

BENSON NEIGHBOURHOOD PLAN

2018 – 2033

FINAL SUSTAINABILITY APPRAISAL REPORT (incorporating a Strategic Environmental Assessment)

Published by Benson Parish Council to accompany the Submission version of the Benson Neighbourhood Plan under the Neighbourhood Planning (General) Regulations 2012 and in accordance with EU Directive 2001/42 and the Environmental Assessment of Plans & Programmes Regulations 2004.

October 2017

NON-TECHNICAL SUMMARY

1. The purpose of this Final Sustainability Appraisal Report is to provide an assessment of any significant social, environmental and economic effects resulting from the policies and proposals of the Submission version of the Benson Neighbourhood Plan.

2. The Parish lies to the north of Wallingford on the River Thames in South Oxfordshire and comprises the main village of Benson, the RAF Benson base and the smaller settlement of Preston Crowmarsh. The population of the Parish is approximately 4,750, with almost all households living in the main village. With recently approved housing schemes, this population will rise to more than 5,000 in the next few years.

3. The Neighbourhood Plan has been agreed by the Qualifying Body, Benson Parish Council for submission to the local planning authority, South Oxfordshire District Council to arrange its examination and referendum. The District Council issued a screening opinion on 13 June 2016 requiring an SEA and the Parish Council has chosen to meet this obligation by preparing a Sustainability Appraisal (SA).

4. A Draft SA/SEA report was consulted on alongside the Pre-Submission Neighbourhood Plan in March – April 2017, as per Stages C and D of the process. The comments made on both documents have been considered by the Parish Council in preparing the final version of the Plan and of this SA SEA report.

5. The Neighbourhood Plan contains a number of policies for the use and development of the land in the Parish of Benson in the plan period up to 2033. These policies, together with the policies of the Local Plan and the National Planning Policy Framework (NPPF) will be used by the District Council to help determine planning applications once the Neighbourhood Plan is approved in due course. Although not yet adopted, the Neighbourhood Plan has been informed by the reasoning and evidence base of the emerging Local Plan.

6. The Neighbourhood Plan vision for Benson Parish is:

“Benson will accommodate the level of growth required to meet our local housing needs, while respecting its history and protecting its rural setting beneath the Chiltern Hills and alongside the River Thames. Our Neighbourhood Plan will encourage a modern, thriving and self-confident village centre, together with the facilities and infrastructure necessary to meet the economic, social and environmental needs of the community. As part of this, the planning process will promote sensitive development that integrates well with the rest of the village and design standards that ensure Benson retains its distinctive character.”

7. The development plan for the Parish currently comprises the South Oxfordshire Core Strategy of December 2012 (covering a plan period to 2027) and a number of saved policies of the South Oxfordshire Local Plan 2011 adopted in January 2006 (covering the plan period to 2011). The emerging South Oxfordshire Local Plan 2033, which is expected to be adopted by the end of 2018, will replace the Core Strategy and older saved policies. Its Submission version of October 2017 sets no housing supply target for the Parish, given the number of new homes already consented during the plan period.

8. There appears to be no significant sustainability issues highlighted that are not also common to similar parishes in rural southern England. The local community is reluctant to accept new development if its quality cannot be made to enhance village life rather than detract from it. Although of a reasonably large population for villages in this area, Benson is limited in its village services and the local community is concerned that growing the village over the next few years will put extra pressure on roads and services.

9. The village has flooding issues, and the proximity of RAF Benson as an active airfield is also an issue. It also lies at an important road junction, where traffic heading north east from Wallingford and the busy A4074 towards the M40, passes through the village on the B4009 Watlington Road. There are many listed buildings and other local heritage assets clustered in the Benson Conservation Area, which covers the historic core of the village. There is also a Conservation Area at Preston Crowmarsh.

10. With the scale of development committed and planned at Benson, and with proposals in the wider area for significant housing development, the community is keen to secure a new bypass for the village on the B4009. There is also a desire to make a step change in green infrastructure connectivity and recreational value, and in the size and quality of local services, for existing and new residents of the larger village.

11. Given the Neighbourhood Plan must contribute to the achievement of sustainable development to meet its basic conditions, and must win the support of the local community in due course, it is not surprising that there is a reasonably strong, positive correlation between the objectives of the Plan and its sustainability objectives. There is the potential for a number of positive effects in pursuing the Plan's objectives, especially in relation to ensuring the effects of development on traffic in the village are properly considered and in protecting the landscape of the Parish and its heritage assets. The climate change and green infrastructure objectives of the plan relate closely to the need to manage effects on biodiversity and flood risks.

12. The assessment indicates that the policies of the Submission Plan have avoided leading to any significant, negative environment effects that are not offset by stronger, positive environmental and social effects. They will contribute, in overall terms, to achieving a sustainable pattern of growth and consolidation in the village.

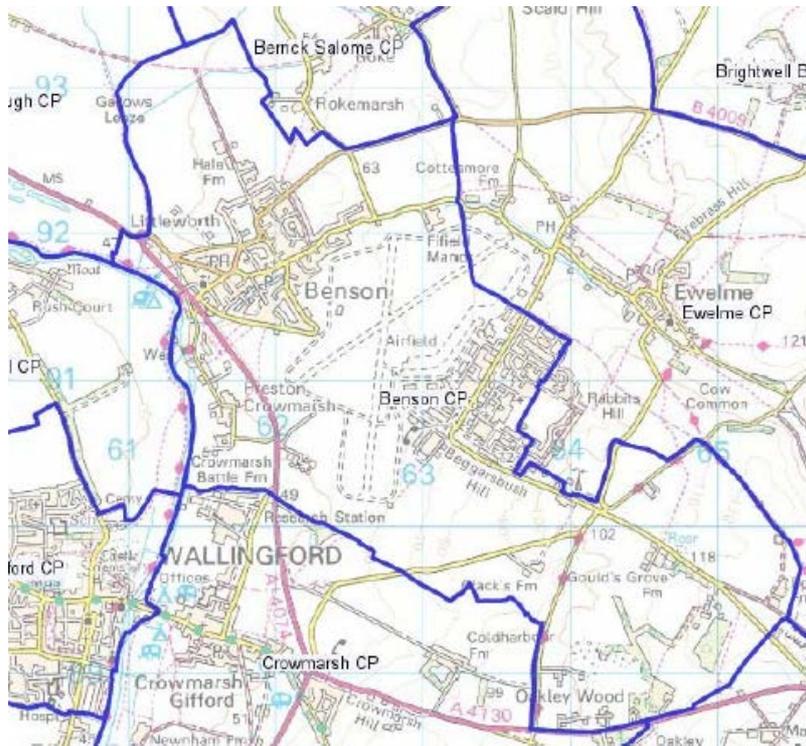
13. This is no mean feat, given the scale of development that the Plan provides for, which exceeds the scales of housing growth in the village of the last few decades. Crucially, the spatial strategy has found a way of growing the village to secure vital benefits – the Relief Road and new social infrastructure – without causing significant harm to its essential rural character. Indeed, these effects ought to sustain that character of the village, despite residual negative landscape effects, which cannot be entirely avoided. In the local community's judgement, the benefits appear to outweigh those costs.

14. The alternative strategies comprising smaller numbers of development sites do not compare unfavourably with the preferred strategy for the most part, as it is a composite of four of the eight main sites assessed. The crucial difference is that without the cumulative delivery of the Relief Road, which is dependent on each of those four sites, the other social benefits are not sufficient to outweigh their negative landscape effects.

I. INTRODUCTION

I.1 The purpose of this Final Sustainability Appraisal Report is to provide an assessment of any significant social, environmental and economic effects resulting from the policies and proposals of the Submission version of the Benson Neighbourhood Plan (“the Neighbourhood Plan”) in accordance with the Neighbourhood Planning (General) Regulations and the EU Directive 2001/42 on Strategic Environmental Assessment (SEA).

I.2 Plan A below shows the designated Neighbourhood Area, which coincides with the parish boundary. The Parish lies to the north of Wallingford on the River Thames in South Oxfordshire and comprises the main village of Benson, the RAF Benson base and the smaller settlement of Preston Crowmarsh.



Plan A: The Designated Neighbourhood Area

I.3 The Neighbourhood Plan has been agreed by the Qualifying Body, Benson Parish Council (“the Parish Council”) for submission to the local planning authority, South Oxfordshire District Council (“the District Council”), under the Neighbourhood Planning Regulations 2012. The District Council issued a screening opinion on 13 June 2016 requiring an SEA and the Parish Council has chosen to meet this obligation by preparing a Sustainability Appraisal (SA) in accordance with the Environmental Assessment of Plans & Programmes Regulations 2004 and the Planning Practice Guidance.

I.4 A Sustainability Appraisal is a systematic process used to ensure the social and economic objectives of a plan are achieved in addition to environmental considerations. For completeness, the Neighbourhood Plan has been subject to a combined process whereby the SEA has been incorporated with a Sustainability Appraisal (SA/SEA) to consider the wider social and economic effects.

1.5 This Final SA SEA report provides an assessment of the objectives and policies of the Submission version of the Neighbourhood Plan. It has sought to do so in a way that is technically robust, but that is also proportionate to this task and that recognises the limitations of the available data and means of measuring direct impacts.

1.6 A Scoping Report, (as part of Stage B of the process – see Figure B below) was consulted on for the minimum 5-week period during December 2016 – January 2017, in line with the Regulations. The comments received on the proposed scope of sustainability objectives were supportive – the objectives are set out in Section 6 of this Report. The Pre-Submission Plan was informed by the Draft SA/SEA, as per Stage C of the process. The baseline evidence is contained in the separate Scoping Report.

The Draft Sustainability Appraisal

1.7 The Draft SA/SEA report was consulted on, as per Stages D and E of the process. The comments made on both documents have been considered by the Parish Council in preparing the final version of the Plan and of this SA SEA report, for an independent examination prior to the referendum. The ongoing monitoring of the effects of implementing the plan (Stage F of the Process) is covered in Section 11 of this report.

1.8 The only comment of note specifically on the SA SEA report was from the Environment Agency, observing the absence of a consideration of the effects of housing development on the capacity of the local water and sewerage systems. This matter has been addressed with the relevant parties and changes have been made to the Plan policies accordingly. This is dealt with in Sections 7 and 8 of this report, which also reflect changes made to the final version of the policies in response to the comments received on the Pre-Submission Plan. They include comments made by Natural England on the landscape effects of the development proposals on the setting of the North Wessex Downs and Chilterns AONB.

Habitat Regulations Assessment

1.9 In its Screening Opinion on the SEA, the District Council included (in its Appendix 2) an opinion on the need for an Appropriate Assessment under the Habitat Regulations Assessment (HRA), as per Article 6(3) of the EU Habitats Directive. It noted that there is one Special Area of Conservation (SAC) within 5km of the Parish (at Little Wittenham) but concluded that the provisions of the Neighbourhood Plan would not have any significant effects on that Natura 2000 site and an Appropriate Assessment would not be required.

1.10 However, the District Council published its HRA Screening Opinion for the Neighbourhood Plan in August 2017. It concluded that, “likely significant effects on the integrity of European sites around South Oxfordshire from policies and site allocations in the Local Plan will not occur in relation to physical loss of or damage to habitat; non-physical disturbance: noise, vibration and light pollution; or water quantity and quality.” It also considered that, “none of the policies or site allocations ...is ... likely to result in significant effects on the European sites within 17km of Benson, due to air pollution or recreation pressure.” But, it considered that the four main housing allocation policies have, “uncertain likely significant effects on Little Wittenham SAC, due to increased visitor numbers, and uncertain likely significant effects on Aston Rowant SAC and Chilterns Beechwoods SAC, due to increased traffic and air pollution.”

1.11 Taking these in turn, it stated that, “taking into account mitigation provided by several policies within the Neighbourhood Plan that require developments to provide open space, it is considered that Appropriate Assessment of recreation effects at Little Wittenham SAC is not required.” In addition, it stated that, “very few journeys are made to Benson from the direction of Aston Rowant SAC or Chilterns Beechwoods SAC. An Appropriate Assessment of air pollution effects from the Benson Neighbourhood Plan alone does not therefore need to be carried out.” But, it concluded that, “there is uncertainty around the need for Appropriate Assessment of the effects of air pollution on Aston Rowant SAC or Chilterns Beechwoods SAC from in-combination effects with other plans or projects, including the emerging new South Oxfordshire Local Plan.”

1.12 The HRA of the emerging new Local Plan has now fully assessed the wider in-combination effects of development on air pollution, including the proposals of this Neighbourhood Plan, which have now provided for additional green infrastructure. It has concluded that the mitigation and other policy provisions of the respective plans have enabled those effects to be screened out and no further action is required of the Neighbourhood Plan. Copies of the August 2017 screening opinion and of the Local Plan HRA are published separately in the submission documentation of the Neighbourhood Plan.

2. Background to Sustainability Appraisal

2.1 Through the SA/SEA the social, environmental and economic effects of the Neighbourhood Plan are tested to ensure that these promote Sustainable Development and the Plan avoids causing any significant environmental effects.

2.2 The combined process involves a simple evaluation of the social, economic and environmental impacts of the plan as follows:

- An outline of the contents, main objectives of the plan, and relationship with other relevant plans or programmes
- The relevant aspects of the current state of the environmental and the likely evaluation thereof without implementation of the plan
- The social, economic and 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
- The environmental protection objectives, established at international, community or national levels, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparations
- The likely significant effects on the local economy, society and the environment
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the plan
- 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
- A description of measures envisaged concerning monitoring

2.3 The methodology for the assessment is intended to be proportionate to the task of assessing the modest development proposals of a Neighbourhood Plan in a relatively small rural area. A summary of the process, as derived from the 2004 guidance is contained in Table I below:

Screening	STAGE A: This stage determines whether the Plan has the potential for having significant
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	environmental effects.
Scoping	<p>STAGE B: This stage sets the context of the assessment by identifying the baseline data and establishing the scope of the assessment.</p> <ol style="list-style-type: none"> 1. Identification of relevant plans, policies and programmes. Any existing requirements that need to be taken into account or incorporated into the plan are identified. 2. Review of baseline information. Data about environmental, social and economic issues is collected, together with an indication as to how this may change in the future without the plan or programme under preparation. 3. Identification of Sustainability Issues. The review of plans and policies, together with the baseline information are used to identify the key sustainability issues which could impact the plan. 4. Development of the SA/SEA Framework. The assessment criteria used to assess the impact of the plan or programme. 5. Identification of initial plan options. Taking into account best practice initial identification of options and reasonable alternatives undertaken. 6. Consultation. On the scope and alternatives for assessment it is necessary to consult statutory consultees, that is Natural England, Historic England and the Environment Agency.
Assessment	<p>STAGE C: This stage involves the assessment of the any likely significant effects of the plan policies (and any reasonable alternatives) on the key sustainability issues identified.</p> <ol style="list-style-type: none"> 1. Finalisation of the Plan options and alternatives for testing 2. Testing the Plan Objectives against the SA/SEA Framework. The Plan Objectives are tested to ensure compliance sustainability principles 3. Evaluation of plan options and alternatives. The SA/SEA Framework is used to assess various plan options by identifying the potential sustainability effects of the plan and assist in the refinement of the policies. 4. Predicting and evaluating the effects of the plan. To predict the significant effects of the plan and assist in the refinement of the policies. 5. Consideration of ways to mitigate adverse effects and maximise beneficial effects. To ensure that all potential mitigation measures and measures for maximising beneficial effects that are identified. 6. Proposing measures to monitor the significant effects of implementing the Plan: To detail the means by which the sustainability performance of the plan can be assessed and monitored. <p>This is assessment is used to feed into the development of a plan or programme to help ensure the most sustainable option is selected. The SA/SEA framework is also used to access the sustainability implications of the draft policies and the results used to inform policy development.</p>
Reporting and Consulting	<p>STAGE D: Preparation of the SA/SEA Report</p> <ul style="list-style-type: none"> • The findings of the assessment together with how it has influenced the development of the plan are identified and set out in a draft environmental report together with the recommendations on how to prevent, reduce, or offset any significant negative impacts arising from the plan. <p>STAGE E: Consultation – seek representations from consultation bodies and the general public</p> <ul style="list-style-type: none"> • This is an ongoing process. Consultation of the draft SA/SEA Report is undertaken into account and used to influence further iterations of the sustainability appraisal process.
Adoption and Monitoring	<p>STAGE F: Monitoring</p> <p>Following adoption of the Plan, the significant effects of implementing the plan are measured and any adverse effects are responded to. The results are fed into the future plans and sustainability appraisals.</p>

Table A: The Combined SA SEA Process

2.4 Since the Scoping Stage was completed, the focus has been on spatial strategy choice and policy formation. As discussed in Sections 8 and 9, the spatial strategy preferred by the local community for growing the main village has been tested against some alternative spatial strategies using the SA/SEA framework. In all other policies, the framework has been used to compare them with a 'Policy Off' alternative.

3 Neighbourhood Plan Objectives & Other Programmes

3.1 The Neighbourhood Plan contains a number of policies for the use and development of the land in the Parish of Benson in the plan period up to 2033. These policies, together with the policies of the Local Plan and the National Planning Policy Framework (NPPF) will be used by the District Council to help determine planning applications once the Neighbourhood Plan is approved in due course. Although not yet adopted, the Neighbourhood Plan has been informed by the reasoning and evidence base of the emerging Local Plan.

3.2 The Vision for Benson Parish is:

“Benson will accommodate the level of growth required to meet our local housing needs, while respecting its history and protecting its rural setting beneath the Chiltern Hills and alongside the River Thames. Our Neighbourhood Plan will encourage a modern, thriving and self-confident village centre, together with the facilities and infrastructure necessary to meet the economic, social and environmental needs of the community. As part of this, the planning process will promote sensitive development that integrates well with the rest of the village and design standards that ensure Benson retains its distinctive character.”

3.3 To achieve this vision a number of key objectives have been identified as follows:

1. To provide sufficient housing to meet local needs;
2. To cater for growth in a manner that maintains the distinct and separate character of the village;
3. To cater for growth in a manner which respects Benson’s setting in the rural landscape and its close association with the River Thames;
4. To ensure that Benson has a modern, vibrant village centre;
5. To ensure there are adequate facilities to serve our growing local population;
6. To ensure the sustainability of economic activity in the Neighbourhood Plan area;
7. To safeguard and enhance existing green infrastructure and secure the provision of additional green space connected to the wider countryside;
8. To ensure that new development is sited, planned and executed in a way that takes account of climate change and other changes in the natural environment;
9. To ensure that new development contributes towards the free and safe flow of traffic and does not worsen road conditions in the village;
10. To ensure that new development contributes towards the free and safe flow of traffic and has a minimum impact on the existing highway infrastructure

11. To encourage walking and cycling to get around the village by providing a network of safe pedestrian and cyclist routes, in particular to the centre.
12. To encourage sustainable modes of transport by all means available.

3.4 The National Planning Policy Framework (NPPF) published by the government in 2012 is an important guide in the preparation of local plans and neighbourhood plans. The Neighbourhood Plan must demonstrate that it is consistent with the provisions of the NPPF. The following paragraphs of the NPPF are especially relevant to the Plan:

- Supporting a prosperous rural economy (paragraph 28)
- Promoting sustainable transport (paragraph 29)
- Delivering a wide choice of quality homes (paragraph 50)
- Requiring good design (paragraph 58)
- Protecting healthy communities (paragraph 70)
- Protecting local green spaces (paragraph 76)
- Conserving and enhancing the natural environment (paragraph 109)
- Conserving and enhancing the historic environment (paragraph 126)
- Neighbourhood planning (paragraph 185)

3.5 The development plan for the Parish currently comprises the South Oxfordshire Core Strategy of December 2012 (covering a plan period to 2027) and a number of saved policies of the South Oxfordshire Local Plan 2011 adopted in January 2006 (covering the plan period to 2011). The emerging South Oxfordshire Local Plan 2033, which is expected to be adopted by the end of 2018, will replace the Core Strategy and older saved policies. The Neighbourhood Plan will also replace some non-strategic Local Plan policies as they relate specifically to this Parish. The development plan also includes minerals and waste plan documents adopted by Oxfordshire County Council.

3.6 Although the Plan will be tested for its general conformity with the strategic policies of the adopted Core Strategy and Local Plan, the imminence of the new Local Plan means the Parish Council has been wise to consider the emerging policy direction and its reasoning and evidence. The Submission version of the Local Plan 2033' has been published (October 2017). Its Policy H4 'Larger Villages' requires a minimum of 1,041 new homes to be delivered across the 12 larger villages in the District over the plan period. It identifies Benson as a larger village, but notes that the village has already met the 15% increase in dwellings requirement of larger villages with schemes consented since April 2011. Its Policy TRANS3 also identifies a 'bypass for Benson' as one of a number of proposals to safeguard land for strategic transport schemes.

3.7 The Local Plan is accompanied by an updated Sustainability Appraisal (SA). As Policy H4 has devolved decision making on how to meet its housing supply requirement primarily to Neighbourhood Plans, the SA concludes only that the total quantum of homes will have significant positive effects but a series of unknown effects in terms of their distribution. It assumes that the SA of each Neighbourhood Plan will address these matters. In respect of Policy TRANS3, the SA identifies no clear harmful effects, and is not specific about any scheme, but it notes a number of uncertain effects.

3.8 The essence of the overall planning strategy for the District has been and will continue to be to focus development on the main towns and larger villages of the District and to maintain the rural character of the open countryside that makes up the majority of the area. The rural economic development strategy favours rural diversification, tourism development and home working, provided proposals respect the quality of their countryside location. There is no specific policy proposal in the new Local Plan to this effect but it is not expected the strategy will change, thus encouraging the Plan policies to promote appropriate proposals to support local jobs in the Parish.

3.9 The affordable housing policy framework is well-established and is not likely to change in respect of the proportion of overall numbers required per scheme. However, national changes to affordable housing policy – most specifically the inclusion of Starter Homes in its definition – are likely to alter the economics and therefore mix of tenure type that can be planned for through the local planning system.

3.10 The adopted and emerging strategic policies seek to prevent the unnecessary loss of valued community facilities. This provides an opportunity for the Neighbourhood Plan to identify those community facilities in the Parish that warrant protection from these policies. There is a comprehensive framework of landscape protection policies that are relevant to the Parish, given the proximity of the AONB and River Thames to the Parish. The framework allows for appropriate development but reinforces the importance of ensuring all development proposals respect the special landscape character. The policies will help inform site selection and other policies of the Plan.

3.11 Although these policies now repeat national policy guidance, they reinforce the importance of proposals having full regard to heritage assets, whether formally designated or not. The Parish contains a significant number of listed buildings, as well as a Conservation Area centred on the village. Along with the local landscape character, these heritage assets have helped shaped the site selection and other policies of the Plan. It also defines the special character of the local Conservation Area and raises the status of current supplementary guidance to carry the full weight of the development plan.

3.12 The policy framework contains a range of generic design and development management policies to be applied to all types of development proposal across the District. Again, there is the opportunity for the Neighbourhood Plan to refine the framework so the guidance is specific to the Parish and carries greater weight in decision making.

3.13 The framework contains a variety of policies promoting the multi-functional benefits of green infrastructure assets. Such assets are especially important in defining the character and in the functioning of the village and wider Parish. In which case, the Plan provides an opportunity to bring forward specific proposals to protect and improve existing assets and to create new assets through development proposals.

4.3 The village has flooding issues, and the proximity of RAF Benson as an active airfield is also an issue. It also lies at an important road junction, where traffic heading north east from Wallingford and the busy A4074 towards the M40, passes through the village on the B4009 Watlington Road. There are many listed buildings and other local heritage assets clustered in the Benson Conservation Area, which covers the historic core of the village on the B4009. As a result, heavy traffic detracts from the enjoyment of the centre. For the most part, the setting of the Conservation Area comprises modern developments – its one remaining edge to the village on Littleworth Road will also be lost to development with the delivery of the scheme on site BENI in due course. There is also a Conservation Area at Preston Crowmarsh.

4.4 There will be a limit to the extent to which the village can grow without seriously compromising its day to day functioning and causing greater harm to its special heritage assets. The legacy of its road system and patterns of past growth will hinder any significant further growth beyond the BENI site without significant improvements in that system.

4.5 But, the Parish Council is mindful of the continued uncertainty of precisely how and where housing growth will be planned for and delivered in the District, and of the immediate and intense development pressure facing the village. It therefore proposes to make some further provision for housing development, but to do so in such a way that addresses longer term concerns on traffic and social infrastructure.

4.6 The opportunity to consider and plan for these concerns was missed on the BENI scheme, though it is intended that the detailed reserved matters applications for Phase II of the scheme can address them. There is an opportunity to plan for a Relief Road for the village to its north as part of the strategic transport infrastructure needs to support the Local Plan proposals in the surrounding area. There is also a desire to make a step change in green infrastructure connectivity and recreational value, and in the size and quality of local services, for existing and new residents of the larger village.

4.7 Without the Neighbourhood Plan, proposals for development in the Parish would be left to individual planning applications and opportunities to manage change positively and cumulatively may be lost. This would make little difference to controlling the environmental impacts of those proposals as they must in any event demonstrate they conform to development plan and the National Planning Policy Framework (NPPF) policy.

5 Sustainability Characteristics

5.1 Benson is located in the County of Oxfordshire, and is 1 mile north of Wallingford. The population of the Parish is approximately 4,750, with almost all households living in the main village. With recently approved housing schemes, this population will rise to more than 5,000 in the next few years.

5.2 The Interim Sustainability Appraisal undertaken by the District Council in 2015 to evaluate the land available for development at Benson, highlighted four key environmental characteristics that will shape change in the village:

- the Conservation Area, listed buildings, other buildings of local interest and known archaeology interest – there are especially important clusters of historic buildings along Church Road, High Street and Brook Street
- land at risk of flooding from the Thames and from surface water run off – this mostly affects land to the immediate west of the village from the A4074 to the Rover Thames, but extends eastwards through the historic core of the village towards the airfield at its eastern end
- the operations of RAF Benson airfield – the busy base it expected to be operational for the plan period and its runways lie in close proximity to the southern edge of the village
- the increase of vehicular traffic on the A4074 Oxford to Reading road and B4009 Watlington Road – although there are good bus services on the A4074 it is an increasingly busy route for commuters to and from nearby Wallingford, and the B4009 through the village is becoming busier as a route to the M40 to the north (which may become much busier if the new settlement proposed at Chalgrove is approved)

5.3 It also noted some known biodiversity interest in specific locations (though no designations within or very close to the Parish) and generally a uniform landscape character of modest sensitivity to new development. In addition, all the agricultural land surrounding the village is Grade 2. However, the Parish lies within the wider setting of the North Wessex Downs AONB to its south-west and of the Chilterns AONB further to its south east. The 'Landscape Capacity Assessment for Sites on the Edge of the Larger Villages Study' of 2014 for the Local Plan notes that the development of some edges of the village may affect those settings, but those effects may be mitigated through detailed design measures.

5.4 There is no secondary school in the village but it does have a popular primary school and a small (and now inadequate) youth club building on Oxford Road on its western edge. There is a modest number of local shops and services located in High Street. The Parish Hall on Sunnyside provides a range of community facilities and there is a large recreation ground, sports facilities and children's play area alongside it. There is another play area at Green Close and two allotment areas off St. Helen's Avenue and Mill Lane, for which there is a greater demand. The burial ground off Church Road is full.

5.5 A significant increase in the number of households on the edge of the village may lead to an increase in the use of local shops and services, although there is little scope to increase their size or number on High Street. The primary school is considered large enough to be able to meet the demand for new places – perhaps in combination with changes to its

catchment area – but some other facilities cannot easily meet new demands, notably the youth centre, allotments and burial ground.

5.6 In recent years the foul sewerage system in the Benson catchment has become overwhelmed in some locations for weeks and even months, following prolonged heavy rainfall and high ground water levels. This has resulted in some properties suffering from sewer flooding and restricted toilet use. The Water Cycle Study of November 2016 prepared for the Local Plan notes that although Thames Water considered its Water Resource Management Plan would meet the projected water supply needs of Benson, the capacity of the waste water treatment system would not. It indicates that the system will be able to accommodate housing growth in the early part of the plan period, but a major upgrade will be required before 2030.

5.7 In addition, the Thames Water Drainage Strategy also outlines a series of measures already completed and ongoing which will improve future operational response, improve understanding of how the Benson system operates and address sources of surface and groundwater inflow to the system. The current preferred strategy for Benson is to install "low-leak" covers in areas prone to fluvial or surface water inundation, and continuous in-sewer depth monitoring to capture a major wet-weather event. Thames Water is tracking planning enquiries and applications for major commercial or housing development equivalent to 258 properties, plus additional sites where numbers are unconfirmed or fewer than 10 properties.

Cumulative Effects

5.8 In the immediate locality, the Parish is bordered by the Parishes of Brightwell-cum-Sotwell, Crowmarsh, Ewelme, Berrick Salome, Warborough and Nuffield, and lies just to the north east of the town of Wallingford. Of these, Brightwell-cum-Sotwell Parish now has a made Neighbourhood Plan. As a smaller village than Benson, the scale of development planned for is considerably smaller (approximately 60 homes) and is focused entirely on the main village, rather than close to Benson Parish. It will therefore be immaterial to the making of the Plan and to the SA of the plan. A neighbourhood area has also been designated covering Warborough but the scope of that Plan is currently unknown. It is expected that the Wallingford, Crowmarsh Gifford and Watlington Neighbourhood Plans will be making provision for the scale of development proposed in the emerging Local Plan of 300, 260 and 110 new homes respectively.

5.9 In the wider area, the Local Plan proposes 6,500 homes at Didcot, 3,500 homes at Culham, 3,000 homes at Chalgrove Airfield and 1,700 homes at Berinsfield, all with new employment land and supporting services and facilities. The SA of the Local Plan has screened out any significant harmful sustainability effects of this scale of development on the basis of the proposed mitigation measures.

6 Sustainability Objectives

6.1 To assess the sustainability performance of the Neighbourhood Plan, an assessment framework has been adopted, as shown in Table C below. The proposed framework was consulted upon with the statutory consultees as part of the SA/SEA Scoping Report. Some changes have been made as a result of comments made, and a correction has been made to a production error in relation to Objective 5: Village Centre in that report.

Sustainability Objectives of the Benson Neighbourhood Plan
<p><u>Objective 1: Heritage</u></p> <p>To sustain and enhance the heritage assets of the Parish.</p> <ul style="list-style-type: none">• Will the policies ensure that there will be no harm to a designated heritage asset or that its setting is enhanced?• Will the policies promote opportunities to enhance the setting of a designated heritage asset?
<p><u>Objective 2: Landscape</u></p> <p>To successfully manage change to the character of the local landscape.</p> <ul style="list-style-type: none">• Will the policies avoid development on the most sensitive landscape edges and protect the setting of the North Wessex Downs AONB?• Will the policies help prevent the visual coalescence of Benson with its neighbouring settlements?
<p><u>Objective 3: Traffic</u></p> <p>To minimise the effects of extra traffic on local roads resulting from new developments.</p> <ul style="list-style-type: none">• Will the policies make provision for long term road improvements to alleviate congestion in the village?• Will the policies ensure that unavoidable car trips can be managed on the local road network?
<p><u>Objective 4: Biodiversity</u></p> <p>To deliver a net gain in the biodiversity value of the Parish.</p> <ul style="list-style-type: none">• Will the policies ensure that development will lead to an overall improvement in the biodiversity value of the Parish?• Will the policies protect designated biodiversity sites from harmful development?• Will the policies help enable the proper maintenance and enhancement of any ecological networks?
<p><u>Objective 5: Village Centre</u></p> <p>To improve the vitality and viability of the village centre.</p> <ul style="list-style-type: none">• Will the policies protect the critical mass of the local services in the Village Centre?• Will the policies lead to a greater footfall of local people accessing the Village Centre?

<p><u>Objective 6: Community Assets</u></p> <p>To sustain a range of viable community assets.</p> <ul style="list-style-type: none"> • Will the policies protect existing community assets from unnecessary loss? • Will the policies enable investment in new community assets in accessible locations in the village?
<p><u>Objective 7: Flooding</u></p> <p>To avoid or minimise the risk of flooding.</p> <ul style="list-style-type: none"> • Will the policies avoid the development of land at risk of flooding (in flood zones 2 and 3)? • Will the policies ensure that any development in areas known to be at risk of surface water flooding makes satisfactorily provision for mitigation measures?
<p><u>Objective 8: RAF Benson</u></p> <p>To ensure the amenities of local residents are not harmed by the operations of RAF Benson.</p> <ul style="list-style-type: none"> • Will the policies ensure that new development is not exposed to any significant harm in respect of noise, vibrations or safety from aircraft activities?

Table C: Framework of Sustainability Objectives

6.2 The selection of objectives for the proposed framework reflects the general sustainability issues of the parish and the likely scope of policies in the Plan, as outlined above. It has selected those objectives are considered the most relevant and informative for this purpose. The decision not to choose any particular policy objective does not necessarily mean that this objective has no relevance to the Plan, but that is unlikely to enable the merits of policy options to be measured and is therefore unhelpful for this purpose.

6.3 The land around the edge of the village is uniformly Grade 2 in the Agricultural Land Classification and so is not a distinguishing feature of the appraisal. Similarly, all of the land lies within the wider setting of the North Wessex Downs AONB, although the overall effects of the Plan are considered in relation to the observations of the Landscape Assessment of Larger Villages report for the Local Plan.

6.4 On the same basis, the ability of the Plan and its policies to deliver additional housing to that already consented is not considered to be a matter worth assessing on a site by site basis. All the village edge sites are of a sufficient size to deliver enough new homes to provide a healthy contribution to supply over and above the levels indicated in the emerging Local Plan.

7. Assessment of Neighbourhood Plan Objectives

7.1 A summary of the assessment of the 12 Neighbourhood Plan objectives against the 8 SA/SEA objectives is provided in Table D below. A simple 'scoring' system is used to show positive (+), neutral (0) or negative (-) effects, or marginal effects (e.g. +/- or 0/-). Where the effect is dependent on an assumption, then a mix of those scores is used and an explanation is provided in the text below.

Neighbourhood Plan Objectives		Sustainability Objectives							
		1. Heritage	2. Landscape	3. Traffic	4. Biodiversity	5. Village Centre	6. Community Assets	7. Flooding	8. RAF Benson
1	Housing	0/-	0/-	0/-	0/-	+/0	+/0	0/-	0/-
2	Village Character	+	0	0	0	+	+	0	0
3	Rural Landscape	+	+	0	+	0	0	0	0
4	Village Centre	0	0	0/-	0	+	+/0	0	0
5	Facilities	0	0	0/-	0	+/0	+	0	0
6	Economic Activity	0	0	0/-	0/-	+/0	0	0/-	0/-
7	Green Infrastructure	0	0	0	+	0	+	+	0
8	Climate Change	0	0	+	+	0	0	+	0
9	Traffic	0	0	+	0	+/-	+/-	0	0
10	Highways	0	0	+	0/-	0	0	0	0

11	Walking & Cycling	0	0	+	0	+	+	0	0
12	Public Transport	0	0	+	0	0	0	0	0

Table D: Comparison of Neighbourhood Plan and Sustainability Objectives

7.2 Given the Neighbourhood Plan must contribute to the achievement of sustainable development to meet its basic conditions, and must win the support of the local community in due course, it is not surprising that there is a reasonably strong, positive correlation between the two sets of objectives.

7.3 There is the potential for a number of positive effects in pursuing the Plan’s objectives, especially in relation to ensuring the effects of development on traffic in the village are properly considered and in protecting the landscape of the Parish and its heritage assets. The climate change and green infrastructure objectives of the plan relate closely to the need to manage effects on biodiversity and flood risks.

7.4 However, positive effects are not a given, as there is the potential for some Plan objectives to have neutral or negative effects, if the policy choices and details are not addressed carefully. For example, the Plan objective of delivering homes to meet local needs has the potential for a range of negative effects, if homes are planned in the wrong locations in the Parish or cannot be served by improvements to the local highways and utilities infrastructure in a timely fashion. Similarly, the Plan objective of promoting economic development has the potential to have negative biodiversity, heritage and traffic effects if in the wrong location or if development is not properly planned for. In both cases too, their effects on the operations of nearby RAF Benson may be negative if development is located in places that may hinder those operations, or that may harm the amenities of residents or employees.

7.5 Conversely, the supply of new homes may help sustain the character of listed buildings and, if of the right type, may enable a change in the demographic profile of the main village to help sustain its village centre and community facilities, e.g. the primary school.

8. Assessment of Neighbourhood Plan Policies

8.1 The Neighbourhood Plan contains 34 policies, which have a series of social, environmental and/or economic impacts. Using the sustainability framework in Table D above, the assessment of each policy is summarised in Table E below. The assessment is of the proposed policies with their mitigation measures.

Neighbourhood Plan Policies		Sustainability Objectives							
		1. Heritage	2. Landscape	3. Traffic	4. Biodiversity	5. Village Centre	6. Community Assets	7. Flooding	8. RAF Benson
1	Housing Allocations	0	0/-	+	+/0	+	+	0	0
2	Land North of Littleworth Road	0/-	0/-	+	0	0	+	0	0
3	Land at Hale Road	0	0/-	+	0	0	+	0	0
4	Land North of The Sands	0	-	+	0	0	+	0	0
5	Land South of St. Helen's Avenue	0	0	+	0	0	+	0	0
6	Conservation & Heritage	+	+	0	0	+	0	0	0
7	Design	+	0	0	0	0	0	0	0
8	Traffic Flow	+	0	+	0	+	0	0	0
9	Parking	0	0	+	0	+	+	0	0
10	Access to Public Transport	0	0	+	0	0	0	0	+
11	Pedestrians & Cyclists	0	0	+	0	+	+	0	+

12	Sustainable Travel	0	0	+	0	0	0	0	+
13	Community Facilities	0	0	+	0	+	+	0	0
14	Benson Library	0	0	+	0	0	+	0	0
15	Shops	+/0	0	+	0	+	+	0	0
16	Village Centre	+/0	0	+	0	+	+	0	0
17	Assets of Community Value	+/0	0	+	0	0	+	0	0
18	Doctor's Surgery	0	0	+	0	0	+	0	0
19	Internet Provision	0	0	0	0	0	+	0	0
20	Broadband	0/-	0/-	0	0	0	+	0	0
21	Allotments	0	0	0	+	0	+	0	0
22	Play Facilities	0	0	+	0	0	+	0	0
23	Littleworth Road Facilities	0	0	+	0	0	+	0	0
24	Protection of Local Green Space	0	0	0	+	0	+	0	0
25	Creating New Local Green Space	0	0	0	+	0	+	0	0
26	Biodiversity Net Gain	0	0	0	+	0	0	0	0
27	Wildlife Corridors	0	0	0	+	0	0	0	0
28	Green Infrastructure Management Plans	0	0	0	+	0	+	+	0

29	Benson Brook	0	0	0	+	0	0	+	0
30	Distinctiveness of Settlements	0	+	0	+	0	0	0	0
31	Important Views	0	+	0	0	0	0	0	0
32	Scope for Development	+	+	0	+	0	0	0	0
33	Sustainable Drainage Systems	0	0	0	0	0	0	+	0
34	Flood Risk	0	0	0	0	+	0	+	0

Table E: Comparison of Neighbourhood Plan Policies and Sustainability Objectives

Policy NP1

8.2 This policy establishes the principle housing site allocations, the details of which are contained in policies NP2 – NP4. It also seeks to contain new development to that which is plan-led and so establishes the principle of new development being focused within the built-up area of the main village. It is the outcome of decisions made on the proposed spatial plan and subsequent housing site allocations for growing the main village with housing development and its necessary supporting social and transport infrastructure.

8.3 The spatial plan and housing site allocations are focused on the delivery of a new Relief Road around the northern edge of the village to manage future traffic growth from committed and planned housing schemes within and beyond the Parish. As explained in the Neighbourhood Plan’s Transport Study in the evidence base, and restated in the Transport Impact Study for the Local Plan, that growth is forecast to be significant in the coming years. The three housing site allocations will each deliver a component of the Relief Road, and have been selected for that purpose.

8.4 Aside from its contribution to meeting local housing supply, which exceeds the level anticipated in the Local Plan, the proposed spatial plan will have positive traffic and community facility effects. Its positive traffic effect results from its provision for the site allocations of NP2 – NP4 which together will deliver a new Relief Road north of the village. This will also have a positive heritage effect in removing much of the traffic congestion in the historic village centre. With the planned growth at Didcot, Berinsfield, Culham, Wallingford and Chalgrove in the Local Plan, it is forecast that the level of traffic using the B4009 will significantly increase over the plan period. The Parish Council considers that a northern bypass appears to be the only effective means of managing its effects on the heritage assets and quality of life in Benson (given the presence of RAF Benson, which prevents a southern route).

8.5 The effect on the village centre economy is not known. There may be some loss of passing trade on the one hand, but more trade from within a larger village, much of which will walk or cycle rather than drive to its facilities. The larger population may also create sufficient local demand to encourage investment in the centre to increase the number and range of local shops and services over time.

8.6 Some degree of negative landscape effect is inevitable with the loss of greenfield land around the north and east of the village, as highlighted in the 'Landscape Capacity Assessment for Sites on the Edge of the Larger Villages Study'. Although the land has no designated status or special sensitivity to development, it does help define the rural character of the village in the landscape (including the setting of the North Wessex AONB to the west) and there is a risk of some visual coalescence of Benson with Rokemarsh. It is noted that the individual site allocation policies all make provision for effective landscape buffers to mitigate the impact of development on the landscape, as recommended by the Study, but these measures will not remove all the harmful effects.

Policies NP2 – NP4

8.7 The three housing site allocation policies will deliver together the proposed spatial plan. All the sites will therefore have positive housing supply and traffic effects and will avoid any significant negative heritage, flooding, water and rural character effects. They are distinctive sites so will offer a range of opportunities to deliver a mix of housing to meet local needs.

8.8 However, none of the sites is entirely unencumbered and so each contains a series of key development principles to ensure their proper planning. In respect of their landscape effects, as noted in NPI above, there is no mitigation measure that could entirely avoid harmful effects, given the greenfield location of the sites in the surrounding countryside to the village. The sites do adjoin the village edge and the use of strategic landscape buffers and the retention of key views through the sites will go some way to reducing those effects. The introduction of new green infrastructure will also enable a net gain in biodiversity, as the low value of the agricultural land will be replaced with significant landscape buffers.

Policy NP5

8.9 This policy encourages the provision of a new burial ground to supplement the existing facility nearby, that will reach its capacity before the end of the plan period. The site is well located for this purpose, lying close to the church and with a number of public rights of way connecting it to the village. The housing potential of the site cannot be realised, given its location within operational flying area of RAF Benson.

8.10 The policy will have positive traffic and community asset benefits, as it will enable the village to continue to meet its own burial needs into the long term. Car trips and journey lengths will be fewer and shorter as a result, when compared to the alternative of the community having to travel by car to other burial facilities beyond the Parish.

Policies NP6, NP7, NP30 & NP31

8.11 These design-related policies will have positive heritage and landscape effects as they seek to manage the impacts of development change within the village and its surrounding countryside. The heritage effects are especially important as the Benson Conservation Area and its many historic buildings are an essential feature of the character of the village. With other policies providing for considerable growth, these design policies will take on an increasing importance in successfully mitigating its effects on that character.

8.12 In addition, the policies may have a positive village centre effect – as it lies entirely within the Conservation Area – as its historic character attracts more local and visitor trade. The views and landscape buffer policies will have positive landscape effects as they seek to help mitigate the full impact of development on the surrounding countryside. The buffers may also create opportunities to deliver positive biodiversity effects on land that has generally been intensively farmed.

Policies NP8 – NP12

8.13 This is a group of access and movement policies aimed at managing the effects of traffic and parking in the village, primarily through the promotion of alternative means to travelling than the private car and at the same time ensuring that necessary provision is made for parking, pavements and other facilities to encourage walking and cycling. The policies very much complement the allocation policies NP2 – NP4 in their combined provision of the new Relief Road to remove through traffic using the B4009.

8.14 Together, the policies have the potential to realise positive heritage effects by better managing traffic and parking, which currently combine to detract from the character of the Conservation and its clusters of listed buildings.

Policies NP13 – NP23

8.15 This series of policies aimed at protecting and improving a range of social infrastructure types in the village will all have positive traffic and community facility effects. A growing population will require these improvements to avoid having to travel outside the village to access services and to ensure the size and quality of each facility meets the needs of the local community. Some will also have positive village centre effects in seeking to protect against the unnecessary loss of local shops. And where shops or other facilities occupy historic buildings, some policies may have positive heritage benefit in securing the long term economic future of those buildings. This may also have a positive effect in maintaining the character of the Benson Conservation Area, which coincides with much of the village centre on High Street.

Policies NP24 – NP29, NP32 – NP34

8.16 This range of environmental policies ought to have some positive biodiversity, landscape, heritage, community facility and flood risk benefits, as they seek to manage the impacts of change on the local environment and rural character of the village. As they complement the site allocation policies, they should not be regarded as constraining of housing or economic growth, and so should avoid negative effects on maintaining the viability or the village centre or community facilities.

9. Assessment of Reasonable Policy Alternatives

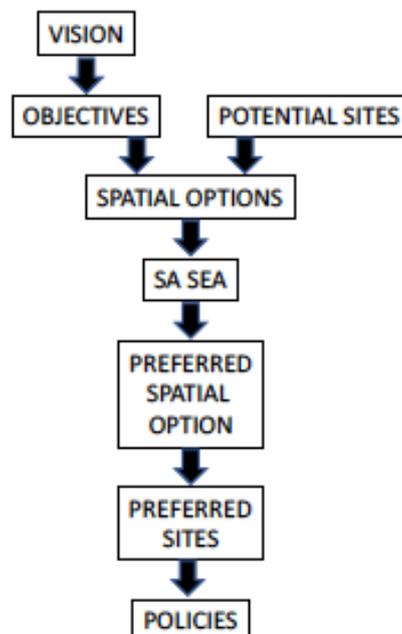
9.1 The assessment is obliged to consider any reasonable alternatives to the proposed policies. In practice, the only alternative to most of the policies is that of having no policy and relying upon other development plan policies or national policy. The assessment therefore considers how such an alternative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

Policies NPI – NP4

9.2 Firstly, however, it assesses the alternatives to the proposed spatial plan that defines Policy NPI. The built-up area of the village will include the three housing site allocations (in policies NP2 – NP4), but other combinations of potential housing sites have been assessed. And, given, the Local Plan does not propose any additional housing for Benson, the alternative of the Plan making no allocations is also tested.

9.3 The introduction to the Site Assessments Report explains in detail the relationship between it and the SA SEA appraisal methodology. For completeness, this explanation is repeated here to ensure the means by which sites have been appraised is understood.

9.4 As neighbourhood plans cover much smaller areas than Strategic Housing Land Availability Assessments, they are able to consider a variety of spatial options for place making that is not possible for every Parish at the District scale. This allows for more emphasis to be placed on defining and comparing spatial options before considering the role that an individual site may play in delivering one or more of those options. The flow diagram below explains this further.



9.5 The visioning and objective work that formed the basis of early community engagement activity on the Plan provided a clear preference for the spatial plan that the Plan must adopt to growing the village in the future. Essentially, the strategy focuses on planning for an effective bypass of the village – the Relief Road - with the necessary housing to deliver that and leveraging other community benefits wherever possible and reasonable to do so.

9.6 At the same time, site assessments were undertaken by the neighbourhood planning team to ascertain the availability and simple capacity of land in and around the main village. Each site was identified as being part of one of five spatial options:

- North and East of the Village – the proposed option, defined as land north of Littleworth Road, Hale Road and Watlington Road (comprising site refs: BEN1, BEN2, BEN3 and BEN4)
- North of the Village – defined as only land north of Littleworth Road and Hale Road (comprising site refs: BEN1 and BEN2)
- East of the Village – defined as only land north of Watlington Road (comprising site refs: BEN3 and BEN4)
- South East of the Village – defined as land south of Watlington Road (comprising site refs: BEN5 and BEN6)
- South of the Village – defined as land south of St. Helen’s Avenue (comprising site refs: BEN7 and BEN8 and land south of the A4074 at Preston Crowmarsh)

9.7 The availability and capacity of the sites, drawn from the District Council’s ‘call for sites’ exercises, indicated that each of these spatial options would comprise sufficient land to deliver a total quantum of housing development to meet and exceed the District Council’s expectations in the emerging Local Plan.

9.8 All of the sites have been visited by the Neighbourhood Plan project team and their observations recorded. For each site, the observations relate to:

- its location in respect of the five spatial options
- its current/past use
- its location in relation to existing policy designations (e.g. Conservation Area),
- the nature of its surrounding land uses
- the legacy of any expressed community opinions on its development potential (either through the planning history of past development proposals or the engagement activities undertaken so far)
- the potential, by way of its location, to realise another reasonable community benefit as part of a scheme.

Reasonable Alternatives	Sustainability Objectives							
	1. Heritage	2. Landscape	3. Traffic	4. Biodiversity	5. Village Centre	6. Community Assets	7. Flooding	8. RAF Benson
No Housing Allocations	-	+	-	0	-	-	0	0
North of Village	0/-	0/-	0/-	0	0	+	0	0
East of Village	0	-	0/-	0	0	+	0	0
South East of Village	0	-	0	0	0	+	0	0
South of Village	-	-	-	0	-	+	0/-	0/-

Table F: Comparison of Reasonable Alternatives to Neighbourhood Plan Policy NPI and Sustainability Objectives

9.9 The alternative of having the Plan making no housing allocations will have a positive landscape effect, in avoiding any further incursion into the surrounding countryside than has already been consented. However, it has a number of negative effects, in failing to address the impact of traffic congestion through the village as a result of the scale of housing growth planned in this part of the District in the plan period. That congestion will harm the character of the Conservation Area, through which much of the traffic will pass, and may undermine the viability of the commercial uses in the village centre. It also fails to deliver new green infrastructure and improvements to community and play facilities.

9.10 The North and East options alone cannot deliver the bypass, thus leading to a possible negative traffic effect, as trips are generated from new housing but without the effective means to handle them on the local road network, alongside those of journeys passing through the village to elsewhere. Schemes for each site may be able to demonstrate that they achieve the minimum mitigation requirements to avoid 'severe' problems (of NPPF §32), but this assessment is looking at relative, not absolute effects to compare and contrast. It is assumed that each component site will remain capable of delivering the community facilities of the proposed option. The East option sites remain more exposed in the countryside and will have a negative landscape effect.

9.11 The South and South East options may both be able to deliver the same type and range of community facilities as the preferred option and so may have the same positive community effects. However, the South East option is as exposed in the landscape as the land north of Watlington Road, with the same relative negative landscape effects but without the positive traffic effects, as the land will play no part in delivering the Relief Road.

9.12 The South option is constrained in its housing potential by its relative negative effect on the operations of RAF Benson, hence the focus in the preferred option on part of the land delivering social infrastructure, with the positive facilities effect. The potential to use land at Preston Crowmarsh has not been proposed as part of the Local Plan, but is included here for completeness. The combination of heritage assets, flood risk areas and proximity to RAF Benson lead to a range of negative effects.

9.13 In conclusion, in no case do the other spatial options lead to as many potential positive effects as the proposed option. The differences are not stark but relative and most are a result of the focus of the proposed option, which is the only means of delivering the Relief Road. Without the opportunity to deliver that crucial piece of local infrastructure, the other options assess less well, as there are insufficient positive effects to offset the negative landscape and traffic effects. The option of 'doing nothing more than already planned', is also shown not to compare well with the proposed strategy. More than the opportunity cost of not enabling a series of public benefits, it fails to plan for the significant level of growth planned in the locality, that will have a harmful effect on Benson village.

9.14 Finally, the alternative of not distinguishing the built-up area from the surrounding countryside is assessed. Although the original proposal of defining a 'settlement boundary' on the Policies Map has been removed, the policy will continue to offer some flexibility in managing applications that come forward for housing, employment and other development adjoining the observed village edge. In doing so, the potential for negative landscape and some heritage effects of inappropriate development beyond the built up area is minimised.

Other Policies

NP5

9.15 Provision for a new burial ground may have been possible at one of the three housing site allocations. However, in practice, this was not desirable, as the viability of the Relief Road proposals requires the new developable area of each site to be used for residential purposes, with the other land within the gross site areas providing the road itself, open spaces and landscape mitigation measure. As such, this alternative is not considered 'reasonable' as defined by the Regulations.

NP21

9.16 Provision for new allotments may have been possible in a number of locations around the village edge. However, in practice, the Parish Council is reliant on acquiring land from private owners, as it does not own land for this purpose. In its negotiations with the developers of sites BEN2 and BEN3/BEN4, the Parish Council has agreed that the provision of allotments will be part of the overall open space schemes, as required by policies NP2 and NP3. As such, the alternative of negotiating access to other land around the village that

does not form part of the proposals of the Plan, is not considered 'reasonable' as defined by the Regulations.

NP23

9.17 Provision of a new playing field, youth facilities, skate park and fitness trail may have been possible, either collectively or individually, in a number of locations around the village edge. However, in practice, the Parish Council is reliant on acquiring land from private owners, as it does not own land for these purposes. In its negotiations with the developers of site BEN2, the Parish Council has agreed that the provision of allotments will be part of the overall open space schemes, as required by Policy NP2. As such, the alternative of negotiating access to other land around the village that does not form part of the proposals of the Plan, is not considered 'reasonable' as defined by the Regulations.

NP24

9.18 The proposed Local Green Spaces are the only sites in the Parish that are considered to meet the §77 NPPF criteria for that purpose. They are not assessed in comparison to each other as possible alternatives. As such, there is no requirement to consider 'reasonable alternatives' as defined by the Regulations.

9.19 All the remaining policies are development management-type policies. In each case therefore, the 'reasonable alternative' is the 'Policy Off' position, i.e. not having a policy on that matter and relying on other national or development plan policy for that purpose.

9.20 In no case is it possible to discern any clear positive or negative effect of not having the policy. 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. Aside from the site-specific policies, 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. As a result, it is considered that the reasonable alternatives to each policy will be neutral and offer no better sustainability outcome than the proposed policies.

Cumulative & In-Combination Effects

9.21 The Regulations require that this assessment considers the cumulative effects of the Neighbourhood Plan, when taken as a whole, and the potential for 'in-combination' effects, when the Plan is seen as part of a wider series of development proposals.

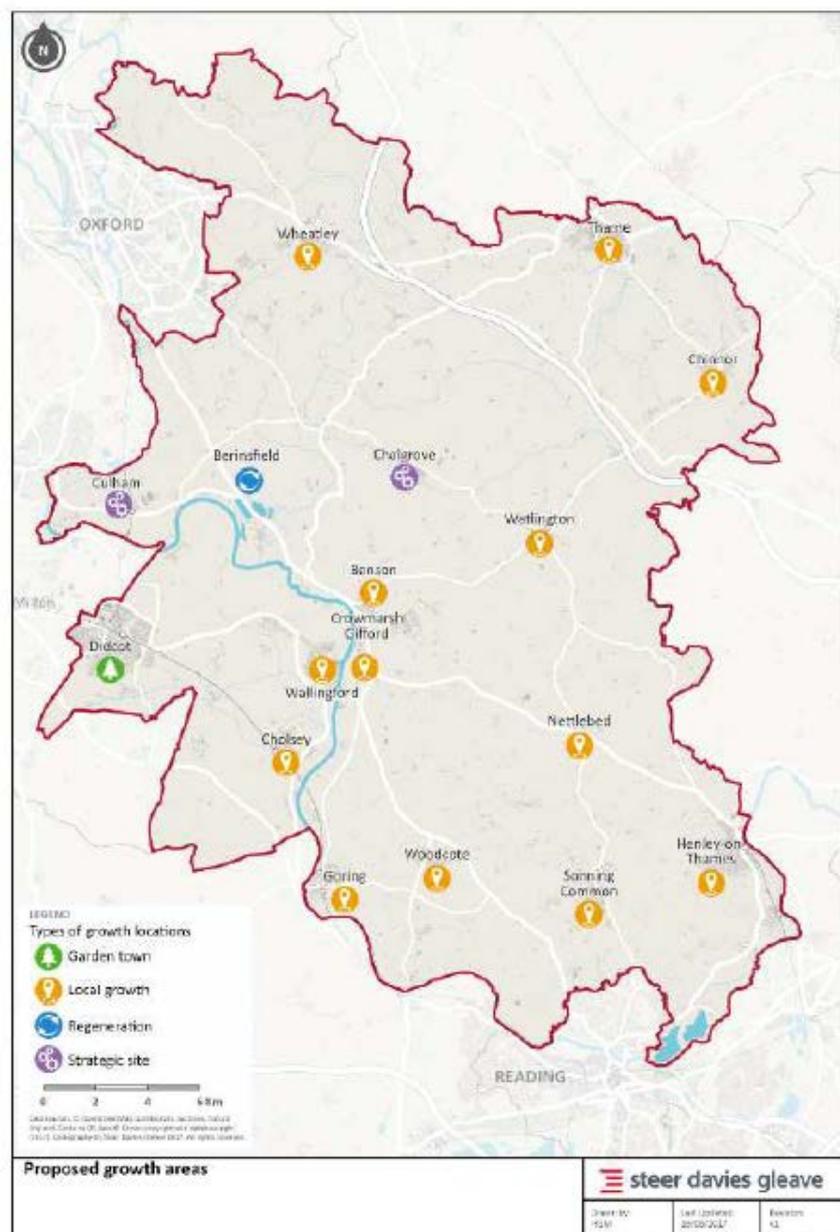
9.22 In respect of its cumulative effects, the main potential for significant effects lies with the three housing site allocations of policies NP2 – NP4. In practice, although the policies are independent, they have been framed to be considered as a whole, given the intention for each to deliver its component of the Relief Road. As noted above, their cumulative effects are generally positive but they had the potential for negative landscape effects without the mitigation measures set out in each policy. In addition, although not part of this appraisal, it is noted that there is a waste water capacity problem in this area, and the cumulative effect of the allocation policies will need to be managed through improvements to that capacity.

The effect is not therefore harmful and will not prevent the allocations, but it will affect the timing of the full implementation of the housing schemes.

9.23 Many of the remaining policies are intended to complement those policies; the others are aimed at improving the quality of life for local residents and businesses. When taken as a whole, therefore, the Neighbourhood Plan policies will deliver positive benefits for the local community, although they will result from major changes around many parts of the village.

9.24 The potential for ‘in-combination’ effects rests primarily at this local scale with the proposals of the Local Plan. Whilst that Plan requires no more contribution from Benson to meeting the supply of housing land over the period, its final proposals contain a series of major development proposals in this part of the District.

Figure 1.1: Proposed growth areas and type of growth proposed



Plan C: Sustainable Transport Study: Proposed Growth Areas (Steer Davies Gleave, September 2017, Fig 1.1, p4)

9.25 The Sustainability Appraisal of the Local Plan addresses these proposals in terms of their traffic growth and landscape/visual effects. It does not include the Neighbourhood Plan proposals, as they do not form part of the Local Plan.

9.26 In terms of traffic effects, it notes the findings of the Evaluation of Transport Impacts report of March 2017. The report noted that sections of the B4009 at Benson are operating at or above their operational capacity, but overall the route is forecast to be below its operational capacity in the preferred scenario. That said, it notes significantly higher traffic volumes through Benson with increased delays. The follow up Sustainable Transport Study of September 2017 identifies some mitigation measures to reduce the traffic growth effects that relate to Benson and its wider area. They include improved cycleway connectivity and bus service frequency to Wallingford, improvements to Culham rail services (the nearest station to Benson) and a demand responsive shuttle service between Benson, Wallingford, Didcot and Culham. These measures may go some way to mitigating the effects on the village of development planned beyond the Parish.

9.27 The combination of the three site allocations in Benson will deliver approx. 565 new homes, which is relatively insignificant in the context of the growth planned for the wider area. Of that total, the 324 homes that are in addition to the commitments already taken into account in the Local Plan are not considered to have any material effect in the wider area. But, the ability to remove traffic from the village, and to better manage traffic already generated from within it, will make a significant difference to Benson. The combination of the proposed Relief Road and the transport mitigation measures proposed as part of the Local Plan are considered to present the most effective way of positively managing those effects.

9.28 In terms of landscape and visual effects, the Appraisal noted the potential for significant negative effects in relation to the AONBs and loss of agricultural land. However, it considers that applying the proposed Policy ENVI and the adoption of the mitigation measures identified in the Landscape Capacity Assessment for Sites on the Edge of the Larger Villages Study for site allocations/masterplans/planning applications (including all three of the Benson sites), will satisfactorily minimise these effects.

10. Summary of the Assessment

10.1 The assessment indicates that the proposed policies of the Submission Plan have avoided leading to any significant, negative environment effects that are not offset by stronger, positive environmental and social effects. They will contribute, in overall terms, to achieving a sustainable pattern of growth and consolidation in the village.

10.2 This is no mean feat, given the scale of development that the Plan provides for, which exceeds the scales of housing growth in the village of the last few decades. Crucially, the spatial plan has found a way of growing the village to secure vital benefits – the Relief Road and new social infrastructure – without causing significant harm to its essential rural character. Indeed, these effects ought to sustain that character of the village, despite residual negative landscape effects, which cannot be entirely avoided. In the local community’s judgement, the benefits will outweigh those costs.

10.3 The alternative strategies comprising smaller numbers of development sites do not compare unfavourably with the proposed allocations for the most part, as it is a composite of four of the eight main sites assessed. The crucial difference is that without the cumulative delivery of the Relief Road, which is dependent on each of those four sites, the other social benefits are not sufficient to outweigh their negative landscape effects. It is reasonable for the landowners expect to benefit from an uplift in land value as a result of allowing for a series of housing developments for them to be willing to release land for the Relief Road and to collectively pay for and deliver it. This assessment is, however, dependent on those benefits being secured as the local community intends and planning applications that fail to live up to these expectations in due course should expect to be refused.

10.4 Most of the policies will have mostly neutral effects. Some will have positive effects, especially in terms of collectively ensuring that the distinctive character of the village will remain generally unharmed and improved through the better management of traffic, especially in the historic centre.

10.5 It is therefore possible to conclude the policies of the Submission Plan will not have any significant environmental effects that cannot be justified through their wider sustainability, notably social, benefits.

11. Monitoring

11.1 The Parish Council will monitor the progress in the implementation of the Neighbourhood Plan using the measures identified in Table C. The data for some of these measures is collected by the District Council in its planning monitoring reports. In other cases, the Parish Council will endeavour to collect data to report on the progress of the plan. It is likely the Council will choose to review the Neighbourhood Plan on a five yearly cycle and it will be informed by this monitoring activity in considering if and how to update the policies.

APPENDIX I

COMMENTARY ON THE EFFECTS OF THE NEIGHBOURHOOD PLAN PROPOSALS IN RELATION TO THE FINDINGS OF THE INTERIM SUSTAINABILITY APPRAISAL OF THE SOUTH OXFORDSHIRE LOCAL PLAN (2015)

SA Objectives	SA Summary of Key findings Benson Village	Mitigating adverse effects/maximising beneficial effects	Neighbourhood Plan SA Commentary
1,2 Homes, Crime	Housing development of any of the sites considered will have a major positive effect to provide the required housing need. New development may help create safer places through greater pedestrian flows and provide funding through development to ensure secure design principles, which will have a minor positive effect .	Ensure that development is designed to reduce crime and the fear of crime. Ensure good urban design principles are implemented. Ensure affordable housing is provided.	The positive effect of housing supply will be stronger , as the Plan makes provision for approximately 600 additional homes to those already consented. All the sites are capable of delivering on-site affordable housing in line with SODC policy.
3,4 Health, Well-being	Further housing offers the opportunity to support and enhance the village; however growth pressure on existing services in places where housing is already allocated may occur, therefore minor positive and minor negative effects were noted for all sites. Major negative effects have been identified for sites with regard to noise from aircraft at BEN 7 and BEN 8, all other sites minor negative effects are possible. The noise from aircraft can have a negative effect on people's health and well-being. Sites BEN 7 and BEN 8 propose a higher risk to any future residents due to the	Ensure good urban design principles are implemented to create good access to Benson Village. Carry out an acoustic study to inform site selection and mitigation required. Work with RAF Benson to ensure safety concerns are resolved. Work with RAF Benson to consider and reduce any safety concerns	The scale of development provided for is sufficient to enable significant improvements in local services as well as to increase footfall. There will therefore be only positive effects. The Plan is not proposing to allocate land at BEN8 and proposes primarily non-housing uses at BEN7, with small enabling scheme on that part of the site least/not affected. There will be neutral effects as a result.

	<p>location beneath the take-off and approach area for RAF Benson, thus leading to minor negative effect.</p> <p>There are allotments in the village within easy access of all sites, access to allotments can have minor positive effects on people's health and well being.</p>	<p>related to BEN 7 and BEN 8.</p> <p>Ensure the allotments and PROW are protected.</p>	<p>Policies NP2 – NP5 all require new allotments and open spaces. There will therefore be major positive effects.</p>
5 Pollution	<p>In the short term noise pollution may increase during the construction phase, leading to a minor negative effect for all sites assessed.</p> <p>All sites are greenfield land and in the long term, this may result in pollution from surface run-off, leading to a minor negative effects for all sites assessed.</p>	<p>Ensure phasing of development occurs to reduce noise impacts.</p> <p>Encourage the use of permeable surfaces and SUDS.</p>	<p>Policy NP30 (Benson Brook) requires all relevant proposals to have regard to their effects on the ecology of this watercourse. Policy NP33 requires all proposals to incorporate appropriate sustainable drainage systems, which should successfully mitigate such risks, resulting in neutral effects.</p>
6 Travel Choice	<p>The A4074 is adjacent to all the proposed sites, buses run every half an hour to Oxford, Reading and Wallingford, minor positive effects where noted.</p> <p>Benson Village does not have a train station, therefore minor negative effects where identified with regard to transport, travel choice, accessibility and reducing the need to travel by car.</p> <p>Walking distance to the</p>	<p>Work with infrastructure providers to identify where an increase in sustainable modes of transport is required.</p> <p>Work with infrastructure providers to identify where an increase in sustainable modes of transport is required. This should include, cycle ways, linking to green infrastructure. Ensure the ETI results inform the decision making process.</p> <p>Ensure good urban design</p>	<p>It is possible that some existing bus services may be re-routed along the proposed bypass to serve the new housing schemes at BEN1 – BEN5 or that new services (using the B4009 to serve Chalgrove to the north) may be established. Together with the continuation of existing regular A4074 services between Oxford, Reading and Wallingford, the</p>

	<p>village is no more than 10 minutes for all sites, however BEN 2 is closer to the bus stops, approx. 5 minutes away, therefore minor positive effects were identified. The northern section of BEN1 does not have good access to the village, therefore additional minor negative effects are noted.</p> <p>The nearest secondary school is in Wallingford and cycling to Wallingford is approx. 20 minutes.</p>	<p>principles are implemented to create good access to Benson Village.</p> <p>Work with infrastructure providers to identify where an increase in sustainable modes of transport is required. This should include, cycle ways, linking to green infrastructure.</p>	<p>village will therefore benefit from good bus services. Policy NP11 will ensure that all the new housing schemes are capable of accommodating services and bus stops and contain measures in their travel plans to promote access to jobs, schools and services using public transport. In combination, these changes will have net positive effects.</p>
<p>7 Biodiversity</p>	<p>The following European Sites need to be considered when identifying areas for additional housing development. Aston Rowant SAC, Chiltern Beechwoods SAC, Cothill Fen SAC, Hartslock Woods SAC, Little Wittenham SAC, Oxford Meadows SAC. Additional development can lead to increased emissions from vehicle movement and put strain on water resources, both can have detrimental effects on SAC's. Therefore the results are uncertain until a Habitats Regulation Assessment has been carried out to assess the impacts on these.</p> <p>Possible minor negative effects have been identified for BEN1. A BAP Phase I survey has been carried out and identified legally protected Eurasian Badger present on site and willow trees approximately 10 metres tall on the western boundary and low</p>	<p>Ensure the Habitats Regulation Assessment Screening is undertaken to identify appropriate areas for additional housing.</p> <p>Ensure protection of protected species throughout all development phases.</p>	<p>The effects remain uncertain but will be addressed through a screening before the Plan is submitted. SODC and Natural England will be asked to give this special attention in commenting on the Pre Submission Plan.</p> <p>The allocation policies NP2 – NP6 and policies NP27 (Biodiversity Net Gain), NP28 (Wildlife Corridors) and NP29 (Green Infrastructure) combined should ensure that the protection of these</p>

	<p>hedging on all other boundaries of the site.</p> <p>Additional development in these areas could assist with funding for biodiversity enhancement for example: green infrastructure, wildlife areas, buffer zones etc, therefore minor positive effects were identified for all sites.</p> <p>Mature hedging has been noted on the following site boundaries BEN: 5, 6, 7 and 8 any removal of these would result in short and long term minor negative effects. Hedgerows provide habitats for a range of species.</p>	<p>Encourage green infrastructure and biodiversity enhancement schemes; these are also beneficial to flood prevention and resilience to climate change.</p> <p>Ensure all hedging is protected, throughout all development phases</p>	<p>species is effective and complemented by a range of measures to deliver a significant biodiversity net gain and will therefore have positive effects.</p> <p>The allocation policies make specific requirements for the development schemes to minimise the loss of hedgerows. Other policies will lead to more hedgerow planting as part of these schemes to deliver net positive biodiversity effects.</p>
8 Landscape	<p>None of the sites are within the Green Belt or the Chilterns AONB, however all sites are within the setting of the North Wessex Downs AONB, therefore potential minor negative effects have been noted. The LCA has recommended that the following sites should be reduced in size to reduce the potential impacts: BEN 1, 2, 3, 5 and 6.</p> <p>The LCA recommended that BEN 7 and 8 could potentially be considered as whole sites for development depending on implementation.</p> <p>All sites have been classified as Grade 2 Agricultural Land Classification, which are referred to as 'Best and Most Versatile' land; therefore development of</p>	<p>A full detailed landscape and visual impact assessment will be required to inform the final capacity of the sites.</p> <p>A full detailed landscape and visual impact assessment will be required to inform the final capacity of the sites.</p> <p>Considers ways to mitigate the loss of good quality agriculture land.</p>	<p>Full LVIA's are not considered necessary to justify the allocation of the sites in policies NP2 – NP6, but Policies NP31 and NP32 require proposals to show how the development schemes will aim to minimise their effects on the landscape at the planning application stage.</p> <p>Minor negative effects are inevitable, given the open character of the landscape and its agricultural land classification.</p> <p>Although the village lies within the setting of the AONB, it is an established settlement in that landscape and the scale of new development is not</p>

	any of these sites may result in minor negative effects .		considered to be so great as to materially change the visual relationship between the village and the AONB.
9 Heritage	<p>Archaeological restraints have been identified at BEN 7 & 8 resulting in potential major negative effects.</p> <p>BEN 1 forms part of the setting of the Benson Conservation Area to which it is adjacent, therefore potential major negative effects have been identified.</p> <p>BEN 2, 3, 5 and 6 have scored minor negative effects, although no cultural or historical interests have been identified, development of the sites may affect the character of the area.</p>	<p>Potential major effects may not prevent development, it may be possible to mitigate effects. With regard to the historic environment: A predetermination archaeological desk-based assessment and evaluation should be undertaken to establish a suitable and appropriate level of mitigation.</p> <p>Potential major effects may not prevent development, it may be possible to mitigate effects. In order to protect the historic environment, the Council will ensure that all new development complies with the South Oxfordshire Design Guide. Which will require high quality design and materials, sensitive building heights and would have to preserve and enhance the historic environment.</p> <p>In order to protect the historic environment, the Council will ensure that all new development complies with the South Oxfordshire Design Guide. Which will require high quality design and materials, sensitive building heights and would</p>	<p>Policy NP6 has identified the archaeological interest of BEN7 and requires this to be understood and addressed at the planning application stage. Site BEN8 is not proposed as a site allocation. Although there is the potential for negative effects, this is not inevitable.</p> <p>Policy NP2 relates to the proposed Phase II land of this larger, consented site. That land lies beyond the setting of the Conservation Area and will therefore have a neutral effect. Together with sites BEN2 – BEN5, the provision of the ‘Relief Road’ as a bypass to remove much of the harmful through traffic from the historic village centre will have major positive effects.</p> <p>The BEN2 – BEN5 sites lie beyond the setting of the Conservation Area and will therefore have neutral effects in that respect.</p>

		have to preserve and enhance the historic environment.	
10 Climate Change	Additional dwellings will put pressure on resource use including: energy, water capacity and sewage capacity, however it is assumed that sustainable design principles will be implemented. New development offers the opportunity to implement sustainable design principles which may result in minor positive effects .	Promote sustainable building practices which conserve energy, water resources and materials. Continue to work with Thames water to ensure water and sewage capacity is maintained.	
11 Flooding	BEN1 is approximately 5.9 hectares, however the western part of site is within flood zone 2 and 3, any development will result in major negative effects .	Avoid development in flood zones, carry out a FRA to inform decision making.	Policy NP2 relates to land outside of the flood risk zones 2 and 3 are will therefore have neutral effects .
12 Waste	The development of new housing will lead to construction and demolition waste being produced, this may result in minor negative effects .	Avoid development in flood zones, carry out a FRA to inform decision making.	
13 Employment	Additional housing will increase the population and maintain and enhance the rural economy, which will result in minor positive effects .	Encourage green and eco technologies, this will lead to an increase in skills locally and assist in developing new businesses.	The larger scale of housing development proposed will have major positive effects as it leads to demand for more space in the village centre to supply local services and will help meet the needs of larger population centres for a larger working age population in the local area.
14, 15 & 16 Workforce, Tourism	No direct impact		

17 Community	The Council has involved the community in the decision making process.	Continue to work with the local community and the Parish council.	The Neighbourhood Plan is the embodiment of community engagement in the planning system.
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South Oxfordshire Local Plan - Interim Sustainability Appraisal Objectives:

- 1 To help to provide existing and future residents with the opportunity to live in a decent home and in a decent environment supported by appropriate levels of infrastructure
- 2 To help to create safe places for people to use and for businesses to operate, to reduce anti-social behaviour and reduce crime and the fear of crime.
- 3 To improve accessibility for everyone to health, education, recreation, cultural, and community facilities and services.
- 4 To maintain and improve people's health, well-being, and community cohesion and support voluntary, community, and faith groups.
- 5 To reduce harm to the environment by seeking to minimise pollution of all kinds especially water, air, soil and noise pollution.
- 6 To improve travel choice and accessibility, reduce the need to travel by car and shorten the length and duration of journeys.
- 7 To conserve and enhance biodiversity
- 8 To improve efficiency in land use and to conserve and enhance the district's open spaces and countryside in particular, those areas designated for their landscape importance, minerals, biodiversity and soil quality.
- 9 To conserve and enhance the district's historic environment including archaeological resources and to ensure that new development is of a high quality design and reinforces local distinctiveness.
- 10 To seek to address the causes and effects of climate change by:
 - a) securing sustainable building practices which conserve energy, water resources and materials;
 - b) protecting, enhancing and improving our water supply where possible
 - c) maximizing the proportion of energy generated from renewable sources; and
 - d) ensuring that the design and location of new development is resilient to the effects of climate change.
- 11 To reduce the risk of, and damage from, flooding.
- 12 To seek to minimise waste generation and encourage the reuse of waste through recycling, compost, or energy recovery.
- 13 To assist in the development of:
 - a) high and stable levels of employment and facilitating inward investment;
 - b) a strong, innovative and knowledge-based economy that deliver high-value-added, sustainable, low-impact activities;
 - c) small firms, particularly those that maintain and enhance the rural economy; and
 - d) thriving economies in market towns and villages.

- 14 To support the development of Science Vale as an internationally recognised innovation and enterprise zone by:*
- a) attracting new high value businesses;*
 - b) supporting innovation and enterprise;*
 - c) delivering new jobs;*
 - d) supporting and accelerating the delivery of new homes; and*
 - e) developing and improving infrastructure across the Science Vale area.*
- 15 To assist in the development of a skilled workforce to support the long term competitiveness of the district by raising education achievement levels and encouraging the development of the skills needed for everyone to find and remain in work.*
- 16 To encourage the development of a buoyant, sustainable tourism sector.*
- 17 Support community involvement in decisions affecting them and enable communities to provide local services and solutions.*