

Consultation on the Strategic Environmental Assessment of the Hailey Neighbourhood Plan

Consultation period: 1st May – June 6th 2018

Results of the consultation

Date: 01 June 2018
Our ref: 245884
Your ref: Hailey Neighbourhood Plan

Mr Graham Knaggs
Chairman Hailey Parish Council



BY EMAIL ONLY

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Dear Mr Knaggs

Strategic Environmental Assessment of Hailey Neighbourhood Plan

Thank you for your consultation on the above dated 02 May 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 they consider our interests would be affected by the proposals made..

Natural England does not have any specific comments on this SEA.

For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Sharon Jenkins
Consultations Team



Historic England

Mr Graham Knaggs
Chairman, Hailey Parish Council

Our ref: HD/P5356/
Your ref:
Telephone 01483 252040
Fax

5th June 2018

Dear Mr Knaggs,

Hailey Neighbourhood Plan: Strategic Environmental Assessment

Thank you for your e-mail of 1st May 2018 inviting the comments of Historic England on the Strategic Environmental Assessment of the Hailey Neighbourhood Plan.

We do not appear to have been consulted on the SEA Scoping Report but we welcome Sustainability Objective 30 and its Sub-Objectives, although we prefer landscape and the historic environment to be considered separately as they are both significant issues, each worthy of consideration in their own right.

According to the National Heritage List for England Hailey parish has 27 listed buildings and part of a scheduled monument, which means that there may be two errors in paragraph 3.15 of the report. This section should also refer to any locally important heritage assets and/or archaeological remains.

We have previously identified that, according to our records, neither of the two housing site allocations proposed in the Plan would be likely to affect the significance or special interest of a designated heritage asset, but they may have an impact on locally important buildings or archaeology.

With no reference to either of these as noted above, we cannot be reasonably confident that the conclusion in paragraph 4.26 that the proposed development sites would not result in any significant negative effects is correct.

We hope you find these comments helpful. However, should you wish to discuss any points within this letter, please do not hesitate to contact us.

Thank you again for consulting Historic England.

Yours sincerely,



Martin Small Principal Adviser, Historic Environment Planning



Persimmon Homes (Wessex)

Draft Hailey Neighbourhood Plan

Representations on the Strategic Environmental Assessment (SEA)
Environmental Report

June 2018

Persimmon Homes (Wessex) representations to the Hailey Neighbourhood Plan SEA Report
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Persimmon Homes (Wessex) representations to the Hailey Neighbourhood Plan SEA Report

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We write with reference to the above and welcome the opportunity to submit comments on the Hailey Neighbourhood Plan (HNP) Strategic Environmental Assessment (SEA) Environmental Report, which has been prepared by Enfusion on behalf of Hailey Parish Council. Please treat this as our formal representations, duly made within the consultation period.

Persimmon Homes is actively engaged with the delivery of various strategic and non-strategic mixed use and residential schemes in Oxfordshire and so we are well placed to comment on the HNP.

We recognise the level of effort involved in preparing Neighbourhood Plans and are supportive of communities that seek to plan positively for development to identify and address the local spatial planning issues important to them through this means. Persimmon has worked proactively in collaboration with numerous Neighbourhood Plan Steering Groups across the country where we have land interests that have been allocated for new homes to help deliver the objectives of these communities.

Persimmon Homes owns an area of land to the west of Hailey Road, located within the designated Hailey Neighbourhood Area. The area of land controlled by Persimmon (circa 5.5 hectares) is located circa 1km to the south of the village of Hailey, adjacent to the North Witney Strategic Development Area allocated in the draft West Oxfordshire Local Plan.

The area of land controlled by Persimmon Homes is shown in Appendix 1 of these representations. The HNP uses 'FOX01' as a reference for this site in the brief assessment of the site set out in appendix K of the draft HNP. The land is referred to as part of site 346 in the West Oxfordshire SHELAA and has been promoted for inclusion within the North Witney Strategic Development Area. Persimmon Homes objects to the proposed identification of this site as a "buffer zone" under policies E4 and E5 of the draft HNP. Through careful masterplanning, the site has the ability to contribute to the local housing need and such a restrictive policy would impede this potential.

We would welcome the opportunity to discuss the site with the HNP Steering Group. However these representations consider the SEA process only.

Persimmon Homes (Wessex) representations to the Hailey Neighbourhood Plan SEA Report

Persimmon Homes supports the preparation of the HNP.

Persimmon Homes supports the SEA process, which, as enshrined within the European Union SEA Directive, is used to help choose between alternatives and inform development plan preparation. For neighbourhood development plans, the SEA process will be considered by the independent examiner in respect of basic condition 'f' which requires that the making of a neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.

The Environmental Report (ER) prepared by Enfusion documents the process of SEA in relation to the HNP. Paragraph 1.7 of the ER confirms the main purpose of the HNP SEA process as follows:

"It was determined that the HNP falls within the scope of the SEA Regulations as it includes Policies that allocate housing development and which have not been subject to previous SA/SEA during the preparation of the new Local Plan. It was considered that only a limited SEA was needed to address the proposed site allocations, taking into account the stage of the new Local Plan that is now close to

adoption.”

The HNP ER uses the same SEA objectives as applied to the draft West Oxfordshire Local Plan. At paragraph 17, the ER concludes that “overall, the SEA found positive effects for environmental objectives for housing, human health, communities and accessibility – with particular positive effects for affordable housing.” It is unclear how this conclusion on affordable housing has been reached given that the draft HNP identifies one site for 8 homes (no affordable) and another site for circa 15 homes (6 affordable homes) for the plan period up to the year 2031.

The ER is clear in establishing that the principal focus of the SEA process has been to assess the proposed site allocations.

However, the Strategic Environmental Assessment of the proposed site allocations and options that has been undertaken is flawed for two main reasons:

- i. The failure to adequately consider ‘reasonable alternatives’ to the preferred option set out in the HNP
- ii. A lack of evidence to demonstrate that the SEA has in any way influenced the preparation of the HNP.

Persimmon Homes (Wessex) representations to the Hailey Neighbourhood Plan SEA Report

The evaluation of the likely significant environmental effects of implementing the development plan and reasonable alternatives taking into account the objectives and the geographical scope of the plan is key to the SEA process.

Paragraph 38 of the national planning practice guidance on SEA states “*The strategic environmental assessment should predict and evaluate the effects of the preferred approach and reasonable alternatives and should clearly identify the significant positive and negative effects of each alternative [...] The strategic environmental assessment should outline the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives.*”

Objective 1 of the SEA Framework for testing the HNP is “*to ensure everyone has the opportunity to live in a decent, sustainable constructed affordable home*”. This need for housing is reinforced in the goals set out within the draft HNP.

The land to the west of Hailey Road is within the geographical scope of the plan, established by the designated Hailey Neighbourhood Area.

It is therefore considered that it would be reasonable to assess the potential for this site to contribute towards meeting the housing need, as an alternative option to the site allocations identified within the draft HNP.

Instead, the ER only assesses three ‘reasonable alternatives’ for delivering the objectives for housing. These three sites are the two proposed to be allocated in the draft HNP and a third site that already benefits from Outline planning permission.

It is considered that the land to the west of Hailey Road should be subject to a more detailed assessment against the SEA objectives. A proposed SEA assessment of the site is set out below.

Proposed Sustainability Appraisal of the Land to the West of Hailey Road

HNP Ref	Capacity	SA Objective																
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	
FOX01	Circa 100	++	++	++	+	0	+	-	0	0	0	0	0	0	0	0	0	+

Persimmon Homes (Wessex) representations to the Hailey Neighbourhood Plan SEA Report

As stated in paragraph 38 of the national planning practice guidance, “*The development and appraisal of proposals in the neighbourhood plan should be an iterative process, with the proposals being revised to take account of the appraisal findings. This should inform the selection, refinement and publication of the preferred approach for consultation.*”

It is unclear how SEA has influenced the plan-making process. The SEA appears to have been undertaken at the end of the process following the publication of the draft HNP and therefore the plan has not been prepared in an iterative manner.

LAND OWNED BY PERSIMMON HOMES WITHIN HAILEY PARISH

APPENDICIES

LAND OWNED BY PERSIMMON HOMES WITHIN HAILEY PARISH



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Connells Land & Planning

BRIDELWAYS

Responses were received from 2 residents and 4 non-residents concerning bridleways. Here is a summary which includes comments from the Access and Bridleways Officer of the British Horse Society. **Some editing has occurred in an effort to avoid repetition**

Hailey Parish has 6+ Livery yards in their area. They contribute to the local economy. Their needs for safe off-road tracks are as important as for walkers and cyclists. It is important that 'Bridleways' and 'horserider' are included in the plan, alongside walkers / cyclists.

As the mother of a 5 year old little girl who rides in the area, there is no mention for riders who also need safe bridleways. This will prevent young riders having to use the roads that are becoming more dangerous. With safer bridleways more children will be able to ride and improve their health.

With ever increasing traffic, many of the surrounding rural roads are used as 'rat runs' making them busy and dangerous for all venerable road users.

None of the current bridleways are connected and so you have to ride on the roads to get to them. There is a need to not only create new bridleways but to re-establish and improve / upgrade what is already there. That will then allow more off road, safer riding, allowing us to enjoy the countryside alongside walkers and cyclists. With the emphasis now on health and well-being the lack of something as simple as a bridleway is just preventing us being able to enjoy our chosen activity to the fullest.

The council needs to think more about the safety of minority groups – Yes walkers BUT also cyclists, disabled / mobility scooters, child buggies and horse riders. More footpaths should be upgraded via DMMOs so riders have more opportunities to keep off the highways. Poffley End now has a massive traffic problem since the W.O College was built. Double decker buses and hundreds of student cars every day. The road is no longer a quiet place to ride / walk / cycle but now main road traffic levels using an unsuitable small road. More houses in the local parishes means many more vehicles on the small rural roads – minority users need routes available away from the danger of fast vehicles.

GALK

11TH June 2018