### **CROWMARSH PARISH NEIGHBOURHOOD PLAN**

### **Strategic Environment Assessment**

### **Scoping Report (Stage A)**

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Crowmarsh Parish Council

### 1. Identification of relevant plans, policies and programmes.

- 1.1 An Initial Screening Opinion on the determination of the need for a Strategic Environmental Assessment (SEA) was issued on 9 January 2018. The Screening Opinion accords with the Environmental Assessment of Plans and Programmes Regulations 2004 and European Directive 2001/42/EC. In this initial screening opinion, South Oxfordshire District Council determined that the Crowmarsh Parish Neighbourhood Development Plan does not require a SEA. The responses from the three consultees), however, indicated that an SEA was required:
  - Environment Agency because the Crowmarsh Parish Neighbourhood Plan Area includes large areas of Flood Zone 2/3 and has a large portion of the River Thames which forms the western boundary.
  - Historic England because the Plan could have significant effects on the historic environment in addition to the likely effect on the Chilterns AONB.
  - Natural England because there are designated sites or protected landscapes within the impacts zones of the Neighbourhood Plan area.
- 1.2 The response from Natural England specifically noted the requirement to provide a net gain in biodiversity through planning policy (Section 40 of the Natural Environment and Rural Communities Act, 2006, and section 109 of the National Planning Policy Framework). The evaluation of Flood Zones 2 and 3 has also included groundwater flooding which is prevalent in the lower elevation parts of the Parish.
- 1.3 A key condition of the Crowmarsh Parish Neighbourhood Plan is that it 'does not breach, and is otherwise compatible with, EU obligations'. One of these obligations is Directive 2001/42/EC 'on the assessment of the effects of certain plans and programmes on the environment'. This is often referred to as the Strategic Environmental Assessment (SEA) Directive. The SEA Directive 'seeks to provide a high level of protection of the environment by integrating environmental considerations into the process of preparing plans and programmes'. The Crowmarsh Parish Neighbourhood Plan needs to be compatible with the SEA Directive which is transposed into UK law through the Environmental Assessment of Plans and Programmes Regulations (the 'SEA Regulations').
- 1.4 The Environmental Assessment of Plans and Programmes Regulations require the likely effects on the environment of implementing a development proposal to be identified, described and evaluated (Appendix 1). The information to be given includes:
  - 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.
- 1.5 The National Planning Policy Framework (NPPF) published by the government in 2012 and revised in 2019, is an important guide in the preparation of local plans and neighbourhood plans. The Crowmarsh Parish Neighbourhood Plan will demonstrate that it is

consistent with the provisions of the NPPF. The following paragraphs of the NPPF (2019) are especially relevant to the Neighbourhood Plan:

Neighbourhood Planning (paragraphs 28 and 30)

Supporting a prosperous rural community (paragraph 83)

Protecting healthy communities (paragraph 91)

Protecting local green spaces (paragraph 96 and 97)

Good Design (paragraph 126)

Conserving and enhancing the natural environment (paragraph 170)

Conserving and enhancing the historic environment (paragraph 184)

- 1.6 The development plan for the Parish currently comprises the South Oxfordshire Core Strategy of December 2012 (covering a plan period to 2027) and a number of saved policies of the South Oxfordshire Local Plan 2011 adopted in January 2006 (covering the plan period to 2011). The emerging South Oxfordshire Local Plan 2035, will replace the Core Strategy and older saved policies. The Neighbourhood Plan will be tested for its general conformity with the strategic policies of the emerging Local Plan.
- 1.7 The Core Strategy and saved policy both seek to prevent the unnecessary loss of valued community facilities. This provides an opportunity for the Plan to identify those community facilities in the Parish that warrant protection. There is a comprehensive framework of landscape protection policies that are relevant to the Parish, given the presence of the AONB and River Thames in parts of the Parish. The framework allows for appropriate development but reinforces the importance of ensuring all development proposals respect the valued landscape character.
- 1.8 The Parish contains a significant number of listed buildings, a Scheduled Ancient Monument and a Conservation Area, although details regarding the latter is not currently available. Along with the local landscape character, these heritage assets help shape the site selection and other policies of the Plan.
- 1.9 The SEA allows the environmental, social and economic effects of the Crowmarsh Parish Neighbourhood Plan to be tested to ensure that no significant adverse effects will impact the environment and that the Plan will promote sustainable development (Appendix 2).
- 1.10 The combined process involves a simple evaluation of the environmental, social and economic impacts of the Neighbourhood Plan as follows:
  - An outline of the contents, main objectives of the plan, and relationship with other relevant plans or programmes.
  - The relevant aspects of the current state of the environment, highlighting any aspects currently under threat.
  - The environmental, social and economic characteristics of areas likely to be significantly affected by 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.

- The environmental protection objectives, established at international, community or national levels, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation.
- The likely significant effects on the local environment, economy and society.
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the Plan.
- An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information.
- A description of measures envisaged concerning monitoring.

1.11 The methodology for the assessment is intended to be proportionate to the task of assessing the development proposals of a Neighbourhood Plan in a rural Parish. A summary of the process, as derived from the 2004 guidance is contained in Table 1. This report covers headings 1 to 6 in Stage A.

TABLE 1 The combined SEA and SA process

Scoping	<b>STAGE A:</b> This stage sets the context of the assessment by identifying the
	baseline data and establishing the scope of the assessment.
	1. Identification of relevant plans, policies and programmes. Any existing
	requirements that need to be taken into account or incorporated into the plan are identified.
	2. Review of baseline information. Data about environmental, social and
	economic issues is collected, together with an indication as to how this
	may change in the future without the plan or programme under preparation.
	3. Identification of Sustainability Issues. The review of plans and policies,
	together with the baseline information are used to identify the key
	sustainability issues which could impact the plan.
	4. Development of the SEA/SA Framework. The assessment criteria used
	to assess the impact of the plan or programme.
	5. Identification of initial plan options. Taking into account best practice
	initial identification of options and reasonable alternatives undertaken.
	<b>6. Consultation.</b> On the scope and alternatives for assessment it is
	necessary to consult statutory consultees, that is Natural England, Historic
	England and the Environment Agency.
Assessment	<b>STAGE B:</b> This stage involves the assessment of the any likely significant
	effects of the plan policies (and any reasonable alternatives) on the key
	sustainability issues identified.
	1. Finalisation of the Plan options and alternatives for testing.
	2. Testing the Plan Objectives against the SEA/SA Framework. The Plan
	Objectives are tested to ensure compliance sustainability principles.
	<b>3. Evaluation of plan options and alternatives.</b> The SEA/SA Framework is
	used to assess various plan options by identifying the potential
	sustainability effects of the plan and assist in the refinement of the
	policies.
	4. Predicting and evaluating the effects of the plan. To predict the
	significant effects of the plan and assist in the refinement of the policies.
	5. Consideration of ways to mitigate adverse effects and maximise

	<b>beneficial effects.</b> To ensure that all potential mitigation measures and measures for maximising beneficial effects are identified.						
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	6. Proposing measures to monitor the significant effects of implementing						
	the Plan. To detail the means by which the sustainability performance of						
	the plan can be assessed and monitored.						
	This assessment is used to feed into the development of a plan or						
	programme to help ensure the most sustainable option is selected. The						
	SEA/SA framework is also used to access the sustainability implications of						
	the draft policies and the results used to inform policy development.						
Reporting	STAGE C: Preparation of the SEA/SA Report						
	The findings of the assessment together with how it has						
	influenced the development of the plan are identified and set out						
	·						
	in a draft environmental report together with the						
	recommendations on how to prevent, reduce, or offset any						
	significant negative impacts arising from the plan.						
	<b>STAGE D:</b> Consultation – seek representations from consultation bodies						
	and the general public						
	This is an ongoing process. Consultation of the draft SEA/SA						
	Report is undertaken and used to influence further iterations of						
	the sustainability appraisal process.						
Adoption and	STAGE E: Monitoring						
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monitoring	Following adoption of the Plan, the significant effects of implementing the						
	plan are measured and any adverse effects are responded to. The results						
	are fed into the future plans and sustainability appraisals.						

### 2 Review of baseline data

2.1 Much of the Parish lies beneath the scarp slope of the Chiltern Hills in the River Thames Corridor (riverside flood plain); a large part of the Parish lies within the Chilterns Area of Outstanding Natural Beauty of which much lies within the Central Vale Fringes as defined in the *South Oxfordshire Landscape Assessment* report. During prolonged wet weather groundwater draining through the chalk beneath the hills backs up in the River Thames flood plain as the river level rises. This makes certain areas of Crowmarsh and Mongewell liable to groundwater flooding, with a shallow water table beneath some residential areas.

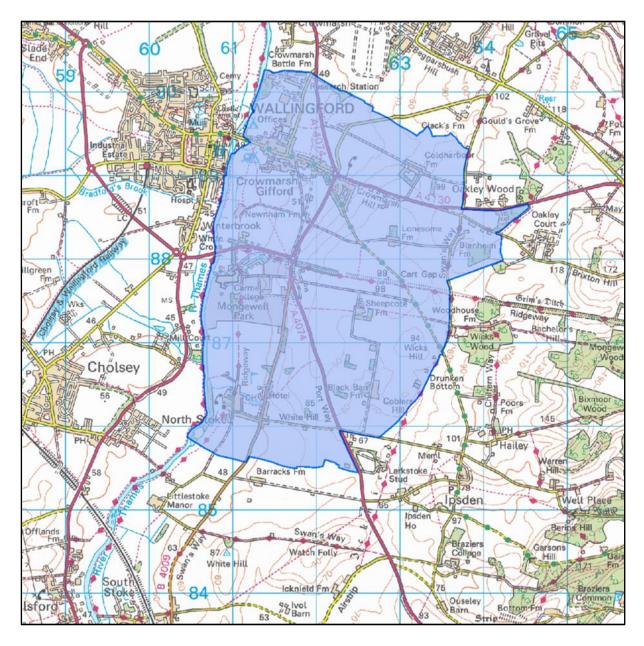


Figure 1 Crowmarsh Parish [Ordnance Survey Rights 2018: CPC Licence Number 100050856]

- 2.2 Crowmarsh Parish borders Benson Parish to the north, Nuffield to the east, Ipsden to the south east, South Stoke to the south; across the River Thames is Cholsey Parish to the south west and Wallingford Town to the west. Wallingford Town traverses the river at Wallingford Bridge into what would otherwise be Crowmarsh Parish with a small bridgehead and the adjacent Riverside Park area which was gifted to Wallingford Town Council.
- 2.3 Crowmarsh is a large Parish in area with Crowmarsh Gifford designated as one of the 'Larger Villages' within the curtilage of South Oxfordshire District Council. Crowmarsh Parish includes part of the Chilterns Area of Outstanding Natural Beauty and the River Thames Corridor and the Central Vale Fringes. Crowmarsh Gifford enjoys access to the market town of Wallingford via the ancient river bridge, but is proudly independent of that town. A landscape character assessment of some of the sites adjacent to Crowmarsh Gifford was carried out in 2015 and provides valuable supporting evidence to the Plan (see

http://www.southoxon.gov.uk/services-and-advice/planning-and-building/planningpolicy/evidence-studies ). A landscape character assessment was carried out in 2017 http://www.southoxon.gov.uk/ccm/support/dynamic serve.jsp?ID=788092192&CODE=465 0A3652852911819269B1BB795E501.

- 2.4 North Stoke is a smaller rural village, much of it within a Conservation Area, also adjacent to the river. Mongewell is a hamlet centred on Mongewell Spring which includes the buildings of the former Carmel College Jewish Independent School; one building of which is now owned and occupied by Centre for Agriculture and Biosciences International (CABI), the remainder are unoccupied. The Parish lies midway between Reading and Oxford.
- 2.5 Crowmarsh Gifford developed from the cross roads of the north-south Oxford to Reading road and the east-west Henley to Wallingford road which continues west towards Didcot. The cross-roads was off-set, and until the by-pass for the A4074 was constructed through the east of the village, was a cause of much congestion despite traffic light control. Only two of several pubs survive in the village, both near the cross roads, The Bell and the Queen's Head. The Street is the main east-west highway today, carrying traffic from Wallingford Bridge through the cross roads with Benson Lane and Old Reading Road and uphill towards a busy roundabout crossing the A4074, the Oxford to Reading road, which also separates the Crowmarsh Hill settlement from the rest of the village.
- 2.6 Crowmarsh Gifford village currently consists of 542 dwellings, mainly comprising detached and semi-detached houses and maisonettes and some flats; North Stoke has 100 dwellings and Mongewell has just 47. There are 48 listed buildings in the Parish, two of which are Grade I and three Grade II. The key population statistics for Crowmarsh Gifford (2011 census) were:

All residents	1207
Number of households	483
Average household size	2.53
Residents in households	1199
Residents in communal living	8
Average age	39.8 years

2.7 The distribution of dwelling types according to the number of bedrooms was:

1 bedroom	15
2 bedrooms	115
3 bedrooms	210
4 bedrooms	110
5 or more bedrooms	33

2.8 The Parish hosts a large scientific campus at Howbery Park which is the home of HR Wallingford and which now hosts a large contingent of staff from the Environment Agency as well as other smaller, mainly scientific units. Next door, also in Benson Lane, is the Centre for Ecology & Hydrology with staff from the British Geological Survey and the Meteorological Office embedded within it. On the new By Pass to the south of Crowmarsh, Nosworthy Way, is CABI. Collectively these scientific institutions employ in excess of 800 technical and support staff. However, few of these people live in the Parish with most staff commuting in from surrounding towns, principally, Didcot, Reading and Oxford.

- 2.9 Crowmarsh Gifford has two builders' merchants, both located in The Street, and an agricultural merchant situated in the middle of Lower Betts Field on the west side of the A4074. Crowmarsh Gifford also has a village shop. It is otherwise dependent on retail facilities in Wallingford, Benson and Cholsey though many residents prefer to use larger supermarkets in Didcot and elsewhere or order their weekly shop via the internet. Thus, although Crowmarsh Gifford is designated a larger village, it is also seen in planning terms as part of Greater Wallingford.
- 2.10 Until January 2015 Crowmarsh Gifford was also home to the South Oxfordshire and Vale District councils at which time they was forced to move out of their premises in Benson Lane due to an arson attack. The derelict and abandoned building is scheduled for demolition and new facilities are planned on the site ready for the return of the two councils sometime in the early 2020s.
- 2.11 Crowmarsh has a primary school and two pre-schools. The school currently enjoys an OFSTED 'Good' status, and as such makes the Crowmarsh Gifford School catchment a desirable place to live for families with young children. Most of the primary school children progress to secondary school in Wallingford. The primary school is situated on a confined site with no room for further expansion. Parking is a problem during the morning and afternoon arrival and departure of children accompanied by parents.
- 2.12 The village of Crowmarsh Gifford has a recreation ground with a large pavilion and a village hall. These are under the ownership and management of Crowmarsh Parish Council or trusts and committees. The village hall is a popular venue for a variety of social activities ranging from Beavers to U3A, exercise activities as well as children's parties, occasional wedding receptions and an annual music festival. The recreation ground offers a childrens' play area, tennis courts, and a basketball square and is home to Crowmarsh Youth Football Club which hosts an annual summer Six-a-Side Tournament weekend, and to the village cricket team. The pavilion not only offers changing facilities but has a large meeting room which is popular with a variety of social groups such as the Photography Club as well as exercise clubs. Adjacent to the recreation ground is a nature area with good footpath access. North Stoke has a village hall and a recreation area. Other leisure facilities at North Stoke include The Springs Golf Club which currently has a membership of over 400.
- 2.13 Tourism focuses on visitors to both Wallingford and the Chiltern Hills. Some tourists arrive by boat via the river, the majority by road. Crowmarsh Gifford offers two non-residential caravan and camping sites, both close to Wallingford Bridge and a third at Newnham Manor, the latter is the subject of a planning application for housing. There is currently one bed and breakfast address in Crowmarsh Parish but no hotels.
- 2.14 The closest mainline railway station is Cholsey, 5 km away. However, Didcot, Goring, Henley, Reading and Oxford can all be reached by bus transfer via Wallingford; there is a half

hourly bus service through Crowmarsh to Reading, hourly to Henley, and every 20 minutes to Oxford during weekdays, hourly on Sundays.

- 2.15 The river flood plain comprises gravel deposits bound in sands, silts and clays with local clay lacustrine lenses. It is an important area not only for habitat but it is used by the Environment Agency as a preferred area of flooding during periods of high river stage. The Parish contains riverside meadows that sustain important grassland for cattle. To the east the higher ground offers areas of Grade II Agricultural land which supports arable cultivation. A small part of the Parish is given over to woodland providing a diverse environment and a range of habitats.
- 2.16 Much of Crowmarsh Parish lies beneath the scarp slope of the Chiltern Hills in the Thames river flood plain. During prolonged wet weather groundwater draining through the chalk beneath the hills backs up in the flood plain as the river level rises. This makes certain areas of Crowmarsh and Mongewell liable to flood, with a very shallow water table beneath some residential areas. The school at Crowmarsh is on a particularly wet site, exacerbated by a nearby storm drain in Old Reading Road which occasionally overflows towards the school grounds. There is an ephemeral spring in The Street at the top end of Crowmarsh village adjacent to house number 119. This flows down a ditch and then onto the pavement and down the road gulley. Although an inconvenience it does not put housing at risk but serves as an illustration of the seasonal shallow water table.
- 2.17 The river flood plain comprises gravel deposits bound in sands, silts and clays with local clay lacustrine lenses. It is an important area not only from a habitat perspective but it is used by the Environment Agency as a preferred area of flooding during periods of high river stage. Up to a certain level the river can be controlled by closing the weir at Goring allowing the river to rise overbank up to Benson Lock. This provides a safeguard for housing within the flood plain in lower reaches of the river, notably at Purley-on-Thames. No housing or other infrastructure is at risk in the Goring to Benson stretch of the river, including those parts of the flood plain within Crowmarsh Parish. It is essential, therefore, that this area is maintained as meadow for this purpose.
- 2.18 The Parish contains riverside meadows that sustain important grassland for cattle. To the east the higher ground offers areas of Grade II Agricultural land which supports arable cultivation producing crops for human consumption rather than animal food stock. These activities need to be nurtured and encouraged. Proposed changes in use for non-farming purposes need to be assessed carefully in terms of benefits and disbenefits especially if lower grade land is available for building development. A small part of the Parish is given over to woodland providing a diverse environment and a range of habitats.
- 2.19 Local fauna include hedgerows of blackthorn and hawthorn, a range of indigenous trees, including black poplar; few elm trees survived the recent Dutch Elm Disease outbreak. A particular feature in the area is the occurrence of large balls of mistletoe slung high up on selected species. The riverside area is home to the roe deer, whereas the larger deer are a common sight within the Chilterns. Foxes and badgers are distributed across the Parish area, foxes now particularly keen on the waste bins at the Riverside Park area at Crowmarsh Gifford during the early hours of the morning. Bats are commonplace and there is a wide

variety of bird life including the now common red kite, while the much rarer kingfisher and heron work the river. There are many other species common to the area.

2.20 A number of protected species are at home in the Parish. The field to the east of Benson Lane in Crowmarsh village is home to barn owls which can be seen in flight adjacent to the wooded Marsh Lane footpath, while the edges of the same fields are home to numerous adders, increasing in distribution towards the stream flowing across the northernmost apex of this land. Other protected species such as the stag beetle are also common on the arable land and adjacent areas.

2.21 The Chilterns Area of Outstanding Natural Beauty secures the protection of a large area of Chalk Downland, most of which lies outside the Parish. The majority of the Parish lies within the AONB and those parts of the Parish not in the AONB are likely to be in the setting of the AONB. The Chilterns Hills and the North Wessex Downs are part of a broad belt of chalk upland running across England in an arc from Dorset to Yorkshire. The Goring Gap, where the River Thames carves through the chalk escarpment, forms the boundary between the two AONBs in South Oxfordshire. Although both areas are chalk upland, their character differs: the Chilterns AONB is a generally more enclosed and wooded landscape that the broader more open uplands of the North Wessex Downs. The Chilterns escarpment in South Oxfordshire is particularly impressive, and the beech woods are justifiably famous.

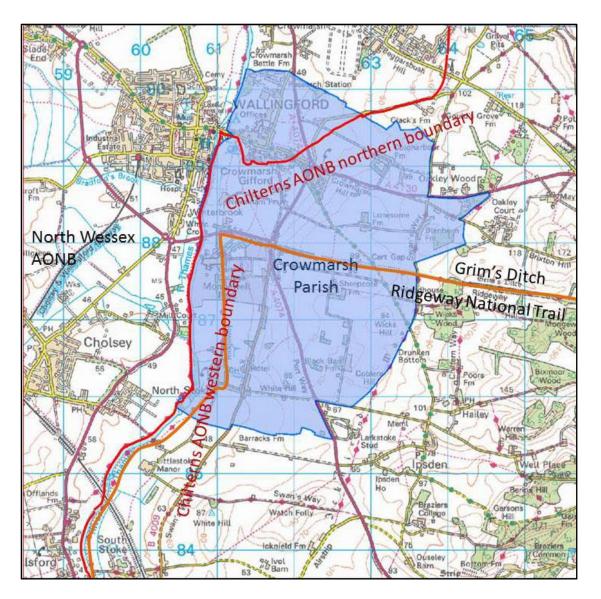


Figure 2 Chilterns AONB, Ridgeway National trail and Grim's Ditch [Ordnance Survey Rights 2018: CPC Licence Number 100050856]

2.22 Crowmarsh Gifford and Mongewell lie in full view of the Downs and great care is needed to ensure that any development in these areas of the Parish is sympathetic to the guidelines controlling this defined Area of Outstanding Natural Beauty. However, land within the controlled area that can be designated as degraded, i.e. part brownfield, or in need of redevelopment can be considered for development if this would increase its visual and amenity appearance (*Chilterns AONB Management Plan 2014-2019*, Policy D5).

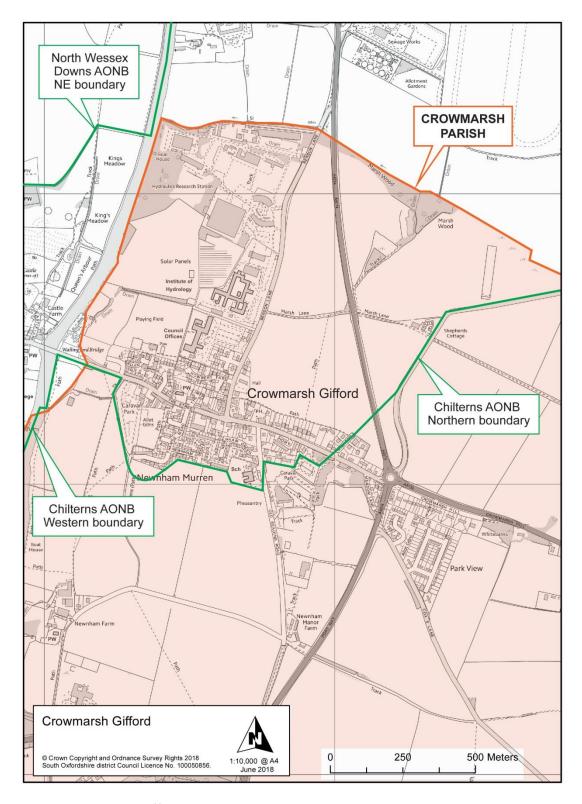


Figure 3 Crowmarsh Gifford and the AONB

2.23 Crowmarsh has a long and exciting history, although as its name suggests, was once a marsh offering an ideal habitat for crows. After the Norman Conquest of England most of the land was granted to Walter Giffard, later Earl of Buckingham (hence Crowmarsh Gifford).

In due course it came into the possession of William Marshal, 1st Earl of Pembroke and remained with his heirs until later passing back to the Crown. Nearby Newnham Manor was originally granted by William the Conqueror to Miles Crispin, but by 1428 was owned by Thomas Chaucer. After his death it was passed to his daughter Alice, wife of William de la Pole, 4th Earl of Suffolk.

- 2.24 In 1139 King Stephen built a wooden fort in Crowmarsh. This was the first of a series of forts built to oppose Wallingford Castle, which supported his cousin Matilda during the civil war known as The Anarchy. The forts were probably dismantled as a result of the Treaty of Wallingford of 1153. The fort at Crowmarsh Gifford included a 20 m wide ditch surrounding an enclosure measuring 50 by 35 m.
- 2.25 The Church of England parish church of Saint Mary Magdalene was built in about 1120. The north door, south door, three windows in the south wall, chancel arch and font are all Norman. A north transept with a pointed arch was added in about 1200. The building was restored in 1836 and 1868. Musket holes in the back (east door) are said to result from Cromwell ousting members of the Wallingford garrison from sanctuary in the church during the siege of Wallingford Castle. There are also two redundant churches of note in the Parish, although that at Newnham Murren is still consecrated.
- 2.26 In 1701 agriculturist Jethro Tull invented his revolutionary seed drill at Howbery Farm. In 1770 Mongewell Park was acquired by Shute Barrington, then Bishop of Llandaff. He was buried in Mongewell Church. The Jacobean country house Howbery Court (Howbery Park) was built in about 1850 for local MP William Seymour Blackstone.
- 2.27 North Stoke is a small village of approximately 100 homes, the majority of which are situated between the B4009 and the River Thames. There is a small amount of ribbon development along the B4009. It is not on mains drainage and all dwellings have cesspits. It has a small village hall, a playing field, golf course and a church, but no other community facilities. The former Springs Hotel which closed in the last ten years, is being considered for redevelopment as a hotel and leisure facility.
- 2.28 Mongewell is a hamlet with no facilities. The former Jewish public school of Carmel College, which closed in the early 1990s occupies the majority of the hamlet. The ancient Grim's Ditch and the Ridgeway National Trail traverse the hamlet. There are a number of listed buildings in the college grounds. The majority of the 47 homes are the former staff accommodation for the college, these are situated along the Ridgeway and the college grounds. In 2016 South Oxfordshire District Council approved an application for 166 residential units to redevelop the former college. Work on this site has yet to start.
- 2.29 The Plan objective is to conserve the rural nature of the Parish while allowing necessary development of housing and employment opportunities. In the absence of such a Plan development could proceed piecemeal without any vision of a coherent and sustainable outcome. Pressures from adjacent parishes and from Wallingford Town could impact the sustainability of the Parish. External changes could, therefore, be significant and could have a negative impact on the parish. The Plan is designed to mitigate known change during the Plan period and to ensure that the Parish is as robust it can be to face the next 15 years.

### 3. Identification of sustainability issues.

- 3.1 The countryside within the Parish is managed as arable land and pasture for grazing. Most of it lies within the Chilterns Area of Outstanding Natural Beauty and agricultural land classification is 2 (very good) and 3 (good to moderate). It is home to a variety of protected species including, for example, adders, barn owls and stag beetles in the field east of Benson Lane in Crowmarsh Gifford. Low-lying land is liable to flooding by the river, exacerbated by spring discharges from the base of the permeable chalk where it overlies marly chalk. The Parish is rich in artefacts that reflect its important heritage. Grim's Ditch, which forms part of the Ridgeway National Trail, is a scheduled ancient monument. The Ridgeway National Trail and Grim's Ditch are nationally important recreation opportunities and historic environment assets. Guidelines and policy statements from the various guardians of the countryside protect the land primarily for agricultural use and recreation.
- 3.2 There are a number of social and environmental sustainability issues that impact the plan directly. Crowmarsh Parish and its three separate communities are currently sustainable. However, some of the available support for these communities is at or near capacity and are consequently of concern:
  - 3.2.1 <u>Education</u>: Crowmarsh Gifford Church of England Primary School was ranked in the top 200 primary schools in England and Wales by the *Sunday Times*. The school is one of the key attractions for residents with young families to want to come and live in Crowmarsh.

The school currently has a maximum of 210 places, with a single year age intake. This equates to 30 pupils per class. The majority of the school buildings were originally built in the early 1970s and designed for just 90 pupils. In the ensuing years there has been a certain amount of internal reorganisation, with the addition of two extensions to provide the current seven classrooms. In the early part of this century Crowmarsh Gifford Pre-School moved on to the site.

The administration office, hall, staffroom and storage capacity have basically remained as the original design. The current number of staff is twenty-eight, up from the original ten.

Two of the main problems with the current layout of the school buildings are that the school hall is far too small and has to be used as a corridor for access between Key Stage One and Key Stage Two so that activities in the hall are subject to repeated interruption. Since the introduction of free school meals for all Key Stage One pupils the school kitchen is of an inadequate size and school lunch has to be taken in two sittings. The school roll stands at 206 (April 2017).

The Governing Body is adamant that it will not dilute its educational status by introducing mixed aged classes. Mixed classes would have a detrimental effect on the quality of education received by those mixed year pupils. The Governing Body, however, would consider expanding to a double year intake (420 pupils), with two

classes of 30 pupils per year. However, it recognises that this could not be achieved on the present site.

- 3.2.2 <u>Medical</u>: The Wallingford Medical Centre cannot cope with the present demand from the Wallingford catchment area. It has the highest patient to doctor ratio of any medical centre in England. Appointments are difficult to obtain and patients are asked to use other facilities such as A&E as much as possible. It will be subject to massive pressure from proposed new building. Dentistry is available in Wallingford. The practice at Benson is being enlarged but only to cope with new housing proposed at Benson.
- 3.2.3 <u>Traffic and Wallingford Bridge</u>: The ancient bridge between Crowmarsh Gifford on the one side of the River Thames and the town of Wallingford on the other is barely capable of sustaining present traffic levels. It is limited to one way traffic controlled by traffic lights. With extensive new building development in Wallingford and existing proposals for new housing in Crowmarsh the bridge will likely become impassable for much of the day. Traffic build-up occurs during the morning and evening rush and at other peak times when traffic is heavy. A serious issue is air pollution, caused by standing traffic at the traffic lights in Wallingford, where monitoring indicates pollution levels to be above the acceptable limits. This is one of three designated Air Quality Management Areas in the District. A knock-on effect of traffic congestion is the disruption of bus schedules.
- 3.2.4 <u>Access to retail facilities</u>: Crowmarsh Gifford has just one small shop. However, retail facilities are limited in Wallingford, with its numerous pizza parlours, coffee shops and charity shops but only one supermarket. Many Crowmarsh residents with access to cars prefer to shop in Didcot or further afield, however, those without transport are obliged to depend on Wallingford while others use web-based delivery services. New housing in Wallingford and in Crowmarsh Gifford will need new and affordable retail facilities.
- 3.2.5 <u>Jobs and housing</u>: There are few new job opportunities in Crowmarsh Gifford and Wallingford. Opportunities for school leavers are essentially poorly paid, mainly within the retail and catering trades. There are few moderately priced one and two bedroom starter homes available in the Parish suitable for the younger members of the community.
- 3.2.6 <u>Utilities</u>: The utility provision in Crowmarsh Gifford is ancient, outdated and of inadequate capacity. The sewerage system is under constant repair; the electricity supply fails in high winds.
- 3.3 Statutory Consultees to the first draft of the Scoping Report highlight the following concerns:
  - 3.3.1 <u>Heritage</u>: The potential effects of new development on the heritage assets of the Parish and the condition of those assets are potential sustainability issues. For

example, the Historic England Heritage at risk register has the North Stoke Henge and Ring Ditch site scheduled monument as being at risk.

- 3.3.2 <u>Flooding</u>: The Parish lies alongside the River Thames and part of the Parish includes the Thames Corridor and its associated flood plain. The sustainability of structures within Flood Zones 2 and 3 are increasingly at risk due to Climate Change.
- 3.3.3 <u>Landscape</u>: Much of the Parish is a protected landscape and as such should not be put at risk of inappropriate development. Development most also respect the setting of the AONB and the ensure the visibility of any developments is limited from viewpoints.
- 3.4 Given these nine concerns, the communities within Crowmarsh Parish have been very conscious that any new proposals for significant numbers of new housing could tip the balance of sustainability in a number of different ways. Parishioners have, therefore, assiduously defended land east of Benson Lane and north of The Street against repeated developer applications due to the potential scale of development, i.e. more than doubling the size of the village. A smaller plot of land behind Newnham Manor was favoured by the majority of the community to allow some development but at a scale that can be better assimilated by the neighbourhood and its infrastructure. However, during the preparation of the Plan, planning permission has been granted for 150 houses on land east of Benson Lane and there is a resolution to grant planning permission for a further 100 houses at Newnham Manor.
- 3.5 The Core Strategy and saved policy both seek to prevent the unnecessary loss of valued community facilities. This provides an opportunity for the Plan to identify those community facilities in the Parish that warrant protection. There is a comprehensive framework of landscape protection policies that are relevant to the Parish, given the presence of the AONB and River Thames in parts of the Parish. The framework allows for appropriate development but reinforces the importance of ensuring all development proposals respect the valued landscape character.
- 3.6 The Parish contains a significant number of listed buildings, a Scheduled Ancient Monument and a Conservation Area. Along with the local landscape character, these heritage assets help shape the site selection and other policies of the Plan.

### 4. Development of the SEA/SA Framework.

- 4.1 The sustainability of adding no new houses to both Crowmarsh Gifford and the overall Parish, 250 new houses and 500 new houses needs to be examined to determine an optimum scale of sustainable development.
- 4.2 The spatial strategy preferred by the local community for growing the main village, and the preferred and least preferred sites for housing allocation and employment use allocation identified in the Site Assessment exercise for Crowmarsh Gifford, will be tested against alternative strategies using the SEA/SA framework where they have not already been

overtaken by Planning Permits. The scoring strategy will be fully explained to justify preferred and least preferred sites for housing and employment use land allocation around the village of Crowmarsh Gifford and reasonable alternatives will be considered. The same will be applied to employment use land allocations

- 4.3 The assessment criteria used to evaluate the environmental impact of the Plan can be applied to develop the SEA/SA Framework. This in turn will lead to the identification of initial plan options taking into account best practice, and testing reasonable alternatives to derive an optimum sustainability score coupled with least impact on the environment.
- 4.4 To assess the sustainability performance of the Plan, the outline framework that will be adopted will best satisfy the concerns of both the public and the statutory consultees, informed also by the evidence base reports (Appendices 1 to 5 of the Plan). Not all the public concerns listed in paragraphs 3.2.1 to 3.2.6 are carried forward to the Plan, the social issues are largely covered in the Emerging Local Plan, and social infrastructure will grow in line with development, albeit with delayed timing of the development of new facilities. These are not considered further in this assessment. Of the six social concerns, however, the issue of traffic management is relevant to the Environmental Assessment and is carried forward, whereas the air pollution on the Wallingford side of the Thames is not as this is also covered in the Emerging Local Plan. Finally, the community concern regarding jobs and houses is carried forward.
- 4.5 The issues raised by the three Statutory Consultees and from their comments on the initial draft Scoping Report regarding heritage, flooding and landscape are all carried forward supported by the comments received from the Chilterns Conservation Board (Appendix 3). These issues have been brought together into the Assessment Framework (Table 2) along with a description of the sustainability objective for each one.

Table 2 Assessment framework

Key Message from all consultees and evidence base	Sustainability Objective
Increase housing supply, especially affordable housing and promote development of new job opportunities	To provide existing and future intending residents with an opportunity to live in a home suited to their needs, by delivering at least 110 new homes within the plan period. To promote development of land within existing employment use zones for additional employment use
Improve the mix of housing size and tenure	To ensure suitable homes are available to all sectors of the community especially first time buyers and the elderly
Preservation and enhancement of the rural landscape and sense of place	To conserve and enhance the rural nature of the parish and particularly areas within the

	AONB which is a nationally protected landscape, as a vital lung for the whole Parish and its neighbours. To protect and maintain the network of rights of way. To protect and maintain important views, including those from the main settlements. To conserve and enhance the special interest, character and appearance of the Conservation Area at North Stoke.
Flood risk hazard	To ensure flood risk from all sources, including groundwater flooding, is managed effectively and sustainably by avoiding structural development in either Flood Zone 2 or Flood Zone 3 and near spring sites and ephemeral spring sites
Threats to biodiversity and opportunities to enhance it	To conserve and enhance biodiversity
Heritage assets and the historic environment are irreplaceable resources	To conserve and enhance the Parish's heritage for its historic significance, character and appearance and important contribution to local distinctiveness and sense of place
Improved traffic management within and through the Parish	To benefit the wellbeing of the community by the management of traffic congestion encouraging walking and cycling
Enhance the setting of new housing and conservation of rural setting	To retain existing trees and hedgerows and design new landscaping to conserve and enhance the established character

- 4.4 This framework has been adapted from parts relevant to Crowmarsh Parish of frameworks used at other village communities faced with similar issues of sustainability. It reflects the all consultees requests for specific foci. It is intended to inform each policy message and assess the sustainability objective for each one.
- 4.5 The Framework enables a number of comparisons to be made to identify positive and negative impacts. The example below is that of the impact of the basic Objectives of the Crowmarsh Parish Neighbourhood Plan on the Sustainability Objectives identified in the Assessment Framework. The assessment reviews each component and provides a score between one and three: score 1 low impact green, score 2, medium impact yellow, score 3 high impact red. The assessment is recognisably subjective. At a broad scale it does identify

the Plan Objectives that have little if any impact on the Sustainability Objectives and the Plan Objectives which might have a moderate impact on the Sustainability Objectives. Mitigation might be appropriate in the case of moderate impact on the Sustainability Objectives although none are likely to require such action. The impacts are all neutral (yellow) or positive (green), only housing and infrastructure development are identified as having a potential negative impact (red) on the two sustainability objectives of traffic management and conservation of the rural setting which thus may require mitigation.

Table 3 Comparison of Neighbourhood Plan and Sustainability Objectives

		Sustainability Objectives							
	Neighbourhood Plan Objectives	Development	Housing mix	landscape	Flooding	Biodiversity	Heritage	Traffic	Conserve
1	Rural character								
2	Landscape setting								
3	Heritage								
4	Facilities								
5	Homes								

### 5. Consultation

This document was issued to the Statutory Consultees on 21 June 2018. Key to their responses were the comments:

"will the policy/proposal protect and enhance priority habitats and the habitats of protected species (NPPF para. 174); achieve a net gain in biodiversity (NPPF paras. 170, 174, 175); support enhancements to multifunctional green infrastructure networks /corridors (NPPF paras. 170, 171); support access to green open spaces and nature?"

"is the development site within a protected landscape or its setting; is the site sufficiently screened; does the site impact on important views into and out from the AONB or its setting?" (NPPF para 172)

"assess the number and percentage of different heritage assets at risk; the percentage of planning applications where archaeological investigations were required prior to approval; and, the percentage of planning applications where archaeological mitigation strategies were developed and implemented."

The Chilterns Conservation Board was also invited to comment on the scoping report as much of the parish lies within the Chilterns Area of Outstanding Beauty. All recommendations received have been incorporated in the scoping report and will be carried forward into the main body of the Environmental report. Comments received from the Chilterns Conservation Board were especially helpful and enabled a Policy to be added regarding the Chilterns Area of Outstanding Natural Beauty.

### **KEY DOCUMENTS**

National Planning Policy Framework (2012)

https://www.gov.uk/government/publications/national-planning-policy-framework--2

Adopted saved policies from SODC Local Plan (2011)

http://www.southoxon.gov.uk/sites/default/files/Summary%20of%20Policies.pdf

Adopted SODC Core Strategy (2012) <a href="http://www.southoxon.gov.uk/services-and-advice/planning-and-building/planning-policy/core-strategy/adopted-cor

Emerging strategic policies of the new SODC Local Plan 2033

http://www.southoxon.gov.uk/ccm/support/dynamic\_serve.jsp?ID=776170511&CODE=D2E 6F03567847CD279E120E088D3DB19

Landscape Capacity Assessment: Sites on the Edge of larger Villages of South Oxfordshire, Main Report 2015, Kirkham Landscape Planning Ltd and Terra Firma Consultancy <a href="http://www.southoxon.gov.uk/services-and-advice/planning-and-building/planning-policy/evidence-studies">http://www.southoxon.gov.uk/services-and-advice/planning-and-building/planning-policy/evidence-studies</a>

Landscape Character Assessment for the local plan 2033, Lepus Consulting 2017 <a href="http://www.southoxon.gov.uk/ccm/support/dynamic\_serve.jsp?ID=788092192&CODE=465">http://www.southoxon.gov.uk/ccm/support/dynamic\_serve.jsp?ID=788092192&CODE=465</a> 0A3652852911819269B1BB795E501 .

## Appendix 1 – Extract from 'A Practical Guide to the Strategic Environmental Assessment Directive' (DCLG) (2005)

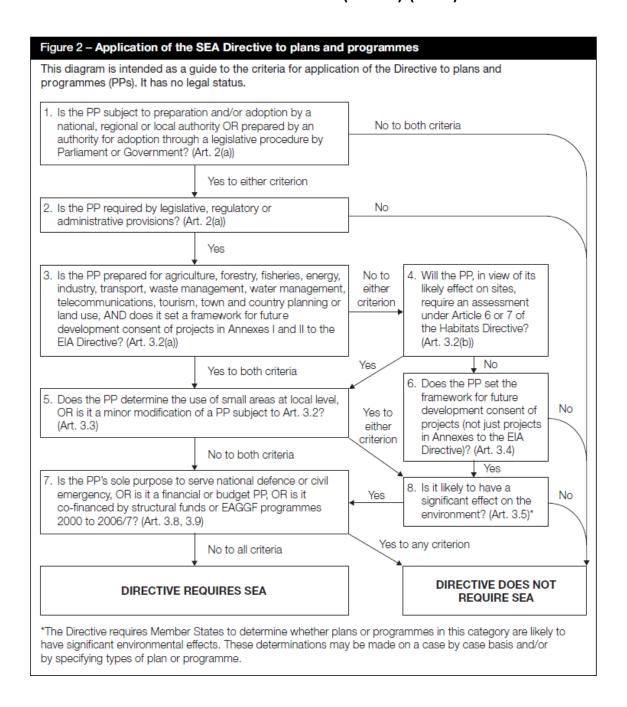


Table 1: Application of SEA Directive as shown in Appendix 1

Stage	Y/N	Explanation
1. Is the Neighbourhood Plan subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	Y	The preparation of and adoption of the Neighbourhood Development Plan is allowed under the Town and Country Planning Act 1990 as amended by the Localism Act 2011. The Neighbourhood Plan is being prepared by the Crowmarsh NDP Steering Group, a working group who report to the Crowmarsh Gifford Parish Council (as the "relevant body") and will be "made" by South Oxfordshire District Council as the local authority. The preparation of Neighbourhood Plans is subject to the following regulations:  • The Neighbourhood Planning (General) Regulations 2012  • The Neighbourhood Planning (General) (Amendment) Regulations 2015
2. Is the NP required by legislative, regulatory or administrative provisions? (Art. 2(a))	Υ	Whilst the Neighbourhood Development Plan is not a requirement and is optional under the provisions of the Town and Country Planning Act 1990 as amended by the Localism Act 2011, it will, if "made", form part of the Development Plan for the District. It is therefore important that the screening process considers whether it is likely to have significant environmental effects and hence whether SEA is required under the Directive.
3. Is the Neighbourhood Plan prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications,	N	The Crowmarsh NDP is prepared for town and country planning and land use and will set out a framework for future development in Crowmarsh Gifford, including the development of residential uses. However, these projects are not of the scale referred to in Article 4(2) of the EIA Directive –

tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II (see Appendix 2) to the EIA Directive? (Art 3.2(a))		listed at Annex II of the directive.
4. Will the Neighbourhood Plan, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))	N	The Crowmarsh NDP is unlikely to have significant effects on Natura 2000 sites.
5. Does the Neighbourhood Plan determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art. 3.2? (Art. 3.3)		The Crowmarsh NDP will determine the use of sites/small areas at a local level.
6. Does the Neighbourhood Plan set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3.4)	Y	When made, the Crowmarsh NDP will include a series of policies to guide development within the village and will allocate sites for specific development. This will inform the determination of planning applications providing a framework for future development consent of projects.
7. Is the Neighbourhood Plan's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art 3.8, 3.9)	N	N/A
8. Is it likely to have a significant effect on the environment? (Art. 3.5)	Y	Likely significant effects upon the environment have been identified. See assessment of the likely significance of effects on the environment in Appendix 3.

# Appendix 2 - Assessment of the likely significance of effects on the environment

[Note to author – most of these boxes contain standard text (greyed out). Those where specific details need to be included are Qs 1a,c,d, 2a,b,e,f and g]

1. Characteristics of the Plan, having regard to:					
(a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;	The Crowmarsh NDP would, if adopted, form part of the Statutory Development Plan and as such does contribute to the framework for future development consent of projects. However, the Plan will sit within the wider framework set by the National Planning Policy Framework, the strategic policies of the South Oxfordshire Core Strategy (2012) and Local Plan 2011 (2006); and the emerging South Oxfordshire Local Plan 2033. The largest of the three site allocations for residential development proposed by the Crowmarsh NDP (for 100 houses) has been considered as part of the SEA and HRA of those higher level plans.				
(b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;	A Neighbourhood Development Plan must be in conformity with the Local Plan for the District. It does not influence other plans.				
(c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;	National policy requires a presumption in favour of sustainable development, which should be seen as a golden thread through plan-making, including the Crowmarsh NDP. A basic condition of the Crowmarsh NDP is to contribute to the achievement of sustainable development. The NDP contains policies to deliver 110 homes, which has been assessed via the SEA of the emerging Local Plan as contributing positively to sustainable development in the area by providing needed residential development.				
(d) environmental problems relevant to the plan or programme; and	The Crowmarsh Gifford designated area contains the following environmental designations:  • Conservation area  • Listed buildings  • Ancient monuments  • Ancient Woodland  • Area of Outstanding Natural Beauty				
(e) the relevance of the plan	The proposed development in the				

or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).  2. Characteristics of the efficiency of the service of the service implement of the service of t	Crowmarsh NDP has been judged not to have an impact on Community legislation as the level of development proposed has been included as part of the SEA and HRA of the emerging Local Plan.  fects and of the area likely to be affected,
having regard, in particular,	to:
(a) the probability, duration, frequency and reversibility of the effects;	The Crowmarsh NDP is likely to have irreversible environmental effects, local in scale. The plan is also likely to have positive social effects through the provision of residential development.
(b) the cumulative nature of the effects;	It is intended that the positive social effects of providing residential development will have positive cumulative benefits for the area.
(c) the transboundary nature of the effects;	The effects of the Plan are unlikely to have transboundary <sup>1</sup> impacts.
(d) the risks to human health or the environment (for example, due to accidents);	The policies in the plan are unlikely to present risks to human health or the environment.
(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);	The Crowmarsh NDP relates to the parish of Crowmarsh Gifford, which includes the villages of North Stoke and Mongewell. The scale of development proposed is small and therefore the potential for environmental effects is also likely to be small and localised.
(f) the value and vulnerability of the area likely to be affected due to: (i) special natural characteristics or cultural heritage; (ii) exceeded environmental quality standards or limit values; or (iii) intensive land-use; and	The Crowmarsh Gifford designated area contains the following designations:  • Conservation area  • Listed buildings  • Ancient monuments  • Ancient Woodland  • Area of Outstanding Natural Beauty
(g) the effects on areas or landscapes which have a recognised national, Community or international protection status.	There is potential vulnerability on the Chilterns AONB from the sites proposed for allocation. The SEA of the emerging Local Plan suggests that a landscape and visual impact assessment would be required to

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<sup>&</sup>lt;sup>1</sup> Transboundary effects are understood to be in other Member States.

determine the capacity of sites.

### Appendix 3 – Responses from statutory consultees to draft scoping report

Date: 25 July 2018 Our ref: 250309

Crowmarsh Parish Neighbourhood Plan Steering Group

BY EMAIL ONLY



Customer Services Hornbeam House Crewe Business Park Electra Way Crewe Cheshire CW1 6GJ

T 0300 060 3900

Dear Sir or Madam,

### Planning Consultation: Crowmarsh Neighbourhood Plan- SEA Scoping Report

Thank you for your consultation on the above dated 21st June 2018.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where our interests would be affected by the proposals made.

In our review of the Crowmarsh Neighbourhood Plan Strategic Environmental Assessment (SEA) scoping report we are not satisfied with the scope and contents of the proposed SEA.

We have specific comments to make about the assessment criteria used:

- Key Message from Policy Context: Threats to biodiversity and opportunities to enhance it (in Table 2)- We advise adding criteria here to assess the Plan's policies and development allocations. More specific criteria is needed to fully assess the potential impacts on the natural environment. Criteria include: "will the policy/proposal protect and enhance priority habitats and the habitats of protected species (NPPF para. 174); achieve a net gain in biodiversity (NPPF paras. 170, 174, 175); support enhancements to multifunctional green infrastructure networks /corridors (NPPF paras. 170, 171); support access to green open spaces and nature?"
- Conserving and enhancing the Chilterns AONB- We recommend specifically mentioning
  conserving and enhancing the Chilterns AONB in an objective and advise you add specific
  criteria or assessment questions to ensure great weight is given to protecting the Chilterns
  AONB, in line with Paragraph 172 of the revised NPPF. Criteria would include: "is the
  development site within a protected landscape or its setting; is the site sufficiently screened;
  does the site impact on important views into and out from the AONB or its setting?"

In light of the advice given above, we further recommend you revisit the scoring strategy so that it takes into account the more detailed criteria. This will ensure that all policies and proposals in the Plan are assessed thoroughly.

### Protected Landscapes

As the Neighbourhood Plan area is largely within the Chilterns AONB, Natural England advises that you use national and local policies, together with local landscape expertise and information to make this assessment.

Alongside national policy you should also apply landscape policies set out in your development plan, or appropriate saved policies.

We also advise that you consult the relevant AONB Partnership or Conservation Board. Their knowledge of the site and its wider landscape setting, together with the aims and objectives of the AONB's statutory management plan, will be a valuable contribution to the assessment. Where available, a local Landscape Character Assessment can also be a helpful guide to the landscape's sensitivity to development and its capacity to accommodate the proposed development.

The statutory purpose of the AONB is to conserve and enhance the area's natural beauty. You should assess whether the Plan policies would have a significant impact on or harm that statutory purpose. Relevant to this is the duty on public bodies to 'have regard' for that statutory purpose in carrying out their functions (S85 of the Countryside and Rights of Way Act, 2000). The Planning Practice Guidance confirms that this duty also applies to proposals-outside the designated area but impacting on its natural beauty.

For further detail on these topics please refer to Annex A.

For clarification of any points in this letter, please contact me Milena Petrovic at milena.petrovic@naturalengland.org.uk or on 02080267824.

Yours sincerely,

Milena Petrovic Adviser Sustainable Development Thames Team

### Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

### **Natural Environment Information Sources**

The Magic¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones). Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available here².

**Priority habitats** are those habitats of particular importance for nature conservation, and the list of them can be found <a href="https://example.com/here3">here3</a>. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

**National Character Areas** (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found <a href="https://example.com/heart-state-sta

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the <u>Magic</u><sup>5</sup> website and also from the <u>LandIS website</u><sup>6</sup>, which contains more information about obtaining soil data.

### Natural Environment Issues to Consider

The <u>National Planning Policy Framework</u><sup>7</sup> sets out national planning policy on protecting and enhancing the natural environment. Planning Practice Guidance<sup>8</sup> sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

2 http://www.nbn-nfbr.org.uk/nfbr.php

6 http://www.landis.org.uk/index.cfm

<sup>1</sup> http://magic.defra.gov.uk/

<sup>&</sup>lt;sup>3</sup>http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx

<sup>4</sup> https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making

<sup>5</sup> http://magic.defra.gov.uk/

<sup>7</sup> https://www.gov.uk/government/publications/national-planning-policy-framework--2

<sup>8</sup> http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/

### Internationally and Nationally Designated Sites

If there are designated sites within your parish the SEA should thoroughly assess the potential for the Plan to affect designated sites, including direct and indirect impacts. European sites (eg designated Special Areas of Conservation and Special Protection Areas) fall within the scope of the Conservation of Habitats and Species Regulations 2010. Nationally designated sites (eg SSSI) are protected under the Countryside and Right of Way Act 2000. In addition paragraph 118 of the National Planning Policy Framework requires that potential Special Protection Areas, possible Special Areas of Conservation, listed or proposed Ramsar sites, and any site identified as being necessary to compensate for adverse impacts on classified, potential or possible SPAs, SACs and Ramsar sites be treated in the same way as classified sites.

The SEA should detail how impacts to designated sites will be avoided, mitigated or, as a last resort, compensated for

### Regionally and Locally Important Sites

If there are local wildlife sites within your parish the SEA should thoroughly assess the potential for the Plan to affect these sites, including direct and indirect impacts. If there are likely to be any adverse impacts you'll need to provide information about how such impacts will be avoided, mitigated or, as a last resort, compensated for.

### Wildlife habitats

Some proposals can have adverse impacts on priority habitats (listed <a href="here">here</a> ) or <a href="Ancient woodland">Ancient woodland</a> 10. If there are likely to be any adverse impacts you'll need to provide information about how such impacts will be avoided, mitigated or, as a last resort, compensated for.

### Priority and protected species and habitat

You'll also want to consider whether any proposals might affect priority habitats or species (listed <a href="https://nere11">here11</a>) or protected species. To help you do this, Natural England has produced advice <a href="https://nere12">here12</a> to help understand the impact of particular developments on protected species. Consideration should also be given to the potential environmental value of brownfield sites, often found in urban areas and former industrial land, further information including links to the open mosaic habitats inventory can be found here.

### Ancient woodland and veteran trees

You should consider whether your Plan impacts on ancient woodland or veteran trees as required by paragraph 118 of the NPPF. Natural England maintains the Ancient Woodland Inventory which can help identify ancient woodland. Natural England and the Forest Commission have produced standing advice for planning authorities in relation to ancient woodland and veteran trees. It should be taken into account when determining relevant plan policies.

### Biodiversity net gain

Under section 40 of the Natural Environment and Rural Communities Act 2006 Local Planning Authorities are required to conserve biodiversity. The NPPF section 109 states "the planning system should contribute to and enhance the natural and local environment by minimising impacts on biodiversity and providing net gains in biodiversity wherever possible". Suitable methods for calculating biodiversity net gain can include the Defra biodiversity offsetting metric<sup>13</sup> and the

http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx

<sup>10</sup> https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences

<sup>&</sup>lt;sup>11</sup>http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx

<sup>12</sup> https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals

<sup>&</sup>lt;sup>13</sup> https://www.gov.uk/government/collections/biodiversity-offsetting#guidance-for-offset-providers-developers-and-local-authorities-in-the-pilotareas Note; the 'Guidance for developers' and 'Guidance for offset providers' documents provide a calculation method.

environment bank biodiversity impact calculator14. Natural England would expect a policy within the Neighbourhood Plan to include wording to ensure that net biodiversity gain is achieved.

#### Green Infrastructure

Your Plan can offer exciting opportunities to enhance your local environment through inclusion of green infrastructure (GI). Green infrastructure can help you provide the required 'biodiversity net gain' and also comply with the NPPF paragraphs 109 and 118. If you are setting out policies on new development or proposing sites for development, you should identify what environmental features you want to be retained, connected, enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing greenspace in line with the Accessible Natural Greenspace Standards (ANGSt).
- Providing a local wildlife site.
- Providing landscaped footpaths through the new development to link into existing rights of way or neighbouring greenspace.
- Restoring neglected hedgerows and creating new ones.
- Creating ponds as part of the SUDS and as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Avoid using non-native invasive plants in landscaping and greenspace plantings
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Designing lighting to encourage wildlife.
- Adding a green roof and vertical gardens to new buildings...

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your Plan how you would like to implement elements of a wider Green Infrastructure Strategy in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see Planning Practice Guidance on this 15).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition or clearing away an eyesore).

### Landscape

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, you will need to carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds,

<sup>14</sup> http://www.environmentbank.com/impact-calculator.php, and

http://www.google.co.uk/url?sa=t&rct=j&g=&esrc=s&source=web&cd=3&ved=0ahUKEwj7vcbl0aDQAhVMDcAKHb8IDEUQFggsMAl&url=http %3A%2F%2Fconsult.welhat.gov.uk%2Ffile%2F4184236&usg=AFQjCNFfkbJIJQ\_UN0044Qe6rmiLffxckg

15 http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-

way-and-local-green-space/local-green-space-designation/

woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

### Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development allocations, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see our publication Agricultural Land Classification: protecting the best and most versatile agricultural land 16.

<sup>16</sup> http://publications.naturalengland.org.uk/publication/35012



Dr Nick Robins Steering Group Manager Crowmarsh Parish Neighbourhood Plan Our ref: Your ref:

Telephone

01483 252040

Fax

2<sup>nd</sup> July 2018

Dear Dr Robins,

### **Crowmarsh Parish Neighbourhood Plan SEA Scoping Report Consultation**

Thank you for your e-mail of 12<sup>th</sup> June inviting Historic England to comment on the Crowmarsh Neighbourhood Plan SEA Scoping Report. We are pleased to make the following general and specific comments in line with our remit as the Government's advisers on the historic environment.

General guidance on Sustainability Appraisal and the historic environment is set out in Historic England's publication "Strategic Environmental Assessment, Sustainability Appraisal and The Historic Environment": http://www.historicengland.org.uk/ images-books/publications/strategic-environ-assessment-sustainability-appraisal-historic-environment/.

Turning to our specific comments, although more a comment for the neighbourhood plan itself, we are disappointed to see no mention of the historic environment of the parish in the Vision but welcome the third key objective in principle. However, we would prefer "conserve and enhance" which are the words used in the National Planning Policy Framework and "significance, character and appearance" ("significance" is what is important about a heritage asset).

We believe that the North Stoke Conservation Area is also within the parish and we would therefore welcome the inclusion of a reference to conserving and enhancing the special interest, character and appearance of the Conservation Area, either within the third objective or as a new objective.

We welcome the recognition of "Good Design" and "Conserving and enhancing the historic environment" as particularly relevant messages from the National Planning Policy Framework.

Paragraph 58 of the Framework that "neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be

expected for the area......based on stated objectives for the future of the area and an understanding and evaluation of its defining characteristics".

Has there been a characterisation of the Plan area to provide that "understanding and evaluation"? Historic England considers that Neighbourhood Development Plans should be underpinned by a thorough understanding of the character and special qualities of the area covered by the Plan.

We therefore suggest a characterisation study as a precursor to neighbourhood plans as such a study can help inform locations and detailed design of proposed new development, identify possible townscape improvements and establish a baseline against which to measure change. If no such characterisation exists then this should be identified as a gap in the baseline.

We welcome paragraph 2.7 in principle. However, we consider that it should be a more comprehensive picture of the historic environment in the parish. For example, it could note that there are 48 listed buildings in the parish, two of which are Grade I and three Grade II\*. Is there a list of locally important buildings? If not, then this should be identified as a gap in the baseline, and this could be a project to contribute to the evidence base for the Neighbourhood Plan.

Reference should be made to the Oxfordshire Historic Environment Record for details of archaeological finds in the parish, some of which may be of national importance. The National Planning Practice Guidance advises that Neighbourhood Plans should include enough information, where relevant, "about local heritage to guide decisions and put broader strategic heritage policies from the local plan into action at a neighbourhood scale" and "about local non-designated heritage assets including sites of archaeological interest to guide decisions". We will look for this in the Neighbourhood Plan.

When was the Conservation Area designated? What is its special interest (the reason for its designation?) Is there a Character Appraisal and/or Management Plan for the Conservation Area? If not, then this should also be identified as a gap in the baseline, and this could be another project to contribute to the evidence base for the Neighbourhood Plan.

We welcome the sustainability objective: "To conserve and enhance the Parish's built heritage for its historic significance and important contribution to local distinctiveness, character and sense of place", although we would suggest omitting "built" as not all heritage is built.

We note that the Scoping Report appears to end at stage A.2 of the SEA process – it does not include stages A.3 or A.4 as set out in Table 1: "3. Identification of Sustainability Issues. The review of plans and policies, together with the baseline information are used to identify the key sustainability issues which could impact the plan" and "4. Development of the SEA/SA Framework. The assessment criteria used to assess the impact of the plan or programme."

As regards the historic environment, the potential effects of new development on the heritage assets of the parish and the condition of those assets are potential sustainability issues.

The Historic England Heritage at Risk Register has the North Stoke Henge and Ring Ditch site scheduled monument as being at risk. However, the Register does not include Grade II listed secular buildings outside London. Has there been a survey to ascertain whether or any Grade II listed buildings in the Plan area are at risk of neglect, decay or other threats? If not, then this too should be identified as a gap in the baseline and could be another project to contribute to the evidence base for the Plan.

Has there been any or is there any ongoing loss of character, particularly within the Conservation Area, through inappropriate development, inappropriate alterations to properties under permitted development rights, loss of vegetation, insensitive streetworks etc?

We would expect the Scoping Report to set out the indicators or measures by which the policies and proposals of the Plan can be assessed against the objectives and sub-objectives. The Historic England advice on Strategic Environmental Assessments and the Historic Environment contains a range of possible indicators for assessing and monitoring the performance of the policies and proposals of the Plan against a historic environment objective. Not all of these will be relevant, but we suggest that the following be considered:

- the number and percentage of different heritage assets at risk;
- the percentage of planning applications where archaeological investigations were required prior to approval; and
- the percentage of planning applications where archaeological mitigation strategies were developed and implemented.

We hope these comments are helpful, but please contact me if you have any queries.

Yours sincerely,

MartinSmall

Martin Small

Principal Adviser, Historic Environment Planning (Bucks, Oxon, Berks, Hampshire, IoW, South Downs National Park and Chichester)

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### **ENVIRONMENT AGENCY**

No response received