

# Strategic Environmental Assessment (SEA) of the Wheatley Neighbourhood Plan

Environmental Report Update

Non-technical Summary

September 2019

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# Introduction

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

The WNP is being prepared by the WNP Committee, which convened in January 2016 with 21 members, including three Wheatley Parish Councillors (one of them a District Councillor), one Holton Parish Councillor, and the Business Manager of Wheatley Park Academy.

The WNP is being prepared in the context of the adopted South Oxfordshire Local Plan and the new emerging Local Plan, which was submitted to Government for examination in March 2019. Once the WNP has been ‘made’ (following a referendum) it will have material weight in deciding on planning applications, alongside the latest adopted South Oxfordshire Plan.

SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising the positives.

The Neighbourhood Plan is at an advanced stage of preparation, with the ‘submission’ version currently published for consultation, under Regulation 16 of the Neighbourhood Planning Regulations. An Environmental Report Update is published alongside.

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

## Structure of the Environmental Report Update / this NTS

SEA reporting essentially involves answering the following questions in turn:

1. What has plan-making / SEA involved up to this point?
  - including consideration given to ‘reasonable alternatives’.
2. What are the assessment findings at this current stage?
  - i.e. in relation to the proposals published for consultation.
3. What are the next steps?

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

## What’s the scope of the SEA?

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

*Table A: The SEA framework*

Topic	Objective
Air quality	Improve air quality in the Neighbourhood Plan area and minimise and/or mitigate against all sources of environmental pollution.
Biodiversity	Protect and enhance all biodiversity and geological features.
Climate change	Reduce the level of contribution to climate change made by activities within the Neighbourhood Plan area
	Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding
Landscape and heritage	Protect, maintain and enhance the heritage resource, including the historic environment and archaeological assets within, and within the setting of, the Neighbourhood Plan area.
	Protect and enhance the character and quality of landscapes and townscapes.

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

## PLAN-MAKING / SEA UP TO THIS POINT

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

As such, Part 1 of the SEA Report explains how work was undertaken to develop and alternative approaches to the allocation of land for housing and employment, or ‘growth scenarios’.

Specifically, Part 1 of the report -

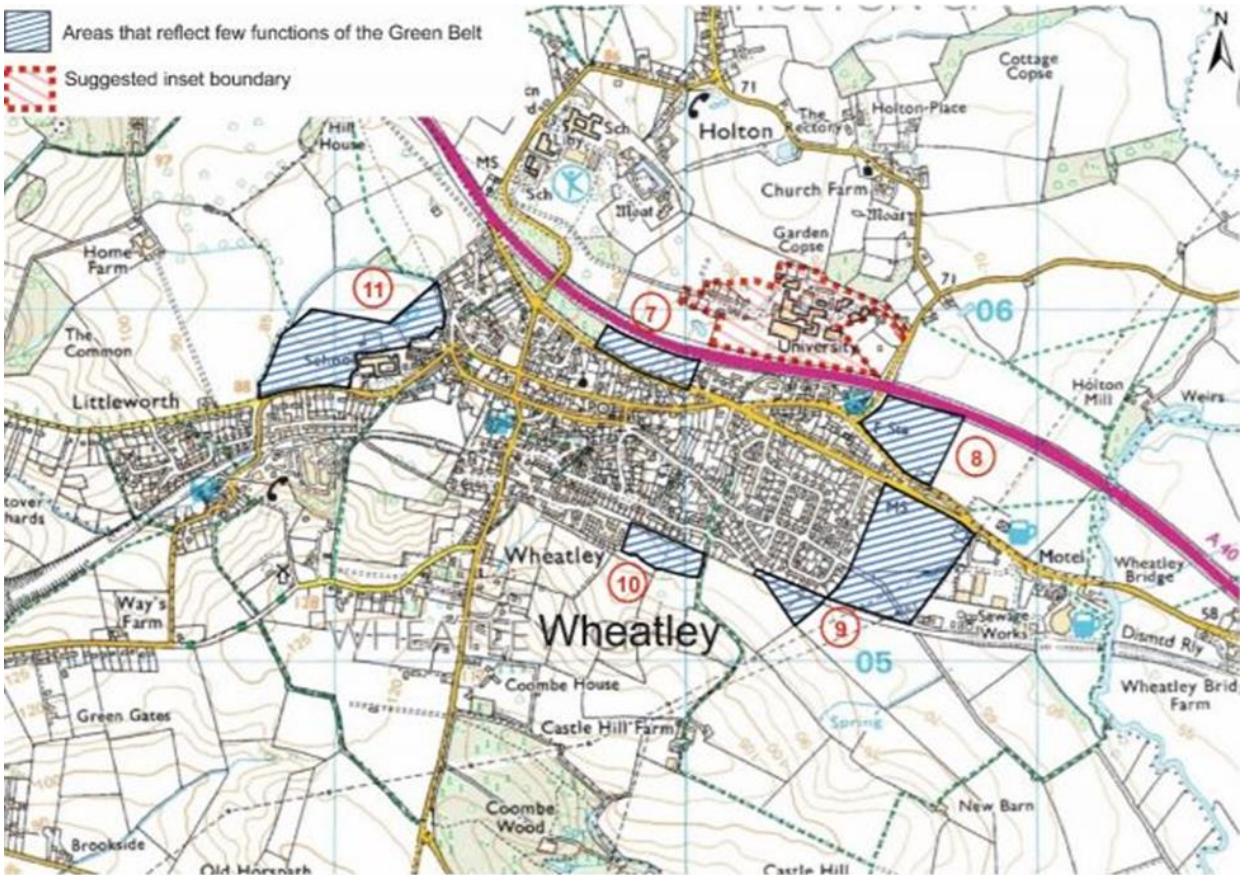
- 1) explains the process of **establishing** the reasonable alternatives;
- 2) presents the outcomes of **assessing** the reasonable alternatives; and
- 3) explains reasons for **establishing** the preferred option, in light of the appraisal.

### Establishing reasonable alternatives

The main report explains how reasonable alternative growth scenarios were established following a process of giving consideration to strategic parameters and the pool of sites (‘site options’) reasonably in contention for allocation. Key site options for consideration were the Green Belt parcels identified as potentially suitable for removal from the Green Belt by the South Oxfordshire Green Belt Study (2015) - see Figure A. Two further site options in contention are notably smaller, namely Littleworth industrial area, close to the western extent of the plan area, and ‘Land west of Asda’, close to the eastern extent of the plan area.

Furthermore, there is a need to note that the Oxford Brookes Wheatley Campus site will be allocated by the emerging South Oxfordshire Local Plan under any reasonably foreseeable scenario.

Figure A: Green Belt parcels examined as site options, as part of the process of arriving at reasonable alternative growth scenarios



Ultimately, the conclusion reached was that the alternative growth scenarios should explore the matter of whether the WNP should support redevelopment of Littleworth Industrial Estate, and which of either Green Belt Parcel 8 or 9 should be allocated in order to replace the industrial land lost, alongside enabling housing.

This led to the identification of three reasonable alternative housing growth scenarios - see Table B.

Table B: The reasonable alternatives

Site	Use(s)	Number of homes		
		Option 1	Option 2	Option 3
Completions and commitments <sup>1</sup>	Housing	131		
OBU Wheatley Campus		300		
Allocations	West of Asda	10		
	Littleworth industrial area	0	~25	
	Green Belt Parcel 8	0	~35	0
	Green Belt Parcel 9 (northern part)	0	0	55
<b>Total homes (net increase) 2011 - 2033</b>		<b>441</b>	<b>501</b>	<b>521</b>

<sup>1</sup> Homes at sites built since the start of the plan period ('completions') or with planning permission ('commitments')

**Appraising reasonable alternatives**

Table C presents assessment findings in relation to the three housing growth scenarios. Within each row (i.e. for each of the topics that comprise the SEA framework) the columns to the right hand side seek to both **categorise** the performance of each option in terms of ‘significant effects’ (using red / green) and also **rank** the alternatives in order of performance. Also, ‘ = ’ is used to denote instances where it not possible to differentiate the alternatives.

*Table C: Alternatives assessment findings*

Topic	Rank of performance / categorisation of effects		
	Option 1 Low growth	Option 2 GB parcel 8	Option 3 GB parcel 9
Air quality	★1	2	★1
Biodiversity	=	=	=
Climate change	=	=	=
Landscape and historic environment	★1	2	2
Land, soil and water resources	★1	2	2
Population and community	3	2	★1
Health and wellbeing	3	2	★1
Transportation	=	=	=

**Commentary**

- Air quality - this is not considered to be a major issue, with no Air Quality Management Area (AQMA) designated locally; however, Option 2 performs relatively poorly due to proximity of GB parcel 8 to the A40. It is considered likely that residents of any scheme on this site would be subject to some degree of noise and potentially air pollution from the road; however, it is recognised that there would be good potential to avoid/mitigate impacts, including potentially by locating employment adjacent to the road.
- Biodiversity - neither of the Green Belt parcels that would deliver higher growth are thought to have notable biodiversity value, and so these options are judged to perform on a par with low growth. GB parcel 9 would seem more sensitive than GB parcel 8, on the basis that it is associated with some shrubby, recently established habitats, plus a narrow lane (not publically accessible), associated with mature vegetation, runs through the site (dividing the two component fields). However, the difference between the two sites is considered marginal, especially once account is taken of the proposal to enhance the vegetated lane as part of an accessible green corridor (Green Route), and ‘contour’ development to provide a soft transition from the urban development to the Green Belt to the south.

- Climate change - the key consideration relates to climate change adaptation, and specifically the matter of flood risk, with none of the options associated with any climate change mitigation considerations. Flood risk is an issue for both of the GB parcels in question, in that a narrow band of flood risk runs along the London Road / Old London road, clipping the southern edge of GB parcel 8, and the northern edge of GB parcel 9 (also affecting the West of Asda, South of London Road site, which is a constant across the scenarios). It is anticipated that development, or at least residential development, within the flood risk zone can be avoided; however, there is also a need to consider the possibility of the road flooding, leading to difficulties with access/egress. GB parcel 9 may lend itself to two points of access (the feeder road which already services the existing industrial area, and the London Road to the north) helping to allay any concerns.
  - Landscape and historic environment - the SODC GB Study (2015) identified GB parcels 8 and 9 as reflecting 'few functions' of the Green Belt, but that is not to suggest that they reflect no functions. Parcel 8 could well be the more sensitive site, from a Green Belt perspective, recognising that the new Green Belt boundary would be relatively weak (at the site's eastern extent); however, there is no firm evidence upon which to reach a conclusion. In more general landscape terms there is thought to be little to differentiate the sites, with both quite well screened at close proximity and not thought to contribute notably to any important longer distance views (notably from the footpaths that run up Castle Hill, to the south); whilst in heritage terms neither site is thought to be subject to any notable constraint.
  - Land, soil and water resources - there is quite a strong likelihood that both sites comprise 'best and most versatile' (BMV) agricultural land, with the low resolution nationally available dataset suggesting a likelihood that the sites comprise land of 'grade 2' quality (and neither site having been surveyed in detail, applying the 'post 1988' criteria). GB parcel 9 is a larger site, such that there would be greater loss of agricultural land; however, the difference in scale is fairly marginal, and it is also noted that the site is not currently in agricultural use.
  - Population and community - a mixed use scheme at GB parcel 9 would deliver on the objective of 'village rationalisation' in a way that a mixed use scheme at GB parcel 8 would not. There would be a clear logic to the layout of Wheatley, with all major employment uses focused at the eastern extent of the village, and the rest of the village given over to residential, community and small scale employment. GB parcel 9 may also have the potential to deliver new burial space in a location that has been identified as more suitable than GB parcel 8 (when judged against criteria covering matters including access and setting); however, this is highly uncertain.
- Finally, there is a need to consider the local housing needs that would be met sooner under Options 2 and 3; however, this is a relatively marginal consideration, as the Wheatley Campus strategic allocation should begin to deliver new homes in the early 2020s (N.B. given a strong local housing market there is not considered to be any concern that a higher growth approach through the WNP could lead to a risk of delayed build-out of allocated sites).
- Health and wellbeing - development at GB parcel 9 would contribute significantly to the ambition of delivering a new green corridor (Green Route), through Wheatley. The narrow lane that runs through the site would be made publically accessible, thereby greatly increasing the potential for residents to walk or cycle to the Asda store, at the village's eastern extent, and the River Thames corridor beyond.
  - Transportation - GB parcel 9 would have two access points, including access onto the London Road. Conversely, GB parcel 8 would have only one access point, onto the narrower Old London Road. However, it is not clear that access to GB parcel 8 is problematic, and the site would benefit from being in very close proximity to the OBU Wheatley Campus site, which is due to be redeveloped.

## Establishing the preferred option

The following is the WNP Committee's response to the alternatives assessment:

*"Option 3 is the preferred option, in accordance with the alternatives assessment findings. Option 3 is found to perform well in terms of a number of objectives, in particular the socio-economic objectives, given the potential to deliver upon the objective of village 'rationalisation'.*

*Option 1 (do minimum) is certainly a genuine option, and it is notable that the assessment identifies this as the preferable option in certain environmental terms; however, the Parish Council feels that the inevitable environmental draw-backs to housing growth are warranted, given the potential for significant socio-economic benefits. Village rationalisation will also go hand-in-hand with improved ability to reach destinations within the village by walking/cycling, which is an important consideration from an environmental (climate change) perspective.*

*With regards to Option 2, the assessment shows this option to perform poorly. It is also noted that the assumption underpinning the assessment - namely that the site would be made available for mixed use development, thereby enabling employment uses lost through the redevelopment of Littleworth Industrial Estate to be relocated - may well not hold true."*

## ASSESSMENT FINDINGS AT THIS STAGE

Part 2 of the Environmental Report presents an assessment of the Submission Plan. Assessment findings are presented as a series of narratives under the 'SEA framework' headings.

The following overall conclusion is reached -

"In conclusion, the draft plan assessment... concludes that the submission version of the WNP is likely to lead to positive effects in relation to several SEA themes. These benefits largely relate to the Neighbourhood Plan's focus on enhancing the quality of life of residents through supporting the delivery of housing, employment and improved connectivity throughout the village. The WNP sets out the approach for the redevelopment of Village Enhancement Sites, once Green Belt release is confirmed through the emerging Local Plan. In this context the WNP seeks to meet local needs in more accessible locations; supporting local economic vitality while also protecting the natural environment.

This conclusion supports the findings of the alternatives assessment presented [above], which identified the preferred growth scenario as broadly performing well relative to alternatives, although alternatives were found to have a degree of merit in certain respects. Careful account was taken of alternatives when selecting the preferred option and finalising the plan for consultation, as discussed [above].

However, a significant negative effect is predicted both within [the alternatives assessment and draft plan assessment] in respect of 'Land, Soil and Water' due to the preferred housing growth strategy likely involving loss of high quality ('best and most versatile') agricultural land.

## Next steps

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

### Plan finalisation

Following consultation, any representations made will be considered by an independent examiner, whose role it will be to conduct an Independent Examination of the Plan. The Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the South Oxfordshire District emerging Local Plan and extant Core Strategy.

If the subsequent Independent Examination is favourable, the WNP will be subject to a referendum, organised by South Oxfordshire District Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the WNP will become part of the Development Plan for South Oxfordshire District, covering the defined Neighbourhood Plan Area.

### Monitoring

The plan document explains that the performance of the plan will be reviewed after one year, but does not discuss particular monitoring indicators. On the basis of the appraisal presented above, it is suggested that monitoring might focus upon: the needs of businesses displaced from the Littleworth Industrial area; need for retirement and extra care housing; and increased walking and cycling to key destinations in the village.