

# Strategic Environmental Assessment (SEA) for the Garsington Neighbourhood Plan

**Environmental Report** 

March 2022

### Quality information

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# **Non-Technical Summary**

AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Garsington Neighbourhood Plan (GNP).

The GNP is being prepared by a by a working party, comprising residents and members of Garsington Parish Council, under the Neighbourhood Planning Regulations 2012 and in the context of the South Oxfordshire Local Plan adopted in 2020. Once 'made' the GNP will have material weight when deciding on planning applications, alongside the South Oxfordshire Local Plan.

SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. Central to the SEA process is publication of an Environmental Report alongside the draft plan that presents certain required information. The aim is to inform the consultation and, in turn, plan finalisation.

Preparing the Environmental Report essentially involves answering three questions:

- 1) What has plan-making / SEA involved up to this point?
  - including in relation to 'reasonable alternatives'.
- 2) What are the SEA findings at this stage?
  - i.e. in relation to the draft plan.
- 3) What happens next

### **This Environmental Report NTS**

This is the Non-Technical Summary (NTS) of the Environmental Report for the GNP, in which the three questions are answered in turn. Firstly, there is a need to set the scene further by answering the question: What's the scope of the SEA?

# What is the scope of the SEA?

The scope of the SEA is reflected in a list of topics and objectives, which, taken together indicate the parameters of the SEA and provide a methodological 'framework' for assessment. The SEA framework is presented below:

Table A: The SEA framework

SEA theme	EA theme SEA objective		
Biodiversity	Protect and enhance biodiversity and geodiversity sites and features, by avoiding impacts on the integrity of European designated sites and delivering demonstrable biodiversity net gains locally.		
Climate change	Reduce the contribution to climate change made by activities within the Neighbourhood Plan area		
Climate change	Support the resilience of the Neighbourhood Plan Area to the potential effects of climate change, including flooding		
Health and wellbeing	Improve the health and wellbeing of residents within the Neighbourhood Plan Area.		
Historic environment	Protect, conserve and enhance the historic environment within and surrounding the Neighbourhood Plan area		
Landscape	Protect and enhance the character and quality of the immediate and surrounding landscape, including the AONB and its setting.		
Land soil and	Ensure the efficient and effective use of land.		
Land, soil and water resources	Protect and enhance water quality and use and manage water resources in a sustainable manner.		
Population and communities	Ensure growth in the Parish is aligned with the needs of all residents and capacity of the settlement and social infrastructure, improving accessibility, anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.		
Transportation	Promote sustainable transport use and reduce the need to travel.		

# Plan making/SEA up to this point

An important element of the required SEA process involves assessing **reasonable alternatives** in time to inform development of the draft plan, and then publishing assessment findings in the Environmental Report.

As such, Part 1 of this report explains how work was undertaken to develop and assess a 'reasonable' range of alternative approaches to the allocation of land for affordable housing, or **growth scenarios**.

The process of arriving at affordable housing scenarios involved a process of considering both the strategic context and aims/objectives, alongside understanding of the sites available and in contention for allocation. The process is set out in Section 5, and summarised in a flow diagram.

Five affordable housing scenarios were ultimately identified for assessment:

- Scenario 1: Site 1 (Down's Farm; 1.3 ha)
- Scenario 2: Site 2a (City Farm; 1.7 ha)
- Scenario 3: Site 10 (Yeates Plot; 2 ha)
- Scenario 4: Site 13 ("Part of SHELAA site 865"; 1 ha)
- Scenario 5: Site 865 (East of Kiln Lane; 2.5 ha)

Table B presents the assessment. Presented subsequently is the Neighbourhood Plan Working Party's response to the assessment, i.e. reasons for supporting the preferred growth scenario, which is Scenario 1.

### Assessment methodology:

Within each row of Table B (i.e. for each of the topics that comprise the SEA framework) the columns to the right hand firstly rank the scenarios in order of preference and then, secondly, highlight instances of a predicted positive (green), minor positive (light green), minor negative (amber) or negative (red) significant effect on the baseline. Also, '=' is used to denote instances where the alternatives perform on a par (i.e. it not possible to differentiate between them).

Table B: Affordable housing scenarios assessment findings

Topic	Scenario 1 Site 1	Scenario 2 Site 2a	Scenario 3 Site 10	Scenario 4 Site 13	Scenario 5 Site 865
Biodiversity	2			2	2
Climate change	=	=	=	=	=
Historic environment	=	=	=	=	=
Health	1	1	1	1	2
Landscape	1	3	2	2	2
Land, soil & water resources	1	2	2	2	2
Population & community	2	2	2	1	
Transportation	=	=	=	=	=

**AECOM** Non-technical Summary

#### **Discussion**

The assessment shows a mixed picture, with each of the sites / scenarios associated with pros and cons. Scenario 1 stands out as performing well in respect of the most topics (three); however, there is a concern regarding footpath access, and there is a question-mark regarding its ability to deliver all 16 of the affordable homes required. Scenarios 3 and 4 also perform relatively well, in that each performs best in respect of two objectives, and neither stands-out as performing particularly poorly in respect of any topic. However, both Scenarios 3 and 4 are associated with draw-backs, which the Parish Council might choose to give particular weight to, when balancing competing topics/objectives.

Having made these initial points, the following bullet points consider the merits of the growth scenarios under each of the topic headings in turn:

- **Biodiversity** there are limited sensitivities within the Parish, with primary considerations being: two closely related patches of priority woodland habitat near to Site 1 (albeit it is important to note this site includes previously developed land); mature hedgerows (shown on early maps), notably affecting Sites 13 and 865; the historic landscaped grounds of Garsington Manor; and mature residential gardens. On this basis, Sites 1, 13 and 865 are considered to be subject to a degree of constraint.
- Climate change the key consideration here is climate change adaptation, and in particular the need to avoid areas of flood risk. None of the sites in question are subject to fluvial flood risk; however, a surface water flood risk channel affects a small part of Site 865. The area of flood risk is at the western extent of the site, and would presumably not affect the point of access (to the north of the site), hence this constraint is not considered to be significant, and the scenarios are ranked on a par.
  - N.B. in respect of climate change mitigation, the key consideration is greenhouse gas emissions from transport, which is a focus of discussion below, under 'Transport'.
- **Health** a primary consideration is that Site 865 is considered by the Parish Council to meet the criteria for Local Greenspace Designation, with the Draft Neighbourhood Plan explaining: "In continual use by local residents seeking relaxation in a rural idyll, as well as those wanting open space for play, or simply going for a walk." It is not possible to differentiate between the other sites with any certainty.
- **Historic environment** none of the sites are in proximity to a designated historic asset, although it is noted that City Farm (Site 2a) is shown on the earliest available map (1886). There is a need to give consideration to wider historic character; however, these are matters for discussion below, under the 'Landscape' heading. As such, the scenarios are ranked on a par.
  - N.B. the Oxfordshire Historic Environment Record (HER) lists 58 records for the Parish; however, these records are not mapped, and so it is not possible to draw on the HER.
- Landscape is a key issue for this current assessment.

Beginning with the cluster of three sites associated with Wheatley Road, to the northeast of the village core, all are associated with raised land, hence there is a need to consider views to and from lower lying land. Of the three sites, Site 1 is likely to be subject to the least constraint, particularly given the existing built form (chicken sheds), and there could also be a degree of screening provided by hedgerows and the nearby woodland patches. In contrast, Site 2a and Site 10 comprise arable fields and are likely to contribute positively to the rural landscape. In particular, Site 2a could be significantly constrained in landscape terms, noting: the adjacent Oxford Green Belt Way; the possibility of long distance views towards Oxford; and little or no field boundary at the northern edge of the site. Google Street View suggests long distance views of Shotover Hill.

The final two sites are associated with the main built form of the village, which, broadly speaking, is 'a positive' in landscape terms. Beginning with Site 865, this site is potentially quite well contained within the landscape; however, it is publicly accessible and there is a very dense network of public footpaths intersecting and nearby to the site (including following higher ground), such that it is likely to have a degree of landscape value. Moving on to Site 13, it was identified by the Green Belt Study (2015) as "reflecting few functions of the Green Belt", and is associated with built form on two sides and a mature hedgerow on the third and final side (such that development might achieve a 'rounding-off'); however, there is a footpath adjacent, the site is visible from the Oxford Road and this part of the village is sensitive in landscape terms due to the proximity of Northfield. Even if the view is taken that the site does not contribute significantly to the landscape gap between the village and Northfield, it remains the case that there are arguments for a low density built form in this part of the village, e.g. linear built form similar to that currently found on the opposite side of the road.

In conclusion, Site 2a is considered likely to be subject to the greatest landscape constraint, and Site 1 the least constraint, whilst it is not possible to differentiate the other three sites with any confidence. It is appropriate to flag a notable concern regarding Site 2a, also noting the feasibility that it could come forward in combination with one or both of Sites 1 and 10, leading to urbanisation of sensitive raised land on the Oxford fringe.

- Land, soil & water resources the first point to note is that Site 1 benefits from significant previously developed land on site. The other four sites are either in productive agricultural use, or have the potential to be (at least for pasture), and there is no potential to differentiate between the sites according to agricultural land quality with any certainty (most agricultural land in this area is likely to be of 'best and most versatile' quality). As such, the remaining four sites are judged to perform on a par.
- **Population & community** the primary consideration is delivery of affordable housing, and, in this respect, there is a need to highlight Site 1 as performing well, on the basis that the landowners have expressed an interest in developing their land in such a way as to ensure the long-term availability of affordable housing for the village. This could be achieved by using a charitable trust possibly, with the involvement of a housing association. On this basis, the site could potentially deliver all of the required affordable housing, despite being the second smallest of the five sites assessed. Site 13 could potentially prove too small to deliver the required number of affordable homes.

A further important consideration is the ability to easily access village facilities, noting SODC Local Plan Policy H10, which states that affordable housing exception sites must "not form an isolated development and have access to local services and facilities". In this respect, there is a concern regarding footpath access to and from the three sites to the northeast of the village, as the footpath along Wheatley Road narrows at one point, and then ends at the point where Sites 2a and 10 begin. There is the potential to extend the footpath. However, the costs involved could lead to pressure for market housing to enable delivery of the required affordable housing.

In conclusion, it is considered appropriate, on balance, to highlight a preference for the sites that relate best to the village core, with existing safe footpath access to facilities.

• Transport – the key transport consideration is the potential to walk and cycle to village facilities, which has also been discussed above. A further consideration is the need to support good access to the bus service to Oxford, which passes through the village centre. In this respect, it is again the case that the cluster of three sites to the northeast of the village core are not ideally located. A final consideration is safe vehicular access; however, in this respect, none of the sites/scenarios under consideration are known to be subject to any issues or constraint. In conclusion, the issues/effects here are as per those discussed above, under 'Population and community', hence it is considered appropriate to rank the alternatives on a par, to avoid double counting of effects.

The Steering group responded to the growth scenarios assessment is as follows:

"The preferred approach is to support Site 1 (Downs Farm), which is shown to perform relatively well through the assessment, including because of the currently developed nature of the site, which is a factor that the Working Party gives particular weight to. A further key reason for supporting this site is the landowner's expressed interest in developing their land in such a way as to ensure the long-term availability of affordable housing for the village.

The assessment highlights a concern regarding walking connectivity between the site and the village centre. However, access is considered to be suitable by the Working Party, assuming extension of the footpath along Wheatley Road.

The Working Party considered two other sites along Wheatley Road, to the northeast of the village, namely Sites 2 and 10. However, these sites perform poorly, relative to Site 1. In particular, development of Site 2a would impact on a sensitive landscape. As for Site 10, this site performs poorly, relative to Site 1, as it comprises productive agricultural land, and development would also lead to a landscape impact.

The two sites that are more closely associated with the village centre are judged to perform relatively poorly. With regards to Site 13, which the assessment suggests has a degree of merit, development is strongly opposed on the grounds of its proximity to the Northfield Local Plan allocation, plus it might not be possible to viably deliver the required number of affordable homes. With regards to Site 865, development is strongly opposed as the site is considered to meet the criteria for Local Green Space designation."

# Assessment findings at this stage

Part 2 of the Environmental Report presents an assessment of the GNP as a whole, as it stands at the current time (consultation on the pre-submission plan).

Assessment findings are presented as a series of narratives under the SEA framework. The assessment reaches the following overall conclusions:

"Overall, the only effects of significance anticipated to emerge in implementation of the plan are considered likely to be positive. This predominantly relates to the delivery of affordable housing and smaller homes to meet locally identified needs. Minor positive effects are also anticipated in relation to health and wellbeing, given the policy emphasis placed on active travel connections in new development.

Broadly neutral effects are concluded in relation to biodiversity, climate change, land, soil and water resources, landscape, the historic environment and transportation, reflecting the overall conclusion that there will be no significant deviation from the baseline for these SEA themes.

It is recognised that recommendations could be made to expect more from development proposals in terms of their sustainability performance, or contribution to improving the environment and accessibility. However, this needs to be considered in the context of the Plan, which seeks affordable housing development only. Increasing the requirements placed on development in this respect, will ultimately reduce the viability of development proposals for affordable units in perpetuity."

## **Next steps**

This Environmental Report accompanies the pre-submission version of the GNP for consultation.

Following consultation, any representations made will be considered by the Neighbourhood Plan Steering Group, when finalising the plan for submission.

The 'submission' version of the plan will then be submitted to South Oxfordshire District Council (alongside an Environmental Report Update, if necessary). The plan and supporting evidence will be published for further consultation, and then submitted for Independent Examination.

At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.

If the subsequent Independent Examination is favourable, the GNP will be subject to a referendum, organised by South Oxfordshire District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the GNP will become part of the Development Plan for South Oxfordshire District, covering the defined Neighbourhood Plan Area.

# 1. Introduction

# **Background**

- AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Garsington Neighbourhood Plan (GNP).
- The GNP is being prepared by a working party, comprising residents and members of Garsington Parish Council, under the Neighbourhood Planning Regulations 2012 and in the context of the South Oxfordshire Local Plan adopted in 2020. Once 'made' the GNP will have material weight when deciding on planning applications, alongside the South Oxfordshire Local Plan.
- 1.3 SEA is a required process for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects.<sup>1</sup>

# **SEA** explained

- It is a requirement that the SEA process is undertaken in-line with the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.5 In-line with the Regulations, a report (known as the Environmental Report) must be published for consultation alongside the draft plan that "identifies, describes and evaluates" the likely significant effects of implementing "the plan, and reasonable alternatives".2 The report must then be taken into account, alongside consultation responses, when finalising the plan.
- More specifically, the Report must answer the following three questions:
  - 1. What has plan-making / SEA involved up to this point?
    - including in relation to 'reasonable alternatives'.
  - 2. What are the SEA findings at this stage?
    - i.e. in relation to the draft plan.
  - 3. What happens next?

### **This Environmental Report**

- This report is the Environmental Report for the GNP. It is published alongside the 'Pre-submission' version of the plan, under Regulation 14 of the Neighbourhood Planning Regulations (2012, as amended).
- This report answers questions 1, 2 and 3 in turn, to provide the required 1.8 information.<sup>3</sup> Each question is answered within a discrete 'part' of the report.
- However, before answering Q1, two further introductory sections are presented to further set the scene.

Introduction **AECOM** 

<sup>&</sup>lt;sup>1</sup> Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: A) an environmental report; or, B) a statement of reasons why SEA is not required, prepared following a 'screening' process. The GNP was subject to screening in 2021, on the basis of which it was determined that there is a requirement for SEA (i.e. the plan was 'screened-in').

<sup>&</sup>lt;sup>2</sup> Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004.

<sup>&</sup>lt;sup>3</sup> See **Appendix A** for further explanation of the report structure including its regulatory basis.

# 2. What is the plan seeking to achieve?

## Introduction

2.1 This section considers the context provided by the South Oxfordshire Local Plan before setting out the established Neighbourhood Plan vision and objectives. **Figure 2.1** (at the end of this section) presents the plan area.

# Strategic planning policy context

- 2.2 Garsington is defined as a 'smaller village' by the Local Plan, such that key context is provided by the following policies:
  - STRAT1 (Overall Strategy) the overall strategy is to support smaller villages by "allowing for limited amounts of housing and employment to help secure the provision and retention of services."
    - The supporting text also explains: "We are directing development to the Larger Villages to complement the spatial strategy and will support those Neighbourhood Development Plan groups who wish to promote development in the Smaller Villages."
  - H1 (Delivering New Homes) recognises that small housing sites will be
    allocated in Neighbourhood Development Plans over-and-above those
    allocations already in place at the time of plan-finalisation, but does not set
    out any expectation regarding the number of homes that will come forward in
    this way (see Table 4c Expected sources of housing supply, noting that
    allocations through a Neighbourhood Plan are distinct from windfall sites).
  - H8 (Housing in the Smaller Villages) is of central importance, and hence is set out in full in Box 2.1.

#### Box 2.1: South Oxfordshire Local Plan Policy H8: Smaller Villages

#### **Policy**

- "1. The Council will support development within the Smaller Villages in accordance with Policy H16. Where a Parish Council wishes to prepare a Neighbourhood Development Plan and make housing allocations within it to support further growth, the Council will support this.
- 2. Those Neighbourhood Development Plans will need to demonstrate that the level of growth they are planning for is commensurate to the scale and character of their village, and this is expected to be around a 5% to 10% increase in dwellings above the number of dwellings in the village...
- 3. Neighbourhood Development Plans allocating sites on greenfield sites in these locations should consider how development can meet the bespoke needs of their village, including housing mix, tenure and the amount of affordable housing."

### Supporting text

"Smaller Villages, as defined in the settlement hierarchy (Appendix 7), have no defined requirement to contribute towards delivering additional housing (beyond windfall and infill development) to meet the overall housing requirement of South Oxfordshire... However some parishes may still wish to proceed with preparing a Neighbourhood Development Plan for example to... to identify a specific type of housing bespoke to their village's needs. The Council's strategy therefore allows them to do so, provided that the levels of growth are commensurate to the size of the village.

Proposals in a Neighbourhood Development Plan must be in conformity with the strategic policies in this Plan, and policies in the NPPF. This Local Plan does not set down a requirement for Smaller Villages in the Green Belt to deliver additional housing and as such, Smaller Villages would not be expected to propose alterations to the Green Belt through Neighbourhood Development Plans."

- 2.3 Finally, it is important to note that Garsington is specifically discussed within two policies of the Local Plan, namely:
  - STRAT11 (Land South of Grenoble Road), which deals within a strategic allocation for 3,000 homes and 10 ha of employment land; and
  - STRAT12 (Land at Northfield), which deals with a strategic allocation for 1.800 homes.
- 2.4 Garsington is in proximity to these sites, such that policy sets out to mitigate concerns around visual impact and maintaining a permanent landscape gap between Garsington and Oxford.

# **GNP** objectives

### **Discussion**

- 2.5 The GNP is being prepared with quite specific objectives, which are set out clearly in Section 1 ("Introduction to the Plan") and Section 2 ("Background, Vision and Objectives") of the Draft Plan document.
- 2.6 In particular, Section 2.2 of the Draft Plan explains:
  - "The primary aim of this Neighbourhood Plan is to set out support for limited development within the village that will meet the identified need for affordable housing, sensitively delivered such that it protects the environment and ensures the residential mix is maintained over the next 20 years."
- 2.7 This 'primary aim' reflects the findings of a Residents Survey and a Housing Needs Assessment, both completed in 2018, which served to highlight very strong local support for new affordable housing in the Parish.
- 2.8 Careful consideration has been given to the question of precisely how the GNP can best support "limited development within the village that will meet the identified need for affordable housing." Garsington is entirely washed over by the Oxford Green Belt, which is in place to restrict development, and there is no potential for the Neighbourhood Plan to remove land from the Green Belt (see Box 2.1, read in the context of NPPF paragraph 136).
- 2.9 However, there is the potential for the Neighbourhood Plan to set a policy framework that would apply to any applications for affordable housing schemes in the Green Belt which might be submitted to SODC under:
  - NPPF paragraph 145 (which deals with 'proposals affecting the Green Belt'), which states: "A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are... f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites)"...; and
  - SODC Local Plan Policy H10 (Exception Sites and Entry Level Housing Schemes), which states: "Small-scale affordable housing schemes will be permitted outside settlements, provided that [criteria are met]".

- 2.10 The question is in respect of the type of policy framework that should be set. One option is to set policy criteria under thematic headings (for example, 'landscape', 'accessibility') that apply to the plan area as a whole, and would be taken into account as part of any planning application for an exception site under Local Plan Policy H10. However, the Neighbourhood Plan Working Party has decided that it is appropriate to take a more proactive approach.
- 2.11 Specifically, the proposal is to identify where, within the plan area, there is support in principle for an application for new affordable housing (under Local Plan Policy H10), and then to set thematic policy criteria to guide any such application(s), thereby supplementing the criteria set out in Policy H10 (and policies set out elsewhere in the Local Plan, e.g. on environmental protection).
- 2.12 As such, a key aim of the GNP is to identify one or more locations where applications for affordable housing schemes, under Local Policy H10, would be supported, subject to criteria being met. These locations can be considered 'sites', and support for a particular site through the GNP can be considered an 'allocation'. However, it is important to be clear that any planning application on an allocated site would only ever be permitted by SODC as an 'exception'.

### The objectives

- 2.13 The GNP objectives are as follows:
  - Protect the rural nature of the village.
  - · Identify the need for affordable housing.
  - Set out criteria against which potential sites for affordable housing development, would be assessed.
  - Allocate a site for affordable housing.
  - Set out desirable enhancements to the village's community facilities and environmental assets such as green-spaces, foot and cycle-paths.

# 3. What is the scope of the SEA?

## Introduction

3.1 The aim here is to introduce the reader to the scope of the SEA, i.e. the sustainability topics and objectives that should be a focus of the assessment of the plan and reasonable alternatives. Appendix B presents further information.

### Consultation

3.2 The SEA Regulations require that "when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies". In England, the consultation bodies are the Environment Agency, Historic England, and Natural England.<sup>4</sup> As such, these authorities were consulted in April 2021.

### The SEA framework

3.3 Table 3.1 presents a list of topics and objectives that together form the backbone of the SEA scope. Together they comprise a 'framework' under which to undertake assessment.

Table 3.1: The SEA framework

SEA theme	SEA objective
Biodiversity	Protect and enhance biodiversity and geodiversity sites and features, by avoiding impacts on the integrity of European designated sites and delivering demonstrable biodiversity net gains locally.
Climato chango	Reduce the contribution to climate change made by activities within the Neighbourhood Plan area
Climate change	Support the resilience of the Neighbourhood Plan Area to the potential effects of climate change, including flooding
Health and wellbeing	Improve the health and wellbeing of residents within the Neighbourhood Plan Area.
Historic environment	Protect, conserve and enhance the historic environment within and surrounding the Neighbourhood Plan area
Landscape Protect and enhance the character and quality of the immedia surrounding landscape, including the AONB and its setting.	
Land, soil and	Ensure the efficient and effective use of land.
water resources	Protect and enhance water quality and use and manage water resources in a sustainable manner.
Population and communities	Ensure growth in the Parish is aligned with the needs of all residents and capacity of the settlement and social infrastructure, improving accessibility, anticipating future needs and specialist requirements, and supporting cohesive and inclusive communities.
Transportation	Promote sustainable transport use and reduce the need to travel.

<sup>&</sup>lt;sup>4</sup> These consultation bodies were selected "by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes" (SEA Directive, Article 6(3)).

# Part 1: What has plan-making/ SEA involved to this point?

# 4. Introduction (to Part 1)

### **Overview**

- 4.1 Work on the GNP has been underway since 2017/18; however, the aim here is not to provide a comprehensive explanation of work to date.
- 4.2 Rather, the aim is to explain work undertaken to develop and appraise reasonable alternatives in 2021.
- 4.3 More specifically, this part of the report presents information on the consideration given to reasonable alternative approaches to addressing a particular issue that is of central importance to the plan, namely the allocation of land for affordable housing, or **affordable housing scenarios**.

### Why focus on affordable housing scenarios?

4.4 The decision was taken to develop and assess reasonable alternatives in relation to the matter of affordable housing scenarios in light of the Plan objectives (see para 2.10), and because there is the likelihood of being able to differentiate between the merits of alternatives/scenarios in respect of 'significant effects'. National Planning Practice Guidance is clear that SEA should focus on matters likely to give rise to significant effects.

### Who's responsibility?

- 1.1 It is important to be clear that:
  - Defining scenarios is ultimately the responsibility of the plan-maker, although the SEA consultant (AECOM) is well placed to advise.
  - Assessing scenarios is the responsibility of the SEA consultant.
  - Selecting a preferred scenario is the responsibility of the plan-maker.

# Structure of this part of the report

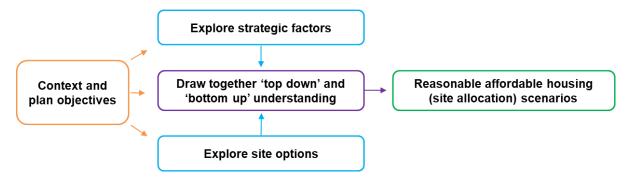
- 1.2 This part of the report is structured as follows:
  - Chapter 5 explains the process of defining scenarios:
  - Chapter 6 presents the outcomes of assessing scenarios;
  - Chapter 7 explains reasons for selecting the preferred scenario.

# 5. Defining scenarios

### Introduction

- 5.1 The aim here is to explain a process that led to the definition of a reasonable range of affordable housing scenarios for assessment, and thereby present "an outline of the reasons for selecting the alternatives dealt with".<sup>5</sup>
- 5.2 Specifically, there is a need to: **1)** explain strategic factors with a bearing on defining scenarios; **2)** discuss work completed to examine site options (i.e. sites potentially in contention for allocation); and then **3)** explain how the 'top down' and 'bottom up' understanding generated through steps (1) and (2) were married together in order to arrive at affordable housing scenarios.

Figure 5.1: Defining scenarios



# **Strategic factors**

- 5.3 The aim of this section is explore the strategic factors with a bearing on the establishment of reasonable affordable housing (site allocation) scenarios. Specifically, this section of the report explores:
  - Quantum how many new affordable homes are needed?
  - Broad distribution broadly where is more/less suited to allocation?

#### Quantum

- 5.4 There is good evidence of affordable housing needs locally, through work completed in 2018, namely a Residents Survey and a subsequent Housing Needs Assessment (HNA) completed in 2018. In summary, the total need for affordable housing identified was 16 dwellings. This comprised 5 family units wanting to rent from a housing association and 11 family units wanting to buy through an affordable housing scheme. In addition, there is a need for dwellings that would enable downsizing, e.g. from a family home to a bungalow.
- 5.5 It is recognised that a large number of affordable homes will be delivered nearby to Garsington through the Northfield Local Plan allocation. However, these will not come forward for a number of years and, in any case, it is the view of the Group (in discussion with AECOM) that the needs of those with strong connections to the village would not be met fully by new housing at Northfield. This is particularly the case for the elderly and the less mobile.

<sup>&</sup>lt;sup>5</sup> Schedule 2(8) of the SEA Regulations.

### **Broad distribution**

- 5.6 There are a range of well-understood strategic spatial issues:
  - Green Belt the entire Parish is washed-over by the Green Belt, such that it
    is difficult to identify broad areas that contribute to the purposes of the Green
    Belt (NPPF para 134) to a greater or less extent. However, a Green Belt
    Study (2015) identified two sites (1 ha and 1.2 ha) as "reflecting few
    functions of the Green Belt" (although still reflecting certain functions).
  - Heritage a large part of the village core is designated as a conservation area, within which is a high density of listed buildings, including the grade 2\* listed parish church and grade 2\* listed Garsington Manor, which sits within a grade 2\* registered park/garden. There is also a nationally scheduled medieval stone cross in the centre of the village, close to the Three Horseshoes pub and the village war memorial.
  - Landscape whilst there are no formal landscape designations, Garsington is sensitive in landscape terms, given its location on a promontory of raised land. As explained in the Draft Plan document: "The village and parish command wonderful views of the surrounding countryside. Virtually the whole of the ridge of the Chilterns is visible, from Luton/Dunstable in the northeast to Henley/Reading in the southwest, forming the horizon for a large part of the outlook. To the west are the Baldons and to the northwest are views of Wytham Woods and the city of Oxford."
  - Public rights of way there is a high density of footpaths and bridleways, including the Oxford Green Belt Way, which links to Horspath and Shotover Hill to the north, and the Baldons to the south - valued locations from which to appreciate Oxford in its Thames Valley landscape setting.
  - Waste water treatment capacity is understood to be a constraint to growth locally, with the facility at Sandford experiencing regular capacity breaches, leading to untreated sewage being discharged to the Thames.
  - Village form the bulk of village facilities are located within the village conservation area, namely the church, village hall and pub. The primary school is then located adjacent to the east of the conservation area, amongst a small area of 20<sup>th</sup> Century housing. Further built form is then associated with several roads emanating out from the village centre:
    - Oxford Road (northwest) adjacent to the north of the conservation area core is an area of 20<sup>th</sup> century housing (centred on a listed farmhouse), referred to on the OS map as 'Blenheim', but considered simply part of Garsington. There is a small shopping parade, and an accessible greenspace known as Parsler's Piece.
    - Wheatley Road (north) a very small landscape gap separates the core of the village from an area of linear built form along the Wheatley Road. Along this road are five farms, each associated with farm buildings, workshops, yards etc, and this road is also notably associated with the ridgeline and the Oxford Green Belt Way. There is a footpath along most, but not all, of the road (discussed further below).
    - Denton Lane (east) this road passes downhill and is associated with little built form. The village playground and sports club are located here.

- Southend (south) there is linear built form for several hundred metres beyond the village core, as the lane passes downhill, including several listed buildings, with distant views of the Chilterns also of note.
- Pettiwell (west) is an attractive narrow lane, again passing quite steeply downhill, and associated with a notable cluster of listed buildings.
- Local sentiment surveys of local residents, including as part of preparing a village plan in 2014, have revealed a number of priority issues. There is very strong support for remaining 'separate' from Oxford, and also strong support for new housing to come forward at "small sites scattered through the Parish" (although the survey did not define 'small'). Another priority issue is maintaining facilities, with recent years having seen the loss of two pubs and the village shop.

# **Site options**

- 5.7 As a starting point, and an input to the site selection and SEA process, AECOM completed a Site Options Assessment (SOA) in 2021.
- 5.8 The SOA examined 25 site options, finding 16 to be unsuitable for development. These sites are assigned a **red** status in the SOA.
- 5.9 Of these 16 sites red sites, the reasons for ruling-out 12 are considered to be clear cut. Firstly, seven sites are far too large, in light of the need to deliver 16 affordable homes. Secondly, three sites (sites 11, 352 and 933) are not available for development. Thirdly, three sites (sites 2b, 4 and 44) are poorly related to the existing built form of the village.
- 5.10 This leaves three red sites that warrant more detailed consideration:
  - Site 3 (Pye Fields) benefits from close proximity to the village core, and a
    degree of containment in the landscape, but is ruled out by the SOA primarily
    on the grounds of problematic access, with onsite surface water flood risk
    and mature vegetation also of note. A further consideration is the desire to
    maintain a low density built form in this northern part of the village, given
    proximity to the Northfield Local Plan allocation.
  - Site 5 (Scholarswell Farm) is one of two sites identified as making a limited contribution to the purposes of the Green Belt (see para 5.6, above), and benefits from relatively good proximity to village facilities; however, it constrained in access terms and, regardless, not available for development.
  - Site 12 (Land between Denton Lane and Wheatley Road) is notable for being very well related to village facilities; however, part of the site is poorly contained in Green Belt terms (specifically, there is no field boundary) and, regardless, the site is not available for affordable housing development.
- 5.11 The remaining nine sites are assigned an **amber** rating by the SOA, meaning that they are potentially suitable for development, subject to further work to explore the potential for identified issues to be addressed.
- 5.12 Of these nine amber sites, four can be ruled-out on the basis of being too small (under 0.2 ha).
- 5.13 The remaining five sites warrant being taken forward for further consideration through the assessment of reasonable affordable housing scenarios.

### The reasonable scenarios

- 5.14 In light of the discussion above, five sites warrant further consideration through the assessment of reasonable affordable housing scenarios:
- 5.15 Taking the remaining amber sites in turn:
  - Site 1 (Down's Farm; 1.3 ha)
  - Site 2a (City Farm; 1.7 ha)
  - Site 10 (Yeates Plot; 2 ha)
  - Site 13 ("Part of SHELAA site 865"; 1 ha)
  - Site 865 (East of Kiln Lane; 2.5 ha)
- 5.16 All of these sites are *potentially* large enough to deliver 16 affordable homes, although it could certainly prove to be the case that the smallest of these sites (Site 13) is not large enough, and the same could apply to other sites, once account is taken of onsite constraints that reduce the developable area.
- 5.17 This being the case, it is considered appropriate to simply **assess the five site options in isolation**, as opposed to defining and assessing site combinations. Informal consideration can still be given to potential in-combination effects.

# 6. Scenarios assessment

### Introduction

6.1 The aim of this section is to present assessment findings in relation to the five affordable housing scenarios introduced above.

### Assessment findings

- 6.2 Table 6.1 presents assessment findings in relation to the five scenarios.
- 6.3 With regards to methodology

Within each row (i.e. for each of the topics that comprise the SEA framework) the columns to the right hand side seek to both **categorise** the performance of each scenario in terms of 'significant effects' on the baseline (using red, amber and light green and dark green)<sup>6</sup> and also **rank** the alternatives in order of performance. Also, ' = ' is used to denote instances where the alternatives perform on a par (i.e. it not possible to differentiate between them).

The appraisal matrix is followed by a discussion, setting out reasons for the appraisal conclusions reached, with reference to available evidence.

<sup>&</sup>lt;sup>6</sup> Red indicates a significant negative effect; amber a negative effect that is of limited or uncertain significance; light green a positive effect that is of limited or uncertain significance; and dark green a significant positive effect. No colour is assigned where effects are considered to be neutral or uncertain.

Table 6.1: Affordable housing scenarios assessment findings

Торіс	Scenario 1 Site 1 (Down's Farm)	Scenario 2 Site 2a (City Farm)	Scenario 3 Site 10 (Yeates Plot)	Scenario 4 Site 13 ("Part of SHELAA site 865")	Scenario 5 Site 865 (East of Kiln Lane)
Biodiversity	2	1	71	2	2
Climate change	=	=	=	=	=
Historic environment	=	=	=	=	=
Health	1	1	1	1	2
Landscape	71	3	2	2	2
Land, soil & water resources	71	2	2	2	2
Population & community	2	2	2	71	1
Transportation	=	=	=	=	=

#### Discussion

The assessment shows a mixed picture, with each of the sites / scenarios associated with pros and cons. Scenario 1 stands out as performing well in respect of the most topics (three); however, there is a concern regarding footpath access, and there is a question-mark regarding its ability to deliver all 16 of the affordable homes required. Scenarios 3 and 4 also perform relatively well, in that each performs best in respect of two objectives, and neither stands-out as performing particularly poorly in respect of any topic. However, both Scenarios 3 and 4 are associated with draw-backs, which the Parish Council might choose to give particular weight to, when balancing competing topics/objectives.

Having made these initial points, the following bullet points consider the merits of the growth scenarios under each of the topic headings in turn:

- **Biodiversity** there are limited sensitivities within the Parish, with primary considerations being: two closely related patches of priority ('BAP') woodland habitat near to Site 1 (albeit it is important to note this site includes previously developed land); mature hedgerows (shown on early maps), notably affecting Sites 13 and 865; the historic landscaped grounds of Garsington Manor; and mature residential gardens. On this basis, Sites 1, 13 and 865 are considered to be subject to a degree of constraint.
- Climate change the key consideration here is climate change adaptation, and in particular the need to avoid areas of flood risk. None of the sites in question are subject to fluvial flood risk; however, a surface water flood risk channel affects a small part of Site 865. The area of flood risk is at the western extent of the site, and would presumably not affect the point of access (to the north of the site), hence this constraint is not considered to be significant, and the scenarios are ranked on a par.

N.B. in respect of climate change mitigation, the key consideration is greenhouse gas emissions from transport, which is a focus of discussion below, under 'Transport'.

- **Health** a primary consideration is that Site 865 is considered by the Parish Council to meet the criteria for Local Greenspace Designation, with the Draft Neighbourhood Plan explaining: "In continual use by local residents seeking relaxation in a rural idyll, as well as those wanting open space for play, or simply going for a walk." It is not possible to differentiate between the other sites with any certainty.
- **Historic environment** none of the sites are in proximity to a designated historic asset, although it is noted that City Farm (Site 2a) is shown on the earliest available map (1886). There is a need to give consideration to wider historic character; however, these are matters for discussion below, under the 'Landscape' heading. As such, the scenarios are ranked on a par.

N.B. the Oxfordshire Historic Environment Record (HER) lists 58 records for the Parish; however, these records are not mapped, and so it is not possible to draw on the HER.

• Landscape – is a key issue for this current assessment.

Beginning with the cluster of three sites associated with Wheatley Road, to the northeast of the village core, all are associated with raised land, hence there is a need to consider views to and from lower lying land. Of the three sites, Site 1 is likely to be subject to the least constraint, particularly given the existing built form (chicken sheds), and there could also be a degree of screening provided by hedgerows and the nearby woodland patches. In contrast, Site 2a and Site 10 comprise arable fields and are likely to contribute positively to the rural landscape. In particular, Site 2a could be significantly constrained in landscape terms, noting: the adjacent Oxford Green Belt Way; the possibility of long distance views towards Oxford; and little or no field boundary at the northern edge of the site. Google Street View suggests long distance views of Shotover Hill.

The final two sites are associated with the main built form of the village, which, broadly speaking, is 'a positive' in landscape terms. Beginning with Site 865, this site is potentially quite well contained within the landscape; however, it is publicly accessible and there is a very dense network of public footpaths intersecting and nearby to the site (including following higher ground), such that it is likely to have a degree of landscape value. Moving on to Site 13, it was identified by the Green Belt Study (2015) as "reflecting few functions of the Green Belt", and is associated with built form on two sides and a mature hedgerow on the third and final side (such that development might achieve a 'rounding-off'); however, there is a footpath adjacent, the site is visible from the Oxford Road and this part of the village is sensitive in landscape terms due to the proximity of Northfield. Even if the view is taken that the site does not contribute significantly to the landscape gap between the village and Northfield, it remains the case that there are arguments for a low density built form in this part of the village, e.g. linear built form similar to that currently found on the opposite side of the road.

In conclusion, Site 2a is considered likely to be subject to the greatest landscape constraint, and Site 1 the least constraint, whilst it is not possible to differentiate the other three sites with any confidence. It is appropriate to flag a notable concern regarding Site 2a, also noting the feasibility that it could come forward in combination with one or both of Sites 1 and 10, leading to urbanisation of sensitive raised land on the Oxford fringe.

Land, soil & water resources – the first point to note is that Site 1 benefits from significant previously developed land on site. The other four sites are either in productive agricultural use, or have the potential to be (at least for pasture), and there is no potential to differentiate between the sites according to agricultural land quality with any certainty (most agricultural land in this area is likely to be of 'best and most versatile' quality). As such, the remaining four sites are judged to perform on a par.

• Population & community – the primary consideration is delivery of affordable housing, and, in this respect, there is a need to highlight Site 1 as performing well, on the basis that the landowners have expressed an interest in developing their land in such a way as to ensure the long-term availability of affordable housing for the village. This could be achieved by using a charitable trust possibly, with the involvement of a housing association. On this basis, the site could potentially deliver all of the required affordable housing, despite being the second smallest of the five sites assessed. Site 13 could potentially prove too small to deliver the required number of affordable homes.

A further important consideration is the ability to easily access village facilities, noting SODC Local Plan Policy H10, which states that affordable housing exception sites must "not form an isolated development and have access to local services and facilities". In this respect, there is a concern regarding footpath access to and from the three sites to the northeast of the village, as the footpath along Wheatley Road narrows at one point, and then ends at the point where Sites 2a and 10 begin. There is the potential to extend the footpath. However, the costs involved could lead to pressure for market housing to enable delivery of the required affordable housing.

In conclusion, it is considered appropriate, on balance, to highlight a preference for the sites that relate best to the village core, with existing safe footpath access to facilities.

• **Transport** – the key transport consideration is the potential to walk and cycle to village facilities, which has also been discussed above. A further consideration is the need to support good access to the bus service to Oxford, which passes through the village centre. In this respect, it is again the case that the cluster of three sites to the northeast of the village core are not ideally located. A final consideration is safe vehicular access. However, in this respect, none of the sites/scenarios under consideration are known to be subject to any issues or constraint. In conclusion, the issues/effects here are *as per* those discussed above, under 'Population and community', hence it is considered appropriate to rank the alternatives on a par, to avoid double counting of effects.

# 7. The preferred approach

### Introduction

7.1 The aim of this section is to present the Neighbourhood Plan Working Party's reasons for supporting the preferred approach, in light of the scenarios assessment presented above.

### Reasons for supporting the preferred approach

7.2 The Neighbourhood Plan Working Party (which comprises residents along with members of Garsington Parish Council) has provided the following text:

"The preferred approach is to support Site 1 (Downs Farm), which is shown to perform relatively well through the assessment, including because of the currently developed nature of the site, which is a factor that the Working Party gives particular weight to. A further key reason for supporting this site is the landowner's expressed interest in developing their land in such a way as to ensure the long-term availability of affordable housing for the village.

The assessment highlights a concern regarding walking connectivity between the site and the village centre. However, access is considered to be suitable by the Working Party, assuming extension of the footpath along Wheatley Road.

The Working Party considered two other sites along Wheatley Road, to the northeast of the village, namely Sites 2 and 10. However, these sites perform poorly, relative to Site 1. In particular, development of Site 2a would impact on a sensitive landscape. As for Site 10, this site performs poorly, relative to Site 1, as it comprises productive agricultural land, and development would also lead to a landscape impact.

The two sites that are more closely associated with the village centre are judged to perform relatively poorly. With regards to Site 13, which the assessment suggests has a degree of merit, development is strongly opposed on the grounds of its proximity to the Northfield Local Plan allocation, plus it might not be possible to viably deliver the required number of affordable homes. With regards to Site 865, development is strongly opposed as the site is considered to meet the criteria for Local Green Space designation."

# Part 2: What are the SEA findings at this stage?

# 8. Introduction (to Part 2)

8.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the current 'pre-submission' version of the GNP.

# **Garsington Neighbourhood Plan policies**

8.2 The GNP puts forward 10 policies to guide development in the Plan area.

**Table 8.1: Garsington Neighbourhood Plan policies** 

Policy reference	Policy name
Policy 1a	Community Facilities
Policy 1b	Footpaths, Bridleways, and Cycleways
Policy 2	New Houses
Policy 3a	Protection of Views
Policy 3b	Local Settlement Gaps
Policy 4	Housing Mix
Policy 5	Design Guide
Policy 5a	New Housing Density
Policy 5b	Housing Infill Policy
Policy 6	Local Green Spaces

# Methodology

- 8.3 The assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping (see **Table 3.2**) as a methodological framework.
- 8.4 Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the policies under consideration and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim of striking a balance between comprehensiveness and conciseness). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the draft plan in more general terms.
- 8.5 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e. the potential for the Neighbourhood Plan to impact an aspect of the baseline when implemented alongside other plans, programmes and projects. These effect 'characteristics' are described within the assessment as appropriate.

# 9. Appraisal of the GNP

9.1 A discussion is presented under each of the thematic headings that together comprise the core of the SEA framework (see Section 3).

### **Biodiversity**

- 9.2 There are limited biodiversity constraints within the Plan area, with no European or nationally designated sites within or near to the Plan area. However, a network of important habitats has been identified which support local ecological connectivity, predominantly formed of woodland areas in the Parish.
- 9.3 In terms of the affordable housing site allocation, the site is not known to contain any priority habitat but does lie adjacent to a woodland area identified as priority habitat. The GNP supporting text identifies this constraint and GNP Policy 5 (Design Guide) outlines criteria for good design which includes "protecting and enhancing nature conservation, watercourses, wildlife habitat, trees and landscape character". On this basis, no significant effects are anticipated because of the allocation proposed through the GNP.
- 9.4 Alternatively, the added protection for local habitats provided through Policy 5 (Design Guide) as well as local green spaces provided through Policy 6 are likely to provide additional support in retaining ecological connectivity in future growth. Despite this, no significant deviations from the baseline are anticipated and broadly **neutral effects** are considered likely overall.

### Climate change

- 9.5 With both mitigation and adaptation as key considerations alongside a wider Council commitment to carbon neutrality and climate action, there are a range of factors to contend with in planning for future development.
- 9.6 A primary mitigation consideration is emissions from transport, as the biggest contributing sector to emissions overall in the District. Despite the rural nature of the Parish, a relatively healthy proportion of residents still cycle or catch a bus to work, or work from home. Additionally, the existing footpath network through the Parish is extensive and benefits existing residents with good connections to the village centre, and the local services and facilities available there.
- 9.7 Capitalising on this network the GNP identifies that "proposals for all types of development will, where appropriate, provide safe pedestrian access to link with existing or proposed pathways and cycle routes, ensuring that residents, including those with disabilities, can walk or cycle safely to village amenities." Whilst continued use of private vehicles is an anticipated factor of future growth, the growth proposed through the GNP (16 affordable homes) is not considered likely to lead to effects of significance in terms of emissions. Furthermore, policy support is provided for continued expansion of the Electric Vehicle (EV) charging infrastructure network (Policy 5 Design Guide).
- 9.8 Emissions from the domestic sector can also be influenced by the design and adaptability of new development to accommodate for more efficient heating, cooling and energy supply, and currently, photovoltaics form the most dominant

- renewable energy installation type in the District. This potential is reflected through the criteria outlined for good design in Policy 5 (Design Guide). Policy 5 includes criteria for "innovative design that is sustainable in its design, construction and operation" and "considerations such as renewable energy generation and zero energy building".
- 9.9 A primary consideration in relation to **adaptation** is current and future flood risk. Fluvial flood risk is currently contained within the corridor of Baldon Brook. The affordable housing site allocation avoids locating development within the vicinity of Baldon Brook, and no significant effects are anticipated in this respect. Surface water flood risk is more prevalent throughout the settlement area, and high-risk areas largely intersect local roads. Opportunities in development to improve surface water drainage, particularly within road infrastructure upgrades, could support long-term positive effects; and the proposed affordable housing allocation avoids areas of high surface water flood risk.
- 9.10 GNP Policy 5 (Design Guide) recognises a crucial element of high-quality design is "ensuring that proposals do not lead to increases in flood risk or drainage problems", furthermore, development is expected to adopt "the principles of sustainable urban drainage, within the village envelope". This provides additional protection in relation to flood risk, alongside that provided by the Local Plan and National Planning Policy Framework.
- 9.11 The contribution of green infrastructure to climate resilience is also a consideration in planning and future development in the Parish. In this respect, the GNP provides policy protections for identified local green spaces (Policy 6), watercourses, wildlife habitats, trees and nature conservation (Policy 5) supporting the long-term vitality of green infrastructure networks in the Plan area.
- 9.12 Considering the above, no significant deviations from the baseline are anticipated in relation to climate change mitigation or adaptation. Whilst trends that favour private vehicle use are likely to continue, this is not likely to lead to significant effects, and per capita emissions are likely to continue their broader downward trend. On this basis, broadly **neutral effects** are anticipated in implementation of the GNP.

### Landscape

- 9.13 The landscape of the Parish is characterised by two main types: 'open farmed hills and valleys' and 'flat open farmland'. Both types indicate the overall rural nature of the Parish with strong agricultural connections. Most notably, the topography of the landscape leads to high intervisibility as well as valued long-distance views. The Parish is strongly associated with Oxford's setting.
- 9.14 The site identified as suitable in the GNP for the development of 16 affordable homes is associated with higher ground, away from the main settlement core, but benefits from a considerable amount of existing built form onsite, as well as some screening vegetation. It is not clear that there are any sensitive visual receptors, e.g. footpaths with views to or across the site. Furthermore, Policy 3a (Protection of Views) provides protection, requiring that development should not have a significant adverse impact; and screening vegetation will be afforded protection under Policy 5 (Design Guide).

- 9.15 The predominant need to protect and retain rural landscape character is echoed throughout the Plan and its proposed policies. Alongside the protection of important views established under Policy 3a, Policy 2 seeks affordable housing development that does not cause substantial harm to the openness of the Green Belt, and Policies 3b and 3c seek to retain landscape gaps between the settlements within and surrounding the Plan area. Policy 5 (Design Guide) provides further protection for contributing landscape features, seeking materials that "complement the palette of materials used within the area", and using common landscape features in new development, such as stone walling, hedgerows or tree lined highway boundaries. The extensive network of footpath and bridleway connections with the surrounding countryside is also protected through Policy 1b (Footpath, Bridleways and Cycleways).
- 9.16 Green infrastructure is recognised for its contributing role in the landscape of the Plan area and the GNP provides policy protections for identified local green spaces (Policy 6), watercourses, wildlife habitats, trees and nature conservation (Policy 5) supporting the long-term vitality of existing networks.
- 9.17 Overall, the allocation in GNP leads to a minor concern of adverse effects, but these concerns are alleviated by the proposed policy framework. As such, **neutral effects** are predicted.

### Historic environment

- 9.18 The Plan area holds rich historic values, evidenced through the wealth of listed structures, Garsington Village Cross Scheduled Monument and Garsington Manor (Registered Park and Garden). Most of these assets fall within the Garsington Conservation Area, which is also supported by the topography of the area lending to commanding long-distance views as part of the heritage setting. There is also evidence of archaeological findings, including from the Bronze Age, Iron Age and Medieval times.
- 9.19 The site identified as suitable in the GNP for the development of 16 affordable homes is distant from Garsington Conservation Area, and not in proximity to any listed building. A broader concern is in respect of any impacts to historic setting of Oxford, but this is primarily a landscape consideration. Importantly, Policy 3a (Protection of Views) provides direct protection for the identified key view, and requires development to "preserve or enhance the local character of the landscape".
- 9.20 Wider policies in the GNP which seek to protect historical assets that individually or collectively contribute towards local identity (Policy 3b Separation of Settlements), maintain densities (Policy 5a Housing Density) and protect local green spaces (Policy 6) will also contribute to the long-term protection of heritage settings in the Plan area.
- 9.21 Overall, no significant effects are considered likely, and a well-designed scheme has the potential to minimise impacts on historic landscape character. As a result, **neutral effects** are considered likely.

### Land, soil and water resources

- 9.22 Baseline data has identified a high likelihood of high-quality (best and most versatile) agricultural land immediately surrounding the settlement area, and these soil resources have a high potential to be lost in new development. However, the proposed allocation is predominantly previously developed land, with extensive chicken sheds onsite.
- 9.23 Whilst water resources are managed at the catchment scale, it is recognised that the Plan area (as part of the wider Thames Water supply area) is known to be an area under serious water stress. Wider measures undertaken by water companies, such as the new South East Strategic Reservoir in Oxford, will seek to address predicted shortfalls in water supply, however, water efficiency measures at the domestic level can support wider goals to reduce consumption and ease pressure on water resources. Whilst this is not explicitly addressed through the GNP, Policy 5 (Design Guide) does encourage innovative design that is sustainable in operation.
- 9.24 With regards to water quality, the proposed affordable housing site allocation does not intersect or lie near to watercourses in the Plan area. Furthermore, it is anticipated that suitable drainage systems will be provided in line with the provisions of the NPPF and Local Plan and supported by the provisions of GNP Policy 5 (Design Guide).
- 9.25 Overall, no significant effects are considered likely, hence **neutral effects** are predicted.

### Population and communities

- 9.26 The provisions of the GNP seek to support the local community, particularly through the delivery of new affordable homes (Policy 2), targeting identified needs within the Plan area for affordable family homes and homes for older people to downsize into. Policy 4 (Housing Mix) outlines the preferred strategy for housing types, which "addresses the shortage of smaller and affordable houses" in perpetuity, considering the needs of both current and future households. The policy strongly encourages smaller dwellings comprised of single houses, terraced cottages or groups of detached or semi-detached dwellings, providing an element of affordable housing for people "with a local connection".
- 9.27 Furthermore, the provisions of Policy 1b (Footpaths, Bridleways and Cycleways) require that "proposals for all types of development, will, where appropriate, provide safe pedestrian access to link up with existing or proposed pathways and cycle routes, ensuring that residents, including those with disabilities, can walk or cycle safely to village amenities". The policy provisions ensure good accessibility in future development and Policy 1a seeks to provide additional protection in retaining existing community facilities in the village.
- 9.28 Further policy provisions which seek to retain gaps between settlements (Policies 3b and 3c), protect important views (Policy 3a), deliver high-quality design (Policy 5), retain density levels (Policy 5a) and protect local green spaces (Policy 6) will benefit residents in the long-term with a continued high-quality environment supporting the health and wellbeing of residents.

9.29 On this basis, the GNP, through delivery of additional affordable and connected homes over and above the provisions of the Local Plan, is considered likely to lead to long-term **significant positive effects** in relation to this SEA theme.

### Health and wellbeing

- 9.30 Residents in the GNP area generally benefit from good health and are supported by a relatively extensive Public Rights of Way (PRoW) and Green Corridor network providing connections within the settlement and with the surrounding countryside. The Plan area also benefits from good access to local green spaces. The GNP provides policy protection for identified local green spaces (Policy 6) and seeks to ensure that future development connects with the network of footpaths and cycle routes. In particular, Policy 1b (Footpaths, Bridleways and Cycleways) requires that "proposals for all types of development, will, where appropriate, provide safe pedestrian access to link up with existing or proposed pathways and cycle routes, ensuring that residents, including those with disabilities, can walk or cycle safely to village amenities". Policy 1b prioritises active travel as a 'first-choice' mode of transport locally, recognising factors which influence the modal choice such as "provision of benches, accessible gates and cycle-friendly road adaptations".
- 9.31 The baseline information highlights a lack of accessible green space of over 2ha within 2km of the settlement, and any opportunities for development contributions to such delivery should be capitalised upon. However, it is recognised that the GNP seeks the development of affordable housing rather than market housing, making the potential for such contributions less viable and highlighting inevitable trade-offs in this respect.
- 9.32 Further policy provisions which seek to retain existing community facilities, deliver housing types and tenures to meet local needs (Policies 2 and 4), and deliver high-quality design in new development (Policy 5) are also likely to provide support for positive health outcomes and maintain low levels of deprivation in the Plan area.
- 9.33 Overall, the provisions of the GNP are considered likely to support existing and future residents with positive health outcomes in terms of the quality of the local environment and accessibility of development. **Minor positive effects** are anticipated.

### **Transportation**

- 9.34 As a rural Parish, the sustainable transport connections within Garsington are limited, and there is a prevailing reliance on private vehicles. Despite this, evidence indicates a relatively high level of residents commuting by cycling and by bus, reflecting relatively good access into Oxford and larger towns nearby.
- 9.35 The GNP does not propose a level of growth that would significantly impact upon the baseline, though this does not detract from the reality that trends of residents relying on private vehicles as their main form of transport are likely to continue. This is likely to be compounded by a lack of consistent footpath access to the site to connect it with the village. Despite this the proposed allocation is located within a mile of existing bus stops.

- 9.36 The Plan area benefits from an extensive and established network of footpaths and bridleways which provide residents with both good access to the countryside and surrounding areas and into the village centre. GNP Policy 1b (Footpaths, Bridleways and Cycleways) recognises the benefits provided by established routes and requires that "developments should respect and conserve the parish's footpaths and bridleways" with any proposals affecting existing paths demonstrating "how the route and its environment were to be protected or an appropriate alternative identified". Furthermore, the Policy identifies that "proposals for all types of development will, where appropriate, provide safe pedestrian access to link up with existing or proposed pathways and cycle routes, ensuring that residents, including those with disabilities, can walk or cycle safely to village amenities" and prioritises active travel as a 'firstchoice' mode of transport locally. Support for active travel is recognised through "provision of benches, accessible gates and cycle-friendly road adaptations". This is reiterated through design criteria (Policy 5) which requires "safe access for pedestrians, cyclists and road users". This should ensure that development at the allocation site avoids negative effects arising for residents, however it is recognised that the required footpath connections at the site may affect the viability of a purely affordable housing development scheme.
- 9.37 Garsington residents also have a relatively high proportion of people working from home, which has also ultimately been significantly influenced in more recent times by the CV19 pandemic. It is considered likely that higher levels of homeworking will prevail as we emerge from the restrictions of the pandemic, and planning should consider factors which influence one's ability to do so. In this respect, the potential broadband connections for development at each of the proposed plots is identified through the supporting text.
- 9.38 Overall, no significant impacts in relation to traffic and congestion are anticipated from the development of 16 homes in the Plan area. The additional policy provisions ensure that development will be accessible by sustainable transport modes and seek to promote active travel opportunities and the required footpath connections. On this basis, **broadly neutral effects** are considered likely overall.

### **Cumulative effects**

- 9.39 The provision of affordable housing will contribute to supporting the growth of local communities alongside the provisions of the Local Plan, and positive cumulative effects are anticipated in this respect.
- 9.40 Whilst development in the Plan area has the potential to increase cumulative pressures on water resources, the small-scale development proposed is not considered likely to lead to cumulative impacts of significance.
- 9.41 The additional protection afforded to local habitats is also considered likely to support wider positive effects in terms of ecological connectivity at the District scale.

### **Conclusions**

- 9.42 Overall, the only effects of significance anticipated to emerge in implementation of the plan are considered likely to be positive. This predominantly relates to the delivery of affordable housing and smaller homes to meet locally identified needs. Minor positive effects are also anticipated in relation to health and wellbeing, given the policy emphasis placed on active travel connections in new development.
- 9.43 Broadly neutral effects are concluded in relation to biodiversity, climate change, land, soil and water resources, landscape, the historic environment and transportation, reflecting the overall conclusion that there will be no significant deviation from the baseline for these SEA themes.

#### Recommendations

9.44 It is recognised that recommendations could be made to expect more from development proposals in terms of their sustainability performance, or contribution to improving the environment and accessibility. However, this needs to be considered in the context of the Plan, which seeks affordable housing development only. Increasing the requirements placed on development in this respect, will ultimately reduce the viability of development proposals for affordable units in perpetuity. The SEA therefore recognises that relevant 'trade-offs' are a dominant planning consideration and no recommendations to increase the burdens on development are made at this stage.

# Part 3: What are the next steps?

Part 3 25

# 10. Next steps

## Plan finalisation

- 10.1 This Environmental Report accompanies the pre-submission version of the GNP for consultation.
- 10.2 Following consultation, any representations made will be considered by the Neighbourhood Plan Steering Group, when finalising the plan for submission.
- 10.3 The 'submission' version of the plan will then be submitted to South Oxfordshire District Council (alongside an Environmental Report Update, if necessary). The plan and supporting evidence will be published for further consultation, and then submitted for Independent Examination.
- 10.4 At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.
- 10.5 If the subsequent Independent Examination is favourable, the GNP will be subject to a referendum, organised by South Oxfordshire District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the GNP will become part of the Development Plan for South Oxfordshire District, covering the defined Neighbourhood Plan Area.

# **Monitoring**

- 10.6 The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report.
- 10.7 It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by South Oxfordshire District Council as part of the process of preparing its Annual Monitoring Report (AMR).
- 10.8 The SEA has not identified any potential for significant negative effects that would require closer monitoring, led by the Parish Council.

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# **Appendices**

# **Appendix I: Meeting the Regulations**

As discussed in Chapter 1 above, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 (the Regulations) explains the information that must be contained in the Environmental Report; however, interpretation of Schedule 2 is not straightforward. Table Al.1 links the structure of this report to an interpretation of Schedule 2 requirements, whilst Table Al.2 explains this interpretation. Table Al.3 identifies how and where within this report the requirements have/ will be met.

Table Al.1: Questions answered by this report, in-line with an interpretation of regulatory requirements

	Questions answered		As per regulations, the report must include
	What's the plan seeking to achieve?		<ul> <li>An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes</li> </ul>
Ē	e;	What's the sustainability 'context'?	<ul> <li>Relevant environmental protection objectives, established at international or national level</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
Introduction	What's the sustainability 'baseline'?		<ul> <li>Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan</li> <li>The environmental characteristics of areas likely to be affected</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
	>	What are the key issues and objectives that should be a focus?	<ul> <li>Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment</li> </ul>
Part 1	What has plan-making / SEA involved up to this point?		<ul> <li>Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach)</li> <li>The likely significant effects associated with alternatives</li> <li>Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan</li> </ul>
Part 2	What are the SEA findings at this current stage?		<ul> <li>The likely significant effects associated with the draft plan</li> <li>The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan</li> </ul>
Part 3	What happens next?		■ A description of the monitoring measures envisaged

### **Table Al.2: Interpretation of the regulations**

#### Schedule 2

#### Interpretation of Schedule 2

#### The report must include...

#### (a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;

- (b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan
- (c) the environmental characteristics of areas likely to be significantly affected;
- (d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;
- (e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;
- (f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;
- (g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;
- (h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information
- (i) a description of the measures envisaged concerning monitoring.

#### The report must include...

An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes

i.e. answer - What's the plan seeking to achieve?

Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance

The relevant environmental protection objectives, established at international or national level

The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'

The environmental characteristics of areas likely to be significantly affected

Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance

Key environmental problems / issues and objectives that should be a focus of appraisal i.e. answer - What's the 'baseline'?

What's the scope of the SA?

answer -

Φį

i.e. answer - What's the

'context'?

i.e. answer - What are the key issues & objectives?

An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach)

The likely significant effects associated with alternatives, including on issues such as...

... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan. i.e. answer - What has Planmaking / SA involved up to this point?

[Part 1 of the Report]

The likely significant effects associated with the draft plan

The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan

i.e. answer - What are the assessment findings at this current stage?

[Part 2 of the Report]

A description of the measures envisaged concerning monitoring

i.e. answer - What happens next?

[Part 3 of the Report]

### Table Al.3: 'Checklist' of how (throughout the SEA process) and where (within this report) regulatory requirements are met

A) The Environmental Report must present certain information

# Discussion of how requirement is met Regulatory requirement

1. An outline of the contents, main objectives of the plan or programme, and

relationship with other relevant plans and programmes;

Chapter 2 ('What is the plan seeking to achieve') presents this information.

- 2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;
- 3. The environmental characteristics of areas likely to be significantly affected;
- 4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;

These matters have been considered in detail through scoping work, which has involved dedicated consultation on a Scoping Report. The 'SEA framework' – the outcome of scoping – is presented within Chapter 3 ('What is the scope of the SEA?'). More detailed messages, established through a context and baseline review are also presented in Appendix II of this Environmental Report.

5. The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;

The SEA framework is presented within Chapter 3 ('What is the scope of the SEA'). Also, Appendix II presents key messages from the context review.

With regards to explaining "how...considerations have been taken into account", Chapter 7 explains the Steering Group's 'reasons for supporting the preferred approach', i.e. explains how/ why the preferred approach is justified in light of alternatives assessment.

- 6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);
- Chapter 6 presents alternatives assessment findings (in relation to housing growth, which is a 'stand-out' plan policy area). Chapters 9 presents an assessment of the draft plan.

With regards to assessment methodology, Chapter 8 explains the role of the SEA framework/scope, and the need to consider the potential for various effect characteristics/ dimensions, e.g. timescale.

7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;

The assessment highlights certain tensions between competing objectives, which might potentially be actioned when finalising the plan. Also, recommendations are discussed in Chapter 9.

#### Discussion of how requirement is met Regulatory requirement 8. An outline of the reasons for selecting Chapters 4 and 5 deal with 'Reasons for the alternatives dealt with, and a selecting the alternatives dealt with', in that description of how the assessment was there is an explanation of the reasons for undertaken including any difficulties (such focusing on particular issues and options. as technical deficiencies or lack of know-Also, Chapter 7 explains the Group's how) encountered in compiling the required information; reasons for selecting the preferred option (in-light of alternatives assessment). 9. Description of measures envisaged Chapter 11 presents measures envisaged concerning monitoring in accordance with concerning monitoring. Art. 10; 10. A non-technical summary of the The NTS is provided at the beginning of this information provided under the above Environmental Report. headings

### B) The Report must be published for consultation alongside the draft plan

Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)

At the current time, this Environmental Report is published alongside the 'presubmission' version of the Neighbourhood Plan, with a view to informing Regulation 14 consultation.

# C) The report must be taken into account, alongside consultation responses, when finalising the plan

The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.

This Environmental Report, and consultation responses received, will be taken into account by the Group when finalising the plan.

# Appendix II: The scope of the SEA

### Introduction

This appendix presents additional information on the SEA scope, namely key issues under each of the SEA framework headings. As set out in the Scoping Report, these key issues were identified following a review of the context and baseline.

Additionally, this appendix presents a summary of responses received as part of the scoping consultation.

### Air quality

- The main pollutant of concern in the Plan area is nitrogen dioxide and this largely relates to the effects of emissions from vehicles, particularly within areas prone to congestion. The effects of the GNP in relation to traffic and congestion will be explored under the 'transportation' SEA theme.
- The GNP presents opportunities to improve accessibility and support more local and sustainable journeys/ connections. These opportunities will be explored under the 'transportation' and 'population and communities' SEA themes.

### **Biodiversity**

 Growth in the GNP area should seek to avoid the loss or fragmentation of Priority Habitat. Instead, the GNP provides an opportunity to target habitat enhancement/ creation in development, potentially guided by the identified Network Enhancement and Expansion Zones.

# Climate change (mitigation and adaptation)

- The GNP area is partially affected by areas of high and medium fluvial and surface water flood risk. The GNP provides the opportunity to direct growth away from areas of current, or potentially future flood risk. In areas of surface water flood risk, development which provides improved drainage could also reduce flood risk in the long-term. Furthermore, it will be important for any development in the vicinity of the floodplain to ensure that suitable drainage is provided which ensures development will not lead to adverse effects on water quality.
- The transport sector continues to be a key challenge in terms of reducing emissions. The GNP provides opportunities to guide development towards the most accessible locations in the Plan area and require local infrastructure (including walking and cycling infrastructure) improvements where appropriate.
- The GNP should seek to maximise opportunities for local renewable energy and electric vehicle infrastructure development, as well as new green infrastructure and improved ecological links, to complement the existing district climate change strategies.

### Health and wellbeing

- There is a lack of accessible green space of over 2ha within 2km of the settlement, and the GNP provides the opportunity to require appropriate development contributions to addressing these shortfalls. Planning can also support the interconnectivity of open and recreational spaces, maximising their access by sustainable modes (e.g. walking and cycling).
- The GNP could also seek improvements to the public realm which maximise social inclusion and address any existing infrastructure/ mobility issues for more vulnerable residents.

#### **Historic environment**

- With a variety of designated assets and archaeological finds in the Plan area, it will be important to ensure that future development avoids/ minimises impacts upon the historic environment and maximises opportunities to improve the public realm and green infrastructure; to the indirect benefit of heritage settings.
- With no conservation area appraisal in place, the GNP provides an opportunity to gather evidence in relation to the significance of Garsington Conservation Area, its key features and values derived locally, and implement local controls where appropriate.

### Landscape

- Despite its proximity to Oxford, Garsington retains a rural character and provides residents with good access to the surrounding countryside. It will be important to retain this character in future development, and take advantage of key connections, delivering, where possible, targeted landscape/ green infrastructure improvements.
- The Plan area is set in rising topography that affords good views across the surrounding countryside in areas. Key views could be identified through the Plan process and provided policy protections.
- The growth strategy for the GNP should seek to minimise landscape impacts, including through avoidance/ protection of key landscape features such as trees and hedgerows.

### Land, soil and water resources

- The precise ALC is unknown for much of the GNP area and so the extent and significance of potential effects in development may be more difficult to ascertain in the absence of site level investigations. Despite this, it is predicted that higher quality agricultural land immediately surrounds the settlement area, giving way to significant potential for the loss of BMV land. The GNP provides opportunities to avoid/ minimise the loss of agricultural land in these areas.
- It will be important for future development to ensure that it avoids any detrimental impacts on water quality both on and off-site. Furthermore, the GNP should seek to capitalise on any potential opportunities to improve water quality, particularly chemical quality.
- The GNP could also seek to support extended measures to improve the resilience of water supplies, including through local water recycling schemes and opportunities to increase efficiency in water use.

### Population and communities

- The GNP provides the opportunity for enhanced policy provisions which seek to
  deliver the right mix of housing types, tenures and sizes according to local needs,
  in suitably connected places; and reduce deprivation in this respect.
- The GNP provides the opportunities to plan for development which accommodates for changing working patterns and lifestyles, and places greater emphasis on high levels of accessibility.

### **Transport**

- In the absence of strategic transport interventions, growth in the Plan area is likely to continue prevalent trends in which residents' favour private vehicles as the transport mode of choice/ necessity. It will therefore be important to locate any additional growth in areas which maximise pedestrian and cycle route connections within the settlement and beyond and support higher levels of self-containment.
- A relatively high proportion of residents in the Plan area work from home when compared to England and the South East averages and this trend is forecast to become more prevalent when considering the ongoing pandemic. Opportunities to capitalise on this positive trend should be maximised.
- Whilst bus services serve the Plan area, there is no direct rail access. Future
  development should seek to ensure appropriate connections to existing
  infrastructure and improve access to the extensive PROW network within the Plan
  area to encourage more sustainable modes of transportation.

# Scoping consultation responses

The draft SEA scoping report was shared with the Environment Agency, Historic England and Natural England for formal consultation in early 2021. The responses received and how they have been addressed are presented below.

Table All.1: SEA scoping consultation responses

Consultee	Consultation response summary	<b>AECOM</b> response
Environment Agency	No comments received	N/a
Historic England	No comments received	N/a
Natural England	No specific comments, a general list of relevant policies, plans and programmes is provided alongside an annex of advice on sources of local plan evidence on the natural environment. In relation to the key issues and objectives, NE note that "We welcome the issues and objectives identified with regards to biodiversity, landscape and soils. We also support consideration of the provision of green infrastructure in relation to objectives for climate change and health and wellbeing."	N/a

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