

# BRIGHTWELL-CUM-SOTWELL PARISH NEIGHBOURHOOD PLAN MODIFICATION PROPOSAL

2011 – 2035

## DRAFT SUSTAINABILITY APPRAISAL ADDENDUM (incorporating a Strategic Environmental Assessment)

**Brightwell cum Sotwell**  
Neighbourhood Plan



Published by Brightwell-cum-Sotwell Parish Council to accompany the Modification Proposal of the Brightwell-cum-Sotwell Parish Neighbourhood Plan for Regulation 14 consultation under the Neighbourhood Planning (General) Regulations 2012 (as amended) and in accordance with the Environmental Assessment of Plans & Programmes Regulations 2004.

March 2022

## **NON-TECHNICAL SUMMARY**

1. This report is an Addendum to the Brightwell-cum-Sotwell Parish Neighbourhood Plan 2016 – 2032 Sustainability Report (incorporating a Strategic Environmental Assessment) (“SA/SEA Report”) of February 2017. The Addendum is considered necessary to ensure that the modifications proposed in the Modification Proposal of the Brightwell-cum-Sotwell Parish Neighbourhood Plan (“the Modification Proposal”) are appropriately considered for any significant social, environmental and economic effects in accordance with the Environmental Assessment of Plans & Programmes Regulations 2004. This addendum should be read alongside the Final SA/SEA Report published in February 2017, as relevant.

2. The main purpose of the Addendum is to present an appraisal of the proposed modifications, rather than the Modified Plan as a whole. However, consideration is given to the cumulative effects of the modifications in terms of their overall influence across the entirety of the Neighbourhood Plan, where appropriate.

3. The Modification Proposal seeks to modify 10 existing policies and add 4 new policies of the made Brightwell-cum-Sotwell Neighbourhood Plan (“the Neighbourhood Plan”). One policy has been deleted as a scheme has been approved and built. The Modification Proposal has been approved by the Qualifying Body, Brightwell-cum-Sotwell Parish Council (“the Parish Council”) for Regulation 14 consultation under the Neighbourhood Planning Regulations 2012 (as amended).

4. The Addendum ensures that the Modified Plan will meet the ‘basic conditions’ in respect of showing how the policies contribute to the achievement of sustainable development and of complying with the Environmental Assessment of Plans & Programmes Regulations 2004.

5. The proposed modifications are not considered to change the nature of the Neighbourhood Plan as detailed in the Modification Statement. The main sustainability issues in the Parish remain, although the provisions of the Neighbourhood Plan have resulted in the affordable housing need identified now having been met. The proposed modifications are intended to ensure the continued deliverability of the Neighbourhood Plan and to improve clarity for more effective implementation.

6. There have been changes to national planning policy with the National Planning Policy Framework of July 2021 and the South Oxfordshire Local Plan was adopted in December 2020. However, neither are considered to make a material difference to the scope of sustainability objectives used in 2017 and this Addendum therefore continues to apply the SA Framework established in the Final SA/SEA Report.

7. The assessment indicates that the majority of the effects of the preferred modifications to the Neighbourhood Plan will be neutral, but with important positive effects in some cases. However, there remains potential for some negative effects, but such effects have been addressed through avoidance or mitigation measures.

8. Having tested the ‘no policy’ option, it does not seem likely that the alternative will lead to a better sustainability outcome than the proposed modifications. In some cases, notably in respect of design effects, the alternatives assess less well.

9. It can therefore be concluded that the Modification Proposal contributes to the

achievement of sustainable development when considered against its reasonable policy alternatives and does not have the potential for significant negative effects.

10. The Revised Habitat Regulations Assessment (HRA) Screening Determination of March 2017 concluded that the Neighbourhood Plan will not have potential significant effects on Natura 2000 sites and, therefore, an Appropriate Assessment for the Neighbourhood Plan was not required in accordance with the Conservation of Habitats & Species Regulations 2017 (as amended). There have been no changes since to the evidence base in respect of those Natura 2000 sites and the proposed modifications are not considered to change the nature of the plan, as set out in the Modification Statement accompanying the Modification Proposal. It is therefore considered that there has been no change in the scope of the Neighbourhood Plan that would lead to a different conclusion

# **I. INTRODUCTION**

I.1 This report is an Addendum to the Brightwell-cum-Sotwell Parish Neighbourhood Plan 2016 – 2032 Sustainability Report (incorporating a Strategic Environmental Assessment) (“SA/SEA Report”) of February 2017. The Addendum is considered necessary to ensure that the modifications proposed in the Modification Proposal of the Brightwell-cum-Sotwell Parish Neighbourhood Plan (“the Modification Proposal”) are appropriately considered for any significant social, environmental and economic effects in accordance with the Environmental Assessment of Plans & Programmes Regulations 2004. This addendum should be read alongside the Final SA/SEA Report published in February 2017, as relevant.

I.2 The Modification Proposal seeks to modify 10 existing policies and add 4 new policies of the made Brightwell-cum-Sotwell Neighbourhood Plan (“the Neighbourhood Plan”). One policy has been deleted as a scheme has been approved and built. The Modification Proposal has been approved by the Qualifying Body, Brightwell-cum-Sotwell Parish Council (“the Parish Council”) for Regulation 14 consultation under the Neighbourhood Planning Regulations 2012 (as amended).

I.3 Having considered the relevant guidance, the Parish Council decided to prepare an Addendum to the Final SA/SEA Report. The main purpose of the Addendum is to present an appraisal of the proposed modifications, rather than the Modified Plan as a whole. However, consideration is given to the cumulative effects of the modifications in terms of their overall influence across the entirety of the Neighbourhood Plan, where appropriate.

I.4 The Addendum ensures that the Modified Plan will meet the ‘basic conditions’ in respect of showing how the policies contribute to the achievement of sustainable development and of complying with the Environmental Assessment of Plans & Programmes Regulations 2004.

I.5 There have been changes to national planning policy with the National Planning Policy Framework of July 2021 and the South Oxfordshire Local Plan was adopted in December 2020. However, neither are considered to make a material difference to the scope of sustainability objectives used in 2017 and this Addendum therefore continues to apply the SA Framework established in the Final SA/SEA Report.

I.6 The proposed modifications are not considered to change the nature of the plan, as set out in the Modification Statement accompanying the Modification Proposal. The Parish Council therefore proceeded straight to the preparation of the Addendum to accompany the Modification Proposal and Statement at the Regulation 14 consultation.

I.7 The Addendum provides an assessment of the modifications to existing policies and the additional new policies and seeks to do it in a way that is proportionate to this task and that recognises the limitations of the available data and means of measuring direct impacts.

I.8 The Modification Proposal does not contain any new site allocations. The modified and new policies either sets out criteria by which development proposals should be judged or comprise a series of criteria-based landscape, green space and design proposals for development management purposes. The Revised Habitat Regulations Assessment (HRA) Screening Determination of March 2017 concluded that the Neighbourhood Plan will not have potential significant effects on Natura 2000 sites and, therefore, an Appropriate Assessment for the Neighbourhood Plan was not required in accordance with the

Conservation of Habitats & Species Regulations 2017 (as amended). There have been no changes since to the evidence base in respect of those Natura 2000 sites and the proposed modifications are not considered to change the nature of the plan, as set out in the Modification Statement accompanying the Modification Proposal. It is therefore considered that there has been no change in the scope of the Neighbourhood Plan that would lead to a different conclusion.

## **2. Background to Sustainability Appraisal Addendum**

2.1 The starting point to establish scope of the Addendum and methodology for carrying out the assessment has been established through the Final SA/SEA Report of February 2017.

2.2 The proposed modifications are not considered to change the nature of the Neighbourhood Plan as detailed in the Modification Statement. The main sustainability issues in the Parish remain, although the provisions of the Neighbourhood Plan have resulted in the affordable housing need identified now having been met. The proposed modifications are intended to ensure the continued deliverability of the Neighbourhood Plan and to improve clarity for more effective implementation.

2.3 The National Planning Policy Framework (NPPF) has since been updated; however, the Neighbourhood Plan continues to be consistent with the provisions of the latest version of the NPPF and the Modification Proposal includes modifications where appropriate. The South Oxfordshire Local Plan 2011 – 2035 has now been adopted and reflects the provisions in the Neighbourhood Plan and the Modification Proposals includes modifications where appropriate. The Modified Plan will update references to the NPPF and the Local Plan to bring the Modified Plan fully up to date in due course.

2.4 This Addendum therefore continues to apply the SA Framework established in the Final SA/SEA Report of February 2017, copied in Table A overleaf.

<b>Key Message from Policy Context</b>	<b>Sustainability Objective</b>
Increase housing supply, especially affordable housing	<ul style="list-style-type: none"> <li>To help provide existing and future residents with an opportunity to live in a decent home, by delivering at least 10 new homes within the plan period</li> </ul>
Improve the quality and design of existing and new housing	<ul style="list-style-type: none"> <li>New development to enhance the overall quality and character of the Parish and maintain a strong sense of place</li> </ul>
Improve the mix of housing size and tenure	<ul style="list-style-type: none"> <li>To help ensure suitable homes are available to all sectors of the community</li> </ul>
Preservation and enhancement of the rural landscape and sense of place	<ul style="list-style-type: none"> <li>To conserve the rural nature of the parish as a vital lung for all surrounding settlements. To protect and maintain the network of rights of way.</li> <li>To protect and maintain important views, including those out and to the main settlements.</li> </ul>
Risk of Flooding	<ul style="list-style-type: none"> <li>To ensure flood risk from all sources is managed effectively and sustainably</li> </ul>
Risk of drought and water Shortage	<ul style="list-style-type: none"> <li>To support the protection, improvement and sustainable use of water resources</li> </ul>
Threats to biodiversity and opportunities to enhance it	<ul style="list-style-type: none"> <li>To conserve and enhance biodiversity</li> </ul>
Heritage assets and the historic environment are irreplaceable resources	<ul style="list-style-type: none"> <li>To conserve and enhance the Parish's built heritage for its historic significance and important contribution to local distinctiveness, character and sense of place</li> </ul>
Increasing use of the road network within and through the Parish	<ul style="list-style-type: none"> <li>To benefit the wellbeing of the community by the management of parking and traffic congestion</li> <li>encouraging walking and cycling</li> </ul>
Enhance the setting of new housing and conservation of rural setting	<ul style="list-style-type: none"> <li>To retain existing trees and hedgerows and design new landscaping to conserve and enhance the established character</li> </ul>

Table A: Framework of Sustainability Objectives

## 7. Assessment of Modification Proposal Policies

7.1 The Modification Proposal contains 4 new policies (shown as \*) and modifies 10 existing policies which have a series of social, environmental and/or economic impacts. Using the sustainability framework in Table A above, the assessment of each new and modified policy is summarised in Table B below. The assessment is of the proposed policies with their mitigation measures. One policy has been deleted as a scheme has been approved and built.

Modification Proposal Policies		Sustainability Objectives									
		Housing Supply	Design	Housing Mix	Landscape	Flooding	Water	Biodiversity	Heritage	Roads	Rural Character
BCS1	Brightwell cum Sotwell Village Boundary	+	0	0	+	0	0	0/-	0	+	0
BCS5	House Types and Tenures*	+	+	+/0	0	0	0	0/-	0	0	0
BCS6	Building Performance*	+	+/0	+/0	0	0	0	0	0	0	0
BCS7	Design Code	0	+	0	+/0	+/0	0	+/0	+	+/0	+
BCS8	Assets of local heritage value	0	+	0	0	0	0	0	+	0	+
BCS9	Local Green Spaces	0	0	0	+	0	0	+/0	+	0	+
BCS10	Local Gaps	0	0	0	+	0	0	+/0	0	0	+
BCS11	Landscape Character	0	+/0	0	+	0	0	+/0	+/0	0	+
BCS12	Dark Skies*	0	+	0	0	0	0	0	+	0	+
BCS13	The Green Heart	0	0	0	+	0	0	+/0	0	0	+
BCS14	Local Nature Recovery	0	+	0	+	0	0	+	0	0	+



BCS15	Natural Flood Management*	0	0	0	0	+	0	+/0	0	0	+
BCS17	Solar Energy	0	0	0	0	0	0	0	0	0	0
BCS18	Community Facilities	0	0	0	0	0	0	0	0	+	0

*Table B: Comparison of Modification Proposal Policies and Sustainability Objectives*

### **Policy BCS1**

7.2 No changes have been made to the Village Boundary or the spatial strategy of the Neighbourhood Plan and so the original assessment remains valid. The modified policy clarifies how new sustainable economic development and new or extended community facilities, including sport and recreation facilities, proposals should be judged. By protecting defined Local Gaps, Key Views and local landscape character, the policy avoids a negative effect on the rural character of the village.

### **Policy BCS5**

7.3 The policy is two-fold, firstly it responds to the First Homes policy initiative introduced by the Government in 2021 by establishing criteria for Exception Schemes. Secondly, the policy responds to the prompt set out in the adopted South Oxfordshire Local Plan Policy H13 in respect of older persons accommodation.

7.4 The policy has a positive housing supply effect, allowing for up to 9 new homes to be delivered in the plan period. If such a scheme is delivered during the plan period, the minimum 30% discount on market value homes, capped at £250,000 on its first sale, ought to allow smaller and more affordable homes to contribute to rebalancing the housing mix in the Parish resulting in a positive housing mix effect. Given that there are many other, well located, larger villages and towns in the district better suited to providing specialist accommodation for older people, and the Neighbourhood Plan delivers a mix of housing to meet local needs, the policy avoids negative housing mix effects.

7.5 By directing future First Homes Exception Sites to those parts of the defined Village Boundary where development may be appropriate the policy avoids any significant negative landscape, heritage and traffic effects. Other provisions of the development plan, such as addressing biodiversity effects and delivering a net gain on sites where a loss is unavoidable, will continue to apply to First Homes Exception Site schemes. It is not considered necessary to duplicate this requirement here.

### **Policy BCS6**

7.6 The policy seeks to improve the energy and carbon performance of new and existing buildings by encouraging and incentivising the use of the Passivhaus standard of building design. The supporting text of the policy evidence that there are no viability issues. Therefore, the policy avoids negative housing supply effects. Instead, it is anticipated that the policy will help deliver high quality and energy efficient housing resulting in low energy costs which will reduce issues such as fuel poverty. This also having the potential to improve the health and wellbeing of residents through healthy air temperatures, humidity

levels, noise levels, and improved air quality resulting in a positive housing supply and design effect. Passivhaus schemes are most effective in its energy performance when delivered as terraces or apartment blocks, rather than detached or semi-detached houses that have more external wall space. The policy therefore encourages the use of those building forms which will lead to higher plot densities where it does not have a significant harmful effect on the rural character avoiding harmful design effects and ought to allow smaller homes to contribute to rebalancing the housing mix in the Parish resulting in a positive housing mix effect. In all other respects the policy is assessed as having neutral effects.

### **Policies BCS7 – BCS15**

7.7 The original assessment remains valid for these design, heritage, local gaps, landscape, green and blue infrastructure and biodiversity policies as the aim continues to reflect the intention of improving the management of development through the consideration of details that are specific to this Parish. The design code (BCS7) is much more prescriptive in this respect and contains detailed design codes in respect of assets of local heritage value (BCS8), the landscape, flooding and roads which ought to lead to more positive design outcomes in respect of these matters. The effects of new Policies BCS12 and BCS15 are generally neutral but there are some positive effects, as they seek to minimise light pollution (BCS12), capture the importance of natural flood management measures in reducing flood risk as well as wider ecosystem benefits, they may deliver (BCS15), and seek to conserve the rural character of the Parish (all).

7.8 Given the Modification Proposal does not change the very positive housing supply effect as a result of its policies, the constraining nature of these policies on new development will not have negative effects, and still allow for small infill or redevelopment schemes of the right scale and design.

### **Policies BCS17 – BCS18**

7.9 The original assessment remains valid for these modified policies.

## **8. Assessment of Reasonable Policy Alternatives**

8.1 The assessment is obliged to consider any reasonable alternatives to the proposed policies. In practice, the only alternative is that of having no policy and relying upon other development plan policies or national policy. The assessment therefore considers how such an alternative would make any difference to the sustainability outcomes.

8.2 In respect of the 'Policy Off' alternatives to all but one of the new policies, the assessment is neutral. In no case is it possible to discern any clear positive or negative effect of not having the modified or new policies. At the margins, it may be possible that a reliance on other development plan policy or the national planning policy framework may lead to decisions on planning applications that do not achieve as high a quality outcome, but this cannot be said with any more certainty than that. All the development management type policies are caveated in one way or another to indicate that support for development principles is dependent on their adherence to other development plan policies.

8.3 It is only for Policy BCS6 Building Performance where the assessment indicates a clear negative effect of not having this new policy. The supporting information establishes that existing national and local plan policies will require new development to be retrofit in the future. Policy BCS6 seeks avoid this through incentivising appropriate building standards. Where development is not delivered in this way, post-occupancy evaluation is required to ensure it measures up to the commitments made by the team that designed and built it. Failure to implement Policy BCS6 on new development will add to the existing and costly retrofit burden that will be required of the existing housing stock in the Parish; only adding to the costs across the area as a whole.

## **9. Summary of the Assessment**

9.1 The assessment indicates that the majority of the effects of the preferred modifications to the Neighbourhood Plan will be neutral, but with important positive effects in some cases. However, there remains potential for some negative effects, but such effects have been addressed through avoidance or mitigation measures.

9.2 Having tested the 'no policy' option, it does not seem likely that the alternative will lead to a better sustainability outcome than the proposed modifications. In some cases, notably in respect of design effects, the alternatives assess less well.

9.3 It can therefore be concluded that the Modification Proposal contributes to the achievement of sustainable development when considered against its reasonable policy alternatives and does not have the potential for significant negative effects.

## **10. Monitoring**

10.1 The Parish Council has been informed by the monitoring activity set out in the Final SA/SEA Report which has led to the Modification Proposal. The Parish Council will continue using that methodology to monitor the implementation of the Modified Plan.

## **APPENDIX A**

**Brightwell-cum-Sotwell Parish Neighbourhood Plan Final SA/SEA Report – February 2017**

Brightwell Cum Sotwell NP

The Clerk  
Brightwell cum Sotwell Parish Council  
The Parish Office  
The Village Hall  
Brightwell cum Sotwell  
Nr. Wallingford  
Oxon

**Brightwell cum Sotwell**  
Neighbourhood Plan

