

Strategic Environmental Assessment (SEA) of the Windsor Neighbourhood Plan

Environmental Report
Non-technical Summary

November 2018

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Introduction

AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Windsor Neighbourhood Plan (WNP).

The WNP is being prepared in the context of the Windsor and Maidenhead Borough Plan, and specifically will seek to supplement the strategic policies of the Local Plan with detailed policies and proposals to address local place-based issues.

SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising the positives. SEA of the WNP is a legal requirement (following the plan having been ‘screened-in’ by the Borough Council).

The Neighbourhood Plan is at an advanced stage of preparation, with the ‘pre-submission’ version now having been prepared for consultation, under Regulation 14 of the Neighbourhood Planning Regulations.

An Environmental Report Update is published for consultation alongside the plan at the current time, with a view to informing the consultation. This is a Non-technical Summary (NTS) of the Environmental Report.

Structure of the Environmental Report / this NTS

SEA reporting essentially involves answering the following questions in turn:

1. What has plan-making / SEA involved **up to this point**?
 - i.e. preceding finalisation of proposals for consultation.
2. What are the SEA findings **at this current stage**?
 - i.e. in relation to the proposals for consultation.
3. What are the **next steps**?

Each of these questions is answered in turn below. Firstly though there is a need to set the scene further by answering the question ‘What’s the scope of the SEA?’

What’s the scope of the SEA?

The scope of the SEA is reflected in a list of topics and objectives. Taken together, this list indicates the parameters of SEA, and provides a methodological ‘framework’ for assessment.

The SEA framework

Topic	Objectives
Air quality	Improve air quality in the Neighbourhood Plan area
Biodiversity	Protect and enhance all biodiversity and geological features.
Climate change mitigation	Reduce the level of contribution to climate change made by activities within the Neighbourhood Plan area.
Climate change adaptation	Support the resilience of the Neighbourhood Plan area to the potential effects of climate change, including flooding.
Historic environment	Protect, maintain and enhance the cultural heritage resource, including the historic environment and archaeological assets.
Landscape	Protect and enhance the character and quality of landscapes and townscapes.

Topic	Objectives
Land, soil and water	Ensure the efficient and effective use of land.
	Promote sustainable waste management solutions (reduction, re-use, recycling).
	Use and manage water resources in a sustainable manner.
Community	Cater for existing and future residents’ needs as well as the needs of different groups in the community, and improve access to high-quality community services and facilities.
	Reduce deprivation and promote a more inclusive and self-contained community
	Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures
Health/wellbeing	Improve the health and wellbeing residents within the Neighbourhood Plan area
Transport	Promote sustainable transport use and reduce the need to travel

PLAN-MAKING / SEA UP TO THIS POINT

An important element of the required SEA process involves assessing ‘reasonable alternatives’ in time to inform development of the draft proposals, and then publishing information on reasonable alternatives for consultation alongside the draft proposals.

As such, Part 1 of the Environmental Report Update explains how work was undertaken to develop and assess a ‘reasonable’ range of alternative approaches to addressing one of the key policy issues at the heart of the plan, and the policy issue identified (see Chapter 5 of the main report) as being associated with a clear strategic choice, namely Windsor Racecourse.

Specifically, the following alternatives were identified and assessed, in relation to Windsor Racecourse -

- 1) Support re-configuration of the entrance to improve flow of traffic, maintenance of the green boundary and continued investment in principle
- 2) A policy *additionally* supporting limited intensification of uses.
 - At the marina this could mean development on previously developed land to improve the use of the waterfront with publicly accessible facilities, as per past plan proposals.
 - At the racecourse this might mean support for applications for modest schemes that follow-on from the recently approved 150 bedroom hotel.¹

Alternatives assessment findings are presented within the table below. Within each row (i.e. for each of the topics that comprise the SA framework) the columns to the right hand side seek to both categorise the performance of each option in terms of ‘significant effects’ (using **red** / **green**) and also rank the alternatives in relative order of performance.

¹ Planning application 16/03035/FULL (see <http://publicaccess.rbwm.gov.uk/online-applications/applicationDetails.do?keyVal=OE7UL8NI0CV00&activeTab=summary>).

Alternatives assessment findings

Objectives	Option 1 More restrictive policy	Option 2 Policy with caveated support for limited development
Air quality	=	=
Biodiversity	=	=
Climate change mitigation	=	=
Climate change adaptation	★ 1	2
Historic environment	=	=
Landscape	★ 1	2
Land, soil and water resources	=	=
Community	2	★ 1
Health and wellbeing	2	★ 1
Transport	=	=

Commentary

- *Air quality* - air quality is an issue at the Racecourse entrance, with the Windsor Air Quality Management Area (AqMA; designated due to levels of NO₂ resulting from car traffic) a short distance to the east. Both options would include policy focused on improving traffic flow at the entrance; however, there are not likely to be notable air quality implications. Option 2 could potentially be supportive of additional parking and/or a Park and Ride facility on the site;² however, there is no certainty. As such, the alternatives are judged to perform broadly on a par, and significant effects are not predicted.
- *Biodiversity* - the Thames Corridor as a whole plays an important role in respect of supporting biodiversity; however, there are limited areas of particular biodiversity importance on the site. As such, the alternatives are judged to perform broadly on a par, and significant effects are not predicted.
- *Climate change mitigation* - the alternatives do not have any discernable implications for per capita greenhouse gas emissions from the built environment or from transport. As such, the alternatives are judged to perform broadly on a par, and significant effects are not predicted.
- *Climate change adaptation* - the great majority of the area - indeed the whole area other than the grassed area at the entrance to the site (used as a car park on event days) - falls within flood risk zone 3, i.e. an area of highest flood risk. This is an argument against any intensification of uses at the marina or racecourse (Option 2); however, significant negative effects are not predicted, noting that the recent planning permission for a 150 bed hotel identified good potential to mitigate risk through design.
- *Historic environment* - there are no listed buildings or other designated features within the site, nor is there considered to be any discernable potential to impact upon off-site heritage assets. As such, the alternatives are judged to perform broadly on a par, and significant effects are not predicted.
- *Landscape* - this is a key issue for the site. Whilst the marina and racecourse are well set back from the A308 (Maidenhead Road), and well screened from this direction, there are elevated views of the site from the A355 (Slough Road), with emerging WNP policy VIE.01 identifying this as a 'key view' to be protected.

² RBWM's 2009 Parking strategy includes a P&R at the site; and the BLP Infrastructure Plan mentions 'Windsor Park and Ride'. A 400 space facility was consented in 2014, but not implemented, with the application now having lapsed.

Objectives	Option 1 More restrictive policy	Option 2 Policy with caveated support for limited development
<p>There are also views from Thames Path, on the opposite side of the river. Finally, there is a need to consider that this area falls within the London Metropolitan Green Belt, and likely does contribute to more than one of the stated Green Belt purposes. These are arguments against any intensification of uses at the marina or racecourse (Option 2), and indeed it is appropriate to ‘flag’ the risk of significant negative effects, noting the concerns that have been raised by RBWM.</p> <ul style="list-style-type: none"> - <i>Land, soil and water resources</i> - the site is likely to comprise ‘best and most versatile’ agricultural land; however, as the site is not in agricultural use or likely to be returned to agricultural use, this is a non-issue. It is difficult to identify other potential issues. As such, the alternatives are judged to perform broadly on a par, and significant effects are not predicted. - <i>Community</i> - the racecourse is a major tourist attraction, and the marina is also a valued facility. The racecourse holds up to two events per week outside of winter, with the likelihood of increased operations, following the recent granting of planning permission for a 150 bed hotel. There are traffic issues at the entrance, and at nearby junctions, on racedays, with impacts particularly felt by nearby residents, and the proposal under both alternatives would be support road/junction upgrades to help address these issues. Assuming that traffic issues can be addressed, some limited intensification of uses at racecourse, in particular (Option 2), could be supportive of economic objectives for Windsor as a tourist destination, and so Option 2 is judged to perform well. However, significant positive effects are not predicted, as any intensification would likely be of limited scale. - <i>Health and wellbeing</i> - there are currently no footpaths through the site, meaning that this is a large part of the Thames Corridor that is quite inaccessible. In comparison, land to the north of the river (Dorney, Eton Wick and Eton) is highly accessible, with extensive footpaths and common land. The possibility of new public rights of way has been mooted, but no detailed proposals examined, and there is seemingly no potential to connect with the wider footpath network, short of a new bridge. There is, however, the potential to increase access to the marina as a leisure destination, including for local residents of Dedworth, and on this basis alone it is appropriate to highlight Option 2 as performing relatively well. Significant positive effects are not predicted, given the wide ranging nature of health determinants. - <i>Transport</i> - as per the discussion above, under ‘air quality, the alternatives are judged to perform broadly on a par, and significant effects are not predicted. <p>Overall conclusion</p> <p>There could be socio-economic benefit to support for limited intensification of uses at the racecourse and/or marina (Option 2), potentially felt both by local residents (who might benefit from increased access to the Marina) and at the scale of Windsor as a town (recognising the economic importance of the racecourse. However, this is a sensitive area in landscape/Green Belt terms, and within the functional flood plain, and so a more conservative policy approach (Option 1) could be appropriate.</p> <p>It is ultimately the role of the plan-makers, working with the local authority, to balance competing issues/objectives, and arrive at a preferred option (see discussion below, within Section 7).</p>		

The Forum responded to the alternatives assessment findings as follows -

“The preferred option is Option 1, which can be described (in summary) as: “Support re-configuration of the racecourse entrance to improve flow of traffic, maintenance of the green boundary and continued investment in principle”. A previous version of the plan additionally made reference to caveated support for limited redevelopment of previously developed land at the racecourse marina, with a view to increasing use of the waterfront; however, RBWM objected on Green Belt grounds.

With regards to the racecourse itself, the recent granting of planning permission for a 150 home hotel means that the situation is in something of a state of flux. As such, it is appropriate for the neighbourhood plan policy to focus on the specific matters of improving the traffic situation at the junction with Maidenhead Road, and maintaining the green buffer to Maidenhead Road. Furthermore, any support for additional development, or intensification of uses, could fall on Green Belt grounds. The group recognises the importance of the racecourse to the economy of Windsor, and anticipates that economic objectives will be suitably realised following implementation of the hotel development.”

ASSESSMENT FINDINGS AT THIS STAGE

Part 2 of the Environmental Report presents an Assessment of the Pre-submission Plan. Assessment findings are presented as a series of narratives under the 'SEA framework' headings.

The following overall conclusion is reached -

In conclusion, the appraisal finds that the WNP will lead to positive effects in terms of a wide range of sustainability objectives, with very limited tensions (between policies and sustainability objectives) highlighted. Positive effects are described as 'notable' in terms of several objectives, including 'biodiversity', 'community' and 'landscape', but it is only in terms of 'historic environment' that the conclusion is reached that positive effects will be 'significant'.

Next steps

Part 3 of the Environmental Report answers– *What happens next?*

Plan finalisation

Subsequent to consultation under Regulation 14, **Regulation 15**, of the Neighbourhood Planning Regulations, requires that the Group submit (to the Local Authority) the 'Proposed' Plan and a 'Consultation Statement'. The Consultation Statement must describe issues or concerns raised through the current consultation and how these were addressed when preparing the 'Proposed Plan' for submission.

Regulation 16 then requires that the Local Authority 'publicise' the Proposed Plan so that stakeholders can make representations that may then be considered at Examination. It will be appropriate for the Local Authority to also publicise an updated version of the Environmental Report, with a view to informing representations.

Regulation 17 then requires that the Local Authority submits (to the person appointed to carry out the Examination) the Proposed Plan and a copy of any representations which have been made in accordance with Regulation 16. It may be appropriate for the Local Authority to also submit the updated Environmental Report, with a view to informing the Examination.

Regulations 18 and 19 require that, subsequent to the Examination, the Local Authority publishes the Examiner's Report and a Decision Statement. The Decision Statement sets out whether or not the Local Authority is prepared to 'make' (i.e. adopt) the plan. If the Local Authority is prepared to make the plan, then a referendum can be held. It may be appropriate for the Local Authority to also publish an updated Environmental Report, with a view to informing the Referendum.

Regulation 20 states what the Local Authority must do when the plan is 'made' (i.e. adopted). The SEA Statement must be published alongside the made Plan, with a view to providing:

- information on the decision, i.e. an explanation of why the final plan approach was decided-upon in light of SEA and consultation; and
- measures decided concerning monitoring.

Monitoring

At the current time, there is a need to present 'measures envisaged concerning monitoring'.

The WNP includes a section on 'Implementation and delivery', where it is stated that -

"A WNP Delivery group will be formed that will meet at least annually when the Infrastructure Delivery Plan is renewed to agree delivery using Community Infrastructure Levy funds, as well as monitor the progress of the plan using the monitoring indicators below."

The WNP then goes on to list a series of indicators, which are considered broadly appropriate from an 'SEA perspective', i.e. in light of the appraisal presented above, in Section 9.