Oxford Station SPD

Strategic Environmental Assessment Screening Report
Regulation 9 (Screening) Environmental Assessment of Plans and Programmes Regs 2004

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OXFORD CITY COUNCIL

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1. Introduction

1.1 This report has been produced to determine the need for a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/EC and the Environmental Assessment of Plans and Programmes Regulations for the proposed Oxford Station Supplementary Planning Document (SPD).

1.2 The purpose of this document to undertake a screening assessment that meets the requirements of the European Legislation, applied in the UK through the Environmental Assessment of Plans and Programmes Regulations (SI No. 1633). The Regulations do not require an assessment of the planning merits of the proposals at this stage, instead the requirements is to ascertain whether or not a Strategic Environmental Assessment is required. This process is completely distinct from the planning process and governed by an entirely different set of Environmental Regulations.

1.3 The policy framework for the Oxford Station SPD is found in the Oxford Core Strategy (2011), and the West End Area Action Plan (2008).

1.4 The SPD will be subject to public consultation in accordance with the relevant regulations and the Council's Statement of Community Involvement.

2. Requirement for SEA

2.1 Previously all statutory land-use plans, including Supplementary Planning Documents, required a Sustainability Appraisal which incorporated the requirements for Strategic Environmental Assessment. This was a requirement under UK Government legislation. However, the 2008 Planning Act[1] and 2012 Regulations[2] removed the UK legislative requirement for the sustainability appraisal of Supplementary Planning Documents. Despite no longer requiring sustainability appraisal, SPDs may still require SEA.[3] CLG Guidance states:

"Supplementary planning documents do not require a sustainability appraisal but may in exceptional circumstances require a strategic environmental assessment if they are likely to have significant environmental effects that have not already been assessed during the preparation of the Local Plan."

[1] Planning Act 2008 – Paragraph 180(5d)
[2] Town and Country Planning (Local Planning) (England) Regulations 2012
[3] http://planningguidance.communities.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/sustainability-appraisal-requirements-for-local-plans/

2.2 The requirement for Strategic Environmental Assessment (SEA) is set out in the regulations[4]. There is also practical guidance on applying European Directive 2001/42/EC[5]. These documents have been used as the basis for this screening report. Regulation 5 sets out three types of plans that require SEA:

- The plan is for town and country planning and sets the development framework for future consent of projects listed in annexes I or II of the EIA Directive[6] (There is an exemption for a plan dealing with the use of a small area at a local level OR a minor modification of a plan[7]);
- The plan requires a Habitat Regulations Assessment
- The plan sets the future development consent framework that is not in the above two categories but has been determined to be likely to have significant environmental effects.

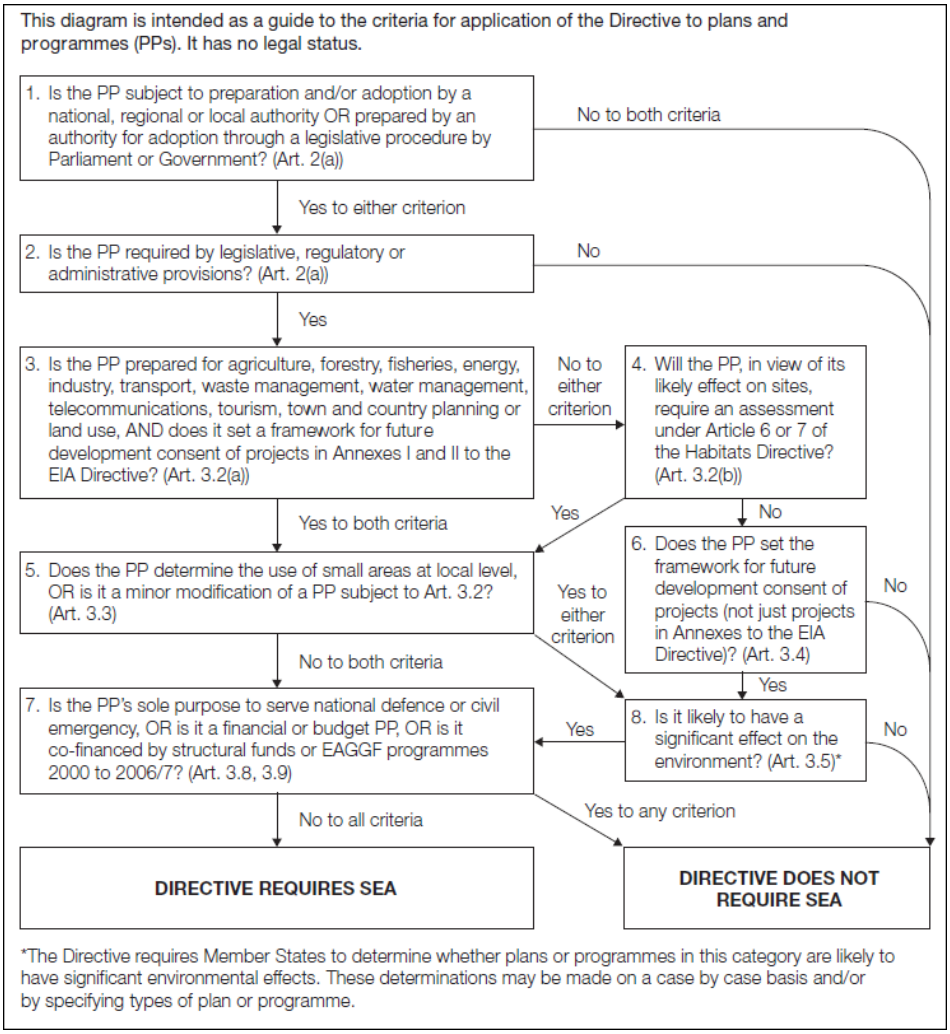
2.3 The proposed SPD will be for town and country planning and sets the development framework for future consent of a project within annex II of the EIA Directive. The relevant section of the EIA Directive is Annex II(10b) Urban development projects[8].

3. Screening

3.1 The ODPM practical guidance provides a checklist approach based on the SEA Regulations to help determine whether SEA is required. This guide has been used as the basis on which to assess the need for SEA as set out below. **Figure 1** overleaf[9] (taken from government guidance) illustrates the process that has been followed.

[4] Environmental Assessment of Plans and Programmes Regulations 2004 (no. 1633)
[5] A Practical Guide to the Strategic Environmental Assessment Directive
[6] Regulation 5(2) of the Environmental Assessment of Plans and Programmes Regulations 2004 (no. 1633)
[7] Regulation 5(6) of the Environmental Assessment of Plans and Programmes Regulations 2004 (no. 1633)
[8] Schedule II of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011
[9] Taken from: A Practical Guide to the Strategic Environmental Assessment Directive (2005), ODPM – page 13

Figure 1: Application of the SEA Directive to plans and programmes



3.2 **Table 1** below sets out the 8 questions identified in the diagram above and provides an answer with regard to the proposed Oxford Station SPD.

Table 1 – Application of the proposed SPD: Is an SEA required?

Establishing the need for SEA		**Answer**	**Reasons**	**Next step**
1	Is the SPD subject to preparation and/ or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Article 2(a))	Yes	The SPD is to be adopted by Oxford City Council	Proceed to question 2
2	Is the SPD required by legislative, regulatory or administrative provisions? (Article 2(a))	No		Proceed to question 3
3	Is the SPD prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management,	Yes	The SPD will be for town and country planning purposes and sets a framework for the	Proceed to question 4

Establishing the need for SEA		Answer	Reasons	Next step
	telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Article 3.2(a))		development consent of projects listed in Annexes I and II of the EIA Directive[10]	
4	Will the SPD, in view of its likely effect on sites, require an assessment under Article 6 or 7 of the Habitats Directive? (Article 3.2(b))	No	A Habitat Regulations Assessment Screening was undertaken to support the West End Area Action Plan. This concluded that there would be no significant impacts on the integrity of the Oxford Meadows SAC. See Appendix 2.	Proceed to question 5
5	Does the SPD determine the use of small areas at local level, OR is it a minor modification of a plan subject to Article 3.2? (Article 3.3)	No	The SPD determines the use of a small area but as it is the railway station, it is likely that this is of more than local significance.	Proceed to question 8
6	Does the SPD set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)? (Article 3.4)	Yes	The SPD sets the framework for future development consent of projects.	N/A
7	Is the SPD's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget plan, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Article 3.8, 3.9)	N/A	N/A	N/A
8	Is it likely to have a significant effect on the environment (Article 3.5)	No?	See Table 2 below for the detailed reasoning	

[10] The EIA Directive (85/337/EEC) as amended in 1997, 2003 and 2009

3.3 **Table 2** below sets out the criteria for determining the likely significance of effects on the environment taken from Schedule 1 of the Regulations[11] and applies them to the proposed Oxford Station SPD.

Table 2 – Criteria for determining the likely significance of effects on the environment

Criteria		**Oxford City Council's Assessment**
1 Characteristics of the plan or programme		
1a	The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources	The Oxford Station SPD will set the framework for the development of the Railway station site. The SPD will sit underneath the "parent" document – the West End Area Action Plan. In order to supplement the policies in the Plan, the SPD must reflect and be based on its policies. The railway station was indicated as a key site for redevelopment in the West End Area Action Plan, along with Frideswide Square in policy WE6. In fact there are several projects coming together including the redevelopment of both of these sites which warrant the joined up thinking that would be provided through the production of a Supplementary Planning Document. Primarily focused on design, the SPD will supplement the policy within the West End AAP. The objective of the SPD is to co-ordinate the forthcoming projects thus ensuring a high quality of infrastructure delivery which maximises benefits and value to all.
1b	The degree to which the plan or programme influences other plans and programmes including those in a hierarchy	The National Planning Policy Framework provides the following glossary definition of Supplementary Planning Documents: *Documents which add further detail to the policies in the Local Plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary Planning Documents are capable of being a material consideration in planning decisions but are not part of the development plan.* The objective of the SPD is to co-ordinate several schemes with the aim of ensuring a higher quality of development and infrastructure delivery which maximises the benefits to all. As such, and because of the focus on higher quality development, it is not anticipated that the Oxford Station SPD will add unnecessarily to the financial burdens of development. Instead it is intended to help applicants make successful application(s). This is in accordance with Paragraph 153 of the National Planning Policy Framework (NPPF). The SPD will have less material weight than the Core Strategy and the West End Area Action Plan. It will only be able to expand on existing policies and will not be able to introduce any new policies. The SPD will be at the bottom of the hierarchy and will have no impact on the content of those documents above it.

[11] Criteria taken from Schedule 1 of The Environmental Assessment of Plans and Programmes Regulations 2004

Criteria		Oxford City Council's Assessment
1c	The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.	The SPD will help with the delivery of plan policies and help meet with the City Council's objectives contained in the Core Strategy and West End Area Action Plan, both of which were developed to deliver sustainable development. It is intended to promote sustainable development by ensuring that development fulfils the economic, social and environmental dimensions as set out in the National Planning Policy Framework. Encouraging rail travel as an attractive sustainable mode of travel will help to encourage a modal shift away from the car.
1d	Environmental problems relevant to the plan or programme	The following environmental problems are associated with the area covered by the SPD. - Flood Risk - Cultural Heritage (views, Scheduled Ancient Monuments, listed buildings) - Potential for land contamination - Air Quality Each will be dealt with in turn. <u>Flood Risk:</u> A Strategic Flood Risk Assessment (SFRA) was undertaken to support the West End Area Action Plan in 2007 and updated as part of the review of the City-wide level 1 SFRA in February 2011. Although the West End AAP does not specifically allocate development sites within the West End Area, it notes that the land area needed for the likely redevelopment of the Oxford Station site is all within Flood Zone 1, however given its size – over 1ha – a site specific flood risk assessment would be required. It is expected that any flooding and flood risk issues would be dealt with at the application stage since the main sites indicated for development within the area (Becket Street Car Park and the Railway Station) both fall predominantly within Flood Zone 1. Appendix X shows the flood zone map for the West End which was updated as part of the city-wide SFRA in March 2011. It is worth noting that as the site falls predominantly within Flood Zone 1 then no alternatives need to be considered to help reducing flood risk. <u>Cultural Heritage:</u> There are several features of the historic environment which are of interest on and near the site. There are two Scheduled Ancient Monuments in the vicinity of the site. The first is the Swing Bridge to the north of the site and the second is in the gardens of the Said Business School. The site also lies within the City Centre Conservation Area and there is a Listed Building Close by in the form of the Church. It is envisaged that any potential impacts as a result of the development process would be picked up at the planning application stage. The role of the SPD is to co-ordinate

Criteria		Oxford City Council's Assessment
		several developments that will be coming forward, and add value in design terms. There existing policies within Oxford's Local Plan, and the SPD to ensure that these important aspects of the historic environment are protected (and enhanced) as part of any forthcoming development proposals. Potential for land contamination: As part of the site consists of former railway sidings there is the potential for land contamination. This should be investigated as part of the planning application process. Any contamination would either be removed or sealed in, and so the development is likely to have either a neutral or positive impact. Air Quality: The whole of the city centre is considered an Air Quality Management Area. Improving rail access by making enhancements to the station, in conjunction with other plans (e.g. proposed Seacourt park and ride expansion) are likely to reduce reliance on the private car (in the centre of Oxford) and as such improve air quality in the city.
1e	The relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).	There are unlikely to be significant impacts.
2 Characteristics of the effects of the area likely to be affected		
2a	The probability, duration, frequency and reversibility of effects	The Environmental Assessment of Plans and Programmes Regulations breaks down the environment into a series of constituent parts. These are as follows: biodiversity; population; human health; fauna; flora; soil; water; air; climatic factors; material assets; cultural heritage including architectural and archaeological heritage; landscape; and the inter-relationship between these issues. A Sustainability Appraisal was undertaken at the planning stage – the West End Area Action Plan. The West End Area Action Plan addressed the probability, duration, frequency and reversibility of effects. It is considered that the SPD does not add substantively to the policies in the AAP, but instead supplements them in order to co-ordinate forthcoming developments to ensure good design provide high quality infrastructure. Section 1d above provides an assessment of the likely impacts of the SPD. The impacts of the SPD in all the categories required for this assessment are likely to be neutral or positive.

Criteria		Oxford City Council's Assessment
2b	The cumulative nature of the effects	There are no likely cumulative impacts as a result of the production of the Oxford Station SPD. There is likely to be a positive cumulative impact due to projects such as the expansion of the Seacourt Park and Ride site. The Seacourt Park and Ride expansion is likely to reduce the number of vehicles entering the city centre and as such, the creation of a public transport hub at the station could have a positive impact on air quality.
2c	The trans-boundary nature of the effects	There will be no trans-boundary effects in the sense of between countries. On a more local level, trans-boundary effects with neighbouring authorities are unlikely to result in significant environmental effects beyond those identified in the SA of the West End Area Action Plan.
2d	The risks to human health or the environment (for example, due to accidents)	None identified.
2e	The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	The site area is over 1ha. The site area is above that which would be categorised as an "urban development project" in Schedule 10 of the EIA Regulations. An EIA would therefore need to be considered for this project. If an EIA was required for this project it would deal appropriately with any relevant site-specific socio-economic and environmental matters. The size of the current population of the area is small. Environmental Impacts have already been assessed as part of the Sustainability Appraisal for the West End Area Action Plan.
2f	The value and vulnerability of the area likely to be affected due to: i) Special natural characteristics or cultural heritage; or ii) Exceeded environmental quality standards or limit values; or iii) Intensive land-use	The SPD will supplement existing policies in the Core Strategy and West End Area Action Plan. It is envisaged that the SPD will firm up the types and quantum of development that will come forward as part of the Oxford Station redevelopment. i) Special natural characteristics are discussed in paragraph 3.5-6 (below). Cultural heritage is discussed at 1d (above). There are likely to be impacts of a significance which can be addressed without the need for SEA. ii) The SPD is not likely to exceed environmental quality standards or limit values. This is further described in paragraphs 3.5-6 on HRA (below). iii) The development is likely to intensify the land-use but currently the station site does not represent the best use of land for a prime city centre location.
2g	The effects on areas or landscapes which have a recognised national, Community or	None identified.

Criteria		Oxford City Council's Assessment
	international protection status.	

3.4 In order to work out whether or not an SEA would be required on the Oxford Station SPD, it was necessary to first review the Sustainability Appraisal for the West End Area Action Plan.

Table 3 reviews the Sustainability Appraisal of the Sites and Housing Plan in relation to the Oxford Station site.

SEA Directive Topics. (The environment is defined by Schedule 2 paragraph 6 of the Environmental Assessment of Plans and Programmes Regulations 2004)	Summary of previous SA findings or undertaken as part of the West End Area Action Plan.
Biodiversity/ Flora/ Fauna	The site is currently a brownfield site in the city centre with little known ecological value. As far as the impact on European Sites is concerned, the whole of the West End was subject to a Habitat Regulations Assessment screening which screened out the need for further assessment in relation to the Oxford Meadows SAC. As part of the SPD process there will be opportunities to improve biodiversity through appropriate green infrastructure. Any opportunities should be fully investigated through the SPD and planning application process and do not represent likely significant effects on the environment that would trigger the requirement for a Strategic Environmental Assessment (SEA).
Population	The West End AAP suggests that housing could be an appropriate use on the Becket Street Car Park. There will not be a significant increase in population over and above what was planned for in the Core Strategy as a result of production of this SPD.
Human Health	The site is within 800m of a GP surgery
Soil	The land is Previously Developed Land (PDL). It consists of various different buildings including the railway station and car park. There is the potential for contamination along the railway sidings. Any investigations will need to be considered as part of the planning application.
Water	A Strategic Flood Risk Assessment was carried out for the West End Area Action Plan. This suggested indicative uses for the various uses based on their flood zones. The Oxford Station SPD suggests appropriate uses for the site. The majority of the Station Site is in Flood Zone 1.
Air	The whole of the city area is classed as an Air Quality Management Area. The Oxford Station SPD would assist improvements in rail travel which would assist in increasing the modal shift to rail travel and away from the private car. This is likely to improve traffic flows and as such is likely to have a positive impact on air quality.
Climatic factors	Climatic factors were considered as part of the Core Strategy, and

	West End Area Action Plan. Any opportunities for renewable energy on ways to mitigate or adapt to climate change should be fully investigated through the SPD and planning application process and do not represent likely significant effects on the environment that would trigger the requirement for a Strategic Environmental Assessment (SEA).
Material Assets	The site is well served by public transport as it includes the railway station. The site is within 800m of a school.
Cultural Heritage, including architectural and archaeological heritage	The site lies within the City centre conservation area. There are two Scheduled Ancient Monuments in very close proximity to the site – the Swing Bridge to the north and Rewley Abbey. The site is also within the City Centre conservation area. There may also be impacts on views into and out of the site however these are protected by local policy designations. The West End Area Action Plan SA considered the impacts of development within the West End on cultural heritage. Any residual impacts should be dealt with satisfactorily at the planning application stage without triggering the need for an SEA of this SPD.
Landscape	The site does not lie within one of the city's view cones however it does sit within the "high buildings area". This is a local policy designation and as such would not trigger the requirement for an SEA.
Inter-relationships between the above issues	See above for inter-relationships.

HRA Screening Summary

3.5 A Habitat Regulations Assessment (HRA) Screening was carried out for the West End Area Action Plan. The HRA Screened out the strategic site of the West End Area for all impacts (HRA makes an assessment against the conservation objectives for the site to ensure that there will be no significant effect on the integrity of a European Site). The HRA Screening can be found at Appendix 2.

3.6 Given this HRA Screening, it is considered that no further HRA work is necessary to support the SPD.

4. Conclusions

4.1 The proposed Station SPD will supplement the existing policies set out in the West End AAP (See Appendix 1). The Station SPD will form part of the framework for the development of the site. It will sit underneath the "parent" document – the West End AAP. The Station SPD will become a material consideration when determining planning applications.

4.2 In order to supplement the policies in the West End Area Action Plan , the Oxford Station SPD must reflect and be based on any relevant policies within the Sites and Housing Plan.

4.3 To recap, therefore, Regulation 5 sets out three types of plans that require SEA:

- The plan is for town and country planning and sets the development framework for future consent of projects listed in annexes I or II of the EIA Directive[12] (There is an exemption for a plan dealing with the use of a small area at a local level OR a minor modification of a plan[13]);
- The plan requires a Habitat Regulations Assessment
- The plan sets the future development consent framework that is not in the above two categories but has been determined to be likely to have significant environmental effects.

4.4 Looking at each in turn, the site sets the development framework for future consent of projects listed an Annex II of the EIA Directive.

4.5 The Plan does not require a Habitat Regulations Assessment (see Appendix 2) and paragraphs 3.5-6 above.

4.6 Finally, the plan is not likely to have significant environmental effects – see table 2 for details.

4.7 It is not anticipated that the Station SPD will add unnecessarily to the financial burdens of development. Instead it is intended to help applicants make successful applications and provide a co-ordinated approach to infrastructure delivery. This is in accordance with Paragraph 153 of the National Planning Policy Framework (NPPF).

4.8 This Assessment therefore concludes that no Strategic Environmental Assessment of the Station SPD is required. In accordance with the SEA Regulations, the consultation bodies will be notified for their comments.

[12] Regulation 5(2) of the Environmental Assessment of Plans and Programmes Regulations 2004 (no. 1633)
[13] Regulation 5(6) of the Environmental Assessment of Plans and Programmes Regulations 2004 (no. 1633)

Appendix 1 – List of policies directly relevant to the Oxford Station SPD

Other relevant policies are included within the documents in Oxford's Local Plan. This includes the Core Strategy, the Sites and Housing Plan and the saved policies within the Adopted Local Plan 2001-2016.

West End Area Action Plan policies

Policy WE6

Frideswide Square and the railway station forecourt

Frideswide Square and the railway station forecourt will be improved to become more attractive, warming and better functioning spaces.

Planning permission will be granted for development that improves the capacity of the railway station as long as it is well designed, welcoming, easy to use and well connected to the existing station. It is essential that any development of the railway station improves it for passengers and creates a strong sense of arrival to Oxford.

Appendix 2: Habitat Regulations Assessment Screening: Correspondence with Natural England

Rebecca Tibbetts,
Natural England,
Foxhold House,
Crookham Common,
Thatcham,
Berkshire,
RG19 8EL

Planning Policy

01865 252718 or 01865 252163

planningpolicy@oxford.gov.uk

Please ask for: Sarah Harrison or Steve Pickles

12th January 2007

Dear Ms Tibbetts,

Appropriate Assessment of Oxford's West End Area Action Plan

The Planning Policy department at Oxford City Council is currently working on an Area Action Plan (AAP) for Oxford's West End. In case you are not aware, the West End is the southwest quarter of the City centre, bounded by Hythe Bridge Street, Oxpens Road, St. Aldates and the railway line. The area covered is shown on the attached plan. It is expected that 600 new units of residential accommodation will be developed in the area, as well as new student accommodation, new tourist facilities and some new offices. A key aim of the West End AAP will be to improve the public realm and green spaces in the area, offering enhanced recreational opportunities. You may have come across the preferred options document, but if not, information is available on our website at http://www.oxford.gov.uk/planning/west-end-aap.cfm. The draft Area Action Plan will be submitted for Examination to the Secretary of State in June.

The area covered by the West End Area Action Plan is at its closest point 800 metres from the southern edge of Port Meadow, which forms part of the Oxford Meadows Special Area of Conservation. For this reason the City Council has carried out a Screening of likely impacts on this European site, which is contained below, and which concludes that there is unlikely to be any significant impact and that an Appropriate Assessment is not therefore required. I would be grateful if you would let me know whether you agree with this conclusion.

Appropriate assessment of plans that could affect Special Areas of Conservation (SAC's) for habitats (SACs) is required by article 6 (3) of the European Habitats Directive, which states:

'*Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect theron, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.'*

The Habitats Directive applies the precautionary principle to SACs. Plans and projects can only be permitted if it can be shown that they will have no significant adverse effect on the integrity of the site in question. They may still be permitted if there are no alternatives to them and there are imperative reasons of overriding public interest as to why they should go ahead. In such cases, compensation will be necessary to ensure the overall integrity of the site network.

Relevant European Sites

Figure 1 shows the location of the area covered by the West End Area Action Plan and the nearest European sites. There are three SACs within 15 kilometres of the area covered by the West End Area Action Plan. These are:

- Oxford Meadows: which is located 800 metres away at the closest point;
- Cothill Fen: which is located 7 kilometres away;
- Little Wittenham: which is located 15 kilometres away.

It is considered that the West End Area Action Plan could not have an adverse impact on either Cothill Fen or Little Wittenham. Cothill Fen is an alkaline fen dependent on a high water table and calcareous, base-rich water supply. As Cothill Fen is in the catchment of the River Ock which is a different catchment, it could not have an adverse impact on this site. Little Wittenham has been designated because it contains two ponds with large populations of great crested newts. As development in Oxford's West End will not affect the habitat in the ponds or the newts foraging habitat around them, the West End Area Action Plan could not have an adverse impact on this site. These two sites have therefore been excluded from further assessment in this screening exercise.

Oxford Meadows: Qualifying features and Environmental Requirements

The citation for the Oxford Meadows SAC states that:

'Oxford Meadows includes vegetation communities that are perhaps unique in reflecting the influence of long-term grazing and hay-cutting on lowland hay meadows. The site has benefited from the survival of traditional management, which has been undertaken for several centuries, and so exhibits good conservation of structure and function. Port Meadow is the largest of only three known sites in the UK for creeping marshwort *Apium repens*.

Qualifying habitats: The site is designated under article 4 (4) of the Directive 992/43/EEC) as it hosts the following habitats listed in Annex I:

- Lowland hay meadows (*Alopecurus pratensis, Sanguisorba officinalis*)

Qualifying species: The site is designated under article 4 (4) of the Directive (92/43/EEC) as it hosts the following species listed in Annex II:

- Creeping marshwort *Apium repens.*

Environmental Requirements

The following key environmental requirements to support the SAC's integrity were identified at an appropriate assessment screening workshop carried out for the South East Plan:

1. Maintenance of traditional hay cut and light aftermath grazing.
2. Absence of direct fertilisation.
3. Minimal air pollution.
4. Absence of nutrient enrichment of waters; good water quality.
5. Balanced hydrological regime – alteration to adjacent rivers may alter flooding regime and reduce botanical diversity.

A further workshop on appropriate assessment for the Oxford Core Strategy was held on the 20th October 2006 at which the additional issue of ensuring that recreational pressures are maintained at a reasonable level was also raised as an issue.

Possible Impacts of the West End Area Action Plan (AAP)

A34 goes through the SAC

Table 1. Likely impacts of AAP on environmental requirements of Oxford Meadows

Environmental Requirement of Oxford Meadows	**Likely impact of AAP**	**Likely risk to site integrity**
1. Maintenance of traditional hay cut and light aftermath grazing.	None – related to activities directly at the site, which AAP will not affect.	No
2. Absence of direct fertilisation.		
3. Minimal air pollution	Additional development in the West End may increase traffic movements into Oxford. However, the area is very sustainably located with excellent public transport links as the railway station and Gloucester Green Bus Station are located within the area covered by the AAP. The area is also readily accessible from other parts of Oxford by walking and cycling and the AAP proposes to improve these links. There will be very limited residential and commercial parking and no increase in public parking, with the intention of helping to ensure car use is not increased. Given the large number of vehicles which travel along the A34 the impact on pollution levels deriving from this source of increased traffic from the West End is considered to be imperceptible.	Little or no impact.
4. Absence of nutrient enrichment of waters: good water quality.	Although relatively close to the Oxford Meadows, Oxford's West End is downstream of the site, so any pollution of surface water run	Little or no impact.

	off could not affect the Oxford Meadows. Sewage treatment will be dealt with at Sandford Sewage Treatment Works, which is located just outside Oxford on its southern boundary, downstream of the SAC.	
5. Balanced hydrological regime	Water to serve development in the West End would come from Farmoor reservoir, which derives its water from the Thames. There is the potential for water abstraction from the Thames to affect the hydrology of Oxford Meadows. Water levels in the Thames have not dropped enough to affect the meadows since the drought of 1976, but climate change and increased water abstraction could potentially lead to this in the future. However, use of water for development of the West End would be a tiny proportion of the total extracted from the Thames and in itself is not likely to have a significant impact. The West End AAP Preferred Options Document states that 'to cater for development in the West End, alternative flood-plain capacity may be needed. It could be provided within the West End, or may be more appropriately located outside the area, further upstream.' If the compensation was provided upstream it is possible that the works could affect the hydrology of Port Meadow.	Unlikely to be significant impact in terms of water abstraction. If flood compensation is provided upstream of the West End, it will be important to ensure that appropriate mitigation measures are included to prevent it having an adverse impact on the hydrology of the Oxford Meadows. Flood compensation is currently being investigated as part of a SFRA of the West End.
6. Balanced use for recreational pressures	Public consultation carried out by Scott Wilson as part of their 'Oxford City Green Space Study' revealed that people are willing to walk approximately 1,900 metres to important green spaces and 750 metres to neighbourhood sites. As the West End is 800 metres from the southern end of Port Meadow it is likely that some people will use this area of the SAC for recreational purposes. Extensive public use is already made of Port Meadow for informal recreation without an adverse impact on *Apium repens*, the species for which it has been designated a SAC. This species is not particularly sensitive to trampling and also thrives in the wettest areas, where there is least recreational pressure for most of the year. The remaining areas of the SAC are at least 3,500 metres away beyond Port Meadow, and it is considered that recreational use of these areas is unlikely to increase significantly as a result of implementation of the West End AAP. A key aim of the West End development will be to improve the public realm and green spaces	Unlikely to be significant

	in the area, offering enhanced recreational opportunities. Key of these will be the creation of a linear park along Castle Mill Stream, improvements to Oxpens Field and to the path along the Thames. Amenity space and play areas to serve the new residential development will also be required. It is expected therefore that many recreational needs will be met within the West End, which will reduce the pressure on Port Meadow. There are also already extensive alternative areas of green space that residents of the West End would be able to use including Grandpont Nature Park; Christchurch Meadows; the University Parks; Oxpens recreation ground; the Thames path long distance trail and the canal towpath.	

Possible 'in combination' impacts

Table 2 shows other plans, programmes and underlying trends, which could affect the environmental requirements of Oxford Meadows and lead to 'in combination' impacts.

Table 2. Likely 'in combination' impacts on environmental requirements of Oxford Meadows

Environmental requirements of Oxford Meadows	Likely Impact of Other Plans, projects and Trends	Likely 'in combination' risk to site integrity
1. Maintenance of traditional hay cut and light aftermath grazing. 2. Absence of direct fertilisation.	The A34 goes through the Oxford Meadows Special Area of Conservation. Improvements/widening to the A34 could potentially have a significant impact on the SAC through land take. The draft South East Plan states that 'Premium bus routes with frequent, high quality services will also be needed to link the country towns to Oxford, supported by bus priority measures and remote park and ride. There is also a need for improved rail services on the A34 corridor, particularly as this is unlikely to be widened and the government is considering demand management measures. East West Rail is crucial to linking the sub-region to Milton Keynes and supporting development at Bicester. So is enhanced capacity at Oxford station (linked to essential resignalling work), if this busy rail corridor is to cope with growth in passenger and freight traffic in the face of limited capacity on A34.' The importance of these measures is further emphasised by the report in the Oxford Times on 15th December 2006 that 'experts at the Highways Agency predict that by 2026 the A34, between the M40 and Didcot, will become one of the most congested roads in the South-East….the A34 is already operating above capacity and … Oxford city, the only major hub in the region, attracts more than 22,000 car based commuters from the outlying districts every day.'	By taking the opportunity to make more efficient use of the land near the station/bus stations, the West End Area Action Plan will help to reduce pressure on the A34. However, it also represents a unique opportunity to secure improved rail and bus facilities in central Oxford, which are likely to be key in avoiding the need for further widening of the A34.

<table>
<tr>
<td>3. Minimal air pollution</td>
<td>The table below shows where air pollution levels at Oxford Meadows in 1999/2000 exceeded the site's critical load. Pollution loads were within the critical load for acid deposition, ammonia, nitrogen deposition and SO2, but near capacity for ozone. Compared to most other European sites in the South East region, Oxford Meadows is relatively unaffected by pollution. Air pollutant levels in the South East are expected to go down until about 2010 – 2015 due to improving technology (particularly for cars), after which they are likely to rise again.

<table>
<tr><th>pollutant</th><th>deposition / critical load</th></tr>
<tr><td>acid deposition</td><td>0.433</td></tr>
<tr><td>ammonia</td><td>0.163</td></tr>
<tr><td>N deposition</td><td>0.772</td></tr>
<tr><td>NOx</td><td>0.99</td></tr>
<tr><td>ozone</td><td>1.26</td></tr>
<tr><td>SO2</td><td>0.18</td></tr>
</table>

Source: http://www.apis.ac.uk,

Note: The critical air pollutant loads that a given site can accommodate depends on the type of site. In this case, Oxford Meadow has been assumed to be unimproved hay meadow.

Key: deposition / critical load

<table>
<tr><td><0.25</td><td>0.25-0.74</td><td>0.75-0.99</td><td>1-1.24</td><td>1.25-1.99</td><td>2+</td></tr>
</table>

Development of 47,200 new homes in Oxfordshire as proposed in policy H1 of the draft South East Plan and 80,000 new homes and 2 million square metres of new business floorspace in South Hampshire is likely to increase traffic levels on the A34 and cause reduced air quality.</td>
<td>Air pollution is likely to worsen at the Oxford Meadows site due to increased traffic levels, particularly on the A34. The West End AAP proposes very limited residential and commercial parking and no increase in public parking, with the intention of helping to ensure car use is not increased. It is unlikely therefore to significantly contribute to these increased pollution levels.</td>
</tr>
<tr>
<td>4. Absence of nutrient enrichment of waters; good water quality</td>
<td>As the area covered by the West End AAP is downstream of the Oxford Meadows, it will not adversely impact on nutrient enrichment or water quality in combination with other plans.</td>
<td>Little or no impact.</td>
</tr>
<tr>
<td>5. Balanced</td>
<td>Development in Oxfordshire and Gloucestershire,</td>
<td>Natural England has</td>
</tr>
</table>

hydrological regime	including that in the West End, that uses water from the River Thames catchment upstream of Oxford Meadows could affect the hydrology of the meadows. Gravel extraction to meet the increased primary aggregate targets (South East Plan Policy M3) could affect the hydrology of the site. The Environment Agency's flood alleviation scheme for Oxford, which is likely to consist of enlargement of existing watercourses and/or creating flood relief channels, may affect the flooding regime of the River Thames.	stipulated that a key requirement of the Oxford flood relief scheme is that it does not have an adverse impact on the Oxford Meadows hydrological regime. Similarly it is important that other plans that could impact on it are also subject to appropriate assessment, but their impact is beyond the scope of this assessment. Given the scale of water abstraction from the Thames and the relatively small scale of development in the West End it is not considered likely that it would cause a perceptible effect on the hydrological regime of the Oxford Meadows, in combination with other plans.
6. Balanced use for recreational pressures	There has been extensive development in the Oxford canal corridor in recent years, but this is now largely complete. Few other sites have been allocated for residential development within 1,900 metres of the SAC in the 'Oxford Local Plan 2001 –2016', though Wolvercote Paper Mill has been allocated for a mix of employment and employment generating uses. Further residential development within this zone could also occur if the Safeguarded Land at Peartree was allocated for residential use in the Oxford Core Strategy. However, while this covers 16 hectares, it is more likely to be developed for employment uses, which is the current preferred option in the Core Strategy. There are few other opportunities for residential development in north Oxford owing to the extensive area of the Oxford flood plain, while access from the existing residential areas of north Oxford is limited by the severance created by the main Oxford to Birmingham railway line.	Unlikely to be significant

Suggested Avoidance Measures

Widening of the A34

There are currently no proposals by the Highways Agency to widen the A34. The road through Oxford is, however, already at capacity and forecasted to become through Oxford one of the most congested roads in the south east. While the development proposed in the West End Area Action Plan is unlikely to have a significant impact on traffic levels on the A34 and the issue of whether in the long term widening is more likely, it does provide a unique opportunity to improve public transport facilities in central Oxford, and thereby reduce the likelihood of such a widening to become necessary.

Ensure that the West End Area Action Plan makes provision for improving rail and bus transport facilities in the West End and does not increase public parking, with very limited residential and commercial parking so as to encourage residents, with the intention of ensuring that car use is not increased.

Air pollution

The Environment Agency's advice[14] on traffic related pollution is that it needs to be considered if a road carrying a significant proportion of new traffic related to the plan runs within 200 metres of a European site. In the case of the West End Area Action Plan, this will generate some new traffic that will pass along the A34 through the Oxford Meadows SAC. No precise information is available on the volumes of traffic involved. However, it is likely to be very small in terms of the overall levels of traffic along the road. The West End is also located in a very sustainable location, in transport terms, probably more so than almost any other location in Oxfordshire given its location in the centre of Oxford, in an area which includes the railway station and the Gloucester Green Bus Station. Given that large numbers of people commute into Oxford the provision of 600 homes in the heart of Oxford is likely to help reduce commuting in contrast to development in other places close to the A34 that are further away from Oxford, such as Bicester and Didcot. The West End Area Action Plan also provides the opportunity to improve rail and bus facilities in Oxford, thus encouraging more people to travel by public transport and to further limit public and private parking. Therefore it is considered that provided the West End Action Plan does incorporate measures to promote public transport use and limit travel by car, it will not significantly increase traffic along the A34 and exacerbate pollution levels in the vicinity of the Oxford Meadows SAC.

Recommend that further information is obtained from the highway authority on whether there is likely to be an increase in traffic generation along the A34 arising from development in the West End Area Action Plan and to ensure that the submission document includes measures designed to improve the use of public transport by improvements to the railway station; bus terminals and by restricting public and private parking in the West End.

Water quality

As development in the West End is downstream of the Oxford Meadows it is considered that it will not lead to any deterioration in water quality on the Oxford Meadows.

Hydrological Regime

The City Council has adopted a Natural Resource Impact Analysis Supplementary Planning Document (NRIA SPD). This requires new developments to look at the issue of minimising the use of water resources, and encourages new developments to look at measures such as water-saving devices; rainwater collection/harvesting and grey water recycling. The preferred target is to achieve a 30% reduction of average

[14] English Nature (16 May 2006) letter to Runnymeade Borough Council, 'Conservation (Natural Habitats&c.) Regulations 1994, Runnymeade Borough Council Local Development Framework

water use. Given also the scale of development is small scale compared to the extent of development in other areas of the Thames catchment, it is considered that the impact on the Oxford Meadows hydrological regime would be insignificant. As these measures are already in the NRIA SPD, no further action is required.

Recreational Pressures

The impact on the Oxford Meadows SAC is unlikely to be significant as there are other areas of green space closer at hand that can also be used. A key aim of the West End development will be to improve the public realm and green spaces in the area, offering enhanced recreational opportunities. Key of these will be the creation of a linear park along Castle Mill Stream, improvements to Oxpens Field and to the path along the Thames. Amenity space and play areas to serve the new residential development will also be required. It is expected therefore that many recreational needs will be met within the West End.

While the recreational impact from development in the West End on the Oxford Meadows SAC is unlikely to be significant, the West End AAP will ensure that new recreational provision is made within the area which will help to encourage people to also use other areas for recreational purposes and thereby reduce recreational pressure.

In conclusion, our own screening of the likely impacts of development of the West End on the Oxford Meadows Special Area of Conservation has indicated that there are unlikely to be any significant impacts and that an Appropriate Assessment is therefore not required. I would be grateful if you would consider this issue and let me know whether you agree with this conclusion.

Yours sincerely,

Sarah Harrison

Senior Planning Officer

Appendix 3: West End Area Action Plan Flood Map (2011)