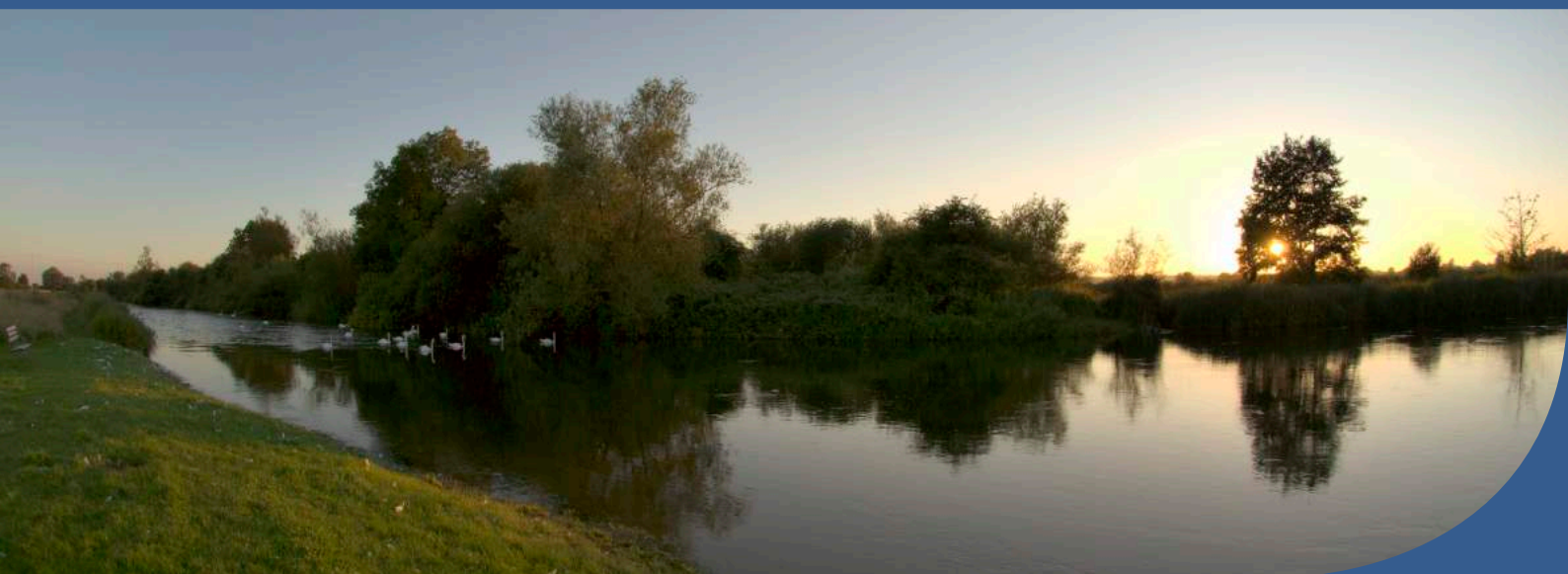


Strategic Environmental Assessment and Habitats Regulations Assessment of the Clifford Chambers & Milcote Neighbourhood Plan

SEA and HRA Screening Document

February 2019



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SEA and HRA Screening Document

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Acronyms

ALC	Agricultural Land Class
BUAB	Built-Up Area Boundary
EIA	Environmental Impact Assessment
EU	European Union
GP	General Practice
HRA	Habitats Regulations Assessment
IROPI	Imperative Reasons of Overriding Interest
IRZ	Impact Risk Zone
LCA	Landscape Character Assessment
NHS	National Health Service
NP	Neighbourhood Plan
NPPF	National Planning Policy Framework
ODPM	Office of the Deputy Prime Minister
PP	Policy or Programme
PPG	Planning Policy Guidance
PRoW	Public Right of Way
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SPA	Special Protection Area
SSSI	Site of Special Scientific Interest

1 Introduction

1.1 This report

1.1.1 This screening report has been prepared to determine whether the Clifford Chambers and Milcote Neighbourhood Plan 2011 - 2031 (NP) should be subject to a Strategic Environmental Assessment (SEA), in accordance with the European Directive 2001/42/EC¹ (SEA Directive) and the Environmental Assessment of Plans and Programmes Regulations 2004² (SEA Regulations).

1.1.2 This report screens the November 2018 Pre-Submission Consultation of the Clifford Chambers and Milcote Neighbourhood Plan 2011 - 2031³.

1.2 Strategic Environmental Assessment

1.2.1 The basis for Strategic Environmental Assessment legislation is European Directive 2001/42/EC. This was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Detailed guidance of these regulations can be found in the Government publication 'A Practical Guide to the Strategic Environmental Assessment Directive'⁴ and Paragraph 009 of the Planning Practice Guidance (PPG) 'Neighbourhood Planning' section⁵.

¹ Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=en> [Date Accessed: 19/12/18]

² Available at: <http://www.legislation.gov.uk/ukxi/2004/1633/contents/made> [Date Accessed: 19/12/18]

³ Clifford Chambers and Milcote Council (2018) Clifford Chambers and Milcote Neighbourhood Plan 2011-2031, pre-Submission Consultation November 2018. Available at: http://www.ccandm.org/Clifford%20Chambers%20&%20Milcote%20Neighbourhood%20Plan_Pre%20Submission%20Consultation%20November%2018_Published%20Version.pdf [Date Accessed: 13/12/18]

⁴ Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf [Date Accessed: 19/12/18]

⁵ Available at: <https://www.gov.uk/guidance/neighbourhood-planning--2> [Date Accessed: 19/12/18]

1.2.2 Under the requirements of the European Directive 2001/42/EC and Environmental Assessment of Plans and Programmes Regulations 2004, certain types of plans that set the framework for the consent of future development projects must be subject to an environmental assessment.

1.3 The Clifford Chambers and Milcote Neighbourhood Plan

1.3.1 The creation of neighbourhood development plans started with the Government's Localism Act 2011. The Act set out a series of measures to shift power away from central government and towards local people. One of the Localism Act's key components is the Neighbourhood Plan (NP); a new tier in planning policy which enables local people to shape the development of the community in which they live.

1.3.2 On 7th October 2015, Stratford-on-Avon District Council formally approved the boundary of the designated neighbourhood area of Clifford Chambers and Milcote (see **Figure 1.1**). Stratford-on-Avon District Council also gave approval for Clifford Chambers and Milcote Parish Council to set up a Neighbourhood Plan Steering Group to develop a NP.

1.3.3 The NP offers a picture of the Parish and a vision for the 20 year period between 2011 and 2031. The NP's core aim is to ensure that all development is sustainable and accords with the preferences of the local community.

1.3.4 The Clifford Chambers and Milcote NP has been developed on behalf of the Parish Council by volunteers within the Neighbourhood Plan Steering Group. Evidence gathering and analysis between 2016 and 2018, including a number of surveys and questionnaires to residents and liaisons with residents and local businesses, have led to the creation of policies and the existing documentation.

1.3.5 The Plan must also have appropriate regard to existing policy, including:

- The National Planning Policy Framework⁶ and related Planning Practice Guidance advice⁷; and
- Policies within the Stratford-on-Avon District Core Strategy⁸.

1.3.6 A summary of the NP's policies are listed in **Appendix A**. These are associated with the NP's strategic objectives as follows:

- Housing;
- Natural Environment;
- Local Community; and
- Traffic and Transport.

Consultation

1.3.7 The NP is subject to public consultation, which provides an opportunity for the public and local organisations to comment on the NP. After consultation, responses are taken into account and used to prepare a 'submission draft' of the NP.

1.3.8 The submission version of the NP is then subject to inspection by the Independent Examiner. If the Independent Examiner approves the NP it will then be subject to a local referendum. If 50% or more of people voting in the referendum support the NP, then the NP will be adopted, will gain statutory status and will become integral to the Stratford-on-Avon District Council Local Plan.

⁶ Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf [Date Accessed: 20/12/18]

⁷ Available at: <https://www.gov.uk/government/collections/planning-practice-guidance> [Date Accessed: 20/12/18]

⁸ Stratford District Council (2016) Stratford-on-Avon Core Strategy 2011 to 2031. Available at: <https://www.stratford.gov.uk/planning-regeneration/core-strategy.cfm> [Date Accessed: 11/12/18]



Figure 1.1: Clifford Chambers and Milcote Parish Boundary (source: NP)

1.4 The Parish of Clifford Chambers and Milcote

- 1.4.1 Clifford Chambers and Milcote is situated in the Stratford-on-Avon District of Warwickshire, and comprises 946ha of rural landscape. The Parish is located approximately 3km south of Stratford-upon-Avon, and 28km north west of Banbury.
- 1.4.2 The majority of the settlement area is situated in the valley of the River Stour, which runs adjacent to the eastern Parish boundary, until it meets the River Avon at the northern Parish boundary.
- 1.4.3 The population of Clifford Chambers and Milcote is approximately 430. Residents of the Parish benefit from the green and rural surroundings as well as views of both the built and natural heritage, including cherished landmarks.
- 1.4.4 Notable features of the Parish include views of the River Stour and St Helen's Church clocktower, as well as the diverse local wildlife and the historic heritage of the village setting.
- 1.4.5 Services available within the Parish include a public house, nursery school, and a garden centre with a café. The Village Hall and adjacent Social Club provide opportunities for social engagements and community activities. In addition, the Recreation Ground offers facilities for local sports clubs.

1.5 Relationship with the Core Strategy

- 1.5.1 The NP is a land-use plan, prepared for town and country planning purposes. It sets out a framework for future development consents within the Clifford Chambers and Milcote Parish. As noted above, once adopted, the NP will form part of the Development Plan for the District, alongside the Core Strategy and other development plan documents and supplementary planning documents.
- 1.5.2 The NP sets out a series of policies that, once made, will be used to guide development and help to determine future planning applications. This important legal position means that it has to regard national planning policy and to be in 'general conformity' with the strategic planning policies set out in the Stratford-on-Avon District Core Strategy 2011-2031.

1.5.3 NPs are smaller in geographic scale than Core Strategies and Local Plans and serve to add further detailed policies and proposals to these documents. The Clifford Chambers and Milcote NP and the Stratford-on-Avon District Core Strategy will form part of the development plan for the area once the NP is 'made'.

1.5.4 The Revised NPPF⁹ states that *“Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies”*.

1.6 Assumptions

1.6.1 For the purposes of this screening assessment a number of assumptions have been made as follows.

1.6.2 The NP does not allocate any land for residential development. However the NP provides a 'reserve site' for *“approximately 15 homes”*, which may be released to meet future housing needs.

1.6.3 Should the NP be further developed in the future, a re-screening of any amendments will need to be undertaken for the purposes of the SEA and HRA screening processes.

⁹ Available at:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf

2 The Screening Process

2.1 Strategic Environmental Assessment screening

2.1.1 SEA seeks to ensure that environmental considerations are part of the process of preparing certain plans and programmes. The objective of the Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes, with a view to promoting sustainable development. It helps to ensure that, in accordance with the Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment.

2.1.2 The process for determining whether or not an SEA is required is called screening. In order to screen, it is necessary to determine if a plan will have significant environmental effects using the criteria set out in Annex II of the SEA Directive and Schedule I of the SEA Regulations. A determination cannot be made until the three statutory consultation bodies have been consulted: the Environment Agency, Natural England and Historic England.

2.1.3 Within 28 days of its determination, the local planning authority, by virtue of its legal responsibility for NPs, must publish a statement, setting out its decision. If they determine that an SEA is not required, the statement must include the reasons for this.

2.2 The screening process

2.2.1 The Localism Act requires NPs to be in general conformity with the strategic policies of the adopted development plan for the local area. In this instance, the NP must be in general conformity with the Stratford-on-Avon District Core Strategy 2011-2031.

2.2.2 Paragraph 009 of the Planning Practice Guidance (PPG) 'Neighbourhood Planning' section states:

"Where a neighbourhood plan is brought forward before an up-to-date Local Plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in:

- the emerging neighbourhood plan
- the emerging Local Plan
- the adopted development plan

with appropriate regard to national policy and guidance”.

2.2.3 **Figure 2.1** presents a diagram prepared by the ODPM (2005). This shows the application of the SEA process to plans and programmes. The sequential approach in the flow diagram can be used to screen the Clifford Chambers and Milcote NP.

2.2.4 **Table 2.1** uses the questions presented in **Figure 2.1** to establish whether there is a need for SEA for the Clifford Chambers and Milcote NP.

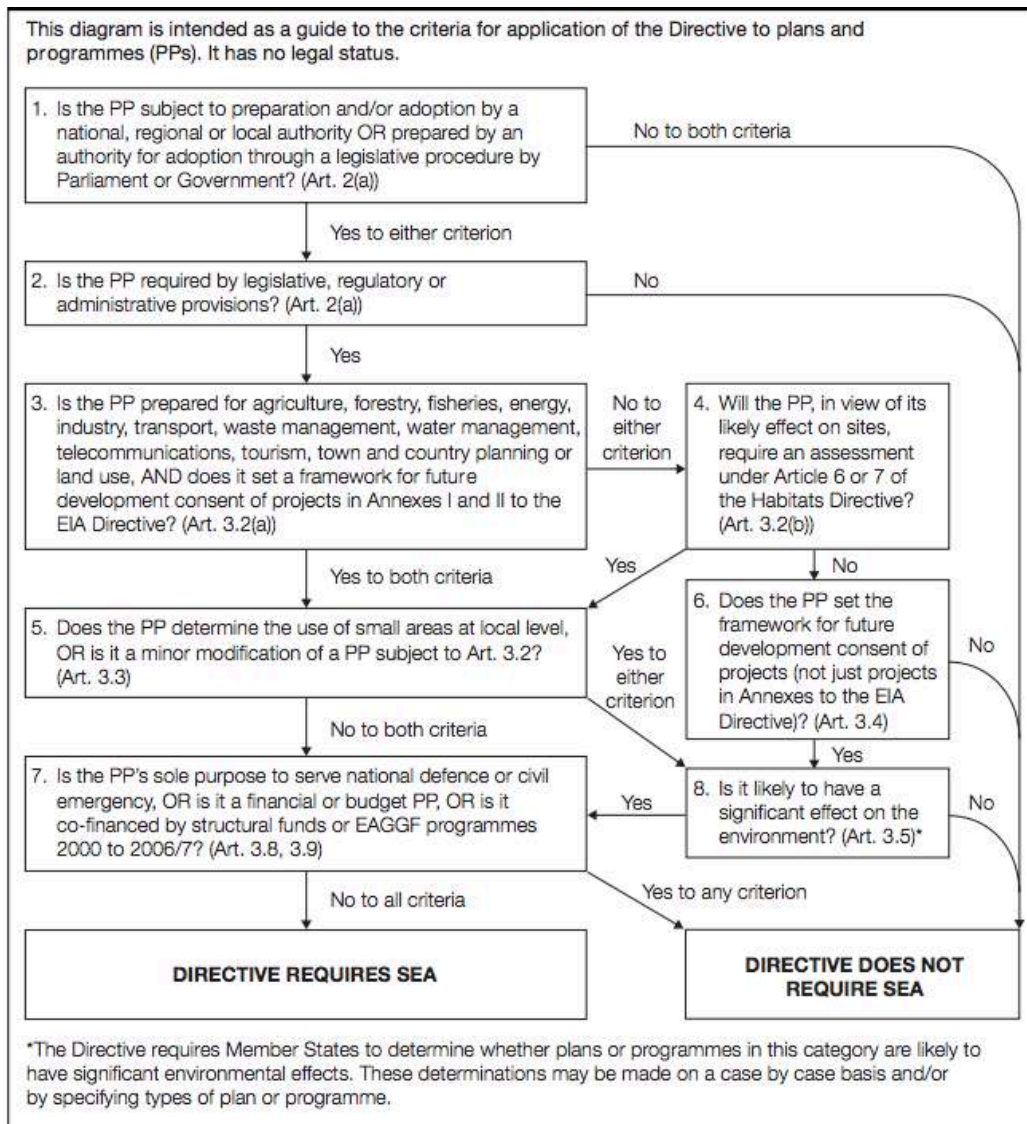


Figure 2.1: Application of the SEA Directive to plans and programmes¹⁰.

¹⁰ODPM (2005) A Practical Guide to the Strategic Environmental Assessment Directive

Table 2.1: Establishing whether there is a need for SEA.

Stage	Y/N	Reason
Is the PP (plan or programme) subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	Yes	The plan constitutes an NP, which will be subject to independent examination and brought into legal force if it receives 50% or more affirmative votes at referendum. The NP would form part of the statutory development plan for Stratford-on-Avon District.
Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))	No	Communities and neighbourhoods have a right to produce an NP, however it is not required by legislative, regulatory or administrative bodies. If the NP is adopted it would become part of the statutory development plan, meaning it should continue to be screened under the SEA Directive.
Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))	No	The NP is a land-use plan and sets the framework for future development consents within the Clifford Chambers and Milcote Neighbourhood Area. However, the NP is unlikely to set a framework for consent of projects in Annex 1 of the EIA Directive.
Will the PP, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))	No	See Chapter 3
Does the PP set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)? (Art 3.4)	Yes	The NP does set the framework for future development consent of projects.
Is it likely to have a significant effect on the environment? (Art. 3.5)	No	See Section 2.5 - 2.12 and Chapter 4
Is the PP's sole purpose to serve national defence or civil emergency, OR is it a financial budget PP, OR is it co-financed by structural funds or EAGGD programmes 2000 to 2006/7? (Art 3.8, 3.9)	No	Not applicable.

2.3 Relevance to the SEA Directive

2.3.1 Question 8 within the ODPM guidance (see **Figure 2.1**) refers to whether the NP would have a significant effect on the environment. The criteria from Annex II of the SEA Directive and Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004 can be used to consider the relevance of the Plan to the SEA Directive. **Sections 2.5 – 2.12** consider the likely environmental effects of the plan.

Table 2.2: Clifford Chambers and Milcote NP and the SEA Directive

Criteria (from Annex II of SEA Directive and Schedule I of Regulations)	Response
The characteristics of plans and programmes	
(a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources	The NP is prepared for town and country planning and will form a part of the development management framework for Clifford Chambers and Milcote Parish.
(b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy	The NP must be in general conformity with the strategic planning policies set out in the Stratford-on-Avon District Core Strategy 2011 – 2031 and the National Planning Policy Framework. The NP forms part of the statutory development plan for Stratford-on-Avon District.
(c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development	There are opportunities to integrate environmental considerations within the Clifford Chambers and Milcote NP. The NP contains policies that aim to protect environmental features, such as valued landscapes, open green spaces, and heritage assets (see Appendix A).
(d) environmental problems relevant to the plan or programme	No environmental issues were identified relevant to the plan.
(e) the relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection)	The NP is a land use plan and sets the framework for future development consents within the Clifford Chambers and Milcote NP area. It also sets out policies which planning applications within the NP area will need to adhere to.

Characteristics of the effects and of the area likely to be affected	
(a) the probability, duration, frequency and reversibility of the effects	The NP is not expected to result in any significant environmental effects.
(b) the cumulative nature of the effects	The NP is not considered to have any cumulative effects and is not thought to contribute to cumulative impacts in combination with the Stratford-on-Avon District Core Strategy.
(c) the transboundary nature of the effects	The NP is not expected to give rise to any significant transboundary environmental effects.
(d) the risks to human health or the environment (for example, due to accidents)	There are no anticipated risks of the NP on human health.
(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	The NP is unlikely to result in any significant adverse environmental effects. It is likely that some policies will help preserve and enhance environmental features within the Neighbourhood Area.
(f) the value and vulnerability of the area likely to be affected due to: <ul style="list-style-type: none"> (i) special natural characteristics or cultural heritage (ii) exceeded environmental quality standards or limit values (iii) intensive land-use 	It is considered to be unlikely that the NP would adversely impact the special natural characteristics or cultural heritage features within the Neighbourhood Area. The NP would not be expected to cause exceedances of environmental standards or lead to intensive land use.
(g) the effects on areas or landscapes which have a recognised national, Community or international protection status	The NP is unlikely to result in any adverse impacts on protected landscapes.

2.4 Determination of likely significant effects

2.4.1 A summary of baseline conditions and an assessment of the potential effects of the NP against each of the topics set out in Annex I (f) of the SEA Directive is presented in the following sections. The NP policies are set out in **Appendix A**.

2.5 Biodiversity, flora and fauna

- 2.5.1 There are no designated biodiversity sites located within Clifford Chambers and Milcote Parish. However, there are two Sites of Special Scientific Interest (SSSIs) located less than 1km from the Parish boundary; 'Racecourse Meadow' to the north, and 'Ailstone Old Gravel Pit' to the south east.
- 2.5.2 'Policy H1' states that new housing developments must be located within the village Built-up Area Boundary (BUAB) (**Figure 2.2**). Furthermore, 'Policy H2' states that affordable housing developments will only be considered outside the BUAB if there is sufficient evidence that "*no other suitable and available sites exist within the Village Boundary*". Despite this, a reserve site has been allocated outside of the BUAB. Although the BUAB and adjacent land, including this site, is located within an IRZ (Impact Risk Zone) of 'Racecourse Meadow' SSSI (see **Figure 2.3**), there are no risks identified specifically with residential developments. It is understood that the only potential future development identified in the NP is residential in nature, therefore there is no current reason to expect any negative impact on this SSSI.
- 2.5.3 NP 'Policy NE3' states that development must not adversely affect "*woodland and copses, mature trees and hedgerows, and protected, rare, endangered or priority species*" or wildlife corridors such as watercourses. Where trees and hedgerows cannot be retained, "*replacement trees or hedgerows of an equivalent or better standard will be required*". This Policy should help to ensure that future development does not result in loss or damage to wildlife species or their habitats.
- 2.5.4 Overall, it is anticipated the NP will help protect biodiversity, flora and fauna in the Neighbourhood Area. A significant adverse impact is not considered to be likely.

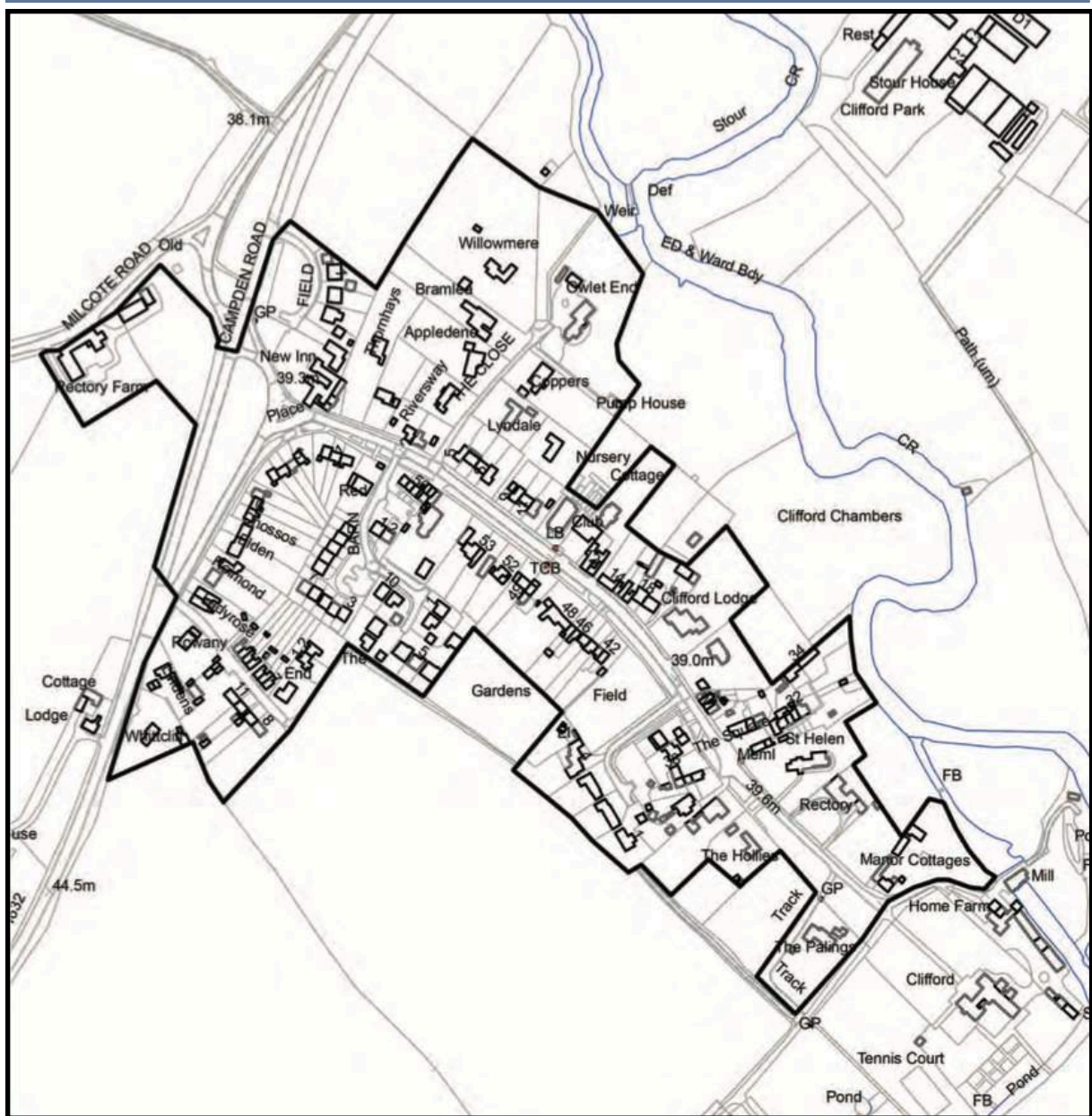


Figure 2.2: Clifford Chambers and Milcote Village Built-Up Area Boundary (source: NP)

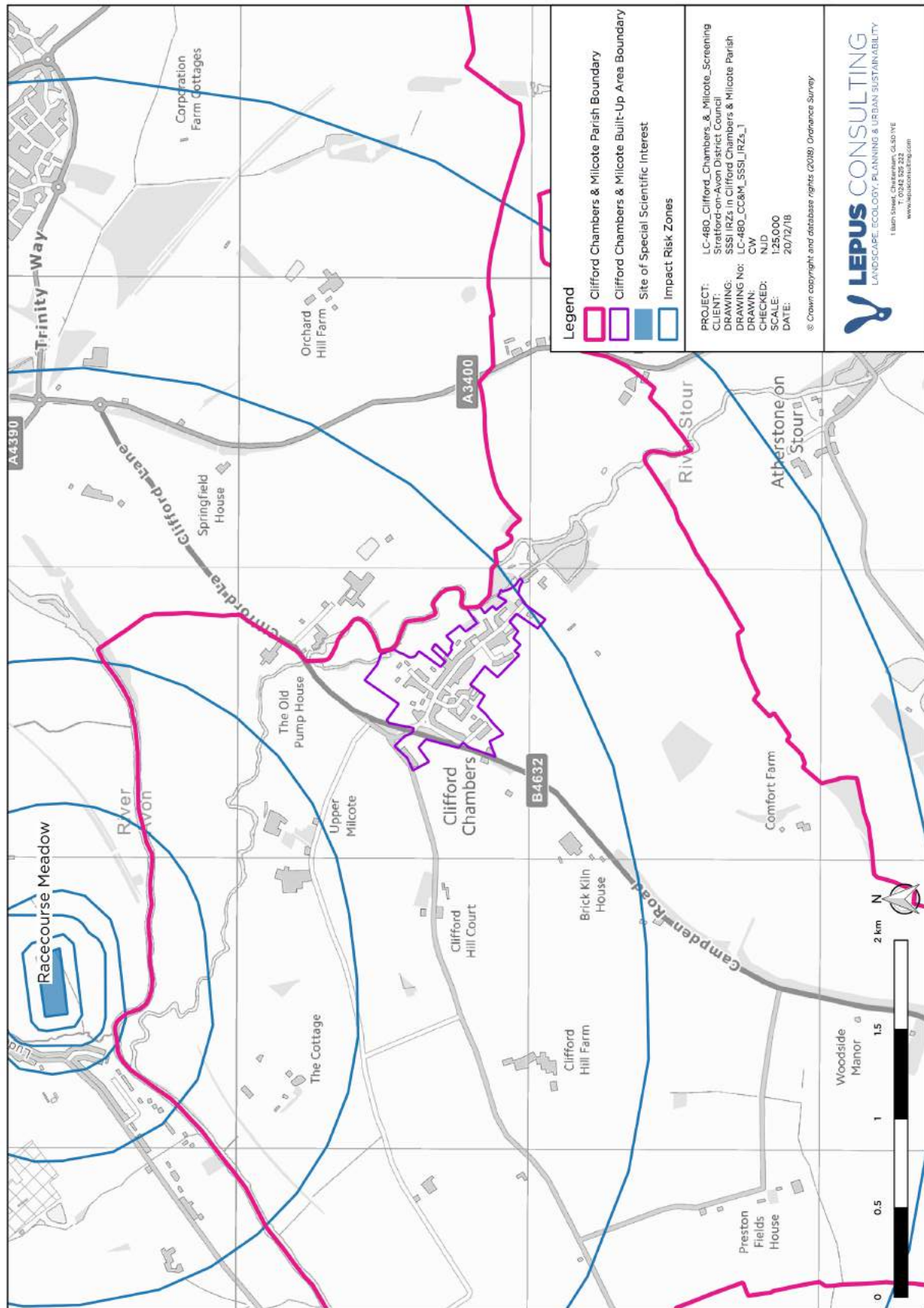


Figure 2.3: The 'Racecourse Meadow' SSSI and associated IRZs in Clifford Chambers and Milcote Parish (source: Natural England).

2.6 Population and human health

- 2.6.1 There are no health facilities located within Clifford Chambers and Milcote. The nearest GP surgeries and NHS Hospital are found in Stratford-upon-Avon, located approximately 3km north of the Parish.
- 2.6.2 As mentioned in **section 1.4**, the facilities located within Clifford Chambers and Milcote are fairly limited. The NP refers to “*maintaining existing greenspaces and recreational facilities*” and future developments being “*with direct access to Village facilities*” as part of the Steering Group’s vision for the Parish. Therefore, the addition of a policy with the aim of retaining or improving these facilities is suggested, to help ensure current and future residents of the Parish have access to these community services, in conformity with this vision.
- 2.6.3 Due to the rural location of the Parish, residents have excellent access to a diverse range of natural habitats and open spaces. In addition, the NP designates five areas of Local Green Space within the Parish, all of which are located either within or adjacent to the BUAB. ‘Policy LC2’ states that any future development which could “*harm the openness or special character of a Local Green Space*” would not be supported. This Policy should help to ensure that any future housing developments within the NP do not negatively impact the open spaces available for residents.
- 2.6.4 The Parish is heavily car-dependent and many households own multiple vehicles. ‘Policy TT1’ aims to help combat local congestion issues by ensuring future housing developments provide sufficient off-road parking. Furthermore, ‘Policy TT3’ states that “*new development should not result in inappropriate traffic generation or have an unacceptable adverse impact on road safety*” and not exacerbate transport related emissions associated with congestion. These policies should help to reduce negative impacts to human health associated with these emissions.
- 2.6.5 ‘Policy H3’ indicates that development proposals for ‘live-work’ units will be supported, allowing “*residential and work uses to operate together*”. Therefore this may help to provide local employment opportunities for residents.

2.6.6 The NP identifies a reserve site, located outside the BUAB, for the development of “approximately 15 homes” if the need arises in the future. The development at the ‘reserve’ site, or any other location within the BUAB, would not be expected to have a significant impact on local population and health at this stage of assessment.

2.7 Transport and accessibility

2.7.1 Whilst not an Annex 1(f) topic in itself, transport and accessibility interacts with a number of the topics such as population and human health, material assets and climatic factors.

2.7.2 The BUAB contains numerous pavements and public footpaths allowing pedestrian access to the village facilities, therefore any new development within this area should expect to be located with good pedestrian accessibility. Furthermore, ‘Policy TT2’ states that any new developments should “*demonstrate how walking and cycling opportunities have been prioritised and connection made to existing routes*”. ‘Policy H3’ notes that new ‘live-work’ units will be supported if they have access to “*service facilities by means other than a private vehicle*”. These policies should help to ensure that these sustainable transport options are available to potential future residents.

2.7.3 Within the Parish there are two bus stops providing limited services. The closest railway station is in Stratford-upon-Avon, located approximately 3km north of the Parish.

2.7.4 Since there are no Primary or Secondary Schools located within the Parish, children must travel into nearby Stratford-upon-Avon for these educational facilities, which is accessible by bus.

2.7.5 ‘Policy TT1’ and ‘Policy TT3’ regarding traffic, mentioned in **section 2.6**, should together help to ensure continued safe pedestrian and cycle access to facilities within and nearby the Parish.

2.7.6 Overall it is considered unlikely that there will be any significant negative impact on transport and accessibility within the Parish as a result of the NP.

2.8 Soil, water and air

- 2.8.1 Undeveloped land within the BUAB, and the reserve site, cover predominantly Agricultural Land Class (ALC) Grade 4 land. Any future development at these locations would therefore not be expected to result in a loss of agriculturally important soil.
- 2.8.2 The main road that feeds into the Parish is the B4632. 'Policy TT3' states that development proposals that "*generate significant amounts of [traffic] movement (e.g. >10 dwellings) must be supported by a Transport Statement or Transport Assessment which details satisfactory mitigation plans*". As the reserve site has the potential for up to 15 homes, this policy should help to ensure that if this site is developed in the future, impacts on traffic flows will be mitigated. Although there are no recorded air quality issues identified in the NP, it is recommended that this policy could be expanded to include the impact that traffic associated with developments may have on air pollution and emissions, in order to help ensure the safeguarding of the Parish's air quality for the future.
- 2.8.3 The north eastern edge of the village of Clifford Chambers is situated on a natural floodplain of the River Stour, and is within Flood Zones 2 and 3 (**Figure 2.4**). There are significant areas within the village also at risk of pluvial flooding (**Figure 2.5**). The reserve site is not situated on land at risk of either fluvial or pluvial flooding.
- 2.8.4 'Policy NE1' states that development "*should not increase flood risk*" and that land proposed for development must not be at "*significant risk of flooding based on historical data*". This Policy also encourages the use of "*sustainable urban drainage systems and permeable surfaces*" in new developments. 'Policy CS.4' in the Stratford-on-Avon District Core Strategy states that the "*flood plain will be maintained*". In conformity with this, areas of the BUAB in Flood Zone 2 or 3 should be considered inappropriate for future development. 'Policy H4' in the NP indicates that support will only be given for developments in garden land that "*do not exacerbate the risk of flooding*". These policies should help to ensure any future developments address the risk of fluvial and pluvial flooding by helping to control surface water run-off, and not supporting developments that exacerbate flood risk.
- 2.8.5 At this stage of assessment, it is considered unlikely that there would be any significant adverse impacts on soil, air or water resources of the Parish as a result of the NP.

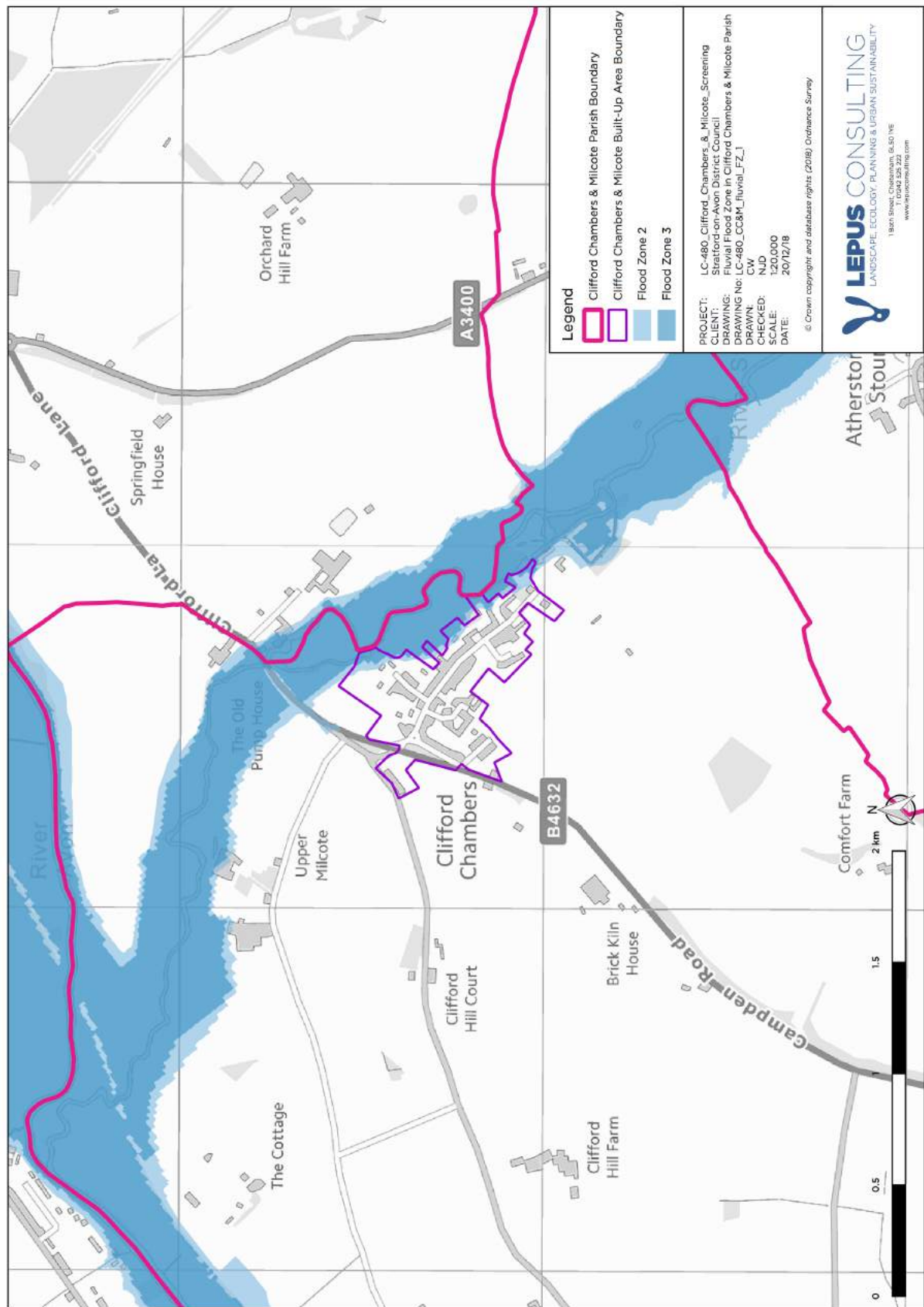


Figure 2.4: The extent of Flood Zones 2 and 3 within Clifford Chambers and Milcote Parish (source: Environment Agency).

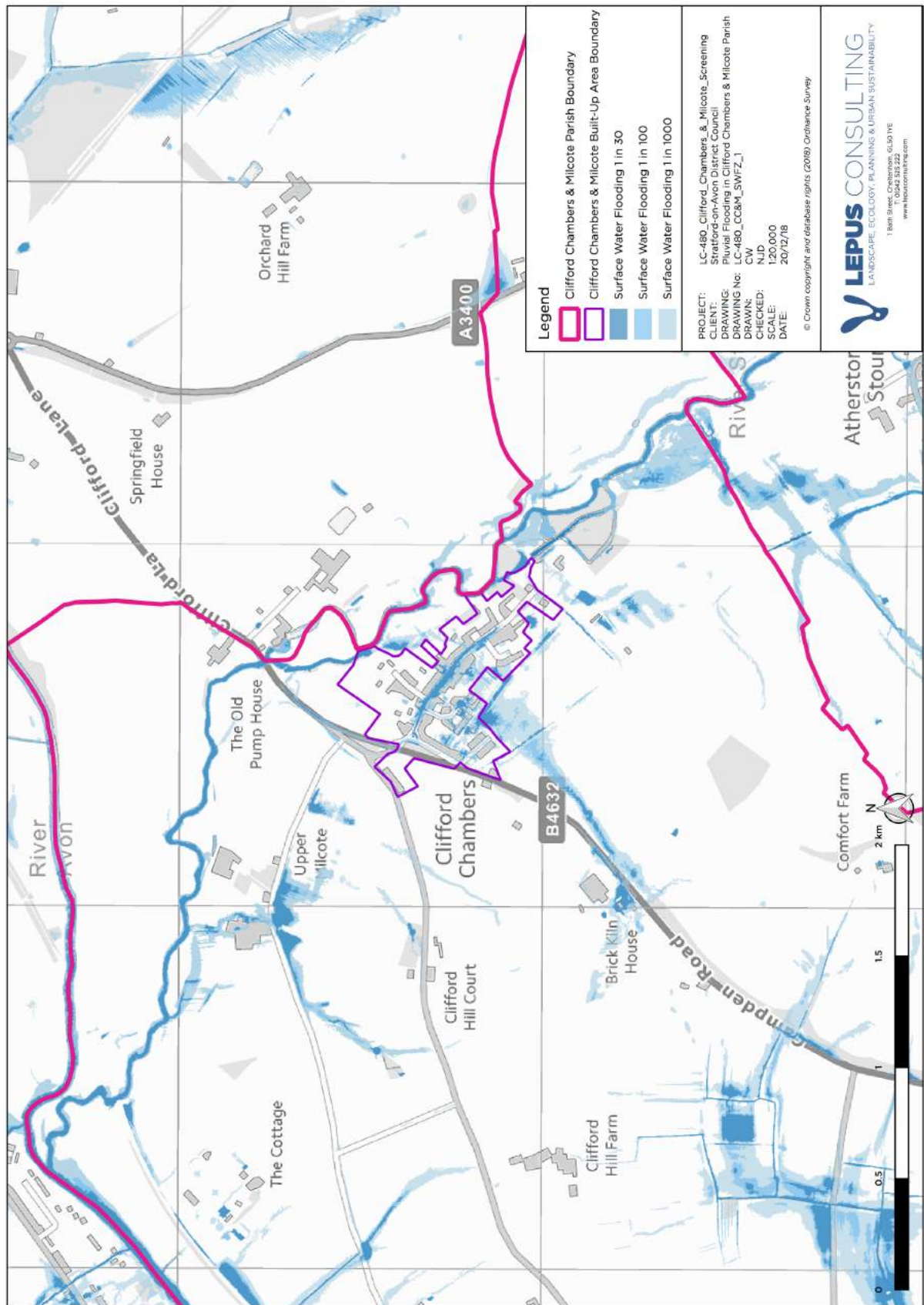


Figure 2.5: The risk of surface water flooding extent within Clifford Chambers and Milcote Parish (source: Environment Agency).

2.9 Climatic factors

- 2.9.1 In conformity with the Core Strategy 'Policy CS.2', development proposals must demonstrate climate change mitigation and adaptation measures, including designs that reduce carbon emissions and promote renewable energy schemes.
- 2.9.2 'Policy CS.3' in the Core Strategy states that "*small-scale community led initiatives for renewable and low carbon energy will be encouraged by the Council*". It is suggested that this is something the Clifford Chambers and Milcote Parish Council consider including in the NP, to help ensure reduction of greenhouse gas emissions and minimise the Parish's effect on climate change, in light of any future development.
- 2.9.3 Clifford Chambers and Milcote is fairly limited in terms of sustainable transport options, and as such residents are reliant on car travel for access to many services, facilities, and employment (see **section 2.7**).
- 2.9.4 Despite this, at this stage of assessment, a negligible impact on climate change is expected.

2.10 Material assets

- 2.10.1 The material assets topic considers social, physical and environmental infrastructure. This sub-section should be read alongside 'Population and human health', which details health and social infrastructure implications of the NP; 'Climatic factors', which considers transport infrastructure in terms of sustainable transport; 'Soil, water and air', which considers water infrastructure and agricultural land classification; and the 'Biodiversity, flora and fauna' sub-section, which considers environmental infrastructure.
- 2.10.2 'Policy LC4' in the NP states that any new development must allow connectivity to high speed internet and broadband. This may provide benefits for residents choosing to work from home, as well as local businesses.

- 2.10.3 One 'theme' of the NP's Vision is to ensure new developments have sufficient access to the existing village facilities, such as the Jubilee Hall and Social Club. As such, it is expected that any future developments will be able to make use of this community infrastructure. This would include green infrastructure such as recreation grounds and green open spaces, as designated in 'Policy LC2'.
- 2.10.4 It is considered unlikely that the NP would have significant adverse impacts on material assets within the Neighbourhood Area.

2.11 Cultural heritage

- 2.11.1 There are 27 Listed Buildings located within the Parish, three of which are Grade II* Listed and 24 Grade II Listed. The majority of these Listed Buildings are located within the Clifford Chambers Conservation Area (see **Figure 2.6**), which is encompassed by the BUAB. There is also a Registered Park and Garden, 'Clifford Manor', located within the Parish adjacent to the BUAB.
- 2.11.2 'Policy LC1' states that "*development within and adjacent to all heritage assets will be strictly controlled*". Damage to or loss of any heritage asset will only be supported in exceptional circumstances, if "*necessary to achieve substantial public benefits that outweigh the harm or loss*". This Policy should help to ensure that the Conservation Area and the Registered Park and Garden retain their character and the setting of these historic assets in light of any development in future.
- 2.11.3 'Policy LC3' details criteria that any new developments should adhere to in order to retain the traditional character of the Parish. This includes specific building materials, inclusion of open space between buildings to retain views, and discouragement of the use of solar panels in close proximity to any Listed Buildings. As a result of this Policy, in combination with Core Strategy 'Policy CS.8' which emphasises the protection of the District's historic environment, it is considered unlikely that future development would adversely impact the setting of these Listed Buildings.

2.11.4 The reserve site is not located adjacent to a heritage asset. Future development here would therefore not be expected to result in a significant adverse impact on cultural heritage assets within the Parish. Potential future development within the BUAB must be mindful of the impact that housing located within or in close proximity to the Conservation Area may have on its setting and character.

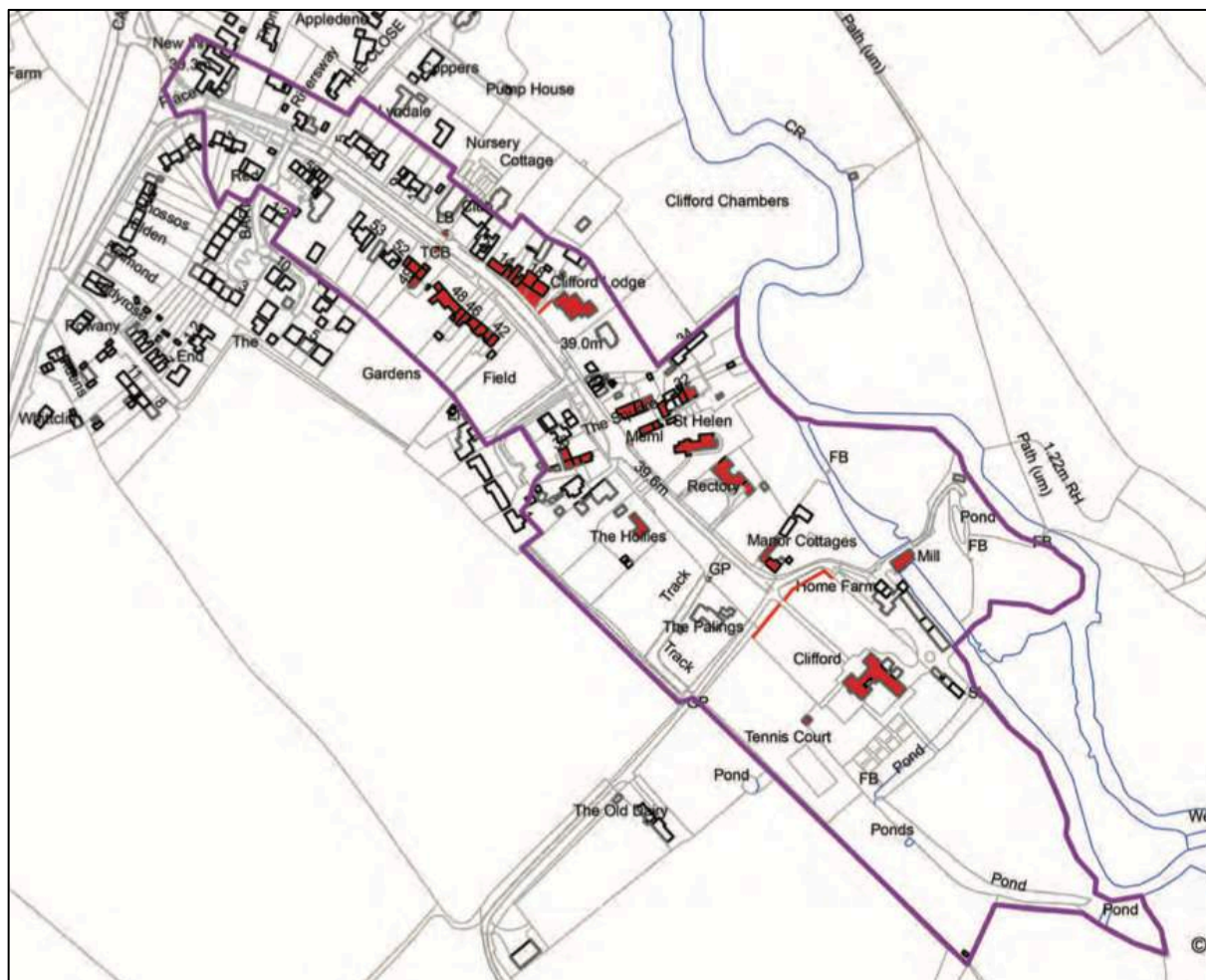


Figure 2.6: Clifford Chambers Conservation Area and Listed Buildings (source: NP)

2.12 Landscape

- 2.12.1 A Landscape Sensitivity study¹¹ has determined the sensitivity of land to housing development around Clifford Chambers village (see **Figure 2.7**). The north eastern edge of the BUAB adjacent to the floodplain is located within an area of 'high' sensitivity. According to the study, this area (classified as 'CI04' in **Figure 2.7**) is "*highly inappropriate*" for housing development. A further area (CI02) encompassing the most north western section of the BUAB is also considered "*inappropriate*" for housing. The reserve site is located within an area of 'high/medium' sensitivity (CI01), and as such "*small scale housing development*" here could be considered suitable. This study should be considered when locations are determined for any future development.
- 2.12.2 A detailed character assessment has been undertaken during the preparation of the NP, determining key characteristics and important features of the neighbourhood area. 'Policy NE2' states that any new development must "*have regard to the landscape character and protect valued skylines and landscapes*". 'Policy H4' notes that development on garden land will only be permitted if it would "*preserve or enhance the character of the area*". Additionally, as mentioned in **section 2.11**, 'Policy LC3' aims to preserve the neighbourhood area character. These policies should help to ensure that any future developments will be in keeping with the current character and openness of the Parish, and not alter these views.
- 2.12.3 As expected for a rural Parish, residents of Clifford Chambers and Milcote have good access to the surrounding open countryside. There is an extensive Public Right of Way (PRoW) network, as well as footpaths and bridleways linking the Parish to nearby settlements. 'Policy TT2', as mentioned in **section 2.7**, should help to ensure that no footpaths will be lost or views impacted, should any future developments be proposed.
- 2.12.4 Due to the lack of any site allocations in the NP, and taking into consideration those policies noted above, a significant impact on the local landscape can be objectively ruled out at this stage.

¹¹ White Consultants (2012) Stratford-on-Avon District. Landscape Sensitivity Assessment for Villages (Volume 1). Available at: <https://democracy.stratford.gov.uk/documents/s18889/Vol%201%20Stratford%20villages%20landscape%20sensitivity%20reduced%2029061.pdf> [Date Accessed: 18/12/18]

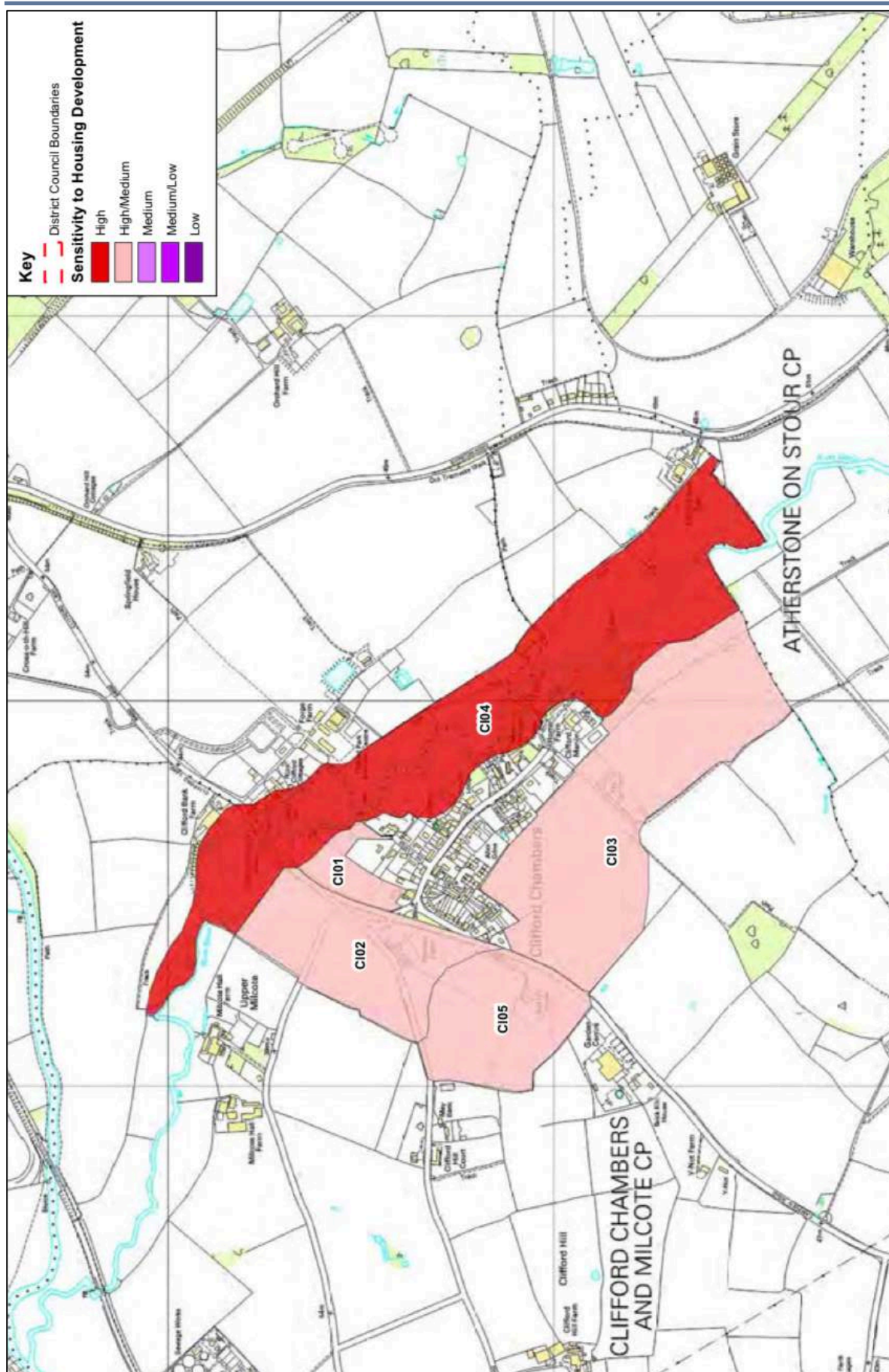


Figure 2.7: Clifford Chambers and Milcote landscape sensitivity to housing development (source: White Consultants)

3 HRA Screening Process

3.1 Habitats Regulations Assessment screening

3.1.1 HRA screening is a requirement of Regulation 105 of the Conservation of Habitats and Species Regulations 2017¹².

3.1.2 HRA considers the potential adverse impacts of plans and projects on designated Special Areas of Conservation (SACs), classified Special Protection Areas (SPAs) and listed Ramsar sites. This is in accordance with the Habitats Directive¹³ and the Birds Directive¹⁴. SACs, SPAs and Ramsar sites are collectively known as the Natura 2000 network.

3.1.3 Should a development, plan or project be considered likely to have a significant impact on a Natura 2000 site, the HRA proceeds to an Appropriate Assessment. If likely significant effects cannot be avoided, mitigated or compensated to the extent that the conservation status of the EU site will not be undermined, the HRA proceeds to Imperative Reasons of Overriding Interest (IROPI).

3.2 Determination of likely significant effects

3.2.1 The nearest Natura 2000 site to Clifford Chambers and Milcote Parish is 'Bredon Hill' SAC, which is located approximately 34km to the south west. Due to this distance and the nature of the policies contained within the NP, there is unlikely to be any impact on this SAC. Based on the available information, a significant impact of the NP on any Natura 2000 site can therefore objectively be ruled out at this stage.

¹² Conservation of Habitats and Species Regulations 2017. Available at: <http://www.legislation.gov.uk/uksi/2017/1012/regulation/105/made> [Date Accessed: 19/12/18]

¹³ EU Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora

¹⁴ EU Council Directive 2009/147/EC on the Conservation of wild birds

4 Conclusions

4.1 SEA Screening outcome

4.1.1 This screening report has explored the potential effects of the proposed Clifford Chambers and Milcote NP with a view to determining whether an environmental assessment is required under the SEA Directive.

4.1.2 In accordance with topics cited in Annex 1(f) of the SEA directive, significant effects on the environment are considered to be unlikely to occur as a result of the NP.

4.1.3 It is recommended that the Clifford Chambers and Milcote NP should **not** be screened into the SEA process.

4.2 HRA Screening outcome

4.2.1 This screening report has explored the potential effects of the proposed Clifford Chambers and Milcote NP with a view to determining whether a habitats regulations assessment is required.

4.2.2 It is recommended that the Clifford Chambers and Milcote NP should **not** be screened into the HRA process.

4.3 Consultation

4.3.1 This report has been subject to consultations with Natural England, Environment Agency and Historic England. Their comments are presented in **Appendix B**.

Appendix A: Clifford Chambers and Milcote NP Policies

Objective	Policy Number	Policy Name
Housing		
To disperse development evenly throughout the period of the NP	Housing Policy 1	Housing growth
To provide new housing as required by residents in various stages of their lives	Housing Policy 2	Local Housing Need
To encourage sustainable working patterns within the Neighbourhood Area	Housing Policy 3	Live Work Units
To ensure development within gardens of existing houses preserves or enhances the character of the area	Housing Policy 4	Use of Garden Land
Natural Environment		
Development should not increase flood risk.	Natural Environment Policy 1	Flood Risk and Surface Water Drainage
To protect important landmarks, skylines and valued landscapes	Natural Environment Policy 2	Protection of Valued Landscapes
To preserve and enhance habitats to ensure that wider biodiversity is protected.	Natural Environment Policy 3	Nature Conservation
To strongly moderate light pollution and retain "dark skies" by the sensitive provision of appropriate lighting as required	Natural Environment Policy 4	Maintaining the 'Dark Skies'
Local Community		
To ensure that the heritage buildings and structures are protected.	Local Community Policy 1	Designated Heritage Assets
To preserve existing Green Spaces	Local Community Policy 2	Designated Local Green Spaces
That any development serves to enhance the essential character of the Neighbourhood Area	Local Community Policy 3	Neighbourhood Area Character
Development of infrastructure to allow future connectivity to high speed broadband /internet	Local Community Policy 4	Promoting High Speed Broadband
Traffic and Transport		
To ensure the provision of safe off-road parking.	Traffic and Transport Policy 1	Parking
To maintain and enhance existing pedestrian and cycle routes	Traffic and Transport Policy 2	Walking and Cycling
To improve road safety at key access points and junctions	Traffic and Transport Policy 3	Highway Safety

Appendix B: Consultation Responses



Historic England

WEST MIDLANDS OFFICE

Ms Catherine Wright

Direct Dial: 0121 625 6887

Lepus Consulting Ltd.

1 Bath Street

Our ref: PL00528363

Cheltenham

GL50 1YE

10 January 2019

Dear Ms Wright

**BEAUDESERT AND HENLEY-IN-ARDEN; BEARLEY; NAPTON-ON-THE-HILL;
AND CLIFFORD CHAMBERS AND MILCOTE NEIGHBOURHOOD PLANS- SEA
AND HRA SCREENING**

Thank you for your consultation and the invitation to comment on the SEA and HRA Screening Document for the above Neighbourhood Plans.

For the purposes of consultations on SEA Screening Opinions, Historic England confines its advice to the question, "Is it likely to have a significant effect on the environment?" in respect of our area of concern, cultural heritage.

Our comments are based on the information supplied with the screening request. On the basis of the information supplied and in the context of the criteria set out in Schedule 1 of the Environmental Assessment Regulations [Annex II of the 'SEA' Directive], Historic England concurs with your view that the preparation of a Strategic Environmental Assessment is **not** required. Regarding HRA Historic England does not disagree with your conclusions but would defer to the opinions of the other statutory consultees.

The views of the other statutory consultation bodies should be taken into account before the overall decision on the need for a SEA is made. If a decision is made to undertake a SEA, please note that Historic England has published guidance on Sustainability Appraisal / Strategic Environmental Assessment and the Historic Environment that is relevant to both local and neighbourhood planning and available at: [<https://www.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>](https://www.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/)

I trust the above comments will be of help in taking forward the neighbourhood plan.



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TF

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Historic England

WEST MIDLANDS OFFICE

Yours sincerely,

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cc:



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Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

Hi Catherine

The Environment Agency can confirm that we concur with the findings of the Screening Report, and based upon the assertion that the NP does not contain any allocations we do not require a SEA to be undertaken in support of the plan.

Jane Field

Planning Specialist – Sustainable Places | West Midlands Area

Environment Agency | Sentinel House, 9 Wellington Crescent, Fradley Park, Lichfield, Staffordshire, WS13 8RR

Contact | Ext: 020 3025 3006 | Int: 53006 | www.gov.uk/environment-agency

Incident management standby role: Planning Cell Team Member



Creating a better place
for people and wildlife



Date: 12 February 2019
Our ref: 269046
Your ref: Clifford Chambers & Milcote Neighbourhood Development Plan



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BY EMAIL ONLY

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T 0300 060 3900

Dear Ms Wright

Clifford Chambers and Milcote's 'Neighbourhood Development Plan – Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA) Screening report

Thank you for your consultation request on the above dated and received by Natural England on 3rd January, 2019.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Screening Request: Strategic Environmental Assessment

It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests are concerned (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan.

Neighbourhood Plan

Guidance on the assessment of Neighbourhood Plans in light of the SEA Directive is contained within the [National Planning Practice Guidance](#). The guidance highlights three triggers that may require the production of an SEA, for instance where:

- a neighbourhood plan allocates sites for development
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

We have checked our records and based on the information provided, we can confirm that in our view the proposals contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect.

We are not aware of significant populations of protected species which are likely to be affected by the policies / proposals within the plan. It remains the case, however, that the responsible authority should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected.

Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SA/SEA is necessary.

Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SEA/SA screening stage, should the responsible authority seek our views on the scoping or environmental report stages. This includes any third party appeal against any screening decision you may make.

For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk

Yours sincerely

Sharon Jenkins
Consultations Team

Ecological Services
Green Infrastructure
Landscape and Visual Impact Assessment
Landscape Character Assessment
Habitats Regulations Assessment
Strategic Environmental Assessment
Sustainability Appraisal



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