

BRIGHTWELL-CUM-SOTWELL PARISH NEIGHBOURHOOD PLAN

2016 – 2032

SUSTAINABILITY APPRAISAL REPORT (incorporating a Strategic Environmental Assessment)

Brightwell cum Sotwell
Neighbourhood Plan



Published by Brightwell-cum-Sotwell Parish Council to accompany the Submission Brightwell-cum-Sotwell Parish Neighbourhood Plan under the Neighbourhood Planning (General) Regulations 2012 and in accordance with EU Directive 2001/42 and the Environmental Assessment of Plans & Programmes Regulations 2004.

February 2017

NON-TECHNICAL SUMMARY

1. The purpose of this Sustainability Appraisal Report is to provide an assessment of any significant social, environmental and economic effects resulting from the policies and proposals of the Submission version of the Brightwell-cum-Sotwell Parish Neighbourhood Plan. The designated Neighbourhood Area coincides with the parish boundary and comprises primarily the village of Brightwell cum Sotwell to the immediate west of Wallingford.

2. The Neighbourhood Plan has been agreed for submission by Brightwell-cum-Sotwell Parish Council to the local planning authority, South Oxfordshire District Council, under the Neighbourhood Planning Regulations 2012. The District Council issued a screening opinion requiring an SEA and the Parish Council has chosen to meet this obligation by preparing a Sustainability Appraisal (SA) under the Environmental Assessment of Plans & Programmes Regulations 2004. The Draft SA/SEA report was consulted on alongside the Pre Submission Neighbourhood Plan in November 2016 – January 2017. The comments made on both documents have been considered by the Parish Council and minor modifications have been made to the final versions of the Plan and this report.

3. The Neighbourhood Plan contains 17 policies for the use and development of the land in the Parish of Brightwell in the plan period up to 2032. These policies, together with the policies of the Local Plan and the National Planning Policy Framework (NPPF) will be used by the District Council to help determine planning applications once the Neighbourhood Plan is approved in due course. Although not yet adopted, the Neighbourhood Plan has been informed by the reasoning and evidence base of the emerging Local Plan.

4. The Vision for Brightwell cum Sotwell Parish is:

“To retain our separate identity as a rural parish set within open countryside, conserving the character of the various settlements; in a way that allows the community to evolve whilst sustaining our core vital services”

5. To achieve this vision a number of key objectives have been identified as follows:

- Conserve and enhance the essential rural character of the Parish and its settlements by growing the main village in small places that form part of the established pattern of development and by conserving the existing network of trees, hedgerows, wetlands and wildlife sites
- Sustain the sensitive landscape setting of the main settlement and the intrinsic relationship between ‘village’ and ‘working farmland’ by avoiding harmful development in the AONB and by preventing any further elongation of the settlement into the countryside or precious village green spaces
- Encourage the use of well-located, non-productive, agricultural or horticulture land on the periphery of the main village to minimise the need for building on open / green field land
- Sustain and enhance the character and appearance of the Conservation Areas and Listed Buildings of the Parish and their settings
- Protect the remaining community core facilities and services from unnecessary loss and encourage proposals to sustain and improve their viability

- Rebalance the community profile of the main village to help sustain the core village facilities by planning for new homes suited to first time buyers and young families and by enabling older residents to remain in the village and to make their larger homes available to new residents

6. The essence of the overall planning strategy for the District has been and will continue to be to focus development on the main towns and larger villages of the District and to maintain the rural character of the open countryside that makes up the majority of the area. The Parish does not lie within an area planned for significant growth and is currently considered a 'smaller village'.

7. The main sustainability issues in the Parish to which the Neighbourhood Plan responds are outlined below:

- Affordability of all forms of housing within the Parish.
- Difficulty of moving house within the Parish.
- Little scope for downsizing.
- Modern developments have tended to reduce the rural feel of the Parish
- Difficult for new entrants to the market and for older residents to downsize
- Increasing traffic on the A4130 bisects the parish.
- There is increasing noise and light pollution.
- Developments risk affecting views to/from the AONB and causing visual coalescence with Wallingford.
- Some fields adjacent to the main settlement are owned by land banks and the edge of settlement is poorly defined
- Developments may increase risk of groundwater flooding or be subject to it
- Increased population will increase pressure on resources, possibly exacerbated by climate change
- Loss of gardens to infill and of traditional old orchards
- Brownfield sites often rich on wildlife
- Inappropriate development may cause significant detriment
- Inappropriate speed limits.
- Excessive on-street parking.
- Safety of cyclists and walkers
- Modern developments and subsequent loss of vegetation have tended to reduce the rural feel of the Parish

8. Brightwell-cum-Sotwell is located in the County of Oxfordshire, and is 2.2 miles away from Wallingford and 3.6 miles from Didcot. The population of Brightwell-cum-Sotwell is currently 1,550. The parish Facilities include The Churches (St. James and St. Agatha's), the Village School (and Pre-school), the village stores, post office, Red Lion pub, village hall and the Rec and Pavillion. Transport links include First Great Western Trains providing a fast link to Oxford, Reading and London from Didcot, while Cholsey has local stopping services. There are two conservation areas – the largest covering most of the village of Brightwell-cum-Sotwell and the other covering Mackney. There are 50 listed buildings in the Parish, which is a relatively high concentration in a small area, and their prominence and cumulative effects play a very significant role in defining the character of the Parish.

9. The Parish is set around the east-west ridge of the Sinodun Hills running from Wittenham Clumps across Brightwell Barrow towards Wallingford. To the south is a flat area of farmland and to the north, the River Thames forms the parish boundary as it meanders through its floodplain. A large part of the Parish lies within the North Wessex Downs Area of Outstanding Natural Beauty (AONB). Sotwell and Brightwell are linear villages stretching 2km along the southern flank of the hills. The A4130 skirts the settlement on three sides but from every aspect views of the settlement are mainly of surrounding farmland, with only a few village buildings and mature trees showing. The Parish is situated just west of the River Thames and is also surrounded by the Mill Brook and Kibble Ditch, which are both susceptible to flood risk and there is therefore land that falls within flood zones 2 and 3 (as shown on the Environment Agency mapping). The same mapping also shows there are some areas susceptible to surface water flooding in the Parish.

10. Given the Neighbourhood Plan must contribute to the achievement of sustainable development to meet its basic conditions, and must win the support of the local community in due course, it is not surprising that there is a reasonably strong correlation between the objectives of the Plan and of the Appraisal.

11. The assessment indicates that the preferred policies of the Submission Plan have avoided leading to any significant negative environment effects and will contribute, in overall terms, to achieving a sustainable pattern of growth and consolidation in the village. This is no mean feat, given the scale of development that the Plan provides for, which far exceeds the scales of housing growth in the village of the last few decades. Crucially, the spatial strategy has found ways of infilling some of the edges of the village that retain its essential shape and character, without requiring incursions into the surrounding countryside. Its neutral effect in this regard contrasts with the negative effects of the reasonable alternative spatial options tested.

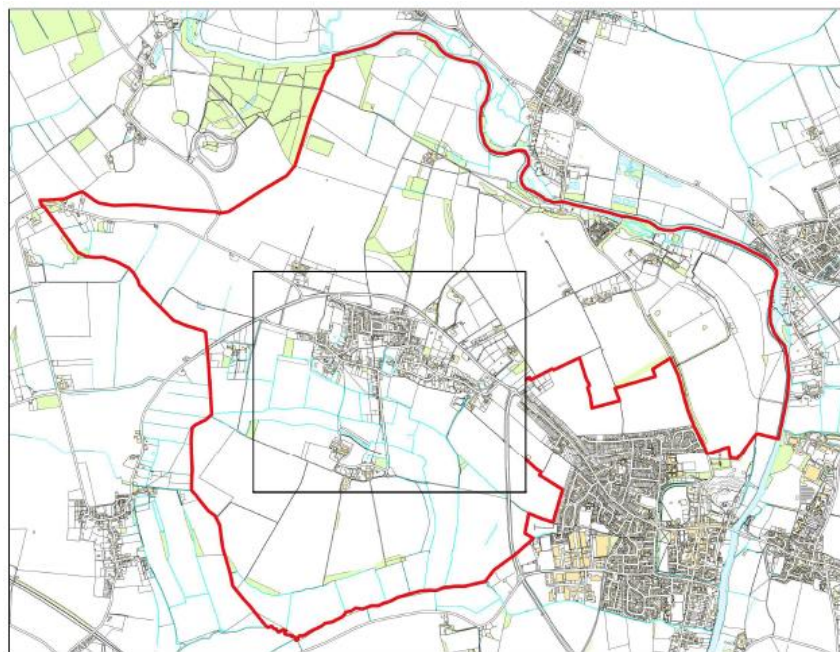
12. Not all the policies will have neutral effects. Some will have positive effects, especially in terms of enabling the village to contribute to meeting local housing need and providing a mix of new homes to address housing issues in the village itself. Others will collectively ensure that the distinctive character of the village will remain unharmed and improved through the reuse of redundant horticultural land. On the other hand, the assessment identifies the potential for some marginal negative landscape and biodiversity effects. But, having tested the alternative spatial options of Policy BCSI and the other 'no policy' options, none will lead to a better sustainability outcome than the proposed policies. In some cases, notably in respect of heritage and landscape effects, the alternatives assess less well.

13. In its Screening Opinion on the SEA, the District Council included an opinion on the need for an Appropriate Assessment under the Habitat Regulations Assessment. This concluded that the provisions of that plan would not have any significant effects on those nature conservation sites. However, as the ultimate provisions of the Neighbourhood Plan were not then known, it concluded that a separate Assessment may be required, noting the intentions of the Parish Council to allocate sites for housing, renewable energy and burial ground development.

14. The District Council has now re-screened the Submission version of the Neighbourhood Plan and has concluded that its provisions would not have any significant effects on those nature conservation sites and an Appropriate Assessment is not required.

I. INTRODUCTION

I.1 The purpose of this Sustainability Appraisal Report is to provide an assessment of any significant social, environmental and economic effects resulting from the policies and proposals of the Submission version of the Brightwell-cum-Sotwell Parish Neighbourhood Plan (“the Neighbourhood Plan”) in accordance with the Neighbourhood Planning (General) Regulations and the EU Directive 2001/42 on Strategic Environmental Assessment (SEA). Plan A below shows the designated Neighbourhood Area, which coincides with the parish boundary and comprises primarily the village of Brightwell cum Sotwell to the immediate west of Wallingford.



Plan A: The Designated Neighbourhood Area

I.2 The Neighbourhood Plan has been agreed for submission by the Qualifying Body, Brightwell-cum-Sotwell Parish Council (“the Parish Council”) to the local planning authority, South Oxfordshire District Council (“the District Council”), under the Neighbourhood Planning Regulations 2012. The District Council issued a screening opinion requiring an SEA and the Parish Council has chosen to meet this obligation by preparing a Sustainability Appraisal (SA) under the Environmental Assessment of Plans & Programmes Regulations 2004.

I.3 A Sustainability Appraisal is a systematic process used to ensure the social and economic objectives of a plan are achieved in addition to environmental considerations. For completeness, the Neighbourhood Plan has been subject to a combined process whereby the SEA has been incorporated with a Sustainability Appraisal (SA/SEA) to consider the wider social and economic effects.

I.4 A Scoping Report, (as part of Stage A of the process – see Figure B below) was consulted on for the minimum 5-week period during October and November 2014, in line with the Regulations. The comments received on the proposed scope of sustainability objectives were supportive – the objectives are set out in Section 6 of this Report. The

Parish Council consulted on a Pre Submission version of the Neighbourhood Plan for more than the statutory six-week process over November 2016 to January 2017. The Plan was informed by the Draft SA/SEA, as per Stage B of the process. The baseline evidence is contained in the separate Scoping Report.

I.5 The Draft SA/SEA report itself was consulted on, as per Stages C and D of the process. The comments made on both documents have been considered by the Parish Council in preparing the final version of the Plan and this SA SEA report for an independent examination prior to the referendum. The ongoing monitoring of the effects of implementing the plan (Stage E of the Process) is covered in Section 11 of this report.

I.6 The comments on the Draft SA SEA were generally supportive of the appraisal and its evidence base. Historic England advised that the evidence base is made clearer – the Historic Environment Record had been interrogated but this had not been referenced, which has now been done in the policies where relevant. It also commented on the wording of some site allocation policies, which has been addressed.

I.7 Natural England questioned the extent to which the SA SEA could conclude that some proposals would not have negative landscape and biodiversity effects. It also requires a biodiversity strategy that delivers a net gain to offset the loss on the site allocations. Much of its comment on landscape effects relates to the AONB, which has been addressed in this report. In respect of the offsetting of unavoidable biodiversity loss, it is noted that Policy CSBI of the Core Strategy sets out how a net gain may be achieved. The policies have been amended accordingly and the appraisal now addresses this below.

I.8 In its Screening Opinion on the SEA, the District Council included (in its Appendix 2) an opinion on the need for an Appropriate Assessment under the Habitat Regulations Assessment, as per Article 6(3) of the EU Habitats Directive. It noted that there are six Special Areas of Conservation (SAC) within or close to the District and that an Assessment had been carried out for the adopted Core Strategy. This concluded that the provisions of that plan would not have any significant effects on those nature conservation sites. However, as the ultimate provisions of the Neighbourhood Plan were not then known, it concluded that a separate Assessment may be required, noting the intentions of the Parish Council to allocate sites for housing, renewable energy and burial ground development.

I.9 The District Council has now re-screened the Submission version of the Neighbourhood Plan and has concluded that its provisions would not have any significant effects on those nature conservation sites and an Appropriate Assessment is not required. A copy of that opinion is attached to this report as Annex A.

I.10 The report provides an assessment of the Neighbourhood Plan objectives and policies and seeks to do it in a way that is proportionate to this task and that recognises the limitations of the available data and means of measuring direct impacts.

2. Background to Sustainability Appraisal

2.1 Through the SA/SEA the social, environmental and economic effects of the Neighbourhood Plan are tested to ensure that these promote Sustainable Development and the Plan avoids causing any significant environmental effects.

2.2 The combined process involves a simple evaluation of the social, economic and environmental impacts of the 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 environmental and the likely evaluation thereof without implementation of the plan
- The social, economic and environmental characteristics of areas likely to be significantly affected
- 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 preparations
- The likely significant effects on the local economy, society and the environment
- 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 (such as technical deficiencies or lack of know-how) encountered in compiling the required information
- A description of measures envisaged concerning monitoring

2.3 The methodology for the assessment is intended to be proportionate to the task of assessing the modest development proposals of a Neighbourhood Plan in a relatively small rural area. A summary of the process, as derived from the 2004 guidance is contained in Table I below:

Scoping	STAGE A: This stage sets the context of the assessment by identifying the baseline data
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	<p>and establishing the scope of the assessment.</p> <ol style="list-style-type: none"> 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 SA/SEA 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. 6. Consultation. 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	<p>STAGE 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.</p> <ol style="list-style-type: none"> 1. Finalisation of the Plan options and alternatives for testing 2. Testing the Plan Objectives against the SA/SEA Framework. The Plan Objectives are tested to ensure compliance sustainability principles 3. Evaluation of plan options and alternatives. The SA/SEA 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 beneficial effects. To ensure that all potential mitigation measures and measures for maximising beneficial effects that are identified. 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. <p>This is assessment is used to feed into the development of a plan or programme to help ensure the most sustainable option is selected. The SA/SEA framework is also used to access the sustainability implications of the draft policies and the results used to inform policy development.</p>
Reporting	<p>STAGE C: Preparation of the SA/SEA Report</p> <ul style="list-style-type: none"> • 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. <p>STAGE D: Consultation – seek representations from consultation bodies and the general public</p> <ul style="list-style-type: none"> • This is an ongoing process. Consultation of the draft SA/SEA Report is undertaken into account and used to influence further iterations of the sustainability appraisal process.
Adoption and Monitoring	<p>STAGE E: Monitoring</p> <p>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.</p>

Table A: The Combined SA SEA Process

2.4 Since the Scoping Stage A was completed, the focus has been on spatial strategy choice and policy formation. As discussed in Sections 8 and 9, the spatial strategy preferred by the

local community for growing the main village has been tested against four alternative spatial strategies using the SA/SEA framework. In all other policies, the framework has been used to compare them with a 'Policy Off' alternative.

3 Neighbourhood Plan Objectives & Other Programmes

3.1 The Neighbourhood Plan contains a number of policies for the use and development of the land in the Parish of Brightwell in the plan period up to 2032. These policies, together with the policies of the Local Plan and the National Planning Policy Framework (NPPF) will be used by the District Council to help determine planning applications once the Neighbourhood Plan is approved in due course. Although not yet adopted, the Neighbourhood Plan has been informed by the reasoning and evidence base of the emerging Local Plan.

3.2 The Vision for Brightwell cum Sotwell Parish is:

“To retain our separate identity as a rural parish set within open countryside, conserving the character of the various settlements; in a way that allows the community to evolve whilst sustaining our core vital services”

3.3 To achieve this vision a number of key objectives have been identified as follows:

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3.4 The National Planning Policy Framework (NPPF) published by the government in 2012 is an important guide in the preparation of local plans and neighbourhood plans. The BPNP must demonstrate that it is consistent with the provisions of the NPPF. The following paragraphs of the NPPF are especially relevant to the BPNP:

- Supporting a prosperous rural economy (paragraph 28)
- Good Design (paragraph 58)
- Protecting healthy communities (paragraph 70)
- Protecting local green spaces (paragraph 76)
- Conserving and enhancing the natural environment (paragraph 109)

- Conserving and enhancing the historic environment (paragraph 126)
- Neighbourhood planning (paragraph 185)

3.5 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 2032, which is expected to be adopted in late 2017 or early 2018, will replace the Core Strategy and older saved policies. The Neighbourhood Plan will also replace some non-strategic Local Plan policies as they relate specifically to this Parish. The Plan also includes minerals and waste plan documents adopted by Oxfordshire County Council.

3.6 Although the Plan will be tested for its general conformity with the strategic policies of the adopted Core Strategy and Local Plan, the imminence of the new Local Plan means the Parish Council is wise to consider the emerging policy direction and its reasoning and evidence.

3.7 The essence of the overall planning strategy for the District has been and will continue to be to focus development on the main towns and larger villages of the District and to maintain the rural character of the open countryside that makes up the majority of the area. The Parish does not lie within an area planned for growth and is currently considered a 'smaller village'.

3.8 The rural economic development strategy favours rural diversification, tourism development and home working, provided proposals respect the quality of their countryside location. There is no specific policy proposal in the new Local Plan to this effect but it is not expected the strategy will change, thus encouraging the Plan policies to promote appropriate proposals to support local jobs in the Parish.



Plan B: South Oxfordshire Local Plan 2032 Key Diagram

3.9 The affordable housing policy framework is well-established and is not likely to change in respect of the proportion of overall numbers required per scheme. However, national changes to affordable housing policy – most specifically the inclusion of Starter Homes in its definition – are likely to significantly alter the economics and therefore mix of tenure type that can be planned for through the local planning system.

3.10 More generally, the housing supply strategy of the Core Strategy is currently deemed out of date by §49 of the NPPF, given the District Council cannot demonstrate it has a five year supply of housing land, and this is unlikely to change until the new Local Plan is adopted. The new strategy proposes a significant increase in the pace and scale of housing development over the period to 2032.

3.11 The indication is that based on its range of local services and population, the village will be likely to require the Neighbourhood Plan to plan for at least 50 new homes over the plan period. The Core Strategy requires the mix of housing types on schemes to reflect local circumstances, which is expected to remain a requirement as this is consistent with the NPPF.

3.12 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 from these policies. 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 special landscape character. The policies will help inform site selection and other policies of the BPNP.

3.13 Although these policies now repeat national policy guidance (and so are therefore unlikely to be included in the new Local Plan in these forms), they reinforce the importance of proposals having full regard to heritage assets, whether formally designated or not. The Parish generally, and the village specifically, contains a significant number of listed buildings, as well as two Conservation Areas. Along with the local landscape character, these heritage assets have very much shaped the site selection and other policies of the Plan. It also defines the special character of the local Conservation Areas and raises the status of current supplementary guidance to carry the full weight of the development plan.

3.14 The policy framework contains a range of generic design and development management policies to be applied to all types of development proposal across the District. Again, there is the opportunity for the Plan to refine the framework so the guidance is specific to the Parish and carries greater weight in decision making.

3.15 The framework contains a variety of policies promoting the multi-functional benefits of green infrastructure assets. Such assets are especially important in defining the character and in the functioning of the village and wider Parish. In which case, the Plan provides an opportunity to bring forward specific proposals to protect and improve existing assets and to create new assets through development proposals.

4 Local Social, Environmental & Economic Issues

4.1 The main sustainability issues in the Parish to which the Neighbourhood Plan responds are outlined below:

- Affordability of all forms of housing within the Parish.
- Difficulty of moving house within the Parish.
- Little scope for downsizing.
- Modern developments have tended to reduce the rural feel of the Parish
- Difficult for new entrants to the market and for older residents to downsize
- Increasing traffic on the A4130 bisects the parish.
- There is increasing noise and light pollution.
- Developments risk affecting views to/from the AONB and causing visual coalescence with Wallingford.
- Some fields adjacent to the main settlement are owned by land banks and the edge of settlement is poorly defined
- Developments may increase risk of groundwater flooding or be subject to it
- Increased population will increase pressure on resources, possibly exacerbated by climate change
- Loss of gardens to infill and of traditional old orchards
- Brownfield sites often rich on wildlife
- Inappropriate development may cause significant detriment
- Inappropriate speed limits.
- Excessive on-street parking.
- Safety of cyclists and walkers
- Modern developments and subsequent loss of vegetation have tended to reduce the rural feel of the Parish

4.2 Without the Neighbourhood Plan, proposals for development in the Parish would be left to individual planning applications and opportunities to manage change positively and cumulatively may be lost. This would make little difference to controlling the environmental impacts of those proposals as they must in any event demonstrate they conform to development plan and the National Planning Policy Framework (NPPF) policy.

5 Environmental Characteristics

Introduction

5.1 Brightwell-cum-Sotwell is located in the County of Oxfordshire, and is 2.2 miles away from Wallingford and 3.6 miles from Didcot. The population of Brightwell-cum-Sotwell is currently 1,550.

5.2 The Parish covers 1,320 hectares and was formed by the merger in 1948 of Sotwell and Brightwell, including the Liberty of Clapcot. The hamlets at Mackney, Shillingford Hill and Sires Hill also fall within the parish, which has been part of South Oxfordshire District Council since the 1974 local government reorganisation when this part of Berkshire was transferred to the county of Oxfordshire.

History

5.3 The main village evolved from a number of small hamlets spread out along the spring line located on The Square, the Red Lion, the Priory Farm, Bakers Farm/Sotwell Manor and at Slade End. Over the centuries the 'gaps' in between have been developed; although this settlement pattern still predominated until after WWII. Several large Victorian properties are located on high ground north of the High Road.

5.4 Brightwell cum Sotwell was within living memory a predominantly rural community where agriculture dominated, with arable farming on the higher ground, grazing on the surrounding marshland and Thames floodplain and orchards around the settled areas. By the 1940s, the main village was still a mosaic of farmsteads, cottages and small manor houses, separated by orchards and smallholdings.

5.5 Between 1945 and 1990, two large building developments, Greenmere and Kings Orchard were constructed south of the High Road. Greenmere was planned as a model estate to house former agricultural workers who had previously lived in tied cottages across the village. The estates were separated from the historic core of the village by strip of field and orchard but linked by the footpath network.

5.6 During the 1970s and 80s; a private housing estate was constructed at Monks Mead. Elsewhere small clusters of family houses and bungalows appeared, typically one property deep. These flanked the lanes between the older properties, but preserved boundaries of historic enclosures. At Shillingford Hill the post WW II breakup of the Rush Court Estate led to the establishment of the residential Home Park site and former farm cottages becoming private homes. The estate house has become the Elizabeth Finn Trust home.

The Parish Today

5.7 The parish Facilities include The Churches (St. James and St. Agatha's), the Village School (and Pre-school), the village stores, post office, Red Lion pub, village hall and the Rec and Pavillion. Transport links include First Great Western Trains providing a fast link to Oxford, Reading and London from Didcot, while Cholsey has local stopping services. In terms of bus routes the X2 Wallingford-Didcot-Oxford service passes through the main settlement of Brightwell and Sotwell approximately hourly on weekdays and Saturdays.

5.8 There are two conservation areas – the largest covering most of the village of Brightwell-cum-Sotwell and the other covering Mackney. There are 50 listed buildings in the Parish, which is a relatively high concentration in a small area, and their prominence and cumulative effects play a very significant role in defining the character of the Parish.

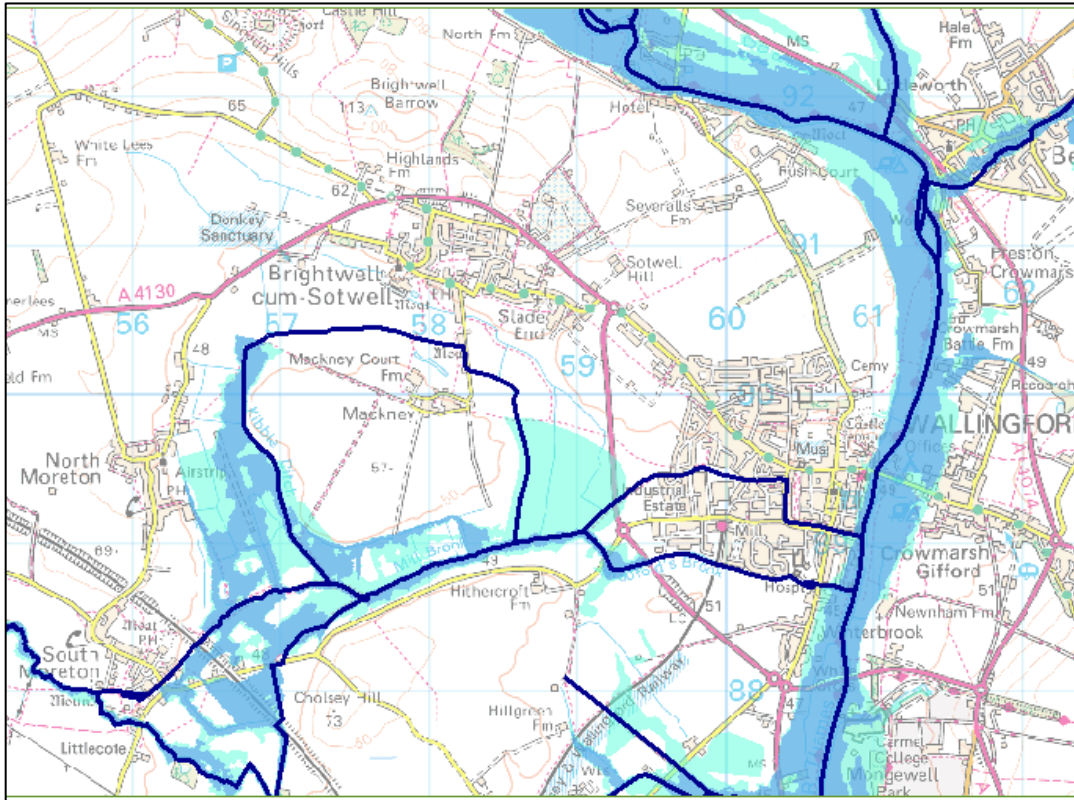
5.9 The Parish is set around the east-west ridge of the Sinodun Hills running from Wittenham Clumps across Brightwell Barrow towards Wallingford. To the south is a flat area of farmland and to the north, the River Thames forms the parish boundary as it meanders through its floodplain. A large part of the Parish lies within the North Wessex Downs Area of Outstanding Natural Beauty (AONB).

5.10 Sotwell and Brightwell are linear villages stretching 2km along the southern flank of the hills. The A4130 skirts the settlement on three sides but from every aspect views of the settlement are mainly of surrounding farmland, with only a few village buildings and mature trees showing. Even at the four entrances to the village off the A4130, the settlement blends so well into the landscape they could easily be missed.

5.11 The Parish is situated just west of the River Thames and is also surrounded by the Mill Brook and Kibble Ditch, which are both susceptible to flood risk and there is therefore land that falls within flood zones 2 and 3 (as shown on the Environment Agency mapping). The same mapping also shows there are some areas susceptible to surface water flooding in the Parish.

Selection of Environmental Data & Trends

- Cretaceous sediments laid down 50 million years ago, which were shaped during the last 2 million by moving ice and melt water as the rivers of the Upper Thames developed, are responsible for the present topography of the Parish. The ridge of Lower Chalk sloping east from Brightwell Barrow (113m AOD) is flanked on the north towards the Thames by areas of Gault Clay and on its south side by Upper Greensand and clays, sands and gravel of more recent deposits
- The soils reflect the underlying geology with heavy soils in the north of the Parish on the Clay and lighter ones on the alluvial deposits in the south
- The Upper Greensand, which makes up the bulk of Brightwell Barrow forms the aquifer feeding the springs at Brightwell and Sotwell, giving rise to the elongated spring line settlement dependent on this water resource. The Thames forms the northern boundary of the Parish: records from Days Weir give the average flow as about 30 cubic metres per second. The EA considers its quality to be good. Analysis of water samples from the springs show them to be slightly alkaline and low in phosphates. It is likely that as periods of drought and flood increase the period of time that the springs cease flowing will increase and that floodplain areas will be inundated with water with increasing frequency
- The north and west boundaries of the Parish are within the flood zones identified in the South Oxfordshire District Council and Vale of White Horse District Council Strategic Flood Risk Assessment (2009), see Figure 4, but this is in practice unlikely to prove relevant to the objectives of the Plan. More significant is the significant risk of groundwater and surface water flooding. Some areas of the main village and some fields in the low lying land to the south of the parish are likely to be at increasing risk from surface water and ground water flooding.

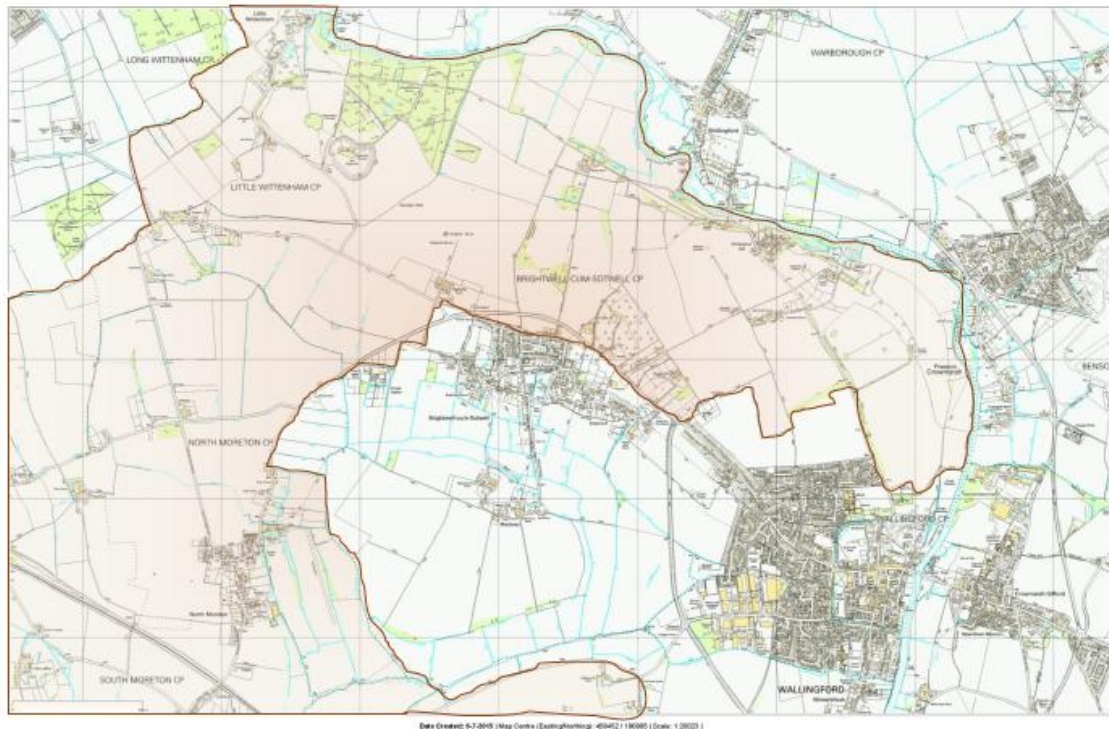


Plan C: Flood Risk Zones 2 & 3

- This is one of the driest parts of the country, while night temperatures in winter are often the lowest in England. Patches of mist and fog occur during the winter and there can be warm dry spells in the summer. Winter rainfall is normally more than sufficient to recharge the aquifer but following periods of prolonged heavy rain groundwater flooding occurs in Brightwell and farmland bordering the Millbrook in the south of the Parish can be flooded for several months with subsequent reductions in crop yields. Because evaporation is high during the summer flows in the streams and ditches can stop. It is likely that periods of flood and drought will increase. Measures to re-use water should be installed in new developments if possible and sustainable drainage system employed.
- Air quality is not sampled within the Parish but it is evident that the growing volume of traffic on the A4130 causes deterioration of air quality and it also raises noise levels in the village. Light pollution has increased significantly in recent years. Developments in Wallingford and Didcot are likely to increase levels of light pollution. It is anticipated that the traffic flow on the A4130 will increase.
- A survey of fruit trees and annual "apple days" have highlighted the importance of the remaining trees in gardens, hedgerows and orchards. A community orchard was planted in 2014. In addition the introduction of buffer strips and beetle banks and the planting of new hedgerow and coppices have recently slowed down the reduction in habitat in the open countryside. Hedgerow surveys have identified key hedges, the number of species they contain as well as their ages and physical characteristics. A garden bird survey carried out from 1996 to 2005 showed increases in certain species: for example red kites, buzzards, sparrow hawks and reductions in others, such as sparrows. A water course survey catalogued the number shape and form of

the ditches and streams and the wild life they contain. The amount of woodland in the Parish is below the average for the county: to help redress this the 2 hectare Millennium Wood was planted. It is providing a haven for wild life at the western end of the village. A moth survey conducted in 2013 revealed a healthy number of species, some 33 in total. There are a number of patches of Loddon Lillies along the bank of the Thames, but very importantly the Earth Trust, through its “River of Life Project” has recently established an extensive wetland at North Farm adjacent to the Thames on the northern edge of the Parish. Biodiversity within the settlements is likely to decrease unless positive steps are taken to protect it. Domestic hedges and front gardens continue to be lost and trees are felled and deadwood removed. Some of the areas with high biodiversity potential are the brownfield sites at the edge of the main village – sites that potentially could be developed. Measures to increase biodiversity are being deployed however, within the main village, by farmers and the Earth Trust through the River of Life project.

- Brightwell cum Sotwell is characterised by the mass of the Sinodun Hills that run east / west along the centre of the Parish. The hill tops dominate the landscape and can be seen for many miles around forming significant local landmarks.



Plan D: The AONB in the Parish

- To the north of the narrow ridge, the field system is more enclosed with patches of woodland and hedged fields. Pockets of willow carr and grazed meadows dominate the Thames floodplain. To the south large fields sweep down to a series of gravel terraces below an ancient and open landscape of regional landscape importance. It is along the southern terrace belt that the spring line and major settlements are located. To the south of the Parish, the (former) island of Mackney rises above flat meadows that until recently were marshes. Mixed farming dominates. A significant portion of the Parish is located in the northern tip of the North Wessex Downs Area of Outstanding Natural Beauty. The landscape represents a balance between the physical and human forces on the area. The intimate nature of the countryside,

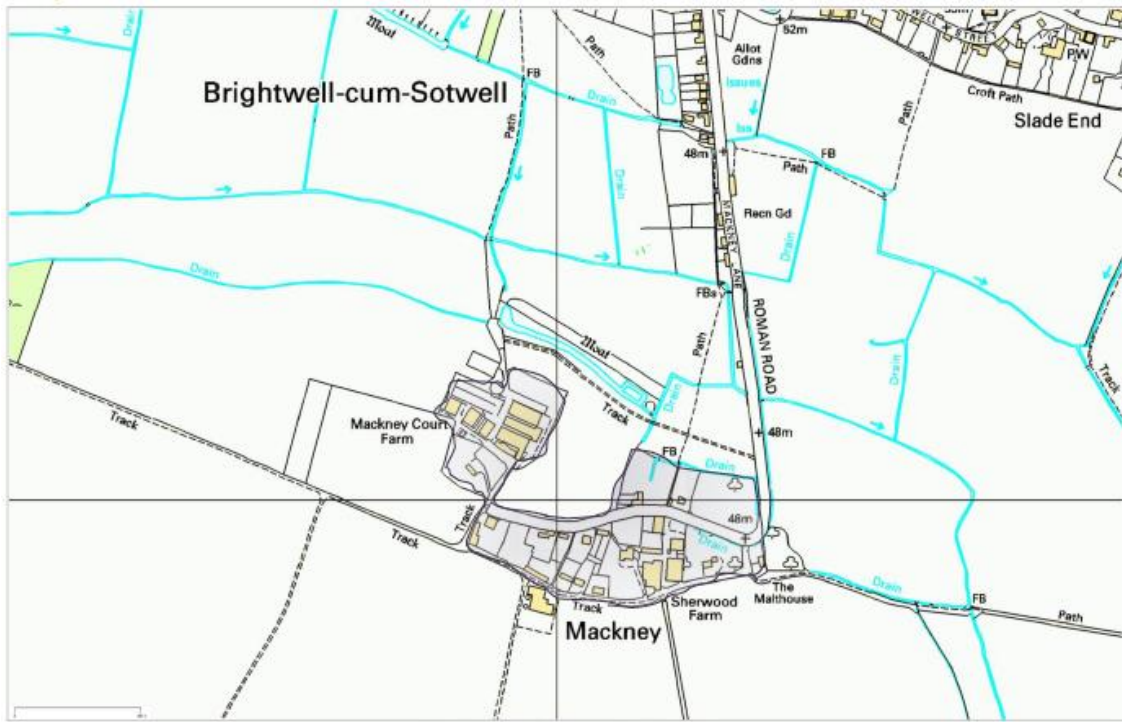
its variety and contrasts are the keys to its appeal. Much of the settlement nestles almost invisibly into the fold of the hills a feature that adds much to the area's rural character. The Parish is caught between an expanding Didcot to the west and a growing Wallingford immediately to the east. Pressures from these directions are shaping many aspects of the life of the Parish now and into the future. Under the SODC Core Strategy 555 new homes are designated for Wallingford Site B one field away from the eastern edge of the main settlement, to be built partly on land that formed part of the Parish until the boundary changes of 2015. Significant housing is anticipated at Didcot and to other settlements to the north. OCC has identified that the A4130 may need to be upgraded in the future to accommodate this development.

- The Parish has a number of material assets, including: primary school, places of worship, village shop, post office, village hall, recreation ground, sports facilities, allotments, pub and footpath network. As development increases, the role that the community assets have to a wider population will increase
- The Parish has been farmed for the last 4000 years and while the agricultural revolution and the enclosures some 200 years ago made a number of changes, intensification of agriculture over the last 60 years has brought about more significant alterations, especially to biodiversity. Loss of the orchards which surrounded the village until WWII has also been an important factor. Interest in making neglected orchards is gaining momentum. Community food growing schemes are increasingly common. New land uses are emerging such as the natural burial ground and solar energy farm.
- The present population of the Parish is approximately 1550, of which some 53% are female. Ethnically it is almost entirely white European. It has an abnormally high average age with more than 30% over 65 and less than 5% between 16 and 24. Once resident people tend to remain in the Parish for some time; 68% have been resident for more than 11 years. The parish's population has a significantly high proportion of older people. This is likely to remain constant. Younger people find it hard to stay in the parish and usually move on. The school population has decreased in numbers from 120 in the 1970s to around 80 at present with more children attending private schools.
- There are approximately 570 dwellings in the Parish, located in four principal settlements: Clapcot – 85 dwellings; Mackney – 15 dwellings; Sires Hill – 11 dwellings; and the main village - 459 dwellings. A number of dwellings has been built in the Parish over the past decade, some on new sites, some replacing existing buildings. The Parish is not required to build any new housing but the Community-led Parish Plan identified the need for between 10 – 20 additional properties over the next 20 years.
- The CLPP identified that BCS is a rural parish and wished to remain so. The winding tree lined lanes, views across open countryside and working farmland right the edge of the main settlements are all important elements in shaping this character. The CLPP identified the potential loss of rural character as the greatest threat to parish life. This is likely to increase as Didcot and Wallingford expand and new developments take place.
- The Parish has 78 recorded buildings and monuments including 1 grade I, 3 Grade II* 46 Grade II buildings, 1 Scheduled Ancient Monument and 6 SHINE sites (Selected Heritage Inventory for Natural England). There are two Conservation Areas. A key element of the main village's character are the narrow twisting lanes

often lined by trees, hedgerows or old brick / flint walls. Loss of trees and hedgerows is an issue. Long views across open countryside may be changed as Wallingford and Didcot expand. Parking along the lanes is an increasing issue. It is known that working farmland immediately adjacent to the main settlement is owned by developers.



Plan E: The Brightwell cum Sotwell Conservation Area



Plan F: The Mackney Conservation Area

Cumulative Effects

5.12 It is difficult to assess either the individual or cumulative effects of the Plan policies. Nearby Wallingford will continue to grow as one of the largest settlements in the District and the village of Benson to the north of the Parish is planned to grow by more than 400 homes in coming years. The scale of development planned for in this Neighbourhood Plan is very small by comparison.

6 Sustainability Objectives

6.1 To assess the sustainability performance of the Neighbourhood Plan, an assessment framework has been adopted, as shown in Table C below. The proposed framework was consulted upon with the statutory consultees as part of the SA/SEA Scoping Report.

Key Message from Policy Context	Sustainability Objective
Increase housing supply, especially affordable housing	<ul style="list-style-type: none"> To help provide existing and future residents with an opportunity to live in a decent home, by delivering at least 10 new homes within the plan period
Improve the quality and design of existing and new housing	<ul style="list-style-type: none"> New development to enhance the overall quality and character of the Parish and maintain a strong sense of place
Improve the mix of housing size and tenure	<ul style="list-style-type: none"> To help ensure suitable homes are available to all sectors of the community
Preservation and enhancement of the rural landscape and sense of place	<ul style="list-style-type: none"> To conserve the rural nature of the parish as a vital lung for all surrounding settlements. To protect and maintain the network of rights of way. To protect and maintain important views, including those out and to the main settlements.
Risk of Flooding	<ul style="list-style-type: none"> To ensure flood risk from all sources is managed effectively and sustainably
Risk of drought and water shortage	<ul style="list-style-type: none"> To support the protection, improvement and sustainable use of water resources
Threats to biodiversity and opportunities to enhance it	<ul style="list-style-type: none"> To conserve and enhance biodiversity
Heritage assets and the historic environment are irreplaceable resources	<ul style="list-style-type: none"> To conserve and enhance the Parish's built heritage for its historic significance and important contribution to local distinctiveness, character and sense of place
Increasing use of the road network within and through the Parish	<ul style="list-style-type: none"> To benefit the wellbeing of the community by the management of parking and traffic congestion encouraging walking and cycling
Enhance the setting of new housing and conservation of rural setting	<ul style="list-style-type: none"> To retain existing trees and hedgerows and design new landscaping to conserve and enhance the established character

Table C: Framework of Sustainability Objectives

6.2 The selection of objectives for the proposed framework reflects the general sustainability issues of the Parish and the policies in the Neighbourhood Plan. It has selected those objectives that are considered the most relevant information for this purpose. The decision not to choose any particular policy objective does not necessarily mean that the objective has no relevance to the Plan but that it is unlikely to enable the effects of policy options to be measured and is therefore unhelpful for this purpose.

6.3 The process of any housing site selections has been informed by an analysis of their suitability for development when assessed against the spatial policy of the Plan. That spatial policy, and the reasonable alternative spatial options, has been informed and tested by the SA/SEA framework.

7. Assessment of Neighbourhood Plan Objectives

7.1 A summary of the assessment of the six Neighbourhood Plan objectives against the ten SA/SEA objectives is provided in Table D below. A simple 'scoring' system is used to show positive (+), neutral (0) or negative (-) effects, or marginal effects (e.g. +/- or 0/-). Where the effect is dependent on an assumption, then a mix of those scores is used and an explanation is provided in the text below.

Neighbourhood Plan Objectives		Sustainability Objectives									
		Housing Supply	Design	Housing Mix	Landscape	Flooding	Water	Biodiversity	Heritage	Roads	Rural Character
1	Rural Character	0/-	+	0	+	0	0	+/0	+	+	+
2	Landscape Setting	0/-	+	0	+	0	0	+/0	+	0	0
3	Reuse of Land	+/0	+	0	+	0/-	0	0/-	+/-	0/-	+/-
4	Heritage	+/-	+	0	+/0	0	0	0	+	+/0	+/0
5	Facilities	+/0	0	+/0	0	0	0	0	+/0	+/0	0
6	Homes	+	0	+	0/-	0/-	0	0/-	+/-	+/-	+/-

Table D: Comparison of Neighbourhood Plan and Sustainability Objectives

7.2 Given the Neighbourhood Plan must contribute to the achievement of sustainable development to meet its basic conditions, and must win the support of the local community in due course, it is not surprising that there is a reasonably strong correlation between the two sets of objectives.

7.3 There is the potential for a number of positive effects in pursuing the Plan's objectives, especially in relation to securing high standards of design, protecting the landscape of the Parish and its heritage assets. The core Plan objective of maintaining the rural character of the Parish assesses particularly well against almost all the SA objectives.

7.4 However, positive effects are not a given, as there is the potential for some Plan objectives to have neutral or negative effects, if the policy choices and details are not addressed carefully. For example, the Plan objective of delivering homes to meet local needs has the potential for a range of negative effects, if homes are planned in the wrong locations in the Parish. Similarly, the Plan objective of reusing redundant agricultural and horticultural land in and around the village has the potential to have negative biodiversity, heritage and traffic effects if in the wrong location or if development is not properly planned for.

7.5 Conversely, the supply of new homes may help sustain the character of listed buildings and, if of the right type, may enable a change in the demographic profile of the main village to help sustain its community facilities, e.g. the primary school.

8. Assessment of Neighbourhood Plan Policies

8.1 The Neighbourhood Plan contains 17 policies, which have a series of social, environmental and/or economic impacts. Using the sustainability framework in Table D above, the assessment of each policy is summarised in Table E below. The assessment is of the proposed policies with their mitigation measures.

Neighbourhood Plan Policies		Sustainability Objectives									
		Housing Supply	Design	Housing Mix	Landscape	Flooding	Water	Biodiversity	Heritage	Roads	Rural Character
BCS1	Brightwell cum Sotwell Village Boundary	+	0	0	+	0	0	0/-	0	+	0
BCS2	Land at Bosley's Orchard	+	+	+	0/-	0	0	0/-	0	+	0
BCS3	Little Martins & Home Farm Barns	+	+	+	0	0	0	0/-	0	+	0
BCS4	Land at Thorne's Nursery	+	+	+	0	0	0	0/-	0	+	0
BCS5A	Slade End Farm	+	+	+	0/-	0	0	0/-	+	0	0
BCS5B	Strange's Nursery	+	+	+	0/-	0	0	0/-	+	0	0
BCS5C	Slade End South	+	+	+	0/-	0	0	0/-	+	0	0
BCS6	Local Gaps	0	0	0	+	0	0	+/0	0	0	+
BCS7	Landscape Character	0	+/0	0	+	0	0	+/0	+/0	0	+
BCS8	The Green Heart	0	0	0	+	0	0	+/0	0	0	+
BCS9	Design Principles	0	+	0	0	0	0	+/0	+	0	+

BCS10	Conservation Areas	0	+	0	0	0	0	0	+	0	+
BCS11	Local Green Spaces	0	0	0	+	0	0	+/0	+	0	+
BCS12	Trees, Hedgerows	0	+	0	+	0	0	+	0	0	+
BCS13	Footpaths	0	0	0	0	0	0	0	0	+	+
BCS14	Solar Energy	0	0	0	0	0	0	0	0	0	0
BCS15	Tourism Facility	0	0	0	0	0	0	0	0	0	0
BCS16	Natural Burial Ground	0	0	0	0	0	0	0	0	0	0
BCS17	Community Facilities	0	0	0	0	0	0	0	0	+	0

Table E: Comparison of Neighbourhood Plan Policies and Sustainability Objectives

Policy BCS1

8.2 By defining a new Village Boundary to contain new development to that which is planned, this policy establishes the principle of new development being focused on the main village, unless suited to a countryside location elsewhere in the Parish. It is the outcome of decisions made on the preferred spatial strategy and subsequent site allocations for growing the main village with housing development.

8.3 The preferred spatial strategy was derived from the vision and objectives and comprises land within the village envelope that:

- is entirely or partially enclosed within the existing settlement envelope to sustain the landscape setting to the village and to prevent any further elongation of the settlement or harm to the proposed 'Green Heart'; and
- allows for the development of small sites around the periphery of the village to avoid any further densification of the older parts of the village that will lead to traffic congestion and will compromise pedestrian safety in its narrow lanes

8.4 This strategy also provides opportunities to reuse land that has been previously used for agricultural or horticulture purposes but is no longer viable as such and can be brought back into beneficial use, especially if its redundant appearance detracts from the character of the Conservation Area. It may also create opportunities to deliver one or more direct community benefits.

Some locations may be especially suitable for smaller homes for first time buyers and young families that are within a reasonable walking distance of the primary school. Others may be especially suitable for downsizers that are within a reasonable walking distance of the village centre (i.e. the village shop/post office and village hall).

8.5 The spatial strategy is confined to planning for housing growth only. There is no indication that the new Local Plan will deviate from the adopted Core Strategy or the saved policies of the Local Plan in seeking to focus new employment and retail development on the main centres of population in the District. The villages are not well suited to extending their boundaries to accommodate that type of development and nor has there been any demand to do so. However, the policy presumes in favour of all types of development suited to a location within a settlement, provided they are located within the Village Boundary and are appropriate in other terms. No specific allocations are made as no landowners have requested that this be considered, but there may be reuse or infill opportunities as ‘windfall’ schemes in the future.

8.6 The combination of key spatial principles reflects the main tenets of national and local planning policy and of sustainable development and reflects the demands of the local community if the village is to grow successfully at this scale. The four alternatives to the preferred spatial strategy – all of which require the extension of the village into the landscape to the north, south, east or west – are assessed in the next section of the report. The methodology for defining and assessing the spatial options and sites is provided in the Site Assessments Report in the evidence base.

8.7 The Village Boundary defines the desired extent of the built up area of the main village by 2032 and, in doing so, it provides clarity for applicants and the planning authority alike on the distinction to be made between urban and rural when preparing and determining planning applications respectively. As such, it is merely a development management device shown on the Policies Map. The other, much smaller settlements of Mackney, Sires Hill and Shillingford Hill are considered too small and isolated to support new development and are therefore considered a part of the countryside.

8.8 The spatial strategy, of which this policy is an outcome, has a very positive housing supply effect, with the village boundary allowing for approx. 65 new homes to be delivered in the plan period, i.e. an increase of over 10% in the housing stock. And in consolidating new development within the main village form and not requiring further extensions into the landscape, the policy avoids any significant negative landscape effects on the AONB or other landscapes. It will also have a positive traffic effect, as the majority of development land lies close to the village centre. Similarly, the strategy has avoided negative heritage effects by defining the open land that makes up the setting to the Brightwell Conservation Area outside the village boundary (and proposing the designation of a Local Gap in Policy BCS6).

8.9 However, the strategy in effect is an intensification of the existing settlement, albeit in modest terms. Intensification may have the potential for ‘over-development’ or ‘town cramming’ if the overall quantum of development is too high and if unsuitable sites are selected, whose effects on the character and amenities of the settlement cannot be mitigated. As acknowledged in the appraisal of the proposed site allocations below, there are some inevitable residual negative effects with this preferred strategy, but those effects are minimal after mitigation and are outweighed by the positive effects of the strategy.

In the one case (Site 009, Elliot's Orchard), it is not considered possible to access the site or to satisfactorily mitigate its effects on the proposed 'Green Heart', and this site has not been allocated.

8.10 The District Council commented on the Draft Report that as it does not use a settlement boundary policy mechanism to distinguish between built up areas and the countryside that this appraisal should consider its sustainability merits separately. The primary purpose of this mechanism – which is a common policy device in other areas – is to ensure development remains plan-led by containing the incremental expansion of settlements. They bring clarity to those preparing and determining applications by defining where infill development and changes of use that would in principle be suited to a settlement, should lie within the edge of that settlement, and where it would be harmful to the countryside. Provided they are regularly reviewed and updated by the development plan, they are positive means to promote development, and should avoid a negative effect on housing supply. By preventing creep around settlement edges, the device has positive landscape effects, and will often have positive heritage and biodiversity effects where the edge coincides with the setting to a Conservation Area, as here.

Policies BCS 2 – BCS5

8.11 The site allocation policies are consistent with the preferred spatial strategy as described above and by definition, therefore, are located in the most sustainable locations. All the sites will therefore have positive housing supply and traffic effects and will avoid any significant negative landscape, heritage, flooding, water and rural character effects. They are distinctive sites so will offer a range of opportunities to deliver a mix of housing to meet local needs. However, none of the sites is entirely unencumbered and so each contains a series of key development principles to ensure their proper planning.

8.12 The views of Natural England on biodiversity offsetting have been considered. The development plan already makes provision for addressing biodiversity effects and delivering a net gain on sites where a loss is unavoidable. Each of the allocation policies affected has been modified to make references to this requirement for clarity. It is not considered necessary or practical to operate an offsetting scheme for this small Parish but the Parish Council has agreed to prioritise investment (through the Community Infrastructure Levy, planning obligations and other funding sources) in biodiversity improvement projects.

8.13 At Bosleys Orchard (BCS2), the policy avoids a significant negative biodiversity effect by requiring land is used to deliver a biodiversity gain in the wide landscape buffer adjoining the Style Acre footpath. There will remain a residual effect, which will be addressed through the biodiversity proposals described above. The site adjoins the boundary of the AONB to its north but the nature of the well-established and substantial tree and hedge planting on High Road do not allow the site to make any significant contribution to the enjoyment of the AONB in views from the site. There is therefore no negative landscape effect. A search of the HERS indicates no historic value on the site. It does not lie within the setting of the Conservation Area or a Listed Building, and therefore has a neutral heritage effect.

8.14 At Little Martins (BCS3), the policy avoids a negative biodiversity effect in a similar way and will avoid a significant negative landscape effect by requiring the bolstering of the existing landscape edge to the village. There will remain a residual effect, which will be addressed through the biodiversity proposals described above.

Although the site lies close to the AONB to its west and north, it does not adjoin it and there is no effective visual relationship between the two. The site is separated from the AONB to the north by a combination of housing development and a well-established and significant landscape edge on High Road. There is a similar landscape edge along the site boundary with Waterman's Lane, which contributes to effectively enclosing the site within the established village envelope on its western edge. There is therefore no negative landscape effect. A search of the HERS indicates no historic value on the site. It lies within the setting of the Conservation Area, but it allows no views to the Area that would play a significant part in defining its character. There are no proximate Listed Buildings. It therefore has a neutral heritage effect.

8.15 At Thornes Nursery (BCS4), the policy avoids a negative heritage effect by confining the scheme to no more than 4 homes and by requiring the design of the scheme has regard to the character of the Conservation Area and especially the limitations of Old Nursery Lane. The policy avoids a significant negative biodiversity effect as the net developable area will be small, thus avoiding the loss of scrub. There will remain a modest residual effect, which will be addressed through the biodiversity proposals described above. The policy will avoid a significant negative landscape effect by requiring the bolstering of the existing landscape edge to the village.

8.15 At Slade End Green (BCS5), the policy is intended to have a positive heritage effect in enhancing the character and appearance of the Conservation Area and the setting to a number of listed buildings by developing redundant and unsightly former agricultural and horticultural land. However, although the land reads as part of the cluster of buildings at Slade End (and was previously occupied by buildings), it is more exposed in views to the village from the south. The policy seeks to avoid a negative effect in this respect by requiring a landscape scheme for each of the three component sites, there is likely to be a small, residual negative effect. But, in requiring all three sites to come forward either as one application or at least as part of a masterplan, the policy will enable all the effects to be properly assessed in detail together.

Policies BCS6 – BCS13

8.16 These local gaps, landscape, heritage, design, green infrastructure and biodiversity policies aim to improve the management of development through the consideration of details that are specific to this Parish. Their effects are generally neutral but there are some positive effects, as they promote good design and respect for the local heritage (BCS9 and BCS10) and seek to conserve the rural character of the Parish (all the policies).

8.17 Given the Plan has a very positive housing supply effect as a result of its policies BCS1 – BCS5, the constraining nature of these policies on new development will not have negative effects, and still allow for small infill or redevelopment schemes of the right scale and design.

Policies BCS14 – BCS17

8.18 These business, employment, local facilities and services policies are all assessed as having neutral effects. There was the possibility of negative effects – for example in promoting renewable energy (BCS14) and tourism (BCS16) – but they are avoided with the careful wording of the policies to acknowledge this potential and to require proposals to have full regard to avoiding such effects.

As with Policy BCS17, the policies make no site-specific proposals. In which case it is not possible to provide a detailed assessment of their effects. In practice, their content is consistent with national and adopted development plan policies in these regards.

8.19 There is one positive traffic effect of Policy BCS15 in respect of the value of maintaining local services so the local community has less need to drive to other settlements for those purposes.

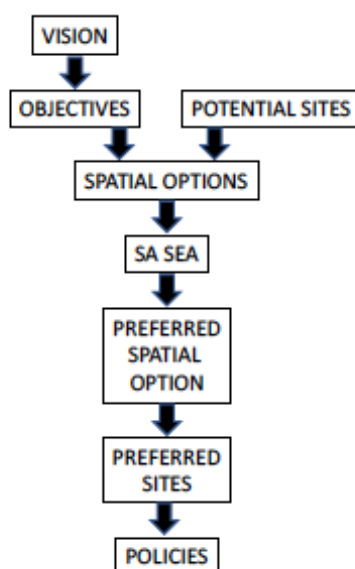
9. Assessment of Reasonable Policy Alternatives

9.1 The assessment is obliged to consider any reasonable alternatives to the proposed policies. In practice, the only alternative to all but one of the policies is that of having no policy and relying upon other development plan policies or national policy. The assessment therefore considers how such an alternative would make any difference to the sustainability outcomes.

9.2 Firstly, however, it assesses the alternatives to the preferred spatial strategy that defines Policy BCS1. The definition of the Brightwell Village Boundary in that policy is the outcome of the spatial strategy outlined in its supporting text. The boundary therefore accommodates a number of site allocations (in policies BCS2 – BCS5) that are consistent with that strategy.

9.3 The introduction to the Site Assessments Report explains in detail the relationship between it and the SA SEA appraisal methodology. For completeness, this explanation is repeated here to ensure the means by which sites have been appraised is understood. It is evident from comments received on the Pre Submission Plan documentation that it has not.

9.4 As neighbourhood plans cover much smaller areas than Strategic Housing Land Availability Assessments, they are able to consider a variety of spatial options for place making that is not possible for every Parish at the District scale. This allows for more emphasis to be placed on defining and comparing spatial options before considering the role that an individual site may play in delivering one or more of those options. The flow diagram below explains this further.



9.5 The visioning and objective work that formed the basis of early community engagement activity on the Plan – and its predecessor Community Led Parish Plan 2014 to 2024 – provided a clear preference for the spatial strategy that the Plan must adopt to growing the village in the future. Essentially, the strategy focuses on avoiding incursions into the surrounding landscape and distributing growth using a mix of different types of site, leveraging community benefits wherever possible and reasonable to do so.

9.6 At the same time, site assessments were undertaken by the neighbourhood planning team to ascertain the availability and simple capacity of land in and around the main village. Each site was identified as being part of one of five spatial options:

- Within the Village Envelope – defined as land contained within the observed settlement edge of the village
- West of the Village – defined as extending the village from its eastern boundary along Didcot Road to its west
- North of the Village – defined as extending the village from its northern boundary towards the by pass
- East of the Village – defined as extending the village from its eastern boundary towards Wallingford
- South of the Village – defined as extending the village from its southern boundary towards Mackney

9.7 The availability and capacity of the sites, drawn from the District Council's 'call for sites' exercises, indicated that each of these spatial options would comprise sufficient land to deliver a total quantum of housing development to meet the District Council's expectations in the emerging Local Plan. Of the other available sites, land that was beyond the main village was excluded at the outset of being contrary to a range of national and adopted Core Strategy policies.

9.8 These spatial options were tested during the preparation of the Draft SA SEA, with the first being identified as the preferred option and the others as Options A – D. Given the appraisal was of the spatial options, which contained all the relevant available sites, there was no need or value in appraising the individual sites. That exercise confirmed that the preferred option was most consistent with the framework of sustainability objectives when compared to the alternatives. As a result, the Pre Submission Plan proposed the four site allocation policies that were consistent with the preferred option. In addition, Policy BCSI of the Plan proposed to establish a new Village Boundary policy to contain growth to those sites and to suitable infill. Those sites that were located in one of the other spatial options were therefore not taken forward as site allocations as a) those options were not appraised as providing a more sustainable solution and b) there was no need to allocate any additional land.

9.9 All of the sites have been visited by the Neighbourhood Plan project team and their observations recorded. For each site, the observations relate to:

- its location in respect of the five spatial options
- its current/past use
- its location in relation to existing policy designations (e.g. Conservation Area),
- the nature of its surrounding land uses
- the legacy of any expressed community opinions on its development potential (either through the planning history of past development proposals or the engagement activities undertaken so far, most recently at the village event on 6 October 2016)
- the potential, by way of its location, to realise another reasonable community benefit as part of a scheme.

9.10 In addition to this technical appraisal, the community engagement work has given a clear indication that none of the alternatives would be supported by a clear majority of voters at the referendum in due course. The Judicial Review ruling in relation to the Tattenhall Neighbourhood Plan in May 2014 (EWHC 1470) stated:

“The consultation undertaken set the framework for deciding the reasonable alternative options for the policies in the Neighbourhood Development Plan and informed the decisions taken on what the draft policies would contain. Those options that had not commanded community support were not considered to be reasonable to take forward in the draft plan. Therefore, reasonable options were determined through the community consultation exercise (§67)”.

“In my view the level of consideration of alternatives in the sustainability assessment was sufficient to meet the requirements of the SEA Directive and the Regulations (§75)”.

9.11 This ruling has since been reaffirmed by the ruling on the St. Ives Neighbourhood Plan (EWHC 2817) of November 2016. However, although not defined as ‘reasonable’, the Parish Council has requested that the assessment looks at the technical attributes of the options to enable a comparison, should the examiner not consider that this ruling applies here.

9.12 Option A is based on a spatial strategy that grows the village beyond its western boundary on either side of Didcot Road. In the Site Assessments Report, this option includes sites coded as 001 (Martin’s Field) and 002 (Rectory Meadow). Option B is based on a spatial strategy that grows the village beyond its southern boundary, i.e. properties on Brightwell Street and down Mackney Lane. This option includes site 014 (The Haycroft). Option C is based on a spatial strategy that grows the village beyond its northern boundary between the A4112 and High Road and includes sites 005 (Triangle Piece), 006 (Green Hill), 007 (North of High Road), 011 (Sotwell Manor Fruit Farm) and 012 (Five and Half Acres). Option D is based on a spatial strategy that grows the village beyond its eastern boundary at Slade End to the Wallingford bypass and includes site 013 (Slade End Fields). All the sites that have been made available for assessment by the District Council for housing development lie within one of the spatial options.

9.13 In all options, there is sufficient land that has or may be made available for housing development to meet or exceed the requirements of the emerging Local Plan, hence each option is assessed as having the same positive effect on housing supply as the preferred option. Were any to be selected then the site allocation policies would enable the same approach to design management to be taken as the preferred option. Similarly, each may enable a mix of homes to be provided, though some land in Option C and all of Option D lie some distance from the village centre and may therefore not be as suitable for homes suited to older people.

Reasonable Alternatives to Neighbourhood Plan Policy BCS1	Sustainability Objectives									
	Housing Supply	Design	Housing Mix	Landscape	Flooding	Water	Biodiversity	Heritage	Roads	Rural Character
Option A (West of Village)	+	+	+	-	0	0	0	0/-	0	0
Option B (South of Village)	+	+	+	-	0/-	0	0	-	0/-	0
Option C (North of Village)	+	+	+/0	-	0	0	0	0	0	0
Option D (East of Village)	+	+	0/-	-	0	0	0	0	-	0

Table F: Comparison of Reasonable Alternative to Neighbourhood Plan Policy BCS1 and Sustainability Objectives

9.14 All the options are assessed as neutral in respect of the Flooding, Water Supply, Biodiversity and Rural Character objectives, as there are no known issues in those areas, though some land in Option C and Option D is prone to surface water flooding.

9.15 In terms of the Roads objective, Options A and C are assessed as neutral as they will allow for traffic movements to the local road network that will avoid adding traffic to the narrow village lanes. And both are reasonably close, for the most part in Option C, to the village centre to encourage walking to local facilities. Although also close to the village centre, Option B will generate traffic that will have to use the village lanes to access the local road network and may therefore have a marginal negative effect. At peak hours, this may lead to an increase in congestion on the lanes, though this may not be sufficient to lead to any major problems. Option D would be able to access the local road network, but as already noted, lies too far from the village centre to encourage non-car trips and so may have a clearer negative effect.

9.16 In heritage terms, options C and D are assessed as neutral as they do not lie within the setting of the Conservation Area or one or more Listed Buildings to cause any notable harm to those settings. Land in the southern area of Option A lies within the setting to the Conservation Area and listed St. Agatha's Church and Brightwell Manor. Although it may be possible to mitigate some of its impact, development in this location would likely obstruct views to those heritage assets, defined in the Appraisal as the two most important heritage assets in the village. Option B forms the setting to the Conservation Area and many listed buildings in views from Mackney. It is difficult to see how the development of land would be able to avoid harming the appreciation of the Area from this side of the village, and its effects are therefore assessed as negative.

9.17 Finally, all of the options lies beyond the observed settlement form of the village and would be regarded as extensions making incursions into the surrounding countryside. For Options A, C and D, these incursions would be into the setting of the adjoining AONB (and significantly within the AONB in Option C). It is not possible to see how the details of development in these locations would avoid some degree of harm to the appreciation of the AONB and the village location within its setting. In addition, it is doubtful that an exceptional circumstance could be justified for development within the AONB, when there are other options outside its boundary and setting. In which case, all these options are assessed as having negative effects. Option B lies within the defined gap of open land between the main village and Mackney, which contributes to maintain the visual integrity of each settlement and their separation as distinct areas. Development of any significant scale here risks undermining that essential landscape character and is also, therefore, assessed as having a negative effect.

9.18 It is important to stress that in many cases the contrast between the preferred option and its alternative options is not stark. In one case (Option A), the differences between the preferred strategy and the alternative is not significant, but the alternative does not present a more sustainable option. In the others, the differences are somewhat clearer and again, none present a more sustainable option than that chosen. But, the marginal, comparative benefits of the preferred option also coincide with community support. On that basis, it is possible to state that none of the alternative options is assessed as delivering a more sustainable outcome than the preferred spatial strategy. By definition, therefore, nor will the allocation of any land that has been made available for housing development in those alternative locations deliver a better outcome.

9.19 The alternative of not using a settlement boundary policy device here may be seen as offering greater flexibility by enabling applications to come forward for housing, employment and other development adjoining the observed village edge. This would have stronger housing supply benefits on the one hand, but the potential for negative landscape and heritage effects on the other. But, this is to miss the point of a plan-led system, where the device is used to contain the unnecessary sprawl of settlements. The flexibility of the device is in its support in principle of development proposals that are respectively necessary or suitable to a settlement or countryside location, with only their design and access attributes determining whether or not they should be consented. Not defining the boundary leaves this distinction ambiguous for applicants, planning authority and local community alike, with the pursuit of 'flexibility' putting at risk sustainable outcomes. Provided the development plan (most likely the Neighbourhood Plan from this point on) is reviewed and the boundary updated on a five year cycle, there should be no positive effects of this alternative that would outweigh the positive effects of using the device.

9.20 In respect of the 'Policy Off' alternatives to all the other policies, the assessment is neutral. In no case is it possible to discern any clear positive or negative effect of not having the policy. At the margins, it may be possible that a reliance on other development plan policy or the national planning policy framework may lead to decisions on planning applications that do not achieve as high a quality outcome, but this cannot be said with any more certainty than that. Aside from the site specific policies, all the development management type policies are caveated in one way or another to indicate that support for development principles is dependent on their adherence to other development plan policies.

10. Summary of the Assessment

10.1 The assessment indicates that the preferred policies of the Submission Plan have avoided leading to any significant, negative environment effects and will contribute, in overall terms, to achieving a sustainable pattern of growth and consolidation in the village.

10.2 This is no mean feat, given the scale of development that the Plan provides for, which far exceeds the scales of housing growth in the village of the last few decades. Crucially, the spatial strategy has found ways of infilling some of the edges of the village that retain its essential shape and character, without requiring incursions into the surrounding countryside. Its neutral effect in this regard contrasts with the negative effects of the reasonable alternative spatial options tested.

10.3 Not all the policies will have neutral effects. Some will have positive effects, especially in terms of enabling the village to contribute to meeting local housing need and providing a mix of new homes to address housing issues in the village itself. Others will collectively ensure that the distinctive character of the village will remain unharmed and improved through the reuse of redundant horticultural land. On the other hand, the assessment identifies the potential for some marginal negative landscape effects of the proposals at Slade End.

10.4 Having tested the alternative spatial strategies and the 'no policy' options, it does not seem likely that any of the alternatives will lead to a better sustainability outcome than the proposed policies. In some cases, notably in respect of heritage and landscape effects, the alternatives assess less well.

11. Monitoring

11.1 The Parish Council will monitor the progress in the implementation of the Neighbourhood Plan using the measures identified in Table C. The data for some of these measures is collected by the District Council in its planning monitoring reports. In other cases, the Parish Council will endeavour to collect data to report on the progress of the plan. It is likely the Council will choose to review the Neighbourhood Plan on a five yearly cycle and it will be informed by this monitoring activity in considering if and how to update the policies.

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Neighbourhood Plan

