



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

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. 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.

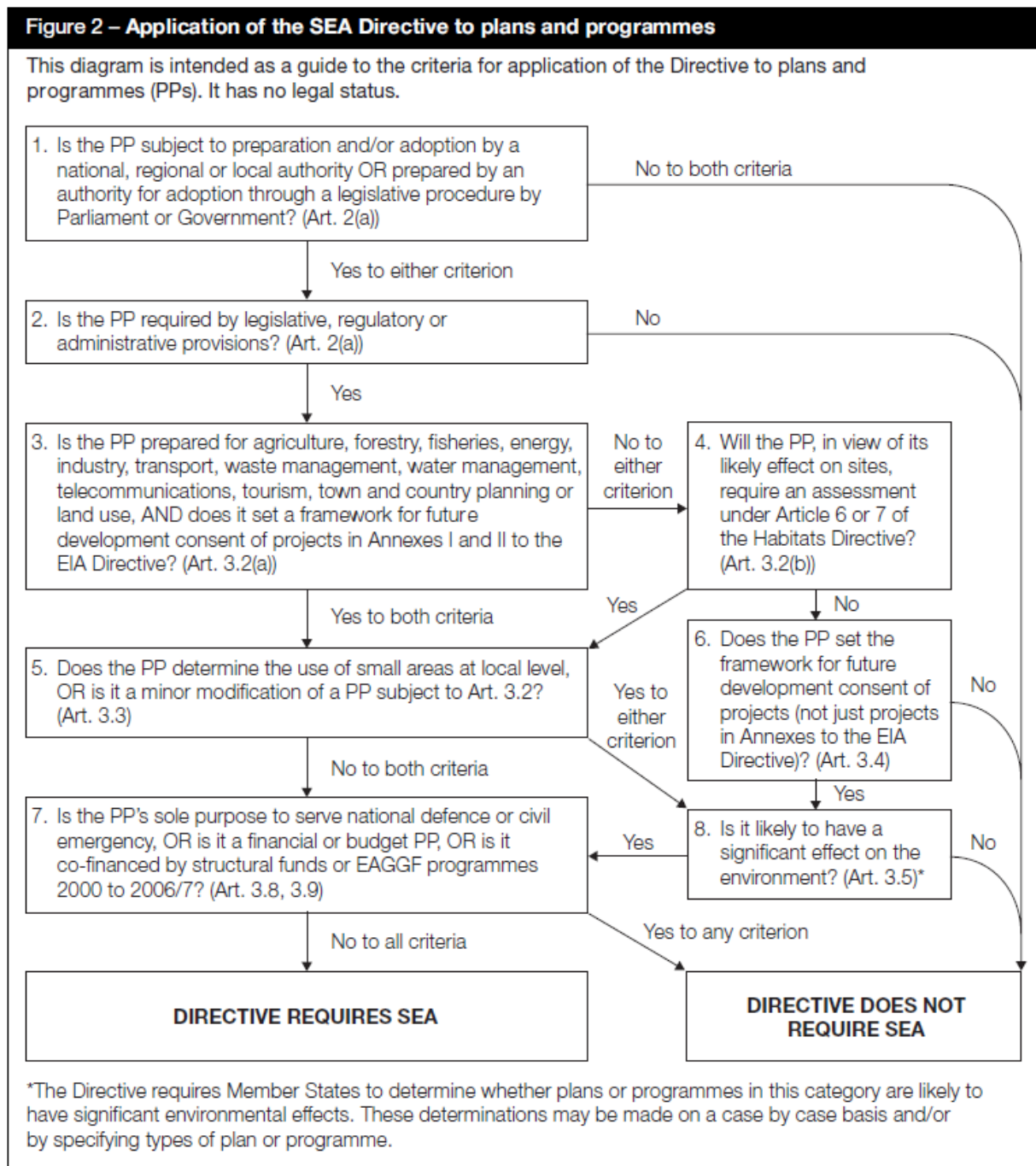
This report focuses on screening for SEA and the criteria for establishing whether a full assessment is needed.

3. 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 (English Heritage, Environment Agency and Natural England) will be consulted 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 will accompany 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:



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.

4. 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 130 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
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.

5. 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. GO TO STAGE 2
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>GO TO STAGE 3</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>Y</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>GO TO STAGE 5</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>NOT APPLICABLE</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>Y</p>	<p>The NP is expected to determine the use of small sites at a local level.</p> <p>GO TO STAGE 8</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>NOT APPLICABLE</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>N</p>	<p>The NP does not fall into any of the criteria listed.</p> <p>DIRECTIVE REQUIRES SEA</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)	Y	See Assessment 2: Likely significant effects on the environment. GO TO STAGE 7

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

SEA Directive criteria and Schedule 1 of the Environmental Assessment of plans and Programmes Regulations 2004	Wycombe District Council assessment	Likely significant environmental effect?
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.	Y
(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.	N
(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.	Y

(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.	Y
(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.	N
SEA Directive criteria and Schedule 2 of Environmental Assessment of plans and programmes Regulations 2004	Wycombe District Council assessment	Likely significant environmental effect?
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.	Y
(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.	Y
(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.	N
(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	N

	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.	Y
(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.	Y
(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.	N
(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.	N
(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.	Y
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.	

6. Consultation

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

and Natural England) will be consulted on this opinion, and their responses recorded in a future version.

7. 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.

As this screening opinion concludes that SEA is required, a draft SEA/SA Scoping Report accompanies this opinion for consultation.