

Strategic Environmental Assessment of the Stratford-upon-Avon Neighbourhood Plan

Screening Document

September 2013



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SEA Screening Document

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Abbreviations

AQMA	Air Quality Management Area
EIA	Environmental Impact Assessment
GI	Green Infrastructure
ODPM	Office of the Deputy Prime Minister
NP	Neighbourhood Plan
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SUDS	Sustainable Urban Drainage Systems

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1 Introduction

1.1 This report

- 1.1.1 This screening report has been prepared to determine whether the Stratford-upon-Avon Neighbourhood Plan (NP) should be subject to a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004.

1.2 Strategic Environmental Assessment

- 1.2.1 The basis for Strategic Environmental Assessment legislation is European Directive 2001/42/EC and was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, or SEA Regulations. Detailed guidance of these regulations can be found in the Government publication 'A Practical Guide to the Strategic Environmental Assessment Directive' (ODPM 2005).
- 1.2.2 Under the requirements of the European Union Directive 2001/42/EC (Strategic Environmental Assessment (SEA) Directive) and Environmental Assessment of Plans and Programmes Regulations (2004), specific types of plans that set the framework for the future development consent of projects, must be subject to an environmental assessment.
- 1.2.3 The 2008 Planning Act requires plan making bodies to comply with the SEA Directive by screening the plan's potential effects on the environment.

1.3 The Stratford-upon-Avon Neighbourhood Plan

- 1.3.1 The Stratford-upon-Avon Neighbourhood Planning website¹ explains that the creation of neighbourhood plans started with the Government's Localism Act which came into effect in April 2012. The Act sets 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; a new tier in planning policy which enables local people to shape the development of the community in which they live.

¹ <http://www.ourstratford.org.uk>

² <http://www.stratford.gov.uk/localplan/ELECTRONIC/Section7.pdf>

- 1.3.2 The process started in the summer of 2011 when Stratford-upon-Avon Town Council held a series of meetings to find volunteers who were representative of the community and willing to help prepare a NP for the area. These meetings led to the creation of the Neighbourhood Plan Steering Group which includes representatives from: The Stratford Society, Stratford Voice, Stratford Vision, Four residents' associations, Warwickshire Police, Clopton Forum, Three secondary schools, Old Stratford and Drayton Parish Council, Stratford BID, Accessible Stratford, SCAN, Stratford Churches Together, Stratford Town Trust, Transition Stratford, WCC, Stratford District Councillors, Stratford Town Council, VASA, and numerous skilled volunteers.
- 1.3.3 The steering group collected public views on what residents would like to change about the area and used these to create a set of planning objectives which they believed reflected most of the major planning concerns in the community, this formed the consultation draft of the NP (as shown on the website).
- 1.3.4 After consultation, any responses will be taken into account and used to prepare a 'submission draft' of the Neighbourhood Plan. This version of the plan will be subject to inspection by an independent examiner. If the examiner approves the NP it will be subject to a local referendum. If 50% or more of people voting in the referendum support the plan, the NP will be adopted.

Size

- 1.3.5 It is the largest and most populous town of Stratford-on-Avon district. Stratford-upon-Avon. Four electoral wards make up the urban town of Stratford: Alveston; Avenue and New Town; Mount Pleasant and Guild; and Hathaway. The estimated total population for the parish of Stratford-upon-Avon is 27,555 (ONS 2011).
- 1.3.6 The proposed Stratford-upon-Avon Neighbourhood Plan covers the administrative boundaries of Stratford upon Avon Town Council as well as Old Stratford and Drayton Parish Council. The boundary also includes the parishes of Alverston and Tiddington. **Figure 1.1** shows the current neighbourhood plan boundary.
- 1.3.7 The plan area is approximately 4 kilometres high by 10 kilometres wide. The census data states that the area of the parish of Stratford-upon-Avon is approximately 27,600 metres squared.



Figure 1.1: Neighbourhood Plan Boundary (Neighbourhood Plan Steering Group 2013)

Location

- 1.3.8 Stratford-upon-Avon is a market town in south Warwickshire, England. The town itself lies within the valley of the River Avon and has extended gradually in most directions, with a swathe of attractive open space alongside the river. The town is located 22 miles (35 km) south east of Birmingham and 8 miles (13 km) south west of Warwick.
- 1.3.9 The town's location on the River Avon means a section of the town (traced diagonally from north east to south west) is at significant risk of flooding from the river (see **Figure 1.2**).
- 1.3.10 The town is a popular tourist destination owing to its status as birthplace of the playwright and poet William Shakespeare. Stratford-upon-Avon attracts close to 3 million visitors a year (Stratford DC 2003). The town's historic core is designated as a conservation area and contains about 350 listed buildings. The substantial amount of tourists visiting Stratford-upon-Avon, the amount of cultural activities and restaurants these visitors support mean that tourism has an important role in the local economy.
- 1.3.11 The majority of land to the north of Stratford-upon-Avon town is designated as green belt land. This is shown in **Figure 1.3**. The intention of the green belt is to separate the West Midlands conurbation from smaller settlements. It includes areas around the settlements of Alcester, Henley-in-Arden and Studley and abuts the northern edges of Stratford-upon-Avon.

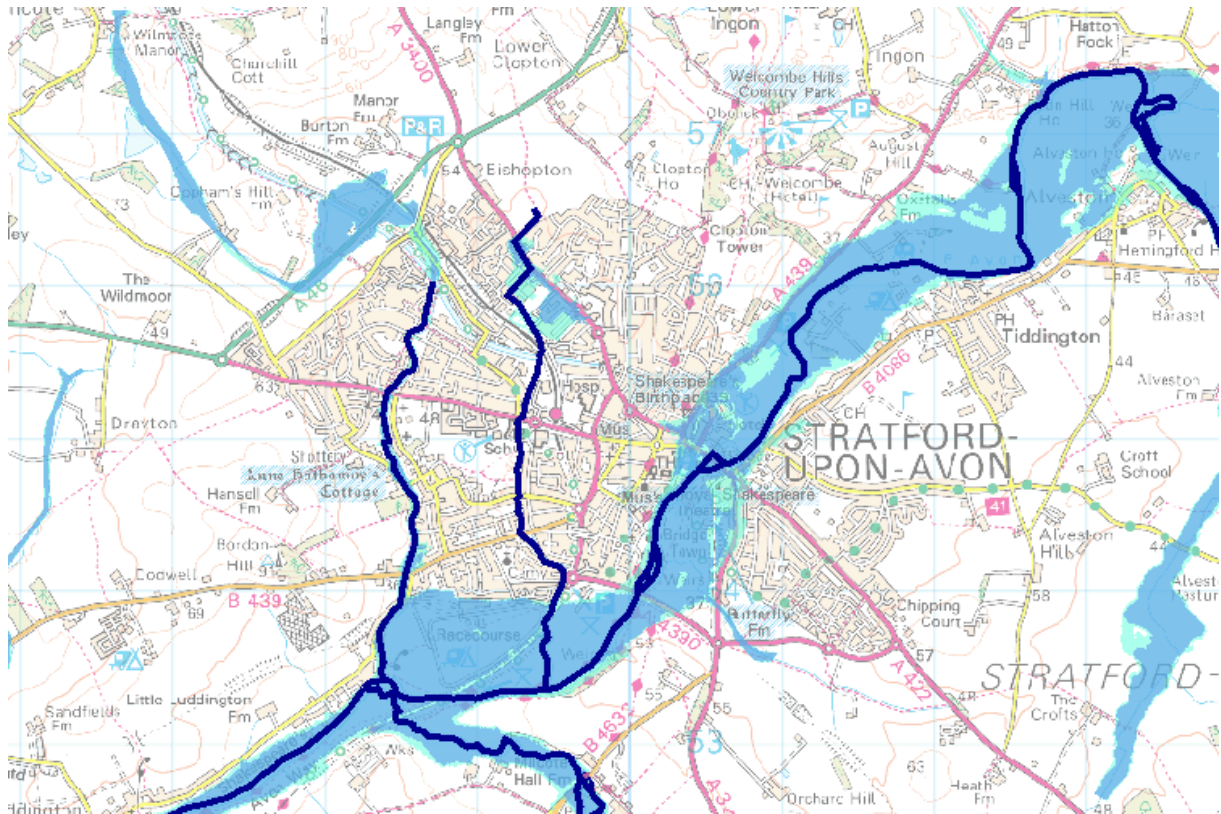


Figure 1.2: Risk of flooding from rivers and sea (Environment Agency 2013)

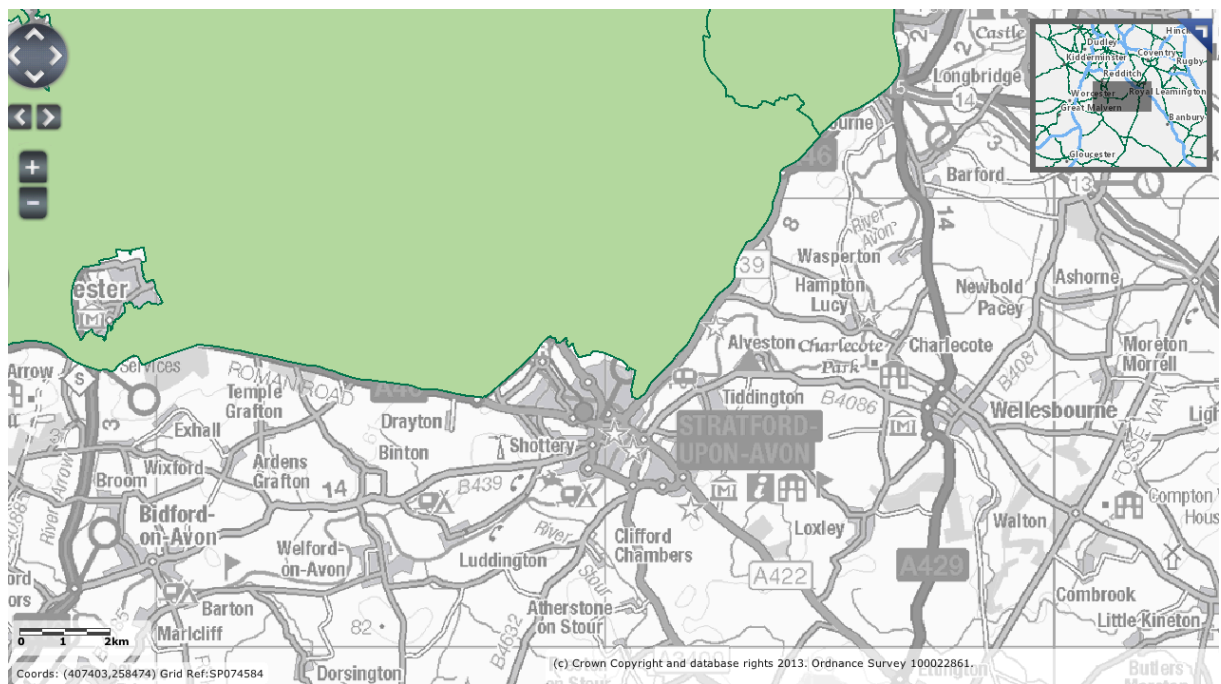


Figure 1.3: Green belt designations (MAGIC 2013)

1.3.12 The land surrounding Stratford-upon-Avon contains areas of agricultural land, some of which is classified as grade 2 agricultural land (grade 2 is shown on **Figure 1.4** as blue, grade 3a is dark green and grade 3b is light green). Grade 1 agricultural land is the most productive type.

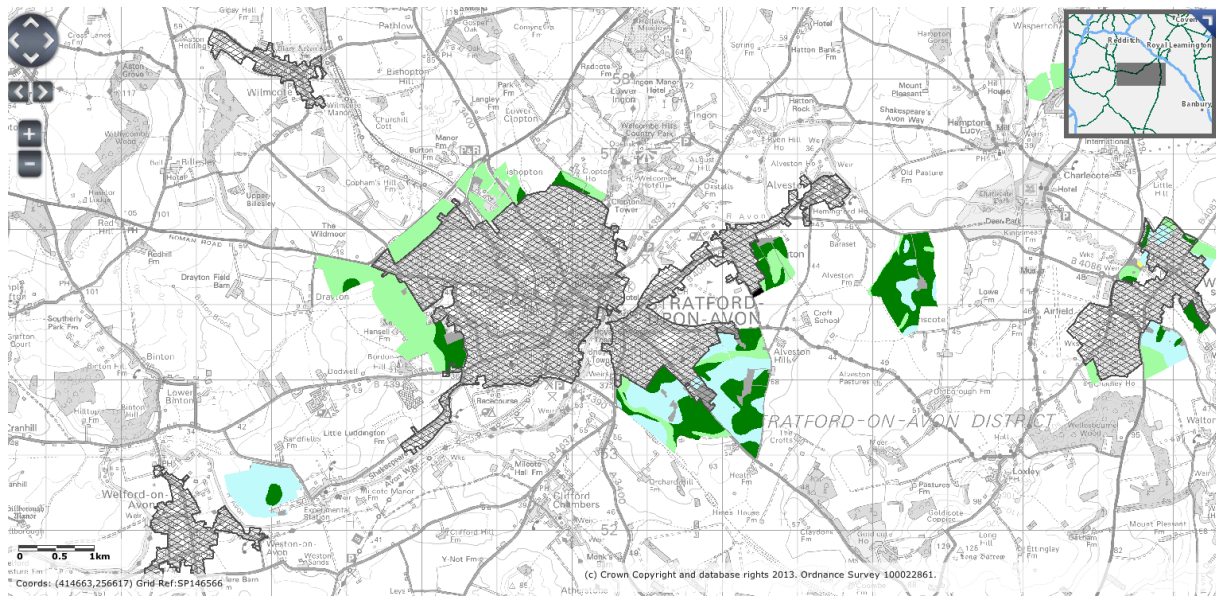


Figure 1.4: Agricultural land classifications (MAGIC 2013)

1.3.13 There are issues with the towns infrastructure. Roads leading into the town are frequently congested during peak times, and traffic movement in the town centre is often obstructed by large delivery vehicles and coaches. At the same time, large numbers of pedestrians are restricted to narrow footways².

Nature

1.3.14 The NP is a land-use plan, prepared for town and country planning and land-use and sets out a framework for future development consents within the Stratford-upon-Avon NP area. The NP is the lowest tier in the planning hierarchy and must conform to plans in the upper tiers such as the Stratford-upon-Avon Core Strategy, as well as National Policy such as the NPPF.

1.3.15 At this stage of the plan process the neighbourhood plan includes information about seven topics. On the website these topics are described:

- Housing - Meeting the needs of the community and demographic trends with high quality 'green' affordable lifetime homes
- Jobs - Maintaining and creating jobs for the thriving economy and tourist industry
- Heritage - Preserving and enhancing the towns historical core and heritage assets
- The Town Centre - Protecting and promoting the town's retail offer and creating a mixed use accessible centre with a diverse range of amenities and services
- Open Spaces - Preservation and creation of high quality green open spaces and networks of green corridors throughout the neighbourhood area
- Infrastructure - Ensuring that the building blocks for a sustainable future are planned and delivered to meet existing and future need of the community

² <http://www.stratford.gov.uk/localplan/ELECTRONIC/Section7.pdf>

- Community, Leisure and Wellbeing - Encouraging a strong community as well as protecting and improving the provision of leisure, healthcare and education facilities

2 The Screening Process

2.1 Strategic Environmental Assessment screening

2.1.1 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 Directive and Schedule I of the Regulations. A determination cannot be made until the three statutory consultation bodies have been consulted: The Environment Agency, Natural England and English Heritage.

2.1.2 Within 28 days of making its determination, the plan makers 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 Neighbourhood Plans to be in general conformity with the strategic policies of the Local Plan. Stratford-on-Avon District Council is currently consulting on its Core Strategy. The Neighbourhood Plan must be in general conformity with this document.

2.2.2 The Core Strategy was subject to a Sustainability Appraisal which combined to assess the plan for significant effects under the SEA Directive as well. mitigation measures were suggested where relevant.

2.2.3 **Figure 2.1** shows a diagram prepared by ODPM (2005) which shows the application of the SEA process to plans and programmes. The sequential approach in the flow diagram can be used to screen the Stratford-upon-Avon NP.

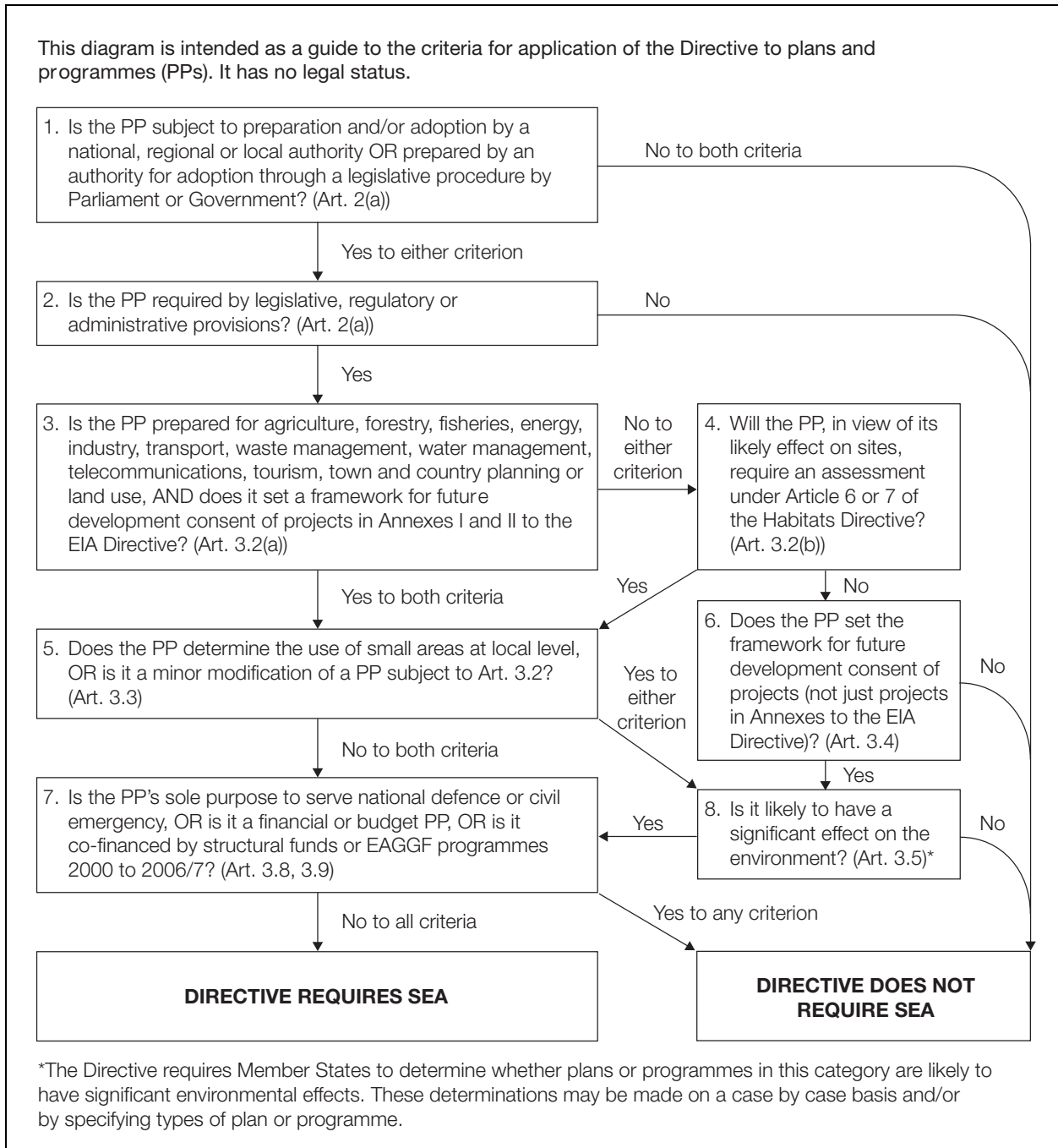


Figure 2.1: Application of the SEA Directive to plans and programmes (ODPM, 2005)

Table 2.1: Establishing whether there is a need for SEA

Stage	Y/N	Reason
1. 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))	Y	The plan constitutes a NP, which will be adopted by Stratford-on-Avon District Council if it receives 50% or more affirmative votes at a referendum.
2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))	N	Communities and neighbourhoods have a right to produce a NP, however it is not required by legislative, regulatory or administrative purposes. 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.
3. 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))	Y	The NP is a land-use plan and sets the framework for future development consents within the Stratford-upon-Avon NP area. Due to the neighbourhood quality of the plan, development projects contained in Annex I is unlikely. It is possible the NP could contain infrastructure projects which are listed in Annex II of Directive 97/11/EC, such as urban development projects, which may be subject to EIA if they are considered as having significant effects on the environment.
4. 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))	N	HRA screening has been undertaken on the Stratford-on-Avon Core Strategy and has been screened out of further assessment. Therefore the NP is unlikely to require HRA.
5. Does the PP determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art. 3.2? (Art. 3.3)	To Be Confirmed	The NP identifies sites for specific uses, for example housing, employment and GI.
6. Does the PP set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3.4)	Y	The NP sets policies which planning application within the Stratford-upon-Avon NP area must adhere to.
7. Is the PP's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art 3.8, 3.9)	N	The NP has other purposes.
8. Is it likely to have a significant effect on the environment? (Art. 3.5)	Y	See Section 2.3.

2.3 Determination of significant effects

2.3.1 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 determine the likely significance of effects. Question 8 within the ODPM guidance (see **Figure 2.1**) referred to whether the NP would have a significant effect on the environment. **Table 2.2** discusses the likely effects of the NP.

Table 2.2: Criteria and response of screening

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	<p>As shown in Section 1.2 the Stratford-upon-Avon NP will establish the development control framework for the town of Stratford-upon-Avon and surrounding environs.</p> <p>The NP is prepared for town and country planning and land use and sets out a framework for future development in Stratford-upon-Avon. The nature of the NP includes housing, open space, infrastructure and employment development, which may fall under 10(a & b) of Annex II of the EIA directive.</p>
(b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy	<p>The NP is the lowest tier in the planning hierarchy and must conform to plans in the upper tiers rather than influence them. In this case the NP must conform to plans including the Stratford-on-Avon Core Strategy, the National Planning Policy and European Directives.</p>
(c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development	<p>The NP has relevance in this section; there are opportunities for integrating environmental considerations within Stratford-upon-Avon. The introductory text to the NP includes the following text:</p> <p>“Existing green and open spaces need to be protected and improved, with measures to safeguard and enhance the town’s biodiversity and natural environment – in particular the River Avon corridor and the town’s trees. New developments must include green space, which ideally should be connected to other green space, and new housing developments must provide garden and food growing space, either as part of the property or as nearby allotments.”</p>
(d) environmental problems relevant to the plan or programme	<p>Key issues taken from the Stratford-on-Avon Scoping Report and SA Report of the Intended Proposed Submission Core Strategy which are relevant to the plan include:</p> <ol style="list-style-type: none"> 1. Congestion issues in and around

	<p>Stratford-upon-Avon</p> <ol style="list-style-type: none"> 2. There is an Air Quality Management Areas (AQMA) in Stratford-upon-Avon 3. Growth planned for Stratford-on-Avon will place pressures on biodiversity. Potential impacts include habitat fragmentation resulting from new development areas and recreational pressures on wildlife sites. 4. Effects on the historic environment from inappropriate and poor design and layout of housing, employment and retail provision. Stratford-upon-Avon is a town of national and international significance associated with cultural heritage; being the birthplace of William Shakespeare. 5. Green Infrastructure: There are significant opportunities to improve linkages between areas of open space, parks and the open countryside. 6. Fluvial flooding is a significant risk in Stratford-upon-Avon and climate change is likely to increase the risk of all types of flooding present in the district. 7. Inadequate number of school places.
<p>(e) the relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection)</p>	<p>The NP is a land-use plan and sets the framework for future development consents within the Stratford-upon-Avon NP area.</p> <p>The NP sets policies which planning application within the Stratford-upon-Avon NP area must adhere to.</p>
<p>Characteristics of the effects and of the area likely to be affected</p>	
<p>(a) the probability, duration, frequency and reversibility of the effects</p>	<ol style="list-style-type: none"> 1. Development both within the town and elsewhere is likely to impact on congestion frequently. The effect is not likely to be reversible within the lifetime of the plan and constitutes long-term effects. 2. It is highly likely that development will affect the AQMA through increased traffic. There are both short and long-term effects of increasing traffic, with a moderate increase in emissions in the short-term. In the long term the effects of an emphasis on public transport and improvements in technology lead to a slower rate of increase (or decrease) in emissions. 3. Effects on biodiversity are likely to be long term and irreversible, although less frequent due to the majority of the NP area being urban. 4. The historic environment represents an important receptor within Stratford-upon-Avon. Adverse effects are likely to be irreversible meaning historic assets will require protecting through sensitive and appropriate design and

	<p>location of new development, as well as sympathetic changes to the urban realm of which these features are a part.</p> <p>5. The canal network, its surroundings and other green areas in Stratford-upon-Avon are examples of Green Infrastructure (GI) and are vital to the health and wellbeing of Stratford-upon-Avon residents and visitors, as well as providing a stronghold for biodiversity within the area. These features provide an opportunity for improvement in the long-term.</p> <p>6. Climate change predictions for the area forecast that the frequency, probability and duration of flood events is likely to increase in the long term. Climate change is an important receptor to consider within the neighbourhood due to the current flood risk attributed to the water bodies of the area and the size of the population likely to be affected. Flood risk also poses a risk to human health.</p> <p>7. The lack of school places within Stratford-upon-Avon is likely to have a significant effect on the availability of education for children. Preventing education, reducing its availability or accessibility leads to long term adverse effects such as unemployment and deprivation.</p>
(b) the cumulative nature of the effects	<p>The plan has the potential to cause cumulative impacts since Stratford has a strong geographic relationship with surrounding towns and villages as well as larger cities like Birmingham and Worcester. The exact significance of these effects can only be explored as the plan progresses. On a precautionary basis, the plan should be screened in so that the potential nature of cumulative effects associated with transport levels, new development, climate change and economic growth can be fully understood.</p>
(c) the transboundary nature of the effects	<p>The majority of effects are localised. However air quality effects and impacts on water quality demand are likely to be transboundary. Due to the natural and historic assets of national interest, effects upon heritage and GI could also have transboundary effects.</p>
(d) the risks to human health or the environment (for example, due to accidents)	<p>Stratford-on-Avon currently has an AQMA. The purpose of this designation is to reduce levels of nitrogen dioxide NO₂ and Particulate Matter PM10 associated with congestion and overall high levels of traffic in a built up area. This is a health risk to the local population. The NP is likely to</p>

	increase traffic levels, the effects of which will require avoiding or mitigating through the SEA and EIA process.
(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	Stratford-on-Avon is the largest settlement in a rural district and is linked geographically with the surrounding towns and villages. It is also recognised as being popular with out commuters; people who live in the attractive environments of Stratford and enjoy good quality schools but travel to work by car. The indirect spatial extent of the plan may extend beyond the immediate area of the plan and this relationship should be explored in the SEA to understand the significance of any environmental effects arising from the plan.
(f) the value and vulnerability of the area likely to be affected due to: (i) special natural characteristics or cultural heritage (ii) exceeded environmental quality standards or limit values (iii) intensive land-use	(i) The important historic quality of the town is fundamental to the cultural character of Stratford-upon-Avon. Damage to the historic character of the area would have a significant impact due to its high value. (ii) The whole of Stratford-upon-Avon town (as well as some of the surrounding areas) is a designated AQMA (since 2010), further development, and the consequent additional residents and traffic it brings, could cause the area to continue to exceed the nitrogen dioxide objective, making the area vulnerable. (iii) n/a
(g) the effects on areas or landscapes which have a recognised national, Community or international protection status	Stratford-upon-Avon has a internationally significant historic environment due to its connection with William Shakespeare which attracts international tourists; development in the area could detract from its character. The area to the north of Stratford-upon-Avon (approximately in line with the A46) is designated green belt land; the proposed development could affect the integrity of the areas countryside through development on areas of landscape sensitivity. In addition, Stratford-upon-Avon has areas of high productivity agricultural land with areas of grade 2, 3a and 3b land situated around the urban area (Figure 1.4). Development outside of the urban section of the town could lead to a reduction in agricultural land. There are locally important and nationally designated sites of biodiversity interest within the NP area (see Figure 2.2). Although the NP seeks to protect open and green spaces there is no explicit reference to these important assets and development could reduce the amount of priority habitat in the area.

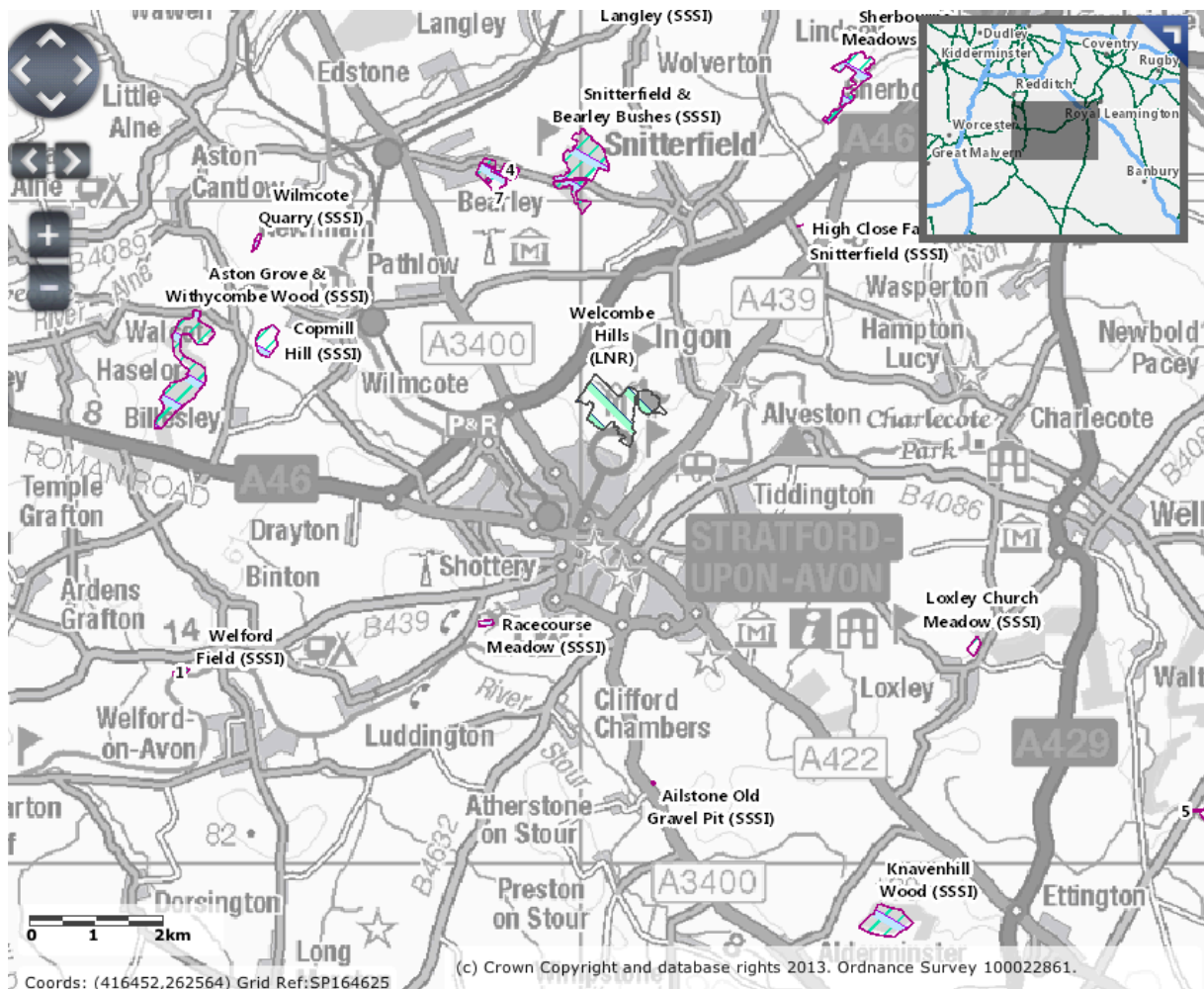


Figure 2.2: Statutory land-based designations (MAGIC, 2013)

2.4 Screening outcome and reasons for determination

2.4.1 The Stratford-upon-Avon Neighbourhood Plan will conform with the strategic influence of the Stratford-on-Avon Core Strategy. The Neighbourhood Plan will influence where housing should be located as well as influence design across the plan area. Both of these factors can be significant environmental determinants.

2.4.2 This screening report has explored the potential effects of proposed the Stratford-upon-Avon NP with a view to determining the likely requirement for an environmental assessment under the SEA Directive. Results of the screening process indicate that there is uncertainty associated with the size, nature and location of likely proposals in the NP. Significant environmental impacts are likely to occur if aspects of the plan are not implemented in a way that either seeks to avoid the effects or mitigate the effects such that there are no residual adverse effects.

2.4.3 In accordance with topics cited in Annex 1(f) of the SEA directive, likely significant effects on the environment are expected to include population, human health, soil, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.

2.4.4 Identified effects include:

- Air quality - the presence of an AQMA in the area already;
- Flooding - an area of significant flood risk;
- Heritage assets - Stratford-upon-Avon town centre is a conservation area with an abundance of listed buildings; and
- Soil - grade 2 to the south and east of Stratford-upon-Avon town.

2.4.5 Transboundary effects are also likely and should be explored in an SEA of the plan.

2.4.6 On this basis, the Stratford-upon-Avon Neighbourhood Plan should be screened in to the SEA process.

References

Environment Agency (2013) What's in your backyard. Available at: <http://www.environment-agency.gov.uk/homeandleisure/37793.aspx>

Natural England (2013) MAGIC. Available at: <http://www.natureonthemap.naturalengland.org.uk/MagicMap.aspx>

Neighbourhood Plan Steering Group (2013) Stratford-Upon-Avon Neighbourhood Plan. Available at: <http://www.ourstratford.org.uk>

ODPM (2005) A practical guide to the Strategic Environmental Assessment Directive. Available at: <https://www.gov.uk/government/publications/strategic-environmental-assessment-directive-guidance>

ONS (2011) Census: Neighbourhood statistics. Available at: <http://neighbourhood.statistics.gov.uk/dissemination/>

Stratford-on-Avon District Council (2010) Air Quality Management. Available at: <https://www.stratford.gov.uk/community/the-local-perspective-air-quality-management.cfm>

Stratford-on-Avon District Council (2012) Stratford-upon-Avon Neighbourhood Area Application. Available at: <https://www.stratford.gov.uk/planning/neighbourhood-area-consultations.cfm>

United Nations (1992) Report of the United Nations Conference on Environment and Development. Available at: <http://www.un.org/documents/ga/conf151/aconf15126-1annex1.htm>

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