

Strategic Environmental Assessment (SEA) for the Revised Long Wittenham Neighbourhood Plan (RLWNP)

Further Environmental Report Update

November 2021

Quality information

Prepared by	Checked by	Verified and approved by
Cheryl Beattie Principal consultant	Mark Fessey Associate	Nick Chisholm-Batten, Associate
Tom Collie Senior Archaeological Consultant		

Revision History

Revision	Date	Details	Name	Position
1	27/10/21	Draft	Andrea Pellegram	Planning consultant to Long Wittenham Parish Council
2	13/11/21	Draft	As above	As above
3	23/11/21	Final for consultation	As above	As above

Prepared for:

Long Wittenham Parish Council

Prepared by:

AECOM Limited
3rd Floor, Portwall Place
Portwall Lane
Bristol BS1 6NA
United Kingdom

T: +44 117 901 7000
aecom.com

© 2021 AECOM Limited. All Rights Reserved.

This document has been prepared by AECOM Limited (“AECOM”) in accordance with its contract with Locality (the “Client”) and in accordance with generally accepted consultancy principles, the budget for fees and the terms of reference agreed between AECOM and the Client. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. AECOM shall have no liability to any third party that makes use of or relies upon this document.

Table of Contents

Non-Technical Summary	i
1. Introduction	1
2. The scope of the RLWNP	2
3. The SEA scope.....	5
Part 1: What has plan-making/ SEA involved to this point?	7
4. Introduction (to Part 1)	8
5. Defining reasonable alternatives	9
6. Alternatives assessment	21
7. The preferred option	26
Part 2: What are the SEA findings at this stage?.....	27
8. Introduction (to Part 2)	28
9. Appraisal of the RLWNP	29
Part 3: What are the next steps?	35
10. Next steps	36
Appendix I: Meeting the Regulations	38
Appendix II: The scope of the SEA.....	42
Appendix III: Historic environment.....	49

Non-Technical Summary

AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Revised Long Wittenham Neighbourhood Plan (RLWNP).

The RLWNP is being prepared by Long Wittenham Parish Council, under the Neighbourhood Planning Regulations 2012 and in the context of the South Oxfordshire Local Plan (2020). Once 'made' the RLWNP will have material weight when deciding on planning applications, alongside the South Oxfordshire Local 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 Further Environmental Report Update

This is the fourth version of the Environmental Report, with earlier versions having published alongside earlier versions of the RLWNP in 2018 and 2019.

Since 2019 a range of work has been undertaken, particularly around historic environment constraints affecting the parish and the RLWNP. This Further Environmental Report Update is published alongside a revised draft version of the RLWNP, with a view to informing the consultation and plan finalisation.

This report answers questions 1, 2 and 3 in turn.

Firstly, there is a need to set the scene further by explaining the SEA scope?

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
Biodiversity	Protect and enhance all biodiversity and geological features.
Climate change	Reduce contribution to climate change
	Support resilience to the effects of climate change, including flooding

SEA topic	SEA objective
Health and wellbeing	Improve the health and wellbeing of residents.
Historic environment	Protect, maintain and enhance the cultural heritage resource, including the historic environment and archaeological assets.
Landscape	Protect and enhance character and quality of land and townscapes, in particular the setting of the AONB
Land, soil and water resources	Ensure the efficient and effective use of land.
	Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste.
	Use and manage water resources in a sustainable manner.
Population / 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, tenures.
Transport	Promote sustainable transport use and reduce the need to travel.

Plan making/SEA up to this point

An important element of the required SEA process involves assessing **reasonable alternatives** in time to inform development of the draft 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 addressing the central objective of the plan, namely allocating land for new **community infrastructure**.

The process of arriving at reasonable alternatives involved a process of considering both the strategic context and aims/objectives, alongside understanding of the sites available and in contention for allocation. The process is set out in Section 5, and summarised in a flow diagram.

Two RAs were ultimately defined and subjected to assessment:

- **Option 1** - Allocate land for a new community hub, and enabling housing (40-45 homes) to cross-fund the community hub, at Didcot Road (south of the village)
- **Option 2** - Allocate land for a new community hub, and enabling housing (several hundred homes) to cross-fund the community hub, west of the village.

Table B presents the assessment findings. Presented subsequently is the Parish Council's response to the assessment, i.e. reasons for supporting the preferred Option, which is **Option 1**.

Assessment methodology:

Within each row of Table B (i.e. for each of the topics that comprise the SEA framework) the columns to the right hand firstly rank the alternatives 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 B: Alternatives assessment findings

Topic	Option 1 Community hub, and enabling housing (40-45 homes) at Didcot Road (south of the village)	Option 2 Community hub, and enabling housing (several hundred homes) west of the village)
Biodiversity	=	=
Climate change	?	?
Historic environment	1	2
Health	=	=
Landscape	1	2
Land, soil & water resources	1	2
Population & community	1	2
Transportation	1	2

Discussion

An immediate point to note is that progressing either option, whilst likely to contribute significantly to the achievement of socio-economic objectives, would lead to tensions with a range of environmental (including historic environment) objectives, although all of the predicted environmental tensions and drawbacks are judged to be of limited significance.

As such, regardless of which option is judged to be preferable, it will be for the Parish Council to decide whether the socio-economic benefits outweigh the environmental drawbacks, recognising that there is also the option of not progressing with a RLWNP focused on allocating land for new community infrastructure.

The second point to note is that the assessment finds Option 1 to be preferable in terms of four topics, and does not find Option 2 to be preferable in terms of any topic, which is a strong indication that Option 1 is the preferable option overall. However, it is important to recognise that:

- a) the assessment findings are associated with a range of assumptions and uncertainties, perhaps most notably in respect of historic environment issues and impacts; and
- b) there may well be issues and objectives besides those that are a focus of the assessment that the Parish Council wishes to give weight to, when arriving at a decision on which option is preferred on balance.

Having made these initial points, the following bullet points consider the topics in turn:

- **Biodiversity** – there are limited concerns associated with either option. The northern extent of the potential growth location under Option 2 would encroach upon the river corridor, including ‘Hayward’s Eyot’ Local Wildlife Site (LWS), but there would be good potential to avoid and mitigate impacts through scheme layout etc.¹ It is also noted that Option 2 would likely involve breaching field boundaries shown on early OS maps that could have biodiversity value.

Finally, with regards to Little Wittenham Special Area of Conservation (SAC) to the east, whilst Option 1 would involve development slightly closer, the SAC would still be beyond easy walking distance, and the SAC is understood to be well-managed for access by the Earth Trust. There could be a concern regarding the quantum of new homes under Option 2 leading to problematic recreational pressure, but this is unclear (no concerns have been raised by Natural England).

- **Climate change** – the key issue here is climate change adaptation / resilience, and specifically the need to avoid land at risk of flooding, or land that might be at risk of flooding the future. In this respect, there is likely to be a risk of development encroaching upon and potentially intersecting fluvial flood risk zone 2 under both options; however, there is uncertain at the current time, as no assumptions are made regarding the layout of development under either option. Also, there is a need to consider that some low sensitivity uses can be acceptable within fluvial flood risk zone 2.

With regards to climate change mitigation, there can be opportunities for larger schemes to achieve economies of scale that lead to an opportunity to take steps towards minimising per capita greenhouse gas emissions from the built environment. For example, larger schemes might seek to achieve operational (‘in use’) regulated emissions standards that exceed the requirements of Building Regulations (which are set to tighten over coming years), and can be more likely to take steps towards minimising non-operational emissions, e.g. embodied carbon in building materials and emissions associated with construction. However, it is difficult to suggest that Option 2 would give rise to any significant opportunity, given the likely scale of the scheme, and also an assumption that community infrastructure would be a funding priority.

- **Historic environment** – this is a crucial issue for the assessment, in light of concerns raised by Historic England on the previous version of the RLWNP published / submitted in 2018/19, and in light of subsequent efforts to build evidence and understanding.

Beginning with Option 1, the issues and sensitivities associated with the site are discussed in detail in Appendix III. Key issues relate to the open and rural setting of the adjacent scheduled monument (there is at least one slight possible earthwork but it is otherwise below ground) and the archaeological value of the site itself, with less significant considerations relating to the setting of the village conservation area and views from Wittenham Clumps. Through recent engagement with Historic England it has been established that, on the assumption of a sensitively designed scheme:

¹ Under Option 2 there could be some pressure for development to extend north to include Site 4, which is sensitive from a biodiversity perspective (see discussion at paragraph 5.17, above); however, it is difficult to assume this would be the case.

- the level of harm to designated heritage assets would be less than substantial and should not rise above minor harm;
- there would be harm to the undesignated archaeological deposits on the site, but these assets are not likely to be of national significance, and the impact on archaeological deposits could likely be mitigated to a point of acceptability through preservation in situ by careful design, and / or archaeological investigation before or during development.

In short, Historic England are in agreement that, whilst development would lead to negative impacts, even after mitigation, these are of a significance that can be balanced against the socio economic benefits that would arise from development.

With regards to Option 2, evidence available to inform the assessment is more limited (see Appendix III); however, land here is likely constrained by:

- the setting of the village conservation area (broadly *as per* the Didcot Road site);
- the setting of Wittenham Clumps (see discussion below, under Landscape);
- the setting of the scheduled monument to the west (although the flood risk zone would ensure a landscape buffer, even under a scenario whereby the scheme extends as far as the B0146), with the Historic Environment Record (N.B. no listing information available for the scheduled monument) recording that this is an Iron Age to Roman Settlement and Bronze Age Barrow Cemetery, and that a ‘circular feature’ is “visible in NW side of field” (which is presumably some way distant from the potential development site under consideration); and
- the value of onsite archaeology, which is less well known in comparison to the Didcot Road site, due to less detailed investigation having been completed, but which could easily be of regional importance. The Historic Environment Record serves to highlight that some or many of the sensitivities associated with the Didcot Road site are also likely to apply to land west of the village, including the ‘large multi-period cropmarked complex’ that extends across much of the land south of the village, and the location of a pre-historic trackway. It also possible to draw upon analysis of cropmark data by Historic England, which suggests the presence of a large, multi-phase site of archaeological interest, including settlement and other features likely to be of Iron Age, Roman-British and potentially Early Medieval origin. It could also be that further investigation serves to highlight that the archaeological assets within the site are of national significance, but this is an unknown.

In conclusion, differentiating between the two options is challenging on the basis of some inconsistency across the available evidence. Less is known about the archaeological constraint affecting Option 2; however, on balance it is considered appropriate to highlight a greater concern with Option 2, in light of the available evidence, and because, generally speaking, this would involve a much larger scheme in a sensitive landscape.

- **Health** – there are no particular ‘health’ related issues for discussion over-and-above the matters discussed below, under the Communities heading. Road and pedestrian/cyclist safety can often be a matter warranting stand-alone consideration here; however, in this instance, there are not known to be any particular issues with either option.
- **Landscape** - the current LWNP (2018) recognises the importance of viewing corridors across the Didcot Road site (Option 1), towards Wittenham Clumps; however, the situation has now changed, due to Fieldside being under construction for 36 homes. Concerns do remain, however, recognising that scheme layout for the Didcot Road site is an unknown at this stage. As for views into the site from the Clumps, these are understood to be largely restricted by intervening tree growth.

With regards to Option 2, the scheme would be of a much larger scale, and this is a sensitive landscape in that it forms a gap between Long Wittenham and Didcot Garden Town, which is expanding (as explored in detail in the 'Countryside' Evidence Paper, 2021). The assumption, for the purposes of this assessment, is that development would extend west only as far as a band of fluvial flood risk zone 2, thereby leaving a landscape gap to the B4016, and Didcot beyond; however, in practice there would be pressure for / a risk of development expanding across the flood zone, as far as the road.

As well as pure settlement gap/coalescence considerations, there is a need to recognise that the land here will be appreciated by users of two or three public rights of way, including a bridleway linking Didcot Garden Town to Long Wittenham and the River Thames, which forms part of National Cycle Route 5, with clear views of Wittenham Clumps to the east. Also, it seems likely that the open agricultural landscape here could contribute to the setting of the AONB to a greater extent than land at Didcot Road, given views not only from Wittenham Clumps (albeit somewhat distant, and of uncertain significance) but also Sire's Hill (or Down Hill) to the south. There could well be a sense of urbanisation in the landscape over-and-above Option 1, recognising that, under Option 1, new development could be contained on two sides by existing built form.

- **Land, soil and water resources** – a key consideration is loss of best and most versatile agricultural land, with the low resolution nationally available dataset (available at www.magic.gov.uk) indicating that much of the land in the vicinity is of Long Wittenham is likely to be best and most versatile (specifically grade 2, where grades 1, 2 and 3a are classified as best and most versatile, BMV). However, there is little certainty, as neither site has been surveyed in detail, and some nearby land (on the edge of Didcot, so in relative proximity to land west of Long Wittenham) has been surveyed in detail and found to comprise land that is of grade 3b quality (i.e. non-BMV). In light of these points, there is an argument for highlighting a concern with Option 2, as this would involve a larger loss of agricultural land that is potentially of BMV quality.

Secondly, it is important to note that all land south of Long Wittenham falls within a Minerals Safeguarding Area and an area safeguarded for sharp sand and gravel, as understood from the adopted Oxfordshire Minerals and Waste Core Strategy (2017; see the Policy Map [here](#)). The designation is a constraint to both options; however, in practice, it is thought unlikely that minerals excavation is a realistic option for land at Didcot Road (Option 1), given proximity to the village. It could well be an option for land to the west of Long Wittenham (Option 2); however, there could be the potential to extract minerals ahead of development (although this could delay the delivery of much needed new community infrastructure).

Overall, in respect of this topic, it is fair to highlight a preference for Option 1. It is important to recall that under this option the landowner is proposing to make a high proportion of the site available for community infrastructure, such that the number of enabling homes needed is a fraction of that that would be necessitated under Option 2, thereby serving to minimise the extent of greenfield loss within a sensitive broad area.

- **Population and community** – there are a number of factors to consider:
 - The key point to note is that whilst either option would deliver a new community hub, Option 2 would potentially more than double the size of the village, and risk coalescence with Didcot, and therefore greatly impact the sense of place, and potentially the sense of community, experienced by the village's residents.
 - Related to the above, it is important to consider that options for a community hub south of the village have now been widely discussed, and explored with residents, for over a decade, such that a dramatic change of tack now would risk widespread consternation.
 - Also related to point 1, there is also a need to consider the importance of access to high quality countryside, and Long Wittenham as an attractive historic village (with two pubs) to the residents of Didcot Garden Town.

- Whilst Option 2 would deliver a large volume of housing, there is little or no evidence to suggest that this housing is needed.
- Option 2 would locate the community hub at the western extent of the village, which is a less accessible location, albeit it would be easily accessible to residents of the existing housing area at the western edge of the village. Conversely, Option 1 would deliver the new hub at a central location, such that it would effectively form a focal point for the village.
- **Transportation** – either option would support the relocation of the school and village hall away from the High Street, which is a key objective from a transport (traffic) perspective. However, under Option 2 there is little certainty regarding the precise access and road infrastructure (also walking/cycling infrastructure) that would be necessary, achievable and viable.

The Parish Council responded to the growth scenarios assessment is as follows:

“Option 1 is the Parish Council’s preferred option, in light of the assessment, which shows this option to perform well relative to Option 2.

It is recognised that there are a range of issues and likely impacts associated with Option 1; however, there will be the potential to avoid and mitigate impacts through the development management process, guided by policy within the RLWNP. There may nonetheless be residual negative impacts, perhaps most notably in respect of the historic environment, but the Parish Council believes that these are likely to be outweighed by the community benefits that will result from delivering a new community hub, and enabling the relocation of the school and village hall away from their current locations on the High Street.

There is no other ‘do something’ option for the RLWNP, as there is little or nothing that the plan can do to enable a successful redevelopment of the existing school site. The only other option for the Parish Council would be to not progress with a RLWNP focused on the allocation of land for community infrastructure, but this option is not favoured because of a well understood need to proactively take steps to address the current issues with the school and village hall.

Assessment findings at this stage

Part 2 of this report presents an assessment of the RLWNP 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:

The assessment predicts significant positive effects in terms of Population and communities objectives, given the clear merit in the proposed new community hub (and enabling housing) scheme, but serves to highlight tensions with certain environmental objectives, namely:

- Climate change – flood risk is extensive in the area, and flood risk zone 2 does intersect the proposed Didcot Road allocation site;
- Historic Environment – this is the centrally important issue for the RLWNP, with the primary considerations relating to on-site archaeology within the Didcot Road site and the setting of the adjacent scheduled monument; and

- Land, soils and natural resources – as the Didcot Road site is likely to comprise best and most versatile agricultural land, and also falls within a broad area safeguarded for potential minerals extraction.

It is for the plan-maker to consider if and how these tensions can be addressed or reduced ahead of the plan being finalised.

Next steps

This Further Environmental Report Update is published for consultation alongside a revised draft of the RLWNP, in order to inform the consultation.

Subsequently steps will be taken to finalise the RLWNP, taking account of this report, consultation responses and any other new and updated evidence.

It will then be for an Independent Examiner to explore whether the RLWNP meets the Basic Conditions for Neighbourhood Plans, and to confirm that it is in general conformity with the Local Plan.

If the Independent Examination is favourable, the RLWNP will be subject to a referendum. If more than 50% of those who vote agree with the RLWNP, then it will be 'made'. Once made, the RLWNP 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 Long Wittenham Neighbourhood Plan (RLWNP), which is being prepared by Long Wittenham Parish Council in the context of the South Oxfordshire Local Plan (2020). Once 'made' the RLWNP will form part of the Development Plan for South Oxfordshire and will supersede the current Long Wittenham Neighbourhood Plan (2017).
- 1.2 SEA is a required process 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.²

SEA explained

- 1.3 It is a requirement that the SEA process is undertaken in-line with the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.4 In-line with the Regulations, a report (known as the Environmental Report) must be published for consultation alongside the draft plan that "identifies, describes and evaluates" the likely significant effects of implementing "the plan, and reasonable alternatives".³ The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.5 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 Further Environmental Report Update

- 1.6 This is the fourth version of the Environmental Report, with earlier versions having published alongside earlier versions of the RLWNP in 2018 and 2019.
- 1.7 Since 2019 a range of work has been undertaken, particularly around historic environment constraints affecting the Parish and the RLWNP. This Further Environmental Report Update is published alongside a revised draft version of the RLWNP, with a view to informing the consultation and plan finalisation.
- 1.8 This report answers questions 1, 2 and 3 in turn, to provide the required information.⁴ Each question is answered within a discrete 'part' of the report.
- 1.9 First, two further introductory sections further set the scene.

² Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: A) an environmental report; or, B) a statement of reasons why SEA is not required, prepared following a 'screening' process. The RLWNP was subject to screening in 2017, on the basis of which it was determined that there *is* a requirement for SEA (i.e. the plan was 'screened-in').

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

⁴ See **Appendix A** for further explanation of the report structure including its regulatory basis.

2. The scope of the RLWNP

Introduction

- 2.1 This section considers the context provided by the South Oxfordshire Local Plan before setting out the RLWNP vision and a discussion of plan objectives.
- 2.2 To reiterate, there is already an adopted Long Wittenham Neighbourhood Plan, which will be superseded by the RLWNP. The original Long Wittenham Neighbourhood Plan (LWNP) was adopted on the 12th October 2017.
- 2.3 The neighbourhood plan area is shown in Figure 2.1.

The Local Plan context

- 2.4 The South Oxfordshire Local Plan 2035 (December 2020) (referred to here as the Local Plan) defines Long Wittenham as a ‘smaller village’, such that key context is provided by the following policies:
 - STRAT1 (Overall Strategy) – the overall strategy is to support smaller villages by “allowing for limited amounts of housing and employment to help secure the provision and retention of services.”

The supporting text also explains: “We are directing development to the Larger Villages to complement the spatial strategy and will support those Neighbourhood Development Plan groups who wish to promote development in the Smaller Villages.”

 - H1 (Delivering New Homes) – recognises that small housing sites will be allocated in Neighbourhood Development Plans over-and-above those allocations already in place at the time of plan-finalisation, but does not set out any expectation regarding the number of homes that will come forward in this way (see Table 4c *Expected sources of housing supply*, noting that allocations through a Neighbourhood Plan are distinct from windfall sites).
 - H8 (Housing in the Smaller Villages) – is set out in in Box 2.1.

Box 2.1: South Oxfordshire Local Plan Policy H8: Smaller Villages

Policy

1. The Council will support development within the Smaller Villages in accordance with Policy H16. Where a Parish Council wishes to prepare a [Neighbourhood Plan] and make housing allocations within it to support further growth, the Council will support this.
2. Those [Neighbourhood Plans] will need to demonstrate that the level of growth they are planning for is commensurate to the scale and character of their village, and this is expected to be around a 5% to 10% increase in dwellings above the [current dwelling stock].
3. [Neighbourhood Plans] allocating sites on greenfield sites in these locations should consider how development can meet the bespoke needs of their village, including housing mix, tenure and the amount of affordable housing.

Relevant paragraph of the supporting text

Smaller Villages, as defined in the settlement hierarchy, have no defined requirement to contribute towards delivering additional housing (beyond windfall and infill development) to meet the overall housing requirement of South Oxfordshire... However some parishes may still wish to proceed with preparing a [Neighbourhood Plan] for example to achieve the protection afforded by allocating housing to fund projects they want to deliver or they would like to identify a specific type of housing bespoke to their village's needs. The Council's strategy therefore allows them to do so, provided that the levels of growth are commensurate to the size of the village.

RLWNP vision and objectives

2.5 The RLWNP aims to contribute to the following vision for Long Wittenham:

In the year 2035, Long Wittenham will be a place where:

- *A new community hub will be conveniently located. This will provide a modern and well-equipped Village Hall that can accommodate a range of clubs and activities, perhaps contain a shop or café, host pop-up craft and food markets, and be the stage for public life in the village.*
- *The modern primary school and pre-school will have good outdoor facilities and capacity to accommodate all children's needs.*
- *Playing fields for the school and the community will be available with modern facilities to encourage healthy life styles throughout the year.*
- *There will be good provision for sustainable transport routes in the village to encourage more people to walk and cycle for commuting and recreation.*
- *On-street parking will be reduced, and road users will have unimpeded access through the village.*
- *The high-quality character of the village, including its physical and visual links to the surrounding countryside and the River Thames, will be unchanged or better.*
- *There is a pleasant and green environment that respects biodiversity, local views and the intrinsic value of the countryside.*
- *Sufficient new housing of the right type will be available to meet the changing needs of the villagers as they start new families or down-size for retirement.*

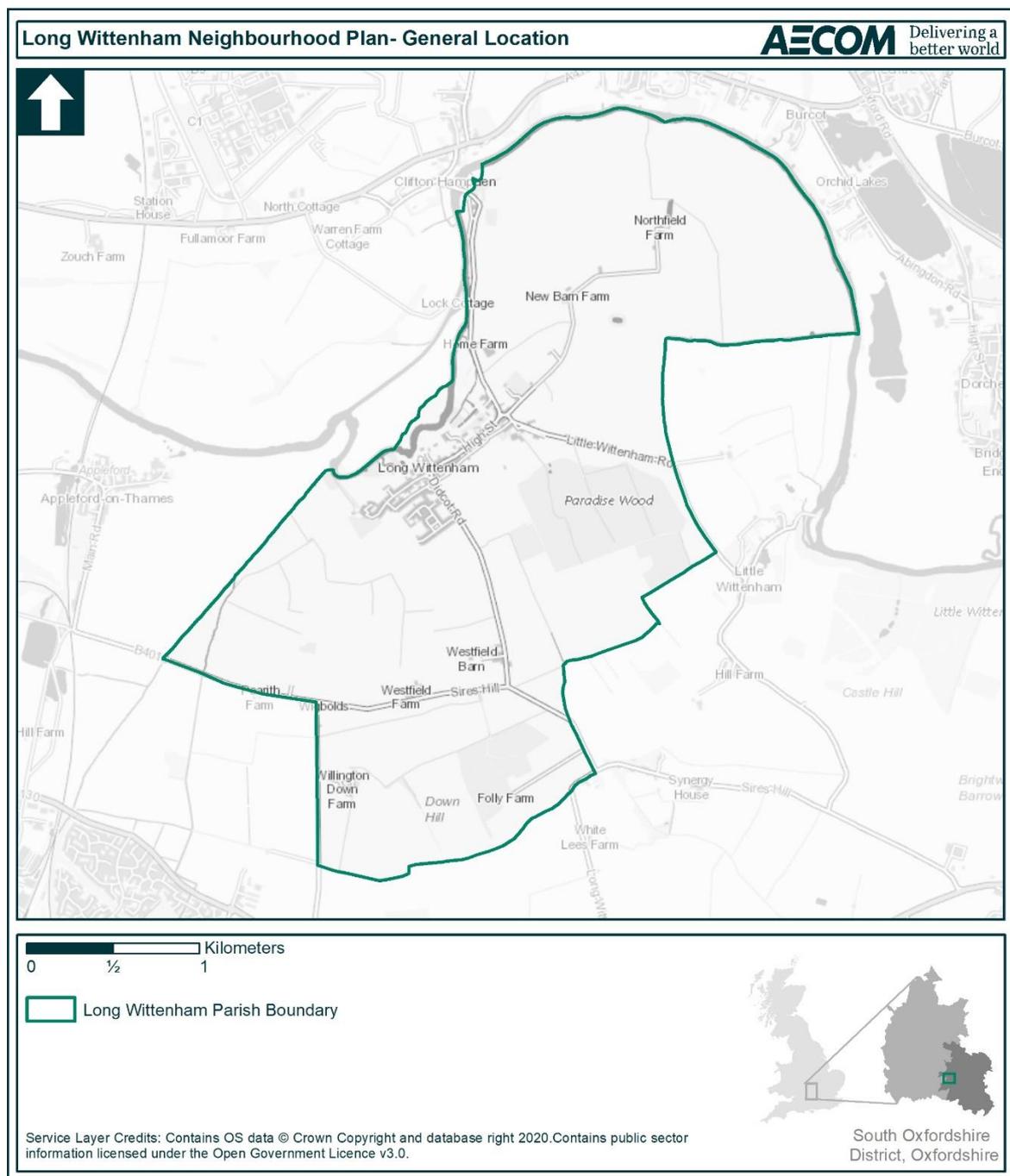
2.6 The RLWNP is being prepared with quite specific objectives, which are set out clearly in Part 1 ("Introduction") of the current consultation document.

2.7 In short, the key objective is to secure improved **community infrastructure**, and the consultation document elaborates as follows: *"The village's challenges can be met by a strategic re-organisation of civic activities. At the heart of the strategy is the creation of a new community hub on a single site. Since the existing Village Hall and primary school can no longer meet current expectations and cannot be modified to do so, it is now necessary to rethink their current location and form... This solution cannot put a strain on the public purse... so it will be necessary to support the public service provision with other activities that generate enough profit to fund the entire scheme."*

2.8 The option of a new **community hub** is not new, having first been considered in the Wittenham Vision in 2010, it features as a central proposal within the current Neighbourhood Plan, and was a central proposal within versions of the RLWNP consulted upon in 2018 and 2019. However, it is recognised that there is also a need to remain open to means of addressing the villages community infrastructure-related challenges without the need for a new community hub.

2.9 Finally, with regards to “*activities that generate enough profit to fund [community infrastructure]*”, this primarily means market housing, henceforth referred to as ‘enabling housing’. It is important to be clear that the South Oxfordshire Local Plan does not require the RLNP to allocate land for new housing, but is supportive of Neighbourhood Plans that seek to allocate land for housing in order to secure the achievement of established plan objectives.

Figure 2.1: The plan area



3. The SEA scope

Introduction

3.1 The aim here is to introduce the reader to the sustainability topics, objectives and issues that should be a focus of the assessment of the plan and reasonable alternatives. Appendix II presents further information.

Consultation

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

3.3 As such, these authorities were consulted in 2018. Since that time there have been three consultations on the plan and/or Environmental Report, as part of which a range of evidence has been gathered of relevance to the SEA scope. With regards to evidence relating to archaeology, the timeline of evidence-gathering is discussed within a separate Evidence Paper on Archaeology which accompanies the RLWDNP.

Historic environment evidence gathering

3.4 Detailed work has been completed to understand the archaeological constraints (also opportunities) affecting the parish, following major concerns being raised by Historic England in 2018 and 2019. This work is discussed throughout this report, notably within Section 5 and Appendix III.

3.5 It is also important to note that:

- Evidence gathering and SEA ‘scoping’ more generally, has been undertaken in close collaboration with Historic England, particularly over the period mid to late 2021. This included a meeting between the District Council, the steering group and Historic England held on 16th September 2021.
- There is a separate, stand-alone Evidence Paper on Archaeology which accompanies the RLWDNP.

The SEA framework

3.6 Table 3.1 presents the list of topics and objectives forms the back-bone of the SEA scope, and comprises a ‘framework’ under which to complete assessment.

3.7 There has been one adjustment made to the SEA framework since 2019. Specifically, the decision was taken to consider the historic environment under a stand-alone topic heading, rather than as one element of broader topic heading also covering landscape.

⁵ These consultation bodies were selected “*by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes*” (SEA Directive, Article 6(3)).

Table 3.1: The SEA framework

SEA topic	SEA objective
Biodiversity	Protect and enhance all biodiversity and geological features.
Climate change	Reduce contribution to climate change
	Support resilience to the effects of climate change, including flooding
Health and wellbeing	Improve the health and wellbeing of residents.
Historic environment	Protect, maintain and enhance the cultural heritage resource, including the historic environment and archaeological assets.
Landscape	Protect and enhance character and quality of land and townscapes, in particular the setting of the AONB
Land, soil and water resources	Ensure the efficient and effective use of land.
	Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste.
	Use and manage water resources in a sustainable manner.
Population / 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, tenures.
Transport	Promote sustainable transport use and reduce the need to travel.

*Brightwell Barrow, adjacent to Wittenham Clumps*

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

4. Introduction (to Part 1)

Overview

- 4.1 Work on the RLWNP has been underway since 2018, with several consultations having been held over the period 2018 to 2019.
- 4.2 However, the aim here is not to provide a comprehensive audit trail of work to date. Rather, the aim is to explain work undertaken to develop and assess **reasonable alternatives** in 2021 - taking account of concerns raised by Historic England in particular - and how this work fed into plan-making.
- 4.3 More specifically, this part of the report explains work undertaken to explore reasonable alternative approaches to addressing the central objective of the plan, namely allocating land for new **community infrastructure**.

Why focus on community infrastructure?

- 4.4 The decision was taken to develop and assess reasonable alternatives in relation to the matter of allocating land for community infrastructure in light of the discussion of plan objectives presented in Section 2, and because of the likelihood of being able to differentiate between the merits of alternatives 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 alternatives** - is ultimately the responsibility of the plan-maker, although the SEA consultant (AECOM) is well placed to advise. For this report, Historic England was also consulted on how to identify reasonable alternatives, including through a meeting in September 2021.
 - **Assessing alternatives** - is the responsibility of the SEA consultant.
 - **Selecting a preferred option** - is the responsibility of the plan-maker.

Structure of this part of the report

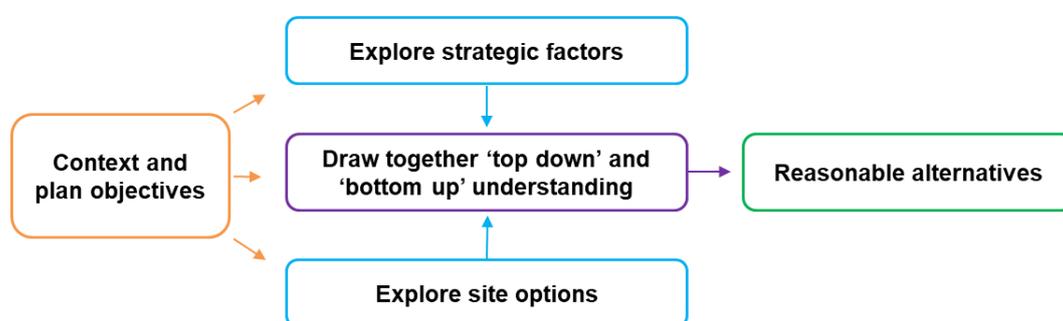
- 4.6 This part of the report is structured as follows:
 - **Chapter 5** - explains the process of defining alternatives;
 - **Chapter 6** - presents the outcomes of assessing alternatives;
 - **Chapter 7** - explains reasons for selecting the preferred option.

5. Defining reasonable alternatives

Introduction

- 5.1 The aim here is to explain a process that led to the definition of reasonable alternatives for assessment, and thereby present “an outline of the reasons for selecting the alternatives dealt with”.⁶
- 5.2 Specifically, there is a need to: 1) explain strategic factors with a bearing on defining alternatives; 2) discuss the site options in contention for allocation; and then 3) explain how this ‘top down’ and ‘bottom up’ understanding was married together in order to arrive at reasonable alternatives for assessment.

Figure 5.1: Defining reasonable alternatives



Strategic factors

- 5.3 The aim of this section is explore strategic factors with a bearing on the establishment of reasonable alternative approaches to the allocation of land for community infrastructure . Specifically, this section of the report explores:

- Community infrastructure requirements
- Wider strategic community factors
- Key environmental factors

Community infrastructure requirements

- 5.4 The current consultation document explains that there is a need to address the following community infrastructure-related challenges:

- The village hall – is small, over-subscribed and lacks sufficient parking.
- The pre-school - is the currently the village hall’s primary user, which gives rise to a range of issues. There is a need for a dedicated building preferably linked to the primary school.
- The primary school – fails to meet policies for internal and external facilities. The County Council has consistently been unable to produce a viable plan to redevelop a new school on the site, and advice commissioned by the school governors found that re-development of the school is not financially viable. As such, there is a concern over the long-term future of the school. The current built structure is failing and interim repairs are frequently needed. The playing fields do not meet modern space standards.

⁶ Schedule 2(8) of the SEA Regulations.

- The lack of a shop – whilst it is doubtful whether a commercial shop would be viable in the village, there is a community aspiration for some form of retail, e.g. a monthly market or a community-run shop.
 - Traffic and parking – is an issue, particularly at school drop off and pick up times or when there is an event at the village Hall, although there will be a reduction in rat-running traffic if and when the proposed new Thames river crossing is delivered. The Parish Council has been working with County Council to prepare plans for speed reductions with traffic calming.
- 5.5 In short, both the village hall and the primary school are currently sub-standard facilities, and neither is considered well-located on the high street, given traffic issues. In addition, there is no scope to physically improve these facilities. As such, there is a need to explore replacement facilities in a better location, and at the same time consider the potential for a stand-alone pre-school building and potentially space for a community run shop or similar.

Wider strategic community factors

- 5.6 Whilst not a driving force behind the RLWNP to the same extent as addressing the community infrastructure challenges described above, it is recognised that there are likely to be existing housing needs to some extent locally. Whilst the South Oxfordshire Local Plan does not require the provision of housing through the RLWNP, and 40 new homes have been completed or gained planning permission since the start of the Local Plan period (2011; this equates to a circa 12% increase in dwelling stock, i.e. a figure in excess of the 5-10% guideline set out in Local Plan Policy H8), there may still be some local housing needs.
- 5.7 Primarily evidence for this comes from a survey completed in 2015, with the current consultation document explaining: *“The Neighbourhood Plan Survey showed that the relatively high house prices have created a need for smaller starter homes, family homes and a limited amount of affordable housing. The high cost of housing and the lack of suitable housing were the main reasons given for respondents wanting to move but not being able to move within the village or return to the village from outside.”*
- 5.8 In this light, whilst it would not be appropriate for RLWNP to allocate land for housing solely to meet housing needs (a review of the Local Plan will be undertaken within the next few years, which will be an appropriate forum for re-examining what if any housing needs exist in the District’s small villages), housing needs serve as a reason to being open to accepting enabling housing in order to ‘unlock’ new land for community infrastructure.

Key environmental factors

- 5.9 The aim here is to present a brief discussion of key environmental factors with a bearing on defining reasonable alternatives (as opposed to all environmental issues/objectives of relevance to the SEA – see Appendix II).
- 5.10 An immediate consideration is flood risk, with there being virtually no potential for the village to expand to the north, due to the River Thames, and further flood risk zones constraining land to the west (Moor Ditch), south (west of Paradise Wood) and east (much of the river meander is subject to flood risk).

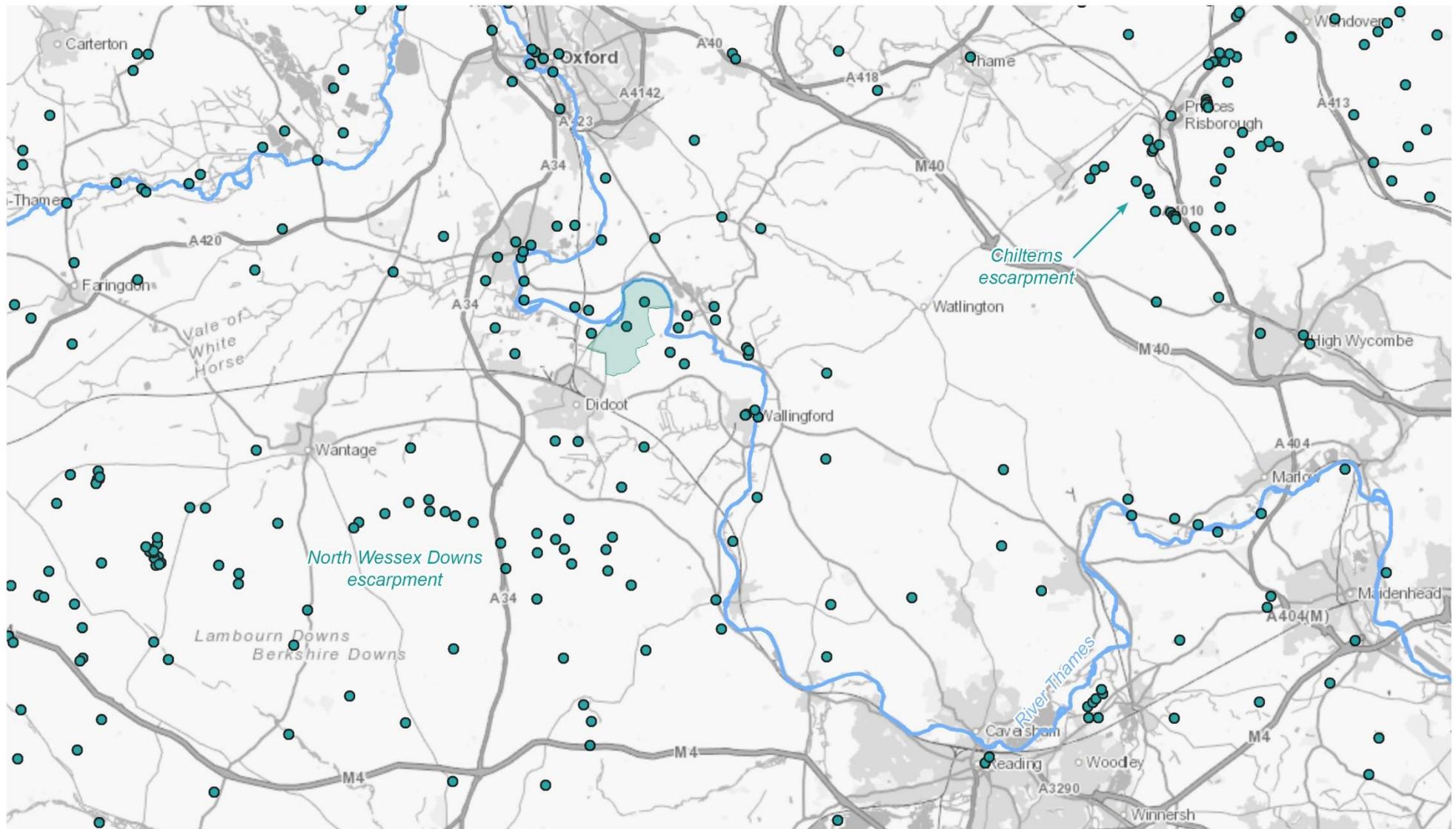
- 5.11 A second immediate consideration is the range of landscape constraints associated with the River Thames / the Thames Path, Wittenham Clumps and the wider network of public rights of way. This is a sensitive part of the Thames Valley, valued both locally – for example benefit residents of an expanding Didcot – and at a wider scale, e.g. contributing to the setting of Oxford.
- 5.12 Related factors are: A) the rural road network, characterised by limited and historic river crossings and also value to cyclists (National Cycle Network route 5 passes through the village, linking Reading to Oxford); and B) Paradise Wood is a 20th Century plantation, but still a notable feature in the landscape, given its size and proximity to Little Wittenham SSSI / the landscape scale Earth Trust initiative; there is currently no public access.
- 5.13 Thirdly, there is a need to consider the very significant historic environmental constraint affecting the village and the wider parish. Certain aspects are highly apparent upon visiting the parish, particularly the historic built form - with a historic core designated as a conservation area⁷ and complete with 39 listed buildings including the grade 1 listed parish church – but also non designated assets and wider elements of the landscape contributing to historic character and time-depth, e.g. the network of lanes/paths and historic field patterns.
- 5.14 However, what is less readily apparent is the extensive archaeological value and sensitivity of the parish and the wider landscape, namely this stretch of the River Thames corridor. This covers the period from the Palaeolithic, through the Mesolithic, Neolithic, Bronze age, Iron Age, Roman period, Anglo-Saxon period and Medieval period. A detailed overview is presented as part of a recent site-specific investigation but, in summary, the archaeological significance of the landscape is understood to relate to factors including:
- The River Thames and its soils – underlain by a geology of Thames Terrace gravels, supported very early farming and settlement.
 - Wittenham Clumps – a hillfort was established on the eastern clump, known as Castle Hill, in the Bronze Age (circa 10th Century BC), and used through the Iron Age, with settlement expanding to Dyke Hills (south of Dorchester) and lower ground (potentially indicating a shift away from defended camps) in the Iron Age.
 - Dyke Hills – the aforementioned report^{Error! Bookmark not defined.} explains that Dyke Hills “*continued to have importance into the Roman period and beyond as the development of the town at Dorchester-on-Thames testifies and indeed its continued importance (sandwiched between the Thames and the River Thame) into the early medieval period as a strategic crossing point of the Thames is further indicative of locally focussed territorial and administrative influence.*”
- 5.15 Spatial variation in sensitivity is most readily apparent in the network of nationally significant scheduled monuments – see Figures 5.2 and 5.3. However, there are also known to be many important assets, and areas of sensitivity, outside of the scheduled monuments, as understood from the Oxfordshire Historic Environment Record (HER), which is a collection of

⁷ There is no available conservation area appraisal; see the South Oxfordshire CAs webpage [here](#).

evidence gathered from aerial photography and archaeological investigation over the decades.⁸ Appendix III presents further information.

⁸ See which can be accessed at: www.oxfordshire.gov.uk/residents/environment-and-planning/archaeology/historic-environment-record

Figure 5.2: Regional clusters of scheduled monuments

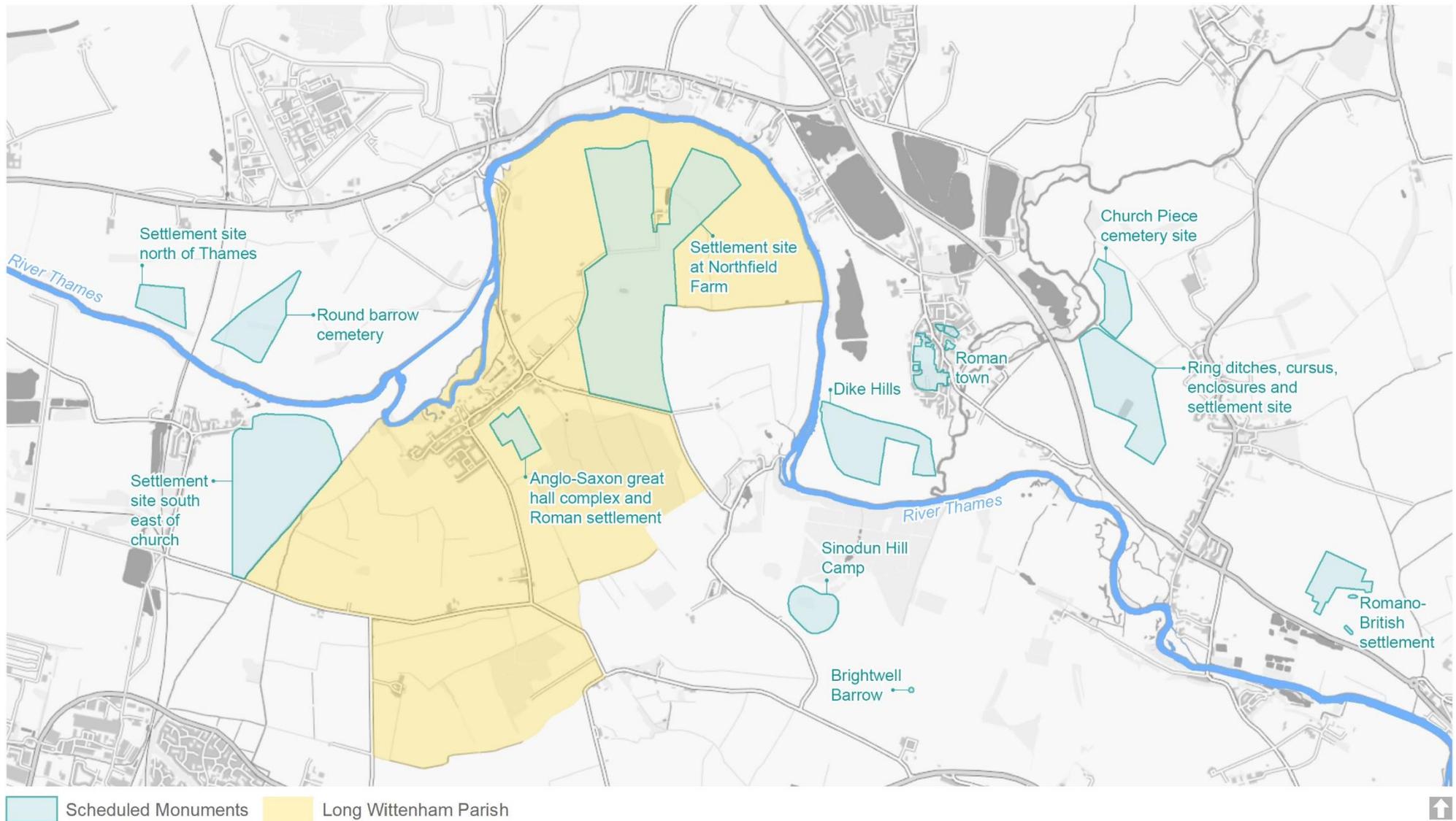


Long Wittenham Parish Boundary Scheduled Monument

Service Layer Credits: Contains OS data © Crown Copyright and database right 2020. © Historic England 2021.



Figure 5.3: Scheduled monuments within and around the parish



Service Layer Credits: Contains OS data © Crown Copyright and database right 2020. © Historic England 2021.



Site options

5.16 Having considered strategic / top down factors with a bearing on defining reasonable alternatives (i.e. alternative approaches to allocating land for new community infrastructure), the next step involved identifying and assessing the site options that are potentially in contention for allocation. Site options can be thought of as 'building blocks' for reasonable alternatives.

5.17 The long-list of potential site options comprises:

- the nine sites assessed within the Site Allocations Evidence Paper (2018) – see Figure 5.4; and
- two areas of land assessed as part of the South Oxfordshire Housing and Economic Land Availability Assessment (HELAA; 2019) – see Figure 5.5.⁹

5.18 Table 5.1 screens the eleven 'sites' in order to identify those sites that are non-starters, and hence need not be progressed for further detailed consideration.

Table 5.1: Screening site options

Site	Comments	Progress?
1: Fieldside	Gained permission (at appeal) for 36 dwellings and is under construction	No
2: Didcot Road	The preferred option within the RLWNP published and submitted in 2018/19	Yes
3: Land off unmade road to east of village		Yes
4: West Field / Saxons Heath	Examined closely through the SEA process in 2018/19	Yes
5: Wards Field	Covenant prevents development; also flood risk, biodiversity and historic environment constraint.	No
6: Bodkins playing field	Covenant prevents development; valued community infrastructure	No
7: Primary School	Was screened out in at this stage in earlier reports in 2018 and 2019	Yes
8: Village Hall	As above	Yes
9: Land off High Street		Yes
Additional land within the HELAA site west of the village	Examined closely through the SEA process in 2018/19	Yes
Additional land within the HELAA site south of the village	Flood risk zone 2 and relates poorly to the village in built form terms.	No

⁹ The HELAA (2019) is available on the South Oxfordshire Local Plan 2035 Documents and Evidence Base [webpage](#), under heading 012 HOU. Appendix II of the HELAA directs readers to maps of the sites assessed at: maps.southoxon.gov.uk/gis/

Figure 5.4: Sites assessed within the RLWNP Sites Evidence Paper (2018)

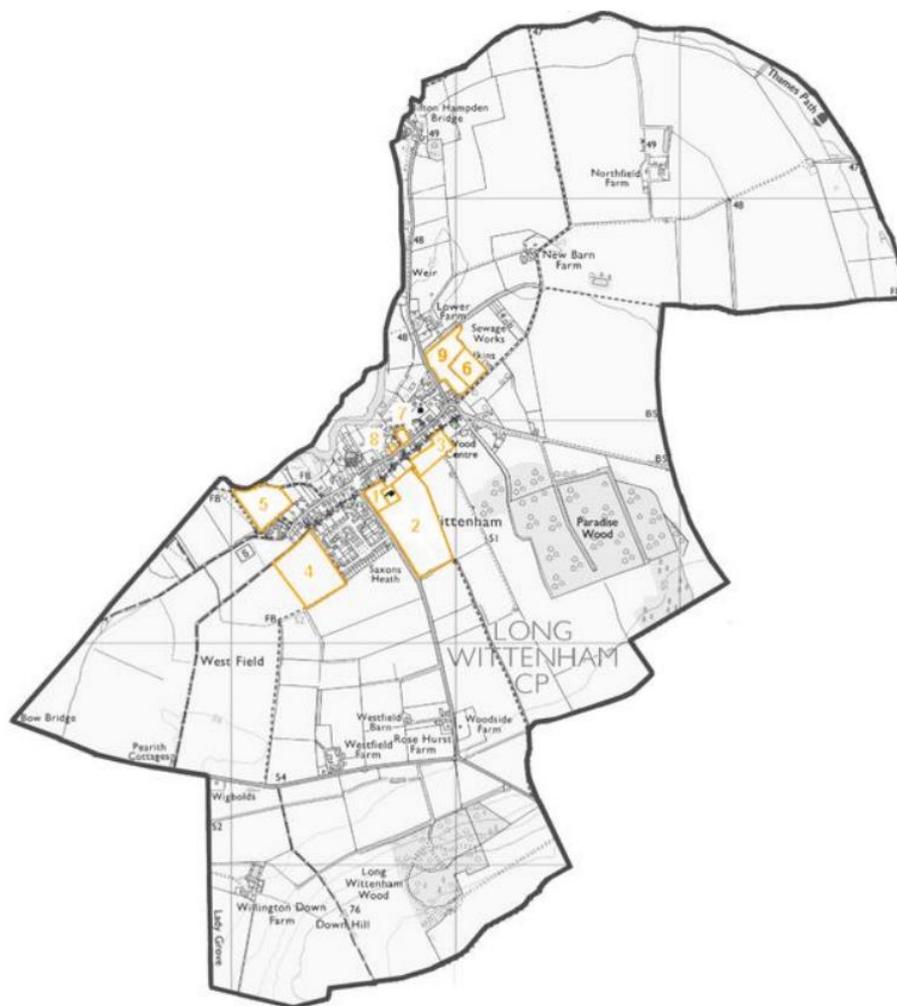
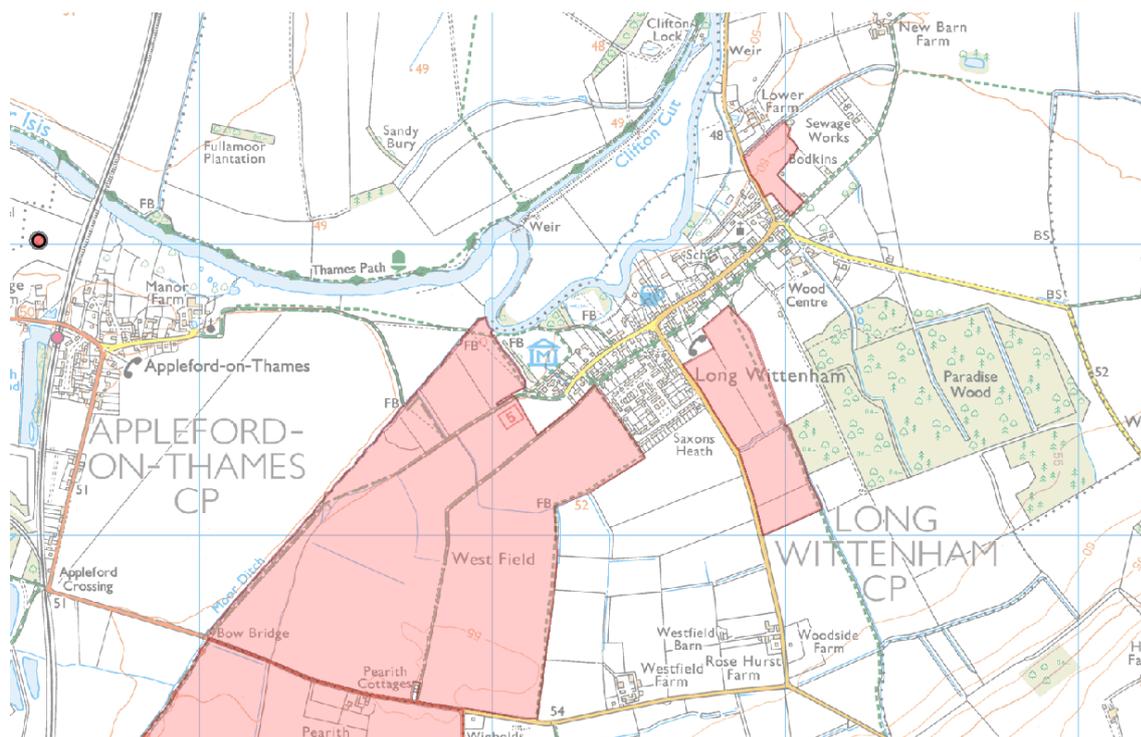


Figure 5.5: HELAA (or 'submitted') sites shown at: <http://maps.southoxon.gov.uk/gis/>



5.19 The following bullet points consider each of the nine 'progressed' sites in turn, in order to reach a decision on those to progress to the next stage:

- Site 2 – was the preferred option within the RLWNP published and submitted in 2018/19. Since that time the eastern part of the site has been designated as a scheduled monument (alongside land to the east), and detailed work has been undertaken to understand the archaeological constraint associated with the remainder of the site, but it remains **reasonable** to test the option of allocating part of this site in order to deliver new community infrastructure. Crucially, the land owner is willing to make the land available to a developer at below market rates, which greatly reduces the number of enabling houses required to facilitate a community hub onsite.
- Site 3 – is **unreasonable** because it is unavailable. Further considerations are: insufficient scale; this is a 'backland' site where good access could prove a challenge; land to the adjacent to the north of the site is constrained on account of the conservation area, a bridleway and land proposed for designation as an Ecologically Sensitive Area on account of a population of Roman Snails (potentially linked to nearby Roman settlement); there is likely to be archaeological constraint, given the adjacent scheduled monument, and given that the site falls within the extensive area to the south of the village that is identified within the HER as being associated with a 'Large multi-period cropmarked complex' (see Figure A in Appendix III).
- Site 4 – is owned by the University of Reading and is available. The option of delivering a community hub and enabling housing at this site, in combination with 'Additional land within the HELAA site west of the village' (discussed below), was examined closely through the SEA process in 2018/19, and remains a **reasonable** option for testing at the current time, on balance (see further discussion of 'reasonableness' below).
- Sites 7 and 8 – can be considered together, as they comprise the primary school and village hall respectively – see Figure 5.6. The conclusion is that both sites can be ruled out as **unreasonable**, for the following reasons:
 - As set out at paragraph 5.4, above, the County Council has consistently been unable to produce a viable plan to redevelop a new school on the site, and advice commissioned by the school governors found that re-development of the school is not financially viable. Furthermore, the site is not well-located on the high street, given a lack of space for car parking and playing fields, and the site is unable to expand.
 - With regards to the village hall, whilst there is the potential to improve or redevelop the existing facility on-site, doing so would have little bearing on the amount of land that needs to be allocated for wider community infrastructure, most notably a new primary school. Also, the current hall is not well-located on the high street, given a lack of space available for parking, leading to traffic issues at busy times.

Figure 5.6: Location of the village hall and school



- Site 9 – a recent planning application ([P18/S0752/FUL](#)) for 29 homes was withdrawn prior to determination. The proposed scheme involved leaving the northern part of the site undeveloped as green/blue infrastructure, in order to avoid development within the flood risk zone, and a similar approach would likely need to be taken as part of any future proposed scheme on the site. As such, and recognising that a school could not be developed in the flood zone, it is clearly the case that the site is far too small to deliver community infrastructure alongside sufficient enabling housing (potentially several hundred homes, given that the site is available at market rates). Furthermore, the Parish Council has concerns regarding safe access, and would not favour new community infrastructure to the east of the village, given a balance of population to the west of the village. Finally, it is important to note that the land-owner does not also own any of the other site options under consideration, so there is no potential to deliver the required community infrastructure and enabling housing across this site and another. For these reasons, the site is ruled out as **unreasonable**.
- Additional land within the HELAA site west of the village - is owned by the University of Reading and is available. The option of delivering a community hub and enabling housing here, in combination with Site 4 (discussed above; the two sites overlap), was examined closely through the SEA process in 2018/19, and remains a **reasonable** option for testing at the current time, on balance (see further discussion of 'reasonableness' below).

The reasonable alternatives

5.20 In light of the discussion above there are two reasonable alternative approaches to allocating land to deliver new community infrastructure:

- **Option 1** – would involve a new community hub and enabling housing to the south of the village, specifically at that part of **Site 2** outside of the scheduled monument. Crucially, the land owner is willing to make the land available to a developer at below market rates, such that only circa 40 – 45 enabling houses are required to facilitate a community hub onsite.
- **Option 2** – would involve a new community hub and enabling housing to the west of the village, likely to involve **Site 4 and the additional land to the west** assessed through the South Oxfordshire HELAA.⁹ This land is owned by the University of Reading, and is being actively promoted for housing. No proposal to provide land for a new primary school, or a wider community hub, has been received to date, but there presumably would be the potential to provide community infrastructure of this nature under a scenario whereby there is support for delivery of several hundred homes. It is difficult to identify a site or developable area boundary with any certainty; however, assuming the need to avoid flood risk zones, a possible developable area of circa 23 ha can be identified (N.B. this would break across field boundaries; if field boundaries were to be respected then the developable area might be reduced to circa 15ha).¹⁰ 23ha gross developable area would be unlikely to provide enough space for a new community hub and sufficient enabling housing and, in any case, it is well outside of the scope of the RLWNP to allocate land for a scheme of this scale, in light of Local Plan Policy H8. However, it is nonetheless considered appropriate to test this option as a comparator to Option 1.

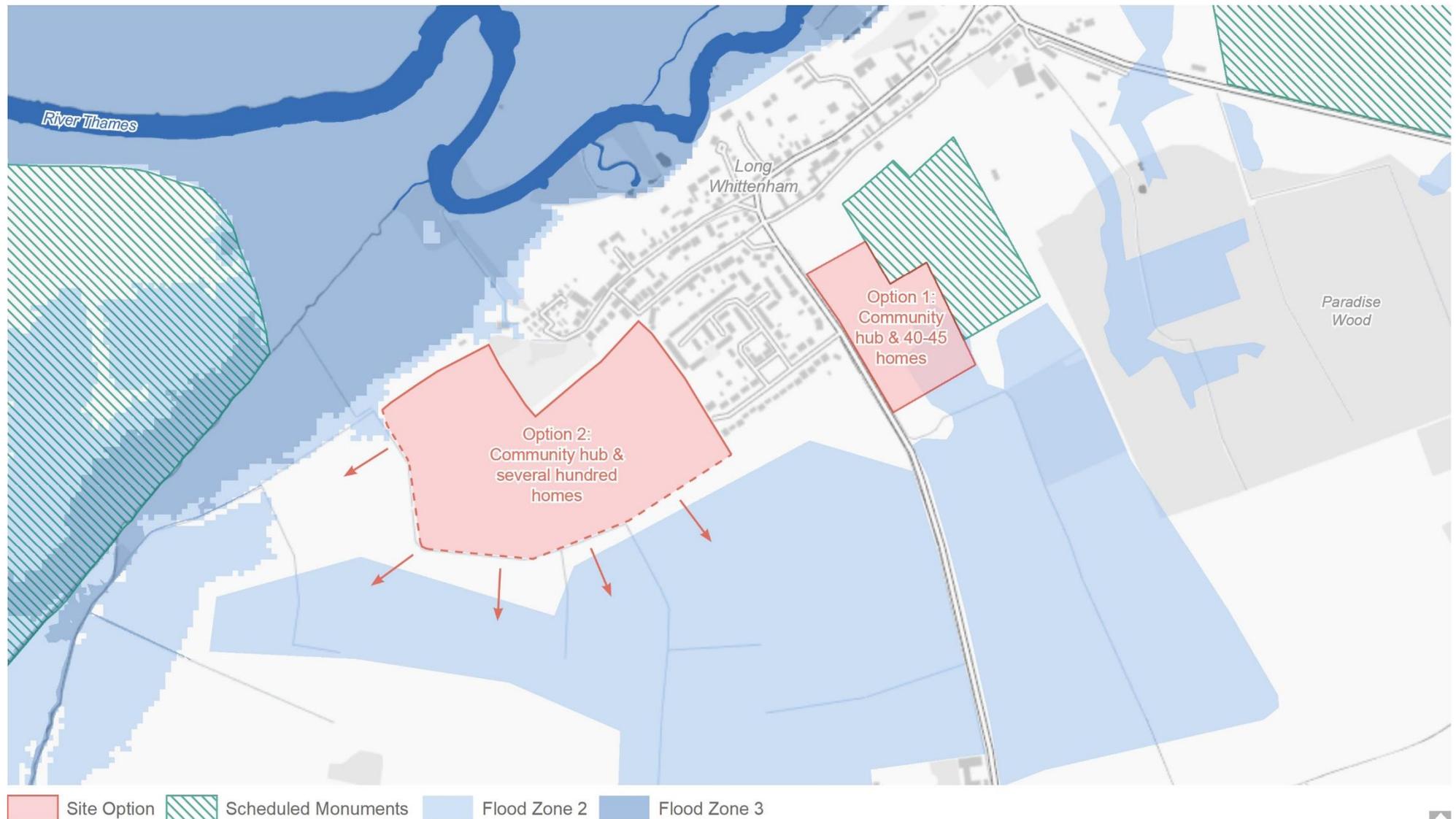
5.21 The two alternatives – both of which would involve a single site to deliver new community infrastructure alongside enabling housing – are shown in Figure 5.7.

5.22 There are three further points to note:

- Under both options the existing school and village hall sites would likely be redeveloped for housing and potentially other uses suited to a high street / village centre location, e.g. the school site would be well suited to greenspace, with the potential for a village green having been discussed.
- The do nothing, or baseline, scenario is one whereby no land for new community infrastructure is allocated through the RLWNP, and efforts continue to make best use of the existing school and village hall sites.
- The two reasonable alternatives at the current time align with those that were a focus of assessment within the Environmental Report published alongside an earlier version of the RLWNP in 2018 and its two subsequent updates. Efforts have been made to explore the possibility of other reasonable options, but no other reasonable options can be identified.

¹⁰ A scheme here could also feasibly link in with the area of play space / allotments / woodland at the western extent of the High Street (in different ownership) and/or Site 4 (discussed above).

Figure 5.7: The reasonable alternatives



Service Layer Credits: Contains OS data © Crown Copyright and database right 2020. © Historic England 2021. © Environment Agency copyright and/or database right 2020. All rights reserved.



6. Alternatives assessment

Introduction

6.1 The aim of this section is to present assessment findings in relation to the two reasonable alternatives introduced above.

Assessment findings

6.2 Table 6.1 presents assessment findings in relation to the two alternatives.

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 option 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.

Table 6.1: Alternatives assessment findings

Topic	Option 1 Community hub, and enabling housing (40-45 homes) at Didcot Road (south of the village)	Option 2 Community hub, and enabling housing (several hundred homes) west of the village)
Biodiversity	=	=
Climate change	?	?
Historic environment	1	2
Health	=	=
Landscape	1	2
Land, soil & water resources	1	2
Population & community	1	2
Transportation	1	2

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.

Discussion

An immediate point to note is that progressing either option, whilst likely to contribute significantly to the achievement of socio-economic objectives, would lead to tensions with a range of environmental (including historic environment) objectives, although all of the predicted environmental tensions and drawbacks are judged to be of limited significance.

As such, regardless of which option is judged to be preferable, it will be for the Parish Council to decide whether the socio-economic benefits outweigh the environmental drawbacks, recognising that there is also the option of not progressing with a RLWNP focused on allocating land for new community infrastructure.

The second point to note is that the assessment finds Option 1 to be preferable in terms of four topics, and does not find Option 2 to be preferable in terms of any topic, which is a strong indication that Option 1 is the preferable option overall. However, it is important to recognise that:

- a) the assessment findings are associated with a range of assumptions and uncertainties, perhaps most notably in respect of historic environment issues and impacts; and
- b) there may well be issues and objectives besides those that are a focus of the assessment that the Parish Council wishes to give weight to, when arriving at a decision on which option is preferred on balance.

Having made these initial points, the following bullet points consider the topics in turn:

- **Biodiversity** – there are limited concerns associated with either option. The northern extent of the potential growth location under Option 2 would encroach upon the river corridor, including ‘Hayward’s Eyot’ Local Wildlife Site (LWS), but there would be good potential to avoid and mitigate impacts through scheme layout etc.¹² It is also noted that Option 2 would likely involve breaching field boundaries shown on early OS maps that could have biodiversity value.

Finally, with regards to Little Wittenham Special Area of Conservation (SAC) to the east, whilst Option 1 would involve development slightly closer, the SAC would still be beyond easy walking distance, and the SAC is understood to be well-managed for access by the Earth Trust. There could be a concern regarding the quantum of new homes under Option 2 leading to problematic recreational pressure, but this is unclear (no concerns have been raised by Natural England).

- **Climate change** – the key issue here is climate change adaptation / resilience, and specifically the need to avoid land at risk of flooding, or land that might be at risk of flooding the future. In this respect, there is likely to be a risk of development encroaching upon and potentially intersecting fluvial flood risk zone 2 under both options; however, there is uncertain at the current time, as no assumptions are made regarding the layout of development under either option. Also, there is a need to consider that some low sensitivity uses can be acceptable within fluvial flood risk zone 2.

With regards to climate change mitigation, there can be opportunities for larger schemes to achieve economies of scale that lead to an opportunity to take steps towards minimising per capita emissions from the built environment. For example, larger schemes might seek to achieve operational (‘in use’) regulated emissions standards that exceed the requirements of Building Regulations (which are set to tighten over coming years, to the point where the requirement is set at the Future Homes Standard), and can be more likely to take steps towards minimising non-operational emissions, e.g. embodied carbon in building materials and emissions associated with construction. However, it is difficult to suggest that Option 2 would give rise to any significant opportunity, given the likely scale of the scheme, and also an assumption that community infrastructure would be a funding priority.

¹² Under Option 2 there could be some pressure for development to extend north to include Site 4, which is sensitive from a biodiversity perspective (see discussion at paragraph 5.17, above); however, it is difficult to assume this would be the case.

- **Historic environment** – this is a crucial issue for the assessment, in light of concerns raised by Historic England on the previous version of the RLWNP published / submitted in 2018/19, and in light of subsequent efforts to build evidence and understanding.

Beginning with Option 1, the issues and sensitivities associated with the site are discussed in detail in Appendix III. Key issues relate to the open and rural setting of the adjacent scheduled monument (there is at least one slight possible earthwork but it is otherwise below ground) and the archaeological value of the site itself, with less significant considerations relating to the setting of the village conservation area and views from Wittenham Clumps. Through recent engagement with Historic England it has been established that, on the assumption of a sensitively designed scheme:

- the level of harm to designated heritage assets would be less than substantial and should not rise above minor harm;
- there would be harm to the undesignated archaeological deposits on the site, but these assets are not likely to be of national significance, and the impact on archaeological deposits could likely be mitigated to a point of acceptability through preservation in situ by careful design, and / or archaeological investigation before or during development.

In short, Historic England are in agreement that, whilst development would lead to negative impacts, even after mitigation, these are of a significance that can be balanced against the socio economic benefits that would arise from development.

With regards to Option 2, evidence available to inform the assessment is more limited (see Appendix III); however, land here is likely constrained by:

- the setting of the village conservation area (broadly *as per* the Didcot Road site);
- the setting of Wittenham Clumps (see discussion below, under Landscape);
- the setting of the scheduled monument to the west (although the flood risk zone would ensure a landscape buffer, even under a scenario whereby the scheme extends as far as the B0146), with the Historic Environment Record (N.B. no listing information available for the scheduled monument) recording that this is an Iron Age to Roman Settlement and Bronze Age Barrow Cemetery, and that a ‘circular feature’ is “visible in NW side of field” (which is presumably some way distant from the potential development site under consideration); and
- the value of onsite archaeology, which is less well known in comparison to the Didcot Road site, due to less detailed investigation having been completed, but which could easily be of regional importance. The Historic Environment Record serves to highlight that some or many of the sensitivities associated with the Didcot Road site are also likely to apply to land west of the village, including the ‘large multi-period cropmarked complex’ that extends across much of the land south of the village, and the location of a pre-historic trackway. It also possible to draw upon analysis of cropmark data by Historic England, which suggests the presence of a large, multi-phase site of archaeological interest, including settlement and other features likely to be of Iron Age, Roman-British and potentially Early Medieval origin. It could also be that further investigation serves to highlight that the archaeological assets within the site are of national significance, but this is an unknown.

In conclusion, differentiating between the two options is challenging on the basis of some inconsistency across the available evidence. Less is known about the archaeological constraint affecting Option 2; however, on balance it is considered appropriate to highlight a greater concern with Option 2, in light of the available evidence, and because, generally speaking, this would involve a much larger scheme in a sensitive landscape.

- **Health** – there are no particular ‘health’ related issues for discussion over-and-above the matters discussed below, under the Communities heading. Road and pedestrian/cyclist safety can often be a matter warranting stand-alone consideration here; however, in this instance, there are not known to be any particular issues with either option.
- **Landscape** - the current LWNP (2018) recognises the importance of viewing corridors across the Didcot Road site (Option 1), towards Wittenham Clumps; however, the situation has now changed, due to Fieldside being under construction for 36 homes. Concerns do remain, however, recognising that scheme layout for the Didcot Road site is an unknown at this stage. As for views into the site from the Clumps, these are understood to be largely restricted by intervening tree growth.

With regards to Option 2, the scheme would be of a much larger scale, and this is a sensitive landscape in that it forms a gap between Long Wittenham and Didcot Garden Town, which is expanding (as explored in detail in the ‘Countryside’ Evidence Paper, 2021). The assumption, for the purposes of this assessment, is that development would extend west only as far as a band of fluvial flood risk zone 2, thereby leaving a landscape gap to the B4016, and Didcot beyond; however, in practice there would be pressure for / a risk of development expanding across the flood zone, as far as the road.

As well as pure settlement gap/coalescence considerations, there is a need to recognise that the land here will be appreciated by users of two or three public rights of way, including a bridleway linking Didcot Garden Town to Long Wittenham and the River Thames, which forms part of National Cycle Route 5, with clear views of Wittenham Clumps to the east. Also, it seems likely that the open agricultural landscape here could contribute to the setting of the AONB to a greater extent than land at Didcot Road, given views not only from Wittenham Clumps (albeit somewhat distant, and of uncertain significance) but also Sire’s Hill (or Down Hill) to the south. There could well be a sense of urbanisation in the landscape over-and-above Option 1, recognising that, under Option 1, new development could be contained on two sides by existing built form.

- **Land, soil and water resources** – a key consideration is loss of best and most versatile agricultural land, with the low resolution nationally available dataset (available at www.magic.gov.uk) indicating that much of the land in the vicinity is of Long Wittenham is likely to be best and most versatile (specifically grade 2, where grades 1, 2 and 3a are classified as best and most versatile, BMV). However, there is little certainty, as neither site has been surveyed in detail, and some nearby land (on the edge of Didcot, so in relative proximity to land west of Long Wittenham) has been surveyed in detail and found to comprise land that is of grade 3b quality (i.e. non-BMV). In light of these points, there is an argument for highlighting a concern with Option 2, as this would involve a larger loss of agricultural land that is potentially of BMV quality.

Secondly, it is important to note that all land south of Long Wittenham falls within a Minerals Safeguarding Area and an area safeguarded for sharp sand and gravel, as understood from the adopted Oxfordshire Minerals and Waste Core Strategy (2017; see the Policy Map [here](#)). The designation is a constraint to both options; however, in practice, it is thought unlikely that minerals excavation is a realistic option for land at Didcot Road (Option 1), given proximity to the village. It could well be an option for land to the west of Long Wittenham (Option 2); however, there could be the potential to extract minerals ahead of development (although this could delay the delivery of much needed new community infrastructure).

Overall, in respect of this topic, it is fair to highlight a preference for Option 1. It is important to recall that under this option the landowner is proposing to make a high proportion of the site available for community infrastructure, such that the number of enabling homes needed is a fraction of that that would be necessitated under Option 2, thereby serving to minimise the extent of greenfield loss within a sensitive broad area.

- **Population and community** – there are a number of factors to consider:
 - The key point to note is that whilst either option would deliver a new community hub, Option 2 would potentially more than double the size of the village, and risk coalescence with Didcot, and therefore greatly impact the sense of place, and potentially the sense of community, experienced by the village's residents.
 - Related to the above, it is important to consider that options for a community hub south of the village have now been widely discussed, and explored with residents, for over a decade, such that a dramatic change of tack now would risk widespread consternation.
 - Also related to point 1, there is also a need to consider the importance of access to high quality countryside, and Long Wittenham as an attractive historic village (with two pubs) to the residents of Didcot Garden Town.
 - Whilst Option 2 would deliver a large volume of housing, there is little or no evidence to suggest that this housing is needed.
 - Option 2 would locate the community hub at the western extent of the village, which is a less accessible location, albeit it would be easily accessible to residents of the exiting housing area at the western edge of the village. Conversely, Option 1 would deliver the new hub at a central location, such that it would effectively form a focal point for the village.
- **Transportation** – either option would support the relocation of the school and village hall away from the High Street, which is a key objective from a transport (traffic) perspective. However, under Option 2 there is little certainty regarding the precise access and road infrastructure (also walking/cycling infrastructure) that would be necessary, achievable and viable.

7. The preferred option

Introduction

- 7.1 The aim of this section is to present the Parish Council's reasons for supporting the preferred option, in light of the scenarios assessment presented above.

Reasons for supporting the preferred approach

- 7.2 The Parish Council provided the following text:

“Option 1 is the Parish Council’s preferred option, in light of the assessment, which shows this option to perform well relative to Option 2.

It is recognised that there are a range of issues and likely impacts associated with Option 1; however, there will be the potential to avoid and mitigate impacts through the development management process, guided by policy within the RLWNP. There may nonetheless be residual negative impacts, perhaps most notably in respect of the historic environment, but the Parish Council believes that these are likely to be outweighed by the community benefits that will result from delivering a new community hub, and enabling the relocation of the school and village hall away from their current locations on the High Street.

There is no other ‘do something’ option for the RLWNP, as there is little or nothing that the plan can do to enable a successful redevelopment of the existing school site. The only other option for the Parish Council would be to not progress with a RLWNP focused on the allocation of land for community infrastructure, but this option is not favoured because of a well understood need to proactively take steps to address the current issues with the school and village hall.

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

8. Introduction (to Part 2)

8.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the current 'pre-submission' version of the RLWNP.

Overview of the RLWNP

8.2 The centrally important policy is LW1 (Community Hub), which allocates a site known as Didcot Road for a community hub and enabling housing (40-45 homes), and establishes site specific policy on a range of matters.

8.3 This policy is then supplemented by five thematic development management policies, i.e. policies that would apply to any planning application that comes forward within the Parish.

8.4 Finally, there is a need to note Policy LW2 (Safeguarded sites), which sets out the form of redevelopment that would be supported at the current school and village hall sites, if and when the current uses onsite become redundant on account of the new community hub having been delivered. This policy is not a focus of the assessment below, because there is little question that the sites would be suited to redevelopment under such a scenario, and the precise nature of redevelopment on these small sites is not a matter that warrants detailed scrutiny under the SEA framework. There is no reason to suggest any alternative form of redevelopment (e.g. more or less intensive) to that which is proposed by the policy.

Assessment methodology

8.5 The assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping (see **Table 3.2**) as a methodological framework.

8.6 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.

8.7 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 Neighbourhood Plan 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. Appraisal of the RLWNP

- 9.1 A discussion is presented under each of the thematic headings that together comprise the core of the SEA framework (see Section 3).

Biodiversity

- 9.2 There are no European or nationally designated sites for biodiversity within the Plan area. However the Little Wittenham Special Area of Conservation (SAC) and Site of Special Scientific Interest (SSSI) is located just outside of the Plan area in the east, and the entire Plan area falls within this site's associated SSSI Impact Risk Zone (IRZ). In the local context, there are also two Local Wildlife Sites located in the north / north-east of the Plan area.
- 9.3 The proposed Didcot Road allocation (Policy LW1) gives rise to limited concerns, with no priority habitat within or adjacent to the site, and development set to be contained within a single agricultural field, thereby supportive of retaining the existing hedgerows. The SAC would be beyond easy walking distance.
- 9.4 Policy LW7 (Ecologically Sensitive Areas) is also of note. The policy identifies an Ecological Sensitive Area to the south of Fieldside, and requires development to fully assess potential ecological impacts and propose mitigation (specifically seeking the creation and linking of habitats) when it is likely to affect either this Ecological Sensitive Area or the Little Wittenham SAC/SSSI.
- 9.5 In **conclusion**, whilst Policy LW7 is supported, broadly neutral effects are predicted overall.

Climate change

- 9.6 The key issue here is climate change adaptation / resilience, and specifically the need to avoid land at risk of flooding, or land that might be at risk of flooding the future. In this respect, there is thought likely to be a risk of development encroaching upon and potentially intersecting fluvial flood risk zone 2, which intersects the south east of the site; however, there is little or no certainty at the current time, as no assumptions are made regarding the layout of development under either option. Also, there is a need to consider that some low sensitivity uses can be acceptable within fluvial flood risk zone 2.
- 9.7 With regards to climate change mitigation, it is thought unlikely that development will give rise to particular opportunities to minimise per capita emissions from the built environment, given the scale of the scheme and other funding priorities, notably community infrastructure and affordable housing. With regards to per capita emissions from transport the proposed scheme is judged to perform well, given that its location at the centre of the village.
- 9.8 With regards to the site specific policy (Policy LW1), the key point to note is a requirement for: *“Cycle and footpath linkages to the surrounding adopted, permitted and proposed network, maximising the potential of Footpath 287/5 to provide links between the site and the village centre and the countryside.”*

9.9 Policy LW5 (Cycle and Footpaths) is also of note. It requires development contributions towards cycle and footpath proposals (as contained within the Evidence Paper: Cycle and Footpaths).

9.10 In conclusion, it is appropriate to ‘flag’ an uncertain risk of **negative effects** at this stage, given the fluvial flood risk issue. There is likely to be good potential to take a sequential approach to avoiding sensitive uses in flood risk zone 2, in line with proposed RLWNP Policy LW1 and Local Plan Policy EP4 (Flood Risk), but there is a degree of uncertainty at this stage.

Health and wellbeing

9.11 With regards to the proposed community hub, this is clearly a positive intervention from a ‘health’ perspective, with site specific policy setting out the need for, amongst other things: *“Open space provision, including the playing fields and the open space associated with the housing portion of the site, [which] should relate to and compliment provision made at Fieldside, and to provision in the wider village with the aim of providing a variety of open spaces that can serve different recreational and amenity purposes.”*

9.12 There are no other particular ‘health’ related issues for discussion over-and-above the matters discussed below, under the Communities heading. Road and pedestrian/cyclist safety can often be a matter warranting stand-alone consideration here, under the Health headings; however, in this instance, there are not known to be any particular issues.

9.13 In **conclusion**, the proposed new community hub is supported from a health perspective, and so positive effects are predicted.

Historic environment

9.14 This is a crucial issue for the assessment, in light of concerns raised by Historic England on the previous version of the RLWNP published / submitted in 2018/19, and in light of subsequent efforts to build evidence and understanding.

9.15 The issues and sensitivities associated with the site are discussed in detail in Appendix III. Key issues relate to the open and rural setting of the adjacent scheduled monument (there is at least one slight possible earthwork but it is otherwise below ground) and the archaeological value of the site itself, with less significant considerations relating to the setting of the village conservation area and views from Wittenham Clumps. Through recent engagement with Historic England it has been established that, on the assumption of a sensitivity designed scheme:

- the level of harm to designated heritage assets would be less than substantial and should not rise above minor harm;
- there would be harm to the undesignated archaeological deposits on the site, but these assets are not likely to be of national significance, and the impact on archaeological deposits could likely be mitigated to a point of acceptability through preservation in situ by careful design, and / or archaeological investigation before or during development..

9.16 In short, Historic England are in agreement that, whilst development would lead to negative impacts, even after mitigation, these are of a significance that can be balanced against the socio economic benefits that would arise from development. There naturally remains a degree of uncertainty, this stage, because further excavation could always highlight sensitivities over-and-above what is currently understood to exist, but this can be addressed at the planning application / development management stage.

9.17 With regards to the site specific policy (Policy LW1), the key point to note is a requirement for a “*Heritage Appraisal and Impact Assessment proportionate to the significance of the designated and non-designated assets and archaeological remains should inform proposals in accordance with national policy.*” With regards to specific matters that should be a focus of the Appraisal/Assessment, there has been detailed discussion with Historic England, who reviewed an early draft of the policy before recommending that it should be strengthened to read:

“The layout and design of development is demonstrated to preserve remains of archaeological interest that have been identified within the site in-situ, giving the highest priority to remains that contribute to the significance of the adjacent scheduled monument. This should include the siting of areas of open space within the development to preserve such remains from disturbance where possible. A construction management plan will be required to ensure these areas are not disturbed during the construction process, whilst a management plan for open space following construction will be required to ensure they are appropriately maintained. Where the loss of remains of archaeological interest is unavoidable and justified based on the public benefits that would arise an appropriate record should be made prior to their loss to a level of detail agreed with the Council’s archaeological advisor. The findings of any investigation and recording, along with those from previous investigations should be made available to the public through an interpretation strategy, including on-site measures that should be agreed as a condition of consent. The layout, landscaping and scale, materials and form of buildings will be designed to minimise harm to the setting of the scheduled monument as well as exploring opportunities to emphasise the importance of the monument as a site of national archaeological interest”

9.18 The Policy was subsequently updated to take full account of this recommendation.

9.19 Policy LW7 (Heritage and Design) is also of note. It identifies a number of considerations for new development, including; historic context, preservation and enhancement of all identified assets of value, whether designated or not, the conservation area, listed buildings, the War Memorial, Thames Path and Riverside, the countryside, protected views, local distinctiveness and sense of place, and historic built form of the village.

9.20 In **conclusion**, there are clear historic environment issues and sensitivities; however, through recent engagement with Historic England it has been established that historic environment constraint is not a ‘show-stopper’ and whilst development would lead to negative impacts, these are justifiable with the adoption of appropriate mitigation. The views of Historic England will be sought again through the current consultation, but at this stage it is appropriate ‘flag’ a likelihood of minor or modest **negative effects**.

Landscape

9.21 This is also a key issue for the RLWNP, particularly recognising that the parish is located on the border of the North Wessex Downs, a designated Area of Outstanding Natural Beauty of which the Wittenham Clumps form a part. The Clumps (also known as the Sinodun hills) afford 360-degree views of the surrounding countryside and can be seen from several locations within the village. There are also wider landscape sensitivities, as set out in a Character Assessment prepared in 2016 in support of the LWNDP, also supplemented by a Countryside Evidence Paper prepared in 2018.

9.22 With regards to the proposed community hub and enabling housing scheme, the current LWNP (2018) recognises the importance of viewing corridors across the site, towards Wittenham Clumps; however, the situation has now changed, due to Fieldside being under construction for 36 homes. Concerns regarding views of Wittenham Clumps do remain, given that the scheme layout for the Didcot Road is an unknown at this stage, and there is also a need to consider views from the Clumps (understood to be largely restricted by intervening tree growth); however, Policy LW1 requires that any scheme *“shall be subject to a masterplan and design brief to be agreed with the local planning authority.”* The policy also goes on to explain, amongst other things, that the masterplan should address *“innovative and attractive design... complementing the unique character of Long Wittenham as described in Evidence Papers: Character Assessment and Countryside.”*

9.23 The RLWNP also presents two thematic policies of note:

- Policy LW3 (Heritage and Design) requires: *“All new development should preserve and enhance the overall character and appeal of Long Wittenham parish as described in Evidence Papers: Character Assessment and Countryside.”* The policy also goes on to require that design decisions reflect, amongst other things, historic context, protected views and local distinctiveness.
- Policy LW4 (Protected Views) defines protected views and seeks to prevent schemes leading to obstruction or detriment of these from defined vantage points. Where development has the potential to cause harm to a protected view, the proposal should *“seek to retain its visual integrity and will be required to undertake a full Landscape and Visual Impact Assessment for this purpose.”*

9.24 In **conclusion**, whilst the proposed community hub and housing allocation does give rise to certain tensions with landscape objectives, the proposed site specific and thematic development management policy framework serves to alleviate concerns. As such, and on balance, **neutral effects** are predicted.

Land, soil and water resources

9.25 A key consideration is loss of best and most versatile agricultural land, with the low resolution nationally available dataset (available at magic.gov.uk) indicating that much of the land in the vicinity is of Long Wittenham is likely to be best and most versatile (specifically grade 2, where grades 1, 2 and 3a are classified as best and most versatile). However, the quality of agricultural land at the Didcot Road site is not known with any certainty, as it has not been surveyed in detail.

- 9.26 Secondly, it is important to note that all land south of Long Wittenham falls within a Minerals Safeguarding Area and an area safeguarded for sharp sand and gravel, as understood from Local Plan policy EP5). The designation is a notable constraint; however, in practice it is not thought likely that minerals excavation is a realistic option for land at Didcot Road, given proximity to the village. This view has been confirmed by the Minerals Planning Authority.
- 9.27 In **conclusion**, it is appropriate to ‘flag’ minor or moderate **negative effects**, given the likelihood of the Didcot Road site comprising best and most versatile agricultural land, and also noting the minerals issue.

Population and community

- 9.28 The proposed community hub allocation is strongly supported from a ‘community’ perspective, because it will serve to address a range of well understood issues associated with the current school and village hall facilities in their current locations (see discussion above at paragraph 5.4). Furthermore, the new hub should lead to an expanded range of facilities within the village, including increased playing fields, and new parking space for the village. Options for a community hub south of the village have now been widely discussed, and explored with residents, for over a decade.
- 9.29 The new housing that will be delivered is also supported, from a communities perspective, albeit there is limited evidence of existing local housing needs. Importantly, Policy LW1 clarifies that the scheme should “include affordable housing as required in Local Plan Policy H9”, which is an important point of clarification, noting the inherent viability challenges with the scheme (i.e. recognising that a very high proportion of the site is being made available for community uses, i.e. uses that will not generate a profit for the land-owner).
- 9.30 Finally, there is a need to consider the location of the site, with the broad conclusion being that it is very well located, from a communities perspective. It is clearly central to the village, and Policy LW1 includes a strong emphasis on: *“Cycle and footpath linkages to the surrounding adopted, permitted and proposed network, maximising the potential of Footpath 287/5 to provide links between the site and the village centre and the countryside.”*
- 9.31 In **conclusion**, the RLWNP takes a highly proactive approach to addressing existing community infrastructure issues affecting the village, and so it is certainly appropriate to predict the likelihood of **significant positive effects**.

Transport

- 9.32 The proposed new community hub would support the relocation of the school and village hall away from the High Street, which is a key objective from a transport (traffic) perspective. With a view to fully realising this opportunity, proposed site specific policy (LW1) includes a focus on cycle and footpath links (discussed above) and also sets out the following expectation: *“Parking and circulation in the scheme will lead to an overall increase in sustainable transport choices and a reduction in congestion in the village.”*
- 9.33 Two proposed thematic development management policies are also of note:

- Policy LW5 (Cycle and Footpaths) – requires that: “*Where development leads to increased demand for sustainable transport as set out in Development Plan policies, proposals should consider how they could make a proportionate contribution to the proposals set out in Evidence Paper: Cycle and Footpaths.*” The policy then goes on to identify specific priority routes that should be a focus of investment.
- Policy LW6 (Off-street parking) – clarifies that: “*New development should accommodate its parking needs off-street in accordance with adopted parking standards.*”

Conclusions

9.34 The assessment predicts significant positive effects in terms of Population and communities objectives, given the clear merit in the proposed new community hub (and enabling housing) scheme, but serves to highlight tensions with certain environmental objectives, namely:

- Climate change – flood risk is extensive in the area, and flood risk zone 2 does intersect the proposed Didcot Road allocation site;
- Historic Environment – this is the centrally important issue for the RLWNP, with the primary considerations relating to on-site archaeology within the Didcot Road site and the setting of the adjacent scheduled monument; and
- Land, soils and natural resources – as the Didcot Road site is likely to comprise best and most versatile agricultural land, and also falls within a broad area safeguarded for potential minerals extraction.

9.35 It is for the plan-makers to consider if and how these tensions can be addressed or reduced ahead of the plan being finalised.

Part 3: What are the next steps?

10. Next steps

Plan finalisation

- 10.1 This Further Environmental Report Update is published for consultation alongside a revised draft of the RLWNP, in order to inform the consultation.
- 10.2 Subsequently steps will be taken to finalise the RLWNP, taking account of this report, consultation responses and any other new and updated evidence.
- 10.3 It will then be for an Independent Examiner to explore whether the RLWNP meets the Basic Conditions for Neighbourhood Plans, and to confirm that it is in general conformity with the Local Plan.
- 10.4 If the Independent Examination is favourable, the RLWNP will be subject to a referendum. If more than 50% of those who vote agree with the RLWNP, then it will be 'made'. Once made, the RLWNP will become part of the Development Plan for South Oxfordshire District.

Monitoring

- 10.5 The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report.
- 10.6 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).
- 10.7 The SEA has not identified any potential for significant negative effects that would require closer monitoring, led by the Parish 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 AI.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. The ‘SEA framework’ – the outcome of scoping – is presented within Chapter 3 (‘What is the scope of the SEA?’). More detailed messages, established through a context and baseline review are also presented in Appendix II of this report.
3. The environmental characteristics of areas likely to be significantly affected;	
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.;	
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 the Parish Council’s ‘reasons for supporting the preferred approach’, i.e. explains how/ why the preferred approach is justified in light of alternatives assessment.
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, e.g. timescale.
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. Also, Chapter 9 explains how a recommendation was made through the assessment of a working draft version of the RLWNP that has now been actioned.

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 explains the Parish Council's 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 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 report is published for consultation alongside the RLWNP in order to inform the 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 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.

Biodiversity

There are no biodiversity sites within the Neighbourhood Plan area which have been designated at a national, European or international level. This includes Sites of Special Scientific Interest (SSSIs) although the majority of the Neighbourhood Plan area falls within SSSI Impact Risk Zones. In terms of locally designated sites there are two Local Wildlife Sites (LWSs) within the Neighbourhood Plan area.

A variety of Biodiversity Action Plan Priority Habitats are present in the Neighbourhood Plan area, including Deciduous Woodland, Reedbeds, Lowland Meadows, and Good quality semi-improved grassland.

Key context documents include -

- EU Biodiversity Strategy (May 2011)
- National Planning Policy Framework (NPPF)
- The Natural Environment White Paper (NEWP) (2012)
- The 25 Year Environment Plan (2018)
- Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011)
- Oxfordshire's Biodiversity Action Plan (2015)
- The South Oxfordshire Local Plan

In light of this discussion, and supplementary discussion within the Scoping Report (2018), the following objective was established, along with a series of supplementary assessment questions -

Protect and enhance all biodiversity and geological features

- Protect and enhance semi-natural habitats?
- Protect and enhance priority habitats, and the habitat of priority species?
- Achieve a net gain in biodiversity?
- Support enhancements to multifunctional green infrastructure networks?
- Support access to, interpretation and understanding of biodiversity?

Climate change

Any increases in the built footprint of the Long Wittenham neighbourhood plan area (associated with the delivery of new housing and employment land) has the potential to increase overall greenhouse gas emissions. In this context, data has shown that between 2005 and 2015 South Oxfordshire has had higher industry and commercial per capital emissions than the South East of England and England. However, domestic and transport emissions per capital in South Oxfordshire have been lower than in the South East of England and England during the period from 2005 to 2015.

In terms of flood risk, there are areas of land, particularly in the north, east, and central parts of the neighbourhood plan area, which are located in Flood Zone 2 and Flood Zone 3. Surface water flood risk is higher in the northern, eastern and central areas of the neighbourhood plan area, particularly around the River Thames.

The Long Wittenham neighbourhood plan should seek to increase the neighbourhood plan area's resilience to the effects of climate change by supporting and encouraging adaptation strategies.

Key context documents include -

- UK Climate Change Risk Assessment Report (2017)
- Climate Change Act (2008)
- National Planning Policy Framework (NPPF) (2012)
- Flood and Water Management Act (2010)
- The South Oxfordshire Local Plan

In light of this discussion, and supplementary discussion within the Scoping Report (2018), the following objectives were established, along with a series of supplementary assessment questions -

Reduce the level of contribution to climate change made by activities within the Neighbourhood Plan area	<ul style="list-style-type: none"> • Limit the number of journeys made and reduce the need to travel? • Promote the use of sustainable modes of transport, including walking, cycling and public transport? • Increase the number of new developments meeting or exceeding sustainable design criteria? • Generate energy from low or zero carbon sources? • Reduce energy consumption from non-renewable resources?
Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding	<ul style="list-style-type: none"> • Ensure that inappropriate development does not takes place in areas at higher risk of flooding, taking into account the likely future effects of climate change? • Improve and extend green infrastructure networks in the plan area to support adaptation to the potential effects of climate change? • Sustainably manage water run-off, reducing surface water runoff (either within the plan area or downstream)? • Ensure the risks associated with climate change are considered through new development in the Neighbourhood Plan area? • Increase the resilience of biodiversity to the effects of climate change, including through enhancements to ecological networks?

Health and wellbeing

Overall health and wellbeing in the neighbourhood plan area is generally good. The majority of residents within the Neighbourhood Plan area consider themselves to have 'very good health' or 'good health', higher than the totals for South Oxfordshire District, the South East of England and England. Additionally, a greater proportion of residents within Long Wittenham report that their activities are not limited by disability, compared to South Oxfordshire, the South East of England and England.

Key context documents include -

- National Planning Policy Framework (NPPF) (2012)
- The 25 Year Environment Plan (2018)
- The Marmot Review (2011)
- Joint Strategic Needs Assessment Report (2017)
- The South Oxfordshire Local Plan

In light of this discussion, and supplementary discussion within the Scoping Report (2018), the following objective was established, along with a series of supplementary assessment questions -

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

Historic environment

The neighbourhood plan area has a rich historic environment, recognised through the 39 Listed Buildings, two Scheduled Monuments, and Long Wittenham Conservation Area. Further discussion is presented in **Appendix III**.

Key context documents include -

- National Planning Policy Framework (NPPF) (2012)
- The 25 Year Environment Plan (2018)
- The Government's Statement on the Historic Environment for England (2010)
- The South Oxfordshire Local Plan

In light of this discussion, and supplementary discussion within the Scoping Report (2018), the following objective was established, along with a series of supplementary assessment questions -

<p>Protect, maintain and enhance the cultural heritage resource within the Neighbourhood Plan area, including the historic environment and archaeological assets.</p>	<ul style="list-style-type: none"> • Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and non-designated, and their setting? • Conserve and enhance the special interest, character and appearance of the Long Wittenham Conservation Area and its setting? • Support the integrity of the historic setting of key buildings of heritage interest? • Conserve and enhance local diversity and character? • Support access to, interpretation and understanding of the historic environment? • Conserve and enhance archaeological remains, including historic landscapes? • Support the undertaking of archaeological investigations and, where appropriate, recommend mitigation strategies.
---	--

Landscape

The Long Wittenham neighbourhood plan area falls within the 108 Upper Thames Clay Vales NCA. The upper Thames Clay Vales NCA is described as a broad belt of open, gently undulating lowland farmland on predominantly Jurassic and Cretaceous clays. Blenheim Palace World Heritage Site falls within the NCA, along with around 5,000 ha of the North Wessex Downs Area of Outstanding Natural Beauty (AONB) and smaller areas of the Chilterns AONB and the Cotswolds AONB.

Key context documents include -

- National Planning Policy Framework (NPPF) (2012)
- The 25 Year Environment Plan (2018)
- The Government's Statement on the Historic Environment for England (2010)
- The South Oxfordshire Local Plan

In light of this discussion, and supplementary discussion within the Scoping Report (2018), the following objective was established, along with a series of supplementary assessment questions -

<p>Protect and enhance character and quality of land and townscapes, in particular the setting of the AONB</p>	<ul style="list-style-type: none"> • Support the integrity of local landscape character? • Conserve and enhance landscape and townscape features? • Conserve and enhance the setting of the AONB?
--	--

N.B. the 'landscape' objective and assessment questions were edited subsequent to the scoping consultation, to reflect comments received from **Natural England**. The relevant SEA objective has been amended and now reads as follows; 'Protect and enhance character and quality of land and townscapes, in particular the setting of the AONB'. The following assessment question has also been added; will the option/proposal help to conserve and enhance the setting of the AONB?

Land, soil and water resources

The River Thames is the main watercourse flowing alongside the neighbourhood plan area. There is land classified as the Best and Most Versatile Agricultural Land present in the majority of the Neighbourhood Plan area, and the neighbourhood plan area is also covered by a Nitrate Vulnerability Zone for surface water. The land surrounding the settlement edge is designated as a Minerals Strategic Resource Area and Mineral Consultation Area for its potential contributions to soft sand supplies.

Key context documents include -

- EU Soil Thematic Policy (2006)
- National Planning Policy Framework (NPPF) (2012)
- Safeguarding our Soils: A strategy for England (2009)
- The South Oxfordshire Local Plan

In light of this discussion, and supplementary discussion within the Scoping Report (2018), the following objectives were established, along with a series of supplementary assessment questions -

Ensure the efficient and effective use of land.	<ul style="list-style-type: none"> • Promote the use of previously developed land? • Avoid the development of the best and most versatile agricultural land?
Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste.	<ul style="list-style-type: none"> • Limit the amount of waste produced and support the minimisation, reuse and recycling of waste? • Maximise opportunities for local management of waste in order to minimise export of waste to areas outside? • Encourage recycling of materials and minimise consumption of resources during construction?
Use and manage water resources in a sustainable manner.	<ul style="list-style-type: none"> • Support improvements to water quality? • Minimise water consumption? • Protect groundwater resources?

Population and community

Based on the most recent census data available, the population of the Neighbourhood Plan area decreased between 2001 and 2011, in contrast to the increases observed for South Oxfordshire, the South East of England, and England.

There is one Lower Super Output Areas (LSOA) covering the Neighbourhood Plan area: E01028607: South Oxfordshire 006C, which is within the top 30% least deprived in England. Households within the neighbourhood plan area are relatively not deprived in comparison to district, regional and national averages.

In terms of house ownership, the majority of residents within the Neighbourhood Plan area own a household either outright or by mortgage (80.56%). This is at a higher rate than the district, regional, and national averages. There is also a higher proportion of highly qualified residents in the neighbourhood plan area, and a high

percentage of residents which work in the three highest occupational tiers. This again is compared with regional and national comparators.

Key context documents include -

- National Planning Policy Framework (NPPF) (2012)
- The ‘Ready for Ageing?’ Report (2013)
- The 25 Year Environment Plan (2018)
- The South Oxfordshire Local Plan

In light of this discussion, and supplementary discussion within the Scoping Report (2018), the following objectives were established, along with a series of supplementary assessment questions -

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

Transportation

In terms of public transport, there are no railway stations located within the Neighbourhood Plan area. The nearest is Appleford Train Station, located approximately 2km away. Additionally, the National Cycle Route 5 runs through the Neighbourhood Plan area. The reading to Oxford section of this cycle route passes through Wallingford, Didcot and Abingdon.

Over 94% of residents within the Neighbourhood Plan area have access to a car or van, perhaps in part due to the rural setting of Long Wittenham. A high proportion of residents therefore use a car or van to get to work. This is higher than the district, regional and national percentages. As such, there are issues of peak time congestion within the village centre, particularly along High Street.

Key context documents include -

- National Planning Policy Framework (NPPF) (2012)
- Connecting Oxfordshire: Local Transport Plan (2016)
- The South Oxfordshire Local Plan

In light of this discussion, and supplementary discussion within the Scoping Report (2018), the following objective was established, along with a series of supplementary assessment questions -

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

Appendix III: Historic environment

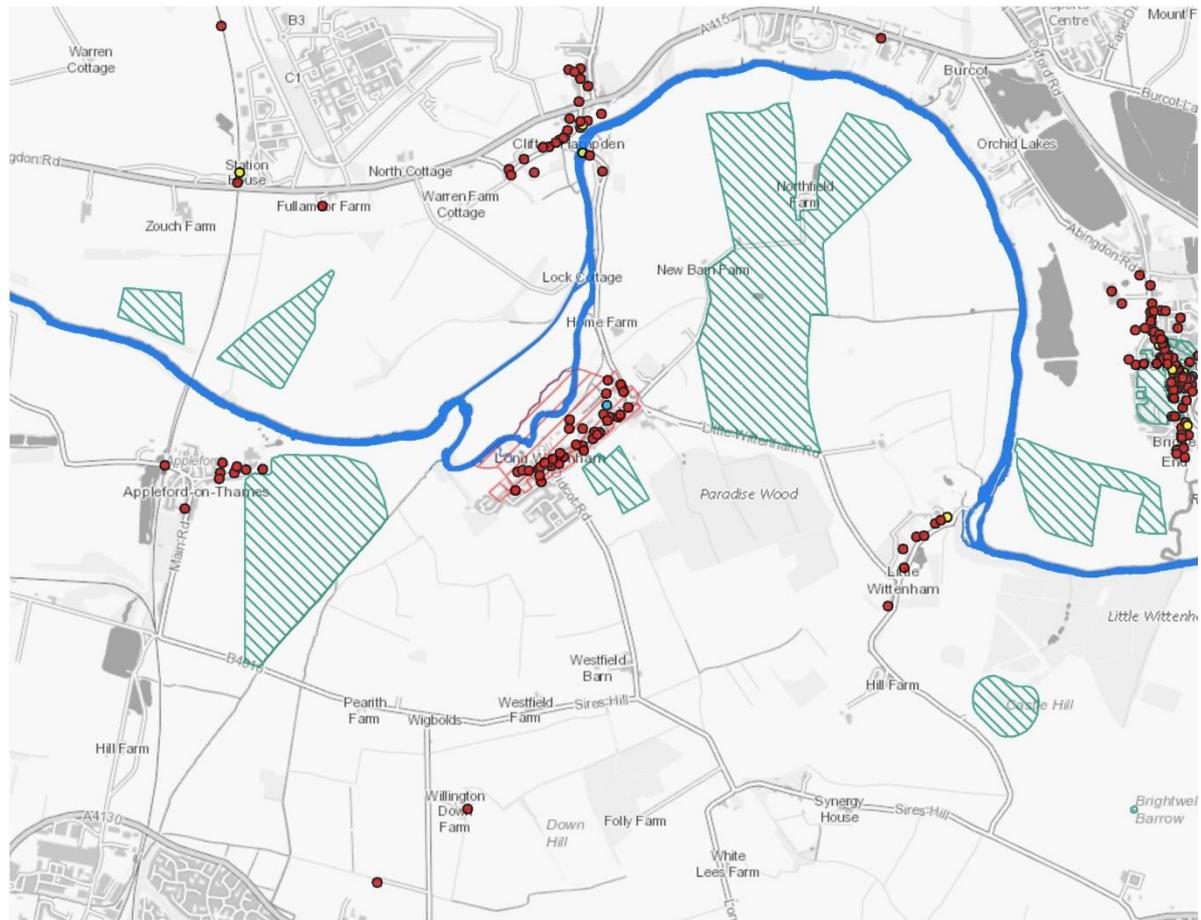
Introduction

This appendix firstly presents a series of maps to highlight historic environment issues and sensitivities with a bearing on the RLWNP, including maps showing data from the Oxfordshire Historic Environment Record (HER).

It then presents a discussion of the issues and sensitivities associated with the proposed community hub site.

Maps

Figure A: National designations and the village conservation area

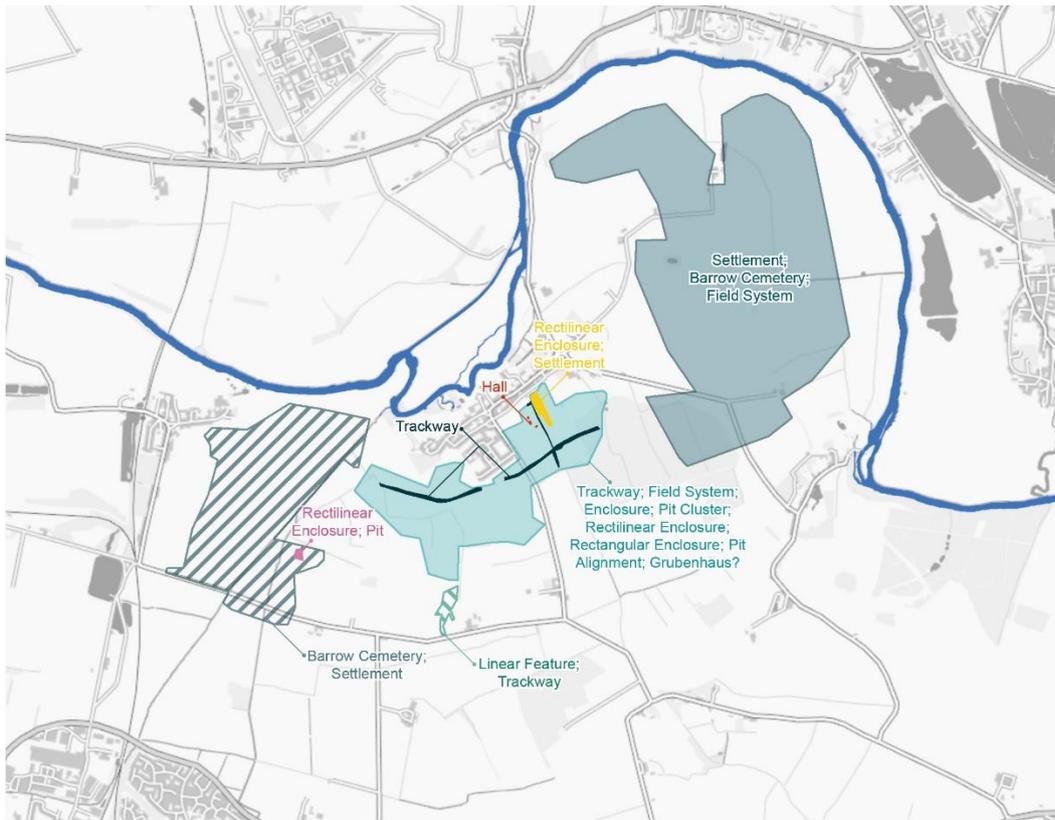


- Listed Buildings ● Grade II* ▨ Conservation Area
- Grade I ● Grade II ▨ Scheduled Monument

Service Layer Credits: Contains OS data © Crown Copyright and database right 2020. © Historic England 2021.



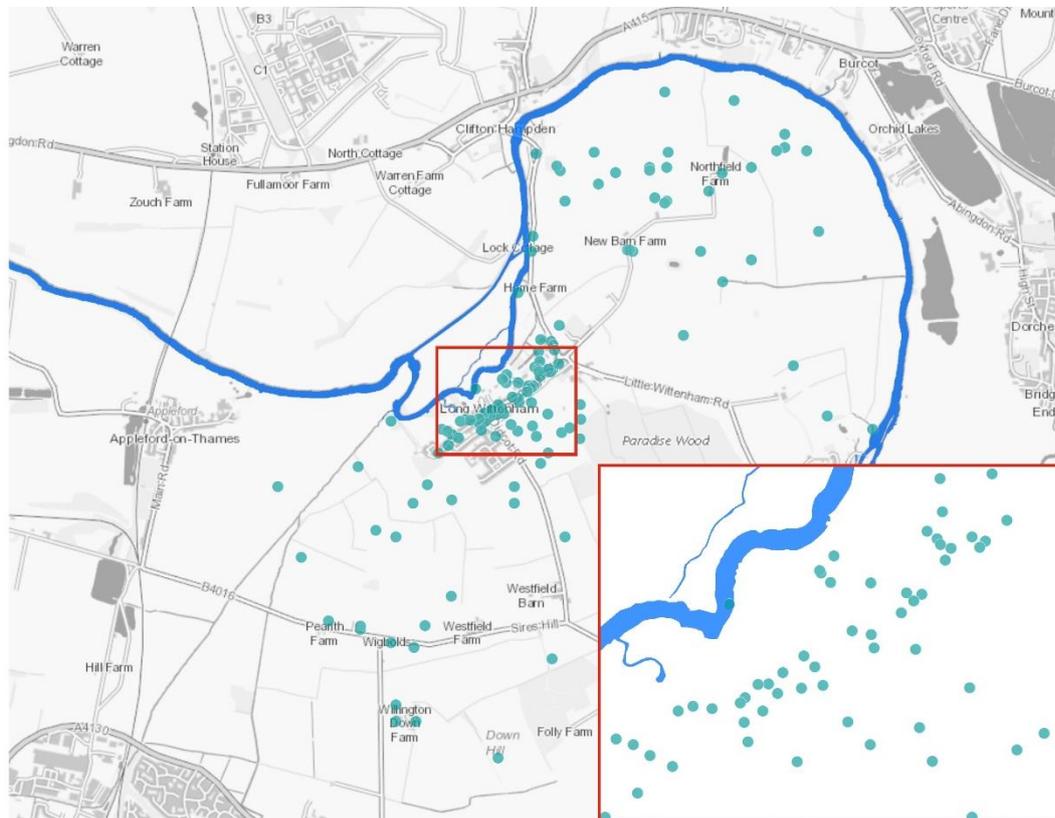
Figure B: Polygon monuments recorded in the HER



Service Layer Credits: Contains OS data © Crown Copyright and database right 2020. © Historic England 2021.



Figure B: Point monuments recorded in the HER

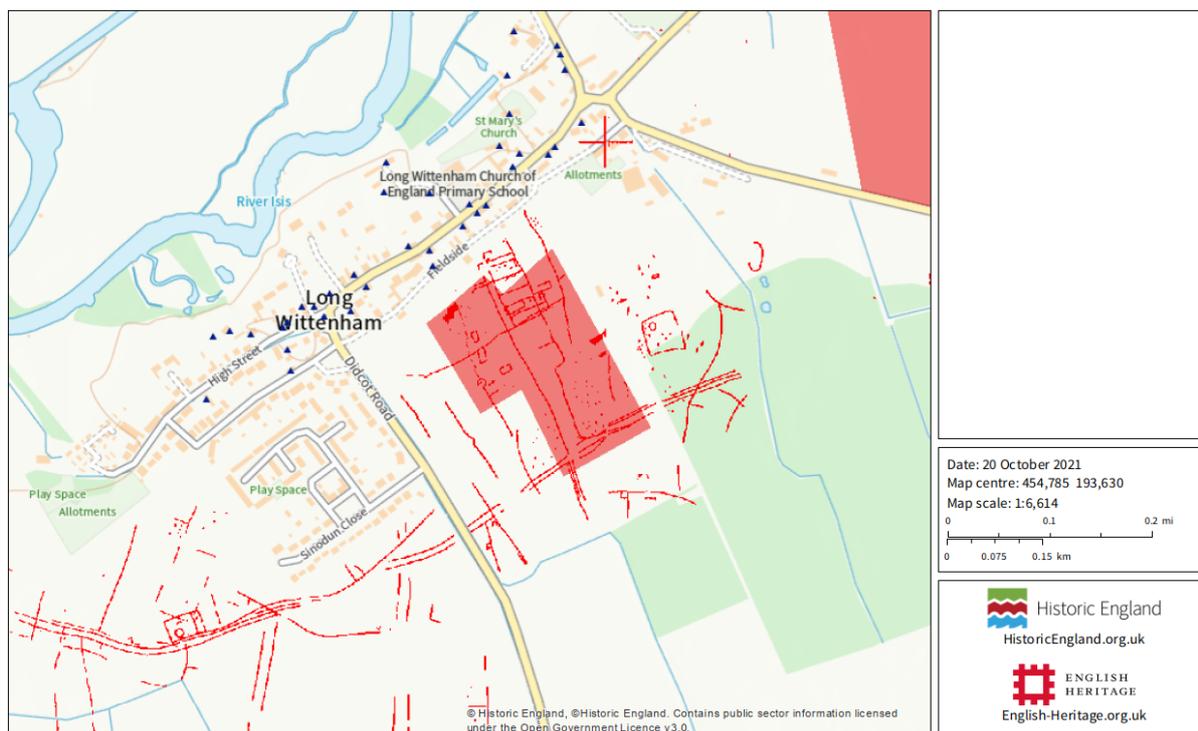


● Historic Environment Record: Monuments (points)

Service Layer Credits: Contains OS data © Crown Copyright and database right 2020. © Historic England 2021.



Figure D: Cropmarks within the scheduled monument (red polygon), west of the scheduled monument (i.e. the Didcot Road site) and west of the village



Modern Ordnance Survey mapping © Crown Copyright and database right 2021. All rights reserved. Ordnance Survey Licence number 100024900. Historic Ordnance Survey mapping © and database right Crown Copyright and Landmark Information Group Ltd (All rights reserved 2021) Licence numbers 000394 and TP0024. © Historic England. This image is indicative and for internal use. It does not necessarily represent the extent of any development proposals and/or heritage assets and may be subject to distortions with measurements scaled from this map not matching measurements between corresponding indicators on the ground. It is not to be taken as a representation of any Historic England assessment.

This figure is reproduced with the permission of Historic England

Discussion of the proposed community hub

The following text has been prepared in collaboration with Historic England.

Context of the site, including surrounding heritage assets

Approximately 100 m to the north, and separated from the site by a housing development currently under construction, is the Long Wittenham conservation area (CA). The southern boundary of the CA is marked by Fieldside, a track which is a 'byway open to all traffic' (Ordnance Survey). There are a number of Grade II listed buildings just north of Fieldside.

East of the site and immediately adjacent is the scheduled monument *Anglo-Saxon great hall complex and Roman settlement features at Long Wittenham*. HA no.1468510. This monument consists mainly of below-ground archaeological features.

West of the site on the other side of Didcot Road a large Saxon cemetery was excavated and further burials have been found immediately north of the site (on the site now under construction). Saxon structures and a well were also found, and one late prehistoric or early Roman burial.

Wittenham Clumps lies 1.8 km to the south-east. Castle Hill is a scheduled Iron Age hillfort. Round Hill, next to the hillfort, has commanding views including towards Long Wittenham.

The site lies within an archaeologically rich area of landscape, known from aerial photography and archaeological investigation. Two further scheduled monuments

consisting of below-ground archaeological remains lie north-east and west of the site. These are at some distance and have little or no intervisibility with the site therefore they are not discussed further.

Significance and impact

For all of the surrounding heritage assets it is necessary to consider whether the site as it is now contributes in any way to their significance, and if so, whether that will be altered by development.

The presence of new buildings on the site would, in relation to the Long Wittenham conservation area, be experienced from the track known as Fieldside and particularly from the public footpath running southwards across the fields from Fieldside. From both these locations the rural surroundings which contribute to the significance of the conservation area will appear reduced by the new development. This is also a cumulative effect with the development currently in progress. The magnitude of the impact will depend on the final design of the development including height, associated infrastructure (eg lighting and fencing for sports pitches, and on boundary treatment and screening. With sensitive design it should be feasible to ensure low impact from the development, ie minor impact which is at the lower end of the spectrum for less than substantial harm (NPPF, paragraph 202).

The Wittenham Clumps complex including the scheduled Castle Hill Iron Age hillfort undoubtedly gain significance from the rural surroundings which illustrate how the hillfort was built in, and dominated a rural hinterland. Views into the site are however mainly restricted by intervening tree growth and I would assess the impact as negligible.

Turning to the adjacent scheduled monument, the monument description summarises this as: *a high status Anglo-Saxon settlement comprising four post-in-trench timber hall buildings and a sample of numerous putative sunken featured buildings; a sample of enclosures and associated droveway representing the remains of a Roman ladder settlement and a portion of Roman trackway centred at SU 54953 93511.* As with the conservation area, the monument area would mainly be experienced from Fieldside and the public footpath. There is at least one slight possible earthwork within the monument but it is otherwise below ground.

Experience of the monument is therefore quite limited but it clearly lies within mainly rural surroundings, with fields and hedges. The surroundings are illustrative of the rural enclosures and fields which make up parts of the monument and therefore do make a modest contribution to its significance. This would be impacted by a development. The magnitude of the impact will depend on the final design of the development including height, associated infrastructure (eg lighting and fencing for sports pitches, and on boundary treatment and screening. With sensitive design it should be feasible to ensure low impact from the development.

Lastly, there is the evidential value of the site itself, i.e. the extent to which archaeological deposits within the site could contribute to our knowledge and understanding of the past. An important consideration is to consider this against the archaeological deposits which have been scheduled adjacent to the site, and are therefore considered to be of national significance.

An archaeological evaluation (trial trenching) has recently been carried out in the southern part of the site (Cotswold Archaeology May 2021) and the northern part

was evaluated in 2019 (Oxford Archaeology, October 2019). Both evaluations add to the previous knowledge of the site from aerial photography and geophysical survey.

The evaluation of the northern part of the site can be summarised as:

- a north-west south-east ditch in Trench 4, recut several times, interpreted as a boundary and possibly of Roman date (one sherd of pottery was found). This matches with a long anomaly from the geophysical survey.
- two further undated ditches on the same alignment found in Trenches 3, 16 and 8. These match with linear features found by aerial photography but not confirmed by geophysics.
- a large pit with 5th to 7th century Saxon pottery (Trench 7).
- a possible rectangular structure (Trenches 6 and 18) which showed as a weak anomaly on geophysics. Both trenches found narrow, shallow linear features, undated, matching the line of the anomaly. This feature was previously considered as a possible Saxon hall. While this remains possible, it would have to be very poorly preserved or with highly variable preservation. Only further excavation would clarify this. The remains of an additional Saxon hall on land adjacent to the scheduled monument protecting a group of such structures suggests this is a feature that contributes to the archaeological interest (and therefore significance) of the wider area of archaeological remains. However, the remains are in a condition that is not judged to merit their inclusion within the area of national importance. It may, nevertheless merit preservation in-situ within a wider development.

In the southern part of the site the evaluation found:

- at least two phases of parallel ditches interpreted as forming a wide trackway or driveway, and dating to the Iron Age and / or Roman periods, with probability perhaps leaning towards the latter. From aerial photographic evidence it is clear that this feature is part of much larger layout of trackways and enclosure extending eastwards and northwards to the Thames, and westwards at least as far as Appleford. It could have continued in use into the Saxon period.
- further north-west to south-east linear features coinciding with aerial photograph evidence and / or geophysical survey, but not dated by the evaluation. In the south-west corner of the site these may be part of another trackway at right angles to that discussed above.
- a large cut feature in which a few fragments of Roman brick or tile were found in the lower fill. The feature was recut and this contained Saxon pottery. The feature is interpreted as a Roman waterhole (tentatively in the description, then definitively in the discussion) but there is no hard evidence for this. Neither the dating nor the interpretation seem particularly secure.

A very low number of archaeological finds characterised both evaluations. There was little pottery, brick or tile, and small assemblages of animal bone. The potential for palaeoenvironmental evidence such as seeds and other plant remains is low, unless features were to be found of considerably greater depth than were found in the evaluations.

Overall the archaeological evidence is judged to be of lesser importance than that found within the scheduled monument to the east. For example, although one possible Saxon hall has not been entirely ruled out, it does not appear to be as well-

preserved as the examples within the scheduled area. It is also important to note that some elements such as the trackways were scheduled as samples of what existed, and these samples are not threatened by the development.

The archaeological evidence has considerable potential to contribute to our understanding of the history of the area, and to increase understanding of the scheduled area through comparison between similar features.

With the site not yet formally allocated, it would be premature to offer detailed comments on a draft development layout. Comments above about good design are relevant, and where tree screening is proposed it would be better to place this outside rather than inside the scheduled monument, creating tree screening between the monument and development may be unmerited based on any need to protect the setting of the monument – particularly where land beyond the monument may have had important connections with it, whilst they could result in unmerited loss of archaeological remains of interest. Design of any development, and its construction, should consider referencing the layout of the archaeology and include interpretation of the archaeology for visitors and inhabitants. A thoughtful programme of public engagement, which goes beyond the usual default of installing interpretation panels, could ensure that inhabitants of housing on the site understand its history, and take ownership of it. This is invaluable in creating a sense of place and belonging. It also serves to protect undeveloped areas such as the adjacent scheduled monument. Such a programme would be considered as a heritage benefit.

Policy

Paragraph 194 of the National planning Policy Framework (2021) states that: *In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.*

Following completion of the most recent evaluation sufficient work is judged to have been done for this requirement to be met. The only exception would be if the applicant makes a change in the area covered by the development.

The concept of less than substantial harm appears in paragraph 202 of the NPPF. In considering an application for planning permission for a development on this site, the local authority would be required to balance any harm to heritage assets against public benefit.

Conclusion

Historic England have agreed the following position at this stage:

- The level of harm to designated heritage assets would be less than substantial and should not rise above minor harm provided the development is sensitively designed as discussed above. Historic England can advise further as designs are developed.

- There would be harm to the undesignated archaeological deposits on the site; however, these assets are not likely to be of national significance. Were planning consent to be granted for a development (which would require sensitive design and layout), the impact on archaeological deposits could likely be mitigated through conditions on planning consent, pertaining to preservation in situ, with archaeological investigation and recording before or during development and appropriate on site interpretation to provide a balancing heritage benefit in addition to other public benefits delivered.