

Strategic Environmental Assessment (SEA) for the Wallingford Neighbourhood Plan

Environmental Report Update

Non-technical Summary

February 2020

Quality information

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Revision History

Revision	Revision date	Details	Authorized	Name	Position
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1. Introduction

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

The WNP is being prepared by Wallingford Town Council in the context of the adopted South Oxfordshire Local Plan and the new emerging Local Plan.¹ Once the WNP has been 'made' it will have material weight when deciding on planning applications, alongside the latest adopted South Oxfordshire Plan.

SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising the positives. Central to the SEA process is preparation of an Environmental Report, which must then be published for consultation alongside the draft plan.

The Environmental Report for the WNP was published alongside the draft ('pre-submission') version of the plan in September 2019. At the current time an update to the Environmental Report is published for consultation. This is the Non-technical Summary 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**?

- Including in relation to 'reasonable alternatives'.

2) What are the SEA findings **at this stage**?

- i.e. in relation to the draft plan.

3) What happens **next**?

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, providing a methodological 'framework' for assessment.

¹ The existing Local Plan comprises the Saved Policies of the Local Plan 2011 (adopted 2006) and the Core Strategy (adopted 2012) - see southoxon.gov.uk/services-and-advice/planning-and-building/planning-policy/our-development-plan

The SEA framework

SEA topic	SEA objective
Air quality	Improve air quality and minimise and/or mitigate against all sources of pollution.
Biodiversity	Protect and enhance all biodiversity and geological features.
Climate change	Reduce the level of contribution to climate change made by people and activities
	Support resilience to the potential effects of climate change, including flooding
Landscape and historic environment	Protect, maintain and enhance the cultural heritage resource, including the historic environment and archaeological assets.
	Protect and enhance the character and quality of landscapes and townscapes.
Land, soil and water resources	Ensure the efficient and effective use of land.
	Encourage the reduction, re-use and recycling of waste.
	Use and manage water resources in a sustainable manner.
Population / community	Cater for existing and future 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	Improve the health and wellbeing of residents.
Transport	Promote sustainable transport use and reduce the need to travel.

2. 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.

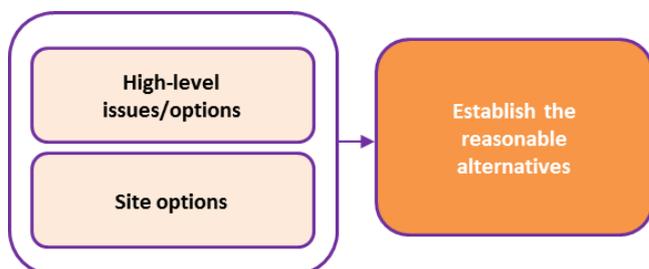
As such, Part 1 of the Environmental Report Update explains how work was undertaken to develop and assess a 'reasonable' range of alternative approaches to the allocation of land for development, or 'growth scenarios'.

Specifically, Part 1 of the report –

- 1) Explains the process of **establishing** the reasonable alternatives
- 2) Presents the outcomes of **assessing** the reasonable alternatives
- 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.



Ultimately two reasonable alternatives were established:

- **Option 1** – allocation of Sites E and C
- **Option 2** – additional allocation of Site D for ~170 dwellings and ~3 ha of employment.

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 SEA 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 order of performance. Also, '=' is used to denote instances where the alternatives perform on a par (i.e. it not possible to differentiate between them).

Summary alternatives assessment findings

Objectives	Option 1: The baseline scenario	Option 2: Additional allocation of Site D (mixed use)
Air quality	★1	2
Biodiversity	★1	2
Climate change	=	=
Landscape and historic environment	★1	2
Land, soil and water resources	★1	2
Population and community	=	=
Health and wellbeing	★1	2
Transportation	★1	2

Assessment conclusion

A headline conclusion is that Option 1 performs best in terms of all objectives, most notably in respect of 'land soil and water resources'. Taking each objective in turn:

- Air quality - the air quality assessment submitted as part of the recent planning application at Site D finds: *"Overall, it is concluded that there are no air quality constraints to the proposed residential development"*. However, taking a precautionary approach, it is considered appropriate to highlight an air quality concern associated with Option 2, noting the town centre AQMA, and the established issue regarding the historic road layout in the town centre. The town centre road network is known to be operating at capacity (see discussion in Appendix III), such that improving vehicle flow rates through mitigation is not possible. Any increase in traffic levels would be detrimental to the AQMA.
- Biodiversity - Bradford's Brook runs along the northern edge of Site D, and work undertaken as part of the recent planning application has served to highlight that it does act as ecological corridor, supporting populations of notable species of conservation concern including bat species and water vole. Furthermore, there is a mature hedgerow along the edge of the site, some of which would likely need to be lost for access purposes (the current application would see a loss of 270m). There would be good potential to buffer sensitive habitats as part of any planning application, and to deliver targeted enhancements (e.g. as discussed as part of the recent planning application), such that a 'net gain' in biodiversity may be achievable; however, taking a precautionary approach, the sensitivities associated with the site serve to suggest that Option 2 performs relatively poorly.
- Climate change - a foremost consideration is climate change adaptation, and in this respect Site D is unconstrained, in that the Bradford Brook is not associated with any notable flood risk (i.e. the entire site falls within Flood Risk Zone 1).
- In respect of landscape, key sensitivities are the North Wessex Downs AONB, which is located to the north and west of the site at a distance of approximately 600m, and the Chilterns AONB, which is located to the east of the proposed development at a distance of approximately 920m (and associated with higher ground). Work undertaken as part of the current planning application concludes that: *"Importantly no publicly accessible views were obtained from the Chilterns AONB and no significant or negative publicly accessible views were available from the North Wessex Downs AONB."* This is on the basis that the site would be viewed in the context of the industrial estate to the north and the committed development site to the southeast (indeed, it is fair to say that development would round off the urban edge). However, the work does also discuss some more localised landscape and visual impacts, including to views from the Cholsey and Wallingford heritage railway, which runs adjacent to the east.
- In respect of the historic environment, there are no listed buildings in proximity to the site; however, there are notable concerns in respect of archaeology. A geophysical survey and programme of evaluation trenching, undertaken as part of the current planning application, has established the presence of an area of Bronze Age remains in the north western part of the site, and extensive later prehistoric and Roman settlement and associated remains occupying most of the eastern and central areas of the site. The recent planning applicants conclude (within the Design and Access Statement): *"While of considerable archaeological interest, the remains that have been demonstrated to be present, are not of sufficient importance to be a design constraint to development (i.e. the remains do not merit preservation in-situ)."* In other words, the conclusion is that it will be sufficient to undertake excavation and preservation of finds as part of construction. However, taking a precautionary approach, it is appropriate to flag archaeology as a constraint that serves to suggest that Option 2 performs relatively poorly.
- Land, soil and water resources - Site D is likely to comprise best and most versatile agricultural land, on the basis of the following evidence: 1) the low resolution 'provisional' dataset suggesting that the land comprises 'grade 2' quality land (where grades 1, 2 and 3a are classed as best and most versatile); 2) a detailed agricultural land survey completed as part of the recent planning application finds the site to mostly comprise grade 3a quality land; and 3) the nationally available map of land surveyed in accordance with the "Post 1988 Agricultural Land Classification (England)", as available at www.magic.gov.uk, shows adjacent land (Site E) to comprise grade 2 quality land.
- Population and community - there is little argument for higher growth (Option 2) in respect of meeting housing and employment objectives, as the target figures set by the emerging South Oxfordshire Local Plan will be exceeded under Option 1. There is also a need to consider the possibility that exceeding the SODC growth target may place strain on services and facilities.

- Health and wellbeing - the Oxfordshire CCG has indicated that health services in Wallingford cannot support a higher level of growth, and no solution has been found to resolve this problem due to the constrained medical centre site, leading to a likelihood of patients having to travel to other health centres at Goring and Didcot. There are also certain concerns in respect of safe pedestrian and cycle access, including as a result of school children potentially passing through the adjacent Industrial Estate in order to access the committed primary school at Site B, to the north. See further discussion below. There are also concerns in respect of 'bad neighbour' employment uses (e.g. noise pollution) in close proximity to housing, although the potential for implement a soft transition between housing and industrial or distribution uses can be envisaged.
- Transport - Oxfordshire County Council raised an objection to the recent planning application on the basis that: *"The site itself is in a very isolated position, with the railway line and Bradford's Brook running along its northern and eastern boundaries and the A4130 running along the south-western boundary"*. Several potential upgrades to walking and cycling infrastructure were discussed as part of the recent planning application, including to enable safe cycling to Cholsey Railway station and walking/cycling to the town centre; however, there are a number of detailed design / structural constraints that might prove costly to overcome. OCC notably stated:

"Despite the applicant's proposed provision of a shared use path connecting into Hithercroft Road, this site is extremely poorly located, being disconnected from existing walking and cycling routes. The result of this is that it adds about 1.5km to a return journey to the town centre compared to a direct route such as if it were possible to cut through the industrial estate via a crossing over Bradford's Brook. The fact that pedestrians walking to the closest current primary school, St John's Primary, on Hithercroft Road will have to walk 1.4km around, is of concern, as OCC believes this will promote the use of a car instead. Primary school aged children will not be able to walk this distance easily and many parents will not have the time to make an 18 minute walk there and back, if they want to get to work on time. This is assuming that they are walking from the site access itself, which the majority will not be and therefore, this will add potentially another 5 minutes onto some peoples' walk. Even with a future closer primary school, there remains an issue with how children would walk to a school given the lack of good pedestrian links."

Overall, there is a concern that this site may lead to a relatively high degree of car dependency amongst residents, also noting that there is no bus stop within easy walking distance (the recent planning application proposed to move the nearest bus stop from a distance of 700m to a distance of 600), although it is fair to assume that any scheme would be mixed use, and there would be good opportunities for residents to walk/cycle to existing employment areas.

Establishing the preferred option

The following is the Town Council's response to the assessment of reasonable alternative growth scenarios –

"In light of the assessment the Town Council considers there to be an over-whelming argument in support of Option 1, namely allocation of Sites E and C only. Both sites are already commitments, in that they already have outline planning permission; however, there is merit to allocation."

Option 2 would involve a higher growth strategy, which is not supported. Whilst the Town Council recognises that calculating need/demand for housing and employment is not an exact science, the requirements for Wallingford established by the emerging Local Plan are evidence-based and suitably robust, and in any case Option 1 leads to the Local Plan housing requirement being significantly exceeded. Additional allocation of Site D is not necessary and would lead to negative impacts that would be a challenge to mitigate, hence allocation is not warranted."

3. 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' themes. The following overall conclusion is reached –

The assessment has concluded that the current version of the Neighbourhood Plan is likely to lead to significant positive effects in relation to the 'population and community' SEA theme. This relates to the focus of the Neighbourhood Plan on the delivery of high-quality housing to meet local needs, protecting and enhancing the provision of community facilities, and supporting the creation of safe, inclusive and attractive environments through sustainable design. The Neighbourhood Plan is also likely to lead to significant positive effects in relation to the 'health and wellbeing' SEA theme, linked to its promotion of improvements to local health services, enhancements to green infrastructure and open space provision, and through the delivery of an appropriate mix of housing types and tenures.

The Neighbourhood Plan will also bring positive effects in relation to the 'transportation' SEA theme. These benefits largely relate to the Neighbourhood Plan's focus on supporting accessibility to services, facilities and public transport networks, whilst also aiming to tackle traffic and congestion issues. This will also lead to indirect positive effects in relation to the 'air quality' SEA theme. Furthermore, the Neighbourhood Plan is also likely to positively tackle the threat of climate change via the implementation of a variety of adaptation and mitigation strategies through new developments, including measures to improve energy efficiency and a commitment to delivering low-carbon homes and through supporting a limitation of greenhouse gas emissions in the Neighbourhood Plan area by encouraging alternative options of transportation.

The Neighbourhood Plan will also initiate a number of beneficial approaches regarding the 'biodiversity' and 'landscape and historic environment' SEA themes, particularly through protecting local character, views and open spaces, supporting local distinctiveness and the quality of the public realm, preserving heritage assets and conserving and enhancing the natural environment through applying the principle of environmental net-gain in the design of new developments. However, given the approaches taken forward through the Neighbourhood Plan will predominantly help to safeguard areas and limit potential effects from new developments rather than secure significant overall enhancements, these impacts are unlikely to comprise significant positive effects.

The Neighbourhood Plan's focus on locating development within the built settlement and encouraging the regeneration and reuse of existing buildings, will lead to positive effects in relation to the 'land, soil and water resources' SEA theme. However, the permanent loss of BMV agricultural land through the allocation at Site E (albeit it is recognised that the site already has planning permission) is a negative impact which cannot be mitigated.

4. Next Steps

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

Plan finalisation

The Environmental Report Update accompanies the submission version of the Wallingford Neighbourhood Plan for consultation. Following submission South Oxfordshire District Council will publish the plan and this Environmental Report Update for consultation.

Subsequently the plan, this Environmental Report and representations received will be provided to an independent Examiner who will conduct an Examination into whether the plan meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the South Oxfordshire District emerging Local Plan and extant Core Strategy.

If the subsequent Independent Examination is favourable, the Wallingford Neighbourhood Plan will be subject to a referendum, organised by South Oxfordshire District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'.

Once made, the Wallingford Neighbourhood Plan will become part of the Development Plan for South Oxfordshire District, covering the defined Neighbourhood Plan Area.

Monitoring

The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in the Environmental Report. This refers to the monitoring of likely significant effects of the WNP to identify any unforeseen effects early and take remedial action as appropriate.

The WNP commits the Town Council to monitoring. In light of the assessment presented above (Chapter 9), it is recommended that monitoring might focus on traffic and air quality within the town centre, as well as the ability of all residents to easily access services and facilities by walking, cycling and public transport.