

Strategic Environmental Assessment of the Brailes Neighbourhood Plan

Environmental Report
October 2017



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Environmental Report

LC-320	Document Control Box
Client	Brailes Neighbourhood Development Plan Group
Report Title	Strategic Environmental Assessment of the Brailes Neighbourhood Plan
Status	Final
Filename	LC-320_Brailes_NDP_SEA_Report_10_131017DS.docx
Date	September 2017
Author	DS
Checked	JE
Approved	ND

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SEA is a tool for predicting potential significant effects. The actual effects may be different from those identified. Prediction of effects is made using an evidence-based approach and incorporates a judgement.

The assessments above are based on the best available information, including that provided to Lepus by the Council and information that is publicly available. No attempt to verify these secondary data sources has been made and they have assumed to be accurate as published.

Every attempt has been made to predict effects as accurately as possible using the available information. Many effects will depend on the size and location of development, building design and construction, proximity

to sensitive receptors such as wildlife sites, conservation areas, flood risk areas and watercourses, and the range of uses taking place. The assessment was prepared in September 2017 and is subject to and limited by the information available during this time.

This report has been produced to assess the sustainability effects of the Brailes Neighbourhood Development Plan (NDP) and meets the requirements of the SEA Directive. It is not intended to be a substitute for Environmental Impact Assessment (EIA) or Appropriate Assessment (AA).

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Acronyms

A&E	Accident and Emergency
AA	Appropriate Assessment
ALC	Agricultural Land Classification
AONB	Area of Outstanding Natural Beauty
BUAB	Built Up Area Boundary
DCLG	Department for Communities and Local Government
DEFRA	Department for Environment, Food and Rural Affairs
DPD	Development Plan Document
EIA	Environmental Impact Assessment
GI	Green Infrastructure
GP	General Practitioner
LWS	Local Wildlife Site
NDP	Neighbourhood Development Plan
NPPF	National Planning Policy Framework
ODPM	Office of the Deputy Prime Minister
PDL	Previously Developed Land
PPG	Planning Practice Guidance
PPP	Policies, Plans and Programmes
PRoW	Public Right of Way
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SHLAA	Strategic Housing Land Availability Assessment
SM	Scheduled Monument

Non-Technical Summary

What is Strategic Environmental Assessment?

- N1** Lepus Consulting is conducting a Strategic Environmental Assessment (SEA) of the Brailes pre-submission Neighbourhood Development Plan (NDP) on behalf of Brailes NDP Steering Group and Stratford-on-Avon District Council. SEA is the process of informing and influencing the preparation of the NDP to help optimise the environmental performance of the plan.
- N2** This document is known as an Environmental Report (SEA Report). It includes the requirements of an Environmental Report in accordance with the SEA Directive.

Purpose and content of the Environmental Report

- N3** The purpose of this Environmental Report is to:
- Identify, describe and evaluate the likely significant effect of the NDP on environmental factors;
 - Suggest measures by which any adverse effects could be mitigated;
 - Make recommendations to improve the environmental performance of the NDP; and
 - Provide an effective opportunity for statutory consultees, interested parties and the public to offer views on any aspect of the SEA process that has been carried out to date.
- N4** The Environmental Report contains:
- An outline of the contents and main objectives of the NDP and its relationship with other relevant plans, programmes and strategies;
 - The SEA Framework of objectives and indicators against which the plan has been assessed;
 - A summary of the reasonable alternatives stage of the NDP;
 - The likely significant effects of the NDP in environmental terms;
 - The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects which may arise as a result of the plan;
 - A description of the measures envisaged concerning monitoring; and
 - The next steps for the SEA.
- N5** This report is one in a series of SEA Reports that have been prepared to facilitate an iterative and informative approach to SEA for the NDP. The stages of plan preparation and the associated SEA work are detailed below.

The screening stage

- N6** Stratford-on-Avon District Council undertook a screening assessment¹ of the Brailes NDP in June 2017 to determine whether the NDP should be screened into the SEA process. This assessment determined that the NDP had the potential to lead to likely significant effects on the environment because of potential adverse impacts to the local landscape, thus it was screened into the SEA process in accordance with the SEA Directive. Statutory bodies agreed with this conclusion, citing that development in close proximity to the

¹ Lepus Consulting (2016) Strategic Environmental Assessment of the Brailes & Winderton Neighbourhood Development Plan: SEA Screening Document

Cotswolds Area of Outstanding Natural Beauty, in addition to the range of historical and cultural assets within the local area, could potentially result in significant adverse effects to the local environment.

The scoping stage

N7 The first stage of the SEA was to prepare a Scoping Report². The Scoping Report identified relevant policies, plans, and programmes (PPPs) and baseline information relating to environmental issues in the area. The scoping report also set out a series of objectives for environmental protection and a SEA framework, against which the NDP was to be assessed. The SEA Framework included the following SEA Objectives for which indicators and decision-making criteria are identified:

- Cultural heritage;
- Landscape;
- Biodiversity and geodiversity;
- Flooding;
- Climate change;
- Natural resources;
- Pollution;
- Waste;
- Transport;
- Accessibility;
- Housing;
- Health, safety and wellbeing; and
- Economy.

Assessment of reasonable alternatives

N8 In the UK, reasonable alternatives are commonly referred to as 'options'. The assessment of reasonable alternatives refers to the plan-making stage of exploring policy options. The Brailes NDP Steering Group started the plan-making process with an identification of potential development policies and sites, via the Strategic Housing Land Availability Assessment (SHLAA), a call for sites and through the Stratford-on-Avon District Core Strategy 2011 - 2031.

Pre-submission NDP

N9 Every policy within the pre-submission NDP and potential site allocation (reasonable alternative obtained from initial call for sites) was assessed against the SEA Framework to identify positive and adverse impacts on each SEA Objective. The findings are presented in a scoring matrix format and are accompanied by an explanatory narrative on identified effects. The matrix is not a conclusive tool. Its main function is to show visually whether the NDP proposals are likely to bring positive, adverse or uncertain effects in relation to the SEA Objectives. The explanatory narrative within the accompanying tables is used to interpret the matrix findings. SEA findings have been summarised in **Table N1** and **Table N2**.

² Lepus Consulting (2017) Strategic Environmental Assessment of the Brailes & Winderton Neighbourhood Development Plan: Scoping Report

Table N1: Potential positive environmental effects of the pre-submission NDP

Cultural Heritage
The NDP contains policies which are anticipated to help protect the setting of heritage assets and preserve the overall sense of place and local distinctiveness of the area. These policies include plans to adhere to the guidelines set out in the Brailes Village Design Statement (1998), make use of appropriate screening to protect the setting of cultural assets and to ensure the scale of development is small.
Landscape
The NDP contains policies which are likely to protect the landscape character of the area. These policies include protecting and enhancing the existing green spaces and green infrastructure (GI) within the area, ensuring the design of new settlements is consistent with existing buildings and ensuring high levels of tranquillity are maintained following development.
Biodiversity and Geodiversity
The NDP contains policies which are likely to have a positive impact on the biodiversity value in the area through protecting local green spaces, whilst ensuring existing habitats are protected and new high-quality habitats are created.
Flooding
The NDP contains policies which are anticipated to reduce the number of residents at risk of flooding within the area. This will be achieved through undertaking flood risk assessments prior to development and integrating flood mitigating measures, such as sustainable urban drainage systems (SuDS), within new developments. Some proposed sites (reasonable alternatives) are in areas at the lowest risk of fluvial and surface water flooding, reducing the proportion of residents at risk of flooding within the area. Of the preferred options, none are thought to be at risk of fluvial flooding, with Site 1 and Site 4 also at very low risk of surface water flooding.
Climate Change
The NDP contains policies which are anticipated to reduce the area's contribution towards climate change through promoting energy efficiency and, where possible, integrating renewable energy production within new developments.
Natural Resources
The NDP contains policies which are anticipated to make best use of the region's natural resources through re-using previously developed (brownfield) land and redundant agricultural buildings.
Pollution
The NDP contains policies which are likely to reduce air, noise, soil, light and water pollution through maintaining GI for its natural air filtering and carbon sink qualities, ensuring high levels of tranquillity are maintained and through promoting energy efficiency and renewable energy.
Waste

The NDP contains policies which are likely to achieve more sustainable management of waste and reduce waste generation. This will be achieved through the use of recycled and reclaimed materials for construction where possible.

Transport

The NDP contains policies which are likely to reduce the needs for residents to travel through encouraging them to work from home. This will be achieved through improving access to communications and designing dwellings with spaces to accommodate working from home. The Public Right of Way (PRoW) network around all sites is seen to be good.

Accessibility

The NDP contains policies which are likely to reduce barriers for those living in rural areas through encouraging residents to work from home, providing affordable housing in rural locations and encouraging the sustainable economic development of the area.

Housing

All sites are anticipated to make a positive contribution to the housing need of the area. Some policies within the NDP also positively impact the housing objective through ensuring the new dwellings that are delivered are high quality and contribute to the local character of the area.

Health, Safety and Wellbeing

The NDP contains policies which are anticipated to make a positive contribution to the mental and physical health of residents through retaining local green spaces and ensuring good access for residents to natural spaces.

Economy

The NDP contains policies which are likely to benefit the local economy through encouraging residents to work from home whilst retaining and protecting existing employment sites.

Table N2: Potential negative environmental effects of the pre-submission NDP

Cultural Heritage
<p>Given the historic features and cultural assets within Brailes, development at all sites was assessed to be likely to have an adverse effect on cultural heritage. The greatest impacts are associated with having an adverse effect on the setting of Listed Buildings or Castle Hill Scheduled Monument (SM). The potentially adverse impacts to archaeological remnants also contributed to the negative scores at some sites. Development at Site 2 is anticipated to have a significant adverse impact on the setting of Castle Hill SM.</p>
Landscape
<p>As all sites are within the AONB and in a rural area, all sites were assessed to have a negative impact for landscape. Significant impacts were seen where views from existing monuments, settlements or public footpaths were likely to be adversely affected. Development at Sites 2 and 4 is anticipated to have a significant negative impact the landscape character of the area.</p>
Biodiversity and Geodiversity
<p>Some of the sites assessed were seen to have the potential to adversely impact the biodiversity of the area. Loss of woodland and disturbance to potential local wildlife sites (LWSs), marshy habitats and hedges were the main reasons for this. Development at all preferred options is anticipated to result in no adverse impacts to local biodiversity by avoid these the loss or disturbance of these habitats.</p>
Flooding
<p>Some of the sites were assessed to be at risk of fluvial and/or surface water flooding. Two of the sites assessed had areas of Flood Zones 2 & 3 associated with Sutton Brook. Surface water flooding is seen to be a problem in Brailes as the soil has impeded drainage which is likely to lead to overland flow³. Two of the preferred options are at some risk of surface water flooding, with Site 2 containing areas at high risk.</p>
Climate Change
<p>Development at all sites is likely to have a negative effect on mitigating the causes of climate change, largely because residents are anticipated to have a high reliance on personal car. Further to this, development at all sites is anticipated to result in the loss of GI, which results in a loss of the natural air filtering and carbon sink qualities of the local land cover. The increased energy consumption and GHG emissions of developed sites over their current uses also contributes to the negative scores seen for climate change.</p>
Natural Resources
<p>All sites scored negatively for natural resources, but none significantly. Negative scores were given due to all sites currently being largely undeveloped green field sites with and Agricultural Land Classification (ALC) of Grade 3, which could potentially be a highly valuable agricultural resource.</p>
Transport

³ Cranfield Soil and Agrifood Institute: Soilscales. Available at: <http://www.landis.org.uk/soilscales/>

All sites were considered to have poor access to sustainable transport modes, with residents anticipated to have a high reliance on personal car use.
Accessibility
All sites were considered to have poor accessibility overall, with residents likely to have to travel by car to access key amenities and services.
Health, Safety and Wellbeing
Due to poor access to health services such as a General Practitioner (GP), Accident and Emergency (A&E) or a leisure centre, all sites are anticipated to make accessing key health and wellbeing services relatively difficult for prospective residents.
Economy
Development at sites currently used for pasture or agricultural purposes were seen to have a potentially negative impact on the local economy.

- N10** Four preferred options are present within pre-submission NDP, chosen based upon the site-assessments within this report, alongside other aspects of the compiled evidence base. The preferred options represent four of the reasonable alternatives assessed. They have revised site boundaries and are, therefore, assessed in **Chapter 5**. These assessments reveal that sustainability performance in relation to flooding, biodiversity and landscape is improved for some of the preferred options due to the revised site boundaries.

Mitigation and Recommendations

- N11** In cases where potentially adverse effects have been identified, mitigation suggestions have been given in **Chapter 7**. Mitigation should be considered as part of a sequential hierarchy to deal with adverse effects: avoid, reduce, and then compensate. Mitigation prescriptions might include changes to policy wording, advocating design guides, offsetting biodiversity effects or provision of new supporting GI. In the case of this SEA Report, mitigation has been supplied to help address potential negative effects associated with classifications of uncertainty or adverse effects in the assessment process so that, if possible, positive or no residual affects remain.

Monitoring

- N12** **Chapter 8** of the SEA Report explains why there should be a monitoring programme for measuring the NDP's implementation in relation to the areas where the SEA has identified significant effects, and where opportunities for an improvement in environmental performance may arise. Monitoring for the SEA could be carried out in conjunction with other monitoring processes carried out by Stratford-on-Avon District Council.

Conclusions

- N13** Having appraised the NDP, the process has identified both positive and negative effects. Through applying a suite of mitigation measures, it is possible to ensure that most of the residual significant adverse effects are overcome. Whilst mitigation has been proposed for some effects, where this is not possible or likely to mitigate the nature of effect such that it is nullified, the

following residual significant adverse effects remain and are drawn to the attention of the plan makers. These include potentially negative effects associated with:

- Cultural heritage;
- Landscape;
- Climate change;
- Access to health services; and
- Transport and accessibility.

N14 Overall, the four preferred options are seen to be some of the best performing sites of those assessed. The assessment scores for Sites 1, 3 and 4 reveal that these locations are likely to be the most appropriate sites for development. However, the assessment scores for Site 2 are comparatively worse, with adverse impacts to landscape and cultural heritage, in addition to having a high risk of surface water flooding, identified. Due to these significant impacts, development is not seen to be as suitable for housing development as the other preferred options.

Next Steps

N15 This Environmental Report (ER) will be published alongside the pre-submission NDP and a period of consultation will follow, providing the opportunity for individuals, businesses and other organisations to submit representations regarding the ER. Stratford-on-Avon District Council will consider whether the plan is suitable to submit to an independent examiner. If changes to the NDP result in the need for further SEA work, this will need to be undertaken prior to being submitted to the examiner. If the examiner deems the NDP to meet the basic conditions set out in the Town and Country Planning Act⁴ (as amended), it will be subject to local referendum. If over 50% of votes are in favour of the NDP, the NDP will be adopted as part of the development plan.

⁴ Town and Country Planning Act 1990. Available at: <https://www.legislation.gov.uk/ukpga/1990/8/contents>.

1 Introduction

1.1 Introduction

1.1.1 Lepus Consulting is conducting an SEA of the Brailes pre-submission Neighbourhood Development Plan (NDP) (version 29, September 2017), on behalf of Brailes NDP Steering Group and Stratford-on-Avon District Council (SDC). SEA is the process of informing and influencing the progression of development plan documents (DPDs) to maximise the environmental credentials of the plan. This report should be considered through the on-going evolution of the NDP.

1.1.2 This document constitutes the SEA for the NDP and represents an Environmental Report (SEA Report) under the requirements of the SEA Directive. This represents Stage C of SEA (see **Figure 1**), according to the Office of the Deputy Prime Minister's (ODPM's) (2005) A Practical Guide to the SEA Directive⁵. This report also documents Stage B of SEA, developing and refining alternatives and assessing effects.

1.1.3 SEA is the process of informing local development plans to maximise the environmental value. SEA is a statutory requirement for local development plan documents. SEA is also one of the 'tests of soundness' that planning inspectors use to evaluate the soundness of development plan documents (DPDs), according to the Environmental Assessment of Plans and Programmes Regulations, 2004 (the SEA Regulations). The key objective of SEA is to promote a high level of environmental protection. The SEA is an objective assessment that helps to inform the identification of preferred options and the best way of implementing these with regards to environmental factors, but it does not necessarily dictate what these will be.

1.1.4 Sustainability Appraisal (SA) is a UK-specific procedure used to appraise the sustainability impacts and effects of development plans in the UK. SA is not required for NDPs.

1.2 Purpose of this report

1.2.1 This report has been prepared to help inform the Brailes NDP Steering Group's preparation of the NDP. It is not the role of the SEA to decide which is the most appropriate alternative from those set out in the NDP, rather it is an assessment of the alternatives to be given due consideration in the decision-making process and identification of the best performing option.

⁵ ODPM (2005) A Practical Guide to the Strategic Environmental Assessment Directive

- 1.2.2 Article 5(1) of the SEA Directive states that:
- ‘Where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. The information to be given for this purpose is referred to in Annex I.’
- 1.2.3 Planning Practice Guidance (PPG) Paragraph: 018 Reference ID: 11-018-20140306 states that:
- ‘Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable.’
- 1.3 History of the Brailes NDP**
- 1.3.1 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.
- 1.3.2 Approval to prepare the Plan was given by SDC in June 2014 through the approval of the application to designate the NDP area which was based on the Parish boundary. Evidence gathering for this Plan has methodically and openly followed a process with the emphasis on extensive community engagement and researching and assessing the facts.
- 1.3.3 Following designation, a Brailes NDP Steering Group was formed which included representatives from the parish. The Steering Group had their first public meeting in July 2013 and proceeded to collect public views on what residents would like to change about the area. These opinions were used to create a set of planning objectives which they believed reflected most of the major planning concerns in the community, culminating in the latest draft of the NDP, published online in September 2017.
- 1.3.4 The NDP will be published for consultation to provide an opportunity for the public and local organisations to comment and give feedback.

1.3.5 After consultation, responses will be taken into account and used to prepare a 'Submission Version' NDP. This version of the plan will be subject to inspection by an independent examiner. If the examiner approves the NDP it will be subject to a local referendum. If 50% or more of people voting in the referendum support the plan, the NDP will be adopted. Once adopted, planning decisions in the area will be made in accordance with the NDP and the Stratford-on-Avon District Council Core Strategy.

1.4 The SEA process

1.4.1 The European Union Directive 2001/42/EC or 'SEA Directive' applies to a wide range of public plans and programmes on land use, energy, waste, agriculture, transport etc. (see Article 3(2) of the Directive for other plan or programme types). The SEA procedure can be summarised as follows: an environmental report is prepared in which the likely significant effects on the environment and the reasonable alternatives of the proposed plan or programme are identified. The public and the relevant environmental authorities are informed and consulted on the draft plan or programme and the environmental report prepared. Further details on methodology are explained in **Chapter 3**.

1.4.2 The SEA Directive has been transposed into English law by the 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).

1.4.3 Under the requirements of the SEA Directive and Regulations, specific types of plans that set the framework for the future development consent of projects, must be subject to an environmental assessment.

1.4.4 Where a NDP could have significant environmental effects, it may fall within the scope of the SEA Regulations and so require a SEA. One of the basic conditions that will be tested by the independent examiner is whether the making of the Brailes NDP is compatible with European obligations.

1.4.5 Whether a NDP requires a SEA, and (if so) the level of detail needed, will depend on what is proposed in the draft version of the NDP. A SEA may be required, for example, where:

- The Brailes area contains sensitive natural or heritage assets that may be affected by the proposals in the plan; or
- The Brailes NDP may have significant environmental effects that have not already been considered and dealt with through a SA of higher order plans.

1.4.6 The key stages of NDP preparation and their relationship with the SEA process are shown in **Figure 1.1**, which is taken from National PPG produced by the Department for Communities and Local Government (DCLG).

1.5 Best Practice Guidance

1.5.1 A range of guidance documents has been utilised in preparing the SEA of the Brailes NDP. These are presented in **Box 1.1**.

Box 1.1: Best Practice Guidance for SEA

Lepus follows national guidance and best practice standards set out for SEA, including:

- European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plans and programmes on the environment
- Office of the Deputy Prime Minister (September 2005): A Practical Guide to the SEA Directive
- Department for Communities and Local Government (2012) National Planning Policy Framework
- Department for Communities and Local Government (2015) Planning Practice Guidance [online], available at:
<http://planningguidance.planningportal.gov.uk/blog/guidance/>

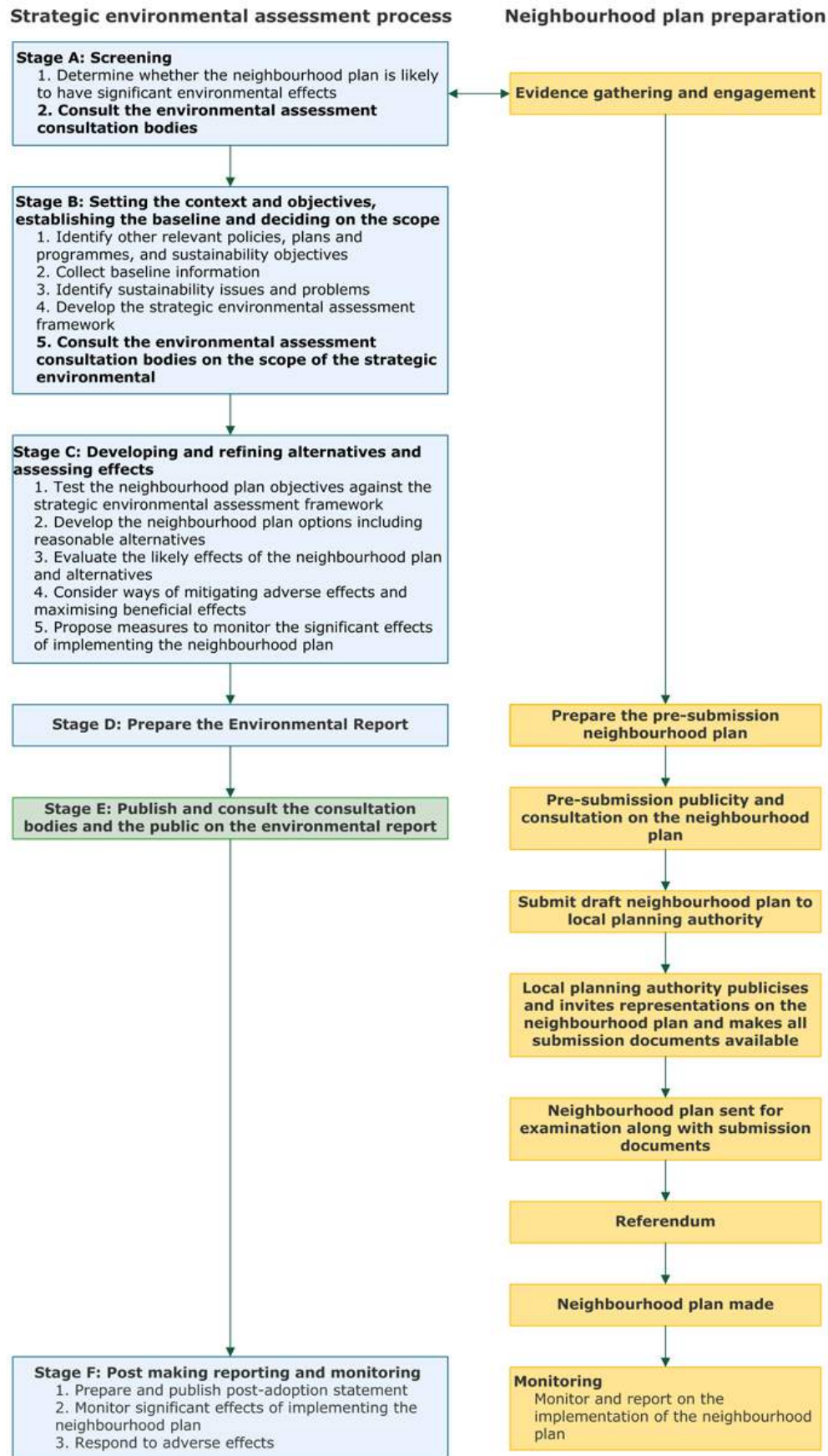


Figure 1.1: The key stages of SEA in neighbourhood plan preparation (DCLG 2015)

1.6 Structure of the NDP

1.6.1 The pre-submission NDP is presented in 4 sections, as listed below:

- Section 1: Introduction;
- Section 2: Evidence Gathering and Interpretation;
- Section 3: Brailes Today; and
- Section 4: Objectives and Policies for Brailes Tomorrow.

1.6.2 Section 4 contains the 16 policies that were subject to assessment through the SEA process, which are presented in **Table 1.1**. They are related to three themes. Namely natural environment, housing and economy.

Table 1.1: List of NDP policies in the pre-submission NDP

Policy Reference	Policy Name
Natural Environment	
NE1	Managing Local Water Environment and Flood Risk
NE2	Designated Local Green Spaces
NE3	Protecting Green Fingers and Corridors
NE4	Maintaining Edge-of-Settlement Views
NE5	Nature Conservation
NE6	Promoting Local Renewable and Low Carbon Energy
NE7	Retaining “Dark Skies”
Housing	
H1	Maintaining Local Character
H2	Managing the Built Up Area Boundary
H3	Meeting Future Housing Needs of SDC Core Strategy
H4	Meeting Local Housing Needs by Gradual Small Developments
H5	Re-using Previously Developed Land (Brownfield) and Buildings
Economy	
E1	Encouraging Sustainable Economic Development
E2	Re-use of Redundant Agricultural Buildings
E3	Improving Access to Communications
E4	More Opportunities for Home-Working

1.7 Meeting the SEA Directive requirements

1.7.1 **Table 1.2** includes the requirements of the SEA Directive and shows where they have been met within the SEA process.

Table 1.2: Meeting the requirements of the SEA Directive

Requirement for Environmental Report	Location
Include an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes.	SEA Scoping Report: Chapter 1 and Chapters 3 to 12 SEA Report: Chapter 1
Include information on the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	SEA Scoping Report: Chapters 3 to 12
Describe the environmental characteristics of areas likely to be significantly affected	SEA Scoping Report: Chapters 3 to 12
Specify any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	SEA Scoping Report: Chapters 3 to 12 (Key Issues boxes)
Consider the environmental protection objectives, established at international, Community or Member State 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.	SEA Scoping Report: Chapters 3 to 12 Scoping Report: Appendix B SEA Report: Chapter 2
Assess 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, and cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	SEA Report: Chapters 4, 6 and 7
Give details of 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.	SEA Report: Chapter 7
Give 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.	SEA Report: Chapters 3, 4 and 5
Include a description of the measures envisaged concerning monitoring.	SEA Report Chapter 8
Include a non-technical summary of the information provided.	SEA Report Non-Technical Summary

1.8 How the NDP SEA has evolved

1.8.1 This report is part of a series of reports that have been prepared to facilitate an iterative and informative approach to SEA. Lepus undertook a screening assessment of the Neighbourhood Plan in June 2017⁶, to determine whether the NDP should be screened into the SEA process. This assessment determined that the NDP had the potential to lead to likely significant effects on the environment because of potential adverse impacts to the local landscape, thus it was screened into the SEA process in accordance with the SEA Directive. Statutory bodies agreed with this conclusion, citing that development in close proximity to the Cotswolds Area of Outstanding Natural Beauty, in addition to the range of historical and cultural assets within the local area, could potentially result in significant adverse effects to the local environment.

Scoping

1.8.2 Preparing a Scoping Report represents Stage A of the SEA process (see **Figure 1.1**). Once screened into the process, the first stage of the SEA was to prepare a Scoping Report to outline the environmental issues in Brailes and use this information to develop a framework against which to assess environmental impacts of the plan.

1.8.3 The Scoping Report also identified relevant plans, policies and programmes (PPPs) relating to environmental issues in Brailes. This also set out a series of objectives for environmental protection and a SEA framework, against which the NDP is to be assessed. This is discussed in more detail in **Chapter 2**.

Reasonable alternatives

1.8.4 The Brailes NDP Steering Group put forward a number of the sites which were assessed for significant environment effects. These sites were assessed and the results sent to the Steering Group for consideration. Details of these assessments are given in **Chapter 4**.

Pre-submission NDP

1.8.5 This report presents an SEA of the pre-submission version of the NDP. This represents Stage C of the SEA process, as described in **Figure 1.1** and also documents Stage B, as described in **Chapter 2**. The pre-submission version of the NDP will be consulted on and any comments will be taken into account going forward. If the comments result in changes to the NDP, the SEA work may need to be re-visited to assess the effects of any changes to the plan.

⁶ Lepus Consulting (2016) Strategic Environmental Assessment of the Brailes & Winderton Neighbourhood Development Plan: SEA Screening Document

1.8.6 Once the NDP has been formally adopted, an SEA Post-Adoption Statement will be prepared, in order to demonstrate how environmental considerations highlighted in the SEA process were taken into consideration during the preparation of the plan. The Post-Adoption Statement will fulfil Stage E of the SEA process (see **Figure 1.1**).

1.9 Relationship with the Stratford-on-Avon District Council Core Strategy

1.9.1 The Core Strategy was adopted on 11th July 2016. Now it has been adopted, this forms the key planning document for Stratford-on-Avon as a whole. The Core Strategy is a high-level document, which will form the basis of other development plans in the area.

1.9.2 If adopted as a DPD, the NDP will sit alongside the Core Strategy as part of the statutory Development Plan. The Development Plan will form the blueprint for future planning decisions in Brailes.

1.9.3 The NDP is complimentary to the Core Strategy and provide more detailed policies, rather than alternative policies that would negate the Core Strategy. The Core Strategy was subject to an integrated Strategic SA, which assessed the plan for significant effects on sustainability. SA assesses the likely implications of a plan on social and economic factors, as well as environmental effects. Mitigation measures were suggested where negative or uncertain impacts were identified.

2 Scoping

2.1 Introduction

2.1.1 The first phase of preparation for the SEA was the scoping stage. This represented Stage A of SEA, according to the DCLG (2015) Guidance on SEA for Neighbourhood Plans (**Figure 1.1**). Scoping is the process of deciding the scope and level of detail of a SEA, including the environmental effects and alternatives to be considered, the assessment methods to be used, and the structure and contents of the SEA Report.

2.1.2 The purpose of the Scoping Report is to set the criteria for assessment (including the SEA Objectives), and establish the baseline data and other information, including a review of relevant PPPs. The scoping process involves an overview of key issues, highlighting areas of potential concern.

2.1.3 The Scoping Report was carried out by Lepus Consulting in July 2017⁷. The Scoping Report was sent to the Environment Agency, Natural England and Historic England for a five week consultation. Responses from these statutory consultees can be seen in **Appendix B**, based on which the SEA Framework and scope of this environmental report were finalised.

2.2 Policies, plans and programmes review

2.2.1 A plan or programme may be influenced in various ways by other plans or programmes, or by external environmental protection objectives such as those laid down in policies or legislation. The SEA process takes advantage of potential synergies and addresses any inconsistencies and constraints.

2.2.2 The Scoping Report presented an analysis of the objectives of the key PPPs (including legislation) that are relevant to the NDP and the SEA assessment process. These were presented by their geographic relevance, from international to local level.

2.3 Baseline data and information

2.3.1 A key part of the scoping process is the collection of baseline data. The purpose of this exercise is to help identify key issues and opportunities facing the area which might be addressed by the NDP, and to provide an evidence base for the assessment.

⁷ Lepus Consulting (2017) Strategic Environmental Assessment of the Brailes & Winderton Neighbourhood Development Plan: Scoping Report

2.3.2 The baseline chapters in the Scoping Report (**Chapters 3 to 12**) provided a review of existing environmental conditions within the plan area and their likely evolution in absence of the NDP. One of the purposes of consultation on the Scoping Report was to seek views on whether the data selected was appropriate.

2.4 The SEA Framework

2.4.1 The purpose of the SEA Framework is to provide a way of ensuring that the NDP considers the environmental needs of Brailes in terms of its environmental effects. It also enables the environmental effects of the NDP policies to be described, analysed and compared.

2.4.2 The SEA Framework consists of environmental objectives, which, where possible, the achievement of which is measurable using indicators. There is no statutory basis for setting objectives but they are a recognised way of considering the environmental effects of a plan and comparing alternatives. The SEA Objectives provide the basis from which effects of the NDP were assessed.

2.4.3 The SEA Objectives were developed through the PPP review, the baseline data collection and the key issues identified for the plan area. The SEA topics identified in Annex I (f) of the SEA Directive⁸ were one of the key determinants when considering the SEA Objectives to be used for appraisal purposes. The SEA Objectives seek to reflect each of these influences to ensure the assessment process is robust and thorough. The SEA Framework is presented in **Appendix A**.

⁸ Biodiversity flora and fauna; Population; Human health; Soil; Water; Air; Climatic factors; Material assets; Cultural heritage (including architectural and archaeological heritage); and Landscape.

3 Methodology

3.1 Approach to assessment

- 3.1.1 The assessment uses geographic information, the SEA Framework and established standards (where available) to help make the assessment decisions transparent and robust.
- 3.1.2 The sites and policies have been assessed against the SEA Framework (see **Appendix A**).
- 3.1.3 To expand on the central focus of each SEA Objective (as they are high-level and potentially open-ended) the SEA Framework includes a series of questions or ‘decision making criteria’. Indicators for these criteria are also included within the SEA Framework. The purpose of the SEA Objectives is to provide a way of ensuring that the proposed plan considers each site on a fair and consistent basis. The 13 SEA objectives are presented in Table 3.1.

Table 3.1: SEA Framework Objectives

Ref	Name	Description
1	Cultural heritage	Protect, enhance and manage sites, features and areas of archaeological, historical and heritage importance.
2	Landscape	Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening distinctiveness and its special qualities.
3	Biodiversity & geodiversity	Protect, enhance and manage the biodiversity and geodiversity.
4	Flooding	Reduce the number of people at risk of flooding.
5	Climate change	Minimise the NDP area’s contribution to climate change and plan for anticipated climatic conditions.
6	Natural resources	Protect and conserve the NDP area’s natural resources.
7	Pollution	Minimise air, noise, soil, light and water pollution.
8	Waste	Reduce waste generation and disposal and achieve sustainable management of waste
9	Transport	Increase the efficiency of transport networks and improve access to sustainable modes.
10	Accessibility	Reduce barriers for those living in rural areas.
11	Housing	Provide environmentally sound and good quality housing for all.
12	Health, safety and wellbeing	Safeguard and improve the safety, health and quality of life in the community.
13	Economy	Develop a dynamic, diverse and knowledge based economy of high value and low impact innovation.

3.1.4 The use of a suite of objectives lends itself to a matrix based assessment where each alternative or approach is assessed against each SEA Objective. It should be noted that the ordering of the SEA Objectives does not infer any prioritisation.

3.2 Appraisal process

3.2.1 The appraisal process has used the SEA Framework, the review of plans, programmes and policies, and the baseline (including various mapped data sources), as presented in the SEA Scoping Report, to assess each option. Assessments have been undertaken using this empirical evidence and, to a lesser extent, expert judgement.

3.2.2 Limitations in terms of the level of detail and confidence of assessment are cited in the explanatory text; the worst case scenario has been assumed in accordance with the precautionary principle⁹.

3.2.3 The first stage of assessment involves answering each of the questions in the SEA Framework in turn with a yes (+), no (-), uncertain (+/-) or negligible / no effect / not applicable (0). The results of this indicate whether the scenario is likely to bring positive, negative or uncertain effects in relation to the SEA Objectives. This information is then used to inform the overall effect of the site on the SEA Objective.

3.2.4 The second stage of assessment considers the level of significance of the effects identified in the first stage (described above). Leading from the likelihood of positive or negative effects, the assessment draws on criteria for determining the likely significance of effects referred to in Article 3(5) of the SEA Directive and presented in Annex II of the Directive (see **Box 3.1**). The majority of identified positive or negative effects can be considered to be significant. Any assessment rated as negligible is not considered to represent a significant effect. The extent of significance is perhaps most helpfully expressed by orders of magnitude.

3.2.5 At a strategic level, it can be difficult to assess significant effects in the absence of widespread data. Instead, orders of magnitude are used, based on geographic significance and impact magnitude. **Table 3.2** illustrates such orders of magnitude for positive and negative effects.

⁹ The Precautionary Principle states that, in the absence of scientific evidence or consensus, the worst case scenario is assumed.

- 3.2.6 Assessments are predominantly in the form of a text narrative that explains the likely impacts of the proposed development or policy on that SEA Objective. This narrative should be used to interpret the impacts of the NDP. To allow for an objective overview of the SEA performance of each proposal in the NDP, a single colour and corresponding score value is assigned to each proposal. These reflect the level of significance of the effect and whether it is positive or negative. Orders of magnitude are not assigned to uncertain effects. A single value from **Table 3.2** is allocated to each SEA Objective (see **Chapters 4, 5 and 6**).
- 3.2.7 When selecting a single value to best represent the sustainability performance of the relevant SEA Objective, the Precautionary Principle is used. This is a worst-case scenario approach.
- 3.2.8 If a positive effect is identified in relation to one question and a negative effect is identified in relation to another question within the same SEA Objective, that Objective will be given an overall negative value.

Table 3.2: Guide to impact significance matrix

Key:	
Likely strong positive effect	++
Likely positive effect	+
Neutral/no effect	0
Likely adverse effect	-
Likely strong adverse effect	--
Uncertain effects	+/-

- 3.2.9 Whilst the orders of magnitude are determined by impact magnitude and geographic significance or sensitivity, the determination of impact takes into consideration the characteristics of the resultant effect as presented in **Box 3.1**.
- 3.2.10 As demonstrated in **Table 3.2**, significance is determined by the sensitivity or geographic scale of the receptor and the impact magnitude. The coloured boxes represent the level of significance of the predicted effect. The text in each of these boxes describes the level of significance, whilst the plus (+) and minus (-) symbols, along with the colours, give a visual representation of this.

- 3.2.11 To understand the overall effect of the site or policy being assessed, the effect identified against each objective needs to be taken into account to gain a balanced outcome that considers the environmental, social and economic aspects of sustainability. A site or policy that is found to have negative effects against certain objectives is not necessarily unsuitable as these negatives must be considered in light of any positive effects that may have been identified. Note too that the impact magnitudes are not intended to be summed. For example, two '+' are not to be considered equal to a single '++'. The scores assigned are a matter of professional judgement considering the baseline data, policy context and other sources of information available to inform the assessment.
- 3.2.12 Geographic scale relates primarily to the level of importance of the receptor or the level at which it is designated (if applicable). Geographic scale may also refer to the physical area of the receptor, or the part of the receptor likely to be affected.
- 3.2.13 Impact magnitude relates to the degree of change the receptor will experience, including the probability, duration, frequency and reversibility of the effects (see **Box 3.1**). The terms used in **Table 3.2** are explained in more detail below.

Box 3.1 Annex II of the SEA Directive

Criteria for determining the likely significance of effects referred to in Article 3(5) of the SEA Directive

The characteristics of plans and programmes, having regard, in particular, to:

- 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 degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
- the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
- environmental problems relevant to the plan or programme; and
- the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).

Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:

- the probability, duration, frequency and reversibility of the effects;
- the cumulative nature of the effects;
- the transboundary nature of the effects;
- the risks to human health or the environment (e.g. due to accidents);

- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- the value and vulnerability of the area likely to be affected due to:
- special natural characteristics or cultural heritage;
- exceeded environmental quality standards or limit values;
- intensive land-use; and
- the effects on areas or landscapes which have a recognised national, Community or international protection status.

3.3 Assumptions, limitations and consistencies within site assessments

3.3.1 There are a number of assumptions and limitations which should be borne in mind when considering the results and conclusions of this assessment. The use of the assumptions and limitations text allow individual site assessments to focus on site specific impacts, and avoid repetition within the individual site assessment text.

3.3.2 This section includes details of the indicators within the SEA Framework which are consistent across all sites. This information has been considered within the assessment for each site, in addition to the site-specific information presented in **Chapter 4**.

3.3.3 The likelihood of effects is assessed based on the best available information, including that provided to us by the client team and information that is publicly available. Every attempt has been made to predict effects as accurately as possible using the available information.

Distances

3.3.4 Distances have been measured from the furthest boundary of the site to the receptor, unless the receptor in question results in an adverse impact (such as cultural assets), in which cases the closest site boundary has been used. These have been measured as the crow flies. Distances to facilities and amenities have been considered sustainable if they are within the maximum recommended distances stated in Barton, Grant and Guise (2010)¹⁰ Shaping Neighbourhoods for local health and global sustainability, which is a commonly used reference point. All distances are approximate. Travel times by public transport have been sourced from Google Maps¹¹.

¹⁰ Barton, Grant and Guise (2010) Shaping Neighbourhoods for local health and global sustainability, Spon Press

¹¹ <https://www.google.co.uk/maps/>

Table 3.3: Sustainable distances to facilities and amenities Barton et al (2010)¹².

Features	Optimal distance	Target distance
Local park/greenspace	400m	600m
Leisure centre	1.5km	2km
General Practitioner's (GP) surgery	800m	1km
Hospital with Accident and Emergency services (A&E)	5km	8km

SEA Objective 1: Cultural Heritage

- 3.3.5 It is assumed that all historic statutory designations, including Listed Buildings and Conservation Areas, will not be lost to development. The effects of a development on the setting of such historic asset designations will depend substantially on design, the details of which being uncertain at this stage.
- 3.3.6 Sites containing, or in close proximity to, areas of archaeological interest may benefit further archaeological assessment to determine the potential adverse effects which may not have been revealed by a desk based assessment.
- 3.3.7 Assessments showing a negative effect on cultural heritage occur where development is likely to affect the setting of the historic or cultural asset, whilst the severity of the effect has been assigned based on the sensitivity of the historic asset in question.
- 3.3.8 It is considered to be unlikely that development at any of the sites will improve the setting of, or access to, cultural assets.

SEA Objective 2: Landscape

- 3.3.9 The sensitivity of the landscape character as presented in the landscape studies conducted by WCC Architects (2016)¹³ have been used to inform assessment as to the significance of any impacts that development may have on the local landscape.
- 3.3.10 A site visit was conducted by Lepus in August 2017 to determine the character of the local landscapes.
- 3.3.11 All proposed sites are within the Cotswolds AONB and thus the local landscape as a whole is sensitive to new developments.

¹² Ibid.

¹³ Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Study

3.3.12 The proportion of development which meets Building for Life Standards¹⁴ is unknown at this stage. These standards set out guidelines for developing better quality and more sustainable homes and neighbourhoods.

SEA Objective 3: Biodiversity and Geodiversity

3.3.13 Site visits did not include ecological investigation or the recording of habitats and species present. Assessments of potential effects on biodiversity are desk-based, using the best available information. The Stratford-on-Avon District Ecological and Geological Assessment (2010)¹⁵ formed a large part of this information.

3.3.14 Without species-specific data for each site, assessment of impacts has concentrated on habitat presence and diversity. Where priority habitats and/or species (according to the Natural Environment and Rural Communities (NERC) Act (2006)¹⁶) are present, appropriate surveys and ecology work will be conducted at the planning application stage to ensure NERC is accorded with.

3.3.15 Development at any of the sites is not anticipated to increase awareness of biodiversity and geodiversity assets.

3.3.16 It is assumed that where sites border hedges, these hedges are likely to be retained.

3.3.17 Development is anticipated to result in the loss of habitat, loss of supporting habitat, and increased recreational disturbances.

SEA Objective 4: Flooding

3.3.18 Soil within the Brailes area is thought to have impeded drainage which is likely to lead to surface water flooding and overland flow¹⁷.

3.3.19 Reference to Flood Zones within site assessments refers to fluvial flood risk. Information for Flood Zones is sourced from the Environment Agency, as seen in **Figure 3.1**. The following descriptions of surface water flood risks were obtained from the PPG¹⁸:

- Flood Zone 1 - land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%)

¹⁴ Design Council (2015) Building for Life 12: The Sign of a Good Place to Live

¹⁵ The Habitat Biodiversity Audit and Warwickshire County Council (2010) Stratford-on-Avon District Ecological and Geological Assessment.

¹⁶ Natural Environment and Rural Communities Act (2006)

<http://www.legislation.gov.uk/ukpga/2006/16/contents>

¹⁷ Cranfield Soil and Agrifood Institute: Soilscales. Available at: <http://www.landis.org.uk/soilscales/>

¹⁸ Department for Communities and Local Government (2015) Planning Practice Guidance. Paragraph: 065 Reference ID: 7-065-20140306

- Flood Zone 2 - land assessed as having between a 1 in 100 and 1 in 1,000 annual probability of river flooding (1% – 0.1%), or between a 1 in 200 and 1 in 1,000 annual probability of sea flooding (0.5% – 0.1%) in any year
- Flood Zone 3 - land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%), or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year

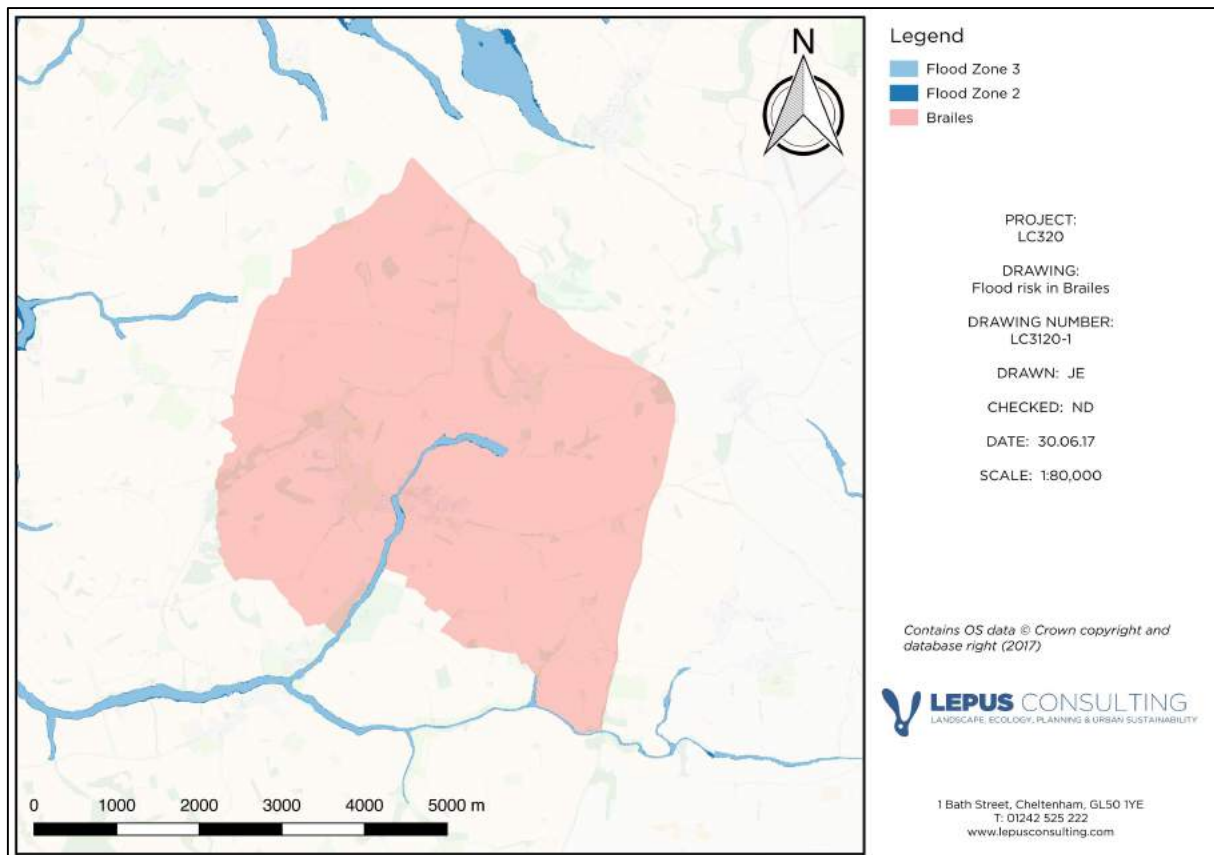


Figure 3.1: Fluvial flooding risk, shown by extent of Flood Zones 2 and 3 in Brailes (Environment Agency, 2016)

3.3.20 Information for surface water (pluvial) flood risk is sourced from the Environment Agency, as seen in **Figure 3.2**. The following descriptions of surface water flood risks were obtained from the Environment Agency¹⁹:

- High risk means that each year, there is an estimated chance of flooding of greater than 1 in 30 (3.3%).
- Medium risk means that each year, there is an estimated chance of flooding of between 1 in 30 (3.3%) and 1 in 100 (1%).
- Low risk means that each year, there is an estimated chance of flooding of between 1 in 100 (1%) and 1 in 1000 (0.1%).
- Very Low risk means that each year, there is an estimated chance of flooding of less than 1 in 1000 (0.1%).

¹⁹ Environment Agency (2013) Flood Map for Planning. Available at: <https://flood-map-for-planning.service.gov.uk/>

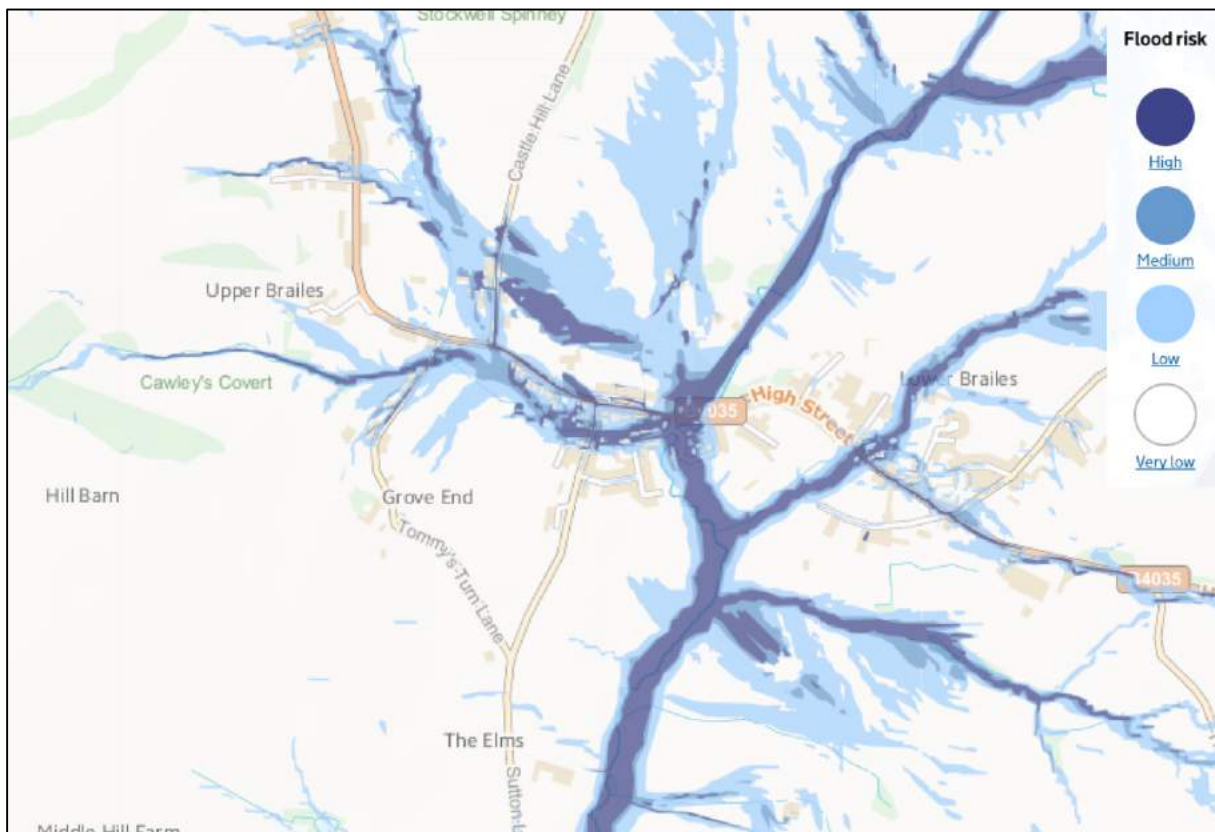


Figure 3.2: Risk of flooding from surface water (Environment Agency, 2016)

- 3.3.21 The risk of groundwater flooding is unknown for all sites.
- 3.3.22 A Sequential Flood Risk Assessment and Exception Test is required prior to development to better establish the risk of flooding at all sites.

SEA Objective 5: Climate Change

- 3.3.23 Factors considered for the climate change mitigation assessment of each site include the level of anticipated personal car use for prospective residents, the anticipated net loss or gain of GI (for its natural air filtering and carbon sink qualities), and overall scale of development.
- 3.3.24 It is unknown whether development at any of the sites will help to raise awareness of climate change mitigation.
- 3.3.25 The thermal efficiency of new dwellings, amount of greenspace within developments and use of sustainable drainage systems (SuDS) is unknown in the absence of more detailed design proposals.
- 3.3.26 The proportion of electricity that will be renewably sourced is likely to be the same for all sites. The target for the Stratford-upon-Avon region by 2021 is 31.6-48.2%²⁰, however it is unknown whether this will be achieved, or whether development will help to achieve this.

²⁰ Camco (2010) Renewable and Low Carbon Energy Resource Assessment and Feasibility Study.

- 3.3.27 The ongoing occupation of six dwellings is likely to result in greater GHG emissions than the current use of any of the sites, and will therefore increase the GHG emission of the Brailes area.
- 3.3.28 Development at any site will result in the loss of a small amount of GI, however the small scale of development means this impact is not likely to be significant.
- 3.3.29 Residents at all proposed sites are anticipated to have a high personal car use (see SEA Objective 9) which is likely to further contribute to the increased GHG emissions of the area following development.

SEA Objective 6: Natural Resources

- 3.3.30 All sites are thought to have 'slowly permeable, seasonally wet, slightly acid but base-rich loamy and clayey soil' with low carbon and moderate fertility²¹.
- 3.3.31 The ALC system forms part of the planning system in England and Wales. It classifies agricultural land into five categories according to versatility and suitability for growing crops. The top three grades, Grade 1, 2 and 3a, are referred to as 'Best and Most Versatile' land. Grades 4 and 5 are described as poor quality agricultural land and very poor quality agricultural land. All sites are situated on land with an ALC of Grade 3. It is not known whether this is Grade 3a, which is the best and most versatile agricultural land, or 3b, which is not. In accordance with the Precautionary Principle it has been assumed that they are within Grade 3a.
- 3.3.32 None of the sites assessed lie within a mineral safeguarding area²².
- 3.3.33 It is assumed that development on previously developed land (PDL) (brownfield) is preferable, provided that it is not of high environmental value. This is in accordance with the core planning principles of the NPPF²³. There is no PDL at the site unless otherwise stated.

²¹ Cranfield Soil and Agrifood Institute: Soilscales. Available at: <http://www.landis.org.uk/soilscales/>

²² British Geological Survey (2009) Mineral Safeguarding Areas for Warwickshire

²³ Department for Communities and Local Government (2012) National Planning Policy Framework. Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

SEA Objective 7: Pollution

- 3.3.34 There are no pollution events, historic landfill or Air Quality Management Areas (AQMAs) within or in close proximity to any proposed sites. The fraction of deaths attributable to particulate air pollution in Warwickshire is 4.7%, equal to the national average²⁴.
- 3.3.35 Minor impacts to air pollution may be seen during construction and from small increases in traffic movements at any proposed site, these are deemed not significant at the scale of development proposed. A small increase in light and noise pollution is also likely from the construction and occupation of new dwellings at all sites.
- 3.3.36 Existing residents are thought to rely on high personal car use, however traffic and congestion levels in the area is not currently known.

SEA Objective 8: Waste

- 3.3.37 Development is not expected to include waste separation or recycling facilities, with the nearest facilities of this kind considered to be approximately 6.5km west in Shipston-on-Stour.
- 3.3.38 The extent to which recycled materials will be used within construction is currently unknown.
- 3.3.39 As all sites are proposed for six dwellings or less, the increase in the amount of waste generated in the area not anticipated to be significant.

SEA Objective 9: Transport

- 3.3.40 There is an assumption that the majority of residents moving into new residential developments will own a car or other private vehicle. There is an assumption that car use is likely to be lower if local services and amenities are close enough to be accessible by foot or if there are good links to sustainable modes of transport, including the PRow network and bus network.
- 3.3.41 Access to frequent public transport services is limited from Brailes. Infrequent bus services operate from several stops on High St, serving Shipston-on-Stour, Stratford-upon-Avon, Banbury Town Centre and Whichford. Although some sites are situated in close proximity to bus stops, the low frequency of services means that reliance on personal car use remains likely.
- 3.3.42 The nearest railway station is Moreton-in-Marsh approximately 12km to the south west.

²⁴ Public Health England (2017) Public Health Outcomes

- 3.3.43 The nearest amenities and services are found within Shipston-on-Stour. The journey from Brailes to Shipston-on-Stour is approximately 23 minutes by public transport via bus, with small variations expected between individual sites.
- 3.3.44 The nearest primary school is Brailes CofE Primary School, within 1km of all proposed sites. The nearest secondary school (Shipston High School), is found within Shipston-on-Stour.
- 3.3.45 Prospective residents of any site are largely expected to work from home or commute to surrounding areas as, due to the lack of local businesses and employers, employment opportunities are thought to be fairly limited within Brailes.
- 3.3.46 Health services are also outside of sustainable distances from all sites and are likely to be accessed by car by prospective residents (see SEA Objective 12).
- 3.3.47 Given the aforementioned poor access to public transport and long distance to amenities and services, existing and prospective residents of Brailes, and therefore all of the sites assessed, are likely to rely relatively heavily on personal car use.

SEA Objective 10: Accessibility

- 3.3.48 All bus services from Brailes are currently infrequent, with services available less than once every hour.
- 3.3.49 All sites are anticipated to provide two affordable dwellings, resulting in a small amount of new affordable housing in rural areas, improving the accessibility of rural areas.
- 3.3.50 It is anticipated that dwellings at all sites will require access via new roads and/or drives. It is unclear where these will be therefore the impact on accessibility is unknown.

SEA Objective 11: Housing

- 3.3.51 All sites are proposed for six dwellings or less. For sites proposed for six dwellings, two dwellings are anticipated to be affordable (subsidised).
- 3.3.52 The proportion of new dwellings expected to meet the building specification guidance in the Code for Sustainable Homes is currently unknown.
- 3.3.53 The extent to which development contributes to local distinctiveness and character is dependent on more detailed design proposals and the existing built form surrounding each site.

SEA Objective 12: Health, Safety and Wellbeing

- 3.3.54 For all sites, the nearest GP (Shipston Medical Centre), hospital (Ellen Badger Hospital) and leisure centre (Shipston Leisure Centre) are found in Shipston-on-Stour, a journey of 6.6km taking approximately 23 minutes by bus.
- 3.3.55 The nearest available A&E services are found at Horton General Hospital in Banbury, a journey of 19.8km taking approximately 55 minutes by bus.
- 3.3.56 It is currently unknown whether development at any of the sites will provide any new greenspaces or sports facilities, or impact upon crime, deprivation and life expectancy within the area.
- 3.3.57 The extent to which the needs of the elderly are met within the new developments are also unknown without more detailed design proposals.
- 3.3.58 Access to greenspace, shown to be beneficial for physical and mental health²⁵, is thought to be good at all sites.

SEA Objective 13: Economy

- 3.3.59 It is not expected that employment space will be included within development at any of the proposed sites.

²⁵ Baron and Pretty (2010) What is the Best Dose of Nature and Green Exercise for Improving Mental Health? A Multi-Study Analysis, Environmental Science Technology, 44 (10), pp 3947-3955.

4 Assessment Findings: Sites

4.1 Introduction

4.1.1 The SEA Directive requires that the SEA process considers:

'Reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme' and gives 'an outline of the reasons for selecting the alternatives dealt with' (Article 5.1 and Annex I (h)).

4.1.2 In the UK, reasonable alternatives are commonly referred to as 'options'. The assessment of reasonable alternatives refers to the plan making process stage of exploring policy options.

4.1.3 The role of SEA is to inform the plan making group in their selection and assessment of options. The findings of the SEA can help with refining and further developing these options in an iterative and on-going way. The SEA findings do not form the sole basis for decision-making; other studies, the feasibility of the option and consultation feedback will also contribute to the decision.

4.1.4 The results of an SEA may reveal that there is no single, best performing option. Where there is no obvious discernible difference at a strategic scale, the SEA process will record this as an outcome for that particular stage of the assessment process.

4.1.5 In the case of a development plan document not fully complying with the NPPF and SEA Regulations, the planning examiner is likely to recommend the plan for withdrawal or suspension. For example, a legal challenge was lodged against Forest Heath District Council in 2011, regarding their proposed Core Strategy. The High Court ruled that the Core Strategy did not give clear reasoning as to why alternative policies that were rejected were deemed unreasonable²⁶. This ruling should guide current best practice and ensure that the reasons for selecting or rejecting alternatives are explained, and that the public should have an effective opportunity to comment on appraisal of alternatives. The SEA report accompanying the plan must refer to, summarise or repeat the reasons that had been given in earlier iterations of the plan and SEA, and these must still be valid.

²⁶ Forest Heath Core Strategy High Court Order (2011) Available at: https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/B10-FHDC-Core-Strategy-High-Court-Order-04-May-2011.pdf

4.1.6 Similarly, the planning examiner raised concerns regarding the Bath and North East Somerset Core Strategy in 2012²⁷. These concerns were centred on the fact that there was weak justification for selecting the preferred policies, particularly as some of the preferred options did not appear to meet the needs identified in the SA/SEA.

4.1.7 These cases demonstrate the need for transparency in the plan-making process, including taking the SEA findings into account and drawing on the SEA to justify the preferred options selected.

4.2 Identifying reasonable alternatives

4.2.1 The PPG²⁸ states that the environmental report accompanying a neighbourhood plan should 'outline the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives'.

4.3 Reasonable alternatives: sites

4.3.1 The PPG notes that 'Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable'²⁹.

4.3.2 It also states that 'Proposals in a draft neighbourhood plan, and the reasonable alternatives should be assessed to identify the likely significant effects of the available options. Forecasting and evaluation of the significant effects should help to develop and refine the proposals in the neighbourhood plan'³⁰.

4.3.3 The remainder of this chapter sets out the SEA of reasonable alternative sites. The results for each site can be found in a single line matrix. The values in the matrix are contextual rather than absolute. Tables have been prepared which include assessment narrative which explains the sustainability issues in more detail. Where there is no narrative text given for an SEA Objective, the assessment has been made based on universal assumptions and consistencies presented in **Chapter 3**.

4.3.4 The 17 sites, shown in **Figure 4.1**, have been assessed as per the methodology presented in **Chapter 3**.

²⁷Bath and North East Somerset Core Strategy High Court Judgment (2012) <https://www.n-somerset.gov.uk/wp-content/uploads/2015/12/high-court-judgement.pdf>

²⁸ Department for Communities and Local Government (2015) Planning Practice Guidance Paragraph: 018 Reference ID: 11-018-20140306

²⁹ Ibid.

³⁰ Department for Communities and Local Government (2015) Planning Practice Guidance. Paragraph: 037 Reference ID: 11-037-20150209

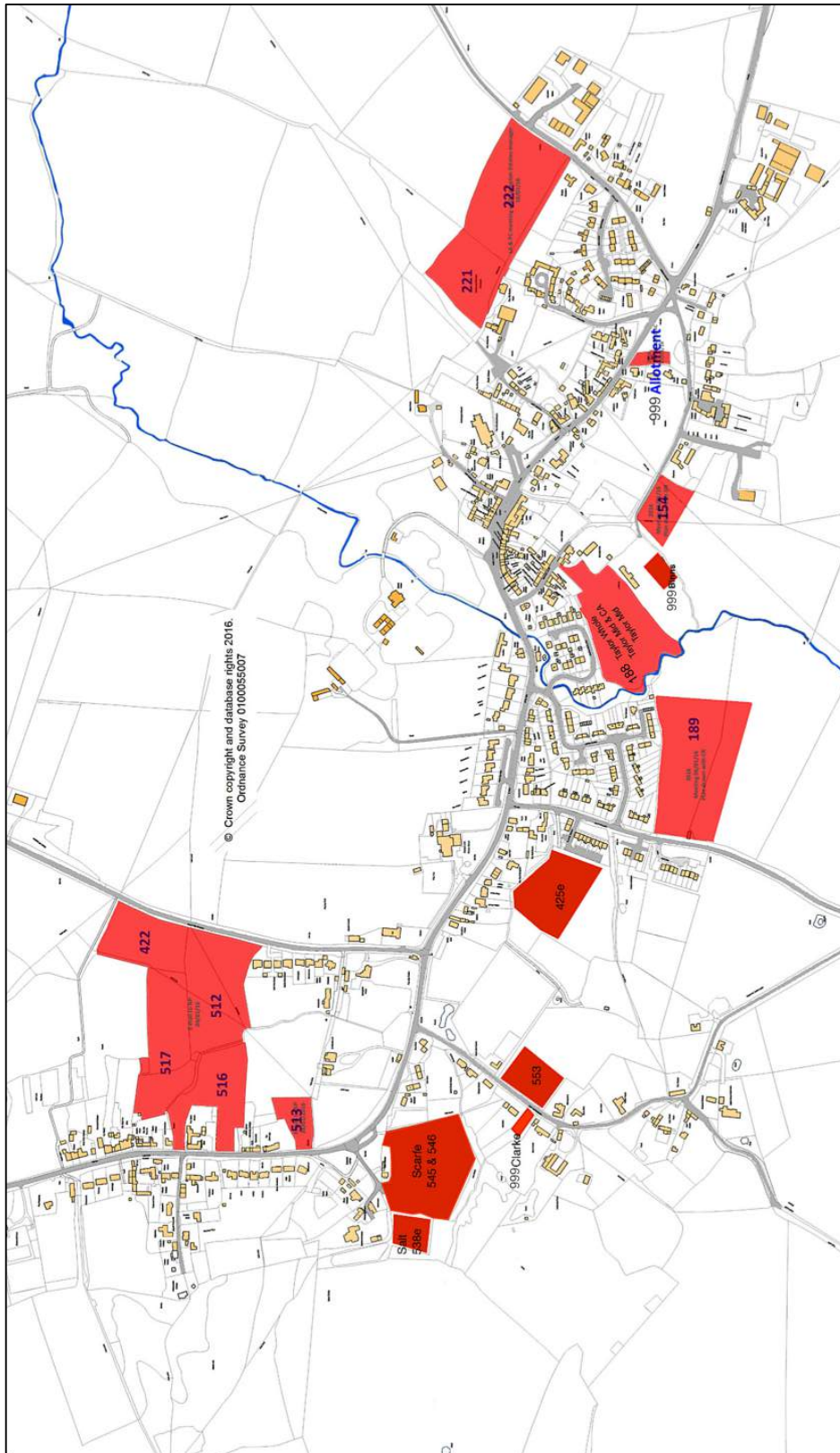


Figure 4.1: Map of 17 sites³¹.

³¹ Brailes NDP Steering Group Call for Sites. Available at: <http://www.brailesparishcouncil.co.uk/npwp/wp-content/uploads/2016/10/Call-for-Sites-updated-Ver-2-11-Oct-2016.jpg>

4.4 422 Manley Castle Hill Lane

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
--	--	O	+	-	-	O	O	--	--	+	-	-

4.4.1 422 Manley Castle Hill Lane is a site west of Castle Hill Lane, east of Upper Brailes. The site is currently used for agriculture with linear scrub at the perimeter.

SEA1	<p>Brailes' only SM, 'Castle Hill', is found approximately 135m to the north of the site. Due to the existing topography, Castle Hill is clearly visible from all areas of the site. It is possible that buried archaeological deposits relating to both the construction of the castle and the activities of its inhabitants will survive within the immediate area, potentially including this site. Construction may, therefore, adversely affect the setting and archaeological remnants of this SM.</p>
SEA2	<p>This site has a gently sloping topography down from Castle Hill to the north, forming part of the lower slopes of a small stream valley between Brailes Hill and Castle Hill³². The site is situated away from the existing built form on Castle Hill Lane. Due to the positive contribution that the surrounding fields make to the landscape as a whole, in addition to the high tranquillity of the area, a recent landscape study suggests this site has a high sensitivity to housing development³³. It is currently managed as arable land with linear scrub at the perimeter. The Cotswolds AONB Management Plan³⁴ indicates that '<i>archaeological sites and monuments and their settings and remnant historic landscapes</i>' are principle elements of the AONB landscape character. It is also indicated that changes to land use in relation to agriculture may have a negative impact on landscape character. Therefore, development at this site and the potential adverse impact on the setting of 'Castle Hill' SM would not be in-keeping with this management plan. Further to this, guidelines for 'Escarment Outliers - Castle Hill' suggest this is a distinctive, highly visible landscape which is highly sensitive to change³⁵. Within the Brailes Village Design Statement (1998)³⁶ Castle Hill is suggested to provide '<i>wonderful views into the village</i>' which may be adversely affected by development at this site.</p>

³² Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Study

³³ Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Study

³⁴ Cotswolds AONB Management Plan 2013-2018 (2013)

³⁵ Cotswolds AONB Landscape Strategy and Guidelines (2016) LCT1 'Escarment Outliers'

³⁶ Brailes Village Design Statement (1998)

SEA3	The site is currently in agricultural use and is therefore thought to have lower biodiversity value than the surrounding areas and has low habitat distinctiveness ³⁷ . The perimeter of the site is linear scrub with moderate woodland connectivity. This may be host to greater biodiversity but is unlikely to be affected by development at the scale proposed. The area surrounding Castle Hill, 130m north of the site, is a potential Local Wildlife Site (LWS) and is recommended for further survey ³⁸ . Development is not anticipated to adversely affect biodiversity here, but the sensitivity of the area should be considered if development is to occur.
SEA4	This site is within Flood Zone 1 and is therefore at the lowest risk of fluvial flooding. There is a very low risk of surface water flooding at this location.
SEA6	The land is currently in use for agricultural purposes, therefore development is likely to remove some of the land available for this use. Development at this site would not be considered an efficient use of the local area's natural resources.
SEA9	The PRow network around the site is good, with footpaths adjacent to the north, south and west which are likely to encourage walking by prospective residents. The nearest bus stop is approximately 340m west of the site on the B4035.
SEA12	The PRow network around the site facilitates good access to the surrounding countryside via walking or running. Playing fields are situated south east across Castle Hill Lane, offering proximal public open space for prospective residents. Allotments are also situated 280m north west of the site, promoting a healthy and sustainable lifestyle.
SEA13	Development at this site is anticipated to involve the loss of agricultural land which may adversely impact the local economy.

³⁷ The Habitat Biodiversity Audit and Warwickshire County Council (2010) Stratford-on-Avon District Ecological and Geological Assessment.

³⁸ The Habitat Biodiversity Audit and Warwickshire County Council (2010) Stratford-on-Avon District Ecological and Geological Assessment.

4.5 512 Manley Castle Hill Lane

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
--	--	-	--	-	-	○	○	--	--	+	-	○

4.5.1 512 Manley Castle Hill Lane is a site west of Castle Hill Lane, south east of Upper Brailes. The site is north of the existing built form on Castle Hill Lane and is currently grassland with trees, intact hedge and linear scrub at the perimeter. The site is occasionally used for car parking for events such as the Brailes Show.

SEA1	A medieval earthwork bank is found at the south and east boundaries of the site. 'Sunnyside', a Grade II Listed Building, is situated approximately 130m south of the site but is partially screened by foliage and the existing dwellings to the east of Castle Hill Lane. 'Castle Hill' SM is found approximately 300m to the north of the site. The site is clearly visible from Castle Hill, therefore the setting of this SM may be adversely affected by development.
SEA2	This site has a flat topography but is situated at the lower slopes of a small stream valley between Brailes Hill and Castle Hill ³⁹ . The site is thought to be poor semi-improved grassland ⁴⁰ . Due to the positive contribution that the surrounding fields make to the landscape as a whole, in addition to the high tranquillity of the area and presence of a footpath, a recent landscape study suggests this site has a high sensitivity to housing development ⁴¹ . Guidelines for 'Escarpment Outliers - Castle Hill' suggest this is a distinctive, highly visible landscape which is highly sensitive to change ⁴² . The Cotswolds AONB Management Plan ⁴³ indicates that ' <i>archaeological sites and monuments and their settings and remnant historic landscapes</i> ' are principle elements of the AONB landscape character. Development at this site, which is within the setting of Castle Hill, could adversely affect the landscape character of the area. Within the Brailes Village Design Statement (1998) ⁴⁴ Castle Hill is suggested to provide ' <i>wonderful views into the village</i> ' which may be adversely affected by development at this site.

³⁹ Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Study

⁴⁰ The Habitat Biodiversity Audit and Warwickshire County Council (2010) Stratford-on-Avon District Ecological and Geological Assessment

⁴¹ Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Study

⁴² Cotswolds AONB Landscape Strategy and Guidelines (2016) LCT1 'Escarpment Outliers'

⁴³ Cotswolds AONB Management Plan 2013-2018 (2013)

⁴⁴ Brailes Village Design Statement (1998)

SEA3	Habitats present at the site include poor semi-improved grassland, an area of wet marshy grassland in the west, linear scrub and trees at the perimeter ⁴⁵ . A potential LWS is adjacent to the north west with further marshy grassland. The perimeter to the east and wooded area to the south of the site have moderate woodland connectivity, disturbance to these areas should be avoided.
SEA4	This site is within Flood Zone 1 and is therefore at the lowest risk of fluvial flooding. Risk from surface water flooding is medium in the most part, with small areas at high risk.
SEA6	Land at this site is not currently in use for any specific purpose, but is entirely undeveloped and is thought to have moderate levels of biodiversity. Development at this site, therefore, is not considered to be an efficient use of land.
SEA9	The PRow network around the site is very good, with footpaths running through and adjacent to the site which are likely to encourage walking by prospective residents. The nearest bus stop is approximately 350m west of the site.
SEA12	The PRow network around the site facilitates good access to the surrounding countryside via walking or running. Playing fields are situated east across Castle Hill Lane, offering proximal public open space for prospective residents. Allotments are also situated 340m north west of the site, promoting a healthy and sustainable lifestyle.
SEA13	Development is not anticipated to involve the loss of any employment land, therefore it is likely that the local economy will be unaffected.

⁴⁵ The Habitat Biodiversity Audit and Warwickshire County Council (2010) Stratford-on-Avon District Ecological and Geological Assessment

4.6 516 Manley Castle Hill Lane

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
--	--	-	-	-	-	O	O	--	--	+	-	O

4.6.1 516 Manley Castle Hill Lane is a site east of the B4035, south of Upper Brailes. The site is a field of improved grassland with linear scrub and trees at the perimeter. Within the field but not within the site boundary is a settlement of existing dwellings. A recent planning application was refused for a single dwelling in the north west area of the site adjacent to the B4035.

SEA1	Several medieval earthwork banks are present within the site and it is thought that a medieval settlement was also present. 'Stone Croft' and 'Hillside House', both Grade II Listed Buildings, are found less than 50m from the site perimeter. The setting of at least one of these cultural assets is anticipated to be adversely affected by development at this site. 'Castle Hill' SM is found approximately 300m to the north of the site. The site is clearly visible from Castle Hill, therefore the setting of this SM may be adversely affected by development.
SEA2	This site has a gently sloping topography down towards the B4035 forming part of the lower slopes of a small stream valley between Brailes Hill and Castle Hill ⁴⁶ . This site is predominantly poor semi-improved grassland. Due to the positive contribution that the surrounding fields make to the landscape as a whole, in addition to the high tranquillity of the area, a recent landscape study suggests this site has a high sensitivity to housing development ⁴⁷ . Planning permission was refused for a single dwelling in the north west area of the site adjacent to the B4035, thought to be due to the landscape sensitivity of this site. Further to this, guidelines for 'Escarpment Outliers - Castle Hill' suggest this is a distinctive, highly visible landscape which is highly sensitive to change ⁴⁸ . Within the Brailes Village Design Statement (1998) ⁴⁹ Castle Hill is suggested to provide ' <i>wonderful views into the village</i> ' which may be adversely affected by development at this site.
SEA3	Habitats present at this site include poor semi-improved grassland, an area of wet marshy grassland in the east and linear scrub at the perimeter. Adjacent to the north is a potential LWS associated with the stream and dense vegetation corridors, this habitat could be disturbed through development at the site.

⁴⁶ Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Study

⁴⁷ Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Study

⁴⁸ Cotswolds AONB Landscape Strategy and Guidelines (2016) LCT1 'Escarpment Outliers'

⁴⁹ Brailes Village Design Statement (1998)

SEA4	This site is within Flood Zone 1 and is therefore at the lowest risk of fluvial flooding. Risk from surface water flooding is low to medium at this location.
SEA6	Land at this site is not currently in use for any specific purpose, but is entirely undeveloped greenfield and is thought to have moderate levels of biodiversity. Development at this site, therefore, is not considered to be an efficient use of land.
SEA9	The PRow network around the site is good, with a footpath adjacent to the site which is likely to encourage walking by prospective residents. The nearest bus stop is found on the B4035, 230m west of the site.
SEA12	The PRow network around the site facilitates good access to the surrounding countryside via walking or running. Playing fields are situated approximately 300m east across Castle Hill Lane, offering proximal public open space for prospective residents. Allotments are also situated 250m north of the site, promoting a healthy and sustainable lifestyle.
SEA13	Development is not anticipated to involve the loss of any employment land, therefore it is likely that the local economy will be unaffected.

4.7 517 Manley Castle Hill Lane

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
--	--	--	--	-	-	O	O	--	--	+	-	O

4.7.1 517 Manley Castle Hill Lane is a site between the B4035 and Castle Hill Lane, south east of Upper Brailes. The site is a field of improved grassland with a small stream running through the centre and linear scrub with trees at the perimeter.

SEA1	A medieval earthwork bank and former medieval settlement are found in the east of the site. Dependent on where the development occurs within this site, it could adversely affect the setting of 'The Gate Inn', a Grade II Listed Building found less than 20m from the site perimeter in the west. 'Castle Hill' SM is found approximately 250m to the north of the site. The site is clearly visible from Castle Hill, therefore the setting of this SM may be adversely affected by development.
SEA2	This site has a gently sloping topography down from Castle Hill to the north, with land either side of the small stream which forms a gentle valley between Brailes Hill and Castle Hill. This site comprises improved grassland. Due to the positive contribution that the surrounding fields make to the landscape as a whole, in addition to the high tranquillity of the area, a recent landscape study suggests this site has a high sensitivity to housing development ⁵⁰ . The majority of the site, apart from the western area towards the B4035, is situated away from built form. Therefore, development may be out of place within the surrounding landscape. Development could adversely affect the setting of 'Castle Hill' SM and the footpath which runs through the eastern area of the site. Potential adverse effects to the dense vegetation along the stream corridors may also have a negative impact on the landscape character of the area. Further to this, guidelines for 'Escarpment Outliers - Castle Hill' suggest this is a distinctive, highly visible landscape which is highly sensitive to change ⁵¹ . Within the Brailes Village Design Statement (1998) ⁵² Castle Hill is suggested to provide ' <i>wonderful views into the village</i> ' which may be adversely affected by development at this site.
SEA3	Habitats present at this site include improved grassland, semi-improved neutral grassland and a stream with dense vegetation corridors. The east of the site is thought to have relatively high biodiversity value and is a potential LWS site due to the species which are likely to be associated with the stream and surrounding vegetation. Development may adversely impact biodiversity in these areas.

⁵⁰ Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Study

⁵¹ Cotswolds AONB Landscape Strategy and Guidelines (2016) LCT1 'Escarpment Outliers'

⁵² Brailes Village Design Statement (1998)

SEA4	This site is within Flood Zone 1 and is therefore at the lowest risk of fluvial flooding. Risk from surface water flooding is medium to high at this location.
SEA6	Land at this site is not currently in use for any specific purpose, but is entirely undeveloped greenfield and is thought to have relatively high levels of biodiversity. Development at this site, therefore, is not considered to be an efficient use of land.
SEA9	The PRow network around the site is very good, with footpaths running through and adjacent to the site which are likely to encourage walking by prospective residents. The nearest bus stop is found on the B4035 approximately 20m west of the site.
SEA12	The PRow network around the site facilitates good access to the surrounding countryside via walking or running. Playing fields are situated approximately 320m east across Castle Hill Lane, offering proximal public open space for prospective residents. Allotments are also situated north west of the site, promoting a healthy and sustainable lifestyle.
SEA13	Development is not anticipated to involve the loss of any employment land, therefore it is likely that the local economy will be unaffected.

4.8 513 Pogmore's

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
-	--	--	+	-	-	O	O	--	--	+	-	O

4.8.1 513 Pogmore's is a site east of the B4035, south of Upper Brailes. The site is an area of woodland with linear scrub, with trees and hedge at the perimeter.

SEA1	The 'Old Forge 'and 'Sunnyside' Grade II Listed Buildings are all within 200m of the site. The setting of at least one of these cultural assets is anticipated to be adversely affected by development at this site. Medieval earthworks and part of a former medieval settlement are also thought to be present at this site.
SEA2	This site comprises woodland with a flat topography and is thought to have a high sensitivity to housing development ⁵³ . The site is situated a small distance from existing built form which may result in development adversely affecting the landscape character of the area. The Cotswolds AONB Management Plan ⁵⁴ states that woodland is a principal element that contributes to the landscape character of the area. A footpath is found adjacent to the north of the site which further increases sensitivity to development.
SEA3	The main habitat present at the site is woodland, with hedges at the perimeter. The landscape sensitivity study ⁵⁵ notes potentially high biodiversity value at this site in comparison to surrounding areas, with sightings of a red kite in this area. Development, therefore, is anticipated to adversely affect biodiversity at this location.
SEA4	This site is within Flood Zone 1 and is therefore at the lowest risk of fluvial flooding. Risk from surface water flooding is very low at this location.
SEA6	Land at this site is not currently in use for any specific purpose, but is entirely undeveloped woodland which potentially has relatively high biodiversity value. Development at this location is, therefore, not considered to be an efficient use of land.
SEA9	The PRoW network around the site is very good, with a footpath running adjacent to the site which is likely to encourage walking by prospective residents. The nearest bus stop is found on the B4035 approximately 270m north of the site.

⁵³ Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Study

⁵⁴ Cotswolds AONB Management Plan 2013-2018 (2013)

⁵⁵ Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Study

SEA12	The PRow network around the site facilitates good access to the surrounding countryside via walking or running. Playing fields are situated approximately 300m east offering proximal public open space for prospective residents. Allotments are also situated north of the site, promoting a healthy and sustainable lifestyle.
SEA13	Development is not anticipated to involve the loss of any employment land, therefore it is likely that the local economy will be unaffected.

4.9 538e Salt

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
-	--	-	+	-	-	O	O	--	--	+	-	O

4.9.1 538e Salt is a site south west of the B4035, south of Upper Brailes. The site is currently poor semi-improved grassland, managed as a small paddock with linear scrub at the perimeter.

SEA1	'Sunnyview and Cottage to Left', a Grade II Listed Building, is situated less than 50m from the site perimeter with no substantial screening present. Development at the site is likely to adversely affect the setting of this cultural asset. This site is also situated within a former medieval settlement.
SEA2	This site has a gently sloping topography down from Brailes Hill to the south west and comprises poor semi-improved grassland. The site is set amongst existing built form to the north and north east, partially separated by trees. To the south and west are areas of coniferous semi-natural woodland. A public footpath is found to the north of the site, the views of the site from this path are partially screened by foliage but may still be adversely affected by development. This site is thought to have high sensitivity to housing development in the WCC Focused Landscape Study ⁵⁶ .
SEA3	The main habitat present at the site is poor semi-improved grassland. Coniferous semi-natural woodland, found adjacent to the west and south site boundaries, has the potential to have relatively high biodiversity value, especially when managed ⁵⁷ . Development is unlikely to significantly affect these areas although these should be carefully considered during design and construction.
SEA4	This site is within Flood Zone 1 and is therefore at the lowest risk of fluvial flooding. Risk from surface water flooding is low at this location.
SEA6	Land at the site is entirely undeveloped and is thought to currently be used as a paddock. Development at this site, therefore, is not considered to be an efficient use of land.
SEA9	The PRow network around the site is good, with a footpath running adjacent to the site which is likely to encourage walking by prospective residents. The nearest bus stop is found on the B4035 approximately 450m north of the site.

⁵⁶ Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Study

⁵⁷ Biodiversity Scotland (2016) Managing Coniferous Woodland

SEA12	The PRow network around the site facilitates good access to the surrounding countryside via walking or running. Playing fields are situated approximately 450m east offering proximal public open space for prospective residents. Allotments are also situated approximately 510m north of the site, promoting a healthy and sustainable lifestyle.
SEA13	Development is not anticipated to involve the loss of any employment land, therefore it is likely that the local economy will be unaffected.

4.10 545 and 546 Scarfe

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
-	--	-	+	-	-	O	O	--	--	+	-	O

4.10.1 545 and 546 Scarfe is a site south west of the B4035, south of Upper Brailes. The site is currently improved grassland, managed as a small paddock with fencing and woodland at the perimeter.

SEA1	'Sunnyview and Cottage to Left', a Grade II Listed Building, is situated less than 50m from the site perimeter with partial screening from foliage and the Old Chapel. Development at the site is likely to adversely affect the setting of this cultural asset. This site is also situated within a former medieval settlement, with extensive medieval earthwork banks also present.
SEA2	This site has a mostly flat topography and comprises improved grassland and small areas of woodland. The site has existing built form to north, where Old Chapel and associated buildings are situated. Public footpaths run adjacent to the north and east of the site, the expansive views from these are likely to be adversely affected by development at this site. This site is thought to have high sensitivity to housing development in the WCC Focused Landscape Study ⁵⁸ .
SEA3	The main habitat present at the site is improved grassland. A pocket of coniferous semi-natural woodland is found in the south of the site which has the potential to have relatively high biodiversity value, especially when managed ⁵⁹ . A stream is situated to the south of the site, surrounded by broad-leaved semi-natural woodland is also likely to have relatively high biodiversity value. Development is likely to adversely affect these valued habitats.
SEA4	This site is within Flood Zone 1 and is therefore at the lowest risk of fluvial flooding. Risk from surface water flooding is low at this location.
SEA6	Land at the site is entirely undeveloped and is thought to currently be used as a paddock. Development at this site, therefore, is not considered to be an efficient use of land.
SEA9	The PRow network around the site is good, with a footpath running adjacent to the site which is likely to encourage walking by prospective residents. The nearest bus stop is found on the B4035 approximately 540m north of the site.

⁵⁸ Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Study

⁵⁹ Biodiversity Scotland (2016) Managing Coniferous Woodland

SEA12	The PRow network around the site facilitates good access to the surrounding countryside via walking or running. Playing fields are situated approximately 420m east offering proximal public open space for prospective residents. Allotments are also situated approximately 550m north of the site, promoting a healthy and sustainable lifestyle.
SEA13	Development is not anticipated to involve the loss of any employment land, therefore it is likely that the local economy will be unaffected.

4.11 999 Clarke

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
-	--	-	-	-	-	O	O	--	--	+	-	O

4.11.1 999 Clarke is a site south of the B4035 and west of Henbrook Lane, south of Upper Brailes. The site is a long narrow field currently comprising remnant orchard trees amongst amenity grassland.

SEA1	'Grove End' and 'Henbrook Farmhouse', both Grade II Listed Buildings, are situated within 50m of the site perimeter and are clearly visible. The setting of these cultural assets is likely to be adversely affected following development. The site is also situated within a former medieval settlement.
SEA2	The topography of this site is largely flat and comprises amenity grassland and several orchard trees, set amongst existing built form to the north and south. Orchards are recognised to be characteristic of the Cotswolds ⁶⁰ , therefore their loss is likely to adversely affect the landscape character. Development is anticipated to increase property density to a level out of character with the surrounding area, whilst the change in use of land from amenity grassland to residential is also anticipated to adversely affect the local landscape character. This pattern of dwellings separated by small orchard fields is characteristic of Brailes and is designated as not suitable for development ⁶¹ .
SEA3	The main habitats present at the site are amenity grassland and orchard trees. Orchards are a habitat of principal importance. Further to this, orchard is recognised as a highly distinctive habitat within the Brailes area ⁶² . The site also has native hedge and mature hedge tree at the perimeter, which are likely to host further biodiversity. Overall, development at the site would be anticipated to adversely affect biodiversity in the area.
SEA4	This site is within Flood Zone 1 and is therefore at the lowest risk of fluvial flooding. Risk from surface water flooding is low to medium at this location.
SEA6	Land at the site is entirely undeveloped and is thought to have relatively high biodiversity value. Development at this site, therefore, is not considered to be an efficient use of land.

⁶⁰ Cotswolds AONB Management Plan 2013-2018 (2013)

⁶¹ Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Additional Study Areas

⁶² The Habitat Biodiversity Audit and Warwickshire County Council (2010) Stratford-on-Avon District Ecological and Geological Assessment

SEA9	The PRow network around the site is good, with footpaths located a short distance to the north and south which are likely to encourage walking by prospective residents. The nearest bus stop is found on the B4035 approximately 450m east of the site.
SEA12	The PRow network around the site facilitates good access to the surrounding countryside via walking or running. Playing fields are situated approximately 330m north east offering proximal public open space for prospective residents. Allotments are also situated approximately 600m north of the site, promoting a healthy and sustainable lifestyle.
SEA13	Development is not anticipated to involve the loss of any employment land, therefore it is likely that the local economy will be unaffected.

4.12 553 Henbrook Lane

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
-	--	-	+	-	-	O	O	--	--	+	-	-

4.12.1 553 Henbrook Lane is a site south of the B4035 and east of Henbrook Lane, south of Upper Brailes. The site is currently used for hay and silage with hedges and linear scrub at the perimeter.

SEA1	'Grove End' and 'Henbrook Farmhouse,' both Grade II Listed Buildings, are situated within 50m of the site perimeter and are clearly visible. The setting of these cultural assets is likely to be adversely affected following development. The site is also situated within a former medieval settlement.
SEA2	The site comprises a field used for hay and silage with a gently undulating topography. Set largely away from built form, with the exception of the Grade II Listed Building 'Farmhouse', this site acts as a clear boundary between the developments of Upper and Lower Brailes which lie south of the B4035. Development within the site may, therefore, lead to coalescence of the two settlements. Views from the public footpath which is situated south of the site may be adversely affected should development go ahead. The AONB Management Plan indicates that changes in land use away from agricultural uses may be harmful to the landscape character ⁶³ . Overall this site is deemed to have a high sensitivity to housing development ⁶⁴ .
SEA3	The site is currently in agricultural use which and is therefore seen to have lower biodiversity value than the surrounding areas, however hedges, trees and linear scrub at the site perimeter are thought to be species-rich. Despite this, the presence of non-native species within these areas is concerning for local biodiversity ⁶⁵ . There is also a pond and wetland to the north and potential LWS to the south which are thought to have increased biodiversity value, both within 100m of the site perimeter.
SEA4	This site is within Flood Zone 1 and is therefore at the lowest risk of fluvial flooding. Risk from surface water flooding is low at this location.

⁶³ Cotswolds AONB Management Plan 2013-2018 (2013)

⁶⁴ Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Additional Study Areas

⁶⁵ Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Additional Study Areas

SEA6	Land at the site is entirely undeveloped and is currently in use for agricultural purposes. Development at this site, therefore, is not considered to be an efficient use of land.
SEA9	The PRoW network around the site is good, with footpaths located a short distance to the north, south and east which are likely to encourage walking by prospective residents. The nearest bus stop is found on the B4035 approximately 400m east of the site.
SEA12	The PRoW network around the site facilitates good access to the surrounding countryside via walking or running. Playing fields are situated approximately 290m north east offering proximal public open space for prospective residents.
SEA13	Development at this site is anticipated to involve the loss of agricultural land which may adversely impact the local economy.

4.13 425e James

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
-	-	-	--	-	-	O	O	--	--	+	-	O

4.13.1 425e James is a site south of the B4035 and west of Sutton Lane and Blake Close, west of Lower Brailes. The site comprises improved grassland currently managed as paddocks. There are hedges and trees at the northern, eastern and western perimeters, with no existing boundary at the southern perimeter separating the site from the rest of the field.

SEA1	There are no cultural assets within or in close proximity to this site, therefore development would be anticipated to have no impact on the cultural heritage of the region. However, ridge and furrow exists at the site, therefore this archaeological feature may be lost through development at the site.
SEA2	This site is a large open field, currently thought to be managed as a paddock, with a gently undulating topography. The site is set amongst existing built form to the north and east which provides good screening from High Street, whilst good screening to the public footpath to the south is provided by a recently established hedge. This site is deemed to have high-medium sensitivity to housing development ⁶⁶ .
SEA3	The main habitat present at the site is improved grassland. Habitats at the site perimeter include both new and mature hedgerows which are expected to host the majority of the biodiversity at the site. Hedges at the southern site boundary have good connectivity with surrounding areas which is important for local biodiversity.
SEA4	This site is within Flood Zone 1 and is therefore at the lowest risk of fluvial flooding. However, the risk of surface water flooding is medium to high at this location.
SEA6	Land at the site is entirely undeveloped and is currently in use as a paddock. Development at this site, therefore, is not considered to be an efficient use of land.
SEA9	The PRoW network around the site is good, with a footpath located a short distance to the south to encourage walking by prospective residents. The nearest bus stop is found on the B4035 approximately 260m north of the site.

⁶⁶ Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Additional Study Areas

SEA12	The PRow network around the site facilitates good access to the surrounding countryside via walking or running. Playing fields are situated approximately 250m north offering proximal public open space for prospective residents.
SEA13	Development is not anticipated to involve the loss of any employment land, therefore it is likely that the local economy will be unaffected.

4.14 189 Righton

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
-	--	-	--	-	-	-	0	--	--	+	-	-

4.14.1 189 Righton is a site east of Sutton Lane and south of Jeffs Close. The site is spread across two fields separated by a hedge, both are used for agriculture with hedges and linear scrub at the perimeter.

SEA1	There are no cultural assets within or in close proximity to this site, therefore development would be anticipated to have no impact on the cultural heritage of the region. However, ridge and furrow exists at the site, therefore this archaeological feature may be lost through development at the site.
SEA2	This site is set across two agricultural fields, separated by a hedge, with a topography which gently slopes down from towards Sutton Brook east of the site. There is existing built form to the north with no screening between the site and these dwellings. The Cotswolds AONB Management Plan ⁶⁷ indicates that changes to land use in relation to agriculture may have a negative impact on landscape character. There are public footpaths to the east with views of the site which are likely to be adversely affected by development at the site due to the general lack of screening. A recent landscape study suggests this site has a high-medium sensitivity to housing development ⁶⁸ .
SEA3	The site is currently in agricultural use and is therefore thought to have lower biodiversity value than the surrounding areas, however hedges at the site perimeter are thought to be more biodiverse. An area of woodland surrounding Sutton Brook and further woodland beyond Sutton Brook are situated less than 100m east of the site perimeter which may have greater biodiversity value. Although development is not anticipated to extend to this region, it is likely to be at least partially disturbed through development at the site.
SEA4	The majority of the site is within Flood Zone 1, with areas of Flood Zones 2 and 3 toward the eastern perimeter. Risk from surface water flooding is medium to high at this location.
SEA6	Land at the site is entirely undeveloped and is currently in use for agricultural purposes. Development at this site, therefore, is not considered to be an efficient use of land.

⁶⁷ Cotswolds AONB Management Plan 2013-2018 (2013)

⁶⁸ Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Additional Study Areas

SEA7	There is a risk of contaminating Sutton Brook waterway during construction.
SEA9	The PRow network around the site is good, with two footpaths located a short distance to the east which are likely to encourage walking by prospective residents. Bus stops found on the B4035 are anticipated to be within 370m of all areas of the site.
SEA12	The PRow network around the site facilitates good access to the surrounding countryside via walking or running. Playing fields are situated approximately 500m north west offering proximal public open space for prospective residents.
SEA13	Development at this site is anticipated to involve the loss of agricultural land which may adversely impact the local economy.

4.15 188 Taylor

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
-	--	-	--	-	-	-	O	--	--	+	-	O

4.15.1 188 Taylor is a site south of Orchard Close. The site is a field of improved grassland with linear scrub and hedges at the perimeter, with Sutton Brook found at the western edge of the site.

SEA1	Adjacent to the east of the site is Brailes Conservation Area. 'Church of England School', a Grade II Listed Building, is situated less than 100m north of the site perimeter. The extent of the screening from foliage present is not known, therefore an adverse impact on the setting of this cultural asset is possible. Ridge and furrow exists at the site, this archaeological feature may be lost through development at the site.
SEA2	This site comprises a large field of improved grassland with a gently sloping topography down towards Sutton Brook at the western perimeter of the site. There is existing built form surrounding most of the site perimeter. Screening from these buildings to the site is mixed with some surrounding properties, such as those on Cow's Lane to the south east, anticipated to have clear views of any development at the site. The public footpath to the east is also thought to have filtered views of the site. This site is deemed to have high-medium sensitivity to housing development ⁶⁹ .
SEA3	The main habitat present at this site is improved grassland, with linear scrub and trees also present at the site perimeter. Adjacent to the east of the site is Sutton Brook which is anticipated to be more biodiverse. Further to this, there is an area of woodland adjacent to the south, also associated with the region around Sutton Brook, which is anticipated to have greater biodiversity than the grassland of the site itself. Development is anticipated to have an adverse impact on the biodiversity in these areas.
SEA4	The majority of the site is within Flood Zones 2 and 3 associated with Sutton Brook, therefore the risk of fluvial flooding at this site is high. The risk of surface water flooding is also thought to be high at this location.
SEA6	Land at the site is entirely undeveloped and is currently unused, however development at this site would not be seen as an efficient use of natural resources.

⁶⁹ Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Additional Study Areas

SEA7	There is a risk of contaminating Sutton Brook waterway during construction.
SEA9	The PRow network around the site is good, with footpaths located a short distance to the east which are likely to encourage walking by prospective residents. The nearest bus stop is found on the B4035 approximately 300m north east of the site.
SEA12	The PRow network around the site facilitates good access to the surrounding countryside via walking or running. Playing fields are situated approximately 500m north west offering proximal public open space for prospective residents. Private allotments are also situated approximately 500m east of the site.
SEA13	Development is not anticipated to involve the loss of any employment land, therefore it is likely that the local economy will be unaffected.

4.16 999 Binns

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
-	-	-	--	-	-	-	O	--	--	+	-	O

4.16.1 999 Binns is a site west of Cow Lane. The site currently comprises a tennis court and further associated hardstanding, with woodland, linear scrub and Sutton Brook found at the site perimeter.

SEA1	Adjacent to the east of the site is Brailes Conservation Area, therefore development at the site may have an adverse effect on the overall sense of place and local distinctiveness of the area. Ridge and furrow exists at the site, although much of the site is already developed so it is likely that this archaeological feature is already damaged or lost.
SEA2	The site is largely PDL, partially screened by foliage from surrounding areas. The site has very limited existing built form in the surrounding areas. However, views from the dwellings adjacent to the north anticipated to be negatively affected by development at the site. Views from the public footpaths which are found to the east of the site may also be adversely affected by development.
SEA3	As the site is mostly PDL, biodiversity is thought to be low. However, in close proximity are woodland habitats and marshy areas associated with Sutton Brook which may be adversely affected by development at the site.
SEA4	The site is within Flood Zone 1. Risk of surface water flooding is high at this location.
SEA6	A tennis court and associated hardstanding make up most of the site. Development at the site would be likely to involve the use of some undeveloped land. Overall, development at this location would represent an efficient use of the natural resources of the area.
SEA7	There is a risk of contaminating Sutton Brook waterway during construction.
SEA9	The PRow network around the site is very good, with footpaths located a short distance to the east which are likely to encourage walking by prospective residents. The nearest bus stop is found on the B4035 approximately 260m north east of the site.

SEA12	The PRow network around the site facilitates good access to the surrounding countryside via walking or running. Playing fields are situated approximately 530m north west offering proximal public open space for prospective residents. Private allotments are also situated approximately 310m east of the site.
SEA13	Development is not anticipated to involve the loss of any employment land, therefore it is likely that the local economy will be unaffected.

4.17 154 Righton

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
-	--	-	+	-	-	O	O	--	--	+	-	-

4.17.1 154 Righton is a site south of Cow Lane. The site comprises the north eastern area of a large open field of pasture, with no distinct boundary from the rest of the field. The remaining perimeter of the site comprises linear scrub and hedges.

SEA1	The site is adjacent to Brailes Conservation area, therefore development at the site may have an adverse effect on the overall sense of place and local distinctiveness of the area. Adjacent to the east of the site are two Grade II Listed Building associated with Plumtree Farm, these buildings have a clear view of the site. Development at this location is likely to have an adverse impact on the setting of these buildings. There are surviving examples of ridge and furrow within the field, although most lie in the southern area which is outside of the proposed site.
SEA2	The site comprises the northern part of an open field with a gently sloping topography from east to west. The site is currently used for pasture. The Listed Buildings associated with the Plumtree Farm represent the only existing built form in close proximity, therefore developments at the site would be largely exposed within the surrounding landscape. Views from the two public footpaths which run through the site are anticipated to be negatively affected by development. This site is thought to have high sensitivity to housing development in the WCC Focused Landscape Study ⁷⁰ .
SEA3	Biodiversity is thought to be low at the site as the primary habitat is improved grassland which is used for pasture. The site is 100m from Lower Brailes Meadow potential LWS, this area could potentially be disturbed by development at this site.
SEA4	The site is within Flood Zone 1. Risk of surface water flooding is very low at this location.
SEA6	The site is entirely undeveloped greenfield, currently used for pasture. Development at this location would not be seen as an efficient use of the area's natural resources.
SEA9	The PRow network around the site is good, with two footpaths running through the site which are likely to encourage walking by prospective residents. The nearest bus stop is found on the B4035 approximately 240m north east of the site.

⁷⁰ Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Study

SEA12	The PRow network around the site facilitates good access to the surrounding countryside via walking or running. Private allotments are also situated approximately 260m east of the site.
SEA13	The site is currently used for pasture, therefore development is anticipated to result in the loss of land available for this purpose and an adverse impact on the local economy.

4.18 999 Righton Allotments

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
--	--	-	-	-	-	O	O	--	--	+	-	O

4.18.1 999 Righton Allotments is a site south of the B4035 and south of Cow Lane. The site comprises a plot of private allotments which are adjacent the B4035, with areas of amenity grassland and trees at the site perimeter to the east.

SEA1	The site is within Brailes Conservation area, therefore development at the site may have an adverse effect on the setting of some cultural assets. Four Grade II Listed Buildings are found Within 100m metres of the site perimeter, these buildings have a clear view of the site with limited screening present. Development at this location is likely to have an adverse impact on the setting of one or more of these buildings. This site is also situated within a former medieval settlement.
SEA2	The site comprises Lower Brailes Allotments, set on land with a flat topography. Adjacent to the west are several dwellings which make up the only existing built form around the site, with amenity grassland and trees found to the east and south. Views from the public footpaths found to the east are anticipated to be negatively affected by development at this site. The Lower Brailes Allotments are thought to form part of the rural character of the area, especially given the proximity to amenity grassland and centrality within the village of Lower Brailes.
SEA3	This site is currently used as allotments which have the capacity for relatively high levels of biodiversity through appropriate management ⁷¹ . The surrounding areas include amenity grassland, with a small patch of woodland adjacent to the south east of the site. Any biodiversity present in these areas is anticipated to be adversely affected by development at this site.
SEA4	The site is within Flood Zone 1. The stretch of B4035 adjacent to the north is thought to have a medium risk of surface water flooding which may adversely affect any future developments at this site.
SEA6	The site is entirely undeveloped greenfield, currently used as allotments. Development at this location would not be seen as an efficient use of the area's natural resources.

⁷¹ Natural England (2007) Wildlife on Allotments

SEA9	The PRow network around the site is good, with two footpaths running through the site which are likely to encourage walking by prospective residents. The nearest bus stop is found on the B4035 approximately 30m east of the site.
SEA12	The PRow network around the site facilitates good access to the surrounding countryside via walking or running. The allotments situated at the site are anticipated to be lost through development which would reduce the amount of public open space available for existing and prospective residents.
SEA13	Development is not anticipated to involve the loss of any employment land, therefore it is likely that the local economy will be unaffected.

4.19 221 Compton West

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
--	--	O	+	-	-	O	O	--	--	+	-	-

4.19.1 221 Compton West is a site west of Salt Way Lane. The site comprises the westernmost area of an open field currently under arable cultivation with hedges and trees at the perimeter.

SEA1	The site is adjacent to Brailes Conservation Area to the south, therefore development at the site may have an adverse effect on the overall sense of place and local distinctiveness of the area. 'Old Rectory Farmhouse and Attached Roman Catholic Chapel of Saint Peter and Saint Paul', a grade II* Listed Building, lies adjacent to the southern perimeter of the site next to a further Grade II Listed Building associated with the same church. There is a lack of substantial screening present, therefore development is anticipated to negatively affect the setting of these cultural assets. This site is also situated within a former medieval settlement.
SEA2	The site comprises the westernmost area of a large agricultural field with flat topography and no distinct boundary from the remaining area of this field. The two Listed Buildings adjacent to the south represent the only existing built form in close proximity, therefore development at this site is likely to be out of keeping with the existing landscape character. Views from the adjacent public footpaths are anticipated to be adversely affected by development. The recent WCC Focused Landscape Study states that ' <i>Hedgerow boundaries are trimmed and in relatively good condition, but infrequent hedgerow trees create an open landscape with views towards the commercial estate to the east and countryside to the north</i> ⁷² . Overall this study found the site to have a high-medium sensitivity to housing development ⁷³ .
SEA3	The site is currently in agricultural use and is therefore thought to have lower biodiversity value than the surrounding areas, however hedges at the site perimeter are thought to be more biodiverse. A small area of woodland exists beyond the western perimeter of the site but this is not well connected to surrounding areas and is unlikely to be disturbed by development.
SEA4	The site is within Flood Zone 1. Risk of surface water flooding is seen to be very low at this site.

⁷² Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Study

⁷³ Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Study

SEA6	The site is entirely undeveloped greenfield, currently used for agricultural purposes. Development at this location would not be seen as an efficient use of the area's natural resources.
SEA9	The PRow network around the site is good, with two footpaths running adjacent to the site which are likely to encourage walking by prospective residents. The nearest bus stop is found on the B4035 approximately 310m south of the site.
SEA12	The PRow network around the site facilitates good access to the surrounding countryside via walking or running. Private allotments are also situated approximately 320m south of the site.
SEA13	Development at this site is anticipated to involve the loss of agricultural land which may adversely impact the local economy.

4.20 222 Compton East

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
--	--	O	+	-	-	O	O	--	--	+	-	-

4.20.1 222 Compton East is a site west of Salt Way Lane. The site comprises the easternmost area of an open field currently under arable cultivation with hedges and trees at the perimeter.

SEA1	'Old Rectory Farmhouse and Attached Roman Catholic Chapel of Saint Peter and Saint Paul', a grade II* Listed Building, lies approximately 100m south west of the site perimeter next to a further Grade II Listed Building associated with the same church. There is a lack of substantial screening present, therefore development is anticipated to negatively affect the setting of these cultural assets. This site is also situated within a former medieval settlement.
SEA2	The site comprises the easternmost area of a large agricultural field with flat topography and no distinct boundary from the remaining area of this field. There is no existing built form in close proximity other than the commercial units east of Salt Way Lane, therefore development at this site is likely to be out of keeping with the existing landscape character. Views from the adjacent public footpath are anticipated to be adversely affected by development. The recent WCC Focused Landscape Study states that ' <i>Hedgerow boundaries are trimmed and in relatively good condition, but infrequent hedgerow trees create an open landscape with views towards the commercial estate to the east and countryside to the north</i> ⁷⁴ . Overall this study found the site to have a high-medium sensitivity to housing development ⁷⁵ .
SEA3	The site is currently in agricultural use and is therefore thought to have lower biodiversity value than the surrounding areas, however hedges at the site perimeter are thought to be more biodiverse.
SEA4	The site is within Flood Zone 1. Risk of surface water flooding is seen to be very low at this site.
SEA6	The site is entirely undeveloped greenfield, currently used for agricultural purposes. Development at this location would not be seen as an efficient use of the area's natural resources.

⁷⁴ Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Study

⁷⁵ Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Study

SEA9	The PRow network around the site is good, with a footpath running adjacent to the site which is likely to encourage walking by prospective residents. The nearest bus stop is found on the B4035 approximately 300m south of the site.
SEA12	The PRow network around the site facilitates good access to the surrounding countryside via walking or running. Private allotments are also situated approximately 310m south of the site.
SEA13	Development at this site is anticipated to involve the loss of agricultural land which may adversely impact the local economy.

4.21 Summary of site assessment scores

Table 4.1 summarises the assessment scores for all sites: 1, 422 Manley Castle Hill Lane. 2, 512 Manley Castle Hill Lane. 3, 516 Manley Castle Hill Lane. 4, 517 Manley Castle Hill Lane. 5, 513 Pogmore's. 6, 538e Salt. 7, 545 and 546 Scarfe. 8, 999 Clarke. 9, 553 Henbrook Lane. 10, 425e James. 11, 189 Righton. 12, 188 Taylor. 13, 999 Bins. 14, 154 Righton. 15, 999 Righton Allotments. 16, 221 Compton West. 17, 222 Compton East.

Table 4.1: SEA Objective scoring matrix for all sites

	SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
	Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
1	--	--	O	+	-	-	O	O	--	--	+	-	-
2	--	--	-	--	-	-	O	O	--	--	+	-	O
3	--	--	-	-	-	-	O	O	--	--	+	-	O
4	--	--	--	--	-	-	O	O	--	--	+	-	O
5	-	--	--	+	-	-	O	O	--	--	+	-	O
6	-	--	-	+	-	-	O	O	--	--	+	-	O
7	-	--	-	+	-	-	O	O	--	--	+	-	O
8	-	--	-	-	-	-	O	O	--	--	+	-	O
9	-	--	-	+	-	-	O	O	--	--	+	-	-
10	-	-	-	--	-	-	O	O	--	--	+	-	O
11	-	--	-	--	-	-	-	O	--	--	+	-	-
12	-	--	-	--	-	-	-	O	--	--	+	-	O
13	-	-	-	--	-	-	-	O	--	--	+	-	O
14	-	--	-	+	-	-	O	O	--	--	+	-	-
15	--	--	-	-	-	-	O	O	--	--	+	-	O
16	--	--	O	+	-	-	O	O	--	--	+	-	-
17	--	--	O	+	-	-	O	O	--	--	+	-	-

5 Assessment Findings: Preferred Options

5.1.1 The text in **Box 4.1** has been prepared by the Brailes NDP Steering Group which explains how the reasonable alternatives have been rejected and selected respectively. Within the latest version of the pre-submission NDP, the Steering Group have identified four preferred options, all of which are areas which fall inside the boundaries of the sites assessed within **Chapter 4**, for inclusion within the Brailes Built Up Area Boundary (BUAB). These are shown in **Figure 4.2**:

- Site 1 Sutton Lane (North western area of site 189 Righton)
- Site 2 Castle Hill (South eastern area of site 512 Manley Castle Hill Lane)
- Site 3 Sutton Lane (Eastern area of site 425e James)
- Site 4 Upper Brailes (Northern area of 545 & 546 Scarfe)

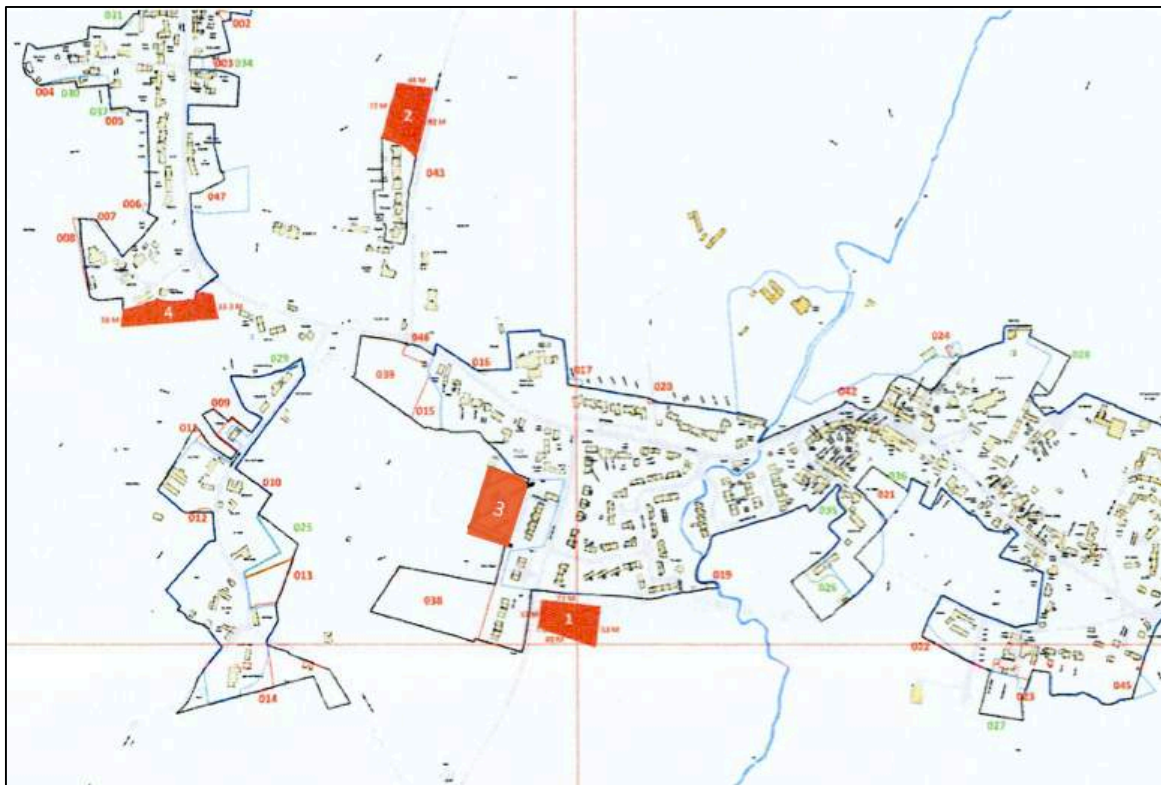


Figure 4.2: Map of selected reasonable alternatives (sites)

Box 4.1: An outline of the reasons for selecting the alternatives dealt with (text prepared by Brailes NDP Steering Group)

Selection process

The steering group ranked all the offered sites in order of acceptability for development as judged by the assessment tool results (see Table 1). This tool takes into account the importance of landscape and environment criteria as judged by parishioners and its use is explained in our site analysis assessment document (below).

The steering group worked its way down this list, speaking to landowners with sites that would fit the small site policy and contribute to our affordable homes quota (as determined by the Brailes Housing Needs Survey 2016).

The original Lepus site analysis was based on the sites put forward in the “call for sites” process. The work done by the NDP team recognised that to meet the criteria we had set ourselves (see appendix b), we would not be selecting large sites. As a consequence, the sites selected only included those that could accommodate six houses.

Selected sites

Righton Sutton Lane 189

A low score on the assessment tool and therefore considered an appropriate site. Landowner willing to offer site for 6 homes, including 2 affordable. Housing association willing to support 2 affordable homes on this site. The original Lepus assessment showed the site as having a “- -” for flooding, the section of the site selected to support six houses is not in the area prone to flooding. In addition, the selection of small sites has less impact on the landscape and the environment.

James 425e

A low score on the assessment tool and therefore considered an appropriate site. Landowner willing to offer site for 6 homes, including 2 affordable. Housing association willing to support 2 affordable homes on this site. The original Lepus assessment showed the site as having a “- -” for flooding, the section of the site selected to support six houses is not in the area prone to flooding. In addition, the selection of small sites has less impact on the landscape and the environment.

Manley Castle Hill Lane 512

Landowner willing to offer site for 6 homes, including 2 affordable. Housing association willing to support 2 affordable homes on this site. The original Lepus assessment showed the site as having a “- -” for flooding, the section of the site selected to support six houses is not in the area prone to flooding. In addition, the selection of small sites has less impact on the landscape and the environment.

Whilst this site scored lower than the Manley’s 422 Castle Hill Lane, it was given preference because it was next to a recently developed site

This site also scores “- -” on Cultural Heritage, the group is aware of this and has put a Policy in the Plan (see Policy H4) to mitigate any adverse effect on Castle Hill (Scheduled Ancient Monument).

Scarfe Land 545/546

Landowner willing to offer site for 6 homes, including 2 affordable. Housing association willing to support 2 affordable homes on this site. In addition, the selection of small sites has less impact on the landscape and the environment.

Rejected sites

Compton Estates West 221

A low score on the assessment tool and therefore considered an acceptable site. Withdrawn as landowner unwilling to offer land for 6 homes.

Compton Estates East 222:

A low score on the assessment tool and therefore considered an acceptable site. Withdrawn as landowner unwilling to offer land for 6 homes.

Binns 999

A low score on the assessment tool and therefore considered an acceptable site. However this site is not suitable for 6 homes and therefore would not contribute to our small site policy and affordable homes quota.

Manley Castle Hill Ln 422

A low score on the assessment tool and therefore considered an acceptable site. Landowner willing to offer site for 6 homes, including 2 affordable. Housing association willing to support 2 affordable homes on this site. However proximity to Castle Hill a listed monument was felt to be against inclusion of this site. Also, developing here was not felt to be a natural continuation of development, but extending the village far beyond the current BUAB.

Pogmore 513

A small site and not suitable for 6 homes. While suitable for 3 homes this would not contribute towards affordable home quota as not viable to build 1 affordable home - as would not be supported by housing association.

Scarfe Chapel

The site was withdrawn by the landowner so as to concentrate on the one plot we had accepted.

Clark 999

A single site only and not suitable for 6 homes.

Salt 538e

A single site only and not suitable for 6 homes.

Righton Cow Lane 154

This landowner had already offered site 189, which was felt to be more acceptable given a much lower score on the assessment criteria.

Righton Allotment

A single site only and not suitable for 6 homes.

Taylor Mid:

Landowner did not offer the land for 6 homes by deadline for submission. No agreement letter supplied.

Unexplored sites

The following sites were not explored, as we had reached our affordable home quota. The higher ranking sites are less desirable to build on than lower ranking sites (see Table 1):

- Henbrook Lane 553
- Manley High St 516
- Manley Centre N 517
- Taylor Mid + CA
- Taylor CA only
- Taylor whole field

Table 1 Ranking of all the offered sites in order of acceptability

Rank	Site Name	Score	Affordable Houses
1	Compton Estates 222 East	0.30	
2	Righton 189 Sutton Lane	3.22	2
3	James 425 e	9.17	2
4	Compton Estates 221 West	9.21	
5	Binns 999	9.26	
6	Manley422 Castle Hill Ln	9.60	
7	Pogmore 513	11.72	
8	Scarfe Chapel	11.89	
9	Clark 999	12.26	
10	Salt 999	12.26	
11	Righton 154 Cow Lane	12.50	
12	Righton Allotment	13.90	
13	Manley 512s Castle Hill Ln	13.95	2
14	Scarfe Land 545/546	16.92	2
15	Taylor Mid	16.99	
16	Henbrook Lane 553	17.78	
17	Manley 516 High Street	18.67	
18	Manley 517 Centre N	19.77	
19	Taylor Mid +Con	21.63	
20	Taylor CA only	21.63	
21	Taylor Whole Field		

Site Analysis Assessment Document

A number of potential development sites were offered by local land owners. The challenge for the Neighbourhood Plan team was to priorities these potential development sites according to their suitability and desires of village residents.

In the 2015 Survey "About You and Your Ideas" Q5 asked people to select, from a list of statements, "those which most closely represents your views". The top two were:

- The provision of affordable housing for people with local connections with a score of over 86%
- A gradual addition of the dwellings through to 2031 with a score of over 81%

The above provided the foundation for the housing policy within the Neighbourhood Plan.

A process was been developed that incorporates feedback from local residents. This makes the allocation of development sites inclusive and collective exercise, in-line with the ethos of the National Planning Policy Framework (NPPF).

Residents were asked two fundamental and important questions at the 16th and 18th January, 2016, open day:

1. Where they would like to build (WTB) and where they would like not to build (WNTB), and
2. What were the most important criteria to consider when deciding the suitability of a development site?

The criteria are as follows, which are listed in order of priority according to resident feedback.

- Flooding
- Landscape Sensitivity High
- Landscape Sensitivity Med/High
- Conservation Area
- Green Finger
- AONB
- Green Separation Corridors
- VDS Views
- Green Entry Corridors
- Habitat High (4-6)
- Habitat Low (1-3)
- Ridge & Furrow
- Medieval Settlement
- Footpath
- Medieval Earthworks

Feedback from WTB and WNTB was incorporated with resident input on the above criteria that should be considered when deciding the suitability of a development site.

A call for possible development sites was made as part of the NP process. Land owners came forward with sites, which were clearly marked on local maps, enabling the boundaries of each site to be determined.

Each site was researched using published data and maps to see if a specific criterion applied. For example: the conservation area for Lower Brailes is clearly marked on the village map. If a site, or part of a site, fell within a conservation area the site received an adverse score. This process was carried out for all the sites and all the criteria.

The data on whether a particular criterion applied to a site was then entered into the evaluation tool – see figure below. Each site was then processed through the evaluation tool to allow a comparison to be made of all the sites on their location and development suitability.

As part of the data gathering process, the group commissioned WCC to carry out a sensitivity assessment of each site in the “call for sites” process. The group found that the “broad brush” approach used by SDC for the Core Strategy was not detailed enough. The results of these assessments were fed into the analysis tool to help evaluate the sites.

The WCC reports also expressed a view about the suitability of development on sites that scored “high”, this was purely in terms of landscape sensitivity.

As a group we had to consider the need to provide affordable houses, the need for small sites and the need for gradual development. We felt that providing small sites, based on the analysis tool overrode the specific landscape comments.

Brailes Neighbourhood Development Plan																				
SITES ASSESSMENT																				
Developing criteria application process																				
CRITERIA	Initial Rating	Magnify Factor	Interim Rating	Override weight	Output Weighting	Site From Righton Field Name Allocation Sub Division n/a	Righton 154 Cow Lane n/a	Righton 189 Sutton Lane n/a	Compton Estates 221 West n/a	Compton Estates 222 East n/a	Manley 422 CH Lane N n/a	Manley 512 CH Ln S n/a	Pogmore 511 n/a	ManH 516 H n/a	Score	Score	Score	Score	Score	
9	14	1	14.00	1	14.0	y/n	n	n	n	n	n	n	n	n	0.0	0.0	0.0	0.0	0.0	
10	13	0.75	9.75	1	9.8	y	y	y	y	y	y	y	y	y	5.8	5.8	5.8	5.8	5.8	
11	12	0.56	6.75	1	6.8	y	y	y	y	y	y	y	y	y	6.8	6.8	6.8	6.8	6.8	
12	11	0.42	4.64	1	4.6	y	y	y	y	y	y	y	y	y	4.6	4.6	4.6	4.6	4.6	
13	10	0.32	3.16	1	3.2	n	n	n	n	n	n	n	n	n	0.0	0.0	0.0	0.0	0.0	
14	9	0.24	2.16	1	2.1	y	y	y	y	y	y	y	y	y	2.1	2.1	2.1	2.1	2.1	
15	8	0.18	1.42	1	1.4	n	n	n	n	n	n	n	n	n	0.0	0.0	0.0	0.0	0.0	
16	7	0.13	0.93	1	0.9	n	n	n	n	n	n	n	n	n	0.0	0.0	0.0	0.0	0.0	
17	6	0.10	0.60	1	0.6	n	n	n	n	n	n	n	n	n	0.0	0.0	0.0	0.0	0.0	
18	5	0.08	0.38	1	0.4	n	n	n	n	n	n	n	n	n	0.0	0.0	0.0	0.0	0.0	
19	5	0.06	0.28	1	0.3	y	y	y	y	y	y	y	y	y	0.3	0.3	0.3	0.3	0.3	
20	4	0.04	0.17	1	0.2	n	n	n	n	n	n	n	n	n	0.0	0.0	0.0	0.0	0.0	
21	3	0.03	0.10	1	0.1	y	y	y	y	y	y	y	y	y	0.1	0.1	0.1	0.1	0.1	
22	2	0.02	0.05	1	0.0	n	n	n	n	n	n	n	n	n	0.0	0.0	0.0	0.0	0.0	
23	1	0.02	0.02	1	0.0	n	n	n	n	n	n	n	n	n	0.0	0.0	0.0	0.0	0.0	
24						In options below enter 'n' or 'N' as weighting for site														
25	14	1.00	14.00	1	14.0	n	n	n	n	n	n	n	n	n	0.0	0.0	100%	-14.0	0.0	
26	14	1.00	14.00	1	14.0	n	n	n	n	n	n	n	n	n	0.0	0.0	50%	7.3	0.0	
27																				
28																				
29																				
30																				
31																				
32																				
33																				
34																				

Table 2 shows the sites in score sequence, from low to high.

Results in Score Sequence	Score
Compton Estates 222 East	0.30
Righton 189 Sutton Lane	3.22
James 425 e	9.17
Compton Estates 221 West	9.21
Binns 999	9.26
Manley 422 Castle Hill Ln	9.60
Pogmore 513	11.72
Scarfe Chapel	11.89
Clark 999	12.26
Salt 999	12.26
Righton 154 Cow Lane	12.50
Righton Allotment	13.90
Manley 512s Castle Hill Ln	13.95
Scarfe Land 545/546	16.92
Taylor Mid	16.99
Henbrook Lane 553	17.78
Manley 516 High Street	18.67
Manley 517 Centre N	19.77
Taylor Mid +Con	21.63
Taylor CA only	21.63
Taylor Whole Field	35.63

5.2 Assessment of Preferred Options

5.2.1 As the boundaries differ between the sites assessed in **Chapter 4** and the Preferred Options put forward by Brailes NDP Steering Group, assessments have been performed based on the revised site boundaries.

5.3 Site 1 Sutton Lane

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
-	-	0	+	-	-	0	0	--	--	+	-	-

5.3.1 Sutton Lane is a site east of Sutton Lane and south of Jeffs Close, comprising the north western area of 189 Righton. The site is within an agricultural field with hedges at the northern, southern and western perimeters. There is no existing boundary at the eastern site perimeter separating the preferred option from the remainder of the agricultural field.

SEA1	There are no cultural assets within or in close proximity to this site, therefore development would be anticipated to have no impact on the cultural heritage of the region. However, ridge and furrow exists at the site, therefore this archaeological feature may be lost through development at the site.
SEA2	This site is set across two agricultural fields, separated by a hedge, with a topography which gently slopes down from towards Sutton Brook east of the site. There is existing built form to the north with no screening between the site and these dwellings. The Cotswolds AONB Management Plan ⁷⁶ indicates that changes to land use in relation to agriculture may have a negative impact on landscape character. There are public footpaths to the east with views of the site which are likely to be adversely affected by development at the site due to the general lack of screening. A recent landscape study suggests this site has a high-medium sensitivity to housing development ⁷⁷ . The revised site boundaries will mean development is likely to fall into line with existing built form to the north, therefore the adverse impact of development on the landscape is anticipated to be reduced.

⁷⁶ Cotswolds AONB Management Plan 2013-2018 (2013)

⁷⁷ Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Additional Study Areas

SEA3	The site is currently in agricultural use and is therefore thought to have lower biodiversity value than the surrounding areas, however hedges at the site perimeter are thought to be more biodiverse. The revised site boundaries avoid the area around Sutton Brook to the east which is anticipated to have greater biodiversity value than land at the site. Disturbance of this area is less likely, therefore the adverse impact of development on biodiversity is no longer expected.
SEA4	The site is within Flood Zone 1. Risk from surface water flooding is very low at this location. The revised site boundaries will result in development avoiding areas at greater risk of pluvial and surface water flooding.
SEA6	Land at the site is entirely undeveloped and is currently in use for agricultural purposes. Development at this site, therefore, is not considered to be an efficient use of land.
SEA7	The revised site boundaries result in development in areas close to Sutton Brook being avoided, therefore the risk of water pollution from construction is reduced.
SEA9	The PRow network around the site is good, with two footpaths located a short distance to the east which are likely to encourage walking by prospective residents. Bus stops found on the B4035 are anticipated to be within 370m of all areas of the site.
SEA12	The PRow network around the site facilitates good access to the surrounding countryside via walking or running. Playing fields are situated approximately 500m north west offering proximal public open space for prospective residents.
SEA13	Development at this site is anticipated to involve the loss of agricultural land which may adversely impact the local economy.

5.4 Site 2 Castle Hill

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
--	--	O	--	-	-	O	O	--	--	+	-	O

5.4.1 Castle Hill is a site west of Castle Hill Lane, comprising the south eastern area of 512 Manley Castle Hill Lane. The site is north of the existing built form on Castle Hill Lane and is currently grassland with trees. There is intact hedge and linear scrub at the southern and eastern perimeters, however no boundary exists at the northern and western perimeters separating the preferred option from the remainder of the field. The site is occasionally used for car parking for events such as the Brailes Show.

SEA1	A medieval earthwork bank is found at the south and east boundaries of the site. 'Sunnyside', a Grade II Listed Building, is situated approximately 130m south of the site but is partially screened by foliage and the existing dwellings to the east of Castle Hill Lane. 'Castle Hill' SM is found approximately 300m to the north of the site. The site is clearly visible from Castle Hill, therefore the setting of this SM may be adversely affected by development.
SEA2	This site has a flat topography but is situated at the lower slopes of a small stream valley between Brailes Hill and Castle Hill ⁷⁸ . The site is thought to be poor semi-improved grassland ⁷⁹ . Due to the positive contribution that the surrounding fields make to the landscape as a whole, in addition to the high tranquillity of the area and presence of a footpath, a recent landscape study suggests this site has a high sensitivity to housing development ⁸⁰ . Guidelines for 'Escarpment Outliers - Castle Hill' suggest this is a distinctive, highly visible landscape which is highly sensitive to change ⁸¹ . Development at this site, which is within the setting of Castle Hill, could adversely affect the landscape character of the area. Within the Brailes Village Design Statement (1998) ⁸² Castle Hill is suggested to provide ' <i>wonderful views into the village</i> ' which may be adversely affected by development at this site. Although the revised site boundaries will result in development falling more into line with existing built form, it is anticipated that development at the preferred option would still be out of place within the surrounding landscape.

⁷⁸ Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Study

⁷⁹ The Habitat Biodiversity Audit and Warwickshire County Council (2010) Stratford-on-Avon District Ecological and Geological Assessment

⁸⁰ Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Study

⁸¹ Cotswolds AONB Landscape Strategy and Guidelines (2016) LCT1 'Escarpment Outliers'

⁸² Brailes Village Design Statement (1998)

SEA3	Habitats present at the site include poor semi-improved grassland. The perimeter to the east and wooded area to the south of the site have moderate woodland connectivity, disturbance to these areas should be avoided. The revised site boundaries avoid areas of greater biodiversity value both within and in close proximity to the original site, therefore the adverse impact of development on biodiversity is no longer expected.
SEA4	This site is within Flood Zone 1 and is therefore at the lowest risk of fluvial flooding. There are small areas at high risk of surface water flooding in the south eastern region of this preferred option.
SEA6	Land at this site is not currently in use for any specific purpose, but is entirely undeveloped and is thought to have moderate levels of biodiversity. Development at this site, therefore, is not considered to be an efficient use of land.
SEA9	The PRoW network around the site is very good, with footpaths running adjacent to the site which are likely to encourage walking by prospective residents. The nearest bus stop is approximately 400m west of the site.
SEA12	The PRoW network around the site facilitates good access to the surrounding countryside via walking or running. Playing fields are situated east across Castle Hill Lane, offering proximal public open space for prospective residents. Allotments are also situated 360m north west of the site, promoting a healthy and sustainable lifestyle.
SEA13	Development is not anticipated to involve the loss of any employment land, therefore it is likely that the local economy will be unaffected.

5.5 Site 3 Sutton Lane

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
-	-	O	--	-	-	O	O	--	--	+	-	O

5.5.1 Sutton Lane is a site south of the B4035 and west of Sutton Lane and Blake Close, comprising the eastern area of site 425e James. The site comprises improved grassland currently managed as paddocks. There are hedges and trees at the northern and eastern perimeters, with no existing boundary at the southern and western perimeters separating the site from the rest of the field.

SEA1	There are no cultural assets within or in close proximity to this site, therefore development would be anticipated to have no impact on the cultural heritage of the region. However, ridge and furrow exists at the site, therefore this archaeological feature may be lost through development at the site.
SEA2	This site is a large open field, currently thought to be managed as a paddock, with a gently undulating topography. The site is set amongst existing built form to the north and east which provides good screening from High Street, whilst good screening to the public footpath to the south is provided by a recently established hedge. This site is deemed to have high-medium sensitivity to housing development ⁸³ . Although the revised site boundaries will result in development falling more into line with existing built form, it is anticipated that development at the preferred option would still result in an adverse impact upon the surrounding landscape.
SEA3	The main habitat present at the site is improved grassland. Habitats at the site perimeter include both new and mature hedgerows which are expected to host the majority of the biodiversity at the site. The revised site boundaries result in development being situated further from the areas of greater biodiversity value at the south of the site, therefore it is not likely to adversely impact the quality or connectivity of these habitats.
SEA4	This site is within Flood Zone 1 and is therefore at the lowest risk of fluvial flooding. However, the risk of surface water flooding is medium to high at this location.
SEA6	Land at the site is entirely undeveloped and is currently in use as a paddock. Development at this site, therefore, is not considered to be an efficient use of land.

⁸³ Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Additional Study Areas

SEA9	The PRow network around the site is good, with a footpath located a short distance to the south to encourage walking by prospective residents. The nearest bus stop is found on the B4035 approximately 260m north of the site.
SEA12	The PRow network around the site facilitates good access to the surrounding countryside via walking or running. Playing fields are situated approximately 250m north offering proximal public open space for prospective residents.
SEA13	Development is not anticipated to involve the loss of any employment land, therefore it is likely that the local economy will be unaffected.

5.6 Site 4 Upper Brailes

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
-	--	o	+	-	-	o	o	--	--	+	-	o

5.6.1 Upper Brailes is a site south west of the B4035, south of Upper Brailes. The site is currently improved grassland, managed as a small paddock with fencing and hedges at the northern, eastern and western perimeters. There is no existing boundary at the southern perimeter separating the preferred option from the remainder of the field.

SEA1	'Sunnyview and Cottage to Left', a Grade II Listed Building, is situated less than 50m from the site perimeter with partial screening from foliage and the Old Chapel. Development at the site is likely to adversely affect the setting of this cultural asset. This site is also situated within a former medieval settlement, with extensive medieval earthwork banks also present.
SEA2	This site has a mostly flat topography and comprises improved grassland and small areas of woodland. The site has existing built form to north, where Old Chapel and associated buildings are situated. Public footpaths run adjacent to the north and east of the site, the expansive views from these are likely to be adversely affected by development at this site. This site is thought to have high sensitivity to housing development in the WCC Focused Landscape Study ⁸⁴ . Although the revised site boundaries will result in development falling more into line with existing built form, it is anticipated that development at the preferred option would still result in an adverse impact upon the surrounding landscape.
SEA3	The main habitat present at the site is improved grassland. The revised site boundaries avoid the areas of greater biodiversity value to the south of the site, including coniferous semi-natural woodland and habitats associated with a stream. Therefore, development at the preferred option is anticipated to have a negligible impact on biodiversity.
SEA4	This site is within Flood Zone 1 and is therefore at the lowest risk of fluvial flooding. Risk from surface water flooding is low at this location.
SEA6	Land at the site is entirely undeveloped and is thought to currently be used as a paddock. Development at this site, therefore, is not considered to be an efficient use of land.

⁸⁴ Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Study

SEA9	The PRow network around the site is good, with a footpath running adjacent to the site which is likely to encourage walking by prospective residents. The nearest bus stop is found on the B4035 approximately 540m north of the site.
SEA12	The PRow network around the site facilitates good access to the surrounding countryside via walking or running. Playing fields are situated approximately 420m east offering proximal public open space for prospective residents. Allotments are also situated approximately 550m north of the site, promoting a healthy and sustainable lifestyle.
SEA13	Development is not anticipated to involve the loss of any employment land, therefore it is likely that the local economy will be unaffected.

5.7 Summary of preferred options scores

5.7.1 **Table 5.1** summarises the assessment scores for all preferred options: 1, Site 1 Sutton Lane. 2, Site 2 Castle Hill. 3, Site 3 Sutton Lane. 4, Site 4 Lower Brailes.

Table 5.1: SEA Objective scoring matrix for all preferred options

	SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
	Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
1	-	-	O	+	-	-	O	O	--	--	+	-	-
2	--	--	O	--	-	-	O	O	--	--	+	-	O
3	-	-	O	--	-	-	O	O	--	--	+	-	O
4	-	--	O	+	-	-	O	O	--	--	+	-	O

6 Assessment Findings: Policies

6.1 Introduction

6.1.1 The 16 policies from the Brailes pre-submission NDP have been individually assessed against each of the 13 SEA Objectives. This chapter contains the results of these assessments. The results for each policy can be found in a single line matrix, which displays whether the policy has been assessed positively or negatively against each SEA Objective. The matrices are followed by an explanation of the results.

6.2 Policy NE1: Managing Local Water Environment and Flood Risk

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
O	O	+	++	+	+	+	O	O	O	+	+	+

6.2.1 This policy focuses on flood management and is considered likely to have a positive impact on several SEA Objectives. Overall there is likely to be a positive effect on environmental objectives, as the policy approach will help to reduce the risk of flooding and the risk to property and people. The primary positive impact is anticipated for the flooding Objective, as this policy refers to use of site-specific flood risk assessments, implementing SuDS and appropriate design to minimise flood risk.

6.2.2 This policy is also anticipated to have a positive impact on the economy through preventing flood damage and encouraging sustainable economic growth in Brailes. Biodiversity is also likely to be positively affected through better management of waterways and a reduction in the frequency of flooding events. There is likely to be a positive effect on ensuring decent homes are provided away from areas of high flood risk and on enhancing accessibility and facilities through reducing flood risk and preventing risk to human health and well-being.

6.3 Policy NE2: Designated Local Green Spaces

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
+	+	+	○	○	+	+	○	○	○	○	+	○

6.3.1 This policy is aimed at avoiding and/or minimising development in designated local green spaces. Retention of green spaces is also likely to have a positive impact on the health and wellbeing of existing and prospective residents of Brailes. The landscape character of the area is also anticipated to be positively affected through retaining local green spaces.

6.4 Policy NE3: Protecting Green Fingers and Corridors

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
○	++	++	○	+	+	+	○	○	○	○	+	○

6.4.1 This policy is anticipated to have a positive impact on the biodiversity Objective through retaining areas of increased biodiversity and habitat connectivity in the local area. Landscape character is also likely to be greatly enhanced through retaining the views currently enabled by green fingers and corridors. Benefits to the health and wellbeing of residents are also anticipated through access to local green spaces.

6.5 Policy NE4: Maintaining Edge-of-Settlement Views

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
○	++	○	○	○	○	○	○	○	○	○	+	○

6.5.1 This policy is of a limited nature, but is anticipated to primarily improve the landscape character of the area through ensuring design practices are consistent with the existing built form in the area. Benefits to the health and wellbeing of residents are also anticipated through access to high quality open spaces.

6.6 Policy NE5: Nature Conservation

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
○	+	++	○	○	○	○	○	○	○	○	+	○

6.6.1 This policy mainly focused at protecting and enhancing biodiversity, therefore the main positive impact is to the biodiversity Objective. A further positive impact is anticipated to be seen on the landscape Objective through maintaining existing and creating new green spaces associated with high biodiversity. Increased biodiversity achieved through habitat maintenance and creation is also likely to have a positive impact on human health and wellbeing through access to a wider range of natural environments.

6.7 Policy NE6: Promoting Local Renewable and Low Carbon Energy

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
○	○	○	○	++	+	++	+	○	○	○	○	+

6.7.1 This policy is anticipated to have a positive impact on several environmental objectives by promoting energy efficiency and the local production of energy. The effect of reduced carbon emissions and will be positive for the climate change Objective, in addition to leading to the reduced consumption of resources and reduction in pollution.

6.8 Policy NE7: Retaining Dark Skies

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
+	++	+	○	○	○	++	○	○	○	○	○	○

6.8.1 This policy is anticipated to increase the tranquility of the local area and reduce the adverse impacts of development on the setting of cultural assets. Reduction of light pollution may also have a positive impact on biodiversity within the local area.

6.9 Policy H1: Maintaining Local Character

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
++	++	+	○	○	○	○	○	○	○	+	+	○

6.9.1 This policy is anticipated to have a positive impact on the landscape character and cultural heritage of the local area by adhering to the guidelines within Brailes Village Design Statement (1998), in addition to further development guidelines. Incorporation of sufficient trees, shrubs and greens spaces are also anticipated to have a positive impact on the health and wellbeing of residents and local biodiversity.

6.10 Policy H2: Managing the Built Up Area Boundary

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
+	+	+	○	+	+	+	+	○	○	++	○	○

6.10.1 This policy refers to the provision of new dwellings within the BUAB. This policy seeks to ensure developments are on a small scale which is anticipated to be beneficial for several other SEA Objectives.

6.11 Policy H3: Meeting Future Housing Needs of SDC Core Strategy

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
○	+	○	○	○	+	○	○	○	○	++	○	○

6.11.1 This policy will have a positive impact on the housing Objective by meeting the housing needs of the local area. Further, this policy is also anticipated to have a positive impact on landscape character and natural resources through ensuring development occurs on a small scale.

6.12 Policy H4: Meeting Local Affordable Housing Needs

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
++	++	○	○	○	○	○	○	○	+	++	○	○

6.12.1 This policy identifies the intention for a small scale of development and provision of affordable housing, thus making affordable housing in rural areas more accessible. This policy also highlights specific design requirements to protect the setting of Castle Hill, having a positive impact on cultural heritage, and for development to be designed appropriately in areas of high landscape sensitivity.

6.13 Policy H5: Re-Using Previously Developed (Brownfield) Land and Buildings

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
+	+	+	+	○	++	+	○	○	○	○	+	○

6.13.1 This policy is anticipated to have a positive impact on the natural resources Objective through utilising PDL and, therefore, retaining greenfield space within the area. Further to this, the use of PDL for development is likely to have positive effects on the landscape character, cultural heritage and biodiversity of the area through minimizing development in previously undeveloped areas. Flooding may have a small positive impact through reducing the amount of new hardstanding in the area, whilst the health and wellbeing of residents will be positively affected through retaining more green space.

6.14 Policy E1: Encouraging Sustainable Economic Development

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
○	○	○	○	○	○	○	○	○	+	○	○	++

6.14.1 By encouraging developments which lead to increased employment opportunities in the area and the retention of current employment sites, this policy is anticipated to have a positive impact on the economy Objective. This is also likely to improve accessibility by reducing centralization of employment on a regional scale.

6.15 Policy E2: Re-Use of Redundant Agricultural Buildings

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
○	+	○	○	+	++	○	+	○	○	○	○	○

6.15.1 This policy advocates the responsible development of existing farm buildings and therefore is likely to have a positive impact on the natural resources and cultural heritage Objectives. Retaining the character of these buildings is also anticipated to have a positive impact on the landscape character of the area. Encouraging the re-use and recycling of materials will also reduce the waste produced during the construction of a new development.

6.16 Policy E3: Improving Access to Communications

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
○	○	○	○	+	○	+	○	+	+	○	○	++

6.16.1 This policy is likely to have a positive impact on the local economy by allowing residents to work from home. This impact will also reduce personal car use, positively impacting the climate change, pollution, transport and accessibility Objectives.

6.17 Policy E4: More Opportunities for Home Working

SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
O	O	O	O	+	O	+	O	+	+	O	O	++

6.17.1 This policy is anticipated to positively impact the local economy by allowing residents to work from home. This impact will also reduce personal car use, positively impacting the climate change, pollution, transport and accessibility Objectives. This policy is aligned with the existing high number of businesses being run from home within Brailes⁸⁵.

⁸⁵ Brailes pre-submission Neighbourhood Development Plan (2017)

6.18 Summary of site assessment scores

6.18.1 **Table 6.1** summarises the assessment scores for all policies.

Table 6.1: SEA Objective scoring matrix for all policies

	SEA1	SEA2	SEA3	SEA4	SEA5	SEA6	SEA7	SEA8	SEA9	SEA10	SEA11	SEA12	SEA13
	Cultural Heritage	Landscape	Biodiversity and Geodiversity	Flooding	Climate Change	Natural Resources	Pollution	Waste	Transport	Accessibility	Housing	Health, safety and wellbeing	Economy
NE1	○	○	+	++	+	+	+	○	○	○	+	+	+
NE2	+	+	+	○	○	+	+	○	○	○	○	+	○
NE3	○	++	++	○	+	+	+	○	○	○	○	+	○
NE4	○	++	○	○	○	○	○	○	○	○	○	+	○
NE5	○	+	++	○	○	○	○	○	○	○	○	+	○
NE6	○	○	○	○	++	+	++	+	○	○	○	○	+
NE7	+	++	+	○	○	○	++	○	○	○	○	○	○
H1	++	++	+	○	○	○	○	○	○	○	+	+	○
H2	+	+	+	○	+	+	+	+	○	○	++	○	○
H3	○	+	○	○	○	+	○	○	○	○	++	○	○
H4	++	++	○	○	○	○	○	○	○	+	++	○	○
H5	+	+	+	+	○	++	+	○	○	○	○	+	○
E1	○	○	○	○	○	○	○	○	○	+	○	○	++
E2	○	+	○	○	+	++	○	+	○	○	○	○	○
E3	○	○	○	○	+	○	+	○	+	+	○	○	++
E4	○	○	○	○	+	○	+	○	+	+	○	○	++

7 Significant & Cumulative Effects and Recommendations

Introduction

7.1.1 The following chapter offers mitigation strategies and recommendations for each SEA Objective for the design of prospective developments at the four preferred options. No significant negative or uncertain effects were identified from the assessments of the policies in **Chapter 6**, because the policies are generally aspirational and are designed to help Brailes achieve the visions and objectives within the NDP.

7.1.2 The following chapter will also discuss the likely significant effects of the NDP, as identified during the assessment of the sites in **Chapter 4** and **Chapter 5**. Annex I (f) of the SEA Directive states:

“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.”

7.1.3 Likely significant effects for these factors are presented by SEA Objective. Likely significant effects can potentially arise as a result of the policies and sites acting individually as well as in-combination. Cumulative impacts are therefore taken into account also.

Mitigation

7.1.4 Following the narrative on significant effects by SEA Objective, recommendations are made for measures which would be likely to help avoid, mitigate or compensate the adverse impacts.

7.1.5 The mitigation hierarchy is a sequential process that operates in the following way: firstly, if possible, adverse effects should be avoided. Failing this, the nature of the effect should be reduced, if possible, so that it is no longer significant. If neither avoidance nor reduction is feasible, mitigation measures should be considered. Mitigation prescriptions might include changes to policy wording, advocating design guides, offsetting biodiversity effects or provision of new supporting GI.

7.1.6 In some instances, site-specific recommendations are made. This is not to suggest that mitigation recommendations are only relevant to these sites, but to highlight some cases where this mitigation may be most relevant. Mitigation strategies should be explored in full during the design of all developments.

Significant and Cumulative Impacts for Cultural Heritage

- 7.1.7 All of the preferred options performed negatively for cultural heritage. This is due to a combination of cultural and archaeological assets likely to be adversely affected by development.
- 7.1.8 The most significant negative effect is anticipated to be at Site 2, where an adverse impact to the setting and archaeological remnants associated with Castle Hill resulted in a double negative score. Development at the remaining sites is likely to result in loss of ridge and furrow or within an area of a former medieval settlement, seen to be less significant adverse impacts.
- 7.1.9 Cumulative impacts of development at the preferred options are not anticipated to be significant. The sites are small and well dispersed throughout the village to avoid adverse impacts to the overall sense of place and local distinctiveness of the area.

Mitigation Recommendations for Cultural Heritage

- 7.1.10 Loss of archaeological features is an irreversible adverse effect, therefore assessment and necessary excavation of features prior to development should be carefully documented and added to the local historic record. This is especially relevant to:
- Site 2, due to positioning close to Castle Hill SM meaning buried archaeological remnants may be present; and
 - Site 4, due to the site being located within a former medieval settlement.
- 7.1.11 Where there is potential for development to adversely affect a heritage asset, an assessment should be undertaken to establish the extent of this potential effect as per guidelines provided by Historic England⁸⁶. This is especially relevant to:
- Site 2, due to positioning close to Castle Hill SM.
- 7.1.12 Where possible development should consider sensitive design around existing cultural assets and maintain the setting of such assets, including the use of screening. Screening should consist of naturally occurring tree and hedge species which retain year-round foliage. Guidelines for species selection and conditions for screening foliage are provided by the Royal Horticultural Society⁸⁷. This is especially relevant to:
- Site 2, due to positioning close to Castle Hill SM.

⁸⁶ Historic England (2015) The Setting of Heritage Assets - Historic Environment Good Practice Advice in Planning: 3. Available at: <https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/>

⁸⁷ Royal Horticultural Society (2017) Plants for Screening. Available at: <https://www.rhs.org.uk/advice/profile?PID=636>

7.1.13 In order to benefit the cultural heritage of the area, development should improve access to, and increase the local awareness of, important cultural assets in the area.

Significant and Cumulative Impacts for Landscape

7.1.14 The most significant negative impact is anticipated to be at Site 2, where an adverse impact to the setting and views from Castle Hill resulted in a double negative score. Development at Site 4 is also deemed to have a significant impact due to adverse effects to views from the adjacent public footpaths.

7.1.15 Although the sites are small and well dispersed throughout the village, cumulative impacts of development at the preferred options are anticipated to have a greater adverse impact on the landscape. This is largely due to impacts on views from and within the Cotswolds AONB and to a greater loss of tranquility in the area.

Mitigation Recommendations for Landscape

7.1.16 Where possible, development should incorporate mitigation through careful design including planting strategies. Retention and incorporation of principle landscape elements (identified within the Cotswolds AONB Management Plan⁸⁸) such as dry stone walls and hedges is likely to aid this.

7.1.17 New developments should seek to incorporate new planting schemes or landscape buffers into the development design for screening purposes, in keeping with the local character. Screening buffers should comprise local indigenous species that will maintain their foliage throughout the year (e.g. species that do not lose foliage over the winter months). This is especially relevant to:

- The tree line at the western perimeter of Site 1 which provides limited screening from Sutton Lane. The landscape character of the area may be better maintained through improving this tree line; and
- The field in which site 2 is situated has no natural existing boundary between the proposed development at the existing landscape. The addition of boundary, such as a tree line, may allow the landscape character of the area to be better maintained.

7.1.18 Where feasible, it is recommended that developers are encouraged to employ techniques that help integrate new developments into the surrounding landscape. Techniques could include earth mounding, ha-ha walls or sourcing local materials for construction.

7.1.19 Use of PDL and existing buildings is recommended in order to have the least disruptive effect on the local landscape.

⁸⁸ Cotswolds AONB Management Plan 2013-2018 (2013)

7.1.20 In general, lower density housing developments are anticipated to have a reduced negative impact on the surrounding landscape character, therefore this is recommended.

7.1.21 Retention and incorporation of GI is recommended in order to minimise the adverse effects of development of the landscape character of the area.

Significant and Cumulative Impacts for Biodiversity and Geodiversity

7.1.22 With the revised boundaries following site selection, all sites are anticipated to have a negligible overall impact on biodiversity. This is because development is anticipated to avoid areas and habitats of the highest biodiversity value. Significant impacts to ecosystem services, or regarding loss of habitat or connectivity of habitat are not expected. Development may, therefore, be able to achieve a net gain in biodiversity, subject to appropriate design and layout of new developments.

7.1.23 Cumulative impacts of development at the preferred options are not anticipated to be significant. The sites are small and well dispersed throughout the village meaning disturbances to nearby habitats area likely to be small and short term overall. More of an indication of biodiversity protection and enhancement could be presented within the policies, giving specific examples and strategies to achieve a net gain in biodiversity.

Mitigation Recommendations for Biodiversity and Geodiversity

7.1.24 Biodiversity within the Brailes area relies on habitat connectivity throughout the wider region, therefore special consideration should be given to this within planning and design. Retention of the GI network within developments should be designed with the goal of maintaining and improving the habitat connectivity of the wider region.

7.1.25 Woodland connectivity is low in parts of the Brailes area⁸⁹, this could be improved through the addition of connecting woodland fragments within developments. All sites have areas of woodland in close proximity which may benefit from improved connectivity.

7.1.26 Development should be in line with Natural England's 'Access to Natural Greenspace Standard'⁹⁰, which sets recommended distances to greenspaces within the local area. These standards aim to improve access to greenspaces and connectivity of greenspaces.

⁸⁹ The Habitat Biodiversity Audit and Warwickshire County Council (2010) Stratford-on-Avon District Ecological and Geological Assessment.

⁹⁰ Natural England (2010) Access to Natural Greenspace Standard

7.1.27 Where possible, removal of existing linear features such as woodland, hedgerows, tree lines and aquatic networks should be avoided, with the aim of including new features within the development also. This is especially relevant to:

- The hedges at the western and northern perimeters of Site 1; and
- The trees at the eastern perimeter and hedge and the southern perimeter of Site 2; and
- The woodland area at the northern perimeter of Site 3; and
- The woodland area at the northern perimeter of Site 4.

Significant and Cumulative Impacts for Flooding

7.1.28 The most significant negative effect is anticipated to be at Site 2, where the surrounding topography results in the area being associated with a high risk of surface water/fluviial flooding. The revised boundary for Site 4 has resulted in the areas at highest risk of surface water flooding being avoided, however some areas at low risk remain within this preferred option. The remaining sites are anticipated to be at low risk of flooding overall.

7.1.29 Cumulative impacts of development at the preferred options are not anticipated to be significant. The increase in developed land and hardstanding is not anticipated to have a significant effect on surface water run off in the area due to the small scale of the proposed developments.

Mitigation Recommendations for Flooding

7.1.30 In order to avoid the problems associated with development in high flood risk areas, undertaking Sequential Flood Risk Assessments and Exception Tests for proposed sites is required. PPG on flood risk should be adhered to in such cases.

7.1.31 Where development in an area at high risk of any kind of flooding is unavoidable, mitigation should involve implementing sustainable urban drainage systems (SuDS)⁹¹ and/or GI features such as attenuation and balancing ponds⁹². GI features can also slow surface water runoff and increase absorption of floodwater.

⁹¹ Construction Industry Research and Information Association (2007) Sustainable Urban Drainage System Manual

⁹² Construction Industry Research and Information Association (2014) Using green infrastructure and nature to manage flood risk

7.1.32 The contribution of agricultural land to surface water flooding in the area could be reduced through use of the Department for Environment, Food and Rural Affairs (DEFRA) Environmental Stewardship Scheme (ESS)⁹³. This involves minor changes to land management which reduce surface water run-off, in addition to reducing water pollution levels caused by agriculture. This is especially relevant to:

- Site 2, as this site has agricultural fields in the surrounding area and has a medium to high risk of surface water flooding.

Significant and Cumulative Impacts for Climate Change

7.1.33 All sites scored negatively for climate change, but none significantly. Negative scores were given due to the high anticipated reliance on personal car use by prospective residents. Further to this, development at all sites is anticipated to result in the loss of GI, which results in a loss of natural air filtering and carbon sink qualities of the local vegetation. The increased energy consumption and GHG emissions of developed sites over their current uses also contributes to the negative scores seen for climate change. With a maximum of six dwellings per site, these contributions were not deemed to be significant.

7.1.34 Cumulative impacts of development at the preferred options will result in a greater overall contribution of GHG and greater negative contribution towards mitigating the causes of climate change. The addition of 24 dwellings to the Brailes area is still not seen to be a significant impact, however. A greater indication of the strategies intended to be employed for mitigating the causes of climate change could be offered within the policies.

Mitigation Recommendations for Climate Change

7.1.35 To promote the natural air filtering qualities and carbon sink function of local vegetation, the retention of existing GI and incorporation of this into the development where possible is recommended.

7.1.36 Development should aim to support renewable energy technologies, such inclusion of (or capability for) solar panels, with south facing roofs to maximise efficiency.

⁹³ DEFRA (2015) Environmental Stewardship: guidance and forms for agreement holders

7.1.37 Reducing reliance on personal car use is very important in order to improve the contribution of the local area towards climate change mitigation. This can be achieved through improving public transport accessibility for residents, including schoolchildren travelling outside of the village. A further way to reduce personal car use is provision of amenities and services within the local area. Although these recommendations may be beyond the means of the NDP, they should be considered.

7.1.38 A small amount of climate change mitigation can be achieved through promoting home-grown food. This reduces the carbon footprint of food consumed in a number of different ways⁹⁴.

Significant and Cumulative Impacts for Natural Resources

7.1.39 All sites scored negatively for natural resources, but none significantly. Negative scores were given due to all sites currently being largely undeveloped green field sites. Current uses of sites include agriculture purposes and use as paddocks. All sites are thought to be located on land with moderate agricultural value (ALC Grade 3), therefore development is not seen to be an efficient use of the region's natural resources.

7.1.40 Cumulative impacts of development at the preferred options will result in a greater proportion of the undeveloped land in the area being developed. Despite this, the combined areas of developed land are still not seen to be a significant loss of natural resources.

Mitigation recommendations for Natural Resources

7.1.41 Wherever possible development should utilise PDL and existing buildings for development.

7.1.42 Wherever possible construction should take place with re-used or recycled materials.

7.1.43 A reduced amount of greenfield land, including agricultural land, will be lost to development with an increased housing density, although this should not compromise efforts to reduce the negative impact on landscape character.

⁹⁴ Ceren Hiç, Prajal Pradhan, Diego Rybski, and Jürgen P. Kropp (2016) Food Surplus and Its Climate Burdens. Available at: <http://pubs.acs.org/doi/abs/10.1021/acs.est.5b05088>

Significant and Cumulative Impacts for Pollution

7.1.44 All sites were scored as negligible for pollution, with no historical pollution events or known air or water quality issues in the Brailes area. The small scale of development is likely to result in small increases in the amounts of air, noise and light pollution in localised areas around Brailes, these increases were seen to be negligible for the proposed developments of a maximum of six dwellings per site.

7.1.45 Cumulative impacts of development at the preferred options will result in greater air, noise and light pollution. An anticipated increase in at least 28 cars (derived UK average of 1.2 cars per household⁹⁵), and an expected high reliance on personal car use will result in an increased contribution of GHG and release of other pollutants.

Mitigation recommendations for Pollution

7.1.46 Employment of water quality mitigation methods including SuDS, ESS and water flood attenuation schemes is advised.

7.1.47 Retain existing GI and incorporate this into the development where possible.

7.1.48 Screening of roads with appropriate vegetation is advised as this can lead to a reduction in the spreading of air pollution. This should be conducted in-line with the Forest Research 'Improving Air Quality' guidelines⁹⁶. This is especially relevant to:

- Site 1, screening from Sutton Lane; and
- Site 2, screening from Castle Hill Lane.

Significant and Cumulative Impacts for Waste

7.1.49 All sites were scored as negligible for waste. The anticipated increase in waste from an additional six dwellings was seen as not likely to have a significant impact on the overall waste production of the area.

7.1.50 Cumulative impacts of development at the preferred options will result in greater waste production in the Brailes area. It is not currently known whether the current waste management streams have the capacity to cope with the increased amount of waste, although at this small scale of development it is anticipated that the increased amount of waste will not be significant.

⁹⁵ Office for National Statistics (2011)

⁹⁶ Forest Research (2006) Improving Air Quality

Mitigation Recommendations for Waste

- 7.1.51 Where economically and environmentally practical, development should promote re-use of locally sourced and/or recycled materials, and high quality recycling facilities.
- 7.1.52 Design proposals facilitating management of waste higher up the waste hierarchy is recommended, such as favouring prevention, minimisation, reuse and recycling of waste, with energy recovery and disposal seen as less favourable.
- 7.1.53 Provision of areas within gardens and/or developments for home-grown food would reduce food waste.

Significant and Cumulative Impacts for Transport and Accessibility

- 7.1.54 All sites were scored as significantly negative for transport and accessibility. Due to the lack of amenities and service within Brailes and the infrequency of sustainable transport services, a high reliance on personal car use is anticipated by prospective residents. The PRoW network is good within Brailes, allowing walking for journeys within the parish, however personal car use is likely to be the preferred mode of transport for journeys to outside of the Brailes area.
- 7.1.55 Cumulative impacts of development at the preferred options will result in an increased number of cars in the area, this is not likely to have a significant impact on traffic in the local area.

Mitigation Recommendations for Transport and Accessibility

- 7.1.56 Where possible, development should look to improve the current sustainable transport network and encourage behavioral change to encourage the use of sustainable transport through providing proximal and accessible facilities and making services more frequent.
- 7.1.57 Measures to promote cycling use would include an increase in bike lanes, incorporation of secure bike stores within developments and the employment of free/discounted bike schemes⁹⁷.

Significant and Cumulative Impacts for Housing

- 7.1.58 All sites were scored positively for housing, with each site likely to provide six dwellings. At each site, two of these dwellings are likely to be affordable.
- 7.1.59 Cumulative impacts of development at the preferred options will result in an overall contribution of 24 dwellings, eight of which will be affordable.

⁹⁷ Planning Resource (2017) 'Healthy New Towns' winner includes free bike obligation on developers <http://www.planningresource.co.uk/article/1442639/healthy-new-towns-winner-includes-free-bike-obligation-developers>

Mitigation Recommendations for Housing

- 7.1.60 New homes should also be designed to meet Government targets of zero carbon emissions through inclusion of renewable energy generation methods (e.g. solar panels), use of recycled and/or reclaimed materials and the use of high energy performance materials.
- 7.1.61 Careful consideration should be given to density, design and future proofing in terms of climate change and potential expansion.
- 7.1.62 Housing development could better contribute to the local distinctiveness and character of the Brailes area by ensuring design is consistent with existing properties. Consulting existing residents on the design of developments is also likely to aid this.

Significant and Cumulative Impacts for Health, Safety and Wellbeing

- 7.1.63 All sites were scored negatively for health, safety and wellbeing, but none significantly. Negative scores were given due to the distance from health services such as a GP and A&E, with travel times to these services by sustainable transport means seen as not sustainable. The PRoW network around the site offers good access to the countryside, with playing fields and allotments within a sustainable distance of the majority of the sites, encouraging a healthy and active lifestyle.
- 7.1.64 Cumulative impacts of development at the preferred options will not result in any impact to the health, safety and wellbeing of residents.

Mitigation Recommendations for Health, Safety and Wellbeing

- 7.1.65 Availability and access to high quality green spaces is beneficial for both physical and mental health⁹⁸. Provision of local green space should meet Natural England's 'Access to Natural Greenspace Standard'⁹⁹.
- 7.1.66 Increasing physical activity of residents can be achieved through measures to promote cycling. This may include an increase in bike lanes, incorporation of secure bike stores within developments and the employment of free/discounted bike schemes¹⁰⁰.

⁹⁸ Baron and Pretty (2010) What is the Best Dose of Nature and Green Exercise for Improving Mental Health? A Multi-Study Analysis, *Environmental Science Technology*, 44 (10), pp 3947-3955.

⁹⁹ Natural England (2010) Access to Natural Greenspace Standard

¹⁰⁰ Planning Resource (2017) 'Healthy New Towns' winner includes free bike obligation on developers <http://www.planningresource.co.uk/article/1442639/healthy-new-towns-winner-includes-free-bike-obligation-developers>

- 7.1.67 Certain settlement design features, such as adventure areas, safe walking and cycling routes to schools, are able to promote a healthy lifestyle, especially amongst children¹⁰¹. These measures encourage increased physical activity.
- 7.1.68 It is recommended that green spaces are highly accessible, safe, functional, have a high biodiversity value and are of a high quality. This is could include water features, benches and paths and it is to help ensure that the green spaces are popular social spaces where residents can meet.

¹⁰¹ Tom Morgan (2017) Theme parks can inspire new towns to beat childhood obesity, says NHS boss Simon Stevens. Available at: <http://www.telegraph.co.uk/news/health/elder/12178462/Theme-parks-can-inspire-new-towns-to-beat-childhood-obesity-says-NHS-boss-Simon-Stevens.html>

Significant and Cumulative Impacts for Economy

7.1.69 The majority of sites were scored as negligible for their impact on the local economy, with Site 2 scored negatively as it is currently used for agricultural purposes. There is no employment space is anticipated to be included within developments at the sites.

7.1.70 Cumulative impacts of development at the preferred options is likely to result in more residents working from home. This is anticipated to have a positive impact on the local economy.

Mitigation Recommendations for Economy

7.1.71 Improving sustainable transport services would be likely to boost the local economy.

8 Monitoring

8.1 Monitoring proposals

- 8.1.1 The SEA Directive states that ‘member states shall monitor the significant environmental effects of the implementation of plans and programmes... in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action’ (Article 10.1). In addition, the Environmental Report should provide information on a ‘description of the measures envisaged concerning monitoring’ (Annex I (i)). This represents Stage E of SA, according to the DCLG (2015) Guidance on SEA for Neighbourhood Plans.
- 8.1.2 The monitoring requirements typically associated with the SEA process are recognised as placing heavy demands on authorities with SEA responsibilities. For this reason, the proposed monitoring framework should focus on those aspects of the environment that are likely to be negatively impacted upon, where the impact is uncertain or where particular opportunities for improvement might arise.
- 8.1.3 The purpose of monitoring is to measure the environmental effects of a plan, as well as to measure success against the plan’s objectives. It is therefore beneficial if the monitoring strategy builds on monitoring systems that are already in place. It should also be noted that monitoring could provide useful information for future plans and programmes.
- 8.1.4 The SEA process has identified some areas that would benefit from ongoing monitoring. The areas specified for monitoring include:
- Flooding events;
 - Levels of public transport patronage;
 - Air pollution levels; and
 - Groundwater pollution levels.
- 8.1.5 Monitoring is particularly useful in answering the following questions:
- Were the assessment’s predictions of sustainability effects accurate?
 - Does the Core Strategy contribute to the achievement of desired sustainability objectives?
 - Are mitigation measures performing as well as expected?
 - Are there any unforeseen adverse effects? Are these within acceptable limits, or is remedial action required?

- 8.1.6 The SEA guidance suggests that SEA monitoring and reporting activities can be integrated into the regular planning cycle. As part of the monitoring process, Stratford-on-Avon District Council will be required to prepare Annual Monitoring Reports. It is anticipated that elements of the SEA monitoring programme for the Core Strategy could be incorporated into these processes.
- 8.1.7 Details of any monitoring programme are, at this stage, preliminary and may evolve over time based on the results of consultation and the identification of additional data sources (as in some cases information will be provided by outside bodies). The monitoring of individual schemes/proposals should also be addressed at project level.

9 Conclusions and Next Steps

9.1 Best Performing Option

9.1.1 The four preferred options are generally seen to be some of the best performing sites of those assessed, especially when the revised site boundaries are considered. The Brailes area has a relatively high sensitivity to housing development, especially in terms of landscape character, cultural heritage and flood risk. The assessment scores for Sites 1, 3 and 4, therefore, reveal that these locations are likely to be the most appropriate sites for development. The assessment scores for Site 2, however, are comparatively worse (See **Table 5.1**). Development at this site is anticipated to have adverse impacts to landscape and cultural heritage, in addition to having a high risk of surface water flooding in a small region of the preferred option. Although many of these effects are dependent on more detailed design proposals, this site is seen as less suitable for housing development than the other preferred options.

9.2 Next Steps

9.2.1 This Environmental Report (ER) will be published alongside the pre-submission NDP and a period of consultation will follow, providing the opportunity for individuals, businesses and other organisations to submit representations regarding the ER.

9.2.2 The Submission Version NDP will be submitted to the local planning authority, Stratford-on-Avon District Council. Once the District Council is satisfied that the NDP complies with all statutory requirements, it will be published for consultation for a minimum of six weeks, in particular inviting representations from any consultation body referred to in the consultation statement. The Neighbourhood Plan will also be sent to an independent examiner who will test whether or not the plan meets the basic conditions¹⁰².

9.2.3 Formal representations made through the consultation process will be submitted to the Examiner of Neighbourhood Plans alongside the draft NDP and this SEA Report. This represents Stage D of the SEA, according to the DCLG (2015) guidance. If the examiner of Neighbourhood Plans is satisfied that the basic conditions have been met, the NDP will be subject to local referendum. If over 50% of votes at the referendum are in favour of the NDP, the NDP will become adopted as part of the statutory development plan.

¹⁰² own and Country Planning Act 1990. Available at: <https://www.legislation.gov.uk/ukpga/1990/8/contents>.

9.2.4 SEA Regulations 16.3c) (iii) and 16.4 require that a ‘statement’ be made available to accompany the plan, as soon as possible after the adoption of the plan or programme, known as a post-adoption statement. The purpose of the SEA statement is to outline how the SEA process has influenced and informed the NDP development process and demonstrate how consultation on the SEA has been taken into account.

9.2.5 As the regulations outline, the statement should contain the following information:

- The reasons for choosing the preferred policies for the NDP as adopted in the light of other reasonable alternatives dealt with;
- How environmental considerations have been integrated into the NDP;
- How consultation responses have been taken into account; and
- Measures that are to be taken to monitor the significant environmental effects of the NDP.
- To meet these requirements, following any further changes before adoption, a Post Adoption Statement will be published with the adopted version of the NDP.

9.3 **Commenting on the Environmental Report**

9.3.1 Any comments on this SEA Report should be directed through Stratford-on-Avon District Council.

Appendix A: SA Framework

#	SEA Objective	Decision making criteria: Will the option...		Indicators (this list is not exhaustive)
1	Cultural heritage: Protect, enhance and manage sites, features and areas of archaeological, historical and heritage importance.	Q1a	Will it preserve heritage assets and encourage their conservation and where appropriate enhancement?	Number of Listed Buildings at risk
		Q1b	Will it preserve or enhance archaeological sites?	Number of scheduled monuments at risk of damage
				Number of development proposals informed by archaeological provisions
		Q1c	Will it improve and broaden access to, understanding of and enjoyment of the historic environment?	Annual number of visitors to historic attractions
2	Landscape: Protect, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening distinctiveness and its special qualities.	Q2a	Will it safeguard and enhance the local landscape character and distinctiveness?	Development located in the Green Belt
				Application of Landscape Character Assessments
		Q2b	Will it impact on landscape tranquillity such as by night or noise pollution?	Tranquillity assessments
		Q2c	Will it encourage high quality design that enhances the built and natural environment?	Proportion of development which meets Building or Life standards
		Q2d	Will it be in accordance with the Cotswolds AONB Management Plan and associated guidance?	Retention of principal landscape elements
				Tranquillity assessments
				Land use changes
3	Biodiversity & geodiversity: Protect, enhance and manage the biodiversity and geodiversity.	Q3a	Will it lead to loss of biodiversity?	Extent and condition of priority habitats
				Extent of priority species
				Area and condition of national designated sites in appropriate management
		Q3b	Will it lead to habitat creation?	Area of Nature Conservation designation per 1,000 people
				Extent and condition of key habitats for which Biodiversity Action Plans have been established
Q3c	Will it maintain and enhance national sites designated for	Area of new habitat creation reflecting BAP priorities		
				Number, area and condition of national designated sites

#	SEA Objective	Decision making criteria: Will the option...	Indicators (this list is not exhaustive)
		their biodiversity value?	in appropriate management
		Q3d Will it maintain and enhance sites designated for the geodiversity value?	Area designated for geological interest
		Q3e Will it link up areas of fragmented habitat?	Extent and condition of priority habitats
		Q3f Will it increase awareness of biodiversity and geodiversity assets?	Accessibility improvements to nature reserves Interpretation improvements, such as information boards, for nature reserves and local sites
4	Flooding: Reduce the number of people at risk of flooding.	Q4a Will it help reduce the number of people at risk of fluvial flooding?	Amount of new development (ha) in Flood Zones 3a and 3b Flood mitigation measures to be included
		Q4b Will it help reduce the number of people at risk of surface water flooding?	Number of properties at risk of surface water flooding
		Q4c Will it help limit the likely rise in flood risk in the NDP area caused by climate change?	Planning permissions granted contrary to advice from Environment Agency on flood defence grounds
5	Climate change: Minimise the NDP area's contribution to climate change and plan for anticipated climatic conditions.	Q5a Will it help reduce the NDP area's carbon footprint?	Proportion of electricity renewably sourced Per capita GHG emissions Emissions by source Emissions by sector Personal car ownership and usage
		Q5b Will it help raise awareness of climate change mitigation?	Initiatives that increase awareness of energy efficiency
		Q5c Will it retain existing green infrastructure and promote the expansion of green infrastructure to help facilitate climate change adaptation?	Amount of new greenspace created per capita
		Q5d Will it encourage development of buildings prepared for the impacts of climate change?	Number of planning permission incorporated SUDS Thermal efficiency of new homes
6	Natural resources: Protect and conserve the NDP area's natural resources.	Q6a Will it lead to more efficient use of land?	Housing density
		Q6b Will it lead to reduced consumption of materials and resources?	Proportion of buildings meeting BREEAM Very Good Standard or above
		Q6c Will it lead to the loss of good agricultural land?	Area of Grades 1, 3 and 3a agricultural land lost to development

#	SEA Objective	Decision making criteria: Will the option...		Indicators (this list is not exhaustive)
		Q6d	Will it safeguard the area's mineral resources?	Area of land with potential for minerals sterilized
		Q6e	Will it utilize derelict, degraded and under-used land?	Proportion of dwellings built on previously developed land
7	Pollution: Minimise air, noise, soil, light and water pollution.	Q7a	Will it lead to improved water quality?	Proportion of watercourses classified as good or very good biological and/or chemical quality Change in pollution incidents
		Q7b	Will it lead to improved air quality?	Air Quality Management Areas Number of days when air pollution is elevated
		Q7c	Will it maintain and enhance soil quality?	Area of contaminated land
		Q7d	Will it reduce diffuse pollution to air, water and soil?	Change in pollution incidents
8	Waste: Reduce waste generation and disposal and achieve sustainable management of waste	Q8a	Will it provide facilities for the separation and recycling of waste?	Type and capacity of waste management facilities Household waste and recycled or composted
		Q8b	Will it encourage the use of recycled materials in construction?	Reuse of recycled materials in construction
9	Transport: Increase the efficiency of transport networks and improve access to sustainable modes.	Q9a	Will it reduce the need to travel?	Average distance travelled to work Percentage of residents within 30 minutes travel time to GP, hospital, schools and employment Ease with which residents have access to key services
		Q9b	Will it encourage walking and cycling?	Proportion of people walking and/or cycling
		Q9c	Will it reduce personal car use?	Proportion of people travelling to work via car or van
		Q9d	Will it encourage public transport use?	Proportion of people travelling to work by bus and/or train Number of bus journeys made per annum Number of train journeys made per annum
		Q9e	Will it provide adequate access to a range of sustainable transport methods?	Provision of walking and/or cycling routes Distance between new development and public transport links
10	Accessibility: Reduce barriers for	Q10a	Will it increase provision of local services and facilities and	Ease with which residents have access to key services

#	SEA Objective	Decision making criteria: Will the option...		Indicators (this list is not exhaustive)
	those living in rural areas.		reduce centralization?	
		Q10b	Will it improve accessibility to a range of transport modes to services and facilities from rural locations?	Percentage of rural households within 800m of a frequent bus service (hourly or better)
		Q10c	Will it support the provision of affordable housing in rural locations?	Affordable housing completions in rural locations
11	Housing: Provide environmentally sound and good quality housing for all.	Q11a	Will it ensure that all groups have access to affordable and decent housing?	Affordable housing completions
		Q11b	Will it identify an appropriate supply of land for new housing?	Net additional dwellings for the current year
		Q11c	Will it ensure that new development contributes to local distinctiveness and character?	Number of major housing applications refused on design grounds
				Accessible natural green space
Q11d	Will it meet the building specification guidance in the Code for Sustainable Homes?	Proportion of housing achieving a four star or above in accordance with the Code for Sustainable Homes		
12	Health, safety and wellbeing: Safeguard and improve the safety, health and quality of life in the community.	Q12a	Will it improve access for all to health, leisure and recreational facilities?	Travel time by public transport to nearest health and sports facilities
		Q12b	Will it improve and enhance the district's green infrastructure network?	Proportion of accessible greenspaces per 1,000 population
		Q12c	Will it improve long term health?	Life expectancy at birth
		Q12d	Will it encourage long term healthy lifestyles?	The number of sports pitches available per 1,000 people
		Q12e	Does it consider the needs of the elderly?	Percentage of elderly being treated intensively at home
		Q12f	Will it reduce crime and the fear of crime?	Indices of Multiple Deprivation: Crime domain
		Q12g	Will it reduce deprivation in the district?	Indices of Multiple Deprivation
13	Economy: Develop a dynamic, diverse and knowledge based economy of high value and low impact innovation.	Q13a	Will it ensure that new employment, office, retail and leisure developments are in locations that are accessible to those who will use them by a choice of transport modes?	Proportion of residential development within 30 minutes public transport time of key services
		Q13b	Will it help ensure an adequate supply of employment land?	Area (ha) of new employment land provision
		Q13c	Will it support or encourage new business?	Number of startup businesses in the environmental and social enterprise sector
		Q13d	Will it support the visitor economy?	Visitor numbers

Appendix B: Responses to Scoping Report of Statutory Consultees

Date: 17 August 2017
Our ref: 220690
Your ref: Brailes NDP SEA Scoping Report



Joseph Evans BSc (Hons) MSc CIEEM
Environmental Consultant
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T 0300 060 3900

Dear Mr Evans

Planning consultation: Strategic Environmental Assessment Scoping Report of the Brailes Neighbourhood Development Plan

Thank you for your consultation on the above dated 13 July 2017 which was received by Natural England on 13 July 2017.

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.

Natural England generally welcomes the scoping report for the Brailes Neighbourhood Plan and considers that the methodology and baseline information used to inform the report appears to meet the requirements of the SEA Directive (2001/42/EC) and associated guidance.

Policies, Plans and Programmes

We are satisfied that the national and local plans and strategies identified within the report are relevant to the neighbourhood plan.

Sustainability Framework

Natural England generally supports the sustainability objectives contained within the framework, however with regards to the landscape we would like to make the following comments.

We would advise the following criteria to be added to the list of questions in section 2 of SEA Objectives referring to protection, enhancement and management of the character and appearance of the landscape: "*Development within and affecting the Cotswolds AONB should be in accordance with the Cotswolds AONB Management Plan and associated guidance.*"

The reason for this is that the AONB has the highest level of protection of landscape and scenic beauty. The statutory Cotswolds AONB Management Plan has been endorsed by Stratford upon Avon District Council as guidance for development management purposes. The Management Plan policies are amplified by Landscape Strategy and Guidelines, and Position Statements published by the Cotswolds Conservation Board. Together these documents should be referred to within the plan.

The Management Plan can be downloaded at <http://www.cotswoldsaonb.org.uk/planning-management-advice/management-plan/>

We refer you to the attached annex which covers the issues and opportunities relevant to neighbourhood plans which may be helpful to you.

For any queries relating to the specific advice in this letter only please contact Yana Burlachka on 02082256013. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Yana Burlachka
Land use planning adviser
Sustainable Development Team – West Midlands



Historic England

WEST MIDLANDS OFFICE

Mr Joseph Evans
6887

Direct Dial: 0121 625

Lepus Consulting Ltd

1 Bath Street
PL00130862

Our ref:

Cheltenham

GL50 1YE
2017

28 July

Dear Mr Evans

SEA SCOPING REPORT OF THE BRAILES NEIGHBOURHOOD PLAN

Regarding the SEA Scoping Report Historic England commends the approach taken. We consider the document generally conforms well to national guidance on SEA preparation. The report is carefully detailed and suitably proportionate and covers a suitably wide range of areas and topics. It includes a good appreciation of the Historic Environment and consideration of the range of Heritage Assets that may be susceptible to future impacts. We consider that the SEA Framework set out in Appendix A will in due course allow for the successful mitigation of those impacts. We do have some minor comments that you may like to take into account. Regarding the historic environment baseline data for the SEA it is not apparent that this has benefitted from direct input from the County Council Historic Environment Team (Ben Wallace is the HER Manager). Comprehensive data on Heritage Assets in the Neighbourhood area will be available from the Warwickshire Historic Environment Record held by the County Council. They also hold, for example, Historic Environment Character Assessments based on a county-wide Historic Landscape Characterisation. The County HER should also be referenced in section 10.2.6 of the report as being the principal repository of information on undesignated heritage assets. Finally, under SEA Objective 1, Cultural heritage, Q1a, we would suggest the wording be amended to read "Will it preserve heritage assets and encourage their conservation and where appropriate enhancement".

I hope you find these comments helpful.

Yours sincerely,



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TG

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Historic England

WEST MIDLANDS OFFICE

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Historic England is subject to the Freedom of Information Act, 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.

Lepus Consulting
1 Bath Street
Cheltenham
Gloucs
GL50 1YE

Our ref: UT/2007/101490/SE-
18/SP1-L01

Your ref:

Date: 07 September 2017

Dear Sir,

Strategic Environmental Assessment Scoping Report of the Brailes and Winderton Neighbourhood Development Plan

Thank you for consulting us on this document. The document overall is thorough in its' analysis and scope. However, we would like to make the following comments to improve it further.

Flooding 6.2.4

Although it is in a sense true that there is a relatively small area at fluvial flood risk, it is slightly misleading because the watercourse does flood right through the middle of Lower Brailes and affects many properties. This is understood to be a combination of surface water flooding from the fairly steep surrounding catchment and the watercourse that runs through it. There may be scope to improve the understanding and flood risk modelling in the area and subsequently implement mitigation measures, through the process of the Neighbourhood Plan which at present is only covered by indicative modelling.

SEA Framework

In relation to the objective of Flooding, compliance with the Q4a Indicator would not reduce the number of people at risk, it would only not increase the number at risk. Reducing the number of people at risk could only be achieved through planning where are the large enough sites in the flood plain, (this is unlikely for a lower category village such as this) or flood mitigation measures such as flood storage areas or widening of channels/enlarging of bridge structures.

Appendix B

Soil, water and air, the River Basin Management Plan should be the Severn River Basin District. The listed CAMS documents are also incorrect. Both the Tame, Anker and Mease and the Worcestershire Middle Severn Catchment Abstraction Management Strategies are referred to. The area falls within the Warwickshire Avon Abstraction Licensing Strategy area. However, although the main Brailes villages has a watercourse that flows towards the Stour, Avon and ultimately Severn, if it is correct that the very

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9, Sentinel House Wellington Crescent, Fradley Park, Lichfield, WS13 8RR.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

Cont/d..

South Eastern corner of the parish falls under Thames Water, as mentioned in the document, there is a chance that a small part of the catchment flows that way so could also include the Thames catchment; you may wish to check this.

In addition to the NPPF, the Planning Practice Guide (PPG) provides extra guidance on the brief NPPF. From our point of view, there is lots of useful advice on flood risk, water quality, habitats pollution and groundwater protection. This should be referred to within the Appendices.

Yours faithfully

Mr Martin Ross
Senior Planning Advisor

Direct dial 020 3025 3055

Direct e-mail martin.ross@environment-agency.gov.uk

Ecological Services

Green Infrastructure

Landscape and Visual Impact Assessment

Landscape Character Assessment

Habitats Regulations Assessment

Strategic Environmental Assessment

Sustainability Appraisal



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