

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 Brightwell-cum-Sotwell Neighbourhood Development Plan

August 2015

Introduction

1. This screening report is used to determine whether or not the contents of the emerging Brightwell-cum-Sotwell Neighbourhood Development Plan 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). These require an SEA to be undertaken on any land use plan or programme 'which sets the framework for future development consent of projects'.
2. However, there are exceptions to this requirement 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 National Planning Policy Framework, paragraph 167, advises that assessments should be proportionate and should not repeat policy assessment that has already taken place.
4. To assess whether an SEA is required a screening process must be undertaken based on a standard set of criteria. This must be subject to consultation with Historic England, the Environment Agency and Natural England. The results of the screening process must be detailed in a Screening Statement, available to the public.

Brightwell-cum-Sotwell Neighbourhood Development Plan

5. The Brightwell-cum-Sotwell Neighbourhood Development Plan will contain policies to develop between 10 – 20 homes and up to 300sq. m of employment floor space. Pending further investigations the Plan may also contain policies to develop a community owned solar energy farm and a natural burial ground.

The Screening Process

6. 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. Table 1,

in Appendix 1 sets out the criteria used for the assessment, along with an assessment of the scope of the Brightwell-cum-Sotwell Neighbourhood Development Plan against each criterion.

7. 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. This process has been set out in Table 1 and followed to ascertain whether a SEA is required for the Brightwell-cum-Sotwell Neighbourhood Development Plan.
8. 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. These two assessments feed into Table 1 and the SEA screening assessment.

Statutory Consultees

9. The initial Screening Opinion was sent to Natural England, the Environment Agency and Historic England on 24 June 2015 giving a six week consultation period. The responses in full are at Appendix 4.
10. Natural England commented that *'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.'*
11. The Environment Agency commented that *'We view the residential development that is proposed for the Brightwell-cum-Sotwell neighbourhood Development Plan as relatively minor and providing the sites are allocated in line with the adopted South Oxfordshire Core Strategy Policy then we have no issues. We would advise however, that further investigation is carried out to make sure that any allocated natural burial ground does not impact on groundwater or water quality in the area. We are thus pleased to see that you have concluded that the Neighbourhood Plan should be accompanied by an assessment that examines the environmental impacts of delivering this development. The results of the assessment should be used to determine which sites are appropriate to be allocated for this development.'*
12. Historic England commented that *'there is potential for the plan to result in significant environmental impacts and strategic environmental assessment, at this point, should remain a requirement. The potential for such impacts will become more evident as the process of developing the plan moves forward, including the identification of the most suitable sites. However, we can see a point at which careful*

choice of sites, policies and other options could reduce this potential to a point where Strategic Environmental Assessment is no longer required. As such, we would support review of the need for SEA of the plan as it moves forward and would be pleased to reconsider our opinion at such a time.'

Conclusion

13. The Brightwell-cum-Sotwell Neighbourhood Development Plan will have potential significant effects on Natura 2000 sites and, therefore, require an Appropriate Assessment.
14. The District Council will ensure that an Appropriate Assessment is prepared that assesses the Neighbourhood Development Plan proposals either as a separate assessment or as part of the emerging Local Plan 2031. The assessment will be prepared as soon as practically possible and in any event prior to the Neighbourhood Development Plan being submitted to the Council for examination.
15. The Brightwell-cum-Sotwell Neighbourhood Development Plan seeks to deliver between 10 – 20 homes and up to 300sq. m of employment floor space. Pending further investigations the Plan may also contain policies to develop a community owned solar energy farm and a natural burial ground. There is a high probability that delivering the residential and employment development, as well as the potential for a solar farm and natural burial ground will have significant effects on the environment which are not likely to be reversible, including potential effects on the North Wessex Downs Area of Outstanding Natural Beauty, which is a nationally protected landscape. On this basis the Neighbourhood Plan should be accompanied by an assessment that examines the environmental impacts of delivering these developments. The results of the assessment should be used to determine which sites are appropriate to be allocated for this development.
16. The Brightwell-cum-Sotwell Neighbourhood Development Plan will determine the use of small areas at a local level.
17. It is determined that, as a result of the screening undertaken by the Council, a Strategic Environment Assessment is required for the Brightwell-cum-Sotwell Neighbourhood Development Plan.

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

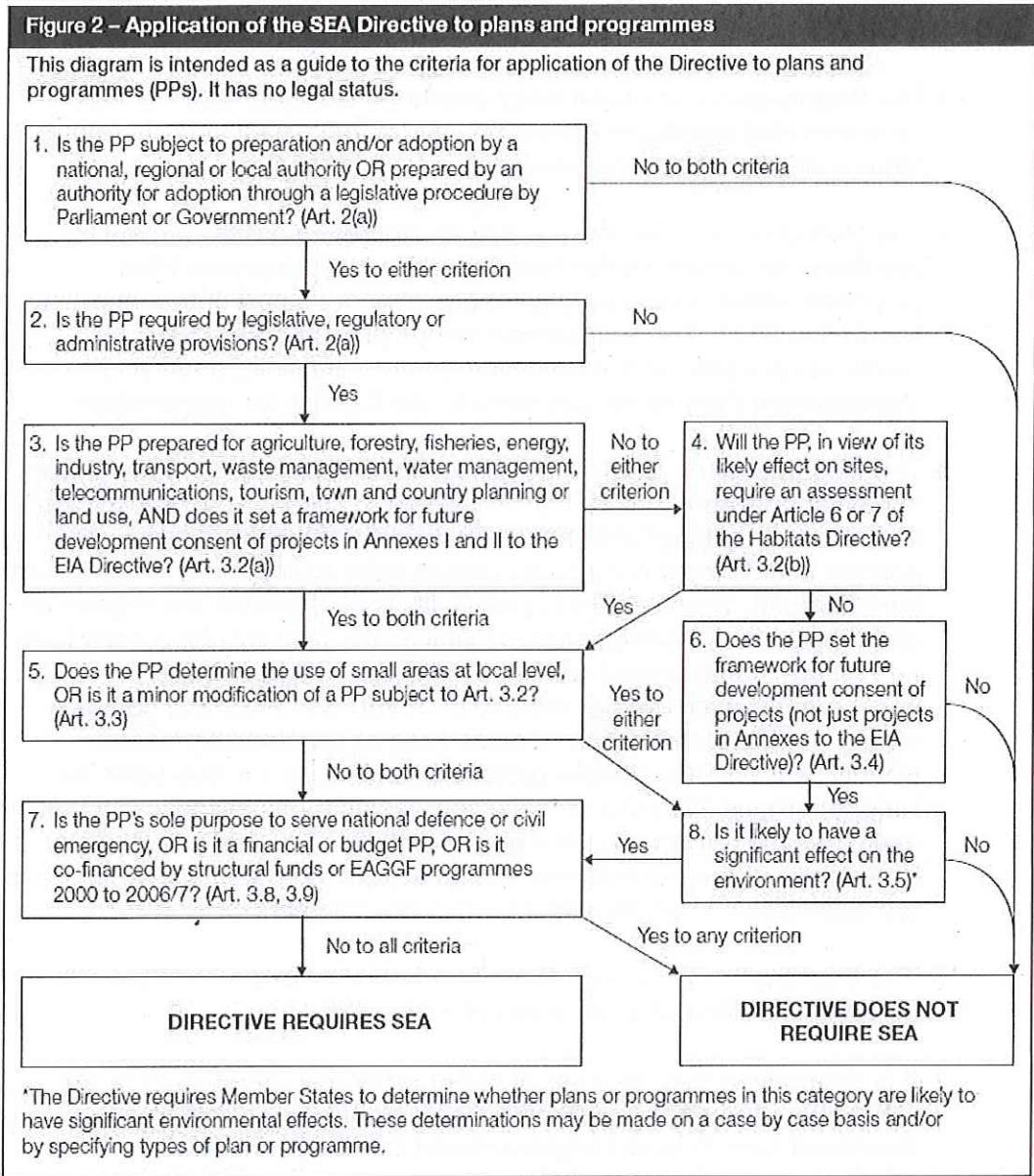


Table 1: Application of SEA Directive as shown in Appendix 1

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>	Y	<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 Brightwell-cum-Sotwell Neighbourhood Development Plan Steering Group, a working group who report to the Brightwell-cum-Sotwell Parish 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
<p>2. Is the NP required by legislative, regulatory or administrative provisions? (Art. 2(a))</p>	N	<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>
<p>3. Is the Neighbourhood Plan prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications,</p>	Y	<p>The Neighbourhood Development Plan is prepared for town and country planning and land use and will set out a framework for future development in Brightwell-cum-Sotwell, including the development of residential and employment uses, a solar energy farm and a natural burial ground which may fall under the projects referred to in Article 4(2) of the EIA Directive – listed at Annex II of the directive.</p>

<p>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))</p>		
<p>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))</p>	<p>Y</p>	<p>See Habitat Regulations Assessment (HRA) Screening Opinion for the Brightwell-cum-Sotwell Neighbourhood Development Plan in Appendix 2.</p>
<p>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)</p>	<p>Y</p>	<p>The Brightwell-cum-Sotwell Neighbourhood Development Plan will determine the use of sites/small areas at a local level.</p>
<p>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)</p>	<p>Y</p>	<p>When made, the Neighbourhood Development Plan will include a series of policies to guide development within the village and will allocate sites for specific development. This will inform the determination of planning applications providing a framework for future development consent of projects.</p>
<p>7. Is the Neighbourhood Plan's sole purpose to serve the national defence or civil</p>	<p>N</p>	<p>n/a</p>

<p>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)</p>		
<p>8. Is it likely to have a significant effect on the environment? (Art. 3.5)</p>	<p>Y</p>	<p>See assessment of the likely significance of effects on the environment in Appendix 3.</p>

Appendix 2 - Habitat Regulations Assessment (HRA) Screening Opinion for the Brightwell-cum-Sotwell Neighbourhood Development Plan

Introduction

1. The Local Authority is the "competent authority" under the Conservation of Habitats and Species Regulations 2010, 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 Appropriate Assessment of South Oxfordshire District Council's Submission Core Strategy and the Habitats Regulations Assessment for South Oxfordshire District Council (January 2015) prepared for the emerging Local Plan 2031 as its basis for assessment. From this, the Local Authority will determine whether the Brightwell-cum-Sotwell Neighbourhood Development Plan 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."

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

² The South Oxfordshire Core Strategy (December 2012) and the South Oxfordshire Local Plan 2011 (January 2006).

Assessment

4. There are six Special Areas of Conservation (SACs) considered to be within influencing distance³ of the Brightwell-cum-Sotwell Neighbourhood Development Plan. These are as follows:

Within South Oxfordshire

- Little Wittenham SAC
- Hartslock Wood SAC
- Chilterns Beechwoods SAC
- Aston Rowant SAC

Outside of South Oxfordshire

- Cothill Fen SAC (Vale of White Horse)
 - Oxford Meadows SAC (Oxford City)
5. The Screening Assessment of South Oxfordshire District Council's Submission Core Strategy could not rule out likely significant effects on any of these six SACs so an Appropriate Assessment was prepared.
 6. The Appropriate Assessment of the Council's Submission Core Strategy concluded that none of the above European sites would be significantly affected by the proposals in the Core Strategy either alone or in combination with other plans and policies. However, the scale and type of development to be promoted through the Neighbourhood Development Plan, particularly the potential for a solar farm and natural burial ground, is not directly comparable to the proposals within the Core Strategy and, therefore, the impact of this type of development has not been assessed by the Appropriate Assessment of South Oxfordshire District Council's Submission Core Strategy. Subsequently the Brightwell-cum-Sotwell Neighbourhood Development Plan will require an appropriate assessment.

Conclusion

18. The Brightwell-cum-Sotwell Neighbourhood Development Plan will have potential significant effects on Natura 2000 sites, therefore, an Appropriate Assessment for the Brightwell-cum-Sotwell Neighbourhood Development Plan will be required. The District Council will ensure that an Appropriate Assessment is prepared that assesses the Neighbourhood Development Plan proposals either as a separate assessment or as part of the emerging Local Plan 2031. The assessment will be prepared as soon as practically possible and in any

³ 17 km – see paragraph 2.2 of the Appropriate Assessment of South Oxfordshire District Council's Submission Core Strategy (December 2012).

event prior to the Neighbourhood Development Plan being submitted to the Council for examination.

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

1. Characteristics of the 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 Brightwell-cum-Sotwell Neighbourhood Development Plan would, if adopted, form part of the Statutory Development Plan and as such does contribute to the framework for future development consent of projects. The Plan will sit within the wider framework set by the National Planning Policy Framework, the strategic policies of the South Oxfordshire Core Strategy (2012) and Local Plan 2011 (2006); and the emerging Local Plan 2031. This plan will set projects at a local scale and will have limited resource implications.
(b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;	The Brightwell-cum-Sotwell Neighbourhood Development Plan will have regard to National Policy and be in general conformity with the strategic policies of the district's development plan.
(c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;	The Brightwell-cum-Sotwell Neighbourhood Development Plan will contain policies to deliver between 10 – 20 homes and up to 300sq. m of employment floor space. Pending further investigations the Plan may also contain policies to develop a community owned solar energy farm and a natural burial ground. These policies and allocations will have regard to national policy and be in general conformity with the strategic policies of the district's development plan as required by the basic conditions. The plan will, therefore, be integrating a wide range of environmental considerations. National policy requires a presumption in favour of sustainable development, which should be seen as a golden thread through plan-making, including the Brightwell-cum-Sotwell Neighbourhood Development Plan. A basic condition of the plan/order is to contribute to the achievement of sustainable development.
(d) environmental problems relevant to the plan or programme; and	The designated area of the Brightwell-cum-Sotwell Neighbourhood Development Plan is partly within the North Wessex Downs AONB, a nationally designated landscape. The designated area of the Brightwell-cum-Sotwell Neighbourhood Development Plan also contains the following environmental

	<p>designations:</p> <ul style="list-style-type: none"> • Nature and Conservation Target Areas • Local Wildlife sites • Listed buildings • Conservation areas • Scheduled ancient monument • Flood zone <p>The policies within the Brightwell-cum-Sotwell Neighbourhood Development Plan will have the potential to affect these local environmental designations.</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).	The Brightwell-cum-Sotwell Neighbourhood Development Plan will investigate the possibility of a natural burial ground, which could have impacts on ground water.
2. 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 Brightwell-cum-Sotwell Neighbourhood Development Plan is likely to have modest but enduring environmental effects. The effects are not likely to be reversible as they relate to development. However, they will be of a local scale. The plan seeks to ensure that these effects are positive in nature.
(b) the cumulative nature of the effects;	It is intended that the positive effects will have positive cumulative benefits for the area.
(c) the transboundary nature of the effects;	The designated plan area includes the village of Brightwell-cum-Sotwell as well as the hamlets of Shillingford Hill, Mackney and Sires Hill. The effects of the Plan are unlikely to have transboundary impacts.
(d) the risks to human health or the environment (for example, due to accidents);	The impacts of a natural burial ground will need to be assessed for risks to human health and ground water.
(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);	The Brightwell-cum-Sotwell Neighbourhood Development Plan relates to the parish of Brightwell-cum-Sotwell. The magnitude and spatial extent of the effects are likely to be local in scale.
(f) the value and vulnerability of the area likely to be affected due to: (i) special natural	The main vulnerability of the area covered by the neighbourhood plan is the impact of development on the AONB. The designated area also includes listed buildings,

characteristics or cultural heritage; (ii) exceeded environmental quality standards or limit values; or (iii) intensive land-use; and	conservations areas and a scheduled ancient monument, as well as being in close proximity to the Little Wittenham SSSI and SAC.
(g) the effects on areas or landscapes which have a recognised national, Community or international protection status.	The Brightwell-cum-Sotwell Neighbourhood Development Plan has the potential to affect the North Wessex Downs AONB.

Appendix 4 – Responses from Statutory Consultees

Date: 22/07/2015

Our ref: 157655

Your ref: SEA Screening Opinion for Brightwell-cum-Sotwell NP



Rona.Knott@southandvale.gov.uk

BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business
Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Rona Knott

Screening consultation: SEA Screening Opinion

Location: Brightwell-cum-Sotwell Neighbourhood Area

Thank you for your consultation on the above dated 24/06/2015 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 Guidance¹. 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 sites have been identified as being potentially significantly affected by the plan policies/allocations/proposals:

- North Wessex Downs Area of Outstanding Natural Beauty (AONB)
- Little Wittenham Site of Special Scientific Interest (SSSI) and Special Area of Conservation (SAC)

We are aware of significant populations of protected species which are likely to be affected by the 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 charlotte.frizzell@naturalengland.org.uk or 07824 885597. For any new consultations, or to provide further information on this consultation please send your correspondences to 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

RE: SEA Screening Opinion for Brightwell-cum-Sotwell Neighbourhood Plan

Planning-Wallingford <planning-wallingford@environment-agency.gov.uk>

Fri 10/07/2015 10:31

To: Rona Knott <rona.knott@southandvale.gov.uk>;

Dear Ms Knott,

We view the residential development that is proposed for the Brightwell-cum-Sotwell Neighbourhood Development Plan as relatively minor and providing the sites are allocated in line with the adopted South Oxfordshire Core Strategy Policy then we have no issues. We would advise however, that further investigation is carried out to make sure that any allocated natural burial ground does not impact on groundwater or water quality in the area. We are thus pleased to see that you have concluded that the Neighbourhood Plan should be accompanied by an assessment that examines the environmental impacts of delivering this development. The results of the assessment should be used to determine which sites are appropriate to be allocated for this development.

Kind regards,

Jack Moeran
Planning Advisor

jack.moeran@environment-agency.gov.uk
01491 828367

Please note: The Development Management Procedure Order changed on 15 April. Responsibility for assessing surface water drainage proposals for major applications has passed to the relevant Lead Local Flood Authority (LLFA) from this date. We may still comment on surface water drainage concerning contamination or pollution prevention.

Our **flood risk standing advice** has been updated:
for local authorities <https://www.gov.uk/flood-risk-assessment-local-planning-authorities>
for developers <https://www.gov.uk/flood-risk-assessment-local-planning-authorities>

Oxfordshire Lead Local Flood Authority - sudsadoptions@oxfordshire.gov.uk

From: Rona Knott [mailto:rona.knott@southandvale.gov.uk]
Sent: 24 June 2015 16:47
To: Planning-Wallingford; consultations@naturalengland.org.uk; Robert.LloydSweet@english-heritage.org.uk
Subject: SEA Screening Opinion for Brightwell-cum-Sotwell Neighbourhood Plan

Dear Sir/Madam,

I am writing to consult you on the screening opinion for the neighbourhood development plan being prepared in South Oxfordshire at Brightwell-cum-Sotwell. Please find attached the screening opinion questionnaire, our screening opinion and the neighbourhood area designation (with map).

Our assessment of the scope of the plan using the criteria set out in the Directive and Regulations shows that it is likely to have significant effects on the environment and, therefore, requires Strategic Environmental Assessment.

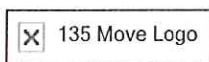
I would be grateful for any comments that you have by **6 August 2015**.

Kind regards,

Rona Knott

Planning Policy Officer | South Oxfordshire District Council

E: rona.knott@southoxon.gov.uk | T: 07717 271934 | W: www.southoxon.gov.uk/



This message has been scanned and no issues discovered.

Click [here](#) to report this email as spam

Information in this message may be confidential and may be legally privileged. If you have received this message by mistake, please notify the sender immediately, delete it and do not copy it to anyone else.

We have checked this email and its attachments for viruses. But you should still check any attachment before opening it.

We may have to make this message and any reply to it public if asked to under the Freedom of Information Act, Data Protection Act or for litigation. Email messages and attachments sent to or from any Environment Agency address may also be accessed by someone other than the sender or recipient, for business purposes.

Click [here](#) to report this email as spam



Historic England

Rona Knott
Planning Policy Officer
South Oxfordshire District Council

Rona.knott@southandvale.gov.uk
By email only

Our ref: 2015.07.16
Your ref: Brightwell-
cum-Sotwell
SEA Screening
RLS
Comments
01483 252028

Telephone
Fax

16th July 2015

Dear Rona

Brightwell-cum-Sotwell Screening opinion

Thank you for consulting Historic England on your Strategic Environmental Assessment Screening Opinion for the Brightwell-cum-Sotwell Neighbourhood Plan. In commenting on the need for SEA of the emerging plan we have taken the following considerations into account:

- The neighbourhood plan is likely to allocate sites for development within the conservation area (a designated heritage asset) and this is likely to affect its relationship with its setting including views to and from the Area of Outstanding Natural Beauty.
- The volume of development envisaged is not particularly large, but there is potential for a single development to have a considerable impact on a small conservation area, or for multiple developments to have a cumulative impact.
- The village is also a focus of listed buildings, which are also designated heritage assets, and that could, potentially, be negatively affected as a result of development. The cumulative impact of several small developments on a number of listed buildings might also be considered to result in a significant environmental impact
- We note that the Parish Council is considering the potential for renewable energy schemes, including a solar farm. Whilst we support the development of renewable energy generation to reduce our carbon footprint, larger schemes can have a significant impact on the character and appearance of designated heritage assets (including the contribution to their significance made by their settings) and a critical assessment of alternative sites considering their different potential for impacts on landscape character would



Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
Telephone 01483 25 2020 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



be appropriate to ensure any site allocation policy is robustly justified and opportunities to avoid harmful impacts pursued.

Taking these factors into consideration we feel that, at present, with regard to the areas of interest to Historic England, there is potential for the plan to result in significant environmental impacts and strategic environmental assessment, at this point, should remain a requirement. The potential for such impacts will become more evident as the process of developing the plan moves forward, including the identification of the most suitable sites. However, we can see a point at which careful choice of sites, policies and other options could reduce this potential to a point where Strategic Environmental Assessment is no longer required. As such, we would support review of the need for SEA of the plan as it moves forward and would be pleased to reconsider our opinion at such a time.

I would be grateful if you could pass the following comments on to the Parish Council regarding the scope of Historic Environment Evidence for the Neighbourhood Plan and SEA. Historic England have previously published guidance on undertaking SEA for planning documents which can be downloaded at:

<https://historicengland.org.uk/images-books/publications/strategic-environmental-assessment-sustainability-appraisal-historic-environment/> . We are currently reviewing this guidance to provide a version that is more suitable for the scope of most Neighbourhood Plans.

We would suggest that the structure provided by Strategic Environmental Assessment for assessing the impacts of options, including combinations of different options, will be useful in developing a plan that robustly meets the basic conditions. This should not necessarily involve collecting more data than is required to develop a robustly evidenced plan. Sources of evidence for the plan area's historic environment that should be useful in preparing the plan include:

- The District Council's Conservation Area Appraisal;
- The National Heritage List, which provides details of listed buildings and scheduled monuments); and
- The County Council's Historic Environment Record (HER), which records other important historic buildings, sites and archaeological remains.

The County HER also includes the Oxfordshire Historic Landscape Characterisation Study, which may also prove useful in documenting the variation in character across the plan area and the representation of different historic landscape character types. I have Appended a list of other useful sources of information to this letter which the Parish Council might also find of assistance.

Whilst this may seem like a lot of information to marshal, data gathering should be focused on understanding the potential development sites to enable assessment of their relative merits. By examining records of historic buildings, sites and archaeological remains, either within these sites or in their immediate vicinity it



Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH

Telephone 01483 25 2020 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



should be possible to develop an outline understanding of the potential of development to affect heritage assets and the character of the area and to develop policies that help to reduce potential issues.

The Parish Council might consider preparing a summary statement of significance for the conservation area based on the Council's appraisal to briefly set out what the special interest of the area is and (possibly in a series of bullet points) which features of its character and appearance are considered desirable to preserve or enhance. This should help to prepare development guidance policies that guide applicants to develop sensitive proposals and build a local dimension that adds to the District Council's existing local plan policies. Similarly a review of the issues identified in the appraisal prepared in 2006 would be helpful. Both reviews might be added to the appraisal in future to bring it up to date.

The Parish Council might find looking at a few examples of Neighbourhood Plans from elsewhere in Oxfordshire of assistance for inspiration of how the plan could help to manage impacts on local character and heritage. That for Drayton in Vale of White Horse, includes a good example of a Design Guide developed from a brief character assessment study and a list of 'Non-designated Heritage Assets' i.e. buildings and sites that do not receive by statutory protection but are nevertheless considered of local significance and meriting consideration in planning. The Watlington Neighbourhood Plan (also in South Oxfordshire) includes a brief study of views of the village from the Chilterns AONB, which may be of assistance in considering the relationship of the village with the North Wessex Downs AONB and how the plan might respond to this in its site allocations and development guidance policies.

As well as being something that we naturally wish to protect the historic environment is also a resource for our economic, social and environmental benefit. We would encourage the Parish Council to consider how harnessing the value of the area's landscape character and heritage assets can help to generate benefits in each of these areas. As such it may also be useful to look at the Historic Environment policies in the Wing Neighbourhood Plan (in Buckinghamshire), which encourage the use of heritage to support local businesses.

We hope these comments are of assistance to you and the Parish Council in moving forward with the Neighbourhood Plan and SEA. Please do not hesitate to contact us if you have any queries relating to them or if there is any further information you would like Historic England to supply.

Yours faithfully

Robert Lloyd-Sweet
Historic Places Adviser (South East England)
Historic England



Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
Telephone 01483 25 2020 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



Guildford
Tel. 01483 252028
E-mail: Robert.lloydsweet@HistoricEngland.org.uk



Historic England, Eastgate Court, 195-205 High Street, Guildford GU1 3EH
Telephone 01483 25 2020 HistoricEngland.org.uk
Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.



Appendix: Useful sources for considering character and the historic environment in Neighbourhood Planning

The National Heritage List for England: a full list with descriptions of England's listed buildings: <https://www.historicengland.org.uk/listing/the-list>

Heritage Gateway: includes local records of historic buildings and features from the County Historic Environment Record: www.heritagegateway.org.uk

Heritage Counts: facts and figures on the historic environment: <http://hc.historicengland.org.uk>

Heritage and Neighbourhood Planning: Our general guidance page on incorporating heritage into your neighbourhood plan:
<https://www.historicengland.org.uk/advice/hpg/historic-environment/neighbourhoodplanning/>

HELM (Historic Environment Local Management) provides accessible information, training and guidance to decision makers whose actions affect the historic environment. www.helm.org.uk or www.helm.org.uk/communityplanning

Heritage at Risk programme provides a picture of the health of England's built heritage alongside advice on how best to save those sites most at risk of being lost forever. <https://www.historicengland.org.uk/advice/heritage-at-risk>

Placecheck provides a method of taking the first steps in deciding how to improve an area. <http://www.placecheck.info/>

Knowing Your Place deals with the incorporation of local heritage within plans that rural communities are producing, <https://www.historicengland.org.uk/images-books/publications/knowning-your-place/>

Planning for the Environment at the Neighbourhood Level produced jointly by Historic England, Natural England, the Environment Agency and the Forestry Commission gives ideas on how to improve the local environment and sources of information. <http://publications.environment-agency.gov.uk/PDF/GEHO0212BWAZ-E-E.pdf>

Good Practice Guide for Local Heritage Listing produced by English Heritage uses good practice to support the creation and management of local heritage lists. <http://www.historicengland.org.uk/advice/planning/local-heritage/local-listing/>

Understanding Place series describes current approaches to and applications of historic characterisation in planning together with a series of case studies <https://www.historicengland.org.uk/advice/planning/understanding-historic-places/>

Oxford Character Assessment Toolkit can be used to record the features that give a settlement or part of a settlement its sense of place <http://www.oxford.gov.uk/PageRender/decP/CharacterAppraisalToolkit.htm>

Oxfordshire Historic Environment Record: The County's main record of the historic environment including details of archaeological finds as well as other historical features of the landscape including designated and non-designated heritage assets <https://www.oxfordshire.gov.uk/cms/content/historic-environment-record>

