



BLEDLOW-CUM-SAUNDERTON PARISH COUNCIL

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To:
Historic England
Natural England
Environment Agency
Wycombe District Council
Chilterns AONB Board

By email

Dear Sir or Madam

Bledlow-cum-Saunderton Neighbourhood Plan:

Sustainability Appraisal/ Strategic Environmental Assessment Scoping Letter

I set out below for your attention the proposed scope of the Sustainability Appraisal/ Strategic Environmental Assessment (SA/SEA) to accompany the forthcoming Bledlow-cum-Saunderton Neighbourhood Plan (BcSNP).

This letter and its appendices should be regarded as the Scoping Report of the BcSNP in accordance with Stage A of the provisions of the Environmental Assessment of Plans & Programmes Regulations 2004 (which implement EU Directive 2001/42).

As a statutory consultee in the Regulations you are invited to comment on this report and I would be grateful for your comments by 4th April 2016.

Background

The BcSNP is being prepared by Bledlow-cum-Saunderton Parish Council as qualifying body under the 2012 Neighbourhood Planning (General) Regulations. Plan A on the following page shows the designated neighbourhood area for this purpose. Wycombe District Council (WDC) issued its preliminary SEA screening opinion on the 20th January 2016.

The District Council has recommended that the likely intention of the BcSNP to contain policies allocating land for development is the primary reason for requiring an SEA, but that it should remain focussed on the impacts of site allocations. Regarding the environmental sensitivity of the area, part of the Neighbourhood Plan area is located within the Chiltern Hills Area of Outstanding Natural Beauty (AONB).

We are aware that there is no obligation for a Sustainability Appraisal of neighbourhood development plans but we have chosen to prepare one as a means of demonstrating how the neighbourhood plan accords with the 'basic condition' of contributing to the achievement of sustainable development (as per the 2012 Regulations).

The guidance for undertaking SA/SEA is contained in the National Planning Practice Guidance (ID 11-030), which emphasises that it must "only focus on what is needed to assess the likely significant effects of the neighbourhood plan" and on the "environmental impacts that are likely to

be significant”. It states that this “does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the neighbourhood plan”. The preliminary screening opinion by WDC reflects this guidance.



Plan A: Bledlow-cum-Saunderton Designated Neighbourhood Plan Area

The first stage of the process, the scoping of the SEA, is summarised in the text below:

The

Stage A: This stage sets the context of the assessment by identifying the baseline data and establishing the scope of the assessment.

- 1. Identification of relevant plans, policies and programmes.** Any existing requirements that need to be taken into account or incorporated into the plan are identified.
- 2. Review of baseline information.** Data about environmental, social and economic issues is collected, together with an indication as to how this may change in the future without the plan or programme under preparation.
- 3. Identification of Sustainability Issues** – the review of plans and policies, together with the baseline information are used to identify the key sustainability issues which could impact the plan;
- 4. Development of the SA Framework:** The Assessment criteria used to assess the impact of the plan or programme.
- 5. Identification of initial Plan Options:** Taking into account best practice, initial identification of options and reasonable alternatives is undertaken.
- 6. Consultation on the scope and alternatives for assessment - it is necessary to consult Statutory Consultees; Natural England, English Nature and the Environment Agency at this stage.**

SA/SEA framework will be used to assess the policy options and 'reasonable alternatives' in the neighbourhood plan. Its conclusions will inform the policy choices assessed as the most suitable by taking account of the SA/SEA and the Parish Council's views on the relative acceptability to the local community of any options, bearing in mind the need for the BcSNP to win a majority vote at a referendum

The BcSNP may contain policies as set out in the 'Policy Scope' in Appendix A, all of which will be in general conformity with the Wycombe District Council (WDC) adopted policies of its development framework - principally the 2008 Wycombe Core Strategy and 2013 Delivery & Site Allocations Plan – the 'consolidated plan' and the the provisions of the National Planning Policy Framework. It will also be guided by Chilterns AONB (CAONB) Management Plan 2014 – 2019. The consideration of these potential policies has begun but will await the conclusions of the consultation on this scoping exercise before progressing any further.

Other Plans & Programmes (Stage A1)

The BcSNP sits within a framework of other plans and programmes which provide a context for the area in which the BcSNP will have influence. It is not the intention of this scoping exercise to review every high level plan that may cover the area, rather to adopt a 'proportionate approach' as set out National Planning Guidance and consider those plans that relate most closely to the local area and are therefore of most relevance. These are identified in WDC SA/SEA Scoping Report (App B, Oct 2013) and Local Plan Background Papers.

In line with the 'basic conditions', the SA/SEA report will have regard to relevant EU obligations e.g. the Habitats, Birds and Water Framework Directives and if there is any significance of these Directives in relation to the BcSNP.

The development plan currently comprises a suite of documents adopted in Wycombe District Local Development Framework, most notably the Core Strategy, which contains the strategic

policy framework for the BcSNP. The BcSNP must be able to show that its policies are in general conformity with the strategic policies of the Wycombe development plan including the saved policies of the 2004 Local Plan. It has selected those objectives of the development plan that are considered the most relevant and informative for this purpose.

The process of policy selection will be driven by choices made on the preferred strategy and on the availability of land in relation to that strategy. On the assumption that the chosen strategy will not have any significant (negative) environmental, social or economic effects, the individual policies that comprise that strategy will also be assumed to be sustainable. The strategy and its reasonable alternative(s) will therefore be assessed; the attributes of individual sites that may be assessed will be assessed not against other available sites but against the alternatives for mitigation strategies.

Baseline Information (A2)

For the purpose of the SA/SEA, some local detailed data has been identified (see Appendix B) in relation to the proposed assessment framework (set out in A4 below). The Parish Council is mindful that it is very difficult in most cases to measure the impacts at this local scale as either the data is not reported at this scale and/or the impact is so relatively negligible that it cannot be measured. In which case, the SA/SEA framework will be used to inform judgements on the impact of the proposed policies in relation to any reasonable alternatives there may be.

Sustainability Issues (A3)

The local community accepts that some new development may be required to continue to meet the needs for local housing and the local economy. Their preference is for this to be on brownfield/previously developed land, to be mixed use where this is possible and to make better use of sensitive infill within settlements. Development should protect views to and from the CAONB and not undermine the sensitive rural character and environment of the parish. The safeguarding and enhancement of local community and social infrastructure is also a key local issue and development must seek to improve connectivity (physical and IT). In any event, development should be well located and be of a high quality design.

Appraisal Framework (A4)

In the light of the context and available data, the Parish Council proposes to establish the following framework of environmental, social and economic objectives and measures in order to identify any likely significant environmental, social and economic effects.

The proposed framework reflects the likely scope of policies in the BcSNP and selected those objectives of the SA/SEA accompanying the BcSNP that are considered the most relevant and informative for this purpose.

Should there be the need for housing site selection, the process will be informed by analysis of achievability, availability and acceptability and by an analysis of suitability. Policies and reasonable alternative options, will be informed by the proposed SA/SEA framework.

The list of SA/SEA objectives are as follows:

Objective 1: Housing

To provide an adequate supply of high quality, affordable housing with a range of size, types and tenures appropriate to local needs:

1A - Will the BcSNP improve the availability of decent, affordable housing?

1B – Will the BcSNP provide a range of housing types of various sizes and tenures?

1C – Will the BcSNP provide housing suitable for local needs?

Objective 2: Community Facilities

To ensure everyone has access to appropriate educational, leisure and community facilities:

2A - Will the BcSNP protect and sustain the provision of community facilities?

2B – Will the BcSNP improve access to education and leisure?

Objective 3: Biodiversity

To protect and enhance the quality and level of biodiversity and natural habitats within the parish and provide access to new green infrastructure.

3A - Will there be any loss to biodiversity, flora or fauna as a result of the BcSNP either directly or through habitat fragmentation?

3B - Will the BcSNP use the management of surface water to enhance water quality and biodiversity

3C – Does the BcSNP improve access to the countryside

Objective 4: Landscape and 'Villagescape'

To conserve and enhance the quality of landscape and village character in the Parish:

4A - Does the BcSNP seek to protect and enhance protected landscapes?

4B - Will development result in loss of, improvement to or deterioration of the quality of the landscape or village scape?

Objective 5: Cultural Heritage

To conserve and enhance the quality and distinctiveness of the historical and cultural environment of the parish:

5A - Does the BcSNP protect and enhance designated features of historical or cultural interest (e.g. listed buildings, archaeological sites, ancient monuments, Conservation Areas?)

5B - Are settings and views of heritage assets maintained?

Objective 6: Rural Economy

6A - Will the BcSNP support new employment related uses suited to a countryside or AONB location?

6B – Will the BcSNP support rural diversification and the needs of the local farming community?

6C – Does the BcSNP reduce the need to travel and seek to increase self-containment?

Statutory Consultation (A5)

The conclusions of this consultation will be considered by the Parish Council in finalising the SA/SEA assessment framework. That framework will then inform the formulation of the Pre Submission BcSNP and will set out and be employed in the accompanying Draft SA/SEA report. It is expected that draft BcSNP policies will be formulated and assessed against one or more reasonable alternatives to ensure any significant environmental effects have been identified and any necessary mitigation measures are included in the policies.

If you have any queries then please contact our planning consultant, Max Taylor, of RCOH Ltd at max.taylor@rcoh.co.uk or call on 0208 977 2175

We look forward to hearing from you

Yours sincerely



Julie Bunker
Parish Clerk
Bledlow-cum-Saunderton Parish Council

Enc:

Appendix A – BcS Neighbourhood Plan Vision Note

Appendix B – BcS SA/SEA Baseline Data