

Strategic Environmental Assessment of the Ilmington Neighbourhood Development Plan

Assessment of Reasonable Alternatives

November 2018



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

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Client comments can be sent to Lepus using the following address.

1 Bath Street,

Cheltenham

Gloucestershire

GL50 1YE

Telephone: 01242 525222

E-mail: enquiries@lepusconsulting.com

www.lepusconsulting.com

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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 --	<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.

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 As part of an early stage in the assessment of reasonable alternatives, a worst-case scenario assessment of the reasonable alternatives was prepared and discussed with the client team. Following clarifications from the client team, the reasonable alternatives assessment has been revisited in this report. 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]

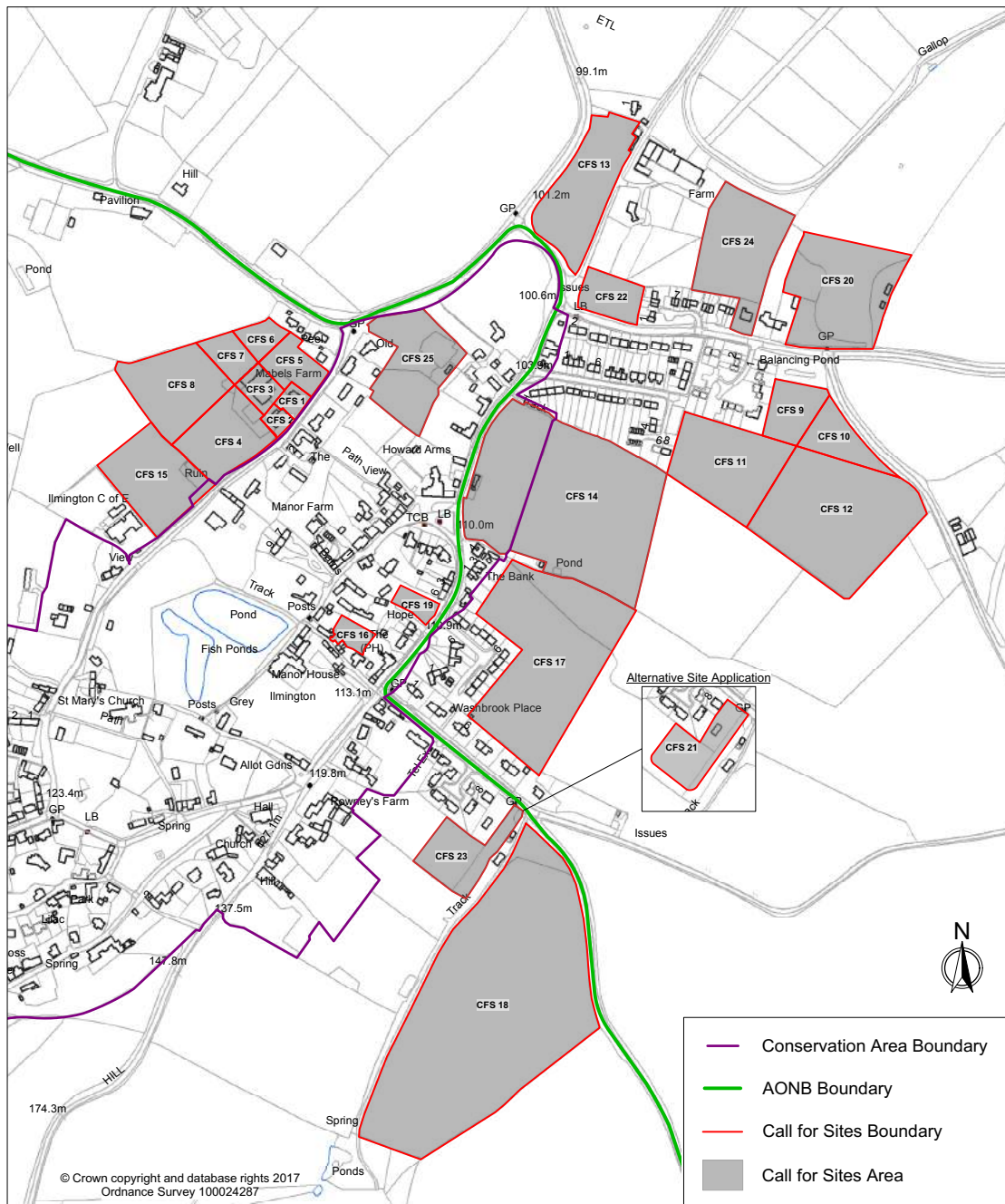


Figure 3.1: Call for Sites map²⁰.

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 locations and development would not be expect 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
<p>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.</p>	
--	Landscape
<p>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.</p>	
0	Water and flooding
<p>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.</p>	

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
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?	
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?	
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



LEPUS CONSULTING
LANDSCAPE, ECOLOGY, PLANNING & URBAN SUSTAINABILITY

© Lepus Consulting Ltd

1 Bath Street

Cheltenham

GL50 1YE

T: 01242 525222

E: enquiries@lepusconsulting.com

www.lepusconsulting.com

CHELTENHAM



Lepus Consulting
1 Bath Street
Cheltenham
Gloucestershire GL50 1YE

t: 01242 525222
w: www.lepusconsulting.com
e: enquiries@lepusconsulting.com