

# Strategic Environmental Assessment of the Ilmington Neighbourhood Development Plan

## SEA Scoping Document

October 2018



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



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## SEA Scoping Document

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Photo: Little river in the Cotswolds by Chen Zhao

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# Acronyms

AONB	Area of Outstanding Natural Beauty
CAMS	Catchment Area Management Strategies
EA	Environment Agency
EIA	Environmental Impact Assessment
EU	European Union
GI	Green Infrastructure
HRA	Habitats Regulations Assessment
IRZ	Impact Risk Zone
LCA	Landscape Character Area
MHCLG	Ministry for Housing, Communities and Local Government
NCA	National Character Area
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
RBMP	River Basin Management Plan
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SEO	Statement of Environmental Opportunities
SPZ	Source Protection Zone
SSSI	Site of Special Scientific Interest
STW	Severn Trent Water
SuDS	Sustainable Drainage System
WRMP	Water Resource Management Plan

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# 1 Introduction

## 1.1 This report

1.1.1 The Ilmington Neighbourhood Development Plan (NDP) is being prepared by Ilmington Parish Council. A Strategic Environmental Assessment (SEA) is being undertaken by Lepus Consulting (Lepus) to inform the NDP-making process. The purpose of this report is to identify the scope and level of detail of information that is necessary to inform the SEA.

## 1.2 Strategic Environmental Assessment

1.2.1 EU Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (SEA Directive) is transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations). Detailed guidance of these regulations can be found in the Government publication '*A Practical Guide to the Strategic Environmental Assessment Directive*' (ODPM, 2005) and Paragraph 009 of the Planning Practice Guidance (PPG) 'Neighbourhood Planning' section.

1.2.2 An SEA Screening Report was prepared by Lepus in April 2018. The screening report recommended that the Ilmington NDP should be screened in for full SEA. Following consultation on this report, the conclusion that SEA was required was agreed on with the three statutory bodies Historic England, the Environment Agency (EA) and Natural England as well as the local planning authority Stratford-on-Avon District Council.

1.2.3 SEA seeks to ensure that environmental considerations are part of the process of preparing certain plans and programmes. The objective of the Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with the Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment.

- 1.2.4 Regulation 12 (5) of the Environmental Assessment of Plans and Programmes Regulations 2004 (SI 1633) states that:

*“When deciding on the scope and level of detail of the information that must be included in the report the responsible authority shall consult the consultation bodies.”*

- 1.2.5 This report will identify the appropriate scope for the SEA of the Ilmington NDP. This report will then be consulted on with at least the three statutory bodies.

### 1.3 Ilmington Parish

- 1.3.1 Ilmington is a 1,343ha rural parish in the Stratford-on-Avon district of Warwickshire which had a population of 740 in 2016<sup>1</sup>. The Parish sits 12km south of Stratford-upon-Avon, 25km west of Banbury and is rightly recognised as the ‘gateway to the Cotswolds’ due to its location in the northern tip of the Cotswold Area of Outstanding Natural Beauty (AONB).

- 1.3.2 Local residents enjoy a strong sense of place with a distinctive rural character and long distance views of rolling hills and countryside. The village of Ilmington is the main settlement within the Parish and has been designated as a core area of historic high sensitivity by Stratford-on-Avon District Council. Ilmington village, which is mostly within or viewable from the AONB, is also the highest village in Warwickshire and sits at the foot of the Ilmington Downs. The Church of England parish Church of St Mary the Virgin is a Grade I Listed Building of Norman heritage that dates back to the middle of the 12<sup>th</sup> century.

- 1.3.3 Ilmington is a Category 3 Local Service Village as stated in the Core Strategy 2011-2031<sup>2</sup> and the strategic allocation for Category 3 Village would be for approximately 450 homes in total, of which no more than around 13% should be provided in any individual settlement. The exact number of dwellings proposed within the Plan area will depend on the availability of suitable sites and constraints of the Neighbourhood Area. The significant majority of the existing built form in Ilmington Parish (i.e. buildings and infrastructure) is within the village.

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<sup>1</sup> Office for National Statistics: Population estimates for UK, England, Wales, Scotland and Northern Ireland: mid 2016 published June 2017.

<sup>2</sup> Stratford-on-Avon District Council (2016) Core Strategy 2011-2031 <https://www.stratford.gov.uk/planning-regeneration/core-strategy.cfm?frmAlias=/corestrategy/>

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- ## 1.4 The Ilmington Neighbourhood Development Plan
- 1.4.1 The creation of neighbourhood development plans started with the Government's Localism Act 2011. One of the Localism Act's key components is the NDP; a new tier in planning policy which enables local people to shape the development of the community in which they live.
- 1.4.2 The Ilmington Neighbourhood Development Plan has been developed on behalf of Ilmington Parish Council by local volunteers within the Neighbourhood Plan Steering Group. Evidence gathering and analysis between 2015 and 2017, including public meetings, consultation workshops and planning assessments, have led to the creation of policies and the existing documentation.
- 1.4.3 The NDP is 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 framework for planning in Stratford-on-Avon district. This important legal position means that it has to regard national planning policy and to be in 'general conformity' with the strategic planning policies set out in the Stratford-on-Avon Core Strategy 2011-2031.
- 1.4.4 Key stages in the NDP-making process, and their relationship to SEA, are presented in **Figure 1.1**.
- 1.4.5 The scoping stage (Stage B in **Figure 1.1**) identifies the scope and level of detail of information that is required to be included in the SEA during Stages C, D and E. This report sets out the context, objectives and approach to assessment; establishes the baseline; and identifies relevant environmental issues and objectives.
- 1.4.6 A scoping report is not required by law, but it is a useful way of presenting information in order to establish a proportionate and relevant SEA process that informs the NDP-making process effectively in a way in which the statutory bodies and the local authority agree.
- 1.4.7 This report will be consulted on with the three statutory bodies.

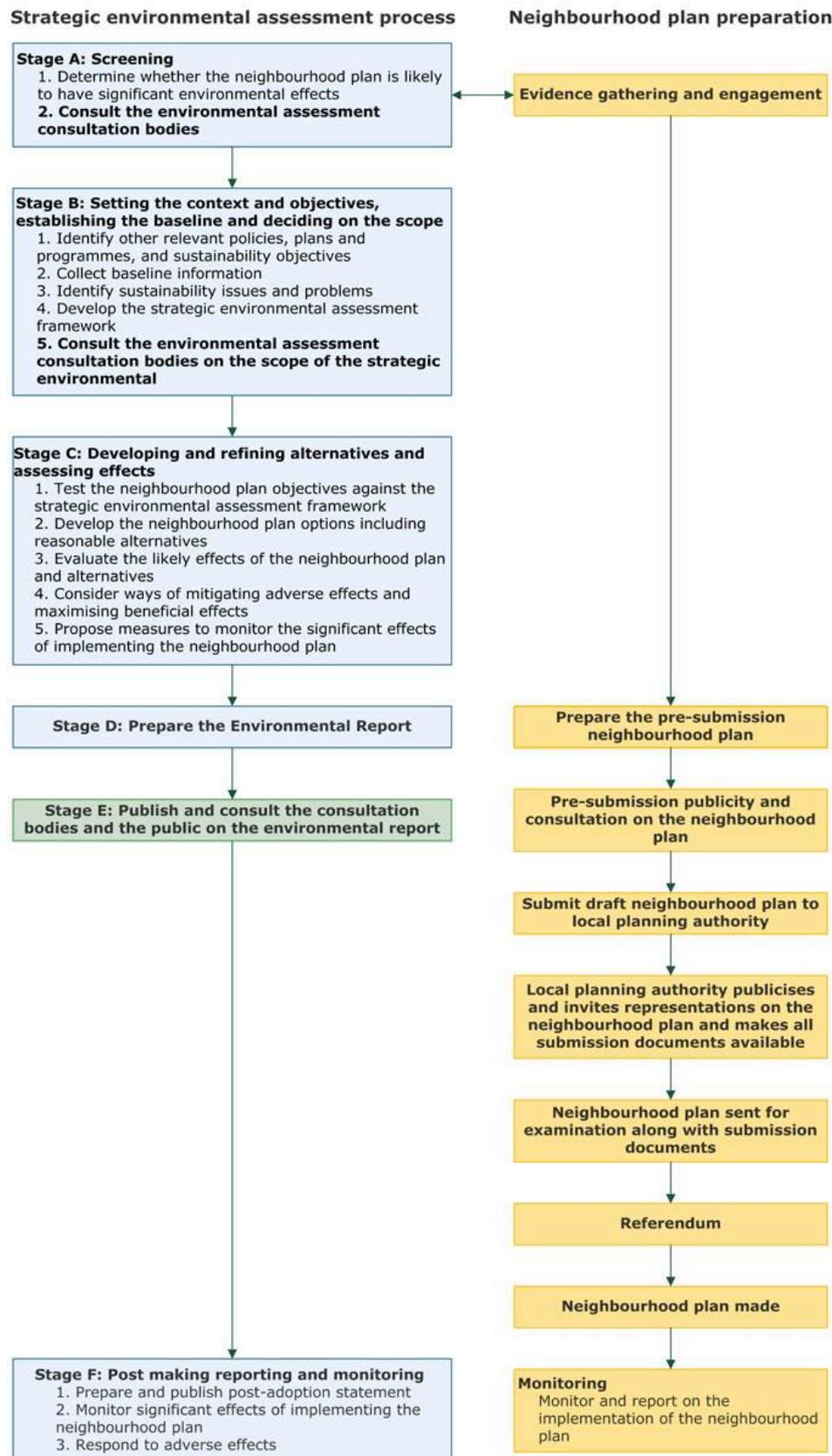


Figure 1.1: Strategic Environmental Assessment and NDP-making processes<sup>3</sup>

<sup>3</sup> MHCLG (2015) Flowchart: strategic environmental assessment process. Available at: <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#Strategic-environmental-assessment-process> [Date Accessed: 04/08/18]

## 2 Sustainability in Ilmington

### 2.1 SEA Screening outcome

2.1.1 The SEA Screening report prepared in April 2018 reviewed the extent to which the Ilmington NDP could potentially result in significant effects on the environment. Annex 1(f) of the SEA Directive states that the information provided in SEA should include:

*“the likely significant effects (1) on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.”*

2.1.2 The SEA Screening report considered the extent to which the NDP could potentially have a significant effect on each of the topics listed in Annex 1(f) of the SEA Directive. The Screening report concludes that a significant effect on the environment could not be ruled out due to two potential impact pathways:

1. **Landscape:** The Neighbourhood Area partially coincides with the Cotswolds AONB. The NDP currently allocates a total of 26 dwellings on three sites. Two of these sites, for which a total of 23 homes have been allocated, are within the AONB. The SEA screening report states that the construction and occupation of 23 new homes could potentially have a significant effect on the highly distinctive and sensitive character of the AONB;
2. **Cultural heritage:** The screening report states that as there are a range of heritage assets in the Neighbourhood Area, including several Listed Buildings, the impacts of the NDP on cultural heritage should be carefully considered.

2.1.3 In relation to each of the other topics listed in Annex 1(f), the SEA Screening report concluded that a significant effect would not arise as per the summaries presented in **Table 2.1**.

2.1.4 The Screening report was consulted on with the statutory bodies Natural England, the Environment Agency (EA) and Historic England. In their responses, each statutory body agreed with the findings and the conclusion of the SEA report. The EA also stated the following in their 18 July 2018 response (ref: UT/2007/101490/SE-24/SC1-L01):

*“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 environment, particularly through the discharge or treatment of foul effluent affecting water quality”.*

**Table 2.1:** Conclusions of the SEA Screening report in relation to each SEA topic

Annex 1(f) topic	SEA Screening conclusion on the potential impacts of the Ilmington NDP on this topic	Potential significant effect on caused by the Ilmington NDP?
Biodiversity, flora and fauna	Overall, it is anticipated the NDP will help protect and enhance biodiversity, flora and fauna in the Parish. A significant adverse impact is not considered likely.	No
Population and human health	Overall, it is anticipated that the policies led out in the NDP will improve the population and human health of Ilmington Parish.	No
Transport and accessibility	The NDP would be likely to have negligible impacts on transport and accessibility.	No
Soil, water and air	It is considered to be likely that there will be no adverse impacts on soil, air or water resources of the Parish as a result of the NDP. This is because of policies stated within the Development Criteria and Infrastructure Strategic Objectives.	Yes, potentially (as per the EA’s response to the Screening report)
Climatic factors	The NDP proposes a very limited quantity of development and will be likely to have a negligible impact on climate change	No
Material assets	No adverse effects were identified for this topic and the themes it deals with.	No
Cultural heritage	Overall an adverse impact on the cultural heritage objective cannot be ruled out.	Yes, potentially
Landscape	The NDP proposes 23 dwellings within the AONB and could therefore significant cumulative impacts on the landscape cannot be ruled out.	Yes, potentially

## 2.2 Proportionate scope for the Ilmington SEA

2.2.1 The SEA screening stage has determined that the Ilmington NDP could potentially have a significant effect on the environmental topics of landscape, cultural heritage and water and flooding but no other topic. It is therefore considered that an appropriate scope for the SEA of the Ilmington NDP would be a proportionate Environmental Report that focusses on the topics of landscape and cultural heritage as well as, in accordance with comments received from the EA in their response to the Screening report, the topic of water and flooding. **Table 2.2** provides an overview of the contents of these topics.

**Table 2.2:** Content of landscape, cultural heritage and water and flooding.

Annex 1(f) topic	Content
Landscape	Landscape designations including AONBs; Visual amenity; Landscape and townscape character; and Tranquillity.
Cultural heritage	Historic development of the parish; Designated and non-designated sites and areas; Setting of cultural heritage assets; Historic landscape character assessment; and Above and below ground archaeological assets.
Water and flooding	Fluvial flood risk; Surface water flood risk; Groundwater source protection; Water quality.

## 2.3 Policy, Plan and Programme Review

2.3.1 The plan may be influenced in various ways by other policies, plans or programmes (PPPs), or by external sustainability objectives such as those put forward in higher strategies or by legislation. The SEA process will take advantage of potential synergies between these PPPs and address any inconsistencies and constraints. A summary of the PPP review is presented in the following chapters under each sustainability theme. The PPP summaries should be read alongside the more detailed information included in **Appendix B**. A review of PPPs is provided for landscape, cultural heritage and water and flooding.

## 2.4 Baseline data collection

- 2.4.1 **Chapter 3 – Chapter 5** provide a review of the current baseline data for each of the topics listed in **Table 2.2**. The purpose of the baseline review is to help define the key sustainability issues for the plan as well as the likely evolution of each topic in the absence of the NDP. This will enable the predicted effects of the plan to be effectively appraised. The currency, resolution and presentation of data is crucial to an effective baseline. This is limited by the range of data available but seeks to focus on data at the level of the Ilmington plan area where possible whilst being up-to-date and fit for purpose. One of the purposes of consultation on the Scoping Report is to seek views on whether the data selected is appropriate.

## 3 Landscape

### 3.1 Summary of policy and plan review

- 3.1.1 At the EU, national, regional and local levels emphasis is placed on the protection of landscape as an essential component of people's surroundings and sense of place. The 2006 European Landscape Convention<sup>4</sup> acknowledges the quality and diversity of European landscapes, that they constitute a common resource and that it is important to co-operate towards its protection, management and planning.
- 3.1.2 Paragraph 8 of the NPPF<sup>5</sup> states *"Achieving sustainable development means ... to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy"*.
- 3.1.3 The PPPs seek to increase recognition of the linkages and interplay between the different aspects and roles of landscape, including: local distinctiveness; the historic environment; natural resources; farming, forestry and food; educational, leisure and recreation opportunities; transport and infrastructure; settlements and nature conservation.
- 3.1.4 Policies generally advocate the provision of open space, green networks and woodland as opportunities for sport and recreation, creating healthier communities, supporting and enhancing biodiversity, reducing temperatures in built up areas in summer, reducing the impact of noise and air pollution, and limiting the risk of flooding.

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<sup>4</sup> Council of Europe, European Landscape Convention, 2006, available online at: <https://rm.coe.int/1680080621>

<sup>5</sup> MHCLG (2018) NPPF

- 3.1.5 Ilmington partially coincides with the Cotswolds Area of Outstanding Natural Beauty (AONB), a nationally significant landscape designation managed by the Cotswold Conservation Board through their adopted Cotswolds AONB Management Plan 2013 – 2018 (see **Figure 3.1**). The Cotswold Conservation Board are in the process of preparing the Cotswold AONB Management Plan 2018 – 2023. The AONB Management Plan sets out a vision for future management of the area, together with clear objectives and policies, which will guide the Cotswolds Conservation Board in exercising its responsibilities. There is a strong emphasis on partnership working and the need for public bodies to fulfil their commitment to work towards helping to conserve and enhance the AONB. It covers a wide range of issues, including development and transport, rural land management, natural resources, biodiversity and the historic environment. With regards to Neighbourhood planning groups, Policy CE10 of the draft version of the 2018 – 2023 Management Plan states:

*“The purposes of conserving and enhancing the natural beauty of the Cotswolds AONB and increasing the understanding and enjoyment of the AONB’s special qualities should be identified as strategic priorities in Local Plans<sup>6</sup>, Neighbourhood Plans and other relevant plans and strategies. These plans and strategies should explicitly identify the Cotswolds AONB Management Plan as a material consideration.”*

- 3.1.6 The Ilmington NDP has been prepared with close regard to the current<sup>7</sup> and emerging<sup>8</sup> Cotswolds AONB Management Plans.

## 3.2 Baseline data

### National Character Areas

- 3.2.1 Based on a combination of landscape, biodiversity, geodiversity and economic activity England has been sub-divided into 159 National Character Areas (NCAs) that follow natural boundaries<sup>9</sup>.

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<sup>6</sup> This is in line with paragraph 172 of the NPPF.

<sup>7</sup> Cotswolds AONB Management Plan 2013 – 2018. Available at: <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/07/1.-Management-plan-13-18-Foreword.pdf>

<sup>8</sup> Cotswolds AONB Management Plan 2018 – 2023. Available at: <https://www.cotswoldsaonb.org.uk/wp-content/uploads/2018/01/7.-Agenda-Appendix-A-draft-2nd-Draft-MP.pdf>

<sup>9</sup> Natural England, National Character Areas, available online at: <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

3.2.2 Ilmington sits on the perimeter of the Cotswold NCA (nr. 107) and the Dunsmore and Feldon NCA (nr. 96). Each NCA profile includes a detailed description of the natural and cultural features shaping the NCA and the key drivers for change. The profiles of each NCA also suggest Statements of Environmental Opportunities (SEOs) that offer guidance on the critical issues and which would help to achieve sustainable growth and a more secure environmental future

3.2.3 The SEOs identified for the Cotswold NCA include:

- **SEO 1:** Protect and enhance the highly distinctive farmed landscape, retaining the balance between productive arable, pastoral and wooded elements and the open, expansive views particularly from the scarp, high wold and dip slope.
- **SEO 2:** Safeguard and conserve the historic environment, cultural heritage and geodiversity that illustrate the history, evolution, foundations, land use and settlement of the Cotswold's landscape, and allow access to and interpretation of the relationship between natural processes and human influences.
- **SEO 3:** Protect, maintain and expand the distinctive character of the Cotswolds and the network of semi-natural and arable habitats, including limestone grassland, beech woods and wetlands along streams and rivers, to enhance water quality, strengthen ecological and landscape connectivity, support rare species and allow for adaptation to changes in climate.
- **SEO 4:** Safeguard and manage soil and water resources, allowing naturally functioning hydrological processes to maintain water quality and supply; reduce flooding; and manage land to reduce soil erosion and water pollution and to retain and capture carbon.

3.2.4 The SEOs identified for the Dunsmore and Feldon NCA include:

- **SEO 1:** Protect and appropriately manage the historic character, settlement pattern and features of Dunsmore and Feldon, in particular its areas of archaeological and heritage interest, including the deserted settlements and ridge-and-furrow sites, ancient woodlands, veteran trees, farmsteads, country houses and landscaped parklands, and enhance the educational, access and recreational experience for urban and rural communities.
- **SEO 2:** Protect and appropriately manage Draycote Reservoir and the important network of natural and manmade rivers, streams, ponds, canals and other wetland habitats for their important role in water provision and water quality, for the species they support and for their contribution to recreation, sense of place and geodiversity.
- **SEO 3:** Protect and manage the mosaic of habitats including woodlands, hedgerows and heathlands, particularly ancient and semi-natural woodlands, together with sustainable management of agricultural land, and new planting

of woodland and heathland, where appropriate, to ensure continued provision of food, to extend the timber and biomass resource and to contribute to pollination, biodiversity and carbon storage, and for the benefits to soil and water management.

- **SEO 4:** Protect and manage the landscape character, high tranquillity levels and the historic settlement character to enhance sense of place and of history and to promote recreational opportunities; and ensure that new development is sensitively located and designed, integrate green infrastructure links into development, encourage new woodland planting to soften urban fringe developments and promote recreational assets such as the National Cycle Routes.

### Landscape Character Areas

3.2.5 Warwickshire County Council's Landscape Team pioneered the landscape character assessment process, which considered the unique and distinctive landscapes of Warwickshire. The project culminated in the production of Warwickshire landscapes guidelines which map and describe the special characteristics of the county's landscapes. This study<sup>10</sup> identified Ilmington as being within the Wold Landscape Character Area (LCA), an LCA that is characterized by features such as:

- Broad, rounded hills capped by oolitic limestone;
- Deep secluded river valleys and combes;
- Rich, red soils, supporting productive and arable farmland;
- A large scale geometric field pattern;
- A remote landscape of small nucleated stone villages and hamlets; and
- Steep hillsides with unimproved grassland.

3.2.6 The management strategy provided for the Wold LCA is to conserve the distinctive identity and remote rural character of the region. The overall guidelines provided for the LCA are to conserve the distinctive local character of Cotswold villages.

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<sup>10</sup> Warwickshire County Council Landscape Team, Landscape Character Assessment of Warwickshire, available online at: <https://www.warwickshire.gov.uk/landscapeguidelines>

## Landscape Sensitivity

- 3.2.7 The 2012 Special Landscape Areas Study<sup>11</sup> as well as the 2011 Landscape Sensitivity Assessment<sup>12</sup> for Stratford-on-Avon District Council identifies Ilmington Neighbourhood Area as being in a low sensitivity landscape. In this context, sensitivity is taken to mean the sensitivity of the landscape to change or development and is recognised as an interaction between the landscape itself, the way it is perceived and the nature of development proposals. A map of high sensitivity areas within Stratford-on-Avon has been provided in **Figure 3.2**.

## Cotswolds AONB

- 3.2.8 The parish of Ilmington partially coincides with the Cotswolds AONB (see **Figure 3.1**). The Cotswolds AONB Management Plan 2013 – 2018, a statutory plan prepared by the Cotswolds Conservation Board, aims to help deliver economic, health, biodiversity, green infrastructure (GI), climatic and tranquil benefits to the AONB.
- 3.2.9 The Cotswold AONB Management Plan 2018 – 2023 is being consulted on between 10<sup>th</sup> July – 14<sup>th</sup> August 2018 and is currently scheduled for adoption in Autumn 2018. Perhaps the most important and utilised component of the Management Plan is the policies, which serve five main purposes:
- They are principles for how the Cotswolds AONB should be managed<sup>13</sup> in order to:
    - conserve and enhance the natural beauty of the AONB;
    - increase the understanding and enjoyment of the AONB's special qualities;
    - address issues that are having an adverse effect on the AONB; and
    - achieve the vision and outcomes of the Management Plan.
  - They provide a framework for action by the Cotswolds Conservation Board and other stakeholders who have a role to play in the management of the AONB;
  - They represent the policies of the Board.;
  - They are intended to guide, influence and be used by stakeholders in their own plans, policies, proposals, work programmes and decision making; and

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<sup>11</sup> White Consultants (2012) Special Landscape Areas Study, Stratford-on-Avon District, Final Report for Stratford-on-Avon District Council, June 2012, available online at:  
<https://www.stratford.gov.uk/doc/205823/name/ED4112%20Special%20Landscape%20Areas%20Study%20June%202012.pdf>

<sup>12</sup> White Consultants (2011) Landscape Sensitivity Assessment, Stratford-on-Avon, Final Report for Stratford-on-Avon District Council, July 2011, available online at:  
<https://www.stratford.gov.uk/doc/205824/name/A%20Background%20Method%20and%20Summaries%20Landscape%20Sensitivity%20Study%20July%202011.pdf>

<sup>13</sup> In this respect, they serve a similar purpose – and should be used in a similar way – to Local Plan or Neighbourhood Plan policies.

- Together with other guidance produced by the Board, they are intended to facilitate a consistent approach across the whole of the Cotswolds AONB<sup>14</sup>.

3.2.10 Development proposed in the NDP which is situated in the AONB will be required to accord with the principles and policies in the Management Plan. This includes a requirement to not diminish the ability of the AONB to continue to successfully fulfil its main purposes, which are to conserve and enhance the natural beauty of the landscape, to meet the need for quiet enjoyment of the countryside and to have regard for the interests of those who live and work there.

3.2.11 The 2018 – 2023 Management Plan identifies three key issues for the Cotswold AONB:

- **Key Issue 1:** Erosion of the natural beauty of the Cotswolds AONB and its special qualities;
- **Key Issue 2:** Lack of a consistent approach across the whole of the Cotswolds AONB; and
- **Key Issue 3:** Lack of understanding of the benefits of AONB designation.

3.2.12 To tackle these Key Issues, the Conservation Board present four ambitions for the AONB:

- **Ambition 1:** Promotion of the Cotswolds as the Walking and Exploring Capital of England.
- **Ambition 2:** The local design and delivery of a Cotswolds package of agri-environment payments for public goods and services and rural development support.
- **Ambition 3:** Ensuring communities and businesses within and around the AONB identify and celebrate being part of a nationally recognised landscape.
- **Ambition 4:** To fully explore the case for and against the Cotswolds being designated as England's next National Park.

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<sup>14</sup> The Management Plan and guidance documents produced by the Cotswolds Conservation Board are the only publications that guide the management of the Cotswolds AONB as a whole. This is why the Board's guidance documents are specifically mentioned in several policies. This is not intended to undermine the importance of other plans and guidance that relate to specific parts of the AONB (i.e. individual local authorities).

## Visual impacts

- 3.2.13 Ilmington is a rural parish characterised by open space and countryside, with nearly all the existing built form within the built form boundary of the village of Ilmington. Currently, long distance countryside views are appreciated and enjoyed by highly sensitive receptors including local residents, users of the local PRoW network and those seeking recreational enjoyment in the AONB. Any new development in Ilmington could potentially alter these views and this potential impact should be afforded close consideration during the SEA.

### Box 3.1: Key landscape issues for the Ilmington NDP

1. The Parish partially coincides with the Cotswolds AONB. The rest of the Parish contributes to the setting of the AONB. Any development proposed within Ilmington that is also within the AONB should be in accordance with the policies, principles and ambitions of the Cotswold AONB Management Plan 2013 – 2018 as well as the emerging Cotswold AONB Management Plan 2018 – 2023. Development outside the AONB should seek to conserve and enhance its setting.
2. Development proposed within the NDP could potentially alter distinctive long distance and countryside views for highly sensitive receptors including local residents, users of the local PRoW network and those seeking recreational enjoyment in the AONB.
3. Findings from the 2012 Special Landscape Areas Study<sup>15</sup> as well as the 2011 Landscape Sensitivity Assessment<sup>16</sup> for Stratford-on-Avon District Council will also need to be considered.

### Box 3.2: Likely evolution of the landscape baseline without the NDP

1. 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 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.

<sup>15</sup> White Consultants (2012) Special Landscape Areas Study, Stratford-on-Avon District, Final Report for Stratford-on-Avon District Council, June 2012, available online at:  
<https://www.stratford.gov.uk/doc/205823/name/ED4112%20Special%20Landscape%20Areas%20Study%20June%202012.pdf>

<sup>16</sup> White Consultants (2011) Landscape Sensitivity Assessment, Stratford-on-Avon, Final Report for Stratford-on-Avon District Council, July 2011, available online at:  
<https://www.stratford.gov.uk/doc/205824/name/A%20Background%20Method%20and%20Summaries%20Landscape%20Sensitivity%20Study%20July%202011.pdf>

2. 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 - 2023.
3. In the absence of the NDP, it would be uncertain to the extent that 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 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.

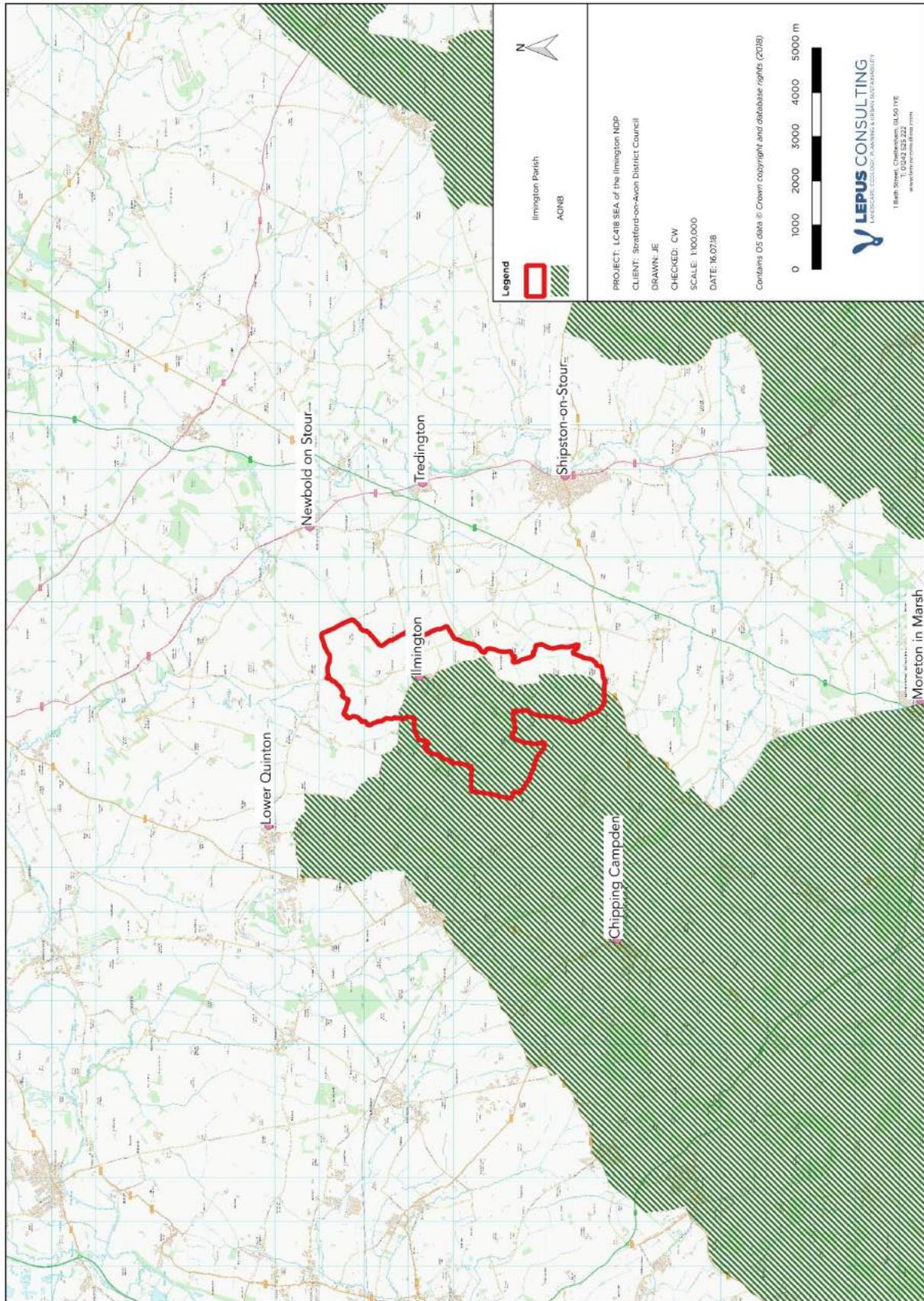


Figure 3.1: The Cotswolds AONB in relation to the Parish of Ilmington

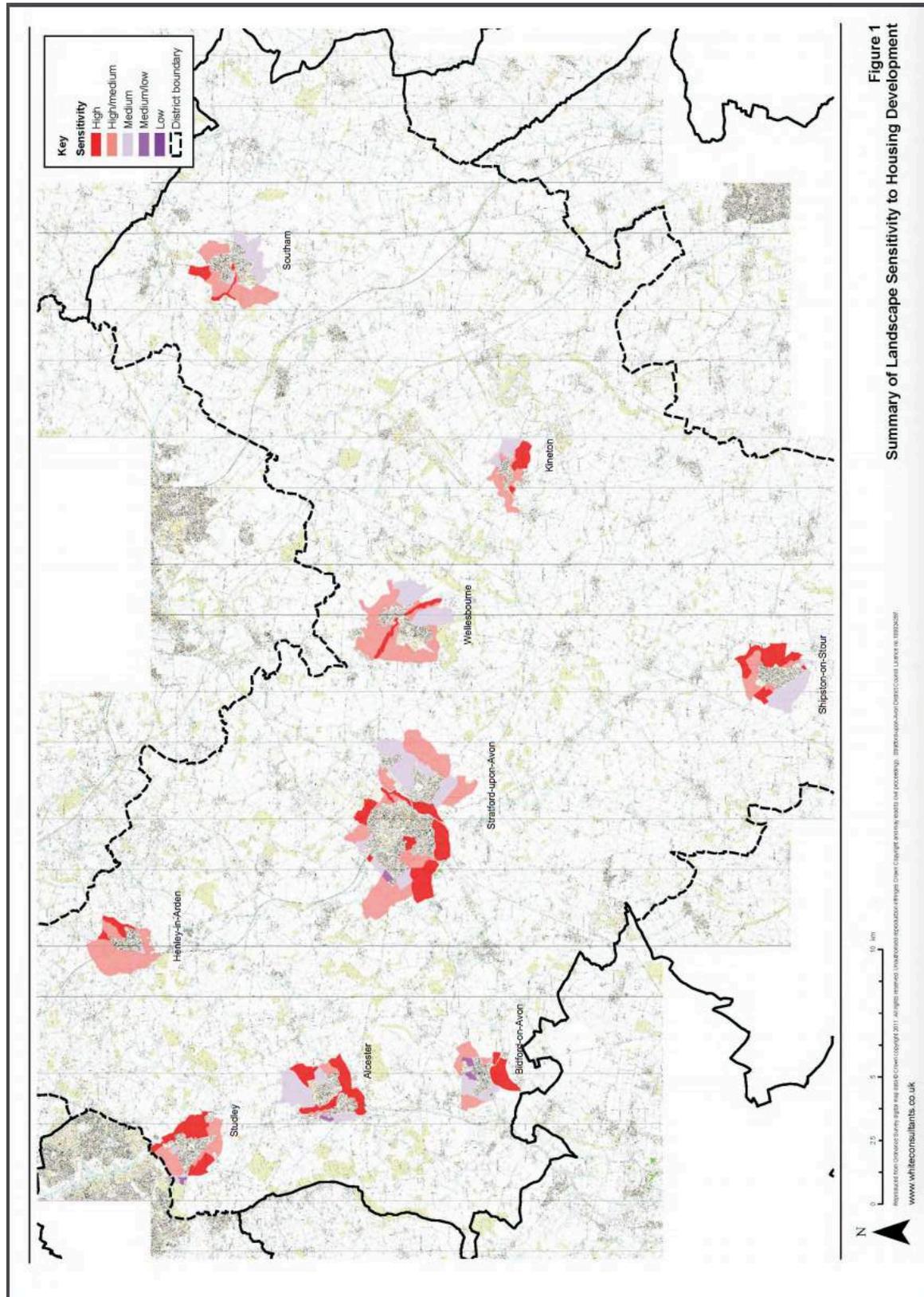


Figure 1  
Summary of Landscape Sensitivity to Housing Development

Figure 3.2: Summary of Landscape Sensitivity to Housing Development<sup>17</sup>

<sup>17</sup> White Consultants (2011) Landscape Sensitivity Assessment, Stratford-on-Avon, Final Report for Stratford-on-Avon District Council, July 2011, available online at: <https://www.stratford.gov.uk/doc/205824/name/A%20Background%20Method%20and%20Summaries%20Landscape%20Sensitivity%20Study%20July%202011.pdf>

## 4 Historic environment

### 4.1 Summary of policy and plan review

- 4.1.1 Historic environment priorities from the international to the local level seek to address a range of issues. These include protecting designated resources and their settings (such as Listed Buildings, conservation areas, Scheduled Monuments, and Registered Parks and Gardens); recognising the cultural aspects of landscape and establishing mechanisms for their protection against inappropriate development; recognising the potential value of unknown and undesignated resources; and conserving/enhancing sites and landscapes of archaeological and heritage interest so that they may be enjoyed by both present and future generations.
- 4.1.2 Regional guidance provides information on the way in which streets and public open spaces are managed in order to reinforce local character, creating a set of general principles for the continuing maintenance and enhancement of space. The local PPPs are in line with the regional, national and international PPPs, providing more specific guidance and information.
- 4.1.3 Relevant plans, policies and programmes include Ancient Monuments and Archaeological Areas Act 1979<sup>18</sup>, the Government's Statement on the Historic Environment for England 2010<sup>19</sup>, Heritage 2020: Strategic Priorities for England's Historic Environment 2015-2020<sup>20</sup>, Strategy for the Historic Environment: Heritage Counts<sup>21</sup> and Historic England Good Practice Advice in Planning Notes 1-3<sup>22</sup>.

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<sup>18</sup> UK Government (1979) Ancient Monuments and Archaeological Areas Act 1979, available online at: <http://www.legislation.gov.uk/ukpga/1979/46>

<sup>19</sup> UK Government (2010) Statement on the historic Environment for England 2010 - Parts 1,2 and 3, available online at: <https://www.gov.uk/government/publications/the-governments-statement-on-the-historic-environment-for-england>

<sup>20</sup> Heritage 2020 (2015) Strategic Priorities for England's Historic Environment 2015-2020, available online at: <http://www.theheritagealliance.org.uk/tha-website/wp-content/uploads/2014/11/Heritage-2020-framework.pdf>

<sup>21</sup> Historic England (2016) Heritage Counts, The Historic Environment, available online at: <https://content.historicengland.org.uk/content/heritage-counts/pub/2016/heritage-counts-sector-overview-2016.pdf>

<sup>22</sup> Historic England (2015) Good Practice Advice in Planning Notes 1-3, available online at: <https://historicengland.org.uk/images-books/publications/>

## 4.2 Baseline data

### Designated assets

4.2.1 Ilmington has an array of distinctive heritage assets and historic areas recognised through designations. This includes:

- Nationally designated Listed Buildings;
- Scheduled Monuments; and
- Ilmington Conservation Area.

### Listed Buildings

4.2.2 Listed buildings are those that have been placed on the Statutory List of Buildings of Special Architectural or Historic Interest. Within the Parish of Ilmington there are 56 Grade II Listed Buildings (see **Figure 4.1**), three Grade II\* Listed Buildings (see **Figure 4.2**) and one Grade I Listed Building (see **Figure 4.3**).

### Scheduled Monuments

4.2.3 A Scheduled Monument (SM) is a nationally important archaeological site or historic feature that is given protection under the Ancient Monuments and Archaeological Areas Act 1979. Within the Parish is the SM called 'Rectangular earthwork on Nebsworth' (see **Figure 4.4**). Adjacent to the Parish's eastern perimeter is an SM called 'Medieval settlement at Lark Stoke'.

### Conservation Area

4.2.4 Conservation areas are areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance. Local authorities have the power to designate conservation areas in any area of 'special architectural or historic interest' whose character or appearance is worth protecting or enhancing. This is judged against local and regional criteria rather than national importance. Conservation area designations increase the local planning authority's control over demolition of buildings and over certain alterations to residential properties that would normally be classed as 'permitted development' and not require planning permission. There is one Conservation Area in Ilmington that covers most of the existing built form in the Parish (see **Figure 4.5**).

## Historic Environment Records Data

4.2.5 The Warwickshire Historic Environment Record (WHER) indicates that there was prehistoric settlement activity in the vicinity of the village of Ilmington<sup>23</sup>:

- Prehistoric features were recorded at Ballard's Lane;
- A Palaeolithic hand-axe and two Iron Age quern stones have been found in the village;
- A Romano-British settlement is recorded to the northeast of the village;
- Romano-British ceramics have been in the village as well as to the west of the village;
- Earthworks associated with the shrunken village are recorded to the west of the village;
- A moat is recorded to the west of the manor house indicating the medieval origins of settlement in this area; and
- Areas of ridge and furrow are recorded to the south of the village; and
- There are several WHER records relating to the built heritage assets of 'Cross Hands to Halford Bridge' and 'Ilmington to Stratford turnpike road'.

## Historic Landscape Character

4.2.6 The Historic Landscape Character mapping provided in the 2012 Historic Environment Assessment<sup>24</sup> highlights a historically nucleated settlement activity with small modern farmsteads to the north, east and southeast as well as small paddocks, closes and irregular-shaped fields to the north and west of the village.

## Archaeological Sensitivity

4.2.7 An assessment of the archaeological sensitivity in Ilmington has identified<sup>25</sup> a single, large area of sensitivity that covers the main area of the medieval settlement and extends to cover earthworks to the south west of the village and the Romano-British settlement to the east (see **Figure 4.6**). The area of medium sensitivity is assigned to the area around the extent of the medieval and Roman-British settlements. The areas of ridge and furrow have been assigned a low – medium sensitivity. For the rest of the study area the sensitivity is given as low/uncertain as, based on an appraisal of readily available sources, no evidence was found for significant archaeological remains in these areas.

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<sup>23</sup> Historic Environment Assessment of Local Service Villages, Stratford-on-Avon District 2012

<sup>24</sup> Ibid

<sup>25</sup> Ibid

**Box 4.1:** Key historic environment issues for the Ilmington NDP

1. Development in the Parish could potentially alter the character of the local area or the setting of historic assets, both designated and non-designated, including the Grade I Listed 'Church of St Mary'.
2. Archaeological remains, including that which has not yet been discovered, are prevalent in the area and could potentially be affected by development proposals in the Parish.

**Box 4.2:** Likely evolution of the historic environment baseline without the NDP

1. 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 District Local Plan. It is uncertain the extent to which the accessibility, local awareness or setting of heritage assets may be enhanced over time.
2. In the absence of the NDP, it is unlikely that archaeological assets (both discovered and undiscovered) will be harmed or threatened.

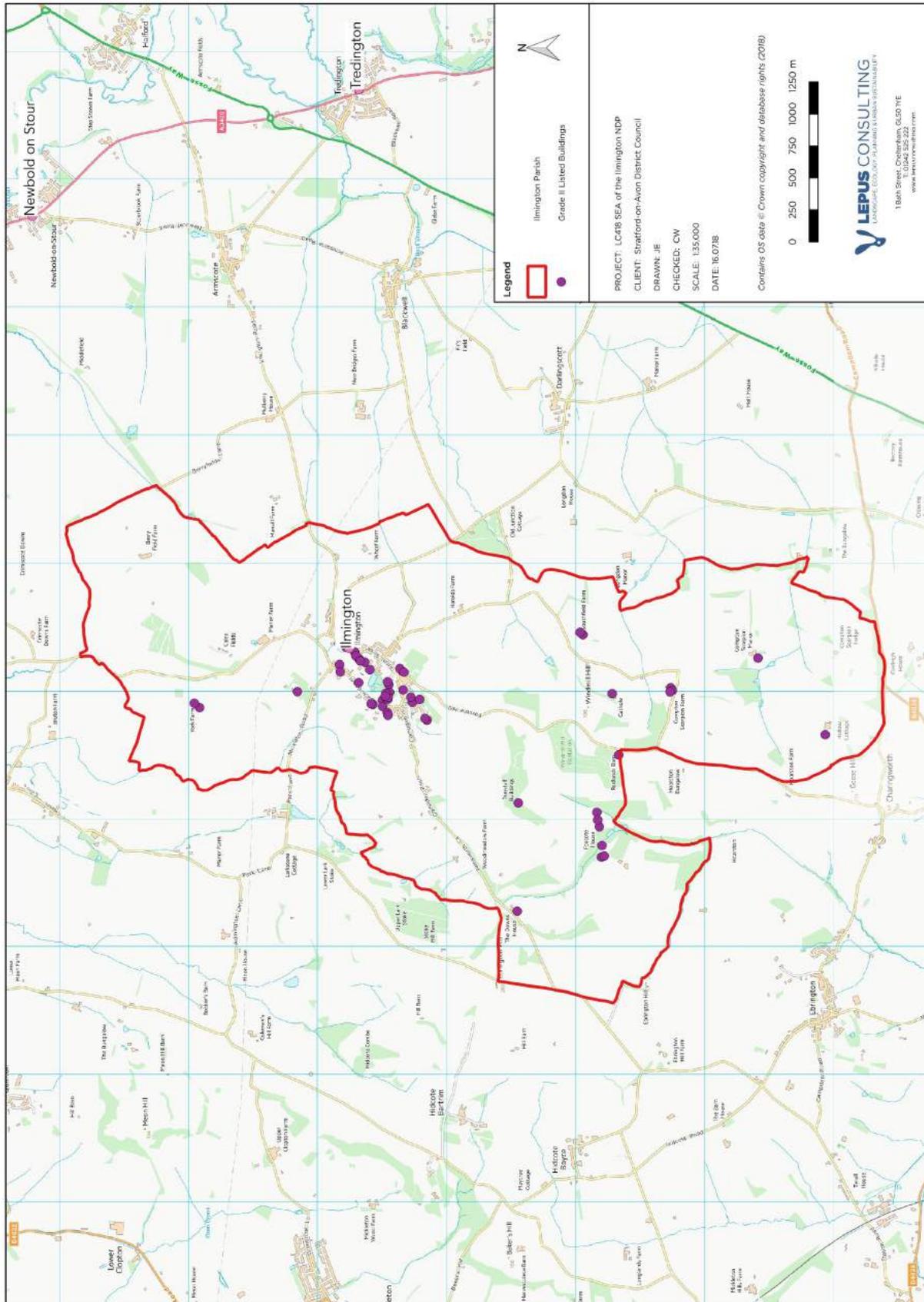


Figure 4.1: Grade II Listed Buildings in Ilmington

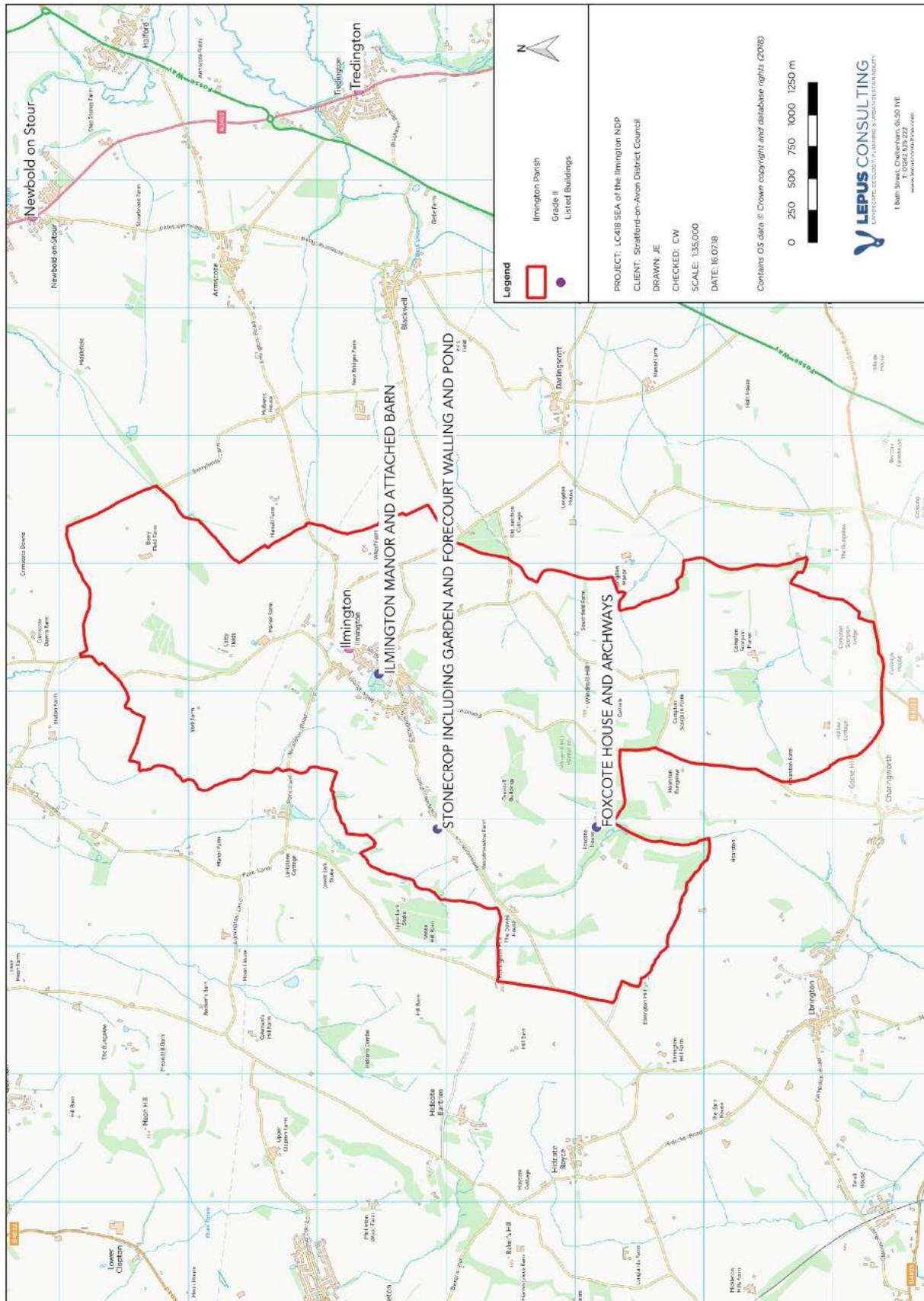


Figure 4.2: Grade II\* Listed Buildings in Ilmington

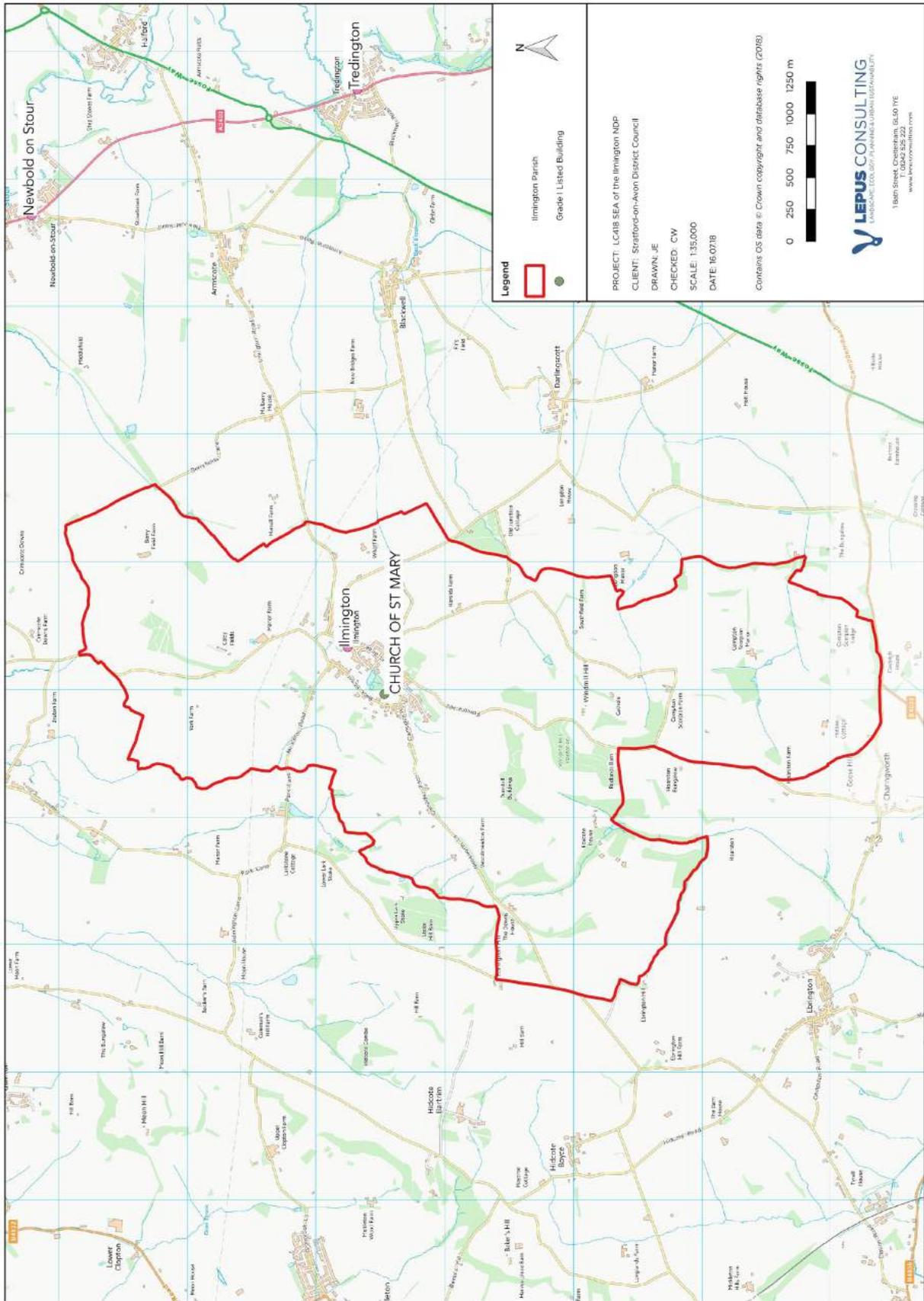


Figure 4.3: Grade I Listed Building 'Church of St Mary' in Ilmington

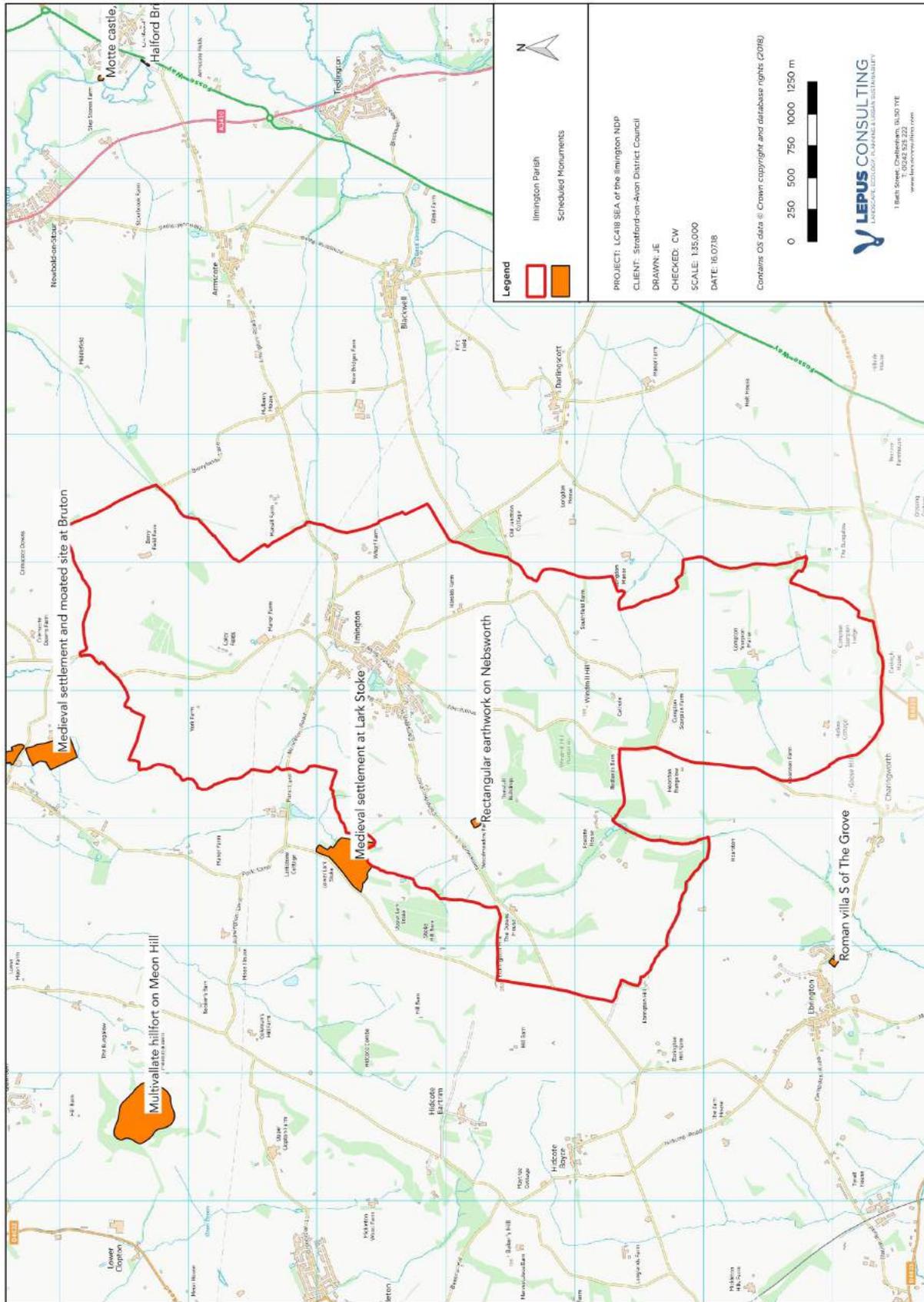
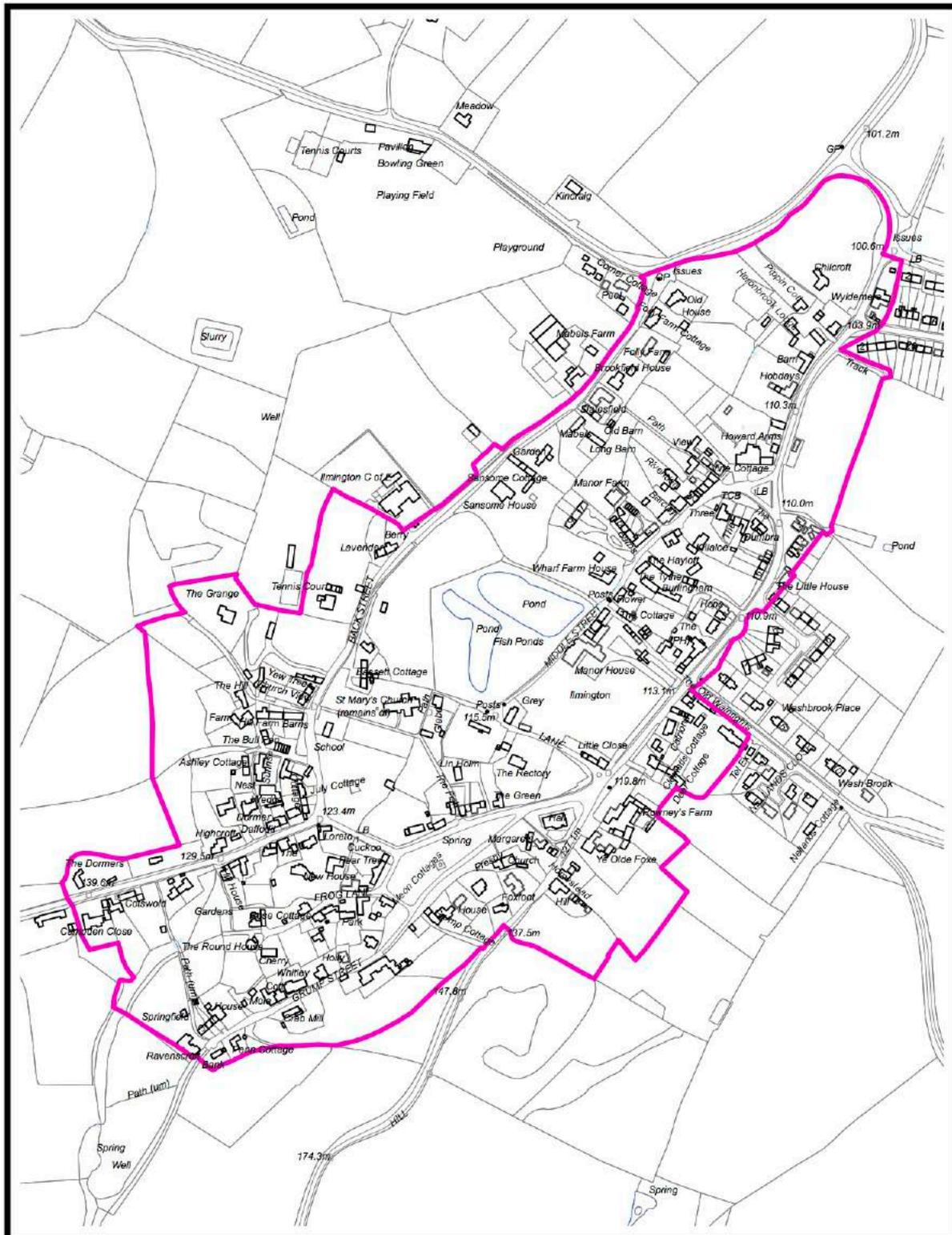


Figure 4.4: Scheduled Monuments in and around Ilmington



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### Ilmington Conservation Area



Figure 4.5: Ilmington Conservation Area<sup>26</sup>

<sup>26</sup> Stratford-on-Avon District Council, available online at:  
<https://www.stratford.gov.uk/doc/175123/name/Ilmington%20A4P.pdf/>

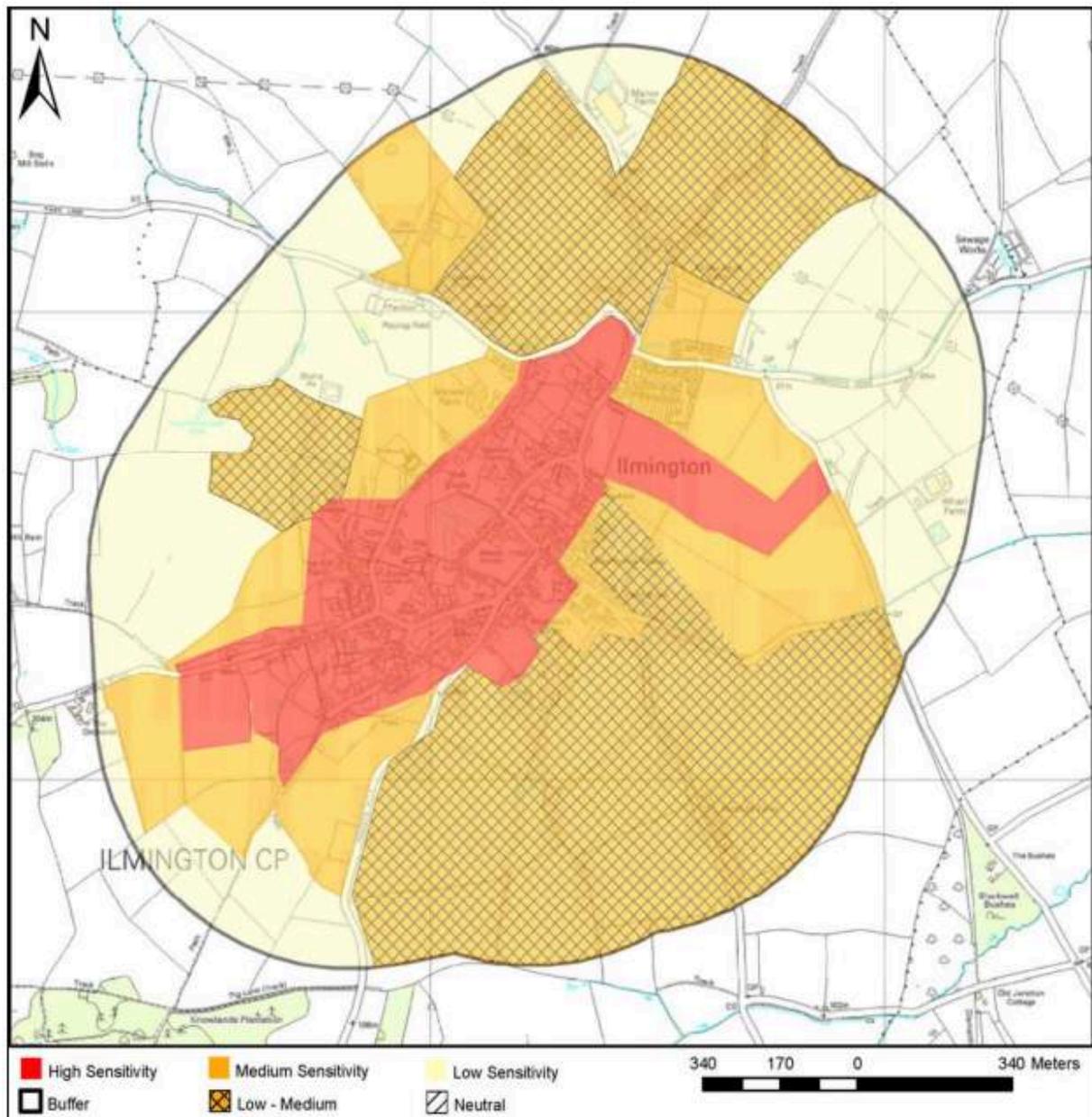


Figure 4.6: Archaeological sensitivity of Ilmington Parish<sup>27</sup>

<sup>27</sup> Historic Environment Assessment of Local Service Villages, Stratford-on-Avon District 2012

# 5 Water and flooding

## 5.1 Summary of policy and plan review

- 5.1.1 National water policies are primarily driven by the aims of the EU Water Framework Directive 2000/60/EC, as translated into national law by the Water Framework Regulations 2003. Key objectives include improving the quality of rivers and other water bodies to 'good ecological status'; considering flood risk at all stages of the plan and development process in order to reduce future damage to property and loss of life; and incorporating water efficiency measures into new developments. The Water Framework Directive also requires groundwater to reach 'good status' in terms of quality and quantity.
- 5.1.2 National and regional strategies also have a focus on maintaining and protecting the availability of water. Severn Trent Water's Water Resource Management Plan (WRMP) provides the means of enabling water to be supplied and treated in the area. Water supply and use is guided by EA's Catchment Abstraction Management Strategies (CAMS). The district is covered by the Warwickshire and Avon CAMS. Setting out how water quality can be improved, the River Basin Management Plan (RBMP) for the Severn river basin also has been prepared by the Environment Agency under the Water Framework Directive.
- 5.1.3 The National Planning Policy Framework (NPPF) seeks to ensure that flood risk is considered at all stages in the planning process to avoid inappropriate development in areas at risk of flooding, and to direct development away from areas of highest risk.

## 5.2 Baseline data

### Water Resources

- 5.2.1 Over most of the District, Severn Trent Water (STW) is responsible for water supply, the foul drainage network and wastewater treatment. A small part of the District (the south-eastern corner) is covered by Thames Water.
- 5.2.2 According to the Environment Agency, water resources are under 'moderate stress' in the area, with some areas under 'serious' stress. In this context there are current and predicted supply-demand deficits within the district.

- 5.2.3 Whilst the River Severn (including the River Avon) is the major source of water in the area, a number of major aquifers exist locally, including the Triassic Sherwood Sandstone Group. These sandstones are capable of supporting large abstractions and form important aquifers for water supply in these areas. Another major aquifer is in the Jurassic Great & Inferior Oolitic Limestone, which is based along the Cotswold scarp covering part of the south of the district. This limestone aquifer provides an important water resource for the area and supports a number of abstractions, mainly from spring sources<sup>28</sup>.
- 5.2.4 Catchment Area Management Strategies (CAMS) are six year strategies developed by the Environment Agency for managing water resources at the local level. CAMS will be produced for every river catchment area in England and Wales. Stratford-on-Avon is covered by the Warwickshire Avon CAMS.

### Water Quality

- 5.2.5 The parish of Ilmington is situated south east of the River Avon and west of the River Stour (see **Figure 5.1**). Several tributaries of the River Stour course through the Parish. The Warwickshire Avon catchment extends from the source of the River Avon near Coventry to its confluence with the River Severn near Tewkesbury. This largely rural catchment has a high value for wildlife that is also important for anglers and water sports. There are 78 surface and ground water bodies in the catchment, one of which is an artificial lake, nine of which are heavily modified and 68 of which are natural<sup>29</sup>. The EA provides data on the ecological and chemical quality of each surface waterbody (see **Table 5.1**).

**Table 5.1:** Ecological and chemical classification for surface waters in the Warwickshire Avon catchment for 2016

Number of waterbodies	Ecological status or potential					Chemical status	
	Bad	Poor	Moderate	Good	High	Fail	Good
78	2	21	54	1	0	2	76

<sup>28</sup> Environment Agency (2013) Warwickshire Avon abstraction licensing strategy. Available at: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/291400/LIT\\_2604\\_7a244e.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/291400/LIT_2604_7a244e.pdf)

<sup>29</sup> Environment Agency, Avon Warwickshire – Summary, Catchment Management, Available online at: <http://environment.data.gov.uk/catchment-planning/ManagementCatchment/3007/Summary>

- 5.2.6 The vulnerability of groundwater to pollution is determined by the physical, chemical and biological properties of the soil and rocks.
- 5.2.7 Groundwater Source Protection Zones (SPZs) indicate the risk to groundwater supplies from potentially polluting activities and accidental releases of pollutants. Designed to protect individual groundwater sources, these zones show the risk of contamination from any activities that might cause pollution in the area. In this context they are used to inform pollution prevention measures in areas which are at a higher risk, and to monitor the activities of potential polluting activities nearby.
- 5.2.8 There are no SPZs present in the Parish of Ilmington and development here is therefore unlikely to pose a threat to the quality of groundwater sources.

### Flood Risk

- 5.2.9 There are several types of flooding, including fluvial (river and coastal flooding) and pluvial (surface water flooding), as well as flooding from reservoirs. The EA provide data on flood risk in order to inform planning decisions.
- 5.2.10 Fluvial flood risk is characterised by three zones, such that:
- **Flood Zone 1:** land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%);
  - **Flood Zone 2:** land assessed as having between a 1 in 100 and 1 in 1,000 annual probability of river flooding (1% – 0.1%), or between a 1 in 200 and 1 in 1,000 annual probability of sea flooding (0.5% – 0.1%) in any year; and
  - **Flood Zone 3:** land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%), or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year.
- 5.2.11 Flood Zone 3 is further split into two zones, Flood Zone 3a and Flood Zone 3b, by the local planning authority. The Parish of Ilmington is in Flood Zone 1, apart from a narrow strip of land in the centre of the village that is Flood Zone 2 (see **Figure 5.3**).

5.2.12 Surface water flooding is different to fluvial flooding. It generally happens when rainwater does not drain away through the ground or normal drainage systems and instead lies on, or flows over, the ground. Flooding from surface water is difficult to predict as rainfall location and volume are difficult to forecast. In addition, local features can greatly affect the chance and severity of flooding. It often occurs due to the combination of intense periods of rainfall falling on impermeable surfaces such as concrete or hard and bare soils. Surface water flood risk is also divided into three categories by the EA, such that:

- **Low risk:** means that each year this area has a chance of flooding of between 0.1% and 1%;
- **Medium risk:** means that each year this area has a chance of flooding of between 1% and 3.3%; and
- **High risk:** means that each year this area has a chance of flooding of greater than 3.3%.

5.2.13 Surface water flood risk data is not available in GIS shape format but can be viewed online<sup>30</sup>. The Parish of Ilmington has several areas of land at Low, Medium and High risk of surface water flooding (see **Figure 5.2**).

#### Box 5.1: Key water and flooding issues for the Ilmington NDP

1. Development in the Parish could potentially increase the risk of contamination or pollution of surface water in the area, including tributaries of the River Stour.

#### Box 5.2: Likely evolution of water and flooding baseline without the NDP

1. In the absence of the NDP, it is considered to be likely that 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.
2. 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 will be likely to improve to some extent over the coming years in line with requirements of the Water Framework Directive.

<sup>30</sup> Long term flood risk data is viewable online at: <https://flood-warning-information.service.gov.uk/long-term-flood-risk/>

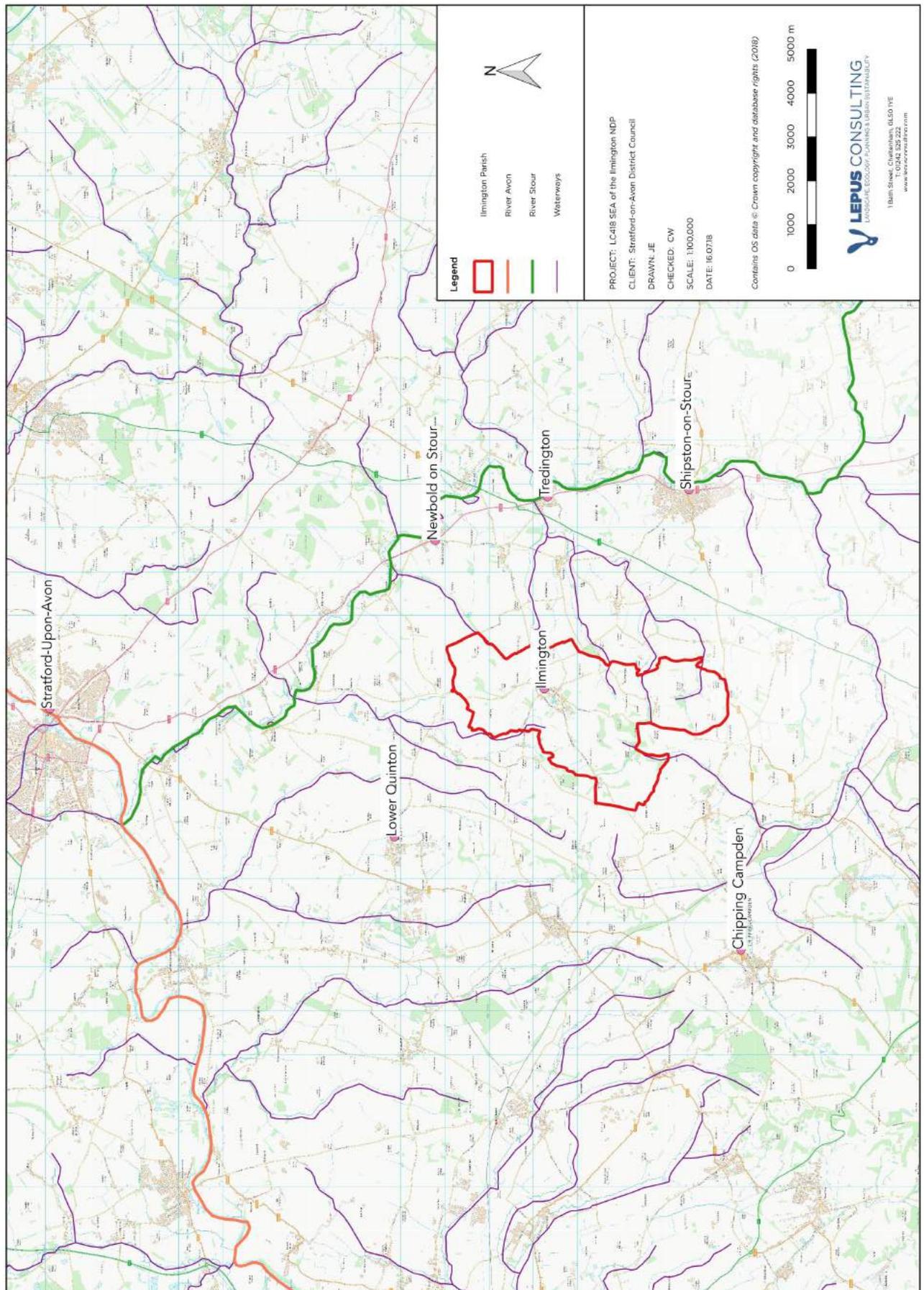


Figure 5.1: Ilmington in relation to the Rivers Stour and Avon as well as minor rivers



Figure 5.2: Surface water flood risk in Ilmington (EA data)

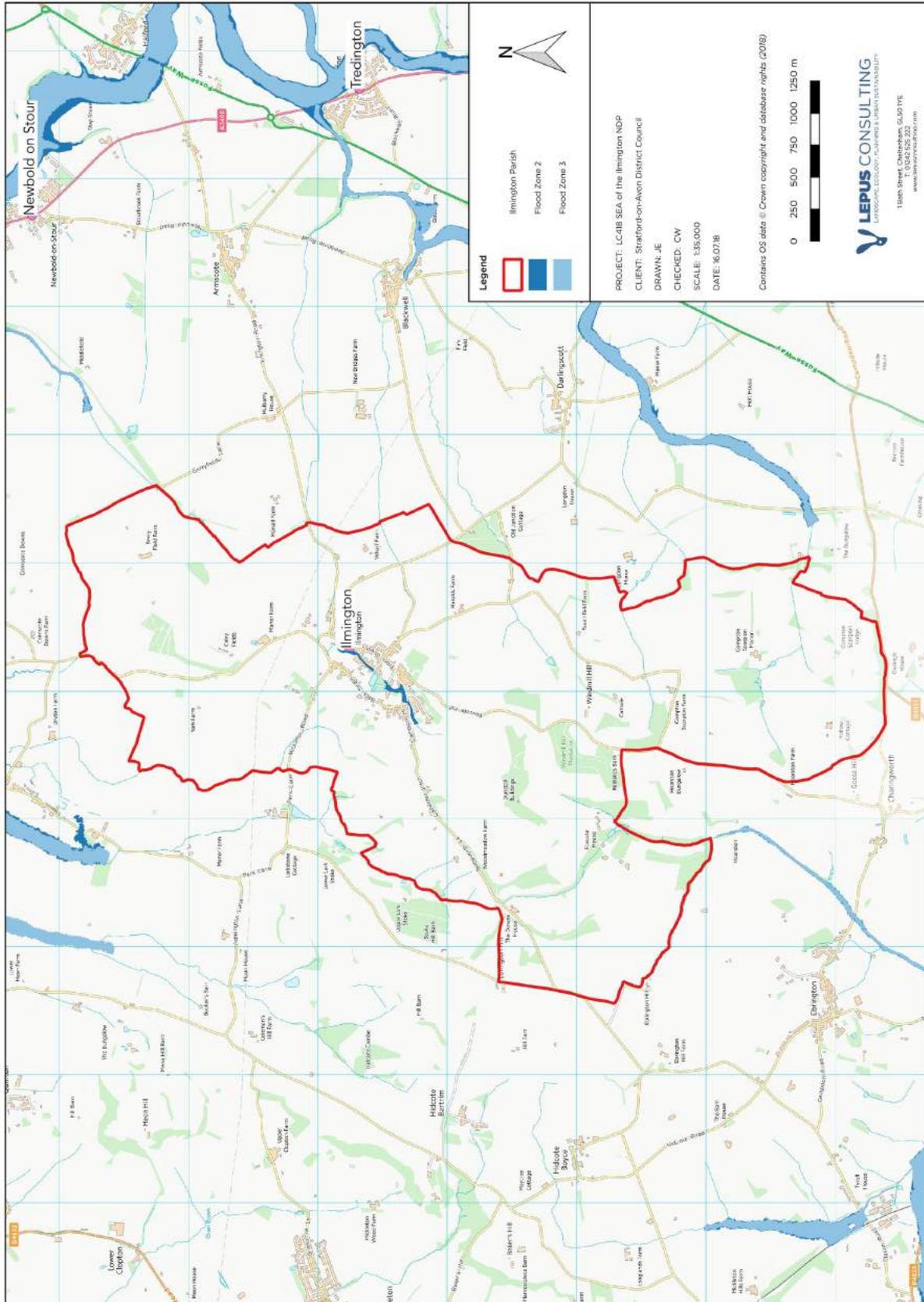


Figure 5.3: Fluvial Flood Zones 2 and 3 in relation to Ilmington (EA data)

## 6 SEA Framework

### 6.1 Purpose of the SEA Framework

6.1.1 The Ilmington NDP will be assessed against an SEA Framework. The SEA Framework provides a way in which sustainability effects can be described, analysed and compared and will be comprised of:

- SEA Objectives;
- Decision making criteria; and
- Indicators.

6.1.2 SEA Objectives are typically of a high level but at a detail appropriate to the plan being assessed. The extent to which proposals in the NDP (predominantly policies and site allocations) will help to achieve each SEA Objective (or have a 'positive impact' on each SEA Objective) will be determined by using decision making criteria and a set of indicators. The decision-making criteria and indicators can be revised and updated over time should the baseline data or the key sustainability issues in the Neighbourhood area change. The set of indicators in the Framework can also be used to monitor the success and sustainability performance of the NDP should it be adopted.

### 6.2 SEA Objectives

6.2.1 The purpose of the SEA objectives is to provide a way of ensuring the proposed NDP policies consider the needs of the Ilmington parish in terms of their environmental and socio-economic effects. The SEA topics identified in Annex I (f) of the SEA Directive are one of the key determinants when considering which SA Objectives should be used for the environmental criteria.

6.2.2 The SEA/SA Framework used by the local planning authority, which in this case is Stratford-on-Avon District Council, generally acts as a starting point for identifying suitable Objectives. However, the Objectives should be narrowed down to issues pertinent to the local area.

6.2.3

The range of SEA Objectives proposed in **Table 6.1** is designed in a way which facilitates a proportionate and focussed Environmental Report that deals solely with the topics for which there could potentially be an adverse effect caused by proposals in the NDP. It was determined and agreed during the SEA Screening that the NDP could not potentially have a significant effect on Annex I(f) topics other than landscape, cultural heritage and water. The SEA Framework draws on this fact, as well as the key issues identified for each of landscape, cultural heritage and water (see **Boxes 3.1, 4.1** and **5.1**). The proposed Framework is also presented in **Appendix A**.

**Table 6.1:** The proposed SEA Framework for the Ilmington SEA

SEA Objective	Decision making criteria	Indicators
<b>1</b> <b>Cultural heritage:</b> 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"> <li>• Number of Listed Buildings at risk;</li> <li>• Number of Scheduled Monuments at risk;</li> <li>• Quantity of development proposals informed by archaeological provisions;</li> <li>• Key prehistoric features of in Ilmington harmed or rescued</li> </ul>
	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 of cultural heritage assets?	
	Will it alter and/or enhance the character or distinctiveness of a Conservation Area?	
<b>2</b> <b>Landscape:</b> 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"> <li>• Quantity and quality of development on the edge of settlements;</li> <li>• Quantity and quality of development within, adjacent to or viewable from the Cotswolds AONB;</li> <li>• Tranquillity assessments;</li> <li>• Landscape and visual impacts assessments;</li> <li>• Key features of the Wolds LCA threatened or harmed.</li> </ul>
	Will it impact on landscape tranquillity, such as due to light or noise pollution?	
	Will it diminish or harm key features of the Wolds 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?	
<b>3</b> <b>Water and flooding:</b> 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"> <li>• Proportion of watercourses in good or very good ecological and chemical status;</li> <li>• Number of pollution events;</li> <li>• Amount of development occurring in flood risk zones;</li> <li>• Flood risk mitigation measures in proposals;</li> <li>• Number of properties and residents at risk of surface water flooding;</li> <li>• Planning permissions granted contrary to Environment Agency advice.</li> </ul>
	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?	

# 7 Next steps

## 7.1 Consultation on the Scoping Report

7.1.1 The SEA Regulations state that the scoping stage should be the subject of consultation with statutory bodies for a minimum period of five weeks.

7.1.2 Public involvement through consultation is a key element of the SEA process. The SEA Regulations require consultation with statutory consultation bodies but not full consultation with the public at the scoping stage. Regulation 12 (5) of the Environmental Assessment of Plans and Programmes Regulations 2004 (SI 1633) states that:

*“When deciding on the scope and level of detail of the information that must be included in the report the responsible authority shall consult the consultation bodies.”*

7.1.3 The statutory consultation bodies are Historic England, the Environment Agency and Natural England.

7.1.4 All comments received on the Scoping Report will be carefully reviewed and the report will be amended where appropriate. Once the Scoping Report has been finalised in light of the consultation responses, the SEA process can move onto the next stage (Stage C of **Figure 1.1**) of assessment.

## 7.2 Refining options and assessing likely effects

7.2.1 The SEA Directive requires that the Environmental Report includes the following information about reasonable alternatives:

*“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”*

- 7.2.2 Each proposal of the NDP, and their reasonable alternatives, will be assessed for their likely impacts against the SEA Framework, which will constitute Stage C and Stage D of **Figure 1.1**. These impacts will be considered in light of the likely evolution of the baseline in the absence of the NDP (i.e. a do-nothing scenario). The assessments of reasonable alternatives will help the NDP group to identify and refine options so that they are more economically, environmentally and socially sustainable. Specifically, the SEA of the Ilmington NDP will help to ensure that significant effects on the local landscape and townscape, as well as cultural heritage, will not arise.
- 7.2.3 Reasonable alternatives will be assessed through the SEA process and the assessment of alternatives will take place following consultation on the Scoping Report. This will enable options for the NDP to be explored. Whilst this report would not be a requisite of the SEA Directive, a report of this nature can help demonstrate iteration between the plan making process and the SEA and provide a coherent story of the NDP's evolution and choice of options.
- 7.2.4 The assessments of alternatives will include information in relation to:
- A description of the predicted effect;
  - The duration of the effect: whether the effect is long, medium or short term;
  - The frequency of the effect: will it be ongoing?
  - Whether the effect is temporary or permanent;
  - The geographic (international, national, regional, local) significance;
  - The magnitude of effect;
  - The severity of significance; and
  - Whether mitigation is required/possible to reduce the effect.
- 7.2.5 It is expected that during the SEA, site visits will be necessary to determine the potential landscape and visual impacts of proposals in the NDP.
- 7.2.6 The footnote for Annex I (f) of the SEA Directive states:
- "Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects".*

7.2.7 The terms 'synergistic', 'secondary' and 'cumulative' are not considered to be mutually exclusive and in this report the term 'cumulative effects' is taken to include secondary and synergistic effects. Each is defined as follows<sup>31</sup>:

- **Secondary effects** are effects that are not a direct result of the Plan, but occur away from the original effect or as a result of a complex pathway;
- **Cumulative effects** arise, for instance, where several developments each have insignificant effects, but in-combination have a significant effect, or where several individual effects of the Plan have a combined effect; and
- **Synergistic effects** interact to produce a total effect greater than the sum of the individual effects, so that the nature of the final impact is different to the nature of the individual impacts.

### 7.3 Environmental Report

7.3.1 The environmental report is a core output of the Strategic Environmental Assessment process. An environmental report for the purpose of the SEA Directive must identify, describe and evaluate the likely significant effects on the environment of implementing the NDP<sup>32</sup>. The Environmental Report will accompany the Consultation version of the NDP and will be consulted on with at least the statutory bodies Natural England, the Environment Agency and Historic England.

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<sup>31</sup> Scottish Government Strategic Environmental Assessment Tool Kit. Available at: <http://www.gov.scot/Publications/2006/09/13104943/21>

<sup>32</sup> DCLG (2015) Local Plans. Available at: <http://planningguidance.communities.gov.uk/blog/guidance/local-plans/>

# Appendix A – SEA Framework

SEA Objective	Decision making criteria	Indicators
<p><b>1</b></p> <p><b>Cultural heritage:</b> 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"> <li>• Number of Listed Buildings at risk;</li> <li>• Number of Scheduled Monuments at risk;</li> <li>• Quantity of development proposals informed by archaeological provisions;</li> <li>• Annual number of visitors to historic attractions;</li> <li>• Quantity of development within the Ilmington Conservation Area;</li> <li>• Key features of the prehistoric settlement at Ilmington harmed or rescued.</li> </ul>
<p><b>2</b></p> <p><b>Landscape:</b> 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"> <li>• Quantity and quality of development on the edge of settlements;</li> <li>• Quantity of development within, adjacent to or viewable from the Cotswolds AONB;</li> <li>• Tranquillity assessments;</li> <li>• Landscape and visual impacts assessments;</li> <li>• Key features of the Wolds LCA threatened or harmed.</li> </ul>
<p><b>3</b></p> <p><b>Water and flooding:</b> 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"> <li>• Proportion of watercourses in good or very good ecological and chemical status;</li> <li>• Number of pollution events;</li> <li>• Amount of development occurring in flood risk zones;</li> <li>• Flood risk mitigation measures in proposals;</li> <li>• Number of properties and residents at risk of surface water flooding;</li> <li>• Planning permissions granted contrary to Environment Agency advice.</li> </ul>

# Appendix B – Plans, policies and programmes review

Plan, policy and/or programme (PPP)	Main objectives and environmental / socio-economic requirements of PPP
Water and flooding	
Water Framework Directive 2000/60/EC	This provides an overarching strategy, including a requirement for EU Member States to ensure that they achieve 'good ecological status' by 2015. River Basin Management Plans were defined as the key means of achieving this. They contain the main issues for the water environment and the actions we all need to take to deal with them.
HM Government Strategy for Sustainable Construction (2008)	Encourages the construction industry to adopt a more sustainable approach towards development; identifies eleven Themes for targeting Action, which includes conserving water resources.
DEFRA The Water Environment (Water Framework Directive) (England and Wales) Regulations (2003)	<p>Requires all inland and coastal waters to reach "good status" by 2015. It mandates that:</p> <ul style="list-style-type: none"> <li>• development must not cause a deterioration in status of a waterbody; and</li> <li>• development must not prevent future attainment of 'good status', hence it is not acceptable to allow an impact to occur just because other impacts are causing the status of a water body to already be less than good.</li> </ul> <p>This is being done by establishing a river basin district structure within which demanding environmental objectives are being set, including ecological targets for surface waters.</p>
Environment Agency: Building a Better Environment: A Guide for Developers (2006)	Guidance on addressing key environmental issues through the development process (focusing mainly on the issues dealt with by the Agency), including managing flood risk, surface water management, use of water resources, preventing pollution.
National Planning Policy Framework (DCLG, 2012)	<p>The NPPF and related guidance given within the PPG state that plans should prevent development from contributing to, or being put at risk of, air or water pollution. Plans should consider the presence of Air Quality Management Areas and cumulative impacts on air quality from individual sites in local areas.</p> <p>The NPPF states that planning should protect and enhance soils, particularly those recognized as best and most versatile agricultural land (Grades 1, 2 and 3a).</p>
DEFRA (2009) Water for Life and Livelihoods: River Basin Management Plan, Severn River	River Basin Management Plans are prepared under the Water Framework Directive in order to identify the pressures facing the water environment and identify actions to address these pressures. Although predominantly rural, the Severn River basin includes urban areas including Bristol, Coventry and Cardiff. The river basin district is divided into ten catchments, five of which are in

Plan, policy and/or programme (PPP)	Main objectives and environmental / socio-economic requirements of PPP
Basin District	England (Shropshire Middle Severn, Worcestershire Middle Severn, Warwickshire Avon, Severn Vale and Bristol Avon and North Somerset Streams), three sit across the border between England and Wales (Severn Uplands, Teme and Wye) and two are in Wales (Usk and South East Valleys).
Environment Agency (2013) Warwickshire Avon Abstraction Licensing Strategy	Catchment Abstraction Management Strategies (CAMS) set out how water resources are to be managed, particularly in terms of water abstraction and guide decisions regarding granting abstraction licenses. There is water available for licensing in the Warwickshire Avon catchment.
Environment Agency (2013) Thames Abstraction Licensing Strategy	Catchment Abstraction Management Strategies (CAMS) set out how water resources are to be managed, particularly in terms of water abstraction and guide decisions regarding granting abstraction licenses. There is water available for licensing in the Thames catchment.
Severn Trent Water (2014) Final Water Resources Management Plan	<p>Severn Trent Water provides water supply and sewerage services across the NDP area. The key aims and objectives of the Water Resources Management Plan are:</p> <ul style="list-style-type: none"> <li>• Reduce waste by driving leakage down;</li> <li>• Reduce the demand for water, by working in partnership with our customers to help them become more water efficient;</li> <li>• Improve our ability to deploy existing resources flexibly and efficiently;</li> <li>• Use water trading to make more efficient use of our resources and improve resilience;</li> <li>• Develop new sources of water when required, with a focus on expanding our existing sources first; and</li> <li>• Use proactive catchment management measures to protect our sustainable sources of drinking water supply from pollution risks.</li> </ul>
Carbon Trust: The Climate Change Challenge: Scientific Evidence and Implications (2005)	This report summarises the nature of the climate change issue. It explains the fundamental science and the accumulating evidence that climate change is real and needs to be addressed. It also explains the future potential impacts, including the outstanding uncertainties.
Energy Saving Trust: Renewable Energy Sources for Homes in Urban Environments (2005)	Provides information about the integration of renewable energy sources into new and existing dwellings in urban environments. It covers the basic principles, benefits, limitations, costs and suitability of various technologies.
Environment Agency, Adapting to Climate Change: A Checklist for Development (2005)	The document contains a checklist and guidance for new developments to adapt to climate change. The main actions are summarised in a checklist.

Plan, policy and/or programme (PPP)	Main objectives and environmental / socio-economic requirements of PPP
Floods & Water Management Act (2010)	<p>Seeks to “localise” responsibility for flood risk, particularly from ordinary watercourses. Key policies within the act include:</p> <ul style="list-style-type: none"> <li>• providing the Environment Agency with an overview of all flood and coastal erosion risk management and unitary and county councils to lead in managing the risk of all local floods;</li> <li>• encouraging the uptake of sustainable drainage systems and providing for unitary and county councils to adopt SUDS for new developments and redevelopments;</li> <li>• introduce an improved risk based approach to reservoir safety;</li> <li>• widen the list of uses of water that water companies can control during periods of water shortage;</li> <li>• enabling water and sewerage companies to operate concessionary schemes for community groups on surface water drainage charges;</li> <li>• amending the Water Industry Act 1991 to provide a named customer and clarify who is responsible for paying the water bill; and</li> <li>• make it easier for water and sewerage companies to develop and implement social tariffs where companies consider there is a good cause to do so.</li> </ul>
Historic Environment	
Council of Europe: Convention on the Protection of the Architectural Heritage of Europe (1985)	Aims for signatories to protect their architectural heritage by means of identifying monuments, buildings and sites to be protected; preventing the disfigurement, dilapidation or demolition of protected properties; providing financial support by the public authorities for maintaining and restoring the architectural heritage on its territory; and supporting scientific research for identifying and analysing the harmful effects of pollution and for defining ways and means to reduce or eradicate these effects.
Council of Europe: The Convention on the Protection of Archaeological Heritage (Revised) (Valetta Convention) (1992)	The convention defines archaeological heritage and identifies measures for its protection. Aims include integrated conservation of the archaeological heritage and financing of archaeological research and conservation.
DCMS Ancient Monuments and Archaeological Areas Act (1979)	An act to consolidate and amend the law relating to ancient monuments, to make provision of matters of archaeological or historic interest, and to provide grants by secretary of state to the Architectural Heritage fund.
National Planning Policy Framework (DCLG, 2012)	The NPPF seeks to streamline the planning system and sets out the Government's planning policies and how these should be applied. At the heart of the NPPF is presumption in favour of sustainable development.

Plan, policy and/or programme (PPP)	Main objectives and environmental / socio-economic requirements of PPP
	<p>The NPPF and related guidance given within the PPG includes direction on conserving and enhancing the historic environment. It seeks to ensure local authorities plan recognise heritage assets as an irreplaceable resource and conserve them in a manner that reflects their significance.</p> <p>Local planning authorities should take into account:</p> <ul style="list-style-type: none"> <li>• the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;</li> <li>• the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; and</li> <li>• the desirability of new development making a positive contribution to local character and distinctiveness; and opportunities to draw on the contribution made by the historic environment to the character of a place.</li> </ul>
Planning (Listed Buildings and Conservation Areas) Act (1990)	An act to consolidate certain enactments relating to special controls in respect of buildings and areas of special architectural or historic interest with amendments to give effect to recommendations to give effect to recommendations of the Law Commissions.
Circular on the Protection of World Heritage Sites, CLG 07/2009 2	<p>The purpose of this circular, which applies only to England, is to provide updated policy guidance on the level of protection and management required for World Heritage Sites.</p> <p>The circular explains the national context and the Government's objectives for the protection of World Heritage Sites, the principles which underpin those objectives, and the actions necessary to achieve them.</p>
Office of the Deputy Prime minister (ODPM) Secure and Sustainable Buildings Act (2004)	Amends the Building act, and others, with regard to sustainable construction practices and conservation of historic buildings. Also states the general nature of security provisions which should be in place at the construction stage and beyond.
Historic England: Historic Environment Good Practice Advice in Planning Note 1, 2 and 3 (2015)	These three notes provide information on good practice to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the PPG
<b>Landscape</b>	
Council of Europe: European Landscape Convention (2006)	Aims to promote the protection, management and planning (including active design and creation of Europe's landscapes, both rural and urban, and to foster European co-operation on landscape issues.
National Planning Policy Framework (DCLG, 2012)	The NPPF and related guidance given within the PPG states that development could seek to promote or reinforce local distinctiveness; both aesthetic considerations and connections between people and places should be considered. The NPPF also

Plan, policy and/or programme (PPP)	Main objectives and environmental / socio-economic requirements of PPP
	promotes the protection and enhancements of valued landscapes, giving greatest weight to National Parks and Areas of Outstanding Natural Beauty.
Cotswold AONB Management Plans (2013 – 2018 and 2018 – 2023)	<p>There is a strong emphasis on partnership working and the need for public bodies to fulfil their commitment to work towards helping to conserve and enhance the AONB.</p> <ul style="list-style-type: none"> <li>• Ambition 1: Promotion of the Cotswolds as the Walking and Exploring Capital of England.</li> <li>• Ambition 2: The local design and delivery of a Cotswolds package of agri-environment payments for public goods and services and rural development support.</li> <li>• Ambition 3: Ensuring communities and businesses within and around the AONB identify and celebrate being part of a nationally recognised landscape.</li> <li>• Ambition 4: To fully explore the case for and against the Cotswolds being designated as England’s next National Park.</li> </ul>
Warwickshire County Council landscape character assessment	<p>Warwickshire County Council’s Landscape Team pioneered the landscape character assessment process, which considered the unique and distinctive landscapes of Warwickshire. The project culminated in the production of Warwickshire landscapes guidelines which map and describe the special characteristics of the county’s landscapes. This study identified Ilmington as being within the Wold Landscape Character Area (LCA). This LCA is characterized by features including:</p> <ul style="list-style-type: none"> <li>• Broad, rounded hills, capped by oolitic limestone;</li> <li>• Deep secluded river valleys and combes;</li> <li>• Rich, red soils, supporting productive and arable farmland;</li> <li>• A large scale geometric field pattern;</li> <li>• A remote landscape of small nucleated stone villages and hamlets; and</li> <li>• Steep hillsides with unimproved grassland.</li> </ul> <p>The management strategy provided for the Wold LCA is to conserve the distinctive identity and remote rural character of the region. The overall guidelines provided for the LCA are to conserve the distinctive local character of Cotswold villages.</p>

# Appendix C – Consultation Responses

Date: 25 September 2018  
Our ref: 256788  
Your ref: Illmington NDP



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Lepus Consulting Ltd

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**BY EMAIL ONLY**

Dear Catherine,

**Planning consultation: Illmington Neighbourhood Development Plan – SEA Scoping**

Thank you for your consultation which was received by Natural England on 25 September 2018.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

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

**Policies, Plans and Programmes**

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

**Baseline Information**

Natural England are content with the baseline information used in the writing of the submitted report.

**Sustainability Framework**

Natural England generally supports the sustainability objectives contained within the framework as they satisfactorily cover our interests in the natural environment.

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

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

For any queries relating to the specific advice in this letter only please contact Tom Amos on 02080 260961. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

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



Yours sincerely

Tom Amos  
Planning for a Better Environment  
West Midlands Team



# Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

## Natural environment information sources

The [Magic](http://magic.defra.gov.uk/)<sup>1</sup> website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here](#)<sup>2</sup>.

**Priority habitats** are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)<sup>3</sup>. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

**National Character Areas** (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)<sup>4</sup>.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](http://magic.defra.gov.uk/)<sup>5</sup> website and also from the [LandIS website](http://www.landis.org.uk/)<sup>6</sup>, which contains more information about obtaining soil data.

## Natural environment issues to consider

The [National Planning Policy Framework](https://www.gov.uk/government/publications/national-planning-policy-framework--2)<sup>7</sup> sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/)<sup>8</sup> sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

<sup>1</sup> <http://magic.defra.gov.uk/>

<sup>2</sup> <http://www.nbn-nfbr.org.uk/nfbr.php>

<sup>3</sup> <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

<sup>4</sup> <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

<sup>5</sup> <http://magic.defra.gov.uk/>

<sup>6</sup> <http://www.landis.org.uk/index.cfm>

<sup>7</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>8</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

## Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

## Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)<sup>9</sup>), such as Sites of Special Scientific Interest or [Ancient woodland](#)<sup>10</sup>. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

## Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)<sup>11</sup>) or protected species. To help you do this, Natural England has produced advice [here](#)<sup>12</sup> to help understand the impact of particular developments on protected species.

## Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)<sup>13</sup>.

## **Improving your natural environment**

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife.
- Adding a green roof to new buildings.

<sup>9</sup><http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

<sup>10</sup><https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

<sup>11</sup><http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

<sup>12</sup><https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

<sup>13</sup><http://publications.naturalengland.org.uk/publication/35012>

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#) <sup>14</sup>).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

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<sup>14</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>



Historic England

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Ms Catherine Wright

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17 September 2018

Dear Ms Wright

**ILMINGTON NEIGHBOURHOOD PLAN- SEA SCOPING**

Thank you for your consultation and the invitation to comment on the SEA Scoping Document for the above Neighbourhood Plan.

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.

I hope this is helpful.

Yours sincerely,

Peter Boland  
Historic Places Advisor  
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cc:



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Having had a quick look at your scoping report it is apparent the triggers for an SEA in this instance were in fact related to Landscape and Cultural Heritage, and as such I feel we would not have had significant comments to make given the sites proposed were outside the flood zones.

I hope Natural England and Historic England were able to provide more detailed comments on these matters and support you in taking this forward.

**Jane Field**

**Planning Specialist – Sustainable Places | West Midlands Area**

**Environment Agency | Sentinel House, 9 Wellington Crescent, Fradley Park, Lichfield, Staffordshire, WS13 8RR**



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