

Memo HRA of South Oxfordshire Local Plan (Reg 19)
Neighbourhood Plans



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Title Technical note: Local Plan HRA progress to 5th September 2017

Project No 7161
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Date 5th September 2017

This technical note sets out the current status of the Local Plan Habitats Regulations Assessment (HRA) work, any issues that have been resolved since the Second Preferred Options (Regulation 18) consultation and those issues that are still outstanding.

Summary of HRA status

All aspects of the HRA have been concluded and no significant effects on European sites have been identified, with the exception of potential air pollution impacts. Conclusions on air pollution cannot yet be reached because we are awaiting traffic data from Atkins and responses from Natural England. There is still a risk that Natural England may require air quality assessment for one or more roads, which would impact upon the Local Plan timetable.

Issues relating to potential recreation impacts have been resolved since the Regulation 18 consultation, and all other issues were resolved prior to that. The HRA report is currently being updated to reflect changes to the Local Plan, responses to comments received during consultation, and to take into account any additional information available. Further explanation is provided below.

Air pollution

The previous draft of the HRA report was unable to conclude whether there would be potentially significant air pollution impacts as we lacked the traffic data necessary to screen impacts out. The HRA identified four European sites within 200m of a strategic road that are potentially sensitive to air pollution and for which traffic data is required: Aston Rowant SAC, Chiltern Beechwoods DAC, Windsor Great Park SAC, and Burnham Beeches SAC. In addition, Natural England suggested in response to the Regulation 18 consultation that Oxford Meadows SAC should also be screened in to the assessment of potential air pollution effects.

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We believe that Oxford Meadows SAC can be screened out as the site's qualifying (SAC) features are not particularly sensitive to airborne nitrogen and have prepared an explanation of this for Natural England's comment. Natural England has not yet commented on this approach but has referred instead to the use of traffic data to screen potential air pollution effects. We will continue to seek a full response but in the meantime have requested traffic data from Atkins for the roads adjacent to Oxford Meadows SAC.

Traffic data has been provided by Atkins for the road adjacent to Aston Rowant SAC, but is still outstanding for the roads adjacent to the other four sites. The data for Aston Rowant SAC shows that traffic from the Local Plan alone will not have a significant impact on air pollution, but could in combination with traffic from other plans or projects. We expect the data for other sites to show similar results, but cannot confirm until data is available.

Following the recent Wealden judgement, Natural England is in the process of revising its national guidance on how to assess the in-combination effects of more than one plan / project on air pollution. To date, the only guidance has been that increases in traffic flows of more than 1000 AADT from more than one plan / project should be considered to have a potentially significant effect. There is not yet any guidance on the appropriate approach in cases where the assessing authority contributes a very small proportion of an overall traffic increase.

It may be possible to obtain agreement that South Oxfordshire will not need to assess (and potentially agree mitigation for) any in-combination air pollution effects, where the contribution from the Local Plan is very small. This might include agreeing to cooperate with any Natural England-led development of mitigation for specific sites. However, there is a possibility that Natural England will either request air quality assessments for one or more sites, or withhold advice until the national guidance is published, sometime in September; both of which would have an impact on the Local Plan timetable. We will continue to attempt to conclude this and will keep South Oxfordshire District Council informed of any progress or delays.

Recreation

The previous version of the HRA report was unable to conclude whether housing development in proximity to Little Wittenham SAC would significantly increase visitor numbers to the site and therefore have an adverse effect on its integrity. Since then, the Earth Trust has provided visitor survey data that demonstrates that they have planned for much of the increase in local population that would arise as a result of the Local Plan. The Local Plan would produce some additional visits to the site, however Natural

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England has confirmed that they do not consider the site's qualifying features (great crested newts) to be particularly sensitive, and they understand that the site is being responsibly managed by the Earth Trust. The Earth Trust is currently updating its woodland management plan, which will include measures to protect habitats surrounding the great crested newt ponds. We are currently awaiting details of these measures but will refer to them in the HRA report, as recommended by Natural England. The HRA report is also currently being updated to reflect the minor changes in housing supply figures set out in the Local Plan revisions.

Following consultation on the previous draft of the HRA report, Berks, Bucks & Oxon Wildlife Trust (BBOWT) provided comments recommending that potential recreation impact on Aston Rowant SAC and Cothill Fen SAC should also be considered. We have since spoken to the Natural England officers for the sites, who do not believe that the sites are sensitive to increases in recreation pressure. We are satisfied that these sites can remain screened out and will explain our reasoning in the HRA report. As a courtesy, we have offered BBOWT the opportunity to provide additional information but have not yet had a response.

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