



**Longwick-cum-Ilmer Neighbourhood Plan**  
**Strategic Environmental Assessment**  
**Screening Opinion**  
**Prepared by Wycombe District Council**

**Updated May 2017**

## 1. Introduction

Strategic Environmental Assessment (SEA) is a way of ensuring the environmental implications of decisions are taken into account before any such decisions are made. The need for environmental assessment of plans and programmes is set out in the European Directive 2001/42/EC, known as the SEA Directive. Under this Directive, Neighbourhood Plans may require SEA but this will depend on the content of each Neighbourhood Plan.

The purpose of the Longwick-cum-Ilmer Neighbourhood Plan (LcINP) is to establish planning policies for the development and use of land within the parish of Longwick-cum-Ilmer. The LcINP will cover the whole of the Parish. In the case of Longwick, it is expected that the Neighbourhood Plan (NP) will be allocating sites for development.

Wycombe District Council (WDC) is legally required to determine whether the LcINP will require SEA. However, if it is concluded that an SEA is required, Longwick Parish Council, supported by its Steering Group, are responsible for its production and it must form part of the material that is consulted on once the formal consultation stage is reached. The SEA Directive makes SEA a mandatory requirement for:

- a) Plans which are prepared for town and country planning or land use and which set the framework for future development consent of projects listed in the Environmental Impact Assessment (EIA) Directive; or
- b) Plans which have been determined to require an assessment under the Habitats Directive.

However, the main determining factor as to whether SEA is required on a Neighbourhood Plan is if it is likely to have a significant effect on the environment. Neighbourhood Plans containing land allocations for development that are not included in the local authority's plan, are likely to require SEA. Neighbourhood Plans which do not contain such allocations (or simply reflect allocations already identified as part of a local authority plan) are less likely to require SEA.

If SEA is required, the Parish Council may wish to consider voluntarily expanding the scope so that it covers wider economic and social issues. This is the approach taken by Wycombe District Council, whereby SEA is included within the broader Sustainability Appraisal of plans. The advantage of undertaking a Sustainability Appraisal is that it can demonstrate the impact of the Neighbourhood Plan on social, economic and environmental factors and therefore demonstrate to an examiner that the Plan that has been prepared is the most sustainable compared with any reasonable alternatives.

## **2. History of the LcINP**

The Parish Council submitted their original NDP for examination in late 2015. The examiner made a number of recommendations, which, in the opinion of WDC, would have amounted to unsustainable development. The Parish Council subsequently withdrew their NDP. They have reviewed the content and are now proposing a greater level of development than the original plan – around 300 homes as opposed to the original 160. Since the substantive change to the Plan is to increase the level of development proposed, but still within the main settlement of Longwick village, the conclusion of this screening opinion is unchanged therefore it does not propose to re-consult with the SA bodies.

## **3. Legislative background**

The legislation pertaining to Strategic Environmental Assessments and Sustainability Appraisal is European Directive 2001/42/EC. This was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, commonly referred to as the SEA Regulations. The Government published 'A Practical Guide to the Strategic Environmental Assessment Directive' (ODPM 2005), which provides more detailed guidance on how an SEA should be carried out.

The Planning and Compulsory Purchase Act 2004 also requires that a Sustainability Appraisals (SA) is prepared for all spatial plans. It is considered best practice to incorporate requirements of the SEA Directive into an SA.

The Government has stated that Sustainability Appraisal is not needed for Neighbourhood Development Plans (NDPs), but has said that it must be demonstrated how the NDP contributes to the achievement of sustainable development in the area.

Schedule 2 of the Neighbourhood Planning (General) Regulations 2012 refers to the Habitats Directive. The Directive requires that any plan or project likely to have a significant effect on a European site must be subject to an appropriate assessment. Paragraphs 2 – 5 of Schedule 2 amend the Conservation of Habitats and Species Regulations 2010 so that its provisions apply to Neighbourhood Development Orders (NDOs) and NDPs. The regulations do state that the making of an NDP is not likely to have a significant effect on a site designated at European level for its biodiversity, however, this needs to be ascertained and this can be done at the time the screening opinion is being sought.

This report focuses on screening for SEA and the criteria for establishing whether a full assessment is needed.

## **4. Screening process**

The screening opinion assessment is undertaken in two parts: the first part will assess whether the plan requires SEA (as per the flow chart which follows); and the

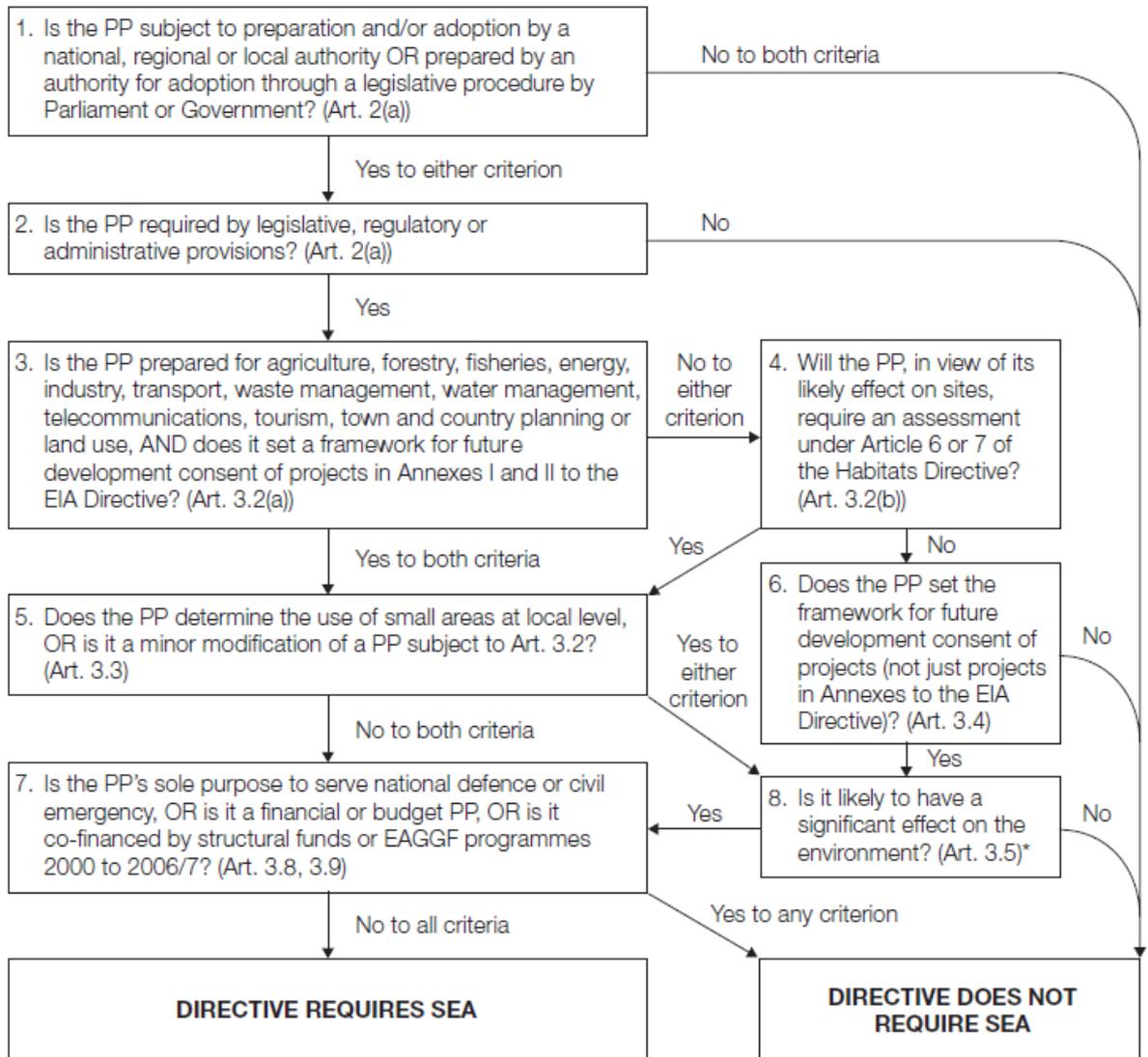
second part of the assessment will consider whether the Neighbourhood Plan is likely to have a significant effect on the environment, using criteria drawn from Schedule 1 of the EU SEA Directive and the UK Environmental Assessment of Plans and Programmes Regulations 2004 (see section 5).

The three statutory consultation bodies (Historic England, Environment Agency and Natural England) were consulted in 2015 to determine whether they agree with the conclusion of this screening opinion, in establishing whether the LcINP requires SEA and whether it may have a 'significant environmental effect'. An SEA/SA Scoping Report exercise accompanied the opinion so as to streamline the process.

The government guidance 'A practical guide to the Strategic Environmental Assessment Directive' sets out the following approach to be taken in determining whether SEA is required:

**Figure 2 – Application of the SEA Directive to plans and programmes**

This diagram is intended as a guide to the criteria for application of the Directive to plans and programmes (PPs). It has no legal status.



\*The Directive requires Member States to determine whether plans or programmes in this category are likely to have significant environmental effects. These determinations may be made on a case by case basis and/or by specifying types of plan or programme.

The table in Section 5 below sets out the reasoning for whether the LcINP will require a full SEA. The questions in that table are drawn from the diagram above which sets out how the SEA Directive should be applied.

## 5. Screening Summary

### Summary of the Neighbourhood Plan

Details of the Neighbourhood Plan	
Name of plan	Longwick-cum-Ilmer Neighbourhood Plan
Geographic coverage of plan	The Parish of Longwick-cum-Ilmer
Key topics/ scope of plan	Seeking to allocate a number of small residential sites to accommodate growth of up to 300 homes.
Key issues	Surface water / ground water flooding and drainage; Existing infrastructure capacity; Transport sustainability and access to services; Ageing population; Housing availability / affordability.

### Summary of screening opinion

Local Authority details	
Officer preparing screening opinion	Rosie Brake, Planning Policy Officer
Date of assessment	February 2015 and reviewed May 2017
Reason for conclusion	The Neighbourhood Plan is likely to allocate a number of sites for future development which could have a significant effect on the environment. Therefore SEA is required.

## 6. Screening Assessment

### Assessment 1: Establishing the need for SEA

Stage	Y/N	Reason
1. Is the Neighbourhood Plan (NP) 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))	Y	The preparation and adoption of the NP is allowed under the Town and Country Planning Act 1990 as amended by the Localism Act 2011. The NP will be prepared by the Parish Council (as the 'qualifying body') and will be 'made' by Wycombe District Council as the local authority. The preparation of NPs is subject to the following regulations: The Neighbourhood Planning (General) Regulations 2012 and The Neighbourhood Planning (referendums) Regulations 2012. <b>GO TO STAGE 2</b>
2. Is the NP required by legislative, regulatory or administrative provisions? (Art. 2(a))	Y	Although the NP is not a requirement and is optional under the provisions of the Town and Country Planning Act as amended by the Localism Act 2011, it will, if 'made', form part of

		<p>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> <p><b>GO TO STAGE 3</b></p>
<p>3. Is the NP 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 to the EIA Directive? (Art 3.2(a))</p>	<p><b>Y</b></p>	<p>The NP is being prepared for town and country planning and land use as it proposes to allocate sites for development e.g. housing or employment uses. As such, the NP contains a framework for future development consent of urban development projects (listed as 10(b) in Annex II of the EIA Directive).</p> <p><b>GO TO STAGE 5</b></p>
<p>4. Will the NP, 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))</p>		<p><b>NOT APPLICABLE</b></p>
<p>5. Does the NP Determine the use of small areas at local level, OR is it a minor modification of a plan or programme subject to Art. 3.2? (Art. 3.3)</p>	<p><b>Y</b></p>	<p>The NP is expected to determine the use of small sites at a local level.</p> <p><b>GO TO STAGE 8</b></p>
<p>6. Does the NP set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3.4)</p>		<p><b>NOT APPLICABLE</b></p>
<p>7. Is the NP's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget plan or programme, OR is it co-financed by structural</p>	<p><b>N</b></p>	<p>The NP does not fall into any of the criteria listed.</p> <p><b>DIRECTIVE REQUIRES SEA</b></p>

funds or EAGGF programmes 2000 to 2006/7? (Art 3.8, 3.9)		
8. Is it likely to have a significant effect on the environment? (Art. 3.5)	<b>Y</b>	See Assessment 2: Likely significant effects on the environment. <b>GO TO STAGE 7</b>

Assessment 2: Likely significant effects on the environment (Stage 8)

<b>SEA Directive criteria and Schedule 1 of the Environmental Assessment of plans and Programmes Regulations 2004</b>	<b>Wycombe District Council assessment</b>	<b>Likely significant environmental effect?</b>
Characteristics of the Neighbourhood Plan, having regard to:		
(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	The LcINP will, if 'made' by Wycombe District Council, form part of the statutory Development Plan. As such, it will contribute to the framework for the development consent of projects. The LcINP is expected to set out the location, nature and size of development sites (e.g. housing, employment and leisure) in the Parish.	<b>Y</b>
(b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy	The NP will be in conformity with the National Planning Policy Framework. The policies within the NP should also be in general conformity with the Council's existing strategic policies. WDC will share evidence and work collaboratively with the Parish Council to align the Neighbourhood Plan with work on the emerging new Local Plan, and emerging plan for Princes Risborough. The NP should not significantly influence other plans and programmes, but may have a limited degree of influence over the formation of future strategic policies.	<b>N</b>
(c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development	The NP is expected to work to protect and enhance the natural environment of the area, and seek to integrate environmental considerations. To this end, a Sustainability Appraisal will be prepared, although not formally required by legislation, to demonstrate how the plan has integrated these issues.	<b>Y</b>

(d) environmental problems relevant to the plan or programme	The preparation of the NP will need to consider the impact of proposals on designated sites, wider biodiversity, flood risk and heritage assets.	<b>Y</b>
(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).	The NP is not directly relevant to the implementation of European legislation, though it will need to take the impact of the Water Framework Directive into account.	<b>N</b>
<b>SEA Directive criteria and Schedule 2 of Environmental Assessment of plans and programmes Regulations 2004</b>	<b>Wycombe District Council assessment</b>	<b>Likely significant environmental effect?</b>
Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:		
(a) the probability, duration, frequency and reversibility of the effects	The NP is likely to have short-term effects resulting from activity associated with the development of allocated sites. There may also be longer-term effects relevant to changes in land-use but this will depend on the proposals within the Neighbourhood Plan. It is very unlikely that these will have any significant irreversible damaging environmental impacts.	<b>Y</b>
(b) the cumulative nature of the effects of the plan	The LciNP will be allocating a number of sites for development. The number of sites being proposed will mean that there are cumulative effects, which could be positive or negative. Any impact is likely to be local in nature.	<b>Y</b>
(c) the transboundary nature of the effects	There are no transboundary effects of the NP with other European states. However, there may be some interaction with the emerging Plan for Princes Risborough and this will be managed by liaison between the Parish, Town and District Councils.	<b>N</b>
(d) the risks to human health or the environment (for example, due to accidents)	There are unlikely to be risks to human health or the environment as a result of the NP. However, there is an existing risk to human health in the unreliable operation of the sewage	<b>N</b>

	pumping station in the north of the village.	
(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	The NP covers the parish of Longwick-cum-Ilmer, which has a population of 1366 (2011) and an area of 1228 hectares.	<b>Y</b>
(f) the value and vulnerability of the area likely to be affected due to: (i) special natural characteristics or cultural heritage	Until the location and scale of development in the parish are set out, it is not possible to properly assess the effects on natural characteristics or cultural heritage. The Parish is rural in character, including some natural habitats and heritage assets such as listed buildings, so development is likely to have impacts on the environment.	<b>Y</b>
(f) the value and vulnerability of the area likely to be affected due to: (ii) exceeded environmental quality standards or limit values	The NP is not expected to exceed environmental limits.	<b>N</b>
(f) the value and vulnerability of the area likely to be affected due to: (iii) intensive landuse	Any site allocations are expected to make the best and most efficient use of land, though this will be moderated by any need to mitigate surface water flooding by decreasing housing density. Therefore intensive landuse should not be an issue.	<b>N</b>
(g) the effects on areas or landscapes which have a recognised national, Community or international protection status	Parts of the parish, including Longwick village, are visible from the Chilterns AONB. The NP, by way of allocating sites for development, could have an impact on views from the escarpment. However, other policies in the Development Plan should lead to avoidance or mitigation of any significant impact on views.	<b>Y</b>
Assessment under Stage 8	The LcINP is likely to have a significant effect on the environment as a result of the allocation of sites for development.	

## 7. Consultation

In accordance with the Environmental Assessment of Plans and Programmes Regulations 2004, the consultations bodies (Environment Agency, English Heritage

and Natural England) were consulted on this opinion. An SEA/SA Scoping Report was also consulted on. This screening and the scoping report were updated to take account of any comments and changes. Their full responses are also attached as an appendix to this opinion.

## **8. Screening conclusion**

As a result of the Screening Assessment, it is concluded that there is the potential for significant environmental effects to arise as a result of the proposed LcINP. As such, the LcINP does require a full SEA to be undertaken. However, it is important to remember that this screening opinion is a 'snapshot in time' and that if the issues addressed in the Neighbourhood Plan should change then a new screening process will need to be undertaken to determine whether an SEA will be required.

WDC also advises that the Neighbourhood Plan should prepare a Sustainability Appraisal in order to comply with the Government's requirement that the NP demonstrate how it contributes to the achievement of sustainable development in their area. This appraisal should take a 'light-touch' proportionate approach to the Neighbourhood Plan. The approach is framed to enable SEA to be incorporated, as good practice now recommends. It is therefore recommended that the NP steering group prepare its SA (incorporating SEA) as advocated by the Council, giving special consideration to the aspects outlined in the assessment above: namely, the impacts on flood risk and visual impact.

This conclusion has been reached based on the following:

- The Screening Opinion Assessments demonstrate that SEA is necessary;
- As a precautionary measure to ensure that the SEA Directive is met, if any element of the Screening Opinion Assessments is disagreed with;
- To ensure that all site options are considered against environmental factors to ensure that the most suitable sites, in environmental terms, are delivered;
- To provide evidence and justification that the LcINP has been prepared with sustainability at the forefront of its preparation, a key consideration in the National Planning Policy Framework.

## **Appendix A: responses from the SA bodies**

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**From:** Small, Martin <Martin.Small@HistoricEngland.org.uk>  
**Sent:** 24 April 2015 15:14  
**To:** Rosie Brake  
**Subject:** RE: SEA draft screening opinion and draft SA framework for Longwick-cum-Ilmer Neighbourhood Plan

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Rosie,

I'm sorry, I have taken rather longer to get back to you than I intended. There does seem to be some confusion as the National Heritage List for England, and the list entry, both have the SAM as being partly within Longwick-cum-Ilmer parish, but the map and our own GIS both show the boundary of the scheduled area as being contiguous with the parish boundary, but not crossing it. I think we have to go with the map and therefore agree that the SAM is outside the parish. Nevertheless, being immediately adjacent to the parish boundary it should warrant a mention in the Plan.

Many thanks,

Martin

Martin Small | Principal Adviser, Historic Environment Planning  
(Bucks, Oxon, Berks, Hants, IoW, South Downs and Chichester)  
Direct Line: 01483 252040 | Mobile 07879 435867  
English Heritage | South East | Eastgate Court  
195-205 High Street | Guildford | GU1 3EH

[www.english-heritage.org.uk](http://www.english-heritage.org.uk)

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**From:** Rosie Brake [Rosie.Brake@wycombe.gov.uk]  
**Sent:** 07 April 2015 11:20  
**To:** Small, Martin  
**Subject:** RE: SEA draft screening opinion and draft SA framework for Longwick-cum-Ilmer Neighbourhood Plan

Dear Martin,

I am just running through each of your comments and wanted to check your point about Waldrige Manor – I think the site you are referring to is just outside the parish boundary, in a parish of Aylesbury Vale, which is why it is not showing up in our maps here. If this is the case, could you advise me on the extent of the setting of the SAM, so that I can understand whether the NDP should acknowledge the site?

Many thanks

**Rosie Brake**  
Planning Policy Officer  
Wycombe District Council  
Queen Victoria Road  
HIGH WYCOMBE HP11 1BB  
01494 421581

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**From:** Small, Martin [mailto:Martin.Small@HistoricEngland.org.uk]  
**Sent:** 02 April 2015 22:20  
**To:** Rosie Brake  
**Subject:** RE: SEA draft screening opinion and draft SA framework for Longwick-cum-Ilmer Neighbourhood Plan

Dear Rosie,

Thank you for your e-mail of 20<sup>th</sup> March consulting Historic England on your Council's Screening Opinion and Scoping Report for the SEA of the Longwick-cum-Ilmer Neighbourhood Plan. Please find attached our response (please note, this is being sent by e-mail only).

Thank you.

Kind regards,

Martin

Martin Small | Principal Adviser, Historic Environment Planning  
(Bucks, Oxon, Berks, Hants, IoW, South Downs and Chichester)  
Direct Line: 01483 252040 | Mobile 07879 435867  
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**From:** Rosie Brake [Rosie.Brake@wycombe.gov.uk]  
**Sent:** 20 March 2015 11:08  
**To:** Small, Martin  
**Cc:** Graham Walters (via Google Drive) ([lciparishnp@gmail.com](mailto:lciparishnp@gmail.com))  
**Subject:** SEA draft screening opinion and draft SA framework for Longwick-cum-Ilmer Neighbourhood Plan

Dear Martin,

The Neighbourhood Area for the parish of Longwick-cum-Ilmer has been approved by WDC, and the Parish Council are progressing with preparing the plan. Accordingly WDC have set out an SEA screening opinion for the plan (attached for your comment). Because it is expected that the plan will allocate sites for around 130 homes, the opinion concludes that SEA is required.

WDC recommend that the SEA process is incorporated into a 'light touch' Sustainability Appraisal, so I therefore also attach a draft SA framework for your consideration and comment.

Kind regards

**Rosie Brake**  
Planning Policy Officer  
Wycombe District Council  
Queen Victoria Road  
HIGH WYCOMBE HP11 1BB  
01494 421581

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Ms Rosie Brake  
Planning Policy Officer  
Wycombe District Council  
Queen Victoria Road  
HIGH WYCOMBE, HP11 1BB

Our ref: HD/P5136/02/PC6  
Your ref:  
Telephone 01483 252040  
Fax

2<sup>nd</sup> April 2015

Dear Rosie,

### **Longwick-cum-Ilmer Neighbourhood Plan SEA Screening Opinion and Scoping Report**

Thank you for your e-mail of 20<sup>th</sup> March consulting Historic England on your Council's Screening Opinion and Scoping Report for the SEA of the Longwick-cum-Ilmer Neighbourhood Plan.

Having reviewed the Council's Opinion, we concur with the Council's conclusion that an SEA is required for the Longwick-cum-Ilmer Neighbourhood Plan.

Turning to the Scoping Report, general advice on Sustainability Appraisal and the historic environment is set out in English Heritage's publication "Strategic Environmental Assessment, Sustainability Appraisal and The Historic Environment" (<http://www.english-heritage.org.uk/publications/strategic-environ-assessment-sustainability-appraisal-historic-environment/>).

We welcome the identification of the Buckinghamshire and Milton Keynes Historic Landscape Characterisation under "Context Review of Other Plans and Programmes". We also welcome the identification of Historic England's Heritage at Risk Register and the Buckinghamshire Historic Environment Record under "Review of Baseline Information". The map of environmental constraints on page 12 is useful.

In Table 3 it could be noted that there are 35 listing entries on the National Heritage List for England for the parish, including three grade II\* buildings, and one scheduled ancient monument – the nucleated medieval settlement east of Waldrige Manor (which information is currently buried in Appendix C, although this erroneously states that there are no scheduled ancient monuments in the parish).

Why and when were the Conservation Areas designated ? Are there any Character Appraisals of the Conservation Areas ? If not, then this should be identified as a gap in the baseline (and could form the basis of a community project). What does the Historic Environment Record and the Buckinghamshire and Milton Keynes Historic Landscape Characterisation have to say about the parish ?

Cont'd

In Table 4, the number of heritage assets in the parish is not, in itself, an issue. The possible deterioration in the condition of these assets, or threats to their significance through inappropriate development, would be issues. Although none of the three grade II\* listed buildings nor the Scheduled Ancient Monument are on the 2014 Heritage at Risk Register, has any survey been undertaken of the condition of the grade II listed buildings in the parish ? If there are Conservation Area Character Appraisals, have they identified any threats to the special interest of the Areas ?

We generally welcome SA Objective 3 in Table 5 and its associated Appraisal criteria and indicators, although we are not clear why (other than, perhaps, to avoid repetition) the first four Appraisal criteria do not all say “conserve and enhance”, which is our preferred wording. “Listed buildings” is not an indicator – should that be “Number of listed buildings” ? . Whilst we welcome the intention behind the desire to increase the number of locally-listed assets, would the failure to increase the number really be a reflection on the performance of the Plan’s policies and proposals ? Perhaps a better indicator would be “up-to-date and regularly reviewed list of locally-important assets” ?

We also welcome SA Objective 10.

In paragraph 7.5, it might be helpful if the comments provided to justify the assessment of effects were actually in relation to each and every indicator; the colour-coding would represent an overall summary of effects.

We welcome the reference to the English Heritage advice on “Heritage in Local Plans: how to create a sound plan under the NPPF” in Appendix B. However, this has recently been republished as “Historic Environment Good Practice Advice in Planning Note 1: The Historic Environment in Local Plans”

(<http://www.historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/>).

Reference could also be made to the Historic England advice on Neighbourhood Planning (<http://www.historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>).

We hope these comments are helpful, but please contact me if you have any queries.

Thank you again for consulting Historic England.

Yours sincerely,



Martin Small

Principal Adviser, Historic Environment Planning  
(Bucks, Oxon, Berks, Hampshire, IoW, South Downs National Park and Chichester)

E-mail: [martin.small@historicengland.org.uk](mailto:martin.small@historicengland.org.uk)



Date: 01 April 2015  
Our ref: 148745  
Your ref: SEA draft scoping report for Longwick-cum-Ilmer NP



Rosie Brake  
**BY EMAIL ONLY**

Customer Services  
Hornbeam House  
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Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

Dear Rosie Brake

**Planning consultation:** SEA/SA draft scoping report  
**Location:** Longwick-cum-Ilmer

Thank you for your consultation on the above dated 20 March 2015 which was received by Natural England on the same date.

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.

**WILDLIFE AND COUNTRYSIDE ACT 1981 (AS AMENDED)  
THE NATIONAL PARKS AND ACCESS TO THE COUNTRYSIDE ACT (1949)**

Natural England has the following comments:

Table 5

- *SA Objective 1.* Whilst we welcome the SA objective to conserve and enhance biodiversity, we would recommend that there could be further indicators used. This could include incorporating suitable biodiversity measures in and around developments and the parish, which complement the existing habitats and species present in the area, as outlined in the Buckinghamshire and Milton Keynes Biodiversity Action Plan. For example the indicator could be an increase in a particular habitat found in the parish.
- *SA Objective 2.* The lack of street lights was highlighted as a positive in the public consultation workshop, and the dark night skies of the AONB and its setting should also be conserved (as set out in the Chilterns Conservation Board Position Statement on Development affecting the setting of the Chilterns AONB). Another indicator for this objective could therefore be the protection of the dark skies in the parish.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Charlotte Frizzell on 07824 597885, or [charlotte.frizzell@naturalengland.org.uk](mailto:charlotte.frizzell@naturalengland.org.uk). For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.



Yours sincerely

Charlotte Frizzell  
Lead Adviser  
Sustainable Development and Regulation  
Thames Valley Team



Ms Rosie Brake  
Wycombe District Council  
Planning, Transport & Development  
Council Offices  
Queen Victoria Road  
High Wycombe  
Buckinghamshire  
HP11 1BB

**Our ref:** WA/2006/000248/OR-  
09/PO1-L01  
**Your ref:**  
**Date:** 23 April 2015

Dear Ms R. Brake

**Strategic Environmental Assessment Screening Opinion and  
Sustainability Appraisal/Strategic Environmental Assessment:  
Longwick cum Ilmer Neighbourhood Plan Scoping Report. March 2015.**

Thank you for the opportunity to comment on the above documents.

**Screening Opinion**

The Screening Opinion document says that the Longwick cum Ilmer Neighbourhood Plan is likely to allocate a number of sites for future development which could have a significant effect on the environment. It concludes that an SEA is required. We would agree with this conclusion as the allocations in the neighbourhood plan are likely to have an impact on environmental constraints. These constraints are detailed below.

Based on the location map for Longwick cum Ilmer Parish: Planning Policies and Constraints on page 12 of the submitted SA document there are 7 named main rivers in this parish. They are:

- Ilmer Lower Ditch
- Longwick Brook
- Stockwell brook
- Meadle Brook
- Ilmer Upper Ditch
- Kingsey Cuttle Brook
- Horsenden Stream

The impacts from any development on the water quality, ecology, river impoundments, and any water abstractions on the above rivers will need to be considered in the sustainability appraisal for these rivers.

Surface water and groundwater flooding may also be impacted on significantly by

Cont/d..



increasing development and hardstanding.

The redevelopment of contaminated sites may also prove to be significant in terms of groundwater quality.

### **Sustainability Appraisal: Scoping report**

In general we are pleased with and support many of the aspects of the Sustainability Appraisal/Strategic Environmental Assessment: Longwick cum Ilmer Neighbourhood Plan Scoping Report. We support the decisions you have made to take proportionate approach to the sustainability appraisal. However there are some points that have been omitted or need amendments and we have set these out below under the relevant section headings.

#### Table 3: Sustainability Characteristics of Longwick cum Ilmer- Key Environmental Characteristics

Under 'Nature Conservation' we support the inclusion of Local Wildlife sites, including grassland, Longwick Green and part of Longwick Bog.

We need to see the main rivers listed above included in a section of their own so the ecological value of the river corridors are protected. This should also include other 'ordinary watercourses' that are not classified as named rivers.

We support the inclusion of the sections on water supply and water quality.

Under the 'Flooding' section fluvial flooding (from rivers) needs to be included as well as the comments on surface water and groundwater flooding which we support.

#### Table 4: Sustainability Issues in Longwick Parish- Environmental Issues

We support the inclusion of section 2 on mitigation for climate change but suggest that this should be extended to also include adaptation to climate change. This should include resistance and resilience to climate change and flooding.

We support section 5 on flooding and section 6 on water quality. However in the section on water quality it states:

*“the need to protect groundwater quality by applying restrictions which apply to development within a Source protection Zone 1 (SPZ1).”*

Please be aware that there are no source protection zones in the Longwick cum Ilmer parish. This includes SPZs, 1, 2 and 3. However, pollution prevention as an issue needs to be included in this water quality section.

In section 7 about biodiversity, we support this section but river corridors need to be included for their ecological value including the 7 main rivers as set out above.

#### Table 5 – Sustainability Framework

We are pleased with and support the appraisal criteria in the Biodiversity and Geodiversity SA/SEA Theme, Objective 1, especially the questions “Would the option improve the ecological/wildlife corridor value of rivers?” and “Would the option have the effect of creating wildlife corridors by linking existing habitats?” We suggest that you

include green infrastructure here as the improvement of ecology/wildlife corridor value of rivers would add to the green infrastructure of Longwick cum Ilmer.

We support the appraisal criteria questions in the 'water and flooding' theme. However in question 8 of the appraisal criteria which starts with 'Would the option reduce the risk to those areas susceptible to flooding?' We suggest that the wording is changed to 'susceptible from flooding from all sources.' In the SA objective column the Code for Sustainable Homes is mentioned. This has been withdrawn but we would want the optional water efficiency levels under Building Regs G2 to be used instead.

From the information submitted it is not clear if all of the potential development allocations are in flood zone 1 or not. If any site allocations are within flood zones 2 or 3 then the sequential test will need to be applied in order to be compliant with the National Planning Policy Framework paragraphs 100 and 101. You should also consider the sequential test for any allocation sites with evidence of surface or groundwater flooding. This will need to be considered in the sustainability objectives.

Please also refer to the Planning Practice Guidance for flood risk tables 1, 2 and 3 for guidance about the appropriateness for different types of development in different flood zones. Please note however that the sequential test will need to be applied before applying these tables. Tables 1-3 are set out below:

- Table 1 is titled 'Flood Risk'
- Table 2: 'Flood Risk Vulnerability Classification'
- Table 3: 'Flood Risk Vulnerability and Flood Zone 'Compatibility.'

Please use the following link to the Planning Practice Guidance  
<http://planningguidance.planningportal.gov.uk/>

We also support objective 4, and 'Best use of land including soil' theme, objective 6. Also under the Energy efficiency, climate change and waste theme, objective 5, we support the criteria appraisal questions relating to climate change.

We note that green infrastructure is included in the following question in the criteria appraisal for Objective 11 regarding access to green infrastructure, "Would the option help reduce deficiencies of open space? Would it enhance access to, local multifunctional open space, green space and green infrastructure?" This is in the Social Objectives section under "health." This should link up with the environmental appraisal criteria in the biodiversity and geodiversity objective as green infrastructure provides multiple benefits.

#### Appendices A and B: Key Plans, programmes and strategies

We support many of the included environmental plans, programmes and documents you have included in these appendices. However we advise you to consider the following within either Appendix A or B.

- Buckinghamshire Surface Water Management Plan
- Buckinghamshire Local Flood Risk Management Strategy

You may also want to check that all of the documents in Appendix B are up-to-date.

We would like to continue to work with you on the Sustainability Appraisal of the Neighbourhood Plan for Longwick cum Ilmer. If you have any queries about the issues

we raised please don't hesitate to contact me.

Yours sincerely

**Ms Michelle Kidd**  
**Planning Advisor**

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Date: 01/04/15

Our ref: 148745

Your ref: SEA draft screening opinion for Longwick-cum-Ilmer NP



Rosie Brake

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Dear Rosie Brake

**Screening consultation: SEA draft screen opinion for a Neighbourhood Plan**

**Location:** Longwick-cum-Ilmer

Thank you for your consultation on the above dated 20<sup>th</sup> March 2015 which was received by Natural England on the same date.

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**

It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests are concerned (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are likely to be significant environmental effects from the proposed plan.

**Neighbourhood Plan**

Guidance on the assessment of Neighbourhood Plans in light of the SEA Directive is contained within the National Planning Practice Guidance<sup>i</sup>. 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 have checked our records and based on the information provided, we can confirm that in our view the proposals contained within the plan will have significant effects on sensitive sites that Natural England has a statutory duty to protect. As we have no evidence of these effects having been assessed within a Local Plan, we consider that there should now be an assessment in order to determine the potential impact on these sensitive sites and what possibilities exist for the avoidance/mitigation of the effects.

The following site has been identified as being potentially significantly affected by the plan proposals:

- Chilterns Area of Outstanding Natural Beauty (AONB)

We are not aware of significant populations of protected species which are likely to be affected by the policies / proposals within the plan. It remains the case, however, that the responsible authority should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected.

Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SA/SEA is necessary.

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.

For any queries relating to the specific advice in this letter only please contact Charlotte Frizzell on 07824 597885, or [charlotte.frizzell@naturalengland.org.uk](mailto:charlotte.frizzell@naturalengland.org.uk). For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Charlotte Frizzell  
Sustainable Development and Regulation  
Thames Valley Team

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