

Strategic Environmental Assessment (SEA) for the Thame Neighbourhood Plan 2020-35 (TNP2)

Environmental Report

June 2023

Quality information

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Revision History

Revision	Date	Details	Name	Position
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Prepared for:

Thame Town Council and on behalf of Locality

Prepared by:

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Non-technical summary

AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Thame Neighbourhood Plan 2020-35 (TNP2).

The TNP2 is being prepared by Thame Town Council in the context of the South Oxfordshire Local Plan, which was adopted in 2020. Once 'made' the TNP2 will supersede the current Thame Neighbourhood Plan (TNP) and will have material weight when deciding on planning applications, alongside the Local Plan.

SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects. Central to the SEA process is publication of an Environmental Report alongside the draft plan that presents certain required information. The aim is to inform the consultation and, in turn, plan finalisation.

Preparing the Environmental Report essentially involves answering three questions:

1) What has plan-making / SEA involved **up to this point?**

- including in relation to 'reasonable alternatives'.

2) What are the SEA findings **at this stage?**

- i.e. in relation to the draft plan.

3) What happens **next**

This Environmental Report / NTS

This is the Non-Technical Summary (NTS) of the Environmental Report for the TNP2.

Both this NTS and the main report are structured so as to answer the three questions introduced above in turn. Firstly, there is a need to set the scene by answering: *What's the scope of the SEA?*

What is the scope of the SEA?

The scope of the SEA is reflected in a list of topics and objectives, which, taken together indicate the parameters of the SEA and provide a methodological 'framework' for assessment. The following topics form the core of the framework:

- Biodiversity and geodiversity
- Climate change
- Health and wellbeing
- Historic environment
- Landscape
- Land, soil, and water resources
- Population and communities
- Transportation and movement

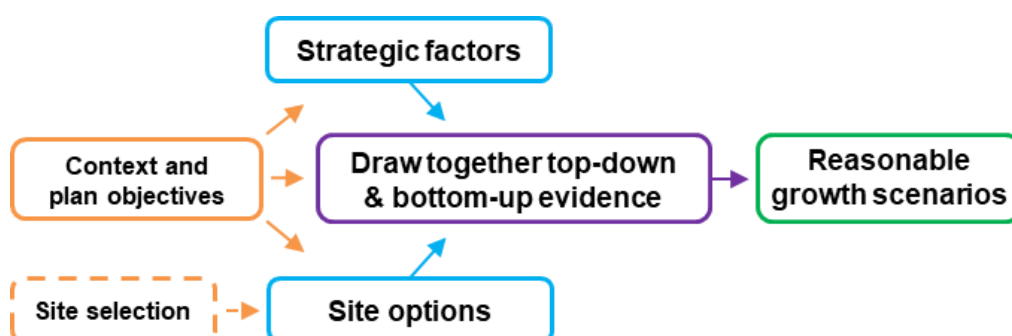
Plan making/SEA up to this point

An important element of the required SEA process involves assessing **reasonable alternatives** in time to inform development of the draft plan, and then publishing assessment findings in the Environmental Report.

As such, Part 1 of this report explains how work was undertaken to develop and assess a 'reasonable' range of alternative approaches to allocating one or more sites through the TNP2 in order to meet the housing target assigned by the Local Plan. The decision was made to refer to these alternatives as **growth scenarios**.

The process of defining growth scenarios is set out in Section 5 of this report and is summarised in a flow diagram.

Defining growth scenarios



The process led to six scenarios for assessment – see below. The context is a residual need to provide: for 256 homes;¹ and *at least* 3.5 ha of employment land.²

The reasonable alternative growth scenarios

Growth scenario		1	2	3	4	5	6
Housing sites	Commitments 2022/23	90	90	90	90	90	90
	Cattle Market	45	45	45	45	45	45
	Diagnostics Reagents	25	25	25	25	25	25
	Oxford Road	150	150	150			
	S. Moreton Lane				350	350	350
Emp. sites	Rycote Lane	Yes		Yes	Yes		Yes
	Howlands Road		Yes	Yes		Yes	Yes

¹ See discussion in Section 5. The 256 homes figure is the residual target from the adopted Local Plan. All of the scenarios would involve provision for significantly more than 256 homes (either 310 homes or 510 homes); however, it is appropriate to identify a supply that exceeds the target, to account for the risk of unforeseen delivery issues. With regards to scenarios involving South of Moreton Lane, whilst these do arguably involve unreasonably high growth, there are arguments for exceeding the local plan target, and the site does have certain merit such that it warrants testing; for example, and notably, the proposal is to deliver a new community hub and land for a primary school, as well as a 4.4 ha extension to the Cuttle Brook Local Nature Reserve.

² The question of how much land must be provided for through the TNP2 in order to meet the local plan employment land target is complicated; however, regardless, there are clear arguments for providing for significant new employment land through the TNP2. The gross area of Rycote Lane is 7.8 ha whilst the gross area of Howlands Road is 15.5 ha; however, in both cases the developable area is likely to be significantly less.

The reasonable alternative growth scenarios



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The table below presents the assessment findings. Presented subsequently is the Town Council's response to the assessment / explanation of the preferred approach.

With regards to assessment methodology:

Within each row (i.e. for each of the topics that comprise the SEA framework) the columns to the right hand firstly rank the scenarios in order of preference and then, secondly, highlight instances of a predicted positive (**green**), minor positive (**light green**), minor negative (**amber**) or negative (**red**) significant effect on the baseline (mindful of established objectives). Also, '=' is used to denote instances of scenarios performing broadly on a par.

Growth scenarios assessment findings

Topic	Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 5	Scenario 6
	Oxford Rd Rycote Lane	Oxford Rd H'lands Road	Oxford Rd Rycote Lane H'lands Road	S. M'ton Lane Rycote Lane	S. M'ton Lane H'lands Road	S. M'ton Lane Rycote Lane H'lands Road
Biodiversity	=	=	=	=	=	=
Climate change	=	=	=	=	=	=
Health	2	2	2	1★	1★	1★
Historic env	2	1★	2	1★	1★	1★
Landscape	1★	2	2	2	3	4
Land, soil, water	1★	2	2	2	3	3
Population / communities	3	2	2	2	2	1★
Transport	1★	2	2	3	4	4

Discussion

It is not the aim of this assessment to arrive at a conclusion regarding which scenario is best performing, or 'most sustainable', overall, because the assessment is undertaken without any assumptions regarding the degree of importance, or 'weight', that should be assigned to each of the topics that together comprise the SEA framework.

The appraisal shows a mixed picture. One point to note is that Scenario 3 is not found to be best performing under any topic heading; however, on the other hand, under no topic heading it is not found to be the worst performing scenario.

Having made these initial points, the following bullets consider each topic in turn:

- **Biodiversity** – there are no issues in respect of proximity to a nationally designated Sites of Special Scientific Interest (SSSIs), nor locally designated Local Wildlife Sites (LWSs). Neither is it the case that any of the sites in question intersect non-designated priority habitat, nor do there appear to be any major concerns in respect of loss of / impacts to mature historic hedgerows (there is a notable mature hedgerow at the northern edge of South of Moreton Lane). In this light, the key consideration is the close association of both of the housing site options with the Cuttle Brook corridor (and the confluence of the Cuttle Brook and the River Thame, in the case of Oxford Road). Both housing options have the potential to support the achievement of significant enhancements, in terms of biodiversity / functioning of the river corridor and also recreational access. The opportunity could be particularly significant in respect of South of Moreton Lane, where the site promoters propose a 4.4 ha extension to the Cuttle Brook Local Nature Reserve.

In **conclusion**, it is not possible to differentiate between the alternative growth scenarios with any confidence. The sites in question are not significantly constrained in biodiversity terms, so it would not be appropriate to flag a concern with higher growth scenarios. With regards to significant effects, there is an argument for concluding a likelihood of positive effects under all scenarios, given the national requirement to deliver net gain, but neutral effects are predicted on balance.

- **Climate change** – beginning with the matter of **climate change adaptation** / resilience to anticipated effects of climate change, flood risk is typically a primary consideration, and this applies strongly locally, given the close association of Thame with the Cuttle Brook and the River Thame. Both of the housing site options in question intersect fluvial flood zones; however, in both cases detailed work has been completed to demonstrate the potential to masterplan the development so as to avoid development within, and suitably buffer, the flood zone. Oxford Road potentially gives rise to greater concern regarding development in close proximity to the flood risk zone (mindful of flood zones expanding under climate change scenarios), but Land South of Moreton Lane feasibly gives rise to a degree of concern on the basis of being upstream of Thame (although, on the other hand, it could feasibly be the case that development supports enhancement of the river corridor such that there is an improvement to flood water storage capacity and, in turn, reduced downstream flood risk).
- Moving onto **climate change mitigation** / decarbonisation, the primary consideration is minimising per capita greenhouse gas emissions from **transport**, which primarily means minimising the need to travel and supporting a modal shift away from the private car. In this respect, both of the housing site options are considered to perform fairly well, in that they are well related to the town centre and with good access to walking and cycling infrastructure; however, there is an argument for delivering housing growth at Thame in line with the local plan requirement, rather than significantly exceeding this (via allocation of South of Moreton Lane), mindful that there could be alternative locations for growth that are preferable to Thame in terms of transport-related greenhouse gas emissions (e.g. towns with a train station).

Finally, with regards to the objective of minimising per capita greenhouse gas emissions from the **built environment**, growth at scale can give rise to opportunities, over-and-above piecemeal growth, e.g. in respect of achieving regulated operational emissions that exceed the requirements of Building Regulations, and perhaps also unregulated emissions (e.g. embodied carbon in building materials). However, in this instance it is not clear that the larger housing site option (South of Moreton Lane) leads to any opportunity over-and-above the smaller site (Oxford Road).

In **conclusion**, the primary consideration here is judged to be flood risk affecting both of the housing site options. It is not possible to conclude with any certainty that there is a particular concern, even given uncertainties regarding climate change; however, at this stage it is judged appropriate to flag a 'moderate or uncertain' negative effect. The Environment Agency may wish to comment further through the current consultation.

- **Health and wellbeing** – both of the housing sites are associated with very good potential to deliver new community and green/blue infrastructure, to the benefit of new and existing residents.

With regards to green/blue infrastructure, as per the discussion above under 'biodiversity', there is an argument to suggest that South of Moreton Lane gives rise to the more significant opportunity.³ Furthermore, the proposal for South of Moreton Lane is to deliver a new community hub and land for a primary school, plus the site is adjacent to the Phoenix Trail cycle path.⁴ A public right of way passes through the site, linking Thame to Moreton, but there is little reason to suggest that development would reduce the activeness of this as a walking route (the proposal is to deliver the primary school and community hub either side of the path).

In **conclusion**, both of the housing site options are supported, from a health and wellbeing perspective, but South of Moreton Lane is considered to represent a particular opportunity.

- **Historic environment** – this is a key consideration locally, given: A) Thame's heritage as a market town situated within a characteristic low-lying farmed landscape associated with the confluence of the River Thame and Cuttle Brook, as reflected in the extensive town centre conservation area and historic villages, hamlets and farmsteads linked to the town (most notably Moreton to the South and Towersey to the east); and B) very extensive and significant archaeology, as explained in a detailed note provided by the County Council in January 2022 (with specific referenced to all of the sites in question). Taking the four sites in turn:

- Oxford Road – is highly sensitive in archaeological terms, with the County Council explaining that investigations *"have revealed over 5000 years of human occupation to be present in this area, most significantly represented by the discovery of a triple ditched early Neolithic causewayed enclosure. Other Neolithic features such as a possible henge and a series of pits were also recorded as was considerable surviving remains of an Iron Age, Roman and Saxon settlement."* In this light, the proposal is to leave the primary area of archaeological interest undeveloped and to make the land accessible as open space. This could have the effect of increasing appreciation of the asset, as the land is not currently accessible; however, it is recognised that built form will have an effect on the setting of the asset.

In addition to the archaeological constraint, there would also be development adjacent to Thame Conservation Area. A particular concern relates to impacts to a sensitive view from Oxford Road, specifically a view to the north along the Cuttle Brook Corridor. This matter is currently being examined closely through planning application P22/S2418/FUL (77 homes). There is also a need to consider east-bound traffic passing through the conservation area.

- South of Moreton Lane – is not known to be significantly constrained in archaeological terms, but there is a need to consider the landscape gap between Thame and the Moreton Conservation Area, mindful that a public footpath passes through the site linking the two settlements. However, the proposal is to deliver a significant landscape buffer at the southern extent of the scheme, such that the remaining landscape gap will be ~1km. A further consideration is an adjacent site of a former windmill (shown on pre-WWI OS map); however, it is noted that there is already an adjacent consented housing scheme.
- Rycote Lane – is subject to the same archaeological constraint discussed above in respect of Oxford Road. However, unlike Oxford Road there is a need for further work to confirm precisely how to address the constraint, i.e. there remains a need for further archaeological evaluation to inform a decision on measures required that preserve features of interest.
- Howlands Road – is located in an area of archaeological interest, but there is little reason to suggest a degree of constraint similar to that discussed above in respect of Oxford Road and Rycote Lane. There are also non-listed historic farm buildings.

In **conclusion**, it is difficult to differentiate between the scenarios, as all of the sites are subject to a degree of constraint and have been the focus of varying levels of work in respect of avoidance and mitigation. On balance, it is appropriate to flag a particular concern / risk under scenarios involving allocation of both Oxford Road and Rycote Lane. Historic England and/or Oxfordshire County Council may wish to comment further through the consultation.

- **Landscape** – greatest concern is associated with the two employment sites, as they are located outside of the ring road. In particular, Howland Road would be prominent in the landscape along the historic road link between Thame and Towersey. Also, it could be appropriate to consider this site alongside the housing site option to the north ('East of Thame'), which is not progressed to the reasonable alternative growth scenarios at the current time (see Section 5). With regards to Rycote Lane, there is a need to note the nearby employment site under construction and adjacent committed site for a new cattle market.

³ In addition to a 4.4 ha extension to the Cuttle Brook Local Nature Reserve, the proposal is to deliver 3.5 hectares of open space within the scheme, such that the overall proposal is to deliver nearly 8 ha of new accessible greenspace.

⁴ Furthermore, the site promoters state: *"The length of the Phoenix Trail to the north of the site is in the same ownership as [the site] and currently leased to Sustrans. This would be provided in perpetuity to Sustrans as part of the wider site proposals."*

With regards to the housing site options, South of Moreton Lane is also associated with a degree of landscape constraint, given the landscape gap to Moreton (as discussed above), whilst Oxford Road is considered to perform well in landscape terms.

In **conclusion**, it is possible to identify Scenarios 5 and 6 as least preferable; however, even under these two scenarios, negative landscape impacts would be of limited significance.

- **Land, soil, water** – a key consideration here is agricultural land quality, with the low resolution / low accuracy nationally available dataset suggesting a higher prevalence of better quality (grade 2) land to the south (South of Moreton Lane) and to the east (Howland Road) than to the west (Oxford Road and Rycote Lane) of Thame. Detailed survey information has not been submitted for any of the four sites in question (something that could be addressed prior to plan finalisation).

Another consideration under this heading can relate to capacity for additional wastewater treatment, but there is no available evidence of any particular issue at the Thame treatment works (located close to the Oxford / Aylesbury Road). The Environment Agency, Thames Water and/or the River Thame Conservation Trust may wish to comment through the consultation (including in respect of any barriers to a high housing growth strategy along the lines of Scenario 6).

Another potential issue is the undue sterilisation of minerals resources, but Thame is not associated with a Minerals Strategic Resources Area (as defined by the Oxfordshire Minerals and Waste Plan). Finally, there is a need to avoid hindering waste management operations and, in this respect, it is important to note that Rycote Lane (under consideration for employment) is in close proximity to a safeguarded waste operation, ASM Autos.

In **conclusion**, it is appropriate to highlight the two sites to the west of Thame as performing well in respect of agricultural land quality. Whilst it is not known whether the land in question is grade 3a (and therefore ‘best and most versatile’, BMV) or grade 3b (not BMV), it is likely to be the case that the land is lower quality than is the case for the other two sites in question.

- **Population and communities** – there are a range of important considerations here, over-and-above those already discussed under ‘health and wellbeing’.

Firstly, with regards to **housing** needs, it is fair to support the highest growth scenario, despite this involving planning for a quantum of homes significantly above the local plan requirement (for the plan period). As well as generally recalling the Government’s ambition of “significantly boosting the supply of homes” (NPPF para 60), it is likely that there is a need for affordable housing locally (social rent, affordable rent, affordable home ownership) over-and-above that which would be delivered under a scenario whereby the local plan housing requirement is met.

The next key consideration is **employment land** needs, both those clearly arising locally and wider strategic needs / opportunities, recognising that Thame is strategically located between Oxford and Aylesbury (and well connected to the M40), within the Oxford to Cambridge (OxCam) Arc. This serves to suggest support for the highest employment growth scenario. Also, further work is needed to confirm the capacity of Rycote Lane in light of archaeological constraints. Finally, in respect of employment land, whilst both sites are suitably well-located in terms of access to the strategic road network, Rycote Lane is better connected to the M40.

Focusing on the two housing options, **other considerations** have mostly already been covered above. Both sites would deliver, or facilitate delivery of, significantly more than just new housing, and this is most notably the case for South of Moreton Lane; however, there is an argument to suggest that Oxford Road is preferable in transport-terms.

In **conclusion**, under this heading it is considered appropriate to state support for higher growth scenarios, particularly in terms of employment land.

- **Transport** – the Oxford Road housing site option is judged to be preferable in transport terms, given very good proximity and connectivity to the town centre, as well as the strategic road network and bus routes (enabling connectivity by bus to Oxford, as well as Aylesbury and Haddenham and Thame train station). However, it is recognised that detailed transport work has been completed by the South of Moreton Lane site promoter with a view to demonstrating suitable transport connectivity, including the suitability of a single road access point from the east, via a recent housing site. With regards to the two employment sites, as discussed above, both sites are broadly suitably located in transport terms, but there is a preference for Rycote Lane, which is very well-located in respect of the strategic road network and also in terms of bus connectivity.

In **conclusion**, Scenario 1 (Oxford Rd and Rycote Lane) performs best, and it is fair to predict moderate or uncertain positive effects in respect of the transport baseline / transport objectives.

The Town Council's planning officer responded to the growth scenarios assessment as follows (N.B. the following text does not comprise an assessment):

“Scenario 1 is supported on balance, in light of the assessment. It performs well in a number of respects, although it is recognised that the assessment serves to highlight certain arguments for an alternative approach.

With regards to housing, Oxford Road is judged to perform strongly overall, even after account is taken of the potential need to avoid and mitigate landscape and historic environment concerns. Whilst South of Moreton Lane has the potential to deliver significant community and green infrastructure, it is sequentially less preferable and would involve a number of homes significantly above the number required by the South Oxfordshire Local Plan.

With regards to employment land, Rycote Lane is the preferable site. It is, however, recognised that there are certain arguments for a quantum of new employment land above that which could be delivered at Rycote Lane, once account is taken of onsite constraints. This is a matter that will likely require further consideration subsequent to this round of consultation.”

Assessment findings at this stage

Part 2 of this report presents an assessment of the TNP2 as a whole, as it stands at the current time (consultation on the pre-submission plan).

Assessment findings are presented as a series of narratives under the SEA framework. The assessment reaches the following overall conclusions:

The appraisal predicts **significant positive** effects under two topic headings (communities and transport), **moderate or uncertain positive** effects under two topic headings (biodiversity and health), **neutral effects** under three headings (climate change, landscape and land / soil / water) and **moderate or uncertain negative** effects under just one topic heading (historic environment).

No specific recommendations are made as part of the appraisal; however, the appraisal raises a number of issues that will need to be given further consideration prior to plan finalisation, alongside consultation responses.

Next steps

This Environmental Report is published for consultation alongside the ‘pre-submission’ version of the TNP2 under Regulation 14 of the Neighbourhood Planning Regulations 2012. The aim is to inform the pre-submission consultation.

Consultation responses received will be taken into account by the Town Council, who will then aim to finalise the TNP2 for submission to South Oxfordshire District Council (Regulation 15). The District Council will then run another consultation (Regulation 16) before passing representations received to an Independent Examiner.

The Independent Examiner will then examine whether the TNP2 meets with the nationally established Basic Conditions for neighbourhood plans, and is in general conformity with the adopted local plan.

If the outcome of the Independent Examination is favourable, the TNP2 will then be subject to a referendum, and the plan will be ‘made’ if more than 50% of those who vote are in support.

1. Introduction

Background

- 1.1 AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Thame Neighbourhood Plan 2020-35 (TNP2).
- 1.2 The TNP2 is being prepared by Thame Town Council, under the Neighbourhood Planning Regulations 2012 and in the context of the South Oxfordshire Local Plan adopted in 2020. Once 'made' the TNP2 will supersede the current Thame Neighbourhood Plan (TNP) and will have material weight when deciding on planning applications, alongside the local plan.
- 1.3 SEA is a required process for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising positive effects.⁵

SEA explained

- 1.4 It is a requirement that the SEA process is undertaken in-line with the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.5 In-line with the Regulations, a report (known as the Environmental Report) must be published for consultation alongside the draft plan that assesses "the plan, and reasonable alternatives".⁶ The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.6 More specifically, the Report must answer the following three questions:
 1. What has plan-making / SEA involved up to this point?
 - including in relation to 'reasonable alternatives'.
 2. What are the SEA findings at this stage?
 - i.e. in relation to the draft plan.
 3. What happens next?

This Environmental Report

- 1.7 This report is the Environmental Report for the TNP2. It is published alongside the 'pre-submission' version of the plan, under Regulation 14 of the Neighbourhood Planning Regulations (2012, as amended).
- 1.8 This report answers each of the three questions introduced above in turn.⁷ Each question is answered within a discrete 'part' of the report.
- 1.9 Before answering question 1, there are two further introductory sections.

⁵ Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: A) an environmental report; or, B) a statement of reasons why SEA is not required, prepared following a 'screening' process. The TNP2 has been subject to screening, through which it has been determined that SEA is a required. As such, there is a need to submit this Environmental Report (or an update).

⁶ Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004.

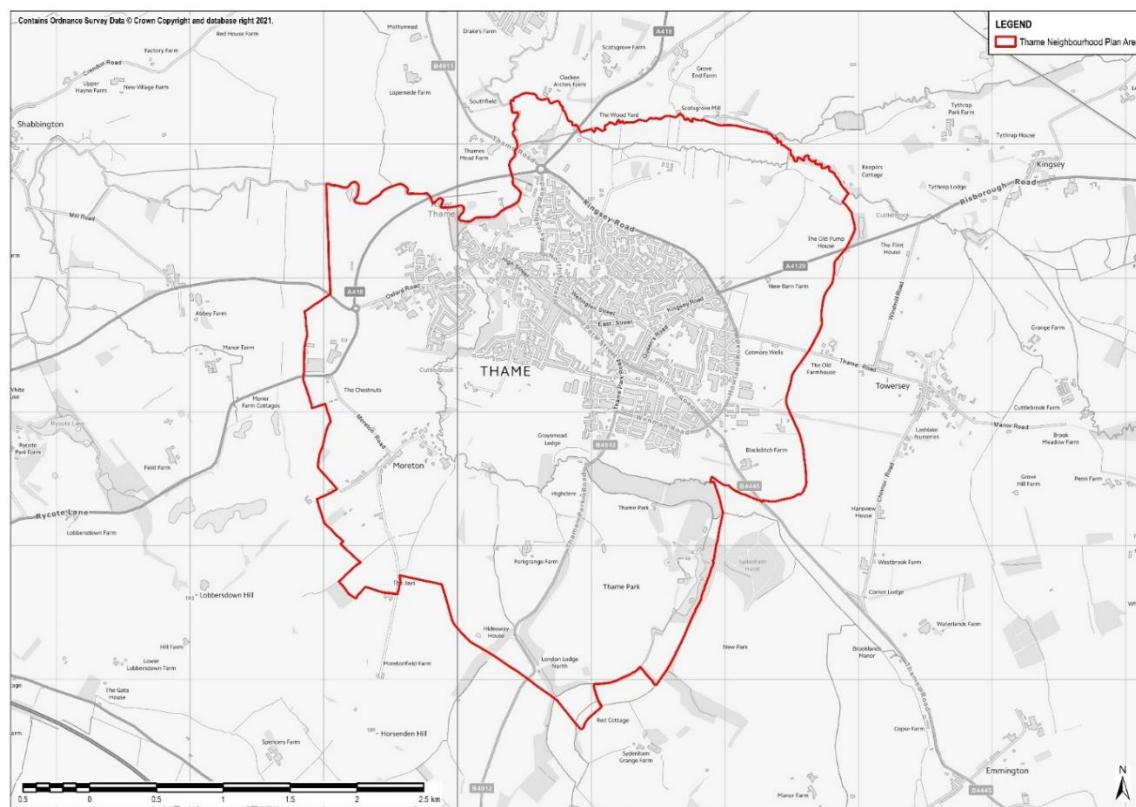
⁷ See **Appendix A** for further explanation of the report structure including its regulatory basis.

2. What is the plan seeking to achieve?

Introduction

2.1 This section considers the context provided by the South Oxfordshire Local Plan before setting out the TNP2 vision and objectives.

Figure 2.1: The plan area (Thame Town Council area)



The local plan context

2.2 Of particular importance for Thame is Policy TH1 of the South Oxfordshire Local Plan, 2020 – 2035, which deals with ‘The Strategy for Thame’. It states:

Neighbourhood Development Plans are expected to, and the Council will support development proposals that:

- i. deliver homes in accordance with Policy H3;
- ii. strengthen the retail offer within Thame Town Centre;
- iii. improve the attraction of Thame for visitors and businesses;
- iv. improve accessibility, car and cycle parking, pedestrian and cycle links;
- v. support schemes that enhance the quality of the town’s environment and conserve and enhance the town’s heritage assets;
- vi. provide new employment opportunities and improve the stock of existing employment areas; and
- vii. provide new, or enhanced community facilities that meet an identified need.

- 2.3 With regards to Policy H3, of the South Oxfordshire Local Plan, this establishes a requirement for 1,518 new homes to be accommodated in Thame over the period 2011 – 2035, of which it states that there is an outstanding minimum requirement of 339 new homes as of April 2020.
- 2.4 Additionally, other policies in the local plan set requirements (for the period 2011 – 2035) for employment land (a minimum of 3.5 ha, to provide office, manufacturing and distribution jobs) and convenience retail floorspace (1,500sqm taking a ‘town centre first approach’ to provision).
- 2.5 All of these requirements are to be provided for through the TNP2. However, crucially, certain of the requirements have already been met in part, through development sites that have gained planning permission (‘commitments’) since 2020. It is only the residual requirements (i.e. the local plan requirement, as of April 2020, minus new commitments post April 2020) that must be provided for through the TNP2. Further discussion is presented in Section 5.

The neighbourhood plan objectives

- 2.6 An overarching objective is to guide the growth of the town with a view to sustainable development. The following specific objectives are in place to guide plan preparation:
- The compactness and walkability of Thame should be retained, with new homes within comfortable travel distance, by foot and by bike, from the town centre and other social and community facilities.
 - The sensitive environment around Thame should be respected, with areas of new growth avoiding areas of nature conservation and flood risk.
 - Growth should avoid impacting on the landscape setting of Thame, retaining proximity to the surrounding countryside.
 - The separate identity of Thame and outlying villages, including Moreton, to the south, and Towersey, to the east, should be retained.
 - New development should be well integrated with the existing built form, contributing to the achievement of integrated communities.
 - New development should respect the historic growth and evolution of Thame.
- 2.7 These objectives are reflected spatially across a series of maps presented within the plan document, and provide an important starting point for the discussion of “reasonable alternatives” presented in Sections 4 and 5.

3. What is the scope of the SEA?

Introduction

3.1 The aim here is to introduce the reader to the broad scope of the SEA, i.e. the sustainability topics and objectives that should be a focus of the assessment of the plan and reasonable alternatives. Appendix B presents further information.

Consultation

3.2 The SEA Regulations require that “*when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are the Environment Agency, Historic England, and Natural England.⁸ As such, these authorities were consulted in 2021.

The SEA framework

3.3 Through the scoping process an SEA framework was established. Its purpose is to structure the appraisal of the plan and reasonable alternatives.

Table 3.1: The SEA framework

SEA theme	SEA objective
Biodiversity and geodiversity	Protect and enhance biodiversity and geodiversity sites and features and deliver demonstrable biodiversity net gains.
Climate change	Reduce the contribution to climate change made by activities locally. Support the resilience of the local area to the potential effects of climate change, including flooding.
Health and wellbeing	Improve the health and wellbeing of local residents.
Historic environment	Protect, conserve, and enhance the historic environment within and surrounding the plan area.
Landscape	Protect and enhance the character and quality of the immediate and surrounding landscape/townscape.
Land, soil, and water resources	Ensure the efficient and effective use of land. Protect and enhance water quality and use and manage water resources in a sustainable manner.
Population and communities	Ensure growth in the town is aligned with the needs of all groups; accounts for infrastructure capacity, including with a view to improving access to community infrastructure; anticipates future needs and specialist requirements; and supports cohesive / inclusive communities.
Transportation and movement	Promote sustainable transport use and reduce the need to travel.

⁸ These consultation bodies were selected “*by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes*” (SEA Directive, Article 6(3)).

Part 1: What has plan-making/ SEA involved to this point?

4. Introduction (to Part 1)

Overview

- 4.1 Plan-making has been going since 2021, and there have been two informal consultations prior to this current formal consultation (under Regulation 14).
- 4.2 This is important context; however, the aim here is not to provide a comprehensive explanation, or audit trail, of work to date. Rather, the aim is to explain work undertaken to develop and appraise **reasonable alternatives** in early **2023** ahead of finalising the TNP2 for consultation under Regulation 14.
- 4.3 More specifically, this part of the report presents information on the consideration given to reasonable alternative approaches to addressing a particular issue that is of central importance to the plan, namely allocation of land for development. The decision was taken to refer to '**growth scenarios**'.

Why focus on growth scenarios?

- 4.4 The decision was taken to focus on 'growth scenarios' (i.e. alternative approaches to development) in light of the TNP2 objectives (see Section 2), and due to the likelihood of being able to differentiate between the merits of growth scenarios in respect of 'significant effects' (in line with guidance).

N.B. **individual site options** are not reasonable alternatives (where the objective of the plan is not to allocate an individual site option). However, individual site options are clearly important, and are considered in detail in Section 5, as part of the process of arriving at reasonable growth scenarios.

Who's responsibility?

- 4.5 It is important to be clear that:
 - **Defining scenarios** - is ultimately the responsibility of the plan-maker, although the SEA consultant (AECOM) is well placed to advise.
 - **Assessing scenarios** - is the responsibility of the SEA consultant.
 - **Deciding a preferred approach** - is the responsibility of the plan-maker.

Structure of this part of the report

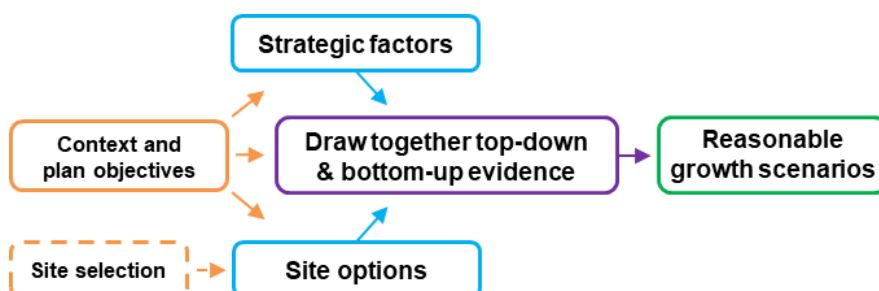
- 4.6 This part of the report is structured as follows:
 - **Chapter 5** - explains the process of defining scenarios.
 - **Chapter 6** - presents the outcomes of assessing scenarios.
 - **Chapter 7** - explains reasons for supporting the preferred approach.

5. Defining growth scenarios

Introduction

5.1 The aim here is to explain a process that led to the definition of growth scenarios for assessment, as summarised in Figure 5.1.⁹

Figure 5.1: Defining growth scenarios



Structure of this section

5.2 This section is structured so as to:

- explore **strategic factors** with a bearing on growth scenarios;
- consider individual **site options** in contention for allocation; and
- draw upon the preceding sections to define **growth scenarios**.

Strategic factors

5.3 This section covers:

- The context provided by the local plan; and
- wider strategic factors

The local plan

5.4 Local plan policy has already been discussed in Section 2. The aim here is to recap, elaborate and set out the implications for reasonable growth scenarios.

5.5 With regards to growth quantum, the following consider the local plan requirements for housing, retail and employment in turn:

- **Housing** – whilst the requirement for the plan period (2020-2035) is a minimum of 339 new homes, as of the end of the 2021-2022 monitoring year (31st March 2022) 83 homes had gained planning permission, leaving a residual figure of **256 homes**. This is the key target figure for the TNP2 (and it is a minimum figure, including as there is a need to ensure a contingency for unforeseen delivery issues). However, it is also the case that some further homes have gained planning permission in the most recent monitoring year, which further reduces the residual target figure. These sites are discussed further below, in Section 5.3.

⁹ The aim is to meet the legal requirement (Schedule 2(8) of the SEA Regulations) to present “an outline of the reasons for selecting the alternatives dealt with” within the Environmental Report.

- **Employment land** – as discussed in Section 2, the local plan requires a minimum of 3.5 ha over the period 2011-2035. Since 2011 there have been both losses of employment land and also some new employment land that has been granted planning permission. The net effect of this is a contribution to the 3.5 ha target, leaving only a residual requirement to be provided for through the TNP2. However, it is not possible to pinpoint a precise figure. Further context then comes from an Employment Land Evidence Report (November 2022), which recommends a higher requirement figure of 5.5 ha for the period 2011-2035. The *overall net effect* is a requirement for the TNP2 to provide for in excess of the original local plan requirement of 3.5 ha, but it is not possible to be more precise.
- **Retail** – the local plan requirement for convenience retail floorspace (1,500sqm and a ‘town centre first’ approach) can be met at the cattle market site in the town centre. A new site to host the cattle market was granted permission on Rycote Lane in 2020, which frees-up the existing town centre cattle market site for redevelopment. The site was allocated for a mixed-use redevelopment in the adopted TNP1, and since then there has been further consideration of the best approach to redevelopment, including detailed technical work through a Masterplanning Report (AECOM, 2023).¹⁰ The report proposes a retail-led scheme including 45 homes, and there is no clear basis for questioning this approach.

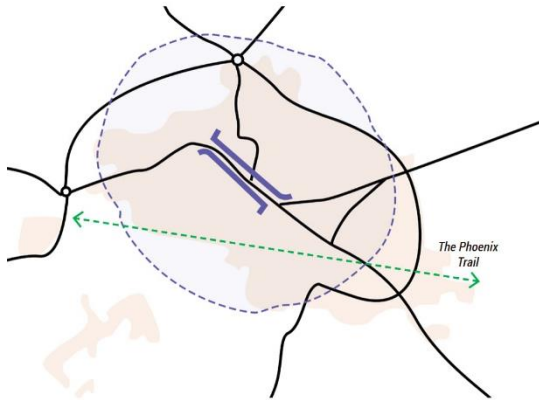
5.6 With regards to **distribution**, there is a need to reflect all of the requirements set out in Policy TH1 (‘The Strategy for Thames’). However, potentially a key message is that there is a need to deliver new transport and community infrastructure alongside housing growth, which potentially serves as an argument for supporting larger-scale (and potentially ‘strategic scale’) housing sites, as opposed to smaller scale (‘piecemeal’) housing sites with less potential to deliver new infrastructure, or at least less potential to deliver new infrastructure to the benefit of existing as well as the new community (‘planning gain’). It is also important to note that Local Plan Policy EMP2 (Range, Size and Mix of Employment Premises’) supports provision of flexible employment floorspace for small and medium business, including start-ups and those looking to expand. In this light, there is a need to consider the possibility of delivering small scale employment space within housing-led development sites.

Wider strategic factors

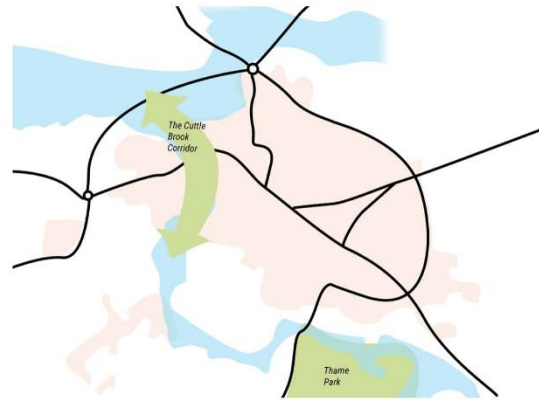
- 5.7 A wide range of strategic factors have been explored through two early (informal) consultations held prior to this current (formal) consultation.
- 5.8 Focusing on the more recent consultation, this was held between December 2021 and February 2022. The consultation boards presented the plan objectives in spatial form (Figure 5.2), identified a shortlist of potential growth locations (discussed further below, under the ‘site options’ heading) and also identified a series of four ‘wider ideas’, which are shown below as Figure 5.3.
- 5.9 A report on consultation responses received was then published in March 2022. The report mainly focused on site-specific issues / opportunities / preferences (discussed below), but also notably highlighted that, of the four ‘wider ideas’, there was most support for the two involving enhanced walking routes.

¹⁰ Further information is also available at the website of the [Cattle Market Action Group](#).

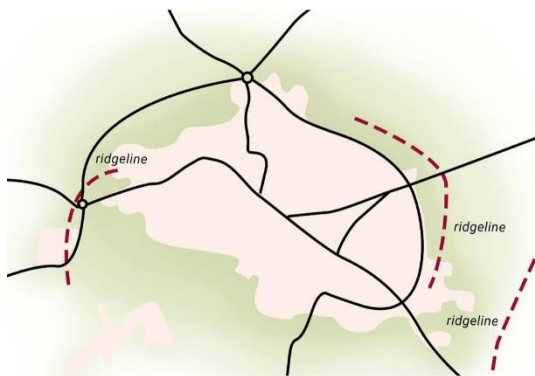
Figure 5.2: The plan objectives depicted spatially



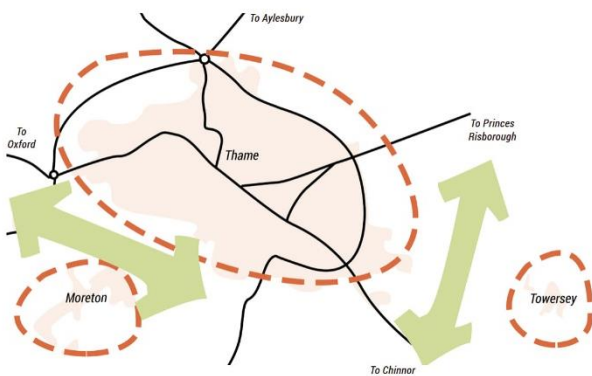
1) The compactness and walkability of Thame should be retained, with new homes within comfortable travel distance, by foot and by bike, from the town centre and other social and community facilities located around the town.



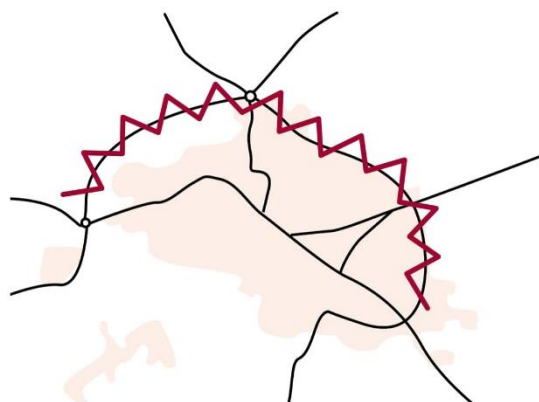
2) The sensitive environment around Thame should be respected, with areas of new growth avoiding areas of nature conservation and flood risk.



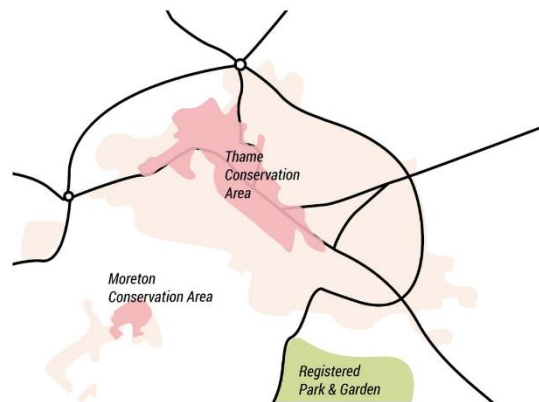
3) The landscape setting, quality of this and access to the green spaces and open countryside around Thame should be retained.



4) The separate identity of Thame and outlying villages, including Moreton, to the south, and Towersey, to the east, should be retained.

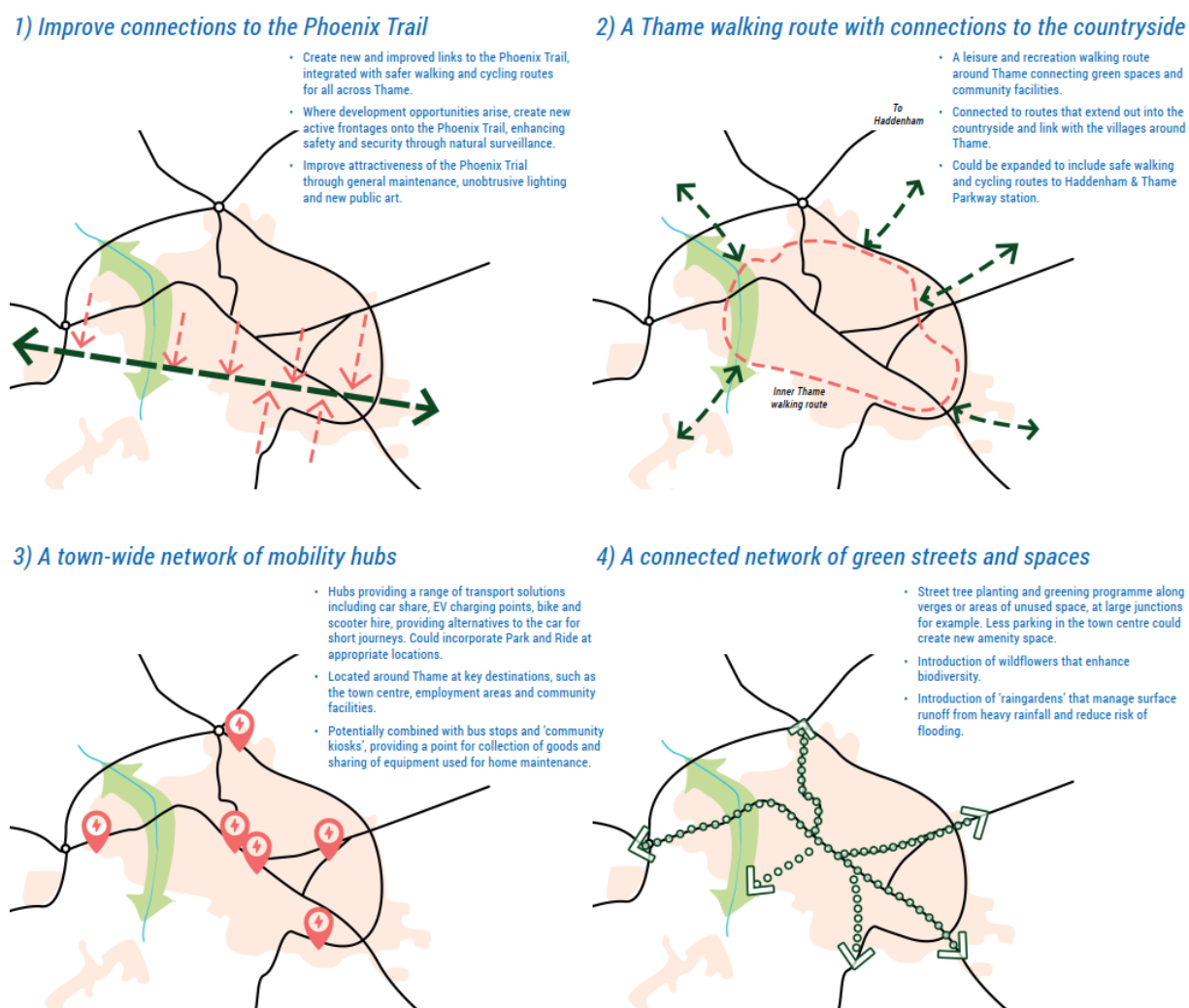


5) New housing development should help support social inclusion, being well integrated with the existing built-up area of Thame and avoiding barriers to movement.



6) New development should respect Thame's historic areas and past growth.

Figure 5.3: Wider spatial ideas consulted-upon in 2021/22



5.10 Other wider strategic factors with a bearing on growth scenarios are discussed within the current consultation document. In particular:

- **Climate change and green living** – Thame Town Council adopted a Green Living Plan in 2020 in response to, and in support of, South Oxfordshire District Council's declaration of a Climate Emergency and its commitment to achieve net zero greenhouse gas emissions district-wide by 2030. This has important implications for spatial growth strategy, as there is a need to ensure a strategy that minimises per capita greenhouse gas emissions from both transport and the built environment.
- **Compact, walkable and 'complete' communities** – the objectives outlined in Figure 5.2 seek to strengthen Thame as a market town. They also seek to accommodate growth in a way that responds to the challenges of climate change and the impact of the Covid pandemic on the way we interact with the built and natural environment. Related to these objectives, one further overarching objective relates to supporting compact, walkable and 'complete' communities, where everyday services and facilities can be accessed easily by active modes of transport, with associated benefits for community cohesion and inclusivity.

Site options

5.11 Having discussed ‘top down’ strategic factors with a bearing on the definition of growth scenarios, the next step is to consider the site options that are available and in contention for allocation through the neighbourhood plan. Site options can be thought of as the building blocks of growth scenarios.

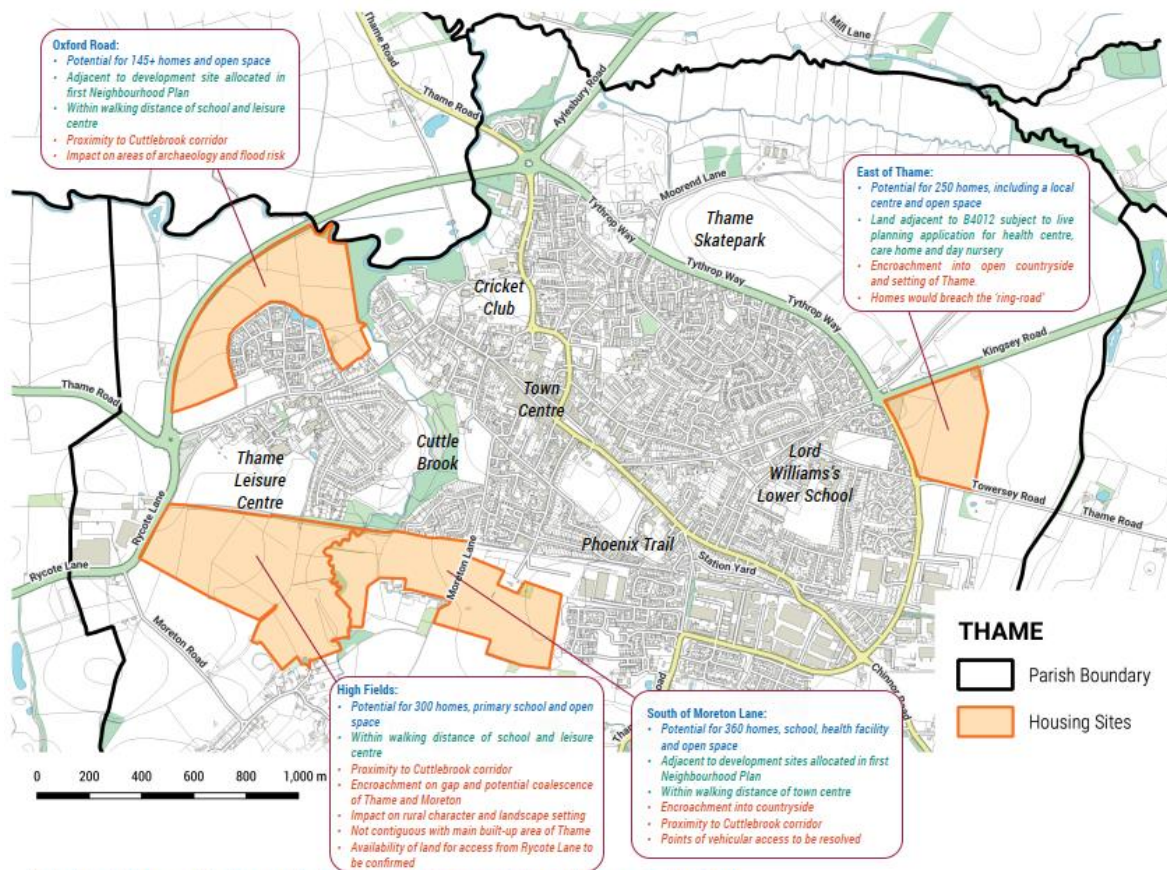
5.12 This section considers:

- the initial shortlist of site options; and
- the final shortlist of site options progressed to the growth scenarios.

Initial shortlist

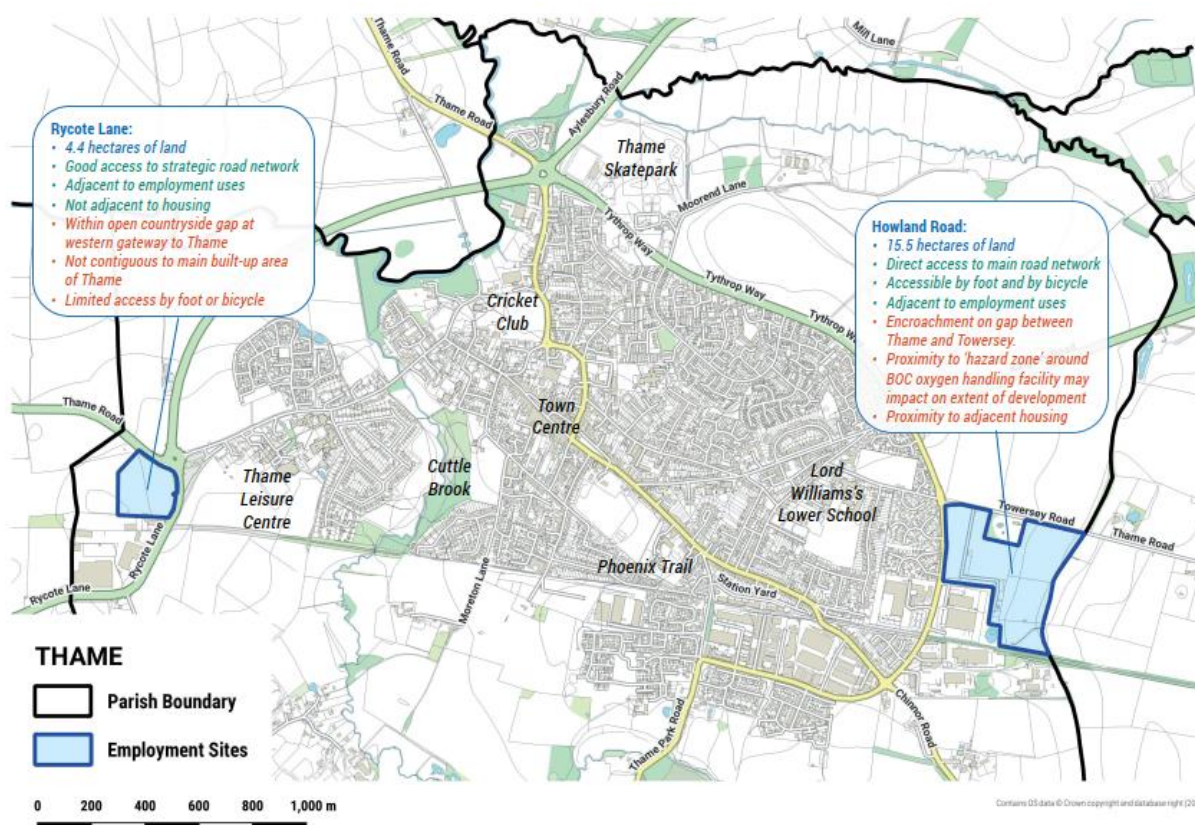
5.13 A reasonable starting point is the series of site options presented for consultation in 2021/22. Specifically the consultation boards (Figures 5.4 and 5.5), presented four housing site options and two employment site options.

Figure 5.4: Shortlisted housing sites at the time of the 2021/22 consultation



Notes: Aspects in favour of the sites are indicated with green text in the annotations, with those against in red text. All development figures based on information provided by site promoters, except for Oxford Road, where the figure is estimated based on the area of land outside areas of flood risk and archeological interest, with an average density of 30 homes per hectare then applied to this

Figure 5.5: Shortlisted employment sites at the time of the 2021/22 consultation



Note: Aspects in favour of the sites are indicated with green text in the annotations, with those against in red text.

Final shortlist

5.14 With regards to the **housing sites**, there is considered to be a very clear argument for ruling-out High Fields, which generally relates quite poorly to the existing urban edge in built form terms. Also, and on balance it, is considered reasonable to rule-out East of Thame. This is on the basis of the evidence presented in **Appendix II** of this report, which presents a comparative appraisal of the four housing site options.

5.15 With regards to the **employment sites**, on the basis of the evidence presented in the Consultation Summary (March 2022) there is a strong case for identifying Rycote Lane as sequentially preferable. However, there are a range of detailed pros and cons to both site options, which suggests a need for detailed appraisal of both. Furthermore, the option of allocating both sites cannot be ruled out, given the extent of need / opportunity, and given constraints affecting the Rycote Lane site that reduce the developable area (N.B. the gross site area is 7.8 ha, contrary to Figure 5.5, but the developable area is significantly less).

5.16 In **conclusion**, four of the site options introduced above are taken forward to the reasonable growth scenarios, namely:

- Oxford Road (~150 homes)
- South of Moreton Lane (~350 homes)
- Rycote Lane (smaller employment site)
- Howland Road (larger employment site)

The reasonable growth scenarios

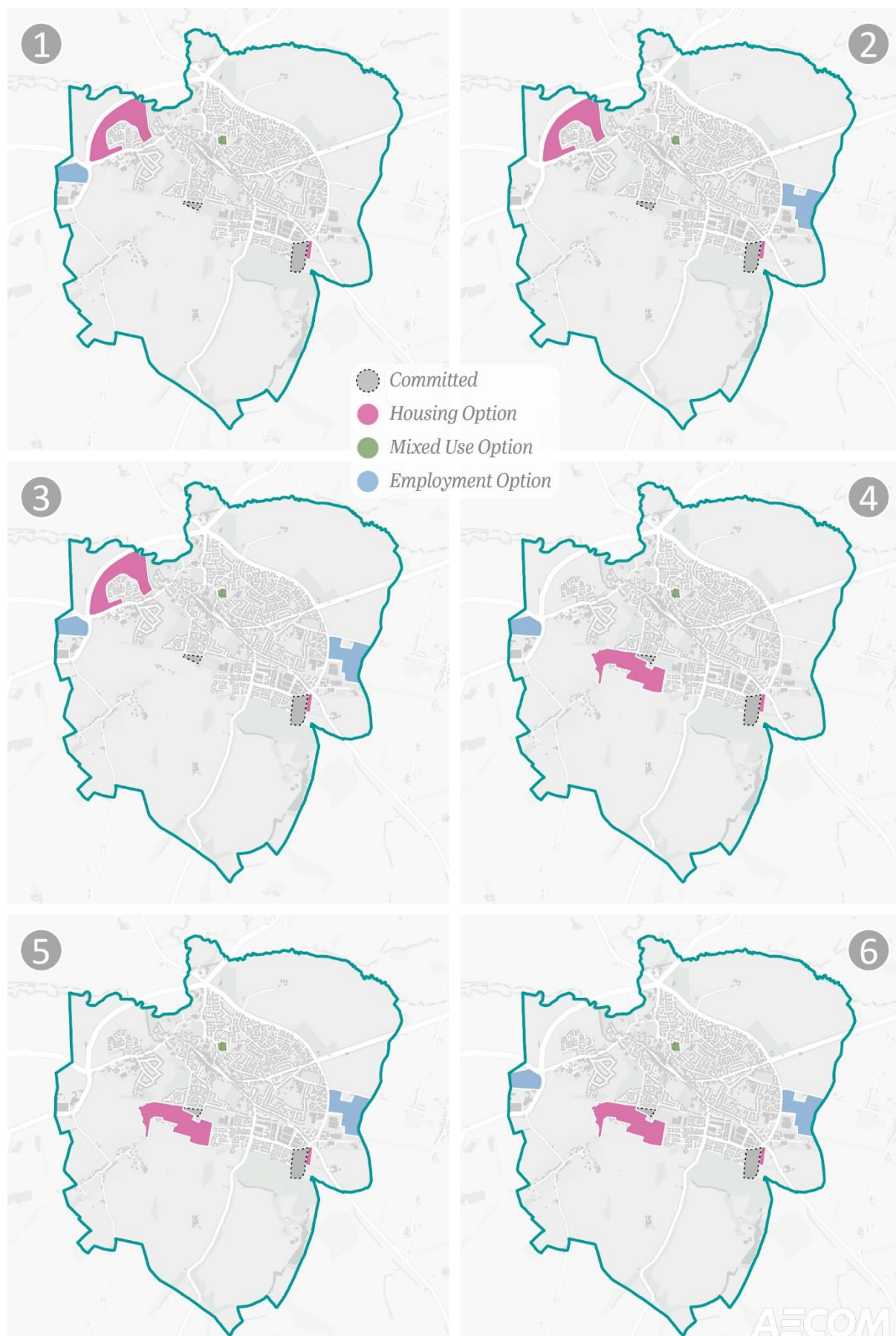
- 5.17 The aim is to define a single set of growth scenarios varying in terms of both housing and employment sites, such that the scenarios are mutually exclusive.
- 5.18 Beginning with housing, as discussed above, whilst there was a residual need for **256 homes** (to be provided for through the TNP2) at the end of the 2021/22 monitoring year, since that time the residual need has decreased. Specifically, the residual need has decreased by a total of 90 homes due to two smaller sites (not shown on Figure 5.4) now having gained planning permission or benefit from a resolution to grant permission subject to S106.¹¹
- 5.19 Furthermore, there are two non-committed sites that are considered to perform strongly, such that they warrant being a ‘constant’ across the growth scenarios. Firstly, as discussed above, the Cattle Market site (ref. GDR1 in the plan) is suited to delivering 45 homes. Secondly, Diagnostics Reagents (ref. GDH1b in the plan), which is located at the southeast extent of Thame (adjacent to a recently committed site; ref. GDH1b), has capacity for 25 homes.
- 5.20 Accounting for these four sites reduces the residual need to be provided for by the shortlisted site options discussed above (Oxford Road and South of Moreton Lane) to 96 homes. This serves as a clear reason for ruling out any growth scenario involving allocation of both sites. It also serves as an argument for ruling-out South of Moreton Road; however, on balance it is considered reasonable to consider growth scenarios that would deliver a quantum of new homes significantly about the requirement from the local plan.
- 5.21 With regards to employment, as discussed above the possibility of allocating both sites cannot be ruled out as unreasonable.
- 5.22 As such, there are six reasonable alternative growth scenarios.

Table 5.1: The reasonable alternative growth scenarios

Growth scenario		1	2	3	4	5	6
Housing sites	Commitments 2022/23	90	90	90	90	90	90
	Cattle Market	45	45	45	45	45	45
	Diagnostics Reagents	25	25	25	25	25	25
	Oxford Road	150	150	150			
	S. Moreton Lane				350	350	350
Emp. sites	Rycote Lane	Yes		Yes	Yes		Yes
	Howlands Road		Yes	Yes		Yes	Yes

¹¹ Both sites are allocated in the plan (ref. GDH1a and GDH1c).

Figure 5.6: The reasonable alternative growth scenarios



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6. Growth scenarios assessment

Introduction

6.1 The aim of this section is to present assessment findings in relation to the six reasonable alternative growth scenarios introduced above.

Assessment findings

6.2 Table 6.1 presents the assessment. With regards to methodology

Within each row (i.e. for each of the topics that comprise the SEA framework) the columns to the right hand firstly rank the scenarios in order of preference and then, secondly, highlight instances of a predicted positive (**green**), minor positive (**light green**), minor negative (**amber**) or negative (**red**) significant effect on the baseline. Also, ' = ' is used to denote performance on a par.

The assessment matrix is followed by an explanatory discussion.

Table 6.1: Growth scenarios assessment findings

Topic	Scenario 1 Oxford Rd Rycote Lane	Scenario 2 Oxford Rd H'lands Road	Scenario 3 Oxford Rd Rycote Lane H'lands Road	Scenario 4 S. M'ton Lane Rycote Lane	Scenario 5 S. M'ton Lane H'lands Road	Scenario 6 S. M'ton Lane Rycote Lane H'lands Road
Biodiversity	=	=	=	=	=	=
Climate change	=	=	=	=	=	=
Health	2	2	2	1★	1★	1★
Historic env	2	1★	2	1★	1★	1★
Landscape	1★	2	2	2	3	4
Land, soil, water	1★	2	2	2	3	3
Population / communities	3	2	2	2	2	1★
Transport	1★	2	2	3	4	4

Discussion

It is not the aim of this assessment to arrive at a conclusion regarding which scenario is best performing, or 'most sustainable', overall, because the assessment is undertaken without any assumptions regarding the degree of importance, or 'weight', that should be assigned to each of the topics that together comprise the SEA framework.

The appraisal shows a mixed picture. One point to note is that Scenario 3 is not found to be best performing under any topic heading; however, on the other hand, under no topic heading it is not found to be the worst performing scenario.

Having made these initial points, the following bullets consider each topic in turn:

- **Biodiversity** – there are no issues in respect of proximity to a nationally designated Sites of Special Scientific Interest (SSSIs), nor locally designated Local Wildlife Sites (LWSs). Neither is it the case that any of the sites in question intersect non-designated priority habitat, nor do there appear to be any major concerns in respect of loss of / impacts to mature historic hedgerows (there is a notable mature hedgerow at the northern edge of South of Moreton Lane). In this light, the key consideration is the close association of both of the housing site options with the Cuttle Brook corridor (and the confluence of the Cuttle Brook and the River Thame, in the case of Oxford Road). Both housing options have the potential to support the achievement of significant enhancements, in terms of biodiversity / functioning of the river corridor and also recreational access. The opportunity could be particularly significant in respect of South of Moreton Lane, where the site promoters propose a 4.4 ha extension to the Cuttle Brook Local Nature Reserve.

In **conclusion**, it is not possible to differentiate between the alternative growth scenarios with any confidence. The sites in question are not significantly constrained in biodiversity terms, so it would not be appropriate to flag a concern with higher growth scenarios. With regards to significant effects, there is an argument for concluding a likelihood of positive effects under all scenarios, given the national requirement to deliver net gain, but neutral effects are predicted on balance.

- **Climate change** – beginning with the matter of **climate change adaptation** / resilience to anticipated effects of climate change, flood risk is typically a primary consideration, and this applies strongly locally, given the close association of Thame with the Cuttle Brook and the River Thame. Both of the housing site options in question intersect fluvial flood zones; however, in both cases detailed work has been completed to demonstrate the potential to masterplan the development so as to avoid development within, and suitably buffer, the flood zone. Oxford Road potentially gives rise to greater concern regarding development in close proximity to the flood risk zone (mindful of flood zones expanding under climate change scenarios), but Land South of Moreton Lane feasibly gives rise to a degree of concern on the basis of being upstream of Thame (although, on the other hand, it could feasibly be the case that development supports enhancement of the river corridor such that there is an improvement to flood water storage capacity and, in turn, reduced downstream flood risk).
- Moving onto **climate change mitigation** / decarbonisation, the primary consideration is minimising per capita greenhouse gas emissions from **transport**, which primarily means minimising the need to travel and supporting a modal shift away from the private car. In this respect, both of the housing site options are considered to perform fairly well, in that they are well related to the town centre and with good access to walking and cycling infrastructure; however, there is an argument for delivering housing growth at Thame in line with the local plan requirement, rather than significantly exceeding this (via allocation of South of Moreton Lane), mindful that there could be alternative locations for growth that are preferable to Thame in terms of transport-related greenhouse gas emissions (e.g. towns with a train station).

Finally, with regards to the objective of minimising per capita greenhouse gas emissions from the **built environment**, growth at scale can give rise to opportunities, over-and-above piecemeal growth, e.g. in respect of achieving regulated operational emissions that exceed the requirements of Building Regulations, and perhaps also unregulated emissions (e.g. embodied carbon in building materials). However, in this instance it is not clear that the larger housing site option (South of Moreton Lane) leads to any opportunity over-and-above the smaller site (Oxford Road).

In **conclusion**, the primary consideration here is judged to be flood risk affecting both of the housing site options. It is not possible to conclude with any certainty that there is a particular concern, even given uncertainties regarding climate change; however, at this stage it is judged appropriate to flag a 'moderate or uncertain' negative effect. The Environment Agency may wish to comment further through the current consultation.

- **Health and wellbeing** – both of the housing sites are associated with very good potential to deliver new community and green/blue infrastructure, to the benefit of new and existing residents.

With regards to green/blue infrastructure, as per the discussion above under 'biodiversity', there is an argument to suggest that South of Moreton Lane gives rise to the more significant opportunity.¹² Furthermore, the proposal for South of Moreton Lane is to deliver a new community hub and land for a primary school, plus the site is adjacent to the Phoenix Trail cycle path.¹³ A public right of way passes through the site, linking Thame to Moreton, but there is little reason to suggest that development would reduce the activeness of this as a walking route (the proposal is to deliver the primary school and community hub either side of the path).

In **conclusion**, both of the housing site options are supported, from a health and wellbeing perspective, but South of Moreton Lane is considered to represent a particular opportunity.

- **Historic environment** – this is a key consideration locally, given: A) Thame's heritage as a market town situated within a characteristic low-lying farmed landscape associated with the confluence of the River Thame and Cuttle Brook, as reflected in the extensive town centre conservation area and historic villages, hamlets and farmsteads linked to the town (most notably Moreton to the South and Towersey to the east); and B) very extensive and significant archaeology, as explained in a detailed note provided by the County Council in January 2022 (with specific referenced to all of the sites in question). Taking the four sites in turn:

- Oxford Road – is highly sensitive in archaeological terms, with the County Council explaining that investigations *"have revealed over 5000 years of human occupation to be present in this area, most significantly represented by the discovery of a triple ditched early Neolithic causewayed enclosure. Other Neolithic features such as a possible henge and a series of pits were also recorded as was considerable surviving remains of an Iron Age, Roman and Saxon settlement."* In this light, the proposal is to leave the primary area of archaeological interest undeveloped and to make the land accessible as open space. This could have the effect of increasing appreciation of the asset, as the land is not currently accessible; however, it is recognised that built form will have an effect on the setting of the asset.

In addition to the archaeological constraint, there would also be development adjacent to Thame Conservation Area. A particular concern relates to impacts to a sensitive view from Oxford Road, specifically a view to the north along the Cuttle Brook Corridor. This matter is currently being examined closely through planning application P22/S2418/FUL (77 homes). There is also a need to consider east-bound traffic passing through the conservation area.

- South of Moreton Lane – is not known to be significantly constrained in archaeological terms, but there is a need to consider the landscape gap between Thame and the Moreton Conservation Area, mindful that a public footpath passes through the site linking the two settlements. However, the proposal is to deliver a significant landscape buffer at the southern extent of the scheme, such that the remaining landscape gap will be ~1km. A further consideration is an adjacent site of a former windmill (shown on pre-WWI OS map); however, it is noted that there is already an adjacent consented housing scheme.
- Rycote Lane – is subject to the same archaeological constraint discussed above in respect of Oxford Road. However, unlike Oxford Road there is a need for further work to confirm precisely how to address the constraint, i.e. there remains a need for further archaeological evaluation to inform a decision on measures required that preserve features of interest.
- Howlands Road – is located in an area of archaeological interest, but there is little reason to suggest a degree of constraint similar to that discussed above in respect of Oxford Road and Rycote Lane. There are also non-listed historic farm buildings.

In **conclusion**, it is difficult to differentiate between the scenarios, as all of the sites are subject to a degree of constraint and have been the focus of varying levels of work in respect of avoidance and mitigation. On balance, it is appropriate to flag a particular concern / risk under scenarios involving allocation of both Oxford Road and Rycote Lane. Historic England and/or Oxfordshire County Council may wish to comment further through the consultation.

- **Landscape** – greatest concern is associated with the two employment sites, as they are located outside of the ring road. In particular, Howland Road would be prominent in the landscape along the historic road link between Thame and Towersey. Also, it could be appropriate to consider this site alongside the housing site option to the north ('East of Thame'), which is not progressed to the reasonable alternative growth scenarios at the current time (see Section 5). With regards to Rycote Lane, there is a need to note the nearby employment site under construction and adjacent committed site for a new cattle market.

¹² In addition to a 4.4 ha extension to the Cuttle Brook Local Nature Reserve, the proposal is to deliver 3.5 hectares of open space within the scheme, such that the overall proposal is to deliver nearly 8 ha of new accessible greenspace.

¹³ Furthermore, the site promoters state: *"The length of the Phoenix Trail to the north of the site is in the same ownership as [the site] and currently leased to Sustrans. This would be provided in perpetuity to Sustrans as part of the wider site proposals."*

With regards to the housing site options, South of Moreton Lane is also associated with a degree of landscape constraint, given the landscape gap to Moreton (as discussed above), whilst Oxford Road is considered to perform well in landscape terms.

In **conclusion**, it is possible to identify Scenarios 5 and 6 as least preferable; however, even under these two scenarios, negative landscape impacts would be of limited significance.

- **Land, soil, water** – a key consideration here is agricultural land quality, with the low resolution / low accuracy nationally available dataset suggesting a higher prevalence of better quality (grade 2) land to the south (South of Moreton Lane) and to the east (Howland Road) than to the west (Oxford Road and Rycote Lane) of Thame. Detailed survey information has not been submitted for any of the four sites in question (something that could be addressed prior to plan finalisation).

Another consideration under this heading can relate to capacity for additional wastewater treatment, but there is no available evidence of any particular issue at the Thame treatment works (located close to the Oxford / Aylesbury Road). The Environment Agency, Thames Water and/or the River Thame Conservation Trust may wish to comment through the consultation (including in respect of any barriers to a high housing growth strategy along the lines of Scenario 6).

Another potential issue is the undue sterilisation of minerals resources, but Thame is not associated with a Minerals Strategic Resources Area (as defined by the Oxfordshire Minerals and Waste Plan). Finally, there is a need to avoid hindering waste management operations and, in this respect, it is important to note that Rycote Lane (under consideration for employment) is in close proximity to a safeguarded waste operation, ASM Autos.

In **conclusion**, it is appropriate to highlight the two sites to the west of Thame as performing well in respect of agricultural land quality. Whilst it is not known whether the land in question is grade 3a (and therefore 'best and most versatile', BMV) or grade 3b (not BMV), it is likely to be the case that the land is lower quality than is the case for the other two sites in question.

- **Population and communities** – there are a range of important considerations here, over-and-above those already discussed under 'health and wellbeing'.

Firstly, with regards to **housing** needs, it is fair to support the highest growth scenario, despite this involving planning for a quantum of homes significantly above the local plan requirement (for the plan period). As well as generally recalling the Government's ambition of "significantly boosting the supply of homes" (NPPF para 60), it is likely that there is a need for affordable housing locally (social rent, affordable rent, affordable home ownership) over-and-above that which would be delivered under a scenario whereby the local plan housing requirement is met.

The next key consideration is **employment land** needs, both those clearly arising locally and wider strategic needs / opportunities, recognising that Thame is strategically located between Oxford and Aylesbury (and well connected to the M40), within the Oxford to Cambridge (OxCam) Arc. This serves to suggest support for the highest employment growth scenario. Also, further work is needed to confirm the capacity of Rycote Lane in light of archaeological constraints. Finally, in respect of employment land, whilst both sites are suitably well-located in terms of access to the strategic road network, Rycote Lane is better connected to the M40.

Focusing on the two housing options, **other considerations** have mostly already been covered above. Both sites would deliver, or facilitate delivery of, significantly more than just new housing, and this is most notably the case for South of Moreton Lane; however, there is an argument to suggest that Oxford Road is preferable in transport-terms.

In **conclusion**, under this heading it is considered appropriate to state support for higher growth scenarios, particularly in terms of employment land.

- **Transport** – the Oxford Road housing site option is judged to be preferable in transport terms, given very good proximity and connectivity to the town centre, as well as the strategic road network and bus routes (enabling connectivity by bus to Oxford, as well as Aylesbury and Haddenham and Thame train station). However, it is recognised that detailed transport work has been completed by the South of Moreton Lane site promoter with a view to demonstrating suitable transport connectivity, including the suitability of a single road access point from the east, via a recent housing site. With regards to the two employment sites, as discussed above, both sites are broadly suitably located in transport terms, but there is a preference for Rycote Lane, which is very well-located in respect of the strategic road network and also in terms of bus connectivity.

In **conclusion**, Scenario 1 (Oxford Rd and Rycote Lane) performs best, and it is fair to predict moderate or uncertain positive effects in respect of the transport baseline / transport objectives.

7. The preferred approach

Introduction

- 7.1 The aim of this section is to present the Town Council's response to the assessment presented above.

Reasons for supporting Scenario 1

- 7.2 The following text was provided by the Town Council's planning officer:

“Scenario 1 is supported on balance, in light of the assessment. It performs well in a number of respects, although it is recognised that the assessment serves to highlight certain arguments for an alternative approach.

With regards to housing, Oxford Road is judged to perform strongly overall, even after account is taken of the potential need to avoid and mitigate landscape and historic environment concerns. Whilst South of Moreton Lane has the potential to deliver significant community and green infrastructure, it is sequentially less preferable and would involve a number of homes significantly above the number required by the South Oxfordshire Local Plan.

With regards to employment land, Rycote Lane is the preferable site. It is, however, recognised that there are certain arguments for a quantum of new employment land above that which could be delivered at Rycote Lane, once account is taken of onsite constraints. This is a matter that will likely require further consideration subsequent to this round of consultation.”

Part 2: What are the SEA findings at this stage?

8. Introduction (to Part 2)

- 8.1 The aim here is to present assessment findings and recommendations in relation to the current draft ('pre-submission') version of the TNP2.
- 8.2 In practice, this means presenting re-presenting the assessment of Growth Scenario 1 (as assessed above, in Section 6) alongside consideration of wider aspects of the plan, including development management' policies.

Overview of the TNP2

- 8.3 The plan document presents 32 policies under five thematic headings. Of key importance (in terms of generating significant effects) is Policy GDH1, which present housing allocations (two committed, on small site associated with limited issues and Oxford Road, which is a focus of assessment in Section 6). Also, Policy GDE1, which presents employment allocation Rycote Lane.

Assessment methodology

- 8.4 The assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping (see **Table 3.1**) as a methodological framework.
- 8.5 Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the policies under consideration and understanding of the baseline that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text as far as possible (given a need for conciseness). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the draft plan in more general terms.
- 8.6 Finally, it is important to note that effects are predicted taking account Schedule 1 of the SEA Regulations. As part of this consideration is given to cumulative effects, i.e. effects in combination with other plans, programmes and projects.

9. Assessment of the TNP2

9.1 A discussion is presented under each of the thematic headings that together comprise the core of the SEA framework (see Section 3).

Biodiversity

9.2 Beginning with the site allocations, there are no issues in respect of proximity to a nationally designated Sites of Special Scientific Interest (SSSIs), nor locally designated Local Wildlife Sites (LWSs). Neither is it the case that any of the sites in question intersect non-designated priority habitat.

9.3 In this light, the key considerations are:

- The close association of **Oxford Road** (150 homes) with the Cuttle Brook corridor (and the confluence of the Cuttle Brook and the River Thames, in the case of Oxford Road). This is a sensitivity; however, in practice there is clear potential to support the achievement of significant enhancements, in terms of biodiversity / functioning of the river corridor and also recreational access. Site specific policy requires: *“An area of parkland shall be provided within the flood plain. This shall include wetland areas with paths through...”*
- A mature historic hedgerow (shown on the pre-1914 OS map) at the western edge of **Reagent Diagnostics** (25 homes), also noting proximity of the site to Thames Park, as well as hedgerow connectivity. However, there will be little if any loss of hedgerow, there will be a buffer between built form and the hedgerow and the proposal is to create / restore a hedgerow at the eastern edge of the site. Further requirements might be set through policy.

9.4 With regards to thematic policies, none give rise to any significant tensions with the achievement of biodiversity objectives. **Policy NEB1**: Biodiversity is obviously supported, with particular support for the requirement to liaise with Thames Valley Environmental Record Centre (TVERC) and also for the policy focus on habitat / ecological connectivity and biodiversity at landscape scales (i.e. looking beyond development site boundaries). In respect of Biodiversity Net Gain (BNG) it will be important to account for latest national guidance / understanding of best practice nationally, including in respect of the question of offsite measures (i.e. generation of biodiversity credits) close to a development site versus further afield (which can allow for more strategic enhancements).

9.5 Another policy that performs notably well is Policy NEC1: The Cuttle Brook. It is noted that the defined corridor is currently bounded by the Oxford Road to the north and the Phoenix Trail to the south, hence consideration might be given to an expanded corridor designation.

9.6 In **conclusion**, the proposed allocations are associated with limited sensitivity and a degree of opportunity, and Policy NEB1 is strongly supported. In turn, it is possible to predict **moderate or uncertain positive effects**.

Climate change

- 9.7 Beginning with the site allocations, a detailed discussion covering a range of issues, in respect of both mitigation and adaptation, is presented in Section 6, with the conclusion reached that a key consideration is in respect of flood risk (which is something that could worsen nationally due to climate change).
- 9.8 Both of the non-committed allocations (Oxford Road and Reagent Diagnostics) are closely associated with the river corridor, and this is particularly the case for **Oxford Road**, which intersects the flood risk zone. However, the clear expectation is that there will be no built form in the flood risk zone (see discussion above, under 'biodiversity'). However, further consideration might be given to the extent to which it is appropriate to buffer the flood risk zone, to allow an allowance for climate change scenarios, and it is noted that a buffer zone could also have wider benefits, particularly as this part of the Cuttle Brook corridor is associated with valued view north from Oxford Road, within the Thame Conservation Area.
- 9.9 With regards to thematic policy, it is difficult to suggest with any certainty that any of the proposed policies give rise to significant tensions with climate change objectives (in respect of either mitigation or adaptation). A number of policies are broadly supportive of climate change objectives, but the two key policies for discussion here are as follows:
- **Policy CPQ5:** Sustainable Design and Construction – notably requires that 'zero carbon' is "targeted" (which would involve development going significantly beyond the requirements set out in Building Regulations) and, as part of this, "encourages" homes to be built to the Passivhaus standard. New homes built to Passivhaus standard - which involves very high thermal efficiency - are typically able to achieve overall zero carbon via extensive use of rooftop solar panels. However, Passivhaus involves a significant additional building cost, which impacts on development viability. In turn, there is a need to support sites with strong viability.
 - **Policy NEF1:** Flood risk and sustainable drainage – notably includes a range of guidance aimed at ensuring good practice in respect of Sustainable Drainage Systems (SuDS) which, by managing surface water run-off, are important not only for flood risk but also water quality.
- 9.10 In **conclusion**, there will be a need for further detailed consideration in respect of flood risk affecting the main proposed allocation (Oxford Road); however, on the other hand, proposed Policy CPQ5 is supported from a climate change mitigation perspective. On balance overall **neutral effects** are predicted.

Health and wellbeing

- 9.11 As discussed, there is strong support for the proposal at Oxford Road to deliver significant new green and blue infrastructure alongside new homes. Site-specific policy also notably requires: *"Walking routes shall be provided that connect development with the surrounding open space and footpath network, including along the Cuttle Brook."*

9.12 With regards to thematic policy, it is difficult to suggest that any of the proposed policies give rise to significant tensions with health and wellbeing objectives. Conversely, numerous policies are broadly supportive of health and wellbeing objectives, including those supportive of walking and cycling, which are a focus of discussion below, under ‘transport’. Policies for discussion here are:

- **Policies SFO2 and SFO3** - deal with existing and new open spaces in turn. In particular SFO3 lists a number of important principles to guide the design of new greenspace where this is to be delivered alongside new homes.
- **Policy GAP1:** The Phoenix Trail – requires that: *“Where development is proposed adjacent to the Phoenix Trail opportunities should be taken that support improvements to access and use of the Trail.”*

9.13 In **conclusion**, the main proposed allocation (Oxford Road) is supported, and a range of proposed thematic policies are also broadly supported from a health and wellbeing perspective. In turn, it is possible to predict **moderate or uncertain positive effects**.

Historic environment

9.14 This is a key consideration locally, for reasons that are introduced in Section 6. Beginning with proposed allocations, the largest of these – **Oxford Road** – is associated with considerable sensitivity, both in terms of:

- Archaeology – as explained by the County Council, investigations “have revealed over 5000 years of human occupation to be present in this area, most significantly represented by the discovery of a triple ditched early Neolithic causewayed enclosure. Other Neolithic features such as a possible henge and a series of pits were also recorded as was considerable surviving remains of an Iron Age, Roman and Saxon settlement.” In this light, the proposal is to leave the primary area of archaeological interest undeveloped and to make the land accessible as open space. This could have the effect of increasing appreciation of the asset, as the land is not currently accessible; however, it is recognised that built form will have an effect on the setting of the asset.
- Thame Conservation Area – there is a concern regarding impacts to a sensitive view from Oxford Road, specifically a view to the north along the Cuttle Brook Corridor. This matter is currently being examined closely through planning application P22/S2418/FUL (77 homes). There is also a need to consider east-bound traffic passing through the conservation area.

9.15 The proposed employment allocation - **Rycote Lane** - is also subject to the same archaeological constraint discussed above in respect of Oxford Road. However, unlike Oxford Road there is a need for further work to confirm precisely how to address the constraint, i.e. there remains a need for further archaeological evaluation to inform a decision on measures required that preserve features of interest.

9.16 Finally, there is a need to note Policy GDR1: **Cattle Market**, which is a sensitive town centre allocation, albeit one that gained wide support as a previously allocated mixed-use scheme. Design principles have been established through a detailed Masterplanning Report, and include:

“Development must create a positive building frontage onto North Street that respects the character and scale of the surrounding area, including the Conservation Area.”

- 9.17 With regards to thematic policy, it is difficult to suggest with any certainty that any of the proposed policies give rise to significant tensions with historic environment objectives. There are no historic environment focused policies, however, **Policy CPQ1: Design in Response to Local Character** is of note for requiring that ‘context’ is a fundamental consideration, specifically:

“Development should create a positive relationship between the site and the existing built-up area, including use of materials and architectural details.”

- 9.18 In conclusion, at the current time there are a number of outstanding matters for detailed consideration in respect of both Oxford Road and Rycote Lane, such that it is appropriate to flag a **moderate or uncertain negative effect**.

Landscape

- 9.19 The proposed employment land allocation – **Rycote Lane** – is subject to a degree of constraint on account of being located outside of the ring road. In many respects **Oxford Road** is quite unconstrained; however, as discussed above, there is the specific matter of a sensitive view north from Oxford Road along the Cuttle Brook.

- 9.20 With regards to thematic policies, it is again **Policy CPQ1: Design in Response to Local Character** that is of particular note. A key requirement is that:

“Applicants are required to demonstrate how proposals for development have been informed by and respond to the qualities identified in the Thame Neighbourhood Plan Design Code and Character Area Study (Appendix 1) and which reflect good practice principles. Support will be given to those proposals which help contribute towards opportunities for enhancing the character of each area as identified in the Character Area Assessment.”

- 9.21 In **conclusion**, the proposed allocations give rise to a degree of landscape concern. However, on the other hand, the plan includes a strong focus on ‘design in response to local character’, which is supported. Also, there is a need to recognise that adopting the plan will reduce the risk of unplanned development, potentially at locations are sensitive in landscape terms. On balance, overall **neutral effects** are predicted.

Land, soil, water

- 9.22 As discussed in Section 6, a key consideration is agricultural land quality and, in this respect, there is tentative support (on the basis of limited data) for the main to proposed allocations, namely **Oxford Road** and **Rycote Lane**. Specifically, there is the possibility of land here not falling into the ‘best and most’ versatile category.

- 9.23 With regards to thematic policy, there is a notable focus on water efficiency within **Policy CPQ1**. Also, **Policy CPQ8: Paving of front gardens** is supported.

- 9.24 In **conclusion**, broadly neutral effects are predicted.

Population and communities

9.25 With regards to the proposed allocations, there are a range of important considerations here, over-and-above those already discussed under ‘health and wellbeing’.

9.26 Firstly, with regards to **housing needs**, there is support for providing for a quantum of homes (over the plan period) above the local plan requirement. This is appropriate as a contingency for any unforeseen delivery issues, and mindful of the importance of supporting additional affordable housing.

9.27 The next key consideration is **employment land need/demand** and, in this respect, there is a need to consider very locally arising needs as well as wider strategic needs/demand and identified opportunity, recognising that Thame is strategically located between Oxford and Aylesbury (and well connected to the M40), within the Oxford to Cambridge (OxCam) Arc. It could well be that Rycote Lane is sufficient on its own, but there is a need to maintain a watching brief, with a view to possibly looking again at allocating the larger of the two employment site options discussed in Section 6, namely Howlands Road.

9.28 With regards to thematic policies, a range are focused strongly on the achievement of communities-related objectives. However, the key policy for discussion here is **Policy GDH3**: Housing type, tenure and mix, with the background text to the policy explaining:

“The HNA found that Thame has a relatively high proportion of ownership tenures when compared to the national and district average. The high proportion of ownership tenures come at the expense of a lower proportion of social and private rent tenures when making the same comparisons. Overall, the high rate of ownership tenures, in combination with a high average house price (which has risen on average 62% since 2011) has resulted in Thame becoming a challenging area to get onto the ownership property ladder.”

9.29 In this light, the policy requires that:

- On developments of ten or more homes, 40% of those homes must comprise affordable housing; and
- Provision of affordable homes should be split such that 65% takes the form of rented tenures, including social and affordable rent, while the remaining 35% comprises affordable routes to home ownership.
- Priority is to be given to the delivery of affordable rented tenures in the early years of the Plan period.

9.30 The other key policy for consideration here is **Policy SF01**: Community Facilities and Services. This sets out clear priorities, in respect of new or improved facilities (*“including nursery provision, a community hall or centre, and a youth centre”*) that would be supported should the opportunity arise (e.g. alongside housing development) that would be supported should a proposal be submitted (potentially alongside proposed housing growth).

9.31 In **conclusion**, **significant positive effects** are predicted having accounted for the proposed growth / spatial strategy alongside thematic policy.

Transport

9.32 As discussed in Section 6, both of the main proposed allocations – **Oxford Road** (~150 homes) and **Rycote Lane** (employment) - are supported from a transport perspective, given connectivity by road, active travel and public transport (specifically bus connectivity).

9.33 With regards to thematic policies, a range are focused strongly on the achievement of transport objectives, for example:

- **Policy GAAT1:** Active Travel – sets out a number of active travel criteria to be met as part of development proposals, for example:

“Reflect best practice principles for active travel design with the design of new cycle routes incorporating the guidance set out in DfT Cycle Infrastructure Design LTN 1/2063, or successor guidance, as well as DfT guidance in respect of inclusive mobility⁶⁴. The principles established in Building for a Health Life, shall also be utilised by applicants to inform the design of safe, attractive and effective active travel infrastructure and, where possible, improve conditions for all.”

- **Policy GAPT1:** Public Transport – supports proposals that involve improved bus services and or supporting infrastructure. Also, and importantly, the policy states the following, which is likely to be justified in the context of Thame, given limited access to a train station:

“Major new development will be supported provided it is located within walking distance (400 metres) of a frequent bus service, with the 400 metre distancing referring to the actual walking distance as opposed to as the crow flies. Alternatively, proposals for major development outside of the 400 metre walking distance of a bus stop will be supported where they are able to incorporate new bus routes and services for residents.”

- **Policy GAM1:** Mobility Hubs and EVs – supports development which incorporates and helps deliver a network of mobility hubs across Thame.
- **Policy GAA1:** Alleyways – supports passive surveillance.

9.34 In **conclusion**, **significant positive effects** are predicted having accounted for the proposed growth / spatial strategy alongside thematic policy.

Conclusions on the draft plan

9.35 The appraisal predicts significant positive effects under two topic headings (communities and transport), moderate or uncertain positive effects under two topic headings (biodiversity and health), neutral effects under three headings (climate change, landscape and land / soil / water) and moderate or uncertain negative effects under just one topic heading (historic environment).

9.36 No specific recommendations are made as part of the appraisal; however, the appraisal raises a number of issues that will need to be given further consideration prior to plan finalisation, alongside consultation responses.

Part 3: What are the next steps?

10. Next steps

Plan finalisation

- 10.1 This Environmental Report is published for consultation alongside the draft ('pre-submission') version of TNP2. As discussed in Section 1, the aim of this report is to inform the consultation and subsequent plan finalisation.
- 10.2 Following the consultation the plan will be updated for submission. The Environmental Report will be updated only if necessary.
- 10.3 After being submitted to South Oxfordshire District Council, there will be a further opportunity for consultation (Regulation 16 'Publicity'). It will be for an Independent Examiner to consider consultation responses received as part of an examination process focused on testing whether the TNP2 meets the Basic Conditions for Neighbourhood Plans and confirming that it is in general conformity with the South Oxfordshire Local Plan.
- 10.4 If the independent examination is favourable, the TNP2 will be subject to a referendum. If more than 50% of those who vote agree with the TNP2, then it will be 'made'. Once made, the TNP will become part of the Development Plan for South Oxfordshire.

Monitoring

- 10.5 The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report.
- 10.6 It is anticipated that monitoring of effects of the TNP2 will be undertaken by South Oxfordshire District Council. The SEA has not identified any potential for significant negative effects that would require closer monitoring, led by the Town Council. However, one matter that could be explored is monitoring of rates of active travel use of public transport.

Appendices

Appendix I: Legal checklist

As discussed in Chapter 1 above, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 (the Regulations) explains the information that must be contained in the Environmental Report; however, interpretation of Schedule 2 is not straightforward. Table AI.1 links the structure of this report to an interpretation of Schedule 2 requirements, whilst Table AI.2 explains this interpretation. Table AI.3 identifies how and where within this report the requirements have/ will be met.

Table AI.1: Questions answered by this report, in-line with an interpretation of regulatory requirements

		Questions answered	As per regulations, the report must include...
Introduction		What's the plan seeking to achieve?	<ul style="list-style-type: none"> ▪ An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the SEA scope?	What's the sustainability 'context'?	<ul style="list-style-type: none"> ▪ Relevant environmental protection objectives, established at international or national level ▪ Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What's the sustainability 'baseline'?	<ul style="list-style-type: none"> ▪ Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan ▪ The environmental characteristics of areas likely to be affected ▪ Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> ▪ Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SEA involved up to this point?	<ul style="list-style-type: none"> ▪ Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) ▪ The likely significant effects associated with alternatives ▪ Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan 	
Part 2	What are the SEA findings at this current stage?	<ul style="list-style-type: none"> ▪ The likely significant effects associated with the draft plan ▪ The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan 	
Part 3	What happens next?	<ul style="list-style-type: none"> ▪ A description of the monitoring measures envisaged 	

Table AI.2: Interpretation of the regulations

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;	The relevant environmental protection objectives, established at international or national level	
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The environmental characteristics of areas likely to be significantly affected	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues & objectives?</i>
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal	
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
(i) a description of the measures envisaged concerning monitoring.	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]

Table AI.3: ‘Checklist’ of how (throughout the SEA process) and where (within this report) regulatory requirements are met

Regulatory requirement	How requirement is met
A) The Environmental Report must present certain information	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 2 (‘What is the plan seeking to achieve’) presents this information.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters have been considered in detail through scoping work, which has involved dedicated consultation on a Scoping Report, which is available on the Town Council’s website. The ‘SEA framework’ – the outcome of scoping – is presented within Chapter 3 (‘What is the scope of the SEA?’).
3. The environmental characteristics of areas likely to be significantly affected;	
4. Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	
5. The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The SEA framework is presented within Chapter 3 (‘What is the scope of the SEA’). With regards to explaining “ <i>how...considerations have been taken into account</i> ”, Chapter 7 explains the Town Council’s ‘reasons for supporting the preferred approach’, i.e. explains how/ why the preferred approach is justified in light of alternatives.
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	Chapter 6 presents alternatives assessment findings (in relation to housing and employment growth, which is a ‘stand-out’ plan policy area). Chapters 9 presents an assessment of the draft plan. With regards to assessment methodology, Chapter 8 explains the role of the SEA framework/scope, and the need to consider the potential for various effect characteristics/ dimensions, e.g. timescale.

Regulatory requirement	How requirement is met
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	The assessment highlights certain tensions with environmental and wider sustainability objectives, which might potentially be actioned when finalising the plan.
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapters 4 and 5 deal with 'Reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on particular issues and options ('scenarios'). Also, Chapter 7 explains the Town Council's reasons for selecting the preferred option (in-light of alternatives).
9. Description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter 11 presents measures envisaged concerning monitoring.
10. A non-technical summary of the information provided under the above headings	TBC
B) The Report must be published for consultation alongside the draft plan	
Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	At the current time, this report is published for consultation alongside the draft plan, in order to inform the consultation.
C) The report must be taken into account, alongside consultation responses, when finalising the plan	
The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	This report, and consultation responses received, will be taken into account when finalising the plan.

Appendix 2: Housing site options

Introduction

The aim of this appendix is to supplement the discussion of ‘site options’ presented in Section 5. Specifically, it presents a comparative assessment of three of the four housing site options published for consultation in 2021/22 (specifically, all bar High Field, which performs relatively poorly, as per the discussion in Section 5).

Methodology

For each element of the SEA Framework (see Section 3), the aim is simply to rank the competing site options in order of performance (where 1 is best performing).

Comparative assessment

Comparative assessment of housing site options

Topic	Oxford Road	East of Thame	South of Moreton Lane
Biodiversity	★1	2	★1
Climate change	2	★1	2
Health	2	3	★1
Historic env	3	★1	2
Landscape	★1	3	2
Land, soil, water	★1	2	2
Population / communities	2	3	★1
Transport	★1	2	2

Discussion

It is not the aim of this assessment to arrive at a conclusion regarding an order of preference, nor to conclude on any one site as best or worst performing. That is because the assessment is undertaken without any assumptions regarding the degree of importance, or ‘weight’, that should be assigned to each of the topics that together comprise the SEA framework. However, having said this, it is immediately apparent from the assessment that East of Thame is found to perform best in terms of the fewest number of topics, and to perform least well under the most number of topics.

Having made these initial points, the following bullets consider each topic in turn:

- **Biodiversity** – there are no issues in respect of proximity to a nationally or locally designated sites; nor is it the case that any of the sites in question intersect non-designated priority habitat; nor do there appear to be any major concerns in respect of loss of / impacts to mature historic hedgerows (there is a notable mature hedgerow at the northern edge of South of Moreton Lane). In this light, the key consideration is the close association of two of the site options with the Cuttle Brook corridor (and the confluence of the Cuttle Brook and the River Thame, in the case of Oxford Road). On the one hand this suggests a degree of sensitivity; however, on the other hand, both sites are associated with clear potential to deliver / facilitate significant enhancements, in terms of biodiversity / functioning of the river corridor and also recreational access. The opportunity could be particularly significant in respect of South of Moreton Lane, where the site promoters propose a 4.4 ha extension to the Cuttle Brook Local Nature Reserve.

- **Climate change** – beginning with the matter of **climate change adaptation** / resilience to anticipated effects of climate change, flood risk is typically a primary consideration, and this applies strongly locally, given the close association of Thame with the Cuttle Brook and the River Thame. Two of the housing site options intersect fluvial flood zones; however, in both cases detailed work has been completed to demonstrate the potential to avoid development within, and suitably buffer, the flood zone. Oxford Road potentially gives rise to greater concern regarding development in close proximity to the flood risk zone (mindful of flood zones expanding under climate change scenarios), but Land South of Moreton Lane feasibly gives rise to a degree of concern on the basis of being upstream of Thame (although, on the other hand, it could feasibly be the case that development supports enhancement of the river corridor such that there is an improvement to flood water storage capacity and, in turn, reduced downstream flood risk).

Moving onto **climate change mitigation** / decarbonisation, the primary consideration is minimising per capita greenhouse gas emissions from **transport**, which primarily means minimising the need to travel and supporting a modal shift away from the private car. In this respect, East of Thame performs less well, as it is less well-related to the town centre; however, it is recognised that certain key facilities are located in nearby, and there is also good bus connectivity. Another consideration is the scale of housing growth that would be delivered at each of the sites, as there is an argument for delivering housing growth at Thame in line with the local plan requirement, rather than significantly exceeding this (e.g. via allocation of South of Moreton Lane), mindful that there could be alternative locations for growth that are preferable to Thame in terms of transport-related greenhouse gas emissions (e.g. towns with a train station).

Finally, with regards to the objective of minimising per capita greenhouse gas emissions from the **built environment**, growth at scale can give rise to opportunities, over-and-above piecemeal growth, e.g. in respect of achieving regulated operational emissions that exceed the requirements of Building Regulations, and perhaps also unregulated emissions (e.g. embodied carbon in building materials). However, in this instance it is not clear that the larger housing site options lead to any opportunity over-and-above the smaller site (Oxford Road).

In conclusion, the primary consideration here is judged to be flood risk affecting two of the sites.

- **Health and wellbeing** – two of the sites perform well, in that there is the potential for housing growth to deliver significant new community and green/blue infrastructure, to the benefit of both new and existing residents. With regards to green/blue infrastructure, as per the discussion above under 'biodiversity', there is an argument to suggest that South of Moreton Lane gives rise to the more significant opportunity.¹⁴ Furthermore, the proposal for South of Moreton Lane is to deliver a new community hub and land for a primary school, plus the site is adjacent to the Phoenix Trail cycle path.¹⁵ A public right of way passes through the site, linking Thame to Moreton, but there is little reason to suggest that development would reduce the activeness of this as a walking route (the proposal is to deliver the primary school and community hub either side of the path).
- **Historic environment** – this is a key consideration locally, given: A) Thame's heritage as a market town situated within a characteristic low-lying farmed landscape associated with the confluence of the River Thame and Cuttle Brook, as reflected in the extensive town centre conservation area and historic villages, hamlets and farmsteads linked to the town (most notably Moreton to the South and Towersey to the east); and B) very extensive and significant archaeology, as explained in a detailed note provided by the County Council in January 2022.

¹⁴ In addition to a 4.4 ha extension to the Cuttle Brook Local Nature Reserve, the proposal is to deliver 3.5 hectares of open space within the scheme, such that the overall proposal is to deliver nearly 8 ha of new accessible greenspace.

¹⁵ Furthermore, the site promoters state: "The length of the Phoenix Trail to the north of the site is in the same ownership as [the site] and currently leased to Sustrans. This would be provided in perpetuity to Sustrans as part of the wider site proposals."

Taking the three sites in turn:

- Oxford Road – is highly sensitive in archaeological terms, with the County Council explaining that investigations “*have revealed over 5000 years of human occupation to be present in this area, most significantly represented by the discovery of a triple ditched early Neolithic causewayed enclosure. Other Neolithic features such as a possible henge and a series of pits were also recorded as was considerable surviving remains of an Iron Age, Roman and Saxon settlement.*” In this light, the proposal is to leave the primary area of archaeological interest undeveloped and to make the land accessible as open space. This could have the effect of increasing appreciation of the asset, as the land is not currently accessible; however, it is recognised that built form will have an effect on the setting of the asset.

In addition to the archaeological constraint, there would also be development adjacent to Thame Conservation Area. A particular concern relates to impacts to a sensitive view from Oxford Road, specifically a view to the north along the Cuttle Brook Corridor. This matter is currently being examined closely through planning application [P22/S2418/FUL](#) (77 homes). There is also a need to consider east-bound traffic passing through the conservation area.

- South of Moreton Lane – is not known to be significantly constrained in archaeological terms, but there is a need to consider the landscape gap between Thame and the Moreton Conservation Area, mindful that a public footpath passes through the site linking the two settlements. However, the proposal is to deliver a significant landscape buffer at the southern extent of the scheme, such that the remaining landscape gap will be ~1km. A further consideration is an adjacent site of a former windmill (shown on pre-WWI OS map); however, it is noted that there is already an adjacent consented housing scheme.
- East of Thame – is located in an area of archaeological interest, but there is little reason to suggest a degree of constraint similar to that discussed above in respect of Oxford Road.

In conclusion, East of Thame is subject to least constraint. Oxford Road is arguably subject to highest constraint, but this is potentially marginal given good potential for avoidance/mitigation.

- **Landscape** – East of Thame gives rise to the greatest degree of concern, as it is located, and this is slightly raised land (in an otherwise generally flat and low lying landscape). South of Moreton Lane is also associated with a degree of landscape constraint, given the landscape gap to Moreton, as discussed above, whilst Oxford Road is subject to the lowest constraint.
- **Land, soil, water** – a key consideration here is agricultural land quality, with the low resolution / low accuracy nationally available dataset suggesting a higher prevalence of better quality (grade 2) land to the south (South of Moreton Lane) and to the east (East of Thame) than to the west (Oxford Road) of Thame. Detailed survey information has not been submitted for any of the three sites in question (something that could be addressed prior to plan finalisation).

Another key consideration under this heading can relate to capacity for additional wastewater treatment, but there is no evidence available to suggest any particular issue at the Thame treatment works (located close to Oxford Road) that might suggest a need for lower growth.

Another potential issue is the undue sterilisation of minerals resources, but Thame is not associated with a Minerals Strategic Resources Area (ref. Oxfordshire Minerals and Waste Plan).

- **Population and communities** – an immediate consideration here is housing needs and, in this respect, it is fair to support the largest site (South of Moreton Lane), despite this involving planning for a quantum of homes over the plan period significantly above the local plan requirement. As well as generally recalling the Government’s ambition of “significantly boosting the supply of homes” (NPPF para 60), it is likely that there is a need for affordable housing locally (social rent, affordable rent, affordable home ownership) over-and-above the number of affordable homes that would be delivered under a scenario whereby the local plan housing requirement is met.

The other key consideration here is the potential to deliver / facilitate delivery of significantly more than just new housing and, in this respect, East of Thame performs less well, as discussed above.

In conclusion, whilst it is recognised that there is a need to avoid ‘double counting’ of effects, on balance it is appropriate to rank the options in the same way as under ‘health and wellbeing’.

- **Transport** – Oxford Road is judged to be preferable in transport terms, given very good proximity and connectivity to the town centre, as well as the strategic road network and bus routes. However, it is recognised that East of Thame is also well connected by road and bus services; and it is recognised that detailed transport work has been completed by the South of Moreton Lane site promoter with a view to demonstrating suitable transport connectivity, including the suitability of a single road access point from the east, via a recent housing site.



1. Introduction

This document is an addendum to the 'Environmental Report' submitted in support of the review of the Thame Neighbourhood Plan (TNP2).

This addendum is intended to compliment the environmental Report, reflecting the extent of changes made to TNP2 following consultation responses received at the Regulation 14 stage.

It comprises part of the suite of documents prepared as part of the Strategic Environmental Assessment (SEA) of TNP2. Together, they include:

- SEA Screening Questionnaire for Neighbourhood Plans submitted to South Oxfordshire District Council (SODC).
- SEA Screening Opinion prepared by SODC.
- SEA Scoping Report prepared by Aecom on behalf of Thame Town Council under the Locality Neighbourhood Plan Technical Support programme.
- Environmental Report prepared by Aecom on behalf of Thame Town Council under the Locality Neighbourhood Plan Technical Support programme

The Environmental Report assesses six 'reasonable alternative growth scenarios', with the outcome of this supporting the selection of the preferred growth scenario presented in the Regulation 14 version of TNP2.

2. Process

Planning Practice Guidance ([version published February 2015, updated December 2020](#)) establishes the SEA requirements for neighbourhood plans. This makes clear that where a neighbourhood plan has been 'screened in' for the purposes of SEA, then an Environmental Report needs to be prepared and submitted alongside the neighbourhood plan for examination purposes.

Planning Practice Guidance presents a flowchart showing the key stages in the preparation of a neighbourhood plan and the relationship between these stages and the SEA process. The flowchart is copied below (see Figure 1) for ease of reference.

Strategic environmental assessment process

Neighbourhood plan preparation

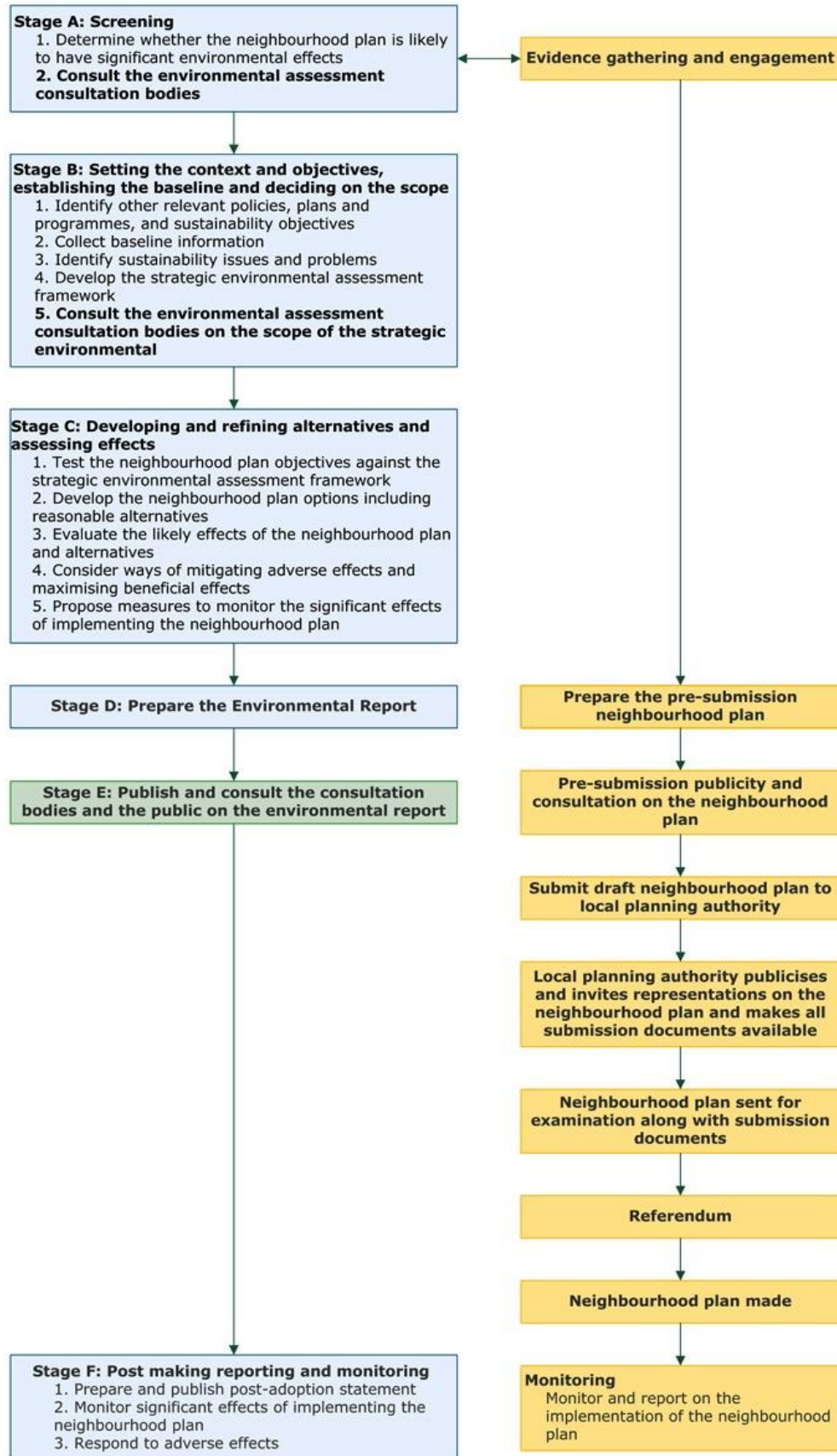


Figure 1: Neighbourhood Plan SEA process flowchart. Source: Planning Practice Guidance, [Paragraph: 033](#)
Reference ID: 11-033-20150209

The flowchart indicates that, after the Regulation 14 stage, there is no need for production of a final Environmental Report. It moves from publication of and consultation on the Environment Report as part of the Regulation 14 stage directly to submission and examination, with no further SEA stages involved until the Neighbourhood Plan is made and the monitoring process is triggered.

In respect of whether updates to the Environmental Report are required for the submission stage, Planning Practice Guidance (Paragraph: 041 Reference ID: 11-041-20140306) states:

The environmental report will not necessarily have to be amended if the neighbourhood plan is modified following responses to consultation. Modifications to the environmental report should be considered only where appropriate and proportionate to the level of change being made to the neighbourhood plan. A change is likely to be significant if it substantially alters the draft plan and or is likely to give rise to significant environmental effects. Further assessment may be required if the changes have not previously been assessed and are likely to give rise to significant effects.

Changes that are not significant will not require further environmental assessment work.

This is reflected in the Environmental Report prepared and consulted upon at the Regulation 14 stage. It states, under 'next steps', that the 'Environmental Report will only be updated as necessary'.

The Regulation 14 consultation of TNP2 lasted for a period of eight weeks, commencing on Monday 12th June and running until Monday 7th August 2023. All comments received were considered and changes made to the submission version of TNP2 as appropriate.

None of the changes made to TNP2 as a result of consultation are significant: the preferred growth scenario presented in the Regulation 14 consultation is retained as are all site allocations.

Changes made to TNP2 have resulted in some amendments to the policies presented in the Regulation 14 version, including the approach to development of allocated sites, but the overall thrust and direction of policy is retained, and these do not give rise to significant effects.

It has thus been determined that modifications to the Environmental Report are not necessary. Instead, and in the interests of transparency, this addendum to the Environmental Report has been prepared, summarising and commenting on the changes made to the submission version of TNP2 following the Regulation 14 consultation.

3. Commentary on changes

Changes made to TNP2 as a result of comments received at the Regulation 14 stage are set out in the Consultation Statement (see Volume 4). The main changes arising, and commentary on these, is presented in the following sections.

3.1 Housing requirement

Regulation 14 Policy Reference: Policy GDH1 – Housing Allocations

Submission version Policy Reference: Policy GHD1 – Housing Development and Allocations

The changes made to this policy and the supporting text comprise:

- Reduction to the housing requirement from 256 homes over the plan period to 143. This reflects monitoring of development that has come forward prior to production of the submission version of TNP2. This does not reduce the total number of new homes that are to be provided in Thame as required by SODC, rather that committed schemes contribute towards this. The impact of this has allowed the scale of proposed development at Oxford Road (see subsequent section) to be reviewed. Responses to the Regulation 14 consultation noted that proposed housing numbers should be scaled back to better respond to landscape matters and historic assets. The overall change in the housing number to be planned for does not have a significant effect as this is the outstanding balance to be met and the total number over the Plan period has not changed. The change in respect of Oxford Road has a positive effect as set out in the next section.
- The Policy has introduced reference to land at The Elms as a development site. Although not appearing in the Regulation 14 version of TNP2 it does not comprise a new allocation or development prospect. Rather it is a site that was allocated in the first Neighbourhood Plan (TNP1) and where planning permission has been approved but not yet implemented. It is thus a committed scheme and is included in TNP2 as a 'saved policy'. It does not give rise to any further effects. It is presented in TNP2 at Policy GDH1e: The Elms.
- Additional clauses have been added to the Policy that apply to all proposals for housing development, including any windfall sites that come forward. These have been copied across from the windfall housing policy that was included in the Regulation 14 version but since removed, as discussed further below. This does not result in any significant effects.

3.2 Oxford Road

Regulation 14 Policy Reference: Policy GDH1d – Land at Oxford Road

Submission version Policy Reference: Policy GDH1d – Land at Oxford Road

The following changes to the policy and associated masterplan have been made:

- The Environmental Report noted that development of land at Oxford Road would, overall, result in positive effects. However, it did raise the potential for moderate or negative effects in relation to the historic environment. Concerns about the impact of development on heritage assets were also raised by SODC in response to the Regulation 14 consultation. The masterplan process undertaken alongside TNP2 has been reviewed in light of this and has resulted in the extent

of the developable area being scaled back, allowing for (a) retention of views through to the cluster of listed farm buildings enjoyed from permissive footpaths and thus retaining an understanding of the relationship between Thame and its rural setting, and (b) views from Oxford Road out along the Cuttle Brook corridor to the surrounding landscape, minimising the risk of obstruction to this and retaining the interconnectivity between the Cuttle Brook and surrounding landscape. Although development arising as a result of the allocation will still impact on the historic environment the changes made seek to minimise this impact.

- The policy has also been strengthened to make clear that new areas of open space shall be provided as part of development of the site, that there should be no net loss of open space established in the first Neighbourhood Plan (TNP1), and that liaison with the Environment Agency is required in respect of impact on areas of flood risk. These do not represent significant changes.
- The result of the above has been to reduce the overall quantum of housing that it might be possible to accommodate on the site. The Regulation 14 version envisaged the site as accommodating 150 homes. This has been reduced to 100 homes in the submission version of TNP2. This does not give rise to a significant effect as the reduction is offset by committed schemes that have since come forward in Thame and thus make no change to the overall delivery of homes over the plan period.
- The reduction in the scale of development also avoids over-provision of housing away from alternative locations for growth that perform better than Thame in terms of transport and associated greenhouse gas emissions. The reduction in developed area will increase the buffer between development and the flood zone while reducing the volume of flood water storage required on-site.

The changes to the policy and associated Masterplan have had positive effects in terms of reducing potential carbon emissions from transport and reducing the impact of flood water both on and off site. This further favours the preferred growth scenario over the alternatives, or any potential variation.

2.3 Cattle Market

Regulation 14 Policy Reference: Policy GDR1 – The Cattle Market Site

Submission version Policy Reference: Policy GDR1 – The Cattle Market Site

The following changes have been made to this policy and the supporting masterplan report prepared alongside TNP2:

- The policy makes clear that town centre parking shall be retained on the site unless loss can be fully justified. This was included in the Regulation 14 version but, given consultation feedback, now comprises the first part of the policy, raising the importance of parking. Reordering of the policy does not result in any significant effects.

- The scale of the potential development has been scaled back such that it better responds to the context, including residential streets and the Town Centre Conservation area. This does not result in a significant effect. Indeed, it is considered to better respond to the setting and thus address concerns associated with the impact of development on residential amenity and the historic environment.
- Associated with the above, the policy no longer specifies a quantum of housing to be accommodated on site, though does say that housing does comprise an appropriate use as part of a mixed-use development. This is to provide greater flexibility in the approach to development which will be subject to more detailed masterplanning. This does not impact on the overall delivery of housing across Thame given a combination of existing commitments and the other allocated sites included in TNP2.

The Cattle Market was included across all the SEA growth scenarios. The proposed reduction in development including housing would again be applied equally across all the scenarios. The effect of the change is judged neutral.

2.4 Windfall Housing

Regulation 14 Policy Reference: Policy GDH2 – Windfall Housing Criteria

Submission version Policy Reference: Not included in a separate policy

- Comments to the Regulation 14 version of the Policy stated that clauses establishing a timeframe within which proposals for development would not be considered were too restrictive, would conflict with the SODC Local Plan, and should be deleted.
- Some of the other clauses were considered to duplicate the SODC and not necessary for inclusion in the Neighbourhood Plan.
- Remaining clauses present an approach to the spatial distribution of development responding to the character of Thame and objectives established, and which apply to all development proposals for new homes. These have been retained but amalgamated in an expanded version of Policy GDH1 as outlined above) and, insofar as they relate to design matters, Policy CPQ1 (Design in Response to Local Character). This does not result in a significant effect.

3.1 Windfall Employment

Regulation 14 Policy Reference: Policy GDE2 – Windfall Employment Proposals

Submission version Policy Reference: Not included in a separate policy

- As per the approach to windfall housing, comments to the Regulation 14 version of the Policy noted that the timeframe established in respect of submitting proposals is inappropriate.
- Wider clauses in the policy in the Regulation 14 version of TNP2 related to spatial criteria and design principles. These have been amalgamated into the

policy in TNP2 setting out design principles for employment uses (Policy CPQ2). This does not result in a significant effect.

4. Summary

TNP2 was 'screened in' for the purposes of SEA. An Environmental Report was prepared and consulted upon alongside the Regulation 14 version of TNP2. The Environmental Report assessed a series of growth scenarios. The outcomes of this support the selection of the preferred growth option in TNP2. Comments received in response to the Regulation 14 consultation were considered and amendments made to TNP2 as appropriate. Planning Practice Guidance only requires modifications to be made to an Environmental Report after a Regulation 14 consultation where any proposed changes to the neighbourhood plan are substantial and give rise to significant effects that need to be assessed. This Addendum confirms that the changes made to the TNP2 following the Regulation 14 consultation have led to a reduction in certain environmental impacts. Furthermore, none of the changes could be considered substantial when compared against the Plan's objectives, nor to have resulted in significant effects. Finally, as discussed in Section 3.1 above, there has been a recent overall reduction in the identified housing requirement for Thame. The reasonable alternatives, or potential variations of them, would now result in a scale of growth alongside associated impacts that would now be considered unreasonable.

