

Strategic Environmental Assessment of the Ilmington Neighbourhood Development Plan

Environmental Report

January 2019



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY



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Front photo: View from the Cotswolds AONB over Ilmington by Neil Davidson.

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 between December 2018 and January 2019 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 Ilmington Neighbourhood Development Plan (NDP) and meets the requirements of the SEA Directive. It is not intended to be a substitute for Environmental Impact Assessment (EIA) or Appropriate Assessment (AA).

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Contents

1	Introduction.....	6
1.1	Introduction.....	6
1.2	Purpose of this report.....	7
1.3	History of the Ilmington NDP.....	7
1.4	The SEA process.....	9
1.5	Best Practice Guidance.....	10
1.6	Structure of the NDP.....	10
1.7	Meeting the SEA Directive requirements.....	11
1.8	How the NDP SEA has evolved.....	15
1.9	Relationship with the Stratford-on-Avon District Core Strategy.....	17
2	Scoping.....	19
2.1	Introduction.....	19
2.2	Policies, plans and programmes review.....	20
2.3	Baseline data and information.....	20
2.4	The SEA Framework.....	20
3	Methodology.....	22
3.1	Approach to assessment.....	22
3.2	Appraisal process.....	22
3.3	Significance.....	25
3.4	Impact sensitivity.....	25
3.5	Impact magnitude.....	26
3.6	Predicting effects.....	27
3.7	Distances.....	27
3.8	Assessment assumptions.....	27
3.9	Limitations.....	29
3.10	Mitigation.....	30
4	Reasonable Alternatives.....	31
4.1	Introduction.....	31
4.2	Reasonable Alternatives: Sites.....	32
4.3	Reasonable alternatives: Do Nothing.....	36
4.4	Selection of reasonable alternatives.....	37
5	Preferred Option.....	43
6	Assessment of Effects Pre-Mitigation.....	46
6.1	Introduction.....	46
6.2	Policy HG.1: Housing Allocations.....	46
6.3	Policy HG.2: Strategic Reserve Site.....	49
6.4	Policy HG.3: Mabel's Farm Development.....	50
6.5	Policy HG.4: Relocation of Mabel's Farm.....	50
6.6	Policy HG.5: Sites 2 and 3.....	50
6.7	Policy HG.6: Strategic Reserve Site.....	51
6.8	Policy DC.1: Development within the Neighbourhood Area.....	51
6.9	Policy DC.2: Built Up Area Boundary.....	52
6.10	Policy DC.3: Infill within the Built-Up Area Boundary.....	52
6.11	Policy DC.4: Pedestrian and Access to Amenities.....	52
6.12	Policy DC.5: Valued Landscapes, Vistas and Skylines.....	53
6.13	Policy DC.6: Environmental Sustainability.....	53
6.14	Policy DC.7: Local Parking Standards and Traffic Management.....	54

6.15	Policy HA.1: Heritage and Archaeological Assets.....	54
6.16	Policy LGS.1: Local Green Spaces.....	54
6.17	Policy INF.1: Flooding	55
6.18	Policy INF.2: Foul Water Drainage Mitigation.....	55
6.19	Policy NE.1: Biodiversity, Wildlife and Habitat Conservation and Protection	56
6.20	Policy NE.2: Aquatic Habitats	56
6.21	Policy NE.3: Boundary Treatments and Landscaping	57
6.22	Policy NE.4: Allotments and Orchards.....	57
6.23	Policy NE.5: Tranquillity.....	57
6.24	Policy NE.6: Dark Skies	58
6.25	Policy ETA.1: Encouraging Local Employment.....	58
6.26	Policy ETA.2: Home-Working and Internet Connectivity.....	59
6.27	Policy ETA.3: Rural Tourism	59
6.28	Policy ETA.4: Sustaining Local Amenities.....	59
6.29	Policy ETA.5: Safe Walking and Cycling	59
6.30	Summary of policy assessments scores pre-mitigation.....	60
7	Mitigation and Residual Effects	62
7.1	Introduction.....	62
7.2	Cultural Heritage	62
7.3	Landscape	65
7.4	Water and Flooding.....	67
7.5	Summary of post mitigation effects	69
8	Monitoring.....	71
8.1	Monitoring proposals.....	71
9	Conclusions and Next Steps	73
9.1	Environmental Report.....	73
9.2	Next Steps.....	73
9.3	Commenting on the Environmental Report.....	75
Appendix A	Reasonable Alternatives Report	
Appendix B	SEA Framework	

Tables

Table 1.1: List of NDP policies in the NDP	13
Table 1.2: Meeting the requirements of the SEA Directive.....	14
Table 1.3: Statutory Consultee Responses on Screening Report	15
Table 2.1: Statutory Consultee Responses on Screening Report	19
Table 3.1: SEA Framework.....	22
Table 3.2: Guide to impact significance matrix.....	24
Table 3.3: Geographic scales of receptors	26
Table 3.4: Impact Magnitude.....	26
Table 3.5: Assumptions for each SEA objective.....	28
Table 4.1: SEA scoring matrices for reasonable alternative sites assessed in the Reasonable Alternatives Report pre-mitigation.	35
Table 4.2: Likely evolution of the environment without the adoption of Ilmington NDP.....	36
Table 4.3: Selection of reasonable alternatives	38
Table 6.1: SEA scoring matrices for policies proposed in the NDP pre-mitigation	61
Table 7.1: Cultural heritage mitigation within the NDP.....	63
Table 7.2: Landscape mitigation within the NDP	65
Table 7.3: Water and flooding mitigation within the NDP	68
Table 7.4: SEA scoring matrices for policies proposed in the NDP post mitigation and enhancement	70

Figures

Figure 1.1: The Key Stages of SEA in Neighbourhood Planning (DCLG 2015).....	12
Figure 4.1: Call for Sites map (Source: Call for Sites Report).	34
Figure 5.1: Map of site allocations proposed in the NDP (map taken from the NDP page 21, Figure 5)	45

Acronyms

AONB	Area of Outstanding Natural Beauty
DCLG	Department for Communities and Local Government
DEFRA	Department for Environment, Food and Rural Affairs
DPD	Development Plan Document
EA	Environment Agency
ER	Environmental Report
LCA	Landscape Character Area
NDP	Neighbourhood Development Plan
NNR	National Nature Reserve
NPPF	National Planning Policy Framework
ODPM	Office of the Deputy Prime Minister
PDL	Previously Developed Land
PPG	Planning Practice Guidance
PPP	Policies, Plans and Programmes
PRoW	Public Right of Way
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SM	Scheduled Monument
SPZ	Source Protection Zone
STW	Seven Trent Water

Non-Technical Summary

What is Strategic Environmental Assessment?

N1 Lepus Consulting has prepared this Strategic Environmental Assessment (SEA) Environmental Report of the Ilmington Neighbourhood Development Plan (NDP) on behalf of 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 negative 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 negative 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 Lepus Consulting undertook a screening assessment of the Ilmington NDP in July 2018¹ to determine whether the NDP should undergo SEA. This assessment determined that the NDP had the potential to lead to likely negative effects on the environment in terms of cultural heritage and landscape impacts. Therefore it was screened into the SEA process in accordance with the SEA Directive. Following a period of consultation on the Screening Report the Environment Agency requested that the water environment also be considered in the SEA.

The scoping stage

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

- Cultural heritage;
- Landscape; and
- Water and Flooding.

Assessment of reasonable alternatives

N8 The assessment of reasonable alternatives refers to the plan-making stage of exploring policy options. The Ilmington NDP Steering Group started the plan-making process with the identification of potential development sites, via a 'Call for Sites'. Each reasonable alternative site was appraised in the SEA Reasonable Alternatives Report (**Appendix A**).

¹ Lepus Consulting, 2018. Strategic Environmental Assessment and Habitats Regulation Assessment of the Ilmington Neighbourhood Development Plan. SEA and HRA Screening Document.

² Lepus Consulting, 2018. Strategic Environmental Assessment of the Ilmington Neighbourhood Development Plan. SEA Scoping Report.

Pre-submission NDP

- N9** Every policy within the pre-submission NDP and potential site allocation has been assessed against the SEA Framework to identify positive and negative impacts on each SEA Objective. The findings are presented in a scoring matrix format and are accompanied by an explanatory narrative about 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, negative or uncertain effects in relation to the SEA Objectives. The explanatory narrative within the accompanying tables is used to interpret the matrix findings.
- N10** The NDP presents the preferred approach, which includes 28 policies, three site allocations and one reserved site allocation 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 6**. This appraisal is followed by a cumulative effects assessment with recommendations made for avoidance, mitigation and enhancement where appropriate (**Chapter 7**).

Mitigation and Recommendations

- N11** In cases where potentially negative effects have been identified, mitigation suggestions have been given. 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 such as advocating design guides. In the case of this Environmental Report, mitigation has been supplied to help address potential negative effects in the assessment process so that, if possible, positive or no residual adverse 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 opportunities for an improvement in environmental performance may arise. Monitoring for the SEA should be integrated with other monitoring processes carried out for Stratford-on-Avon District Council's Core Strategy.

Conclusions

- N13** The SEA has identified both positive and negative environmental effects caused by the NDP. However, through applying a suite of mitigation and enhancement measures, it is possible to ensure that the residual significant negative effects are overcome and positive effects are enhanced. One uncertain effect remained following mitigation. This is associated with the relocation of Mabel's Farm. The

new location for the farm was unknown at the time of writing. Effects are summarised in **Table N.1**.

Next Steps

N14 This Environmental Report will be published alongside the Pre-Submission Consultation Plan 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 Act³ (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.

Table N.1: Anticipated residual effects of the NDP post mitigation.

Topic	Residual effects
Cultural Heritage	<ul style="list-style-type: none"> It is anticipated that there will be a change to the setting of features of cultural heritage importance, namely Ilmington Conservation Area and a number of Listed Buildings, due to development at the allocated sites. Impacts associated with this are anticipated to be negligible due to the implementation of Housing and Development and Development Criteria policies. Impacts on above and below ground features of archaeological importance will be mitigated through the implementation of the Heritage and Archaeological Assets policy. Development Criteria and Natural Environment policies, which promote implementation of the sensitive design, will ensure that future development is sensitively designed to minimise effects on the setting of historical features within the village.
Landscape	<ul style="list-style-type: none"> It is anticipated that there will be a change in the local character of the village as a result of development at allocated sites. This may affect the setting and views for users of the Cotswold Area of Outstanding Natural Beauty (AONB), Public Rights of Way (PRoW) and residents within the village itself. However, implementation of the Development Criteria policies will ensure that these impacts will be negligible The Future Housing and Development, Development Criteria, Local Green Space and Natural Environment policies, which promote implementation of sensitive design, prevent incursion of development into the countryside, safeguard valued landscapes, vistas and skylines and protect the setting of the Cotswold AONB will ensure that any future development within Ilmington will be sensitive to local landscape character.
Water and Flooding	<ul style="list-style-type: none"> The NDP is anticipated to direct residential development away from areas at risk of fluvial flooding.

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

Topic	Residual effects
	<ul style="list-style-type: none">• It is anticipated that the NDP will result in development within areas at risk of low and medium surface water flooding and adjacent to areas at high risk of surface water flooding. This is likely to exacerbate local surface water flooding issues. However, the implementation of the Infrastructure policies will reduce this impact to one of negligible significance.

1 Introduction

1.1 Introduction

1.1.1 Lepus Consulting is conducting a Strategic Environmental Assessment (SEA) of the Ilmington Pre-Submission Neighbourhood Development Plan (NDP), on behalf of Stratford-on-Avon District Council. 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 (ER) under the requirements of the SEA Directive. This represents Stage C of SEA (see **Figure 1.1**), according to the Office of the Deputy Prime Minister's (ODPM's) (2005) A Practical Guide to the SEA Directive⁴. 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 their environmental value. SEA is a statutory requirement for local DPD. 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.

⁴ 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 Ilmington Neighbourhood Plan Steering Group's preparation of the NDP. It is not the role of the SEA to decide which is the most appropriate form of the NDP, but instead to provide an assessment of the alternatives which should be given due consideration in the decision-making process and identify best performing options.

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 Ilmington 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 Stratford-on-Avon District Council on 26th April 2016 through the approval of the application to designate the NDP area which was based on the Parish boundary. The Ilmington NDP has subsequently been developed on behalf of Ilmington Parish Council by the Neighbourhood Planning Steering Group. Evidence gathering for the Plan has methodically and openly followed a process with the emphasis on extensive community engagement and researching and assessing the facts.
- 1.3.3 The Ilmington NDP Neighbourhood Planning Steering Group is formed of representatives from the Parish. Following its creation in January 2016 a number of surveys were undertaken to collect views on what residents would like to change about the area. These surveys included a Neighbourhood Area wide household questionnaire, consultation workshops, independent planning assessments, public meetings and extensive research into existing documentation. The results of these surveys were used to create a set of planning objectives which the Neighbourhood Planning Steering Group believed reflected most of the major planning concerns in the community, culminating in the Pre-Submission Consultation Plan.
- 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 Pre-Submission Plan. 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 Core Strategy 2011 – 2031⁵.

⁵ Stratford-on-Avon District Core Strategy 2011 – 2031. Available at: <https://www.stratford.gov.uk/templates/server/document-relay.cfm?doc=173518&name=SDC%20CORE%20STRATEGY%202011%202031%20July%202016.pdf>

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 on 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 Ilmington 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 Pre-Submission Plan. A SEA may be required, for example, where:
- The Ilmington area contains sensitive natural or heritage assets that may be affected by the proposals in the plan; or
 - The Ilmington 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** (see page 12), 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 have been utilised in preparing the SEA of the Ilmington 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 (2018) National Planning Policy Framework
- Department for Communities and Local Government (2015) Planning Practice Guidance [online], available at:
<http://planningguidance.planningportal.gov.uk/blog/guidance/>

1.6 Structure of the NDP

- 1.6.1 The Pre-Submission Consultation Neighbourhood Plan is presented in seven sections, as listed below:

- Section 1: Introduction;
- Section 2: The Role of the Neighbourhood Development Plan;
- Section 3: The Village and Parish of Ilmington;
- Section 4: Village Character Appraisal;
- Section 5: Vision;
- Section 6: Policies for Ilmington; and
- Section 7: Design Principles.

- 1.6.2 Section 6 contains the policies that were subject to assessment through the SEA process, which are presented in **Table 1.1**. They are related to seven themes:

- Future housing and development,
- Development criteria,
- Heritage and archaeological assets,
- Local green space,

-
- Infrastructure,
 - Natural environment, and
 - Economy, tourism and local amenities.

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.

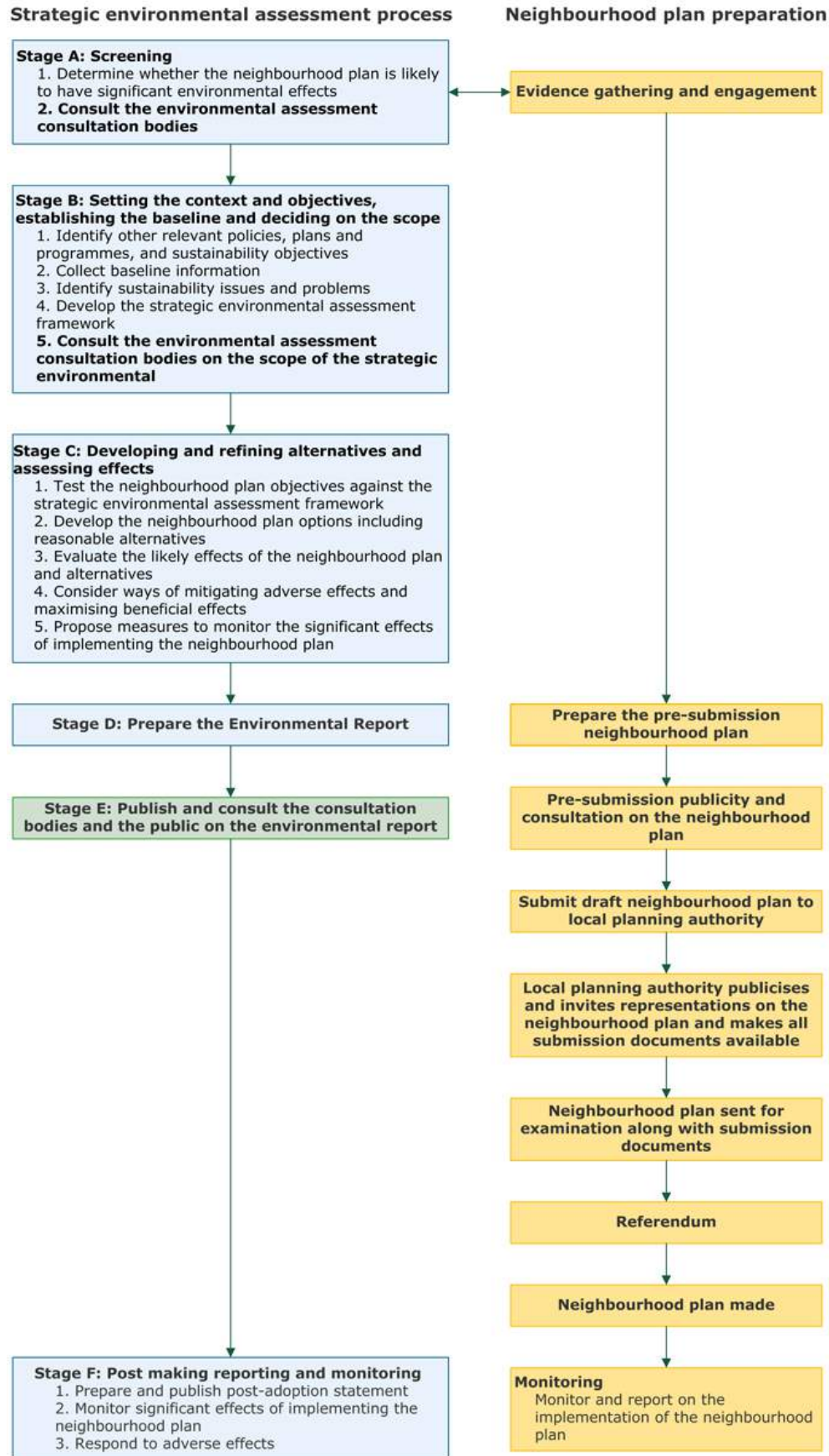


Figure 1.1: The Key Stages of SEA in Neighbourhood Planning (DCLG 2015)

Table 1.1: List of NDP policies in the NDP

Policy Number	Policy Name
Future Housing and Development	
HG.1	Allocation of Development Sites
HG.2	Strategic Reserve Site
HG.3	Mabel's Farm Development
HG.4	Relocation of Mabel's Farm
HG.5	Sites 2 and 3
HG.6	Strategic Reserve Site
Development Criteria	
DC.1	Development within the Neighbourhood Area
DC.2	Built-Up-Area Boundary
DC.3	Development within the Built-Up Area Boundary
DC.4	Pedestrian Access
DC.5	Valued Landscapes, Vistas and Skylines
DC.6	Environmentally Sustainability
DC.7	Local Parking Standards and Traffic Management
Heritage and Archaeological Assets	
HA.1	Heritage and Archaeological Assets
Local Green Spaces	
LGS.1	Local Green Spaces
Infrastructure	
INF.1	Flood Risk Reduction
INF.2	Foul Water Drainage Mitigation
Natural Environment	
NE.1	Biodiversity, Wildlife and Habitat Conservation and Protection
NE.2	Aquatic Habitats
NE.3	Boundary Treatments and Landscaping
NE.4	Allotments and Orchards
NE.5	Tranquillity
NE.6	Dark Skies
Economy, Tourism and Local Amenities	
ETA.1	Encouraging Local Employment
ETA.2	Home-Working and Internet Connectivity
ETA.3	Rural Tourism
ETA.4	Sustaining Local Amenities
ETA.5	Safe Walking and Cycling

Table 1.2: Meeting the requirements of the SEA Directive

Requirement for Environmental Report	Location
Include an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes.	SEA Scoping Report: Chapter 1 and Chapters 3 to 5 Environmental Report: Chapter 1
Include information on the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	SEA Scoping Report: Chapters 3 to 5 Environmental Report: Table 4.2
Describe the environmental characteristics of areas likely to be significantly affected	SEA Scoping Report: Chapters 3 to 5
Specify any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	SEA Scoping Report: Chapters 3 to 5 (Key Issues boxes) and Environmental Report: Chapters 7 to 9
Consider the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	SEA Scoping Report: Chapters 3 to 5 Scoping Report: Appendix B Environmental Report: Chapter 2
Assess the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, and cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	Environmental Report: Chapter 7
Give details of the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	Environmental Report: Chapter 7
Give an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Environmental Report: Chapter 4
Include a description of the measures envisaged concerning monitoring.	Environmental Report Chapter 7
Include a non-technical summary of the information provided.	Environmental Report Non-Technical Summary

1.8 How the NDP SEA has evolved

1.8.1 This report is part of a series of reports that have been prepared to facilitate an iterative and informative approach to SEA.

Stage A: Screening

1.8.2 Lepus Consulting undertook a screening assessment of the Neighbourhood Plan in July 2018⁶, to determine whether the NDP should be screened into the SEA process. This forms Stage A of the SEA process.

1.8.3 This assessment determined that the NDP had the potential to lead to likely negative effects on the historic and landscape environment. This was due to potential impacts of the NDP on the Cotswold Area of Outstanding Natural Beauty (AONB), Ilmington Conservation Area and Listed Buildings. It was therefore screened into the SEA process in accordance with the SEA Directive.

1.8.4 Following consultation on the Screening Report the Environment Agency recommended that, given the flooding history of the area, the water environment should also be included for further consideration in the SEA.

1.8.5 Consultation responses on the screening report are summarised in **Table 1.3**. This table also illustrates how comments have been incorporated into the SEA process.

Table 1.3: Statutory Consultee Responses on Screening Report

Consultee	Summary of Consultee Response	Incorporation of comment into SEA
Environment Agency	We concur with the conclusions of the report. We note policies INF1, NF2 and NE2, and welcome that the three site allocations are located outside the mapped fluvial flood zones, however recommend that given the flooding history within this area, and the issues regarding mains foul drainage infrastructure that the water environment is also included for further consideration within the SEA. This will ensure that the plan complies with Stratford upon Avon Council's requirements to ensure that the EU Water Framework Directive is complied with in its plan-making, and that as such the plan supports the objectives of the Severn River Basin Management Plan. It must be ensured that the plan does not result in any detriment to the water	Water and Flooding SEA Objective included into the assessment.

⁶ Ibid

Consultee	Summary of Consultee Response	Incorporation of comment into SEA
	environment, particularly through the discharge or treatment of foul effluent affecting water quality.	
Natural England	Natural England notes and concurs with the screening outcome i.e. that a SEA is required. Habitats Regulations Assessment Screening: Natural England notes the screening process applied to this Neighbourhood plan. We agree with the Council's conclusion of no likely significant effect upon the named European designated site: • Bredon Hill SAC	n/a
Historic England	Historic England concurs with your view that the preparation of a Strategic Environmental Assessment is required.	n/a

Stage B: Scoping

1.8.6 Preparing a Scoping Report represents Stage B 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 Ilmington and use this information to develop a framework against which to assess environmental impacts of the plan. The Scoping Report was prepared by Lepus Consulting in October 2018⁷.

1.8.7 The Scoping Report identified relevant plans, policies and programmes (PPPs) relating to environmental issues in Ilmington. It 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**.

⁷ Ibid

Stage C: Developing and Refining Alternatives and Assessing Effects

- 1.8.8 A Call for Sites was issued by the Parish Council in January and August 2017. This gave all landowners within the NDP area the opportunity to bring forward sites in the area for assessment in the Neighbourhood Planning Process. Twenty-five sites were offered for assessment. These sites were assessed for significant environment effects as part of the SEA process through an assessment of reasonable alternatives. The outcome of this assessment was presented to the Neighbourhood Planning Steering Group for consideration. The findings from these assessments are presented in **Chapter 4** and are provided at **Appendix A**.

Stage D: Prepare the Environmental Report

- 1.8.9 This report presents a SEA of the Pre-Submission Consultation Plan. This represents Stage D of the SEA process, as described in **Figure 1.1** and also documents Stage C, as described in **Chapter 4**.

Stage E: Publish and Consult the Consultation Bodies and the Public on the Environmental Report

- 1.8.10 The Pre-Submission Consultation Plan has been consulted on and any comments will be taken into account going forward to the Submission stage (Stage E of the SEA Process, see **Figure 1.1**).

Stage F: Post Making Reporting and Monitoring

- 1.8.11 Once the NDP has been formally adopted, a 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 F of the SEA process (see **Figure 1.1**).

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

- 1.9.1 The Stratford-on-Avon District Core Strategy was adopted on 11th July 2016 and sets out planning policy for the District. This forms the key planning document for Stratford-on-Avon District as a whole. The Development Plan 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 form part of the statutory Development Plan and set out the blueprint for future planning decisions in Ilmington.
- 1.9.3 The NDP is complementary to the Development Plan and provides more detailed policies, rather than alternative policies that would negate the Development Plan. The Stratford-on-Avon District Core Strategy was subject to a Sustainability Appraisal (SA), which assessed the likely implications of the 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 scoping stage represents Stage B 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 an 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 Framework and Objectives), and establish the baseline data and other information, including a review of relevant PPPs. The scoping process identifies key issues, highlighting areas of potential concern.
- 2.1.3 The Scoping Report was prepared by Lepus Consulting in October 2018⁸. 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 **Table 2.1**.

Table 2.1: Statutory Consultee Responses on Screening Report

Consultee	Summary of Consultee Response	Incorporation of comment into SEA
Environment Agency	Having had a quick look at your scoping report it is apparent that the triggers for a SEA in this instance were in fact related to Landscape and Cultural Heritage, as such I feel that we would not have significant comments to make given the sites proposed were outside the flood zones.	n/a
Natural England	We have no substantive concerns as to the contents of the document and consider the evidence base for the SEA, the identified key issues and the proposed SEA framework to be well thought out and fit for purpose.	n/a
Historic England	Natural England generally welcomes the scoping report for the Ilmington Neighbourhood Plan and considers that the methodology and baseline information used to inform the report appears to meet the requirements of the SEA Directive (2001/42/EC) and associated guidance. Natural England generally supports the sustainability objectives contained within the framework as they satisfactorily cover our interests in the natural environment.	n/a

⁸ Ibid

2.2 Policies, plans and programmes review

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

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

2.3 Baseline data and information

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

2.3.2 The baseline chapters in the Scoping Report (**Chapters 3 to 5**) 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 Ilmington 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 Directive⁹ 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 B**.

⁹ 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 process has used the SEA Framework (**Appendix B** and summary in **Table 3.1**), 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 policy and allocation. Assessments have been undertaken using this empirical evidence and, to a lesser extent, expert judgement. The precautionary principle¹⁰ is applied to all assessments.

Table 3.1: SEA Framework

	Objective	Description
1	Cultural Heritage	Protect, enhance and manage heritage assets, including designated and non-designated, as well as features and areas of archaeological, historical and heritage importance.
2	Landscape	Protect, enhance and manage the character, appearance and distinctiveness of the landscape including their key features and special qualities.
3	Water and Flooding	Reduce the number of people at risk of flooding whilst protecting and enhancing water quality.

3.2 Appraisal process

3.2.1 When evaluating significance of effect, the SEA draws on criteria in Annex II of the SEA Directive (see **Box 3.1**) and identifies a significance value using the guide in **Table 3.2**.

¹⁰ Judgment of 7 September 2004 in case C-127/02 (Waddenzee, paragraph 45).

Box 3.1: Annex II of the SEA Directive¹¹

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.

¹¹ EU Council (2001) Directive 2001/42/EC of the European Parliament and of the Council. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN> [Date Accessed: 11/09/18]

Table 3.2: Guide to impact significance matrix

Significance	Definition (not necessarily exhaustive)
Major Negative --	<p>The size, nature and location of a reasonable alternative would be likely to:</p> <ul style="list-style-type: none"> • Permanently degrade, diminish or destroy the integrity of a quality receptor, such as a feature of international, national or regional importance; • Cause a very high-quality receptor to be permanently diminished; • Be unable to be entirely mitigated; • Be discordant with the existing setting; and/or • Contribute to a cumulative significant effect.
Minor Negative -	<p>The size, nature and location of a reasonable alternative would be likely to:</p> <ul style="list-style-type: none"> • Not quite fit into the existing location or with existing receptor qualities; and/or • Affect undesignated yet recognised local receptors.
Negligible 0	Either no impacts are anticipated, or any impacts are anticipated to be negligible.
Uncertain +/-	It is entirely uncertain whether impacts would be positive or adverse.
Minor Positive +	<p>The size, nature and location of a reasonable alternative would be likely to:</p> <ul style="list-style-type: none"> • Improve undesignated yet recognised receptor qualities at the local scale; • Fit into, or with, the existing location and existing receptor qualities; and/or • Enable the restoration of valued characteristic features.
Major Positive ++	<p>The size, nature and location of a reasonable alternative would be likely to:</p> <ul style="list-style-type: none"> • Enhance and redefine the location in a positive manner, making a contribution at a national or international scale; • Restore valued receptors which were degraded through previous uses; and/or • Improve one or more key elements/features/characteristics of a receptor with recognised quality such as a specific international, national or regional designation.

3.2.2

A single value from **Table 3.2** is allocated to each SEA Objective for each policy and allocation. Justification for the score is presented in an accompanying narrative assessment text. The assessment of a significant effect is in accordance with the footnote of Annex 1(f) of the SEA Directive, where feasible, which states:

“These effects should include secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects”.

3.2.3 When selecting a single value to best represent the environmental performance of the relevant SEA Objective, the precautionary principle is used. This is a worst-case scenario approach. If a positive effect is identified in relation to one criterion within the SEA Framework (see the second column of the SEA Framework in **Appendix A**) and a negative effect is identified in relation to another criterion within the same SEA Objective, the overall score will be negative for that objective.

3.2.4 The assessment considers, on a strategic basis, the degree to which a location can accommodate change without detrimental effects on known receptors (identified in the baseline).

3.3 Significance

3.3.1 Where an environmental impact has been identified, the significance of effect has been categorised as minor or major. **Table 3.2** lists the significance matrix and explains the terms used. The nature of the significant effect can be either positive or negative depending on the type of development and the design and mitigation measures proposed.

3.3.2 Each policy and allocation that has been assessed in this report is awarded a score for each SEA Objective in the Framework, as per **Table 3.1**. Scores are not intended to be summed.

3.3.3 It is important to note that the scores are high level indicators. The narrative assessment text which details the key decision-making criteria behind each awarded score should always read alongside the score. Assumptions and limitations in **Section 3.8** offer further insight into how each score was arrived at.

3.3.4 Significance of effect is a combination of impact sensitivity and magnitude.

3.4 Impact sensitivity

3.4.1 Impact sensitivity is measured through consideration as to how the receiving environment will be impacted by a plan proposal. This includes assessment of the value and vulnerability of the area, whether or not environmental quality standards will be exceeded, and if impacts will affect designated areas or landscapes.

3.4.2 A guide to the range of scales used in the impact significance matrix is presented in **Table 3.3**. For most receptors, sensitivity increases with geographic scale.

Table 3.3: *Geographic scales of receptors*

Scale	Typical criteria
International/national	Designations that have an international aspect or consideration of transboundary effects beyond national boundaries. This applies to effects and designations/receptors that have a national or international dimension.
Regional	This includes the regional and sub-regional scale, including county-wide level and regional areas.
Local	This is the district and neighbourhood scale.

3.5 Impact magnitude

3.5.1 Impact magnitude relates to the degree of change the receptor will experience, including the probability, duration, frequency and reversibility of the impact. Impact magnitude is determined based on the susceptibility of a receptor to the type of change that will arise, as well as the value of the affected receptor (see **Table 3.4**).

Table 3.4: *Impact Magnitude*

Impact magnitude	Typical criteria
High	Likely total loss of or major alteration to the receptor in question; <ul style="list-style-type: none"> • Provision of a new receptor/feature; or • The impact is permanent and frequent.
Medium	Partial loss/alteration/improvement to one or more key features; or The impact is one of the following: <ul style="list-style-type: none"> • Frequent and short-term; • Frequent and reversible; • Long-term (and frequent) and reversible; • Long-term and occasional; or • Permanent and occasional.
Low	Minor loss/alteration/improvement to one or more key features of the receptor; or The impact is one of the following: <ul style="list-style-type: none"> • Reversible and short-term; • Reversible and occasional; or • Short-term and occasional.

3.6 Predicting effects

3.6.1 SEA is a tool for predicting potential significant effects. Predicting effects relies on an evidence-based approach and incorporates expert judgement. It is often not possible to state with absolute certainty whether effects will occur, as many impacts are influenced by a range of factors such as the design and the success of mitigation measures.

3.6.2 The assessments in this report are based on the best available information, including that provided to us by the Neighbourhood Planning Steering Group and information that is publicly available. Every attempt has been made to predict effects as accurately as possible.

3.6.3 SEA operates at a strategic level which uses available secondary data for the relevant SEA Objective. All policies and allocations are assessed in the same way using the same method. Sometimes, in the absence of more detailed information, forecasting the potential impacts of development can require making reasonable assumptions based on the best available data and trends. However, all policies and allocations must be assessed in the same way and any introduction of site-based detail should be made clear in the SEA report as the new data could potentially introduce bias and skew the findings of the assessment process.

3.7 Distances

3.7.1 Where distances have been measured, these are 'as the crow flies' from the furthest edge of the site unless specified otherwise.

3.8 Assessment assumptions

3.8.1 A number of assumptions have been used to help incorporate proportionality to the SEA of policies and allocations.

3.8.2 In terms of published policy guidance, it is assumed that the following policies will apply to the NDP area and surrounding environments, and have been borne in mind when completing the assessment:

- Adopted Stratford-on-Avon Core Strategy Policies (July 2016)¹²;

¹² Stratford-on-Avon Core Strategy (2016) Available at: <https://www.stratford.gov.uk/templates/server/document-relay.cfm?doc=173518&name=SDC%20CORE%20STRATEGY%202011%202031%20July%202016.pdf> [Date Accessed: 30.10.18].

- The Cotswolds AONB Management Plan (2018)¹³;
- NPPF (2018)¹⁴ planning policies; and
- PPG policies.

3.8.3 Other assumptions have been applied to the report based on discussions with the plan makers and the client team. These are presented in **Table 3.5**.

Table 3.5: Assumptions for each SEA objective

SEA Objective	Assessment Assumptions
Cultural Heritage	<p>If a site is in close proximity to a heritage asset, development at that location has the potential to alter the character or setting of the asset, even if the site is not visible from the heritage asset. Impacts on the setting or character of heritage assets will be largely determined by the specific layout and design of development proposals.</p> <p>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.</p> <p>Sites containing, or in close proximity to, areas of ‘high archaeological sensitivity’ as defined by the Historical Environmental Assessment undertaken for Ilmington¹⁵, may benefit from further archaeological assessment to determine potential adverse effects which may not have been revealed by a desk-based assessment.</p>
Landscape	<p>Policies and allocations have been assessed in terms of the extent to which they may impact on the character of local landscapes and townscapes as well as the extent to which they may alter views.</p> <p>Baseline data on the landscape character has been derived from the National Character Areas. Ilmington is split between two National Character Areas (NCA): Cotswolds NCA and Dunsmore and Feldon NCA¹⁶.</p>
Water and Flooding	<p>The level of fluvial flood risk present at each site is based on the Environment Agency’s flood risk data, such that:</p> <ul style="list-style-type: none"> • Flood Zone 3: 1% - 3.3+% chance of flooding each year; • Flood Zone 2: 0.1% - 1% chance of flooding each year; and

¹³ Cotswold Area of Outstanding Natural Beauty Management Plan 2018 – 2023 (2018). Available at: <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2018/10/Cotswolds-AONB-Management-Plan-2018-2023.pdf> [Date Accessed: 30.10.18].

¹⁴ National Planning Policy Framework (2018). Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf [Date Accessed: 30.10.18].

¹⁵ Historic Environment Assessment of Local Service Villages, Stratford-on-Avon District 2012, Section 4.16.9

¹⁶ Natural England (2014) National Character Areas. Available at: <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making> [Date Accessed: 10/09/18]

SEA Objective	Assessment Assumptions
	<ul style="list-style-type: none"> Flood Zone 1: Less than 0.1% chance of flooding each year. <p>There is the possibility of higher flood risks elsewhere if a site is adjacent to Flood Zones 2 or 3.</p> <p>Surface water flood risk: Areas of high risk have more than a 3.3% chance of flooding each year, medium risk between 1% - 3.3%, low risk between 0.1% and 1% and very low risk less than a 0.1% chance.</p> <p>The risk of groundwater flooding is unknown for all sites.</p>

3.9 Limitations

- 3.9.1 The assessment of reasonable alternatives and the preferred option is limited in terms of available data resources. For example, up to date ecological surveys and/or landscape and visual impact assessments have not been available.
- 3.9.2 Data granularity is sometimes an issue where a dataset does not match the scale of some smaller sites. For example, national character area profiles cover larger areas than the relatively small allocated sites. This restricts the ability of the SEA process to differentiate between sites when assessing their impact on the area profile.
- 3.9.3 All data used is secondary data available from the client team, the Neighbourhood Planning Steering Group or publicly available web-based information.
- 3.9.4 Properties close to or adjacent to potential development sites were not accessed in order to gain views and evaluate impacts.

3.10

Mitigation

3.10.1

Mitigation has been considered in hierarchy approach. Mitigation aims to reduce identified adverse environmental effects. 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 such as advocating design guides. An assessment has then been made to determine residual impacts following the implementation of mitigation.

4 Reasonable Alternatives

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-making process.

4.1.4 The results of a SEA may reveal that there is no single, best performing option. Where there is no obvious discernible difference at a strategic scale this will be documented in the SEA process.

4.1.5 PPG¹⁷ 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”*.

¹⁷ Department for Communities and Local Government (2015) Planning Practice Guidance Paragraph: 018 Reference ID: 11-018-20140306

4.2 Reasonable Alternatives: Sites

4.2.1 PPG notes that ‘reasonable alternatives’ are the different realistic options considered by the plan-maker in developing the policies in its plan. It notes that the SEA process should provide conclusions on the overall sustainability of the different alternatives and that the alternatives must be realistic and deliverable¹⁸.

4.2.2 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*”¹⁹.

Call for Sites

4.2.3 In December and July 2017 Ilmington Neighbourhood Planning Steering Group undertook a ‘Call for Sites’ exercise in order to identify potential sites for inclusion as allocations within the emerging Ilmington Neighbourhood Plan. A total of 25 sites were offered for assessment.

4.2.4 Submitted sites were visited and assessed by the Neighbourhood Planning Working Group. This assessment applied the following locally established criteria assembled from evidence gathering and community consultation.

- A preference for previously developed land.
- Not prominent in the landscape; for example, not on rising land;
- Has satisfactory highway access and may provide an opportunity to alleviate traffic issues and hazards.
- Can provide off-street parking.
- Is well-connected to existing village amenities, for example the Village Shop, School, Playing Fields, Pubs and Bus Stop.
- Not at high risk of flooding: cross-referenced with the Environmental Agency Surface Water Flood Risk Map.
- Not cause harm to the setting of Listed Buildings, the Area of Outstanding Natural Beauty or Ilmington Conservation Area unless that harm is clearly outweighed by other material planning considerations.

¹⁸ Ibid

¹⁹ Department for Communities and Local Government (2015) Planning Practice Guidance. Paragraph: 037 Reference ID: 11-037-20150209

- Available for development and without known impediment to development.
- Does not cause harm to important views, designated green spaces, valued landscapes, residential amenities or habitats, unless that harm is clearly outweighed by other material planning considerations.

4.2.5 The Call for Sites Report²⁰ identifies the outcomes of the site assessment process. This exercise informed the site allocation process by the Neighbourhood Plan Steering Group and future consultation with the local community.

4.2.6 The 25 alternative sites were identified in the Call for Sites process as shown in **Figure 4.1**. These sites were identified as reasonable alternatives for the Ilmington NDP. All the sites were therefore assessed as per the methodology set out in **Chapter 3**. The results of this assessment are set out within the Assessment of Reasonable Alternatives Report (**Appendix A**)²¹.

²⁰ Ilmington Neighbourhood Plan Working Group (2018) Report on Call for Sites Exercise.

²¹ Lepus Consulting (2018). Assessment of Reasonable Alternatives.

4.2.7 The scoring matrix for each site assessed in the Reasonable Alternatives Report has been brought together in **Table 4.1**. It is noted that this forms an assessment of effects at each site before the consideration of mitigation.

Table 4.1: SEA scoring matrices for reasonable alternative sites assessed in the Reasonable Alternatives Report pre-mitigation.

Site reference number	SEA Objective		
	Cultural Heritage	Landscape	Water and Flooding
CFS 1	0	0	0
CFS 2	0	0	0
CFS 3	0	0	0
CFS 4	-	-	0
CFS 5	-	0	0
CFS 6	-	0	0
CFS 7	0	0	+
CFS 8	-	-	+
CFS 9	-	0	-
CFS 10	-	-	--
CFS 11	-	--	+
CFS 12	-	--	--
CFS 13	-	--	--
CFS 14	--	--	+
CFS 15	-	-	+
CFS 16	-	0	+
CFS 17	-	--	0
CFS 18	--	--	-
CFS 19	-	0	0
CFS 20	0	--	--
CFS 21	+/-	--	0
CFS 22	-	0	-
CFS 23	+/-	--	0
CFS 24	0	--	--
CFS 25	-	-	--

- 4.2.8 The reasonable alternatives assessment pre-mitigation scoring matrix shows that groups of sites identified through the ‘Call for Sites’ perform in similar ways. These similarities are due to the proximity of some sites to one another (such as CFS1 – CFS 8 and CFS 21 and CFS 23) and the fact that all sites are proposed for the same land use change. Differences are however apparent between alternative locations within Ilmington.
- 4.2.9 In terms of cultural heritage impacts, CFS 1, 2, 3, 7, 20 and 24 would be likely to have negligible impacts on historic assets. These sites are located furthest from the Ilmington Conservation Area and Listed Buildings within the village, which reduces the possibility that development at these locations would result in a significant negative impact on local heritage assets.
- 4.2.10 In terms of landscape there are ten sites which would be expected to have negligible impacts on the landscape objective. Of these, CFS 1, 2 and 3 are likely to be the best performing options as the development proposed would be a replacement of an existing dwelling or farm outbuilding, and therefore, would be unlikely to alter the current character of the local landscape.
- 4.2.11 In terms of water and flooding, CFS 7, 8, 11, 14, 15 and 16 have been identified as the best performing sites as none of the sites are at any risk of fluvial or pluvial flooding. Development at these locations would be likely to ensure new residents are not placed in locations at risk of fluvial or pluvial flooding.

4.3 Reasonable alternatives: Do Nothing

- 4.3.1 As part of the assessment of reasonable alternatives consideration has been given to the impact of a do-nothing scenario i.e. without implementation of the NDP. This assessment assumes that policies outlined in the Stratford-on-Avon Core Strategy and other high-level policies and plans will continue to be implemented.

Table 4.2: Likely evolution of the environment without the adoption of Ilmington NDP

SEA Topic	Score	Evolution without the Plan
Cultural Heritage	-	In the absence of the NDP, the character and setting of designated and non- designated heritage assets is unlikely to change significantly, primarily due to policies set out in the Stratford-on-Avon Local Plan. However, it is uncertain as to the extent to which the accessibility, local awareness or setting of heritage assets may be enhanced over time.

SEA Topic	Score	Evolution without the Plan
		In the absence of the NDP it is likely that unknown below ground features of archaeological importance will be protected through Stratford-on-Avon's Core Strategy through Core Strategic Policy CS.8.
Landscape	-	<p>In the absence of the NDP, the local distinctive and rural landscape character would be unlikely to be altered. Key landscape features of the Wold Landscape Character Area (LCA) such as arable fields would be likely to be preserved in the absence of the NDP through policies set out in the Stratford on Avon District Local Plan, although it is uncertain the extent to which important landscape features of Ilmington would be enhanced.</p> <p>The Cotswolds AONB will continue to be proactively and effectively managed by the Cotswold Conservation Board and, in the absence of the NDP, would be likely to be conserved and enhanced through the Cotswold AONB Management Plan 2018 - 2023²².</p> <p>In the absence of the NDP, it is uncertain the extent to which distinctive and long-distance countryside views enjoyed by sensitive receptors, including local residents and those on the local PRoW network would be likely to change. Policies set out in the Stratford-on-Avon District Local Plan (such as Core Strategic Policy CS.5) would be likely to protect some views but may not be specific to Ilmington Parish. Without proactive management to preserve landscape features and open space, the quality of these views could potentially deteriorate over time.</p>
Water and Flooding	0	<p>In the absence of the NDP, it is considered that, in line with Stratford-on-Avon Core Strategy Policy CS.4 new development would not be allocated in areas at risk of fluvial or surface water flooding and therefore the number of residents at risk of flooding is unlikely to change in the short or medium term. In the long term, climate change will be likely to exacerbate flood risk for local residents to some extent.</p> <p>The EA will continue to pursue water quality improvements for surface and ground water bodies in the Warwickshire Avon catchment. The ecological and chemical status of each waterbody would be likely to improve to some extent over the coming years in line with requirements of the Water Framework Directive.</p>

4.4 Selection of reasonable alternatives

4.4.1 As noted above PPG states that the environmental report accompanying the NDP should outline the reasons alternatives were selected and the reasons the rejected options were not taken forward. **Table 4.3** provides a summary of this process. The reasons for site selection / rejection has been informed by the Neighbourhood Planning Steering Group assessment and the SEA of reasonable alternatives.

²² Ibid

Table 4.3: Selection of reasonable alternatives

Reasonable Alternative	Selected / Rejected	Reason for Selection / Rejection ²³
Do Nothing	Rejected	The do nothing alternative would deliver none of the benefits that are enabled by the NDP and are supported by the community. These include ensuring that Ilmington continues to be a desirable place to live, whilst protecting its valuable historic and landscape features.
CFS 1	Selected	<p>The owners of Mabel’s Farm submitted 8 separate parcels of land for assessment. The individual parcels of land were assessed separately; however they are considered here as a whole as they comprise one planning unit (the farm and associated land). The parts of the site covered by Mabel’s Farm buildings are previously developed. High quality development at the site provides the opportunity to improve the appearance of the site which was classified by the Conservation Area Review²⁴ as an “eyesore” which detracts from the character and appearance of the Cotswold AONB. The site has 2 existing access points. There is potential to create an additional access point from Mickleton Road to take traffic away from Back Street (where traffic and parking issues have been identified). The site relates well to the village; being close to facilities (primary school, playing fields, pub and village shop). Parts of the site are located within an area of low-risk of surface water flooding, other parts of the site are not at risk of surface water flooding. The site is located within Flood Zone 1 which would ensure residents are not exposed to flood risk. The site lies within the AONB, however, the site is relatively flat and unconstrained by topography. The Landscape Sensitivity Assessment²⁵ classified the area as being of medium sensitivity to housing development (reference parcel IM12 which includes sites CFS1 to 8).</p> <p>A number of site parcels within this area were assessed as having negligible or positive impacts on the SEA objectives within the SEA Assessment of Reasonable Alternatives (Appendix A) - including; CFS 1,2,3 and 7 for cultural heritage (due to distance from the Ilmington Conservation Area), CFS 1,2 and 3 for landscape (due to replacement of existing buildings) and CSF 7 and 8 for flooding (due to absence of fluvial and pluvial flooding risks).</p> <p>The assessment noted that a number of the parcels of land were dependant on the development of others for access and were not suitable for consideration in isolation. Development closer to Back Street (CSF 1, 2, 3, 4 and (in part) 5) was therefore preferred but some development on parcels CSF 6, 7 and 8 was considered where it related well to the rest of the development and allowed cluster development.</p> <p>The assessment recommended an area of 1.25 ha within the site comprising CSF 1 – 7 and part of 8 be selected for inclusion in the NDP. It was also recommended that the remaining 0.5ha of CSF4 be included as a Strategic Reserve Site in the NDP.</p>
CFS 2		
CFS 3		
CFS 4		
CFS 5		
CFS 6		
CFS 7		
CFS 8		
CFS 9	Rejected	Sites CSF 9 – 12 comprise 4 individual parcels of land that make up a wider agricultural field at the north eastern edge of the village south

²³ Justifications for rejection / selection of alternatives is taken from the ‘Ilmington Neighbourhood Plan Working Group Report on Call for Sites Exercise (April 2018)’.

²⁴ Stratford-on-Avon District Council (1995). Conservation Review.

²⁵ White Consultants (2012). Landscape Sensitivity Assessment.

Reasonable Alternative	Selected / Rejected	Reason for Selection / Rejection ²³
CFS 10		<p>and east of Wilkin's Way. The site has existing access from Shipston Road, however to avoid poor connectivity with the village new pedestrian access would be required. The Landscape Sensitivity Assessment classed this site as being of medium sensitivity to development. The site is not well contained in landscape terms. In the SEA the 4 parcels of land were assessed as having between negligible to major adverse impacts on the landscape environment due to impacts on views from existing Public Rights of Way (PRoWs) and the presence of non-designated ridge and furrow at this location. The site is not constrained by Listed Buildings, is not located within the Conservation Area or within the AONB. In terms of the site's performance against the cultural heritage objective of the SEA minor negative impacts were associated with views to / from the Conservation Area and the loss of the non-designated ridge and furrow feature at this location. The site is not well connected to village services and amenities. Parts of the site are located in areas of low to high risk of surface water flooding, with CSF 10 and 12 resulting in major negative impacts when assessed against the water and flooding SEA objective. The site was not supported by parishioners who attended the Workshops. The site was therefore not taken forward for further consideration in the NDP.</p>
CFS 11		
CFS 12		
CFS 13	Rejected	<p>CSF 13 is located on the northern tip of the village with existing access to Cross Leys Farm off Front Street. The site is currently an agricultural field. The Landscape Sensitivity Assessment classed this site as being of medium to high sensitivity to development. The site is not well contained in landscape terms, being exposed on all sites to wider views. The SEA assessment of reasonable alternatives identified major negative impacts of development at this site on the setting of the adjacent Cotswold AONB and views to / from PRoWs. In terms of cultural heritage, the SEA concluded that development at this location had the potential to adversely alter the setting of Ilmington Conservation Area. Parts of the site are located within an area of high-risk surface water flooding and the SEA therefore concluded major adverse impacts on the water environment from development at this location. The site was not supported by parishioners who attended the Workshops. The site was therefore not taken forward for further consideration in the NDP.</p>
CFS 14	Rejected	<p>The site comprises agricultural fields with an existing access behind Bennett Place. The site is located within the AONB and Ilmington Conservation Area (western part only). The site slopes upwards to the east. The Landscape Sensitivity Assessment notes that the site forms a distinctive rural green edge, forming the local skyline and backdrop. The Centenary Way runs over the hill connecting a key part of the village to the wider countryside. These sensitivities mean that housing was considered to be inappropriate in this zone. The SEA Assessment of Reasonable Alternatives notes that due to the sites location adjacent to the AONB, its current greenfield nature and the conclusions of the Landscape Sensitivity Assessment that development at this location would result in a major negative impact on landscape. In terms of cultural heritage the SEA noted that the site is partially within the Ilmington Conservation Area and therefore development at this location would have major adverse impacts on the setting of the Conservation Area and Listed Buildings.</p> <p>The site was not supported by parishioners who attended the Workshops. The site was therefore not taken forward for further consideration in the NDP.</p>

Reasonable Alternative	Selected / Rejected	Reason for Selection / Rejection ²³
CFS 15	Rejected	<p>The site comprises agricultural land with an existing access off Back Street. Public footpaths run along the western boundary of the site and across the site's north western tip. The Landscape Sensitivity Assessment notes that the site is located within an area of medium sensitivity to housing development. In terms of cultural heritage, the SEA Assessment of Reasonable Alternatives concluded that development at this location would result in a minor adverse effect on the setting of Listed Buildings and the Conservation Area. In terms of landscape, the SEA concluded that development at this location would have a minor adverse effect due to the impact on views to / from the AONB and PRowS. The site is not located within an area at risk of surface water or fluvial flooding.</p> <p>The site was neither strongly favoured nor strongly supported by the majority of Workshops attendees. The site was not taken forward for further consideration in the NDP due to landscape considerations and the availability of more suitable alternative sites.</p>
CFS 16	Rejected	<p>The site comprises a small parcel of land in the centre of the village within the Conservation Area and within the AONB. The SEA Assessment of Reasonable Alternatives concludes minor adverse effects on the cultural heritage objective due to setting impacts on the Ilmington Conservation area and a number of Listed Buildings. There is no current access to the site. Development at this location would result in the loss of remnant orchard which makes a positive contribution to the character of the village. Based on access issues and the presence of the remnant orchard the site was not taken forward for further consideration in the NDP.</p>
CFS 17	Rejected	<p>The site comprises an agricultural field. There is no existing access to Front Street and Featherbed Lane, with current access from Elm Close. This is a small cul-de-sac with limited potential to access more than a few houses. The site is not located within the Conservation Area, however the SEA Assessment of Reasonable Alternatives notes that development at this location may have a minor adverse effect on its setting. The site is not located within the AONB but is 50m way from it at its closest point. The SEA notes that the site is located within an area of high sensitivity to housing development and that development at this location could have a major adverse effect on views to / from the AONB.</p> <p>The site was largely not supported by parishioners who attended the Workshops. The site was therefore not taken forward for further consideration in the NDP.</p>
CFS 18	Rejected	<p>The site is an agricultural field in open countryside to the south of Featherbed Lane and the lane to Compton Scorpion. The site is located within the AONB. The Landscape Sensitivity Assessment notes that the site is located within an area of high sensitivity to housing development. The SEA Assessment of Reasonable Alternatives concluded that impacts associated with development at this location would be major adverse due to its potential to alter views to / from sensitive receptors. The site is on the periphery of the village and not well connected to village amenities.</p> <p>Due to landscape and connectivity issues the site was not taken forward for further consideration in the NDP.</p>

Reasonable Alternative	Selected / Rejected	Reason for Selection / Rejection ²³
CFS 19	Rejected	<p>This site comprises the garden of a Grade II Listed Building in the centre of the village off Front Street. Existing access is obtained off Front Street. The site is a remnant orchard. The site is located within the Ilmington Conservation Area. The SEA Assessment of Reasonable Alternatives concludes that development at this site would result in a major adverse effect on the setting of the Conservation Area and Listed Buildings within the village. In addition, the site is also Ilmington's last remaining burgage plot. Based on the above factors, the Steering Group determined that development at this site would be inappropriate because it makes an important contribution to the weave character of the village and the remnant orchard and medieval garden plot has local significance. For these reasons the site was not taken forward for further consideration in the NDP.</p>
CFS 20	Rejected	<p>The site is located on the north-eastern tip of the village. Although the site is not located within the AONB, the Landscape Sensitivity Assessment notes that the site is located within an area of medium sensitivity to housing development. The SEA Assessment of Reasonable Alternatives identified a major adverse effect on landscape as a result of development due to potential impacts on views to / from sensitive receptors. Parts of the site are located within a high-risk surface water flood zone and as such the SEA concluded a major adverse effect on the water and flooding objective. The site is at the periphery of the village and poorly connected to amenities. For these reasons the site was not taken forward for further consideration in the NDP.</p>
CFS 21	Selected	<p>The site comprises the property known as Nellands Cottage and part of an agricultural field to the south of Nellands Cottage. The site has an existing access from Featherbed Lane with good visibility. The site is reasonably well located in terms of access to village amenities. The site is located within the AONB. The Landscape Sensitivity Assessment notes that the site is located within an area of high / medium sensitivity to housing development. This refers to a small section of CSF 21. The site is predominantly greenfield and development at this site could alter the setting of the AONB. The SEA Assessment of Reasonable Alternatives concluded that development at this location could result in a major adverse effect on landscape. Feedback from the workshops indicated that relatively few people considered that development at this location was unacceptable. Based on the findings of the assessment the northern most part of this site was taken forward only in combination with CFS 23.</p>
CFS 22	Selected	<p>The site is located north of Armscote Road at the junction with Front Street. There is existing access to the site off Front Street via a bridleway. Access could also be taken off Armscote Road. The site is not constrained by topography. The site is well related to the existing built form along Armscote Road being adjacent to Cross Leys. The Landscape Sensitivity Assessment notes that the area just west of Cross Leys, but extending further north, has some potential for housing development. The SEA Assessment of Reasonable Alternatives notes that the site is located in close proximity to the AONB boundary. Due to the small-scale nature of this site and the conclusions of the Landscape Sensitivity Assessment the SEA summarised that there would be a negligible effect on landscape at this location. The site is reasonably well located in terms of access</p>

Reasonable Alternative	Selected / Rejected	Reason for Selection / Rejection ²³
		<p>to village amenities. The site is located adjacent to an area of high risk from surface water flooding. On site there are areas at low and medium risk of surface water flooding. The SEA concluded a minor adverse effect of development at this location on the water environment. The Steering Group concluded that the site would fit well with existing development on Cross Leys and Armscote Road and it was selected for further consideration for small scale development in the NDP.</p>
CFS 23	Selected	<p>The site is located to the rear of Nellands Close. It comprises the same site as CSF 21 with the exception that Nellands Cottage and its curtilage has been excluded from the red line area and the site includes more of the track adjacent to Nellands Cottage. As outlined in CSF 21 above the Neighbourhood Planning Working group considered that development on the southern part of this site is unacceptable. However the Working Group supported development on the remaining part in conjunction with that part of CSF 21 comprising Nellands Cottage and its curtilage. This area of the site was therefore selected for further consideration in the NDP.</p>
CFS 24	Rejected	<p>This site comprises land to the north of the paddocks and to the rear of properties fronting Armscote Road. The Landscape Sensitivity Assessment notes that the site is located within an area of high / medium sensitivity to housing development. The site is located less than 150m away from the boundary of the Cotswold AONB and forms part of the hinterland setting. The SEA Assessment of Reasonable Alternatives concludes major adverse effects on landscape due to a change in views to / from sensitive receptors. Areas of the site are classed as being of high and medium risk of surface water flooding. The SEA therefore concludes that development at this location would have a major adverse effect on the water and flooding objective. The site is not well connected to the rest of the village. Based on these reasons this site was rejected and not considered further in the development of the NDP.</p>
CFS 25	Rejected	<p>This site comprises land adjacent to Mickleton Road between Back Street and Font Street. The site is located within Ilmington Conservation Area. The SEA Assessment of Reasonable Alternatives concludes that development at this location could have minor negative impacts on the setting of the Conservation Area and Listed Buildings. The site is located within the Cotswold AONB. The Landscape Sensitivity Assessment notes that the site is located within an area of high / medium sensitivity to housing development. The SEA notes that, whilst impacts on the AONB are not anticipated due to the site's enclosed nature within the wider settlement of Ilmington, minor impacts on the local landscape character and views to / from sensitive receptors are likely. The site is located entirely within an area at low risk of surface water with large areas at medium risk and smaller areas at high risk to the west and north of the site. The SEA concluded a major negative effect of development at this location on water and flooding. The Working Group concluded that based on these reasons and that the site represents an open area of countryside within the village which makes an important contribution to the village's 'open weave' character that this option would not be taken forward for further consideration in the NDP.</p>

5 Preferred Option

5.1.1 The Pre-Submission Consultation Plan has been designed to allow Ilmington to develop through well thought out and sympathetic housing growth and development whilst contributing the District's housing target and meeting the housing needs of the community.

5.1.2 The Plan aims to achieve a balance between conserving Ilmington's valued landscapes and heritage assets whilst securing the necessary infrastructure to support development in the Parish.

5.1.3 The vision is as follows and sets a strategic context for the Ilmington NDP:

- Ilmington Parish continuing to be a desirable place to live, and thriving with a strong sense of community and a prosperous local economy;
- The village of Ilmington remaining an attractive and tranquil rural settlement set in beautiful Cotswold countryside with its special open-weave mosaic of green spaces and built area preserved.
- New developments focused around the village of Ilmington. They will reflect and / or complement the village's distinctive and historic character in terms of high-quality design by echoing the scale, layout, grain and mix of materials that contribute to that character.
- The village retaining a good mix of housing and community uses.
- The landscape setting of the Neighbourhood Area preserved and protected as well as the views into, out of and within the village.
- Development underpinned by essential improvements in basic infrastructure services including drainage and sewerage.
- The natural environment and community services valued and sustained.

5.1.4 The NDP sets out a series of 28 policies, three housing site allocations and one strategic reserve site allocation that aim to support the delivery of this vision. The allocations include the following sites (see **Figure 5.1**):

- **Housing Allocation Site 1 (1.25ha):** Land at Mabel's Farm (up to the north side footpath) for approximately 20 dwellings;
- **Housing Allocation Site 2 (0.2ha):** Land off Featherbed Lane for approximately 3 dwellings;
- **Housing Allocation Site 3 (0.33ha):** Land north of Armscote Road for approximately 3 dwellings.

- **Strategic Reserve Site 1a (0.5ha):** Land at Mabel's Farm reserved for approximately 8 dwellings. The land at this site will only be released if there is an identified shortfall in housing delivery in order to maintain a 5-year supply in Stratford-on-Avon.

5.1.5 These sites were appraised for their likely environmental impacts during the SEA appraisal of reasonable alternatives for sites (**Chapter 4**). Alongside the Working Group's site assessment process and results from the workshop event, these assessments helped inform the Neighbourhood Planning Steering Group's decision-making process on which sites to allocate for development.

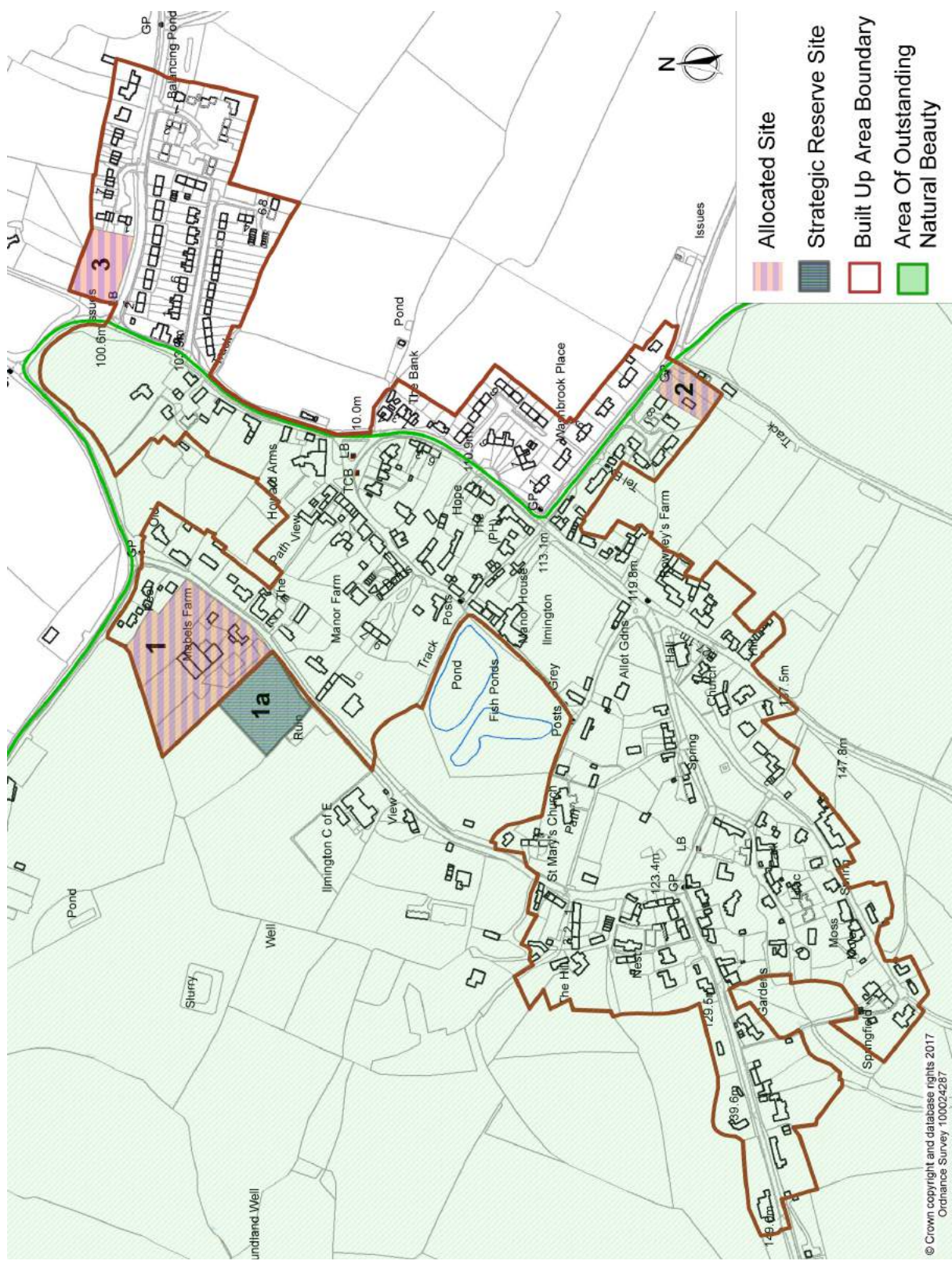


Figure 5.1: Map of site allocations proposed in the NDP (map taken from the NDP page 21, Figure 5)

6 Assessment of Effects Pre-Mitigation

6.1 Introduction

6.1.1 The 28 policies that form the Ilmington NDP have been individually assessed against each of the three SEA Objectives contained within the SEA Framework (**Appendix B**). 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. It should be noted that this assessment has been undertaken before the consideration of mitigation. Mitigation is outlined in **Chapter 7**.

6.2 Policy HG.1: Housing Allocations

Allocation	SEA1	SEA2	SEA3
	Cultural Heritage	Landscape	Water and Flooding
HG1.1	-	-	○
HG1.2	○	○	○
HG1.3	-	○	-

6.2.1 Policy HG.1 identifies three sites which are allocated for housing development (HG1.1, HG1.2 and HG1.3). An assessment of these sites pre-mitigation has been provided in the Reasonable Alternatives report²⁶ (**Appendix A**) and summarised in **Section 4**. Where appropriate, reference has been made to these assessments.

²⁶ Lepus Consulting (2018). Assessment of Reasonable Alternatives.

HG1.1: Mabel's Farm

6.2.2 HG1.1 incorporates Reasonable Alternative Sites CSF 1 to 7 and a small strip of CSF 8 in its north eastern corner but excludes CSF 4. The site is located at Mabel's Farm and comprises the existing farm buildings and surrounding greenfield land used for agricultural purposes. Approximately twenty dwellings are proposed at this location.

6.2.3 Site HG1.1 is located adjacent to and visible from the Ilmington Conservation Area. The Conservation Area Review for Ilmington describes the current farm site as an "eyesore" and notes that development at this location is unlikely to impact on the Conservation Area. Development of the surrounding greenfield land may have a setting impact on the Conservation Area and Listed Buildings within the surrounding area such as Folly Farmhouse and Mabel's Farmhouse. A minor negative impact pre-mitigation on features of cultural heritage importance are therefore likely.

6.2.4 In terms of landscape, HG1.1 is located within the Cotswold AONB. The Landscape Sensitivity Assessment notes that the site is of medium sensitivity to housing development. However, it notes that development may be appropriate "*in the two fields to the south east abutting Back Street*". As a proportion of the site is agricultural greenfield and given its location within the AONB it is likely that there will be a minor adverse impact on landscape pre-mitigation.

6.2.5 Due to the location of HG1.1 within an area of low-risk of surface water flooding it is likely that development would result in a negligible impact on the water and flooding objective.

HG1.2: Featherbed Lane

6.2.6 HG1.2 comprises the north eastern section of site CSF 21 and 23 from the Assessment of Reasonable Alternatives. The site is located off Featherbed Lane and comprises an existing dwelling known as Nellands Cottage and parts of an agricultural field to its south. Approximately three dwellings are proposed at this location.

- 6.2.7 HG1.2 is located outside Ilmington Conservation Area and is not directly adjacent to any Listed Buildings or other features of archeological interest. Given the site location and proposed scale of development it is therefore concluded that there will be a negligible impact on the cultural heritage objective as a result of development at this location.
- 6.2.8 HG1.2 is located within the Cotswold AONB. The Landscape Sensitivity Assessment notes that the site is of high / medium sensitivity to housing development. However, it notes that “*the only opportunity [for housing development] would be the small field directly south of Ballards Lane housing but the density should be low*”. Given the size and location of the site and the proposed housing density (3 dwellings) it is considered that there will be a negligible impact on the landscape objective as a result of HG1.2.
- 6.2.9 HG1.2 is located within an area at low-risk of surface water flooding and therefore, when taking into consideration the scale of the proposed development, it is considered that there would be a negligible impact on the water and flooding objective.

HG1.3: North Armscote Road

- 6.2.10 The allocation for site HG1.3 comprises CSF 22 from the Assessment of Reasonable Alternatives. A public footpath crosses the site from a south west to north east direction. Approximately three dwellings are proposed at this location.
- 6.2.11 HG1.3 is located in close proximity to Ilmington Conservation Area. It is considered that pre-mitigation development at this location may have a minor adverse setting impact on the cultural heritage objective.
- 6.2.12 HG1.3 is located in close proximity to the Cotswold AONB. The Landscape Sensitivity Assessment notes that the site is of high / medium sensitivity to housing development. However, it also states that there is “*some limited potential in the small plot on the southern edge, just west of existing dwellings, but extending no further north*”. Taking this into consideration and given the proposed scale of development at this site (3 dwellings) it is considered that development at this site would have a negligible effect on the landscape objective.

6.2.13 HG1.3 is located adjacent to an area at high-risk of surface water flooding, with areas of low and medium risk to surface water flooding. Due to the scale of proposed development, it is considered that there would be a minor negative impact on the water and flooding objective.

6.3 Policy HG.2: Strategic Reserve Site

SEA1	SEA2	SEA3
Cultural Heritage	Landscape	Water and Flooding
○	-	○

6.3.1 Policy HG.2 reserves land at Mabel’s Farm for future housing allocation for approximately 8 dwellings. This is only to be released if there is an identified shortfall in housing delivery in order to maintain a 5-year supply of housing land in Stratford-on-Avon District. The site comprises CSF 4 which was considered within the Assessment of Reasonable Alternatives. The site is located directly off Back Street and is currently greenfield land used for agricultural purposes and associated with Mabel’s Farm.

6.3.2 The site is located adjacent to the Ilmington Conservation Area and Listed Building (Mabel’s Farmhouse). It is considered that development proposed at this site pre-mitigation is likely to have a minor adverse effect on the setting of these features.

6.3.3 The site is located within the Cotswold AONB. The Landscape Sensitivity Assessment notes that the site is of medium sensitivity to housing development. The assessment states that development may be appropriate “*in the two fields to the south east abutting Back Street*”, which is likely to include HG.2. Due to the scale of development proposed at this site (8 dwellings) it is likely that views within the AONB and its character may be affected. Therefore, a minor adverse effect on landscape is concluded pre-mitigation.

6.3.4 The site is located within an area assessed as at low risk of surface water flooding. It is therefore considered that there will be a negligible impact on the water and flooding objective.

6.4 Policy HG.3: Mabel’s Farm Development

SEA1	SEA2	SEA3
Cultural Heritage	Landscape	Water and Flooding
+	+	O

6.4.1 Policy HG.3 requires that all development at Mabel’s Farm should make a positive contribution to the character of the village through the adoption of a number of design principles. These design principles are set out in Section 7 of the NDP. This will ensure that all building works undertaken are in keeping with the character of the village, the Conservation Area, the AONB and are sympathetic to its built and historic environment. This will result in positive effects for the cultural heritage and landscape objectives.

6.4.2 This policy will have a negligible impact on the water and flooding objective.

6.5 Policy HG.4: Relocation of Mabel’s Farm

SEA1	SEA2	SEA3
Cultural Heritage	Landscape	Water and Flooding
+/-	+/-	+/-

6.5.1 Policy HG.4 requires that, in accordance with Warwickshire County Council’s current policy of sustaining their tenanted small holdings, Mabel’s Farm will be relocated in the immediate local area. At the time of writing the location for the relocation of Mabel’s Farm is unknown and therefore it is not possible to assess impacts on the SEA objectives.

6.6 Policy HG.5: Sites 2 and 3

SEA1	SEA2	SEA3
Cultural Heritage	Landscape	Water and Flooding
+	+	O

6.6.1 Policy HG.5 sets out the development guidelines for Sites HG.2 and HG.3. This requires that development should be in the form of a small courtyard or extension of the road frontage in keeping with the village’s character and associated street scene. This will result in benefits for the setting of the Conservation Area and AONB resulting in positive impacts for the cultural heritage and landscape objectives.

6.6.2 This policy will have a negligible impact on the water and flooding objective.

6.7 Policy HG.6: Strategic Reserve Site

SEA1	SEA2	SEA3
Cultural Heritage	Landscape	Water and Flooding
○	○	○

6.7.1 Policy HG.6 sets out principles for the release of land at the Strategic Reserve Site in order to maintain a 5-year supply of housing land in Stratford-on-Avon. This policy is likely to have a negligible effect on the SEA objectives.

6.8 Policy DC.1: Development within the Neighbourhood Area

SEA1	SEA2	SEA3
Cultural Heritage	Landscape	Water and Flooding
+	+	○

6.8.1 Policy DC.1 sets out a number of criteria to ensure that development in the Neighbourhood Area reflects and enhances its distinctive qualities. This will ensure that development is sympathetic to the landscape character and setting of cultural heritage assets. They focus on Listed Buildings, the Conservation Area, Valued Landscapes, the AONB, remnant orchards and Local Green Spaces. This policy supports development that reflects the existing settlement pattern of the village including the quantity, mix and density of housing. Minor positive effects on the cultural heritage and landscape objectives are expected as a result of this policy.

6.8.2 This policy will have a negligible impact on the water and flooding objective.

6.9 Policy DC.2: Built Up Area Boundary

SEA1	SEA2	SEA3
Cultural Heritage	Landscape	Water and Flooding
+	+	○

6.9.1 Policy DC.2 defines the built-up area boundary for the village. The designation of this boundary will help to identify the extent of the built environment of the village and therefore protect the local landscape and setting of cultural heritage assets. Minor positive effects on the cultural heritage and landscape objectives are expected as a result of this policy.

6.9.2 This policy will have a negligible impact on the water and flooding objective.

6.10 Policy DC.3: Infill within the Built-Up Area Boundary

SEA1	SEA2	SEA3
Cultural Heritage	Landscape	Water and Flooding
+	+	○

6.10.1 Policy DC.3 sets out the provisions under which development within the built-up area boundary will be supported. These include compliance with design principles set out in Section 7 of the Plan. It requires that development contributes to the character of the village. This policy will help to safeguard the local landscape and setting of cultural heritage assets. Minor positive effects on the cultural heritage and landscape objectives are expected as a result of this policy.

6.10.2 This policy will have a negligible impact on the water and flooding objective.

6.11 Policy DC.4: Pedestrian and Access to Amenities

SEA1	SEA2	SEA3
Cultural Heritage	Landscape	Water and Flooding
○	○	○

6.11.1 Policy DC.4 sets out criteria for the design of pedestrian access to ensure that it connects safely to the village’s amenities and existing pavement network. This policy is likely to have a negligible effect on the SEA objectives.

6.12 Policy DC.5: Valued Landscapes, Vistas and Skylines

SEA1	SEA2	SEA3
Cultural Heritage	Landscape	Water and Flooding
+	+	○

6.12.1 Policy DC.5 requires development proposals to demonstrate how they are appropriate to, and integrate with, the character of the landscape setting whilst considering and enhancing the character of the landscape. This policy sets out provisions to protect valued landscapes, vistas and skylines associated with the village. This policy will help to safeguard the local landscape character and setting of cultural heritage assets. Minor positive effects on the cultural heritage and landscape objectives are expected as a result of this policy.

6.12.2 This policy will have a negligible impact on the water and flooding objective.

6.13 Policy DC.6: Environmental Sustainability

SEA1	SEA2	SEA3
Cultural Heritage	Landscape	Water and Flooding
○	○	+

6.13.1 Policy DC.6 requires that all development should be environmentally sustainable. This policy sets out a series of principles that new development should support such as water recycling, use of renewable technology for energy production, ‘eco-friendly’ homes and the promotion of energy efficiency. Through its promotion of grey water capture and recycling this policy promotes measures to reduce and mitigate climate change. This policy will therefore have a minor positive effect on the water and flooding objective.

6.13.2 This policy will have a negligible impact on the cultural heritage and landscape objectives.

6.14 Policy DC.7: Local Parking Standards and Traffic Management

SEA1	SEA2	SEA3
Cultural Heritage	Landscape	Water and Flooding
○	○	○

6.14.1 Policy DC.7 sets out standards for local parking and traffic management. This policy is likely to have a negligible effect on the SEA objectives.

6.15 Policy HA.1: Heritage and Archaeological Assets

SEA1	SEA2	SEA3
Cultural Heritage	Landscape	Water and Flooding
+	+	○

6.15.1 Policy HA.1 requires development proposals to demonstrate how they will conserve or enhance the Neighbourhood Area’s historic environment including its archaeological assets. These include the Conservation Area and Listed Buildings. The protection of these features will have a positive impact on the cultural heritage objective. In addition, due to the importance of the heritage and archaeological assets to the landscape character and setting of Ilmington this policy will also positively affect the landscape objective.

6.15.2 This policy will have a negligible impact on the water and flooding objective.

6.16 Policy LGS.1: Local Green Spaces

SEA1	SEA2	SEA3
Cultural Heritage	Landscape	Water and Flooding
+	+	○

6.16.1 Policy LGS.1 designates a number of areas as Local Green Space and protects these areas from development that would harm their openness or special character. The protection of these areas will contribute to the protection of the local landscape character and also the setting of cultural heritage assets. Minor positive effects on the cultural heritage and landscape objectives are expected as a result of this policy.

6.16.2 This policy will have a negligible impact on the water and flooding objective.

6.17 Policy INF.1: Flooding

SEA1	SEA2	SEA3
Cultural Heritage	Landscape	Water and Flooding
○	○	+

6.17.1 Policy INF.1 notes that development proposals will only be supported where they satisfactorily address the risk of fluvial and pluvial flooding. It supports the inclusion of Sustainable Urban Drainage Systems (SuDS) in new development. This policy will seek to address issues associated with surface water flooding within the village. Minor positive effects on the water and flooding objective are expected as a result of this policy.

6.17.2 This policy will have a negligible impact on the cultural heritage and landscape objectives.

6.18 Policy INF.2: Foul Water Drainage Mitigation

SEA1	SEA2	SEA3
Cultural Heritage	Landscape	Water and Flooding
○	○	+

6.18.1 Policy INF.2 requires that all new development demonstrate adequate means of foul drainage and evidence to demonstrate sufficient capacity within the system. This policy will seek to address surface water flooding issues within the village. Minor positive effects on the water and flooding objective are expected as a result of this policy.

6.18.2 This policy will have a negligible impact on the cultural heritage and landscape objective.

6.19 Policy NE.1: Biodiversity, Wildlife and Habitat Conservation and Protection

SEA1	SEA2	SEA3
Cultural Heritage	Landscape	Water and Flooding
+	+	○

6.19.1 Policy NE.1 aims to retain existing and create new ecological networks. This will have the effect of positively contributing the local landscape character and setting with positive effects on the landscape and cultural heritage objectives.

6.19.2 This policy will have a negligible impact on the water and flooding objective.

6.20 Policy NE.2: Aquatic Habitats

SEA1	SEA2	SEA3
Cultural Heritage	Landscape	Water and Flooding
+	+	+

6.20.1 Policy NE.2 aims to protect and enhance aquatic habitats within the Neighbourhood Area. This will have the effect of positively contributing the landscape quality with positive effects on the and cultural heritage objectives.

6.20.2 In addition, the protection and enhancement of aquatic features in the local area will retain local sustainable drainage features with positive effects for the water and flooding objective.

6.21 Policy NE.3: Boundary Treatments and Landscaping

SEA1	SEA2	SEA3
Cultural Heritage	Landscape	Water and Flooding
+	+	○

6.21.1 Policy NE.3 aims to ensure that boundaries and barriers are designed to reflect the traditional Parish and village style and characteristics as set out within the Plan and also, where appropriate, provide and protect ecological habitats provided by these features. This will have the effect of positively contributing to landscape quality and character with positive effects on the landscape and cultural heritage objectives.

6.21.2 This policy will have a negligible impact on the water and flooding objective.

6.22 Policy NE.4: Allotments and Orchards

SEA1	SEA2	SEA3
Cultural Heritage	Landscape	Water and Flooding
+	+	○

6.22.1 Policy NE.4 protects orchards, remnant orchards and allotments from loss to development. Their retention will have the effect of positively contributing the landscape quality and character with positive effects on the landscape and cultural heritage objectives.

6.22.2 This policy will have a negligible impact on the water and flooding objective.

6.23 Policy NE.5: Tranquillity

SEA1	SEA2	SEA3
Cultural Heritage	Landscape	Water and Flooding
+	+	○

6.23.1 Policy NE.5 seeks to ensure that new development safeguards the tranquility of the Neighbourhood Area. This will be particularly beneficial to areas within the Neighbourhood Area that are located within the Cotswold AONB which is defined as a “*tranquil area*”. This will have the effect of positively contributing the landscape quality and character with positive effects on the landscape and cultural heritage objectives.

6.23.2 This policy will have a negligible impact on the water and flooding objective.

6.24 Policy NE.6: Dark Skies

SEA1	SEA2	SEA3
Cultural Heritage	Landscape	Water and Flooding
○	+	○

6.24.1 Policy NE.6 requires development to respect Ilmington’s dark skies, demonstrate its protection and follow the Design Principles set out in the Plan for exterior lighting. This will have the effect of positively contributing the landscape quality and character with positive effects on the landscape objective.

6.24.2 This policy will have a negligible impact on the water and flooding objective.

6.25 Policy ETA.1: Encouraging Local Employment

SEA1	SEA2	SEA3
Cultural Heritage	Landscape	Water and Flooding
○	○	○

6.25.1 Policy ETA.1 promotes development that provides new or helps sustain local employment. This policy is likely to have a negligible effect on the SEA objectives.

6.26 Policy ETA.2: Home-Working and Internet Connectivity

SEA1	SEA2	SEA3
Cultural Heritage	Landscape	Water and Flooding
○	○	○

6.26.1 Policy ETA.2 encourages development which supports home-working. This policy is likely to have a negligible effect on the SEA objectives.

6.27 Policy ETA.3: Rural Tourism

SEA1	SEA2	SEA3
Cultural Heritage	Landscape	Water and Flooding
○	○	○

6.27.1 Policy ETA.3 supports development which offers new and improved leisure and tourism-based services and facilities within Ilmington. This policy is likely to have a negligible effect on the SEA objectives.

6.28 Policy ETA.4: Sustaining Local Amenities

SEA1	SEA2	SEA3
Cultural Heritage	Landscape	Water and Flooding
○	○	○

6.28.1 Policy ETA.4 promotes the retention of existing community facilities. This policy is likely to have a negligible effect on the SEA objectives.

6.29 Policy ETA.5: Safe Walking and Cycling

SEA1	SEA2	SEA3
Cultural Heritage	Landscape	Water and Flooding
○	○	○

6.29.1 Policy ETA.5 promotes development that demonstrates opportunities for walking and cycling. This policy is likely to have a negligible effect on the SEA objectives.

6.30 Summary of policy assessments scores pre-mitigation

6.30.1 The SA scoring matrices for all policies assessed in this report pre-mitigation 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 negligibly or positively impacts most SEA topics. Policies HG.1 and HG.2 allocate sites for housing development and are therefore expected to result in negative impacts against the SEA objectives when considered in the absence of mitigation measures. The implementation of mitigation measures is considered in **Chapter 7**.

Table 6.1: SEA scoring matrices for policies proposed in the NDP pre-mitigation

	SEA2	SEA3	SEA4
	Cultural Heritage	Landscape	Water and Flooding
HG1	-	-	-
HG2	○	-	○
HG3	+	+	○
HG4	+/-	+/-	+/-
HG5	+	+	○
HG6	○	○	○
DC1	+	+	○
DC2	+	+	○
DC3	+	+	○
DC4	○	○	○
DC5	+	+	○
DC6	○	○	+
DC7	○	○	○
HA1	+	+	○
LGS1	+	+	○
INF1	○	○	+
INF2	○	○	+
NE1	+	+	○
NE2	+	+	+
NE3	+	+	○
NE4	+	+	○
NE5	+	+	○
NE6	○	+	○
ETA1	○	○	○
ETA2	○	○	○
ETA3	○	○	○
ETA4	○	○	○
ETA5	○	○	○

7 Mitigation and Residual Effects

7.1 Introduction

7.1.1 Minor adverse environmental effects have been identified on the SEA objectives for Policies HG1 and HG2. Mitigation has therefore been explored for these policies through the application of the mitigation hierarchy approach (see **Section 3.10**). Following consideration of mitigation and enhancement measures, the residual effects of the proposals in the plan have been identified.

7.2 Cultural Heritage

Cumulative and Significant Impacts

7.2.1 In terms of cultural heritage pre-mitigation, minor adverse impacts have been identified for Policy HG1. This is as a result of site allocations HG1.1 (Mabel's Farm) and HG1.3 (North Armscote Road). These sites are located close to features of cultural heritage importance including Listed Buildings (Mabel's Farmhouse and Folly Farmhouse) and the Ilmington Conservation Area. These features are considered to be of high sensitivity. The NDP will not result in a direct loss of these features. It is however likely that there will be long term negative effects on the setting of these features as a result of development proposed within these housing allocations. In addition, unknown below ground archaeological features have the potential to be disturbed during the development of these allocated sites. This would result in irreversible negative effects on unknown features of cultural heritage importance. Key cumulative and significant impacts of Policy HG1 include the following:

- Change to the setting of Ilmington Conservation Area;
- Change to the setting of Listed Buildings (Mabel's Farmhouse and Folly Farmhouse); and
- Disturbance of below ground unknown features of archaeological importance.

7.2.2 With the exception of Policy HG.4 (Relocation of Mabel’s Farm) where impacts have been assessed as uncertain, all other policies within the plan were assessed as having negligible or minor positive effects on the cultural heritage objective.

Mitigating impact of the NDP policies

7.2.3 Adverse impacts on cultural heritage caused by development proposed in Policy HG.1 will be mitigated to some extent by various other proposals within the Plan. These mitigating policies are set out in **Table 7.1**.

Table 7.1: Cultural heritage mitigation within the NDP

NDP Policy	Mitigating Effect
<p>HG3: Mabel’s Farm Development</p> <p>“Development of Mabel’s Farm should make a positive contribution to the character of the village. In addition to the Design Principles in Section 7 [of the NDP] and the other policies within this Plan the development should also:</p>	<p>Setting of heritage assets (Ilmington Conservation Area and Listed Buildings): This policy and the Design Principles in Section 7 of the NDP will help to ensure that the setting of these historic assets is protected.</p>
<p>Policy HG.5: Sites 2 and 3</p> <p>“Development should be in the form of a small courtyard or an extension of the road frontage in keeping with the village’s character and associated street scene”.</p>	<p>Setting of heritage assets (Ilmington Conservation Area and Listed Buildings): This policy of the NDP will help to ensure that the setting of these historic assets is protected.</p>
<p>Policy DC.1: Development within the Neighbourhood Area</p> <p>“Development within the Neighbourhood Area will be supported in principle if it complies with the other policies in this Plan and;</p> <ul style="list-style-type: none"> - Conserves the rural character of the Neighbourhood Area and in particular the village. - Complies with the Design Principles set out in Section 7 [of the NDP]. - Protects the landscape setting of the village by protecting the surrounding countryside from unsympathetic development. - Respects and contributes to the character of the village and preserves or enhances: <ol style="list-style-type: none"> a. Listed buildings and their settings; b. The Ilmington Conservation Area and its setting; c. Valued Landscapes 	<p>Setting of heritage assets (Ilmington Conservation Area and Listed Buildings): This policy of the NDP will help to ensure that the setting of these historic assets is protected.</p>

NDP Policy	Mitigating Effect
<p>Policy HA.1: Heritage and Archaeological Assets</p> <p>“Where required by the planning, authority, development proposals should demonstrate how they will conserve or enhance the Neighbourhood Area’s historic environment including archaeological assets. The impact of any development on any heritage asset will be judged against the degree of harm and the significance of the heritage asset affected and weighed against any public benefits”.</p>	<p>Setting of heritage assets (Ilmington Conservation Area and Listed Buildings): This policy of the NDP will help to ensure that the setting of these historic assets is protected.</p> <p>Disturbance of below ground features of archaeological interest: This policy of the NDP will help to ensure that archaeological features are conserved and enhanced.</p>
<p>Policy DC.2: Built-Up Area Boundary Policy DC.3: Infill within the Built-Up Area Boundary Policy LGS.1: Local Green Space</p>	<p>Setting of heritage assets (Ilmington Conservation Area and Listed Buildings): These policies aim to preserve the existing character of the village maintaining and protecting green space. This will ensure that the setting of the heritage assets is preserved.</p>
<p>Policy DC.5: Valued Landscapes, Vistas and Skylines</p> <p>“Development proposals must demonstrate how they are appropriate to, and integrate with, the character of the landscape setting whilst conserving, and where appropriate, enhancing the character of the landscape.</p> <p>Development proposals should ensure that all valued landscapes, as shown in Figure 12 [of the NDP], and important vistas and skylines are maintained and safeguarded, particularly where they relate to heritage assets, rising land, village approaches and settlement boundaries”.</p>	<p>Setting of heritage assets (Ilmington Conservation Area and Listed Buildings): This policy of the NDP will help to ensure that the setting of these historic assets is protected.</p>
<p>Policy NE.1: Biodiversity, Wildlife and Conservation and Protection Policy NE.2: Aquatic Habitats Policy NE.3: Boundary Treatments and Landscaping Policy NE. 4: Allotments and Orchards Policy NE.5: Tranquillity</p>	<p>Setting of heritage assets (Ilmington Conservation Area and Listed Buildings): Policies NE1 to NE5 set out requirements to protect ecological habitats and networks, selecting sensitive boundary treatments and landscaping, retaining orchards and allotments and preserving the tranquillity of the village. Each of these policies will protect and enhance the existing character of the village resulting in positive effects on features of cultural heritage importance in terms of their setting.</p>

Residual effects

7.2.4 Following the implementation of mitigation set out in the policies of the NDP it can be concluded that the Plan will have a long term negligible / minor positive effect on features of cultural heritage importance.

7.3 Landscape

Cumulative and Significant Impacts

7.3.1 All sites allocated for development under policies HG.1 and HG.2 are located within or adjacent to the Cotswold AONB and within areas of high / medium landscape sensitivity to housing development. In addition, the sites are also visible by residents and users of the PRoW network in the area. The local rural character of the village is an important feature of Ilmington. In terms of landscape, pre-mitigation minor adverse impacts have been identified for Policies HG1 (in terms of allocation HG1.1) and HG2 due to their location within the AONB and the scale of development proposed at each site. Key cumulative and significant impacts of Policy HG1 and HG2 include the following:

- Change to the setting of AONB;
- Change to the landscape character of Ilmington; and
- Impact on views.

7.3.2 With the exception of Policy HG.4 (Relocation of Mabel’s Farm) where impacts are uncertain, all other policies within the plan were assessed as having negligible or minor positive effects on the landscape objective.

Mitigating impact of the NDP policies

7.3.3 Adverse impacts on landscape caused by development proposed in the Plan will be mitigated to some extent by various other proposals within the Plan. These mitigating policies are set out in **Table 7.2**.

Table 7.2: *Landscape mitigation within the NDP*

NDP Policy	Mitigating Effect
<p>HG.3: Mabel’s Farm Development “Development of Mabel’s Farm should make a positive contribution to the character of the village. In addition to the Design Principles in Section 7 [of the NDP] and the other policies within this Plan the development should also:</p> <p>HG.6: Strategic Reserve Site “..... Housing on this site will need to comply with the Mabel’s Farm site-specific design principles (see Policy HG.3)”.</p>	<p>Landscape features (AONB, Valued Landscapes and local landscape character): These policies and the Design Principles in Section 7 of the NDP will help to ensure that the local landscape character and the character of the AONB are protected.</p> <p>Impact on views: These policies will safeguard key views from and towards Ilmington sensitive receptors (such as PRoWs users, residents and users of the AONB).</p>

NDP Policy	Mitigating Effect
<p>Policy DC.1: Development within the Neighbourhood Area</p> <p>“Development within the Neighbourhood Area will be supported in principle if it complies with the other policies in this Plan and;</p> <ul style="list-style-type: none"> - Conserves the rural character of the Neighbourhood Area and in particular the village. - Complies with the Design Principles set out in Section 7 [of the NDP]. - Protects the landscape setting of the village by protecting the surrounding countryside from unsympathetic development. - Respects and contributes to the character of the village and preserves or enhances: <ul style="list-style-type: none"> Valued Landscapes; The Cotswold AONB; Remnant orchards; Local Green Spaces, hedges and significant trees; The balance between open green spaces and the built area; The open weave character as described in Section 7 [of the NDP] and defined by the mix of open green spaces, footpaths and built area”. 	<p>Landscape features (AONB, Valued Landscapes and local landscape character): This policy and the Design Principles in Section 7 of the NDP will help to ensure that the setting of local landscape character and the character of the AONB are protected.</p> <p>Impact on views: This policy will safeguard key views from and towards Ilmington from sensitive receptors (such as PROWs users, residents and users of the AONB).</p>
<p>Policy DC.2: Built-Up Area Boundary Policy DC.3: Infill within the Built-Up Area Boundary Policy LGS.1: Local Green Space</p>	<p>Landscape features (AONB, Valued Landscapes and local landscape character): These policies and the Design Principles in Section 7 of the NDP will help to ensure that the local landscape character and the character of the AONB are protected.</p> <p>Impact on views: These policies will safeguard key views from and towards Ilmington from sensitive receptors (such as PROWs users, residents and users of the AONB).</p>
<p>Policy DC.5: Valued Landscapes, Vistas and Skylines</p> <p>“Development proposals must demonstrate how they are appropriate to, and integrate with, the character of the landscape setting whilst conserving, and where appropriate, enhancing the character of the landscape.</p> <p>Development proposals should ensure that all valued landscapes, as shown in Figure 12 [of the NDP], and important vistas and skylines are maintained and safeguarded, particularly where</p>	<p>Landscape features (AONB, Valued Landscapes and local landscape character): These policies and the Design Principles in Section 7 of the NDP will help to ensure that the local landscape character and the character of the AONB are protected.</p> <p>Impact on views: This policy will safeguard key views from and towards Ilmington from sensitive receptors (such as PROWs users, residents and users of the AONB).</p>

NDP Policy	Mitigating Effect
they relate to heritage assets, rising land, village approaches and settlement boundaries”.	
<p>Policy NE.1: Biodiversity, Wildlife and Conservation and Protection</p> <p>Policy NE.2: Aquatic Habitats</p> <p>Policy NE.3: Boundary Treatments and Landscaping</p> <p>Policy NE. 4: Allotments and Orchards</p> <p>Policy NE.5: Tranquillity</p> <p>Policy NE.6: Dark Skies</p>	<p>Landscape features (AONB, Valued Landscapes and local landscape character): These policies and the Design Principles in Section 7 of the NDP will help to ensure that the local landscape character and the characters of the AONB are protected.</p> <p>Impact on views: This policy will safeguard key views from and towards Ilmington from sensitive receptors (such as PRow users, residents and users of the AONB).</p>

Residual effects

7.3.4 Following the implementation of mitigation set out in the policies of the NDP it can be concluded that Plan will have a long term negligible / minor positive effect on landscape within Ilmington.

7.4 Water and Flooding

Cumulative and Significant Impacts

7.4.1 Site allocation HG1.3 (of Policy HG.1) is located adjacent to an area at high-risk of surface water flooding. It is also located within areas classed as being at low and medium risk to surface water flooding. Due to the scale of proposed development, it is considered that there would be a minor negative impact on the water and flooding objective from Policy HG.1.

7.4.2 Key cumulative and significant impacts of Policy HG1 include the following:

- Minor negative effect associated with increased risk of surface water (pluvial) flooding as a result of proposed allocation HG1.3.

7.4.3 With the exception of Policy HG.4 (Relocation of Mabel's Farm) where impacts are uncertain, all other policies within the plan were assessed as having negligible or minor positive effects on the water and flooding objective.

Mitigating impact of the NDP policies

7.4.4 Adverse impacts on water and flooding caused by development proposed in the Plan will be mitigated to some extent by various other proposals within the Plan. These mitigating policies are set out in **Table 7.3**.

Table 7.3: *Water and flooding mitigation within the NDP.*

NDP Policy	Mitigating Effect
<p>Policy INF.1 Flooding</p> <p>“Pluvial (surface water from rainfall) and Fluvial (from rivers) Flood Risk.</p> <ul style="list-style-type: none"> a. Proposals will only be supported if they satisfactorily address the risk of fluvial and pluvial flooding. b. Appropriate Sustainable Drainage System (SuDS) should be incorporated into all new developments and designed to control run-off generated on-site to the greenfield run-off rate for all return periods up to and including the 1 in 100 years plus climate change critical storm event criteria. c. Infiltration and above ground SuDS attenuation, such as swales, ponds and other water-based ecological systems, should be used whenever feasible and is preferred to underground storage of water. d. Where mitigation measures involve cut off ditches, balancing ponds and or similar, proposals should demonstrate the means by which these shall be maintained to ensure their satisfactory performance in perpetuity”. 	<p>Increase of pluvial flood risk: This policy will ensure that development adequately considers pluvial flood risk incorporating features such as SuDS.</p>
<p>Policy INF.2 Foul Water Drainage Mitigation</p> <p>“All new development must demonstrate adequate means of foul drainage and evidence submitted to demonstrate sufficient capacity exists within the system to drain and process sewage during and subsequent to episodes of heavy rainfall”.</p>	<p>Increase of pluvial flood risk: This policy will ensure that development adequately considers pluvial flood risk by ensuring capacity exists in the foul drainage system during and subsequent to episodes of heavy rainfall.</p>
<p>Policy DC.6: Environmental Sustainability</p> <p>“All development should be designed to be environmentally sustainable. This includes:</p> <ul style="list-style-type: none"> - Plans that include the recycling of grey water and captured rainwater will be supported”. 	<p>Increase of pluvial flood risk: This policy will ensure that development adequately promotes sustainable use of rainwater and methods to recycle it.</p>

Residual effects

7.4.5 Following the implementation of mitigation set out in the policies of the NDP it can be concluded that Plan will have a long term negligible / minor positive effect on water and flooding within Ilmington.

7.5 Summary of post mitigation effects

7.5.1 Assessment of the NDP following consideration of mitigation proposed within the Plan did not identify any negative residual (or post mitigation) effects on the cultural heritage, landscape or water and flooding SEA objectives. All residual effects were considered to be negligible or positive.

7.5.2 One uncertain effect was identified. This was associated with Policy HG.4 – Relocation of Mabel’s Farm. At the time of writing the alternative location for its relocation was unknown and therefore it was not possible to assess the effects of this policy.

7.5.3 **Table 7.4** below provides a summary of anticipated likely effects of the NDP following the implementation of mitigation and enhancement measures.

Table 7.4: SEA scoring matrices for policies proposed in the NDP post mitigation and enhancement

	SEA Objective 2	SEA Objective 3	SEA Objective 4
	Cultural Heritage	Landscape	Water and Flooding
HG1	○	○	○
HG2	○	○	○
HG3	+	+	○
HG4	+/-	+/-	+/-
HG5	+	+	○
HG6	○	○	○
DC1	+	+	○
DC2	+	+	○
DC3	+	+	○
DC4	○	○	○
DC5	+	+	○
DC6	○	○	+
DC7	○	○	○
HA1	+	+	○
LGS1	+	+	○
INF1	○	○	+
INF2	○	○	+
NE1	+	+	○
NE2	+	+	+
NE3	+	+	○
NE4	+	+	○
NE5	+	+	○
NE6	○	+	○
ETA1	○	○	○
ETA2	○	○	○
ETA3	○	○	○
ETA4	○	○	○
ETA5	○	○	○

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 ER should also provide information on a ‘*description of the measures envisaged concerning monitoring*’ (Annex I (i)). This represents Stage F of the process, 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 NDP 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 are required to prepare Annual Monitoring Reports for their Development Plan²⁷. It is anticipated that elements of the SEA monitoring programme for the NDP could be incorporated into these processes. The monitoring targets will be informed by the SA Framework and its indicators (see **Appendix B**) and Stratford-on-Avon's existing Core Strategy Monitoring Framework.

8.1.7 Whilst the SEA process has not identified any significant negative effects associated with the NDP it is considered that monitoring may be beneficial to ensure the successful implementation of recommended mitigation and enhancement measures set out within its policies. The areas specified for monitoring therefore include the following:

- Assessment of planning applications that affect designated historic assets.
- Assessment of planning applications that involve the loss of a non-designated historic features.
- Production of Conservation Area Appraisals and Management Plans.
- Schemes providing public access to or interpretation of an historic asset.
- Assessment of development proposals incorporating landscaping schemes to mitigate the impact of development or provide enhancement, focusing on areas of landscape sensitivity on the edges of settlements.
- Assessment of the justification for granting planning permissions for large-scale development proposals within or close to the AONB.
- Number of planning applications incorporating SuDS.
- Number of planning applications granted contrary to Environment Agency advice.

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.

²⁷ Stratford-on-Avon Monitoring Reports available at: <https://www.stratford.gov.uk/planning-regeneration/monitoring-information.cfm>

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 Assessment of policies within the NDP identified negligible and positive residual effects on the SEA objectives. One uncertain effect was identified. This was associated with Policy HG.4 – Relocation of Mabel’s Farm. At the time of writing the alternative location for its relocation was unknown and therefore it was not possible to assess the effects of this policy.

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 Plan 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, then 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. When the responses have been received these will be sent, together with The Neighbourhood Plan, to an independent examiner who will test whether or not the plan meets the basic conditions²⁸.
- 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 E 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.

²⁸ Town and Country Planning Act 1990. Available at:
<https://www.legislation.gov.uk/ukpga/1990/8/contents>.

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- To meet these requirements, following any further changes before adoption, a Post Adoption Statement will be published with the adopted version of the NDP.

9.3 Commenting on the Environmental Report

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

Appendix A: Reasonable Alternatives Report

Strategic Environmental Assessment of the Ilmington Neighbourhood Development Plan

Assessment of Reasonable Alternatives

LC-441	Document Control Box
Client	Stratford-on-Avon District Council
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Author	CW
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Approved	ND

About this report & notes for readers

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The conclusions below are based on the best available information, including 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.

This report was prepared between October 2018 and January 2019 and is subject to and limited by the information available during this time.

This report has been prepared with reasonable skill, care and diligence within the terms of the contract with the client. Lepus Consulting accepts no responsibility to the client and third parties of any matters outside the scope of this report. Third parties to whom this report or any part thereof is made known rely upon the report at their own risk.

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Contents

1	Introduction	1
1.1	This report	1
1.2	The Ilmington Neighbourhood Development Plan	2
1.3	Best Practice SEA Guidance	3
2	Methodology	4
2.1	Screening	4
2.2	Scoping stage	4
2.3	Assessment of Reasonable Alternatives	5
2.4	Significance	8
2.5	Impact sensitivity	8
2.6	Impact magnitude	9
2.7	Predicting effects	10
2.8	Distances	10
2.9	Facilitating iteration in the SEA process	11
2.10	Assessment assumptions	11
2.11	Limitations	13
2.12	Pre-mitigation assessment	14
3	Assessment of Reasonable Alternatives	15
3.1	Reasonable Alternatives	15
3.2	Site Assessments	16
3.3	Sites CFS 1 to 8 - Mabel's Farm	18
3.4	Sites CFS 9 to 12 - Land east of Keyte Road	26
3.5	CFS 13 - Land north of Front Street	30
3.6	CFS 14 - Land south of Bennetts Place and east of Font Street	31
3.7	CFS 15 - Land adjacent to School, Back Street	32
3.8	CFS 16 - Land adjoining the Cottage, Ballard's Lane	33
3.9	CFS 17 - Land to the rear of Elm Close	34
3.10	CFS 18 - 'Swinstry Field', south of Featherbed Lane	35
3.11	CFS 19 - Middle Meadow Orchard, Front Street	36
3.12	CFS 20 - Land north of Armscote Road	37
3.13	CFS 21 - Land adjacent to Nellands Close	38
3.14	CFS 22 - Land north of Armscote Road, at junction with Front Street	39
3.15	CFS 23 - Land to the rear of Nellands Close	40
3.16	CFS 24 - Land to the north of Paddocks, Armscote Road	41
3.17	CFS 25 - Land adjacent to Mickleton Road, between Back Street and Front Street	42
3.18	Overview of assessment results	43
3.19	Cultural heritage	44
3.20	Landscape	44
3.21	Water and flooding	44
3.22	Further studies	44
4	Mitigation considerations	46

5 Conclusion	50
5.2 Next steps.....	50
Appendix A: Full SEA Framework	51

Tables

Table 2.1: Guide to scoring significant effects.....	7
Table 2.2: Geographic scales of receptors	9
Table 2.3: Impact magnitude.....	9
Table 2.4: Assumptions for each SEA objective.....	12
Table 3.1: SEA scores for the reasonable alternative sites assessed in this report.....	43

Acronyms

AONB	Area of Outstanding Natural Beauty
CA	Conservation Area
CFS	Call for Sites
DEFRA	Department for Environment, Food and Rural Affairs
EA	Environment Agency
LCA	Landscape Character Assessment
MHCLG	Ministry for Housing, Communities and Local Government
NDP	Neighbourhood Development Plan
NPPF	National Planning Policy Framework
ODPM	Office of the Deputy Prime Minister
PPP	Plan, Policy and Programme
PPG	Planning Policy Guidance
PRoW	Public Right of Way
RPG	Registered Park and Garden
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SM	Scheduled Monument
SPZ	Source Protection Zone

Summary

- E1 Lepus Consulting has prepared this Strategic Environmental Assessment (SEA) report of the Ilmington Neighbourhood Development Plan (NDP) on behalf of Stratford-on-Avon District Council. This report should be read in conjunction with the Ilmington NDP SEA Scoping Report.
- E2 The report has assessed 25 sites in and around Ilmington. The reasonable alternatives were identified by the NDP group through a call for sites exercise.
- E3 This report has identified positive and negative sustainability impacts associated with the reasonable alternatives. There is no single best performing site that will deliver all of the planned development for the plan.
- E4 The purpose of this report is to facilitate iteration in the SEA process. Reasonable alternative development options have been identified by the NDP Group and assessed by Lepus. The findings enclosed in this report are now to be presented to NDP Group decision makers so that they may choose the preferred development option that best suits the NDP. This preferred option will be used to inform the basis of new development in their draft plan. At the same time, they must decide which reasonable alternatives to reject. Once this process is complete, the NDP team can draft their NDP plan and submit the plan for assessment through the SEA process.
- E5 The next stages of the SEA process are for the NDP Group to select which reasonable alternatives should be included in the plan, and to confirm which sites are going to be rejected and why.

1 Introduction

1.1 This report

1.1.1 Lepus Consulting has been appointed by Stratford-on-Avon District Council to undertake a Strategic Environmental Assessment (SEA) of the Ilmington Neighbourhood Development Plan (NDP) 2011-2031 Pre-Submission Consultation Version¹.

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

1.1.3 The purpose of this document is to provide an appraisal of the reasonable alternatives for site allocations considered by Ilmington NDP during their plan-making process, in line with Article 5 Paragraph 1 of Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment² (SEA Directive):

“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”.

¹ Ilmington Neighbourhood Plan Steering Group (2018) Ilmington Neighbourhood Plan 2011-2031. Available at: http://www.ilmington.org.uk/parish_council/neighbourhood_plan5.html [Date Accessed: 12/09/18]

² EU Council (2001) Directive 2001/42/EC of the European Parliament and of the Council. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN> [Date Accessed: 12/09/18]

1.1.4 Sites included in this assessment of reasonable alternatives were provided by the NDP group in the 'Ilmington Neighbourhood Plan Working Group Report on Call for Sites Exercise³'. This report provides basic site information on the size of site, ownership and headline environmental features.

1.2 The Ilmington Neighbourhood Development Plan

1.2.1 The Ilmington Neighbourhood Development Plan has been developed on behalf of Ilmington Parish Council by community volunteers within the Neighbourhood Plan Steering Group. Evidence gathering and analysis, including public meetings, consultation workshops and planning assessments started in 2015.

1.2.2 Once adopted, the NDP will be a land-use plan, prepared for town and country planning purposes. It sets out a framework for future development consents within the Ilmington Parish. Once adopted, the NDP will form part of the Development Plan for the area, alongside the Core Strategy. This important legal position means that it has regard to national planning policy and to be in 'general conformity' with the strategic planning policies set out in the Stratford-on-Avon District Core Strategy 2011-2031.

1.2.3 The Stratford-on-Avon District Core Strategy 2011 – 2031 states that the 10 villages such as Ilmington (known as Category 3 Local Service Villages) should accommodate approximately 450 new houses of which no more than around 13% should be provided in any individual settlement. To date, within the Parish of Ilmington, 26 have been built or have planning permission.

³ Ilmington Neighbourhood Plan Working Group (2018) Ilmington Neighbourhood Plan Working Group Report on Call for Sites Exercise.

1.3 Best Practice SEA Guidance

1.3.1 A range of documents have been utilised in preparing the SEA of the Ilmington NDP. These are presented in **Box 1.2** below.

Box 1.2: Best Practice Guidance for SA/SEA

Lepus follows national guidance and best practice standards set out for SEA which includes:

- European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment⁴.
- Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive⁵.
- Ministry of Housing, Communities and Local Government (2018) National Planning Policy Framework (NPPF)⁶.
- Ministry of Housing, Communities and Local Government (2018) Planning Practice Guidance (PPG)⁷.
- Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans⁸.

⁴ Available at: <http://ec.europa.eu/environment/eia/sea-legalcontext.htm> [Date Accessed: 10/09/18]

⁵ Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf [Date Accessed: 10/09/18]

⁶ MHCLG (2016) Planning practice guidance. Available at: <http://planningguidance.communities.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/> [Date Accessed: 10/09/18]

⁷ MHCLG (2018) Planning Practice Guidance. Available at: <https://www.gov.uk/government/collections/planning-practice-guidance> [Date Accessed: 10/09/18]

⁸ RTPI (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans, January 2018. Available at: <http://www.rtpi.org.uk/media/2668152/sea-sappracticeadvicefull2018c.pdf> [Date Accessed: 10/09/18]

2 Methodology

2.1 Screening

2.1.1 Screening was the first phase of the SEA process. It was prepared by Lepus Consulting between April and July 2018. It determined that the Ilmington NDP should be screened into the SEA process on the grounds of likely significant effects for landscape and cultural heritage. Following comments from the Environment Agency which highlighted the issue of surface water flooding in the Parish, the issue of water and flooding has also been explored as part of the SEA process.

2.2 Scoping stage

2.2.1 Following screening, the second stage of the SEA process was the scoping stage. The Ilmington NDP Scoping Report was prepared by Lepus Consulting in August 2018⁹. This represented Stage B of SEA, according to the MHCLG (2018) Guidance on Neighbourhood Planning¹⁰. 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.

2.2.2 In considering the scope and level of detail of the information that must be included in the SEA process, and importantly the environmental report, the Scoping Report identified cultural heritage, landscape and water and flooding. All other topics in Annex 1(f) of the SEA Directive were scoped out of further consideration in the assessment process.

⁹ Lepus Consulting (2018) Strategic Environmental Assessment of the Ilmington Neighbourhood Development Plan: Scoping Report.

¹⁰ MHCLG (2018) Guidance: Strategic environmental assessment and sustainability appraisal. Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#strategic-environmental-assessment-requirements-for-neighbourhood-plans> [Date Accessed: 16/10/18]

2.3 Assessment of Reasonable Alternatives

- 2.3.1 The assessment 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 site. Assessments have been undertaken using this empirical evidence and, to a lesser extent, expert judgement. The precautionary principle¹¹ is applied to all assessments.
- 2.3.2 When evaluating significance of effect, the SEA draws on criteria in Annex II of the SEA Directive (see **Box 2.1**) and identifies a significance value using the guide in Table 2.1.

¹¹ Judgment of 7 September 2004 in case C-127/02 (Waddenzee, paragraph 45).

Box 2.1: Annex II of the SEA Directive¹²

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.

¹² EU Council (2001) Directive 2001/42/EC of the European Parliament and of the Council. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN> [Date Accessed: 11/09/18]

Table 2.1: Guide to scoring significant effects

Significance	Definition (not necessarily exhaustive)
Major Negative --	The size, nature and location of a reasonable alternative would be likely to: <ul style="list-style-type: none"> • Permanently degrade, diminish or destroy the integrity of a quality receptor, such as a feature of international, national or regional importance; • Cause a very high-quality receptor to be permanently diminished; • Be unable to be entirely mitigated; • Be discordant with the existing setting; and/or • Contribute to a cumulative significant effect.
Minor Negative -	The size, nature and location of a reasonable alternative would be likely to: <ul style="list-style-type: none"> • Not quite fit into the existing location or with existing receptor qualities; and/or • Affect undesignated yet recognised local receptors.
Negligible 0	Either no impacts are anticipated, or any impacts are anticipated to be negligible.
Uncertain +/-	It is entirely uncertain whether impacts would be positive or adverse.
Minor Positive +	The size, nature and location of a reasonable alternative would be likely to: <ul style="list-style-type: none"> • Improve undesignated yet recognised receptor qualities at the local scale; • Fit into, or with, the existing location and existing receptor qualities; and/or • Enable the restoration of valued characteristic features.
Major Positive ++	The size, nature and location of a reasonable alternative would be likely to: <ul style="list-style-type: none"> • Enhance and redefine the location in a positive manner, making a contribution at a national or international scale; • Restore valued receptors which were degraded through previous uses; and/or • Improve one or more key elements/features/characteristics of a receptor with recognised quality such as a specific international, national or regional designation.

2.3.3

A single value from **Table 2.1** is allocated to each SEA Objective for each site. Justification for the score is presented in an accompanying narrative assessment text. The assessment of a significant effect is in accordance with the footnote of Annex 1(f) of the SEA Directive, where feasible, which states:

“These effects should include secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects”.

2.3.4 When selecting a single value to best represent the environmental performance of the relevant SEA Objective, the precautionary principle is used. This is a worst-case scenario approach. If a positive effect is identified in relation to one criterion within the SEA Framework (see the second column of the SEA Framework in Appendix A) and a negative effect is identified in relation to another criterion within the same SEA Objective, the overall score will be negative for that objective.

2.3.5 The assessment considers, on a strategic basis, the degree to which a location can accommodate change without detrimental effects on known receptors (identified in the baseline).

2.4 Significance

2.4.1 Where an environmental impact has been identified, the significance of effect has been categorised as minor or major. **Table 2.1** lists the significance matrix and explains the terms used. The nature of the significant effect can be either beneficial or adverse depending on the type of development and the design and mitigation measures proposed.

2.4.2 Each site that has been assessed as a reasonable alternative in this report is awarded a score for each SEA Objective in the Framework, as per **Table 2.1**. Scores are not intended to be summed.

2.4.3 It is important to note that the scores are high level indicators. The narrative assessment text which details the key decision-making criteria behind each awarded score should always read alongside the score. Assumptions and limitations in **Table 2.4** and **section 2.11** offer further insight into how each score was arrived at.

2.4.4 Significance of effect is a combination of impact sensitivity and magnitude.

2.5 Impact sensitivity

2.5.1 Impact sensitivity is measured through consideration as to how the receiving environment will be impacted by a plan proposal. This includes assessment of the value and vulnerability of the area, whether or not environmental quality standards will be exceeded, and if impacts will affect designated areas or landscapes.

2.5.2 A guide to the range of scales used in the impact significance matrix is presented in **Table 2.2**. For most receptors, sensitivity increases with geographic scale.

Table 2.2: Geographic scales of receptors

Scale	Typical criteria
International/national	Designations that have an international aspect or consideration of transboundary effects beyond national boundaries. This applies to effects and designations/receptors that have a national or international dimension.
Regional	This includes the regional and sub-regional scale, including county-wide level and regional areas.
Local	This is the district and neighbourhood scale.

2.6 Impact magnitude

2.6.1 Impact magnitude relates to the degree of change the receptor will experience, including the probability, duration, frequency and reversibility of the impact. Impact magnitude is determined based on the susceptibility of a receptor to the type of change that will arise, as well as the value of the affected receptor (see **Table 2.3**).

Table 2.3: Impact magnitude

Impact magnitude	Typical criteria
High	Likely total loss of or major alteration to the receptor in question; <ul style="list-style-type: none"> • Provision of a new receptor/feature; or • The impact is permanent and frequent.
Medium	Partial loss/alteration/improvement to one or more key features; or The impact is one of the following: <ul style="list-style-type: none"> • Frequent and short-term; • Frequent and reversible; • Long-term (and frequent) and reversible; • Long-term and occasional; or • Permanent and occasional.
Low	Minor loss/alteration/improvement to one or more key features of the receptor; or The impact is one of the following: <ul style="list-style-type: none"> • Reversible and short-term; • Reversible and occasional; or • Short-term and occasional.

2.7 Predicting effects

2.7.1 SEA is a tool for predicting potential significant effects. Predicting effects relies on an evidence-based approach and incorporates professional judgement. It is often not possible to state with absolute certainty whether effects will occur, as many impacts are influenced by a range of factors such as the design and the success of mitigation measures.

2.7.2 The assessments in this report are based on the best available information, including that provided to us by the District and Parish Council's and information that is publicly available. Every attempt has been made to predict effects as accurately as possible.

2.7.3 SEA operates at a strategic level which uses available secondary data for the relevant SEA Objective. All reasonable alternatives are assessed in the same way using the same method. Sometimes, in the absence of more detailed information, forecasting the potential impacts of development can require making reasonable assumptions based on the best available data and trends. However, all reasonable alternatives must be assessed in the same way and any introduction of site-based detail should be made clear in the SEA report as the new data could potentially introduce bias and skew the findings of the assessment process.

2.8 Distances

2.8.1 Where distances have been measured, these are 'as the crow flies' from the furthest edge of the site unless specified otherwise. New residents require access to a range of facilities and amenities. Some distances that are considered to be sustainable in this regard are based on the Barton, Grant and Guise (2010) Shaping Neighbourhoods for Local Health and Global Sustainability¹³.

¹³ Barton, H., Grant, M. & Guise, R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

2.9 Facilitating iteration in the SEA process

2.9.1 The Reasonable Alternatives Report is produced as part of an iterative process that goes through several draft stages that are informed by discussions with and clarifications from the client team. As a result, a number of assumptions were confirmed and are presented in **Table 2.4**.

2.10 Assessment assumptions

2.10.1 Assumptions have been used to help incorporate proportionality to the SEA of reasonable alternatives.

2.10.2 In terms of published policy guidance, it is assumed that the following policies will apply to the NDP area and surrounding environments, and have been borne in mind when completing the assessment of reasonable alternatives:

- Adopted Stratford-on-Avon District Core Strategy 2011-2031 policies;
- The Cotswolds AONB Management Plan and associated Position Statements;
- NPPF (2018) planning policies; and
- PPG policies.

2.10.3 Other assumptions have been applied to the report based on discussions with the plan makers and the client team. These are presented in **Table 2.4**.

Table 2.4: Assumptions for each SEA objective.

SEA Objective	Assessment Assumptions
Cultural Heritage	<ul style="list-style-type: none"> • Several of the sites are greenfield land and it is considered to be likely that development at these locations could alter the contribution that views make towards the appreciation of a given heritage asset. • If a site is in close proximity to a heritage asset, development at that location has the potential to alter the character or setting of the asset, even if the site is not visible from the heritage asset. Impacts on the setting or character of heritage assets will be largely determined by the specific layout and design of development proposals. • The NDP Group has prepared a detailed design guide to help inform all future development in the village. This has been used to inform assessment. It is assumed that this guide will be adopted in the NDP.
Landscape	<ul style="list-style-type: none"> • Reasonable alternative sites have been assessed in terms of the extent to which they may impact on the character of local landscapes and townscapes as well as the extent to which they may alter views. • Baseline data on the landscape character has been derived from the Cotswolds AONB Landscape Character Assessment¹⁴. The land within the AONB at Ilmington is within the 'Meon and Ebrington Hills' Escarpment Outlier Character Area. • Baseline data on landscape sensitivity has been derived from the Landscape Sensitivity Assessment of Local Service Villages¹⁵. There are three levels of landscape sensitivity to housing development in and around Ilmington; medium, high/medium and high sensitivity. • The NDP Group has prepared a detailed design guide to help inform all future development in the village. This has been used to inform assessment. It is assumed that this guide will be adopted in the NDP. • It is assumed that the larger the reasonable alternative site is, the greater the likelihood that major negative impacts may arise in relation to the Cotswolds AONB and the local landscape.

¹⁴ Cotswolds AONB Partnership (2002) Cotswolds AONB Landscape Character Assessment. Available at: <https://www.cotswoldsaonb.org.uk/our-landscape/landscape-character-assessment/> [Date Accessed: 19/09/18]

¹⁵ White Consultants (2012) Landscape Sensitivity Assessment of Local Service Villages. Available at: <https://www.stratford.gov.uk/planning-regeneration/landscape-and-green-infrastructure.cfm> [Date Accessed: 14/09/18]

Water and Flooding	<ul style="list-style-type: none">• The level of fluvial flood risk present at each site is based on the Environment Agency's flood risk data, such that:<ul style="list-style-type: none">○ Flood Zone 3: 1% - 3.3+% chance of flooding each year;○ Flood Zone 2: 0.1% - 1% chance of flooding each year; and○ Flood Zone 1: Less than 0.1% chance of flooding each year.• There is the possibility of higher flood risks elsewhere if a site is adjacent to Flood Zones 2 or 3.• Surface water flood risk: Areas of high risk have more than a 3.3% chance of flooding each year, medium risk between 1% - 3.3%, low risk between 0.1% and 1% and very low risk less than a 0.1% chance.• All of the sites assessed in this report are within Flood Zone 1, excluding Site 25.• A number of the sites assessed in this report are within surface water flood risk zones, ranging from low to high risk.
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2.11 Limitations

- 2.11.1 The assessment of reasonable alternatives is limited in terms of available data resources. For example, up to date ecological surveys and/or landscape and visual impact assessments have not been available.
- 2.11.2 Data granularity is sometimes an issue where a dataset does not match the scale of some smaller sites. For example, the character area profiles for the Cotswolds AONB cover larger areas than the relatively small reasonable alternative sites. This restricts the ability of the SEA process to differentiate between sites when assessing their impact on the area profile.
- 2.11.3 All data used is secondary data available from the client team, the NDP group or the Internet. No Historic Environment Record search has been commissioned through Warwickshire County Council.
- 2.11.4 A field visit was carried out on the 19th September 2018. Due to site access restrictions many sites were viewed from the road or pathway.

2.11.5 Properties close to or adjacent to potential development sites were not accessed in order to gain views and evaluate impacts; potential visual impacts have been determined using GVLIA3¹⁶ guidance on receptor significance.

2.12 Pre-mitigation assessment

2.12.1 Whilst the assessment findings have drawn on the assumptions in **Table 2.4**, all assessment information excludes consideration of detailed mitigation; i.e. additional detail or modification to the reasonable alternative that has been introduced specifically to reduce identified environmental effects of that site. This process takes place at the environmental report stage, once preferred options have been identified¹⁷.

2.12.2 Presenting assessment findings 'pre-mitigation' facilitates transparency to the decision makers.

2.12.3 **Chapter 4** identifies ways in which mitigation might usefully be applied to sites so as to reduce environmental impacts. Details of such mitigation need to be carefully considered by the NDP Group when selecting their preferred option for their plan.

¹⁶ Guidelines for Landscape and Visual Impact Assessment version 3 (2013) Landscape Institute.

¹⁷ See Figure 1. Stages in SEA/SA presented in the RTPI Practice Note: Improving the effectiveness and efficiency of SEA/SA for land use plans (2018) p.5

3 Assessment of Reasonable Alternatives

3.1 Reasonable Alternatives

- 3.1.1 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*” (Article 5) and gives “*an outline of the reasons for selecting the alternatives dealt with*” (Annex I).
- 3.1.2 The purpose of this Reasonable Alternatives SEA Report is to enable plan makers to make an informed decision about the final content of the plan. The role of SEA is to inform the plan making group in their selection and assessment of reasonable alternatives.
- 3.1.3 The findings of this Reasonable Alternatives SEA Report 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 of identifying a preferred option.
- 3.1.4 The results of the Reasonable Alternatives SEA Report 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.
- 3.1.5 It should be noted that a further SEA Report will be produced, known as an Environmental Report.
- 3.1.6 The Planning Practice Guidance (PPG) for Strategic environmental assessment and sustainability appraisal¹⁸ states that the environmental report accompanying a neighbourhood plan should:

¹⁸ MHCLG (2018) Guidance: Strategic environmental assessment and sustainability appraisal. Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal> [Date Accessed: 19/09/18]

3.1.7 *“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”.*

“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.

“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”.

3.1.8 The Planning Practice Guidance (PPG) for Neighbourhood Planning¹⁹ states that *“a neighbourhood plan can allocate additional sites to those in a Local Plan where this is supported by evidence to demonstrate need above that identified in the Local Plan”.*

3.1.9 The remainder of this chapter sets out the SEA of reasonable alternative sites. Scores have been presented by SEA Objective in tables which include assessment narrative text.

3.2 Site Assessments

3.2.1 There are 25 alternative sites shown in **Figure 3.1** that have been identified as reasonable alternatives for the Ilmington NDP through a call for sites (CFS) process which was led by the NDP Steering Group. All the sites have been assessed as per the methodology set out in **Chapter 2**.

¹⁹ MHCLG (2018) Guidance: Neighbourhood Planning. Available at:
<https://www.gov.uk/guidance/neighbourhood-planning--2> [Date Accessed: 19/09/18]

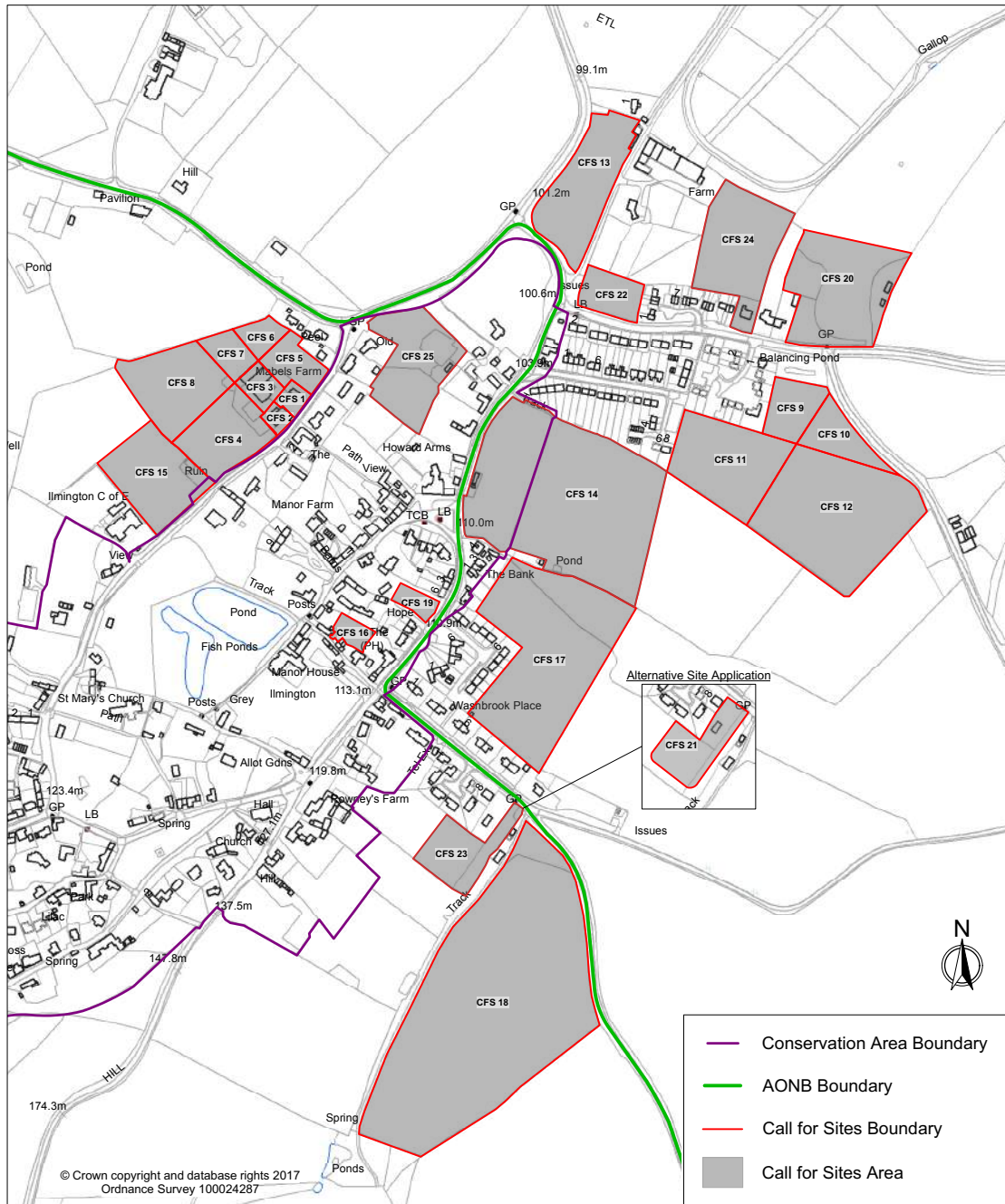


Figure 3.1: Call for Sites map²⁰.

²⁰ Ilmington Neighbourhood Plan Working Group (2018) Report on Call for Sites Exercise.

3.3 Sites CFS 1 to 8 – Mabel’s Farm

3.3.1 The cluster of eight separate sites, forming CFS 1 to 8, are located to the north west of Ilmington village, north of Back Street.

CFS 1

3.3.2 CFS 1 is on land where a single dwelling associated with Mabel’s Farm currently stands. The Site is located directly off Back Street.

Score	Site CFS 1
0	<p>Cultural Heritage</p> <p>CFS 1 is adjacent to, and visible from, the Ilmington Conservation Area. As the Ilmington Conservation Area Review²¹ describes the current site as an “eyesore”, development at this location would be unlikely to impact the Conservation Area. Although in close proximity to the Listed Buildings ‘Mabel’s Farmhouse’, the site is a brownfield and development would not be expected to impact the heritage assets and therefore have a negligible impact on the cultural heritage objective</p>
0	<p>Landscape</p> <p>CFS 1 is wholly within the Cotswolds AONB and located in an area described as having medium landscape sensitivity to housing development in the White Consultants Landscape Sensitivity Assessment of Local Service Villages²². However, CFS 1 is located on brownfield land where a current dwelling stands and therefore it is unlikely that development at this location would alter the character of the Cotswolds AONB or local landscape. Therefore, development at this location would be considered to be likely to have a negligible impact on the landscape objective.</p>
0	<p>Water and flooding</p> <p>Within the Site there is a small area of low-risk surface water flooding. However, due to the small area of flood risk, development at this location would be expected to result in a negligible impact on the water and flooding objective.</p>

²¹ Stratford on Avon District Council (1995) Conservation Area Reviews: Ilmington. Available at: <https://www.stratford.gov.uk/doc/206075/name/Ilmington%20Conservation%20Area.pdf> [Date Accessed: 17/10/18]

²² White Consultants (2012) Landscape Sensitivity Assessment of Local Service Villages. Available at: <https://www.stratford.gov.uk/planning-regeneration/landscape-and-green-infrastructure.cfm> [Date Accessed: 17/10/18]

CFS 2

3.3.3 CFS 2 is located directly off Back Street and is currently occupied by agricultural buildings associated with Mabel's Farm.

Score	Site CFS 2
0	<p>Cultural Heritage</p> <p>The Site is adjacent to the Ilmington Conservation Area. As the Ilmington Conservation Area Review describes the site as an “eyesore”, development at this location would be unlikely to impact the Conservation Area. CFS 2 is in close proximity to Mabel's Farmhouse, but as the land is already inhabited by agricultural buildings, development here is not expected to alter the setting and have an overall negligible impact on the cultural heritage objective.</p>
0	<p>Landscape</p> <p>CFS 2 is within the Cotswolds AONB and within an area of medium landscape sensitivity to housing development. A public footpath follows the site boundary to the south west. Although the site is a greenfield, it is unlikely that the scale of residential development proposed at the site, which would be replacing farm buildings, would have a significant adverse impact on the character of the Cotswolds AONB or the local landscape. Development at the site would be likely to have a negligible impact on the landscape objective.</p>
0	<p>Water and flooding</p> <p>CFS 2 is within an area of low-risk surface water flooding but due to the small scale of development, would be expected to result in a negligible impact on the water and flooding objective.</p>

CFS 3

3.3.4 CFS 3 is located on greenfield land where large cow sheds and milking parlour presently stand.

Score	Site CFS 3
0	<p>Cultural Heritage</p> <p>As CFS 3 has been described as an “eyesore” in the Ilmington Conservation Area Review, it is unlikely that development at this location would impact the Conservation Area. As CFS 3 is currently shielded from the Listed building ‘Mabel’s Farmhouse’, it is considered to be unlikely that development here would impact the historic asset. Development at CFS 3 would have a negligible impact on the cultural heritage objective.</p>
0	<p>Landscape</p> <p>CFS 3 is within the Cotswolds AONB and within an area of medium landscape sensitivity to housing development. The site is a greenfield and a public footpath follows the western boundary, however, it is unlikely that the scale of residential development proposed at the site, which would be replacing farm buildings, would have a significant adverse impact on the character of the Cotswolds AONB or the local landscape. Development at the site would be likely to have a negligible impact on the landscape objective.</p>
0	<p>Water and flooding</p> <p>CFS 3 is partially within an area of low-risk surface water flooding. At this stage of assessment, it is unlikely that development would result in a negative impact on the water and flooding objective.</p>

CFS 4

3.3.5 CFS 4 is located directly off Back Street and is currently greenfield land used for agricultural purposes and associated with Mabel's Farm.

Score	Site CFS 4
-	<p>Cultural Heritage</p> <p>Land at CFS 4 is adjacent to the Conservation Area and could affect views into and out of it. The land at CFS 4 is in close proximity to Mabel's Farmhouse, located approximately 20m away. Development at this location would be likely to alter the setting of this Listed Building to some extent and therefore, a minor negative impact on the cultural heritage objective cannot be ruled out.</p>
-	<p>Landscape</p> <p>CFS 4 is within the Cotswolds AONB. The site is within land cover parcel Im12, an area of medium sensitivity to housing development, in the Landscape Sensitivity Assessment. The Assessment states that development may be appropriate "in the two fields to the south east abutting Back Street", which is likely to include CFS 4. However, due to the size of the site, development here could potentially alter some views of the AONB and open countryside. The Site is a greenfield and development at this location could potentially alter the character of the local landscape. Development at CFS 4 would be likely to alter the views for some sensitive receptors including residents of Back Street and users of the local PRow network and highways footpaths, primarily because a public footpath crosses the site. Overall, development at this location could potentially have a minor negative impact on the landscape objective.</p>
0	<p>Water and flooding</p> <p>A small area of CFS 4 is located within an area of low-risk surface water flooding. At this stage of assessment, a negative impact on the water and flooding objective can be objectively ruled out.</p>

CFS 5

3.3.6 CFS 5 is located directly off Back Street. The Site is currently used for agriculture and is associated with Mabel's Farm.

Score	Site CFS 5
-	<p>Cultural Heritage</p> <p>CFS 5 is located adjacent to the Ilmington Conservation Area. As the land surrounding Mabel's Farm has been described as an "eyesore" in the Ilmington Conservation Area Review, it is likely that development here would have a negligible impact on the Conservation Area.</p> <p>The site is situated on the opposite side of Back Street to the Listed Building 'Folly Farmhouse' Development at this site would be likely to alter the setting of this Listed Building and therefore would be likely to have a minor negative impact on the cultural heritage objective.</p>
0	<p>Landscape</p> <p>The Site is within the Cotswolds AONB and within land cover parcel Im12 in the Landscape Sensitivity Assessment, described as an area of medium sensitivity to housing development. The Assessment states that development may be appropriate <i>"in the two fields to the south east abutting Back Street"</i>, which is likely to include CFS 5. CFS 5 is situated on greenfield land and development at this location could potentially alter views for sensitive receptors, including residents of Mickleton Road and Back Street, as well as users of the local PRow network and highway footpaths. However, due to the statements made in the Landscape Sensitivity Assessment and the small scale of development proposed on the site, it is considered to be likely that development at CFS 5 would have a negligible impact on the landscape objective.</p>
0	<p>Water and flooding</p> <p>A small area of CFS 5 is within an area of low-risk surface water flooding but development at the site would be likely to have a negligible impact on the water and flooding objective.</p>

CFS 6

3.3.7 CFS 6 is located on agricultural greenfield land currently associated with Mabel’s Farm.

Score	Site CFS 6
-	<p>Cultural Heritage</p> <p>The Ilmington Conservation Area Review describes the land at CFS 6 as an “eyesore” and as such, development here would be unlikely to negatively impact the Conservation Area. Development at this location could potentially alter the setting of the Listed Building ‘Folly Farmhouse’. At this stage, a minor negative impact on the cultural heritage objective cannot be ruled out.</p>
0	<p>Landscape</p> <p>CFS 6 is wholly within the Cotswolds AONB and within an area of medium landscape sensitivity to housing development according to the landscape Sensitivity Assessment. The Assessment states that development may be appropriate “in the two fields to the south east abutting Back Street”, which likely to include CFS 6. Development at CFS 6 could potentially alter the views from sensitive receptors, in particular residents of Mickleton Road, as well as users of the local PRow network and highway footpaths. The Site is currently an agricultural greenfield and therefore development here could alter the character of the local landscape. Overall, due to the scale of CFS 6 and the comments made in the Landscape Sensitivity Assessment, development at this location would be likely to have a negligible impact on the landscape objective.</p>
0	<p>Water and flooding</p> <p>A small proportion of CFS 6 is within an area of low-risk surface water flooding, however, it would be likely to have a negligible impact on the water and flooding objective.</p>

CFS 7

3.3.8 CFS 7 is a greenfield location, currently used for agricultural purposes associated with Mabel's Farm.

Score	Site CFS 7
0	<p>Cultural Heritage</p> <p>CFS 7 is not viewable from any historic assets within Ilmington, including Listed Buildings or the Conservation Area. Development here would be likely to have a negligible impact on the cultural heritage objective.</p>
0	<p>Landscape</p> <p>CFS 7 is wholly within the Cotswolds AONB. It is also in area described as having medium landscape sensitivity to housing development in the Landscape Sensitivity Assessment. According to the Assessment, CFS 7 could be appropriate land for housing development. The Site is currently a greenfield location and therefore development could potentially alter the character of the local landscape. A public footpath follows the western boundary of the Site and it would be likely that development at CFS 7 would alter the views for the users of this footpath as well as the wider PRow network and highway footpaths. However, due to the scale of development and its location, it would be likely that development this location would have a negligible impact on the landscape objective.</p>
+	<p>Water and flooding</p> <p>The Site is not situated within a surface water flood zone and is within fluvial Flood Zone 1. By placing new residents at this location, it would be likely to help to ensure that a significant proportion of new residents are not exposed to flood risk.</p>

CFS 8

3.3.9 CFS 8 is the largest of the eight sites in this cluster and is currently an agricultural greenfield associated with Mabel's Farm.

Score	Site CFS 8
-	<p>Cultural Heritage</p> <p>Land at CFS 8 is in close proximity to the Conservation Area and could affect views into and out of it. Development at the site is likely to be visible from the Listed Building 'Mabel's Farmhouse and could potentially alter the setting of this building. Therefore, at this stage, a minor negative impact on the cultural heritage objective cannot be ruled out.</p>
-	<p>Landscape</p> <p>CFS 8 is wholly within the Cotswolds AONB. The site is within land cover parcel Im12, an area of medium sensitivity to housing development in the Landscape Sensitivity Assessment. The Assessment states that development may be appropriate <i>"in the two fields to the south east abutting Back Street"</i>, which is likely to include CFS 8. However, due to the size of the site and its distance from Back Street, development here could potentially alter some views of the AONB and open countryside. The Site is a greenfield and development at this location could potentially alter the character of the local landscape. It would be likely that development at this location would alter the views for users of the PRow network and highway footpaths as well as residents of Back Street. Overall, the development of dwellings at this location would be likely to have a minor negative impact on the landscape objective.</p>
+	<p>Water and flooding</p> <p>The Site is not situated within a surface water flood zone and is within fluvial Flood Zone 1. By placing new residents at this location, it would be likely to help to ensure that a significant proportion of new residents are not exposed to flood risk.</p>

3.4 Sites CFS 9 to 12 - Land east of Keyte Road

3.4.1 The four individual parcels of land make up wider agricultural fields located to the north east of Ilmington village. The land is south east of Wilkins Way and Keyte Road.

CFS 9

3.4.2 CFS 9 is located east of the houses at Wilkins Way and south of Armscote Road.

Score	Site CFS 9
-	<p>Cultural Heritage</p> <p>It is unlikely that development on CFS 9 would visually impact the Ilmington Conservation Area. However, the site is situated on non-designated ridge and furrow which relate to the character of the rural village. Development here would be expected to result in the loss of this feature and therefore have a minor negative impact on the cultural heritage objective.</p>
0	<p>Landscape</p> <p>CFS 9 is located within land cover parcel Im03, which is described as having medium landscape sensitivity to housing development in the Landscape Sensitivity Assessment, primarily due to the site covering fields of ridge and furrow. However, the Assessment states that <i>“the settlement edge is unsightly and might benefit from either screening with trees or by development in the northern third of the adjacent field”</i>, which is likely to include CFS 9. Although the site is a greenfield, it is likely that development at this location would not significantly alter the character of the local landscape. Development at CFS 9 could potentially have a negligible impact on the landscape objective.</p>
-	<p>Water and flooding</p> <p>The northern half of CFS 9 is within a low-risk surface water flood zone as well as a small corner of the Site being at medium risk of surface water flooding. Development at this site would be likely to have a minor negative impact on the water and flooding objective.</p>

CFS 10

3.4.3 CFS 10 is located directly off the lane that leads south from Armscote Road.

Score	Site CFS 10
-	<p>Cultural Heritage</p> <p>Development at CFS 10 would be unlikely to be visible from Ilmington Conservation Area. CFS 10 is situated on non-designated ridge and furrow which relate to the character of the rural village. Development here would be expected to result in the loss of this feature and therefore have a minor negative impact on the cultural heritage objective.</p>
-	<p>Landscape</p> <p>CFS 10 is located within land cover parcel Im03, an area of medium landscape sensitivity to housing development, primarily due to the presence of ridge and furrow on site. It is unlikely that CFS 10 coincides with the “northern third of the adjacent field” described in the Landscape Sensitivity Assessment where development could potentially be appropriate. Therefore, it is likely that the proposed development on this previously undeveloped land, would alter the local landscape to some extent. Development on site would be likely to alter the views of residents of Wilkins Way, Keyte Road and Armscote Road as well as users of the local PRoW network and highway footpaths. Therefore, development at this location has the potential to have a minor negative impact on the landscape objective.</p>
--	<p>Water and flooding</p> <p>A small area to the south east of CFS 10 is within a high-risk surface water flood zone. Therefore, development at this location could potentially have a major negative impact on the water and flooding objective.</p>

CFS 11

3.4.4 CFS 11 is located east of houses at Kyte Road and south of houses at Wilkins Way.

Score	Site CFS 11
-	<p>Cultural Heritage</p> <p>Due to the contour of the land, it is unlikely that development at CFS 11 would lead to significant impacts on views out of the Conservation Area. The site is of locally important, non-designated, ridge and furrow. Development here would result in the loss of this heritage asset and therefore have a minor negative impact on the cultural heritage objective.</p>
--	<p>Landscape</p> <p>CFS 11 is located in land cover parcel Im03 in the Landscape Sensitivity Assessment, which states that <i>“the sensitivity of the area lies particularly in its ridge and furrow and its rural character on the settlement approaches”</i> and has therefore been described as having medium landscape sensitivity to housing development. The assessment identifies fields to the north of Im03 as having potential for housing development. CFS 11 is not included in these fields and thus it is considered to be likely that housing development in this location would be inappropriate. Development at this location would be likely to alter the views for residents at Keyte Road and Wilkins Way, as well as potentially some users of the local PRoW network and highway footpaths. As a greenfield site, development at this location would be likely to alter the character of the local landscape to some extent. Although in an area of medium sensitivity to housing development, it is likely that the scale of the development proposed at CFS 11 would have a major negative impact on the landscape objective.</p>
+	<p>Water and flooding</p> <p>The Site is not situated within a surface water flood zone and is within fluvial Flood Zone 1. By placing new residents at this location, it would be likely to help to ensure that a significant proportion of new residents are not exposed to fluvial flood risk.</p>

CFS 12

3.4.5 This Site is located directly off the lane that runs south off Armscote Road.

Score	Site CFS 12
-	<p>Cultural Heritage</p> <p>Although unlikely to impact local Listed Buildings or Ilmington Conservation Area, the site is situated on non-designated ridge and furrow which relates to the character of the rural village. Development here would be expected to result in the loss of this feature and therefore have a minor negative impact on the cultural heritage objective.</p>
--	<p>Landscape</p> <p>CFS 12 is located in land cover parcel Im03 in the Landscape Sensitivity Assessment, which states that <i>“the sensitivity of the area lies particularly in its ridge and furrow and its rural character on the settlement approaches”</i> and has therefore been described as having medium landscape sensitivity to housing development. The assessment identifies fields to the north of Im03 as having potential for housing development. CFS 12 is not included in these fields and thus it is considered to be likely that housing development in this location would be inappropriate. The development of dwellings at this location would be likely to alter the character of the local landscape and alter views to some sensitive receptors. This could include users of the local PRow network and highway footpaths or local residents situated to the east of the village. Any development at this location would be expected to have a major negative impact on the landscape objective.</p>
--	<p>Water and flooding</p> <p>A large area to the east of CFS 12 is within a high-risk surface water flood zone. Development at this site would be likely to have a major negative score on the water and flooding objective.</p>

3.5 CFS 13 – Land north of Front Street

3.5.1 CFS 13 is located to the north of Ilmington village, east of Stratford Road and north of Front Street. The Site is currently agricultural land.

Score	Site CFS 13
-	<p>Cultural Heritage</p> <p>CFS 13 is in close proximity to the Ilmington Conservation Area to the north and the development of housing at this greenfield would be likely to alter the setting of the Conservation Area to some extent. This could potentially have a minor negative impact on the cultural heritage objective.</p>
--	<p>Landscape</p> <p>CFS 13 is adjacent to the Cotswolds AONB to the north west. According to the Landscape Sensitivity Assessment, CFS 13 is within land cover parcel Im01, which is described as having a high/medium sensitivity to housing development. Within this land parcel, there is <i>“some limited potential in the small plot on the southern edge, just west of existing dwellings, but extending no further north”</i>. CFS 13 does not coincide with this description and as such, housing development at the site would be likely to be inappropriate in terms of landscape sensitivity. Development at CFS 13 would be likely to alter the views of some sensitive receptors, including users of public bridleway which follows the site boundary to the east, and residents of Front Street and Armscote Road. The change of the site from a greenfield to housing would be likely to alter the character of the local landscape to some extent. Development at this site could potentially have a major negative impact on the landscape objective.</p>
--	<p>Water and flooding</p> <p>Large areas of the site are within high risk surface water flood zones and therefore a major negative impact on the water and flooding objective cannot be ruled out.</p>

3.6 CFS 14 – Land south of Bennetts Place and east of Font Street

3.6.1 CFS 14 is a large site located to the east of the main village of Ilmington, east of Front Street and south of Bennett Place. The Site currently consists of agricultural fields. The Long Distance Path ‘Centenary Way’ runs through the southern part of the site.

Score	Site CFS 14
--	<p>Cultural Heritage</p> <p>The Site is partially within the Ilmington Conservation Area and would be likely to alter the character of the Conservation Area. It is considered to be likely that development at CFS 14 would be viewable from Listed Buildings located in close proximity to the site, to the north of Front Street. The Ilmington Conservation Area Review states the site provides a good setting to some Listed Buildings and therefore development on the large, open field at CFS 14 would be likely to alter the setting of these Listed Buildings. Development at this location would therefore be expected to have a major negative impact on the cultural heritage objective. In addition, aerial photography appears to show evidence of ridge and furrow at this location. It would be useful to clarify this as loss of such a resource should be avoided.</p>
--	<p>Landscape</p> <p>CFS 14 is adjacent to the Cotswolds AONB to the east. Development at this large Site would be considered to be likely to alter some views of the AONB and open countryside and potentially result in areas of urban sprawl. The Site is a large greenfield and it would be likely that development at this location would alter the character of the local landscape. The Site has been described as being at high sensitivity to housing development in the Landscape Sensitivity Assessment of Local Service Villages and ‘forms a distinctive rural green edge’ to the village. Development at this location would be likely to alter the views to sensitive receptors, including residents of Front Street, Bennett Place and Elm Close, as well as users of the local PRoW network and highway footpaths, with the Centenary Way (Warwickshire) running through the southern edge of the site. It is likely that development at this location would have a major negative impact on the landscape objective.</p>
+	<p>Water and flooding</p> <p>The Site is not situated within a surface water flood zone and is within fluvial Flood Zone 1. By placing new residents at this location, it would be likely to help to ensure that a significant proportion of new residents are not exposed to fluvial flood risk.</p>

3.7 CFS 15 – Land adjacent to School, Back Street

3.7.1 The Site is located to the west of Ilmington village, to the north of Back Street. The Site is currently used for agriculture. Public footpaths cross the site from north to south and follow the western boundary.

Score	Site CFS 15
-	<p>Cultural Heritage</p> <p>CFS 15 is located opposite and within view of Sansome House, a Grade II Listed Building which can be seen from the footpaths at this location, contributing to the view. The Site abuts and is visible from the Conservation Area. Development at the site could potentially alter the setting of these heritage assets. Therefore, a minor negative impact on the cultural heritage objective could potentially be likely.</p>
-	<p>Landscape</p> <p>CFS 15 is wholly within the Cotswolds AONB. The site is within an area of medium sensitivity to housing development in the Landscape Sensitivity Assessment (area Im12). The Assessment states that development may be appropriate <i>“in the two fields to the south east abutting Back Street”</i>, which includes CFS 15. However, due to the size of the site, development here could potentially alter some views of the AONB and open countryside. The Site is on previously undeveloped land and as such, development at this location would be expected to alter the character of the local landscape to some extent. A public footpath crosses the Site and one follows the site border to the south west. It would be likely that development at this location would alter the views for users of the local PRow network and highway footpaths as well as residents on Back Street. A minor negative impact on the landscape objective would be considered to be likely.</p>
+	<p>Water and flooding</p> <p>The Site is not situated within a surface water flood zone and is within fluvial Flood Zone 1. By placing new residents at this location, it would be likely to help to ensure that a significant proportion of new residents are not exposed to fluvial flood risk.</p>

3.8 CFS 16 – Land adjoining the Cottage, Ballard’s Lane

3.8.1 CFS 16 is located in the centre of Ilmington village, north of Ballards Lane. The Site is currently a remnant orchard and has limited access due to existing buildings.

Score	Site CFS 16
-	<p>Cultural Heritage</p> <p>The site is within the Ilmington Conservation Area. Development within this site could potentially alter the character of the Ilmington Conservation Area and the setting of some Listed Buildings, leading to a minor negative impact on the cultural heritage objective.</p>
0	<p>Landscape</p> <p>CFS 16 is wholly within the Cotswolds AONB and within the centre of the village. The small site is surrounded by development on all four sides. The addition of housing is unlikely to result in a negative impact on the nationally protected landscape. The small-scale development proposed at this location would be likely to have a negligible impact on the landscape objective.</p>
+	<p>Water and flooding</p> <p>The Site is not situated within a surface water flood zone and is within fluvial Flood Zone 1. By placing new residents at this location, it would be likely to help to ensure that a significant proportion of new residents are not exposed to fluvial flood risk.</p>

3.9 CFS 17 – Land to the rear of Elm Close

3.9.1 CFS 17 is located to the east of Ilmington village, east of Elm Close and north of Ballards Lane. The site is currently agricultural land, with open countryside to the north and east.

Score	Site CFS 17
-	<p>Cultural Heritage</p> <p>CFS 17 is in close proximity to the Ilmington Conservation Area. The large-scale development proposed at CFS 17 would be likely to alter the setting of the Conservation Area to some extent. Therefore, a minor negative impact on the cultural heritage objective cannot be ruled out.</p>
--	<p>Landscape</p> <p>The Site is situated less than 50m away from the Cotswolds AONB at its closest point. It is considered to be likely that development here would alter some views of the AONB and open countryside and lead to urban sprawl. The Site is within an area of high sensitivity to housing development, with the fields providing a distinctive rural edge to the village. The large number of dwellings proposed at the site would be likely to alter the views of sensitive receptors, including users of the local PRoW network, with the Centenary Way (Warwickshire) public footpath bordering the site, as well as highway footpaths and residents of Ballards Land, Elm Close and Front Street. The Site is previously undeveloped and development at this location would be likely to alter the character of the local landscape. It is considered to be likely that development at this location would have a major negative impact on the landscape objective.</p>
0	<p>Water and flooding</p> <p>Two small areas to the south of the Site are within the low risk surface water flood zone. It is unlikely that development at the site would have a significant impact on surface water and would have a negligible impact on the water and flooding objective.</p>

3.10 CFS 18 – ‘Swinstry Field’, south of Featherbed Lane

3.10.1 CFS 18 is located to the far south of Ilmington village south of Featherbed Lane. The Site is a large, open, agricultural field.

Score	Site CFS 18
-	<p>Cultural Heritage</p> <p>CFS 18 is outside of the Conservation Area. However, as a large Site, development at this location would be likely to be visible from Listed Buildings located to the east of Foxcote Hill and the Conservation Area and could potentially alter the setting of these heritage assets. At this stage of assessment, a negative impact on the cultural heritage objective cannot be ruled out.</p>
--	<p>Landscape</p> <p>CFS 18 is within an area of high sensitivity to housing development according to the Landscape Sensitivity Assessment of Local Service Villages, primarily due to its large, open fields. The large-scale development proposed at this location would be likely to alter the views of some sensitive receptors including residents of Foxcote Hill, Front Street and Ballards Lane. The Site is a greenfield, and as such, the proposed development at this location will be expected to alter the character of the local landscape. This large site is located outside the built-up area boundary and development here would be likely to lead to urban sprawl into the surrounding countryside. The site is wholly within the Cotswolds AONB and it is considered to be likely that development here would alter some important views to and from the AONB. It is expected that the proposed development at CFS 18 would have a major negative impact on the landscape objective.</p>
-	<p>Water and flooding</p> <p>Large proportions of CFS 18 are within areas of low-risk surface water flooding, with some smaller areas to the north of the site in medium risk zones. As a large site, it would be expected that development on CFS 18 could potentially exacerbate surface water flood risk in other areas of the Parish. Therefore, a minor negative impact on the water and flooding objective cannot be ruled out.</p>

3.11 CFS 19 – Middle Meadow Orchard, Front Street

3.11.1 Three dwellings are proposed at CFS 19, located in the centre of Ilmington village. The Site is located along Front Street, opposite Elm Close. The Site is within the remnant orchard of the Grade II Listed Building ‘Middle Meadow and Attached Outbuilding’ which is located off Middle Street.

Score	Site CFS 19
--	<p>Cultural Heritage</p> <p>CFS 19 is within the Ilmington Conservation Area and forms part of the setting for several Listed Buildings within the village. Development within this site would be likely to alter the character of the Ilmington Conservation Area and the setting of some Listed Buildings. The site is also Ilmington’s last remaining burgage plot and therefore, development here would be expected to have a major negative impact on the cultural heritage objective.</p>
0	<p>Landscape</p> <p>CFS 19 is situated within the centre of the Ilmington and wholly within the Cotswolds AONB. The site is surrounded by residential development as well as trees and hedgerows. The small-scale development proposed at CFS 19 would be likely to have a negligible impact on the landscape objective.</p>
0	<p>Water and flooding</p> <p>An area at the centre of the site is located within the low-risk surface water flood zone. Due to the small area at flood risk, it is considered to be likely that development at this location would have a negligible impact on the water and flooding objective.</p>

3.12 CFS 20 – Land north of Armscote Road

3.12.1 CFS 20 is located towards the north eastern corner of Ilmington Village, north of Armscote Road. Part of the site is an annex to a residential garden and part is an agricultural field. There is open countryside on all sides apart from an adjoining residential property.

Score	Site CFS 20
0	<p>Cultural Heritage</p> <p>CFS 20 is located to the north east of Ilmington village, outside of the village boundary and Ilmington Conservation Area. It is considered to be unlikely that development at this location would be viewable from any Listed Buildings within the village or the Conservation Area and therefore would be expected to have a negligible impact on the cultural heritage objective.</p>
--	<p>Landscape</p> <p>CFS 20 is not within the Cotswolds AONB but is within an area of high/medium sensitivity to housing development according to the White Consultant's Landscape Sensitivity Assessment. The site is sensitive due to its open, rural character. The site has limited connection with the built-up area of Ilmington, with houses located along only one side of the site, and development is likely to lead to sprawl into the open countryside. The Site is previously undeveloped, and it would be likely that development at this location would alter the character of the local landscape to some extent. Development at this location could potentially alter views for sensitive receptors including users of the local PRow network, highway footpaths and residents of Armscote Road. Development at this location would be likely to result in a major negative impact on the landscape objective.</p>
--	<p>Water and flooding</p> <p>A small area to the south east of CFS 20 is within a high-risk surface water flood zone. At this stage of assessment, a major negative impact cannot be ruled out.</p>

3.13 CFS 21 – Land adjacent to Nellands Close

3.13.1 CFS 21 is located to the south east of Ilmington village, south of Ballards Lane. This Site currently comprises the property known as Nellands Cottage and part of an agricultural field to the south.

Score	Site CFS 21
+/-	Cultural Heritage
It is unlikely that development at CFS 21 would impact any heritage assets within Ilmington and would therefore be expected to have a negligible impact on the cultural heritage objective. However aerial photography appears to show evidence of ridge and furrow at this location. It would be useful to clarify this as loss of such a resource should be avoided.	
--	Landscape
CFS 21 is wholly within the Cotswolds AONB. This Site has been described as having a high/medium sensitivity to housing in the Landscape Sensitivity Assessment, which states; <i>“the only opportunity [for housing development] would be the small field directly south of Ballards Lane housing but the density should be low”</i> . This refers to only a small section of CFS 21 and development at this location could potentially alter the character of the AONB and would be inappropriate for housing development. The Site is primarily a greenfield, and the proposed development could potentially alter the character of the local landscape, as well as alter the views for residents at Nellands Close to some extent. At this stage of assessment, a major negative impact on the landscape objective cannot be ruled out.	
0	Water and flooding
Some small areas of the site are within the low-risk surface water flood zone. However, due to the small scale of flood risk, it is likely to have a negligible impact on the water and flooding objective.	

3.14 CFS 22 – Land north of Armscote Road, at junction with Front Street

3.14.1 CFS 22 is located to the north of Ilmington village, north of Armscote Road. A public footpath crosses the site from south west to north east.

Score	Site CFS 22
-	<p>Cultural Heritage</p> <p>CFS 22 is in close proximity to the Ilmington Conservation Area and the proposed development may alter the setting of the Conservation Area. At this stage of assessment, a minor negative impact on the cultural heritage objective is possible.</p>
0	<p>Landscape</p> <p>CFS 22 is in close proximity to the boundary of the Cotswolds AONB and has been described as an area of high/medium sensitivity to housing development in the Landscape Sensitivity Assessment, which states that there is <i>“some limited potential in the small plot on the southern edge, just west of existing dwellings, but extending no further north”</i>. The site is previously undeveloped, with a public footpath that crosses the site; a public bridleway runs north-south alongside the immediate site boundary to the west of the site. Development at this location would alter the local landscape to some extent. However, due to the small scale of the site and the comments stated within the Landscape Sensitivity Assessment, development at this site would be likely to have a negligible impact on the landscape objective.</p>
-	<p>Water and flooding</p> <p>CFS 22 is adjacent to an area of high-risk surface water flooding. On site, there are areas of low and medium risk surface water flooding and therefore development of this site could potentially have a minor negative impact on the water and flooding objective to some extent.</p>

3.15 CFS 23 – Land to the rear of Nellands Close

3.15.1 This Site covers the same parcel of land as CFS 21 but excludes the cottage and its curtilage. It is located to the south east of Ilmington village, south of Ballards Lane.

Score	Site CFS 23
+/-	Cultural Heritage
It is unlikely that development at CFS 23 would impact any heritage assets within Ilmington and would therefore be expected to have a negligible impact on the cultural heritage objective. However aerial photography appears to show evidence of ridge and furrow at this location. It would be useful to clarify this as loss of such a resource should be avoided.	
--	Landscape
CFS 23 is wholly within the Cotswolds AONB. This Site has been described as having a high/medium sensitivity to housing in the Landscape Sensitivity Assessment, which states “ <i>the only opportunity [for housing development] would be the small field directly south of Ballards Lane housing but the density should be low</i> ”. As a larger site than stated here, development at this location could potentially alter the character of the AONB and would be inappropriate for housing development. The Site is primarily undeveloped greenfield, and the proposed development could potentially alter the character of the local landscape, as well as alter the views of residents at Nellands Close to some extent. At this stage of assessment, a major negative impact on the landscape objective cannot be ruled out.	
0	Water and flooding
Areas to the north and the south of the site are within low-risk surface water flood zones. As these areas are small, development here would be likely to have a negligible impact on the water and flooding objective.	

3.16 CFS 24 – Land to the north of Paddocks, Armscote Road

3.16.1 CFS 24 is located to the north of Ilmington village, north of Armscote Road. The Site comprises of a paddock to the rear of one household, which would likely be demolished to allow development and access on Site.

Score	Site CFS 24
0	<p>Cultural Heritage</p> <p>It is unlikely that development at CFS 24 would impact any recorded heritage assets within Ilmington and would therefore be expected to have a negligible impact on the cultural heritage objective.</p>
--	<p>Landscape</p> <p>The Site is located a less than 150m away from the boundary of the Cotswolds AONB and forms part of the hinterland setting. According to the Landscape Sensitivity Assessment, the site is within land cover parcel Im01, which is described as having a high/medium sensitivity to housing development. Within this land parcel, there is “some limited potential in the small plot on the southern edge, just west of existing dwellings, but extending no further north”. CFS 24 does not coincide with this description and as such, development at the site would be likely to be inappropriate in terms of landscape sensitivity. Development at this site could potentially lead to urban sprawl of development into the open countryside. The Site is primarily previously undeveloped land and as such it would be likely that development at this location would alter the existing character of the local landscape to some extent. As well as potentially altering views for current residents of Armscote Road, development at CFS 24 would be likely to alter views from the local PRow network and highway footpaths, with one public footpath crossing the site. Overall, a major negative impact on the landscape objective cannot be ruled out.</p>
--	<p>Water and flooding</p> <p>Areas to the north of CFS 24 are within high risk surface water flood zones, as well as other areas of the site being within low and medium risk surface water flood zones. At this stage of assessment, a major negative impact on the water and flooding objective cannot be ruled out.</p>

3.17 CFS 25 - Land adjacent to Mickleton Road, between Back Street and Front Street

3.17.1 The Site is located within Ilmington village to the north, south of Mickleton Road. The Site is surrounded by dwellings to the west, east and south. The Site currently consists of paddocks and gardens.

Score	Site CFS 25
-	<p>Cultural Heritage</p> <p>CFS 25 is located within Ilmington Conservation Area. The Site is also likely to be visible from several Grade II Listed Buildings within the village centre. The proposed development at this site would be likely to alter the character of the Conservation Area and the setting of these Listed Buildings. Development at CFS 25 would be likely to have a minor negative impact on the cultural heritage objective.</p>
-	<p>Landscape</p> <p>The site is located wholly within the Cotswolds AONB and is in an area of medium/high sensitivity to housing development in the White Consultants Landscape Sensitivity Assessment of Local Service Villages. The site is a key area of greenspace within Ilmington village, contributing to the village character as well as that of the AONB. In terms of the AONB, the site is relatively enclosed by the wider settlement of Ilmington; no significant effects on the AONB are expected.</p> <p>Development at this location would be expected to alter the character of the local landscape. There is a public footpath less than 100m south of the Site, and development on site could potentially alter views for users of the PRow network and highway footpaths, as well as residents along Front Street and Back Street. Overall, a minor negative impact on the landscape objective cannot be ruled out.</p>
--	<p>Water and flooding</p> <p>Almost the entirety of CFS 25 is at low risk of surface water flooding, with large areas at medium risk and small areas at high risk to the west and north of the Site. At this stage of the process, a major negative impact on the water and flooding objective cannot be ruled out.</p>

3.18 Overview of assessment results

3.18.1 The scores for each site assessed in this report have been brought together in **Table 3.1**.

Table 3.1: SEA scores for the reasonable alternative sites assessed in this report

Site reference number	SEA Objective		
	Cultural Heritage	Landscape	Water and flooding
CFS 1	0	0	0
CFS 2	0	0	0
CFS 3	0	0	0
CFS 4	-	-	0
CFS 5	-	0	0
CFS 6	-	0	0
CFS 7	0	0	+
CFS 8	-	-	+
CFS 9	-	0	-
CFS 10	-	-	--
CFS 11	-	--	+
CFS 12	-	--	--
CFS 13	-	--	--
CFS 14	--	--	+
CFS 15	-	-	+
CFS 16	-	0	+
CFS 17	-	--	0
CFS 18	--	--	-
CFS 19	-	0	0
CFS 20	0	--	--
CFS 21	+/-	--	0
CFS 22	-	0	-
CFS 23	+/-	--	0
CFS 24	0	--	--
CFS 25	-	-	--

3.18.2 The following sections present information by SEA topic and discuss the best performing options. There is no single best performing site that will deliver all the planned development for the plan.

3.18.3 The close spatial proximity of the 25 sites makes identifying a best performing site across the three SEA objectives difficult. Many of the sites score negatively due to their close proximity to historic assets or high landscape sensitivity to housing development.

3.19 Cultural heritage

3.19.1 In terms of cultural heritage impacts, CFS 1, 2, 3, 7, 20 and 24 would be likely to have negligible impacts on historic assets, primarily due to being brownfield sites or due to the distance of the sites from heritage assets within Ilmington village. These sites are furthest from the Ilmington Conservation Area and Listed Buildings within the village, which reduces the possibility that development at these locations would result in a significant negative impact on local heritage assets.

3.20 Landscape

3.20.1 There are ten sites which would be expected to have negligible impacts on the landscape objective. Of these, CFS 1, 2 and 3 are likely to be the best performing options as the development proposed on site would be the replacement of a dwellings or farm outbuildings, and therefore, would be the least likely to alter the current character of the local landscape.

3.21 Water and flooding

3.21.1 In terms of water and flooding, CFS 7, 8, 11, 14, 15 and 16 have been identified as the best performing sites as none of the sites are at any risk of fluvial or pluvial flooding. Development at these locations would be likely to ensure new residents are not placed in locations at risk of fluvial or pluvial flooding.

3.22 Further studies

3.22.1 Site-specific analysis could be used to assess the cultural heritage and landscape impacts of each site in more detail. The output from these assessments would better inform future environmental assessment work. Further work that could be undertaken to provide more detailed environmental information could include the following:

- Heritage impact assessments;
- Visual impact assessments and
- Strategic Flood Risk Assessment.

4 Mitigation considerations

- 4.1.1 Recommendations for measures which would be likely to help mitigate negative impacts have been made in **Box 4.1**.
- 4.1.2 The mitigation hierarchy is a sequential process that operates in the following way: firstly, if possible, negative impacts 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, compensation measures should be considered.
- 4.1.3 It should be noted that the adoption of these mitigation recommendations does not ultimately result in the 'fix' of the adverse impact awarded to the SEA Objective. These recommendations can help reduce the severity of many adverse impacts but are unlikely to solve them entirely. These strategies should be explored in full when allocating and designing development.
- 4.1.4 It is possible to present the scores identified in Table 3.1 with 'mitigation-on', in other words, having applied mitigation. The results would be caveated since only the NDP Group can confirm that the mitigation will be possible and successfully applied; the SEA team do not have this information at the time of writing.
- 4.1.5 **Box 4.1** therefore presents information that the NDP Group may factor into their decision making as they now choose which sites which will form the preferred development sites for the plan.

Box 4.1: Mitigation Recommendations

Cultural Heritage

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 England²³. Historic England have also produced specific advice on rural planning²⁴ and guidance on the management of Conservation Areas²⁵.

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 locally important native tree and hedge species which retain year-round foliage. Guidelines for species selection and conditions for screening foliage are provided by the Royal Horticultural Society²⁶.

Historic England²⁷ recommend a number of mitigation measures which include:

- Preparation of detailed historic environment policy guidance;
- Undertaking detailed historic characterisation studies to inform development; and
- Preparation of management plans for heritage assets.

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

Useful resources include:

- Historic England (2014) Conservation Bulletin 72: Housing. Available at: <https://historicengland.org.uk/images-books/publications/conservation-bulletin-72/>
- Historic England (2016) Sustainability Appraisal and Strategic Environmental Assessment: Advice Note 8. Available at: <https://content.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/heag036-sustainability-appraisal-strategic-environmental-assessment.pdf/>
- Historic England (2018) Rural Heritage. Available at: <https://historicengland.org.uk/advice/caring-for-heritage/rural-heritage/>

²³ 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/>

²⁴ Available at: <https://historicengland.org.uk/advice/planning/rural-planning/>

²⁵ Available at: <https://historicengland.org.uk/advice/planning/conservation-areas/>

²⁶ Royal Horticultural Society (2017) Plants for Screening. Available at: <https://www.rhs.org.uk/advice/profile?PID=636>

²⁷ Historic England (2016) Sustainability Appraisal and Strategic Environmental Assessment: Advice Note 8. Available at: <https://content.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/heag036-sustainability-appraisal-strategic-environmental-assessment.pdf/>

Landscape

As Ilmington is partially within the Cotswolds AONB, development proposals should be carefully considered and planned in terms of scale, nature and design. The Position Statement on 'Development in the setting of the Cotswolds AONB' lists examples of adverse impacts in the setting of the AONB as well as ways to conserve and enhance. Development proposals in Ilmington, either those within the AONB or not, should consider these suggestions and adhere to policies set out in the Cotswolds Management Plan 2018 - 2023.

The Landscape Institute has produced a Neighbourhood Planning Technical Information Note²⁸, which states how additional landscape studies, carried out by a landscape professional, to provide an evidence base for planning policy documents. Studies may include landscape or townscape character assessments, landscape sensitivity and capacity assessment, green infrastructure studies or conservation area appraisals.

Useful resources include:

- Building for Life Partnership (2012) Building for Life 12: The sign of a good place to live. Available at: <https://www.designcouncil.org.uk/resources/guide/building-life-12-third-edition>
- Campaign to Protect Rural England (2017) What's Special to You: Landscape Issues in your Neighbourhoods Plan. Available at: <https://www.cpre.org.uk/resources/countryside/landscapes/item/4626-what-s-special-to-you-landscape-issues-in-your-neighbourhood-plan>
- Cotswolds Conservation Board (2010) Development in the setting of the Cotswolds AONB. Available at: <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/08/setting-position-statement-2016-adopted-with-minor-changes-30616-1.pdf>
- Cotswolds Conservation Board (2018) Cotswolds AONB Management Plan. Available at: <https://www.cotswoldsaonb.org.uk/planning/cotswolds-aonb-management-plan/>

Water and Flood Risk

The permeability of soil reduces as compaction increases. It is therefore recommended that construction workers adopt best practice measures to avoid the compaction of soils and exacerbating surface water flood risk during construction.

Opportunities to incorporate Sustainable Urban Drainage Systems (SuDS) into future development should be sought in order to increase natural infiltration rates, reduce surface water run-off, reduce flood risk and improve water quality. SuDS should be incorporated with green infrastructure where possible.

²⁸ Available at: https://www.landscapeinstitute.org/wp-content/uploads/2016/09/NeighbourhoodplanningTIN04_16.pdf [Date Accessed: 18/10/18]

DEFRA have produced a Surface Water Management Plan Technical Note²⁹, which aims to provide the most suitable solutions to surface water flooding problems. The guidance helps NDP groups understand and lead local flood risk management activities.

Useful resources include:

- DEFRA (2009) Construction Code of Practice for the Sustainable Use of Soils on Construction Sites. Available at: <https://www.gov.uk/government/publications/code-of-practice-for-the-sustainable-use-of-soils-on-construction-sites>
- WWF (2018) Saving the Earth: A Sustainable Future for Soils and Water. Available at: https://www.wwf.org.uk/sites/default/files/2018-04/WWF_Saving_The_Earth_Report_HiRes_DPS_0.pdf

²⁹ Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69342/pb13546-swmp-guidance-100319.pdf

5 Conclusion

5.1.1 This report has assessed the reasonable alternative sites in Ilmington Parish as identified in the Call for Sites report. A total of 25 sites were assessed. All sites were assessed against the SEA Framework presented in the Ilmington NDP Scoping Report³⁰ which focused on cultural heritage, landscape and water and flooding issues within the Parish.

5.1.2 Appraisals of the reasonable alternatives identified major and minor negative impacts on all three of the SEA Objectives.

5.1.3 Mitigation considerations have been provided in **Chapter 4**. These should help provide a sense of the potential extent to which negative effects may be mitigated, or detail of site options enhanced, so as to improve environmental performance. This is important for decision makers to be aware of and consider.

5.2 Next steps

5.2.1 The NDP Group now need to select and reject those sites that they believe are the best fit for their plan. They need to provide the SEA team with a list of all sites to be selected and those which are to be rejected and supply the reasons for doing so.

5.2.2 Upon receipt of this information, the environmental report can be prepared. The environmental report will consider detailed mitigation options and in-combination effects of the preferred options. The environmental report must then be the subject of consultation alongside the draft plan, once the draft plan has been finalised for consultation.

³⁰ Lepus Consulting (2018) Strategic Environmental Assessment of the Ilmington Neighbourhood Development Plan: Scoping Report.

Appendix A: Full SEA Framework

SEA Objective	Decision making criteria	Indicators
1 Cultural heritage: Protect, enhance and manage heritage assets, including designated and non-designated, as well as features and areas of archaeological, historical and heritage importance.	Will it preserve buildings of historic interest and, where necessary, encourage their conservation?	<ul style="list-style-type: none"> • Number of Listed Buildings at risk; • Number of Scheduled Monuments at risk; • Quantity of development proposals informed by archaeological provisions; • Annual number of visitors to historic attractions; • Quantity of development within the Ilmington Conservation Area; • Key features of the prehistoric settlement at Ilmington harmed or rescued.
	Will it preserve or enhance archaeological sites?	
	Will it improve the local accessibility, understanding or enjoyment of the historic environment?	
	Will it preserve or enhance the setting or character of cultural heritage assets or areas?	
2 Landscape: Protect, enhance and manage the character, appearance and distinctiveness of the landscape including their key features and special qualities.	Will it safeguard and enhance the local landscape character and distinctiveness?	<ul style="list-style-type: none"> • Quantity and quality of development on the edge of settlements; • Quantity of development within, adjacent to or viewable from the Cotswolds AONB; • Tranquillity assessments; • Landscape and visual impacts assessments; • Key features of the Wolds LCA threatened or harmed.
	Will it impact on landscape tranquility due to pollution?	
	Will it diminish or harm key features of the Cotswolds LCA?	
	Will it alter distinctive or long distance views for sensitive receptors?	
	Will it accord with principles and policies of the Cotswold AONB Management Plan?	
3 Water and flooding: Reduce the number of people at risk of flooding whilst protecting and enhancing water quality.	Will it reduce the number of people at risk of flooding?	<ul style="list-style-type: none"> • Proportion of watercourses in good or very good ecological and chemical status; • Number of pollution events; • Amount of development occurring in flood risk zones; • Flood risk mitigation measures in proposals; • Number of properties and residents at risk of surface water flooding; • Planning permissions granted contrary to Environment Agency advice.
	Will it protect or improve the ecological or chemical status of waterbodies?	
	Will it alter flood risk?	
	Will it alter the risk of pollution or contamination of any waterbody?	

Habitat Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

Habitat and Ecology Surveys



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Appendix B – SEA Framework

SEA Objective	Decision making criteria	Indicators
<p>Cultural heritage: Protect, enhance and manage heritage assets, including designated and non-designated, as well as features and areas of archaeological, historical and heritage importance.</p>	<p>Will it preserve buildings of historic interest and, where necessary, encourage their conservation?</p> <p>Will it preserve or enhance archaeological sites?</p> <p>Will it improve the local accessibility, understanding or enjoyment of the historic environment?</p> <p>Will it preserve or enhance the setting or character of cultural heritage assets or areas?</p>	<ul style="list-style-type: none"> • Number of Listed Buildings at risk; • Number of Scheduled Monuments at risk; • Quantity of development proposals informed by archaeological provisions; • Annual number of visitors to historic attractions; • Quantity of development within the Ilmington Conservation Area; • Key features of the prehistoric settlement at Ilmington harmed or rescued.
<p>Landscape: Protect, enhance and manage the character, appearance and distinctiveness of the landscape including their key features and special qualities.</p>	<p>Will it safeguard and enhance the local landscape character and distinctiveness?</p> <p>Will it impact on landscape tranquility due to pollution?</p> <p>Will it diminish or harm key features of the Wolds LCA?</p> <p>Will it alter distinctive or long distance views for sensitive receptors?</p> <p>Will it accord with principles and policies of the Cotswold AONB Management Plan?</p>	<ul style="list-style-type: none"> • Quantity and quality of development on the edge of settlements; • Quantity of development within, adjacent to or viewable from the Cotswolds AONB; • Tranquillity assessments; • Landscape and visual impacts assessments; • Key features of the Wolds LCA threatened or harmed.
<p>Water and flooding: Reduce the number of people at risk of flooding whilst protecting and enhancing water quality.</p>	<p>Will it reduce the number of people at risk of flooding?</p> <p>Will it protect or improve the ecological or chemical status of waterbodies?</p> <p>Will it alter flood risk?</p> <p>Will it alter the risk of pollution or contamination of any waterbody?</p>	<ul style="list-style-type: none"> • Proportion of watercourses in good or very good ecological and chemical status; • Number of pollution events; • Amount of development occurring in flood risk zones; • Flood risk mitigation measures in proposals; • Number of properties and residents at risk of surface water flooding; • Planning permissions granted contrary to Environment Agency advice.

Ecological Services

Green Infrastructure

Landscape and Visual Impact Assessment

Landscape Character Assessment

Habitats Regulations Assessment

Strategic Environmental Assessment

Sustainability Appraisal



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