

# Strategic Environmental Assessment of the Brailes Neighbourhood Plan

## Environmental Report

September 2018



**LEPUS** CONSULTING  
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

# Strategic Environmental Assessment of the Brailes Neighbourhood Plan

## Environmental Report

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# About this report & Notes for readers

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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 2018 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).

Comments on this report can be sent to Stratford-on-Avon District Council using the following address.

Elizabeth House  
Church Street  
Stratford-upon-Avon  
Warwickshire  
CV37 6HX

Telephone: 01789 267575

E-mail: [info@stratford-dc.gov.uk](mailto:info@stratford-dc.gov.uk)

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# Acronyms

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

# Non-Technical Summary

## What is Strategic Environmental Assessment?

**N1** Lepus Consulting has prepared this Strategic Environmental Assessment (SEA) Environmental Report of the Brailes 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 assessment<sup>1</sup> of the Brailes NDP in June 2017 to determine whether the NDP should undergo SEA. This assessment determined that the NDP had the potential have likely significant effects on the environment because of potential impacts on 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 (AONB), in addition to the range of historical and cultural heritage assets prevalent throughout the local area, could potentially result in significant adverse effects on the local environment.

## The scoping stage

**N7** The first stage of the SEA was to prepare a Scoping Report<sup>2</sup>. 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** 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

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

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

sites and through the Stratford-on-Avon District Core Strategy 2011 – 2031. Each reasonable alternative site has been appraised in this report.

## 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**.
- N10** The NDP presents the preferred approach, which includes three sites allocated for residential development. The NDP group are pursuing this approach based on the various findings and documents comprising their evidence base. The preferred approach which is proposed in the NDP has been appraised in **Chapter 5**. This appraisal is followed by a cumulative effects assessment with recommendations made for avoidance or mitigation schemes where appropriate.

## 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 effects 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** The SEA has identified both positive and negative sustainability impacts caused by the NDP (see **Tables N1** and **N2**). 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 minor adverse effects associated with:

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

## Next Steps

**N14** 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 Act<sup>3</sup> (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.

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<sup>3</sup> Town and Country Planning Act 1990. Available at: <https://www.legislation.gov.uk/ukpga/1990/8/contents>.

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

### Cultural Heritage

The NDP contains policies which will be likely to help protect the setting of heritage assets whilst helping to preserve the overall sense of place and distinctiveness of the local area. These policies include plans to adhere to the guidelines set out in the Brailes Village Design Statement (1998), to 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 will be likely to help protect the character of the local landscape. These policies include protection and enhancement for existing green spaces and green infrastructure (GI) within the area, thereby ensuring the design of new dwellings is consistent with existing buildings and ensuring high levels of tranquillity are maintained following development.

### Biodiversity and Geodiversity

The NDP contains policies which will be 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. The introduction of residential gardens could potentially help enhance the biodiversity value of some locations in the NDP area.

### Flooding

The NDP contains policies which will be expected 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.

The NDP has allocated three sites for residential development and the risk of fluvial flooding at all three sites is very low.

### Climate Change

The NDP contains policies which will be likely to reduce the area's contribution towards climate change through promoting energy efficiency and, where possible, integrating renewable energy generation into new proposals.

### Natural Resources

The NDP contains policies which will be likely to help ensure future development makes best use of the region's natural resources through re-using previously developed (brownfield) land as well as redundant buildings.

### Pollution

The NDP contains policies which will be likely to help lead to a reduction in local air, noise, soil, light and water pollution, such as by maintaining GI for its natural air filtering and carbon sink qualities as well as by promoting energy efficiency and renewable energy.

### Waste

The NDP contains policies which will be likely to help enhance the sustainability of waste management in the local area whilst contributing to a reduction in waste generation, such as through the use of recycled and reclaimed materials for construction.

### Transport

The NDP contains policies which will be likely to reduce the need for residents to travel such as by encouraging rates of working from home, improving access to communications and designing dwellings with spaces to accommodate working from home. Each of the proposed residential sites has excellent access to a high quality Public Right of Way (PRoW) network.

### Accessibility

The NDP contains policies which will be likely to help reduce barriers faced by those living in rural areas such as by encouraging residents to work from home, providing affordable housing in rural locations and promoting sustainable economic development of the area.

### Housing

Each site proposed for development will make a positive contribution to the varied housing needs of new and existing residents in the local area. Some policies proposed within the NDP also positively impact the housing objective by requiring proposals to adopt high quality housing standards and to make a positive contribution to the character and amenity of the local area.

### Health, Safety and Wellbeing

The NDP proposes policies which will be expected to make a positive contribution to the mental and physical health of residents, such as by retaining local green spaces and natural habitats which new and existing residents have good access to.

### Economy

The NDP promotes sustainable economic development throughout its vision and objectives. It proposes policies which will be likely to benefit the local economy in various ways, such as through encouraging residents to work from home and by protecting existing employment areas.

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

### Cultural Heritage

Sensitive cultural heritage assets such as Grade II Listed Buildings are distributed throughout Brailes. It is considered to be likely that some of the development proposed in the NDP will be viewable from a limited number of assets and, given that the development is proposed for previously undeveloped greenfields, there could potentially be a minor adverse impact on the setting of these assets.

There could potentially be adverse impacts on archaeological remnants in a limited number of circumstances.

### Landscape

The NDP area sits within the Cotswolds AONB and each of the proposed site allocations could potentially lead to a minor alteration of the character or tranquillity of this internationally important designation in some locations. Each site allocated for development is currently a previously undeveloped greenfield and building at these locations will be likely to alter some long distance and countryside views for sensitive receptors including local residents and users of the local PRow network.

### Biodiversity and Geodiversity

Each of the proposed site allocations are previously undeveloped greenfields. Development at these locations may result in a net reduction in vegetation cover, although residential gardens may also be an opportunity to enhance the biodiversity value of sites in some locations. Adverse impacts on protected habitats such as woodland and hedgerow, as well as adverse impacts on sensitive designations such as Local Wildlife Sites, are not expected.

### Flooding

One of the proposed site allocations has an extent of land at a medium to high risk of surface water flooding.

### Climate Change

Access to public and sustainable transport modes is somewhat limited in the local area and it is therefore considered to be likely that there will be a relatively high reliance on personal car use for new residents. A net increase in local greenhouse gas (GHG) emissions during the construction and occupation phases of the proposed residential development would increase the NDP area's contribution to the causes of climate change. A net loss in GI as a result of the proposed development would also reduce the carbon storage capacity of vegetation in the local area. Overall, the NDP will be likely to have a relatively minor but adverse impact on the climate change objective.

### Natural Resources

Each of the sites proposed for development are previously undeveloped greenfields. They are also Agricultural Land Classification Grade 3 and may therefore be some of the local area's most versatile and productive soils. The NDP will therefore be likely to result in minor but net loss of local soils and local soil fertility.

### Transport

Access to sustainable and public transport options is somewhat limited in the local area and as a result of this each site proposal generally scored poorly against the transport objective. Given this, and that access to necessary and popular services is somewhat limited in Brailes, it is considered to be likely that new residents will have a relatively high reliance on personal car usage.

### Accessibility

Access to necessary and popular services is somewhat limited in Brailes. New residents will be likely to have to travel by car to access key amenities and services.

### Health, Safety and Wellbeing

Each of the sites proposed for residential development in the NDP has limited access to a General Practitioner (GP), an NHS hospital with accident and emergency as well as a leisure centre.

### Economy

The NDP proposed development on existing agricultural fields and this could potentially result in a relatively minor but adverse impact on local employment opportunities, and the economic output, of the local agricultural sector.

# 1 Introduction

## 1.1 Introduction

1.1.1 Lepus Consulting is conducting a Strategic Environmental Assessment (SEA) of the Brailes pre-submission Neighbourhood Development Plan (NDP) (version June 2018), 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 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 Directive<sup>4</sup>. 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.

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<sup>4</sup> ODPM (2005) A Practical Guide to the Strategic Environmental Assessment Directive

## 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.

1.2.2 Article 5(1) of the SEA Directive states:

*'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:

*'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.
- 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:

## 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;
- Section 5: Appendices; and
- Section 6: Acknowledgements.

1.6.2 Section 4 contains the 14 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.

## 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.

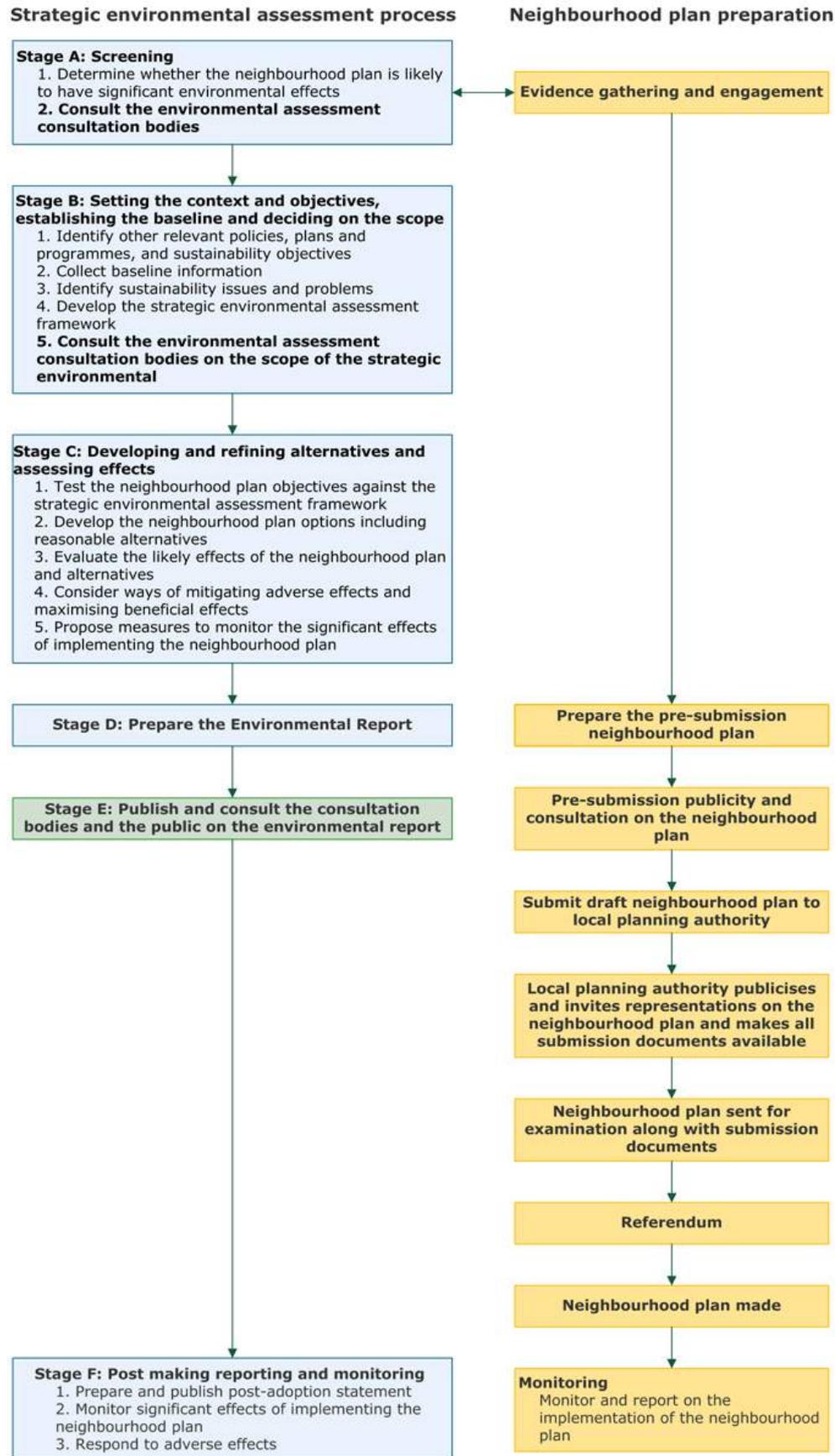


Figure 1.1: The key stages of SEA in neighbourhood plan preparation (DCLG 2015)

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

Policy Reference	Policy Name
<b>Environment</b>	
E1	Managing Local Water Environment and Flood Risk
E2	A Defined Built-Up Area Boundary
E3	Conserving Locally Valued Green Spaces Within the Village
E4	Ensuring Developments Respect the Landscape Setting and Local Character of the Village
E5	Promoting Local Renewable and Low Carbon Energy
E6	Retaining Dark Skies
<b>Housing</b>	
H1	Ensuring a supply of affordable homes
H2	Ensuring a supply of low cost market housing
H3	Development on windfall sites
H4	Allocating housing land to meet currently identified local needs
<b>Strong Economy</b>	
SE1	Encouraging Sustainable Economic Development
SE2	Re-use of Redundant Agricultural Buildings
SE3	Improving Access to Communications
SE4	More Opportunities for Home-Working

**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: <b>Chapter 1 and Chapters 3 to 12</b> SEA Report: <b>Chapter 1</b>
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: <b>Chapters 3 to 12</b>
Describe the environmental characteristics of areas likely to be significantly affected	SEA Scoping Report: <b>Chapters 3 to 12</b>
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: <b>Chapters 3 to 12</b> (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: <b>Chapters 3 to 12</b> Scoping Report: <b>Appendix B</b> SEA Report: <b>Chapter 2</b>
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: <b>Chapters 4, 6 and 7</b>
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: <b>Chapter 7</b>
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: <b>Chapters 3, 4 and 5</b>
Include a description of the measures envisaged concerning monitoring.	SEA Report <b>Chapter 8</b>
Include a non-technical summary of the information provided.	SEA Report <b>Non-Technical Summary</b>

## 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 2017<sup>5</sup>, 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. The findings from these assessments are presented in **Chapter 4**.

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<sup>5</sup> Lepus Consulting (2016) Strategic Environmental Assessment of the Brailes & Winderton Neighbourhood Development Plan: SEA Screening Document

### **Pre-submission NDP**

- 1.8.5 This report presents an SEA of June 2018 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.
- 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 11<sup>th</sup> 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 complementary 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 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 prepared by Lepus Consulting in July 2017<sup>6</sup>. 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.

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<sup>6</sup> Lepus Consulting (2017) Strategic Environmental Assessment of the Brailes & Winderton Neighbourhood Development Plan: Scoping Report

## 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.
- 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 Directive<sup>7</sup> 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**.

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<sup>7</sup> 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 applies 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**.
- 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.

**Table 3.1:** SEA Framework Objectives

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

## 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 principle<sup>8</sup>.

<sup>8</sup> The Precautionary Principle states that, in the absence of scientific evidence or consensus, the worst case scenario is assumed.

- 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.
- 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	Score
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)<sup>9</sup> 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 Maps<sup>10</sup>.

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<sup>9</sup> Barton, Grant and Guise (2010) Shaping Neighbourhoods for local health and global sustainability, Spon Press

<sup>10</sup> <https://www.google.co.uk/maps/>

**Table 3.3:** Sustainable distances to facilities and amenities Barton et al (2010)<sup>11</sup>.

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.
- 3.3.9 Information on location of extant ridge and furrow is obtained from the Historic Environment Record.

<sup>11</sup> Ibid.

**SEA Objective 2: Landscape**

- 3.3.10 The sensitivity of the landscape character as presented in the landscape studies conducted by WCC Architects (2016)<sup>12</sup> have been used to inform assessment as to the significance of any impacts that development may have on the local landscape.
- 3.3.11 A site visit was conducted by Lepus in August 2017 to determine the character of the local landscapes.
- 3.3.12 All proposed sites are within the Cotswolds AONB and thus the local landscape as a whole is sensitive to new developments.
- 3.3.13 The proportion of development which meets Building for Life Standards<sup>13</sup> 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**

- 3.3.14 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)<sup>14</sup> formed a large part of this information.
- 3.3.15 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)<sup>15</sup>) are present, appropriate surveys and ecology work will be conducted at the planning application stage to ensure NERC is accorded with.
- 3.3.16 Development at any of the sites is not anticipated to increase awareness of biodiversity and geodiversity assets.
- 3.3.17 It is assumed that where sites border hedges, these hedges are likely to be retained.

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<sup>12</sup> Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Study

<sup>13</sup> Design Council (2015) Building for Life 12: The Sign of a Good Place to Live

<sup>14</sup> The Habitat Biodiversity Audit and Warwickshire County Council (2010) Stratford-on-Avon District Ecological and Geological Assessment.

<sup>15</sup> Natural Environment and Rural Communities Act (2006) <http://www.legislation.gov.uk/ukpga/2006/16/contents>

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

#### **SEA Objective 4: Flooding**

3.3.19 Soil within the Brailes area is thought to have impeded drainage which is likely to lead to surface water flooding and overland flow<sup>16</sup>.

3.3.20 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 PPG<sup>17</sup>:

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

3.3.21 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 Agency<sup>18</sup>:

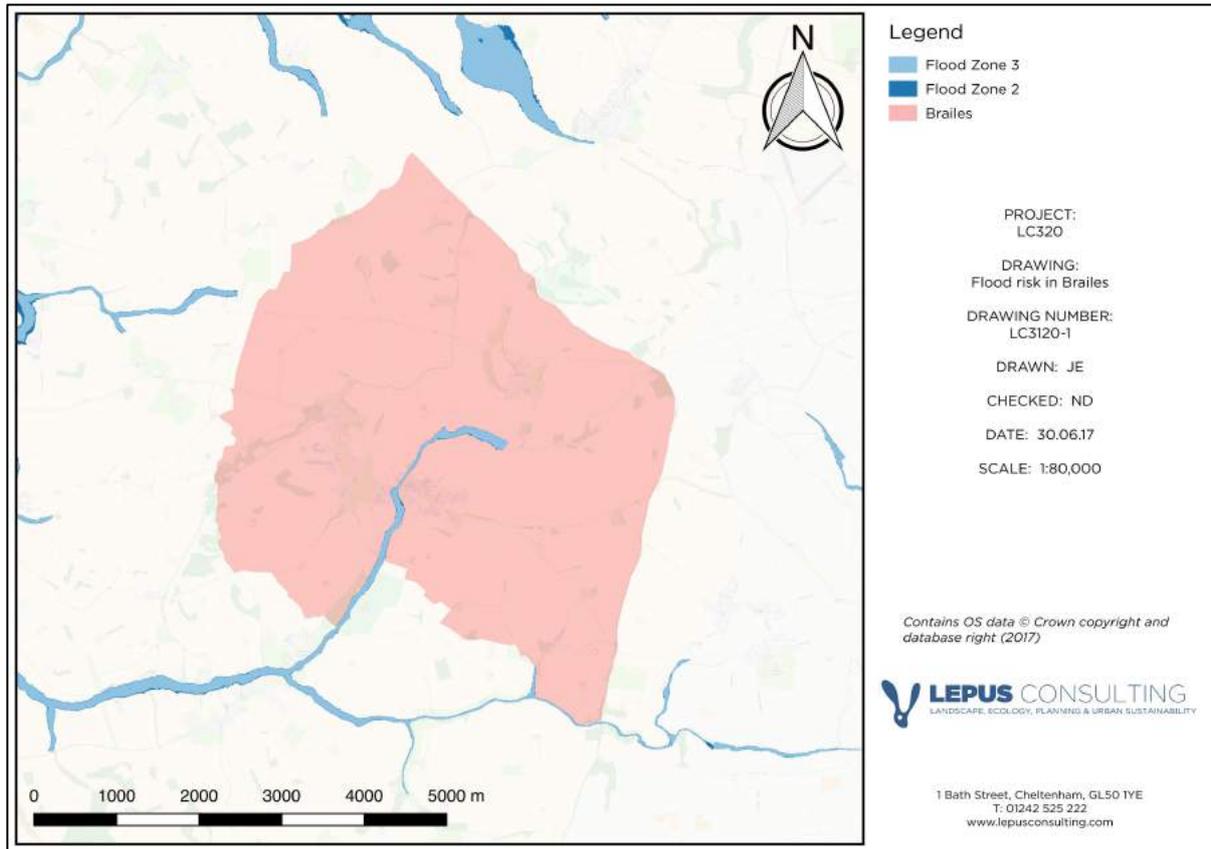
- High risk means that each year, there is an estimated chance of flooding of greater than 1 in 30 (3.3%).
- Medium risk means that each year, there is an estimated chance of flooding of between 1 in 30 (3.3%) and 1 in 100 (1%).
- Low risk means that each year, there is an estimated chance of flooding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

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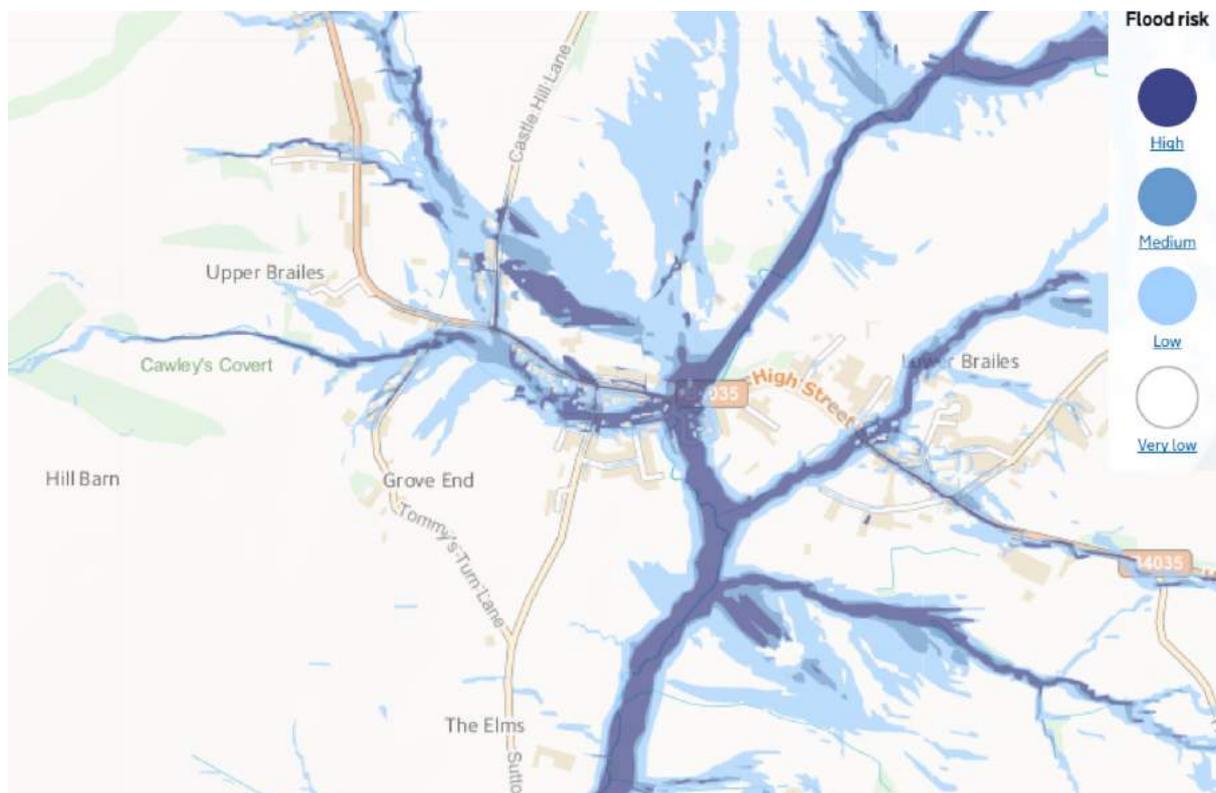
<sup>16</sup> Cranfield Soil and Agrifood Institute: Soilscales. Available at: <http://www.landis.org.uk/soilscales/>

<sup>17</sup> Department for Communities and Local Government (2015) Planning Practice Guidance. Paragraph: 065 Reference ID: 7-065-20140306

<sup>18</sup> Environment Agency (2013) Flood Map for Planning. Available at: <https://flood-map-for-planning.service.gov.uk/>



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



**Figure 3.2:** Surface water flood risk (Environment Agency data 2016)

- 3.3.22 The risk of groundwater flooding is unknown for all sites.
- 3.3.23 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**

- 3.3.24 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.
- 3.3.25 It is unknown whether development at any of the sites will help to raise awareness of climate change mitigation.
- 3.3.26 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.
- 3.3.27 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%<sup>19</sup>, however it is unknown whether this will be achieved, or whether development will help to achieve this.
- 3.3.28 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.
- 3.3.29 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.
- 3.3.30 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.

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<sup>19</sup> Camco (2010) Renewable and Low Carbon Energy Resource Assessment and Feasibility Study.

**SEA Objective 6: Natural Resources**

- 3.3.31 All sites are thought to have 'slowly permeable, seasonally wet, slightly acid but base-rich loamy and clayey soil' with low carbon and moderate fertility<sup>20</sup>.
- 3.3.32 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.
- 3.3.33 None of the sites assessed lie within a mineral safeguarding area<sup>21</sup>.
- 3.3.34 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 NPPF<sup>22</sup>. There is no PDL at the site unless otherwise stated.

**SEA Objective 7: Pollution**

- 3.3.35 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 average<sup>23</sup>.
- 3.3.36 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.

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<sup>20</sup> Cranfield Soil and Agrifood Institute: Soilscales. Available at: <http://www.landis.org.uk/soilscales/>

<sup>21</sup> British Geological Survey (2009) Mineral Safeguarding Areas for Warwickshire

<sup>22</sup> 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](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf)

<sup>23</sup> Public Health England (2017) Public Health Outcomes

3.3.37 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**

3.3.38 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.

3.3.39 The extent to which recycled materials will be used within construction is currently unknown.

3.3.40 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**

3.3.41 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.

3.3.42 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.

3.3.43 The nearest railway station is Moreton-in-Marsh approximately 12km to the south west.

3.3.44 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.

3.3.45 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.

3.3.46 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.

3.3.47 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).

3.3.48 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**

3.3.49 All bus services from Brailes are currently infrequent, with services available less than once every hour.

3.3.50 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.

3.3.51 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**

3.3.52 All sites are proposed for six dwellings or less. For sites proposed for six dwellings, two dwellings are anticipated to be affordable (subsidised).

3.3.53 The proportion of new dwellings expected to meet the building specification guidance in the Code for Sustainable Homes is currently unknown.

3.3.54 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**

- 3.3.55 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.
- 3.3.56 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.
- 3.3.57 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.
- 3.3.58 The extent to which the needs of the elderly are met within the new developments are also unknown without more detailed design proposals.
- 3.3.59 Access to greenspace, shown to be beneficial for physical and mental health<sup>24</sup>, is thought to be good at all sites.

**SEA Objective 13: Economy**

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

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<sup>24</sup> 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 unreasonable<sup>25</sup>. 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.
- 4.1.6 Similarly, the planning examiner raised concerns regarding the Bath and North East Somerset Core Strategy in 2012<sup>26</sup>. 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 PPG<sup>27</sup> 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'.

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<sup>25</sup> 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](https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/upload/B10-FHDC-Core-Strategy-High-Court-Order-04-May-2011.pdf)

<sup>26</sup>Bath 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>

<sup>27</sup> Department for Communities and Local Government (2015) Planning Practice Guidance Paragraph: 018 Reference ID: 11-018-20140306

### 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’<sup>28</sup>.
- 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’<sup>29</sup>.
- 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**.

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<sup>28</sup> Ibid.

<sup>29</sup> Department for Communities and Local Government (2015) Planning Practice Guidance. Paragraph: 037 Reference ID: 11-037-20150209

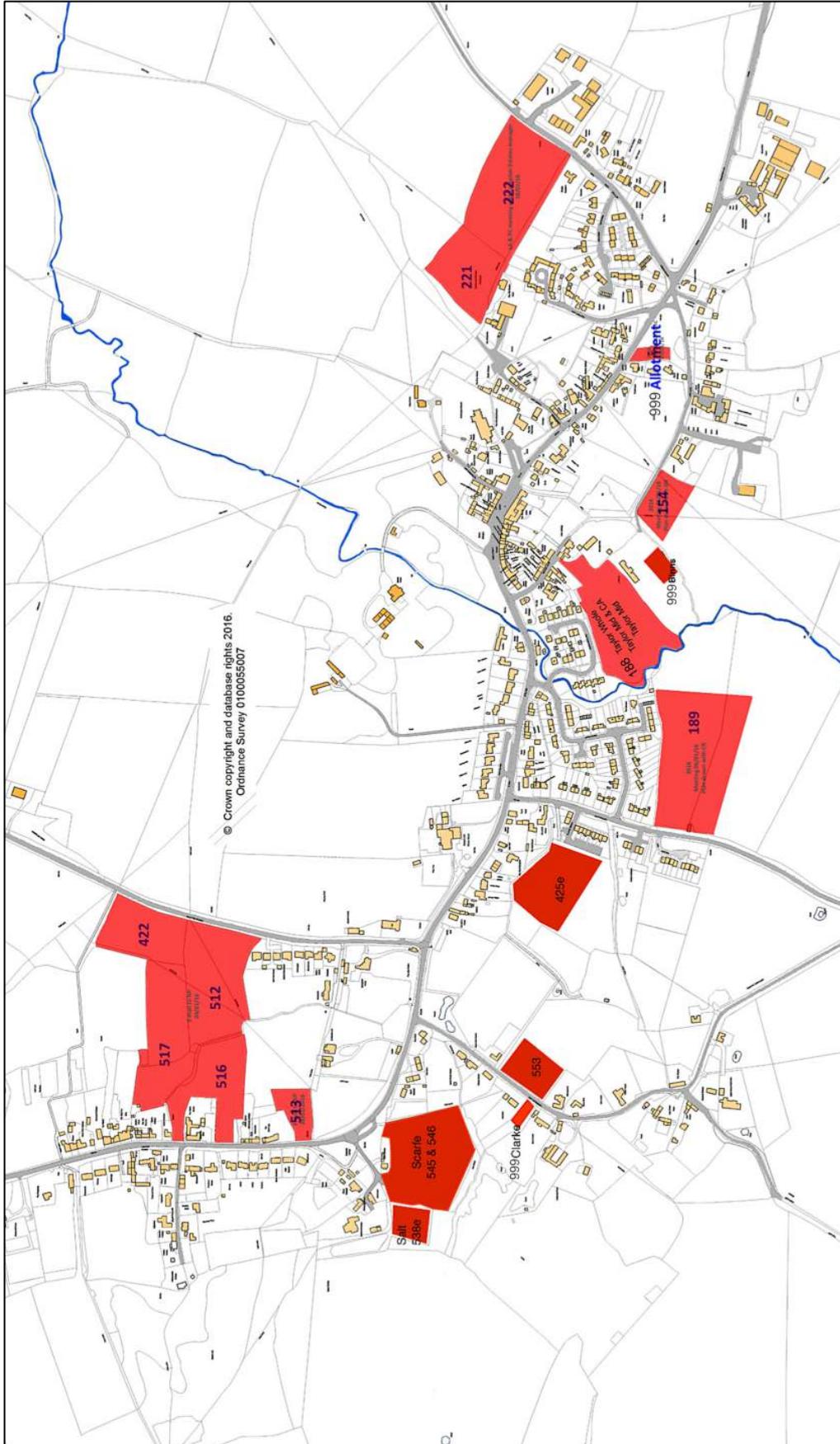


Figure 4.1: Map of 17 reasonable alternatives for sites<sup>30</sup>

## 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
-	-	0	+	-	-	0	0	-	-	+	-	-

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.

SEA 1	<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>
SEA 2	<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 Hill<sup>31</sup>. 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 development<sup>32</sup>. It is currently managed as arable land with linear scrub at the perimeter. The Cotswolds AONB Management Plan<sup>33</sup> 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 'Escarpment Outliers - Castle Hill' suggest this is a distinctive, highly visible landscape which is highly sensitive to change<sup>34</sup>.</p>

<sup>30</sup> 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>

<sup>31</sup> Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Study

<sup>32</sup> Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Study

<sup>33</sup> Cotswolds AONB Management Plan 2013-2018 (2013)

<sup>34</sup> Cotswolds AONB Landscape Strategy and Guidelines (2016) LCT1 'Escarpment Outliers'

	Within the Brailes Village Design Statement (1998) <sup>35</sup> Castle Hill is suggested to provide ' <i>wonderful views into the village</i> ' which may be adversely affected by development at this site.
SEA 3	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 <sup>36</sup> . 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 <sup>37</sup> . Development is not anticipated to adversely affect biodiversity here, but the sensitivity of the area should be considered if development is to occur.
SEA 4	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.
SEA 6	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.
SEA 9	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.
SEA 12	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.
SEA 13	Development at this site is anticipated to involve the loss of agricultural land which may adversely impact the local economy.

## 4.5

<sup>35</sup> Brailes Village Design Statement (1998)

<sup>36</sup> The Habitat Biodiversity Audit and Warwickshire County Council (2010) Stratford-on-Avon District Ecological and Geological Assessment.

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

## 4.6 512 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
--	--	-	--	-	-	O	O	--	--	+	-	O

4.6.1 512 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.

SEA 1	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.
SEA 2	This site has a flat topography but is situated at the lower slopes of a small stream valley between Brailes Hill and Castle Hill <sup>38</sup> . The site is thought to be poor semi-improved grassland <sup>39</sup> . 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 <sup>40</sup> . Guidelines for 'Escarpment Outliers - Castle Hill' suggest this is a distinctive, highly visible landscape which is highly sensitive to change <sup>41</sup> . The Cotswolds AONB Management Plan <sup>42</sup> 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) <sup>43</sup> Castle Hill is suggested to

<sup>38</sup> Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Study

<sup>39</sup> The Habitat Biodiversity Audit and Warwickshire County Council (2010) Stratford-on-Avon District Ecological and Geological Assessment

<sup>40</sup> Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Study

<sup>41</sup> Cotswolds AONB Landscape Strategy and Guidelines (2016) LCT1 'Escarpment Outliers'

<sup>42</sup> Cotswolds AONB Management Plan 2013-2018 (2013)

<sup>43</sup> Brailes Village Design Statement (1998)

	provide ' <i>wonderful views into the village</i> ' which may be adversely affected by development at this site.
SEA 3	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 <sup>44</sup> . 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.
SEA 4	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.
SEA 6	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.
SEA 9	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.
SEA 12	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.
SEA 13	Development is not anticipated to involve the loss of any employment land, therefore it is likely that the local economy will be unaffected.

<sup>44</sup> The Habitat Biodiversity Audit and Warwickshire County Council (2010) Stratford-on-Avon District Ecological and Geological Assessment

## 4.7 516 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

4.7.1 516 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.

SEA 1	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.
SEA 2	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 <sup>45</sup> . 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 <sup>46</sup> . 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 <sup>47</sup> . Within the Brailes Village Design Statement (1998) <sup>48</sup> Castle Hill is suggested to provide ' <i>wonderful views into the village</i> ' which may be adversely affected by development at this site.

<sup>45</sup> Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Study

<sup>46</sup> Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Study

<sup>47</sup> Cotswolds AONB Landscape Strategy and Guidelines (2016) LCT1 'Escarpment Outliers'

<sup>48</sup> Brailes Village Design Statement (1998)

SEA 3	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.
SEA 4	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.
SEA 6	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.
SEA 9	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.
SEA 12	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.
SEA 13	Development is not anticipated to involve the loss of any employment land, therefore it is likely that the local economy will be unaffected.

## 4.8 517 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

4.8.1 517 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.

SEA 1	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.
SEA 2	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 <sup>49</sup> . 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 <sup>50</sup> . Within the Brailes Village Design Statement (1998) <sup>51</sup> Castle Hill is suggested to provide ' <i>wonderful views into the village</i> ' which may be adversely affected by development at this site.

<sup>49</sup> Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Study

<sup>50</sup> Cotswolds AONB Landscape Strategy and Guidelines (2016) LCT1 'Escarpment Outliers'

<sup>51</sup> Brailes Village Design Statement (1998)

SEA 3	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.
SEA 4	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.
SEA 6	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.
SEA 9	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.
SEA 12	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.
SEA 13	Development is not anticipated to involve the loss of any employment land, therefore it is likely that the local economy will be unaffected.

## 4.9 513 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

4.9.1 513 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.

SEA 1	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.
SEA 2	This site comprises woodland with a flat topography and is thought to have a high sensitivity to housing development <sup>52</sup> . 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 <sup>53</sup> 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.
SEA 3	The main habitat present at the site is woodland, with hedges at the perimeter. The landscape sensitivity study <sup>54</sup> 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.
SEA 4	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.
SEA 6	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.

<sup>52</sup> Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Study

<sup>53</sup> Cotswolds AONB Management Plan 2013-2018 (2013)

<sup>54</sup> Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Study

	Development at this location is, therefore, not considered to be an efficient use of land.
SEA 9	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.
SEA 12	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.
SEA 13	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 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

4.10.1 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.

SEA 1	'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.
SEA 2	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 <sup>55</sup> .
SEA 3	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 <sup>56</sup> . Development is unlikely to significantly affect these areas although these should be carefully considered during design and construction.
SEA 4	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.
SEA 6	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.
SEA 9	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.
SEA 12	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.
SEA 13	Development is not anticipated to involve the loss of any employment land, therefore it is likely that the local economy will be unaffected.

<sup>55</sup> Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Study

<sup>56</sup> Biodiversity Scotland (2016) Managing Coniferous Woodland

## 4.11 545 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
-	--	-	+	-	-	○	○	--	--	+	-	○

4.11.1 545 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.

SEA 1	'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.
SEA 2	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 <sup>57</sup> .
SEA 3	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 <sup>58</sup> . 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.
SEA 4	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.

<sup>57</sup> Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Study

<sup>58</sup> Biodiversity Scotland (2016) Managing Coniferous Woodland

SEA 6	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.
SEA 9	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.
SEA 12	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.
SEA 13	Development is not anticipated to involve the loss of any employment land, therefore it is likely that the local economy will be unaffected.

## 4.12 999 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

4.12.1 999 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.

SEA 1	'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.
SEA 2	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 <sup>59</sup> , therefore their loss

<sup>59</sup> Cotswolds AONB Management Plan 2013-2018 (2013)

	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 <sup>60</sup> .
SEA 3	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 <sup>61</sup> . 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.
SEA 4	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.
SEA 6	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.
SEA 9	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.
SEA 12	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.
SEA 13	Development is not anticipated to involve the loss of any employment land, therefore it is likely that the local economy will be unaffected.

<sup>60</sup> Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Additional Study Areas

<sup>61</sup> The Habitat Biodiversity Audit and Warwickshire County Council (2010) Stratford-on-Avon District Ecological and Geological Assessment

### 4.13 553 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
-	-	-	+	-	-	0	0	-	-	+	-	-

4.13.1 553 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.

SEA 1	'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.
SEA 2	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 <sup>62</sup> . Overall this site is deemed to have a high sensitivity to housing development <sup>63</sup> .
SEA 3	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 <sup>64</sup> . 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.

<sup>62</sup> Cotswolds AONB Management Plan 2013-2018 (2013)

<sup>63</sup> Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Additional Study Areas

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

SEA 4	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.
SEA 6	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.
SEA 9	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.
SEA 12	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.
SEA 13	Development at this site is anticipated to involve the loss of agricultural land which may adversely impact the local economy.

#### 4.14 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

4.14.1 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.

SEA 1	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.
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SEA 2	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 <sup>65</sup> .
SEA 3	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.
SEA 4	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.
SEA 6	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.
SEA 9	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.
SEA 12	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.
SEA 13	Development is not anticipated to involve the loss of any employment land, therefore it is likely that the local economy will be unaffected.

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

## 4.15 189 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	-	-	+	-	-

4.15.1 189 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.

SEA 1	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.
SEA 2	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 <sup>66</sup> 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 <sup>67</sup> .
SEA 3	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.

<sup>66</sup> Cotswolds AONB Management Plan 2013-2018 (2013)

<sup>67</sup> Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Additional Study Areas

SEA 4	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.
SEA 6	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.
SEA 7	There is a risk of contaminating Sutton Brook waterway during construction.
SEA 9	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.
SEA 12	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.
SEA 13	Development at this site is anticipated to involve the loss of agricultural land which may adversely impact the local economy.

#### 4.16 188 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

- 4.16.1 188 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.

SEA 1	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. According to the
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	Historic Environment Record, ridge and furrow exists within the site, however a geophysical survey report identifies no evidence of extant ridge and furrow <sup>68</sup> .
SEA 2	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 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 <sup>69</sup> .
SEA 3	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. A site-specific ecological survey identifies no on-site presence of protected species, with the surrounding habitats of hedgerows and Sutton Brook likely to host greatest biodiversity <sup>70</sup> . Mitigation measure are proposed to limit harm to biodiversity in these areas, however development is still anticipated to have a negative impact on biodiversity.
SEA 4	According EA Flood Risk Data, a large area in the east of the site is coincident Flood Zones 2 and 3, associated with Sutton Brook. However, a site-specific flood risk assessment was carried out in 2015 <sup>71</sup> , revealing this area is smaller and not coincident with much of the development area. The risk of surface water flooding is thought to be high at this location.
SEA 6	Land at the site is entirely undeveloped greenfield land and is currently unused, however development at this site would not be seen as an efficient use of natural resources.
SEA 7	There is a risk of contaminating Sutton Brook waterway during construction.
SEA 9	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.
SEA 12	The PRoW network around the site facilitates good access to the surrounding countryside via walking or running. Playing fields are situated approximately 500m

<sup>68</sup> Stratascan (2015) Betty's Field Lower Brailes Geophysical Survey Report

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

<sup>70</sup> The Environmental Dimension Partnership (2014) Betty's Field Ecological Appraisal

<sup>71</sup> THDA Limited Consulting Engineers (2015) Land Off Orchard Close, Brailes, Warwickshire Flood Risk Assessment

	north west offering proximal public open space for prospective residents. Private allotments are also situated approximately 500m east of the site.
SEA 13	Development is not anticipated to involve the loss of any employment land, therefore it is likely that the local economy will be unaffected.

#### 4.17 999 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

- 4.17.1 999 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.

SEA 1	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.
SEA 2	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.
SEA 3	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.
SEA 4	The site is within Flood Zone 1. Risk of surface water flooding is high at this location.

SEA 6	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.
SEA 7	There is a risk of contaminating Sutton Brook waterway during construction.
SEA 9	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.
SEA 12	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.
SEA 13	Development is not anticipated to involve the loss of any employment land, therefore it is likely that the local economy will be unaffected.

## 4.18 154 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	-	-	+	-	-

4.18.1 154 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.

SEA 1	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
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	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.
SEA 2	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 <sup>72</sup> .
SEA 3	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.
SEA 4	The site is within Flood Zone 1. Risk of surface water flooding is very low at this location.
SEA 6	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.
SEA 9	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.
SEA 12	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.
SEA 13	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.

<sup>72</sup> Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Study

## 4.19 999 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
-	-	-	-	-	-	0	0	-	-	+	-	0

4.19.1 999 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.

SEA 1	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.
SEA 2	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.
SEA 3	This site is currently used as allotments which have the capacity for relatively high levels of biodiversity through appropriate management <sup>73</sup> . 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.
SEA 4	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.

<sup>73</sup> Natural England (2007) Wildlife on Allotments

SEA 6	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.
SEA 9	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.
SEA 12	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.
SEA 13	Development is not anticipated to involve the loss of any employment land, therefore it is likely that the local economy will be unaffected.

## 4.20 221 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	--	--	+	-	-

4.20.1 221 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.

SEA 1	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.
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SEA 2	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> ' <sup>74</sup> . Overall this study found the site to have a high-medium sensitivity to housing development <sup>75</sup> .
SEA 3	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.
SEA 4	The site is within Flood Zone 1. Risk of surface water flooding is seen to be very low at this site.
SEA 6	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.
SEA 9	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.
SEA 12	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.
SEA 13	Development at this site is anticipated to involve the loss of agricultural land which may adversely impact the local economy.

<sup>74</sup> Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Study

<sup>75</sup> Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Study

## 4.21 Compton Estates 222 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
-	-	0	+	-	-	0	0	-	-	+	-	-

4.21.1 Compton Estates 222 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> <sup>76</sup> . Overall this study found the site to have a high-medium sensitivity to housing development <sup>77</sup> .
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.

<sup>76</sup> Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Study

<sup>77</sup> 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 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.
SEA1 2	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.
SEA1 3	Development at this site is anticipated to involve the loss of agricultural land which may adversely impact the local economy.

## 4.22 Summary of reasonable alternative sites assessment scores

**Table 4.1** presents the SA scores for each site as per the following:

- 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; and
- 17, Compton Estates 222 East.

**Table 4.1:** SEA Objective scoring matrix for all reasonable alternative 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 Preferred approach

5.1.1 Within the latest version of the pre-submission NDP, the Steering Group have identified their preferred approach for delivering development in the parish which satisfies the local needs in a way that is socially, environmentally and economically sustainable. The NDP steering group have set out their justification for this approach, and an overview of how reasonable alternatives have been considered and rejected or selected, in **Section 5.2**.

5.1.2 The preferred approach for site allocations is comprised of the following three sites (see **Figure 5.1**):

- Site Compton Estates 222 East, opposite the Industrial Estate;
- Site James 425e Sutton Lane, west side rear of Blakes Close, Lower Brailes; and
- Site Righton 189 Sutton Lane, east side, Lower Brailes.

5.1.3 These three sites are within the proposed Brailes Built Up Area Boundary (BUAB). They were each appraised for their likely sustainability impacts during the SEA appraisal of reasonable alternatives for sites. The findings of these assessments helped inform the NDP steering group's decision-making process on which sites to allocate for development. They decided on a combination of the three sites listed above and, in order to help avoid adverse sustainability impacts, they altered the site boundaries.

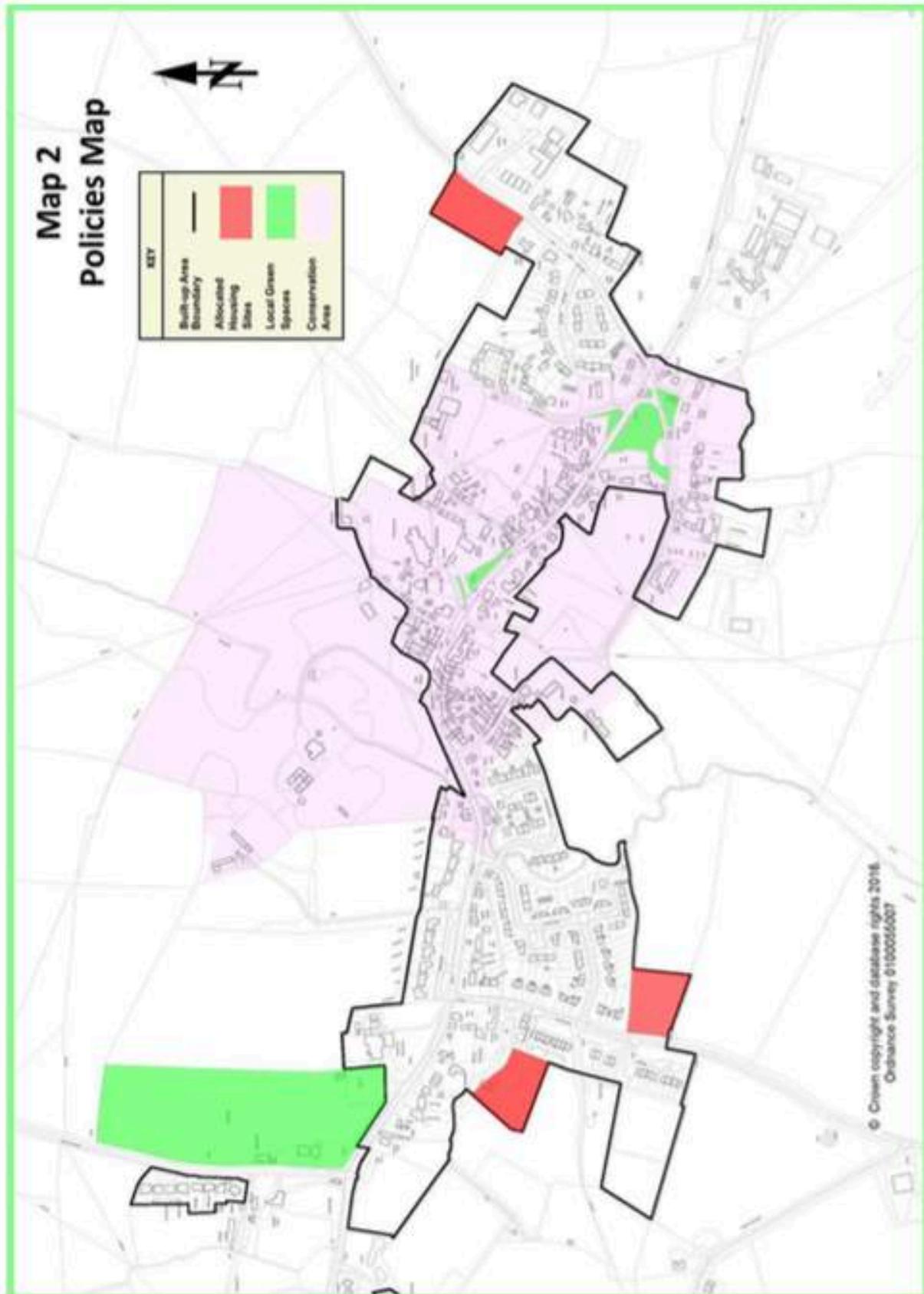


Figure 5.1: Map of site allocations proposed in the NDP (map taken from the NDP)

## 5.2 NDP group's justification for the preferred approach

### Selection process

- 5.2.1 The steering group ranked all the offered sites in order of acceptability for development as judged by the assessment tool results (see **Table 5.1**). 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).
- 5.2.2 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).
- 5.2.3 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, we would only be selecting sites that could accommodate six houses.
- 5.2.4 The original SEA appraisal in October 2017 identified significant issues with the "Manley Castle Hill" site. The NDP team held a number of discussions with Historic England, who, following a site visit, confirmed that they did not consider the site viable due to its proximity to the ancient site of Castle Hill.
- 5.2.5 At the same time, the owners of the "James" site withdrew their agreement to build six houses on the site, saying they wished to build more.
- 5.2.6 The withdrawal of two of our four allocated sites (one due to an objection from Historic England and one due to the landowner withdrawing the site), has the NDP team to re-assess this policy.
- 5.2.7 To continue with a 6 home policy, we would need to conduct a new call for sites and start the lengthy process again (as sites further down our list of sites were less appropriate for building on)
- 5.2.8 Given the urgency to protect our village from unwanted development and ensure a Built-Up Area Boundary (BUAB) is drawn as soon as possible, the committee voted to adopt policy of three sites each with 12 homes (four of which would be affordable).

- 5.2.9 On the 30<sup>th</sup> April 2018 the committee met with all three landowners (or their representatives) and used the Locality Site Assessment Checklist to check the three main criteria for accepting a site: Suitability, Availability and Viability. All three sites met the criteria.
- 5.2.10 This change in Policy was endorsed by the Brailes Parish Council at their meeting on 29<sup>th</sup> May 2018 when they recommended that the revised Plan be put to the Regulation 14 Consultation. This would give the Parish to opportunity to endorse this change in strategy.

**Table 5.1:** Ranking of all the offered sites in order of acceptability

Rank	Site Name	Score
1	Compton Estates 222 East	0.30
2	Righton 189 Sutton Lane	3.22
3	James 425 e	9.17
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
14	Scarfe Land 545/546	16.92
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	35.63

### Site Analysis Assessment Document

- 5.2.11 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.
- 5.2.12 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%; and
  - A gradual addition of the dwellings through to 2031 with a score of over 81%.

- 5.2.13 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).
- 5.2.14 Residents were asked two fundamental and important questions at the 16<sup>th</sup> and 18<sup>th</sup> 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?
- 5.2.15 The criteria are as follows, which are listed in order of priority according to resident feedback.
1. Flooding;
  2. Landscape Sensitivity High;
  3. Landscape Sensitivity Med/High;
  4. Conservation Area;
  5. Green Finger;
  6. AONB;
  7. Green Separation Corridors;
  8. VDS Views;
  9. Green Entry Corridors;
  10. Habitat High (4-6);
  11. Habitat Low (1-3);
  12. Ridge & Furrow;
  13. Medieval Settlement;
  14. Footpath; and
  15. Medieval Earthworks.
- 5.2.16 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.
- 5.2.17 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.

5.2.18 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.

5.2.19 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.

### 5.3 Appraisal of the preferred approach

5.3.1 The preferred approach proposed in the pre-submission NDP includes three residential site allocations. Each of these were assessed during the assessments of reasonable alternatives for sites, the findings of which are presented in **Chapter 4**. In light of these findings, along with other evidence documents compiled by the NDP group and after careful consideration of the local area’s development needs, the boundaries

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

## 5.4 189 Sutton Lane 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
-	-	0	+	-	-	0	0	-	-	+	-	-

5.4.1 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.

SEA 1	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.
SEA 2	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 <sup>78</sup> 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 <sup>79</sup> . 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.
SEA 3	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.

<sup>78</sup> Cotswolds AONB Management Plan 2013-2018 (2013)

<sup>79</sup> Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Additional Study Areas

SEA 4	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.
SEA 6	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.
SEA 7	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.
SEA 9	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.
SEA 12	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.
SEA 13	Development at this site is anticipated to involve the loss of agricultural land which may adversely impact the local economy.

## 5.5 425e Sutton Lane 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	--	--	+	-	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.

SEA 1	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.
SEA 2	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 <sup>80</sup> . 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.
SEA 3	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.
SEA 4	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.
SEA 6	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.
SEA 9	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.
SEA 12	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.
SEA 13	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

<sup>80</sup> Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Additional Study Areas

## 5.7 Compton Estates 222 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
-	-	0	+	-	-	0	0	--	--	+	-	0

5.7.1 222 Compton East is a site west of Salt Way Lane and opposite the industrial estate. The site comprises the easternmost area of an open field currently under arable cultivation with hedges and trees along the perimeter.

SEA 1	<p>The site is currently a previously undeveloped arable field and the proposed development here would be likely to alter the local character to some extent, although land south of the site is in residential use whilst opposite the site is an existing industrial estate and therefore impacts on the local character will be minimal.</p> <p>Approximately 200m west of the site is the Grade II* Listed Building ‘Old Rectory Farmhouse and Attached Roman Catholic Chapel of Saint Peter and Saint Paul’.</p> <p>There are a several Grade II Listed Buildings along the High Street as well as those associated with St George Church.</p> <p>The proposed development at this location could potentially have a minor adverse impact on the setting of these heritage assets. The lay of the land and the presence of screening vegetation will be likely to help ensure that this impact is minor.</p>
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SEA 2	<p>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.</p> <p>Adjacent to the south of the site are existing residential properties. On the other side of the lane, opposite the site, is an industrial estate. The site sits within the BUAB.</p> <p>The proposed development here will be likely to alter countryside and rural views for sensitive receptors, including those views for residents south of the site as well as views for users of the nearby PRoW network.</p> <p>The recent WCC Focused Landscape Study states that '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' - this was for the site prior to the changed boundary. Overall this study found the site, without the changed boundary, to have a high-medium sensitivity to housing development. Given this, and the potential impacts on rural views, a minor adverse impact on the landscape objective cannot be ruled out.</p>
SEA 3	<p>The site is in agricultural use and its biodiversity value is likely limited to the hedgerows delineating its perimeter. Residential gardens could potentially be an opportunity to enhance the site's biodiversity value.</p>
SEA 4	<p>The site is within Flood Zone 1 whilst surface water flood risk is also very low at this location.</p>
SEA 6	<p>The site is an undeveloped greenfield and the proposed development at this location would therefore not be an entirely efficient use of land.</p>
SEA 9	<p>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.</p>
SEA 12	<p>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.</p>
SEA 13	<p>Development at this site is anticipated to involve the loss of agricultural land which may adversely impact the local economy.</p>

## 5.8 Overview of appraisal findings

5.8.1 **Table 5.2** summarises the assessment scores for the proposed site allocations, as per;

- 1: Righton 189 Sutton Lane East;
- 2: James 425e Sutton Lane West; and
- 3: Compton Estates 222 East

**Table 5.2:** SEA scoring matrices for site allocations proposed in the NDP

	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	-	-	○	+	-	-	○	○	⊖	⊖	+	-	-
2	-	-	○	⊖	-	-	○	○	⊖	⊖	+	-	○
3	-	-	○	+	-	-	○	○	⊖	⊖	+	-	○

# 6 Assessment Findings: Policies

## 6.1 Introduction

6.1.1 The 14 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 E1: 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 E2: A defined 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
+	+	+	○	○	○	○	○	○	○	+	○	○

6.3.1 The Policies Map accompanying the NDP identifies the boundary of the built up area of the village (BUAB). Future development will only be permitted where it is within the BUAB. By defining the BUAB, the NDP will help to ensure that future development accords with the existing settlement pattern and is less likely to alter long distance countryside views.

### 6.4 Policy E3: Conserving locally valued green spaces within the village

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 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.

## 6.5 Policy E4: Ensuring developments respect the landscape setting and local character of the village

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 sets out the requirements for high quality design of new developments in Brailes to help ensure that the character and setting of sensitive landscapes as well as cultural heritage assets are conserved. By requiring proposals to show how they will make a positive contribution to landscape character, there could potentially be an enhancement of views and character in some locations. Within section (2) of this policy is also the requirement for development proposals to protect or enhance biodiversity.

## 6.6 Policy E5: 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
○	○	○	○	++	+	++	+	○	○	○	○	+

6.6.1 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.

## 6.7 Policy E6: 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
+	++	+	○	○	○	++	○	○	○	○	○	○

6.7.1 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.

## 6.8 Policy H1: Ensuring a supply of affordable homes

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 In line with this policy, development proposals which are exclusively affordable homes will be supported in principle. These homes will be required to remain affordable following reallocation or resale. This will help to ensure that future development in Brailes satisfies the varied housing needs of local residents.

## 6.9 Policy H2: Ensuring a supply of low cost market housing

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 In line with this policy, proposals for low cost market housing will be supported in principle. These houses will be required to remain low cost following resale. This will help to ensure that future development within Brailes satisfies the varied housing needs of local residents.

## 6.10 Policy H3: Development on windfall 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
○	○	○	○	○	○	○	○	○	○	+	○	○

6.10.1 Through this policy the NDP Group intend to encourage small housing developments on windfall sites in order to contribute towards meeting the varied housing needs of the local area.

## 6.11 Policy H4: Allocating housing land to meet currently identified local 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
-	-	O	--	-	-	O	O	--	--	++	-	-

6.11.1 This policy allocates the three edge of settlement sites for residential development. Each site has a capacity of twelve dwellings and they are allocated such that the required affordable homes content of 4 dwellings on each site will contribute towards meeting local housing needs. Because this policy allocates the sites assessed in **Chapter 5**, it can be seen to be the cause of the adverse impacts identified during the site appraisals and this is reflected in this policy's scoring.

## 6.12 Policy SE1: 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
O	O	O	O	O	O	O	O	O	+	O	O	++

6.12.1 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.

## 6.13 Policy SE2: 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
O	+	O	O	+	++	O	+	O	O	O	O	O

6.13.1 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.

## 6.14 Policy SE3: 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
O	O	O	O	+	O	+	O	+	+	O	O	++

6.14.1 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.

## 6.15 Policy SE4: 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	++

6.15.1 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 Brailes<sup>81</sup>.

<sup>81</sup> Brailes pre-submission Neighbourhood Development Plan (2017)

## 6.16 Summary of policies assessments scores

6.16.1 The SA Scoring matrices for all policies assessed in this report have been brought together in **Table 6.1**. It is apparent from these scores that the policies proposed in the NDP will be likely to help ensure future development in the parish positively impacts most SEA topics. Policy H4 allocates sites for residential development (see the appraisal of the preferred approach in **Chapter 5**) and can therefore be expected to result in the adverse impacts identified for each site proposal.

**Table 6.1:** SEA scoring matrices for policies proposed in the NDP

	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 well-being	Economy
E1	○	○	+	++	+	+	+	○	○	○	+	+	+
E2	+	+	+	○	○	○	○	○	○	○	+	○	○
E3	+	+	+	○	○	+	+	○	○	○	○	+	○
E4	++	++	+	○	○	○	○	○	○	○	○	+	○
E5	○	○	○	○	++	+	++	+	○	○	○	○	+
E6	+	++	+	○	○	○	++	○	○	○	○	○	○
H1	○	○	○	○	○	○	○	○	○	○	++	○	○
H2	○	○	○	○	○	○	○	○	○	○	++	○	○
H3	○	○	○	○	○	○	○	○	○	○	+	○	○
H4	-	-	○	--	-	-	○	○	--	--	++	-	-
SE1	○	○	○	○	○	○	○	○	○	+	○	○	++
SE2	○	+	○	○	+	++	○	+	○	○	○	○	○
SE3	○	○	○	○	+	○	+	○	+	+	○	○	++
SE4	○	○	○	○	+	○	+	○	+	+	○	○	++

# 7 Significant & Cumulative Effects and Recommendations

## 7.1 Significant and cumulative effects

7.1.1 The following chapter will discuss the potential for significant and cumulative adverse impacts to arise as a result of the NDP in relation to each SEA Objective. 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.”*

## 7.2 Mitigation

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

7.2.2 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.

7.2.3 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.

### 7.3 Cultural Heritage - Significant and Cumulative Impacts

7.3.1 Each of the proposed site allocations is expected to result in a minor but adverse impact on cultural heritage in the area. This is due to the potential impacts that developing arable greenfields may have on the setting of a limited number of Grade II Listed Buildings. Due to the distribution of site allocations, the distribution of heritage assets and the lay of the land, cumulative and significant adverse impacts are not anticipated for the cultural heritage objective.

### 7.4 Cultural Heritage - Mitigation Recommendations

7.4.1 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 where appropriate.

7.4.2 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 England<sup>82</sup>.

7.4.3 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 Society<sup>83</sup>. This is especially relevant to:

7.4.4 It is also recommended that, where appropriate and where the opportunity exists, proposals should seek to enhance access to, and increase the local awareness of, cultural heritage assets in the local area.

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<sup>82</sup> 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/>

<sup>83</sup> Royal Horticultural Society (2017) Plants for Screening. Available at: <https://www.rhs.org.uk/advice/profile?PID=636>

## 7.5 Landscape - Significant and Cumulative Impacts

7.5.1 Each of the sites allocated for residential development in the NDP is anticipated to result in a minor adverse impact on the landscape objective. This is primarily due to the potential impacts of development on long distance and/or countryside views for sensitive receptors including users of the local PRow network as well as local residents. These impacts are not considered to be significant and, given the lay of the land and the distribution of the proposed development, a cumulative impact on the landscape objective, caused by several or all sites in-combination, is not expected.

## 7.6 Landscape - Mitigation Recommendations

7.6.1 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 Plan<sup>84</sup>) such as dry stone walls and hedges is likely to aid this.

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

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

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<sup>84</sup> Cotswolds AONB Management Plan 2013-2018 (2013)

## 7.7 Biodiversity - Significant and Cumulative Impacts

7.7.1 Each of the sites allocated for development in the NDP are anticipated to result in a negligible impact on the biodiversity and geodiversity objective. Each site will avoid sensitive biodiversity assets and designations whilst the current biodiversity value within each site is likely to be very limited. A significant or cumulative impact on the biodiversity objective is therefore not expected. There could potentially be a net gain for biodiversity in the area due to the biodiversity value of residential gardens.

## 7.8 Biodiversity - Mitigation Recommendations

7.8.1 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.

7.8.2 Woodland connectivity is low in parts of the Brailes area<sup>85</sup>, which could be improved through the addition of connecting woodland fragments within developments. Total or partial loss of, and harm to, existing linear features such as woodland, hedgerows, tree lines and aquatic networks should be avoided.

## 7.9 Flooding - Significant and Cumulative Impacts

7.9.1 Site James 425e along Sutton Lane has an area of land a medium to high risk of surface water flooding, according to EA data. Of all the proposed site allocations in the NDP, this is the only portion of a site considered to be at risk of flooding. All sites are within Flood Zone 1 (i.e. fluvial flood risk is very low). The proposed site allocations are not expected to result in a significant or cumulative impact on flooding.

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<sup>85</sup> The Habitat Biodiversity Audit and Warwickshire County Council (2010) Stratford-on-Avon District Ecological and Geological Assessment.

## 7.10 Flooding - Mitigation Recommendations

- 7.10.1 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.
- 7.10.2 Where development in an area at high risk of any kind of flooding is unavoidable, mitigation should involve implementing sustainable urban drainage systems (SuDS)<sup>86</sup> and/or GI features such as attenuation and balancing ponds<sup>87</sup>. GI features can also slow surface water runoff and increase absorption of floodwater.
- 7.10.3 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)<sup>88</sup>. 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:

## 7.11 Climate Change - Significant and Cumulative Impacts

- 7.11.1 Each site proposal in the NDP is anticipated to result in a minor adverse impact on the climate change objective. This is primarily because of the likely increase in greenhouse gas (GHG) emissions caused by the construction and occupation of new homes, as well as the likely increase in local personal car use. The proposed development at each site will also result in a minor loss of GI, which reduces the climate change adaptation capability of land in the local area (e.g. flood risk attenuation, urban heat island effect mitigation, carbon storage). Each of the sites in-combination will be likely to result in a cumulative net increase in local GHG emissions. However, given the relatively small scale of the development proposals a significant impact on climate change is unlikely.

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<sup>86</sup> Construction Industry Research and Information Association (2007) Sustainable Urban Drainage System Manual

<sup>87</sup> Construction Industry Research and Information Association (2014) Using green infrastructure and nature to manage flood risk

<sup>88</sup> DEFRA (2015) Environmental Stewardship: guidance and forms for agreement holders

## 7.12 Climate Change - Mitigation Recommendations

- 7.12.1 To promote the natural air filtering qualities and carbon sink function of local vegetation, the retention of existing GI and incorporation of new GI into development proposals should be encouraged where appropriate.
- 7.12.2 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.
- 7.12.3 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 ways<sup>89</sup>.

## 7.13 Natural Resources - Significant and Cumulative Impacts

- 7.13.1 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.
- 7.13.2 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.

## 7.14 Natural Resources - Mitigation recommendations

- 7.14.1 Wherever possible development should utilise PDL and existing buildings for development.
- 7.14.2 Wherever possible construction should take place with re-used or recycled materials.

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<sup>89</sup> 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>

- 7.14.3 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.

## 7.15 Pollution - Significant and Cumulative Impacts

- 7.15.1 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.

- 7.15.2 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 household<sup>90</sup>), and an expected high reliance on personal car use will result in an increased contribution of GHG and release of other pollutants.

## 7.16 Pollution - Mitigation recommendations

- 7.16.1 Employment of water quality mitigation methods including SuDS, ESS and water flood attenuation schemes is advised.
- 7.16.2 Retain existing GI and incorporate this into the development where possible.
- 7.16.3 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' guidelines<sup>91</sup>.

## 7.17 Waste - Significant and Cumulative Impacts

- 7.17.1 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.

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<sup>90</sup> Office for National Statistics (2011)

<sup>91</sup> Forest Research (2006) Improving Air Quality

7.17.2 Cumulative impacts of development at the preferred options will result in greater waste production in the Brailes area. At this small scale of development it is anticipated that the increased amount of waste will not be significant.

## **7.18 Waste - Mitigation Recommendations**

7.18.1 Where economically and environmentally practical, development should promote re-use of locally sourced and/or recycled materials, and high quality recycling facilities.

7.18.2 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.

7.18.3 Provision of areas within gardens and/or developments for home-grown food would reduce food waste.

## **7.19 Transport and Accessibility - Significant and Cumulative Impacts**

7.19.1 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.

7.19.2 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.

## **7.20 Transport and Accessibility - Mitigation Recommendations**

7.20.1 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.

7.20.2 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 schemes<sup>92</sup>.

## **7.21 Housing - Significant and Cumulative Impacts**

7.21.1 All sites were scored positively for housing and no adverse impacts on this objective are expected.

7.21.2 Cumulative impacts of development at the preferred options will result in an overall contribution of 24 dwellings, eight of which will be affordable.

## **7.22 Health, Safety and Wellbeing - Significant and Cumulative Impacts**

7.22.1 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.

7.22.2 Cumulative impacts of development at the preferred options will not result in any impact to the health, safety and wellbeing of residents.

## **7.23 Health, Safety and Wellbeing - Mitigation Recommendations**

7.23.1 Availability and access to high quality green spaces is beneficial for both physical and mental health<sup>93</sup>. Provision of local green space should meet Natural England's 'Access to Natural Greenspace Standard'<sup>94</sup>.

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<sup>92</sup> 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>

<sup>93</sup> 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.

<sup>94</sup> Natural England (2010) Access to Natural Greenspace Standard

- 7.23.2 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 schemes<sup>95</sup>.
- 7.23.3 Certain settlement design features, such as adventure areas, safe walking and cycling routes to schools, are able to promote a healthy lifestyle, especially amongst children<sup>96</sup>. These measures encourage increased physical activity.
- 7.23.4 It is recommended that green spaces are highly accessible, safe, functional, have a high biodiversity value and are of a high quality. This 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.

## **7.24 Economy - Significant and Cumulative Impacts**

- 7.24.1 There could potentially be a reduction in employment opportunities in the local area as a result of the proposed development at 189 Sutton Lane East which currently provides employment in the agricultural sector. A negligible impact on the economy objective is expected for the remaining sites and cumulative or significant impacts are unlikely.

## **7.25 Economy - Mitigation Recommendations**

- 7.25.1 Enhancing sustainable transport services would be likely to boost the local economy.

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<sup>95</sup> 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>

<sup>96</sup> 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>

## 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).

8.1.2 The Environmental Report should also 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.

8.1.3 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.

8.1.4 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.

8.1.5 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 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.
- 8.1.8 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 Environmental Report

9.1.1 This document constitutes an Environmental Report for the purposes of the SEA Directive, in order to:

- Provide an outline of the contents and main objectives of the NDP and its relationship with other relevant plans;
- Consider the environmental protection objectives established at international, national or community level and how these objectives are relevant to the NDP;
- Assess the likely significant effects on the environment caused by the NDP (including 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);
- 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 NDP;
- 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; and
- Include a description of the measures envisaged concerning monitoring.

9.1.2 Appraisals of the proposed site allocations did not identify any likely significant effects on the environment whilst the vision, objectives and policies of the NDP will be expected to result in significantly positive sustainability impacts.

## 9.2 Next Steps

9.2.1 This Environmental Report will be subject to consultation with the statutory bodies, the responses from which will be included in the appendices.

- 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 conditions<sup>97</sup>.
- 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.
- 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.

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<sup>97</sup> own and Country Planning Act 1990. Available at: <https://www.legislation.gov.uk/ukpga/1990/8/contents>.

## **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	<b>Cultural heritage:</b> 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	<b>Landscape:</b> 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	<b>Biodiversity &amp; geodiversity:</b> 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

#	SEA Objective	Decision making criteria: Will the option...		Indicators (this list is not exhaustive)
				Extent and condition of key habitats for which Biodiversity Action Plans have been established
				Area of new habitat creation reflecting BAP priorities
		Q3c	Will it maintain and enhance national sites designated for their biodiversity value?	Number, area and condition of national designated sites 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	<b>Flooding:</b> 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	<b>Climate change:</b> 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	Amount of new greenspace created per capita

#	SEA Objective	Decision making criteria: Will the option...		Indicators (this list is not exhaustive)
			infrastructure to help facilitate climate change adaptation?	
		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	<b>Natural resources:</b> 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
		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	<b>Pollution:</b> 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	<b>Waste:</b> 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	<b>Transport:</b> Increase the efficiency of transport networks and improve access	Q9a	Will it reduce the need to travel?	Average distance travelled to work Percentage of residents within 30 minutes travel

#	SEA Objective	Decision making criteria: Will the option...		Indicators (this list is not exhaustive)
	to sustainable modes.			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	<b>Accessibility:</b> Reduce barriers for those living in rural areas.	Q10a	Will it increase provision of local services and facilities and reduce centralization?	Ease with which residents have access to key services
		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	<b>Housing:</b> 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		

#	SEA Objective	Decision making criteria: Will the option...		Indicators (this list is not exhaustive)
12	<b>Health, safety and wellbeing:</b> 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	<b>Economy:</b> 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



Historic England

WEST MIDLANDS OFFICE

Mr Joseph Evans  
Lepus Consulting Ltd  
1 Bath Street  
Cheltenham  
GL50 1YE

Direct Dial: 0121 625 6887

Our ref: PL00130862

13 August 2018

Dear Mr Evans

**CONSULTATION ON AMENDED ENVIRONMENTAL REPORT (SEA) FOR  
BRAILES NEIGHBOURHOOD PLAN**

Thank you for the above consultation. Overall Historic England considers the report to be a thorough and professional piece of work. We do not disagree with the conclusions reached and have no further substantive comments to make. I hope this is helpful.

Yours sincerely,

Peter Boland  
Historic Places Advisor  
peter.boland@HistoricEngland.org.uk

cc:



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TF

Telephone 0121 625 6870  
HistoricEngland.org.uk



Date: 28 August 2018  
Our ref: 253327  
Your ref: Brailes & Winderton Neighbourhood Development Plan SEA  
Environmental Report



Rosemary Williams  
Stratford on Avon District Council

**BY EMAIL ONLY**

[rosemary.williams@stratford-dc.gov.uk](mailto:rosemary.williams@stratford-dc.gov.uk)

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

Dear Rosemary

**Planning consultation:** LC320 Strategic Environmental Assessment of the Brailes NDP - Consultation

Thank you for your consultation on the above dated 23 July 2018 which was received by Natural England on 23 July 2018.

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 is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

**SEA Environmental Report**

Natural England welcomes the production of an Environmental Report. Having reviewed the report Natural England concerned that development allocations proposed in this Neighbourhood Plan have the potential to adversely impact the Cotswolds AONB and would like to make the following comments.

We note that proposed development allocation Site James 425e Sutton Lane in Table 4.1 "SEA Objective scoring matrix for all reasonable alternative sites" is rated to have only a "Likely adverse effect" on the landscape. It is unclear what justification criteria was used to reach this conclusion considering that this site deemed to have high-medium sensitivity to housing development according to Warwickshire County Council Architects (2016) Upper and Lower Brailes Landscape Additional Study Areas. The other allocations 189 Righton, 188 Taylor, 221 Compton West and Compton Estates 222 East were rated higher with a "Likely strong adverse effect" based on the same criteria of having high-medium sensitivity to housing development according to the above mentioned Study.

We note that due to revised boundaries the proposed development allocations Site Compton Estates 222 East and Site 189 Sutton Lane East were reassessed in the appraisal of the preferred approach as having a "Likely adverse effect" on the landscape.

Taking into consideration the above points raised we would highly recommend seeking an opinion of the Cotswolds AONB Board on the above assessments. Clarification at this early assessment stage may help to avoid objections raised at the planning application stages.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

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](mailto:consultations@naturalengland.org.uk).

Yours faithfully

Yana Burlachka  
Land use planning adviser  
Planning for a Better Environment – West Midlands

Stratford On Avon District Council

c/o Lepus Consulting  
1 Bath Street  
Cheltenham  
GL50 1YE

**Our ref:** UT/2007/101490/SE-  
26/FS1-L01

**Your ref:**

**Date:** 13 September 2018

Dear Sir/Madam

## **STRATEGIC ENVIRONMENTAL ASSESSMENT OF THE BRAILES NEIGHBOURHOOD PLAN**

### **ENVIRONMENTAL REPORT (JULY 2018)**

Thank you for referring the above report for comment, which was originally received via our central Enquiries Unit on 23 July 2018. We apologise for the delay in responding, and hope our comments are still of use.

The Environment Agency has reviewed the above Lepus report referenced LC-320 dated July 2018, within the context of the pre-submission draft Neighbourhood Development Plan which was also issued for information only. We have previously commented on the SEA for this neighbourhood plan on 04 May 2017 (in response to the screening opinion), 07 September 2017 (Scoping opinion) and 11 December 2017 (draft SEA).

The contents of this plan have been taken within the surrounding policy context of the adopted Stratford upon Avon Core Strategy (July 2016), with particular regard to policies *CS.2 - Climate Change and Sustainable Construction* and *Policy CS.4 Water Environment and Flood Risk*.

Having reviewed section 3.3 we can confirm that we consider the assumptions, limitations and consistencies used within the site assessments to be reasonable and fair, with a particular regard to SEA Objectives 3: biodiversity, 4: flooding, 5: climate change and 7: pollution.

We have reviewed the scores within Chapter 4, and cross-referenced with the Floodmap for Planning, and the Risk of Flooding from Surface Water mapping, and consider the scores for SEA4 representative. We note that the development sites brought forward are located out of the medium and high risk fluvial Flood Zones 2 and 3,

Environment Agency  
9, Sentinel House Wellington Crescent, Fradley Park, Lichfield, WS13 8RR.  
Customer services line: 03708 506 506

[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

Cont/d..

and as such comply with the NPPF's requirement to steer development away from areas at highest risk of flooding, and as such do not require the Sequential Test to be formally applied. There is however significant risk of surface water flooding across the plan area, which has still been taken into account within the scoring, representing the varying levels of risk represented by the 30 year, 100 year and 1000 year probability of flooding from surface water sources.

Para 6.2 examines the wider benefits supported by draft policy E1: Managing Local Water Environment and Flood Risk. We consider these to all be valid points, with particular note to the enhancement of biodiversity due to development being set-back from waterways. This policy should be read closely alongside adopted Core Strategy policy CS.4 for the full range of requirements, which include:

- Developers will be encouraged to reduce the reliance on hard engineered solutions through their site
- appropriate habitats buffers are established
- Culverts should be permitted for access purposes only
- All development proposed adjacent to a river corridor should be designed to take advantage of its proximity to the river through layout and orientation of buildings and spaces
- Physical and visual access to watercourses will be promoted where it respects the natural function of the watercourse and sensitive nature of the river corridor as a whole.

These policy requirements are particularly pertinent to allocation James 425e (Sutton Lane) which is bordered immediately by the Hen Brook, classified an ordinary watercourse.

We recommend that the comprehensive requirements of the overarching water management policy CS.4 are more clearly highlighted within the plan within the supporting text of Policy E1. Furthermore Policy E1 could be refined to provide a more locally-specific take on the flood risk requirements, detailing the watercourses affecting the neighbourhood plan area, and highlighting the complex nature of flooding. Evidence for this should be taken from the Stratford's Strategic Flood Risk Assessment (currently being updated) and other water based evidence identified within your Plans, Programmes and Projects.

In light of the above, we find the sustainability appraisal is appropriate to support this plan.

Yours faithfully

**Miss Jane Field**  
**Planning Specialist**

Direct dial 020 3025 3006

Direct fax 01543 444161

Direct e-mail [swmplanning@environment-agency.gov.uk](mailto:swmplanning@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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**LEPUS** CONSULTING  
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

© Lepus Consulting Ltd

1 Bath Street

Cheltenham

GL50 1YE

T: 01242 525222

E: [enquiries@lepusconsulting.com](mailto:enquiries@lepusconsulting.com)

W: [www.lepusconsulting.com](http://www.lepusconsulting.com)

CHELTENHAM

United Kingdom



Lepus Consulting  
1 Bath Street  
Cheltenham  
Gloucestershire GL50 1YE

t: 01242 525222  
w: [www.lepusconsulting.com](http://www.lepusconsulting.com)  
e: [enquiries@lepusconsulting.com](mailto:enquiries@lepusconsulting.com)