



East Hagbourne

NEIGHBOURHOOD DEVELOPMENT PLAN -
2018 to 2033

Submission Version 17 September 2018

Strategic Environmental Assessment (SEA)

Strategic Environmental Assessment (SEA) of the East Hagbourne Neighbourhood Plan

Environmental Report Update:
Non-technical Summary

September 2018

DOCUMENT DETAILS					
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1	Sept 2018	Non-technical Summary (NTS) of the Environmental Report Update submitted alongside the Neighbourhood Plan	Mark Fessey Associate	Alastair Peattie Associate	Steve Smith Technical Director

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Introduction

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

The EHNP is being prepared by East Hagbourne Parish Council, following a successful application to have the Parish designated as a Neighbourhood Plan area in 2016. The EHNP is being prepared in the context of the South Oxfordshire Local Plan, and specifically will seek to supplement the strategic policies of the Local Plan with detailed policies and proposals to address local place-based issues.

SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising the positives. SEA of the EHNP is a legal requirement (following the plan having been ‘screened-in’ by the District Council).

The Neighbourhood Plan is at an advanced stage of preparation, ‘submission’ version now having been prepared for submission to South Oxfordshire District Council, under Regulation 15 of the Neighbourhood Planning Regulations (2012), and in-turn publication under regulation 16.

As part of the SEA process an Environmental Report Update is submitted alongside the plan, and will in turn be published alongside the plan. The report is an ‘update’ to the Environmental Report published for consultation alongside the ‘pre-submission’ version of the plan in March 2018.

This is a Non-technical Summary (NTS) of the Environmental Report Update.

Structure of the Environmental Report Update / this NTS

SEA reporting essentially involves answering the following questions in turn:

1. What has plan-making / SEA involved **up to this point**?
 - i.e. preceding finalisation of proposals for consultation.
2. What are the SEA findings **at this current stage**?
 - i.e. in relation to the proposals published for consultation.
3. What are the **next steps**?

Each of these questions is answered in turn below. Firstly though there is a need to set the scene further by answering the question ‘What’s the scope of the SEA?’

What’s the scope of the SEA?

The scope of the SEA is reflected in a list of topics and objectives. Taken together, this list indicates the parameters of SEA, and provides a methodological ‘framework’ for assessment.

The SEA framework

Topic	Objectives
Biodiversity	Protect and enhance all biodiversity and geological features.
Climate change	Reduce the level of contribution to climate change made by activities within the Neighbourhood Plan area
	Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding
Landscape and heritage	Protect, maintain and enhance the cultural heritage resource within the Neighbourhood Plan area, including the historic environment and archaeological assets.
	Protect and enhance the character and quality of landscapes and townscapes.

Topic	Objectives
Land and natural resources	Ensure the efficient and effective use of land.
	Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste.
	Use and manage water resources in a sustainable manner.
Population and community	Cater for existing and future residents’ needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities.
	Reduce deprivation and promote a more inclusive and self-contained community.
	Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.
Health and wellbeing	Improve the health and wellbeing residents within the Neighbourhood Plan area.
Transportation	Promote sustainable transport use and reduce the need to travel.

PLAN-MAKING / SEA UP TO THIS POINT

An important element of the required SEA process involves assessing ‘reasonable alternatives’ in time to inform development of the draft proposals, and then publishing information on reasonable alternatives for consultation alongside the draft proposals.

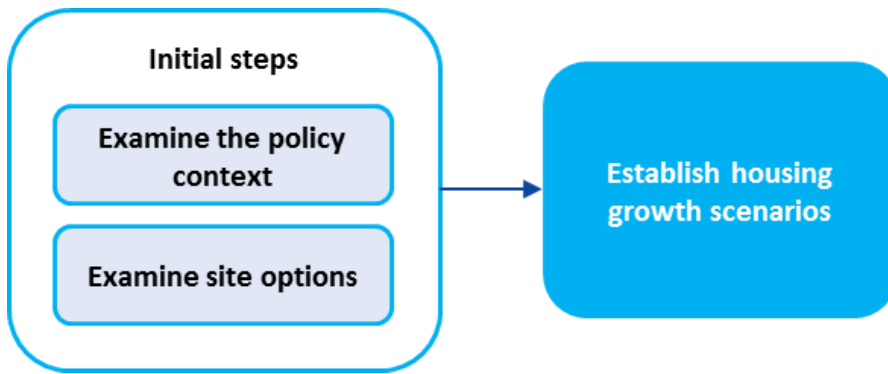
As such, Part 1 of the Environmental Report Update explains how work was undertaken to develop and assess a ‘reasonable’ range of alternative approaches to the allocation of land for housing, or **housing growth scenarios**.

Specifically, Part 1 of the report -

- 1) explains the process of **establishing** the reasonable alternatives;
- 2) presents the outcomes of **assessing** the reasonable alternatives; and
- 3) explains reasons for **establishing** the preferred option, in light of the assessment.

Establishing reasonable alternatives

The main report explains how reasonable alternatives were established subsequent to process of considering the strategic policy context (‘top down’ factors) and the site options in contention for allocation (‘bottom-up’ factors). The figure below presents a summary.

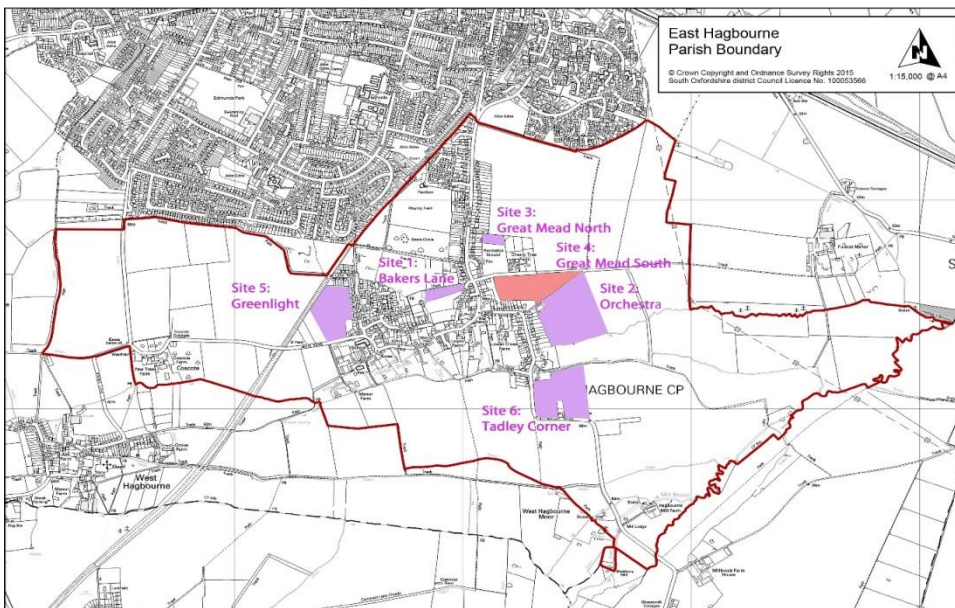


A key ‘policy context’ consideration is Policy H8 of the emerging South Oxfordshire Local Plan, which requires East Hagbourne to expand by 5% to 10% over the plan period to 2033. The Parish comprises 500 dwellings, which means a need for up to 50 additional homes.

Important context is also provided by Paragraph 14 of the National Planning Policy Framework (NPPF, 2018), which incentivises Neighbourhood Plans to take a proactive approach to housing, by specifying a mechanism for ensuring that where a Neighbourhood Plan allocates land for housing there will be a degree of protection against ‘speculative’ housing applications, i.e. applications on sites not allocated within a plan.

With regards to work to examine site options, the main report explains how the Parish Council led on a staged process of identifying and then assessing site options in isolation, before firstly identifying a shortlist of six better performing sites (see figure below), and then finally identifying two best performing sites that should be taken forward to the next stage, namely assessment of housing growth scenarios.

The shortlist of six site options



Ultimately, in light of the two ‘initial steps’ discussed above, the following two reasonable alternative housing growth scenarios were identified for assessment -

- 1) Allocate Greenlight only (74 homes) only
- 2) Allocate both Greenlight (74 homes) and Orchestra (up to 78 homes)

N.B. Greenlight has outline planning permission, and hence can now be considered - on the balance of probability - part of the ‘baseline’ (i.e. something that will happen regardless of the EHNP). However, there is still the potential to provide proactive support through the EHNP. Specifically, ‘allocation’ of the site through the EHNP, and the establishment of clear policy, could help to expedite and guarantee the success of the forthcoming reserved matters application. Also, allocation of the site can be considered a proactive step in the sense that there is a small chance/risk that the site will not be developed, for whatever reason, and hence the existing planning permission will ‘lapse’.¹ Were permission to lapse, then an allocation within the EHNP would mean that the site promoters could submit another application.

Assessing reasonable alternatives

Summary alternatives assessment findings are presented within the table below. Within each row (i.e. for each of the topics that comprise the SA framework) the columns to the right hand side seek to both categorise the performance of each option in terms of ‘significant effects’ (using red / green) and also rank the alternatives in relative order of performance.

¹ Anecdotal evidence suggests that perhaps 5 to 10% of planning permissions nationally ‘lapse’. Data is not available for SODC.

Summary alternatives assessment findings

Objectives	Option 1 Greenlight only	Option 2 Greenlight & Orchestra
Protect and enhance all biodiversity and geological features	=	=
Reduce the level of contribution to climate change	=	=
Support resilience to the potential effects of climate change, inc. flooding	=	=
Protect, maintain and enhance the cultural heritage resource	★1	2
Protect and enhance the character and quality of landscapes and townscapes	★1	2
Ensure the efficient and effective use of land .	★1	2
Promote sustainable waste management solutions	=	=
Use and manage water resources in a sustainable manner.	=	=
Cater for existing and future residents' needs as well as the needs of different groups in the community....	=	=
Reduce deprivation and promote a more inclusive and self-contained community .	=	=
Provide everyone with the opportunity to live in good quality, affordable housing , and ensure an appropriate mix....	2	★1
Improve the health and wellbeing residents within the Neighbourhood Plan area.	★1	2

Assessment conclusion

The broad conclusion is that allocation of both sites (Option 2) would lead to a range of concerns over-and-above Option 1, most notably in respect of landscape and loss of best and most versatile (potentially 'grade 1') agricultural land. It is fair to conclude that allocation of both sites (Option 2) is supported in respect of 'housing' objectives; however, this is not a clear cut conclusion, as there is evidence to suggest that local housing needs (i.e. needs arising from the Parish) would be met under Option 1.

N.B. it is important to highlight a degree of uncertainty regarding the conclusion that Option 1 would be preferable in respect of the objectives identified above (heritage, landscape, land etc). This is on the basis that Option 1 could feasibly give rise to a risk of speculative applications receiving permission. This risk would arise under a scenario whereby SODC has a land supply of between three and five years, and a planning inspector tasked with deciding a planning appeal does not accept that allocating the Greenlight site only through the EHNP results in the 'protection' provided by the December 2016 Ministerial Letter (see discussion at para 6.2.4), and para 14 of the NPPF (2018), being engaged. It is the view of SODC and the Parish Council, at the current time, that allocation of Greenlight only (Option 1) should lead to the protection being engaged; however, there is a degree of uncertainty in the absence of known national precedents on this matter.

Establishing the preferred option

The following is the Parish Council's response to the assessment of reasonable alternative housing growth scenarios presented above -

"The Parish Council broadly agrees with the assessment findings presented above, and hence supports Option 1, i.e. the allocation of Greenlight only.

The Parish Council believes that allocation of Greenlight equates to a proactive approach to supporting housing growth through the EHNP, and hence the protection against speculative housing applications - as provided for by the Ministerial Letter of 12 December 2016, and para 14 of the NPPF (2018) - will be engaged.

The Parish Council recognises and accepts that there is a degree of uncertainty regarding whether 'the protection' will be engaged, and hence a degree of risk associated with Option 1, but concludes that the risk is sufficiently small. The risk magnitude is significant, in that speculative applications totalling up to 400 homes are currently being promoted; however, the Parish Council (as advised by SODC) considers the risk likelihood to be low. The overall risk is not sufficient to lead the Parish Council to conclude that Option 2 is preferable, given the issues associated with the Orchestra site and concerns regarding the cumulative effects of growth at both Greenlight and Orchestra (i.e. the effects associated with growth totalling up to 163 homes over the plan period)."

ASSESSMENT FINDINGS AT THIS STAGE

Part 2 of the Environmental Report presents an Assessment of the Pre Submission Plan. Assessment findings are presented as a series of narratives under the 'SEA framework' headings. The following overall conclusion is reached -

The assessment highlights the plan as including a particular focus on heritage, landscape and residents needs / community / housing mix. Indeed, the plan is predicted to result in 'significant positive effects' in terms of these issues/objectives.

However, this prediction is made with some uncertainty, as there is little certainty regarding the number and nature of development proposals that the EHNP policies will be applied to. It may prove that policies are applied when determining the forthcoming reserved matters application at the Greenlight site (74 homes) and then subsequently applied only for minor infill development applications. Conversely, it could be that there are further 'speculative applications' for significant greenfield extensions in the future, to which policies will be applied.

The assessment also highlights the plan as performing well in terms of 'housing' in the sense that the proposal is to allocate the Greenlight site, and thereby proactive support the timely delivery of that site. There is little or no reason to suggest that any policies in the plan, or the policies acting in combination, are in any way contrary to the achievement of housing objectives.

Next steps

Part 3 of the Environmental Report answers– *What happens next?* – by discussing plan finalisation and monitoring.

Plan finalisation

Subsequent to publication of the Submission Plan under Regulation 16 of the Neighbourhood Planning Regulations, **Regulation 17** requires that the Local Authority submits (to the person appointed to carry out the Examination) the Proposed Plan and a copy of any representations which have been made in accordance with Regulation 16. It may be appropriate for the Local Authority to also submit the updated Environmental Report, with a view to informing the Examination.

Regulations 18 and 19 require that, subsequent to the Examination, the Local Authority publishes the Examiner's Report and a Decision Statement. The Decision Statement sets out whether or not the Local Authority is prepared to 'make' (i.e. adopt) the plan. If the Local Authority is prepared to make the plan, then a referendum can be held. It may be appropriate for the Local Authority to also publish an updated Environmental Report, with a view to informing the Referendum.

Regulation 20 states what the Local Authority must do when the plan is 'made' (i.e. adopted). The SEA Statement must be published alongside the made Plan, with a view to providing:

- information on the decision, i.e. an explanation of why the final plan approach was decided-upon in light of SEA and consultation; and
- measures decided concerning monitoring.

Monitoring

At the current time, there is a need to present 'measures envisaged concerning monitoring'.

Section 6.2 of the plan document deals with monitoring, putting in place a mechanism for an annual meeting to discuss plan implementation, and then a formal review of the plan after five years if necessary. This approach is broadly supported.

A key matter to monitor / discuss at the annual meetings will be the impacts of the Greenlight site, e.g. in respect of traffic / road safety and perceptions of village landscape and historic character. Should it transpire that impacts are greater than currently envisaged; then there could be a strong basis for setting more stringent policy (to be applied when determining any future applications), with a view to avoiding cumulative impacts to East Hagbourne. There is a need to avoid the gradual erosion of the villages' unique qualities, which are valued by residents, and which can and should contribute to Didcot Garden Town objectives.