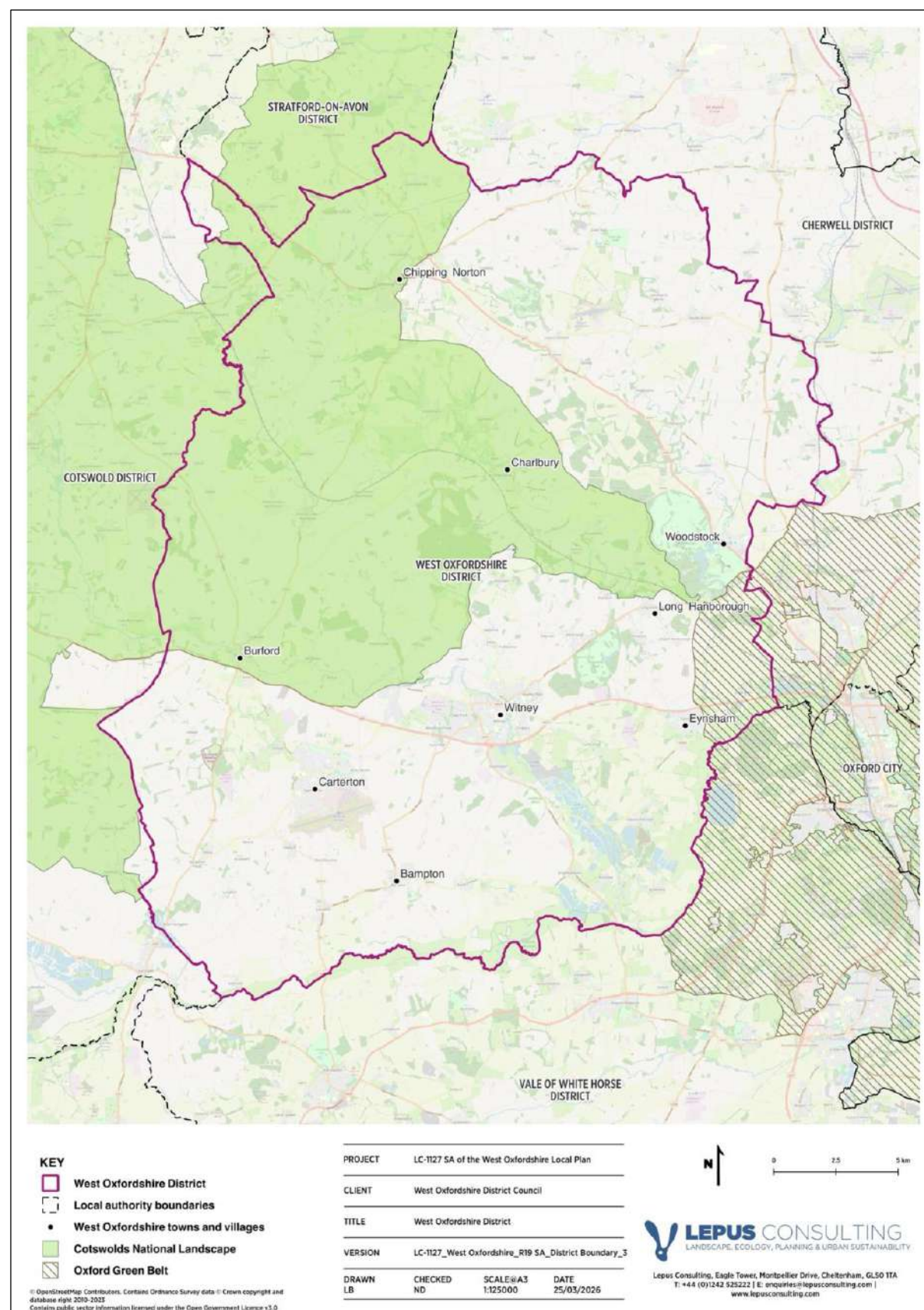


Figure 2.1: The West Oxfordshire Local Plan area

2.2 The West Oxfordshire Local Plan

- 2.2.1 The West Oxfordshire Local Plan 2043 will set out a vision, objectives and framework for the future development of the district, enabling needs and opportunities to be identified and decisions made on key issues such as how much development takes place and where, what infrastructure is needed and how positive outcomes such as environmental enhancements can best be achieved.
- 2.2.2 To date, WODC have held four public consultations to help shape the emerging Local Plan, details of which can be found on the Council's website¹⁰:
- **'Scoping'** (2022) high-level consultation paper to seek early views on the potential scope for the new Local Plan with various open questions under six core themes;
 - **'Ideas and Objectives'** (2023) consultation paper presenting a series of initial draft plan objectives, potential policy topics to cover, eight potential scenarios for the overall spatial strategy, and inviting suggestions on potential land uses across the district via a 'call for sites' exercise; and
 - **'Preferred Policy Options'** (2025) consultation paper set out the Council's emerging preferred approach, with a draft vision and objectives for the district at the end of the Plan period and a series of preferred policy approaches to address the challenges to be faced over the coming years.
 - **'Preferred Spatial Options'** (2025) consultation paper set out proposed updates to the settlement hierarchy and spatial strategy, and identified potential new and existing sites for housing and employment development.
- 2.2.3 Once adopted, the Local Plan will form part of the statutory development plan for the district covering the period up to 2043, replacing and updating the current West Oxfordshire Local Plan 2031 (adopted 2018)¹¹.

2.3 The iterative SA process

- 2.3.1 **Figure 2.2** provides a summary of the main plan making stages and SA outputs that were prepared at each stage. Comments received during each consultation stage relating to the SA, and how these comments have been considered during the SA process, are summarised in **Appendix C**.
- 2.3.2 The preparation of a Scoping Report was the first phase of the SA process, which set the criteria for assessment (including the SA Objectives) and established the baseline data and key sustainability issues for West Oxfordshire, including a review of relevant policies, programmes and plans (PPPs). The output of the scoping phase was the SA Scoping Report, which was consulted on between 30th April and 4th June 2024 with the statutory bodies Natural England, Historic England and the Environment Agency and updated in August 2024¹².

¹⁰ West Oxfordshire District Council Local Plan 2043 – preparation of a new plan. Available at: <https://www.westoxon.gov.uk/planning-and-building/planning-policy/local-plan-2043/> [Date accessed: 25/03/26]

¹¹ West Oxfordshire District Council (2018) West Oxfordshire Local Plan 2031. Available at: <https://www.westoxon.gov.uk/planning-and-building/planning-policy/local-plan-2031/> [Date accessed: 25/03/26]

¹² Lepus Consulting (2024) Sustainability Appraisal of the West Oxfordshire Local Plan 2041: Scoping Report, Final – August 2024. Available at <https://www.westoxon.gov.uk/media/n2sjfpi0/sustainability-appraisal-of-the-west-oxfordshire-local-plan-scoping-report-august-2024.pdf> [Date accessed: 25/03/26]

- 2.3.3 At the second stage of the SA process, the Regulation 18 Preferred Policy Options SA Report¹³ was prepared to evaluate reasonable alternatives for the overall level of housing and employment growth and spatial strategy, and draft policies identified by WODC in the preparation of their 'Preferred Policy Options' consultation document. The Preferred Policy Options Consultation was held between 26th June and 8th August 2025.
- 2.3.4 The third SA output was the Regulation 18 Preferred Spatial Options SA Report¹⁴, the purpose of which was to evaluate the likely sustainability effects of reasonable alternative development sites, as well as one additional spatial option and two updated policies identified by WODC since the previous stage, to help the plan makers in their decision making as the Local Plan progresses. The Preferred Spatial Options Consultation was held between 3rd November and 22nd December 2025.
- 2.3.5 This Regulation 19 SA Report draws on the information gathered and evaluation carried out during the SA process to date, and presents the assessment of updated Local Plan policies and new/amended reasonable alternatives that have come forward since the Regulation 18 stage. This report also provides WODC's updated outline reasons for selecting and rejecting reasonable alternative sites and options, taking into account the latest evidence.

¹³ Lepus Consulting (2025) Sustainability Appraisal of the West Oxfordshire Local Plan 2041: Regulation 18 Preferred Policy Options. June 2025. Available at: <https://www.westoxon.gov.uk/media/qi1puvnm/sustainability-appraisal-of-the-west-oxfordshire-local-plan-preferred-options-june-2025.pdf> [Date accessed: 25/03/26]

¹⁴ Lepus Consulting (2025) Sustainability Appraisal of the West Oxfordshire Local Plan 2043: Regulation 18 Preferred Spatial Options. October 2025. Available at: <https://www.westoxon.gov.uk/media/bjib5i14/local-plan-sustainability-appraisal-preferred-spatial-options-october-2025.pdf> [Date accessed: 25/03/26]

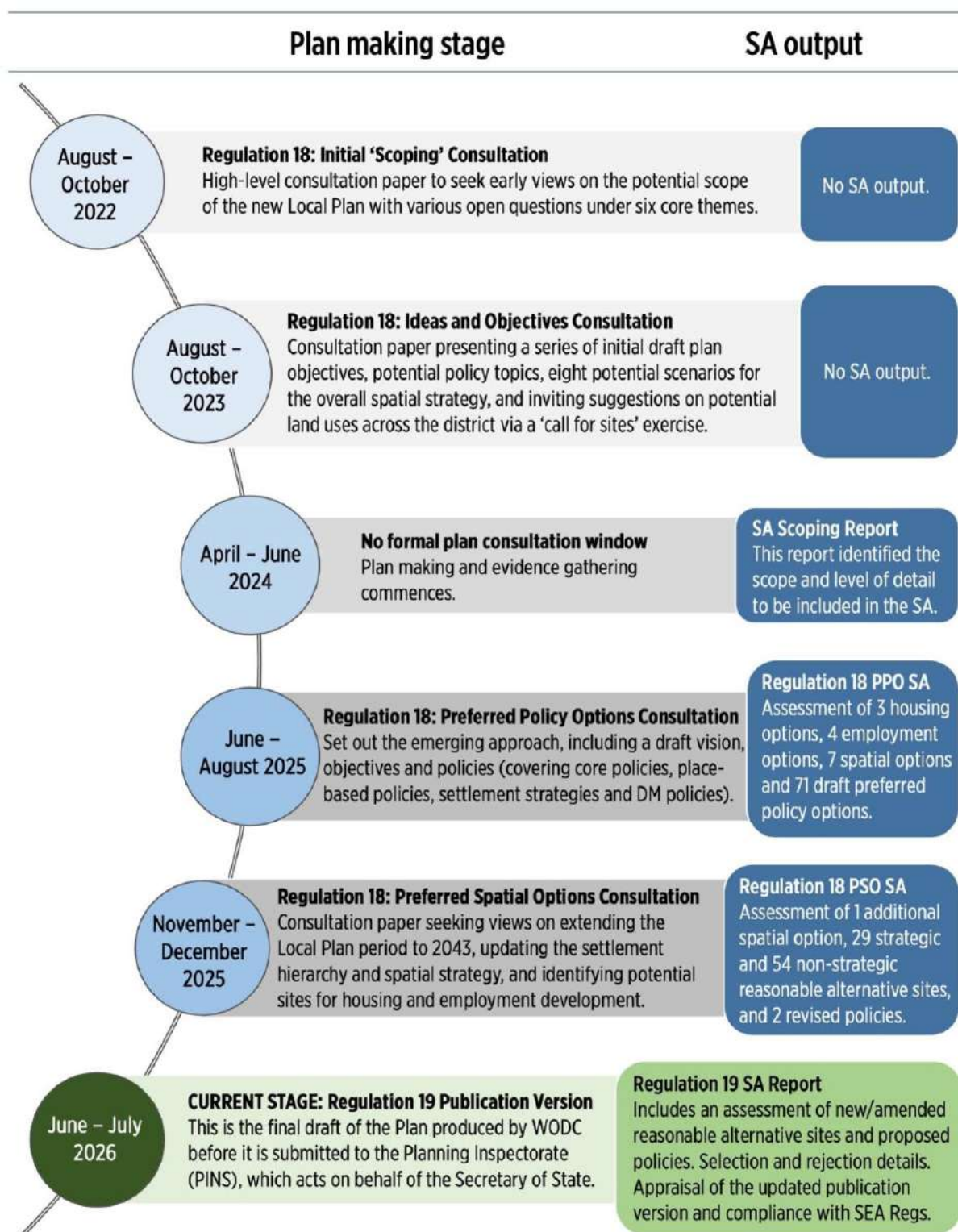


Figure 2.2: The West Oxfordshire Local Plan and SA process

2.4 Meeting the requirements of the SEA Regulations

- 2.4.1 There are certain requirements that this report must satisfy in order for it to qualify as an ‘environmental report’, as set out in the SEA Regulations. These requirements, and where in the report they have been met, are presented in **Figure 2.3**.



Figure 2.3: SEA Checklist

3 Evolution of the environment without the Local Plan

3.1 Overview

- 3.1.1 The SEA Regulations requires the Environmental Report to present “*information on the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme*”.
- 3.1.2 Without the Local Plan, no new plan-led development would occur within the West Oxfordshire area over and above that which is currently proposed in the adopted Local Plan 2031¹⁵. In this scenario, an appeal-led system would predominate. The nature and scale of development that may come forward under an appeal-led system is uncertain. However, in a ‘no plan’ scenario, other plans and policies would continue to be a material consideration in planning decisions and legislative protection would continue to be in place.
- 3.1.3 **Table 3.1** considers the likely evolution of the baseline within West Oxfordshire in the absence of the emerging Local Plan, considering information gathered at the Scoping stage as well as more up-to-date data and statistics.

Table 3.1: Likely evolution without the West Oxfordshire Local Plan

SEA topic	Likely evolution of the environment without the Local Plan
Air	- The Oxfordshire Local Transport and Connectivity Plan (LTCP) and other local strategies will still be implemented, with potential benefits for air quality as a consequence of the proposed improvements to Oxfordshire’s road network and public transport infrastructure. However, there may be less opportunity for local guidance and strategies to implement and monitor this effectively and integrate with new development proposals without the Local Plan. - Although national trends suggest there is an increasing uptake of lower emission vehicle types, including electric and hybrid vehicles, which will be likely to help limit road transport associated emissions in the West Oxfordshire area, in absence of the Plan there may be reduced scope to implement and monitor effective policies and strategies which can facilitate alternative transport modes and encourage behavioural changes to improve air quality.
Biodiversity, flora and fauna	- Sites designated for their national and international biodiversity value would continue to benefit from legislative protection. The NPPF and its policies relating to biodiversity would continue to be material considerations in planning decisions. - Whilst 10% BNG will remain mandatory for all Town and Country Planning Act developments as of 12th February 2024, without the Local Plan there may be more limited opportunities to strive for higher BNG targets or other biodiversity enhancement measures and there may be less opportunity to establish a strategically planned GI network, and/or potential habitat banks for delivering compensatory BNG off-site, where on-site delivery is proved to be unviable. - Long-term declines in farmland and woodland biodiversity are likely to continue without intervention. Although the LNRS will still be implemented as required through the Environment Act, without the Local Plan there may be less opportunity to ensure that development is of appropriate type, scale and location to avoid

¹⁵ WODC (2018) West Oxfordshire Local Plan 2031. Available at: <https://www.westoxon.gov.uk/planning-and-building/planning-policy/local-plan-2031/> [Date accessed: 25/03/26]

SEA topic	Likely evolution of the environment without the Local Plan
	adverse impacts on either biodiversity designations or on the functioning ecological network and the ecosystem services this provides.
Climatic factors	• Climatic and anthropogenic-induced climate change are increasing concerns nationally and globally. Without a clear strategy to reduce emissions across all sectors at the local level, West Oxfordshire's contributions towards the causes of climate change may be exacerbated, particularly policies and strategies to facilitate and encourage a modal shift away from private car use. • It is likely that flooding and extreme weather events will be exacerbated over time by increased impacts of climate change. Although national policies will continue to restrict development within flood zones, there may be less control over the location of growth without the Plan, which could limit the effectiveness of GI networks and the implementation of water management infrastructure. • Green and blue infrastructure is likely to have limited quality and accessibility if there is no management or growth strategy for its long-term provision and maintenance. • It is likely that emissions will continue to decrease over time, owing to technological advances such as renewables and more efficient energy generation, as well as sustainable transport initiatives set out in the Oxfordshire LTCP. However, without the Local Plan, there may be less scope to implement zero and low carbon policies or seek aspirational energy efficiency targets in West Oxfordshire. • The Oxfordshire LTCP and its policies, alongside related plans such as the Mobility Hub Strategy, will still be implemented depending on whether funding is secured from new development. The LTCP seeks to relieve congestion and improve public transport and active travel provision, and proposed improvements to the North Cotswold Line and Hanborough Station are expected to increase rail connectivity. However, without the Local Plan, there may be reduced scope for local guidance to effectively implement, monitor and integrate these measures with new development. This may limit opportunities to support modal shift towards more sustainable transport modes and constrain associated reductions in GHG emissions.
Cultural Heritage	• National and local guidance to protect designated assets and their settings such as Listed Buildings, Conservation Areas, Scheduled Monuments, and Registered Parks and Gardens, which would continue with or without the West Oxfordshire Local Plan. • The Heritage at Risk Register will continue to be managed by Historic England who will continue to work with stakeholders to protect these assets, although there could be less opportunity to focus on regeneration and investment without the West Oxfordshire Local Plan. • Without the West Oxfordshire Local Plan, opportunities to promote connectivity with places and to protect and emphasise local distinctiveness and culture may be lost or reduced.
Human health	• West Oxfordshire's population is expected to continue to rise, putting greater pressure on the capacity of healthcare services, open spaces and leisure facilities. • Rising life expectancies and a decreasing population of those of working age is leading to an ageing population in West Oxfordshire. This is likely to increase demand on housing and healthcare services to cater for their specific care needs. It may be more difficult to ensure these needs are met in the absence of the West Oxfordshire Local Plan. • Without a clear plan-led development strategy, it is uncertain if existing public green spaces and open spaces would be maintained or enhanced to encourage residents

SEA topic	Likely evolution of the environment without the Local Plan
	to live healthy and active lifestyles. Existing open spaces may be under greater pressure from windfall development without the West Oxfordshire Local Plan.
Landscape	- The area of West Oxfordshire which lies within the Cotswolds National Landscape will continue to benefit from legislative protection, however the absence of Plan-led development and a clear policy direction may lead to there being less opportunity to promote conservation and enhancement of the National Landscape and its setting. - There may be an increased likelihood for a rise in development which sits in discord with the local landscape character, or have little regard for the capacity of areas of high landscape sensitivity. - As the Green Belt is not a statutory landscape designation, the absence of a Local Plan could make it more at risk of having its openness and tranquillity disturbed by encroachment and pollution from new development.
Population and material assets	- Without the West Oxfordshire Local Plan, it is unlikely that the identified housing needs would be met. This has potential to increase issues of homelessness and overcrowding, or force residents to move outside the area. A lack of housing provision could also restrict people from moving to the area, which may hinder economic growth. - It is likely that unemployment levels would increase, as there may be limited job availability in some sectors if land is not allocated through the West Oxfordshire Local Plan. This also has potential to increase the numbers of commuters travelling outside the Plan area. - In the absence of plan-led development, there may be less scope to implement and manage sufficient health, education, social and transport infrastructure to meet the needs of a rising population. - Without the influence of the West Oxfordshire Local Plan, less planning control would be exercised over the location of new developments. This gives potential for new sites to be developed in unsuitable locations without the necessary supporting infrastructure, which may exacerbate issues of social exclusion and access to key services. - It is likely that more pressure would be placed on the capacity of local schools, reducing their ability to provide a quality education. - Housing costs are likely to continue to rise, making it difficult for residents to move onto the property ladder and exacerbating inequalities. It is unlikely that sufficient affordable housing would be delivered to meet identified needs. - It is likely that the quantity of waste sent to Ardley Energy Recovery Facility will continue to increase as the population in West Oxfordshire rises. - The Oxfordshire LTCP and its policies, alongside related plans such as the Mobility Hub Strategy, will still be implemented depending on whether funding is secured from new development. The LTCP seeks to relieve congestion on the road network and improve provision of public transport and active travel infrastructure across the Plan area. In the absence of the Local Plan, there may be reduced scope to implement and monitor effective policies and strategies which can facilitate alternative transport modes and encourage behavioural changes, potentially limiting improvements in accessibility and connectivity for communities.
Soil	- Greenfield sites and BMV soil are likely to be lost in higher quantities if development is not controlled through the West Oxfordshire Local Plan. - Rates of soil erosion and loss of soil fertility will be likely to continue to rise due to the impacts of agriculture and climate change.

SEA topic	Likely evolution of the environment without the Local Plan
Water	• Water abstraction, consumption and treatment in the local area will continue to be managed by the Environment Agency and Thames Water. However, without planned development, there may be less potential to positively plan with regard to water resources and avoid contributing to over-capacity issues at wastewater treatment works. • The efficiency and sustainability of water consumption may be unlikely to improve as water demand increases. This is also contingent on the nature of any future changes to national regulations, such as the Building Regulations and any emerging policy or regulations relating to water neutrality. • Without the Local Plan and co-ordination with neighbouring districts, the River Thames is likely to be subject to further pressures from development and water abstraction. • Water quality is likely to continue to deteriorate without intervention, and a clear plan-led development strategy working with neighbouring authorities and organisations.

4 Methodology

4.1 Scope of the Sustainability Appraisal

4.1.1 The purpose of the SA Scoping Report is to establish the scope of the sustainability appraisal. It includes information about:

- The SA Framework (see **Appendix A**);
- Relevant plans, programmes and their environmental objectives which may have a bearing on the SA of the West Oxfordshire Local Plan (see **Appendix B** for further information);
- Baseline information; and
- Environmental issues and problems.

4.1.2 The SA Scoping Report was prepared by Lepus in 2025, and was subject to consultation between 30th April and 4th June 2024 with the statutory bodies Natural England, Historic England and the Environment Agency and updated in August 2024¹⁶. **Appendix C** presents a summary of comments received during each stage of consultation on the SA, including the Scoping Report.

4.1.3 The appraisal uses objective geographic information relating to environmental receptors, the SA Framework and established standards (where available) to help make the assessment decisions transparent and robust.

4.1.4 The SA Framework is comprised of SA Objectives and decision-making criteria. Acting as yardsticks of sustainability performance, the SA Objectives are designed to represent the topics identified in Schedule 2 of the SEA Regulations¹⁷. The SA Objectives and the SEA Topics to which they relate are set out in **Table 4.1**.

4.1.5 Each SA Objective is considered when appraising the Local Plan site allocations, policies and reasonable alternatives. The order of SA Objectives in the SA Framework does not infer prioritisation. The SA Objectives are at a strategic level and can potentially be open-ended. In order to focus each objective, decision making criteria are presented in the SA Framework to be used during the appraisal of policies and sites.

¹⁶ Lepus Consulting (2024) Sustainability Appraisal of the West Oxfordshire Local Plan 2041: Scoping Report, Final – August 2024. Available at <https://www.westoxon.gov.uk/media/n2sifpi0/sustainability-appraisal-of-the-west-oxfordshire-local-plan-scoping-report-august-2024.pdf> [Date accessed: 25/03/26]

¹⁷ Schedule 2 of the SEA Regulations identifies the likely significant effects on the environment, including “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 interrelationship between the issues referred to in sub-paragraphs (a) to (l).”

Table 4.1: Summary of the SA Objectives

	SA Objective	Relevance to SEA Regulations – Schedule 2
1	Climate change mitigation: Minimise West Oxfordshire District's contributions towards the causes of climate change	Climatic factors
2	Climate change adaptation: Adapt to the anticipated levels of climate change	Climatic factors and water
3	Biodiversity and geodiversity: Conserve, enhance and restore the district's biodiversity and geodiversity	Biodiversity, flora and fauna
4	Landscape: Conserve, enhance and manage the quality and character of landscapes and townscapes	Landscape
5	Cultural heritage: Conserve and enhance the significance of heritage assets and support the effective management of the historic environment	Cultural heritage
6	Air quality: Protect and improve air quality, creating cleaner and healthier air	Air
7	Water: Maintain and improve water quality and ensure efficient use of water resources	Water
8	Natural resources and waste: Ensure efficient use of the district's soil and mineral resources and reduce waste	Soil and material assets
9	Housing and equality: Provide affordable, high quality and environmentally sound housing for all, whilst reducing crime and social deprivation	Population, human health and material assets
10	Health and wellbeing: Safeguard and improve health and wellbeing and reduce inequalities in health	Population and human health
11	Transport and accessibility: Improve accessibility, increase the proportion of travel by sustainable modes, and reduce the need to travel	Population and material assets
12	Education: Increase access to education and improve attainment to develop and maintain a skilled workforce	Population and material assets
13	Economy and employment: Ensure sufficient employment land and premises are available to develop and support innovative and sustainable economic growth	Population and material assets

4.2 Best practice guidance

4.2.1 Government policy recommends that both SA and SEA are undertaken under a single SA process, which incorporates the requirements of the SEA Regulations. This can be achieved through integrating the requirements of SEA into the SA process. The approach for carrying out an integrated SA and SEA is based on best practice guidance:

- European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment¹⁸.
- Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive¹⁹.
- Ministry of Housing, Communities & Local Government (MHCLG) (2024) National Planning Policy Framework (NPPF)²⁰.
- MHCLG (2024) Planning Practice Guidance (PPG)²¹.
- Royal Town Planning Institute (RTPI) (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans²².

4.3 Appraisal process

4.3.1 The purpose of this document is to provide an appraisal of the West Oxfordshire Local Plan including reasonable alternatives in line with Regulation 12 of the SEA Regulations²³ which states that:

4.3.2 *“Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report ... [which] shall identify, describe and evaluate the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme”.*

4.3.3 This document also provides information in relation to the likely characteristics of effects, as per the SEA Regulations (see **Box 4.1**).

¹⁸ European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment. Available at: http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf [Date accessed: 25/03/26]

¹⁹ Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf [Date accessed: 25/03/26]

²⁰ MHCLG (2024) National Planning Policy Framework, December 2024. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> [Date accessed: 25/03/26]

²¹ MHCLG (2024) Planning practice guidance. Available at: <https://www.gov.uk/government/collections/planning-practice-guidance> [Date accessed: 25/03/26]

²² RTPI (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: <https://www.rtpi.org.uk/media/wwbpxmrt/sea-sapRACTICEadvicefull2018c.pdf> [Date accessed: 25/03/26]

²³ The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Available at: <https://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 25/03/26]

Box 4.1: Schedule 1 of the SEA Regulations

Criteria for determining the likely significance of effects (Schedule 1 of SEA Regulations)

The characteristics of plans and programmes, having regard, in particular, to:

- the degree to which the plan or programme sets out a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;
- the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
- the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
- environmental problems relevant to the plan or programme; and
- the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).

Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:

- the probability, duration, frequency and reversibility of the effects;
- the cumulative nature of the effects;
- the transboundary nature of the effects;
- the risks to human health or the environment (e.g. due to accidents);
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- the value and vulnerability of the area likely to be affected due to:
 - special natural characteristics or cultural heritage;
 - exceeded environmental quality standards or limit values;
 - intensive land-use; and
- the effects on areas or landscapes which have a recognised national, Community or international protection status.

4.4 Impact assessment and determination of significance

4.4.1 Significance of effect is a combination of the sensitivity of receptors and the magnitude of anticipated impacts. Sensitivity can be expressed in relative terms, based on the principle that the more sensitive the resource, the greater the magnitude of the change, and as compared with the do-nothing comparison, the greater will be the significance of effect.

Sensitivity

4.4.2 Sensitivity has been measured through consideration as to how the receiving environment will be impacted by a plan proposal. This includes assessment of the value and vulnerability of the receiving environment, whether or not environmental quality standards will be exceeded, and, for example, if impacts will affect designated areas or landscapes.

4.4.3 A guide to the range of scales used in determining sensitivity is presented in **Table 4.2**. For most receptors, sensitivity increases with geographic scale.

Table 4.2: Impact sensitivity

Scale	Typical criteria
International/ national	Designations that have an international aspect or consideration of transboundary effects beyond national boundaries. This applies to effects and designations/receptors that have a national or international dimension.

²⁴ The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Available at: <https://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 25/03/26]

Scale	Typical criteria
Regional	This includes the regional and sub-regional scale, including county-wide level and regional areas.
Local	This is the district and neighbourhood scale.

Magnitude

- 4.4.4 Magnitude relates to the degree of change the receptor will experience, including the probability, duration, frequency and reversibility of the impact. Impact magnitude has been determined on the basis of the susceptibility of a receptor to the type of change that will arise, as well as the value of the affected receptor (see **Table 4.3**).

Table 4.3: Impact magnitude

Impact magnitude	Typical criteria
High	- Likely total loss of or major alteration to the receptor in question; - Provision of a new receptor/feature; or - The impact is permanent and frequent.
Medium	Partial loss/alteration/improvement to one or more key features; or The impact is one of the following: - Frequent and short-term; - Frequent and reversible; - Long-term (and frequent) and reversible; - Long-term and occasional; or - Permanent and occasional.
Low	Minor loss/alteration/improvement to one or more key features of the receptor; or The impact is one of the following: - Reversible and short-term; - Reversible and occasional; or - Short-term and occasional.

4.5 Significant effects

- 4.5.1 In the SA process, a single value from **Table 4.4** has been allocated to each SA Objective for each aspect of the Local Plan that has been assessed. Justification for the classification of the impact for each SA Objective is presented in an accompanying narrative assessment text. This approach has been used in the assessment of all aspects of the Local Plan including all reasonable alternatives, options and policies.
- 4.5.2 The assessment of impacts and subsequent evaluation of significant effects is in accordance with Schedule 2 (6) of the SEA Regulations²⁵, where feasible, which states that the effects should include: “*secondary, cumulative, synergistic, short, medium and long-term effects, permanent and temporary effects, positive and negative effects, cumulative and synergistic effects*”.

Table 4.4: Guide to scoring significant effects

²⁵ The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Available at: <https://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 25/03/26]

Significance	Definition (not necessarily exhaustive)
Major Negative --	The size, nature and location of a development proposal would be likely to: • Permanently degrade, diminish or destroy the integrity of a quality receptor, such as a feature of international, national or regional importance; • Cause a very high-quality receptor to be permanently diminished; • Be unable to be entirely mitigated; • Be discordant with the existing setting; and/or • Contribute to a cumulative significant effect.
Minor Negative -	• The size, nature and location of development proposals would be likely to: • Not quite fit into the existing location or with existing receptor qualities; and/or • Affect undesignated yet recognised local receptors.
Negligible 0	Either no impacts are anticipated, or any impacts are anticipated to be negligible.
Uncertain +/-	It is uncertain whether impacts would be positive or adverse.
Minor Positive +	The size, nature and location of a development proposal would be likely to: • Improve undesignated yet recognised receptor qualities at the local scale; • Fit into, or with, the existing location and existing receptor qualities; and/or • Enable the restoration of valued characteristic features.
Major Positive ++	The size, nature and location of a development proposal would be likely to: • Enhance and redefine the location in a positive manner, making a contribution at a national or international scale; • Restore valued receptors which were degraded through previous uses; and/or • Improve one or more key elements/features/characteristics of a receptor with recognised quality such as a specific international, national or regional designation.

4.5.3 When selecting a single value to best represent the sustainability performance, and to understand the significance of effects of an option in terms of the relevant SA Objective, the precautionary principle²⁶ has been used. This is a worst-case scenario approach. If a positive effect is identified in relation to one criterion within the SA Framework (see the decision-making criteria of the SA Framework in **Appendix A**) and a negative effect is identified in relation to another criterion within the same SA Objective, the overall impact has been assigned as negative for that objective. It is therefore essential to appreciate that the recorded impacts are indicative, and that the accompanying assessment text provides a fuller explanation of the sustainability performance of the option or proposal being considered.

4.5.4 The assessment considers, on a strategic basis, the degree to which a location can accommodate change without adverse effects on valued or important receptors (identified in the baseline).

²⁶ The European Commission describes the precautionary principle as follows: "If a preliminary scientific evaluation shows that there are reasonable grounds for concern that a particular activity might lead to damaging effects on the environment, or on human, animal or plant health, which would be inconsistent with protection normally afforded to these within the European Community, the Precautionary Principle is triggered".

- 4.5.5 The level of effect has been categorised as negligible, minor or major. The nature of the significant effect can be either positive or negative depending on the type of development and the design and mitigation measures proposed. Likely impacts are not intended to be summed.

Methodology for assessment of options and policies

- 4.5.6 The appraisal of the housing options, employment options, spatial options and policies aims to assess their likely significant effects, based on the criteria set out in the SEA Regulations (see **Box 4.1**).
- 4.5.7 **Table 4.5** sets out a guide to how likely impacts have been determined in the assessment of options and policies within each SA Report.

Table 4.5: Presenting likely impacts

Likely Impact	Description	Impact Symbol
Major Positive Impact	The proposed option/policy contributes to the achievement of the SA Objective to a significant extent.	++
Minor Positive Impact	The proposed option/policy contributes to the achievement of the SA Objective to some extent.	+
Negligible Impact	The proposed option/policy has no effect or an insignificant effect on the achievement of the SA Objective.	0
Uncertain Impact	The proposed option/policy has an uncertain relationship with the SA Objective or insufficient information is available for an appraisal to be made.	?
Minor Negative Impact	The proposed option/policy prevents the achievement of the SA Objective to some extent.	-
Major Negative Impact	The proposed option/policy prevents the achievement of the SA Objective to a significant extent.	--

- 4.5.8 The appraisal commentary provided should be read alongside the identified impact symbols, as it is often difficult to distil the wide-ranging effects into one overall impact.
- 4.5.9 The appraisal has been prepared with reference to the local context and baseline information as set out in the SA Scoping Report, and the latest evidence base information that has been available at the time of each SA stage.

Methodology for assessment of reasonable alternative sites

- 4.5.10 A number of topic-specific methodologies and assumptions have been applied to the appraisal process for reasonable alternative sites against each of the SA Objectives, using available data (see **Appendix E**). While applying the same scoring system as presented in **Table 4.4**, to enable further transparency and to provide the reader with contextual information that is relevant to each SA Objective, the full site assessments presented in **Appendix F** and **G** have been set out per 'receptor'.

- 4.5.11 At Regulation 18, reasonable alternative sites were assessed before and after the application of mitigation available at that stage. As the Local Plan has progressed to Regulation 19, the proposed allocations have evolved through changes to site capacities, the introduction of site-specific allocation policies containing embedded mitigation and infrastructure requirements, and an expanded evidence base. The Regulation 19 Sustainability Appraisal therefore reassesses the submitted allocations as they now exist, rather than simply carrying forward the conclusions reached at the Regulation 18 stage.

4.6 Limitations of predicting effects

- 4.6.1 SA/SEA is a tool for predicting potential significant effects. Predicting effects relies on an evidence-based approach and incorporates expert judgement. It is often not possible to state with absolute certainty whether effects will occur, as many impacts are influenced by a range of factors such as the design and the success of mitigation measures.
- 4.6.2 The assessments in this report are based on the best available information, including secondary data provided to Lepus by the Council and information that is publicly available. Every attempt has been made to predict effects as accurately as possible.
- 4.6.3 SA operates at a strategic level which uses available secondary data for the relevant SA Objective. Throughout the SA process, all identified reasonable alternatives, options and proposals will be assessed in the same way using the same method. Sometimes, in the absence of more detailed information, forecasting the potential impacts can require making reasonable assumptions based on the best available data and trends. However, all options must be assessed in the same way, and any introduction of site-based detail should be made clear in the SA report as the new data could potentially introduce bias and skew the findings of the assessment process.

5 Reasonable alternatives

5.1 Context

- 5.1.1 Regulation 12 of the SEA Regulations²⁷ states that: *“Where an environmental assessment is required by any provision of Part 2 of these Regulations, the responsible authority shall prepare, or secure the preparation of, an environmental report ... [which] shall identify, describe and evaluate the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme”.*
- 5.1.2 PPG²⁸ states that: *“Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made”.*
- 5.1.3 The Council has therefore demonstrated how they have identified, described and evaluated reasonable alternatives as part of the plan making process within this SA Report (which includes the requirements of an SEA Environmental Report). The following sections of this chapter document the process of identifying and evaluating different types of reasonable alternative, when and where the Council considered reasonable alternatives, and how the SA influenced the preparation of the West Oxfordshire Local Plan.

5.2 Different types of reasonable alternative

- 5.2.1 It is possible to derive reasonable alternatives for different aspects of a local plan. There is no prescribed formula or procedure about which aspects of a local plan require reasonable alternatives.
- 5.2.2 All reasonable alternatives have been identified by West Oxfordshire District Council (WODC) as the Plan makers. Reasonable alternatives have been identified through consultation and close working with stakeholders, including consideration of comments received in response to the Regulation 18b and Regulation 18c consultations. Furthermore, the identification of reasonable alternatives has been informed by the national, regional and local policy context, the spatial portrait and key issues identified within West Oxfordshire, and responses received through consultation on the emerging Local Plan. The Statement of Community Involvement sets out how WODC ensures that relevant public bodies, neighbouring authorities, local organisations, and the wider community have opportunities to engage and provide comments at different stages of the plan-making process.
- 5.2.3 In addition to a suite of draft policies assessed at Regulation 18 and revised at Regulation 19, a range of reasonable alternatives (see **Figure 5.1**) have been considered throughout the plan making process, for the following different attributes of the Local Plan:
- **Housing options** – three high-level housing growth options to explore the potential number of new homes to deliver through the Local Plan (Preferred Policy Options SA, June 2025) with two further housing growth

²⁷ The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Available at: <https://www.legislation.gov.uk/uksi/2004/1633/contents/made> [Date accessed: 25/03/26]

²⁸ MHCLG (2020) Planning Practice Guidance: Strategic environmental assessment and sustainability appraisal. Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Date accessed: 25/03/26]

options introduced and assessed at the Regulation 19 stage in response to updated evidence in **Appendix D**.

- **Employment options** – four high-level employment growth options to explore the potential amount of new employment floorspace to deliver through the Local Plan (Preferred Policy Options SA – June 2025), with one further employment option introduced and assessed at the Regulation 19 stage in **Appendix D**.
- **Spatial options** – eight spatial strategy options to consider different approaches for the broad distribution of future housing and employment growth (seven in the Preferred Policy Options SA – June 2025, one in the Preferred Spatial Options SA – October 2025);
- **Strategic sites** – 29 reasonable alternative strategic development sites, capable of accommodating 300+ new homes and supporting infrastructure on site (Preferred Spatial Options SA – October 2025 and updated at the Regulation 19 stage in **Appendix F**); and
- **Non-strategic sites** – 54 reasonable alternative non-strategic development sites (Preferred Spatial Options SA – October 2025 and updated at the Regulation 19 stage in **Appendix G**).

Quick guide to reasonable alternatives

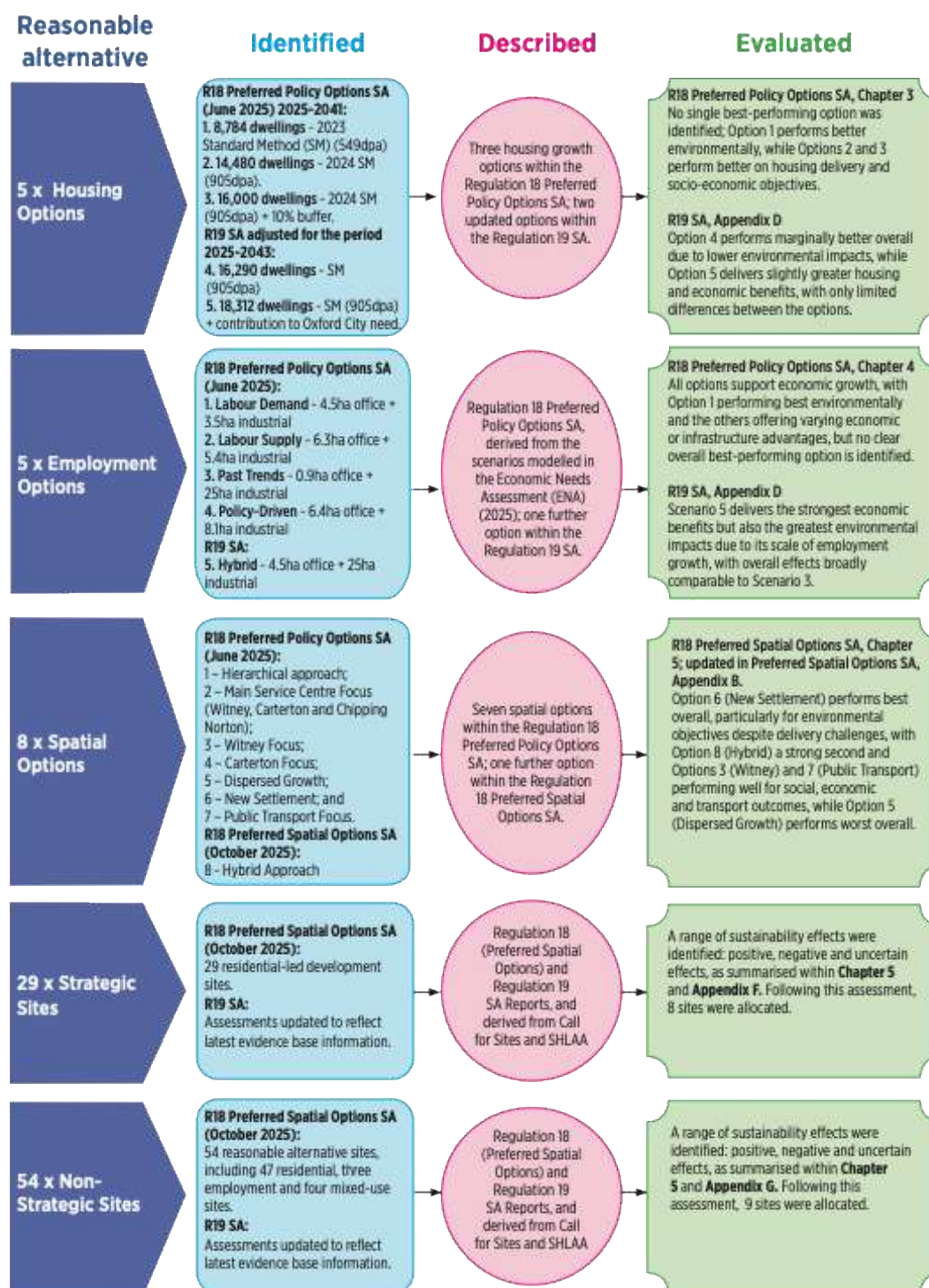


Figure 5.1: The identification, description and evaluation of reasonable alternatives considered throughout the West Oxfordshire Local Plan SA process

5.3 Housing options

- 5.3.1 Paragraph 62 of the NPPF (2024)²⁹ states that the minimum number of homes needed in an area should be informed by a local housing need assessment, conducted using the standard method outlined in PPG³⁰.
- 5.3.2 WODC has therefore identified 'housing options', which are high-level options for the scale of housing growth to be delivered through the new Local Plan. Three housing growth options were identified during the Regulation 18 Preferred Policy Options consultation stage. These have subsequently been updated as part of the current Regulation 19 stage of plan-making to account for the adjusted Plan period end date, and potential to contribute to unmet needs of neighbouring authorities. Identification of options has drawn on the housing land supply and available evidence base information.

Housing options at Regulation 18 (June 2025)

- 5.3.3 The West Oxfordshire Local Housing Needs Assessment (LHNA)³¹ was prepared using the Government's standard method and, at the time of preparing the Regulation 18 SA, identified a need for 905 dwellings per annum (dpa) in the period 2025 – 2041, equating to a total of 14,480 homes.
- 5.3.4 Three housing options were identified by WODC and assessed within the Regulation 18 Preferred Policy Options SA³² as described below and summarised in **Table 5.1**.
- 5.3.5 The first option is based on the previous 2023 standard method figure for West Oxfordshire of 549 dpa, which applied over the period 2025 – 2041 would equate to a total of 8,784 homes. Whilst WODC recognises that this is based on a methodology which has now been superseded, it was identified as a reasonable alternative for the purposes of consideration through this SA report so that the potential sustainability effects of the new standard method introduced via the NPPF in December 2024 and applying to plan-making with effect from April 2025, can be better understood.
- 5.3.6 The second option is based on West Oxfordshire's latest LHNA which identifies a housing need of 905 dwellings per annum in the 16-year period 2025 – 2041, or 14,480 in total.
- 5.3.7 The third option relates to housing supply rather than need and assumes that WODC purposefully plans for around 10% above the level of housing need identified under Option 2, which equates to around 16,000 new homes in the period 2025 – 2041. The purpose of identifying a 10% buffer is to allow for the potential non-delivery of some sites and ensure that the minimum level of housing need is fully met.

²⁹ MHCLG (2024) National Planning Policy Framework. December 2024. Available at: <https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf> [Date accessed: 30/03/26]

³⁰ MHCLG (2024) Planning Practice Guidance. Available at: www.gov.uk/guidance/housing-supply-and-delivery [Date accessed: 30/03/26]

³¹ ORS (2025) West Oxfordshire District Council Local Housing Needs Assessment (LHNA) 2025. Draft, May 2025.

³² Lepus Consulting (2025) Sustainability Appraisal of the West Oxfordshire Local Plan 2041: Regulation 18 Preferred Policy Options. June 2025. Available at: <https://www.westoxon.gov.uk/media/qi1puvnm/sustainability-appraisal-of-the-west-oxfordshire-local-plan-preferred-options-june-2025.pdf> [Date accessed: 25/03/26]

Table 5.1: Housing options identified by WODC at the Regulation 18 stage

Option	Description
Housing Option 1	8,784 dwellings based on 549 dpa using the 2023 standard method figure and applied to the period 2025 - 2041.
Housing Option 2	14,480 dwellings based on 905 dpa using the new (December 2024) standard method figure and applied to the period 2025 - 2041.
Housing Option 3	16,000 dwellings based on 905 dpa using the new (December 2024) standard method figure with a 10% buffer to account for potential non-implementation of some sites. Also applied to the period 2025 – 2041.

Housing options at Regulation 19 (this report)

- 5.3.8 Since the identification of Options 1-3 at the Regulation 18 Preferred Policy Options stage, WODC has identified an additional reasonable alternative housing number option. This reflects the potential need to accommodate a proportion of Oxford City Council's unmet housing need. In addition, the previously assessed Option 2 (based on the 2024 Standard Method calculation of 905 dpa) has been updated to reflect the extended Plan period of 2025-2043, resulting in a slight increase in the total number of homes.
- 5.3.9 Consequently, the new Option 5 identified by WODC is set out in **Table 5.2**, to be evaluated alongside the latest calculated housing need for the Plan area using the Standard Method (Option 4; effectively an updated version of the previously assessed Option 2 shown in **Table 5.1**). These options have been evaluated in **Appendix D**.
- 5.3.10 Earlier options (Options 1-3) are no longer considered reasonable alternatives, as they do not meet the identified housing requirement based on the Standard Method.

Table 5.2: Housing options identified by WODC at the Regulation 19 stage (see Appendix D)

Option	Description
Housing Option 4	16,290 dwellings based on 905 dpa using the December 2024 standard method figure and applied to the period 2025 - 2043.
Housing Option 5	16,290 dwellings based on 905 dpa using the December 2024 standard method figure, with a buffer to account for an assumed 2,022 additional new homes to assist Oxford City Council meet a proportion (18%) of its identified unmet housing need.

- 5.3.11 To understand sustainability effects against the environmental baseline, assessments require details of the size, nature and location of proposals. Housing options provide only 'nature' (i.e. housing). Without size and location, and given the focus on quantum alone, only a high-level evaluation is possible.
- 5.3.12 Options 4 and 5 perform broadly similarly across the majority of SA objectives, reflecting their comparable scale of growth. Both options would give rise to a range of environmental effects, including likely adverse impacts in relation to SA Objectives 1 (Climate Change Mitigation), 3 (Biodiversity and Geodiversity), 4 (Landscape), 6 (Air Quality), 7 (Water), and 8 (Natural Resources). Option 4 performs marginally more favourably in these areas due to its slightly lower housing requirement and associated reduced environmental pressure.

- 5.3.13 Option 5, which includes additional provision to contribute towards Oxford City's unmet housing need, is expected to result in effects of slightly greater magnitude, both positive and negative. It performs slightly more favourably in relation to SA Objectives 9 (Housing and Equality) and 13 (Economy and Employment), reflecting the benefits of increased housing delivery in meeting needs and supporting economic growth. However, these benefits are not considered sufficient to materially alter overall conclusions.
- 5.3.14 For several objectives, including SA Objectives 10 (Health and Wellbeing), 11 (Transport and Accessibility), and 12 (Education), effects remain uncertain for both options, as outcomes will depend on the location, distribution and design of development, as well as the timely provision of infrastructure.
- 5.3.15 Overall, Option 4 performs marginally better in sustainability terms due to reduced environmental effects, while Option 5 offers greater benefits in terms of housing delivery and economic growth. The differences between the options are limited, and both are capable of delivering sustainable development subject to appropriate spatial strategy choices, infrastructure provision and mitigation measures.
- 5.3.16 No overall best option can be identified based on quantum alone. All options require careful planning, infrastructure integration, efficient land use and alignment with the evidence base to achieve sustainable development.

Box 5.1: WODC selection and rejection of housing options

Option 1 has been tested for completeness and reflects the fact that when the preparation of the new West Oxfordshire Local Plan 2041 began, the standard method level of housing need for the district was around 549 dwellings per annum.

However, the 2024 NPPF introduced a standard method which applies to plan making from 12 March 2025 and has served to increase West Oxfordshire's housing need to around 905 dwellings per annum – according to the most recent LHNA. The NPPF is clear that the standard method determines the minimum number of homes needed and as such, Option 1 is not considered an appropriate approach to take forward through the new West Oxfordshire Local Plan 2041 because it has, in essence, been superseded.

Option 2 reflects the NPPF and the most recent assessment of housing need for West Oxfordshire. There is however a risk in setting a local plan housing requirement that aligns precisely with the identified level of need, insofar as there is always a possibility that some sites will not come forward as quickly as expected, or even at all. This is the case for a number of the sites that were allocated in the adopted West Oxfordshire Local Plan 2031.

In providing for a c.10% 'buffer', Option 3 provides a degree of flexibility to account for this possibility and would help to ensure that the minimum level of housing need is met, even if some sites do not come forward as expected. It also provides a degree of flexibility in respect of Oxford City's unmet housing need – an issue which West Oxfordshire has previously agreed to address but that at the present time, is hard to quantify in the period up to 2041.

Option 5 makes provision to address unmet housing needs arising from Oxford City as agreed between the Oxfordshire Planning authorities through a process of ongoing constructive cooperation. Option 5 represents the preferred option for the Local Plan as it ensures that housing needs are met in full and makes adequate provision for unmet housing needs arising from a neighbouring authority.

5.4 Employment options

Employment options at Regulation 18 (June 2025)

- 5.4.1 The NPPF³³ and accompanying PPG³⁴ require LPAs to set out an overall strategy for the provision of employment development to meet needs, based upon robust evidence. Paragraph 85 of the NPPF makes clear that “*significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development*”.
- 5.4.2 WODC commissioned an Economic Needs Assessment (ENA) to provide a detailed evidence base in order to allow for an appropriate supply and mix of employment land and premises to be planned for, and a strategy for balancing supply and demand.
- 5.4.3 WODC identified four ‘employment options’ during the Regulation 18 Preferred Policy Options consultation stage, which are high-level options for the scale of employment growth to be delivered through the new Local Plan (see **Table 5.3**). Identification of options drew on the findings of the ENA (2025)³⁵, which identified a net requirement for between approximately 9,084m² and 40,965m² office floorspace (use class E(g)(i) offices; and E(g)(ii) research and development) in West Oxfordshire up to 2041. This would translate to a land requirement for office uses of between 0.9ha and 6.4ha. Additionally, the analysis predicts a net requirement for between 24,086m² and 107,588m² of industrial floorspace (use class E(g)(iii) light industrial; B2 general industrial; and B8 storage and distribution). This would translate to a land requirement for industrial uses of between 3.5ha and 25.0ha.

Table 5.3: Employment options identified by WODC at the Regulation 18 stage

Option	Office space	Industrial space	Total
Scenario 1 – Labour Demand Based on the floorspace and land needed to accommodate expected employment growth in West Oxfordshire, as per the latest employment forecasts derived from Oxford Economics data.	4.5 ha	3.5 ha	8 ha
Scenario 2 – Labour Supply Based on the latest population and housing growth projections, as derived from Office for National Statistics data and the 2025 ORS Local Housing Needs Assessment.	6.3 ha	5.4 ha	11.7 ha
Scenario 3 – Past Trends Trend-based scenario based on the continuation of historical take-up rates, sourced from CoStar. This analyses take-up rates by use class over the last 15 years and extrapolates these trends over the assessment period.	0.9 ha	25 ha	25.9 ha
Scenario 4 – Policy Driven Based on employment levels that could be possible with an ambitious economic development strategy reflecting priority sectors as set out for Oxfordshire and/or the district in available plans and strategies.	6.4 ha	8.1 ha	14.5 ha

³³ MHCLG (2024) National Planning Policy Framework. December 2024. Available at: <https://assets.publishing.service.gov.uk/media/675abd214cbda57cacd3476e/NPPF-December-2024.pdf> [Date accessed: 30/03/26]

³⁴ MHCLG (2025) Guidance: Housing and economic needs assessment. Available at: <https://www.gov.uk/guidance/housing-and-economic-development-needs-assessments#economic-need> [Date accessed: 30/03/26]

³⁵ AECOM (2025) Economic Needs Assessment: West Oxfordshire District Council. June 2025. Available at: <https://www.westoxon.gov.uk/media/0f5joivu/west-oxfordshire-economic-needs-assessment-june-2025.pdf> [Date accessed: 18/06/26]

Employment options at Regulation 19 (this report)

- 5.4.4 Since the identification of Scenarios 1-4 at the Regulation 18 Preferred Policy Options stage, WODC has identified a further reasonable alternative employment number option. This reflects a hybrid of Scenario 1 (Labour Demand) for office uses and Scenario 3 (Past Trends) for industrial uses. This hybrid scenario forecasts growth of 30,008m² of office space (E(g)(i) and E(g)(ii) uses) and 107,588m² of industrial space (E(g)(iii), B2 and B8 uses). This equates to a land requirement of approximately 25ha for industrial space and 4.5ha for office space.
- 5.4.5 Accordingly, WODC has defined a new Scenario 5 (**Table 5.4**) to be evaluated alongside the original four scenarios (**Table 5.3**).

Table 5.4: Employment option identified by WODC at the Regulation 19 stage (see Appendix D)

Option	Office space	Industrial space	Total
Scenario 5 – Hybrid A hybrid of Scenario 1 (Labour Demand) for office uses and Scenario 3 (Past Take Up) for industrial uses.	4.5 ha	25 ha	29.5 ha

- 5.4.6 To assess sustainability effects against the environmental baseline, details of the size, nature, and location of proposals are needed. Employment options only specify the 'nature' (employment land) so, without size and location information, and given the focus on quantification, only a high-level evaluation is possible.
- 5.4.7 All employment scenarios would increase employment floorspace and support economic growth. Lower growth scenarios (particularly Scenario 1) are likely to perform more favourably against environmentally focused objectives, including SA Objectives 1 (Climate Change Mitigation), 3 (Biodiversity and Geodiversity), 4 (Landscape), 6 (Air Quality), 7 (Water), and 8 (Natural Resources), due to reduced land take and associated pressures, although some adverse effects are expected across all scenarios.
- 5.4.8 Scenario 5 represents a higher growth option, with increased provision for industrial and logistics uses. It is expected to generate strong positive effects for SA Objective 13 (Economy and Employment), with secondary benefits for SA Objectives 9 (Housing and Equality) and 12 (Education). However, it would also give rise to greater environmental effects than the other scenarios, reflecting its scale.
- 5.4.9 Effects for SA Objectives 2 (Climate Change Adaptation), 5 (Cultural Heritage), 10 (Health and Wellbeing), and 11 (Transport and Accessibility) remain uncertain or neutral across all scenarios, as they depend on the location and design of development.
- 5.4.10 Overall, Scenario 5 offers the greatest economic benefits but with potentially increased environmental challenges. Its overall sustainability performance is broadly comparable to Scenario 3, and no single best-performing option is identified. All scenarios could support sustainable development subject to appropriate spatial strategy, infrastructure provision and mitigation.

Box 5.2: WODC selection and rejection of employment options

The five options which have been identified as reasonable alternatives for the quantum of employment land to be provided through the new Local Plan are rooted in an updated Economic Needs Assessment (ENA) prepared for the District Council by independent consultants.

In line with established guidance and best practice, the five options comprise a number of different scenarios based on different variables including forecast employment growth (labour demand) forecast population and housing growth (labour supply) historical take-up rates (past trends) as well as a policy driven scenario, reflecting the potential offered by high priority growth sectors.

The ENA itself identifies a 'preferred' scenario which is effectively a hybrid of scenario/option 1 (labour demand) for office uses (4.5 hectares) and scenario/option 3 (past-trends) for industrial uses (25 hectares).

To cater for this, in its preferred policy option (Core Policy 5 – Supporting Economic Growth and Local Prosperity) the Council has purposefully aligned its indicative land requirement with the recommendations of the Economic Needs Assessment.

The figures are stated as being indicative and providing flexibility for economic development, without being considered an absolute requirement or maximum cap. They reflect the evolving nature of economic demand and the need for flexibility in planning.

Scenario 5 has been selected as the Council's preferred option.

5.5 Spatial options

Spatial options at Regulation 18 (June 2025)

- 5.5.1 At the Regulation 18 Preferred Policy Options stage, the SA³⁶ included an evaluation of seven spatial options identified by WODC, which set out differing approaches to the broad spatial distribution for housing and employment growth in West Oxfordshire for the Plan period (see **Table 5.5**).
- 5.5.2 At the time of assessment, each of the seven options was expected to include the delivery of c.6,500 new homes alongside proportionate employment growth. The total of 6,500 homes was the 'residual' number of new homes WODC identified in its Preferred Policy Options paper as being needed to meet the overall planned supply of 16,000 homes once existing planning permissions, adopted local plan allocations and a reasonable windfall allowance have been taken into account.

Table 5.5: Spatial options identified by WODC at the Regulation 18 Preferred Policy Options stage

Option	Description
Option 1 – Hierarchical Approach	2 x strategic allocations would be made at Carterton and Witney (1,500 each settlement) 1x strategic allocation at Chipping Norton which is partially in the National Landscape (750 dwellings) 1x non-strategic allocation at each of the rural service centres (250 x 7) - Balance of 1,000 homes at each of the larger villages (1,050 total)
Option 2 – Main Service Centre Focus (Witney, Carterton and Chipping Norton)	2 x strategic allocations at Witney and Carterton (4,000 dwellings total, 2,000 each) 2 x strategic allocations at Chipping Norton (1,500 dwellings total, 750 each) - Balance of 1,000 homes at each of the Rural Service centres (1,226 total)

³⁶ Lepus Consulting (2025) Sustainability Appraisal of the West Oxfordshire Local Plan. Regulation 18: Preferred Policy Options SA Report. June 2025. Available at: <https://www.westoxon.gov.uk/media/qi1puvnm/sustainability-appraisal-of-the-west-oxfordshire-local-plan-preferred-options-june-2025.pdf> [Date accessed: 30/03/26]

Option	Description
Option 3 – Witney Focus	The total residual housing requirement (6,500) would be met at Witney, maximising development of all promoted development sites around the town.
Option 4 – Carterton Focus	The total residual housing requirement (6,500) would be met at Carterton, maximising development of all promoted development sites around the town (in neighbouring parishes of Brize Norton, Shilton and Alvescot)
Option 5 – Dispersed Growth	15% growth would be attributed to major service centres (c.3,700 dwellings) 10% to rural service centres (c.1,000) and larger villages in West Oxfordshire (c.1,800)
Option 6 – New Settlement	- A single new settlement of 6,500 homes somewhere in the district - Two new settlements of c.3,250 homes each somewhere in the district
Option 7 – Public Transport Focus	5,000 homes along the A40 corridor including 2,000 at Carterton 2,000 at Witney and 1,000 'elsewhere' along the A40 corridor 1,500 homes along the Cotswold and Cherwell Valley rail lines focused at rural service centres and larger villages.

5.5.3 The Regulation 18 SA (June 2025) highlighted strengths and weaknesses of each approach against the achievement of the SA Objectives. Overall, the SA reported that Option 6 (New Settlement) emerged as the most frequent best performing option across six of the SA Objectives, including climate change adaptation, biodiversity and geodiversity, landscape, cultural heritage, air quality and water (SA Objectives 2-7), given the opportunity to incorporate an effective layout and design from the earliest stages of development. Option 3 (Witney Focus) was identified as the best performing option across four of the SA Objectives, including housing and equality, health and wellbeing, education and economy and employment (SA Objectives 9, 10, 12 and 13). Option 7 (Public Transport Focus) was identified as the best performing option across climate change mitigation and transport and accessibility (SA Objectives 1 and 11), with Option 4 (Carterton Focus) identified as the best performing option with regard to natural resources and waste.

5.5.4 On the other hand, Option 5 (Dispersed Growth) was identified as the worst performing option across 11 of the SA Objectives due to its potential to lead adverse impacts across the widest area. Option 3 (Witney Focus) was identified as the worst performing option with regards to air quality (SA Objective 6), with Options 3 (Witney Focus) and 4 (Carterton Focus) jointly identified as the worst performing options with regards to water (SA Objective 7).

Spatial options at Regulation 18 (October 2025)

5.5.5 Drawing on the findings of the SA assessments, as well as comments received in response to the Preferred Policy Options consultation in summer 2025, WODC considered that a 'hybrid' approach may offer more sustainable outcomes than any one of the previous options alone. As such, WODC has identified an eighth reasonable alternative spatial option for consideration at the Preferred Spatial Options consultation stage that takes on board the aspects of the other seven options that were most supported.

- 5.5.6 The assessment of spatial options was therefore updated in the Regulation 18 Preferred Spatial Options SA³⁷, incorporating the new Option 8 'Hybrid Approach' and evaluating this alongside the previous seven options (see **Table 5.6**).
- 5.5.7 Taking into account past completions, commitments, adopted local plan allocations and windfall allowance, WODC identified the residual housing requirement to be identified in the new Local Plan is approximately 8,000 homes. This has increased since the Preferred Policy Options consultation stage, where 6,500 homes was the residual need, as a result of extending the Plan period by an additional two years to ensure that it covers a minimum of 15 years post-adoption.

Table 5.6: Spatial options identified by WODC at the Regulation 18 Preferred Spatial Options stage

Option	Description
Option 1 – Hierarchical Approach	2 x strategic allocations would be made at Carterton and Witney (1,800 each settlement) 1x strategic allocation at Chipping Norton which is partially in the AONB (900 dwellings) 1x non-strategic allocation at each of the rural service centres (300 x 7) - Balance of 1,400 homes at each of the larger villages
Option 2 – Main Service Centre Focus (Witney, Carterton and Chipping Norton)	2 x strategic allocations at Witney and Carterton (5,000 dwellings total, 2,500 each) 2 x strategic allocations at Chipping Norton (1,800 dwellings total, 900 each) - Balance of 1,200 homes at each of the rural service centres
Option 3 – Witney Focus	The total residual housing requirement (8,000) would be met at Witney, maximising development of all promoted development sites around the town
Option 4 – Carterton Focus	The total residual housing requirement (8,000) would be met at Carterton, maximising development of all promoted development sites around the town (in neighbouring parishes of Brize Norton, Shilton and Alvescot)
Option 5 – Dispersed Growth	15% growth would be attributed to major service centres (c.4,800 dwellings) 10% (c.3,200) to rural service centres (c.1,100) and larger villages in West Oxfordshire (c.2,100)
Option 6 – New Settlement	- A single new settlement of 8,000 homes somewhere in the district, or - Two new settlements of c.4,000 homes each somewhere in the district
Option 7 – Public Transport Focus	6,200 homes along the A40 corridor including 2,500 at Carterton 2,500 at Witney and 1,200 'elsewhere' along the A40 corridor 1,800 homes along the Cotswold and Cherwell Valley rail lines focused at rural service centres and larger villages
Option 8 – Hybrid Approach	86% to main service centres (c.4,130 dwellings to Carterton as new settlement(s); c.2,200 to Witney; and c.550 to Chipping Norton) 8% to service centres (c.640) 6% to larger villages and those with rail connections (c.480)

- 5.5.8 **Table 5.7** presents the high-level summary assessment scores for the eight spatial options, as detailed within the narrative assessment.

³⁷ Lepus Consulting (2025) Sustainability Appraisal of the West Oxfordshire Local Plan 2043: Regulation 18 Preferred Spatial Options. October 2025. Available at: <https://www.westoxon.gov.uk/media/bjib5i14/local-plan-sustainability-appraisal-preferred-spatial-options-october-2025.pdf> [Date accessed: 25/03/26]

- 5.5.9 All of the eight spatial options evaluated have benefits and limitations associated with their approach, some of which are not known with certainty at this high level of assessment. All of the options will support the provision of housing and employment growth in West Oxfordshire to meet the identified needs for the Plan period up to 2043.
- 5.5.10 Overall, Option 6 (New Settlement) emerged as the most frequent best performing option across the SA Objectives, although it should be acknowledged that this strategy would face significant challenges in terms of securing the necessary infrastructure, overcoming planning and land acquisition constraints, and delivering growth within the Plan period. Similarly well-performing options include Option 3 (Witney Focus) (although Option 3 has also been identified as worst performing for two SA Objectives), Option 7 (Public Transport Focus), and Option 8 (Hybrid Approach) that notably performs second-best or amongst the top performing options across the SA Framework. Whereas, Option 5 (Dispersed Growth) has been identified to perform the worst across the widest range of SA Objectives.

Table 5.7: Overall impact matrix table of the eight spatial options

Spatial strategy option	1 Climate change mitigation	2 Climate change adaptation	3 Biodiversity and geodiversity	4 Landscape	5 Cultural heritage	6 Air quality	7 Water	8 Natural resources and waste	9 Housing and equality	10 Health and wellbeing	11 Transport and accessibility	12 Education	13 Economy and employment
1 – Hierarchical Approach	0	-	-	-	-	-	-	--	++	++	0	+	++
2 – Main Service Centre Focus	+	-	-	-	-	-	-	-	++	++	+	+	++
3 – Witney Focus	+	-	-	-	-	--	-	-	++	++	+	+	++
4 – Carterton Focus	+	-	-	-	-	-	-	-	++	++	+	+	++
5 – Dispersed Growth	--	-	-	-	-	-	-	--	++	-	-	0	+
6 – New Settlement	++	0	-	0	0	0	-	-	++	++	++	+	++
7 – Public Transport Focus	++	-	-	-	-	-	-	--	++	++	++	+	++
8 – Hybrid Approach	+	-	-	-	-	-	-	-	++	++	++	+	++

Box 5.3: WODC selection and rejection of spatial options

- **Hierarchical Approach** – The Preferred Spatial Option includes a hierarchical approach to guiding development to the most sustainable settlements, primarily the Main Service Centres. Rather than focussing solely on urban extensions to existing settlements, the preferred spatial strategy includes proposals for standalone communities, designed to have a sufficient critical mass to support a range of services and facilities to meet day-to-day needs, while also being well connected to the nearest larger settlement for access to higher-order services and facilities.
- **Main service centre focus** – The preferred spatial option focuses to a significant extent on the Main service centres, but with distribution of strategic and non-strategic sale development to other service centres and larger villages.
- **Witney Focus** – The preferred spatial option identifies Witney as an area of focus, but distributes strategic scale development to the other principal settlements as well.
- **Carterton focus** – The preferred spatial option identifies Carterton as an area of focus, but distributes strategic scale development to the other principal settlements as well.
- **Dispersed Growth** – This spatial option is rejected as would result in an unsustainable pattern of development in the district with significant environmental impacts. It is the worst scoring of all spatial options.
- **New Settlement** – The preferred spatial option includes proposals for standalone communities, designed to have a sufficient critical mass to support a range of services and facilities to meet day-to-day needs, while also being well connected to the nearest larger settlement for access to higher-order services and facilities.
- **Public Transport focus** – The preferred spatial option focusses development at the most accessible locations for public transport.
- **Hybrid Approach** – This is the preferred spatial option and incorporates elements of individual options 1, 2, 3, 4, 6, and 7.

5.6 Reasonable alternative development sites

Reasonable alternative sites at Regulation 18 (October 2025)

- 5.6.1 A number of potential sites for development have been considered by WODC during the preparation of the Local Plan, including those submitted in response to the ‘call for sites’ during the ‘focused consultation on ideas and objectives’ between August and October 2023. These potential sites were then subject to a filtering process conducted by WODC, considering the following matters:
- Sites submitted to the Council for consideration through the Housing and Economic Land Availability Assessment (HELAA);
 - Previous HELAA assessments as to whether sites were considered suitable for development;
 - Whether a site had a close spatial relationship with a service centre or village;
 - Proximity of sites to railway station; and
 - Whether officers considered sites to be suitable for development.
- 5.6.2 Sites were ruled out where they were deemed inappropriate for development, for example, isolated sites in the open countryside, sites located in the Cotswolds National Landscape (CNL) in areas deemed unsustainable (e.g., in settlements without railway stations), and sites with a history of planning refusals or where permission had been dismissed at appeal.
- 5.6.3 As a result of this filtering process, WODC has identified a total of 29 reasonable alternative strategic sites, and 54 reasonable alternative non-strategic sites.

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- 5.6.4 Strategic sites are considered by WODC to comprise sites promoted for residential-led uses, with an indicative capacity of 300 or more homes and have more capability to deliver supporting infrastructure alongside residential growth. Non-strategic sites include all other smaller reasonable alternative sites promoted for residential or employment uses.
- 5.6.5 All reasonable alternative sites have been assessed before and after mitigation. The main purpose of this exercise is to avoid any risk of ‘green wash’: a process whereby immediate application of policy prescription can give the impression that no adverse effects will arise, without knowing the extent of adverse effect that existed in the first place. This process helps achieve transparency in the appraisal process and follows established best practice (RTPI Guidance 2018³⁸) of presenting assessment results before and after mitigation has been applied. Evaluating policies in the SA enables scrutiny of how effective the policies are as mitigation tools.
- 5.6.6 Of the strategic sites assessed at Regulation 18, Sites SHIL003 and WOOD001 emerged as the overall best performing sites, performing well across multiple sustainability objectives in the high-level assessment. In contrast, Site BG001 is identified as the overall worst performing site, showing poor performance across several objectives.
- 5.6.7 Of the non-strategic sites assessed at Regulation 18, the assessment identified Sites CA1, CART001, WIT005, and WIT3 as the overall best performing non-strategic sites, performing well across multiple sustainability objectives. In contrast, Sites ENS001, MB001 and MB004 are the overall worst performing, each showing poor performance across two SA Objectives, though they perform well in some areas.
- 5.6.8 The SA process has been used to evaluate reasonable alternative sites on a comparable basis against the SA Framework to identify likely sustainability impacts. It is WODC’s role to use the SA findings, alongside other evidence base material, to decide which sites to ‘select’ for allocation in the Local Plan and which to ‘reject’ from further consideration. **Appendix I** sets out the outline reasons for selection and rejection of each reasonable alternative site considered throughout the SA process, provided by WODC.

³⁸ RTPI (2018) Strategic Environmental Assessment: Improving the effectiveness and efficiency of SEA/SA for land use plans. Available at: <https://www.rtpi.org.uk/media/wwbpxmrt/sea-sapracticeadvicefull2018c.pdf> [Date accessed: 25/03/26]

6 The preferred approach

6.1 Introduction

- 6.1.1 The preferred policies and site allocations presented in the Regulation 19 Local Plan have evolved through an iterative process, informed by the assessment of reasonable alternatives and the findings of the Sustainability Appraisal. Where appropriate, mitigation measures identified through this process have been embedded within the wording of the preferred policies. This chapter presents the SA findings for the preferred policies and allocations as drafted in the Regulation 19 Local Plan. The appraisal does not undertake separate pre- and post-mitigation assessments; rather, it considers the policies as proposed, including any embedded mitigation. Where uncertainty remains regarding the effectiveness of mitigation measures, the precautionary principle³⁹ has been applied.

6.2 Local Plan policies

- 6.2.1 The WODC Local Plan is composed primarily of 68 policies, which will be anticipated to help ensure that potential adverse impacts on sustainability identified as a result of the development proposed within the WODC Local Plan are avoided, mitigated or subject to compensatory measures wherever possible. The policies will also provide development proposals with relevant supporting information to ensure that the impacts of development can be appropriately factored into land use decision-making processes.
- 6.2.2 The 68 WODC Local Plan policies have been assessed in **Appendix H**, alongside the assessment of the vision and spatial development strategy.
- 6.2.3 The WODC Local Plan policies will be expected to ensure that potential adverse impacts on sustainability identified as a result of the development proposed within the WODC Local Plan are avoided, mitigated or subject to compensatory measures wherever possible. The policies will also provide any potential development proposals with relevant supporting information to ensure that any impacts from development can be appropriately factored into decision-making processes.
- 6.2.4 For many of the WODC Local Plan policies, the assessments have resulted in negligible, minor positive or major positive impacts. Negligible effects were identified where the policy was not anticipated to cause any adverse impact on the SA Objectives, including on any of the receptors set out in the SA Framework (see **Appendix B**), which is the case for many of the more 'thematic' policies.
- 6.2.5 There has however been a greater range of sustainability effects identified for policies which have the potential to introduce new development in the Plan area. As such, potential minor negative, major negative or uncertain impacts have been identified for some SA Objectives as a result of policies in these sections, owing to the potential for the large amount of proposed development to lead to increases in pollution and waste, or introduction of new development into areas where there may be sensitive receptors.
- 6.2.6 The impact matrix for the policy assessments is presented in **Table 6.1**. These impacts should be read in conjunction with the assessment text narratives in **Appendix H**.

³⁹ The European Commission describes the precautionary principle as follows: "If a preliminary scientific evaluation shows that there are reasonable grounds for concern that a particular activity might lead to damaging effects on the environment, or on human, animal or plant health, which would be inconsistent with protection normally afforded to these within the European Community, the Precautionary Principle is triggered".

Table 6.1: Summary of policy assessments

Policy Ref	1 CC Mitigation	2 CC Adaptation	3 Biodiversity	4 Landscape	5 Cultural Heritage	6 Air Quality	7 Water	8 Natural Resources	9 Housing	10 Health	11 Transport	12 Education	13 Economy
Vision	++	++	++	++	++	+	+	0	++	++	++	+	++
Objectives	++	+	++	++	+	+	+	+	++	++	++	+	++
SP1	0	0	0	0	0	0	0	0	0	0	0	0	0
SP2	+	0	+	+	+	0	0	+	++	+	+	+	++
SP3	0	0	+	++	+	0	0	+	0	+	+	0	0
SP4	+	+	+	++	+	+	+	0	0	+	0	0	0
SP5	+	0	0	0	0	+	0	0	0	0	++	0	+
CP1	++	++	++	+	0	+	++	+	+	+	+	0	0
CP2	-	+/-	+/-	+/-	+/-	-	+/-	--	++	0	+/-	0	+
CP3	-	+/-	+/-	+/-	+/-	-	+/-	-	0	0	+	+	++
CP4	+	+	+	+	0	+	+	0	0	+	+	+	0
CP5	0	++	+	+	0	0	++	0	0	+	0	0	0
CP6	+	+	0	++	+	0	0	0	0	+	+	0	0
CP7	0	0	+	0	0	+	0	0	+	++	+	0	0
CP8	+	0	0	0	0	+	0	0	0	+	++	0	0
CP9	+	0	0	++	++	0	0	0	0	0	0	0	+
CP10	+	+	++	+	0	+	+	+	0	+	0	0	0
CA1	++	+	+	++	+	+	+	+	+	+	++	+	++
CA2	+	+	+	++	+	+	0	+	+	+	++	0	++
CA3	-	-	0	0	0	-	0	0	+	0	0	0	+
CA4	+	+	+	+	0	+	0	+	++	+	+	+	+
WIT1	++	+	+	++	++	+	+	+	++	+	++	++	++
WIT2	+	+	+	+	++	+	0	+	+	+	++	0	++
WIT3	+	+	++	+	+	+	+	0	0	+	0	0	0
WIT4	+	+	+	+	+	+	+	++	+	+	+	0	++
CN1	++	+	+	++	++	+	+	0	+	+	0	+	++
CN2	+	+	+	++	++	+	0	+	+	+	++	+	++
BA1	++	++	+	++	+	+	+	+	+	+	++	+	+
BU1	+	+	+	++	++	+	0	+	++	+	++	+	++
BU2	+	0	0	++	++	+	0	+	0	+	++	0	++
CH1	++	++	+	++	++	+	+	0	++	+	++	+	++
EYN1	++	++	+	++	++	+	+	0	+	+	++	+	++
LH1	++	++	+	+	+	+	+	+	+	+	++	+	+
LH2	+	+	+	+	0	+	+	+	0	+	++	+	+
WO1	++	++	++	++	++	+	++	+	+	++	++	++	++
WO2	+	0	0	++	++	+	0	+	+	+	++	0	++
WO3	0	0	0	+	++	0	0	0	0	0	0	0	+
RA1	++	++	0	++	++	+	0	0	++	+	++	+	++
RA6	-	0	+	+	0	-	+	+	0	0	++	++	++
DM1	++	++	+	+	+	+	+	+	0	+	0	0	0
DM2	+	+	++	+	0	+	+	+	0	+	0	0	0

Policy Ref	1 CC Mitigation	2 CC Adaptation	3 Biodiversity	4 Landscape	5 Cultural Heritage	6 Air Quality	7 Water	8 Natural Resources	9 Housing	10 Health	11 Transport	12 Education	13 Economy
DM3	+	+	+	++	+	+	+	0	0	+	0	0	0
DM4	+	0	+	+	0	0	0	0	0	0	+	0	0
DM5	+	0	+	+	0	+	0	++	0	+	+	+	+
DM6	+	+	++	+	0	+	+	+	0	+	0	0	0
DM7	+	+	+	+	0	0	0	0	0	++	0	0	0
DM8	+	+	+	0	0	0	+	+	0	++	+	0	0
DM9	++	+	0	0	0	+	0	0	0	0	0	0	0
DM10	++	+	+	0	0	+	0	+	0	0	0	0	0
DM11	++	+	0	0	+	+	0	+	0	0	0	0	0
DM12	+	0	0	0	0	0	0	+	0	0	0	0	+
DM13	++	+	+	0	0	++	+	0	0	++	+	0	0
DM14	0	0	0	+	+	0	0	0	0	+	++	0	++
DM15	0	0	0	0	0	0	0	0	0	+	0	+	+
DM16	+	+	++	+	0	+	0	0	0	+	++	0	0
DM17	+	0	0	0	0	+	0	0	0	+	++	0	0
DM18	0	0	0	0	+	0	0	+	+	0	0	0	0
DM19	0	0	0	0	0	0	0	0	++	+	0	0	0
DM20	0	0	0	0	0	0	0	0	++	0	0	0	0
DM21	0	0	0	0	0	0	0	0	++	+	0	0	0
DM22	0	0	0	+	0	0	0	+	+	0	0	0	+
DM23	0	0	0	0	0	0	0	0	+	0	0	0	0
DM24	0	0	0	0	0	0	0	0	++	+	+	+	+
DM25	0	0	0	0	0	0	0	+	+	0	0	0	0
DM26	0	0	0	+	++	0	0	+	0	0	0	0	0
DM27	0	0	0	0	0	0	0	+	0	0	+	+	++
DM28	0	0	0	+	+	0	0	+	+	0	0	+	++
DM29	0	0	0	0	0	0	0	0	0	0	0	++	++
DM30	+	+	+	+	+	+	0	+	0	0	0	0	++
DM31	+	0	0	0	0	+	0	0	0	0	0	+	++

6.3 Site allocations

6.3.1 A total of 17 sites have been allocated, contributing to the housing requirement of 18,318 homes and the employment requirement of approximately 29.5ha employment space. These sites comprise eight strategic sites, and nine non-strategic sites, as presented in **Figure 6.1**.

6.3.2 A number of changes have taken place to the sites since the Regulation 18 stage. In addition, four of the strategic sites and four of the non-strategic sites comprise new sites which have come forward since the Regulation 18 stage, derived from combinations of reasonable alternative sites at Regulation 18 (as outlined in the reasons for selection / rejection in **Appendix I**). **Tables 6.2** and **6.3** below set out the allocations for both the strategic and non-strategic sites, including any changes to site names since Regulation 18.

Table 6.2: Strategic site allocations

Site ref. at Reg. 19	Reg 18 status	Site name	Site use	Area (ha)	Capacity
CA5	Previous site reference ALV002	Land West of Carterton	Mixed use (residential and community)	125	800 dwellings
CA6	New site at Reg 19	Land North of Carterton	Residential	134	700 dwellings
CA7	Previous site reference BN003	Land North of Brize Norton and Carterton – Foxbury Farm	Mixed use (residential and employment)	255	2000 dwellings
CA8	Previous site reference BN006	Land East of Brize Norton	Mixed use (residential and community)	392	2000 dwellings
CN3	New site at Reg. 19	Land East of Chipping Norton at London Road	Residential	37	750 dwellings
WIT5	Previous site reference WIT001	Land South at Witney	Mixed use (residential, employment and community)	108	700 dwellings
WIT6	New site at Reg. 19	Land West of Witney	Residential	85	700 dwellings
WIT7	New site at Reg. 19	Land North of Burford Road	Residential	99	700 dwellings

Table 6.3: Non-strategic site allocations

Site ref. at Reg. 19	Reg 18 status	Site name	Site use	Area (ha)	Capacity
BA2	New site at Reg. 19	Land East of Bampton	Residential	29	150
BU3	New site at Reg.19	Land South of Sheep Street	Residential	3	70
CH2	Previous site reference CHAR004	Land at Jefferson's Piece	Residential	2	40
CH3	Previous site reference CHAR006	Land South of Hydac	Residential	5	40
LH3	Previous site reference HAN001, no longer a strategic site	Land at Hanborough Station	Residential	35	300
RA3	New site at Reg. 19	Land North of Aston	Residential	2	25

RA4	New site at Reg. 19	Land at Kingham Station	Residential	8	70
RA5	Previous site reference STAN001	Land at the Downs	Residential	29	200
RA6	Previous site reference TACK003	Land West of Rousham Road, Tackley	Residential	3	70

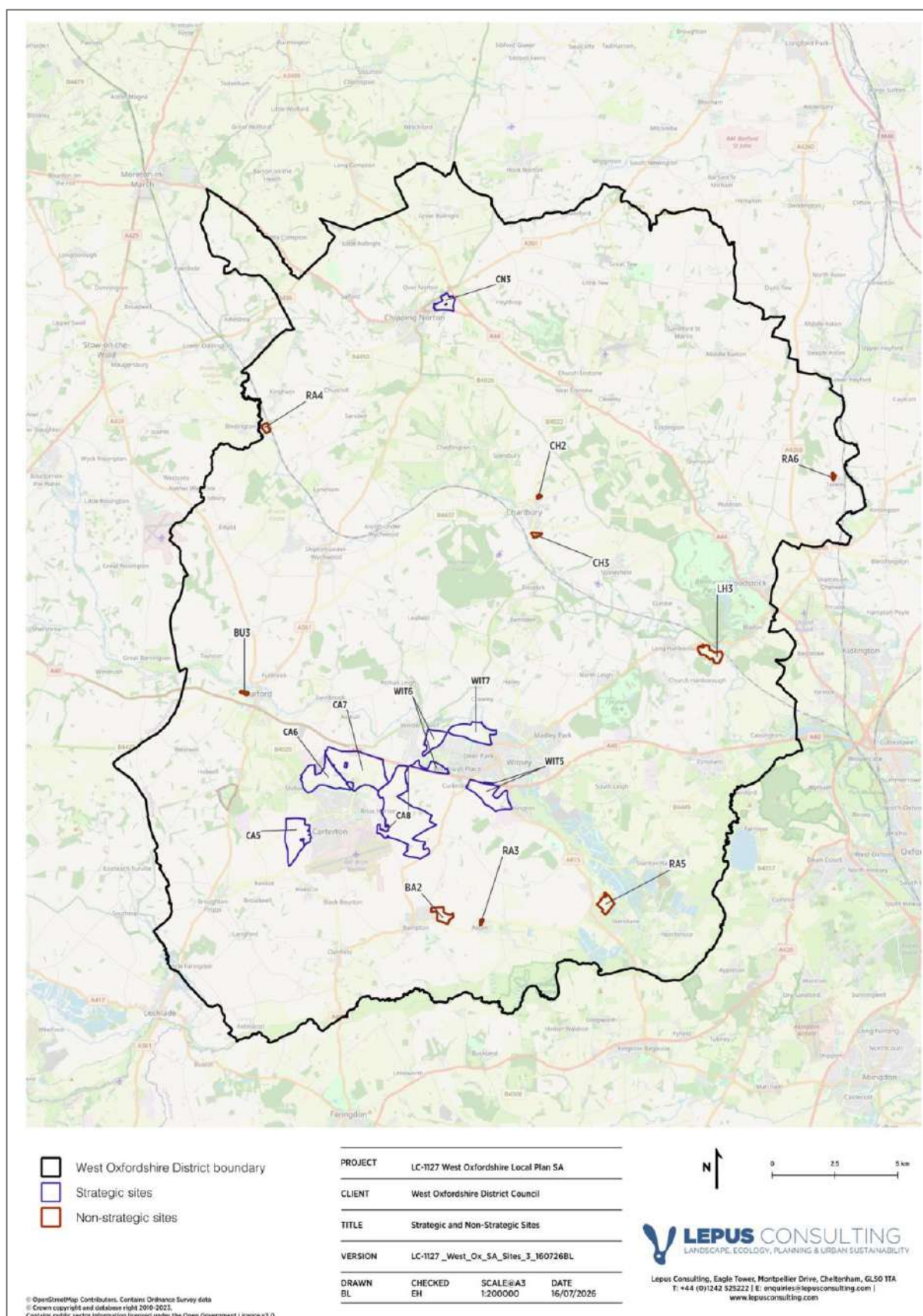


Figure 6.1: All WODC Local Plan site allocations

Strategic site assessments

- 6.3.3 The strategic site assessments identify a broadly consistent pattern of sustainability effects across the proposed allocations, as outlined in **Appendix F**. All sites make a significant positive contribution to housing delivery, with major positive effects for housing and equality through the provision of new homes, including affordable housing, and supporting infrastructure. Most allocations also generate major positive effects for the economy through construction activity, increased expenditure and, in some cases, new employment land or community facilities. Positive effects are also identified for education where additional capacity is provided.
- 6.3.4 However, most strategic allocations involve greenfield development, resulting in significant adverse effects from the loss of agricultural land, including Best and Most Versatile soils. Landscape effects are also frequently adverse, particularly where development extends into open countryside or affects sensitive landscapes such as the Cotswolds National Landscape. Biodiversity impacts are generally minor adverse but increase where sensitive habitats are present. Residual adverse effects are also identified for transport, health, air quality and cultural heritage. Although mitigation measures such as landscape-led design, sustainable drainage, biodiversity net gain and active travel reduce impacts, they do not fully address the key environmental effects of large-scale greenfield development. See **Table 6.4** for a summary of identified effects on the strategic sites.

Table 6.4: SA scoring table for strategic sites in the R19 Local Plan

Site Reference	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape	Cultural heritage	Air quality	Water	Natural resources	Housing and equality	Health and wellbeing	Transport and accessibility	Education	Economy
CA5	+/-	-	-	--	0	0	-	--	++	-	-	++	++
CA6	+/-	+	-	-	-	-	0	--	++	-	-	-	++
CA7	+/-	+	-	-	-	-	0	--	++	-	-	++	++
CA8	+/-	--	--	-	--	-	-	--	++	-	-	+	++
CN3	+/-	+	0	--	-	-	0	--	++	-	-	++	-
WIT5	+/-	--	-	-	-	-	0	--	++	-	-	++	++
WIT6	+/-	0	0	-	-	-	0	--	++	-	-	-	++
WIT7	+/-	0	-	-	-	0	0	--	++	-	-	-	++

Non-strategic site assessments

- 6.3.5 The non-strategic site assessments identify a consistent pattern of sustainability effects, as outlined in **Appendix G**. All sites provide significant benefits through housing delivery, including affordable housing, alongside positive effects for the economy and, where applicable, sustainable transport through improved access to services and employment.

6.3.6 However, most allocations involve greenfield development, resulting in adverse effects from the loss of agricultural land, including Best and Most Versatile soils, and impacts on landscape character. These effects are greater where sites are located within or near sensitive landscapes, heritage assets or ecological features. Further residual effects are identified for biodiversity, water, health, education and cultural heritage due to infrastructure pressures and environmental sensitivities. While mitigation measures such as landscape-led design, sustainable drainage, green infrastructure and active travel reduce impacts, they do not fully offset the effects of development on undeveloped land. Overall, the sites provide strong housing and economic benefits but require careful mitigation of environmental constraints. See **Table 6.5** for a summary of identified effects on the strategic sites.

Table 6.5: SA scoring table for non-strategic sites in the R19 Local Plan

Non-strategic site reference	Climate change mitigation	Climate change adaptation	Biodiversity and geodiversity	Landscape	Cultural heritage	Air quality	Water	Natural resources and waste	Housing and equality	Health and wellbeing	Transport and accessibility	Education	Economy and employment
BA2	+/-	0	+/-	0	-	0	-	-	++	-	-	-	++
BU3	+/-	+	-	--	-	0	+/-	-	++	-	-	++	++
CH2	+/-	+	-	-	-	0	0	-	++	-	++	-	++
CH3	+/-	+	-	-	-	0	0	-	++	-	++	-	++
LH3	+/-	+	-	-	-	-	-	--	++	-	++	-	++
RA3	+/-	+	+/-	0	-	0	+/-	-	++	-	-	-	++
RA4	+/-	0	+/-	--	-	0	-	-	++	-	++	-	++
RA5	+/-	+	+/-	-	-	0	+/-	--	++	-	0	-	++
RA6	+/-	+	+/-	-	-	0	-	-	++	-	++	-	++

6.4 Whole plan appraisal

6.4.1 The following chapters present an assessment of the likely significant effects associated with the West Oxfordshire Local Plan in relation to the following topics:

- Air (**Chapter 7**);
- Biodiversity, flora and fauna (**Chapter 8**);
- Climatic factors (**Chapter 9**);
- Cultural heritage (**Chapter 10**);
- Human health (**Chapter 11**);
- Landscape (**Chapter 12**);
- Population and material assets (**Chapter 13**);
- Soil (**Chapter 14**); and
- Water (**Chapter 15**).

6.4.2 Each of the topic sections are presented in terms of baseline, impacts, mitigation and residual effects, where appropriate. The topics have been appraised in terms of plan-wide impacts and draw on all aspects of the SA process, including the findings presented for the assessment of policies and site allocations (see **Volume 3: Appendices** for the full assessments). The assessments include consideration of the impacts arising as a consequence of the inter-relationship between the different topics and identify secondary, cumulative and synergistic effects where they arise. The cumulative effects assessment is presented in **Chapter 16**.

7 Air

7.1 Baseline

- 7.1.1 Poor air quality is among the largest environmental risks to public health in the UK. Several objectives have been established in relation to air quality at the European, UK and regional levels seeking to reduce emissions of specific pollutants to minimise adverse effects on health and the environment.
- 7.1.2 Key legislation / PPPs include the Environment Act (2021)⁴⁰ which sets out air quality as a priority area, the Air Quality Plan for nitrogen dioxide (NO₂)⁴¹ and the Clean Air Strategy⁴², as well as the Oxfordshire County Council Air Quality Strategy (2023)⁴³, which outlines the vision and objectives for tackling air pollution across the county.
- 7.1.3 There are two small Air Quality Management Areas (AQMAs) within West Oxfordshire District: 'Chipping Norton' AQMA and 'Witney' AQMA (see **Figure 7.1**). Both AQMAs were declared in 2005 due to exceedances in NO₂⁴⁴. It is expected that both AQMAs will have met the criteria for revocation in 2026. WODC has addressed the elevated NO₂ concentrations in both Witney and Chipping Norton, by preparing Air Quality Action Plans (AQAPs) for 2023-2028, outlining measures to improve air quality in these areas. WODC's latest Air Quality Annual Status Report (ASR) (2025)⁴⁵ states that NO₂ levels are generally decreasing and remain below the national air quality objective in both AQMAs, indicating improving air quality; although, ongoing monitoring will be needed over the coming years to confirm this trend. The ASR also highlights a number of local actions to improve air quality, including electric vehicle charging infrastructure, active and public transport schemes, and road improvement schemes to ease congestion.
- 7.1.4 It is widely accepted that the effects of air pollution from road transport decreases with distance from the source of pollution. The Department for Transport (DfT) Transport Analysis Guidance states that "*beyond 200m from the link centre, the contribution of vehicle emissions to local pollution levels is not significant*"⁴⁶. Exposure to road transport associated emissions may have long term health impacts, which are likely to be most significant within 200m. Air pollution, particularly excessive nitrogen deposition, is also known to be harmful to the health and functioning of natural habitats. Within West Oxfordshire, the Oxford Meadows SAC is particularly vulnerable to air quality impacts primarily through vehicular emissions, due to its close proximity to the A40.

⁴⁰ Environment Act 2021. Available at: <https://www.legislation.gov.uk/ukpga/2021/30/contents/enacted> [Date accessed: 15/04/26]

⁴¹ DEFRA and DfT (2018) Air quality plan for nitrogen dioxide (NO₂) in UK. Available at: <https://www.gov.uk/government/publications/air-quality-plan-for-nitrogen-dioxide-no2-in-uk-2017> [Date accessed: 15/04/26]

⁴² DEFRA (2019) Clean Air Strategy. Available at: <https://www.gov.uk/government/publications/clean-air-strategy-2019/clean-air-strategy-2019-executive-summary> [Date accessed: 15/04/26]

⁴³ Oxfordshire County Council (2023) Air Quality Strategy 2023-2030. Available at <https://news.oxfordshire.gov.uk/download/e80d654a-8d0d-491f-bde4-b0871c83c527/oxfordshirecountycouncilcleanair2023to2030.pdf> [Date accessed: 15/04/26]

⁴⁴ DEFRA (2024) AQMAs declared by West Oxfordshire District Council. Available at: https://uk-air.defra.gov.uk/aqma/local-authorities?la_id=309 [Date accessed: 15/04/26]

⁴⁵ WODC (2025) Air Quality Annual Status Report (ASR), June 2025. Available at <https://www.westoxon.gov.uk/media/d1nbwdqn/air-quality-annual-report-2025.pdf> [Date accessed: 15/04/26]

⁴⁶ Department for Transport (2025) TAG Unit A3 Environmental Impact Appraisal. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/825064/tag-unit-a3-environmental-impact-appraisal.pdf [Date accessed: 15/04/26]

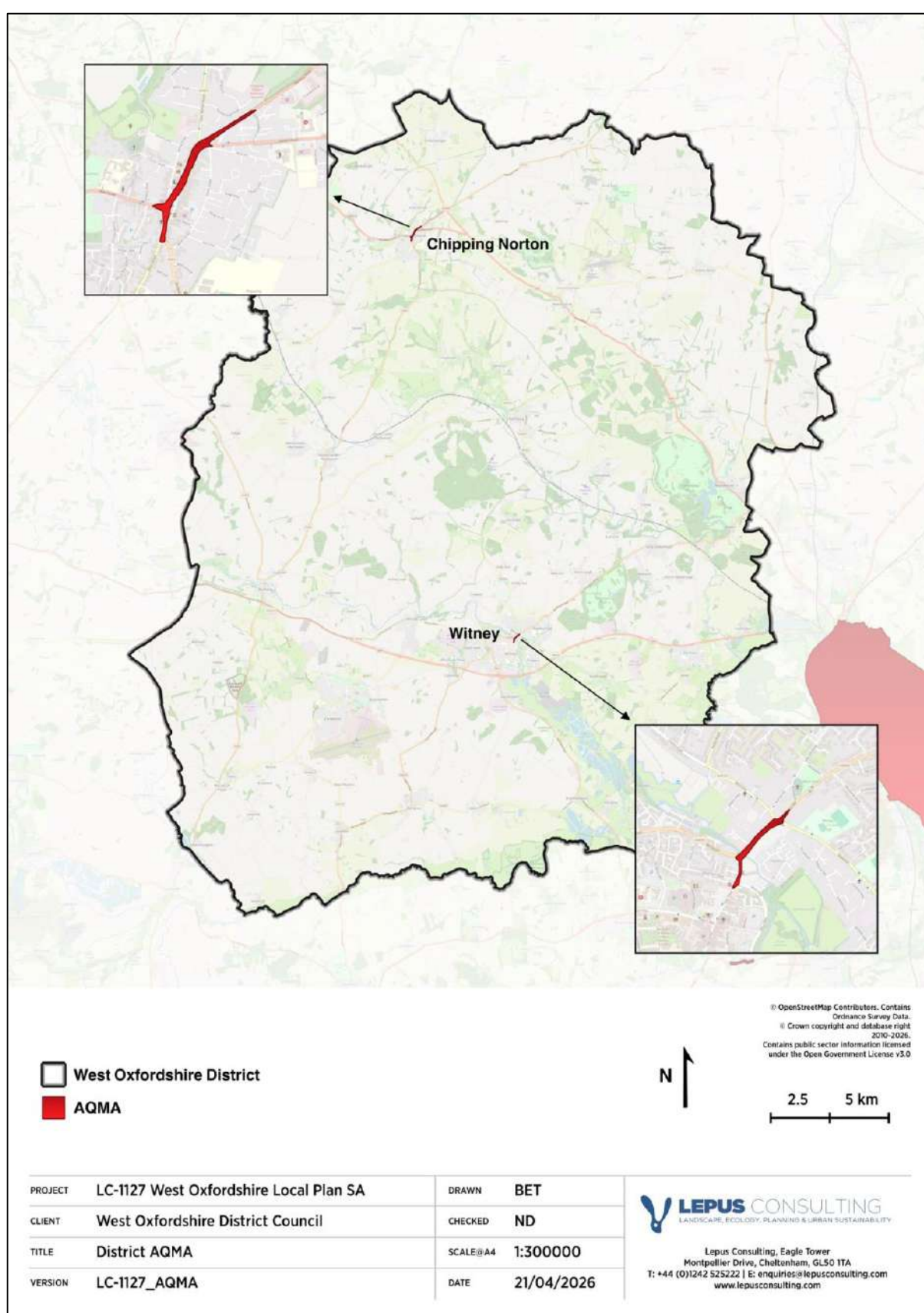


Figure 7.1: AQMAs within West Oxfordshire

Box 7.1: Summary of key sustainability issues: air quality

Key issues for air quality include:

- ⇒ According to the latest ASR, air quality within West Oxfordshire's two AQMAs continues to improve overall, with NO₂ concentrations falling at almost all monitoring locations. Only one site, West Street in Chipping Norton, recorded a small increase compared with the previous year, which the Council does not consider a cause for concern.
- ⇒ There is a need to change attitudes and behaviours to encourage less private car use and more active travel and use of public transport.
- ⇒ There is a shortage of suitable electric vehicle charging stations across the district to support the uptake of electric vehicles as well as electric public transport operating from Oxford.
- ⇒ The Oxford Meadows SAC is located close to the A40 and is therefore particularly susceptible to vehicular emissions. As a result, there is a need to reduce congestion and air pollution on the A40.

7.2 Evaluating the effect of the Local Plan on air

7.2.1 Air has been considered in the SA process under SA Objective 6: Air Quality, which seeks to protect and improve air quality.

Table 7.1: Summary of identified effects of the Local Plan on air

Identified effects on air	Mitigating Local Plan policies	Summary of residual effect
1  Increased emission of, and exposure to, air pollution The construction and occupation of c.18,318 new homes and c.29.5ha employment floorspace, and associated traffic, is likely to increase emissions of NO₂ and PM₁₀, contributing to a deterioration in local air quality. This may result in adverse effects on human health, particularly for vulnerable groups, and on ecological networks sensitive to eutrophication, acidification and toxicity. Effects are likely to be more pronounced where sites are located within 200m of AQMAs and major roads, where exposure to air pollution is higher.	• Policy CP6 (Design Excellence and Placemaking) requires development to incorporate sustainable transport, active travel and electric vehicle infrastructure, helping to reduce transport-related emissions. • Policy CP8 (Sustainable and Integrated Transport) promotes high-quality public transport and integrated sustainable travel, whilst ensuring transport infrastructure minimises noise and air pollution. • Policy DM1 (Green Infrastructure) supports the protection and enhancement of green infrastructure, providing benefits for pollutant filtration and local air quality. • Policy DM13 (Air Quality and Pollution) requires development that could adversely affect air quality, particularly near AQMAs and the Oxford Meadows SAC, to be supported by appropriate assessment and mitigation measures.	Despite technological and infrastructure improvements, the scale of proposed housing and employment growth is expected to increase traffic volumes and energy demand, resulting in higher emissions of pollutants (notably NO₂ and PM₁₀) that are unlikely to be fully mitigated by Local Plan policies alone. The transition to cleaner technologies, supported by the UK's net zero commitment and the shift towards zero-emission vehicles (with 80% of new cars and 70% of vans expected to be zero emission by 2030, rising to 100% by 2035), is likely to improve air quality over the longer term. The long-term effect on emissions and air quality is likely to be positive, but short-term negative effects are expected.

8 Biodiversity, flora and fauna

8.1 Baseline

- 8.1.1 The conservation of biological and geological diversity and the protection and monitoring of endangered and vulnerable species and habitats is of great importance. National and European policies identify a hierarchy of designations which aim to promote the protection and enhancement of the natural environment. Key PPPs include the 25 Year Environment Plan⁴⁷ and the Environmental Improvement Plan⁴⁸ which seek to halt biodiversity loss, promote nature recovery, and expand multi-functional green infrastructure (GI) networks.
- 8.1.2 The Local Nature Recovery Strategy (LNRS) for Oxfordshire was published in 2025⁴⁹, to set out a spatially targeted, partnership-led strategy identifying priority habitats, species and locations for action to restore nature, improve air and water quality, and address climate change through coordinated, nature-based solutions.

European sites

- 8.1.3 European sites provide valuable ecological infrastructure for the protection of rare, endangered and/or vulnerable natural habitats and species of exceptional importance within the EU. These sites consist of Special Areas of Conservation (SACs) designated under the Habitats Directive, and Special Protection Areas (SPAs) classified under the Birds Directive. Additionally, the NPPF requires that sites listed under the Ramsar Convention are to be given the same protection as fully designated European sites.
- 8.1.4 A small section of Oxford Meadows SAC lies within West Oxfordshire District in the east, with the remainder falling in the adjacent City of Oxford (see **Figure 8.1**). Oxford Meadows SAC is designated for its lowland hay meadows (*Alopecurus pratensis*, *Sanguisorba officinalis*) and creeping marshwort (*Apium repens*). The Site Improvement Plan (SIP) notes the SAC is vulnerable to hydrological changes and invasive species⁵⁰.
- 8.1.5 Other nearby European sites include Cothill Fen SAC (designated for alkaline fens and alluvial forests⁵¹) located approximately 3.2km to the south east of the district, Little Wittenham SAC (great crested newt⁵²) approximately 16km to the south east, Hackpen Hill SAC (chalk grassland⁵³) approximately 14km south, and North Meadow & Clattinger Farm SAC (lowland hay meadows⁵⁴) approximately 14km south west.

⁴⁷ HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf [Date accessed: 15/04/26]

⁴⁸ DEFRA (2025) Environmental Improvement Plan 2025. Available at: <https://www.gov.uk/government/publications/environmental-improvement-plan-2025> [Date accessed: 15/04/26]

⁴⁹ Oxfordshire County Council (2025) Oxfordshire's Local Nature Recovery Strategy. Available at: <https://www.oxfordshire.gov.uk/residents/environment-and-planning/local-nature-recovery-strategy> [Date accessed: 15/04/26]

⁵⁰ Natural England (2014) Site Improvement Plan: Oxford Meadows. Available at: <https://publications.naturalengland.org.uk/publication/4942743310696448> [Date accessed: 15/04/26]

⁵¹ Natural England (2018) Cothill Fen SAC Conservation Objectives. Available at: <https://publications.naturalengland.org.uk/publication/5691343946907648> [Date accessed: 15/04/26]

⁵² Natural England (2018) Little Wittenham SAC Conservation Objectives. Available at: <https://publications.naturalengland.org.uk/publication/6104670577623040> [Date accessed: 15/04/26]

⁵³ Natural England (2018) Hackpen Hill SAC Conservation Objectives. Available at: <https://publications.naturalengland.org.uk/publication/5182475147935744> [Date accessed: 15/04/26]

⁵⁴ Natural England (2018) North Meadow & Clattinger Farm SAC Conservation Objectives. Available at: <https://publications.naturalengland.org.uk/publication/6299293463871488> [Date accessed: 15/04/26]

- 8.1.6 A Habitats Regulations Assessment (HRA) has been prepared alongside the development of the Local Plan which provides an in-depth assessment of the potential threats and pressures to a number of European sites and analysis of potential impact pathways, including air pollution, public access and disturbance, and hydrological changes. The outputs of the HRA process will help to inform the SA, however the HRA outcomes are still pending at this stage.

National and local designations

- 8.1.7 A total of 30 Sites of Special Scientific Interest (SSSIs) lie within the Plan area, two of which ('Wychwood' and 'Chimney Meadows') are also designated as National Nature Reserves (NNRs), and one of which ('Saltway') is designated as a Local Nature Reserve (LNR). One further LNR, 'Crecy Hill', lies in the Plan area in the east and is managed by Tackley Parish Council. These designations are shown on **Figure 8.1**.
- 8.1.8 The Thames Valley Environmental Records Centre (TVERC) maintains a 'living list' of the Local Wildlife Sites (LWS) in each local authority area in Berkshire and Oxfordshire⁵⁵. 103 LWS lie wholly or partially within West Oxfordshire District, covering a range of habitat types including grassland, woodland and ponds. Nine further LWSs and three extensions to existing LWSs are proposed. These are shown in **Figure 8.2**.
- 8.1.9 Furthermore, 16 Local Geological Sites (LGS) lie wholly or partially in the district (see **Figure 8.2**), designated by the Oxfordshire Geology Trust, which exhibit important geological and geomorphological features⁵⁶.

Habitats and GI

- 8.1.10 West Oxfordshire contains approximately 2,000ha of ancient woodland (see **Figure 8.1**), and extensive areas of deciduous woodland priority habitat. Other priority habitats (see **Figure 8.2**) include good quality semi-improved grassland, found scattered throughout the north, and coastal and floodplain grazing marsh along the River Windrush and the River Thames corridors in the centre and south east, as well as some areas of traditional orchard throughout the district. Smaller proportions of lowland habitats are also present (calcareous grassland, dry acid grassland, fens, meadows). Careful consideration should be given during the plan-making process to the potential impacts on habitats and species of principle importance in accordance with the NERC Act 2006⁵⁷.
- 8.1.11 Multi-functional GI assets including natural and semi-natural features within the urban areas should also be conserved and enhanced to support ecosystem services and nature recovery.
- 8.1.12 Oxfordshire's Nature Recovery Network (NRN)⁵⁸, developed by TVERC, Wild Oxfordshire and the Berks, Bucks and Oxon Wildlife Trust (BBOWT), has informed the county's Local Nature Recovery Strategy (LNRS), which was adopted in 2025. Building on the existing Conservation Target Areas, the LNRS identifies priority habitats, species and opportunities to enhance habitat connectivity, strengthen ecological networks and support nature recovery across Oxfordshire.

⁵⁵ TVERC (2025) LWS 'living list' and locations. Available at: <https://www.tverc.org/cms/LWSLivingLists> [Date accessed: 15/04/26]

⁵⁶ TVERC (2024) Local Geological Sites. Available at: <https://www.tverc.org/cms/content/local-geological-sites> [Date accessed: 15/04/26]

⁵⁷ Natural Environment and Rural Communities Act 2006. Available at: <http://www.legislation.gov.uk/ukpga/2006/16/contents> [Date accessed: 15/04/26]

⁵⁸ Wild Oxfordshire (2022) Oxfordshire's Nature Recovery Network. Available at: <https://www.wildoxfordshire.org.uk/oxfordshires-nature/oxfordshires-nature-recovery-network> [Date accessed: 15/04/26]

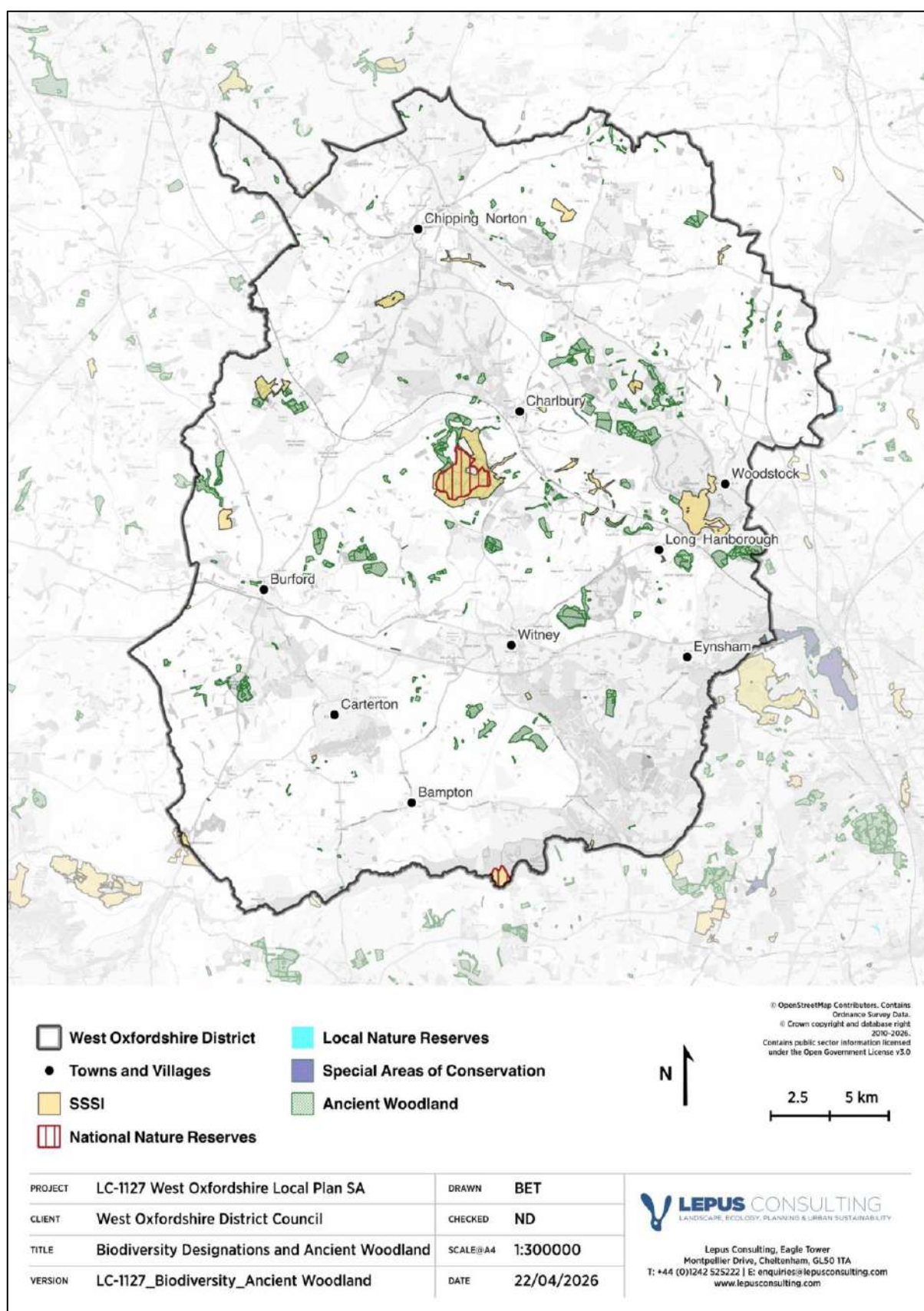


Figure 8.1: Biodiversity designations and ancient woodland within and around West Oxfordshire

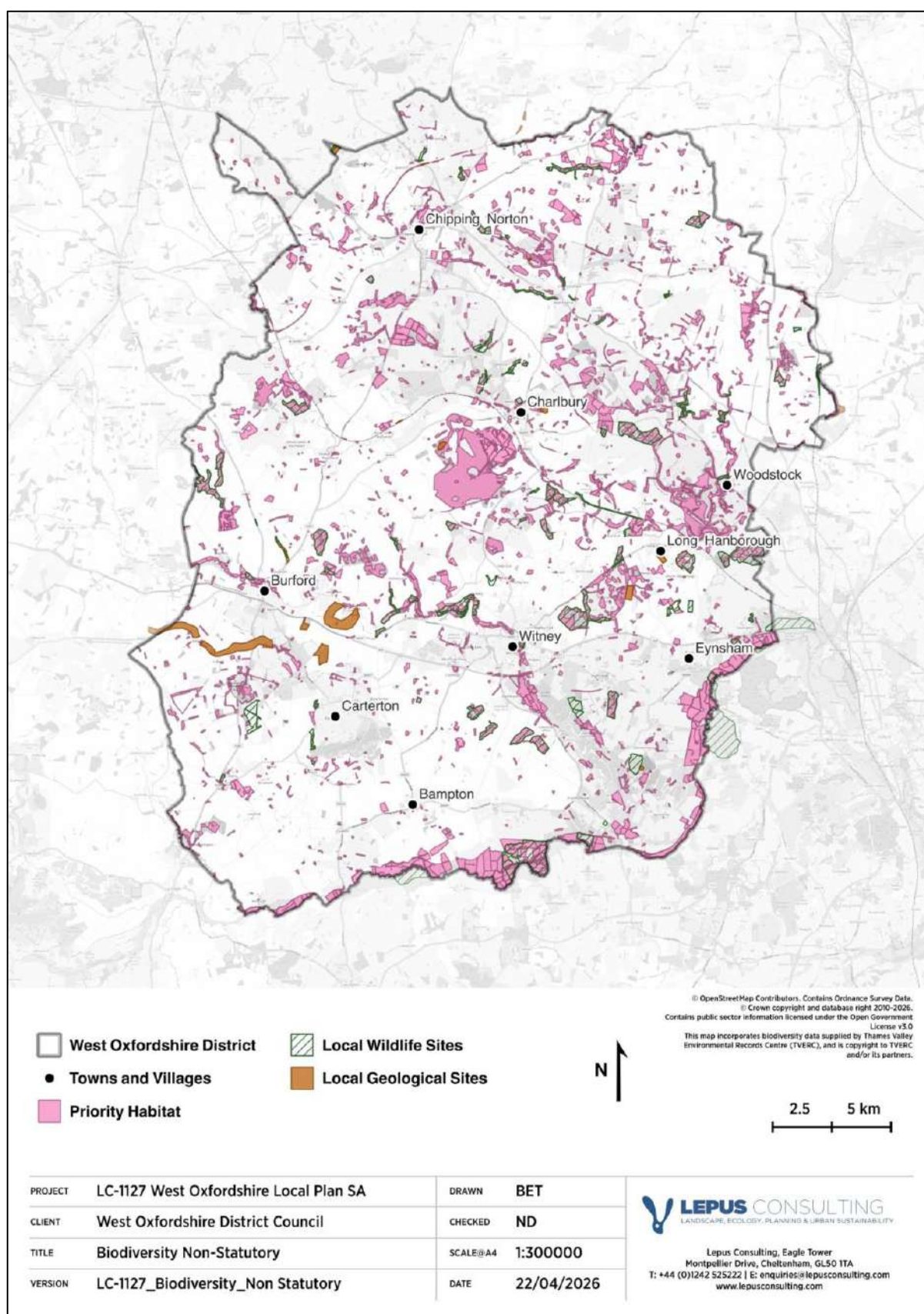


Figure 8.2: Non-statutory biodiversity designations within and around West Oxfordshire

Box 8.1: Summary of key sustainability issues: biodiversity, flora and fauna

Key issues for biodiversity, flora and fauna include:

- ⇒ New development in West Oxfordshire, alone or in-combination with other plans or projects, could have the potential to lead to adverse effects on the integrity of European sites, including Oxford Meadows SAC and Cothill Fens SAC, through various impact pathways including changes in water quality/quantity, air pollution and public access and disturbance. The HRA of the Local Plan will explore these potential effects in detail.
- ⇒ Oxfordshire supports some of the rarest grasslands in the country which need to be protected from the continued trends of habitat loss and fragmentation.
- ⇒ There is a need to create larger and more connected areas of high-quality habitats, and to assist farmers and landowners to identify financially viable ways of managing their land to provide greater benefits to nature.
- ⇒ Access to green spaces and volunteering opportunities need to be increased, to enable local people to keep in touch with nature and improve understanding and appreciation of the issues faced.
- ⇒ Impact pathways have been identified for the following European sites in the indicative HRA findings. These are subject to change pending the final HRA report. At this stage, no adverse effects on the integrity of European Sites are anticipated, however, the effects of vehicular emissions and recreational pressure on Oxford Meadows SAC remain uncertain:
 - **Oxford Meadows SAC** – Potential impact pathways identified include physical damage and loss of habitat, air pollution, changes to water quality and quantity, and recreation pressure.
 - **Cothill Fen SAC** – Potential impact pathways identified include air pollution and recreation pressure.
 - **Little Wittenham SAC** – Potential impact pathways identified include changes to water quality and quantity.

8.2 Evaluating the effect of the Local Plan on biodiversity, flora and fauna

- 8.2.1 Biodiversity, flora and fauna have been predominantly considered under SA Objective 3: Biodiversity and Geodiversity, which aims to conserve, enhance and restore the district's biodiversity and geodiversity.

Table 8.1: Summary of identified effects of the Local Plan on biodiversity, flora and fauna

Identified effects on biodiversity, flora and fauna	Mitigating Local Plan policies	Summary of residual effect
1  Threats or pressures to European sites Likely Significant Effects (LSEs) have been identified through HRA screening in relation to the Oxford Meadows SAC, Cothill Fen SAC and Little Wittenham SAC. Without mitigation, development proposed in the Local Plan could adversely affect the integrity of these European sites.	• CP10 (Nature Recovery) will ensure that all development contributes to the protection, enhancement and recovery of the natural environment, including designated biodiversity sites. • DM13 (Air Quality and Pollution) – will ensure that developments demonstrate compliance with the Habitat Regulations and ensure no adverse effect on the integrity of Oxford Meadows SAC from air pollution, given its sensitivity to nitrogen deposition.	The publication of the HRA is pending at the time of writing. However, the emerging HRA concludes that, subject to the completion of the remaining assessment work, the Local Plan is not expected to have an adverse effect on the integrity of any European site, either alone or in combination. While no adverse effects are anticipated for most impact pathways, the potential effects on air quality and recreational pressure on Oxford Meadows SAC remain uncertain pending the completion of further assessment.

Identified effects on biodiversity, flora and fauna	Mitigating Local Plan policies	Summary of residual effect
2  Threats or pressures to nationally designated biodiversity sites Development proposed in the SWLP has potential to result in adverse effects on nationally designated sites (SSSIs and NNRs), particularly where allocated sites are located adjacent to SSSIs, with risk of direct impacts on their special features. Sites which also fall within Impact Risk Zones (IRZs), indicating potential pathways for indirect effects and the need for consultation to identify and address impacts.	- Policy CP10 (Natural Recovery) supports the protection, enhancement and recovery of the natural environment, including nationally designated biodiversity sites. - Policy DM2 (Ecological Protection, Biodiversity Net Gain and Nature Recovery) requires development to follow the mitigation hierarchy and deliver biodiversity net gain through habitat enhancement, compensation and long-term management. - Supporting information and masterplans for several strategic allocations incorporate extensive green infrastructure to protect nearby SSSIs and reduce potential impacts from development.	Policy CP10 will help to mitigate adverse impacts on nationally designated biodiversity sites arising from the majority of development proposed in the Plan. However, the policies are not anticipated to fully mitigate adverse effects on SSSIs where proposed sites coincide with, or are located directly adjacent to, SSSIs. These sites should be subject to specific consultation with Natural England. Based on available information at the time of writing, there is potential for the Plan to result in a residual adverse effect on SSSIs within the Plan area. In line with the precautionary principle, at the time of writing, a potential long-term significant adverse effect on nationally designated biodiversity sites, including the fauna and flora they support, is identified.
3  Threats or pressures to locally designated / non-statutory biodiversity sites Development proposed in the Local Plan has potential to result in adverse effects on locally designated sites (including LNRs and LWS), through direct habitat loss and indirect effects such as recreational disturbance and air or water pollution. A number of allocated sites are located within or in close proximity to LWS and LNRs, increasing the risk of adverse impacts.	- Policy CP10 (Natural Recovery) supports the protection, enhancement and recovery of the natural environment, including locally designated wildlife and geological sites. - Policy DM2 (Ecological Protection, Biodiversity Net Gain and Nature Recovery) requires development to follow the mitigation hierarchy, deliver biodiversity net gain, and contribute to nature recovery, including the restoration of Local Wildlife Sites and the creation of priority habitats.	The policies will be likely to mitigate adverse impacts arising from development proposals which are situated in close proximity to locally designated and non-statutory biodiversity assets. However, the policies will not be expected to fully mitigate adverse effects on sites which coincide with or are directly adjacent to a LNR or LWS, where there is potential for direct habitat loss or degradation of the habitats associated with the designations. A potential long-term significant effect on locally designated and non-statutory biodiversity sites is identified.
4 	DM2 (Ecological Protection, Biodiversity Net Gain and Nature Recovery) requires development to	The policies are likely to enhance habitat connectivity and strengthen the resilience of ecological and GI networks

Identified effects on biodiversity, flora and fauna	Mitigating Local Plan policies	Summary of residual effect
Fragmentation of the ecological network The majority of allocated sites are located on previously undeveloped land, creating a risk of habitat loss and fragmentation within the ecological network. Numerous sites also overlap with priority habitats while a small number intersect with or are located adjacent to ancient woodland, increasing the potential for adverse effects on irreplaceable habitats. Potential impacts associated with loss of habitats includes: • Direct impacts: Permanent loss of priority habitats. • Secondary impacts: Reduced connectivity and increased fragmentation, leading to greater habitat vulnerability. • Indirect effects: Reduced ecological coherence.	follow the mitigation hierarchy and deliver high-quality BNG, using on-site enhancements, off-site contributions, and long-term management to protect and restore habitats. • DM6 (Trees and Hedgerows) supports the provision of new trees and hedgerows that will increase connectivity between habitats and enhance biodiversity. Specific reference is made to avoiding impacts on ancient woodland and ancient and veteran trees, including an implemented 50 metre buffer surrounding the woodland for new development. • DM4 (Light Pollution and Dark Skies) ensures that developments in proximity to sensitive habitats including woodlands provide a buffer zone to avoid intrusive lighting. • Supporting information and masterplans for several reasonable alternative strategic sites indicate that buffer zones would be provided around areas of ancient woodland to protect them from significant adverse effects associated with new development.	against current and future pressures. They support the conservation and expansion of GI coverage, along with the creation of new habitats, providing opportunities to improve connections between biodiversity features. Additionally, the policies promote the principles of the Local Nature Recovery Strategy (LNRS) for Oxfordshire⁵⁹. Overall, a long-term positive impact on green infrastructure opportunities is anticipated.

⁵⁹ Oxfordshire County Council (2024) Oxfordshire's Local Nature Recovery Strategy. Available at: <https://www.oxfordshire.gov.uk/residents/environment-and-planning/local-nature-recovery-strategy> [Date accessed: 13/03/26]

9 Climatic factors

9.1 Baseline

- 9.1.1 Anthropogenic climate change is predominantly the result of greenhouse gas (GHG) emissions. GHGs are emitted from a wide variety of sources, including transport, construction, agriculture and waste. Typically, development leads to a net increase in GHG emissions, although efforts can be made to help limit these increases.
- 9.1.2 Commitments to reduce GHG emissions have been introduced from the international level to the sub-regional level. The PPPs address policy development across all sectors and at all levels, combining both demand management (reduced energy consumption and increased efficiency of use) and supply-side measures (low carbon options and renewables). The Committee on Climate Change (CCC)'s latest progress report⁶⁰ discusses the need for further measures to be implemented by the government to ensure the UK meets the target of net zero by 2050.
- 9.1.3 The Environment Agency (EA) provides guidance on flood risk to inform plan-making and flood risk assessments, emphasising the need to account for climate change⁶¹. Various PPPs promote a strategic approach including avoiding development in flood risk areas, resilient design, Sustainable Drainage Systems (SuDS), biodiversity enhancement, and measures to address overheating and long-term maintenance.
- 9.1.4 WODC has declared a climate and ecological emergency and pledged to become a carbon neutral council by 2030, setting out a framework and key actions in the Carbon Action Plan and Climate Change Strategy⁶².

Carbon and energy

- 9.1.5 The latest UK local authority carbon emissions estimates⁶³ indicate that West Oxfordshire District's carbon dioxide (CO₂) emissions totalled 448.1 kilotonnes in 2023, representing the lowest total emissions of all Oxfordshire LPAs (see **Table 9.1**). However, in terms of per capita emissions, West Oxfordshire falls near the bottom with 3.8 tonnes per person.

Table 9.1: Estimated CO₂ emissions for Oxfordshire LPAs in 2023 (ktCO₂)⁶⁴

Local Authority	Industry	Commercial	Public Sector	Domestic	Transport	Agriculture	Total	Per Capita (tCO ₂)
Cherwell	114.8	53.9	18.8	183.8	530.5	32.2	924.2	5.6
Oxford	86.2	111.7	68.7	143.2	117.0	0.5	528.5	3.2
South Oxfordshire	51.4	73.8	16.5	188.5	349.5	35.2	670.1	4.4
Vale of White Horse	50	75.7	20.4	166.8	358.5	30.2	689.0	4.7
West Oxfordshire	40.4	41.1	18.4	145.8	190.4	38.2	448.1	3.8

⁶⁰ CCC (2024) Reducing UK emissions: 2024 Progress Report to Parliament. Available at:

<https://www.theccc.org.uk/publication/progress-in-reducing-emissions-2024-report-to-parliament/> [Date accessed: 16/04/26]

⁶¹ Environment Agency (2022) Flood risk assessments: climate change allowances. Available at: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances> [Date accessed: 15/04/26]

⁶² West Oxfordshire District Council (2021) Climate Change Strategy for West Oxfordshire 2025-2030. Available at:

<https://www.westoxon.gov.uk/environment/climate-action/climate-change-strategy/> [Date accessed: 15/04/26]

⁶³ Department for Energy Security and Net Zero (2023) UK local authority and regional carbon dioxide emissions national statistics: 2005 to 2023. Available at: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-statistics-2005-to-2023> [Date accessed: 15/04/26]

⁶⁴ Ibid.

Local Authority	Industry	Commercial	Public Sector	Domestic	Transport	Agriculture	Total	Per Capita (tCO ₂)
Oxfordshire total	342.8	356.2	142.7	828	1,545.9	136.4	3,259.9	4.3
England total	36,882.1	24,484.8	8,312.0	61,082.4	92,861.7	6,020.1	227,546.0	3.9

9.1.6 The majority of West Oxfordshire's CO₂ emissions arise from transport, followed by the domestic sector (see **Figure 9.1**), with smaller contributions from industry, commercial, public sector and agriculture. Emissions have generally decreased across all sectors over time, reflecting UK-wide trends driven largely by reduced emissions from power stations and industrial combustion, as well as the impact of the pandemic in 2020. Although, 2021 saw a slight increase in all sectors reflecting the trend for the rest of the UK, attributed to COVID-19 restrictions easing and colder temperatures increasing heating demand.

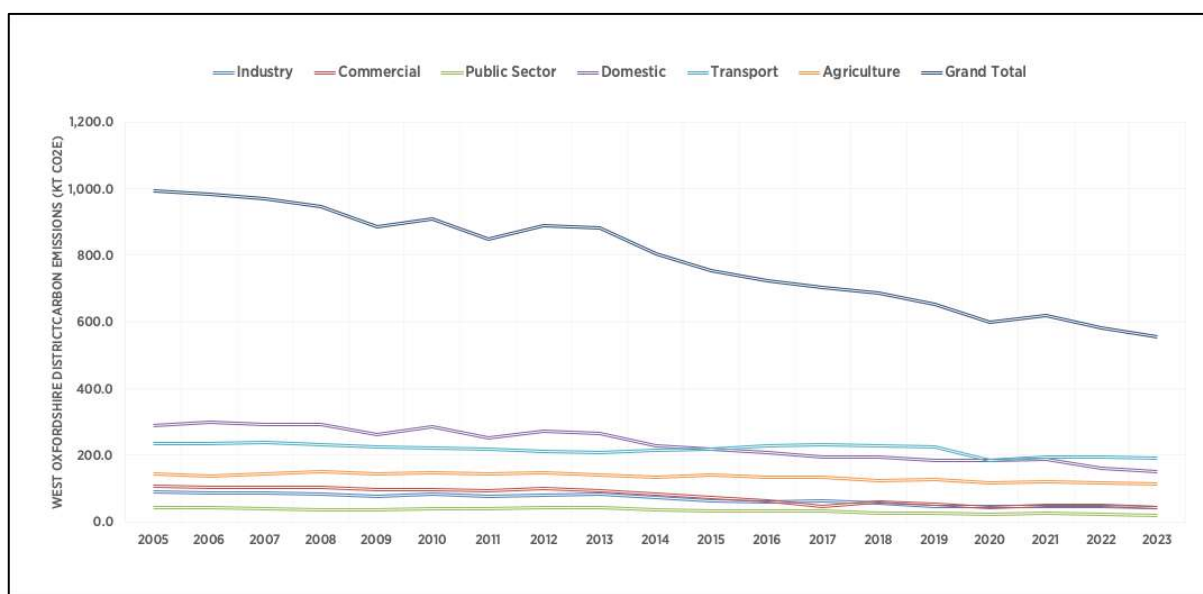


Figure 9.1: Estimated CO₂ emissions and sources for West Oxfordshire District between 2005 and 2023⁶⁵

9.1.7 According to the Renewable Energy and Low Carbon Energy Assessment and Strategy (2016)⁶⁶, there are four large scale renewable energy generating facilities operating in the district including nine solar farms and one anaerobic digestion facility that are either operational or have been approved. The study identified potential for further renewable and low-carbon energy development in West Oxfordshire, but emphasised the need to balance this with protecting the district's character, biodiversity and the distinctiveness of its towns and villages. It is recommended that this study is updated to review the potential for renewable and low carbon energy schemes during the new Plan period and beyond.

⁶⁵ Ibid.

⁶⁶ LDA Design (2016) Renewable Energy and Low Carbon Energy Assessment and Strategy for West Oxfordshire, October 2016. Available at: <https://www.westoxon.gov.uk/media/ys2okqht/renewable-energy-and-low-carbon-energy-assessment-2016.pdf> [Date accessed: 15/04/26]

- 9.1.8 There may also be opportunities for carbon sequestration, as recognised in the 'Pathways to a zero carbon Oxfordshire' report⁶⁷. Furthermore, the WODC Carbon Action Plan 2024-2030⁶⁸, which sets out the Council's own organisational goals with regard to climate action, also states that *"As part of the new Local Plan, a Carbon Offset and Inset Fund should be established to provide ring-fenced funding from s106 developer contributions for carbon-reduction projects across the district"*.

Flooding

- 9.1.9 Climate change is anticipated to increase the risk of extreme weather events, leading to an increase in the frequency and severity of flooding. Surface water flooding in urban areas may increase in the incidence of more torrential and frequent rainfall events, especially during winter.
- 9.1.10 West Oxfordshire District is affected to varying degrees by fluvial (river) flooding and groundwater flooding. A small portion of the district lies within Flood Zones 2 and 3 (see **Figure 9.2**). These flood zones are most prominent along the River Thames which comprises the southern border of the district, as well as around Witney due to its proximity to the River Windrush. Additionally, small areas of surface water flood risk (SWFR) can be found within the district, which primarily occurs along watercourses in the south east and the north of the district (see **Figure 9.3**).
- 9.1.11 Careful consideration should be given to the level of flood risk new residents are exposed to, as well as the impacts of development in the present and future. Allowing for the impacts of climate change helps to minimise vulnerability whilst providing greater resilience to flooding by anticipating changes to various factors including the following:
- Peak river flows;
 - Peak rainfall intensities;
 - Sea level rise;
 - Offshore wind speeds;
 - Upstream land management;
 - Water retention; and
 - Natural floodplains.
- 9.1.12 Climate change allowances are informed by projections under different CO₂ scenarios. In 2025⁶⁹, WODC commissioned a Strategic Flood Risk Assessment (SFRA)⁷⁰ to map flood risk across the district and support the new Local Plan. The assessment identifies fluvial and surface water flooding, alongside climate change impacts, as the main risks, and advises steering development away from high-risk areas while managing residual risk through measures such as SuDS and site-specific flood risk assessments.

⁶⁷ Environmental Change Institute (2021) Pathways to a zero carbon Oxfordshire. Available at: <https://www.eci.ox.ac.uk/sites/default/files/2022-09/PazCo-summary.pdf> [Date accessed: 15/04/26]

⁶⁸ WODC (2024) Carbon Action Plan 2024 – 2030. Available at: <https://meetings.westoxon.gov.uk/documents/s10086/Annex%20A%20-%20Carbon%20Action%20Plan%202023.02.24.pdf> [Date accessed: 15/04/26]

⁶⁹ WHS (2025) West Oxfordshire Level 1 Strategic Flood Risk Assessment. Available at: https://www.westoxon.gov.uk/media/rv1hg0sh/west-oxfordshire-district-council-level-1-sfra_v2-0.pdf [Date accessed: 16/04/26]

⁷⁰ WHS (2026) Level 2 Strategic Flood Risk Assessment – West Oxfordshire District Council.

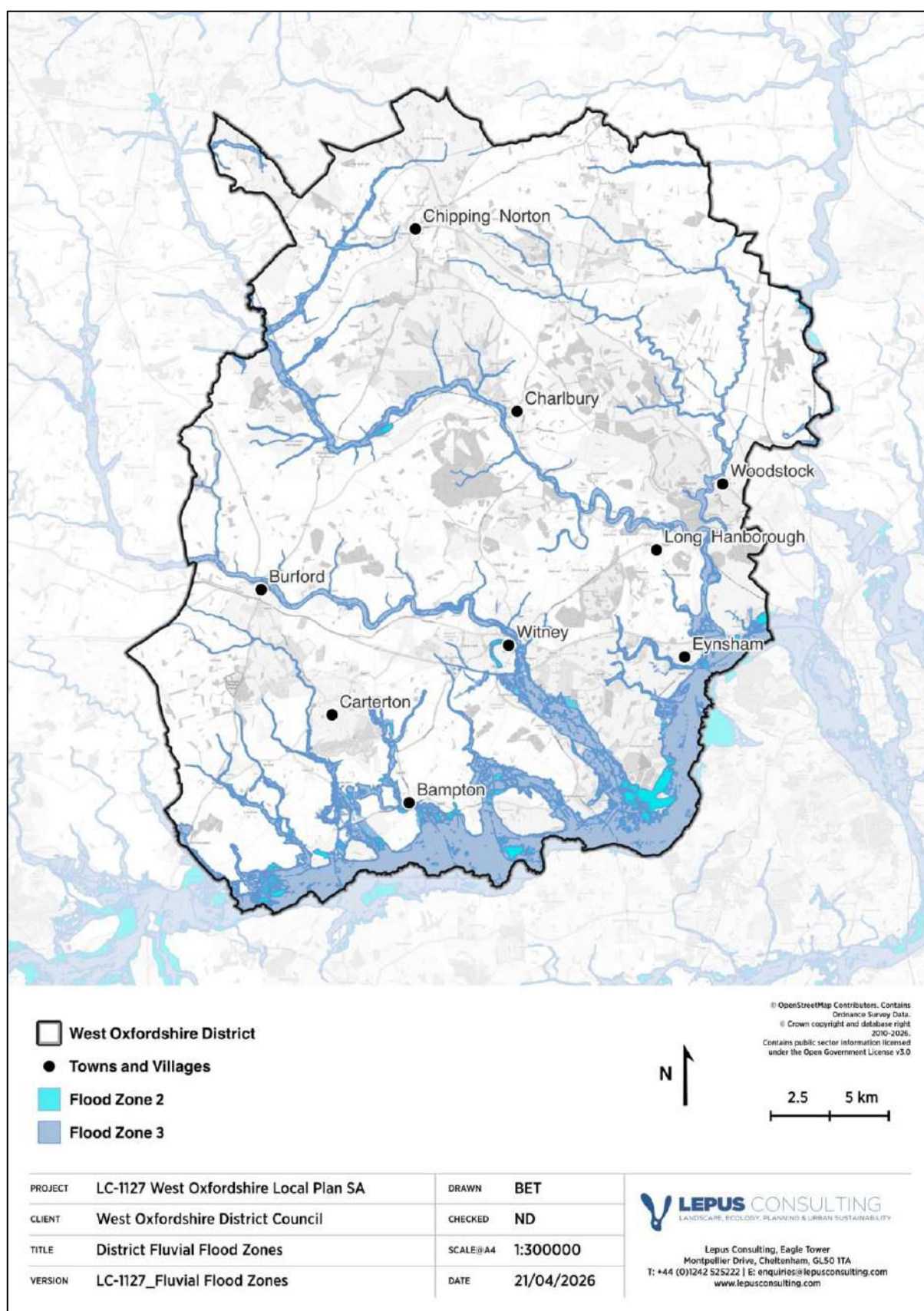


Figure 9.2: Fluvial flood risk in West Oxfordshire

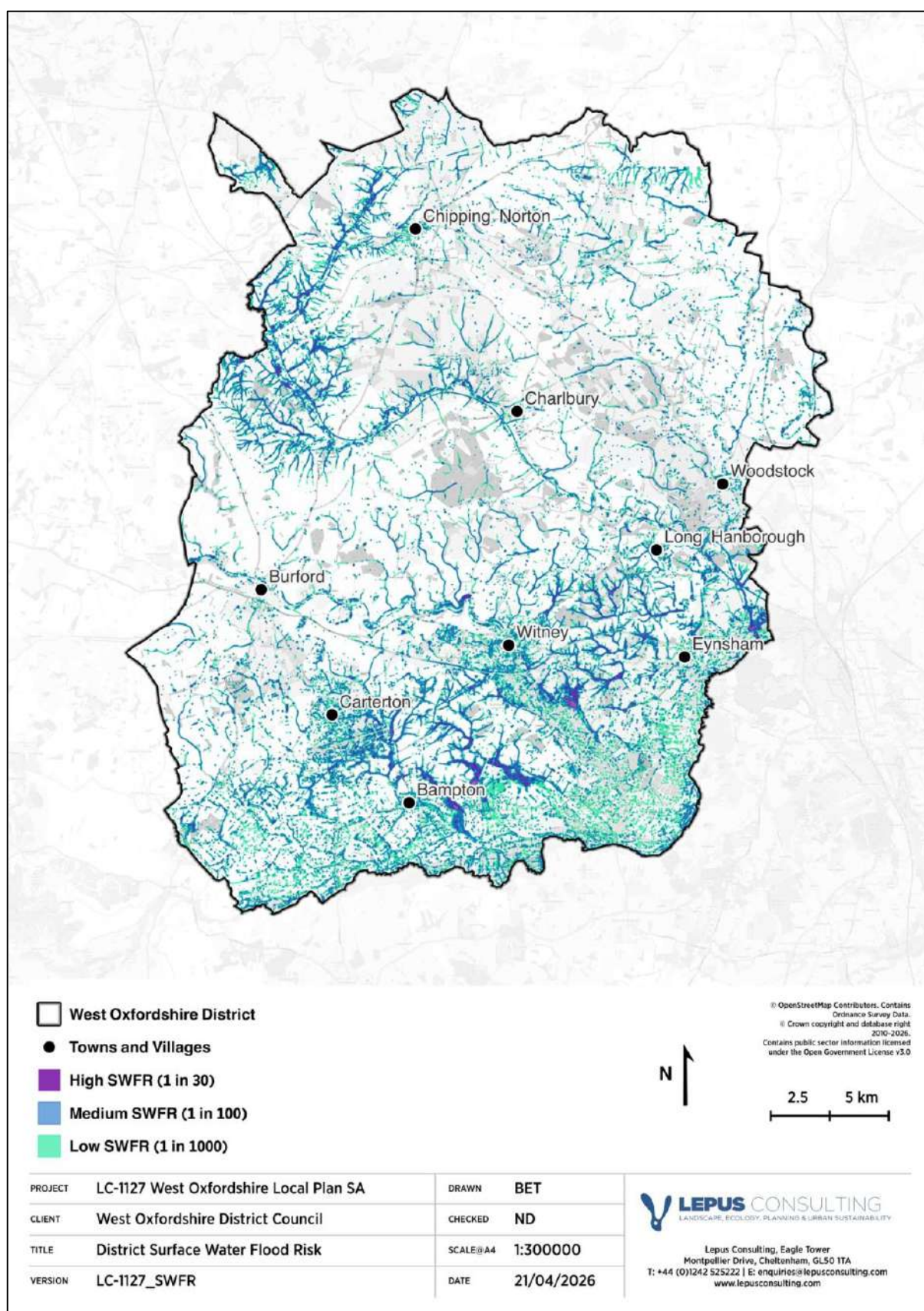


Figure 9.3: Extent of surface water flood risk in West Oxfordshire

Green Infrastructure

- 9.1.13 West Oxfordshire's Green Infrastructure (GI) network has an important role to play in providing ecosystem services. A well-managed and robust GI network can provide many benefits including for human health, climate change adaptation and wildlife value, as well as integrating GI within the Oxfordshire Local Nature Recovery Strategy⁷¹ (see **Chapter 8** – biodiversity, flora and fauna). GI can play an important role in helping urban areas adapt to climate change, by filtering airborne pollutants, providing shade and local cooling, carbon sink functions, and reducing surface water runoff⁷². The water environment (such as canals, rivers and ponds) can also be referred to as 'blue infrastructure' and often works alongside GI to provide multi-functional benefits including building resilience to climate change and acting as wildlife refuges and corridors.
- 9.1.14 The previous Interim GI Study (2011)⁷³ identified a range of GI assets within the area, including parks and gardens, greenspaces, green corridors and sports grounds. The Study identifies key characteristics and issues regarding GI and opportunities for enhancement. In addition, the Natural England GI Framework highlights a lack of available greenspace for local residents, increasing demand for an extensive GI network⁷⁴. The conservation and enhancement of the historic environment is also a consideration when implementing GI, as newly created or altered habitats will sit within the historic landscape of West Oxfordshire (see **Chapter 10** – cultural heritage).

Box 9.1: Summary of key sustainability issues: climatic factors

Key issues for climatic factors include:

- ⇒ There is a need to respond to climate change by developing further renewable and low carbon technologies in West Oxfordshire without compromising the distinctive biodiversity and landscape qualities of the district. It is also important to incorporate energy efficiency measures such as through retrofitting existing buildings to reduce carbon footprint.
- ⇒ Fluvial flooding, surface water flooding and increased impacts from climate change all pose significant risks to West Oxfordshire, particularly in the south of the district. Flood prevention schemes, surface water run-off management and the incorporation of effective sustainable drainage systems (SuDS) should be a priority for new developments.
- ⇒ There is a need to increase the quality, quantity and connectivity of Green and Blue Infrastructure to provide multi-functional benefits including improved carbon storage, urban cooling, natural flood resilience/flood water storage, and provide a more attractive public realm to encourage active travel.
- ⇒ A range of further risks linked to climate change may affect the Plan area, including increased risk of injury and death as a result of hotter summers and more severe storm events/flooding, adverse effects on water quality, changes in species distributions, and potential soil shrinkages and subsidence as a result of increased drought and flooding events.

⁷¹ Oxfordshire County Council (2025) Oxfordshire LNRS. Available at: <https://www.oxfordshire.gov.uk/residents/environment-and-planning/local-nature-recovery-strategy> [Date accessed: 16/04/26]

⁷² Landscape Institute (no date) Green Infrastructure (GI). Available at: <https://www.landscapeinstitute.org/policy/green-infrastructure/> [Date accessed: 16/04/26]

⁷³ West Oxfordshire District Council (2011) Interim West Oxfordshire Green Infrastructure Study. Available at: <https://www.westoxon.gov.uk/media/dyduqtn/interim-green-infrastructure-study-june-2011.pdf> [Date accessed: 16/04/26]

⁷⁴ Natural England (2021) Green Infrastructure. Available at: <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Map.aspx> [Date accessed: 16/04/26]

9.2 Evaluating the effect of the Local Plan on climatic factors

9.2.1 Throughout the SA process, climate change has been considered under SA Objective 1: Climate Change Mitigation which seeks to minimise West Oxfordshire's contributions towards climate change and SA Objective 2: Climate Change Adaptation which seeks to plan for the anticipated levels of climate change. However, it should be noted that climate change is a cross-cutting theme with relevance across all objectives of the SA Framework and SEA topics.

Table 9.2: Summary of identified effects of the Plan of climatic factors

Identified effects on climatic factors	Mitigating Local Plan policies	Summary of residual effect
1  Risk of fluvial and tidal flooding (present and future) Development within Flood Zones 2 or 3 will locate site end users in areas at risk of fluvial flooding, may increase the risk of damage to property and human health in the immediate area, and/or contribute to exacerbation of flood risk in surrounding areas. The majority of allocated sites lie in Flood Zone 1; however, effects have been identified for those sites which are located partially within Flood Zone 2 or Flood Zone 3, which are at higher risk of flooding.	- CP5 (Water Environment) will ensure proposals address flood risk from all potential sources, including surface water, groundwater, fluvial and sewer flooding. Major developments must be accompanied by a Sustainability Statement that outlines how the requirements of the policy have been met, including for flood risk. - CP1 (Climate Change) requires development proposals to demonstrate resilience to climate change impacts including minimising food risk and incorporating SUDs and natural flood management strategies, including GI and nature-based solutions. - WIT3 (Windrush Valley) supports incorporation of natural flood management techniques including restoration of floodplain meadows along the River Windrush and its tributaries. Requires development to avoid areas important for natural flood management.	Allocated sites that did not pass the Sequential Test with regard to fluvial/tidal flood risk have been considered in more detail within the Level 2 SFRA⁷⁵, which includes application of the Exception Test. The SFRA includes a summary of required actions to ensure that development will be safe and consistent with national policy. Subject to achieving the recommendations set out in the Level 2 SFRA, including completion of further site-specific flood risk assessments, it is likely that the plan will have a negligible effect on fluvial/tidal flooding.
2  Surface water flood risk Development in areas of surface water flood risk may lead to safety implications for site end users, and further exacerbate flood risk in the surrounding area. However, effects have been identified for those sites which are located partially within areas of medium or high SWFR, which are at higher risk of flooding.	- CP5 (Water Environment) states that development must address flood risk from all potential sources, including surface water, groundwater, fluvial and sewer flooding. Sustainable Drainage Systems (SuDS) must be incorporated into all developments to manage surface water runoff. Major developments must be accompanied by a Sustainability Statement that outlines how the requirements of the policy have been met, including for flood risk. - WIT3 (Conservation and Management of the Windrush Valley) supports	Allocated sites that did not pass the Sequential Test with regard to SWFR have been considered in more detail within the Level 2 SFRA, which includes application of the Exception Test. The SFRA includes a summary of required actions to ensure that development will be safe and consistent with national policy. Subject to achieving the recommendations set out in the Level 2 SFRA, including completion of further site-specific

⁷⁵ WHS (2026) Level 2 Strategic Flood Risk Assessment – West Oxfordshire District Council.

Identified effects on climatic factors	Mitigating Local Plan policies	Summary of residual effect
	incorporation of natural flood management techniques to reduce surface water runoff along the River Windrush and its tributaries. Requires development to avoid areas important for natural flood management. DM1 (Green Infrastructure) sets out the need to include protect and enhance well-managed green and blue infrastructure that will provide multi-functional benefits including for absorbing, storing and slowing the flow of surface water.	flood risk assessments, it is likely that the plan will have a negligible effect on SWFR.
3  Increased GHG emissions The proposed development of 18,318 homes and a significant amount of new employment floorspace within West Oxfordshire will be likely to increase GHG emissions to some extent through increased energy demand associated with the occupation of new dwellings and employment premises, transport-related emissions, and the production and use of materials during construction / release of embodied carbon associated with redevelopment sites. This impact will be expected to contribute towards cumulative effects which exacerbate global climate change issues such as sea level rise and extreme weather events.	- CP1 (Climate Change) requires new developments to support the UK's net zero target by minimising carbon emissions, maximising energy efficiency and renewable energy use, reusing resources, incorporating climate-resilient design, and major developments demonstrating through a Climate Impact Assessment (CIA) how they will mitigate and adapt to climate change. - CP6 (Design Excellence and Placemaking) requires all development to deliver high-quality, sustainable design. This likely supports energy efficiency, low-carbon construction methods, and climate resilience in their design as highlighted in Part 12 of the West Oxfordshire Design Guide. - CP8 (Sustainable Transport) requires development to be designed to support active and low-carbon travel modes. - DM9 (Achieving Net-Zero Carbon Development) requires all new development to achieve net-zero operational carbon, reduce embodied carbon, and to be designed for climate resilience. - DM11 (Retrofitting for Energy Efficiency, Carbon Reduction and Climate Resilience) encourages developments to incorporate energy-saving measures, renewable energy technologies, and strategies for adapting to climate challenges. - Supporting information and masterplans for several reasonable alternative strategic sites include the provision of low carbon	Although the relevant policies will be expected to have a positive impact in helping to reduce GHG emissions, particularly in regard to energy efficient design and low carbon sources, these measures are not expected to fully mitigate the impacts associated with the large quantum of growth expected from the Plan. An increase in GHG emissions as a consequence of the proposed development is expected to be a medium-term significant adverse effect, pending effective implementation of net-zero commitments.

Identified effects on climatic factors	Mitigating Local Plan policies	Summary of residual effect
	technologies to reduce emissions related to the proposed development, such as solar farms, heat pumps and provision of electric vehicle infrastructure.	
4  Loss of multi-functional GI Although the Local Plan allocates a small number of sites on previously developed land, the proposed development of the remaining allocations will cumulatively result in the loss of a significant area of previously undeveloped land or land with environmental / ecological value. Multi-functional GI is vital in helping to reduce adverse impacts of climate change.	- DM1 (Green Infrastructure) promotes the protection, enhancement, and expansion of West Oxfordshire's GI network, with likely multi-functional benefits including improving air and water quality. - CP10 (Nature Recovery) will ensure that all development contributes to the protection, enhancement and recovery of the natural environment, including designated biodiversity sites.	Although there may be some loss of previously undeveloped land associated with development sites that comprise or contain greenfield land, various Local Plan policies seek to conserve and enhance multi-functional green and blue infrastructure across the Plan area as a whole. Supporting the delivery of GI throughout the Plan area, a positive effect is expected with regard to West Oxfordshire's ability to adapt to climate change.

10 Cultural heritage

10.1 Baseline

- 10.1.1 Historic environment priorities from international to local levels seek to address a range of issues, particularly in relation to the conservation and enhancement of heritage assets that are irreplaceable and play an important role in placemaking and the quality of life.
- 10.1.2 National and local policy and guidance seek to protect the significance of designated and non-designated heritage assets and their settings. Such assets include but are not limited to Listed Buildings, Conservation Areas (CAs), Scheduled Monuments (SMs), Registered Parks and Gardens (RPGs), and non-designated archaeological remains. Various PPPs, including the West Oxfordshire Design Guide Supplementary Planning Document (SPD) (2016)⁷⁶ and the Oxfordshire Historic Landscape Characterisation (2017)⁷⁷ seek to ensure that cultural aspects of landscapes are recognised and protected against inappropriate development, encourage recognition of the potential and actual value of unknown and undesignated assets, and encourage the conservation and enhancement of sites and landscapes of archaeological and heritage interest so that they may be enjoyed by both present and future generations.
- 10.1.3 Historic England advocates the seeking of opportunities alongside development for delivering heritage-led regeneration⁷⁸, creating, revealing or enhancing local distinctiveness, encouraging the use of traditional building skills, and promoting climate change resilience and innovative reuse of historic buildings where appropriate⁷⁹.
- 10.1.4 The Local Plan will also have a role to play in establishing cross-cutting provisions relating to development, including between the historic environment and the functionality of open spaces and landscape connectivity.

Heritage assets

- 10.1.5 West Oxfordshire District contains a large number of historic assets which are distributed across the Plan area (see **Figures 10.1** and **10.2**). Within West Oxfordshire there are 42 Grade I Listed Buildings, 214 Grade II* Listed Buildings, 2,950 Grade II Listed Buildings, 17 RPGs, 139 SMs and 53 CAs. The Blenheim Palace World Heritage Site (WHS) also lies in the east of district.

⁷⁶ West Oxfordshire District Council (2016) Design Guide. Available at: <https://www.westoxon.gov.uk/planning-and-building/planning-policy/supplementary-planning-documents/> [Date accessed: 16/04/26]

⁷⁷ Oxfordshire District Council (2017) Oxfordshire Historic Landscape Characterisation. Available at: <https://www.oxfordshire.gov.uk/residents/environment-and-planning/archaeology/landscape-characterisation> [Date accessed: 16/04/26]

⁷⁸ BPF (2017) Heritage Works: A toolkit of best practice in heritage regeneration. Available at: <https://bpf.org.uk/media/xmefjgb/heritage-works-2017-for-web.pdf> [Date accessed: 16/04/26]

⁷⁹ Historic England (2016) Sustainability Appraisal and Strategic Environmental Assessment – Historic England Advice Note 8. Available at: <https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/> [Date accessed: 16/04/26]

- 10.1.6 There are eight heritage assets within West Oxfordshire which are listed on Historic England's Heritage at Risk Register. These include seven SMs and one Grade II* Listed Building 'Church of St Nicholas, Kiddington Park'. In line with the West Oxfordshire Design Guide SPD, it is crucial that the Council consider impacts development may have upon and ways to enhance the setting, structure or character of any listed building, which are at considered 'at risk'⁸⁰. WODC could also consider conducting its own assessment of 'at risk' heritage assets, in order to additionally consider potential impacts on Grade II Listed Buildings, which are not considered on the 'at risk' register outside London besides places of worship.
- 10.1.7 The Oxfordshire Historic Landscape Characterisation (HLC)⁸¹ recognises how all parts of the landscape, including West Oxfordshire's rural landscapes, have historic value and how this has been influenced over time by natural and human activities. As part of the HLC work, the historic landscape of Oxfordshire was digitally mapped using data from the Historic Environment Record (HER).
- 10.1.8 Non-designated heritage assets in West Oxfordshire do not have statutory protection. Many of these are identified within CAs and contribute to the distinctive character of the historic landscape⁸². This includes 980 Locally Listed Buildings, which do not meet the criteria for being nationally listed, however may still be of architectural or historic interest⁸³. Additionally, there are 84 Article 4 Directions in West Oxfordshire, which enable the withdrawal of specified permitted development rights across a defined area⁸⁴.
- 10.1.9 Impacts on heritage assets will be largely determined by the specific layout and design of development proposals. The level of impact will be assessed based on the nature and significance of, and proximity of the proposal to, the heritage asset in question, using professional judgement and with reference to evidence base documents.
- 10.1.10 Adverse impacts on heritage assets can include direct loss or truncation of an asset, impacts on the existing setting of the asset and the character of the local area, as well as adverse impacts on views of, or from, the asset. These negative impacts are expected to be long-term and irreversible. It is anticipated that the West Oxfordshire Local Plan will require a Heritage Statement and/or an Archaeological Desk-Based Assessment to be prepared to accompany future planning applications, where appropriate.

⁸⁰ West Oxfordshire District Council (2016) Design Guide. Available at: <https://www.westoxon.gov.uk/planning-and-building/planning-policy/supplementary-planning-documents/> [Date accessed: 23/04/24]

⁸¹ Oxfordshire District Council (2017) Oxfordshire Historic Landscape Characterisation. Available at: <https://www.oxfordshire.gov.uk/residents/environment-and-planning/archaeology/landscape-characterisation> [Date accessed: 16/04/26]

⁸² West Oxfordshire District Council (2018) West Oxfordshire Local Plan 2031: Environmental and Heritage Assets. Available at: <https://www.westoxon.gov.uk/media/gmncbxu3/8-environmental-and-heritage-assets.pdf> [Date accessed: 16/04/26]

⁸³ West Oxfordshire District Council (no date) Listed Buildings. Available at: <https://www.westoxon.gov.uk/planning-and-building/historic-buildings-and-conservation/listed-buildings/> [Date accessed: 16/04/26]

⁸⁴ UK Government (2023) When is permission required? Available at: <https://www.gov.uk/guidance/when-is-permission-required#article4> [Date accessed: 16/04/26]

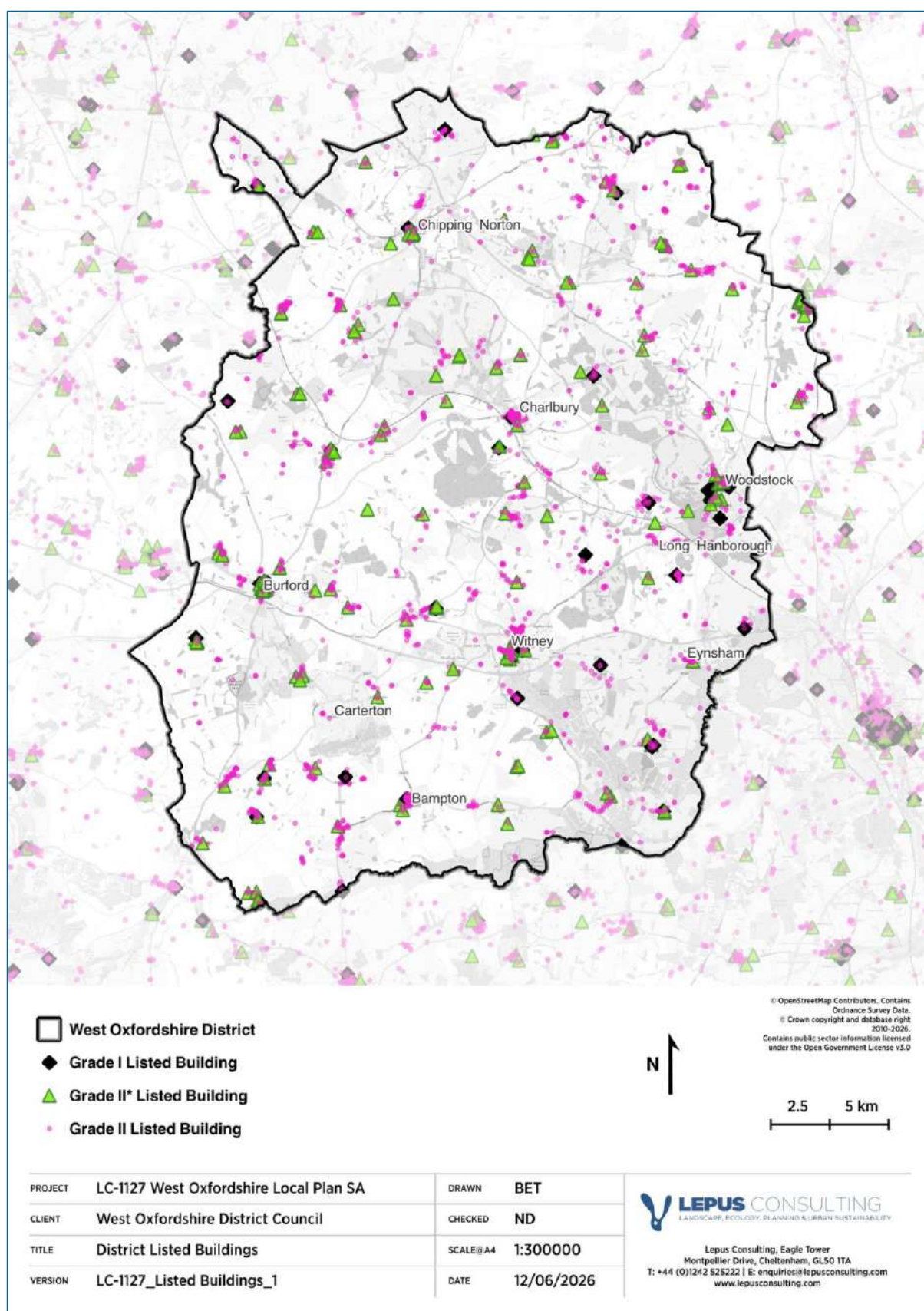


Figure 10.1: Listed buildings in West Oxfordshire

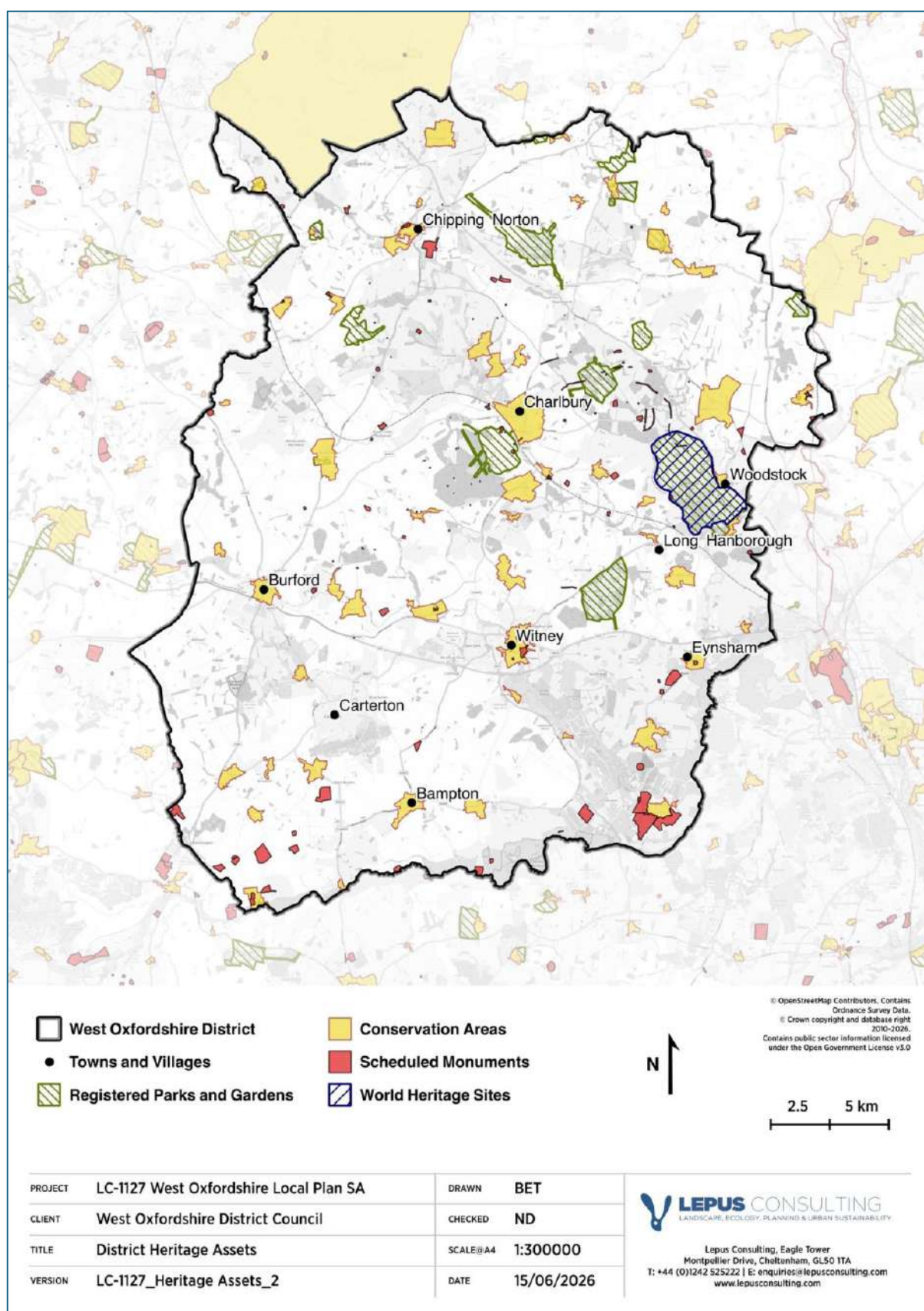


Figure 10.2: Heritage assets in West Oxfordshire

Box 10.1: Summary of key sustainability issues: cultural heritage

Key issues for cultural heritage include:

- ⇒ West Oxfordshire's rich cultural heritage comprises a large quantity of designated and non-designated historic assets. Proposals for development will need to carefully consider potential impacts on the significance of heritage assets including their setting, in order to minimise threats from increased housing demand and maintain or where possible enhance local character.
- ⇒ Careful consideration will be needed for any proposed development that could affect the Blenheim Palace World Heritage Site and its setting.
- ⇒ Eight historic assets within the district are on the heritage at risk register and need to be protected from further deterioration to their structure, setting or character from impacts such as recreational, construction and increased pollution.
- ⇒ There is a need to improve the energy efficiency of historic buildings and take into account their embodied carbon value when considering their retention and re-use, rather than replacing heritage assets with new development.
- ⇒ Archaeological remains, both seen and unseen, have the potential to be adversely affected by new development.

10.2 Evaluating the effect of the Local Plan on cultural heritage

- 10.2.1 Cultural heritage is predominantly considered under SA Objective 5: Cultural Heritage, which seeks to conserve and enhance the significance of heritage assets and support the effective management of the historic environment.

Table 10.1: Summary of identified effects of the Plan of cultural heritage

Identified effects on cultural heritage	Mitigating Local Plan policies	Summary of residual effect
1  Alter the character and/or setting of designated heritage assets New development has potential to adversely affect heritage assets. This will depend on contextual factors relating to the nature and location of development and factors that contribute to the significance of heritage assets, including its setting. Heritage assets in proximity to site allocations comprise listed buildings, scheduled monuments, and Registered Parks and Gardens.	• CP9 (Historic Environment) ensures that planning applications will protect, conserve and enhance designated heritage assets particularly their character, fabric and setting. • WO3 (Blenheim Palace WHS) sets out the requirements to protect, conserve and enhance the cultural significance and the Outstanding Universal Value (OUV) of the WHS and its setting, and support the WHS Management Plan including consideration to long-distance views. • Policies BAI, BUI, CHI, LHI and WOI ensure that the historic character of the towns in which they support, including any listed buildings, are conserved and enhanced. • Policies CA4 (Land west of Carterton) and CN1 (Land East of Chipping Norton) require development proposals to be informed by appropriate heritage assessments, including nearby listed buildings. If development is located within proximity, the design and layout should conserve and enhance the significance of the heritage asset.	Adverse impacts on the character and setting of designated heritage assets including LBs and their settings are anticipated to be mitigated through various Plan policies. A range of plans, programmes and legislation including the NPPF, as well as local guidance also affords protection to heritage assets in line with their significance. The Local Plan will be expected to help avoid or mitigate the potential for significant impacts on designated heritage assets arising from proposed development, with a negligible effect identified overall.

Identified effects on cultural heritage	Mitigating Local Plan policies	Summary of residual effect
	Supporting information and masterplans for several reasonable alternative strategic sites indicate that sensitive design and layout would be pursued, informed by heritage assessments, to avoid or minimise harm to nearby LBs.	
2  Alteration of West Oxfordshire's historic character, including the character and/or setting of Conservation Areas Development within or in proximity to a CA has the potential to adversely impact the character and special architectural or historic interest of the CA and/or its setting.	- RA3 (Land at Kingham Station) requires development to conserve and the importance and setting of nearby conservation areas in Kingham and Bledington. Development proposals should be informed by a heritage assessment. - CP9 (Historic Environment) will ensure the character and/or appearance of the district's CAs and their settings, considering the contribution of their surroundings to their historical and visual significance, are conserved and/or enhanced. WODC will prepare update and adapt CA appraisals and management plans, prioritising those areas at greatest risk from development pressures or where the CA is most sensitive to change. - SP3 (Key Principles for New Development) highlights that design should respond innovatively and sensitively to historic distinctiveness including CAs. - DM31 (Digital Infrastructure and Connectivity) requires new mobile digital infrastructure to be designed and located with minimal visual intrusion, particularly in sensitive locations including conservation areas.	Whilst adverse impacts on the character and setting of CAs are anticipated to be partially mitigated through various Local Plan policies, the density of heritage assets and areas of historic significance within West Oxfordshire is likely to detract from the historic character of the borough in some locations. Alterations to the historic character of West Oxfordshire is likely to be long-term, permanent and localised residual effect.

11 Human health

11.1 Baseline

11.1.1 National and local health strategies and policies seek to promote the development of healthy communities, such as through delivering age-friendly environments for the elderly, encouraging healthier food choices and facilitating active travel. In line with the NPPF, LPAs should seek to promote social interaction, create communities which are safe and accessible, and ensure there is good accessibility to a range of GI, sports facilities, local shops, cultural buildings and outdoor spaces.

11.1.2 Key PPPs include Public Health England's Strategy for 2020 – 2025⁸⁵ which sets out priorities within the health system including a focus on addressing health inequalities. The Oxfordshire 2022/23 Director of Public Health Annual Report⁸⁶ focuses on issues of obesity and physical activity. Although Oxfordshire overall is one of the least deprived counties, the report also addresses issues of inequality that are highlighted through issues surrounding healthy lifestyles.

Healthcare facilities

11.1.3 In order to facilitate healthy and active lifestyles for local residents, WODC should seek to ensure that residents have good access to healthcare facilities.

11.1.4 There are no NHS hospitals providing an Accident and Emergency (A&E) service within West Oxfordshire, with the nearest being the John Radcliffe Hospital approximately 10km east of the district boundary, Horton General Hospital approximately 9km north of the district boundary and the Great Western Hospital approximately 17km south of the district boundary.

11.1.5 According to data provided by WODC, the district includes 13 GP surgeries. There are also two community hospitals providing rehabilitation and palliative care (Witney Community Hospital) and outpatient and maternity services (Chipping Norton War Memorial Community Hospital).

Leisure facilities

11.1.6 The provision of affordable and accessible leisure facilities is important to encourage an active and healthy local population. The West Oxfordshire district has eight public leisure facilities. These include 'Chipping Norton Leisure Centre' which is located in the north of the district and 'Woodstock Open Air Pool' which is located in the east of the district. Additionally, facilities relating to 'Bartholomew Sports Centre', 'Carterton Leisure Centre' and 'Windrush Leisure Centre' are located in the south of the district.

⁸⁵ Public Health England (2019) PHE Strategy 2020 to 2025. Available at: <https://www.gov.uk/government/publications/phe-strategy-2020-to-2025> [Date accessed: 17/04/26]

⁸⁶ Oxfordshire County Council (2023) 2022/23 Director of Public Health Annual Report. Available at: https://www.oxfordshire.gov.uk/sites/default/files/file/public-health/public_health_annual_report_2022_23.pdf [Date accessed: 17/04/26]

Greenspace

- 11.1.7 Opportunities to experience a diverse range of natural habitats and recreational spaces is known to be beneficial for physical and mental health and wellbeing⁸⁷. Good access to such areas can reduce stress, fatigue, anxiety and depression⁸⁸, and has been linked with healthy foetal growth in pregnant women, higher birth weights, healthy microbiomes in babies and reduced rates of obesity and type 2 diabetes. Impacts of restricted access to the natural environment are particularly significant for lower socio-economic groups.
- 11.1.8 Providing residents with sustainable access to a diverse range of natural habitats can be an effective means of reducing health inequalities in the area.
- 11.1.9 The Open Space Assessment 2013 - 2029⁸⁹ identified a total of 381 sites currently providing greenspace in West Oxfordshire. This includes:
- Allotments;
 - Amenity Greenspace;
 - Parks and recreation grounds;
 - Accessible and private natural greenspace; and
 - Provision for children and young people.
- 11.1.10 The West Oxfordshire Open Space Study (2013)⁹⁰ and Playing Pitch Strategy (2022)⁹¹ provide guidance for development proposals which have potential to impact open space and playing pitch designations. Each study considers key factors relating to access, design, safety and community, in order to maximise support for recreational demand. WODC should seek to ensure that new and existing residents have access to a range of open spaces.

Box 11.1: Summary of key sustainability issues: human health

Key issues for human health include:

- ⇒ The increasing population in West Oxfordshire, and especially the ageing population, will be likely to place pressure on the capacity of health infrastructure and leisure facilities, which will need careful planning. It is important that the infrastructure that supports these facilities is kept up to date in order to provide optimal use.
- ⇒ Long travel distances to hospitals with an A&E department make it more difficult for residents to access emergency healthcare.
- ⇒ Sustainable access to GP surgeries and leisure facilities is more limited in the smaller rural settlements.
- ⇒ Through the West Oxfordshire Local Plan, the Council should seek to reduce health inequalities where possible and explore the possibility of delivering new and improved infrastructure, facilities and services.
- ⇒ Development within the West Oxfordshire Local Plan should ensure access to healthy eating options and fresh food stores, promoting healthy lifestyles to combat adult and childhood obesity.

⁸⁷ NHS England (no date) Green social prescribing. Available at: <https://www.england.nhs.uk/personalisedcare/social-prescribing/green-social-prescribing/> [Date accessed: 17/04/26]

⁸⁸ Houlden. V., Weich. S. and Jarvis. S. (2017) A cross-sectional analysis of green space prevalence and mental wellbeing in England

⁸⁹ West Oxfordshire District Council (2013). West Oxfordshire Open Space Study. Available at: <https://www.westoxon.gov.uk/media/g2eom11w/west-oxfordshire-open-space-study-2013.pdf> [Date accessed: 17/04/26]

⁹⁰ West Oxfordshire District Council (2013) West Oxfordshire Open Space Study. Available at: <https://www.westoxon.gov.uk/media/g2eom11w/west-oxfordshire-open-space-study-2013.pdf> [Date accessed: 15/04/26]

⁹¹ Knight, Kavanagh & Page Ltd. (2022) West Oxfordshire Playing Pitch Strategy & Action Plan. Available at: <https://www.westoxon.gov.uk/media/va0jpoje/west-oxfordshire-playing-pitch-strategy-and-action-plan-2022.pdf>. [Date accessed: 02/04/24]

⇒ Increasing levels of demand for recreation in combination with population growth increase the demand for local and accessible open space facilities, particularly within larger settlements.

11.2 Evaluating the effect of the Local Plan on human health

11.2.1 Human health has been primarily addressed in the SA process under SA Objective 10: Health and Wellbeing, which seeks to safeguard and improve health and wellbeing and reduce inequalities, although health issues overlap with several other aspects of the SA Framework.

Table 11.1: Summary of identified effects of the Plan on human health

Identified effects on human health	Mitigating Local Plan policies	Summary of residual effect
1  Sustainable access to healthcare / leisure facilities There is potential for negative effects relating to sustainable access to healthcare and leisure facilities, where some allocated sites are located beyond the recommended sustainable travel distances to key services, including hospitals with A&E services, GP surgeries and leisure facilities. This could increase reliance on private vehicles and reduce accessibility to essential services for future residents.	- CP4 (Delivering Infrastructure in-step with New Development) ensures that all new development proposals must be supported by effective investment in new or enhanced infrastructure to meet the needs arising from development, including healthcare. - CP7 (Healthy Place Shaping) ensures that all development proposals support access to new and enhanced healthcare and essential services. - WO1 (Strategic Development Framework for the Woodstock Area) sets out the delivery of a new GP facility. - DM15 (Protection and Provision of Community Facilities and Services) will ensure that existing services, including healthcare facilities, are safeguarded and improved in accessible locations. - DM16 (Active and Healthy Travel) will ensure that new development prioritises creating safe and sustainable access to services including healthcare facilities. - DM7 (Sport, Recreation and Play) – ensures that existing open spaces, playing pitches, sports, recreation, and play facilities will be safeguarded and that new/expanded facilities are provided in accordance with national and local standards to address identified needs, within the same catchment or settlement area. - DM14 (Town Centres) supports new leisure and community uses in town centres. - Various transport-focused policies including CP8 (Sustainable and Integrated Transport) and DM16 (Active and Healthy Travel) will improve sustainable access to services.	Local Plan policies will help to prevent the loss of existing healthcare facilities and improve sustainable access to facilities for some residents; however, the policies will not be expected to fully mitigate the restricted access to healthcare services for sites in more isolated rural settlements. Limited sustainable access to healthcare facilities is expected to be a medium-term and temporary significant adverse effect.

Identified effects on human health	Mitigating Local Plan policies	Summary of residual effect
2  Exposure to air / noise pollution (from AQMAs and main roads) The long-term health of residents, in particular vulnerable groups including children and the elderly, could be adversely affected by air pollution. Development within, or within 200m of, one of West Oxfordshire's two AQMAs or the main road network could potentially expose site end users to increased levels of traffic related air pollution or noise, with adverse implications for health (see also Chapter 7: Air).	- CP6 (Design Excellence and Placemaking) requires development to make provisions for sustainable transport, active travel and electric vehicle infrastructure. - CP8 (Sustainable and Integrated Transport) ensures that new developments are designed to facilitate high-quality public transport access and integration of multi-modes of travel, thereby contributing to lower transport-associated emissions. The policy will ensure that transport infrastructure is designed to minimise environmental impacts, including noise and air pollution. - DM1 (Green Infrastructure) promotes the protection, enhancement, and expansion of West Oxfordshire's GI network, with likely multi-functional benefits including for filtration of pollutants and improving air quality. - DM13 (Air Quality and Pollution) sets out measures to protect air quality and public health and ensures that development proposals leading to a deterioration in air quality, particularly near sensitive areas like AQMAs and the Oxford Meadows SAC, will be subject to scrutiny and mitigation requirements.	Several Local Plan policies are expected to reduce the likelihood and extent of adverse impacts on health regarding air pollution. However, as a result of the proposed development in the Plan, the likely associated increases in traffic flows and reduction in air quality, including within AQMAs, will be expected to have residual adverse effects which cannot be fully mitigated through the Local Plan policies. Adverse effects on health as a result of poor air quality across West Oxfordshire is expected to be a long-term significant effect, although the extent of this impact may reduce over time as clean technologies improve.
3  Limited access to / net loss of public greenspace A number of allocated sites are located outside the sustainable target distance to areas of greenspace, potentially limiting sustainable access to greenspace for site end users.	- CP7 (Healthy Place Shaping) encourages the incorporation of natural green spaces and well-connected places that promote active travel such as PRoW to enhance health and wellbeing. - DM1 (Green Infrastructure) sets out requirements for strategic sites to provide communal open spaces, parks, green corridors and other multi-functional GI. - DM5 (Efficient Use of Land for Development) expects proposed development to ensure high-density sites to provide high quality open space. - DM28 (Supporting the Rural Economy) will ensure development has no significant adverse impacts on PRoW, and that opportunities are sought to enhance footpaths.	The policies will be expected to ensure that development proposals do not result in a net loss of public greenspace. Further positive impacts on access to greenspace could be achieved in the longer term, through the provision of on-site or off-site GI and recreational resources.

Identified effects on human health	Mitigating Local Plan policies	Summary of residual effect
4  Limited access to PRow or cycle network The majority of allocated sites are located in areas with good coverage by the Public Right of Way (PRow) and/or cycle networks, providing many site end users with opportunities for active travel and recreation in the countryside, although provision at some sites may be partially limited.	- DM16 (Active and Healthy Travel) will ensure existing active travel routes, including PRow, footpaths, bridleways, and cycle paths will be protected and safeguarded from development that would cause harm to their connectivity, accessibility or character. - CP8 (Sustainable and Integrated Transport) ensures that new developments are designed to facilitate sustainable and active transport access.	The majority of allocated sites are located adjacent to existing pedestrian routes and/or cycle paths. Various policies seek to create permeable neighbourhoods and promote cycling and walking which would be likely to improve the coverage of, and accessibility to, the pedestrian and cycle networks across West Oxfordshire. An overall positive effect would be likely with regard to pedestrian and cycle access.

12 Landscape

12.1 Baseline

- 12.1.1 At the European, national, regional, and local levels emphasis is placed on the protection of landscape as an essential component of people's surroundings and sense of place. Landscape is described as comprising natural, cultural, social, aesthetic, and perceptual elements. This includes flora, fauna, soils, land use, settlement, sight, smells, and sound⁹².
- 12.1.2 Various PPPs seek to increase recognition of the relationships between the different aspects of landscapes including but not limited to local distinctiveness, the historic environment, natural resources, farming and forestry, education, leisure and recreation, transport and infrastructure, and nature conservation.
- 12.1.3 National Design Guidance⁹³ advocates well-designed places that are functional, attractive and provide a sense of safety, inclusion, and community cohesion. Landscape also links closely with GI, with well-managed GI networks providing multi-functional benefits including improving the health of people and wildlife.

Cotswolds National Landscape

- 12.1.4 The Cotswolds National Landscape (CNL), formerly known as Area of Outstanding Natural Beauty (AONB), encompasses a large portion of the northern west of the district (see **Figure 2.1**). The Cotswolds is the largest National Landscape in England and is recognised by its rich, diverse and high-quality landscape encompassing flower-rich limestone grasslands and ancient broadleaved woodland⁹⁴. The area is famed for the beauty of its limestone buildings with its central feature comprising the Cotswold Hills which rise from the broad, green meadows of the upper Thames. The Plan will need to seek to improve the CNL by considering its conservation and enhancement, such as through its capacity for BNG provision.

Landscape character

- 12.1.5 Natural England has divided England into 159 National Character Areas (NCAs), defined by a unique combination of landscape, biodiversity, geodiversity, history and cultural features as well as economic activity. The majority of West Oxfordshire is situated within the Cotswolds National Character Area (NCA), and the southern third of the district lies within the Upper Thames Clay Vales NCA. Key characteristics of the Cotswolds NCA include rolling chalk and limestone hills providing expansive views over various major settlements and scattered hamlets⁹⁵. The Upper Thames Clay Vales NCA shifts towards gently undulating lowland farmland, including claylands with wet valleys, mixed farming and open, arable lands⁹⁶.

⁹² Natural England (2014) An Approach to Landscape Character Assessment. Available at: <https://www.gov.uk/government/publications/landscape-character-assessments-identify-and-describe-landscape-types> [Date accessed: 17/04/26]

⁹³ MHCLG (2021) National Design Guide: Planning practice guidance for beautiful, enduring and successful places. Available at: <https://www.gov.uk/government/publications/national-design-guide> [Date accessed: 17/04/26]

⁹⁴ Cotswolds National Landscape (2026) Special qualities of the Cotswolds – A National Treasure. Available at: <https://www.cotswolds-nl.org.uk/our-landscape-2/> [Date accessed: 17/04/26]

⁹⁵ Natural England (2015) NCA Profile: 107 Cotswolds (NE420). Available at: <https://publications.naturalengland.org.uk/publication/5900626> [Date accessed: 17/04/26]

⁹⁶ Natural England (2014) NCA Profile: 108 Upper Thames Clay Vales (NE570). Available at: <https://publications.naturalengland.org.uk/publication/5865554770395136> [Date accessed: 17/04/26]

- 12.1.6 Four distinct architectural character areas have been identified in the West Oxfordshire Design Guide SPD⁹⁷: the Thames Vale; the Limestone Wolds; the Ironstone Valleys and Ridges; and the Northern Valleys and Ridges.
- 12.1.7 Baseline data on landscape character within the Plan area is established within the West Oxfordshire Landscape Assessment (1998)⁹⁸, which identified 13 Character Areas and 24 Landscape Types, with guidelines for each. More recent assessments for Witney (2007), Chipping Norton (2009) and Carterton (2009)⁹⁹ provide further context regarding the landscape character and sensitivity around the main towns, alongside Landscape and Visual Reviews¹⁰⁰ undertaken to inform site options through the adopted local plan process. These studies also provide further insight into the sensitivity and capacity of land parcels, the majority of which were identified to have high landscape value and sensitivity to new development, requiring careful consideration throughout the Local Plan process.
- 12.1.8 Three special landscape policy areas were identified in the adopted Local Plan process¹⁰¹. These comprise the Lower Windrush Valley Project Area, Wychwood Project Area and Windrush in Witney Project Area. These are identified for special landscape protection, conservation and management.
- 12.1.9 WODC should seek to review and update landscape evidence to ensure that the emerging Local Plan does not undermine West Oxfordshire's distinctive characteristics and unspoilt countryside, whilst promoting regeneration and enhancements to townscapes within the urban area.

Public Rights of Way

- 12.1.10 The Thames Path is a National Trail which runs along the River Thames and the southern boundary of the West Oxfordshire District. Potential cross-boundary effects will need to be carefully considered, where the district borders South Oxfordshire and the Vale of the White Horse. There is an extensive Public Rights of Way (PRoW) network within the semi-rural areas of West Oxfordshire, although this is more fragmented within the urban and the most rural areas (see **Figure 12.1**).

⁹⁷ West Oxfordshire District Council (2016) West Oxfordshire Design Guide. Available at: <https://www.westoxon.gov.uk/planning-and-building/planning-policy/supplementary-planning-documents/> [Date accessed: 17/04/26]

⁹⁸ Atlantic Consultants (1998) West Oxfordshire Landscape Assessment. Available at: <https://www.westoxon.gov.uk/media/cpgn2f0/west-oxfordshire-landscape-assessment-1998.pdf> [Date accessed: 17/04/26]

⁹⁹ Amanda Hopwood Landscape Consultancy (2007, 2009, 2009) Witney Landscape Assessment; Chipping Norton Landscape Assessment; and Carterton Landscape Assessment. Each available at: <https://www.westoxon.gov.uk/planning-and-building/planning-policy/local-plan-2031/local-plan-evidence-base/> [Date accessed: 17/04/26]

¹⁰⁰ Kirkham Landscape Planning (2012, 2014, 2015) Landscape and Visual Review of Submissions for Carterton and Witney Strategic Development Options; Landscape and Visual Review of Chipping Norton Strategic Site Option; and Landscape and Visual Review of Two Additional Submissions for Witney Strategic Development Options. Each available at: <https://www.westoxon.gov.uk/planning-and-building/planning-policy/local-plan-2031/local-plan-evidence-base/> [Date accessed: 17/04/26]

¹⁰¹ West Oxfordshire District Council (2018) West Oxfordshire Local Plan 2031. Available at: <https://www.westoxon.gov.uk/planning-and-building/planning-policy/local-plan-2031/> [Date accessed: 17/04/26]

Green Belt

- 12.1.11 West Oxfordshire contains a small portion of the Oxford Green Belt in the east of the district (as shown in **Figure 2.1**). The Oxford Green Belt prevents urban sprawl from Oxford and aims to avoid coalescence with nearby settlements such as Eynsham, Cassington and Bladon¹⁰². Whilst Green Belt is not a statutory landscape designation, it is important to recognise the role that the Oxford Green Belt plays in preserving the setting, character and openness of the countryside.

¹⁰² LUC (2015) Oxford Green Belt Study 2015. Available at: <https://www.cherwell.gov.uk/downloads/download/312/oxford-green-belt-study-october-2015> [Date accessed: 23/04/26]

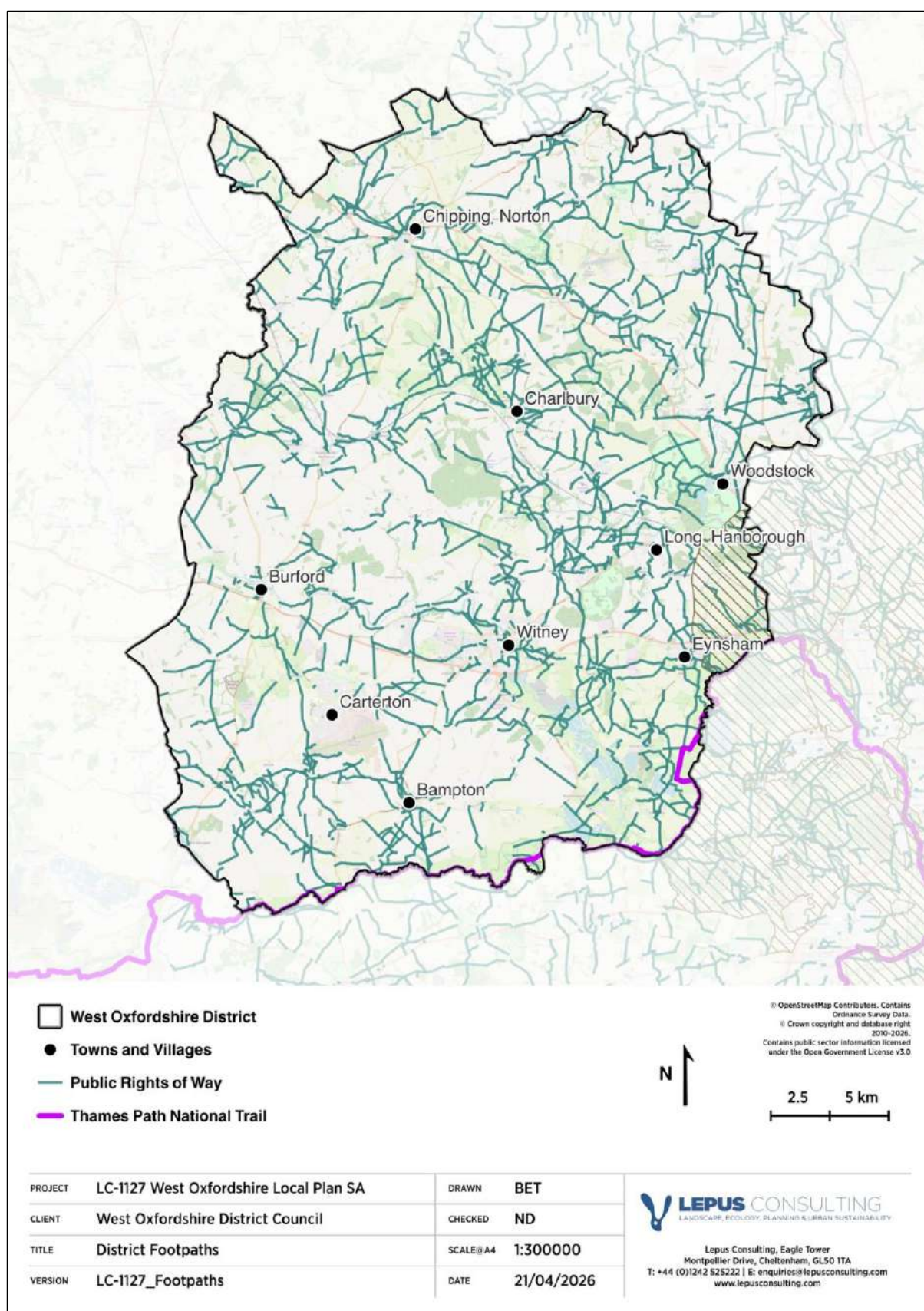


Figure 12.1: Public Rights of Way and National Trails in West Oxfordshire

Box 12.1: Summary of key sustainability issues: landscape

Key issues for landscape include:

- ⇒ New development within or in proximity to the Cotswolds National Landscape, which covers a large proportion of the Plan area, may lead to adverse effects on the setting or special qualities of the designated landscape without careful planning and design.
- ⇒ The increased need for development could increase the risk of urban sprawl from market towns and smaller settlements, as well as the risk of coalescence between settlements.
- ⇒ Development could impact the open landscape, alter the character or impose on the tranquility that gives a sense of place to the extensive number of rural settlements.
- ⇒ Previous landscape assessments determined the landscapes within West Oxfordshire to be of high sensitivity, with low capacity for new development. WODC should carefully consider the findings of existing landscape assessments and commission new evidence to ensure that development has regard to the setting and form of the existing settlements and landscape in order to avoid or minimise harm.
- ⇒ Development should have regard to the key issues and guidelines identified within the published Landscape Assessment and any emerging landscape guidance.

12.2 Evaluating the effect of the Local Plan on landscape

- 12.2.1 Landscape has been primarily considered in the SA process under SA Objective 4: Landscape, which seeks to conserve, enhance and manage the quality and character of West Oxfordshire's landscapes and townscapes.

Table 12.1: Summary of identified effects on the Local Plan on landscape

Identified effects on landscape	Mitigating Local Plan policies	Summary of residual effect
1  Threats or pressures to the Cotswolds National Landscape and country parks A number of allocated sites lie in close proximity to the Cotswolds National Landscape where development could result in adverse impacts on views or the setting of the designated landscape. Although Country Parks (CP) are not nationally designated landscapes in themselves, development at these some sites could result in adverse effects on views and the setting of the nearby CPs, and may also have implications for the setting of the NL in some locations.	• SP2 (Spatial Strategy) highlights that great weight is given to landscape and scenic beauty, and a limit on the scale and extent of development considered within the CNL. • CP6 (Design Excellence and Placemaking) will ensure that development protects and enhances natural beauty, integrating landscaping that preserves the local character and important views, such as in the CNL. • SP4 (Cotswolds National Landscape) will ensure development within the CNL protects its beauty, heritage and tranquillity and aligns with policies in the CNL Management Plan. Major development will be resisted in the CNL unless exceptional circumstances are evidenced. • DM3 (Conserving and Enhancing the Landscape Character through New Development) requires the design of development proposals to integrate with the surrounding landscape and reflect the landscape and heritage character,	Various Local Plan policies seek to protect nationally designated landscapes. A range of plans, programmes and legislation including the NPPF, affords protection to NLs in line with their significance. The Plan will be expected to help avoid or mitigate the potential for significant effects on the CNL arising from proposed development. In the absence of a plan-wide landscape sensitivity or capacity assessment, it is necessary to adopt a precautionary approach and consider the potential for adverse impacts on the NL.

Identified effects on landscape	Mitigating Local Plan policies	Summary of residual effect
	This includes evaluating the impact of the proposed development on the local landscape character, scenic views, and any valued landscapes in the CNL. Supporting information and masterplans for several reasonable alternative strategic sites (including CHAR005) indicate that high quality landscaped open spaces and corridors will be incorporated into the site layout to maintain views and minimise harm to the CNL.	
2  Alteration of landscape character and sensitive / locally distinctive landscapes A number of site allocations are anticipated to have adverse effects on the distinctive characteristics of the landscape as identified in the West Oxfordshire Landscape Assessment (1998)¹⁰³. According to data from the Witney (2007), Chipping Norton (2009) and Carterton (2009)¹⁰⁴ Landscape Sensitivity Assessments, a number of allocated sites are located in areas of high to medium sensitivity. The landscape character in these areas is susceptible to change as a result of the proposed development.	- CP6 (Design Excellence and Placemaking) requires all development proposals to deliver high-quality, sustainable design that enhances the district's character, in line with national and local design guidance. - WIT3 (Conservation and Management of the Windrush Valley) will ensure that development in this area conserves and enhances the unique landscape character including heritage features and GI. - SP3 (Key Principles for New Development) requires development to respond sensitively to the local character and distinctiveness, ensuring it is appropriate to the existing scale, character and form of its location. Proposals must consider the potential cumulative impacts of development on the local landscape. - DM3 (Conserving and Enhancing the Landscape Character through New Development) requires development proposals to be informed by an understanding of the surrounding landscape, including its character, key features, and sensitivity.	Due to the scale of development proposed, with a large proportion in previously undeveloped locations, these policies are not expected to fully mitigate the potential impacts on landscape character and a residual adverse effect is anticipated. Alteration of the landscape character is a long-term and permanent significant adverse effect. There is potential for a cumulative adverse effect on landscape character resulting from the development proposed in the Plan.
3 	DM3 (Conserving and Enhancing the Landscape Character through New Development) requires that development	Whilst the Local Plan policies provide some proportionate protection of visual amenity and views, it

¹⁰³ Atlantic Consultants (1998) West Oxfordshire Landscape Assessment. Available at: <https://www.westoxon.gov.uk/media/cpgn2fj0/west-oxfordshire-landscape-assessment-1998.pdf> [Date accessed: 17/04/26]

¹⁰⁴ Amanda Hopwood Landscape Consultancy (2007, 2009, 2009) Witney Landscape Assessment; Chipping Norton Landscape Assessment; and Carterton Landscape Assessment. Each available at: <https://www.westoxon.gov.uk/planning-and-building/planning-policy/local-plan-2031/local-plan-evidence-base/> [Date accessed: 17/04/26]

Identified effects on landscape	Mitigating Local Plan policies	Summary of residual effect
Changes in views experienced by local residents and users of the PRoW network The development proposed in the Plan has the potential to adversely affect informal high-quality viewing experiences that can be gained from the local PRoW network (including the Thames Path National Trail). Development proposed at the majority of sites has the potential to adversely affect views from nearby existing properties, for example through introduction of built form into current areas of open space or low-lying land.	proposals assess and respect key views and skylines, ensuring that new buildings and landscape changes do not dominate or disrupt important local or long-range views. DM16 (Active and Healthy Travel) will ensure existing PRoW, footpaths and bridleways will be protected and safeguarded from development that would cause harm to their connectivity, setting, accessibility or character.	is likely a residual impact will remain overall due to the large proportion of development in the Plan proposed on previously undeveloped sites and the location of a number of allocated sites with regard to the PRoW and existing properties. There is anticipated to be a cumulative adverse residual impact in relation to alteration of views. Alteration of views is likely to be a long-term and permanent minor adverse effect.
4  Increased coalescence between settlements The proposed development at some of the allocated sites has potential to reduce the separation between settlements and therefore increase the risk of coalescence and loss of identity of these settlements.	- SP3 (Key Principles for New Development) requires development proposals to demonstrate how they will protect the separate identity of settlements by maintaining appropriate physical and visual gaps between them. - DM3 (Conserving and Enhancing the Landscape Character through New Development) seeks to ensure that development respects and reflects local identity and distinctiveness. - DM10 (Renewables and Low Carbon Energy Development) supports renewable energy development that avoids settlement coalescence. - Various settlement policies, including WT1, CN1 and LH1 seek to maintain the individual character of their associated towns and avoid coalescence between settlements.	Various policies seek to minimise impacts on the countryside and maintain separation between settlements through protection of the Green Belt and open countryside. However, due to the rural context within which some of the new development is situated, the Local Plan policies will not be expected to fully mitigate these impacts and a residual adverse effect is anticipated. An increased risk of urbanisation of the countryside and coalescence is a long-term and permanent significant adverse effect.

13 Population and material assets

13.1 Baseline

- 13.1.1 'Population' is a broad matter and includes consideration of pollution and waste, housing, transport and accessibility, education, economy and employment. The population topic seeks to create places where residents live a high quality of life for longer, are well educated and have the necessary skills to gain employment and succeed in modern society. Indicators of these objectives include the proximity of development proposals to schools, accessibility to employment land and proximity to services and amenities.
- 13.1.2 PPPs on population cover a range of different objectives, including tackling social exclusion and inequalities, improving health, improving housing quality, and reducing levels of education failure, ill health, substance misuse, crime and anti-social behaviour. At the regional and local levels, addressing issues regarding housing affordability and tackling small pockets of rural deprivation are key aims.
- 13.1.3 'Material assets' covers a variety of built and natural assets which are accounted for in a range of topics. It is a requirement of Schedule 2 of the SEA Regulations to consider material assets, although the Regulations do not define them. The SA process considers material assets as the social, physical and environmental infrastructure implications of the Local Plan.
- 13.1.4 The material assets sustainability theme covers a range of policy areas, including waste management, minerals, energy production and previously developed land. PPPs seek to protect minerals resources and promote appropriate after uses for mineral workings and promote the 'waste hierarchy'.

Population and identity

- 13.1.5 According to the 2021 Census, the district has a resident population of 114,200 people, which has increased by around 9,500 since the previous census in 2011¹⁰⁵. The district has an ageing population with 21.6% people being 65 years or older, which is higher than the UK average of 18.6%.
- 13.1.6 The majority (95.2%) of West Oxfordshire's residents describe themselves as 'white', with much smaller proportions identifying as 'mixed' (1.9%), 'Asian' (1.7%), 'black' (0.6%), or 'other ethnic groups' (0.6%)¹⁰⁶.
- 13.1.7 Most residents living in West Oxfordshire were born in England (85.4%), with 1.8% born in Scotland and 1.7% in Wales¹⁰⁷. Additionally, 1.0% of the population reported Poland as their country of birth.

¹⁰⁵ ONS (2022) Population and household estimates, England and Wales: Census 2021. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/populationandhouseholdestimatesenglandandwales/census2021#population-sizes-and-changes-for-regions-and-local-authorities> [Date accessed: 17/04/26]

¹⁰⁶ ONS (2023) How life has changed in West Oxfordshire: Census 2021. Available at: <https://www.ons.gov.uk/visualisations/censusareachanges/E07000181/> [Date accessed: 17/04/26]

¹⁰⁷ Ibid.

- 13.1.8 Between the 2011 and 2021 census, there was a large increase in those identifying as having 'no religion', from 25.9% to 40.6%¹⁰⁸. Approximately half of people described themselves as 'Christian' in 2021, with other religions each making up less than 1% of the population.

Housing

- 13.1.9 Government guidance requires LPAs to determine the local housing need figure for their area. The deliverability of this figure should then be tested in the local plan process. The local housing need figure is calculated by summing the national standard method figure, using 2014-based ONS household projections and affordability ratios which are updated annually.
- 13.1.10 It was previously estimated that West Oxfordshire required 570 homes per year, and this housing requirement was exceeded during the period 2018–2021. A new Local Housing Needs Assessment¹⁰⁹, published in June 2025, has since been prepared to inform the emerging Local Plan and identifies a local housing need of 905 dwellings per annum for the period 2025–2041, based on the Government's updated standard method.
- 13.1.11 High housing costs cause hardship for many local people. The average house price in West Oxfordshire in 2025 was £400,000, while the median house price was £300,000 across the UK¹¹⁰. Full-time employees in England spent an average of 7.6 times their annual earnings on buying a home in 2025, whereas in West Oxfordshire, the affordability ratio was 11.4¹¹¹. As a result of pressure on housing costs, there was an identified need for 391 affordable homes per year for the Local Plan 2031¹¹².
- 13.1.12 In order to meet housing needs for all, the Preventing Homelessness Strategy 2025 – 2028¹¹³ anticipated that early intervention, targeted support and an expansion of accommodation options were key catalysts for reducing homelessness and housing inequality in the district.

Deprivation and crime

- 13.1.13 The Index of Multiple Deprivation (IMD) measures the relative levels of deprivation in 33,755 Lower Super Output Areas (LSOAs) in England¹¹⁴. Of the 296 LPAs in England, West Oxfordshire is ranked as the 270th on average, making it one of the least deprived. However, small pockets of deprivation remain in rural areas such as to the east of Witney, and within larger towns such as Witney and Chipping Norton.

¹⁰⁸ Ibid.

¹⁰⁹ West Oxfordshire District Council (2025) Local Housing Needs Assessment. Available at: <https://westoxon.gov.uk/media/i4mjvxea/west-oxfordshire-local-housing-needs-assessment-june-2025.pdf> [Date accessed: 01/07/26]

¹¹⁰ West Oxfordshire District Council (2025) Preventing Homelessness Strategy 2025 - 2028. Available at: <https://www.westoxon.gov.uk/media/kvjni2si/wodc-preventing-homelessness-strategy-2025-28.pdf> [Date accessed: 17/04/26]

¹¹¹ UK Government (2023) Housing affordability in England and Wales: 2023. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingaffordabilityinenglandandwales/2025> [Date accessed: 17/04/26]

¹¹² West Oxfordshire District Council (2025) Local Housing Needs Assessment. Available at: <https://westoxon.gov.uk/media/i4mjvxea/west-oxfordshire-local-housing-needs-assessment-june-2025.pdf> [Date accessed: 01/07/26]

¹¹³ West Oxfordshire District Council (2025) Preventing Homelessness Strategy 2025 - 2028. Available at: <https://www.westoxon.gov.uk/media/kvjni2si/wodc-preventing-homelessness-strategy-2025-28.pdf> [Date accessed: 17/04/26]

¹¹⁴ MHCLG (2025) The English Indices of Deprivation 2025. Available at: <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2025/english-indices-of-deprivation-2025-statistical-release> [Date accessed: 17/04/26]

- 13.1.14 Crime rates are lower in West Oxfordshire than the average for England and Wales. As of the year ending September 2025, there was a crime rate of 50 per 1,000 population in West Oxfordshire, compared to 75 per 1,000 people for England and Wales¹¹⁵.

Economy

- 13.1.15 West Oxfordshire has a strong tourism industry due to its location in the Cotswolds, with popular attractions being Blenheim Palace, and market towns such as Witney and Burford. Its location provides functional economic links to Oxford City, Cherwell District and Vale of White Horse District. In addition, key areas for industry include the Oxford Science Park, RAF Brize Norton and Siemens and Abbot, as well as clusters of science, engineering and manufacturing businesses. However, a lack of large multinational businesses and large employment areas remains a barrier for employment options in the area, owing to the large number of out-commuters¹¹⁶. 2021 Census origin–destination data indicate that around 37.8% of employed residents commute outside West Oxfordshire for work, with Oxford representing the largest destination¹¹⁷.
- 13.1.16 In 2021, 1.8% of people aged 16 – 64 said they were unemployed, compared with 2.0% in 2011¹¹⁸. Of the 61.7% people in full time employment, the workforce is highly skilled with approximately one-quarter of people in professional occupations¹¹⁹.
- 13.1.17 West Oxfordshire has high job growth potential with the introduction of the Salt Cross Garden Village. It is anticipated that the construction and expansion of this employment area will see a significant increase in jobs throughout and extending beyond the period of its development, with a wide range of local jobs within easy commuting distance of new homes¹²⁰.
- 13.1.18 Improvements are being made for the provision of ultrafast full-fibre broadband in West Oxfordshire, particularly with an increasing number of people working from home¹²¹. This is likely to help improve digital connectivity for home workers and support local businesses through faster and more reliable connections.

Education

- 13.1.19 According to data provided by WODC, the district contains 51 primary schools and seven secondary schools. It is assumed that new residents in the Plan area will require access to primary and secondary education to help facilitate good levels of education, skills and qualifications of residents.

¹¹⁵ ONS (2025) Crime in England and Wales, year ending September 2025. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/bulletins/crimeinenglandandwales/yearendingseptember2025/relateddata> [Date accessed: 17/04/26]

¹¹⁶ ONS (2026) Internal Migration Map: Available at: <https://www.ons.gov.uk/visualisations/dvc638/maps/flow/> [Date accessed: 17/04/26]

¹¹⁷ Office for National Statistics, (2023); Origin-destination data, England and Wales: Census 2021. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/origindestinationdataenglandandwales/census2021> [Date accessed: 02/07/26]

¹¹⁸ ONS (2023) How life has changed in West Oxfordshire: Census 2021. Available at: <https://www.ons.gov.uk/visualisations/censusareachanges/E07000181/> [Date accessed: 17/04/26]

¹¹⁹ West Oxfordshire District Council (2021) Annual Monitoring Report 2020 - 2021. Available at: <https://www.westoxon.gov.uk/media/wgdcxefn/annual-monitoring-report-2020-2021.pdf> [Date accessed: 20/04/26]

¹²⁰ West Oxfordshire District Council (2026) Salt Cross Garden Village Area Action Plan (AAP). Available at: <https://www.westoxon.gov.uk/media/5kwjr10z/salt-cross-area-action-plan-february-2026.pdf> [Date accessed: 20/04/26]

¹²¹ West Oxfordshire District Council (2021) Annual Monitoring Report 2020 - 2021. Available at: <https://www.westoxon.gov.uk/media/wgdcxefn/annual-monitoring-report-2020-2021.pdf> [Date accessed: 20/04/26]

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- 13.1.20 Further education provision is limited in West Oxfordshire. The Witney Campus of Abingdon and Witney College provides sixth form and college courses to local residents. There are no universities within West Oxfordshire itself, however, the district is located within a commutable distance to Oxford University, Oxford Brookes University and the Royal Agricultural College.
- 13.1.21 Educational achievement is relatively high in West Oxfordshire. West Oxfordshire is in the 80th percentile of local authorities for average qualification rank¹²².

¹²² ONS (2023) Education, England and Wales: Census 2021. Highest level of qualification, usual residents aged 16 years and over: index score ranked and percentage distribution, 2021, local authorities in England and Wales. Available at: <https://www.ons.gov.uk/peoplepopulationandcommunity/educationandchildcare/bulletins/educationenglandandwales/census2021> [Date accessed: 20/04/26]

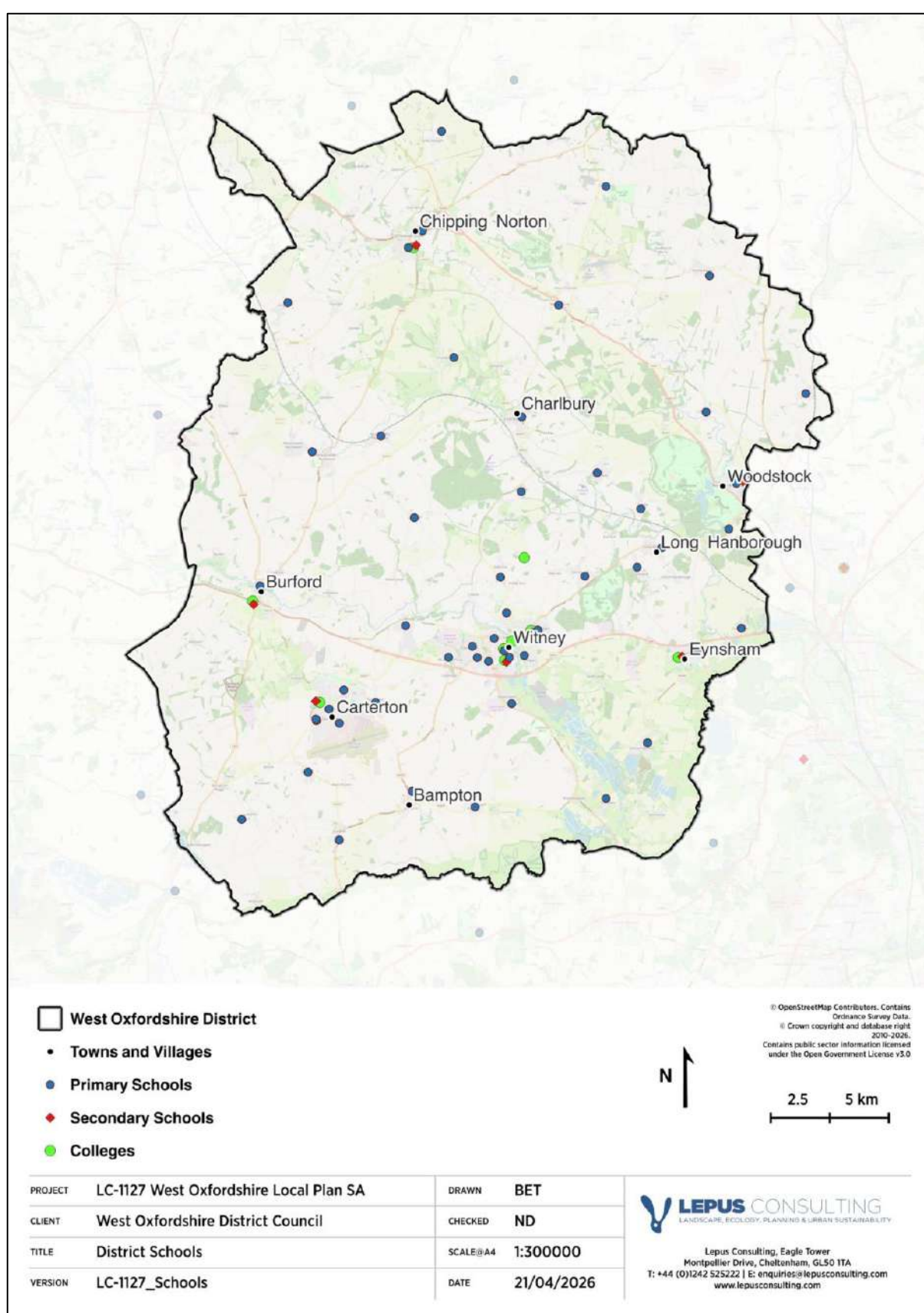


Figure 13.1: Schools and educational provision in West Oxfordshire

Local centres

- 13.1.22 Witney was defined as the principal town centre in the adopted local plan, alongside the primary town centres of Carterton and Chipping Norton. Burford and Woodstock are noted as town centres with a significant tourist role.
- 13.1.23 A range of services and facilities are provided within the towns including libraries, post offices, local shops and convenience stores. All main and rural service centres are supported by a number of smaller town, village and neighbourhood shopping centres. However, 14 parishes within the 33 'village' parishes were reported to have no shop in 2025¹²³.

Minerals and waste

- 13.1.24 The proposed development within the Plan area and associated increase in residents would be expected to result in a significant increase in waste produced. It is assumed that new residents will have an annual waste production in line with the national average, which was 376kg per person in 2024/2025¹²⁴.
- 13.1.25 The Oxfordshire Minerals and Waste Development Scheme (2025)¹²⁵ sets out the strategy to produce the new Oxfordshire Minerals and Waste Local Plan to update the previous Plan from 2017¹²⁶. This will involve safeguarding the current network of waste management facilities and providing new suitable and well-located new facilities to maximise opportunities to reuse, compost, recycle, and treat waste. Currently, the Ardley Energy Recovery Facility converts approximately 95% of Oxfordshire's residual waste into electricity¹²⁷.
- 13.1.26 The Oxfordshire Minerals and Waste Authority Monitoring Report (2020)¹²⁸ identifies a range of minerals worked or with potential for working in the county. Mineral resources are finite and must be protected to ensure future generations can meet their own needs. Sterilisation of mineral resources can occur as a result of surface development directly overlying the mineral resource, or by development that is situated on, or close to, the boundary of a resource. The Minerals and Waste Authority Monitoring Report identified impacts where development may hinder mineral conservation or extraction in any Mineral Safeguarding Areas, which are distributed across the district and primarily supply limestone and soft sand.

¹²³ WODC (2025) Settlement Sustainability report. Available at: <https://westoxon.gov.uk/media/terbtxo1/settlement-sustainability-report-october-2025.pdf> [Date accessed: 20/04/26]

¹²⁴ DEFRA (2026) Local authority collected waste management – annual results 2024/25. Available at: <https://www.gov.uk/government/statistics/local-authority-collected-waste-management-annual-results/local-authority-collected-waste-management-annual-results-202425> [Date accessed: 20/04/26]

¹²⁵ Oxfordshire County Council (2025) Oxfordshire Minerals and Waste Local Development Scheme. Available at: <https://www.oxfordshire.gov.uk/sites/default/files/file/planning-minerals-and-waste/MineralsandWasteDevelopmentScheme.pdf> [Date accessed: 20/04/26]

¹²⁶ Oxfordshire County Council (2017) Oxfordshire Minerals and Waste Plan. Available at: <https://www.oxfordshire.gov.uk/sites/default/files/file/planning-minerals-strategy-2017-and-2011/adoptedmineralswastecorestrategysept2017.pdf> [Date accessed: 20/04/26]

¹²⁷ Viridor (2026) Ardley ERF. Available at: <https://www.viridor.co.uk/energy/energy-recovery-facilities/ardley-erf/>. [Date accessed: 20/04/26]

¹²⁸ Oxfordshire County Council (2020) Oxfordshire Minerals and Waste Authority Monitoring Report (2020). Available at: <https://www.oxfordshire.gov.uk/sites/default/files/file/planning-minerals-and-waste/MineralsandWasteAMR2020.pdf> [Date accessed: 04/04/24]

Box 13.1: Summary of key sustainability issues: population and material assets

Key issues for population and material assets include:

- ⇒ West Oxfordshire has a high population of skilled workers, however a large number of skilled job opportunities require travel outside of the Plan area.
- ⇒ There is a need to continue improving digital connectivity in West Oxfordshire, particularly in rural areas, to help reduce the need to travel and provide residents with the ability to work, shop and access services from home.
- ⇒ The ageing population in West Oxfordshire is likely to place increased pressure on health and social care facilities over time, and may intensify issues with isolation and loneliness, in particular for elderly people living in more rural areas with poorer access to local services.
- ⇒ There is a need to increase the proportion of waste sent for reuse, recycling or composting and ensure that waste management facilities have enough capacity to adapt to population increases.
- ⇒ High housing costs increase housing inequalities and can make it difficult for first-time buyers or low-income families to move onto the property ladder. There is a high demand for affordable housing provision.
- ⇒ An increasing population puts greater demand on schools and further education provision in West Oxfordshire. There is a need to ensure there is sufficient capacity in schools and improve sustainable access to education.

13.2 Evaluating the effect of the Local Plan on population and material assets

- 13.2.1 As outlined in **section 13.1**, the population and material assets theme covers a range of topics which have been addressed through several SA Objectives including Objective 8 (Natural Resources and Waste), 9 (Housing and Equality), 10 (Health and Wellbeing), 11 (Transport and Accessibility), 12 (Education) and 13 (Economy and Employment).

Table 13.1: Summary of identified effects on the Plan on population and material assets

Identified effects on population and material assets	Mitigating Local Plan policies	Summary of residual effect
 1 Provision of new homes The Local Plan proposes the development of 18,318 (905 per annum) according to the latest Standard Method calculation.	- DM15 (Protection and Provision of Community Facilities and Services) supports the delivery of new or enhanced facilities where they address identified gaps in provision. - DM19 (Creating Mixed and Balanced Communities) requires new development to contribute towards a mixture of housing types, sizes and tenures for market and affordable homes that will be expected on each development site. - DM20 (Affordable Housing) supports the provision of affordable housing to buy or rent in order to meet West Oxfordshire's needs. - DM21 (Specialist Housing) supports the provision of specialist housing to ensure people in West Oxfordshire have the opportunity to access accommodation which	In order to meet the identified housing need, the Local Plan proposes to deliver 18,318 new dwellings. Policies in the Plan set out the requirements to provide an appropriate mix of housing types and tenures, seeking to meet the needs of different groups, including older people. A long-term positive effect on housing provision is anticipated.

Identified effects on population and material assets	Mitigating Local Plan policies	Summary of residual effect
	meets their needs, including affordable housing and housing of a range of types and tenures - DM22 (Custom and Self-build Housing) supports the delivery of custom and self-build housing in West Oxfordshire, with the aim of diversifying the housing market. Proposals considered to be major development are required to provide a proportion of plots for affordable self and custom-build houses. - DM23 (Community-Led Housing) promotes inclusive development and helps to empower local communities by giving them the opportunity to contribute to the local housing need, with a specific emphasis on affordable housing provision.	
2  Provision of employment opportunities The Local Plan proposes the development of sufficient employment land to meet the locally identified need of 29.5ha employment floorspace across the Plan period.	- DM34 (Provision and Protection of Land for Employment) – ensures that proposals involving the partial or complete loss of employment land or premises to non-employment uses will only be permitted where the proposal would provide significant wider public benefits which outweigh the loss of employment space. - CP5 (Supporting Economic Growth and Local Prosperity) ensures provision for the necessary employment land and floorspace to support economic growth, ensuring a diverse range of job opportunities. - RA1 (Rural Area Strategy) supports small scale employment development to support rural vitality, encourages small-scale rural enterprise, homeworking, and flexible business space, in addition to improved access to public and community transport, particularly to larger service centres. - DM21 (Previously Developed Land and Development Densities) ensures that higher density development will be supported in urban areas and locations with good access to public transport, key services and employment opportunities, particularly around transport hubs. - DM34 (Provision and Protection of Land for Employment) supports proposals for employment development where they align with the Council's economic vision and	The Local Plan provides sufficient land for a portfolio of employment sites that meet the needs of different types of businesses. A long-term positive effect on employment provision is anticipated.

Identified effects on population and material assets	Mitigating Local Plan policies	Summary of residual effect
	support other local, regional and national economic priorities. DM35 (Supporting the Rural Economy) ensures that small-scale employment development, including new businesses, will be supported within or adjacent to the built area of settlements.	
3  Sustainable access to, and pressure on, local services and facilities There is potential for negative effects relating to sustainable access to public transport, education and local services, where some allocated sites are located beyond the recommended sustainable travel distances. This could increase reliance on private vehicles and reduce access to public transport, schools and day-to-day facilities for future residents. Sustainable access to healthcare services is considered under Chapter 11: Human Health.	- RA1 (Rural Area Strategy) – provides support to rural communities by maintaining and enhancing local services. - CP9 (Healthy Place Shaping) – ensures that development supports health and well-being by providing new and enhanced healthcare and essential services. - DM21 (Previously Developed Land and Development Densities) – Ensures that higher-density development will be supported in urban areas and locations with good access to public transport. Key services and employment opportunities. - DM23 (Protection and Provision of Community Facilities and Services) will protect existing shops and community facilities and encourage delivery of new and enhanced facilities to address accessibility gaps. - Supporting information and masterplans for several reasonable alternative strategic sites indicate that public transport and active travel improvements would be provided alongside new development, to improve access to services and facilities.	The Local Plan policies are expected to improve access to local services and facilities for the majority of sites through providing improved transport networks, developer contributions to services and new service provision. Although access could remain limited within a number of rurally located sites, the implementation of Travel Plans is anticipated to help address this to some extent. On balance, a negligible effect is identified for access to local services, provided that effective Travel Plans and monitoring of their effectiveness is in place.
4  Waste generation The proposed development of 18,318 homes and a significant amount of new employment floorspace will be expected to increase waste generation and have a potential adverse effect on the capacity of waste management facilities in the Plan area.	DM12 (Waste and the Circular Economy) ensures that developers must design buildings and infrastructure with waste minimisation in mind, in accordance with the waste hierarchy. A Construction Waste Management Plan and Operational Waste Management Plan must be submitted with all planning applications for major development.	There is likely to be sufficient capacity for recycling, composting, and inert waste, but a landfill shortfall for non-inert waste over the Plan period. The construction and occupation of new homes and businesses could increase non-inert waste production. The cumulative impact of increased waste generation on the capacity of waste management facilities is likely to be a medium-term, but potentially

Identified effects on population and material assets	Mitigating Local Plan policies	Summary of residual effect
		temporary, significant adverse effect.
5  Sterilisation of mineral resources Where non-minerals development coincides with an identified MSA, there is potential for sterilisation of the mineral resource, meaning the minerals will be inaccessible for potential extraction in the future.	- CA6 (Land north of Brize Norton) requires proposed development to undertake a archaeological evaluation and mitigation if required, and development plans to address mineral safeguarding considerations including whether extraction is practicable, necessary and environmentally acceptable. - LH3 (Land west of Hanborough Station) requires development plans to address mineral safeguarding considerations, including whether extraction is practicable, necessary and environmentally acceptable. - Policy RA4 (Land at Downs, Standlake) development proposals must demonstrate how it meets the requirements of the adopted Minerals and Waste Core Strategy for Oxfordshire¹²⁹ which has designated the land as a 'mineral strategic resource area' - Whilst WODC's draft policies are silent on minerals, the adopted Minerals and Waste Core Strategy for Oxfordshire¹³⁰ including Policy M8 (Safeguarding Mineral Resources) will control non-minerals development within MSAs. WODC will need to consult the County Council for any development proposed within Mineral Consultation Areas (covering MSAs and their surroundings).	The Local Plan, will be expected to ensure that potential impact on safeguarded minerals is avoided or minimised. Overall, a minor positive effect on the conservation of mineral resources is likely.

¹²⁹ Oxfordshire County Council (2017) Oxfordshire Minerals and Waste Local Plan. Part 1 – Core Strategy. Adopted Plan. September 2017. Available at: <https://www.oxfordshire.gov.uk/residents/environment-and-planning/planning/planning-policy/minerals-and-waste-policy/core-strategy> [Date accessed: 23/06/26]

¹³⁰ Oxfordshire County Council (2017) Oxfordshire Minerals and Waste Local Plan. Part 1 – Core Strategy. Adopted Plan. September 2017. Available at: <https://www.oxfordshire.gov.uk/residents/environment-and-planning/planning/planning-policy/minerals-and-waste-policy/core-strategy> [Date accessed: 10/07/26]

14 Soil

14.1 Baseline

- 14.1.1 National policies and strategies on soil, including DEFRA's 'Safeguarding our Soils' strategy¹³¹, seek to prevent soil pollution; reduce soil erosion from wind and water; maintain soil diversity; improve the quality of soil, including through promoting an increase in organic matter in soil; and increase the resilience of soils to a changing climate. Focus should be placed on protecting the quality and availability of agricultural land, through reducing soil degradation and maintaining soil productivity.
- 14.1.2 Soil is an essential and non-renewable resource that provides a wide range of ecosystem services including cycling water and nutrients, decomposing organic matter, carbon sequestration and supporting plant growth. Development can potentially have adverse impacts on soil stocks, such as by direct loss of soil (e.g. excavating), contamination, increased erosion, breakdown of structure and loss of nutrients. The quality of soils in the UK has rapidly degraded, predominantly due to intensive agricultural production and industrial pollution.
- 14.1.3 In accordance with paragraph 187 of the NPPF, the West Oxfordshire Local Plan should recognise that development can have an irreversible adverse (cumulative) impact on the finite stock of best and most versatile (BMV) land. The loss of BMV land should be minimised, as mitigation is rarely possible. BMV is usually indicated by Agricultural Land Classification (ALC). The ALC system classifies land into five categories according to versatility and suitability for growing crops. The top three grades, Grades 1, 2 and 3a, are referred to as BMV land¹³². The grades are as follows:
- Grade 1 – excellent quality agricultural land
 - Grade 2 – very good quality agricultural land
 - Grade 3 – good (3a) to moderate (3b) quality agricultural land
 - Grade 4 – poor quality agricultural land
 - Grade 5 – very poor-quality agricultural land
- 14.1.4 West Oxfordshire supports large areas of high-quality agricultural land, with the majority of the district classed as ALC Grade 3 (see **Figure 14.1**). Small sections in the south are classed as Grade 2, with areas of Grade 4 typically surrounding watercourses.

¹³¹ Department for Environment, Food & Rural Affairs (2022) Safeguarding our soils: A strategy for England. Available at: <https://www.gov.uk/guidance/thames-river-basin-district-river-basin-management-plan-updated-2022> [Date accessed: 20/04/26]

¹³² MAFF (2025) Agricultural Land Classification of England and Wales: Revised criteria for grading the quality of agricultural land. Available at: <http://publications.naturalengland.org.uk/publication/6257050620264448?category=5954148537204736> [Date accessed: 20/04/26]

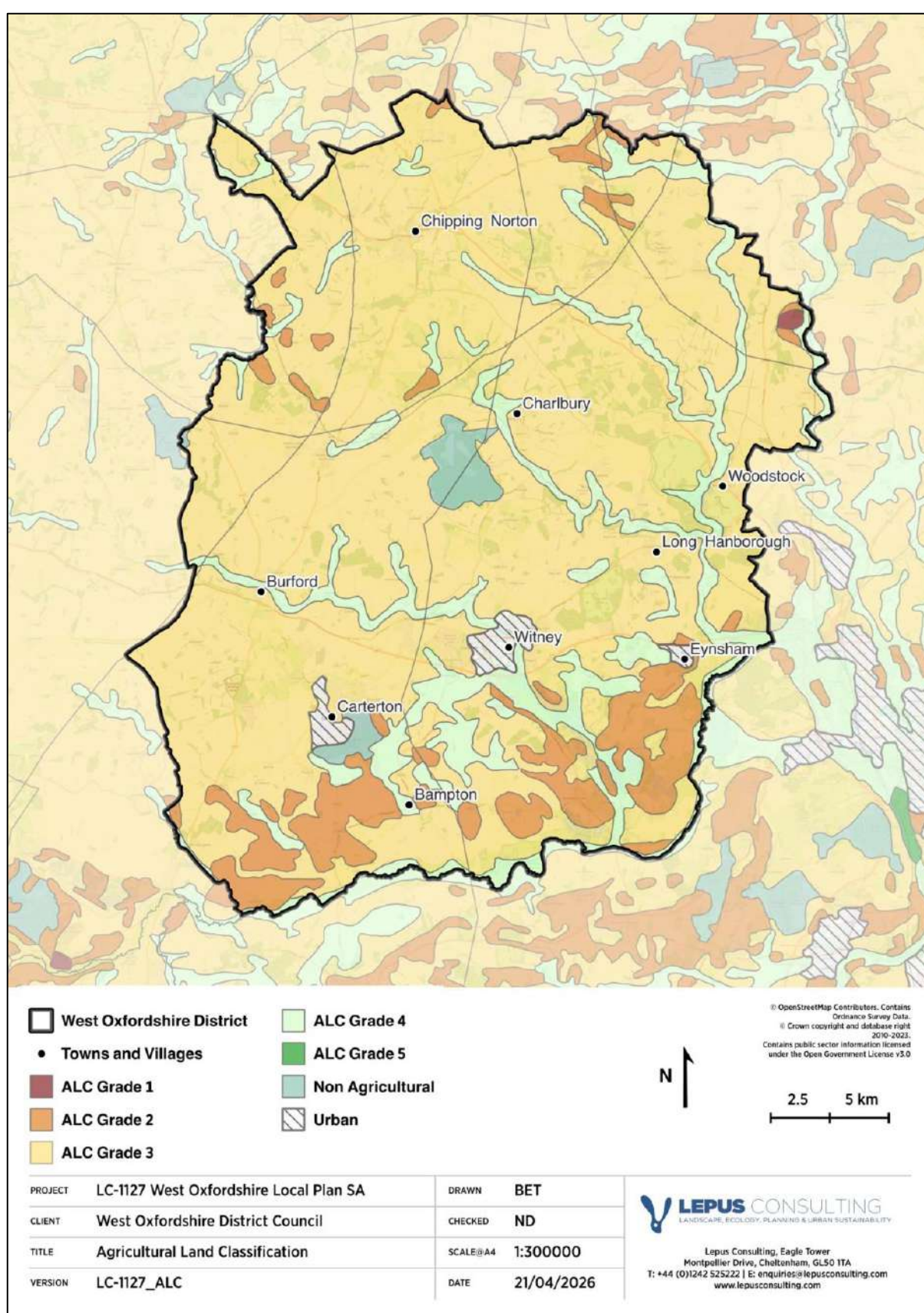


Figure 14.1: Agricultural Land Classification within West Oxfordshire

- 14.1.5 Soil pollution can refer to land which is contaminated by a range of pollutants including heavy metals, oils, chemicals, and radioactive substances¹³³.
- 14.1.6 In accordance with the core planning principles of the NPPF¹³⁴, development on previously developed land (PDL) will be recognised as an efficient use of land. Development on previously undeveloped land is not considered to be an efficient use of land. Development proposals situated on previously undeveloped land are expected to pose a threat to the soil resource within the proposal perimeter due to excavation, soil compaction, erosion and an increased risk of soil pollution and contamination during the construction phase. This is expected to be a permanent and irreversible impact.
- 14.1.7 It should be noted that PDL could also be of environmental value, and as such, potential impacts on natural resources shall be considered on a site-by-site basis. Building on PDL is of particular importance as the rural disposition of West Oxfordshire increases the demand for greenfield land to meet development needs.

Box 14.1: Summary of key sustainability issues: soil

Key issues for soil include:

- ⇒ Soil is a non-renewable resource that will continue to be lost as a result of new development. BMV soil may be under threat from new growth areas and associated infrastructure.
- ⇒ The rural disposition of West Oxfordshire means there is less scope for new development to avoid greenfield land and land with environmental value.

14.2 Evaluating the effect of the Local Plan on soil

- 14.2.1 Soil has been primarily considered under SA Objective 8: Natural Resources and Waste, which aims to ensure efficient use of the district's soil and mineral resources, alongside reducing waste. Soils are also relevant for SA Objective 2: Climate Change Adaptation and 3: Biodiversity and Geodiversity.

¹³³ UK Government (2024) Contaminated land. Available at: <https://www.gov.uk/contaminated-land> [Date accessed: 20/04/26]

¹³⁴ MHCLG (2024) National Planning Policy Framework. Available at: https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf [Date accessed: 20/04/26]

Table 14.1: Summary of identified effects of the Plan on soil

Identified effects on soil	Mitigating Local Plan policies	Summary of residual effect
1  Loss of soil resources The construction and occupation of new buildings on previously undeveloped land will be expected to result in a direct loss of soil resource, with little or no scope for mitigation. Some of these sites are located in areas where there is potential for the loss of BMV soil.	- SP2 (Spatial Strategy) takes a hierarchical approach to growth, with growth in Tier 1 (principal towns) making best use of previously developed land (PDL) and under-used sites. - DM1 (Green Infrastructure) will ensure that new development protects and enhances the GI network, including underlying soil resources. - DM8 (A Healthy Food Environment) requires all residential developments of 50 homes or more to provide space for community gardens or allotments, which may help to conserve high quality soil resources. - DM5 (Efficient Use of Land) ensures that the re-use of PDL will be strongly encouraged as a priority for new development. - DM28 (Supporting the Rural Economy) ensures that development is physically well-related to existing settlements where possible and uses PDL in preference to greenfield sites.	The proposed allocations would cumulatively result in the loss of a significant amount of previously undeveloped land. The loss of permeable soils has potential to increase the risk of flooding and result in a loss of biodiversity across the Plan area. Loss of soil can also result in an increase in soil erosion and have subsequent impacts on air quality and agricultural yield. Therefore, a residual adverse effect will be expected. The loss of previously undeveloped land, a large proportion of which could include BMV land, is expected to be a long-term and permanent significant adverse effect.

15 Water

15.1 Baseline

- 15.1.1 National water policies are primarily driven by the aims of the EU Water Framework Directive 2000/60/EC, as translated into national law by the Water Framework Regulations 2003. Key objectives include improving the quality of rivers and other water bodies to 'good' ecological status by 2027; considering flood risk at all stages of the Plan and development process in order to reduce future damage to property and loss of life; and incorporating water efficiency measures into new developments. Key PPPs for the West Oxfordshire Plan area includes the Thames River Basin Management Plan (RBMP)¹³⁵ which provides information on the status of surface and groundwater bodies and how water quality can be improved.

Water quality

- 15.1.2 The main watercourses flowing through West Oxfordshire include the Evenlode, Windrush, Glyme, Shill Brook and their tributaries, and the River Thames along the southern border (see **Figure 15.1**). These primarily drain into the Thames river basin district, however a small portion in the north of the Plan area drains into the Severn river basin district. Construction activities in or near watercourses have the potential to cause pollution, impact upon the bed and banks of watercourses and impact upon the quality of the water.
- 15.1.3 The ecological status of the River Thames in West Oxfordshire is 'poor', alongside sections of the Dorn confluence of the Glyme, Shill Brook and Radcot Cut, according to Environment Agency data¹³⁶, whilst the Enstone to Dorn section of the River Glyme, Evenlode, Cronwell Brook and Windrush are all classed as 'moderate'. The chemical status of all watercourses in West Oxfordshire are classed as 'fail' when ubiquitous, persistent, bioaccumulative and toxic substances (uPBTs) are considered.
- 15.1.4 Further development in West Oxfordshire has potential to impact the levels of wastewater and water quality in West Oxfordshire. A Water Quality Impact Assessment¹³⁷ was therefore undertaken to assess how the Cassington Wastewater Treatment Works can manage the increased levels of forecasted wastewater. Modelling suggested that the additional wastewater is unlikely to impact the water quality of the River Thames or other watercourses, however runoff from development sites will need to be suitably managed in the context of increased demand. Most of the district drains in the Rivers Windrush and the Evenlode, as well as the River Cherwell which lies to the northeast of the Plan area¹³⁸.

¹³⁵ Environment Agency (2022) Thames river basin district river basin management plan: updated 2022. Available at: <https://www.gov.uk/guidance/thames-river-basin-district-river-basin-management-plan-updated-2022> [Date accessed: 20/04/26]

¹³⁶ Environment Agency (2022) River Basin Management Plan: maps. Available at: <https://experience.arcgis.com/experience/73ed24b6d30441648f24f043e75ebed2/page/Introduction/> [Date accessed: 20/04/26]

¹³⁷ JBA Consulting (2021) West Oxfordshire District Council Water Quality Impact Assessment. Available at: <https://www.westoxon.gov.uk/media/114npx43/ev33-garden-village-water-quality-impact-assessment.pdf> [Date accessed: 20/04/26]

¹³⁸ AECOM (2025) West Oxfordshire Water Cycle Study Scoping Report. Available at: https://www.westoxon.gov.uk/media/oxuf3hnd/whs10174-wodc-scoping-water-cycle-study_v2-0.pdf [Date accessed: 20/04/26]

- 15.1.5 The 2026 Water Cycle Study¹³⁹ (WCS) found that planned growth will increase pressure on wastewater infrastructure, with some wastewater treatment works requiring upgrades during the plan period. However, with timely infrastructure investment, phased development and appropriate mitigation, growth is expected to be accommodated without significant adverse effects on water quality or Water Framework Directive objectives.
- 15.1.6 The vulnerability of groundwater to pollution is determined by the physical, chemical and biological properties of the soil and rocks, which control the ease with which an unprotected hazard can affect groundwater. Groundwater Source Protection Zones (SPZs) indicate the risk to groundwater supplies from potentially polluting activities and accidental releases of pollutants. These are classified into three zones: Inner Protection Zone (SPZ1); Outer Protection Zone (SPZ2); and Source Catchment Protection Zone (SPZ3). Only one small section of SPZ3 lies within West Oxfordshire, to the east of Chipping Norton.

Water resources

- 15.1.7 West Oxfordshire is supplied with water and sewerage services by Thames Water. The Thames Water Resource Management Plan (WRMP)¹⁴⁰ aims to manage and meet projected demand through encouraging water use efficiency, reducing leakage, installing smart meters, and implementing incentive-based tariffs to reduce high levels of consumption.
- 15.1.8 The national mandatory water efficiency standard is 125 litres per person per day, as set out in the Building Regulations 2010 Approved Document G¹⁴¹. West Oxfordshire currently seeks a higher standard of 110 litres per person per day¹⁴² with an aspirational goal of <75 litres.
- 15.1.9 It is likely that the demand for water and volume of wastewater will increase during the Plan period as the population increases and the climate changes. Wastewater treatment plants will need to ensure there is the capability to withstand the additional capacity and be expanded, if necessary, prior to development taking place.
- 15.1.10 Abstraction Licensing Strategies (ALS) set out the management of water abstraction at a local level. West Oxfordshire falls primarily within the Cotswold ALS, Thames Catchment ALS, alongside a small section of the Wye, Thame and Cherwell ALS¹⁴³. These catchments are subject to strict conditions regarding water abstraction, due to the lack of water availability in the River Thames downstream.

¹³⁹ WHS (2026) West Oxfordshire Water Cycle Study.

¹⁴⁰ Thames Water (2024) Revised Draft Water Resources Management Plan 2024. Available at: <https://thames-wrmp.co.uk/document-library/> [Date accessed: 20/04/26]

¹⁴¹ MHCLG (2016) The Building Regulations 2010: Approved Document G – Sanitation, hot water safety and water efficiency. Available at: <https://www.gov.uk/government/publications/sanitation-hot-water-safety-and-water-efficiency-approved-document-g> [Date accessed: 20/04/26]

¹⁴² West Oxfordshire District Council (2023). Sustainability Standards Checklist. Available at: <https://www.westoxon.gov.uk/planning-and-building/planning-permission/make-a-planning-application/planning-application-supporting-information/sustainability-standards-checklist/#:~:text=Local%20Plan%20Policy%20OS3%20requires,litres%20per%20person%20per%20day>. [Date accessed: 20/04/26]

¹⁴³ Ibid.

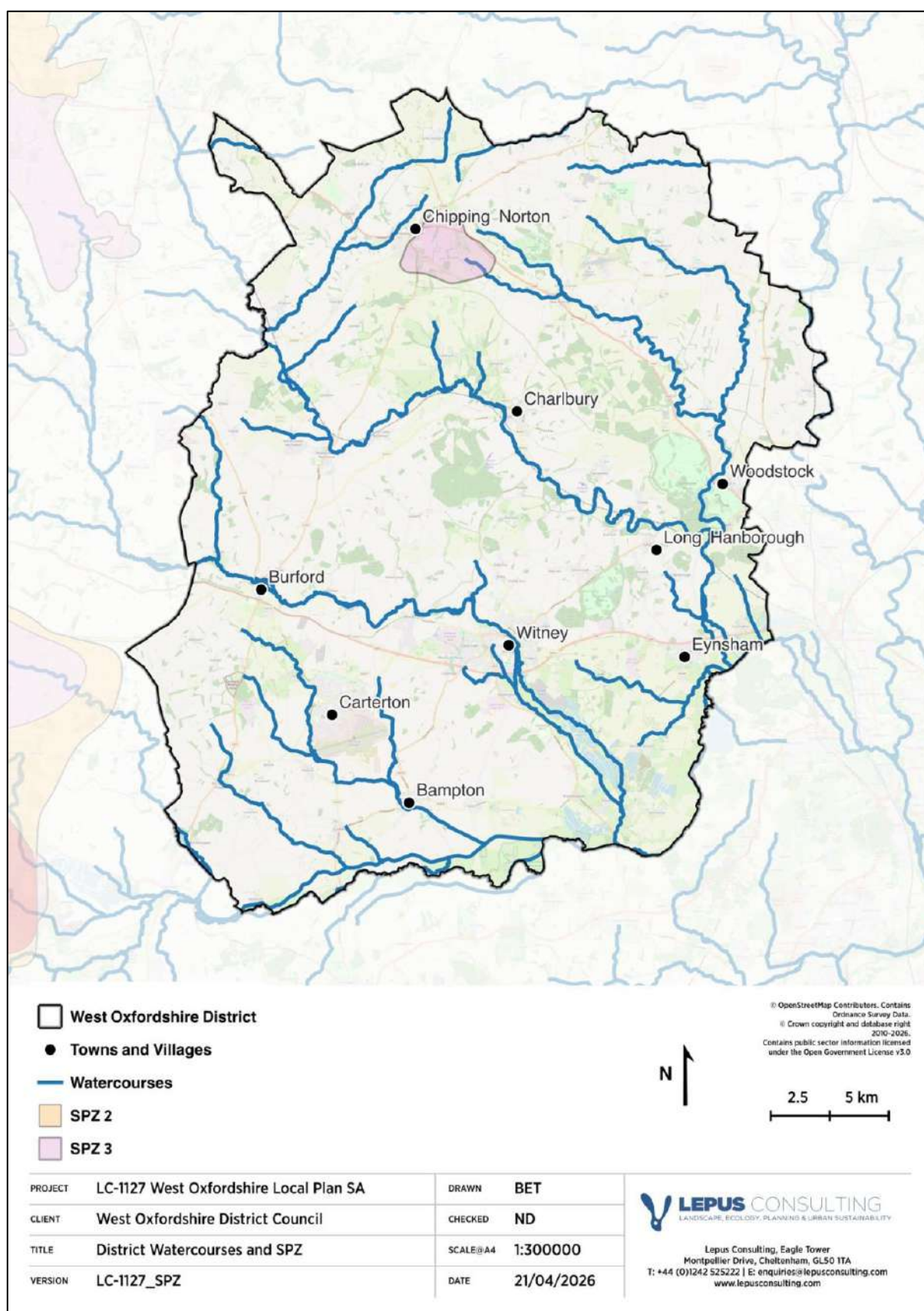


Figure 15.1: Watercourses and groundwater SPZ within West Oxfordshire

Box 15.1: Summary of key sustainability issues: water

Key issues for water include:

- ⇒ The increasing population in West Oxfordshire, alongside new development, is likely to place pressure on water resources. This may result in a deficit between supply and demand if not carefully planned and managed alongside Thames Water, particularly as West Oxfordshire is located within an area of 'water stress'.
- ⇒ It is important to consider the impacts of development proposals on wastewater treatment in the local area and the capacity of water treatment works. There is a need to reduce the frequency of wastewater discharge into rivers during periods of storm overflow.
- ⇒ Poor water quality conditions remain an issue, with no watercourses in West Oxfordshire achieving 'good' ecological status, and all classed as 'fail' for chemical status. There may be consequences of new wastewater generation for local water quality, and the ecological status of ground and surface water bodies.
- ⇒ Most forms of development reduce the amount of rainfall that is intercepted by vegetation on the ground, which can have detrimental implications for surface water run-off.
- ⇒ Potential cross-boundary effects need to be considered with regard to development that may impact the River Thames. Water abstraction also has strict limitations in order to avoid exacerbating water deficits for the River Thames downstream.

15.2 Evaluating the effect of the Local Plan on water

- 15.2.1 In the SA process, water has been considered largely under SA Objective 7: Water, which seeks to maintain and improve water quality and ensure efficient use of water resources. Flooding has been considered under SA Objective 2: Climate Change Adaptation (see **Chapter 9** – Climatic Factors).

Table 15.1: Summary of identified effects of the Plan of water

Identified effects on water	Mitigating Local Plan policies	Summary of residual effect
1  Reduction in water quality The construction and occupation of new development has potential to increase the risk of contamination of waterways, primarily due to increased runoff, as well as the cumulative effect of sewage discharge outflows during storm conditions. Decreased water quality may compromise ecosystem service functions of the water environment with implications for wellbeing of humans as well as biodiversity. Additionally, a small number of allocated sites are located within a groundwater SPZ, where new development is more likely to lead to groundwater contamination.	- CP4 (Delivering Infrastructure In-Step with New Development) requires developers to demonstrate that there is acceptable wastewater capacity and surface drainage to serve the new development. - CP5 (Water Environment) requires development proposals to demonstrate full consideration of wastewater management and water quality, ensuring that development does not adversely impact water bodies or aquatic ecosystems, outlining strategies to prevent water pollution during and after construction. - DM1 (Green Infrastructure) promotes the protection, enhancement, and expansion of West Oxfordshire's GI network, with likely multi-functional benefits including for filtration of pollutants and improving water quality.	The Local Plan policies, and consultation with water companies, will be likely to partially mitigate impacts on water quality and ecosystem services. The implementation of SuDS will also help to treat diffuse pollution at the source to avoid adverse impacts on water quality. However, development is also likely to cumulatively increase the risk of raw sewage being disposed of in river channels during storm events, which will require additional monitoring in order to alleviate water quality issues. In line with the precautionary principle, a residual adverse impact on water quality and ecosystem services is identified. Deterioration in water quality and ecosystem services has the potential to be a long-term but potentially temporary significant adverse effect.

Identified effects on water	Mitigating Local Plan policies	Summary of residual effect
2  Increased demand for water and wastewater management The proposed development of 18,318 new homes and new employment floorspace through the Plan will increase the demand for water resources and place increased pressure on wastewater management infrastructure.	- CP5 (Water Environment) requires new developments to demonstrate full consideration of wastewater management. - CP4 (Delivering Infrastructure In-Step with New Development) requires developers to demonstrate that there is acceptable wastewater capacity to serve the new development.	Measures within national policies and the Local Plan policies to improve water efficiency. Water supply issues will be addressed through the higher-level water planning framework and licencing process (RBMP, WRMP, Drought Plans and CAMS). Wastewater disposal will be addressed via Thames Water and their DWMP. Effluent discharge to the water is also controlled through an environmental permitting system which is administered by the EA. Whilst it is likely that these measures will mitigate any adverse effects, the 2026 Water Cycle Study identifies that planned growth will increase pressure on wastewater infrastructure, with some wastewater treatment works requiring upgrades during the plan period. However, it concludes that, subject to timely infrastructure investment, phased development and appropriate mitigation, sufficient wastewater and water supply capacity is expected to be available to support planned growth without significant adverse effects on the water environment. Planned growth is expected to increase pressure on water supply and wastewater management infrastructure. However, the Water Cycle Study concludes that, with timely infrastructure upgrades and phased development, these pressures can be accommodated without significant adverse effects on the water environment.

16 Cumulative effects assessment

16.1 Overview

- 16.1.1 Cumulative effects assessment (CEA) is the process of identifying and evaluating the effects that arise when the total significant effects of the West Oxfordshire Local Plan and assessed alongside known existing underlying trends and other plan and programmes.
- 16.1.2 Cumulative effects are different from effects that occur alone. Alone, the Local Plan may not result in residual adverse effects for a particular topic, for example the effects of urban sprawl on landscape character, but when considered cumulatively, may result in significant effects that require mitigation or monitoring.
- 16.1.3 **Table 16.1** summarises the residual effects identified for each of the SEA topics (as set out in **Chapters 7-15**) and presents the likely cumulative effects of the Local Plan when considering these alongside other plans and programmes as well as national trends.

Table 16.1: Cumulative effects assessment of the West Oxfordshire Local Plan

Summary of identified effects	Details of the cumulative effect	Cumulative effect
Air Increased emission of, and exposure to, air pollution	National and local policy is expected to improve air quality over time, including the transition to zero emission vehicles and the promotion of sustainable transport through planning policy and infrastructure investment. These measures will help to reduce reliance on private vehicles and limit emissions in the longer term. Although no significant effects have been identified for air quality alone, when considered as a part of overall growth within West Oxfordshire and alongside development in neighbouring authorities, the WODC Local Plan is likely to increase traffic flows and associated emissions of NO₂ and PM₁₀, particularly in areas close to AQMAs and the strategic road network. This is likely to result in increased exposure to air pollution for some residents and may have secondary effects on human health and ecological networks. Overall, the WODC Local Plan is likely to result in a short to medium-term cumulative adverse effect on air quality, with potential for this to reduce over the longer term as cleaner technologies and transport decarbonisation are implemented.	-
Biodiversity, flora and fauna - Threats or pressures to European sites - Threats or pressures to nationally designated biodiversity sites - Threats or pressures to locally designated and non-statutory biodiversity sites	Biodiversity in the Plan area will continue to benefit from strong international, national and local policy frameworks. The WODC Local Plan includes policies to protect designated sites, apply the mitigation hierarchy and deliver BNG, which should reduce many site-specific impacts. Together with existing safeguards, this provides a strong protection framework, although delivery of mitigation measures, including nutrient neutrality solutions, remains partly uncertain in some cases. However, cumulatively, the scale, distribution and nature of allocations are likely to result in adverse effects across multiple biodiversity receptors. Many sites are on previously undeveloped land and close to sensitive ecological assets, including European sites, SSSIs, ancient woodland, priority habitats and locally designated sites such as LWSs. Although effects on European site integrity are expected to be avoided, this depends	-

Summary of identified effects	Details of the cumulative effect	Cumulative effect
Fragmentation of the ecological network	on effective mitigation delivery and ongoing monitoring, which introduces residual uncertainty. At the landscape scale, combined habitat loss, fragmentation and increased recreational pressure are likely to contribute to incremental degradation of ecological networks. Concentrations of development near locally designated and non-statutory sites increase the risk of permanent habitat loss and reduced ecological connectivity that cannot be fully offset through mitigation or BNG. These effects may be compounded by wider growth in neighbouring areas and existing environmental pressures. While BNG may deliver localised habitat enhancements, these gains are unlikely to fully compensate for cumulative losses of semi-natural habitats and the progressive erosion of ecological coherence across the wider landscape. Consequently, the WODC Local Plan is expected to result in a significant long-term cumulative adverse effect on biodiversity.	
Climatic factors - Risk of fluvial and surface water flooding (present and future) - Increased GHG emissions - Loss of multi-functional green infrastructure	National policy and technological advances are expected to support climate change mitigation and adaptation, including the transition to net zero, improved building standards and investment in renewable and low-carbon energy infrastructure. The WODC Local Plan includes a strong policy framework to reduce emissions, manage flood risk and enhance green and blue infrastructure, which will contribute to improved climate resilience over the longer term. However, when considered alongside growth in neighbouring authorities, the WODC Local Plan is likely to increase GHG emissions, particularly from transport and construction, and result in the loss of some existing greenfield land and associated carbon storage and climate regulation functions. In combination with wider trends of climate change, including increased frequency of extreme weather events, this may place additional pressure on flood risk management systems and the resilience of communities and infrastructure. While fluvial and surface water flood risk is expected to be effectively managed through the application of the Sequential and Exception Tests and the recommendations of the Level 2 SFRA, and GI provision is likely to increase overall, these measures are unlikely to fully offset the cumulative effects of increased emissions and climate pressures. Overall, the WODC Local Plan is likely to result in a long-term cumulative adverse effect on climatic factors, with some benefits from adaptation and resilience measures, and potential for effects to reduce over time as decarbonisation progresses.	-
Cultural Heritage - Alter the character and/or setting of designated heritage assets - Alteration of character or setting	West Oxfordshire's historic environment will continue to benefit from strong legislative and policy protection at national and local levels, including heritage policies within the WODC Local Plan which seek to conserve designated heritage assets and their settings. However, when considered cumulatively alongside the proposed development, programmes and committed development within the borough, there remains potential for incremental change to the historic environment. A number of allocations are located	-

Summary of identified effects	Details of the cumulative effect	Cumulative effect
of non-designated heritage assets	within the setting of listed buildings, Conservation Areas and Scheduled Monuments. Whilst individual developments are unlikely to result in significant harm, the combined effect of dispersed new development, particularly within rural areas, may gradually alter historic landscape character and the setting of heritage assets. Mitigation secured through planning policy, heritage legislation and development management is expected to minimise adverse effects and ensure impacts are appropriately managed. Overall, the WODC Local Plan is likely to result in a moderate and potentially long-term cumulative adverse effect on cultural heritage.	
Human health - Sustainable access to healthcare / leisure facilities - Limited access to/net loss of public greenspace	The WODC Local Plan includes a range of policies to support health and wellbeing, including the provision of new healthcare, leisure and green space infrastructure, and the promotion of active travel through improved walking, cycling and public transport networks. These measures are expected to enhance access to services and recreational opportunities over time, particularly as new infrastructure is delivered alongside development. However, the overall growth and distribution of development, including sites located beyond sustainable distances to existing healthcare and leisure facilities, may place increased pressure on existing infrastructure, particularly when considered alongside growth in neighbouring authorities. While new provision of green space and improvements to active travel networks are expected to support healthier lifestyles and partially offset these effects, accessibility constraints and environmental exposures are unlikely to be fully mitigated in all locations. Overall, the WODC Local Plan is likely to result in a mixed cumulative effect on human health, with medium to long-term positive effects associated with improved access to green space and active travel, alongside localised and longer-term adverse effects relating to accessibility.	+/-
Landscape - Threats or pressures to the Cotswolds National Landscape - Loss or alteration of landscape character and sensitive / locally designated landscapes	Nationally and regionally, designated landscapes such as the Cotswolds National Landscape benefit from strong policy and legislative protection, and local plan policies seek to conserve landscape character, protect settlement identity, and promote high-quality, landscape-led design. The WODC Local Plan includes a robust framework for the protection of designated landscapes and country parks, as well as measures to safeguard key views, maintain separation between settlements, and integrate green infrastructure. However, the overall development proposed in the WODC Local Plan, much of which is located on land with environmental value, will introduce urbanising influences into rural areas. A number of allocations are located within or adjacent to areas of moderate landscape sensitivity and in proximity to the Cotswolds National Landscape, increasing the potential for adverse effects on landscape character, visual amenity, tranquillity and the setting of designated landscapes.	-

Summary of identified effects	Details of the cumulative effect	Cumulative effect
	When considered alongside planned growth in WODC and neighbouring authorities, there is potential for cumulative effects including incremental loss of open countryside and erosion of landscape character. While policies will help to mitigate and manage these effects, they are unlikely to fully offset the combined influence of multiple developments over time. Overall, the WODC Local Plan is likely to result in a long-term, permanent cumulative minor to moderate adverse effect on landscape, with localised significant effects in more sensitive areas, including designated landscapes and areas where settlement separation is reduced.	
Population and material assets - Provision of new homes - Provision of employment opportunities - Sustainable access to, and pressure on, local services and facilities - Waste generation - Sterilisation of mineral resources	The Local Plan is expected to result in positive cumulative effects through the delivery of 18,318 new homes and sufficient employment land to meet identified needs. This is anticipated to support the provision of a diverse housing supply, including homes that meet the needs of different groups, alongside new employment opportunities and economic growth. The delivery of new development is also expected to support access to services and facilities through improvements to transport networks, developer contributions and the provision of new infrastructure. However, some rural locations may continue to experience challenges in accessing services sustainably, with the effectiveness of Travel Plans and ongoing monitoring being important in addressing these issues. The scale of growth proposed through the Local Plan is likely to increase pressure on waste management infrastructure, with the potential for a medium-term significant adverse cumulative effect associated with increased waste generation and limited landfill capacity for non-inert waste. However, sufficient capacity is identified for recycling, composting and inert waste management. Potential impacts on safeguarded mineral resources are expected to be minimised through the application of minerals safeguarding policies. Overall, the Local Plan is likely to result in a long-term positive cumulative effect in relation to population and material assets, reflecting the benefits of increased housing provision, employment opportunities and investment in supporting infrastructure, although with some ongoing pressures associated with waste capacity and sustainable access to services.	+
Soil Loss of soil resources	The proposed allocations would result in the cumulative loss of areas of previously undeveloped land. Provisional data indicates that a significant proportion of this land may comprise BMV agricultural land, although this is subject to confirmation through detailed surveys. While policies seek to protect soils, prioritise PDL, and enhance GI, opportunities for mitigation are limited given the permanent nature of soil loss. When considered alongside wider development pressures, this may contribute to increased surface runoff, reduced soil function, loss of agricultural productivity, and secondary effects on biodiversity and climate regulation.	-

Summary of identified effects	Details of the cumulative effect	Cumulative effect
	Overall, a long-term, permanent cumulative adverse effect is identified.	
Water - Reduction in water quality - Increased demand for water and wastewater management	Water quality and resources will continue to be managed through national regulatory frameworks (e.g. WFD, WRMPs and DWMPs), alongside WODC Local Plan policies which promote water efficiency, sustainable drainage and coordination of development with infrastructure provision. However, when considered alongside growth within neighbouring authorities, there is potential for cumulative pressure on wastewater infrastructure and water quality. While mitigation and investment are expected to address some impacts, there remains potential for localised deterioration in water quality (e.g. ammonia concentrations), as well as risks associated with increased discharge and surface runoff. Overall, a long-term cumulative adverse effect is identified, subject to the timely delivery of infrastructure and mitigation measures.	-

17 Monitoring

17.1 Context

- 17.1.1 Regulation 17 of the SEA Regulations states “*The responsible authority shall monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action*”.
- 17.1.2 The purpose of monitoring is to measure the environmental effects of the Plan as well as its success against its objectives. However, monitoring can place a heavy burden on financial and human resources, and it may therefore be practical to focus on monitoring residual adverse effects and to build on existing monitoring systems.
- 17.1.3 Monitoring the impacts of the Local Plan should seek to answer:
- Was the likelihood of sustainability impacts identified in the SA process accurate?
 - Is the Local Plan successful in achieving its desired sustainability objectives?
 - Are mitigation measures performing as expected?
 - Are there any unforeseen adverse impacts of the Local Plan, and if so, are these within acceptable limits or is remedial action required?

17.2 Monitoring proposals

- 17.2.1 Monitoring proposals are set out in **Table 17.1** for WODC to consider in the implementation of the West Oxfordshire Local Plan.

Table 17.1: Proposals for monitoring adverse sustainability impacts of the WODC Local Plan

Theme/ SEA Regulations	Indicator	Scale and frequency	Target
Air	Concentration of NO ₂ and PM ₁₀	Annually, Plan area wide	Decrease
Air	Road network performance	Bi-annually, Plan area wide	Decrease
Air	Number of vehicle trip credits (i.e. vehicle trip generation from new development)	Bi-annually, Plan area wide	Decrease
Air	Rates of public transport uptake	Annually, Plan area wide	Increase
Biodiversity, flora and fauna	Percentage of SSSIs in favourable condition	Annually, Plan area wide	Increase
Biodiversity, flora and fauna	Number of planning approvals granted contrary to the advice of Natural England	Annually, Plan area wide	Zero
Biodiversity, flora and fauna	Change to the ecological network (loss or gain)	Annually, Plan area wide	Increase
Biodiversity, flora and fauna	Quality and extent of priority habitats and species	Annually, Plan area wide	Increase
Biodiversity, flora and fauna	Uplift in BNG units within West Oxfordshire	Annually, Plan area wide	Increase

Theme/ SEA Regulations	Indicator	Scale and frequency	Target
Biodiversity, flora and fauna	Implementation of measures from the Oxfordshire LNRS	Various	Various
Climatic factors	CO ₂ emissions per capita	Annually, Plan area wide	Decrease
Climatic factors	Percentage of energy generated from renewable sources	Annually, Plan area wide	Increase
Climatic factors	Number of properties at risk of flooding	Annually, Plan area wide	Decrease
Climatic factors	Extent of surface water flood risk	Annually, Plan area wide	Decrease
Climatic factors	Fluvial/tidal flood risk along the River Thames	Annually, Plan wide area	Decrease
Cultural heritage	Number of conservation area appraisals	Annually, Plan area wide	Increase
Cultural Heritage	Number of heritage assets identified as 'heritage at risk'	Annually, Plan area wide	Decrease
Human health	Percentage of physically active adults	Bi-annually, Plan area wide	Increase
Human health	Number of GP surgeries	Annually, Plan area wide	Increase
Human health	Hectares of accessible open space per 1,000 population	Annually, Plan area wide	Increase
Landscape	Quantity of development in sensitive landscapes	Annually, Plan area wide	Zero
Landscape	Quality and extent of green infrastructure	Annually, Plan area wide	Increase
Population and material assets	Number of affordable housing completions	Annually, Plan area wide	Increase
Population and material assets	Percentage of economically active residents	Annually, Plan area wide	Increase
Population and material assets	LSOAs in West Oxfordshire within the 10% most deprived in Great Britain	Every 3 to 4 years, Plan area wide	Decrease
Population and material assets	Quantity of household waste sent to landfill	Annually, Plan area wide	Decrease
Population and material assets	Quantity of commercial and industrial waste recycled	Annually, Plan area wide	Increase
Population and material assets	Area of safeguarded mineral resources	Annually, Plan area wide	Maintain
Soil	Number of dwellings built on previously developed or brownfield land	Annually, Plan area wide	Increase
Soil	Area of contaminated land remediated	Annually, Plan area wide	Increase
Water	Number of planning permissions granted contrary to Environment Agency advice	Annually, Plan area wide	Zero
Water	Number of waterbodies classified as 'good' ecological status	Annually, Plan area wide	Increase
Water	Number of overflow events of untreated sewage discharges into rivers	Annually, Plan area wide	Zero
Water	Water efficiency in new homes	Annually, Plan area wide	Increase
Water	Water availability for extraction	Annually, Plan area wide	Increase

18 How the SA has influenced the Plan

18.1 The role of the SA

- 18.1.1 The SA has been an influential tool throughout the plan making process to date. It works on an iterative basis. The plan makers identify various options at different stages of the plan making process which are subsequently appraised through the SA process using the methodology in **Chapter 4**.
- 18.1.2 The SA findings have been used to help refine policy choices and site options through to the final proposals set out in the WODC Local Plan. The SA site assessments, i.e. pre- and post-mitigation scoring against 13 objectives, were reviewed in the Council's consideration of site 'suitability' in the Land Availability Assessment.
- 18.1.3 The process of appraisal is sequential in nature: an assessment of impacts is made, the mitigation hierarchy is applied, and the assessment of effects is revisited, leading to the identification of residual effects. The mitigation hierarchy is an important element of the assessment process. It considers firstly if the identified adverse effect can be avoided and if not, if it can be adequately mitigated to reduce the effect.
- 18.1.4 SA is necessarily a high-level assessment process, often using secondary data at a scale which is plan-based to make assessments about smaller-scale sites. This can introduce uncertainty to the process (see assumptions and limitations **Chapter 4** and **Appendix E**). The application of the precautionary principle means that when doubt prevails, a worst-case scenario is identified.
- 18.1.5 The likely evolution of the baseline without the Plan (see **Table 3.1**) shows that there are already a number of important trends, some of which are negative in nature. These include matters such as air quality, GHG emissions and flood risk; events associated with a changing climate and that are likely to continue without the Local Plan.

18.2 Recommendations

Table 18.1: Summary of recommendations and actions throughout the SA process

SA Objective	Recommendations made in the Regulation 18 Preferred Policy Stage	Actioned
SA Objective 1: Climate change mitigation	- Policy CP9 could support secondary positive effects in relation to climate change through specific reference to GI and the multifunctional benefits it can provide. - Policy DM32 could benefit from specific reference to GI which would support a wider range of positive effects in relation to climate change mitigation. - Policy DM14 would benefit from including specific wording regarding the energy efficiency of listed buildings and how these can be redeveloped or designed for longevity, possibly linking with or making reference to Policy DM7 'Retrofitting for Energy Efficiency, Carbon Reduction and Climate Resilience. - Regeneration strategies should address issues associated with urbanisation, including resilience to climate change. The Local Plan should promote innovative re-use of existing building stocks, including developments which would improve the energy efficiency of historic buildings and take into account	- CP9 is now CP7. Recommendation has been actioned. Development proposals will be expected to address the following requirements... <i>'Integrating green infrastructure, urban greening and nature-based solutions to support physical and mental wellbeing'</i> - DM32 is now DM24. Recommendation has not been actioned. - DM14 has been deleted - DM7 is now DM11. Specific reference to retrofitting of heritage and traditional buildings, including improving energy efficiency, reducing carbon emissions, addressing climate risks and mitigation. Including: "Heritage and Traditional Buildings A sensitive and supportive approach will be taken to retrofitting heritage assets. Proposals should: Seek to improve energy performance while conserving heritage significance; Use appropriate materials and design; and

SA Objective	Recommendations made in the Regulation 18 Preferred Policy Stage	Actioned
	their embodied carbon value when considering their retention and re-use, versus their replacement. As part of additional supporting evidence for the Local Plan, WODC could consider commissioning a climate change study and calculating / reporting on greenhouse gas emissions in greater detail. This could include use of the Greenhouse Gas Accounting Tool¹⁴⁴. More detailed carbon footprint data for the Plan area would enable the SA process to evaluate changes to carbon emissions as a consequence of the Plan in terms of (a) evolution of the baseline without the plan, and (b) effect on climate change through increased or decreased emissions, with the Plan.	Be informed by a proportionate understanding of the building's significance and condition. Where harm to significance arises, this must be clearly justified and outweighed by public benefits in line with national policy." Policy DM26 on Conversion, Extension and Alteration of Traditional Buildings encourages reuse and energy efficiency.
SA Objective 2: Climate change adaptation	- The draft Local Plan Objectives could be strengthened by making direct reference to flood risk, heat risk and energy efficiency, which would strengthen the performance of the objectives against climate change adaptation (SA Objective 2). - Policy DM7 could be strengthened by expanding on the specifics of climate adaptation measures. For example, including more detailed strategies for increasing flood resilience, such as the use of water-resistant materials, raising structures above flood levels, or incorporating effective drainage systems to manage stormwater. - Policy DM32 could benefit from specific reference to GI which would support a wider range of positive effects in relation to climate change adaptation. - Policy CP6 could be strengthened through specific reference to green space and/ or GI to ensure developments provide a wide range of infrastructure to meet the needs of residents and secure multi-functional benefits. - WODC should have regard to the recommendations of the Environment Agency including ensuring that policies, site allocations and design of development takes into account climate change, and that strategic water planning, drainage and infrastructure is adequate to serve new growth via early engagement with water companies (see Table 1.2).	- Recommendations have not been actioned. No specific reference to risks mentioned. - DM7 is now DM11. Recommendation has not been actioned. - DM32 is now DM24. Recommendation has not been actioned. - CP6 is now CP4. Specific reference to open space and green infrastructure.
SA Objective 3: Biodiversity and geodiversity	- Policy CP9 could support secondary positive effects in relation to biodiversity through specific reference to GI and the multifunctional benefits it can provide. - Policy DM3 could be strengthened by specifying biodiversity enhancements, such as native planting and including wildlife habitats. The policy could provide further wording to encourage the design of facilities to be multifunctional, such as play areas with green roofs or sports fields that incorporate flood mitigation features like permeable surfaces or swales. - Policy DM32 could benefit from specific reference to GI which would support a wider range of positive effects in relation to biodiversity. - The Local Plan policies would be strengthened through more specific reference to the emerging Oxfordshire Local Nature Recovery Strategy¹⁴⁵	- CP9 is now CP7. The policy includes provisions for biodiversity enhancement, including urban greening, nature-based solutions, and the delivery of high-quality green and open spaces that provide a range of environmental and social benefits. However, there is no specific reference to green infrastructure as a multifunctional network, nor is there explicit recognition of the full range of multifunctional benefits that green infrastructure can provide. - DM3 is now DM7. Recommendations have not been actioned. There is reference to it in rural settlement and villages, where multifunctional facilities are mentioned. - DM32 is now DM24. Recommendation has not been actioned.

¹⁴⁴ Local Partnerships (2023) Greenhouse Gas Accounting Tool and Waste Emissions Calculator. Available at: <https://localpartnerships.org.uk/greenhouse-gas-accounting-tool/> [Date accessed: 27/06/25]

¹⁴⁵ Oxfordshire County Council (2024). Draft Oxfordshire Local Nature Recovery Strategy. Available at: <https://letstalk.oxfordshire.gov.uk/lnrs-phase3-consultation> [Date accessed: 25/04/25]

SA Objective	Recommendations made in the Regulation 18 Preferred Policy Stage	Actioned
	ensuring that enhancements and protection is aligned with identified recovery areas opportunity areas and that GI associated with development sites contributes to this wherever possible. - Developers, residents, landowners and managers of open spaces should be encouraged to adopt a cooperative approach that connects buildings, gardens and public spaces to create a vibrant and diverse network of interconnected species and habitats. Such a network would provide benefits to flora and fauna in the Plan area. - The findings and recommendations of the emerging Habitats Regulations Assessment (HRA) of the Local Plan should be taken into account and incorporated into the Local Plan policies.	The Local Nature Recovery Strategy (LNRS) is referenced within Objective 3 and CP1, which seeks to strengthen environmental resilience, including in areas identified through the LNRS. This is further supported by CP10 (Nature Recovery), which specifically requires development proposals to align with and contribute towards the delivery of the Oxfordshire Local Nature Recovery Strategy, providing a clear mechanism for supporting nature recovery priorities and ecological network enhancement.
SA Objective 4: Landscape	- Changing land uses can help to rejuvenate and modernise landscapes and townscape and should be supported so long as the design, layout and architecture embraces the existing public realm, especially when this includes iconic post-industrial landmarks and distinctive buildings. - Updated landscape character, sensitivity and/or capacity assessments would aid the identification of suitable areas that could accommodate strategic growth without compromising West Oxfordshire's unique landscape character and qualities.	A landscape and heritage assessment is currently in progress.
SA Objective 5: Cultural heritage	- There is opportunity to strengthen the performance of the Local Plan objectives with regard to cultural heritage. The objectives would benefit from including reference to the conservation and enhancement of heritage assets to align with the NPPF. - Policy DM14 would benefit from including specific wording regarding the energy efficiency of listed buildings and how these can be redeveloped or designed for longevity, making reference to specific guidance from Historic England as well as possibly linking with or making reference to Policy DM7 'Retrofitting for Energy Efficiency, Carbon Reduction and Climate Resilience. - Policy DM15 will benefit from including wording regarding the energy efficiency of historic buildings within CAs and how materials used can increase longevity, making reference to specific guidance from Historic England. - Regeneration strategies should address issues associated with urbanisation. The Local Plan should promote innovative re-use of existing building stocks, including developments which would improve the energy efficiency of historic buildings. The District Council should refer to Historic England's guidance on keeping historic buildings in good repair. - WODC should have regard to the recommendations of Historic England including ensuring that the historic environment and cultural heritage assets are considered in wider nature recovery, GI and climate change initiatives (see Table 1.2).	- DM14 has been deleted - DM15 has been deleted - DM7 is now DM11. Specific reference to retrofitting of heritage and traditional buildings, including improving energy efficiency, reducing carbon emissions, addressing climate risks and mitigation. Including: <i>"Heritage and Traditional Buildings:</i> <i>A sensitive and supportive approach will be taken to retrofitting heritage assets. Proposals should:</i> <i>Seek to improve energy performance while conserving heritage significance;</i> <i>Use appropriate materials and design; and</i> <i>Be informed by a proportionate understanding of the building's significance and condition.</i> <i>Where harm to significance arises, this must be clearly justified and outweighed by public benefits in line with national policy."</i> - DM5 encourages the redevelopment and reuse of previously developed land, thereby reducing pressure on greenfield sites. DM11 further supports the reuse of historic buildings, explicitly recognising the need to enhance energy performance and sustainability while safeguarding their historic significance and ensuring appropriate conservation. - Conservation of traditional buildings and their character whilst incorporating sustainable energy system, reducing carbon emissions and addressing climate risks is included in DM11.
SA Objective 6: Air quality	More direct reference to protecting and improving air quality would further strengthen the performance of the draft Local Plan Vision against SA Objective 6.	Direct reference to air quality in any objective or vision has not been actioned.
SA Objective 7: Water	More direct reference to protecting and improving water quality would further strengthen the	No reference to water or water quality in vision. Recommendation not actioned.

SA Objective	Recommendations made in the Regulation 18 Preferred Policy Stage	Actioned
	performance of the Local Plan vision against SA Objective 7. Direct reference to protecting and enhancing water quality would strengthen the performance of the Local Plan objectives	Reference to water environment in Objective 3. <i>Adopting an integrated, holistic approach to the management of all aspects of the water environment.</i> No mention of protecting and improving water quality, however it is likely implied. Stronger, specific reference should be mentioned.
SA Objective 8: Natural resources and waste	- Expanding the wording of Policy DM15 regarding the reuse of historic structures will strengthen the policy with regard to the sustainable use of natural resources. By prioritising the adaptive reuse of existing historic structures, the policy reduces the demand for new construction materials, thereby lowering resource consumption, energy use, and carbon emissions associated with demolition. - Waste strategies and policies will need to account for managing an increased volume and potentially more diverse waste outputs associated with a range of industrial, commercial and technological growth.	- DM15 has been deleted. Relevant provisions are now contained within DM11, which specifically supports the reuse of historic and traditional buildings. The policy includes references to energy efficiency, appropriate materials and design. Whilst there is no explicit reference to the use of sustainable materials, the policy encourages the reuse of existing buildings and materials. - Policies addressing waste management include DM11, which promotes the retrofitting and reuse of existing buildings, thereby helping to reduce construction waste. - DM12 (Waste and Circular Economy) contains comprehensive waste-related requirements. The policy requires developers to minimise waste during both construction and operation through efficient design, the reduction of hazardous substances, and the use of modular components where appropriate. Major development proposals must submit both a Construction Waste Management Plan and an Operational Waste Management Plan, setting out measures for recycling, composting and waste reduction. The policy also promotes adherence to the waste hierarchy. - There is no specific reference to waste management within policies supporting industrial, commercial or technological growth. Waste-related provisions are primarily focused on residential and general development proposals. In addition, there is limited consideration of the potential increase in waste volumes arising from future economic growth and development, and this could be addressed more explicitly within the policy framework.
SA Objective 9: Housing and equality	- Policy CP6 could be strengthened through specific reference to green space and/ or GI to ensure developments provide a wide range of infrastructure to meet the needs of residents and secure multi-functional benefits. - Residential uses in town centres such as above retail areas should be promoted where appropriate, to help reduce the quantity of new land required to meet housing demands and make more efficient use of space. - The Local Plan should ensure development proposals, particularly in dense areas such as town centres, promote a safe and accessible neighbourhood, helping to reduce crime and the fear of crime. Consider supporting the use of the 'Secured by Design' scheme in relation to crime prevention. - WODC should help to establish better management and maintenance of green spaces and support local involvement, where possible through Local Plan policies, to reduce anti-social behaviour which may discourage use of open spaces by the local community.	- CP6 is now CP4. Reference is made to open space and green infrastructure facilities; however, no specific examples are provided to clarify the types of facilities envisaged. - DM14 addresses residential uses within town centres. Residential development is supported where appropriate and where it would not undermine the amenity or character of the town centre. However, the recommendation to promote residential development in suitable town centre locations is not clearly reflected in the policy wording. - Further consideration should be given to crime prevention and community safety within DM14. Whilst the policy prioritises pedestrian and cyclist safety, there is limited reference to designing out crime or creating safe and secure environments. DM20 (Affordable Housing) includes a requirement for family homes to be located within safe walking distance of a primary school. Policies relating to travelling communities require safe access to highway networks, necessary utilities, outdoor amenity space and, in particular, child-friendly areas. However, the recommendation to integrate crime prevention and safety considerations into the design of development has not been fully actioned, and

SA Objective	Recommendations made in the Regulation 18 Preferred Policy Stage	Actioned
		further reference to crime prevention and community safety should be included.
SA Objective 10: Health and wellbeing	- The Local Plan objectives would benefit from further wording on healthcare facilities, particularly outlining what healthcare infrastructure could be provided and addressing potential capacity issues arising from the limited emergency healthcare services currently available in the district. - Developers, residents, landowners and managers of open spaces should be encouraged to adopt a cooperative approach that connects buildings, gardens and public spaces to create a vibrant and diverse network of interconnected species and habitats. Such a network would enhance the quality of life for local residents. - The Local Plan should further emphasise the health implications of air pollution and strive to minimise the exposure of residents, and particularly vulnerable groups, to existing sources of air pollution through careful consideration of the location, design and configuration of new developments and particularly those close to roads.	- The recommendation has not been actioned. Whilst the Vision refers to access to high-quality healthcare and mental health services, there is no specific policy provision relating to the delivery or protection of healthcare facilities. References within Objective 2 are limited to infrastructure provision in general terms and do not explicitly address healthcare infrastructure. - The recommendation has not been actioned. No corresponding policy changes or additional provisions have been identified within the Plan. - The recommendation has been partially actioned. The supporting text to DM13 now recognises the effects of air pollution on human health and includes consideration of factors such as location, design and proximity to roads. However, this recognition is not carried through into the policy wording itself. Specific reference to the protection of human health from the effects of air pollution should be included within the policy to fully address the recommendation.
SA Objective 11: Transport and accessibility	- The Local Plan should ensure proposed sites for Gypsies, Travellers and Travelling Showpeople seek to provide suitable access to local services, healthcare and schools to facilitate sustainable development and integration with the community. This could include measures such as developing travel plans to improve public transport connections. The layout and design of new sites should be carefully considered with reference to good practice guidance. - Residential uses in town centres such as above retail areas should be promoted where appropriate, to help ensure that residential development is situated in closer proximity to existing services and facilities to meet day to day needs, reducing the need to travel. - Where new active travel links are to be provided, these should be well designed so vulnerable groups can travel in confidence; this could include consideration of lighting schemes, overlooking and appropriate vegetation to avoid concealed spaces. - The Local Plan should explicitly support the 20-minute neighbourhood concept when designing and implementing active travel routes, or when considering growth located in strategic development sites or new settlements.	- This recommendation has been actioned in DM24. Explicitly references sites being located in close proximity (5km) to a range of services and facilities, particularly healthcare and education. Also be easily accessible to a highway network with larger sites including arrangement for proper site management to ensure cohesion between travelers and non-travelers. Specific reference should be given to design criteria. - DM14 addresses residential uses within town centres. Residential development is supported where appropriate and where it would not undermine the amenity or character of the town centre. However, the recommendation to promote residential development in suitable town centre locations is not clearly reflected in the policy wording. - Recommendation has been actioned, with specific reference to segregated walking and cycling paths for all users including those more - Recommendation has not been actioned. Mention of the 20-minute neighbourhood concept in the glossary but not in the policy text.
SA Objective 12: Education	- More direct reference to education, such as supporting sustainable access to schools and training opportunities to maintain high skill levels would strengthen the performance of the Local Plan vision. Furthermore, a clearer definition of what is meant by 'smart technologies' would prevent any misinterpretations, ensuring the term is used in the right context. - The Local Plan objectives would benefit from including stronger wording regarding technological provisions to address existing problems such as poor digital connectivity across the district. Furthermore, it is recommended that the objectives include wording on educational facilities, ensuring that population growth does not place pressure on existing schools.	- The Local Plan vision outlines a "focus on skills, development and lifelong learning", however the recommendation of making more direct reference to sustainable access to schools and training opportunities has not been actioned. - The definition of 'smart technologies' has not been clarified, however it is noted that they are supported by digital infrastructure. - Recommendation has been partially actioned. Objective 6 mentions ensuring that all residents benefit from improved education opportunities. However, no direct wording is used in reference to capacity of educational facilities. Furthermore, although Objective 6 refers to ensuring that economic assets are provided with the necessary infrastructure, the Local Plan Objectives do not make direct

SA Objective	Recommendations made in the Regulation 18 Preferred Policy Stage	Actioned
		reference to improving technological provision or digital connectivity across the district.
SA Objective 13: Economy and employment	Opportunities should be explored in the Local Plan policies to achieve smart economic growth. This could be encouraged through the use of technology and innovative ways of working to increase productivity without damaging people's quality of life or the environment.	Recommendation Actioned. DM31: Supporting Digital Infrastructure for Home and Co-Working encourages use of technology and home working.
General points	Policy CP2 (Settlement Hierarchy) could be merged with Policy CP3 (Spatial Strategy) to ensure clarity in the purpose and intention of defining a settlement hierarchy, for example in ensuring that appropriate types and scales of new development are directed to each type of settlement.	Recommendation has not been actioned. These policies now comprise policies SP1 and SP2 respectively.

19 Conclusions

19.1 Residual effects following mitigation

- 19.1.1 The SA has assessed the site allocations and policies proposed in the Regulation 19 version of the West Oxfordshire Local Plan using the methodology in **Chapter 4** and assumptions as set out in **Appendix D**. A range of sustainability effects have been identified, which are highlighted throughout the policy and site assessments in **Appendices F and G**, with residual positive, negligible and negative effects summarised and discussed in **Chapters 7 to 15**.
- 19.1.2 Proposals in the Local Plan vary in terms of their sustainability performance with likely positive effects expected on some SA Objectives and adverse effects on others. The SA has identified likely sustainability effects of the Local Plan proposals alone and in combination.
- 19.1.3 The West Oxfordshire Local Plan is anticipated to result in a range of positive and negative effects on sustainability, which are summarised in **Tables 19.1 and 19.2**.
- 19.1.4 The mitigation proposals presented in the Local Plan provide positive planning mechanisms for delivering sustainable development where the Plan is able to reasonably address the issue. It is recognised that the Plan cannot fully address the sustainability effects of national and international trends, such as increased frequency of storm events associated with climate change.

Table 19.1: Likely residual positive sustainability effects of the West Oxfordshire Local Plan

Summary of residual positive effects	
	Housing provision
1	The Local Plan is expected to result in a long-term positive effect through the delivery of 18,318 new homes, providing sufficient housing land to meet identified needs and supporting the delivery of a range of housing types and tenures.
	Employment provision
2	The Local Plan is expected to result in a long-term positive effect through the provision of sufficient employment land to support economic growth, job creation and investment within West Oxfordshire.
	Access to services and facilities
3	The Local Plan is expected to support improved access to local services and facilities through the delivery of new development, associated infrastructure investment and developer contributions.
	Health and wellbeing
4	The Local Plan is expected to have a positive effect on health and wellbeing through the provision of new green infrastructure, recreational opportunities and improvements to walking, cycling and sustainable transport networks.
	Green infrastructure provision
5	The Local Plan is expected to have a positive effect through the delivery of new and enhanced green infrastructure, supporting recreational access, biodiversity enhancement and climate resilience.
	Climate change adaptation
6	The Local Plan is expected to support improved resilience to climate change through policies relating to sustainable design, flood risk management, sustainable drainage and the protection and enhancement of green and blue infrastructure.

Summary of residual positive effects	
7	Sustainable transport The Local Plan is expected to support improvements in sustainable transport through the promotion of walking, cycling and public transport infrastructure, helping to reduce reliance on private vehicles over the longer term.

Table 19.2: Likely residual adverse sustainability effects of the West Oxfordshire Local Plan

Summary of residual adverse effects	
1	Habitat fragmentation The Local Plan is expected to result in a significant long-term cumulative adverse effect on biodiversity due to the loss and fragmentation of habitats, increased recreational pressure and potential impacts on ecological networks. Mitigation and biodiversity net gain are unlikely to fully offset all cumulative impacts.
2	Landscape character and visual amenity The Local Plan is expected to result in a long-term cumulative adverse effect on landscape through the introduction of development into rural areas, affecting landscape character, tranquillity and views, particularly within sensitive landscapes and areas close to the Cotswolds National Landscape.
3	Cultural heritage The Local Plan is expected to result in a moderate and potentially long-term cumulative adverse effect on cultural heritage. New development has the potential to alter the setting of designated and non-designated heritage assets and contribute to incremental changes in historic landscape character.
4	Climate change mitigation The Local Plan is expected to result in a long-term cumulative adverse effect on climatic factors through increased greenhouse gas emissions associated with construction, energy use and transport, alongside the loss of greenfield land and carbon storage functions.
5	Soil resources The Local Plan is expected to result in a long-term permanent adverse effect through the loss of previously undeveloped land and potential best and most versatile agricultural land. Opportunities to mitigate soil loss are limited due to the irreversible nature of development.
6	Air quality The Local Plan is expected to result in a short to medium-term cumulative adverse effect on air quality due to increased traffic flows and associated emissions, particularly around areas of existing air quality constraints and the strategic road network.
7	Water resources and water quality The Local Plan is expected to result in a long-term cumulative adverse effect on water resources and water quality due to increased demand for water supply and wastewater treatment capacity. Delivery of infrastructure improvements and mitigation measures will be important in managing these effects.
8	Waste management The Local Plan is expected to result in increased pressure on waste management infrastructure due to additional waste generation associated with population growth, with potential capacity constraints resulting in a medium-term adverse effect.
9	Accessibility to services and facilities The Local Plan may result in localised adverse effects where development is located in areas with limited access to existing services and facilities, particularly in rural locations where sustainable transport options are constrained.

19.2 Consultation and next steps

- 19.2.1 This report represents the latest stage of the SA process. As per Regulation 13 of 'The Environmental Assessment of Plans and Programmes Regulations 2004'¹⁴⁶, this Regulation 19 SA Report will be published alongside the Publication Version of the Plan. Consultation findings will be used to inform subsequent stages of the SA process.
- 19.2.2 A six-week period of consultation under the Town and Country Planning Act will be undertaken by WODC to offer individuals, stakeholders and other organisations an opportunity to submit representations regarding the West Oxfordshire Local Plan.
- 19.2.3 Following this round of consultation, all comments will be analysed by the plan makers as part of the ongoing plan making process. Further stages of SA will be prepared if and when necessary.

¹⁴⁶ The Environmental Assessment of Plans and Programmes Regulations 2004. Regulation 13: Consultation procedures. Available at: <https://www.legislation.gov.uk/uksi/2004/1633/regulation/13/made> [Date accessed: 25/03/26]

Habitats Regulations Assessment

Sustainability Appraisal

Strategic Environmental Assessment

Landscape Character Assessment

Landscape and Visual Impact Assessment

Green Infrastructure

Expert Witness

Ecological Impact Assessment

Habitat and Ecology Surveys

Biodiversity Net Gain



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