

Strategic Environmental Assessment (SEA) for the Wallingford Neighbourhood Plan

Environmental Report Update

February 2020

Quality information

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1. Introduction

Background

- 1.1 AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Wallingford Neighbourhood Plan (WNP).
- 1.2 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.
- 1.3 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 WNP is a legal requirement.²

SEA explained

- 1.4 It is a requirement that SEA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which transposed into national law EU Directive 2001/42/EC on SEA.
- 1.5 In-line with the Regulations, a report (known as the **Environmental Report**) must be published for consultation alongside the draft plan that 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'.³ The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.6 More specifically, the Report must answer the following three questions:
 - 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**?

This Environmental Report Update

- 1.7 The Environmental Report for the WNP was published alongside the draft ('pre-submission') version of the plan, under Regulation 14 of the Neighbourhood Planning Regulations (2012) in September 2019. This is an update to the Environmental Report prepared for submission of the plan under Regulation 15 and then publicity under Regulation 16.
- 1.8 This report essentially **answers questions 1, 2 and 3 in turn**, in order to provide the required information.⁴ Each question is answered within a discrete 'part' of the report. Before answering Q1, two initial questions are answered in order to further set the scene.

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

² Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: A) an environmental report; or, B) a statement of reasons why SEA is not required, prepared following a 'screening' process completed in accordance with Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations ('the SEA Regulations'). The WNP was subject to screening in 2018, including through consultation, at which time it was determined that SEA *is* required.

³ Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004.

⁴ See **Appendix I** for further explanation of the regulatory basis for answering certain questions within the Environmental Report, and a 'checklist' explaining more precisely the regulatory basis for presenting certain information.

2. What is the plan seeking to achieve?

Overview

- 2.1 Wallingford was formally designated as a Neighbourhood Plan Area on 1st May 2015. The Plan area is set out in **Figure 2.1** and covers the main town and surrounding land up to the adjacent parishes of Brightwell-cum-Sotwell, Cholsey and Crowmarsh Gifford.
- 2.2 The Wallingford Neighbourhood Plan (WNP) is a community-led planning document, written by a Steering Group of local residents together with members of Wallingford Town Council.
- 2.3 As discussed above, once the WNP has been 'made' (following a successful referendum) it will form part of the South Oxfordshire Development Plan, at which time it will have material weight in the determination of planning applications, i.e. applications relating to changes in land use.

The South Oxfordshire Local Plan

- 2.4 The WNP must be in general conformity with the strategic policies of the Local Plan, supplementing these with locally specific policies as appropriate. As discussed above, there is an adopted Local Plan as well as an emerging Local Plan. The emerging Local Plan is at an advanced stage of preparation, having recently (March 2019) been submitted for examination.
- 2.5 The adopted and emerging plans both identify Wallingford as one of the four towns that comprise the top tier of the settlement hierarchy (the other towns being Didcot, Henley and Thame). It explains that: *"Wallingford is the smallest... town in the district, with a population of around 8,000. Wallingford is an important local service centre for the surrounding villages providing retail, education, health, sports and leisure facilities."*
- 2.6 The following policies of the emerging Local Plan are of central importance:
 - Policy WAL1 (The Strategy for Wallingford) - sets a broad strategy, highlighting the importance of: measures that improve the attraction of Wallingford for visitors with emphasis on the River Thames and the towns' heritage; the market place as a focal hub; accessibility, car parking in the town centre, pedestrian and cycle links; new employment opportunities and improving the existing stock; enhancing the town's natural and historic environment and conserving the town's heritage assets; and addressing air quality issues in the town centre.
 - Policy H3 (Housing in the towns of Henley-on-Thames, Thame and Wallingford) - identifies that the need for 1,070 homes over the plan period (2011 to 2034) has already been met by 'completions' (i.e. homes built since the start of the plan period) and 'commitments' (i.e. homes set to be delivered at sites with planning permission), such that there is no requirement to allocate sites to provide for additional homes through the WNP.
 - Policy EMP1 (The Amount and Distribution of New B-class Employment Land) and Policy EMP7 (New Employment Land at Wallingford) - together require the WNP must allocate 3.1 ha of new employment land suited to the provision of 'B-class employment'.
 - Policy STRAT5 (Residential Densities) - states that proposals for major residential development must a minimum net density of 50 dwellings per hectare (dph), which contrasts to a Core Strategy minimum requirement of 25 dph.

Aims and objectives of the WNP

- 2.7 Five vision statements were developed during earlier stages of plan development:
 - The Neighbourhood Plan aims to protect and enhance the well-established character of Wallingford;
 - Growth in Wallingford to 2034 will be managed carefully, resulting in sustainable development that maintains the town's special character;

- The town centre will continue to serve as the focal point for activities which strengthen the local economy and enhance a community sense of place;
- Opportunities will be created to make Wallingford a hub for people wishing to enjoy the heritage of the town and surrounding countryside and to encourage visitors to support local businesses; and
- Housing for an increasing local population will consist of a mix of types, including starter homes, social and private, family-sized and retirement accommodation. It will be supported by appropriate parking, transport (including public) and links for walking and cycling.

2.8 To accompany the vision statements a series of objectives were also established, structured around the following themes:

- Strategy for Wallingford;
- Employment and Economy;
- Housing, Design, Character Assessment;
- Town Centre, Retail and Tourism;
- Historic Built Environment and Archaeology;
- Movement and Connectivity; and
- Natural Environment;
- Community Facilities and Infrastructure.

2.9 The Neighbourhood Plan outlines the following high-level strategy for Wallingford:

“The Plan will ensure that the growth of Wallingford to 2034 is managed carefully, resulting in sustainable development that maintains the unique Saxon character of our town. It strives to achieve a balance between the need for new development and the ability of existing and planned infrastructure to support that development and will enhance Wallingford’s role as a hub for surrounding villages.”

The town centre with its clear Saxon layout will continue to be the focal point, with a reduced amount of vehicular traffic and priority given to pedestrians, allowing people to relax and enjoy visiting the shops and restaurants. Infrastructure will be in place for people wishing to enjoy the heritage of the town and its surrounding countryside, encouraging visitors to support local businesses. The town will have protected and enhanced its unique archaeology and heritage, including the town’s scheduled monuments, listed buildings and the Wallingford and Winterbrook Conservation Areas.

The network of recreational routes will link the town with the key features of the natural landscapes e.g. Castle Meadows, River Thames, Chilterns and North Wessex Downs AONBs.

Business growth which improves the viability and vitality of the local employment areas will be supported by sustainable transport infrastructure and high-quality facilities. Appropriate housing growth in line with local need will be accommodated. New developments will consist of a mix of types for affordable and market units, including starter, family and retirement homes supported by public transport, walking and cycling infrastructure.

Residents and visitors will be able to access an expanded offer of high-quality social infrastructure, including education, health and leisure facilities. New development will show consideration to the environment through sustainable construction techniques and Wallingford will become more environmentally-friendly with enhanced green spaces and biodiversity.

The WNP sets out a positive vision for the future of Wallingford within the context of its historical character and constraints of landscape setting. It puts sustainable development at the heart of its proposals recognising the importance of social, economic and environmental objectives.”

What is the WNP not seeking to achieve?

2.10 It is important to emphasise that neighbourhood plan-making is a relatively strategic undertaking, in that consideration of some detailed issues naturally falls outside its scope, in the knowledge that such issues can be sufficiently addressed through subsequent planning applications. The strategic nature of the plan is reflected in the scope of the SEA.

3. What is the scope of the SEA?

Introduction

3.1 The aim here is to introduce the reader to the scope of the SEA, i.e. the sustainability issues/objectives that should be a focus of (and provide a methodological framework for) SEA. Further information on the scope of the SEA is presented in **Appendix II**.

Consultation

3.2 The SEA Regulations require that “when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.⁵ As such, these authorities were consulted in 2018.⁶

The SEA framework

3.3 Table 3.1 presents the list of topics and objectives that form the core of the SEA framework.

Table 3.1: 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.

⁵ In line with Article 6(3) of the SEA Directive, these consultation bodies were selected ‘by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes’.

⁶ The SEA Scoping Report is available on the Neighbourhood Plan website.

Part 1:
What has
plan-making / SEA
involved up to this point?

4. Introduction (to Part 1)

Overview

- 4.1 The aim here is to explain how work was undertaken to develop and assess **reasonable alternatives** in late 2018 / early 2019, ahead of finalising the Pre-submission Plan.⁷
- 4.2 More specifically, this part of the report presents information on the consideration given to reasonable alternative approaches to addressing a particular issue that is of central importance to the plan (see Chapter 3), namely the allocation of land for housing and employment.

N.B. henceforth, alternative approaches to the allocation of land, for housing and employment, are referred to simply as '**growth scenarios**'.

Why focus on growth scenarios?

- 4.3 The decision was taken to develop and assess reasonable alternatives in relation to the matter of allocating land for housing and employment ('growth scenarios') on the basis that a strategic choice exists where there is the likelihood of being able to differentiate between the merits of alternative policy approaches in respect of 'significant effects'. National Planning Practice Guidance is clear that SEA should focus on matters likely to give rise to significant effects.
- 4.4 Whilst the WNP is set to establish policy to address a host of other issues/objectives, the initial discussions did not identify any other such issues/objectives where there is a strategic choice and the likelihood of being able to differentiate alternatives in respect of 'significant effects'.

Who's responsibility?

- 4.5 It is important to be clear that -
- **Establishing reasonable alternatives** - is ultimately the responsibility of the plan-maker, however it is naturally the case that AECOM is well placed to advise.
 - **Assessing the reasonable alternatives** - is the responsibility of the SEA consultant, namely AECOM.
 - **Establishing the preferred option** - is the responsibility of the plan-maker.

Structure of this part of the report

- 4.6 This part of the report is structured as follows -

Chapter 5 - explains the process of **establishing** growth scenarios;

Chapter 6 - presents the outcomes of **assessing** growth scenarios;

Chapter 7 - explains reasons for **establishing** the preferred option, in light of the assessment.

⁷ Presenting this information is in accordance with the regulatory requirement to present an assessment of 'reasonable alternatives' and 'an outline of the reasons for selecting the alternatives dealt with' within the Environmental Report.

5. Establishing growth scenarios

Introduction

- 5.1 The aim here is to discuss the key steps taken to inform the establishment of growth scenarios. The aim is to present “an outline of the reasons for selecting the alternatives dealt with”.⁸
- 5.2 Specifically, there is a need to: **1)** explain strategic parameters/options with a bearing on the establishment of growth scenarios; **2)** discuss work completed to examine site options (i.e. sites potentially in contention for allocation); and then **3)** explain how the ‘top down’ and ‘bottom up’ understanding generated was married together in order to arrive at growth scenarios.
- 5.3 Figure 5.1 explains this stepwise process.

Figure 5.1: Establishing the reasonable alternatives



Strategic parameters/options

- 5.4 As discussed, the first step involved giving consideration to strategic considerations with a bearing on the establishment of growth scenarios.
- 5.5 Firstly, there is a need to reiterate the context provided by the emerging South Oxfordshire Local Plan, as already discussed above (Section 2.2), and expand somewhat. The key messages are that:
- There is no requirement to allocate land for housing through the WNP (given completions and commitments since the start of the plan period); indeed, completions and commitments (1,431 homes) significantly exceed the number of new homes required (1,070 homes);⁹ however, there nonetheless remains the option of the WNP allocating land for additional housing, with a view to addressing specific issues / meeting specific objectives.
 - Whilst policies EMP1 and EMP7 of the emerging Local Plan identify a need for the WNP to allocate 3.1 ha of **employment** land, in fact this requirement is met by a committed site (planning application (P14/S2633/FUL, granted June 2015); however, it is again the case that there is the option of the WNP allocating additional employment land nonetheless.
- 5.6 In conclusion, whilst there is no requirement to allocate land to deliver additional housing or employment (i.e. housing or employment over-and-above that which is already completed or committed) there is feasibly the option of allocating land for additional housing and/or employment nonetheless.
- 5.7 Through early discussions it was recognised that the strategic argument for pursuing any such option is not strong, but such options warrant examination nonetheless, for completeness and in the knowledge that certain parties (notably the development industry) may argue the case for Wallingford needing to pursue a high growth strategy.

⁸ Schedule 2(8) of the SEA Regulations.

⁹ See Table 5d of the South Oxfordshire Local Plan (proposed submission version, January 2019)

Site options

5.8 The second step involved identifying and assessing the site options that are potentially in contention for allocation through the WNP. Site options can be thought of as the ‘building blocks’ for establishing growth scenarios.

N.B. it is important to emphasise that this process was led by the Town Council (steering group), with supplementary work undertaken by AECOM as part of the SA commission.

5.9 Figure 5.2 shows site options - i.e. sites that have been put forward - as well as commitments (some of which are now under construction). Taking each site in turn:

- Site A - a large site extending beyond the boundary of the WNP area. The western and eastern parts of the site are in separate land ownership and are being promoted as stand-alone housing-led development schemes (Sites A1 and A2).
- Site B – this was allocated in the Core Strategy and already has outline planning permission for 555 homes (planning application P14/S2860/O) with approval granted on a ‘reserved matters’ application for the first 125 dwellings (P17/S3891/RM). As such, there is no need to allocate the site through the WNP.
- Site C - has full planning permission (P14/S2633/FUL) for delivery of 3.1 ha of employment land, as a westward extension to the Hithercroft Industrial Estate; however, it is considered appropriate to allocate the site through the WNP nonetheless.¹⁰
- Site D – recently refused planning permission (P18/S2506/O) for 170 dwellings and 3.1ha of employment land.
- Site E - has been granted outline planning permission for 502 homes (P16/S4275/O), and hence it is fair to assume that the site is a commitment, for all intents and purposes. As per Site C, it is considered appropriate to allocate the site through the WNP nonetheless (with a view to influencing forthcoming reserved matters application).

Refined shortlist of site options

5.10 The above discussions serves to highlight Sites A1, A2 and D as feasibly in contention for allocation, in addition to Sites C and E; however, the Town Council, working in collaboration with AECOM, determined it appropriate to rule out Sites A1 and A2 from further consideration.

5.11 This is primarily on the basis of concerns raised by Oxfordshire County Council (OCC), who made ‘initial comments’ through a letter to the Neighbourhood Plan Committee in August 2017 (see Appendix III). A primary concern, which serves to differentiate Sites A1 and A2 from Site D, is in respect of safeguarding minerals resources,¹¹ with OCC stating:

“Strong concern over the potential allocation of sites A1 and A2 for residential development is raised due to minerals safeguarding issues... These sites are both fully within a Strategic Resource Area and Mineral Safeguarding Area for sharp sand and gravel in the Oxfordshire Minerals and Waste Local Plan: Part 1 – Core Strategy... polices M3 and M8. In addition, both sites lie within a mineral consultation area under policy M8.”

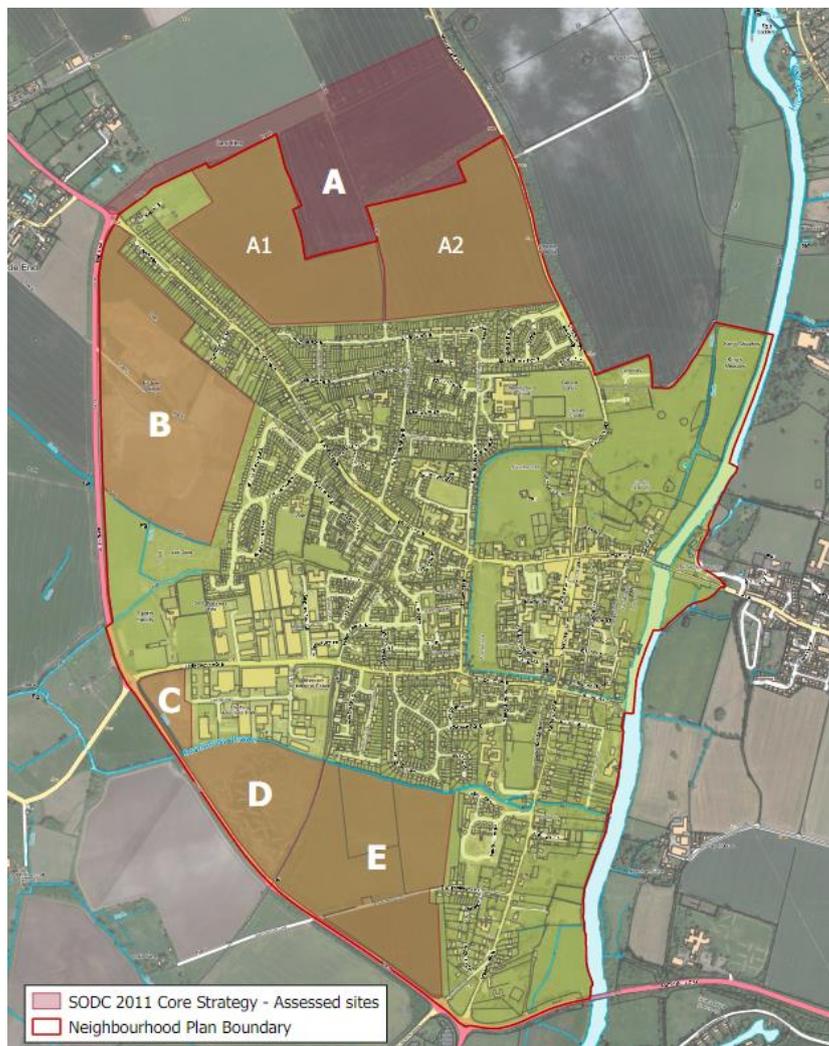
5.12 The OCC concern relates to “sites A1 and A2”; however, it is also fair to assume that the minerals safeguarding issue is also a constraint to allocation of *either* Site A1 or A2.

¹⁰ It can be appropriate to allocate sites with full planning permission on the basis that planning permissions can sometimes lapse and given the need to provide certainty regarding the long term growth strategy.

¹¹ The minerals safeguarding area constrains the northern edge of Wallingford, including all of Site A, as well as land to the west and south of Wallingford beyond the A4130 bypass road.

5.13 The OCC letter also raises concerns regarding “access and the potential additional traffic affecting the AQMA [Air Quality Management Area] in Wallingford ... Therefore any increase in traffic levels as a consequence of residential developments which do not adequately distribute site development traffic, would be detrimental to the AQMA due to additional queue lengths and journey times.” From the Town Council’s perspective, both Sites A1 and A2 do perform poorly in transport terms, given limited potential to walk/cycle to the town centre and access the local bus network, and also given concerns regarding northbound traffic over Shillingford Bridge.

Figure 5.2: Commitments and site options



Growth scenarios

- 5.14 On the basis of the above discussion, there is the option of allocating Sites E and C only, and there are higher growth scenarios involving additional allocation of Site D.
- 5.15 The final question relates to mix of uses at Site D. On balance it was determined appropriate to explore the option of a mixed-use scheme only, noting that the current planning application for the site is for a mixed use scheme. A housing-only scheme would involve housing in proximity to the Industrial Estate to the north, whilst an employment-only scheme might not prove deliverable, and would bring the employment estate as far as the edge of Site E.
- 5.16 The above discussion led to the establishment of two ‘reasonable’ growth scenarios:
- Scenario 1 - allocation of Sites E and C
 - Scenario 2 - additional allocation of Site D for ~170 dwellings and ~3 ha of employment.

6. Assessing the growth scenarios

Introduction

6.1 The aim of this chapter is to present assessment findings in relation to the growth scenarios introduced above.

Assessment findings

6.2 Table 6.1 presents assessment findings in relation to the growth scenarios, where:

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' on the baseline (using red / green)¹² 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).

A note on evidence

6.3 Evidence in respect of Option 2 (Site D) is available in the form of:

- information submitted as part of the recent planning application P18/S2506/O;¹³
- representations received through the recent Regulation 19 consultation, in particular the representation received from the promoters of Site D; and
- the decision-statement in respect of planning application P18/S2506/O, which was published on 9th January 2020, concluding that permission should be refused on five grounds, with the following three key grounds potentially serving to highlight inherent site constraints:
 - *“The proposed development fails to achieve acceptable standards of accessibility and connectivity. It would result in an isolated, unsustainable development which is poorly connected to the town of Wallingford and has inadequate access to facilities and services. It would consequently not reduce the need to travel nor manage patterns of growth to make the fullest possible use of walking and cycling for both residents and employees and would be heavily reliant on the private car.”*
 - *“The application fails to demonstrate that residential development together with employment uses could be adequately accommodated on the site whilst achieving a high-quality place created of good design and amenity for residents, with appropriate landscaping and public amenity space. In addition the application fails to include sufficient information to fully assess the impacts of the proposals on the existing trees on the northern boundary of the site, or the vegetation on the south western boundary for the proposed access roundabout onto the A4130, and therefore fails to demonstrate the protection of important landscape features and provide a development integrated into the landscape.”*
 - *“The submitted application has failed to provide sufficient information to fully assess the impacts of the proposals on the highway network in relation to the junction capacity modelling to ensure that the development will not cause a detrimental impact upon the highway network.”*

6.4 The appraisal presented below was first drafted in August 2019, and only minor updates have been made as part of the process of preparing this Environmental Report Update to respond to the most recent evidence. It is important to note that the appraisal assumes that the site would deliver 170 dwellings and ~3 ha of employment but does not make any firm assumptions regarding the precise nature of the scheme that would deliver these uses.

¹² N.B. Option 1 cannot lead to significant effects (on the baseline) because it is the baseline.

¹³ See <http://www.southoxon.gov.uk/ccm/support/Main.jsp?MODULE=ApplicationDetails&REF=P18/S2506/O#exactline>

Table 6.1: Summary 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.

7. Developing the preferred approach

- 7.1 This section presents the Town Council's reasons for developing the preferred approach in light of alternatives assessment. The Town Council stated (August 2019) -

"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."

- 7.2 At the current time (February 2020) the above reasons hold-true, i.e. this statement has not been updated as part of the process of preparing this Environmental Report Update.

Part 2:
What are the
SEA findings
at this stage?

8. Introduction to Part 2

- 8.1 This part of the report presents an assessment of the submission version of the Wallingford Neighbourhood Plan. It has been significantly updated as part of the process of preparing this Environmental Report Update to respond to changes made to the plan subsequent to consultation on the pre-submission version in 2019.

Methodology

- 8.2 The assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping (see Table 3.1) as a methodological framework.
- 8.3 Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the policies under consideration and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim of striking a balance between comprehensiveness and conciseness). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the draft plan in more general terms.
- 8.4 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e. the potential for the WNP to impact an aspect of the baseline when implemented alongside other plans, programmes and projects. These effect 'characteristics' are described within the assessment as appropriate.

9. Assessment of the plan

Introduction

- 9.1 The assessment is presented below under eight topic headings, one for each of the SEA objectives identified through the scoping exercise as discussed in Chapter 3.

Air Quality

- 9.2 South Oxfordshire District Council is required to monitor air quality across the district in order to fulfil the requirements of Local Air Quality Management (LAQM) as set out in Part IV of the Environment Act (1995). Air Quality Management Areas (AQMA) are declared when there is an exceedance or likely exceedance of an air quality objective. In the local context, the Wallingford AQMA was designated in 2005 for exceedances in the national objectives for nitrogen dioxide (NO₂) and has since been subject to continuous monitoring. Road transport is the significant contributor to air quality issues in the AQMA, with the Neighbourhood Plan recognising that the narrow streets in the centre of the town, induced by Saxon layouts, encourages congestion at points like Wallingford Bridge, High Street, and St. Martins Street. In this respect the policies which set out a range of provisions for encouraging the use of sustainable modes of transport, including walking and cycling and public transport use, will support air quality in the Neighbourhood Plan area through promoting non-car use and encouraging lower emission forms of transport. These policies are discussed in more detail under the 'Transportation' SEA theme.

- 9.3 A limitation of pollutants from transport will also be supported through the spatial strategy promoted through the Neighbourhood Plan, with Policy WS1 'The Local Strategy for Wallingford' requiring that new development does not add to air pollution and congestion issues on local roads by implementing appropriate access arrangements and traffic calming measures through design. Similarly, the provisions of Policy MC1 'Transport Statement and Travel Plan Statement' will ensure that development proposals generating significant amounts of movement include measures to mitigate any potential congestion increases within streets in the town centre.
- 9.4 Additionally, the Neighbourhood Plan has a close focus on green infrastructure enhancements, with Policy EV1 'New Green Spaces and Green Corridors' outlining a range of provisions for enhancing green infrastructure networks and securing environmental enhancements. Specifically, paragraph EV1.1 within the policy states that new developments should connect new public and private amenity green spaces and wildlife corridors with the Wallingford Green Network. The provisions of this policy will therefore serve to limit the worsening of air quality that might otherwise occur as a result of housing growth and associated increases in traffic.
- 9.5 Along with the objectives within the Air Quality Action Plan for Wallingford,¹⁴ the Local Transport Plan for Oxfordshire and emerging Local Plan policies, the WNP policies are supportive of improvements to air quality, against a baseline situation whereby housing growth and associated increases in traffic pose a notable challenge.

Biodiversity

- 9.6 The Neighbourhood Plan area is relatively unconstrained in biodiversity terms and does not overlap with the boundaries of any European or nationally designated sites. Additionally, Wallingford is not located within a Site of Special Scientific Interest Impact Risk Zone for the type of development proposed in the Neighbourhood Plan area (i.e. residential, rural residential, or rural non-residential). However, whilst no significant negative effects on biodiversity can be readily identified, there will be a need for potential effects on biodiversity linked to the proposed allocations in the Neighbourhood Plan to be avoided and mitigated. Therefore, the Neighbourhood Plan sets out provisions which will 1) help limit potential effects from new development on features and areas of biodiversity interest in the Neighbourhood Plan area and 2) support the resilience of ecological networks.
- 9.7 For example, Policy EV1 'New Green Spaces and Green Corridors' seeks to improve and enhance biodiversity within the Neighbourhood Plan area, including (amongst other criteria):
- Creating new permeable green corridors that allow wildlife to move from one area of habitat to another (paragraph EV1.1(a1)); and
 - Creating new habitats e.g. ponds, urban meadows and hedgerows and enhance existing biodiversity assets (paragraph EV1.1(a2)); and
 - Ensuring new development provides a measurable net gain for biodiversity within the development area (paragraph EV1.1(a3)).
- 9.8 Similarly, paragraphs WS1.1(d) and WS1.1(e) within Policy WS1 'The Local Strategy for Wallingford' outline provisions for improving, enhancing and extending biodiversity within the Wallingford Green Network. This is further supported through the provisions of Policy EV2 'Protect Existing Amenity Spaces and Wallingford Green Network' which encourages new development proposals to create new habitats, e.g. ponds, urban meadows and hedgerows, through design (paragraph EV2.1(b₂)). Policy HD5 'Avoidance of Light Pollution' also states that new development proposals must be designed to minimise the detrimental impact of glare and light spill in sensitive locations (paragraph HD5.2). This will support the resilience of nocturnal species within the Neighbourhood Plan area.

¹⁴ South Oxfordshire District Council (2014): 'Air Quality Action Plan', [online] available to download via: <<https://oxfordshire.air-quality.info/local-air-quality-management/south-oxfordshire>> last accessed [08/02/19]

- 9.9 Whilst there are no European designated sites for nature conservation within the Neighbourhood Plan area, the Little Wittenham Special Area of Conservation (SAC) is located approximately 2.5 km to the north west (as its nearest point). Completed in December 2018 for the submission version of the emerging SODC Local Plan, a Habitats Regulation Assessment¹⁵ (HRA) was undertaken in order to ascertain the potential for adverse effects on the integrity of European sites, either alone or in combination with other plans or projects. Following an initial screening exercise, the HRA identified a potential for recreational effects to the Little Wittenham SAC from certain policies, with the following policies directly concerning Wallingford:
- Policy STRAT2: The Need for New Development in South Oxfordshire; and
 - Policy H3: Housing in the towns of Henley-on-Thames, Thame and Wallingford.
- 9.10 Subsequent to the screening exercise, an appropriate assessment was undertaken to further consider the potential effects, concluding the following: *“The increase in visitors at Little Wittenham SAC as a result of the Emerging Local Plan would be within that predicted and planned for by the Earth Trust, which manages the site. Adverse effects on integrity are unlikely to occur due to...the limited sensitivity of the site’s qualifying feature, being its great crested newt population, and suitable existing and planned future management”*. Given the Neighbourhood Plan will be in conformity with the quantum and location of development in the Local Plan, no additional effects are therefore anticipated on European designated biodiversity sites.
- 9.11 Published in July 2018, paragraph 170 (d) within the revised NPPF¹⁶ states that planning policies and decisions should contribute to and enhance the natural and local environment by *‘minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks’*, with paragraph 32 outlining that spatial development strategies should demonstrate how opportunities for net gains have been addressed. An environmental net gain principle for development is also embedded within the goals and policies of the UK Government’s 25-Year Environment Plan¹⁷, which was published in January 2018. In this regard, paragraph EV1.1(a3) seeks to ensure that new development provides a measurable net gain for biodiversity within the development area using the most up-to-date measure for Oxfordshire.
- 9.12 Ecological networks within the Neighbourhood Plan area are further supported by policies which safeguard open spaces. Policy CF4 ‘Wallingford’s Riverside’ seeks to preserve the riverside meadows, parks and pools surrounding Wallingford Bridge. Specifically, paragraphs CF4.1 and CF4.2 within the policy states that proposals that harm the ecology or natural landscape character of these areas will not be supported. Additionally, Policy EV1 aims to protect the ecological and natural capital value of the River Thames (paragraph EV1.1(c)) and explore opportunities for positive management of wetland habitats such as linking and expanding small isolated wet woodlands within the Thames Wallingford to Goring Conservation Target Area (paragraph EV1.1(e)). Policy CF3 designates the open areas at Wilding Road, Radnor Road and the Paddock’s Playing Field as ‘Local Green Spaces’, shown on a proposals map which accompanies the Neighbourhood Plan. Notably, the protection of these spaces will bolster locally important areas of Biodiversity Action Plan (BAP) priority habitats in Wallingford against potential threats from development, by maintaining the availability of connectivity corridors and stepping stones between them.

¹⁵ South Oxfordshire District Council (2018): ‘Habitats Regulation Assessment’ [online] available to download via: <<http://www.southoxon.gov.uk/services-and-advice/planning-and-building/planning-policy/local-plan-2034>> last accessed [08/02/19]

¹⁶ MHCLG (2018): ‘Revised National Planning Policy Framework’, [online] available to access via: <<https://www.gov.uk/government/collections/revised-national-planning-policy-framework>> last accessed [08/02/19]

¹⁷ DEFRA (2018): ‘A Green Future: Our 25 Year Plan to Improve the Environment’, [online] available to access via: <<https://www.gov.uk/government/publications/25-year-environment-plan>> last accessed [08/02/19]

Climate Change

- 9.13 In terms of climate change mitigation, road transport is an increasingly significant contributor to greenhouse gas emissions in the Neighbourhood Plan area. Based on the 2011 census data, the most popular method of travelling to work in the Neighbourhood Plan area is via driving, with over 81% of residents having access to at least one car or van. Supporting modal shift, Policy MC2 'Access to Public Transport', Policy MC3 'Promotion of Cycling' and Policy MC4 'Safe Travel' will support a limitation of greenhouse gas emissions in Wallingford by encouraging alternative options of transportation, particularly for undertaking day-to-day activities. For residential development proposals which incorporate provisions for off-street parking, Policy MC7 'Provision of Electric Vehicle Charging Points' confirm that such proposals will be supported on the basis that they include at least one public charge point for every ten parking spaces, and at least one EV charge point for every five bicycle spaces. Policy MC7 also outlines additional requirements in this regard for new non-residential buildings and for public car parks.
- 9.14 With relation to the design of new developments, paragraph HD2.1 within Policy HD2 'Sustainable Design' suggests that new developments should be built to achieve resilience to the effects of climate change, with support given to proposals which demonstrate that they achieve zero-carbon or negative carbon. Similarly, paragraph HD5.1 within Policy HD5 'Avoidance of Light Pollution' outlines support for development proposals which mitigate the impacts of light pollution (for example using low-level lighting). The provisions of this policy will positively encourage energy efficiency through design, therefore positively contributing to climate change mitigation efforts within the district.
- 9.15 In terms of climate change adaptation, the provisions of the National Planning Policy Framework will help address potential flood risk issues in the Neighbourhood Plan area. It is important to note that the proposed allocation at Site E within the Neighbourhood Plan through Policy WS2 'The Land Allocation for Housing in Wallingford' is located within Flood Zone 1, and therefore has a low flood risk potential. Additionally, Policy HD3 'Affordable Housing, Housing Mix' is supportive of developments which provides new, and where appropriate, protects existing public amenity green space (paragraph HD3.2(c)). Along with the provisions of Policy EV1 'New Green Spaces and Green Corridors' and Policy CF3 'Local Green Spaces' this policy supports the protection of natural carbon sequesters located within the landscape (i.e. trees and hedgerows) and will also positively respond to the potential effects of climate change (particularly from extreme weather events) through providing summer shading and reducing surface water run-off.

Landscape and historic environment

- 9.16 Although the Neighbourhood Plan area does not overlap with the boundaries of a nationally designated landscape, Wallingford is surrounded by, and in places abuts, both the North Wessex Downs Areas of Outstanding Natural Beauty (AONB) to the north, west and south, along with the Chilterns AONB to the east. Therefore, several policies within the Neighbourhood Plan have a strong focus on protecting the sense of place and special qualities of Wallingford which contribute to its character, respecting its setting within proximity to these protected landscapes. For example, paragraph HD1.1 in Policy HD1 'Design' states that new development should respect and enhance local character and respond positively to local surroundings. Similarly, Policy HD3 'Affordable Housing, Housing Mix' is supportive of developments which foster a sense of place through design and layout, reflecting the character of Wallingford and respecting the design and layout of existing buildings (paragraph HD3.2(a) and paragraph HD3.2(b)). Likewise, Policy WS4 'Development within the Built-Up Area' supports proposals for development in these locations under the provision that they would not cause unacceptable harm to the landscape setting of the town and the historic character of Wallingford (paragraph WS4.1(b) and paragraph WS4.1(d)). This includes the setting of the town and AONBs and avoiding damage to the burgage plots, designated and non-designated heritage assets.

- 9.17 The proposed allocations in the Neighbourhood Plan area are located adjacent to the existing built-up areas of Wallingford. This will support a limitation of effects on the open countryside. This is supported by the provisions of Policy EV1 'New Green Spaces and Green Corridors' and Policy CF3 'Local Green Spaces' which aim to safeguard and enhance open spaces within Wallingford. Similarly, Policy WS3 'Housing Density' states that densities on new development sites of more than 10 homes should take account of local circumstances, particularly the protection of the local landscape character and historic environment. Therefore, these policies will ensure that new developments within the Neighbourhood Plan area are sensitive to their setting and safeguard important features from high levels of inappropriate development.
- 9.18 The Neighbourhood Plan area has a rich historic environment, recognised through the diversity of features and areas that are nationally and locally valued for their cultural heritage interest, including four scheduled monuments (comprising Wallingford Castle, Wallingford Bridge and the ramparts and open spaces forming the Bull Croft and Kinecroft), four Grade I, nine Grade II* and 128 Grade II listed buildings, the Wallingford Conservation Area, Winterbrook Conservation Area, and a total of 295 entries on the Historic Environmental Record for Oxfordshire. This is reflected by Neighbourhood Plan policies which have a strong focus on conserving and enhancing the significance of buildings and structures of architectural or historic interest, both designated and non-designated, and their settings.
- 9.19 For example, Policy HA1 'The Historic Environment' states that the town's historic environment shall be protected, conserved and enhanced, including historic buildings and structures, conservation areas, landscapes and archaeology (paragraph HA1.1). The policy goes on to outline several expectations for landowners, developers and other relevant stakeholders to ensure that development proposals respect the character and significance of assets. This includes (amongst other considerations):
- Ensuring that vacant historic buildings are appropriately re-used to prevent deterioration of condition (paragraph HA1.2(a));
 - Ensuring that alterations (internal or external to the fabric of the building), are balanced alongside the need to retain the integrity of the historic environment and to respect the character and significance of the asset (paragraph HA1.2(b));
 - Ensuring that relevant stakeholders are involved in pre-application work (paragraph HA1.2(c)); and
 - Making provision for the realisation of the potential of the heritage assets through their enhancement, interpretation and education (paragraph HA1.2(d))
- 9.20 This is reaffirmed through the provisions of paragraph WS1.1(c) within Policy WS1 'The Local Strategy for Wallingford' which requires development proposals to recognise and address the declining condition of heritage assets, realising their potential as positive assets within the town. Furthermore, paragraph HD1.2 in Policy HD1 affirms that new development should have regard to the detailed information in the Wallingford Character Assessment, Wallingford Conservation Area Appraisal and Winterbrook Character Assessment.
- 9.21 Likewise, paragraphs HA2.2(a-d) in Policy HA2 'Effects of Development on Historic and Heritage Assets' outlines a requirement for development proposals to demonstrate positive impacts to Wallingford's designated heritage assets (including consideration of non-designated assets). Specifically, the provisions of Policy HA2 will expect proposals to conserve and enhance the historic significance of these assets, along with contributing to local distinctiveness, character and conservation. The policy also affirms that any potential impacts should be mitigated appropriately to reflect their significance, including for the preservation of important features where the loss would not be outweighed by the public benefits of the development. This is also demonstrated through paragraph WS2.2(h) within Policy WS2 'The Land Allocation for Housing at Wallingford' which states that the areas of archaeological significance (which includes the two ring ditch monuments identified in the south eastern section of Site E) are retained as open space with sensitive landscaping. The purpose of these mitigation measures is to ensure that the remains are preserved in-situ and interpreted, to aid understanding of the area's heritage.

- 9.22 One of the key aspirations of the community will be to ensure that Wallingford's historic environment is protected and maintained for future generations to enjoy (see paragraph 10.2 of the Neighbourhood Plan). This will help to capture the full list of assets in the context of the town's important history and character, and positively help to encourage enjoyment and conservation of the town's specific heritage features; as noted by Historic England as an essential objective for Wallingford. Similarly, regarding the setting of heritage assets in the Neighbourhood Plan area, Policy HA3 'Views and Vistas' states that development proposals shall conserve and enhance the views within the Wallingford Conservation Area as indicated within its character appraisal and have appropriate regard to Wallingford's nationally important Saxon and later layout. This is supported through the provisions of Policy HD5 'Avoidance of Light Pollution' which states that new development proposals must be designed to minimise the detrimental impact of glare and light spill in sensitive locations (paragraph HD5.2). Furthermore, the provisions of Policy HA4 'Enabling development supporting Heritage at Risk' indicate that in certain circumstances contributions from development proposals will be sought for the repair and sustainable maintenance of assets within the Neighbourhood Plan area which are recorded as being 'at risk' by Historic England. This is reaffirmed through the provisions of Policy HA2 (paragraph HA2.2(e)); important in the local context, as three of the four scheduled monuments within the Neighbourhood Plan area are classified as being 'at risk' on Historic England's Heritage at Risk Register. Therefore, this policy demonstrates a commitment through the Neighbourhood Plan to target those heritage assets that are most at risk of decay, neglect and other threats.
- 9.23 Overall, the policies within the Neighbourhood Plan take a proactive approach in conserving and enhancing the distinctive character and heritage interests of Wallingford. It is important to recognise that along with policies within the emerging Local Plan, the objectives within the management plans for the North Wessex Downs AONB and the Chilterns AONB, and the issues and positive management strategies located within the appraisals for the Wallingford Conservation Area and the Winterbrook Conservation Area provide additional layers of protection and opportunities in relation to the historic environment and landscape character.

Land, soil and water resources

- 9.24 The Neighbourhood Plan acknowledges that market town of Wallingford is bounded by the River Thames to the east and to the south and west by a bypass, with land to the north safeguarded by the County Council in case it is required for mineral extraction. In this regard, the allocations proposed at Site C and Site E are in compliance with OCC Mineral's and Waste Local Plan.
- 9.25 In terms of the location of the best and most versatile (BMV) agricultural land, MAGIC's agricultural land classification (ALC) mapping layer¹⁸ confirms that the existing commitment and proposed allocation at Site E (as per the provisions of Policy WS2 'Land Allocation for Housing in Wallingford') is underlain by Grade 2 agricultural land. Therefore, the proposed allocation at this location will result in the permanent loss of BMV agricultural land, albeit the site already has planning permission. However, Policy WS1 'The Local Strategy for Wallingford' confirms that all new housing within the Neighbourhood Plan area (moving forward) will be considered within the built settlement, which will safeguard agricultural land against high levels of inappropriate development (paragraph WS1.1(a) and paragraph WS1.1(b)). Policy WS4 'Development within the Built-Up Area' also confirms that proposals for the redevelopment or reuse of buildings in these locations, minimising levels of inappropriate development in the surrounding landscape. This will positively support the most efficient use of land within Wallingford, enabling the remediation of potentially contaminated land.

¹⁸ MAGIC (2019): 'Interactive Map – Post 1988 Agricultural Land Classification (England)', [online] available to view via: <<https://magic.defra.gov.uk/MagicMap.aspx>> last accessed [08/02/19]

- 9.26 Regarding the water resources in the Neighbourhood Plan area, the Environment Agency's (EA) Catchment Data Explorer¹⁹ confirms that the 'Thames Wallingford to Caversham' watercourse navigates alongside the eastern boundary of the Neighbourhood Plan area. Based on the most recently completed water quality assessments undertaken in 2016, the watercourse received a 'moderate quality' status. Policy EV1 'New Green Spaces and Green Corridors' outlines an expectation for new developments to incorporate new habitats through design. This will indirectly and positively contribute to the Water Framework Directive's objective of achieving 'good status' for as many watercourses as possible by 2027 through reducing the potential for surface water run-off by increasing natural infiltrators of precipitation and encouraging the application of permeable areas of hard-standing within the Neighbourhood Plan area.
- 9.27 Policy EV2 'Protect Existing Amenity Spaces and Wallingford Green Network' sets out a range of provisions for enhancing green infrastructure networks and securing environmental enhancements (i.e. incorporating existing natural features such as trees, hedgerows and ponds within new development areas). Green infrastructure enhancements are also supported by Policy CF3 which designates three Local Green Spaces in the Neighbourhood Plan area. These policies will therefore promote the ability of natural processes to safeguard and enhance soil and water resources in the Neighbourhood Plan area.

Population and community

- 9.28 The Neighbourhood Plan supports the allocations for new development at Site C and Site E, aligning to the provisions of the emerging Local Plan and meeting the housing requirements for Wallingford. Policy WS1 'The Local Strategy for Wallingford' also confirms that proposals for future housing developments within the Neighbourhood Plan area will only be considered within the built settlement. This will protect the open countryside from high levels of inappropriate development and focus development within locations likely to be within proximity to local services and facilities in Wallingford. This will be strengthened through the provisions of Policy WS4 'Development Within the Built-up Area'.
- 9.29 Policy HD3 'Affordable Housing, Housing Mix' states that housing development which includes a diverse mix of dwellings in terms of type and tenure will be supported, providing that the overall arrangement avoids segregation by layout (paragraph HD3.2). This policy will ensure that development reflects and responds to the existing and future housing needs of the Neighbourhood Plan area. Policy HD4 'Self-Build' also outlines support for proposals for ten or more dwellings which include plots available for this purpose, with paragraph HD3.2(e) in Policy HD3 confirming support for development proposals which incorporate appropriate levels of affordable housing which are spread throughout the development, and not concentrated in clusters. The provision of these policies will therefore support the creation of mixed, balanced and inclusive communities, aligning with both national and local policy objectives.
- 9.30 The Neighbourhood Plan also contains several policies which will positively support the quality of life of residents and the satisfaction of residents in the Neighbourhood Plan area as a place to live, with a goal of enhancing community vitality. For example, maintaining and enhancing the diversity of local community infrastructure is essential for both a growing and ageing population. Therefore, Policy CF1 'Protecting Existing Facilities' aims to safeguard existing essential community or leisure services and facilities from change-of-use unless (amongst other considerations) suitable alternative provisions can be made (paragraph CF1.1(a)). Policy CF5 'Local Amenity Provision' states that developers of new housing developments of at least 50 houses will be encouraged to provide local business premises to serve the needs of the residents of the development (such as convenience shops and pubs). Furthermore, policies which support improvements to green infrastructure and positively contribute to the sense of place and identity of Wallingford will also help to enhance community vitality. These policies are discussed under the 'biodiversity' and 'landscape and historic environment' appraisal summaries.

¹⁹ Environment Agency (2019): 'Catchment Data Explorer – Thames Wallingford to Caversham Overview', [online] available to access via: <<http://environment.data.gov.uk/catchment-planning/WaterBody/GB106039030331>> last accessed [08/02/19]

9.31 Regarding the economic vitality of the Neighbourhood Plan area, Policy EE1 'Allocation of Employment Land at Site C' states that at least 3.1 ha of new 'B' class employment land will be allocated on land to the west of the Hithercroft Industrial Estate (referred to as Site C, the Rubies site), aligning to Local Plan provisions. Policy EE2 'Safeguard Existing Local Employment Sites for Class 'B' uses' safeguards Site C for these purposes. Policy EE3 'Resist Loss of Employment Space and Uses' confirms that proposals which would result in the loss of employment spaces will be supported where the applicant can demonstrate, amongst other considerations, that any employment use is no longer viable (paragraph EE3.1(a)) and that there is no longer market interest in the site for these purposes (paragraph EE3.1(b)). The provisions of Policy TC1 'Primary Shopping Area', Policy TC2 'New Uses for Buildings within the Primary Shopping Area' and Policy TC3 'Regal Site' will positively enhance the vibrancy and vitality of the town centre, maintaining its function as a community hub for local services and facilities. Furthermore, the value of the tourism economy in Wallingford is recognised through the provisions of Policy TC4 'Improve the Visitor Economy', Policy TC6 'Provision of Coach Parking' and Policy TC7 'Preservation of Visitor Accommodation' which seek to improve the experience and opportunities for those visiting the town.

Health and wellbeing

9.32 Reflecting the results of the Joint Strategic Needs Assessment (JSNA), the main policies within Oxfordshire's Joint Health and Wellbeing Strategy (JHWS)²⁰ (2015-2019) link to promoting healthy lifestyles, improving quality of life, preventing early deaths and diseases, ensuring that children start well in life, narrowing the gap for disadvantaged and vulnerable groups, and tackling the broader determinants of health through providing better services and housing. In this context, the policies contained within the Neighbourhood Plan will bring a range of benefits for the health and wellbeing of residents in Wallingford, as well as addressing some of the key outcomes within the JHWS.

9.33 For example, the quality and availability of housing is an important contributor to health and wellbeing. As discussed under the 'population and community' SEA theme, new developments will be required to provide an appropriate mix of housing types, density, sizes and tenures through Policy HD3 'Affordable Housing, Housing Mix' and Policy WS3 'Housing Density' to meet the identified needs arising locally. Along with the policies which aspire for sustainable design (Policy HD1 and HD2), it is expected that the Neighbourhood Plan will facilitate high quality housing which helps meet the needs of local people.

9.34 The Neighbourhood Plan acknowledges that the River Thames is an important asset to Wallingford, not only terms of its natural and historic value, but also in terms of both recreation and tourism. In this context, Policy CF4 'Wallingford's Riverside' seek to preserve these areas for ecological, recreation, leisure and tourism purposes, which will therefore positively safeguard assets which positively contribute to the identity of the Neighbourhood Plan area. Supporting the quality of life of residents, Policy WS4 'Development Within the Built-Up Area' seeks to ensure that new development areas do not lead to a poor quality environment for those who work or live in the area, including through noise and disturbance.

9.35 The Neighbourhood Plan states that Wallingford is a hub for health and social care, because the existing Wallingford Medical Practice and Wallingford Community Hospital are used by residents from surrounding villages as well as Wallingford residents. Policy CF6 'Health and Wellbeing Service Provision' recognises that healthcare provision in Wallingford must expand alongside the growth in population (paragraph CF6.1). Therefore, the policy states that financial contributions will be required from housing developers to fund additional and enhance existing facilities. Similarly, the provisions of Policy CF7 'Education Provision' seeks to mitigate the impact of development on educational provision for all ages and abilities, proportional to the increase in population generated by the development.

²⁰ Oxfordshire County Council (2015): 'Joint Health and Wellbeing Strategy 2015-2019', [online] available to download via: <<https://www.oxfordshire.gov.uk/residents/social-and-health-care/health-and-wellbeing-board/health-improvement>> last accessed [08/02/19]

9.36 The benefits to emotional wellbeing and mental health resulting from close contact with the natural environment are well-documented, and there is a strong drive to maintain and improve green infrastructure and open spaces within the Neighbourhood Plan area. Policy EV1 'New Green Spaces and Green Corridors' and Policy EV2 'Protect Existing Amenity Spaces and Wallingford Green Network' encourage proposals which incorporate new natural areas and improve green corridors and networks (including for recreational uses). Likewise, Policy CF3 'Local Green Spaces' aim to safeguard three areas which provide recreational benefits to the local community, with new development at these locations only permitted in very special circumstances. Furthermore, Policy CF2 'Support for New Formal and Informal Sport and Community Facilities' states that any future development proposals of this type will be supported where they are located within or adjacent to the town (paragraph CF2.1(a)), would meet a locally identifiable need (paragraph CF2.1(b)) and are accessible for all members of the community (paragraph CF2.1(c)). Along with policies which encourage walking and cycling around the Neighbourhood Plan area, the provisions of these policies will positively support and facilitate active lifestyles for Wallingford residents.

Transportation

9.37 Each Local Transport Authority in England and Wales has a statutory duty to produce, adopt and regularly review their Local Transport Plan (LTP) through the Local Transport Act 2000, as amended by the Local Transport Act 2008. Developed in 2015, 'Connecting Oxfordshire' is the fourth Local Transport Plan²¹ (LTP4) for the county, covering the period up until the year 2031 and seeking to ensure that the transport systems are fit to support growths in both the local population and economy. With reference to the Neighbourhood Plan, Policy WS1 'The Local Strategy for Wallingford' and Policy WS4 'Development Within the Built-up Area' are supportive of locating new development within or adjacent to the existing settlement. This will ensure that housing is situated in sustainable locations to facilitate good accessibility and connectivity to local services and facilities.

9.38 Based on the 2011 census data, the most popular method of travelling to work in the Neighbourhood Plan area is via driving, with over 81% of residents having access to at least one car or van. In this respect there is a need to encourage modal shift from the reliance on privately owned vehicles towards sustainable modes of transport, whilst also ensuring that new development proposals support access to local services and facilities. In this respect, Policy MC2 'Access to Public Transport', Policy MC3 'Promotion of Cycling' and Policy MC4 'Safe Travel' are supportive of proposals which provide a choice of safe routes for all users undertaking day-to-day journeys around Wallingford. In this respect, the provisions of the policy will seek to (amongst other factors):

- Be designed to facilitate access to high quality public transport routes (paragraph MC4.1(d));
- Provide for appropriate public transport infrastructure (paragraph MC4.1(e)); and
- Make adequate provision for those with impaired mobility and parking for disabled people (paragraph MC4.1(h)).

9.39 Additionally, land south of Hithercroft along with an additional strip of land adjacent to the railway line will be safeguarded as a sustainable transport corridor for use by pedestrians and cyclists through Policy MC6 'Cholsey and Wallingford Railway Corridor'. Likewise, this corridor shall be used to enable the provision of commuter train services from Wallingford Station, with no built development taking place which would preclude its use for transport and movement.

²¹ Oxfordshire County Council (2015): 'Connecting Oxfordshire LTP4: Policy and Overall Strategy', [online] available to access via: <<https://www.oxfordshire.gov.uk/residents/roads-and-transport/connecting-oxfordshire/policy-and-overall-strategy>> last accessed [08/02/19]

9.40 Several policies in the Neighbourhood Plan aim to tackle traffic and congestion issues within Wallingford. For example, Policy MC1 'Transport Statement and Travel Plan Statement' outlines a requirement for development proposals over certain thresholds to be accompanied by documents containing measures to avoid any increases in congestion in the streets in the town centre. Likewise, Policy MC4 'Safe Travel' confirms that new residential development proposals for all types of development will be supported where they minimise traffic hazards (paragraph MC4.1(f)) and provide safe pedestrian and cycle links (paragraph MC4.1(a) and paragraph MC4.1(b)). Policy TC5 'Public and Private Car Parks' states that within the town centre, loss of public or private car parks will be resisted unless the proposal can demonstrate that at least the same level of spaces will be provided within the town centre. Likewise, Policy MC5 'Vehicle Parking' will ensure that proposals for new residential developments meet the requirements in Oxfordshire County Council's residential parking provision policy.

Conclusions at this current stage

- 9.41 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.
- 9.42 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.
- 9.43 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.
- 9.44 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.

Part 3:
What are
the next steps?

10. Introduction to Part 3

10.1 This part of the report explains next steps that will be taken as part of plan-making and SEA.

11. Plan finalisation

- 11.1 This 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.
- 11.2 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.
- 11.3 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'.
- 11.4 Once made, the Wallingford Neighbourhood Plan will become part of the Development Plan for South Oxfordshire District, covering the defined Neighbourhood Plan Area.

12. Monitoring

- 12.1 The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the Wallingford Neighbourhood Plan to identify any unforeseen effects early and take remedial action as appropriate.
- 12.2 It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by South Oxfordshire District Council as part of the process of preparing its Authority Monitoring Report (AMR).
- 12.3 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.

Appendix I: Regulatory requirements

As discussed in Chapter 1 above, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 (the Regulations) explains the information that must be contained in the Environmental Report; however, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2 requirements, whilst Table B explains this interpretation.

Table A: Questions answered by this Environmental Report Update, in-line with an interpretation of regulatory requirements

		Questions answered	As per regulations... the Environmental Report must include...
Introduction		What's the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the SEA scope?	What's the sustainability 'context'?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What's the sustainability 'baseline'?	<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SEA involved up to this point?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan 	
Part 2	What are the SEA findings at this current stage?	<ul style="list-style-type: none"> The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan 	
Part 3	What happens next?	<ul style="list-style-type: none"> A description of the monitoring measures envisaged 	

Table B: Questions answered by this Environmental Report Update, in-line with regulatory requirements

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level	
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal	i.e. answer - <i>What are the key issues & objectives?</i>
(h) 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	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

Whilst Tables A and B signpost broadly how/where this report meets regulatory requirements, as a supplement, Table C presents a discussion of more precisely how/where regulatory requirements are met.

Table C: 'Checklist' of how and where (within this report) requirements are / are being met.

Regulatory requirement	Discussion of how requirement is met
Schedule 2 of the regulations lists the information to be provided within the Environmental Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 2 ('What's the plan seeking to achieve') presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters have been considered in detail through dedicated scoping work, which has involved dedicated consultation on a Scoping Report. The 'SEA framework' – the outcome of scoping - is presented within Chapter 3 ('What's the SEA scope?'). Also, more detailed messages - i.e. messages established through context and baseline review - are presented within Appendix II.
c) The environmental characteristics of areas likely to be significantly affected;	
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	<p>The SEA framework is presented within Chapter 3 ('What's the scope of the SEA'). Also, messages from the context review are presented within Appendix II.</p> <p>With regards to explaining "<i>how... considerations have been taken into account</i>", Chapter 7 explains the Parish Council's 'reasons for supporting the preferred approach', i.e. explains how/why the preferred approach is justified in-light of alternatives assessment (and other factors).</p>

Regulatory requirement	Discussion of how requirement is met
<p>f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);</p>	<ul style="list-style-type: none"> Chapter 6 presents alternatives assessment findings (in relation to housing growth, which is a 'stand-out' plan policy area). Chapters 9 presents an assessment of the draft plan. <p>With regards to assessment methodology, Chapter 8 explains the role of the SEA framework/scope, and the need to consider the potential for various effect characteristics/ dimensions, e.g. timescale.</p>
<p>g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;</p>	<p>The assessment highlights certain tensions between competing objectives, which might potentially be actioned by the Council, when finalising the plan. Also, a number of specific recommendations are made.</p>
<p>h) 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;</p>	<p>Chapters 4 and 5 deal with 'Reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on particular issues and options.</p> <p>Also, Chapter 7 explains the Parish Council's 'reasons for selecting the preferred option' (in-light of alternatives assessment).</p>
<p>i) description of measures envisaged concerning monitoring in accordance with Art. 10;</p>	<p>Chapter 12 presents measures envisaged concerning monitoring.</p>
<p>j) a non-technical summary of the information provided under the above headings</p>	<p>The NTS is a separate document.</p>
<p>The Environmental Report must be published alongside the draft plan, in-line with the following regulations</p>	
<p>authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)</p>	<p>Assessment findings presented within the Environmental Report (August 2019) and consultation responses received, informed preparation of the submission version of the plan and preparation of this Environmental Report Update.</p> <p>At the current time, this Environmental Report Update is published alongside the submission version of the plan, with a view to informing the consultation and subsequent plan finalisation.</p>

Regulatory requirement	Discussion of how requirement is met
<p>The Environmental Report must be taken into account, alongside consultation responses, when finalising the plan.</p>	
<p>The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.</p>	<p>Assessment findings presented within the Environmental Report (August 2019) and consultation responses received, informed preparation of the submission version of the plan and preparation of this Environmental Report Update.</p> <p>At the current time, this Environmental Report Update is published alongside the submission version of the plan, with a view to informing the consultation and subsequent plan finalisation.</p>

Appendix II – The SEA Scope

Introduction

The aim of this appendix is to supplement Table 3.1 by presenting key issues under each of the SEA topic headings, and also to present the SEA assessment framework in fully, i.e. with assessment questions shown alongside the headline SEA objectives.

Air quality

- An Air Quality Management Area has been declared within Wallingford due to exceedances of NO₂ as highlighted in the 2016 Local Air Quality Management (LAQM) Annual Status Report.
- Housing and employment growth have the potential to increase emissions and reduce air quality in the area.

Biodiversity and geodiversity

- There are no European or nationally designated sites for biodiversity and/or geodiversity located within or adjacent to the Neighbourhood Plan area.
- There are a network of Biodiversity Action Plan (BAP) priority habitats present in the Neighbourhood Plan area including patches of Lowland calcareous grassland, Coastal and floodplain grazing marsh, and deciduous woodland.

Climate change

- Any increases in the built footprint of the Neighbourhood Plan area (associated with the delivery of new housing and employment land) has the potential to increase overall greenhouse gas emissions in Wallingford.
- The total CO₂ emissions per capita within South Oxfordshire District are broadly higher than the regional and national totals.
- There are areas of land adjacent to the River Thames which are located within Flood Risk Zone 3, and as such, have a >1% chance of being flooded each year.
- Within the Neighbourhood Plan area, there are corridors of land at low-medium risk of surface water and sewer flooding.
- Wallingford is a water stressed area, receiving an average of less than 600mm per year. The area has the potential to become more prone to drought with the effects of climate change.
- The Wallingford Neighbourhood Plan should seek to increase the resilience of the Neighbourhood Plan area to the effects of climate change by supporting and encouraging adaptation strategies.

Landscape and historic environment

- The northern and eastern boundaries of the Neighbourhood Plan area are directly adjacent to the North Wessex Downs Area of Outstanding Natural Beauty (AONB) and Chilterns AONB.
- The Neighbourhood Plan area is located within the Upper Thames Clay Vales National Character Area (NCA).
- There are a variety of heritage assets within the Neighbourhood Plan area, including four scheduled monument's, four Grade I, nine Grade II* and 128 Grade II listed buildings.
- The Wallingford Conservation Area is within the Neighbourhood Plan area.

Land, soil and water resources

- Land in the Neighbourhood Plan area has been classified as Grade 1, Grade 2 and Grade 4 agricultural land based on Pre-1988 Agricultural Land Classification. In this context Grade 1 and Grade 2 can be considered as land classified as the best and most versatile.

- The Thames flows through the eastern section of the Neighbourhood Plan area.

Population and community

- The population of Wallingford has increased at a faster rate than the region as a whole between 2001 and 2011.
- The proportion of residents within different age categories broadly aligns with the regional and national averages.
- Households within the Neighbourhood Plan area are relatively not deprived in comparison to regional and national averages.
- There are six Lower Super Output Areas (LSOA's) covering the Neighbourhood Plan area: three of which are within the top 50% least deprived in England and the other three are in the top 10% least deprived in England.
- High unemployment rates and low wages mean that Wallingford is one of the least affordable places to live in England.
- Most residents within the Neighbourhood Plan area own a household either outright or by mortgage (64.5%), a lower rate than the district and regional averages. However this broadly aligns with the total for England.
- Within the Neighbourhood Plan area, there is a high proportion of highly qualified residents and a high percentage of residents working in the three highest occupational tiers.

Health and wellbeing

- 84.6% of residents in the Neighbourhood Plan area consider themselves as having 'very good health' or 'good health', similar to the totals for South Oxfordshire (85.9%), the South East of England (83.7%) and England (81.4%).
- Local doctor surgeries have reached their maximum capacity. Patient to doctor ratio (FTE) is currently 1280 to 1 – one of highest in England.
- A similar proportion of residents within the Neighbourhood Plan area report that their activities are limited in some way compared to regional and national averages.

Transportation

- The nearest railway station to the Neighbourhood Plan area is Cholsey, approximately 2.7km away.
- There are 17 principal bus routes which pass through the Neighbourhood Plan area, however they are fairly infrequent and two of them are for school pupils only.
- The Neighbourhood Plan area is well linked to the national road network, with access to the A4130 and a network of country roads.
- Residents have access to a network of footpaths within the Neighbourhood Plan area.
- National cycle route 5 is located within the Neighbourhood Plan area.
- 82.1% of residents within the Neighbourhood Plan area have access to a car or van.

SEA framework in full

SEA objective	Assessment questions
Air Quality	
Improve air quality in the Wallingford Neighbourhood Plan area and minimise and/or mitigate against all sources of environmental pollution.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Support a reduction of the emissions which led to the designation of the Wallingford Air Quality Management Area? • Promote the use of sustainable modes of transport, including walking, cycling and public transport? • Implement measures (such as appropriate planting and provision of green infrastructure) which will help support air quality in the Neighbourhood Plan area?
Biodiversity and geodiversity	
Protect and enhance all biodiversity and geological features.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Protect and enhance semi-natural habitats? • Protect and enhance priority habitats, and the habitat of priority species? • Achieve a net gain in biodiversity? • Support enhancements to multifunctional green infrastructure networks? • Support access to, interpretation and understanding of biodiversity and geodiversity?
Climate change	
Reduce the level of contribution to climate change made by activities within the Neighbourhood Plan area	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Reduce the number of journeys made? • Reduce the need to travel? • Promote the use of sustainable modes of transport, including walking, cycling and public transport? • Increase the number of new developments meeting or exceeding sustainable design criteria? • Generate energy from low or zero carbon sources? • Reduce energy consumption from non-renewable resources?
Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Ensure that inappropriate development does not takes place in areas at higher risk of flooding, taking into account the likely future effects of climate change? • Improve and extend green infrastructure networks in the plan area to support adaptation to the potential effects of climate change? • Sustainably manage water run-off, reducing surface water runoff (either within the plan area or downstream)? • Ensure the potential risks associated with climate change are considered through new development in the Neighbourhood Plan area? • Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks?

Landscape and historic environment

Protect, maintain and enhance the cultural heritage resource within the Neighbourhood Plan area, including the historic environment and archaeological assets.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Conserve and enhance buildings and structures of architectural or historic interest? • Conserve and enhance the setting of the Wallingford Conservation Area? • Support the integrity of the historic setting of key buildings and features of cultural heritage interest? • Conserve and enhance local diversity and character? • Support access to, interpretation and understanding of the historic environment?
Protect and enhance the character and quality of landscapes and townscapes.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Support landscape character reflecting the sensitivities of the four landscape types covering the Neighbourhood Plan area? • Conserve and enhance landscape and townscape features?

Land, soil and water resources

Ensure the efficient and effective use of land.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Promote the use of previously developed land? • Avoid the development of the best and most versatile agricultural land, which in the Neighbourhood Plan area may comprise Grade 1, 2 and 3a agricultural land?
Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Reduce the amount of waste produced? • Support the minimisation, reuse and recycling of waste? • Maximise opportunities for local management of waste in order to minimise export of waste to areas outside? • Encourage recycling of materials and minimise consumption of resources during construction?
Use and manage water resources in a sustainable manner.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Support improvements to water quality? • Minimise water consumption? • Protect sensitive groundwater resources in the Neighbourhood Plan area?

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.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Promote the development of a range of high quality, accessible community facilities? • Encourage and promote social cohesion and encourage active involvement of local people in community activities? • Minimise fuel poverty? • Maintain or enhance the quality of life of existing local residents?
Reduce deprivation and promote a more inclusive and self-contained community.	<ul style="list-style-type: none"> • Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people? • Support the provision of land for allotments and cemeteries?
Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Support the provision of a range of house types and sizes? • Support enhancements to the current housing stock? • Meet the needs of all sectors of the community? • Provide quality and flexible homes that meet people's needs? • Promote the use of sustainable building techniques, including use of sustainable building materials in construction? • Provide housing in sustainable locations that allow easy access to a range of local services and facilities?

Health and wellbeing

Improve the health and wellbeing residents within the Neighbourhood Plan area.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Promote accessibility to a range of leisure, health and community facilities, for all age groups? • Provide and enhance the provision of community access to green infrastructure, in accordance with Accessible Natural Greenspace Standards? • Reduce noise pollution? • Promote the use of healthier modes of travel? • Improve access to the countryside for recreational use?
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Transportation

Promote sustainable transport use and reduce the need to travel.	<p>Will the option/proposal help to:</p> <ul style="list-style-type: none"> • Encourage modal shift to more sustainable forms of travel? • Enable sustainable transport infrastructure enhancements? • Facilitate working from home and remote working? • Improve road safety? • Reduce the impact on residents from the road network?
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Appendix III – OCC letter

**County Hall
New Road
Oxford
OX1 1ND**

**Director for Planning and Place
– Susan Halliwell**

14 August 2017

Wallingford Neighbourhood Plan Committee

Attn: Rachel Rae – Project Manager
Email: wnplan@wallingfordtowncouncil.gov.uk

Copy: planning.policy@southoxon.gov.uk

Dear Wallingford Neighbourhood Plan Committee

Wallingford Neighbourhood Plan – Early consultation

We have noticed your website and the link to consultation boards presented at a public exhibition, asking for comment by 19th August.

We are taking this opportunity to provide you with some initial comments. In line with our normal practice as set out in our [Neighbourhood Planning Toolkit](#), we will respond in more detail when you prepare a draft pre-Submission Neighbourhood Plan.

We have particularly noted the final exhibition board which provides a summary of assessment for Sites A1, A2 and Ea. A copy of the assessments is attached to this letter.

In respect of site Ea, we note the current application P16/S4275/O. The County's responses on this application are available on the online [planning application register](#). In our last response in July 2017 we confirmed that there was no County objection.

In contrast, the County Council has concerns with the suggestion of potential development at Site A (A1 + A2). Site A has a history which includes its consideration for allocation in respect of the South Oxfordshire Core Strategy which was adopted in 2012. No part of it was allocated at that time, the site allocated was Slade End Farm (Site B) which has proceeded and now has a resolution to approve from South Oxfordshire District Council's Planning Committee. The County Council opposed Site A, with a particular objection concerning its potential use for mineral working.

Transport

From a transport point of view, the County Council has concerns regarding access and the potential additional traffic affecting the AQMA in Wallingford. The AQMA in the centre of Wallingford is a material consideration when considering traffic generation and distribution for developments in the vicinity. The historic road layout and traffic signals in the centre, operating at capacity, are such that improving vehicle flow rates through mitigation is not possible. Therefore any increase in traffic levels as a consequence of residential developments which do not adequately distribute site development traffic, would be detrimental to the AQMA due to additional queue lengths and journey times.

Site A (A1 and A2) are also relatively remote from bus services and bus stops. Travel by sustainable modes may therefore be lower than in other locations.

Minerals and Waste

Strong concern over the potential allocation of sites A1 and A2 for residential development is raised due to minerals safeguarding issues.

These sites are both fully within a Strategic Resource Area and Mineral Safeguarding Area for sharp sand and gravel in the Oxfordshire Minerals and Waste Local Plan: Part 1 – Core Strategy (as found sound subject to recommended main modifications in the Inspector’s report dated 15 June 2017), policies M3 and M8. In addition, both sites lie within a mineral consultation area under policy M8.

Please note that the site profile for Site A2 on the final page of the Wallingford Boards June 2017 document incorrectly states that “Furthermore, the eastern portion of the site, capable of accommodating circa 250 dwellings, appears to be outside the latest OCC minerals safeguarding plan”.

In particular, the following local plan policies are relevant:

a) Saved Oxfordshire Minerals and Waste Local Plan policy SD10 on protection of mineral resources. This policy dates from 1996 but it is consistent with the NPPF (paragraph 143, bullet 3). Under this policy, development which would prejudice the working of mineral deposits should not be permitted unless it can be shown that the need for the development outweighs the economic and sustainability considerations relating to the mineral resource. Under saved policy SD11, development which is contrary to policy SD10 may be permitted if the mineral deposits are worked prior to the development taking place.

b) Oxfordshire Minerals and Waste Local Plan: Part 1 – Core Strategy (as found sound subject to recommended main modifications in the Inspector’s report dated 15 June 2017) policy M8 on safeguarding mineral resources. Under this policy, development that would prevent or otherwise hinder the possible future working of minerals within a mineral safeguarding area will not be permitted unless it can be shown that:

- The site has been allocated for development in an adopted local plan or neighbourhood plan; or
- The need for the development outweighs the economic and sustainability considerations relating to the mineral resource; or
- The mineral will be extracted prior to the development taking place.

The draft Oxfordshire Minerals and Waste Local Plan Part 1 - Core Strategy (OMWCS) was submitted to the Secretary of State for independent examination in December 2015. Following an examination hearing held in September 2016, the Inspector issued his Report on 15 June 2017. He concludes that with his recommended main modifications, the OMWCS satisfies the requirements of Section 20(5) of the Planning and Compulsory Purchase Act 2004 (as amended) and meets the criteria for soundness in the National Planning Policy Framework. At its meeting on 18th July

2017, the Council's Cabinet resolved to recommend to the County Council that the OMWCS be adopted with the Inspector's recommended main modifications and any required additional modifications that do not materially affect the policies, in accordance with Section 23(3) of the 2004 Act. Therefore, although the OMWCS is not yet adopted, it is at a very advanced stage and the draft policies with the Inspector's recommended main modifications should accordingly be given considerable weight.

Therefore, planning policy for the safeguarding of minerals should be taken fully into account in the consideration of sites A1 and A2 as potential sites for housing development.

Yours sincerely

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ATTACHMENT

Copy of Exhibition Board Assessment

Land North of Wallingford (west) (Site A1)



Size: 21.5ha (approx.)

Possible use: 537 residential units (based on minimum 25 dwellings per hectare)

Is the site suitable? In addition to the general concerns of suitability for all sites, this site would result in additional traffic on Wantage Road, which will be under pressure in the future from the development of Site B. In addition, OCC has safeguarded the site for minerals extraction, which makes delivery of the site within the plan period uncertain. It has poor connectivity for pedestrians and cyclists.

Is the site available? Yes, it is available for housing development.

Is it achievable? It is currently expected that the site is financially viable, subject to any mitigation required.

CURRENT EVALUATION: The site assessment process currently indicates that this site is not the most suitable of the potential sites for strategic housing location. It is more remote than Site A2 and would result in transport pressure on the Wantage Road, in addition to that resulting from development of Site B.

Land North of Wallingford (east) (Site A2)



Size: 20ha (approx.)

Possible use: 500 residential units (based on minimum 25 dwellings per hectare)

Is the site suitable? Of the three sites considered for strategic housing allocation this site is considered to be the most suitable. It is the most closely located to key destinations and would not increase traffic in areas already noted for high pressure, provided that access is to the Shillingford Road and not Norries Drive or Wilding Road. Furthermore, the easternmost portion of the site, capable of accommodating circa 250 dwellings, appears to be outside the latest OCC minerals safeguarding plan.

Is the site available? Yes, it is available for housing development.

Is it achievable? It is currently expected that the site is financially viable, subject to any mitigation required.

CURRENT EVALUATION: The site assessment process currently indicates that this site is the most suitable location for new housing allocation. The WNP is not required to allocate an entire site, so the eastern part of site A2 could provide the majority of dwellings required by SODC for future need.

Providing housing on one site will allow a critical mass of infrastructure and a range of housing types, such as different sizes and affordable housing, including for first time buyers.

Land North of A4130 Wallingford Bypass (Site Ea)



Size: 26.3ha (approx.)

Possible use: 435 residential units (based on minimum of 25 dwellings per hectare on less constrained part of site)

Is the site suitable? When compared to the other potential strategic sites, this site does not perform as favourably. The site is quite remote from important destinations such as the town centre, it has poor connectivity for pedestrians and cyclists and the highway impact is expected to be high. Additionally, part of the site is safeguarded for archaeological reasons and surface water flood risk is also present.

Is the site available? Yes, it is available for housing development.

Is it achievable? It is currently expected that the site is financially viable, subject to any mitigation required.

CURRENT EVALUATION: The site assessment process currently indicates that this site would be less suitable than Site A2.

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