



Joint Henley and
Harpsden
Neighbourhood Plan

Joint Henley and Harpsden Neighbourhood Plan

2020-2035

Environmental Report

Submission Version

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Strategic Environmental Assessment (SEA) for the Revised Joint Henley and Harpsden Neighbourhood Plan

Environmental Report

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Non-technical summary

AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Revised Joint Henley and Harpsden Neighbourhood Plan ('Revised JHHNP') 2020-2035.

The Revised JHHNP is being prepared in the context of the South Oxfordshire District Council (SODC) Local Plan, and will replace the existing Joint Henley and Harpsden Neighbourhood Plan (2016) (hereafter referred to as the 'Made JHHNP'). The Made JHHNP now forms part of the SODC Development 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 positive effects. Central to the SEA process is publication of an Environmental Report alongside the draft plan that presents certain required information. The aim is to inform the consultation and, in turn, plan finalisation.

Preparing the Environmental Report essentially involves answering 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 NTS

This is the Non-Technical Summary (NTS) of the Environmental Report for the Revised JHHNP, in which the three questions are answered in turn. Firstly, there is a need to set the scene further by answering: *What's the scope of the SEA?*

What is the scope of the SEA?

The scope of the SEA is reflected in a list of topics and objectives, which, taken together indicate the parameters of the SEA and provide a methodological 'framework' for assessment. The SEA framework is presented below:

Table A: The SEA framework

SEA topic	SEA objective
Air quality	Improve air quality in the Neighbourhood Plan Area and minimise and/ or mitigate all sources of environmental pollution
Biodiversity	Protect and enhance all biodiversity and geodiversity.
Climate change	Continue to decrease GHG emissions and increase the resilience of the Neighbourhood Plan area to the effects of climate change.
Historic environment	Protect, conserve and enhance the historic environment.

SEA topic	SEA objective
Health and wellbeing	Improve the health and wellbeing of residents.
Landscape	Protect and enhance the character and quality of landscapes.
Land, soil and water resources	Ensure the efficient and effective use of land, protect soil quality and avoid the loss of high-quality agricultural land.
	Use and manage water resources in a sustainable manner.
Population and community	Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities.
	Reduce deprivation and promote a more inclusive and self-contained community.
	Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures
Transportation	Promote sustainable transport use and reduce the need to travel.

Plan making/SEA up to this point

An important element of the required SEA process involves assessing **reasonable alternatives** in time to inform development of the draft plan, and then publishing assessment findings in the Environmental Report.

As such, Part 1 of this report explains how work was undertaken to develop and assess a 'reasonable' range of alternative approaches to the allocation of land for housing, or **housing growth scenarios**.

The process of arriving at housing growth scenarios involved a process of considering the strategic context ('top down' factors), alongside understanding of the sites available and in contention for allocation ('bottom up' factors). The process is set out in Section 5, and summarised in a flow diagram.

Ultimately two housing growth scenarios were identified as reasonable and so warranting formal assessment under the SEA framework – see Table B.

*Table B: The reasonable housing growth scenarios
N.B. figures are for the SODC Local Plan period (2011-2035)*

Supply	Scenario 1	Scenario 2
Completions and commitments (including supply from existing JHHNP allocations that can safely be rolled forward)	1,216	
Additional housing at existing allocation Site 5 (Fairmile)	12	
Additional housing at existing allocation Site E (Stuart Turner)	20	
Allocation of Site 2 (Chiltern Centre)	3	
Allocation of Site 853a (Highlands Northern Field)	110	
Allocation of Site New 1 (North of Crossways, Shiplake)		20
Additional housing at existing allocation Site 1117 (Wyevale)		11
Additional housing at existing allocation Site C (Gillotts School)		30
Total supply 2011-2035	1361	1312
% above SODC Local Plan Policy H3 requirement (1,285)	6%	2%

Table C presents the assessment. Presented subsequently is the Neighbourhood Plan Committee's response to the assessment, i.e. reasons for supporting the preferred approach, which is **Scenario 1**.

Assessment methodology:

Within each row of Table C (i.e. for each of the topics that comprise the SEA framework) the columns to the right hand firstly rank the scenarios in order of preference and then, secondly, highlight instances of a predicted positive (**green**), minor positive (**light green**), minor negative (**amber**) or negative (**red**) significant effect on the baseline. Also, '=' is used to denote instances where the alternatives perform on a par (i.e. it not possible to differentiate between them).

Table C: Housing growth scenarios assessment

Topic	Scenario 1 Highlands Farm Northern Field	Scenario 2 Lower Shiplake Gillotts School
Air quality	★1	2
Biodiversity	★1	2
Climate change	=	=
Health	=	=
Historic environment	=	=
Landscape	2	★1
Land, soil & water resources	2	★1
Population & community	★1	2
Transportation	★1	2
Summary discussion		
<p>The assessment shows a mixed picture, with each of the scenarios associated with pros and cons. Scenario 1 is best-performing in respect of the most topics (four versus two); however, it does not automatically follow that Scenario 1 is best-performing overall, as the topics are not assumed to be of equal importance. It is for the decision-maker (also consultees), not this assessment, to assign weight to the various pros and cons and then arrive at a conclusion on which scenario is best-performing overall. For example, the view might be taken that particular weight must be placed on avoiding impacts to the AONB, which could lead to a conclusion that Scenario 2 is best-performing overall.</p>		

The plan-makers responded to the growth scenarios assessment is as follows:

“The preferred approach is to take forward Scenario 1 as the basis for the Revised JHHNP. This approach is considered to broadly align with the findings of the assessment, which finds Scenario 1 to perform well in terms of the majority of key sustainability issues, both in absolute terms and relative terms.

It is recognised that the AONB designation is a constraint to growth at Highlands Farm Northern Field. However, the SODC [Landscape Capacity Assessment](#) (2017) serves to indicate limited landscape sensitivity, and there will be good potential to take steps at the development management stage to mitigate landscape impacts, guided by policy set out in the Revised JHHNP.

With regards to Scenario 2, the assessment highlights a range of drawbacks, including on the basis that growth would be directed to the edge of Lower

Shiplake rather than the edge of Henley. It is recognised that further scenarios could feasibly be explored that would involve focusing growth solely at the edge of Henley; however, all such scenarios are judged to be ‘unreasonable’ on the basis of the discussion set out in Section 5 of this report.

The process of defining and assessing growth scenarios serves to highlight that there are no easy choices, in respect of planning for growth at Henley. Nonetheless there is a need to make a choice, and the Committee views Scenario 1 as best representing sustainable development on balance. Importantly, the preferred approach will deliver benefits to the Neighbourhood Area and meet the requirements set out in the Local Plan.”

Assessment findings at this stage

Part 2 of the Environmental Report presents an assessment of the Revised JHHNP as a whole, as it stands at the current time (consultation on the pre-submission plan).

Assessment findings are presented as a series of narratives under the SEA framework. The assessment reaches the following overall conclusions:

Overall, the Plan appraisal has served to highlight the potential for both positive and negative effects of significance.

Significant positive effects are anticipated in relation to the population and communities SEA theme as a result of the growth strategy which includes an element of employment and retail development alongside housing growth and provides a buffer to better secure housing delivery.

The potential for significant negative effects is also highlighted in relation to both landscape and the historic environment. This relates to the spatial strategy which proposes an element of development within the AONB, and development within the vicinity of a Scheduled Monument. Whilst policy mitigation is provided to a certain extent, further consultation with both Natural England and Historic England is recommended as the Plan progresses.

The growth strategy is also considered likely to increase traffic and congestion within the Plan area to some degree and this has minor negative implications for transportation, air quality and the designated conservation area. Despite this, major development is expected to seek the ‘air quality neutral’ benchmark which should avoid significant effects arising, particularly within the designated AQMA.

Minor negative effects are also anticipated in relation to land and soil resources, given an element of greenfield (and potential high-quality agricultural land) development. However, it is recognised that this is largely reflective of a lack of suitable alternative and available brownfield sites.

Minor positive effects are concluded in relation to both climate change and health and wellbeing, predominantly reflecting the potential for connected and resilient development. Broadly neutral effects are concluded in relation to biodiversity and water resources, with no significant deviation from the baseline anticipated.

Next steps

This Environmental Report is published alongside the pre-submission version of the JHHNP. Following consultation, any representations made will be considered by the Neighbourhood Plan Committee, when finalising the plan for submission.

The 'submission' version of the plan will then be submitted to SODC (alongside an Environmental Report Update, if necessary). The plan and supporting evidence will be then published for further consultation, and then submitted for examination.

If the outcome of the Independent Examination is favourable, the Revised JHHNP will then be subject to a referendum, and the plan will be 'made' if more than 50% of those who vote are in support. Once made, the Revised JHHNP will become part of the Development Plan for South Oxfordshire District.

1. Introduction

Background

- 1.1 AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Revised Joint Henley and Harpsden Neighbourhood Plan ('Revised JHHNP') 2020 – 2035.
- 1.2 The Revised JHHNP is being prepared in the context of the South Oxfordshire District Council (SODC) Local Plan, and will replace the existing Joint Henley and Harpsden Neighbourhood Plan (2016) (hereafter referred to as the 'Made JHHNP'). The Made JHHNP now forms part of the SODC Development Plan.
- 1.3 SEA is a required process for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to minimising negative effects and maximising positive effects.¹

SEA explained

- 1.4 It is a requirement that the SEA process is undertaken in-line with the Environmental Assessment of Plans and Programmes Regulations 2004.
- 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*".² 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

- 1.7 This report is the Environmental Report for the Revised JHHNP. It is published alongside the 'pre-submission' version of the Plan, under Regulation 14 of the Neighbourhood Planning Regulations (2012, as amended).
- 1.8 This report answers questions 1, 2 and 3 in turn, to provide the required information.³ Each question is answered within a discrete 'part' of the report.
- 1.9 However, before answering Q1, two further introductory sections are presented to further set the scene.

¹ 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. The Revised JHHNP was subject to screening in 2021, on the basis of which it was determined that there *is* a requirement for SEA (i.e. the plan was 'screened-in').

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

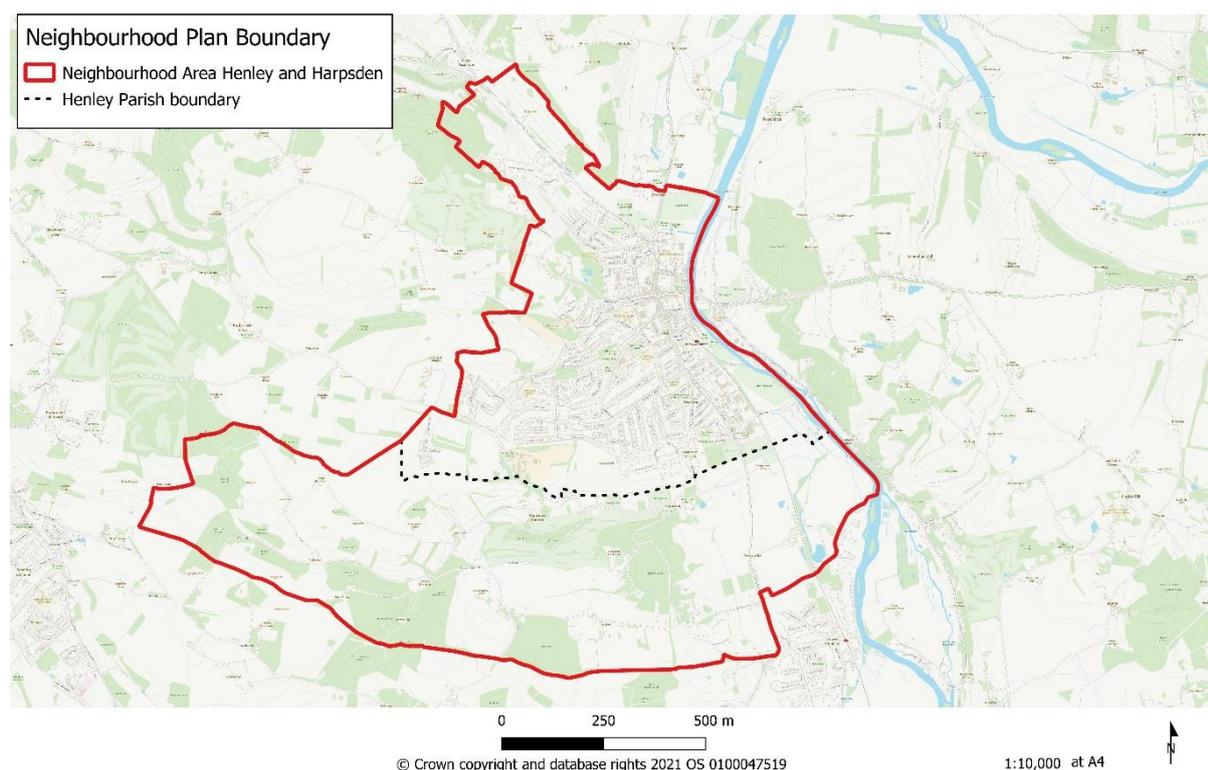
³ See **Appendix A** for further explanation of the report structure including its regulatory basis.

2. What is the plan seeking to achieve?

Introduction

- 2.1 This section considers the context provided by the SODC Local Plan before setting out the established Revised JHHNP vision and objectives.
- 2.2 Figure 2.1 shows the plan area, as well as the boundaries of the two component town / parish councils.

Figure 2.1: The Revised JHHNP area



The SODC Local Plan

- 2.3 Of central importance is Policy HEN1: The Strategy for Henley-on-Thames, which states:

“Neighbourhood Development Plans are expected to, and the Council will support development proposals that:

- deliver homes in accordance with Policy H3;
- strengthen the retail offer within Henley Town Centre;
- enhance the town’s environment and conserve and enhance the town’s heritage assets;
- strengthen and improve the attraction of Henley-on-Thames for visitors and
- provide leisure opportunities;
- improve accessibility, car and cycle parking in the Town Centre, and pedestrian and cycle links;

- improve employment opportunities at existing employment sites and identify new sites for employment;
 - address air quality issues;
 - support Henley College and Gillotts School to meet their accommodation needs; and
 - provide new, or enhanced community facilities that meet an identified need.”
- 2.4 Policy H3 then goes on to set a ‘housing requirement’ for Henley, specifically 1,285 homes” over the plan period, which is 2011 – 2035. The supporting text to the policy explains that, as of 1st April 2020, the great majority of these homes had already been built (‘completions’), or are set to come forward at sites that are ‘committed’, in that they benefit from planning permission or an existing allocation, leaving an ‘outstanding requirement’ for the Neighbourhood Plan of 115 homes. Since 1st April 2020 further homes have become committed, such that the outstanding requirement is now 69 homes.
- 2.5 With regards to Harpsden, the village is categorised as a Smaller Village, such that the key policy within the Local Plan is Policy H8: Housing in the Smaller Villages. This encourages Neighbourhood Plans to allocate sites so as to secure an increase in dwelling stock of 5-10% over the plan period, but is not prescriptive (unlike Policy H3).
- 2.6 Finally, there is a need to note Local Plan Policies EMP5 and TC4, which set requirements for Henley in respect of employment and supermarket floorspace respectively. The requirement for employment space has already been met, whilst the requirement for supermarket floorspace remains outstanding.

The Revised JHHNP objectives

- 2.7 The Revised JHHNP is being prepared by Neighbourhood Plan Committee (NPC) and will cover the period 2020 to 2035.
- 2.8 The following vision has been established:
- “In 20 years’ time, Henley on Thames and the surrounding village of Harpsden will have a sustainable community, meeting the needs of current and future generations who live and work here and for visitors where possible. The community will be resilient in its capacity to address the likely impact of climate change whilst still protecting the special qualities of the area.”*
- 2.9 A series of 31 objectives have also been established to guide plan preparation, with a view to achieving the vision. The objectives cover five key themes:
1. Environment, sustainability and design quality
 2. Housing
 3. Traffic and transport
 4. Retail, town centre and economy
 5. Social infrastructure

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 themes and objectives that should be a focus of the SEA. Supplementary information is presented in Appendix B.

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. As such these authorities were consulted over the period April to May 2020, and the responses received are detailed in Appendix B.

The SEA framework

- 3.3 Table 3.1 presents a list of topics and objectives that together form the backbone of the SEA scope. Together they comprise a ‘framework’ under which to undertake assessment.

Table 3.1 The SEA framework

SEA topic	SEA objective
Air quality	Improve air quality in the Neighbourhood Plan Area and minimise and/ or mitigate all sources of environmental pollution
Biodiversity	Protect and enhance all biodiversity and geodiversity.
Climate change	Continue to decrease GHG emissions and increase the resilience of the Neighbourhood Plan area to the effects of climate change.
Historic environment	Protect, conserve and enhance the historic environment.
Health and wellbeing	Improve the health and wellbeing of residents.
Landscape	Protect and enhance the character and quality of landscapes.
Land, soil and water resources	Ensure the efficient and effective use of land, protect soil quality and avoid the loss of high-quality agricultural land.
	Use and manage water resources in a sustainable manner.
Population and community	Cater for existing and future residents’ needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities.
	Reduce deprivation and promote a more inclusive and self-contained community.
	Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures
Transportation	Promote sustainable transport use and reduce the need to travel.

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

4. Introduction (to Part 1)

Overview

- 4.1 Work on the Revised JHHNP has been underway for some while, with several informal consultation events having been held, including an exhibition at Henley Town Hall held over a two-day period and a number of online events facilitated by Community First Oxfordshire. An important step was taken in January 2021, when a survey was sent to every household in Henley and Harpsden, with a view to understanding key issues. This led to 770 responses, and report of the findings is available on the JHHNP [website](#).
- 4.2 This is important context; however, the aim here is not to provide a comprehensive explanation of work to date. Rather, the aim is to explain work undertaken to develop and appraise **reasonable alternatives** in summer 2021.
- 4.3 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, namely the allocation of land for housing, or **housing growth scenarios**.

Why focus on housing growth scenarios?

- 4.4 The decision was taken to develop and assess reasonable alternatives ('scenarios') in relation to the matter of housing growth in light of the Plan objectives (see para 2.8), and because there is the likelihood of being able to differentiate between the merits of alternatives/scenarios in respect of 'significant effects'. National Planning Practice Guidance is clear that SEA should focus on matters likely to give rise to significant effects.

Who's responsibility?

- 4.5 It is important to be clear that:
- **Defining scenarios** - is ultimately the responsibility of the plan-maker, although the SEA consultant (AECOM) is well placed to advise.
 - **Assessing scenarios** - is the responsibility of the SEA consultant.
 - **Selecting a preferred scenario** - is the responsibility of the plan-maker.

Structure of this part of the report

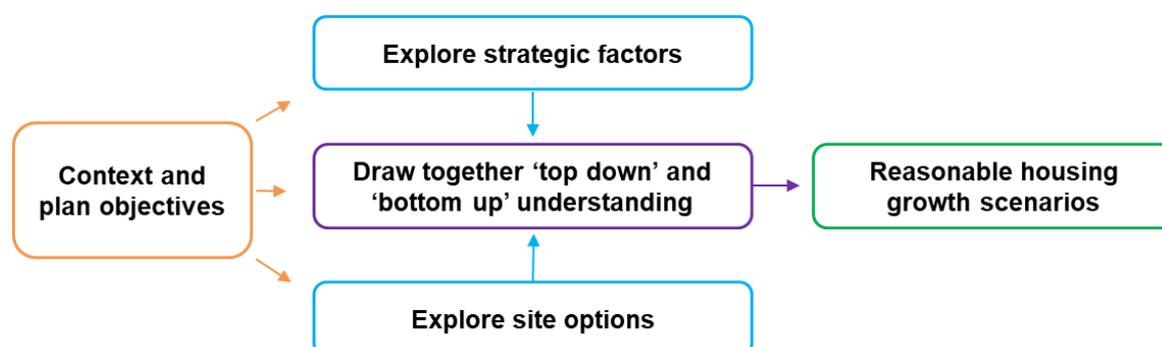
- 4.6 This part of the report is structured as follows:
- **Chapter 5** - explains the process of defining scenarios;
 - **Chapter 6** - presents the outcomes of assessing scenarios;
 - **Chapter 7** - explains reasons for supporting the preferred approach.

5. Defining scenarios

Introduction

- 5.1 The aim here is to explain a process that led to the definition of a reasonable range of housing growth scenarios for assessment, and thereby present “an outline of the reasons for selecting the alternatives dealt with”.⁴
- 5.2 Specifically, there is a need to: **1)** explain strategic factors with a bearing on defining 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 through steps (1) and (2) were married together in order to arrive at reasonable housing growth scenarios.

Figure 5.1: Defining scenarios



Strategic factors

- 5.3 The aim of this section is explore the strategic factors with a bearing on the establishment of reasonable housing growth scenarios. Specifically, this section of the report explores:
- Quantum – how many new homes must the Revised JHHNP provide for?
 - Broad distribution – broadly where is more/less suited to allocation?

Quantum

- 5.4 As discussed in Section 2, the SODC Local Plan identifies a need for the Revised JHHNP to provide for 115 homes over the period 2020 to 2035, but the outstanding requirement has now reduced to 69 homes.
- 5.5 There are three further points to note.

⁴ Schedule 2(8) of the SEA Regulations.

- 5.6 Firstly, the SODC Local Plan is clear that requirement is a minimum figure, and is generally supportive of considering higher growth options.⁵ Affordable housing need can be one reason for seeking to provide for higher growth (recognising that affordable housing primarily comes forward as a proportion of market housing),⁶ and this argument does apply in the Henley context; indeed, it applies very strongly. Whilst calculating affordable housing needs is not an exact science, needs are explored within the Henley [Housing Needs Assessment](#) (HNA, 2020), which finds that the total need for affordable housing, over the plan period, is in excess of the total number of homes anticipated to come forward (see paragraph 6). This indicates an acute situation, and concerns are further increased on the basis of past affordable housing delivery and tenure split considerations.⁷
- 5.7 Secondly, there is a need to consider providing for more than 69 homes through the Revised JHHNP to account for housing needs arising from Harpsden. However, these are likely to be modest, given a current *population* of ~560 and recalling that Local Plan Policy H8 encourages an increase in *dwelling stock* at smaller villages of 5-10% *over the period 2011 to 2035*.
- 5.8 Thirdly, it is good practice to provide for a ‘supply buffer’ on top of the requirement, in the knowledge that one or more of the sites within the supply may be subject to unforeseen delivery issues; for example, the plan might aim for a 10% buffer over-and-above 69 homes outstanding requirement figure, which would suggest a need to identify a total supply of circa 75 homes.

Broad distribution

- 5.9 The headline broad spatial consideration, with a bearing on establishing housing growth scenarios is the Chilterns Area of Outstanding Natural Beauty (AONB), which heavily constrains all of the Henley urban edge, bar the south (east of Gillotts School). The AONB also constrains the western half of Harpsden Parish, but does not directly constrain the eastern half of the parish. This factor, when viewed in isolation, suggests a need to consider directing growth to the eastern half of Harpsden Parish; however, areas that come into consideration for allocation – having accounted for the valley and flood risk zone that strongly defines the southeast edge of Henley, and the setting of Harpsden as a historic settlement (with its grade 2 listed medieval church and grade 2* listed Harpsden Court) – relates poorly to Henley and Harpsden, instead relating more closely to Lower Shiplake (Shiplake Parish). This gives rise to clear concerns regarding meeting housing needs and connectivity / car movements, plus there are other constraints in this area (discussed below).

⁵ Paragraph 4.14, which deals with Market Towns including Henley, directs the plan to “meet or exceed” the requirement figure, and then the subsequent paragraph explains how the preferred growth strategy must be determined on the balance of evidence. The equivalent discussion in respect of larger villages at paragraph 4.28 is more explicit, explaining: “*Ultimately the detailed evidence base will need to be provided to support each Neighbourhood Development Plan and its assessment of capacity, whether this is to support a higher or lower number than [the Local Plan requirement figure].*”

⁶ This point is well understood in the context of Local Plans, with paragraph 024 of the Government’s Planning Practice Guidance (PPG) on housing needs assessment explaining: “*An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.*”

⁷ The HNA set out that only 4% of new homes in Henley over the period 2011 to 2019 were affordable, in contrast to the current Local Plan requirement of 40% (see paragraph 12 of the HNA); however, there is now more updated evidence, which shows an improved situation. Most notably, there has been recent completion of 49 affordable homes at Highlands Farm, of which 41 are for affordable rent, with the remaining eight affordable home ownership, specifically shared ownership. There is a particular need for affordable and social rented affordable housing tenures, with the HNA finding that all affordable homes delivered in Henley over the period 2011 to 2019 were in the affordable home ownership tenure category (see paragraph 11). Also, further challenges result from the Government’s recent announcement that at least 25% of affordable homes should be “First Homes”.

5.10 There are a range of other strategic spatial considerations, including as listed within Policy HEN1 of the SODC Local Plan (see paragraph 2.3, above). A key point to elaborate upon here is the need to support the achievement of objectives for the highly valued town centre, and support connectivity to the town centre. Amongst other things, a key objective is to reduce traffic through the town centre, including with a view to addressing air quality issues, with much of the town centre being designated as an Air Quality Management Area (AQMA). This objective has important implications for spatial strategy; for example, there is a need to support growth at locations well connected to the town centre by non-car modes of travel, as far as possible.

Site options

- 5.11 Having discussed strategic, ‘top-down’ factors with a bearing on establishing housing growth scenarios (i.e. alternative packages of site allocations to provide for the outstanding housing requirement) the next step is to consider the sites options that are in contention for allocation.
- 5.12 A key starting point is the Site Options Assessment (SOA, 2021), which examines 41 sites, classifying the suitability of each for development on a three point (red-amber-green) scale.
- 5.13 The first of these sites to consider here are those that benefit from an allocation within the Made JHHNP, and where the decision to simply roll-forward the existing allocation into the Revised JHHNP is relatively clear cut. There are three such sites with a combined capacity of 92 homes, namely **Site 991**, **Site E** and **Site X** in Figure 5.2 (overleaf). The anticipated supply from these sites is accounted for within the calculation that leads to the outstanding figure for the Revised JHHNP (115 homes in the SODC Local Plan, now reduced to 69 homes). As a further point, it is notable that two of these sites are potentially associated with delivery challenges, which serves to highlight the importance of planning for a ‘supply buffer’ over-and-above the 69 homes requirement figure.⁸
- 5.14 The next port of call is **Site C**, which is an existing allocation for 50 homes (i.e. 50 homes supply is accounted for within the calculation that leads to the outstanding figure for the Revised JHHNP). The landowner is now proposing an 80 homes scheme (i.e. 30 homes additional supply, which would count towards the outstanding housing requirement for the Revised JHHNP); however, the Neighbourhood Plan Committee does not support this option. Nonetheless, it is an option to discuss further for the purposes of arriving at reasonable housing growth scenarios – see further discussion below.
- 5.15 The next port of call is **Site J**, which is an existing allocation for 30 homes, but where the latest evidence serves to suggest the potential to deliver 50 homes (i.e. 20 homes additional supply, which would count towards the outstanding housing requirement for the Revised JHHNP). The Neighbourhood Plan Committee supports the 50 home scheme, and it is understood to be relatively non-contentious. This is a previously developed site in the urban area with low sensitivity, and the increase in capacity would assist with ensuring viability and therefore timely delivery.

⁸ Firstly, Site E is in active use as an employment site. Secondly, Site X is being proposed for C2 older persons accommodation, contrary to the existing and proposed allocation for C3 homes.

- 5.16 The next port of call is **Site 5**, which comprises an existing allocation for 60 homes plus a small area of additional land (a house and garden). A pending planning application ([P19/S2350/FUL](#)) suggests the potential to deliver 72 homes across the expanded site (i.e. 12 homes additional supply, which would count towards the outstanding housing requirement for the Revised JHHNP), and the Neighbourhood Plan Committee is supportive of this approach (i.e. quantum of homes). There are sensitivities;⁹ however, on balance, there is no need to call into question the 72 home scheme, for the purposes of arriving at reasonable housing growth scenarios, recognising the stretching housing requirement and constraints/challenges associated with other site options.
- 5.17 On the basis of the discussion above there are relatively ‘easy win’ options to deliver 32 homes (20 homes at Site E plus 12 homes at Site 5), of the 69 homes outstanding requirement figure. As such, there is a clear need to explore further site options, over-and-above those discussed above (this would be the case even if it were to be assumed that Site C is suited to delivering a higher density scheme).
- 5.18 The first port of call is the list of sites assigned a **green** rating by the SOA. There are nine such sites, of which five have already been discussed above. Taking the remaining four sites in turn:
- Site 2 – stands out as performing very strongly, as a previously developed site in the urban area. It has capacity to deliver three homes.
 - Sites 1117 and New 1 – are located on the edge of Lower Shiplake, which gives rise to concerns; nonetheless, there is a need to explore these sites further – see further discussion below.
 - Site 853a – would comprise a northern extension to the 170 home Highlands Farm allocation within the Made JHHNP, which is now under construction. The SOA supports this site on the basis of its relationship with the current built form of the Henley urban edge (once account is taken of the committed site currently under construction); however, there are also clear sensitivities; most notably, the site falls within the AONB. It is discussed further below.
- 5.19 The sites discussed above are potentially sufficient ‘ingredients’, for the purposes of arriving at reasonable growth scenarios; however, there is also a need to discuss the other sites found to perform less well by the SOA.
- 5.20 Beginning with the six **amber** rated sites, one has already been discussed above (Site E), and a second (Henley College; not shown on Figure 5.2) is now understood to be unavailable. The remaining four sites – **Site 13**, **Site 14**, **Site 878** and **New 2** – are clustered at the northern edge of Lower Shiplake. These sites are discussed further below, alongside the two nearby green-rated sites.
- 5.21 Finally, the SOA assign 26 sites a **red** rating, on the basis of poor suitability for allocation. It is understood (on the basis of discussion with lead officer at Henley Town Council) that one site stands-out as warranting particular attention, namely Site 6, which is a large (~6.5 ha) greenfield site at the southern edge of Henley.¹⁰ A stream and associated flood risk zone passes

⁹ The broad area (Fairmile) is highly sensitive from a landscape and heritage perspective, plus there are site specific constraints, with the already allocated part of the site containing woodland priority habitat, and the garden now proposed to be allocated containing mature trees and a very small patch of traditional orchard priority habitat.

¹⁰ The final site shown on Figure 5.1 is Site 1158, which was originally identified as a better performing red-rated site by the Town Council’s lead officer, on the basis of a commitment to providing for affordable housing over-and-above the level required by policy (40%); however, it was subsequently established that this is not the intention.

through the site, which reduces the developable area, leading to an assumed capacity of 39 homes. The landowner has proposed to provide a level of affordable housing over-and-above the required 40%, which is an important 'plus'; however, the site nonetheless does not warrant being progressed to the reasonable housing growth scenarios. This is due to landscape sensitivities and a concern that development would lead to coalescence with Harpsden.

5.22 In conclusion, the following sites are progressed for further discussion:

- Site 991, Site E, Site X – supply from these existing allocations is already accounted for, and there is no reason to call this supply into question.
- Site C – supply is already accounted for, and there is no reason to call this supply into question; however, there is the option of additional supply.
- Site J – supply is already accounted for, and there is no reason to call this supply into question; 20 homes additional supply can also be assumed.
- Site 5 – supply is already accounted for, and there is no reason to call this supply into question; 12 homes additional supply can also be assumed.
- Site 2 – is a strongly performing 'new' allocation for three homes,
- Lower Shiplake cluster (six sites) – all warrant further consideration, mindful that two of these sites are identified as better performing by the SOA.
- Site 853a – clearly further warrants consideration.

Figure 5.2: Shortlist of sites in contention for allocation



The reasonable scenarios

- 5.23 To recap, the outstanding requirement, having accounted for completions and commitments since the start of the plan period, is 69 homes.
- 5.24 On the basis of the discussion above, there are three sites with the potential to deliver supply that counts towards this requirement where the decision to support this supply is relatively non-contentious, and so can be assumed here, for the purposes of arriving at reasonable housing growth scenarios. Specifically, 35 homes supply from Site E, Site 5 and Site 2 can be assumed.
- 5.25 This leaves a shortfall of 34 homes against the requirement figure (which, to reiterate, is a minimum figure, plus there is a need for a 'supply buffer').
- 5.26 A first port of call is allocation of **Site 853a** (Highlands Farm Northern Field) for 110 homes. Allocation would lead to a total supply figure of 145 homes, which equates to the requirement figure (for the Revised JHHNP plan period) plus 110%; however, this is not unreasonable, given that the requirement is a minimum figure, plus there is a risk of unforeseen delivery issues. The need for affordable housing within Henley provides a clear reason for exploring higher growth options, and Site 853a is suited to delivering 40% affordable housing.
- 5.27 The next sites to consider are the two green-rated sites adjacent to Lower Shiplake, namely **Site 1117** and **Site New 1**. However, the combined capacity of these sites (or, more specifically, the additional supply that would be achieved, recognising that Site 1117 has permission for 40 homes, with the latest proposal being to deliver an additional 20 homes) is 31 homes, which falls short 34 homes 'shortfall' figure discussed above. There are broadly two options for achieving additional supply:
- Additional allocation of one or more Lower Shiplake sites – there are four **amber-rated sites**, but all are associated with clear issues that serve as arguments against allocation. Detailed discussion is set out in the Town Council's Site Selection Process [Paper](#), but headline concerns are considered to be: 1) three of the sites have capacity for below ten homes, such that they would be unlikely to deliver affordable housing; 2) the one large site (New 2) is relatively poorly related to Lower Shiplake; and 3) there is a clear argument against directing additional growth to the edge of Lower Shiplake to meet the housing needs of Henley. On the basis of this discussion, the option of additional supply through one or more of the amber-rated sites at the edge of Lower Shiplake is ruled out as unreasonable.
 - A higher density scheme at **Site C** – the Town Council's Site Selection Process [Paper](#) sets out clear arguments against an 80 home scheme (as opposed to a 50 home scheme, as per the allocation within the Made JHHNP), and there is currently no available masterplan or other detailed evidence in respect of how an 80 home scheme might be successfully delivered; however, on balance, this is a reasonable option to test.
- 5.28 In conclusion, on the basis of the discussion above (i.e. all of Section 5, read as a whole), there are two reasonable housing growth scenarios for assessment:
- **Scenario 1** – Given/assumed/constant sources of supply plus **Site 853a**
 - **Scenario 2** – Given/assumed/constant sources of supply plus **Site New 1** and additional housing at **Site 1117** and **Site C**.

6. Scenarios assessment

Introduction

6.1 The aim of this section is to present assessment findings in relation to the two housing growth scenarios introduced above, and set out in Table 6.1.

*Table 6.1: The reasonable housing growth scenarios
N.B. figures are for the Local Plan period (2011-2035)*

Supply	Scenario 1	Scenario 2
Completions and commitments (including supply from existing JHHNP allocations that can safely be rolled forward)	1,216	
Additional housing at existing allocation Site 5 (Fairmile)		12
Additional housing at existing allocation Site E (Stuart Turner)		20
Allocation of Site 2 (Chiltern Centre)		3
Allocation of Site 853a (Highlands Northern Field)	110	
Allocation of Site New 1 (North of Crossways, Shiplake)		20
Additional housing at existing allocation Site 1117 (Wyevale)		11
Additional housing at existing allocation Site C (Gillotts School)		30
Total supply 2011-2035	1361	1312
% above SODC Local Plan Policy H3 requirement (1,285)	6%	2%

Assessment findings

6.2 Table 6.1 presents assessment findings in relation to the five scenarios.

6.3 With regards to methodology

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 scenario in terms of 'significant effects' on the baseline (using **red**, **amber** and **light green** and **dark green**)¹¹ 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).

The appraisal matrix is followed by a discussion, setting out reasons for the appraisal conclusions reached, with reference to available evidence.

¹¹ Red indicates a significant negative effect; amber a negative effect that is of limited or uncertain significance; light green a positive effect that is of limited or uncertain significance; and dark green a significant positive effect. No colour is assigned where effects are considered to be neutral or uncertain.

Table 6.1: Housing growth scenarios assessment

Topic	Scenario 1 Highlands Farm Northern Field	Scenario 2 Lower Shiplake Gillotts School
Air quality	★1	2
Biodiversity	★1	2
Climate change	=	=
Health	=	=
Historic environment	=	=
Landscape	2	★1
Land, soil & water resources	2	★1
Population & community	★1	2
Transportation	★1	2

Discussion

The assessment shows a mixed picture, with each of the scenarios associated with pros and cons. Scenario 1 is best-performing in respect of the most topics (four versus two); however, it does not automatically follow that Scenario 1 is best-performing overall, as the topics are not assumed to be of equal importance (also, there is a degree of double counting of issues in respect of air quality and transport). It is for the decision-maker (also consultees), not this assessment, to assign weight to the various pros and cons and then arrive at a conclusion on which scenario is best-performing overall. For example, the view might be taken that particular weight must be placed on avoiding impacts to the AONB, which could lead to a conclusion that Scenario 2 is best-performing overall.

The following bullet points explore the growth scenarios under the SEA framework:

- **Air quality** – is a key issue in Henley, given the town centre AQMA. None of the sites that are a particular focus of this assessment (namely those that are a variable across the scenarios; see Table 6.1) perform well, in terms of minimising the need to travel and supporting modal shift away from the private car; however, it is fair to conclude that Highlands Farm Northern Field (Scenario 1) performs *relatively* well, particularly as it is located at Henley (rather than Lower Shiplake) and on a bus route. This southwestern extent of Henley does benefit from a primary school, secondary school, leisure centre and a local centre (Greys Road) within walking distance, and there is fairly good potential to walk/cycle to the town centre (e.g. along Greys Road), albeit at a distance of over 2km. Also, as a larger site, there could also be relatively good potential to deliver high quality electric vehicle charging infrastructure. There is much less community infrastructure at the northern extent of Lower Shiplake, and the A4155 is notable for lacking a footpath and potentially not being an attractive route for cycling, albeit there is a good bus service (including to Reading) and Shiplake station is within 800m (albeit the potential for a safe walking route from Site New 1 is not clear). Residents would also be in proximity to an A-road, although there would be the potential to set new homes back from the road.

In **conclusion**, Scenario 1 is judged to be preferable, although there is uncertainty. With regards to significant negative effects, it is appropriate to take a precautionary approach and 'flag' a risk of significant negative effects under both scenarios, having taken account of the total quantum of recent/committed/proposed growth at Henley (i.e. in addition to the handful of sites that are a variable across the scenarios), albeit there is high uncertainty, in the absence of detailed technical evidence, e.g. modelling.

- **Biodiversity** – there are fairly limited sensitivities associated with the sites that are a variable across the growth scenarios. With regards to nationally designated SSSIs,¹² there is a general concern regarding encroachment of Lower Shiplake towards Harpsden Wood SSSI, noting the extent of priority habitat and TPOs between the SSSI and the settlement edge (including TPOs at the edge of both sites in question here), which serves to suggest a need to plan strategically for any expansion of Lower Shiplake in this broad area. However, it difficult to suggest that 31 homes at the two sites in question (mindful of recent and committed growth in this area, but also mindful that Site 1117 is committed, with the current 'option' being to deliver housing in place of employment) gives rise to a significant concern. With regards to the two sites in question at the southwestern extent of Henley, it appears that the Gillotts School site is subject to greater constraint, noting that the land in question formerly comprised the landscaped grounds of Gillotts House (see old [maps](#)), which (presumably) has resulted in areas of woodland priority habitat and TPOs around the edge of the site, including a small copse at the northeast extent of the site, at the point where access would be achieved. There is a concern that a higher density scheme would lead to added pressure on these mature trees / areas of habitat.

In **conclusion**, Scenario 1 is judged to be preferable, although this is somewhat marginal. With regards to significant effects, it is not possible to conclude that either scenario would result in significant effects. One of the sites proposed for additional housing that is a constant across the scenarios (Site 5) gives rise to a degree of concern; however, the overall conclusion is that biodiversity concerns are fairly limited.

- **Climate change** – beginning with the matter of climate change **adaptation**, the key consideration is flood risk, which is clearly an important matter for Henley, Harpsden and Lower Shiplake; however, none of the sites in question are subject to significant constraint, with the only issue being a modest area of surface water flood risk at the eastern extent of the Gillotts School site (including at the point of access), according to the nationally available [dataset](#). With regards to climate change **mitigation**, the key issue is likely to be transport emissions, which comes down to the matters discussed above under Air quality. With regards to emissions from the built environment, larger schemes can lead to greater potential to achieve emissions standards that go beyond the requirements of Building Regulations; however, there is little reason to suggest that this is a significant consideration for the sites in question. As something of an aside, heat network options could feasibly be explored as part of efforts to plan strategically for growth at the southwestern extent of Henley, given the potential to link to a range of users, including the secondary school and leisure centre (with a 25m heated pool).

In **conclusion**, the scenarios are judged to perform broadly on a par. Greenhouse gas emissions from transport are potentially the key consideration, but matters are broadly as *per* the discussion above under Air quality.

- **Health** – a primary consideration is that Highlands Farm Northern Field (Scenario 1) has been identified as a location suited to accommodating a relocated Chilterns Centre. Scenario 1 also performs well in that new residents would have good access to a leisure centre, as well as reasonable access to a GP surgery (there is no GP surgery at Lower Shiplake). Further considerations relate to access to greenspace and the countryside, but it is difficult to confidently differentiate the scenarios in these respects (all of the sites certainly have good countryside access). A final consideration is support for active travel (walking and cycling), but this matter is a focus of discussion above, under air quality.

¹² There is no data is available to show the location of local wildlife sites (see SODC Local Plan Policy Env 2); for example, these are not shown on the Local Plan Policy Map, nor at the SODC interactive mapping [website](#).

In **conclusion**, Scenario 1 is notably preferable. With regards to significant effects, there is an argument to suggest that supporting the Chilterns Centre leads to significant benefits under Scenario 1; however, there could feasibly be other potential locations.

- **Historic environment** – leaving aside archaeology (which is discussed separately below), there are fairly limited sensitivities associated with the sites that are a variable across the growth scenarios. Site 1117 is particularly low constraint, recalling that it is a committed site for 40 homes plus employment. With regards to the other site at Lower Shiplake (New 1), there is potentially a concern regarding impacts to the rural setting of the grade 2 listed war memorial ~100m to the south, but the significance of any impact is far from clear. With regards to the two sites at the southwestern extent of Henley, it seems likely that the Gillotts School site is subject to greater constraint, given its location between the Henley urban edge and the valued Harpsden Valley to the south (also noting likely remnant historic garden/parkland features, discussed above, under Biodiversity); however, it seems unlikely that the site is visible from the footpaths that link Henley to the valley, and it is difficult to envisage any significant impact to the setting of the grade 2 listed Old Rectory at Harpsden Bottom.

Finally, with regards to archaeology, there is limited evidence (it has not been possible to interrogate the Historic Environment Record); however, there is a scheduled monument at Highlands Farm, known as Highlands Farm Palaeolithic site, associated with the gravel deposits of an ancient channel of the Thames, and that the same geology also likely extends to the Gillotts School site. There are no scheduled monuments in the vicinity of Lower Shiplake; however, it is generally the case that the Thames and its floodplain, typically with relatively easily farmed soils, supported early settlement (e.g. there is a major cluster of scheduled monuments at Charvil, not far to the south).

In **conclusion**, Highlands Farm North (Scenario 1) is associated with archaeological constraint, but limited constraint in other respects. It is typically possible to address archaeology through the development management process; however, taking a precautionary approach, it is judged appropriate to rank the alternatives on a par. The views of Historic England will be sought through the consultation.

- **Landscape** – is a key issue for this current assessment, with an overriding consideration being the location of Highlands Farm North within the Chilterns AONB. There are views of the site from Greys Road and two footpaths that link Henley to the Chilterns Way; however, the land is notably flat, and there is understood to be good potential to mitigate impacts through masterplanning, screening and landscaping. Also, and importantly, the SODC [Landscape Capacity Assessment](#) (2017) supports a focus of growth here. With regards to the Gillotts School site, a higher density scheme does give rise to concerns, for the reasons discussed above, under Biodiversity and Heritage. As something of an aside, and generally speaking, there is a need for strategic planning for the southwestern extent of Henley, with a view to securing a strong relationship between Henley, the Harpsden Valley and raised land of the AONB in perpetuity, avoiding piecemeal growth, and the issues and missed opportunities that come with it. Turning to the two sites at Lower Shiplake, Site 1117 gives rise to limited concerns given that it is already committed for 40 homes plus employment (the current 'option' is to replace the employment with housing), although there is an important adjacent sensitivity, in the form of the Chilterns Way long-distance footpath. With regards to Site New 1, the site is quite well contained by field boundaries, but could contribute to a valued sense of urban/rural transition at the edge of Lower Shiplake (noting the committed Thames Farm to the north, which is currently under construction), primarily as experienced by motorists. Again, there is a clear argument for taking a strategic approach to any expansion of the village in this direction, with a view to respecting the low density built form (e.g. see discussion within the Shiplake Villages [Character Appraisal](#)), the Chilterns Way and generally the sensitivities associated with land rising towards Harpsden Woods and the AONB.

In **conclusion**, it is appropriate to predict significant negative effects under Scenario 1, simply on the basis of the AONB issue (the views of the AONB Unit will be sought through the consultation). There are also notable concerns under Scenario 2.

- **Land, soil & water resources** – it is fair to highlight Scenario 2 as preferable, as the effect would be to support higher density housing schemes (albeit the effect at Site 1117 would be to displace employment, which could feasibly lead to pressure for employment land at greenfield locations elsewhere). With regards to agricultural land quality, no land in the study area has been surveyed in detail (see the Post 1988 agricultural land classification dataset at magic.gov.uk), but the low resolution nationally available dataset suggests a likelihood of better quality, grade 2 agricultural land at the western edge of Lower Shiplake (Site New 1; albeit this is a fairly small field, potentially of limited suitability for agricultural uses). A further consideration is drainage, which is understood to be an issue at Lower Shiplake (this is covered by a number of recent articles within the Henley Standard, for example an [article](#) from July 2021); however, it is not possible to conclude that the addition of 31 further homes would lead to any significant issue.

In **conclusion**, taking a precautionary approach, it is fair to highlight a modest negative effect under both scenarios on account of the likely or potential loss of ‘best and most versatile’ agricultural land, although the amount of land in question is clearly modest.

- **Population & community** – the primary consideration is meeting housing needs at Henley, in particular affordable housing needs. On this basis, there is a clear preference for Scenario 1, which would meet and exceed/buffer the housing requirement set by the SODC Local Plan, albeit there would still likely be significant unmet affordable housing needs (see discussion above, at paragraph 5.6). The Highlands Farm Northern Field site should certainly be able to deliver the requisite 40% affordable housing, and is not thought likely to be associated with significant delivery risks/issues. Under Scenario 2, there would be fewer homes in total, and there could feasibly be a degree of delivery risk associated with one or more of the three sites that are a focus of consideration here, albeit there is no certainty in this respect. Equally, there could be a risk of not delivering 40% affordable housing at one or more of the sites, although again there is no certainty. Perhaps more importantly, under Scenario 2 homes would be directed to Lower Shiplake at the expense of homes directed to Henley, which is not supported from a perspective of meeting housing needs close to where they arise. There is clearly significant recently delivered and committed housing at Lower Shiplake, and it is important to note that the Draft Shiplake Villages Neighbourhood Plan (2020) set out the following as a Core Objective: *“Conserve and enhance the essential rural character of the parish and its villages by growing the villages through small infill developments and individual houses that will form part of the established pattern of development, allowing the villages to grow organically. preventing further creep or elongation of the villages into the open countryside or the villages’ green spaces is a fundamental aim of the new plan.”*

Aside from matters relating to housing, there are clearly wide-ranging further ‘population and community’ issues and opportunities associated with the housing growth strategy for Henley and Harpsden; however, most have already been discussed, above. A key matter relates to the potential to deliver new community infrastructure and/or employment land alongside new housing at Highfield Farm Northern Field (Scenario 1), and it is important to consider the loss of employment land at Site 1117 under Scenario 2. A further consideration is that a higher density scheme at the Gillotts School site would lead to additional funds for renovation of the school. Finally, it is again important to reiterate the importance of strategic planning for expansion of Henley, including from a perspective of securing community infrastructure (including upgrades to Gillotts School).

In **conclusion**, Scenario 1 leads to a prediction of moderate significant positive effects. Scenario 2 performs much less well, although would lead to funds for the school.

- **Transport** – key issues around minimising the need to travel, supporting modal shift away from the private car and supporting safe walking/cycling are discussed above. With regards to safe vehicular access and traffic considerations, none of the sites are known to be associated with major issues, but the Gillotts School site would clearly lead to issues with traffic along a residential road (Blandy Road) to some extent.

In **conclusion**, Scenario 1 is preferable, but only in respect of matters already discussed under other headings, i.e. it is recognised that there is an element of double counting.

7. The preferred approach

Introduction

7.1 The aim of this section is to present the plan-makers reasons for supporting the preferred approach, in light of the scenarios assessment presented above.

Reasons for supporting the preferred approach

7.2 The plan-makers responded to the assessment as follows:

“The preferred approach is to take forward Scenario 1 as the basis for the Revised JHHNP. This approach is considered to broadly align with the findings of the assessment, which finds Scenario 1 to perform well in terms of the majority of key sustainability issues, both in absolute terms and relative terms.

It is recognised that the AONB designation is a constraint to growth at Highlands Farm Northern Field. However, the SODC [Landscape Capacity Assessment](#) (2017) serves to indicate limited landscape sensitivity, and there will be good potential to take steps at the development management stage to mitigate landscape impacts, guided by policy set out in the Revised JHHNP.

With regards to Scenario 2, the assessment highlights a range of drawbacks, including on the basis that growth would be directed to the edge of Lower Shiplake rather than the edge of Henley. It is recognised that further scenarios could feasibly be explored that would involve focusing growth solely at the edge of Henley; however, all such scenarios are judged to be ‘unreasonable’ on the basis of the discussion set out in Section 5 of this report.

The process of defining and assessing growth scenarios serves to highlight that there are no easy choices, in respect of planning for growth at Henley. Nonetheless there is a need to make a choice, and the Committee views Scenario 1 as best representing sustainable development on balance. Importantly, the preferred approach will deliver benefits to the Neighbourhood Area and meet the requirements set out in the Local Plan.”

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

8. Introduction (to Part 2)

- 8.1 The aim of this section is to present an assessment of the current ‘pre-submission’ version of the Revised JHHNP.
- 8.2 The Revised HHNP puts forward 29 policies to guide development in the Neighbourhood Plan area. These are set out in Table 8.1 below.

Table 8.1 Revised HHNP policies

Policy no.	Title
ENV1	Air Quality
ENV2	Biodiversity
ENV3	Trees
ENV4	Local Green Spaces
ENV5	Watercourses
SD1	Minimising Carbon Emissions
SD1a	Fabric First Approach
SD1b	Other Methods
SD2	Community Energy Projects
SD3	Local Character
H1	Design Brief
H2	Affordable Housing
H3	Housing Type and Mix
H4	Infill and Self-Build Dwellings
E1	Supporting Henley’s Economy
E2	Henley Town Centre
E3	Market Place Hub
E4	Employment and Residential above Shops
T1	Impact of Development on the Transport Network
T2	Active Travel
T3	Easing Congestion
T4	EV Charging Points
T5	Public Transport
T6	Parking and Standards
SCI1	Comprehensive Renewal of Gillotts School
SCI2	Renewal and Enhancement of Community Facilities
SCI3	Community Right to Build
SCI4	Henley College
Policy DS1	Proposed Allocations

Methodology

- 8.3 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.
- 8.4 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.
- 8.5 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 Revised HHNP 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 Revised JHHNP

Introduction

- 9.1 The assessment is presented below under nine topic headings, reflecting the established assessment framework (see Section 3). A final section (Chapter 10) then presents overall conclusions.

Air quality

- 9.2 Air quality is a concern for the town, being raised through the Neighbourhood Plan Survey as a key issue, particularly in relation to air pollution and vibration from Heavy Goods Vehicles. The Henley AQMA exceeds air quality standards in terms of nitrogen dioxide (NO₂), comprising a busy road network (predominately between New Street and Station Road) with some relatively narrow streets which serve to prevent the dispersion of pollutants, in turn trapping the pollution at street level.
- 9.3 New housing and employment provision proposed through the Revised JHHNP has the potential to negatively impact air quality through increasing traffic flows and associated pollutants, including NO₂, particularly within the AQMA given its high sensitivity to such impacts. Most of the allocations in the Plan are rolled over from the made Plan, with an additional 113 homes allocated across two new sites; the new Chilterns Centre site (Site Y) and the Northern Field at Highlands Farm site (Site M1). This will ultimately add to the cumulative pressures on air quality in the Plan area.

- 9.4 The Revised JHHNP therefore seeks to supplement the Local Plan policy framework and wider evidence base, requiring through Policy ENV1 (Air Quality) that *“in addition to meeting the assessment and mitigation policies in the Local Plan, Air Quality Action Plan and SODC Air Quality Developer’s Guidance, all Major development and substantial refurbishment must be designed to minimise harmful emissions to air”*. Specifically, *Policy ENV1 states that “development must aim to demonstrate that it is ‘air quality neutral’”*, supporting innovative transport solutions and opportunities to improve air quality or mitigate impacts. These measures will apply to the larger new site north of Highlands Farm which is allocated for 110 homes (and classed as major development) and reduce the cumulative effects of development in the town. However, the site is allocated at the urban edge, where a level of self-containment will be crucial in combatting the distance to town centre services and facilities (and reducing reliance on cars in this respect). But with this said, there are a notable range of accessible services and facilities along Greys Road, including schools.
- 9.5 The site-specific Policy (Policy DS7) seeks new employment land development at the site alongside housing which will contribute to bolstering active travel to work. Furthermore, the site will also provide for the relocation of the Chilterns Centre. Thus, the intention is to develop a degree of self-containment at the site, supported by wider services and facilities along Greys Road.
- 9.6 As discussed below under the Biodiversity SEA theme, the Habitat Regulations Assessment (HRA) Appropriate Assessment (AA) for the Local Plan (2012) identified that housing allocations for Henley are within the 17km buffer for the Hartslock Wood, Chiltern Beechwoods and Aston Rowant Special Areas of Conservation (SAC’s). However, the HRA AA concluded for all three SACs that *“there is no risk of a significant effect arising from air pollution”*.
- 9.7 The wider Revised JHHNP policy framework also provides an opportunity to improve public realm and the movement of pedestrians; notably protecting and enhancing the area’s most valued open spaces and improving connectivity through policies ENV2 - 4. Policy ENV3 (Trees) identifies woodland as a key component of the local green infrastructure network that should be given some form of protection. Careful management of street trees is essential to preserve the character of many streets in Henley, to help to control air pollution and to provide visual amenity, supporting scenic routes and active travel opportunities. This is anticipated to lead to minor indirect positive effects for air quality.
- 9.8 Policy T4 (EV Charging Points) supports a modal shift away from high emission vehicles. Policy T4 states that *“Proposals for development should include, where practicable, appropriate provision for electric vehicle charging points taking account of best practice.”* Requiring new development to deliver electric vehicle charging points will contribute positively towards delivering the Oxfordshire Electric Vehicle Infrastructure Strategy (2020-2025) and meeting national and local climate commitments. Furthermore, it is noted that a ban on selling new petrol, diesel or hybrid cars in the UK will be brought forward from 2040 to 2035 at the latest, under government plans.¹³ Policy T5 (Public Transport) protects existing assets that support more sustainable travel and movement, and requires appropriate contributions from development towards

¹³ Department for Transport and Office for Low Emission Vehicles (2020) Consultation on ending the sale of new petrol, diesel and hybrid cars and vans [online] available at: <<https://www.gov.uk/government/consultations/consulting-on-ending-the-sale-of-new-petrol-diesel-and-hybrid-cars-and-vans>> last accessed [23/03/20]

bus services (facilitating additional stops where necessary). Furthermore, the policy encourages improvements to the quality of public transport services to make them safer, more attractive, and convenient for users.

- 9.9 Policy T6 (Parking and Standards) seeks to ensure adequate vehicle parking facilities and cycling parking are provided by the developer to serve the needs of any proposed development. Notably, *“Vehicle and cycle parking should be integrated as a key element of design in development layouts to ensure good quality, safe, secure and attractive environments”*. This has the potential to lead to minor long-term positive effects, securing safe access to the town centre for residents and visitors, and address existing capacity issues at peak times. In addition to reducing congestion levels, limiting the need for on-street parking will likely improve road safety, which may support increased levels of active travel within and around the town.
- 9.10 In light of the climate emergency declared in 2019, a number of projects in the plan area have been undertaken to improve air quality locally, for example supporting active travel uptake and car-share in the town.
- 9.11 Overall whilst cumulative pressures for air quality are anticipated through the proposed spatial strategy, the policy framework seeks to reduce these pressures, including through plans for ‘air quality neutral’ development at larger sites. Emphasis is placed on the accessibility of future growth and futureproofing through electric vehicle charging infrastructure. Furthermore, the town is served by a train station to bolster sustainable transport access. As a result, it is considered likely that significant effects will be avoided, and **minor negative effects** are considered likely overall (as there will no doubt be an element of increased car usage in future growth). The significance of effects could reduce in the longer term, recognising the anticipated switch-over to electric vehicles.

Biodiversity

- 9.12 There are no European protected sites for biodiversity located within the Neighbourhood Plan area, however the Neighbourhood Plan area falls within the 17km consultation zone for potential impacts on Hartslock Wood, Chiltern Beechwoods and Aston Rowant Special Areas of Conservation (SACs). The 17km buffer has been used as this takes account of where the likely impacts of development will arise, taking into consideration (for example) the average travel to work distance for South Oxfordshire, and average travel time/ distance for Accessible Natural Greenspace, which would include access to the SAC’s.¹⁴
- 9.13 The Habitats Regulations Assessment (HRA) Appropriate Assessment (AA) carried out for the Local Plan (2012) identified the strategy for Henley (Policy CSHEN1) as having the potential for negative impacts on Hartslock Wood, Chiltern Beechwoods and Aston Rowant SAC’s through increased visitor pressure as a result of population growth. The HRA AA for the Local Plan 2034 (2019) concluded that Policy H3 (Housing in the Towns of Henley-on-Thames, Thame and Wallingford) could have significant effects on Little Wittenham SAC only. The AA (2019) concluded that adverse effects on integrity are unlikely to occur due to a number of factors. These include the limited sensitivity of the site’s qualifying feature, being its great crested newt population, and suitable

¹⁴ South Oxfordshire Core Strategy Habitats Regulations Assessment Appropriate Assessment (2012) [online] available at: https://www.southoxon.gov.uk/wp-content/uploads/sites/2/2019/01/Appropriate-Assessment_2.pdf

existing and planned future management of Little Wittenham SAC. In addition, Local Plan Policies ENV5 (Green Infrastructure in new developments) and CF5 (Open Space, Sport and Recreation in new residential development) should help to divert visits to Little Wittenham SAC. New development in the Neighbourhood Plan area is therefore not considered likely to lead to adverse effects on European designated sites.

- 9.14 In terms of nationally designated sites, there are three Sites of Special Scientific Interest (SSSIs) that fall within the Neighbourhood Plan area; Harpsden Wood SSSI, Highlands Farm Pit SSSI, and Lambridge Wood SSSI. In terms of the site allocations, new site 'Northern Field at Highlands Farm' is located adjacent to Highlands Farm Pit SSSI, designated for its geological interest. Policy DS7 (Northern Field at Highlands Farm (Site M1)) seeks to limit potential effects on the designated site, requiring that proposals (through the Design Brief (Policy H1) "*protect and enhance the SSSI*", and that this is achieved "*through a geological survey [...] to help inform the design of the site*". *The requirements of Policy DS7 alongside the wider policy framework, including Policy H1, will likely ensure the proposal will avoid any harmful effects on the SSSI. Furthermore, requirements for the Design Brief include demonstrating how the proposed development "incorporates and reinforces or re-provides the existing landscaping; Green Infrastructure; and biodiversity features, particularly along the sites northern, southern and western boundary edges*". This will likely promote ecological connectivity at a strategic scale delivering minor positive effects, in accordance with Neighbourhood Plan policy ENV2 (Biodiversity).
- 9.15 The new allocation site at Chilterns Centre (Site Y) is not known to be significantly constrained in relation to biodiversity. Any biodiversity improvements should be considered in conjunction with development at the adjacent Chiltern's End site (Site F) to maximise potential benefits and ecological connectivity.
- 9.16 It is noted that the remaining six of the RJHHNP site allocations have already been allocated for residential development in the current adopted JHHNP but have not yet been developed. These six sites have been accepted in principal as locations for further growth through the adopted JHHNP, with effects considered through the previous plan-making process). Notably, the rolled over development sites will intersect priority habitats at both the Land West of Fair Mile and to a lesser extent at Gillott's School, and minor negative effects could be anticipated in this respect. The allocation policy (DS2) seeks a "*high-quality green link and biodiversity environment, including any existing on site biodiversity features*" to combat these effects.
- 9.17 More broadly, and as touched upon above, local biodiversity assets are protected and enhanced through the Revised JHHNP policies which seek to maintain and where possible enhance the highly valued, natural environment. Specifically, development is encouraged through Policy ENV2 (Biodiversity) where it "*identifies the local biodiversity and seeks to protect or enhance it through the creation of new wildlife areas or corridors*".
- 9.18 Notably, the Neighbourhood Plan area includes areas of Ancient Woodland and priority habitats which all contribute to the green infrastructure networks extending throughout the town and wider area. All woodland in Henley and Harpsden is given protection through Policy ENV3 (Trees) and Policy ENV4

(Local Green Spaces); with many Local Green Spaces identified for their local significance and richness of wildlife. Lucy's Farm woodland, Gillotts Wood, Parkside Wood, Sarah's Wood, Henley College Wood, and many others will be afforded protection through the LGS designation (Policy ENV4); contributing positively towards the Revised JHHNP objective to *“protect and enhance urban and rural habitats of value [...] to foster greater ecological diversity.”*

- 9.19 Policy ENV3 seeks to ensure any potential adverse effects on assets through new development are avoided, with no residual net-loss in biodiversity, stating that *“where removal of a tree due to development is unavoidable all trees so removed must be replaced by appropriate species according to the emerging Henley Town Council Tree Strategy at a ratio of 3:1”*.
- 9.20 Overall, whilst minor negative effects are considered likely in implementation of the proposed spatial strategy, the policy mitigation provided seeks to reduce the extent of these effects, particularly through the protection of on-site features and the existing green infrastructure network. The promotion of enhanced green infrastructure links is also considered likely to benefit biodiversity. As a result, no significant deviations from the baseline are anticipated, and **broadly neutral effects** are concluded overall.

Climate change (mitigation and adaptation)

- 9.21 The NP recognises the role of the Local plan policy framework in seeking to minimise the carbon and energy impacts of the design and construction of new development, modification and extension, including works on historic buildings. Policies of note in this respect include DES8, DES10 and ENV6-8. Policy SD1 (Minimising Carbon Emissions) seek to add value to the Local Plan policy framework, recognising that it is vital that new development creates the smallest carbon footprint possible. Policy SD1a therefore encourages new development to minimise both embodied carbon during construction and operational carbon emissions by design, with specific emphasis placed on using a “Fabric First Approach”. Policy SD1b considers the local sensitivities of the area and provides specific encouragement for improving energy efficiency in both existing and new buildings, for example by using *“heat pumps”, “incorporating Solar photovoltaic panels on South or East/West facing roofs”, and “double glazing in Conservation Areas or secondary glazing in listed buildings with wooden windows that meet the latest relevant British standard”*.
- 9.22 Furthermore, as part of the town's carbon reduction strategy, Policy SD2 (Community Energy Projects) sets out support for community scale projects. This is in line with the NPPF (paragraph 156).
- 9.23 Policy SD3 (Local Character) states that proposals *“should demonstrate high quality, sustainable and inclusive design and architecture that respects the relevant Character Area, as demonstrated in the CAAMP.”* This will contribute positively towards meeting the NP objective of *“all new development contribut[ing] to lowering carbon emissions through good building design and enhancement of the natural environment.”*
- 9.24 In terms of the site allocations, a design brief must be produced for each site (Policy H1 (Design Brief)), and development must be implemented in accordance with the principles set out in the Design Brief. Of relevance to this

SEA theme, Policy H1 requires that the brief must consider *“Promotion of sustainable development and energy efficiency”*.

- 9.25 Positive effects are also considered through the requirement for Electric Vehicle charging points as part of new development (see discussion under Air Quality above).
- 9.26 In terms of climate change adaptation, part of the Plan area is prone to flooding, with areas at highest risk of fluvial and groundwater flooding located towards the eastern boundary, within proximity of the River Thames. No allocations are proposed within high or medium flood risk areas. While Local Plan policies EP4 and INF4 set requirements for the district, i.e. a site-specific Flood Risk Assessment (FRA) to be provided for all development in Flood Zones 2 and 3, and all development to provide a Drainage Strategy; it is recognised that the constraints are acute given the unique geological and location of Henley and Harpsden, In response, the Revised JHHNP Policy ENV5 (Watercourses) requires that *“development should have regard to the geology and drainage capacity of the site and the consideration of the watercourses map.”* This will raise awareness of the risks of flooding in the plan area, and the importance of early investigation of geology and drainage capacity of proposed development sites.
- 9.27 Policy ENV2 (Biodiversity) supports development where it *“incorporates planting which will be resilient to climate change”*, and encouraging tree and shrub planting that *“includes a clear planting plan demonstrating resilience to disease, pests and climate change that is consistent with the principles of Policy ENV3 (Trees)”*. In line with Policy ENV3, tree planting should be considered, *“in either individual gardens, or as a communal wooded area, or a combination of both”*. This will contribute positively towards delivering climate resilient growth in the plan area.
- 9.28 Well planned green infrastructure can help an area adapt to and manage the risks of climate change (including flood risk). Enabling and providing for green infrastructure within Henley and Harpsden is therefore a key way in which the Neighbourhood Plan can help to promote climate change adaptation measures. Environment policies (ENV1 - ENV4) and housing policy H1 (Design Brief) all perform positively in this respect. Multi-functional benefits likely to be delivered include assisting carbon sequestration and promoting walking and cycling through the attractive public realm.
- 9.29 Overall the avoidance of development within the floodplain, alongside the measures to increase climate resilience are considered for potential **minor long-term positive effects**.

Health and wellbeing

- 9.30 The health and wellbeing of residents will be supported by the Revised JHHNP policies which support a high-quality public realm, local distinctiveness and landscape/ townscape character. This has been discussed to some extent under the ‘Landscape’ and ‘Historic Environment’ SEA themes above. In this context maintaining and enhancing the attractiveness of the Neighbourhood Plan area will positively affect residents’ quality of life, contributing to the satisfaction of residents with their neighbourhood as a place to live.

- 9.31 Policies ENV1-5, SD3 and H1 are all noteworthy in this respect. Policy SD3 (Local Character) identifies nine Character Areas (as shown in the Conservation Area Appraisal), and requires that development “respect the design, use of materials and views identified in the Character Area”. Furthermore, “High quality materials should be used that respect the local setting and contribute positively to the particular Character Area or Conservation Area or the general surrounding area if outside of these designations”, supporting a high-quality living environment for people to live and work.
- 9.32 A high-quality living environment will also be supported through Policy ENV2-5, through protecting and enhancing the Plan area’s most valued open spaces and improving connectivity. The Local Community Survey responses reinforced that green spaces and biodiversity assets in Henley and Harpsden are very important in making it such a high-quality place, with respondents wanting to maximize green spaces, habitats, and biodiversity and provide connections between them. “Linking green spaces through green chains and corridors” is therefore a key objective for the Neighbourhood Plan, and is reflected through Policy ENV2 (Biodiversity) which sets out support for development where it “incorporates biodiversity features”. Notably this includes providing “tree and shrub planting, that where possible is visible in whole or part from the public realm to capture associated well-being benefits.”
- 9.33 Policy ENV3 (Trees) and Policy ENV4 (Local Green Spaces) will also support an attractive public realm, protecting and enhancing rural and urban habitats of value and encouraging greater ecological diversity across the Plan area. Notably Policy ENV3 supports the careful management of street trees to control air pollution and to provide visual amenity. This supports Policy ENV1 (Air Quality) which goes beyond Local Plan policy requirements to ensure “air quality neutral” development. The NP recognises that growing road traffic levels risk a deterioration in quality of life for residents, for example due to noise, a less safe walking and cycling environment, and associated impact on community life. Policy ENV1 therefore states that “*Development should not damage health by increasing emissions of harmful pollutants*”, and in terms of redevelopment, “*should aim to be less polluting than existing development that it will replace.*” This is supplemented by Policy T3 (Easing Congestion), with further discussion presented under the Transportation SEA theme below. The Town Council seek to work with OCC and SODC to improve the public realm to provide an environment to help ease congestion and support healthy lifestyles.
- 9.34 Sustainable movement is therefore a key consideration for development in the Plan area, specifically supporting access to public transport opportunities and encouraging active travel uptake. There is little to add to the discussion set out under the ‘Transportation’ SEA theme below, although it is noted that the large new allocation site (Northern Field at Highlands Farms) whilst further from the town centre is supported by the provisions along Greys Road, including school access. Development at the site is further anticipated to deliver new employment opportunities to bolster active travel to work.
- 9.35 For all sites, a design brief must be produced for (Policy H1 (Design Brief)), and development must be implemented in accordance with the principles set out in the Design Brief. Of relevance to this SEA theme, Policy H1 requires that the brief must consider: “*Location, type and management of open space and recreation facilities*”.

- 9.36 As discussed above under the ‘Population and Community’ SEA theme above, it is considered that the Revised JHHNP will support health indicators relating to housing by providing high-quality new homes that meet identified local housing needs. The supporting text of Policy H3 (Housing Type and Mix) identifies the current housing need based on the Housing Needs Assessment (HNA) and South Oxfordshire evidence, with Policy H3 stating that *“a mix of dwelling types and sizes to meet the needs of current and future households will be sought on all new residential developments as illustrated through the most up to date housing needs assessment.”* This flexible policy approach seeks to ensure that future development proposals are able to respond to the housing needs at that point in time.
- 9.37 Overall, the proposed spatial strategy and policy provisions seek to protect resident health and wellbeing, deliver connected development, maintain relatively low levels of deprivations and promote more active travel opportunities. As a result, **minor long-term positive effects** are anticipated.

Historic environment

- 9.38 With a wealth of historic environment assets which are recognised as key contributors to the attractiveness of Henley and Harpsden (including its tourism attraction), future growth in the Plan area has high potential to affect the setting and significance of assets.
- 9.39 The growth strategy rolls forward allocations from the made JHHNP for which the premise of development has previously been found sound in principle. Notably the Land West of Fair Mile and the Empstead Works/ Stuart Turner site are located near to Listed Buildings with the Land West of Fair Mile located partially within the Conservation Area.
- 9.40 There are also notable constraints to development at the Northern Field at Highlands Farm (Site M1), with a scheduled monument known as ‘Highlands Farm Palaeolithic site’ associated with the gravel deposits of an ancient channel of the Thames. This same geology also likely extends to the Gillott’s School site (Site C).
- 9.41 The site allocation policies reiterate the need for development to respond to the heritage context, including as part of the Conservation Area at the Land West of Fair Mile. Here, development *“should include a sensitive and contextual approach to its density, design and use of materials”* promoting low densities within the Conservation Area. The development brief for Empstead Works/ Stuart Turner under Policy DS4 is also required to demonstrate how the proposed development responds to the surrounding conservation area.
- 9.42 With regards to the archaeological constraints identified at Site M1, the allocation Policy DS7 requires development to protect and enhance the Scheduled Monument and its setting, including through the inclusion of a geological survey as part of the development brief for the site.
- 9.43 Similarly, at the Gillotts School Field site under Policy DS3, development is expected to avoid harm to any heritage assets *“through a predetermination archaeological assessment”*.
- 9.44 A primary plan objective is *“to conserve and enhance the unique historic and natural environment assets of the area which make an important contribution to*

the quality of new development, the economy and social infrastructure of the town and village whilst increasing their energy efficiency". Further the Plan outlines that Henley is a heritage asset in its own right with the extent of the designated conservation area. The cumulative effects of growth on the conservation could also have negative implications, particularly as a result of increased traffic and congestion. The Plan seeks to combat this through connected development that provides for active travel and access to more sustainable transport modes (see discussion under the climate change and transportation themes).

- 9.45 The Revised JHHNP recognises that the SODC Local Plan provides Policies ENV6-8 covering development that affects the historic environment but aims to further recognise the need for sensitive retrofitting of energy efficiency measures in line with climate change objectives. This is outlined through Policy SD1b (Minimising Carbon Emissions – Other Methods) but with the overall recognition that such development would not detract from historic characteristics.
- 9.46 Policy SD3 (Local Character) seeks to ensure that proposals for new development or redevelopment responds to local character, materials and colour palette, corresponding to the SODC Design Guide and the Supplementary Technical Notes on local building materials. Proposals should *"respect the relevant Character Area, as demonstrated in the CAAMP"*, "having regard to the character of adjacent buildings and spaces, including scale, orientation, height and massing". In terms of the site allocations, a design brief must be produced for each site (Policy H1 (Design Brief)), and development must be implemented in accordance with the principles set out in the Design Brief. Of relevance, Policy H1 requires that the brief must consider the following:
- *"Management, impact and mitigation of views, vistas and adjacencies;*
 - *Building use, scale, height, density and massing;*
 - *Materials palette; and*
 - *How the development responds to local character."*
- 9.47 Overall the potential for **negative effects of significance** are recognised, namely through the allocation of the Northern Field at Highlands Farm (and associated effects in relation to the Scheduled Monument on site). Minor negative effects are also anticipated from growth within the Conservation Area and the cumulative effects of increased traffic and congestion within the Conservation Area. Whilst the policy framework seeks to provide adequate mitigation, it is recognised that detailed design schemes are required to fully assess and address the potential impacts on site.

Landscape

- 9.48 The Neighbourhood Plan area is located partially within the Chilterns Area of Outstanding Natural Beauty. Notably this includes a large area in the south-west of the Neighbourhood Plan area, as well as its most northerly and westerly parts. The only areas of the Neighbourhood Plan area that are not within the AONB are the more urbanised areas of Henley-on-Thames town centre and a small area to its south-east.

- 9.49 In terms of the site allocations, a design brief must be produced for each site (Policy H1 (Design Brief)), and development must be implemented in accordance with the principles set out in the Design Brief. Of relevance to this SEA theme, Policy H1 requires that the brief must consider the following:
- Location, type and management of landscaping;
 - Management, impact and mitigation of views, vistas and adjacencies; and
 - How the development responds to local character.
- 9.50 Most of the proposed allocations sites are rolled over from the made Plan (but not built out yet) where the principle of development has been previously found sound. They are also predominantly within the existing settlement area. Despite this, there is notably an aspect of development within the setting of the AONB, particularly at the Land West of Fair Mile (Site A1), Gillott's School Field (Site C), and Chiltern's End (Site F). This is compounded by the two new allocations, particularly at the Northern Field at Highlands Farm (Site M1) located wholly within the AONB, and at the Chiltern's Centre (Site Y) adjacent to Chiltern's End (and in the setting of the AONB). The scheme at Chiltern's Centre (Site Y) only comprises 3 dwellings within previously developed land. As a result, development at this site is not likely to lead to any effects of significance. The landscape impacts are primarily associated with development at the Highlands Farm (Northern Field) site (Site M1).
- 9.51 The additional land at Site M1 will be an extension to the approved development at Highlands Farm, and result in further greenfield loss in this area. This is mitigated to some degree when considering the adjacent development which provides more of the settlement edge and will ultimately change the landscape setting in this area as well as views from and to Site M1 from the south. However, the potential for negative effects of significance is noted. There are views of the site from Greys Road and two footpaths that link Henley to the Chilterns Way; however, the land is notably flat, and there is understood to be good potential to mitigate impacts through masterplanning, screening and landscaping. The site allocation policy (Policy DS7) requires the development brief for the site to demonstrate how development "*incorporates and reinforces or re-provides the existing landscaping, green infrastructure and biodiversity features, particularly along the sites northern, southern and western boundary edges*" and "*responds to the site's environmental and landscape context, including the AONB and visibility from the opposite side of the valley*". Furthermore, development is expected to ensure that it "*conserves and where possible enhances the landscape and scenic beauty of the AONB*", including through the undertaking of a Landscape and Visual Impact Assessment.
- 9.52 Policy SD3 (Local Character) seeks to address the impacts of the spatial strategy, recognising "*proposals for new development or the redevelopment of existing buildings should contribute towards the local distinctiveness of Henley and Harpsden*" responding to the relevant character areas outlined by the Conservation Area Appraisal and Management Plan. This will be particularly important to address the effects of increased densities at some of the sites (Sites A1 and J).
- 9.53 Wider protections for trees (Policy ENV3), Local Green Spaces (Policy ENV4) and watercourses (Policy ENV5) are considered likely to support positive effects, prioritising the protection and enhancement of the AONB through the

designation of green areas in the Plan area which contribute towards the AONB's special landscape character, features, and setting.

- 9.54 Overall, whilst policy mitigation is provided, it is recognised that the spatial strategy proposes significant development within the AONB, and the potential for **negative effects of significance** cannot be ruled out at this stage.

Land, soil and water resources

- 9.55 Predictive land quality^[1] surrounding the urban area suggests a moderate potential for high-quality (Best and Most Versatile (BMV)) agricultural land, with some smaller areas with a noted higher potential.
- 9.56 In terms of mineral resources, it is noted that Oxfordshire County Council are in the process of identifying site allocations appropriate to deliver against mineral resource and waste management needs in the period up to 2031. However, the adopted Core Strategy does not identify any Mineral Consultation Areas intersecting with the Plan area. As a result, potential impacts arising from future growth in the Plan area are considered likely to be avoided/ neutral.
- 9.57 Most of the allocations of the Revised JHHNP are rolled over from the made Plan (and have not been built out yet), which were ultimately found sound in principal through the previous planning process. This makes use of existing brownfield land, including at rolled over allocation Sites E (Empstead Works/ Stuart Turner) and X (Henley Youth Club). A new allocation is introduced on previously developed land (PDL) (Site Y: Chilterns Centre), and the intensification of development at the existing PDL site (Site J: 357 Reading Road) is also supported. Through the inclusion of brownfield development, the spatial strategy is considered for efficient land use and positive effects in this respect in relation to land and soil resources. An element of greenfield development is proposed, with a noted potential for loss of BMV agricultural land, particularly within the new allocation site 'Site M1: Northern Field at Highlands Farm'. The relatively large site is allocated for 110 homes just north of the existing development underway Highlands Farm. Negative effects are ultimately expected through the loss of greenfield (and potentially BMV), however, these are not considered likely to be significant cumulatively, and is more reflective of a lack of suitable brownfield alternatives.
- 9.58 The main watercourse flowing through the Plan area is the River Thames east of Henley, and water industries as well as urban and transport factors are noted 'reasons for not achieving good status' (RNAGs) in terms of the ecological and chemical quality of waterbodies. None of the proposed allocation sites intersect waterbodies, and none are located adjacent to the river or in closer proximity than the existing urban edge. Effects are therefore considered likely to predominantly relate to the outlined impacts of urban environments and road traffic as a result of cumulative growth in the Plan area. Measures are ultimately in place through both the NPPF and SODC Local Plan (e.g. Policy EP4 Flood Risk) to protect water quality, particularly through the requirement for sustainable drainage systems and a Drainage Strategy (Local Plan Policy EP4). The additional policy provisions for watercourses under Policy ENV5 in the Revised JHHNP further identify that development "should have regard to

^[1] Natural England (2017) 'Likelihood of Best and Most Versatile Agricultural Land – Strategic scale maps [online] available at: <http://publications.naturalengland.org.uk/category/5208993007403008>

the geology and drainage capacity of the site and the consideration of the catchment map”, providing enhanced support for water quality.

- 9.59 In terms of water supply, the Revised JHHNP seeks a slightly higher level of the growth than that planned for through the Local Plan in consultation with water companies. Despite this, the proposed increase is not to the extent that significant effects are likely or early discussions with water companies are deemed imperative.
- 9.60 Overall, **minor negative effects** are concluded in relation to land and soil resources as a result of the development of greenfield and potential BMV land in the Plan area, however it is recognised that this is reflective of a lack of suitable brownfield alternatives and the effects are not deemed likely to be significant cumulatively. Broadly **neutral effects** are considered likely in relation to water resources.

Population and community

- 9.61 The Local Plan spatial strategy (Policy STRAT1) “supports the roles of Henley-on-Thames, Thame and Wallingford by maintaining and improving the attractiveness of their town centres through measures that include environmental improvements and mixed-use developments and by providing new homes, jobs, services and infrastructure”. In accordance with Policy H3, *“The NDP, or review of the made NDP, for each town must explore opportunities to address local needs and provide allocations to meet or exceed minimum requirements.”* The minimum residual requirement set through Policy H3 for Henley is 115 homes.
- 9.62 The Revised JHHNP Policy DS1 (Proposed Allocations) seeks to deliver 377 homes over eight sites, six of which have already been allocated for residential development in the current made JHHNP but have not yet been developed. These six sites have been accepted in principal as locations for further growth through the made JHHNP, with effects considered through the previous plan-making process. New site allocations at the ‘Northern Field at Highlands Farm’ (110 homes) and ‘Chilterns Centre’ (three homes) alongside proposed density increases at rolled over allocations (Sites A1 and J) will meet and exceed the residual need outlined above, providing an element of flexibility (a buffer) in development. Significant long-term positive effects are anticipated in this respect.
- 9.63 The NP seeks to supplement Local Plan Policy H9 which sets the requirement for 40% affordable homes on all sites with a net gain of 10 or more dwellings. Revised JHHNP Policy H2 (Affordable Housing) states that “In addition to Policy H9 requirements [...] at least 25% of all affordable housing units delivered should be First Homes, discounted market sale units”. Policy H3 (Housing Type and Mix) takes a flexible policy approach to tenure split, to ensure that future development proposals, particularly allocated sites phased to the latter part of the Neighbourhood Plan period, are able to respond to the housing needs at that point in time. In line with Policy H3, the dwelling mix (types and sizes) will be sought on new developments *“as illustrated through the most up to date housing needs assessment.”* Policy H2 and H3 are considered to lead to long term positive effects against the population and community SEA objective, meeting the Revised JHHNP objective of *“delivering an appropriate range and mix of housing to help achieve a balanced community*

and in particular help meet the needs of those age and income groups who have difficulty finding homes in Henley.”

- 9.64 Infill and Self-build dwellings are also supported through Policy H4. This is an important element of the Government’s housing strategy, providing new homes and, in terms of self-build, can help get empty and redundant buildings back into productive use. Positive effects are therefore anticipated in the long term, maximising housing delivery to meet local needs.
- 9.65 In terms of the site allocations, a design brief must be produced for each site (Policy H1 (Design Brief)), and development must be implemented in accordance with the principles set out in the Design Brief. Of relevance to this SEA theme, Policy H1 requires that the brief must consider “Connecting walking and cycling routes” and “Location, type and management of open space and recreation facilities” which will support connected, walkable neighbourhoods particularly given its proximity to Henley town.
- 9.66 Looking specifically at the newly allocated sites, the Neighbourhood Plan sets out that the advantage of ‘Land at Highlands Farm’ coming forward rather than a number of smaller sites would be that it could deliver the quantum of development required and deliver a greater number of affordable housing required for the Neighbourhood Plan area. The site is allocated for 110 new homes, including the “provision of community led housing” alongside employment development and the relocation of Chilterns Centre (Policy DS7) to meet local needs as set out in the latest Housing Needs Assessment (HNA) and create accessible development.
- 9.67 Social infrastructure is also a key consideration for supporting communities, as reflected through Policy SCI2 (Renewal and Enhancement of Community Facilities), which supports the “renewal and enhancement” of important community services. Focus is further placed on education in Policy SCI1 (Comprehensive Renewal of Gillotts School) and Policy SCI4 (Henley College), recognising the importance of the School and College as assets for the town. Policy SCI1 and SCI4 set out support for their redevelopment/ renewal to meet the needs of children at the school, educational accommodation needs at the college, and to support the sustainable growth of the community as a whole.
- 9.68 The Local Plan identifies Henley-on-Thames as an important service centre, and ‘major town centre’ (Policy TC2) for nearby areas in South Oxfordshire and Berkshire. In line with Local Plan Policy HEN1 (The Strategy for Henley-on-Thames) the RJHHNP will:
- provide new, or enhanced community facilities that meet an identified need;
 - strengthen the retail offer within Henley Town Centre;
 - improve accessibility, car and cycle parking in the Town Centre, and pedestrian and cycle links; and
 - strengthen and improve the attraction of Henley-on-Thames for visitors and provide leisure opportunities.
- 9.69 Sustaining and strengthening Henley town centre is therefore a key objective of the Revised JHHNP, as reflected through Policy E2 (Henley Town Centre) which states that *“Proposals for new retail, leisure, hotel and office development should be located within the defined town centre boundary.”*

Furthermore, Policy E3 (Market Place Hub) sets criteria for future development in the Market Place, recognising the role of tourism in the centre. Policy E3 identifies appropriate opportunities for redevelopment within the Market Place area, including “Use Class A Food and Drink Uses”, “Market Stalls”, and “Secure Cycle Storage”. The strategy further rolls over the employment allocation at the Land at Newtown Road (Policy DS10) to deliver against B1 use class development needs. This will lead to long term positive effects, protecting and enhancing the offer within the town centre to support a vibrant and competitive local economy.

- 9.70 Policy E4 (Employment and Residential Above Shops) encourages, in line with NPPG (2021) “Residential and in particular employment uses above shops”. It is considered that if suitably located, complementary uses (i.e. employment and residential) can help to support the vitality of the town centre, to serve local residents and visitors alike. This will lead to positive effects in terms of addressing local employment needs, and subsequently supporting economic growth of the town. It is recognised that the town is constrained by the AONB and considerable heritage assets, which can be a constraint to a town’s economic vitality. However, an attractive local environment can also draw visitors to the environment, enabling the growth of the tourism sector locally. To this effect, Policy SD3 (Local Character) seeks to ensure that proposals for new development or redevelopment “*have regard to the character of adjacent buildings and spaces*” to ensure the town remains a desirable place to live, work and visit.
- 9.71 In terms of the wider employment offer, it is recognised through the Revised JHHNP that Henley provides a significant and important employment offer which needs to be retained and enhanced. Industrial and office activity will be concentrated at the Reading Road industrial estate which will be protected for employment as the “Neighbourhood Area’s main employment area” through Policy E1 (Supporting Henley’s Economy).
- 9.72 Overall, **significant long-term positive effects** are anticipated as a result of the growth strategy which includes an element of employment and retail development alongside housing growth and provides a buffer to better secure housing delivery.

Transportation

- 9.73 The NP area is connected to the strategic road network by the A4155 and the A4130. The two main roads extend through the NP area, utilised by residents and visitors for connectivity with surrounding towns and cities. The M4 motorway (junction 8/9) and the M40 motorway (junction 4) are both approximately seven miles away, providing further access to neighbouring, large employment/ service centres.
- 9.74 Congestion in the town is an issue locally, with 60% of respondents to the Transport Survey (2021) considering traffic and congestion in Henley and Harpsden to be ‘unreasonable’ and/or ‘unmanageable’. This reflects the findings of the Transport Study (2015), which highlights Henley as a town suffering from traffic congestion at peak times. Policy T3 (Easing Congestion) therefore only supports proposals where they “*will not severely adversely impact on traffic congestion in Henley Town Centre or at key junctions within the town or wider plan area*” and encourages the use of “*appropriate mitigation*”

measures as necessary". Furthermore, Policy T1 (Impact of Development on the Transport Network) requires that Transport Assessments (as required by Local Plan Policy TRANS4) *"should demonstrate the development's impacts on traffic during both the construction and operational phases and the expected effect of mitigation measures."* This is anticipated to lead to minor positive effects, supplementing Local Plan Policy TRANS4 to address specific transport issues in Henley and Harpsden.

- 9.75 Car reliance in the NP area is high (84.6%), and in line with national figures, a significant proportion of residents commute via the private vehicle.^[1] Due to presence of Henley-on-Thames train station and The Henley Town Bus Service, a number of local residents also commute to work by train and bus; although 31% and 41% of respondents to the Community Survey (2021) would like to use the train and bus more, respectively. Policy T5 (Public Transport) seeks to support public transport as 'first choice modes for all residents', in line with Revised JHHNP and SODC Local Plan objectives. In line with Policy T5 *"Improvements to the quality of the public transport serving the town centre will be promoted and encouraged to make public transport safer, more attractive and more convenient to users."*
- 9.76 The NP area is rich in Public Rights of Way (PRoW) footpaths, bridleways and walking trails, including the Oxfordshire Way path which runs between the Cotswolds and the Chilterns. Additionally, the Thames Path National Trail route runs north-south along the easternmost edge of the NP area. There is a clear intention through the NP to utilise the town's PRoW offer, increasing connectivity and bringing forward local transport that is more sustainable. Specifically, Policy T1 (Active Travel) supports *"measures to join up footpaths/ways and cycle paths/ways into comprehensive networks"* and resists development where it *"reduces the capacity of existing active travel infrastructure"*. Capitalising on the footpath network where possible through new development is considered to lead to positive effects, maximising local walkable connections to stimulate a modal shift and reduce congestion on local roads at peak times.
- 9.77 Ensuring that new development comes forward with adequate vehicle and cycle parking through Policy T6 (Parking and Standards) is also anticipated to lead to positive effects, reducing congestion and addressing local safety concerns for pedestrians and cyclists. This may in turn support increased uptake active travel within and around the town.
- 9.78 Positive effects are also anticipated to some extent through Policy T4 (EV Charging Points), which seeks to encourage electric vehicle charging, supporting a shift away from petrol/ diesel vehicles. This will in turn support sustainable travel uptake and emissions reductions in line with national and local climate change commitments (see the Climate Change SEA theme for further discussion).
- 9.79 Finally it is noted that Henley had relatively high levels of home working prior to the Covid-19 pandemic. These positive trends in relation to transport are considered likely to have increased and to prevail post lockdown to some degree, further supporting reduced congestion at peak times, and subsequently contributing towards meeting climate commitments.

^[1] Census, 2011

- 9.80 In terms of the site allocations, the new allocations the Northern Field at Highlands Farm (Site M1) is further from the town centre at the settlement edge, however it is supported by services and facilities along Greys Road and employment development is proposed alongside housing development to promote active travel opportunities. However growth at scale will inevitably lead to increased vehicular movement in and around the NP area to some degree with the potential for minor negative effects. In terms of the site allocations, a design brief must be produced for each site (Policy H1 (Design Brief)), and development must be implemented in accordance with the principles set out in the Design Brief. Of relevance to this SEA theme, Policy H1 requires that the brief must consider “Connecting walking and cycling routes”.
- 9.81 Overall, whilst measures are implemented to bolster sustainable transport connections, including active travel connections, **minor long-term negative effects** are anticipated as a result of a likely residual increase in vehicular traffic in the area. Notably, the promotion for electric vehicle charging infrastructure does offer an element of futureproofing however.

10. Conclusions and recommendations

- 10.1 Overall, the Plan appraisal has served to highlight the potential for both positive and negative effects of significance.
- 10.2 Significant positive effects are anticipated in relation to the population and communities SEA theme as a result of the growth strategy which includes an element of employment and retail development alongside housing growth and provides a buffer to better secure housing delivery.
- 10.3 The potential for significant negative effects is also highlighted in relation to both landscape and the historic environment. This relates to the spatial strategy which proposes an element of development within the AONB, and development within the vicinity of a Scheduled Monument. Whilst policy mitigation is provided to a certain extent, further consultation with both Natural England and Historic England is recommended as the Plan progresses.
- 10.4 The growth strategy is also considered likely to increase traffic and congestion within the Plan area to some degree and this has minor negative implications for transportation, air quality and the designated conservation area. Despite this, major development is expected to seek the ‘air quality neutral’ benchmark which should avoid significant effects arising, particularly within the designated AQMA.
- 10.5 Minor negative effects are also anticipated in relation to land and soil resources, given an element of greenfield (and potential high-quality agricultural land) development. However, it is recognised that this is largely reflective of a lack of suitable alternative and available brownfield sites.
- 10.6 Minor positive effects are concluded in relation to both climate change and health and wellbeing, predominantly reflecting the potential for connected and resilient development. Broadly neutral effects are concluded in relation to biodiversity and water resources, with no significant deviation from the baseline anticipated.

Part 3: What are the next steps?

11. Plan finalisation

- 11.1 This Environmental Report accompanies the pre-submission version of the JHHNP for consultation. Following consultation, any representations made will be considered by the Neighbourhood Plan Committee, when finalising the plan for submission.
- 11.2 The 'submission' version of the plan will then be submitted to SODC (alongside an Environmental Report Update, if necessary). The plan and supporting evidence will be then published for further consultation, and then submitted for examination.
- 11.3 If the outcome of the Independent Examination is favourable, the Revised JHHNP will then be subject to a referendum, and the plan will be 'made' if more than 50% of those who vote are in support. Once made, the Revised JHHNP will become part of the Development Plan for South Oxfordshire District.

12. Monitoring

- 12.1 The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report.
- 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 Annual Monitoring Report (AMR).
- 12.3 The SEA has not identified any potential for significant negative effects that would require closer monitoring, led by the Town Council.

Appendices

Appendix I: Meeting the Regulations

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 AI.1 links the structure of this report to an interpretation of Schedule 2 requirements, whilst Table AI.2 explains this interpretation. Table AI.3 identifies how and where within this report the requirements have/ will be met.

Table AI.1: Questions answered by this report, in-line with an interpretation of regulatory requirements

		Questions answered	As per regulations, the 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 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 A1.2: Interpretation of the regulations

<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	i.e. answer - <i>What are the key issues & objectives?</i>
(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	
(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]

Table AI.3: ‘Checklist’ of how (throughout the SEA process) and where (within this report) regulatory requirements are met

Regulatory requirement	Discussion of how requirement is met
A) The Environmental Report must present certain information	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 2 (‘What is the plan seeking to achieve’) presents this information.
2. 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 scoping work, which has involved dedicated consultation on a Scoping Report.
3. The environmental characteristics of areas likely to be significantly affected;	The ‘SEA framework’ – the outcome of scoping – is presented within Chapter 3 (‘What is the scope of the SEA?’).
4. 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.;	More detailed messages, established through a context and baseline review are also presented in Appendix II.
5. 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;	The SEA framework is presented within Chapter 3 (‘What is the scope of the SEA’). Also, Appendix II presents key messages from the context review. With regards to explaining “ <i>how...considerations have been taken into account</i> ”, Chapter 7 explains ‘reasons for supporting the preferred approach’, i.e. explains how/ why the preferred approach is justified in light of alternatives assessment.
6. 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);	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. 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.
7. 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;	The assessment highlights certain tensions between competing objectives, which might potentially be actioned when finalising the plan, and specific recommendations are made in Section 9.

Regulatory requirement	Discussion of how requirement is met
8. 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;	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. Also, Chapter 7 sets out reasons for selecting the preferred option (in-light of alternatives assessment).
9. Description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter 11 presents measures envisaged concerning monitoring.
10. A non-technical summary of the information provided under the above headings	The NTS is provided at the beginning of this Environmental Report.
B) The Report must be published for consultation alongside the draft plan	
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)	At the current time, this Environmental Report is published alongside the 'pre-submission' version of the Neighbourhood Plan, with a view to informing Regulation 14 consultation.
C) The report must be taken into account, alongside consultation responses, when finalising the plan	
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.	This Environmental Report, and consultation responses received, will be taken into account when finalising the plan.

Appendix II: The scope of the SEA

Introduction

This appendix presents additional information on the SEA scope, namely key issues under each of the SEA framework headings. As set out in the Scoping Report, these key issues were identified following a review of the context and baseline.

Additionally, this appendix presents a summary of responses received as part of the scoping consultation.

Air quality

- Emissions associated with road transport (primarily NO₂) are the main pollutant of concern in South Oxfordshire.
- The Henley AQMA was designated in 2002 for exceedances in NO₂. An Action Plan has been published by SODC.
- In addition to the Henley AQMA, there are two additional AQMAs within the district: Wallingford and Watlington AQMAs. Both AQMAs were declared due to exceedances in annual mean concentrations in NO₂. However, neither of these AQMAs are situated near the Neighbourhood Plan area.
- Traffic and congestion arising from planned new development within and surrounding the area have the potential to increase emissions and reduce air quality in the Neighbourhood Plan area.

Biodiversity

- There are no European protected sites for biodiversity within the Neighbourhood Plan area. However, there are three nationally designated SSSIs located within the Neighbourhood Plan area: Harpsden Wood SSSI, Highlands Farm Pit SSSI and Lambridge Wood SSSI. The integrity of these sites is protected in development through the provisions of the NPPF.
- The northern part of the Neighbourhood Plan area is located within SSSI IRZs for residential and rural-residential development types. The north-eastern part of the Neighbourhood Plan area is within a SSSI IRZ with a residential threshold of 100 units or more and a rural-residential threshold of 50 or more houses outside existing settlements. The north-western part of the Neighbourhood Plan area is within a SSSI IRZ with a rural-residential threshold of 100 or more houses.
- There are Priority Habitats and non-designated local sites that are recognised for their contribution to biodiversity, including watercourses. The NDP presents an opportunity to ensure that future development does not lead to any fragmentation of habitats, and instead supports enhanced multifunctional green infrastructure networks which support the integrity of these habitats. Ecological enhancement of wildlife corridors and stepping stones between sites of biodiversity value represents a key opportunity for the Neighbourhood Plan.

Climate change (mitigation and adaptation)

- Developments of new housing and infrastructure within the Neighbourhood Plan boundary have the potential to increase the local carbon footprint and overall greenhouse gas emissions in Henley-on-Thames and Harpsden.

- South Oxfordshire has seen a 33.3% decrease in total emissions per capita between 2005 and 2017. However, this decrease is less than the per capita percentage decrease in England for the same period and per capita emissions are higher in South Oxfordshire compared to the South East of England and England.
- The eastern part of the Neighbourhood Plan area (towards the River Thames) is situated in Flood Zone 2 and Flood Zone 3, meaning these areas have a medium to high risk from fluvial flooding. The increase in precipitation and peak river flow allowances associated with climate change may result in the floodplain encroaching on settlement areas in the future.
- Surface water flooding is generally low risk within the Neighbourhood Plan area, with localised areas of medium to high risk. Parts of the Neighbourhood Plan area are at high risk of groundwater flooding. There is an opportunity for the Neighbourhood Plan to support delivery of effective and high quality Sustainable Drainage Systems (SuDS).
- The Revised JHHNP should seek to increase the resilience of the Neighbourhood Plan area to the effects of climate change by supporting and encouraging adaptation strategies. This is both in respect of the socio-economy / communities and the natural environment. In respect of the latter, an important consideration is that the water environment will come under pressure due to low flows.

Health and wellbeing

- 86.5% of residents in the Neighbourhood Plan area consider themselves as having 'very good health' or 'good health', which is slightly higher than the totals for South Oxfordshire (85.9%), and higher than the South East of England (83.7%) and England (81.4%).
- The number of residents within the Neighbourhood Plan area who report that their activities are limited 'a lot' by their health (5.6%) is lower than the regional and national trends. Overall, 86.4% of residents within the Neighbourhood Plan area report that their activities are not limited, which is in line with the trends for South Oxfordshire (86.2%) and marginally lower than the South East of England (8.3%), and England (82.4%).
- Over half of deaths in those under 75 in the county were considered preventable, and the highest cause of preventable death in those under 75 was cancer. Dementia and Alzheimer's disease are increasing as a leading cause of death.
- Cardiovascular, cancer, depression and osteoporosis have higher prevalence in Oxfordshire GP-recorded data than national average.
- Depression diagnosis among adults is increasing. The rate of social, emotional and mental health needs of school pupils in Oxfordshire is increasing and remains above the national average.

Historic environment

- The Neighbourhood Plan area contains one scheduled monument, three conservation areas, two registered parks and gardens and 383 listed buildings.
- There are three conservation areas located within the plan area, referred to collectively as the 'Henley Conservation Area'. The Henley Conservation Area Management Plan 2005¹⁵ acknowledges that there are few development

¹⁵ South Oxfordshire District Council (2005) Henley Conservation Area Management Plan [online] available at: <http://www.southoxon.gov.uk/sites/default/files/Henley%20CA%20Management%20Plan%20.pdf>

opportunities within the Henley Conservation Area; however, there may be some sites where new development is acceptable. It sets out design guidance for new development, including the need for contextual design, urban grain and appropriate scale, density, height, massing and appearance of new development.

- The centre of Henley is characterised by its medieval street plan, by the survival of its burgage plots, by the continuous terraces of listed buildings and its principal streets and attractive riverside setting. Harpsden is a predominantly rural parish lying to the south of Henley.
- The grade II* St Mary's Church is considered to be vulnerable with a declining trend, according to the Heritage-at-risk register. This area of the Neighbourhood Plan area would require specialised attention to ensure that the area does not deteriorate further as a result of new development.
- There is a rich variety and distribution of designated and non-designated heritage assets present within the plan area; the significance and setting of which should be considered closely when selecting sites for allocation and setting policy. Archaeology is also an important consideration, including associated with the gravel geology of the former Thames, notably at the southern extent of Henley.

Landscape

- The Neighbourhood Plan area is located at the edge of the Chilterns AONB and development of the area should be sensitive to its landscape context.
- Development of the area may alter the appearance of the landscape and may reduce the sense of tranquillity. There may be associated demands on a variety of ecosystems in the area, including water availability and accessible green space.
- Woodland cover accounts for 14% of the Chilterns, making it one of the most wooded lowland landscapes nationally. The dense deciduous and mixed woodland, the intricate mosaic of commons, and pasture/ heathlands and mature field boundaries are all highly sensitive to changes in the area, including increases in traffic, noise and visual intrusion, intensified agricultural practices and more.

Land, soil and water resources

- National provisional quality datasets indicate Grade 2, Grade 3 and Grade 4 land and a 'moderate' likelihood of best and most versatile agricultural land, with small areas of 'high' likelihood.
- The high-level review of the British Geological Survey (BGS) maps show the bedrock geology is the White Chalk subgroup.
- Within the study area the primary waterbody is clearly the River Thames, but there are several other smaller waterbodies, potentially including chalk influenced.
- The Chilterns South catchment comprises 13 water bodies which are classified as ranging from 'Bad' to 'Good' ecological status. Reasons for not achieving good status primarily relate to: water industry, agriculture and rural land management, and urban and transport factors.
- A small section of the Neighbourhood Plan area is within the 'Sheeplands' Groundwater Nitrate Vulnerable Zone (NVZ). However, the Neighbourhood Plan is unlikely to allocate land for uses that give rise to a significant concern.
- As well as avoiding water pollution, there is a need to take wider steps to support the water environment, including minimising water use in the built environment.

Population and communities

- The population of Henley and Harpsden has increased by 9.14% in the decade from 2001. This percentage of population change is higher than the district, regional and national levels.
- 28.96% of residents within the Neighbourhood Plan area are within the 60+ age category, with fewer residents within the age category 16-24 in comparison to the regional and national trends. With regard to the working age categories (25-44 and 45-59) the total for the Neighbourhood Plan area is marginally lower than the total for South Oxfordshire, the South East of England and England.
- Four of the eight LSOAs in the Plan area are within the 10% least deprived within the country, whilst South Oxfordshire 016B (located to the north-west of Henley town centre) is within the 50% least deprived.
- 67.0% of residents either own their home outright or with a mortgage, which is higher than the figures for South Oxfordshire, the South East of England and England overall.
- The Neighbourhood Plan area has a highly qualified working population, with 44.6% of residents having a Level 4 qualification and above. 28.0% of residents in the Neighbourhood Plan area are currently economically inactive, which is in line with the South East of England, greater than South Oxfordshire but less than the average for England.

Transport

- There is one railway station within the Neighbourhood Plan area, Henley-on-Thames Railway Station, located immediately south of Henley town centre.
- There are a number of bus services providing residents with regular access to close by cities, towns and villages.
- The A4155 and the A4130 are the two main roads running through the Neighbourhood Plan area and providing residents with access to surrounding towns and cities. The M4 motorway (junction 8/9) and the M40 motorway (junction 4) are both about 7 miles (12 km) away.
- There are no airports in the Neighbourhood Plan area. Heathrow is the nearest international airport which is located approximately 30km west of the Neighbourhood Plan area.
- The Thames Path National Trail route runs north-south along the easternmost edge of the Neighbourhood Plan area. There are several other Public Rights of Way (PRoW) footpaths, bridleways and walking trails running through the Neighbourhood Plan area.
- There are no National Cycle Network routes intersecting the Neighbourhood Plan area itself; however, National Cycle Route 4 runs to the south-east of the area.
- Approximately 85% of households in the Neighbourhood Plan area have access to at least one car or van, which is higher than the totals for the South East of England and England but lower than the totals for South Oxfordshire.
- The most popular mode of transport to work in the Neighbourhood Plan area is driving via a car or van.

- A higher percentage of economically active residents in the Neighbourhood Plan area choose to work from home in comparison to the borough, regional and national trends.
- The percentage of the working population in the Neighbourhood Plan area that travel to work by train is higher than the district, regional and national averages; however, bus use as a means of travelling to work is comparatively low.

Scoping consultation responses

The draft SEA scoping report was shared with the Environment Agency, Historic England and Natural England for formal consultation in 2020. The responses received and how they have been addressed are presented below.

Table All.1: SEA scoping consultation responses

Consultee	Consultation response summary	AECOM response
Environment Agency	Comments focused on the need to increase the emphasis on the water environment and drainage.	The bullet point discussions of key issues under Biodiversity, Climate change and 'Land and water resources' have been expanded.
Historic England	The CA Management Plan has a set of issues identified (they aren't set out in the CA Appraisal) that should be identified in the scoping report so that potential cumulative effects can be taken into account - traffic through the town and shopfronts figure large.	The Management Plan is referenced and discussed in Section 9 and earlier in this appendix.
	The CA Appraisal and Management Plan is getting old and needs updating, particularly to review the issues identified and whether management has worked or not.	Noted
	There is a need to assess all proposed allocations against sites on the HER. There is an existing issue that the big palaeolithic archaeology site is [a current and potential further growth location]. This a very specialised area in British Archaeology, and may require specialist assessment.	It has not been possible to interrogate the HER or undertake specialist assessment, but readily available evidence has been drawn upon, and any further guidance provided by Historic England will inform further work prior to submission.
Natural England	NE provided standard guidance on 'Neighbourhood planning and the natural environment: information, issues and opportunities.'	Noted

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Harpsden
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For further information, see www.jhhnp.org.uk

