Planning Policy

www.oxford.gov.uk

OXFORD CITY COUNCIL

Barton Area Action Plan Sustainability Appraisal and Habitats Regulations Assessment Adoption Statement

November 2012

TABLE OF CONTENTS

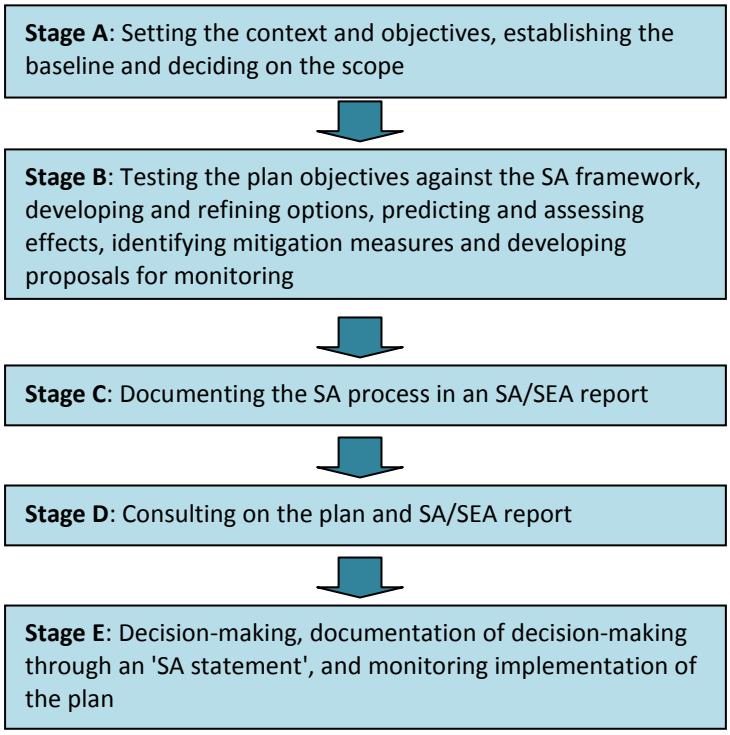
1. INTRODUCTION

After a two and half year process, Oxford City Council's Barton Area Action Plan (AAP) was approved by the Planning Inspectorate in November 2012, and was adopted by the Full Council on 17 December 2012. As part of the development of the AAP, its effects were assessed through a Sustainability Appraisal (SA) and a Habitats Regulations Assessment (HRA). This report explains how the SA and HRA processes affected the development of the AAP: it is the 'SA statement' for the Barton Area Action Plan.

SA identifies the social, environmental and economic impacts of a strategy and suggests ways to avoid or minimise negative impacts and maximise positive impacts. It is required by the Planning and Compulsory Purchase Act 2004, and also incorporates the strategic environmental assessment (SEA) requirements of the European 'Strategic Environmental Assessment' Directive, transposed into UK legislation through the Environmental Assessment of Plans and Programmes Regulations 2004. SA/SEA has five main stages, as shown in Figure 1.1. This report fulfils one of the requirements of Stage E, namely documentation of the decision-making process.

HRA assesses the impacts on the Natura 2000 network of internationally important nature conservation sites. It is required by the European 'Habitats Directive', transposed into UK legislation through the Conservation of Habitats and Species Regulations 2010 (and previous similar legislation). The Habitats Directive applies the precautionary principle to designated sites: plans can only be permitted if it has been shown that they will not adversely affect the designated sites, or else can go ahead only under limited and stringent requirements regarding findings of no alternatives, imperative reasons of overriding public interest and provision of compensatory measures.

Figure 1.1: The sustainability appraisal / strategic environmental assessment process



Regulation 16 of the Environmental Assessment of Plans and Programmes Regulations 2004 requires that, as soon as reasonably practicable after the adoption of a plan for which an SA/SEA has been carried out, the planning authority must make a copy of the plan publicly available alongside a copy of the SA report and an 'SA statement'; and inform the public and consultation bodies about the availability of these documents. The consultation bodies are English Heritage, Natural England and the Environment Agency. The SA statement must explain:

a. how sustainability/environmental considerations have been integrated into the plan;
b. how the SA/environmental report has been taken into account;
c. how consultation opinions on the SA/environmental report of the public, consultation bodies and where appropriate other European Member States have been taken into account;
d. the reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with; and
e. the measures that are to be taken to monitor the significant sustainability/environmental effects of the implementation of the plan or programme.

This SA statement documents these points, following the structure set out above:

- Section 2 explains the links between the plan-making and SA/SEA processes, who carried out the SA/SEA, and what assessment framework was used;
- Section 3 discusses how the further research and mitigation measures proposed at various stages of the SA/SEA process were implemented and incorporated into the AAP;
- Section 4 summarises the consultation opinions on the SA/SEA and describes what changes were made to the SA/SEA process in response to these comments;
- Section 5 describes the alternatives/options considered as part of the AAP development process, and why the preferred options were chosen; and
- Section 6 describes how the significant sustainability/environmental impacts of the AAP will be monitored.

The HRA process for the AAP is summarised at Section 7.

Much of the information in this report is a summary of more detailed reports which were prepared as Core Documents for the Examination in Public of the Barton Area Action Plan, and which are available in full from http://www.oxford.gov.uk/PageRender/decP/BartonAAPandSitesandHousingDPDCoreDocuments.htm. Throughout this SA/SEA statement, 'CDx/x' refers to these Core Documents.

2. HOW ENVIRONMENTAL/SUSTAINABILITY CONSIDERATIONS HAVE BEEN INTEGRATED INTO THE BARTON AREA ACTION PLAN

The Barton Area Action Plan has gone through a series of stages between June 2010 and December 2012, starting with evidence gathering, then issues, preferred options, proposed submission, and examination. The SA was carried out in-house, with periodic quality reviews by Levett-Therivel. This has allowed the findings of the SA to be fully integrated into the preparation of the AAP. An SA/SEA scoping report was prepared as part of the evidence gathering stage, and the sustainability impacts of the evolving AAP were subsequently assessed at each stage of plan-making. This is shown in Table 2.1.

Table 2.1: Links between Barton Area Action Plan development and SA/SEA

Date	Plan-making stage	SA/SEA stage	Comments
	Evidence gathering	Local Development Framework Scoping Report (incorporating Task A1)	The LDF Scoping Report was produced in January 2006 and updated in April 2011
Early 2010	Preparation of *Issues Document*	Preparation of *Scoping Report for the Local Development Framework - Addendum for the Barton Area Action Plan* (incorporating Tasks A2-A4: identifying other relevant plans, policies and programmes and SA objectives, collecting baseline information, identifying sustainability issues and developing the SA framework)	
11 June - 23 July 2010	Consultation on *Barton AAP Issues Document* (CD7.16)	Consultation on *Scoping Report for the Local Development Framework - Addendum for the Barton Area Action Plan* (CD1.9) (task A5: consulting on the scope)	Consultation responses summarised in CD1.8
Late 2010-early 2011	Preparation of *Barton AAP Preferred Options Document*	Preparation of initial *SA report* (incorporating Tasks B1-B5: Testing the AAP objectives against the SA framework, Developing the AAP options, Predicting the effects of the options, Evaluating the effects, and considering ways of mitigating adverse effects and maximising beneficial effects)	
13 May - 24 June 2011	Consultation on *Barton AAP Preferred Options Document*	Consultation on initial *SA Report*	Consultation responses summarised in CD1.13
Late 2011	Preparation of *Barton AAP Proposed Submission Document*	Preparation of *SA Update Report* (Incorporating tasks A1-5, B1-6 and C1)	Addressed significant changes since the Preferred Options

Date	Plan-making stage	SA/SEA stage	Comments
10 February - 23 March 2012	Consultation on *Barton AAP Proposed Submission document*	Consultation on *SA Update Report* (CD1.10)	Responses summarised in CD1.13
13 April 2012	Submitted Barton AAP	*SA Update Report* submitted alongside AAP	
Summer 2012	Examination of Barton AAP	Preparation of *Addendum to the Sustainability Appraisal for the Barton Area Action Plan* (Incorporating SA of 3 Main Modifications and Ruskin Fields)	Further SA work produced in response to Inspector's request at the examination
27 July - 7 September 2012	Examination of Barton AAP	Consultation on *Addendum to the Sustainability Appraisal for the Barton Area Action Plan*	Responses summarised in CD7.27
Sep 2012	Second set of Examination hearings	Preparation of *Update to the Addendum for the Sustainability Appraisal of the Barton Area Action Plan* (relating to 50 mph on the ring-road) (CD7.27)	
Dec 2012	Final Inspector's Report received		
17 December 2012	Barton AAP adopted		

An SA/SEA framework was used to structure each of the assessment stages. The framework covers all of the environmental topics listed in the SEA Directive, namely 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. This is shown in Table 2.2.

Table 2.2: SA/SEA Framework for the Barton AAP

SEA objective	SEA Directive topic
To reduce the risk of flooding and the resulting detriment to public well-being, the economy and the environment	human health water
To encourage urban renaissance by improving efficiency in land use, design and layout	soil interrelationships
To meet local housing needs by ensuring that everyone has the opportunity to live in a decent, affordable home	population human health
To improve the health and well-being of the population and reduce inequalities in health	human health
To reduce poverty and social exclusion	population human health material assets interrelationships
To raise educational achievement levels and develop the opportunities for everyone to acquire the skills needed to find and remain in work	
To reduce crime and fear of crime	
To create and sustain vibrant communities	
To provide accessible essential services and facilities	
To make opportunities for culture, leisure and recreation readily accessible	
To reduce air pollution and ensure air quality continues to improve	air
To address the causes of climate change through reducing emissions of greenhouse gases, and ensure that Oxford is prepared for associated impacts	climatic factors
To conserve and enhance Oxford's biodiversity	biodiversity flora fauna
To protect and enhance and make accessible for enjoyment Oxford's countryside and historic environment	landscape cultural heritage
To reduce road congestion and pollution levels by improving travel choice, shortening length and duration of journeys and reducing the need for travel by car/lorry	air climatic factors
To use natural resources sustainably	water soil climatic factors
To reduce waste generation and disposal, and achieve the sustainable management of waste	material assets
To maintain and improve water and soil quality and to achieve sustainable water and soil resource management	water soil
To increase energy efficiency and the proportion of energy generated from renewable sources in Oxford	climatic factors material assets
To develop and maintain a skilled workforce to support long-term competitiveness of the region	
To ensure high and stable levels of employment so everyone can benefit from the economic growth of Oxford	
To sustain economic growth and competitiveness across Oxford	
To develop a dynamic, diverse and knowledge-based economy that excels in innovation with higher value, lower impact activities	
To stimulate economic revival in priority regeneration areas.	
To encourage the development of a buoyant, sustainable tourism sector	

3. HOW THE SUSTAINABILITY APPRAISAL REPORT HAS BEEN TAKEN INTO ACCOUNT

The SA process helped to identify preferred options for the Barton AAP: this is discussed at Section 5. This chapter considers influences that the SA had on the development of the Barton AAP.

Because of the tight integration of plan-making and SA discussed at Section 2, it has not always been possible to identify those changes made specifically as a result of the SA: many minor changes / comments suggested by the SA have been incorporated directly into the AAP without being formally documented.

Initial SA Report of April 2011 (alongside Preferred Options Document)

The SA report of April 2011 assessed the impact of a range of options and recommended mitigation and enhancement measures for the preferred options. Table 3.1 shows that most of the mitigation measures have been implemented.

Table 3.1: Mitigation measures proposed in April 2011 Initial SA Report

Proposed mitigation measure (task B5)	Relevant AAP policies	Were the mitigation measures implemented?
Flooding: The restriction of development from land liable to flood; and therefore preferred approaches to create linear park, and SUDS programme of measures if fully implemented would significantly reduce risk of flooding. Overall effects therefore could range between +/- depending on implementation	BA4: Public open space; BA15: Flooding; BA16 Surface water drainage	Yes - A Flood Risk Assessment (CD2.9); Sewer Impact Study (CD2.11) and Surface and Foul Water Drainage Overview (CD2.12) were carried out; and a Statement of Common Ground with the Environment Agency was signed through which the EA were satisfied with the AAP approach
School provision: Cost of provision could be considerable, so to improve viability of scheme a possible mitigation could be to consider the timing of the provision in relation to the phasing of the development. This would however be dependent on the capacity existing schools in the area.	BA11: Community hub; BA14: Delivery	Yes –BA14: delivery provides for temporary provision if appropriate and the developer Barton Oxford LLP and the County Council are in discussions around the timing of provision of the school
Reducing crime: Design principles should improve layouts and public areas, and regeneration of area should contribute to achieving this objective.	BA4: Public open space; BA13: Design;	Yes – BA4 requires development fronting open space to consider safe access. BA13 requires the Design Code to incorporate “secured by design” principles.
Culture, leisure and recreation: The impacts are generally positive in the new facilities provided, but their wider dual-use should be encouraged to achieve greater benefits. Use of open space should be protected if possible or adequately	BA2: Recreation ground; BA3: allotments BA4:Public open space BA11: Community hub	Yes – BA2,3 and 4 require retention of much of the existing open space and re-provision of the rest; BA11 seeks community use of buildings and

Proposed mitigation measure (task B5)	Relevant AAP policies	Were the mitigation measures implemented?
replaced elsewhere.		playing pitches outside school hours
Air pollution: Assessments are required to show the impact on air quality of physical transport improvement options, since there is potential for some negative impacts.	BA1: The ring road	Yes - Further transport assessments have been carried out (CD7.18) and BA1 requires measures to reduce need to travel
Climate change: The mitigation relies on the implementation of the principles of innovative and responsive design.	BA12: Energy efficiency; BA13: Design	Yes – BA12 and 13 require energy efficiency, at least 20% renewable energy and sustainable construction and design
Biodiversity: The mitigation requires the protection and enhancement of Baywater Brook; together with a programme for its implementation. Further studies on impact on biodiversity needed.	BA4: Public open space; BA19: Sidings Copse and College Pond SSSI	Yes – BA4 requires linear park along Bayswater Brook; BA19 requires an impact avoidance plan. The developer has been carrying out further studies
Countryside and historic environment: Given the positive nature of these impacts, mitigation relies on implementation and need to protect routes to ensure integration within masterplanning.	BA5: Sustainable travel; BA7: Pedestrian and cycle links; BA13: Design; BA19: Sidings Copse and College Pond SSSI	Yes – BA5,7 and 13 require excellent links and connections into and out of the city
Road congestion and reducing the need to travel: There is a need for further assessments of the potential negative impact of congestion from new junction and slower traffic speeds on air pollution.	BA1: The ring road; BA5: Sustainable travel	Further transport assessments have been carried out (CD7.18) and BA1 and 5 require package of measures to reduce need to travel
Use of natural resources: Mitigation through implementation of best practise set out in the innovation and responsive design principles.	BA12: Energy efficiency; BA13: Design	Yes – BA12 and 13 require energy efficiency, at least 20% renewable energy and sustainable construction and design
Water and soil quality: Mitigation would rely on protection and enhancement of Bayswater Brook, and principles set out in innovation and responsive design; promoting best practise including SUD's.	BA4: Public open space; BA16: Surface water drainage; BA17: Water supply and wastewater drainage	Yes – BA4, 16 and 17 require a package of measures to protect and enhance water and soil quality. A Statement of Common ground has been signed with the Environment Agency and Thames Water.
Energy efficiency and renewable energy: Mitigation would be in the form of an effective implementation of the innovative and responsive design principles.	BA12: Energy efficiency; BA13: Design	Yes – BA12 and 13 require energy efficiency, at least 20% renewable energy and sustainable construction and design

SA Update Report of February 2012 (CD1.10) (alongside Proposed Submission Document)

The SA Update Report of February 2012 assessed those new or amended policies in the Proposed Submission Document (those that had not been assessed at the previous stage). The assessment predicted the effects of the new policies and recommended mitigation where appropriate. Table 3.2 identifies those policies where additional mitigation measures were proposed.

Table 3.2: Assessment of new and amended policies in the Proposed Submission Document

New or amended policy	Findings of the SA Update Report	SA reflected in final policy?
BA3 Allotments	The no policy approach, retains as existing, and has positive biodiversity and sustainability benefits. The new policy would allow for the uncultivated land to be built upon and still seeks its replacement with land for community use 'linked to food cultivation' elsewhere on the strategic development site; but ultimately still depends on implementation.	Yes
BA5 Sustainable travel	This new policy comprising a sustainable package of measures should reduce air pollution by promoting alternative modes of travel other than the car and reducing parking. It does however require further air quality assessments and travel plans to be submitted to ensure this is achieved. The measures such as improved bus services and a new junction should bring positive benefits by integrating the new development with the surrounding area.	Yes
BA8 Housing mix	The new policy is largely based on the Core Strategy policy on mix of dwellings supported by Balance of Dwellings SPD. It makes a slight change to the percentage mix showing a lower requirement for 1 bed and an increase for 4 bed units. The 3 bed requirement critical in BOD's however remains the same. Overall 'family housing' provision would be increased slightly. The policy does make the mix explicit as part of a specific policy. The wording of the policy clearly requires the mix to be considered in both phasing and the overall development of site. The policy is important in setting out the mix which will make a significant contribution to both urban renaissance and the creation of vibrant sustainable community.	Yes
BA14 Delivery	The new policy sets out in detail the infrastructure requirements, includes a range of new facilities together with transport links, drainage and flood prevention and sets out clearly the intended mechanisms for delivery through section 106 and phasing. This should bring key sustainable benefits by increasing the prospects of delivering the new land uses and necessary infrastructure to support them.	Yes
BA15 Flooding	This new Policy was specifically required by the Environment Agency as a Statutory Consultee, but the content which requires a Flood Risk Assessment (FRA), does not increase the risk of flooding and the implementation of mitigation measures does not in practise differ significantly from Policy CS11 in the Core Strategy. This policy links implementation and mitigation with the effective delivery of the necessary infrastructure.	Yes
BA16 Surface water drainage	This new Policy was specifically required by the Environment Agency as a Statutory Consultee, it does add further detail relevant to the efficient development of this strategic site which will ensure that a sustainable integrated approach is taken to the surface water drainage system. This policy links implementation and mitigation with the effective delivery of the necessary infrastructure.	Yes
BA17 Water supply and waste water drainage	This new policy was specifically required by the Environment Agency as a Statutory Consultee and Thames Water. It requires a water supply and drainage strategy to be linked to planning conditions and phasing. This policy links	Yes

	implementation and mitigation with the effective delivery of the necessary infrastructure.	
BA18 Land remediation	This new policy was specifically required by the Environment Agency as a Statutory Consultee, it is likely to have a positive effect by requiring further investigation to be carried out through a land contamination assessment. These findings need to show that the land is capable of remediation, before a package of mitigation measures can be agreed and implemented.	Yes
BA19 Sidlings Copse and College Pond SSSI	This new policy was specifically required by Natural England as a Statutory Consultee, it requires a further assessment to mitigate any adverse impacts on the SSSI from additional recreational pressure. These findings need to be used to inform a package of mitigation measures that can be agreed and implemented.	Yes
BA20 Linking local people to economic opportunities	The new policy positively responds to key sustainability objectives and seeks to create new jobs, apprenticeships and training opportunities which would benefit local people. This policy clearly links implementation and mitigation with the effective delivery of its key aim to provide greater economic opportunities for local people.	Yes

Addendum to the SA Report of July 2012 (CD7.23) (alongside Proposed Main Modifications)

The Inspector appointed to examine the Barton AAP proposed some Main Modifications, and asked the City Council to produce an addendum to the SA report to appraise those Main Modifications that had not previously been assessed and to carry out another SA of the Ruskin Fields proposals. The SA addendum of July 2012 considered only those proposed changes that could have significant impacts that had not previously been appraised:

- MM1: Model Policy 4
- MM4: Proposed changes to Policy BA1
- MM6: Proposed changes to Policy BA7
- Ruskin Fields

There were no significant mitigation measures proposed by the SA in relation to MM1, MM4 and MM6. The SA of the Ruskin Fields proposals concluded that the "do-nothing" option was the preferred option and as such no mitigation measures were proposed.

Inspectors' Report of December 2012

The SA reports were part of the evidence presented by Oxford City Council at the Examination stage. Planning Inspector Dr Shelagh Bussey reviewed the reports and concluded that:

"…The SA process is generally satisfactory, except for its appraisal of a residential proposal for land at Ruskin Fields within the Old Headington Conservation Area. This proposal was first put forward in response to the Council's call for sites for the separate Sites and Housing Plan and possible links to the AAP. It was carried forward to the Preferred Options stage of the AAP and was SA tested. As a consequence of the conclusions of that SA it was not carried forward to the submission plan.

"However, it is not clear from the SA process that all of the most up-to-date evidence submitted by the promoters of the Ruskin Fields site was taken into account. Consequently, it is unclear if the Council's decision not to carry the proposal forward in the AAP is based upon robust evidence and transparent reasons. To rectify this weakness in the SA process, the SA of the Ruskin Fields site was

re-run and subjected to public consultation during the examination period [CD7.23]. Several suggested schemes have been submitted for residential development, including 50% affordable housing, and provision for public open space at Ruskin Fields, all of which fall within the two options that were re-assessed in the addendum SA. The larger option assessed is for between 175-193 dwellings and smaller is for around 70 homes.

"Consideration of these options at the hearings sessions was deferred until after the completion of the further SA work and consideration of the public consultation comments upon it at a meeting of the full Council on 20 September 2012.

"The scoring of the two options against some of the SA objectives has been challenged. I agree that the significantly negative score given for both options in respect of SA objective 13: to conserve and enhance Oxford's biodiversity, is not supported by the evidence, which indicates that both options, particularly the smaller, would have a less damaging impact than that indicated in the SA. However, I consider that all of the other SA objectives have been scored appropriately and, for the reasons that I give below, the decision to reject the option of development at Ruskin Fields remains sound."

The Inspectors' report recommended some limited changes to policies of the AAP, including modifications to policies BA1 and BA7. The Inspector concluded that the *"SA has been carried out and is adequate."* And *"I conclude that the SA has been made demonstrably robust by the additional testing of the two main options for proposed development at Ruskin Fields, that all feasible options have been properly tested and that the reasons why some options have been rejected have been clearly stated."*

4. HOW THE OPINION OF STATUTORY BODIES AND THE PUBLIC HAVE BEEN TAKEN INTO ACCOUNT

As was discussed in Section 2, successive rounds of SA report were prepared and made available to statutory consultees, neighbouring local authorities and the public as the AAP evolved. All the documents were put on Oxford City Council's website. Overall, few responses to these reports were received. The responses, and changes made to the SA and AAP in response, are discussed below.

Scoping Report of June 2010 (CD1.9) (alongside Issues Document)

Consultation on the scoping report was from 11 June - 23 July 2010. The following organisations were consulted regarding the scoping report:

- Statutory Consultees - Environment Agency; English Heritage; Natural England
- Other bodies considered appropriate to consult at this stage - Government Office for the South East**;** South East England Partnership Board**;** Oxfordshire County Council**;** Cherwell District Council**;** South Oxfordshire District Council**;** West Oxfordshire District Council**;** Vale of White Horse District Council

Natural England, the Environment Agency, Oxfordshire Green Party, the Berkshire Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT) and Mr M Pitt responded with a range of relatively minor recommendations.

The comments received were documented and considered and will be used to inform subsequent issues of the Scoping Report relating to other Plans. For example, a review of the list of relevant plans, policies and programmes and the baseline information will be carried out for the next SA Scoping report incorporating where appropriate the new documents and sources identified by the respondents.

Initial SA Report of April 2011 (alongside Preferred Options Document)

The Initial SA Report of April 2011 was published alongside the Barton AAP Preferred Options Document for consultation. Again the above listed statutory and appropriate bodies were contacted and the SA was drawn to the attention of all those consulted as part of the Preferred Options consultation. Five respondents submitted comments on the Initial SA Report: Oxfordshire County Council, Ruskin College, New Marston (South) Resident's Association, Mr M Pitt and Mr S Gerrish.

The County Council commented that the SA stated that no ecological surveys had been carried out on the Ruskin College site; they requested that the SA include the potential benefits of for wildlife and the local community which could be achieved within the nearby Oxford Heights East Conservation Target Area. Further studies were completed by Ruskin College on the ecology of their site; these were used in the Addendum to the SA of July 2012 (see below).

Ruskin College commented that while they acknowledged there was a need for more survey work it felt that the SA had been unduly negative and not consistent with the SA assessment of the Barton

site. This position was maintained by the College through the examination; further work was carried out in the Addendum to the SA of July 2012 (see below).

New Marston (South) Resident's Association listed a range of potential impacts that the new development may have on their area and which should be resolved prior to development; Mr Pitt made comments regarding sustainable communities and the development of a large number of affordable homes in an area with existing deprivation issues and on the edge of the city; and Mr Gerrrish commented that the SA should mention the requirement of the Code for Sustainable Homes. In terms of these comments, the policies of the AAP make it clear that no permission will be granted for the development that would lead to increased risk elsewhere and the AAP also makes reference to the Code for Sustainable Homes.

SA Update Report of February 2012 (CD1.10) (alongside Proposed Submission Document)

The SA Update Report of February 2012 was published alongside the Barton AAP Proposed Submission Document for consultation. Again the above listed statutory and appropriate bodies were contacted and the SA was drawn to the attention of all those consulted as part of the Proposed Submission consultation. One respondent submitted comments on the Initial SA Report: Ruskin College. Ruskin College submitted that the SA was not legally compliant, that it had not fully taken into account submitted evidence and had not been even handed in assessing the proposals at Ruskin and at Barton.

The City Council took advice and considered that it had complied with the requirements for the process. However during the examination the Inspector asked for an addendum to the SA report to be carried out with a fresh assessment of the Ruskin College proposals with the best available evidence (see below).

Addendum to the SA Report of July 2012 (CD7.23) (alongside Proposed Main Modifications)

21 respondents submitted comments regarding the addendum to the Sustainability Appraisal for the Barton AAP. Comments were received from: English Heritage; Stoke Place Resident's Association; Friends of Old Headington; The Berkshire, Buckinghamshire & Oxfordshire Wildlife Trust (BBOWT); Ruskin College; Ruskin College Charity; Professor A Mullender; Oxfordshire Green Party; Oxford Civic Society; Campaign to Protect Rural England; Oxford Preservation Trust; Network Rail; Barton Community Association; Mr R Grimley, Mr J Lithgow, Mr A Nath, Mr M Pitt, Dr Z Traill, Mr and Mrs Hurst, Mr & Mrs Davis, and Ms G Rowsell.

The majority of comments concerned the Ruskin College proposals. 11 respondents expressed support for the conclusions of the Sustainability Appraisal Addendums in not allocating the land at Ruskin Fields for development. However, 3 parties representing Ruskin College made representations that the Sustainability Appraisal had used unfair scoring that did not fully represent the benefits and impacts of the proposals and that the SA addendum had not assessed the proposals in the same manner as had been used for the strategic site at Barton which had resulted in a biased conclusion against the Ruskin College proposals. This line of representation was also taken by a fourth respondent in this matter; 1 respondent registered their support for the smaller scheme proposed by Ruskin College and 1 respondent felt that the do-nothing option would result in an unacceptable policy gap.

There were however a few comments regarding other elements of the Barton addendum: 2 respondents addressed the assessments of MM4 and MM6. One respondent suggested that the SA did not adequately reflect the changes to the number of crossings proposed and the other that it didn't properly consider the impacts on the historic environment. In addition one further respondent queried lack of testing of a 50mph option on the ring-road. The City Council have carried out an additional assessment of the sustainability impacts of a 50mph speed limit to address this point (CD7.27). Concerns over the scoring were also raised by one respondent with regard to the potential biodiversity value of Stoke Place and another with regard to the biodiversity value of the strategic site at Barton.

The comments received at this stage of the process were considered directly by the Inspector and were addressed in her report.

Update to the Addendum for the SA of September 2012 (CD7.27) (during the examination)

This minor update was before the September hearings of the examination although not subject to specific consultation. No comments were made on this minor update during the hearings. This information was available for the Inspector to consider in writing her report.

5. THE REASONS FOR CHOOSING THE PLAN AS ADOPTED, IN THE LIGHT OF OTHER REASONABLE ALTERNATIVES DEALT WITH

Different alternatives (or options) were considered at different stages of the AAP process, and were assessed and compared as part of the SA process. Oxford City Council's Main Matter 1 Response (CD7.13.1) explains how options were developed, assessed and chosen during the development of the AAP. The Consultation Statement (CD1.13) sets out how issues raised at earlier stages of production were addressed and carried forward into the Submission AAP. The Update Sustainability Appraisal Report of February 2012 describes what options were rejected early in the SA process and not subject to full appraisal, what other options that were subject to full appraisal, and the reasons for choosing the 'preferred options' of the SA.

The Core Strategy allocated the site at Barton as a strategic development site for residential with supporting amenities. This allocation formed the basis of the AAP and therefore restricted the range of options considered. Options that were *not* considered included options contrary to national guidance and emerging regional policy, and policy CS7: Land at Barton of the Core Strategy. Table 5.1 shows, for each Barton AAP topic, the options that were considered in the production of the Preferred Options Document, the findings of the SA, the options that were presented in the Preferred Options Document, and the final AAP policy. The blue highlighting indicates which options were finally chosen for the AAP. In the final column, it summarises the SA's comparison of the options.

Table 5.1: Options considered in the SA, and information about the choice of preferred option

Topic	Options considered during production of Preferred Options Document	Summary of findings from options comparison in the SA Report	Options presented at Preferred Options Stage	Final policy of Barton AAP
Affordable housing	**Option 1:** City-wide affordable housing target of at least 50% **Option 2:** Minimum affordable housing target for the development site of 40%, with 100% of this requirement as social rented homes	The SA shows that affordable housing is important both to this development, Barton and the wider provision within Oxford. Whilst option 1 scores higher in providing more affordable housing and a better mix of ownership creating potentially a more balance community; initial viability assessment suggests that this may not be deliverable.	**Preferred Approach:** a minimum target of 40%, all social rented homes.	**BA9: Affordable Housing**
Local centre	**Option 1:** non-site specific location **Option 2:** non-site specific but subject to some spatial criterion **Option 3:** site specific location	The SA shows Option 2 provides the greater positive sustainable benefits. In providing a spatial focus for the local centre, this would achieve a better layout, potentially reduce the need to travel making the centre more accessible by public transport.	**Preferred Approach:** a local centre comprising a primary school, community and recreation facilities, some retail units, and housing.	**BA10: Local Centre**

Local centre	**Option 1:** non-site specific location **Option 2:** non-site specific but subject to some spatial criterion **Option 3:** site specific location	The SA recognises the importance of providing a new Primary School on this site. The overall spatial difference between the options is not significant. The key factor is the positive benefits it can bring to a range of SA objectives.	**Preferred Approach:** a school of around 2 hectares, offering potential for a range of social and community uses encouraging walking and cycling to school	**BA11: Community Hub**
Retail uses	**Option 1:** non-site specific location **Option 2:** includes larger food store as part of local centre **Option 3:** small shops as part of local centre **Option 4:** no provision	The SA highlights the principal differences between Options 1& 3, and Option 2. Option 1& 3 (small shops) are likely to be more sustainable in providing for the additional retail needs to the new local community and adjacent Barton residents. Whilst Option 2 (large food store) would be likely to serve a larger catchment area and therefore draw customers form to the area, having potential traffic implications. Depending on the scale of retail floorspace proposed it could also impact on the future vitality and viability of existing District centres, such as Headington.	**Option 1:** Local shops and services forming part of a new local centre **Option 2:** Local shops and services, with a larger food store forming part of a new local centre	**BA10: Local Centre**
Recreation ground	**Option 1:** retain in present position **Option 2:** retain on site but realign **Option 3:** relocate recreation uses **Option 4:** relocate recreation uses on specific part of site	The SA shows that Options 2 & 3 in offering some flexibility could potentially maximise the efficient use of land; create sustainable communities; and provide better integration which would be likely to achieve the delivery of regeneration benefits.	**Option 1:** Retain the recreation ground and the sports pitches in their current location **Option 2:** Retain the recreation ground and the sports pitches on their current site, but re-orientate to east-west **Option 3:** Relocate the recreation ground use	**BA2: Recreation Ground**
Allotments	**Option 1:** retain statutory allotments as existing **Option 2:** retain cultivated allotment relocate non-cultivated **Option 3:** retain the amount of land for allotments but relocate	Option 1 has positive biodiversity and sustainability benefits. Options 2 & 3 depend on implementation but provide opportunities to retain in part or create new sites where biodiversity can be promoted. These options also allow the potential for more net residential development to be provided.	**Preferred Option:** Retain the currently cultivated allotment land and replace the uncultivated allotments with land of equivalent quality and accessibility **Alternative Option:** Retain the whole of the allotment land in its current location	**BA3: Allotments**

Linear park	**Option 1:** do nothing to Bayswater Brook corridor **Option 2:** create a linear park	Option 2, the creation of a linear park makes a positive use of this land for a recreational / leisure use which represents a significant contribution to the formation of sustainable and vibrant communities. It conserves and enhances biodiversity and provides an opportunity to secure greater access to the countryside; whilst allowing for the proper maintenance of Bayswater Brook.	**Preferred Approach:** develop homes on the land occupied by Barton Village Nature Park and to create a linear park along Bayswater Brook.	**BA4: Public Open Space**
Treatment of the A40	**Option 1**: do nothing **Option 2:** reduce traffic speed to 40mph **Option 3:** reduce traffic speed to 40mph and create street frontage	Option 3 makes a significant contribution to urban renaissance and good design. It positively integrates the new development with Barton and the rest of the city; and will help to create and sustain vibrant communities. Both Options, 2 & 3 have the potential to improve air quality by reducing traffic speeds; however there is a need for further assessments to be carried out to show how the creation of a new junction on the A40 would impact on road congestion. Since increased traffic congestion levels could adversely impact on air quality.	**Alternative Option 1:** Leave the ring-road as it is, with speeds of 70 mph **Alternative Option 2:** Reduce speeds on the ring-road to 40 mph but with no new frontages **Preferred Option (3):** Transform the ring-road into a street with new frontages and speeds reduced to 40 mph	**BA1: The Ring Road**

Main vehicle access from the ring-road	**Option 1:** Signal controlled junction to ring road, with bus-only link **Option 2:** Left in left out junction **Option 3:** New traffic signal roundabout **Option 4:** do nothing	Option 4, would rely only on access from Barton, and Option 2 would both have a negative impact on SA objectives. Options 1 & 3 either a new junction or roundabout offer the most sustainable approaches, although this does depend on implementation and may have potentially different impacts on air quality and traffic congestion. Whilst Option 1 shows slightly better benefits in terms of urban renaissance and greater opportunities for integration; there are concerns over potential impacts on air pollution through possible congestion. Option 3 does use more land and will not link to other areas as well, but may be able to allow traffic to keep moving and therefore reduce potential impact on air quality. It does require further assessments to be undertaken on the impacts of Options 1 & 3 on traffic movements, possible congestion and effect on air quality.	**Option 1:** Signal-controlled junction to ring-road (left and right in and out), incorporating bus-only link into Northway **Option 2:** Left-in/left-out junction to ring-road **Option 3:** Roundabout(s) on ring-road	**BA1: The Ring Road** **BA6: Vehicle Access**
Secondary vehicle access from Barton	**Option 1:** Fettiplace Road **Option 2:** Barton Village Rd / Fettiplace Rd **Option 3:** Barton Village Rd / North Way **Option 4:** do nothing	Option 4 (do nothing) has a negative effect on key objectives, such as achieving a good layout and proper integration; which are essential to the creation of sustainable and viable communities. The other options show Option 1 to be slightly better; but overall importance is to secure a vehicular access from Barton to the development site. The choice between options 1-3 should be subject to further detailed assessment to determine the most suitable.	**Option 1:** in line with Fettiplace Road, altering existing T-junction to form a crossroads **Option 2:** about 50-metres to the south of Barton Village Road/ Fettiplace Road junction, via a priority junction **Option 3:** to the north of Barton Village Road/ Fettiplace Road junction, via a new junction **Option 4:** at the junction of Barton Village Road/ North Way, via a new junction	**BA6: Vehicle Access**

Bus access	**Option 1:** no change to existing services **Option 2:** extension of existing bus services from Barton and or Northway **Option 3:** Revised or new bus service	Option 2 offers the opportunity to extend the existing bus services in Barton and potentially Northway; through the proposed new junction. Provides positive benefits in increasing accessibility and creating better integration. This could represent a Preferred option in the short-term. Option 3 offers the potential to revise the present service or create a new service linking Northway, the development site, Barton and other areas of the city. It represents the preferred option but could be subject to timescale implications and may only be viable in the longer-term.	**Alternative Option 1:** No change to existing bus services **Alternative Option 2:** Extension of existing bus services from Barton and/or Northway but with no direct connection between the two routes **Preferred Option (3):** A revised or new service connecting Northway, the development site and Barton with other parts of the city, with flexibility built in to allow option 2 to be implemented if necessary.	**BA5: Sustainable Travel** **BA6: Vehicle Access**
Cycle / pedestrian links across the A40	**Option 1:** access as part of signal controlled junction **Option 2:** Foxwell Drive crossing **Option 3:** Stoke Place **Option 4:** Barton Lane **Option 5:** no change	All options positively promote sustainable means of travel, encourage greater integration, and will promote a good urban design layout. It is to be hoped that more than one option would be implemented. Options 1 & 3 however appear to offer the most significant benefits in creating new and improved links to the surrounding areas, both existing settlements, Headington and Northway and extending opportunities to the countryside.	**Alternative Option 1:** Access as part of a signal-controlled junction **Alternative Option 2:** Crossing to Foxwell Drive **Preferred Option (3):** Crossing at Stoke Place with option 1 providing an extra but secondary crossing. **Alternative Option 4:** Crossing towards open fields at Barton Lane	**BA7: Pedestrian and Cycle Links**
Design	**Option 1:** package of design guidelines **Option 2:** do nothing but rely on Core Strategy policies	Both options contain advice on urban design and the sustainable use of energy and materials. Option 1 however probably provides the more complete package of design policies which could be built on to offer site specific advice to promote the sustainable development of this site.	**Preferred Approach:** a set of six design principles **Preferred Approach:** meet the CABE-Home Builders Federation 'Building for Life' Standard at gold level.	**BA13: Design**

In most cases, the preferred, most sustainable option from the SA was also chosen as the basis for the AAP policy. However in a few cases, the final AAP incorporates a different option from the SA preferred option.

- Treatment of the A40
  Policy BA1 was the single most debated policy at the AAP examination. The work at Preferred Options had identified that reducing the speed limit of the A40 ring-road to 40mph and designing development to face the road would be the most sustainable option in terms of making a significant contribution to urban renaissance and good design, positively integrating the new development with Barton and the rest of the city, and helping to create and sustain vibrant communities. However there were objections to this approach including from the County Council and so the policy was amended to remove references to 40mph but still seek a reduction in the speed limit and to no longer require development to face the ring-road. These amendments to the policy would make it much more likely to be deliverable.

- Secondary vehicle access from Barton
  Policy BA6 requires: "One further all-vehicle access point to the strategic development site should be provided from Fettiplace Road, with a potential access point to the south on Barton Village Road." This policy is in part option 1 from the Preferred Options Document, and in part option 2. The SA had found that overall option 1 was better.

- Cycle / pedestrian links across the A40
  The Preferred Option was to provide a crossing at Stoke Place with a crossing at the new junction providing an extra but secondary crossing. Policy BA7 again was debated in detail at the AAP examination. The final wording of Policy BA7 requires a crossing within the new junction, an upgrading of the existing crossing between Barton and Headington and states that: "There may be an opportunity to re-connect Stoke Place bridleway with the existing footpath running north-south across the strategic development site." This policy approach is in essence the preferred option (option 3) from the Preferred Options Document although the Inspector considered that the Stoke Place crossing should be expressed as an opportunity rather than a requirement.

6. MEASURES TO BE TAKEN TO MONITOR THE SIGNIFICANT SUSTAINABILITY EFFECTS OF THE IMPLEMENTATION OF THE BARTON AAP

The Environmental Assessment of Plans and Programmes Regulations 2004 require local authorities to "monitor the significant environmental effects of the implementation of each plan or programme with the purpose of identifying unforeseen adverse effects at an early stage and being able to undertake appropriate remedial action."
A detailed framework has been prepared to monitor the implementation of the Barton AAP. This framework covers most of the significant environmental, social and economic effects of implementing the strategy. The SA process has suggested a limited number of additional monitoring indicators.

Table 6.1 shows the monitoring indicators that aim to measure likely effects of the AAP, targets to be achieved, and where the monitoring will take place and be reported. In most cases the monitoring will be carried out by the City Council and the results will be reported in the Annual Monitoring Report in December each year.

Table 6.1: SA Monitoring Framework

Sustainability Objective	Indicator	Target	Where monitored?
Flooding	Properties at Risk from Flooding	Reduce	Barton SA Scoping Report and SA Scoping Report
	Permission contrary to advice of the Environment Agency	0% of planning permission to be contrary to the advice of the Environment Agency	AMR Indicator 22
Urban Renaissance	Proportion of people who feel they belong to their local neighbourhood.	Increase	SA Scoping Report – National Indicator 2
Decent and Affordable Homes for all	Provision of affordable housing and affordable housing required per 1000 dwellings	Increase	AMR Indicator 6
	Average property price compared with average earnings	Contextual Indicator: Aspirational target to reduce house prices in line with earnings	Barton SA Scoping Report and SA Scoping Report
Health and Well-Being	Health deprivation and disability score in future indices of deprivation	Improve	Barton SA Scoping Report and SA Scoping Report
Educational achievement	Proportion of adults (16+) with no qualifications or with poor literary/ numeracy skills	Improve	Barton SA Scoping Report and SA Scoping Report
	Proportion of pupils achieving 5 GCSEs A*-C or NVQ equivalent	Improve	Barton SA Scoping Report and SA Scoping Report

Sustainability Objective	Indicator	Target	Where monitored?
Reduce Crime and Fear of Crime	Levels of domestic burglaries, violent offences and vehicle crimes	Reduce	Barton SA Scoping Report and SA Scoping Report
	Levels of disparity between crime levels and different parts of Oxford	Reduce	Barton SA Scoping Report and SA Scoping Report
	Fear of Crime	Reduce	Barton SA Scoping Report and SA Scoping Report
Create and Sustain vibrant communities	Mix of market housing by house size in respect of (i) market; and (ii) affordable	BODs SPD compliancy – 100%	AMR Indicator 5
Accessibility of essential services and facilities	Distance from key services, e.g., Post Office, schools, doctors	Ensure that all residents are within 30 minutes public transport travel time of key services	AMR Indicator 33
Accessibility of leisure, culture and recreation	Access to and the use of open spaces and leisure facilities	As a city wide average ensure that 5.75ha open space is maintained per 1,000 population	AMR Indicator 33
	Provision and improvements of local facilities	Increase/ improve	AMR Indicator 33
Reduce Air Pollution where possible	Carbon Monoxide	Reduce	SA Scoping Report
	Nitrogen Oxides	Reduce	SA Scoping Report
	PM10	Reduce	SA Scoping Report
	Lead	Reduce	SA Scoping Report
	Ozone	Reduce	SA Scoping Report
Conserve and Enhance Biodiversity	Quality and improvement of SSSI/ % of SSSI in unfavourable condition	Improve	SA Scoping Report
Road congestion and pollution	Averaged daily motor vehicle flows	Reduce	Monitored by the County Council as part of the LTP obligations
	Reduce congestion	Reduce	Monitored by the County Council as part of the LTP obligations
Reduce waste and improve management	Household waste recycled (% of total)	Increase	Best Value Indicator 82a(i)
	% of household waste arising that is composted (does not include home composting)	Increase	Best Value Indicator 82b(i)
	Kg of household waste collected per head	Reduce	Best Value Indicator 84a
Water resource management	Chemical river water quality	Improve	SA Scoping Report
	Biological river water quality	Improve	SA Scoping Report
	Per capita consumption of water	Stabilise and reduce	SA Scoping Report
Energy efficiency	Installed capacity for energy for production from renewable sources	Increase	AMR Indicator 24

Sustainability Objective	Indicator	Target	Where monitored?
	Energy efficiency of dwellings by English Region (SAP rating)	Increases average rating	Best Value Indicator 63
Skills in workforce	% of population of working age qualified to NVQ level 3 or equivalent and above (ie. two or more A levels, advanced GNVQ)	Increase	SA Scoping Report
Sustain high and stable employment	Proportion of people of working age in employment	Increase	SA Scoping Report
	Proportion unemployed	Reduce	SA Scoping Report
	Proportion of people claiming Jobseekers allowance out of work for more than a year	Reduce	SA Scoping Report
Sustain economic growth	GVA per capita	Increase	SA Scoping Report
Stimulate economic revival in regeneration areas	Proportion of people in Barton area of working age in employment population	Increase	Barton SA Scoping Report

7. HABITATS REGULATIONS ASSESSMENT

Habitats Regulations Assessment involves up to four consecutive stages, with the conclusions of each stage determining whether the next stage is required:

1. Screening: Determining whether the plan - 'in combination' with other plans and projects - is likely to have an adverse effect on a European site
2. Appropriate assessment: Determining whether, in view of the site's conservation objectives, the plan - 'in combination' with other plans and projects - would have an adverse effect (or risk of this) on the integrity of the site (s). If it doesn't, the plan can proceed
3. Assessment of alternative solutions: Where the plan is assessed as having an adverse effect (or risk of this) on the integrity of a site(s), there should be an examination of alternatives.
4. Assessment where no alternative solutions remain and where adverse impacts remain

Oxford City Council undertook a Habitats Regulations Assessment (HRA) "in-house", with auditing undertaken by Levett-Therivel Sustainability Consultants. The Stage 1 Screening Report was published in February 2012 (CD1.11).

The Screening Report concluded that: "the Oxford Meadows SAC is currently judged by Natural England to be in a favourable condition. This Habitat Regulations Assessment has concluded that none of the policies in the Barton Area Action Plan are likely to have adverse effects on the integrity of the Oxford Meadows SAC either alone or 'in-combination' with other plans or projects."

Natural England wrote to the City Council in January 2012 to concur with the conclusions of the assessment (appended to CD1.11). On this basis there was no requirement to carry out stages 2, 3 or 4 of the HRA process.