

Screening Statement on the determination of the need for a Strategic Environmental Assessment (SEA) in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 and European Directive 2001/42/EC for the Thame Neighbourhood Development Plan

21ST MAY 2021

SUMMARY

Following consultation with the statutory bodies, South Oxfordshire District Council (the 'Council') determines that Thame Neighbourhood Development Plan Review (NDPR) does require a Strategic Environmental Assessment (SEA).

INTRODUCTION

1. An initial screening opinion was used to determine whether or not the contents of the emerging Thame Neighbourhood Development Plan Review requires a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/EC (the Directive) and associated Environmental Assessment of Plans and Programmes Regulations 2004 (the Regulations).
2. Any land use plan or programme 'which sets the framework for future development consent of projects' must be screened according to a set of criteria from Annex II of the Directive and Schedule 1 of the Regulations. These criteria include exceptions for plans 'which determine the use of a small area at local level' or which only propose 'minor modifications to a plan', if it is determined that the plan is unlikely to have significant environmental effects.
3. The initial screening opinion was subject to consultation with Historic England, the Environment Agency and Natural England. The results of the screening process are detailed in this Screening Statement.

THE SCREENING PROCESS

1. Using the criteria set out in Annex II of the Directive and Schedule 1 of the Regulations, a Screening Opinion determines whether a plan or programme is likely to have significant environmental effects.
2. The extract from 'A Practical Guide to the Strategic Environmental Assessment Directive' in Appendix 1 provides a flow diagram to demonstrate the SEA screening process.
3. Table 1 in Appendix 1 sets out the criteria from the Practical Guide, along with an assessment of the Thame Neighbourhood Development Plan Review against each criterion to ascertain whether a SEA is required.

4. Also part of the screening process is the Habitats Regulations Assessment Screening, which can be found in Appendix 2, and the assessment of likely significance effects on the environment, which can be found in Appendix 3.
5. These two assessments feed into Table 1 and the SEA screening opinion.

THAME NEIGHBOURHOOD DEVELOPMENT PLAN REVIEW

6. The Thame Neighbourhood Development Plan was made in 2013. The vision and objectives in that were subject to consultation in 2019, during which they were ratified as the basis for review of the Plan. The Thame Neighbourhood Development Plan Review will therefore contain the following vision and objectives:

The overarching vision statement for Thame is that:

'Thame must maintain its character as a real market town'.

Expanding this means that:

- *Thame must continue to feel 'compact'.*
- *Thame must continue to have a close relationship with the open countryside around it.*
- *Thame must retain its markets, festivals and events.*
- *Thame must continue to act as a centre for the surrounding area not just its residents.*

Objectives

Objective set 1, Housing:

1. *Integrate new housing into Thame*
2. *Provide a greater range of affordable housing*
3. *Provide a range of different housing types across all tenures*

Objective set 2, Working and Shopping:

1. *Support Thame's shop*
2. *Provide new employment*
3. *Make sure the Cattle Market site supports Thame town centre*

Objective set 3, Getting around:

1. *Connect new housing into Thame and the wider area with good pedestrian, cycle and bus connections*
2. *Improve existing pedestrian and cycle connections within Thame*
3. *Improve connections to surrounding destinations*
4. *Plan public transport to better meet users' needs*
5. *Ensure car parking within the town supports the viability of the town centre*

Objective set 4, Community, Leisure and Wellbeing:

1. *Provide a large community facility*

2. *Ensure the Thame Neighbourhood Plan meets the needs of local people*
3. *Allocate land for a primary school*

Objective set 5, Environment, Sustainability and Design Quality:

1. *Co-ordinate green infrastructure*
 2. *Provide more public open space*
 3. *Improve existing open space*
 4. *Provide riverside walks within natural green space*
 5. *Co-ordinate sports provision*
 6. *New development to address flooding and drainage issues*
 7. *Encourage energy efficient and sustainable development*
 8. *Development should reinforce the character and quality of Thame*
7. The SEA screening process is concerned with whether a neighbourhood plan is likely to have a significant environmental effect. Within this context, wider considerations of the draft neighbourhood plan's potential conformity with the Basic Conditions are not considered and as a consequence, the council is required to consider the proposals in the plan as they are, not as they may be modified (if necessary) to meet the Basic Conditions.
 8. The Thame Neighbourhood Development Plan Review is seeking to contain site allocations in response to the housing and employment requirements for Thame established in the South Oxfordshire Local Plan 2035.
 9. Policy H3 of the Local Plan sets out a minimum outstanding housing requirement of 339 homes to be allocated within Thame. The Local Plan also requires, through policy EMP6, a further minimum of 3.5 hectares of employment land to be delivered in addition to the current allocations within the existing Neighbourhood Plan. Both policies complement the strategy for Thame set through policy TH1 of the Local Plan.
 10. This policy states that the neighbourhood plan is expected to; deliver homes in accordance with policy H3; strengthen the retail offer within Thame Town Centre; improve the attraction of Thame for visitors and businesses; improve accessibility, car and cycle parking, pedestrian and cycle links; support schemes that enhance the quality of the town's environment and conserve and enhance the towns' heritage assets; provide new employment opportunities and improve the stock of existing employment areas; and, provide new, or enhanced community facilities that meet an identified need.
 11. There is a requirement for the Thame Neighbourhood Plan Review to have reached submission stage within a year of adopting the South Oxfordshire Local Plan and to have allocated sufficient sites to meet the housing and employment requirements. If this requirement is not met, planning applications for housing and employment will be supported provided that proposals comply with the overall strategies for housing and

employment within the plan and the overall plan distribution strategy as set out in STRAT1

12. The Thame Neighbourhood Development Plan Review will be seeking to allocate land for housing and employment development to meet the requirements set within the South Oxfordshire Local Plan. It is not yet known the location of the sites that will be allocated and so significant harm to the environment cannot be ruled out.
13. On this basis we conclude that the Thame Neighbourhood Development Plan Review is likely to result in significant effects on the environment.

CONSULTATION RESPONSES

14. The screening opinion was sent to Natural England, The Environment Agency and Historic England on 24 May 2021 for a four-week consultation period. The responses in full are presented in Appendix 4.
15. Natural England is satisfied with the conclusion of the Screening Opinion with regard to the need for a SEA.
16. Historic England confirmed their agreement, that the Thame Neighbourhood Development Plan Review does need a SEA.
17. The Environment Agency did not provide comments on this SEA Screening.

CONCLUSION

18. As a result of the screening undertaken by the Council, the following determination has been reached.
19. The Thame Neighbourhood Development Plan Review is unlikely to have significant effects on Natura 2000 sites; therefore, an Appropriate Assessment for the Thame Neighbourhood Development Plan Review is not required.
20. Based on the assessment presented in Appendices 1 & 3, the Thame Neighbourhood Development Plan Review is likely to have a significant effect on the environment.
21. The Thame Neighbourhood Development Plan Review therefore does require a Strategic Environment Assessment.

Authorised by: Ricardo Rios
On behalf of Head of Planning

Signed: 

Date:

Appendix 1 – Extract from ‘A Practical Guide to the Strategic Environmental Assessment Directive’ (DCLG) (2005)

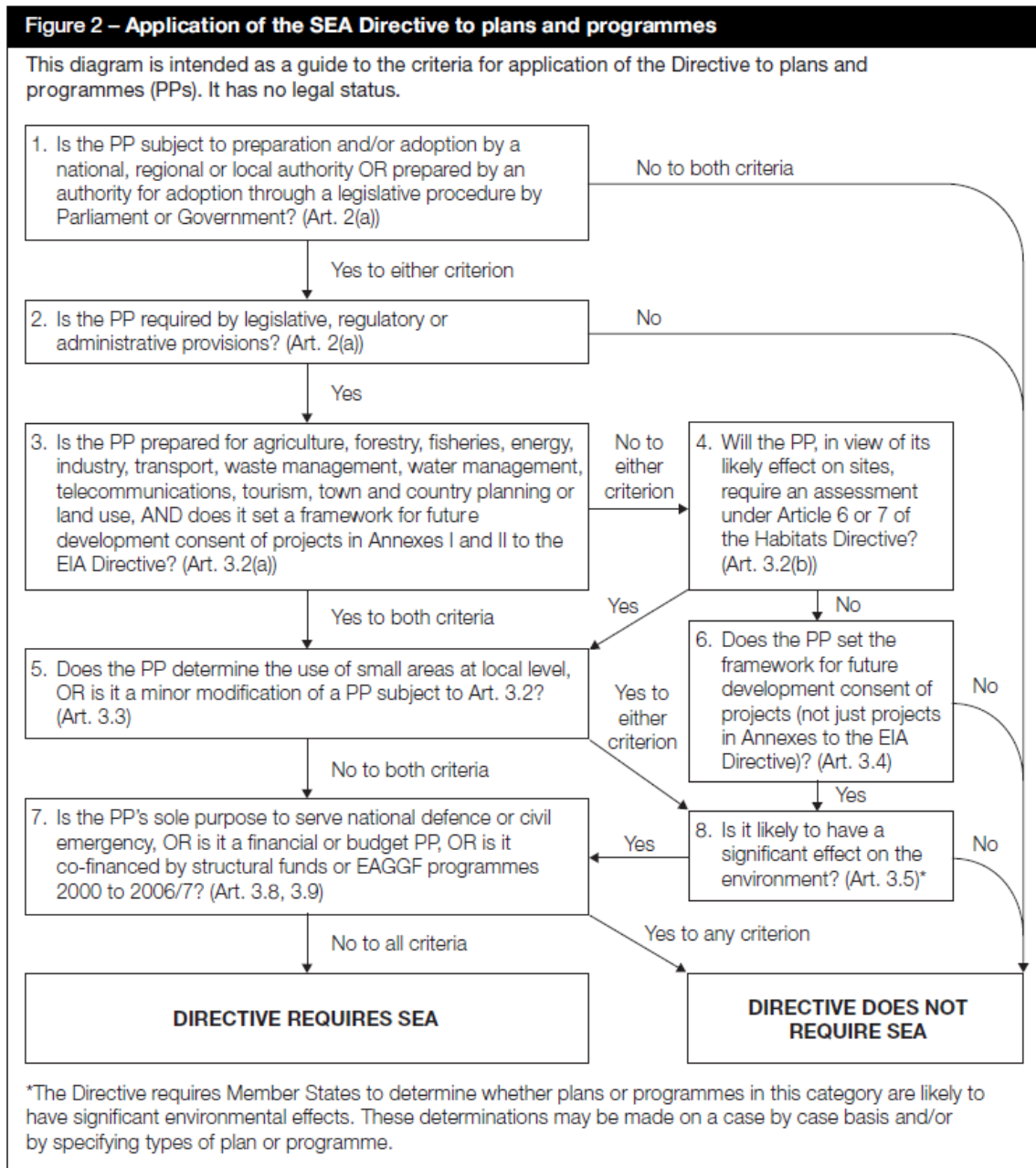


Table 1: Application of SEA Directive as shown in Appendix 1

Stage	Y/N	Explanation
<p>1. Is the Neighbourhood Plan 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? (Art. 2(a))</p>	<p>Y</p>	<p>The preparation of and adoption of the Neighbourhood Development Plan is allowed under the Town and Country Planning Act 1990 as amended by the Localism Act 2011. The Neighbourhood Plan is being prepared by the Thame Neighbourhood Development Plan Steering Group, a working group who report to the Thame Town Council (as the “relevant body”) and will be “made” by South Oxfordshire District Council as the local authority. The preparation of Neighbourhood Plans is subject to the following regulations:</p> <ul style="list-style-type: none"> • The Neighbourhood Planning (General) Regulations 2012 • The Neighbourhood Planning (referendums) Regulations 2012 • The Neighbourhood Planning (General) (Amendment) Regulations 2015 • The Neighbourhood Planning (Referendums) (Amendment) Regulations 2016 • The Neighbourhood Planning (General) (Amendment) Regulations 2016 • The Neighbourhood Planning (General) (Amendment) Regulations 2017
<p>2. Is the NP required by legislative, regulatory or administrative provisions? (Art. 2(a))</p>	<p>Y</p>	<p>Whilst the Neighbourhood Development Plan is not a requirement and is optional under the provisions of the Town and Country Planning Act 1990 as amended by the Localism Act 2011, it will, if “made”, form part of the Development Plan for the District. It is therefore important that the screening process considers whether it is likely to have significant environmental effects and hence whether SEA is required under the Directive.</p>

		National Planning Practice Guidance (Paragraph: 051 Reference ID: 41-051-20150209) sets out that draft neighbourhood plan proposals should be assessed to determine whether the plan is likely to have significant environmental effects. This assessment should be undertaken in accordance with the requirements set out in regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004 .
3. Is the Neighbourhood Plan prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, 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 (see Appendix 2) to the EIA Directive? (Art 3.2(a))	Y	The Thame Neighbourhood Development Plan Review is prepared for town and country planning and land use and it is possible that it may set out a framework for future development of projects that would require an EIA.
4. Will the Neighbourhood Plan, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))	N	The Thame Neighbourhood Development Plan Review is unlikely to have significant effects on Natura 2000 sites. See Habitat Regulations Assessment (HRA) Screening Opinion for the Thame Neighbourhood Development Plan Review in Appendix 2.
5. Does the Neighbourhood Plan determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art. 3.2? (Art. 3.3)	Y	The Thame Neighbourhood Development Plan Review will determine the use of sites/small areas at a local level.
6. Does the Neighbourhood Plan set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3.4)	Y	When made, the Thame Neighbourhood Development Plan Review will include a series of policies to guide development within the town boundary. This will inform the determination of planning applications providing a framework for future development consent of projects.

7. Is the Neighbourhood Plan's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art 3.8, 3.9)	N	N/A
8. Is it likely to have a significant effect on the environment? (Art. 3.5)	Y	The plan is likely to have significant effects on the environment. See assessment of the likely significance of effects on the environment in Appendix 3.

Appendix 2 - Habitat Regulations Assessment (HRA) Screening Opinion for the Thame Neighbourhood Development Plan Review

INTRODUCTION

1. The Local Authority is the “competent authority” under the Conservation of Habitats and Species Regulations 2017, and needs to ensure that Neighbourhood Plans have been assessed through the Habitats Regulations process. This looks at the potential for significant impacts on nature conservation sites that are of European importance¹, also referred to as Natura 2000.
2. This Screening Assessment relates to a Neighbourhood Development Plan that will be in general conformity with the strategic policies within the development plan² (the higher level plan for town and country planning and land use). This Screening Assessment uses the Habitats Regulations Assessment of South Oxfordshire District Council’s Local Plan³ as its basis for assessment. From this, the Local Authority will determine whether the Thame Neighbourhood Development Plan Review is likely to result in significant impacts on Natura 2000 sites either alone or in combination with other plans and policies and, therefore, whether an ‘Appropriate Assessment’ is required.

LEGISLATIVE BASIS

3. Article 6(3) of the EU Habitats Directive provides that:

“Any plan or project not directly connected with or necessary to the management of the [European] site but likely to have a significant effect thereon, 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.”

4. Regulations 105-106 of the Conservation of Habitats and Species Regulations 2017 state:

“105.—(1) Where a land use plan—

¹ Special Protection Areas (SPAs) for birds and Special Areas of Conservation (SACs) for other species, and for habitats.

² The South Oxfordshire Local Plan 2035

³ South Oxfordshire Local Plan Habitats Regulations Assessment Report (March 2019)

- (a) *is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and*
- (b) *is not directly connected with or necessary to the management of the site, the plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives.*
- (2) *The plan-making authority must for the purposes of the assessment consult the appropriate nature conservation body and have regard to any representations made by that body within such reasonable time as the authority specifies.*
- (3) *The plan-making authority must also, if it considers it appropriate, take the opinion of the general public, and if it does so, it must take such steps for that purpose as it considers appropriate.*
- (4) *In the light of the conclusions of the assessment, and subject to regulation 107, the plan-making authority must give effect to the land use plan only after having ascertained that it will not adversely affect the integrity of the European site or the European offshore marine site (as the case may be).*
- (5) *A plan-making authority must provide such information as the appropriate authority may reasonably require for the purposes of the discharge by the appropriate authority of its obligations under this Chapter.*
- (6) *This regulation does not apply in relation to a site which is—*
- (a) *a European site by reason of regulation 8(1)(c), or*
- (b) *a European offshore marine site by reason of regulation 18(c) of the Offshore Marine Conservation Regulations (site protected in accordance with Article 5(4) of the Habitats Directive).*

106.—(1) *A qualifying body which submits a proposal for a neighbourhood development plan must provide such information as the competent authority may reasonably require for the purposes of the assessment under regulation 105 or to enable it to determine whether that assessment is required.*

(2) *In this regulation, “qualifying body” means a parish council, or an organisation or body designated as a neighbourhood forum, authorised for the purposes of a neighbourhood development plan to act in relation to a neighbourhood area as a result of section 61F of the TCPA 1990 (authorisation to act in relation to neighbourhood areas)(159), as*

applied by section 38C of the 2004 Planning Act (supplementary provisions)(160).

(3) Where the competent authority decides to revoke or modify a neighbourhood development plan after it has been made, it must for that purpose make an appropriate assessment of the implications for any European site likely to be significantly affected in view of that site's conservation objectives; and regulation 105 and paragraph (1) apply with the appropriate modifications in relation to such a revocation or modification.

(4) This regulation applies in relation to England only."

ASSESSMENT

5. The HRA of the South Oxfordshire Local Plan 2035 used a screening distance of 17km to identify European sites which could be affected by development from the plan. This distance has been subject to consultation with Natural England and reflects the average travel to work distance in the district. As such, the same distance has been applied in this HRA Screening.
6. The following European sites lie wholly or partly within 17km of Thame and have been taken into consideration:
 - Aston Rowant SAC – Approximately 8.8km
7. Aston Rowant is classified as SAC because it supports one of the largest remaining populations of juniper in lowland Britain. It is selected as an example of juniper formations on the chalk in the south east of England. At this site juniper is present as part of a mixed scrub community but also occurs as isolated bushes in chalk grassland. In common with most lowland populations of juniper, successful reproduction and survival of new generations of bushes is extremely rare and conservation is currently dependent upon significant levels of management intervention. The low level of reproductive success is the main threat to the feature at this site. Aston Rowant also supports Asperulo-Fagetum beech forests although this is not a primary reason for classification as SAC.
8. The main pressures and threats to this site include an unsustainable on-site population, changes in species distribution, disease of juniper as well as the impacts of air pollution and the risks of atmospheric nitrogen deposition upon juniper. Additionally, conflicting conservation objectives threaten beech.
 - Chilterns Beechwoods SAC – Approximately 11.8km

9. The Chilterns Beechwoods SAC comprises nine separate sites scattered across the Chilterns. There are three features of interest: semi-natural grasslands and scrubland on chalk; Asperulo-Fagetum beech woodland (for which this is considered to be one of the best areas in the UK and lies in the centre of the habitat's UK range); and Stag beetle *Lucanus cervus*, for which the area is considered to support a significant presence. The rare coralroot *Cardamine bulbifera* is found in these woods.
10. The main pressures and threats to this site include the impacts of forestry and woodland management, disease, deer and the invasive species of grey squirrel upon beech. Additionally, the changes in species distribution of stag beetle as well as the impact of public access and disturbance upon stag beetle. Air pollution and the impact of atmospheric nitrogen deposition also threaten the dry grasslands, beech and stag beetle.
11. As required under Regulation 106 of the Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations'), the qualifying body (Thame Town Council) provided the required information to enable South Oxfordshire District Council to determine whether the assessment under Regulation 105 is required. Consideration has been given to the potential for the development proposed by the neighbourhood plan to result in significant effects associated with:

Physical loss of/damage to habitat:

12. Any development resulting from the Neighbourhood Plan will be located within the neighbourhood area. There are no European sites within the Neighbourhood Plan area, therefore loss of habitat from within the boundaries of a European site can be ruled out.
13. Loss of habitat from outside of the boundaries of a European site could still affect the integrity of that site if it occurs in an area used by the qualifying species of the site (e.g. for off-site breeding, foraging or roosting). One of the European sites included in this assessment have mobile species amongst their qualifying features that could travel outside of the site to make use of other areas of habitat:
 - Chiltern Beechwoods SAC: Stag Beetle
14. The HRA (March 2019) produced alongside the emerging Local Plan 2034 states that where stag beetle is a qualifying feature of a site, the individuals may travel outside of the SAC boundary, although it is unlikely that they will travel far – it is generally only the male stag beetle that flies during the summer months, and the female beetle rarely flies. The preferred habitat for stag beetles is old, established woodland, and the larvae feed on rotting tree matter. As the beetle larvae take years to develop, they can be vulnerable to tree clearance and the 'tidying up' of wood in parks and especially gardens. Research suggests that 2 km may be an appropriate buffer inside which sites could be functionally

connected, as this is the distance that males travel to females during the breeding season. Chilterns Beechwoods SAC is a composite of nine SSSIs.

15. Bisham Woods SSSI, which is the part of the Chiltern Beechwoods SAC that supports the qualifying stag beetle population, is greater than 2 km from the District boundary. Therefore, potential loss of or damage to off-site habitats associated with Chilterns Beechwoods SAC can be screened out of further assessment.

Non-physical disturbance e.g. noise/vibration or light pollution;

16. The most recent HRA of the South Oxfordshire Local Plan (March 2019) states:

'Using a precautionary approach, we have assumed that the effect of noise, vibration and light are most likely to be significant if development takes place within 500 metres of a European site with qualifying features sensitive to these disturbances, or known off-site breeding, foraging or roosting areas.'

17. None of the European sites are within 500 metres of the designated area. Therefore, effects in relation to noise, vibration and light pollution can be screened out of further assessment.

Air Pollution;

18. Air pollution is most likely to effect European sites where plant, soil and water habitats are the qualifying feature, but some qualifying animal species may also be affected, either directly or indirectly, by any deterioration in habitat as a result of air pollution. Deposition of pollutants to the ground and vegetation can alter the characteristics of the soil, affecting the pH and nitrogen availability that can then affect plant health, productivity and species composition.
19. Based on the Highways Agency Design for Road and Bridges (DMRB) Manual Volume 11, Section 3, Part 120 (which was produced to provide advice regarding the design, assessment and operation of trunk roads (including motorways)), it is assumed that air pollution from roads is unlikely to be significant beyond 200m from the road itself.
20. The European sites within 17km of Thame that are within 200m of strategic roads are Aston Rowant SAC (M40) and Chiltern Beechwoods SAC (A3404, A4010). As highlighted above, Thame is approximately 8.8km away from Aston Rowant SAC and approximately 11.8km from Chiltern Beechwoods SAC.
21. The HRA sets out how South Oxfordshire District Council commissioned Atkins to model the effects of the Local Plan on traffic flows within the District. No traffic data were available for the roads

adjacent to Chilterns Beechwoods SAC as they are located too far outside of the Atkins model network to be reasonably or reliably predicted. Although these locations lie within the initial screening radius of 17 km, the HRA for the Local Plan concluded that the contribution of growth within the Local Plan, including the requirement for Thame Neighbourhood Development Plan Review, to traffic flows at these locations would be de minimis, and as such they are screened out from any further assessment.

22. In relation to the Aston Rowant SAC the HRA (March 2019) states:

'In light of the above analysis, it is concluded that the ecological effects of the predicted increase in NO_x concentrations and nutrient nitrogen deposition would either be negligible, or that any small effects would be highly unlikely to result in a deterioration in the condition of the qualifying features, and as such it is concluded that the in-combination effects of planned growth would not result in an adverse effect on the integrity of the Aston Rowant SAC.'

23. Given the modest scale of the proposed development in the Neighbourhood Development Plan Review, the distance between the Aston Rowant SAC, Chiltern Beechwoods SAC and Thame, the potential impact associated with the two SAC's can be screened out of further assessment.

Increased recreation pressure; and

24. The most recent HRA of the South Oxfordshire Local Plan 2035 (March 2019) states;

'Natural England's Site Improvement Plans record the threats and pressures relevant to each European site. Public access or disturbance are not identified as current threats or pressures at the following sites, despite their lying close to large settlements: Aston Rowant SAC, Hartslock Wood SAC, Cothill Fen SAC, and Oxford Meadow SAC.'

25. The HRA of the Local Plan identifies that at the Chiltern Beechwoods SAC, public access / disturbance is only identified in relation to the stag beetle population. The portion of the SAC that supports the stag beetle population (Bisham Woods SSSI) is greater than 7km from the District boundary, and therefore is considered unlikely to result in likely significant effects from development within South Oxfordshire, either alone or in-combination with other plans or projects.

26. Therefore, likely significant effects in relation to visitor pressure and the impact of recreation can be ruled out and do not need to be considered further.

Changes to hydrological regimes

27. European sites at which aquatic or wetland environments support qualifying features have the potential to be affected by changes in water quantity or quality. The HRA for the Local Plan does not identify either Aston Rowant SAC or Chiltern Beechwoods SAC to have aquatic or wetland habitats or are likely to be sensitive to changes in water quality or quantity.
28. The South Oxfordshire Local Plan 2035 sets the requirements for the review of the Neighbourhood plan to allocate sites. The policies which set the requirements for the neighbourhood plan review has been considered through the HRA of the Local Plan 2035. The HRA concluded that the Local Plan is not likely to lead to adverse effects on the integrity of any European Sites either alone or in-combination with other plans and projects. The Council has considered the HRA of the Local Plan 2035 (March 2019) in respect of the potential in combination effects of the potential proposals in Thame Neighbourhood Plan Review.
29. The Plan does seek to allocate sites for development in line with the requirements set within the Local Plan, however this already been considered through the Local Plan HRA. Given the modest scale of development proposed and having regard to conclusions of paragraphs 5 to 28, it is considered that the development proposed in the Thame Neighbourhood Plan Review is not likely to give rise to significant in effects on Natura 2000 sites either alone or in combination with other plans and programmes.

CONCLUSION

30. The Thame Neighbourhood Development Plan Review is unlikely to have significant effects on Natura 2000 sites, either alone or in combination with other plans or projects, therefore, an Appropriate Assessment for the Thame Neighbourhood Development Plan Review is not required

Appendix 3 - Assessment of the likely significance of effects on the environment

1. Characteristics of the Plan, having regard to:	
<p>(a) 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;</p>	<p>The Thame Neighbourhood Development Plan Review would, if adopted, form part of the Statutory Development Plan and as such does contribute to the framework for future development consent of projects. However, the Plan will sit within the wider framework set by the National Planning Policy Framework and the strategic policies of the South Oxfordshire Local Plan 2035.</p> <p>The Thame Neighbourhood Plan Review will contain site allocations to meet the requirements within the South Oxfordshire Local Plan. These allocations will primarily be for housing and employment uses; however additional retail floor space will also be provided within Thame. The location of these sites has not yet been determined. A site selection process is currently being undertaken.</p>
<p>(b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;</p>	<p>A Neighbourhood Development Plan must be in conformity with the Local Plan for the District. It does not influence other plans.</p>
<p>(c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;</p>	<p>National policy requires a presumption in favour of sustainable development, which should be seen as a golden thread through plan-making, including the Thame Neighbourhood Development Plan Review. A basic condition of the Thame Neighbourhood Development Plan Review is to contribute to the achievement of sustainable development.</p>
<p>(d) environmental problems relevant to the plan or programme; and</p>	<p>The Thame Neighbourhood Development Plan Review contains the following designations:</p> <ul style="list-style-type: none"> - Ancient Woodland - Archaeological Constraints

	<ul style="list-style-type: none"> - BAP Priority habitats - Conservation Area - Flood Zone - Great Crest Newt Distribution - Listed Buildings structures - Local Nature Reserves - Proposed Local Wildlife Site - Protected species buffer - Registered Parks and Gardens - Schedules Ancient Monuments - Tree Preservations Orders <p>There are SACs within 17km of Thame:</p> <ul style="list-style-type: none"> • Aston Rowant SAC – approximately 8.8km • Chilterns Beechwoods SAC – approximately 11.8km <p>Please see detailed assessment in appendix 2 which assesses the likely significant effects on these SAC's.</p> <p>As the Thame Neighbourhood Development Plan Review is allocating sites in a sensitive area, it is not possible to rule out any likely significant effects on the environment and therefore a SEA is required.</p>
<p>(e) 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).</p>	<p>The proposed development in the Thame Neighbourhood Development Plan Review has been judged not to have an impact on Community legislation.</p>
<p>2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:</p>	
<p>(a) the probability, duration, frequency and reversibility of the effects;</p>	<p>The plan proposes to identify land for new housing and employment within the settlement of Thame. South Oxfordshire Local Plan 2035 requires the Thame Neighbourhood Development Plan Review to allocate sites for around 339 dwellings and 3.5 hectares of employment space. Due to the sensitivity of the area and the fact that the location any proposed site allocations is not yet known it is not possible to rule out likely significant effects.</p>

(b) the cumulative nature of the effects;	It is intended that the positive social effects of providing residential development through infill and site allocations will have positive cumulative benefits for the area.
(c) the transboundary nature of the effects;	The effects of the Plan are unlikely to have transboundary ³ impacts.
(d) the risks to human health or the environment (for example, due to accidents);	The policies in the plan are unlikely to present risks to human health or the environment.
(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);	The Thame Neighbourhood Development Plan Review relates to the parish of Thame. The NDP is allocating sites in a very sensitive location. It is proposed by the Local Plan 2035 that the Thame Neighbourhood Development Plan Review should allocate 339 dwellings and 3.5 hectares of employment. Due to the sensitivity of the area and the fact that the location any proposed site allocations is not yet known it is not possible to rule out likely significant effects.
(f) the value and vulnerability of the area likely to be affected due to: (i) special natural characteristics or cultural heritage; (ii) exceeded environmental quality standards or limit values; or (iii) intensive land-use; and	<p>The Thame Neighbourhood Development Plan Review contains the following designations of special natural characteristics or cultural heritage:</p> <ul style="list-style-type: none"> - Ancient Woodland - Archaeological Constraints - BAP Priority habitats - Conservation Area - Flood Zone - Great Crest Newt Distribution - Listed Buildings structures - Local Nature Reserves - Proposed Local Wildlife Site - Protected species buffer - Registered Parks and Gardens - Schedules Ancient Monuments - Tree Preservations Orders <p>The Thame Neighbourhood Development Plan Review offers an opportunity to enhance the natural environment and the cultural heritage of the area through the proposals being considered.</p> <p>However, the NDP is allocating sites in a very sensitive location. It is proposed by the</p>

³ Transboundary effects are understood to be in other Member States.

	<p>Local Plan 2035 that the Thame Neighbourhood Development Plan Review should allocate 339 dwellings and 3.5 hectares of employment. Due to the sensitivity of the area and the fact that the location any proposed site allocations is not yet known it is not possible to rule out likely significant effects.</p>
<p>(g) the effects on areas or landscapes which have a recognised national, Community or international protection status.</p>	<p>There are no areas or landscapes with recognised national, community or international protection status affected by the neighbourhood plan.</p>

APPENDIX 4

NATURAL ENGLAND

Date: 16 June 2021
Our ref: 355036
Your ref: Thame Review Neighbourhood Plan - SEA and HRA Screening
Opinion



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[REDACTED]

BY EMAIL ONLY

Dear [REDACTED]

Thame Review Neighbourhood Plan - SEA and HRA Screening Opinion

Thank you for your consultation on the above dated 24 May 2021 which was received by Natural England on the same day.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Screening Request: Strategic Environmental Assessment and Habitat Regulations Assessment

Guidance on the assessment of Neighbourhood Plans, in light of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended), is contained within the [National Planning Practice Guidance](#). The guidance highlights three triggers that may require the production of an SEA, for instance where:

- a neighbourhood plan allocates sites for development
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

We note that within the screening report a range of special natural characteristics have been identified within the Neighbourhood Plan area, and that the location of proposed site allocations is not yet known. We are therefore satisfied with the conclusion of the report with regard the need for SEA.

Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SEA/SA screening stage, should the responsible authority seek our views on the scoping or environmental report stages. This includes any third party appeal against any screening decision you may make.

We are in agreement with the conclusions of the HRA screening; with regard the screening for likely significant effects from air pollution from traffic, it is understood that the amount of housing proposed through the Thame Neighbourhood Plan Review is within levels assessed through HRA of the Local Plan and we therefore do not consider any further assessment is necessary. Should you consider the plan would increase the amount of housing significantly beyond that already assessed in the Local Plan, we would be pleased to discuss the matter further.

For any queries relating to the specific advice in this letter only please contact [REDACTED] on [REDACTED]. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely,

[REDACTED]
Lead Advisor Sustainable Development
Thames Solent Team

HISTORIC ENGLAND

From: [REDACTED]

Sent: 21 June 2021 18:53

To: [REDACTED]

Subject: RE: Thame Review Neighbourhood Plan - SEA and HRA Screening Opinion - please reply by 21 June

Dear Dorottya

Thank you for consulting Historic England on the Council's draft screening opinion for SEA of Thame Neighbourhood Plan.

We have considered the following factors:

the neighbourhood plan area contains numerous sensitive heritage assets;
the proposal to allocate land for both a large number of residential units (300+) and for commercial development;
the effects of development on the significance of heritage assets can be unavoidable and permanent and should be assessed in planning decisions, including the preparation of development plans (local and neighbourhood);
the location of sites that will be assessed as reasonable options for these allocations is uncertain and, in the absence of this information a precautionary principle should be adopted.

As such we can confirm our agreement with the Council's conclusion that the plan does merit SEA, although we would be pleased to review this opinion if more information is made available.

We hope these comments are of assistance to the District Council.

Yours sincerely

[REDACTED]

[REDACTED] | Historic Places Adviser | South East England | Historic England
Cannon Bridge House | 25 Dowgate Hill | London | EC4R 2YA

THE ENVIRONMENT AGENCY

From: Planning_THM <Planning_THM@environment-agency.gov.uk>
Sent: 28 May 2021 10:59
To: [REDACTED]
Subject: RE: Thame Review Neighbourhood Plan - SEA and HRA Screening Opinion - please reply by 21 June

Thank you for consulting the Environment Agency on your SEA and HRA Screening Opinion for the draft Thame Review Neighbourhood Plan.

We regret that at present, the Thames Area Sustainable Places team is unable to review this consultation. This is due to resourcing issues within the team, a high development management workload and an increasing volume of neighbourhood planning consultations. We have had to prioritise our limited resource, and must focus on influencing plans where the environmental risks and opportunities are highest. For the purposes of neighbourhood planning, we have assessed those authorities who have "up to date" local plans (plans adopted since 2012, or which have been confirmed as being compliant with the National Planning Policy Framework) as being of lower risk. At this time, therefore, we are unable to make any detailed input on neighbourhood plans being prepared within this local authority area.

However, together with Natural England, English Heritage and Forestry Commission, we have published joint guidance on neighbourhood planning, which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at:

http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf

Kind regards,

[REDACTED]
Planning Advisor - Thames Sustainable Places Team
Environment Agency | Red Kite House, Wallingford, OX10 8BD
Planning_THM@environment-agency.gov.uk