



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

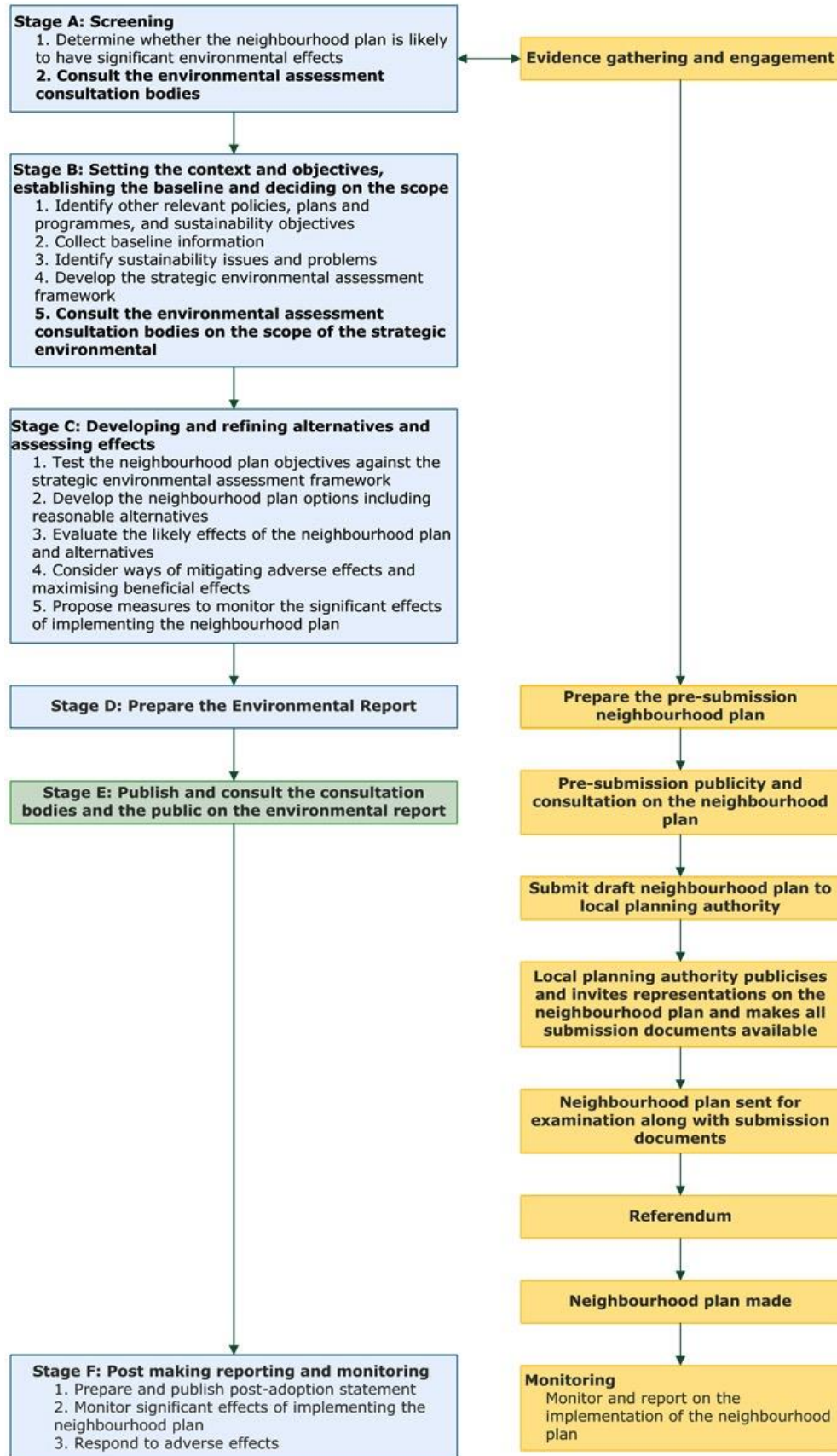


Figure 1: Neighbourhood Plan SEA process flowchart. Source: Planning Practice Guidance, [Paragraph: 033](#)
Reference ID: 11-033-20150209

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.

