



Strategic Environmental Assessment for the Hexham Neighbourhood Plan

Environmental Report to accompany the
submission version of the Neighbourhood Plan

Second Addendum

October 2019

Revision History

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NON TECHNICAL SUMMARY

An addendum to the Environmental Report has been prepared to deal with the following matters:

- The methodology for determining effects with regards to the historic environment
- To update the discussion relating to plan alternatives

In response to these issues, a detailed heritage assessment has been undertaken for each of the reasonable site options. The findings can be summarised as follows:

- A handful of sites do not give rise to any issues due to the absence of historic features.
- Most sites have some historic value / features, but these have been affected negatively already. Development therefore provides the opportunity for enhancement provided that the remaining valuable features are protected and design is sympathetic.
- There are no significant heritage reasons why any of the site options could not be taken forward as a site allocation.

The addendum also sets out an updated assessment of the Plan (i.e. the individual and cumulative effects of the proposed site allocations). The overall conclusions are the same as those identified in the initial Environmental Report. These are as follows:

- Positive effects on the historic environment are likely as redevelopment of sites should help to better reveal the significance of heritage assets and remove poorly designed development.
- Minor negative effects could occur should there be a loss of locally important buildings associated with site development. However, the accompanying site policies seek to avoid this.

With regards to reasonable alternatives, the updated discussion concludes that no further strategic alternatives need to be appraised in the SEA.

No mitigation or enhancement measures have been identified at this latest stage of the SEA.

It is not necessary to include additional monitoring measures as the conclusions of the assessment remain the same as within the Environmental Report (which already contains an appropriate monitoring framework).

1. Introduction

- 1.1 The Hexham Neighbourhood Plan (HNP) has been prepared as a Neighbourhood Development Plan under the Localism Act 2011. The Neighbourhood Plan area, which includes the administrative area of Hexham Parish, is being prepared in the context of the saved policies of the Tynedale District Wide Local Plan (April 2000) and the Tynedale LDF Core Strategy (October 2007). The Plan will also have due regard to the emerging Northumberland Local Plan.
- 1.2 This document is the second addendum to the Strategic Environmental Assessment (SEA) Environmental Report which accompanied the HNP for Regulation 14 consultation in October 2018.
- 1.3 The Plan (and the Environmental Report) was submitted to Northumberland County Council in February 2018, and subsequently, underwent independent Examination.
- 1.4 One of the key issues arising from the Examination related to representations made by Historic England in relation to the SEA process. This second addendum has been prepared to address these issues.

2. This Environmental Report Addendum

- 2.1 The Neighbourhood Plan is being developed alongside a process of SEA, a legally required process that aims to ensure that the significant effects of a draft plan (and alternatives) are systematically considered and communicated. It is a requirement that SEA is undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations (the 'SEA Regulations') 2004.
- 2.2 The primary aim of this Environmental Report Addendum is to address issues raised by Historic England in relation to the assessment of site options in the SEA.
- 2.3 In addition, the County Council consider it to be useful to provide a wider discussion of the process that was undertaken to determine what reasonable alternatives exist (for achieving the each objective of the Plan).
- 2.4 There is established case law / practice that states that any 'deficiencies' in the SEA process can be rectified, and the preparation of a report addendum is an appropriate way of achieving this.
- 2.5 The addendum therefore covers the following factors:
 - Updated assessment of heritage assessment criteria for reasonable site options
 - Updated appraisal of the proposed site allocations in the draft Plan
 - Additional description of the alternatives consideration process (for clarity)

3. Scoping

- 3.1 The scoping information as set out in the Scoping Report and main Environmental Report remains valid and has been used to inform the assessments in this addendum.

4. Site assessment updates

Introduction

- 4.1 As part of the SEA for the Hexham Neighbourhood Plan, a high-level assessment of heritage constraints was undertaken for each of the site options identified as reasonable alternatives. This information was presented in the Environmental Reports that accompanied the Regulation 14 version and the Submission versions of the Neighbourhood Plan.
- 4.2 In response to representations made by Historic England (that was identified as a key issue for discussion by the Independent Examiner), a more detailed study into heritage issues and impacts was commissioned by Hexham Town Council.
- 4.3 An independent heritage consultant has undertaken a detailed assessment of the historic environment in Hexham. Primarily, this has identified the heritage issues associated with each site option and the likely impacts of development (and potential for mitigation and enhancement).
- 4.4 The findings of this study have been summarised below, and form the basis of the updates to the SEA findings (as presented in this Addendum).

Re-assessing site options

- 4.5 The Heritage Impact Assessment sets out a robust methodology for assessing impacts that identifies and takes account of the significance value of heritage assets when determining the potential impacts. A range of evidence sources have been used to inform the assessments including site visits and the Historic Environment Record.
- 4.6 The full list of sites included in the assessment is set out in table 4.1 below. This summarises the impacts identified for each site within the heritage study.
- 4.7 In the original site assessment document, the assessment identified constraints and provided an overall score in the basis of the impacts that might occur. In the interests of a consistent and fair appraisal of site options, mitigation measures were not identified at this stage.
- 4.8 The detailed heritage study goes further by identifying the condition of buildings, their contribution towards the character of Hexham, and the potential impacts taking into consideration mitigation measures.
- 4.9 What the detailed heritage study demonstrates is that (broadly speaking), any issues identified can be mitigated through sensitive design.
- 4.10 Therefore, the potential negative effects flagged in the initial Site Assessments can be avoided.

Table 4.1: Heritage assessment findings for reasonable site options

Site ref	Site name	Initial site assessment summary	Heritage assessment conclusions
Site 2	Hexham Workhouse	Potential significant negative effect identified.	A site with important listed building that is in poor condition. Therefore, there is potential for benefits if the important buildings are retained and sensitive design is achieved.
Site 3	Burn Lane bus depot	Potential significant negative effect recorded due to the presence of listed buildings on site.	There are several listed buildings within or in close proximity / visible from the site. The site contributes to the significance of these assets, but not necessarily in a positive way. Therefore, development presents the potential for benefits.
Site 4	Site on Chareway Lane	No constraints identified	No issues identified
Site 5	Site at caravan Park	No constraints identified.	The site contributes to the significance of heritage assets, but currently not in a positive way. Therefore, there is potential for limited benefits.
Site 6	Priestpople	Potential for moderate or significant adverse effects identified	Impacts are dependent upon design and layout. There could either be benefits or major-moderate adverse effects.
Site 7	Graves Yard	Potential for significant adverse effects identified.	The character of the Conservation Area is considered to be weaker on this site, and so careful development could achieve benefits. However, there are sensitivities in the form of an Army Reserve site and a row of cottages.
Site 9	Telephone exchange	Potential for moderate adverse effects.	The existing building is harmful to the character of Hexham. Its removal therefore presents the potential for positive effects. However, a development of similar form would lead to negative effects so should not form the cue for new designs.
Site 11	Hexham Middle School	Potential for significant adverse effects.	The site has important historic features and therefore development could lead to moderate adverse effects.
Site 12	Broadgates	Potential for significant adverse effects given the location within the Conservation Area.	The current collection of buildings is in various states of disrepair and therefore development presents the opportunity for benefits. There are some historic patterns of development remaining though that would need to be respected.
Site 15	Land at Edgewood	No constraints identified.	No issues identified.
Site 16	Bog Acre Cottage	Potential for moderate adverse effects due to its location adjacent to the Conservation Area.	The site has lost much of its historic context, but low stone boundary stones remain and should be preserved. Overall, there is potential for a beneficial impact.

Site ref	Site name	Initial site assessment summary	Heritage assessment conclusions
Site 17	Police Houses	No constraints identified.	The police house itself does not contribute positively to the character of the conservation area, and so potential benefits are likely provided that important trees are retained.
Site 18	Land west of Station Road	Potential for moderate adverse effects given the location within the Conservation Area.	Makes some contribution to the conservation area, but provided design is sensitive to remaining historic features, development could lead to a beneficial impact.
Site 19	Bus station	Potential for adverse effects given the location within the Conservation Area.	Although altered in the 20th Century the site is very visible and sensitive to change because of the context of historic buildings within which it is located. This presents the potential for major adverse effects. With good quality design though there could be benefits given that the site is in a generally poor condition.

- 4.11 The detailed assessment findings do not contradict the high level constraints analysis in the initial site appraisal process. Therefore, the site selection process remains valid.
- 4.12 For those sites where no constraints were identified (Sites 4, 5, 15 and 17) the detailed heritage study confirms that negative effects are unlikely, or that minor benefits could arise.
- 4.13 For the sites that were initially identified as being constrained, the heritage study acknowledges these constraints, but concludes that beneficial impacts ought to be possible with mitigation measures in place.
- 4.14 With regards to the choice of sites for allocation, the heritage study does not rule out any options as being unsuitable. The important outcome is to ensure that any sites selected for allocation are accompanied by policies that will guide sympathetic design that gives rise to improvements.

5. Appraisal of the Plan

Introduction

- 5.1 Several iterations of the Hexham Neighbourhood Plan have been appraised through the SEA process. This has involved consideration of all the policies in the Plan (in combination) and an assessment of the likely effects. Of particular importance has been the consideration of the effects that will arise as a result of development on sites proposed for allocation.
- 5.2 The Environmental Report sets out a discussion of these effects in relation to a range of environmental objectives. Of particular relevance to this addendum is SEA Objective 4 (Cultural and Natural Heritage).
- 5.3 As mentioned earlier, representations from Historic England suggest that the rationale for effects recorded against this objective needs to be strengthened and justified.
- 5.4 To address these concerns, the SEA has been updated.
- 5.5 The section below is reproduced from the Environmental Report (undertaken at Submission Stage), but changes have been made as deemed necessary to strengthen the justification for predicted effects.

SEA Objective 4: Cultural and natural heritage

Sustainable Development Policies

- 5.6 Policy HNP1 is likely to have a limited effect on cultural and natural heritage due to it focussing more on the social factors of sustainable development.
- 5.7 Policy HNP2 is not likely to have effects on cultural and natural heritage, with the focus being upon sustainable design.
- 5.8 Overall a neutral effect is expected to occur from these policies.

There were no concerns about the assessments relating to these policies. No changes to the policies have been made and so the findings remain exactly the same.

Built environment policies

- 5.9 Policy HNP3 is predicted to have positive effects on the historic environment by requiring development to be sympathetic to its character and make a positive contribution to the setting of heritage assets. The effects are predicted to be minor, as there is already a degree of protection for the built environment in existing plan policies and the NPPF. Having said this, the policy does identify specific views of importance that must be protected. Policy HNP4 also requires consideration of non-designated heritage assets, which provides more thorough consideration for the built environment as a whole.
- 5.10 Policy HNP5 is predicted to have positive effects as it provides a more robust policy approach regarding shop front signage compared to the current policy position. Over the longer term (as older shop front designs are restored) the setting of the town centre ought to be improved.
- 5.11 Policy HNP6 provides specific consideration of the Market Place, which should also ensure that the setting of important buildings in this area is protected.

There were no concerns about the assessments relating to these policies. No changes to the policies have been made and so the findings remain exactly the same.

Housing policies

- 5.12 Several of the allocated site options are either adjacent to heritage assets, within the Conservation Area and / or contain important buildings on-site. A discussion of the potential effects associated with each site is provided below; taking into account the site specific policies that accompany each site. The effects of the sites are also assessed in combination.
- 5.13 Site HNP8.1 (The Workhouse Site) falls within the Conservation Area and contains several non designated buildings that contribute positively to the character of the Conservation Area. Without development, these buildings could be vulnerable, but their loss as part of a new development would arguably be a more negative effect. The site policy recognises the importance of the buildings though and seeks to avoid demolition; which minimises the risk of negative effects somewhat. The policy also stipulates the need to achieve high quality landscaping, which will strengthen the feature of tree lined streets in this part of the Conservation Area. Given the scale of the site, the amount of homes involved, and the desire for a denser development, it should be possible for development to be accommodated without the need to demolish the most sensitive buildings. As a consequence, the effects are predicted to be potentially positive.
- 5.14 Site HNP8.2 (The Telephone Exchange) is in a fairly sensitive location, but the existing building on site is of modern design that detracts from the character of the Conservation Area. Demolition and redevelopment therefore offers the potential for minor positive effects. It will be important to ensure that views and the roofscape of the Conservation Area are protected, and this is acknowledged in the policy.
- 5.15 Site HNP8.3 (Land at Edgewood) is not within a sensitive location, is very small scale, and the supporting policy seeks high quality design. Therefore, neutral effects are predicted.
- 5.16 Site HNP8.4 (Land West of Station Road) contains some buildings and boundary features of historic value (though not designated). The remainder of the site consists of hardstanding, porta cabins, and industrial units with no historic value. Development that retains the historically important features of the site would have positive effects as it could better reveal the site and improve design features. The site policy recognises these features and seeks to protect them, which should minimise effects. However there is a clause that would allow for harm to buildings should development not be viable or it would not be possible to retain them. It is therefore not possible to state with absolute certainty that negative effects would not occur. These would only be likely to be minor though as it should at least be possible to retain boundary walls and facades.
- 5.17 Site HNP8.5 (Bog Acre Cottage and Haulage Site) is adjacent to the Conservation Area and visible from the Hexham Middle School. However, the buildings and land are in poor and vacant condition. The historic setting of the sites has been radically altered by residential development, and so it has little value in this respect. It contributes in a limited way to the setting of Hexham Middle School, and therefore, neutral effects are predicted.
- 5.18 Site HNP8.6 (Priestpottle County Buildings) is located in the Conservation Area in a prominent location. The site comprises mostly of buildings and hardstanding that do not contribute positively to the built environment. Though there are some local buildings of interest to the rear of the site, these could be incorporated into the site design, as acknowledged in the site policy. Provided a high quality design is secured, then benefits are likely to arise.

- 5.19 Site HNP8.7 (Graves Yard) contains buildings with local historical character. Their removal could have negative effects upon the character of the Conservation Area. The site policy seeks to avoid this situation by requiring the retention of non-designated heritage assets that make a positive contribution to the area. This minimises the potential for adverse effects.
- 5.20 Site HNP8.8 (Broadgates) is currently underused and in a poor state. Therefore, a well-designed development should help to enhance this part of the town. There are some historic features that can still be seen in the surrounding area though and development will need to respect this. The site policy recognises the need for appropriate design and so neutral or potentially positive effects are predicted.
- 5.21 Site HNP8.9 (Police Houses) is within the Conservation Area. The built structures on site have no historic value, and so redevelopment will have neutral effects in this respect. The site policy recognises the importance of trees to the character of the Conservation Area, and the need to deliver a sympathetic, high-quality design should ensure that such features are protected and limited adverse effects are generated.
- 5.22 Site HNP8.10 (Bus Depot and Chareway Lane) could potentially lead to the harm of a listed building (house of correction) which would be a significant negative effect. It was recommended that the associated policy seek to protect and enhance this heritage asset as part of any development if possible. Subsequent to the SEA, changes were made to the policy, which should ensure that adverse effects are not significant and possibly positive (given that development would clear the bus depot buildings).
- 5.23 Policy HNP9 ought to have some slight positive effects on heritage through the retention of trees, hedgerows and historic features.
- 5.24 Policies HNP9, HNP10 and HNP12 are predicted to have neutral effects upon the historic environment, as they relate to the type of housing, rather than its appearance or location.

This section has been amended substantially in response to representations made by Historic England. The overall conclusions however remain broadly the same (i.e. the effects of the site allocations individually are either neutral or positive).

Local economy policies

- 5.25 Policy HNP22 should help to retain the character of the town centre and primary shopping area, by only allowing suitable uses.
- 5.26 Policy HNP23 could help to improve access to heritage features, by supporting suitable accommodation in Hexham.
- 5.27 Policies, HNP24, HNP25 and LE5 are unlikely to have effects on the built environment, as development would need to adhere to the provisions of BE1.

There were no concerns about the assessments relating to these policies. No changes to the policies have been made and so the findings remain exactly the same.

Natural environment, health and wellbeing

- 5.28 Policies HNP13-HNP16 are predicted to have neutral effects. Whilst open space / green infrastructure can help contribute to the character of the historic environment, the protection of these areas is unlikely to have significant effects on Hexham's character.

- 5.29 Policy HNP17 explicitly mentions the need to protect trees, hedges and verges that add to the street scene, and so a minor positive effect is predicted.
- 5.30 Policy HNP18 is predicted to contribute positively to the night time appearance of the town by controlling lighting in new development
- 5.31 By listing buildings of important community value, they ought to be better managed and protected, helping to conserve the character of the town.
- 5.32 Policy HNP20 is predicted to have a neutral effect. Protection for the historic environment from renewable energy schemes is already afforded in the NPPF.
- 5.33 Policy HNP21 could have some minor positive effects by improving the links between the town centre and residential areas.
- 5.34 Overall the policies are predicted to have a minor positive effect. Although the policies add some locally specific protection for community facilities and open space, the magnitude of effects is predicted to be low (and so effects are not significant).

There were no concerns about the assessments relating to these policies. No changes to the policies have been made and so the findings remain exactly the same.

Overall (cumulative) effects

- 5.35 The site allocations proposed in the Plan are predicted to have mostly neutral or minor positive effects. Though there are some historic features on several sites, the condition of the sites is generally poor and development offers the potential to better reveal the significance of assets and to contribute to a higher quality build environment.
- 5.36 The loss or damage of heritage assets and features should be possible to avoid, but is not an absolute guarantee. However, site specific policies and general policies relating to design and heritage should ensure that important features are retained, and incorporated into new developments. Measures such as improved landscaping should also help to improve the character of the Conservation Area.
- 5.37 Further plan policies provide an enhancement to the local policy context by affording greater protection to locally important buildings, a more robust approach to shop-front signage, and a strategy for the Market Place. In combination with the positive effects that ought to be generated from the development of the allocated sites, a **significant positive effect** could be accrued in the long term.

The overall conclusions remain the same in relation to the historic environment.

6. Mitigation and enhancement

- 6.1 It is not considered necessary to recommend further amendments (particularly as no significant negative effects have been identified).

7. Monitoring

- 7.1 Monitoring measures are set out within the Environmental Report. There is no need to propose additional monitoring measures as the site appraisal findings remain virtually the same (and importantly, no significant effects have been identified).

8. Discussion of alternatives

- 8.1 This section has been included within the Addendum to build upon the discussions relating to reasonable alternatives that are set out in Section 4 of the Environmental Report.
- 8.2 The reasonable alternatives should be established in response to the objectives of the Plan (i.e. a consideration of whether there are different ways to achieve these objectives).
- 8.3 Each Plan objective is set out below with a discussion of potential alternatives that were considered throughout the plan-making process.

1.Sustainability: *This seeks to ensure that development is truly sustainable and of a high quality design.*

Many factors influence whether a plan will achieve sustainable development. With regards to design policy and specific measures, this is not a strategic matter where different policies should be tested in an SEA.

There are no specific alternatives of a strategic nature that can be tested in the SEA to determine whether development will be 'sustainable' or not. The amount and distribution of development can influence whether development is sustainable, and this is considered as part of the options that deal with housing and employment strategy.

2. Our built and historic environment: *This seeks to retain and improve the character of Hexham. The main way that this is tackled is through policy measures.*

There are no reasonable strategic alternatives as to how this objective could be achieved. The pattern and scale of growth can affect the built environment, but the alternatives relating to housing and employment deal with these matters.

3. Housing: *This objective seeks to achieve the right number, type and size of new homes in Hexham.*

There are different ways that this objective can be achieved, and these are explored through consideration of strategic and site specific alternatives (as set out in Section 4 of the Environmental Report).

4. Natural Environment, Health and Wellbeing: *This seeks to improve health and wellbeing through good access to facilities and recreation.*

A network of green spaces is important. Access can be improved through the provision of new facilities, the improvement of existing ones, and the improvement of transport links. There is therefore a range of ways that this objective can be achieved. From an SEA perspective, there are no reasonable alternatives to test that are distinct individual approaches. This objective will be met through several policy measures and the overall spatial strategy.

5. Local Economy: *This seeks to support existing industry and businesses with a special focus on Hexham as a growth area for small business and enterprise. The importance of tourism is also acknowledged.*

There are different ways that existing business can be supported. This includes protection for existing employment areas, and support for new appropriate small-scale development. This can be achieved through policy measures that reflect these aims (i.e. the plan approach). An alternative approach would be to identify new locations for more modern employment space, and allow for a change of use for existing locations. This approach could support industry in the town and could be a benefit for existing businesses that wish to upgrade premises. However, it presents numerous problems. First, it may not reflect the wishes of current businesses, it would not make best use of existing infrastructure, and could lead to derelict and vacant (former) employment space. In addition, it is important to note that strategic employment matters are being dealt with in the emerging Local Plan. Therefore, it is considered that there are no reasonable alternatives with regards to support for the local economy.

With regards to new employment land, this is a matter that is being dealt with in the emerging Local Plan, and so there are no alternatives tested through the HNP SEA process.

Strategic growth and distribution options for housing

- 8.4 The process of considering and appraising alternatives for housing growth and distribution is explained in Chapter 4 of the Environmental Report. Given that this was published in September 2018, it is considered useful to refresh the discussion to take account of the current position in relation to the Northumberland Local Plan (which was submitted for Examination in May 2019).
- 8.5 With regards to housing growth, the position of the Hexham Plan is as follows:
- An indicative target of 530 dwellings has been apportioned to Hexham. The rationale for this target is set out in the Housing Distribution Technical Paper prepared to support the Northumberland Local Plan. An up to date record of commitments and completions shows that there is a total of 272 completions and commitments; leaving a residual requirement of 258 dwellings. The Neighbourhood Plan and Local Plan seek to meet this residual need through the allocation of land for housing. A reasonable allowance for windfall development will also contribute towards meeting needs.
 - The Local Plan was not relying upon provisions in the Hexham NP to meet the residual needs. However, a refusal of 43 dwellings on a recent application means that there is now a small shortfall in meeting needs. The Neighbourhood Plan allocates several smaller additional sites compared to the Local Plan which reduces this shortfall somewhat (*between 18 and 61 dwellings depending upon delivery on the allocated sites*).
 - The strategic approach is to meet needs in full without requiring release of green belt. Given that the NP (in conjunction with the Local Plan) demonstrates that most of these needs will likely be met, it is considered unnecessary to test approaches that involve green belt release. There is a degree of contingency provided by factoring in a windfall allowance. In particular, the Hexham Middle School site could provide scope for additional new housing development through conversion and new build (once the school has relocated).

8.6 With regards to distribution the position remains as follows:

- Green belt issues are not being dealt with through the Neighbourhood Plan. Although such factors can now be dealt with through neighbourhood planning; the group has confirmed with the Council that these are matters being dealt with through the emerging Local Plan (which does not proposed to release green belt land in Hexham anyway).
- The green belt is drawn tightly around the built-up area of Hexham. It has therefore been necessary to find brownfield sites in the Neighbourhood Area to contribute towards the identified housing requirement of 530 dwellings over the Plan period (2016 – 2036).
- Given the high level of needs, there are limited strategic alternatives as to the configuration of brownfield development in the town. Therefore, the distribution of development has been largely determined through a site selection process (with all sites considered to be deliverable and appropriate being proposed for allocation).
- The sites proposed for allocation in the HNP are mirrored in the Submitted Local Plan, with several additional smaller sites proposed in the NP. The choice if these sites is supported by a site assessment process.

9. Next Steps

- 9.1 This second addendum has been prepared to satisfy Northumberland County Council that the requirements of the SEA Regulations have been met.
- 9.2 The next step is to finalise the independent Examination of the Plan in light of the updated SEA and minor amendments to the Plan.
- 9.3 Should further changes be made to the Plan, the SEA will need to be updated to reflect them (by way of a further addendum).
- 9.4 The Plan can then be put to a referendum so that members of the community can vote on whether or not the Plan will be 'made'.
- 9.5 Once made the Plan will form part of the Local Plan for Northumberland.

