

# Strategic Environmental Assessment and Habitats Regulations Assessment of the Ilmington Neighbourhood Development Plan

## **SEA and HRA Screening Document**

July 2018



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

# Strategic Environmental Assessment and Habitats Regulations Assessment of the Ilmington Neighbourhood Development Plan

## SEA and HRA Screening Document

LC-365	Document Control Box
Client	Ilmington Parish Council
Report Title	Strategic Environmental Assessment and Habitats Regulations Assessment of the Ilmington Neighbourhood Development Plan: SEA and HRA Screening Document
Filename	LC-365_Ilmington_SEA_HRA_Screening_8_190718JE.docx
Date	July 2018
Author	CW
Reviewed	JE
Approved	NJD

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## Acronyms

AONB	Area of Outstanding Natural Beauty
EIA	Environmental Impact Assessment
IRZ	Impact Risk Zone
LCA	Landscape Character Area
NCA	National Character Area
NDP	Neighbourhood Development Plan
NPPF	National Planning Policy Framework
PP	Policy or Programme
PPG	Planning Policy Guidance
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage System

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# 1 Introduction

## 1.1 This report

1.1.1 This screening report has been prepared to determine whether the Ilmington Neighbourhood Development Plan 2011 – 2031 (NDP) should be subject to a Strategic Environmental Assessment (SEA), in accordance with the European Directive 2001/42/EC (SEA Directive) and the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations).

1.1.2 This report screens the February 2018 Pre-Submission Consultation Version of the Ilmington Neighbourhood Development Plan. Policies proposed in the NDP are summarised in **Appendix A**.

## 1.2 The Ilmington Neighbourhood Development Plan

1.2.1 The creation of neighbourhood development plans started with the Government's Localism Act 2011. The Act set out a series of measures to shift power away from central government and towards local people. One of the Localism Act's key components is the Neighbourhood Development Plan; a new tier in planning policy which enables local people to shape the development of the community in which they live.

1.2.2 The Ilmington Neighbourhood Development Plan has been developed on behalf of Ilmington Parish Council by residential 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.

1.2.3 The Plan must also have appropriate regard to existing policy, including:

- The National Planning Policy Framework and related Planning Practice Guidance advice;
- The Cotswolds AONB Management Plan 2013-18, which provides essential guidance as a significant part of the Parish and village of Ilmington lie within the designation; and

- Historic environment policies for the Stratford-on-Avon Core Strategy as much of the village is within a Conservation Area.

1.2.4 The NDP proposes development of 1.78ha over three sites for approximately 26 dwellings.

### 1.3 The Parish of Ilmington

1.3.1 Ilmington, found in the Stratford-on-Avon District of Warwickshire, is a 1,343ha rural parish situated within the northern tip of the Cotswolds Area of Outstanding Natural Beauty (AONB). The Parish is located approximately 12km south of Stratford-upon-Avon, 25km west of Banbury and 34km north east of Cheltenham.

1.3.2 The Parish, which has an estimated population of 740 (2016)<sup>1</sup>, is described as a 'gateway to the Cotswolds' from the north. There is a strong and distinctive sense of rural tranquillity across the Parish associated with high quality countryside. Ilmington is the highest village in Warwickshire and is at the foot of the Ilmington Downs, which is the highest point in Warwickshire. The Church of England parish church of St Mary the Virgin is Norman and dates from about the middle of the 12<sup>th</sup> century.

1.3.3 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. Any development within the area requires an archaeological survey prior to planning decisions. The entirety of the village is within the Cotswold AONB.

1.3.4 Ilmington is a Category 3 Local Service Village as stated in the Core Strategy 2011-2031<sup>2</sup> and has been allocated for approximately 59 dwellings by 2031. To date, 21 have been built or have planning permission, leaving 38 further homes to be built.

1.3.5 Outside the village of Ilmington, the Parish is sparsely developed, retaining its strong rural character.

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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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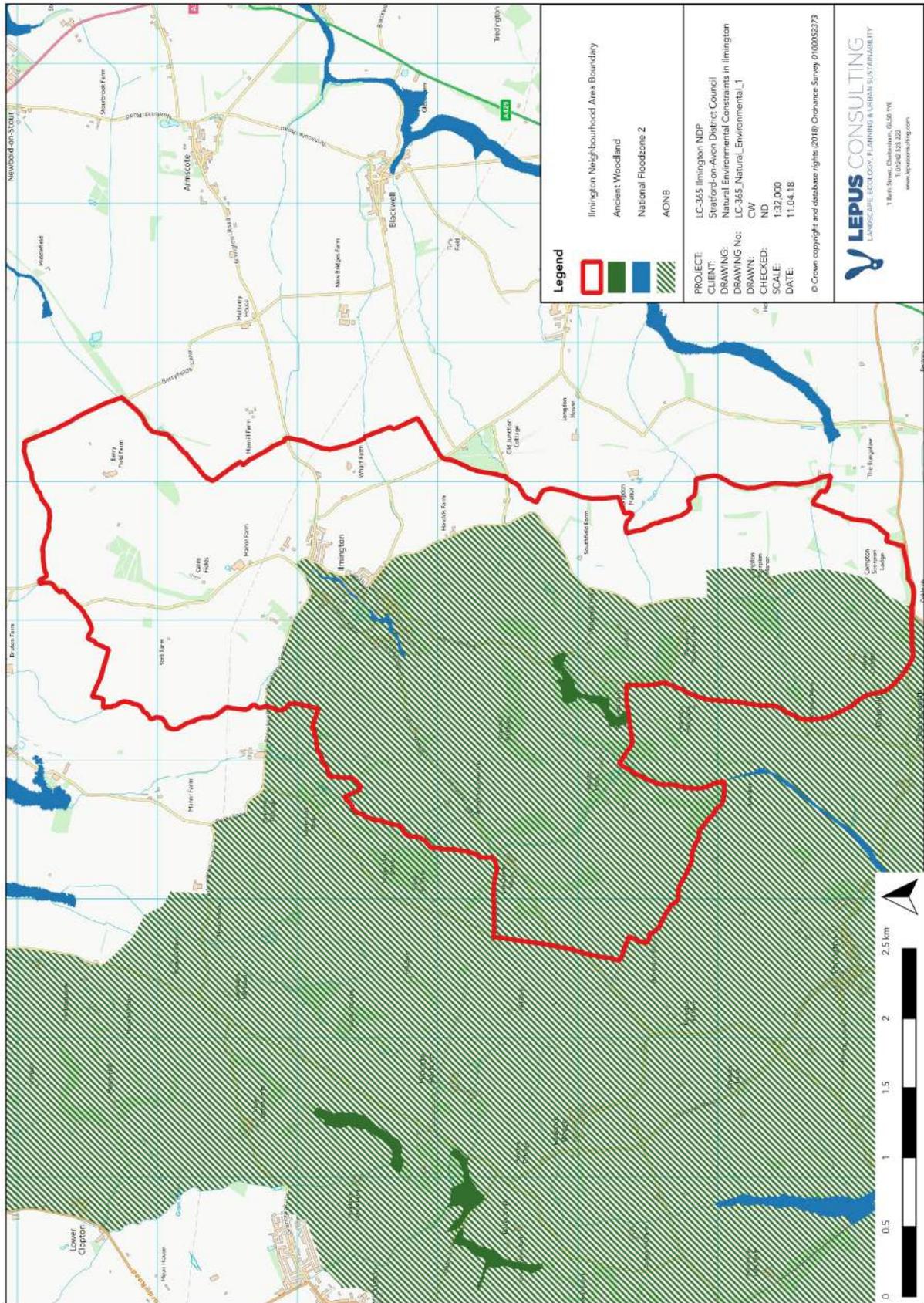


Figure 1.1: AONB, ancient woodland and flood zone 2 in the parish of Ilmington.

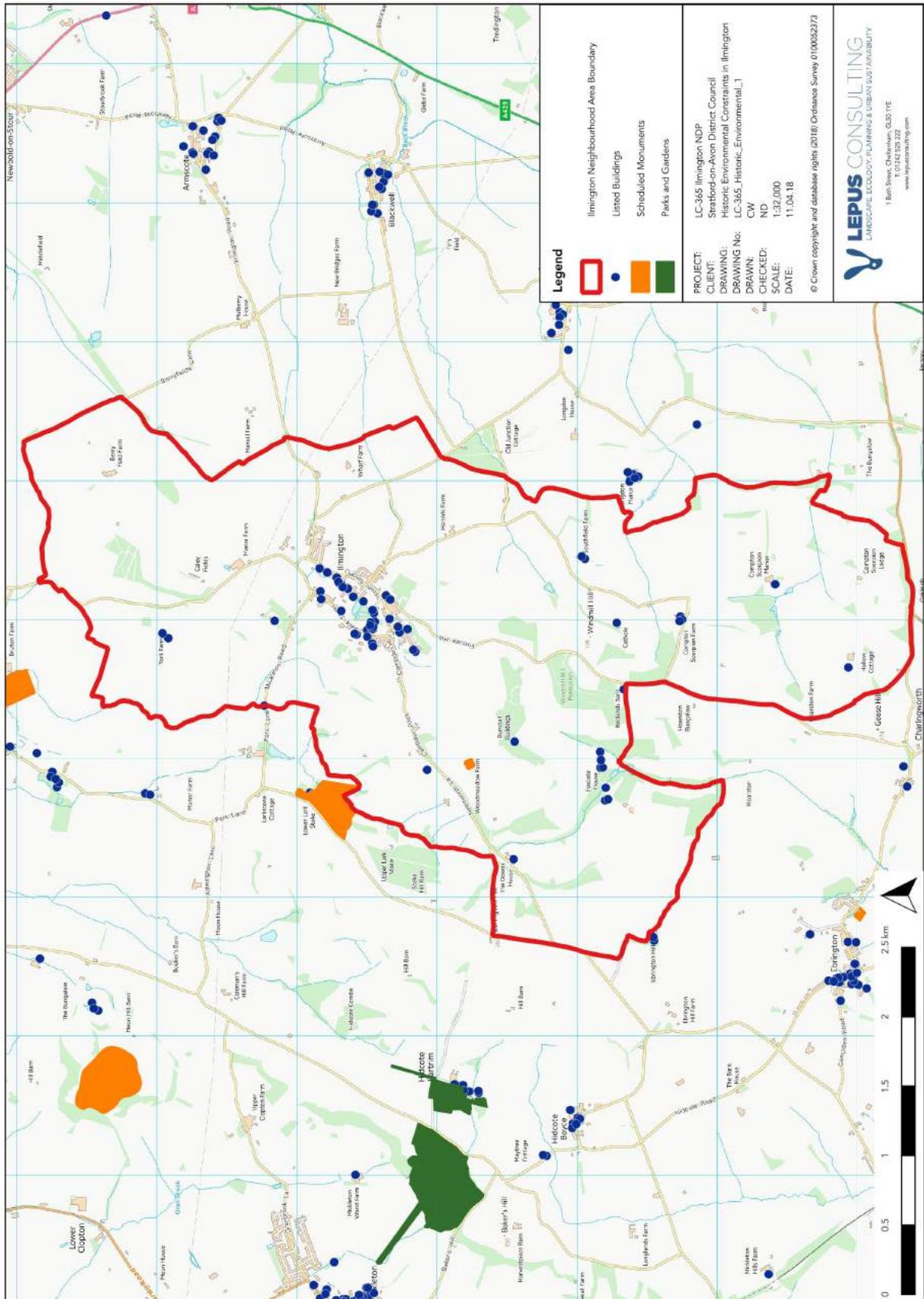


Figure 1.2: Cultural heritage assets in Ilmington.

## 1.4 Relationship with the Core Strategy

- 1.4.1 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, along with the Core Strategy and other development plan documents and supplementary planning documents.
- 1.4.2 The NDP sets out a series of policies that, once made, will be used to guide development and help to determine future planning applications. 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.
- 1.4.3 Neighbourhood Plans are smaller in geographic scale than Core Strategies and Local Plans, and serve to add further detailed policies and proposals to these documents.

## 2 The Screening Process

### 2.1 Strategic Environmental Assessment screening

2.1.1 The SEA Directive was transposed into English law by the SEA Regulations. Detailed guidance of these regulations can be found in the Government publication '*A Practical Guide to the Strategic Environmental Assessment Directive*' (ODPM, 2005) and Paragraph 009 of the Planning Practice Guidance (PPG) 'Neighbourhood Planning' section.

2.1.2 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.

2.1.3 The process for determining whether or not an SEA is required is called screening. In order to screen, it is necessary to determine if a plan will have significant environmental effects using the criteria set out in Annex II of the SEA Directive and Schedule I of the SEA Regulations. A determination cannot be made until the three statutory consultation bodies have been consulted: the Environment Agency, Natural England and Historic England.

2.1.4 Within 28 days of its determination, the local planning authority, by virtue of its legal responsibility for NDPs, must publish a statement, setting out its decision. If they determine that an SEA is not required, the statement must include the reasons for this.

### 2.2 The screening process

2.2.1 The Localism Act requires NDPs to be in general conformity with the strategic policies of the adopted development plan for the local area. In this instance, the plan must be in general conformity with the Stratford-on-Avon Core Strategy 2011-2031.

2.2.2 Paragraph 009 of the Planning Practice Guidance (PPG) 'Neighbourhood Planning' section states:

*'Where a neighbourhood plan is brought forward before an up-to-date Local Plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in:*

- the emerging neighbourhood plan*
- the emerging Local Plan*
- the adopted development plan*

*with appropriate regard to national policy and guidance'.*

2.2.3 Figure 2.1 presents a diagram prepared by the ODPM (2005). This shows the application of the SEA process to plans and programmes. The sequential approach in the flow diagram can be used to screen the Ilmington NDP.

2.2.4 Table 2.1 uses the questions presented in Figure 2.1 to establish whether there is a need for SEA for the Ilmington NDP.

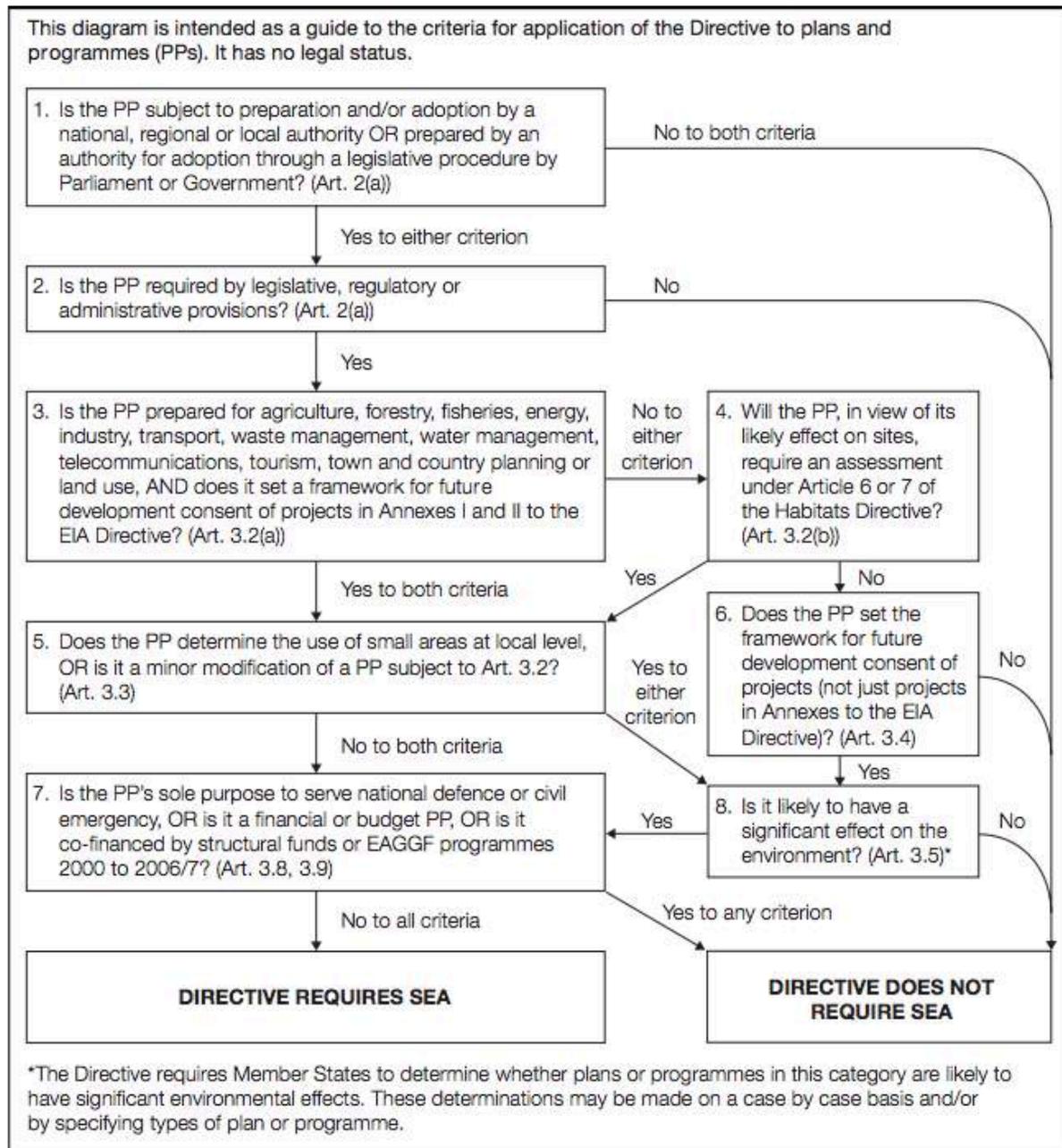


Figure 2.1: Application of the SEA Directive to plans and programmes<sup>3</sup>.

<sup>3</sup>ODPM (2005) A Practical Guide to the Strategic Environmental Assessment Directive

Table 2.1: Establishing whether there is a need for SEA

Stage	Y/N	Reason
Is the PP (plan or programme) subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	Yes	The plan constitutes an NDP, which will be subject to independent examination and brought into legal force if it receives 50% or more affirmative votes at referendum. The NDP would form part of the statutory development plan for Stratford-on-Avon.
Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))	No	Communities and neighbourhoods have a right to produce an NDP, however it is not required by legislative, regulatory or administrative bodies. If the NDP is adopted it would become part of the statutory development plan, meaning it should continue to be screened under the SEA Directive.
Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))	No	The NDP is a land-use plan and sets the framework for future development consents within the Ilmington Neighbourhood area.  However, the NDP is unlikely to set a framework for consent of projects in Annex 1 of the EIA Directive.
Will the PP, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))	No	See Chapter 3
Does the PP set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)? (Art 3.4)	Yes	The NDP does set the framework for future development consent of projects.
Is it likely to have a significant effect on the environment? (Art. 3.5)	Yes	See Section 2.5 – 2.12 and Chapter 4
Is the PP's sole purpose to serve national defence or civil emergency, OR is it a financial budget PP, OR is it co-financed by structural funds or EAGGD programmes 2000 to 2006/7? (Art 3.8, 3.9)	No	The NDP is aimed to be an influential document for Stratford-on-Avon's Core Strategy.

## 2.3 Relevance to the SEA Directive

2.3.1 Question 8 within the ODPM guidance (see **Figure 2.1**) refers to whether the NDP would have a significant effect on the environment. The criteria from Annex II of the SEA Directive and Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations (2004) can be used to consider the relevance of the plan to the SEA Directive. **Sections 2.5 – 2.12** consider the likely environmental effects of the plan.

*Table 2.2: Ilmington NDP and the SEA Directive*

Criteria (from Annex II of SEA Directive and Schedule I of Regulations)	Response
The characteristics of plans and programmes	
(a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources	The NDP is prepared for town and country planning and will form a part of the development management framework for Ilmington Parish.
(b) the degree to which the plan or programme influences other plans and programmes including those in a hierarchy	The NDP must be in general conformity with the strategic planning policies set out in the Stratford-on-Avon Core Strategy and the National Planning Policy Framework.
(c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development	The NDP contains policies to protect the natural environment, such as the Natural Environment Strategic Objectives (NE1-6). There are also objectives to promote heritage and archaeological assets, local green spaces, and environmental sustainability.
(d) environmental problems relevant to the plan or programme	Key issues include: <ul style="list-style-type: none"> <li>• Potential changes to the setting of Listed Buildings; and</li> <li>• Potential changes to the landscape character and distinctiveness of the Cotswolds AONB.</li> </ul>
(e) the relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection)	The NDP is a land use plan and sets the framework for future development consents within the Ilmington NDP area.  It also sets out policies which planning applications within the NDP area will need to adhere to.
Characteristics of the effects and of the area likely to be affected	

(a) the probability, duration, frequency and reversibility of the effects	<p>The NDP could potentially result in the permanent change in the setting of Listed Buildings (see <b>section 2.11</b>).</p> <p>The NDP could potentially introduce short term adverse impacts to the Cotswolds AONB (see <b>section 2.12</b>).</p>
(b) the cumulative nature of the effects	Cumulative landscape impacts are possible across the Cotswold escarpment.
(c) the transboundary nature of the effects	The NDP is not expected to give rise to any significant transboundary environmental effects.
(d) the risks to human health or the environment (for example, due to accidents)	There are no anticipated risks of the NDP on human health.
(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	The magnitude and spatial extent of the effects outlined in (a) are not thought to extend further than the plan area although cumulative impacts of small scale landscape change along the Cotswolds escarpment will require assessment before being able to address this question.
(f) the value and vulnerability of the area likely to be affected due to: <ul style="list-style-type: none"> <li>(i) special natural characteristics or cultural heritage</li> <li>(ii) exceeded environmental quality standards or limit values</li> <li>(iii) intensive land-use</li> </ul>	The NDP would be likely to affect the setting of Listed Buildings in the Parish and the landscape value of the Cotswolds AONB.
(g) the effects on areas or landscapes which have a recognised national, Community or international protection status	The NDP would potentially alter the character and setting of the Cotswold AONB, which is recognised as having national protection status.

## 2.4 Determination of likely significant effects

2.4.1 It is not the purpose of a screening report to appraise policies, the Environmental Report element of the SEA process would deliver this function. Screening is undertaken at the beginning of the plan making process so that the SEA can influence from the start rather than from a perspective of retro-fitting or halfway through a process.

2.4.2 A summary of baseline conditions and an assessment of the potential effects of the NDP against each of the topics set out in Annex I (f) of the SEA Directive is presented in the following sections. The NDP policies are set out in **Appendix A**.

## 2.5 Biodiversity, flora and fauna

2.5.1 Over half of the Parish is situated within the Cotswold AONB. The nearest European protected site is Midsummer Meadows SSSI, situated 1.7km east of the Parish.

2.5.2 SSSI Impact Risk Zones (IRZs) allow for a rapid initial assessment of the potential risks posed by development proposals. They define zones around each SSSI site which reflect the particular sensitivities of the features for which it is notified and indicate the types of development which could potentially have adverse impacts.

2.5.3 The Parish falls within an IRZ for Midsummer Meadows SSSI. However, the NDP does not propose development of a scale or type which would be likely to impact the SSSI. The NDP will also not adversely impact the stand of Ancient Woodland to the south of the Parish. The Parish is not within close proximity of any other local, national or international designated biodiversity features.

2.5.4 The Natural Environment Strategic Objective proposes numerous policies which aim to preserve and enhance the wildlife and habitats found within Ilmington Parish. Habitats surrounding Ilmington village are a mix of semi-improved grassland, scattered scrub, arable land and improved grassland. Some protected species have been identified within the Parish, including the small heath butterfly (*Coenonympha pamphilus*), badger (*Meles meles*), brown hare (*Lepus europaeus*), and numerous bat species; common pipistrelle (*Pipistrellus pipistrellus*), soprano pipistrelle (*Pipistrellus pygmaeus*) and noctule (*Nyctalus noctula*).

2.5.5 Policy NE.2 hopes to ensure all new development near existing aquatic habitats are designed to enhance the natural environment and encourage biodiversity. This includes the major stream that runs through the centre of the village called the Middle Brook.

2.5.6 Various policies within the NDP are likely to help the NDP achieve the Natural Environment Strategic Objective. These include:

- NE.1 – Biodiversity, Wildlife and Habitat Conservation and Protection
- NE.2 – Aquatic Habitat
- NE.3 – Boundary Treatments and Landscaping

- NE.4 – Allotments and Orchards
- DC.6 – Environmental Sustainability
- LSG.1 – Local Green Spaces

2.5.7 Allocated site 3 is situated on previously undeveloped greenfield so it is likely there will a loss of grassland and hedgerow following the proposed development. Allocated sites 1 and 2 are previously developed sites, both of which currently have buildings on. There will be a minimal loss of biodiversity at these sites.

2.5.8 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.

## 2.6 Population and human health

2.6.1 Within the Parish there is relatively restricted access to key facilities. There is a village hall, village shop and post office. There is one primary school and the nearest GP surgery is over 6km away, in Chipping Campden. Although only a limited quantity of development is proposed within the Parish, there are concerns over the future pressure on these services. Policy ETA.4 encourages the improvement of current community facilities and resists the loss of existing facilities.

2.6.2 The Future Housing and Growth Strategic Objective aims to ensure development meets the local demand through sustainable growth. The development of three or more houses have been allocated at three sites (shown in **Figure 2.2**) and a strategic reserve site if a shortfall in housing is identified. Allocations have been directed towards sites on previously-developed land, that are not prominent in the landscape and meet other essential criteria.

2.6.3 The largest development at Mabel's Farm (approximately 20 dwellings) should make a positive contribution to the village as stated under policy HG.3. The site is already partly developed, reducing the biodiversity and landscape impacts development could have, and parts of the current farm have been labelled as an 'eyesore', so development poses the opportunity to improve its current condition. The site is close to village amenities and would be easily integrated into the village.

2.6.4 Policies DC.1-3 all support the development within the current neighbourhood area. This is considered likely to ensure access to local amenities for new residents.

- 2.6.5 The NDP has designated Local Green Spaces and any development that is likely to harm these spaces or its significance will not be supported (see Figure 2.3).
- 2.6.6 Overall, it is anticipated that the policies led out in the NDP will improve the population and human health of Ilmington Parish.

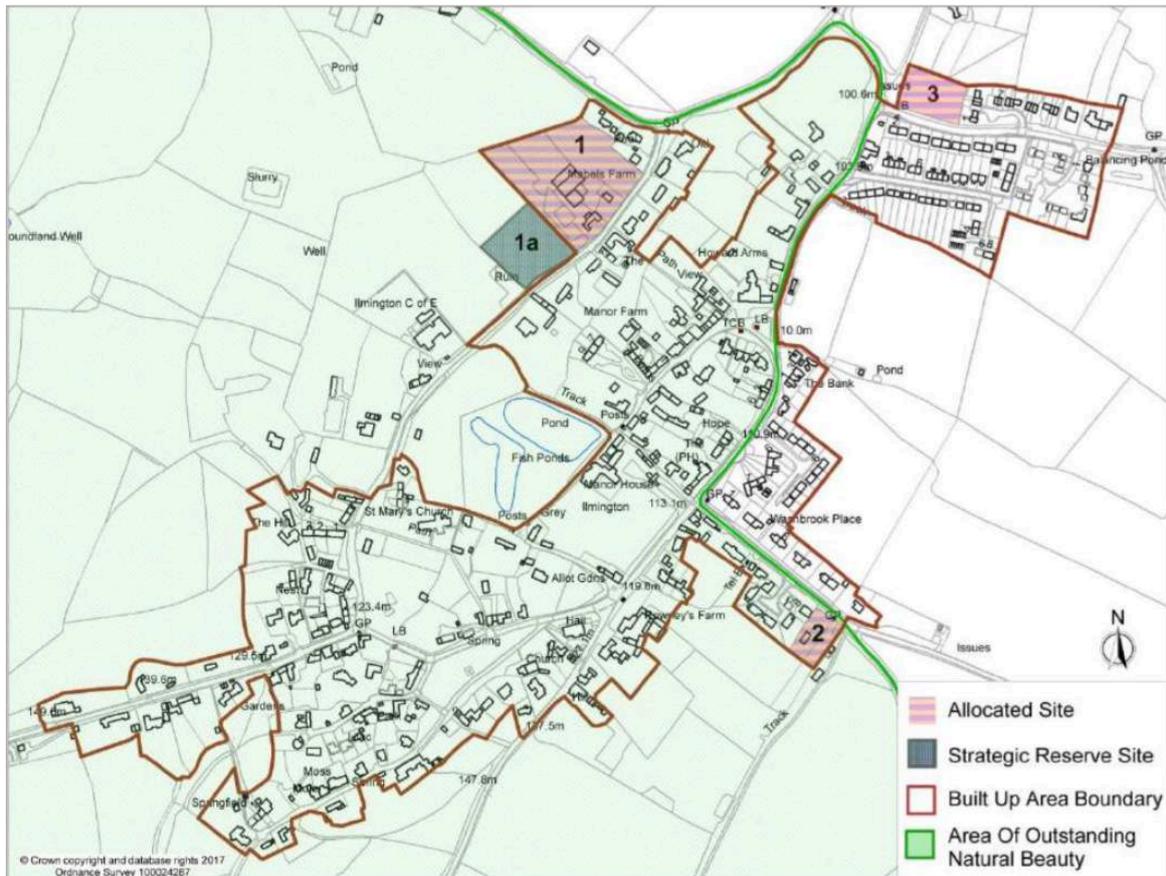


Figure 2.2: Site allocations and strategic reserve site within Ilmington village.

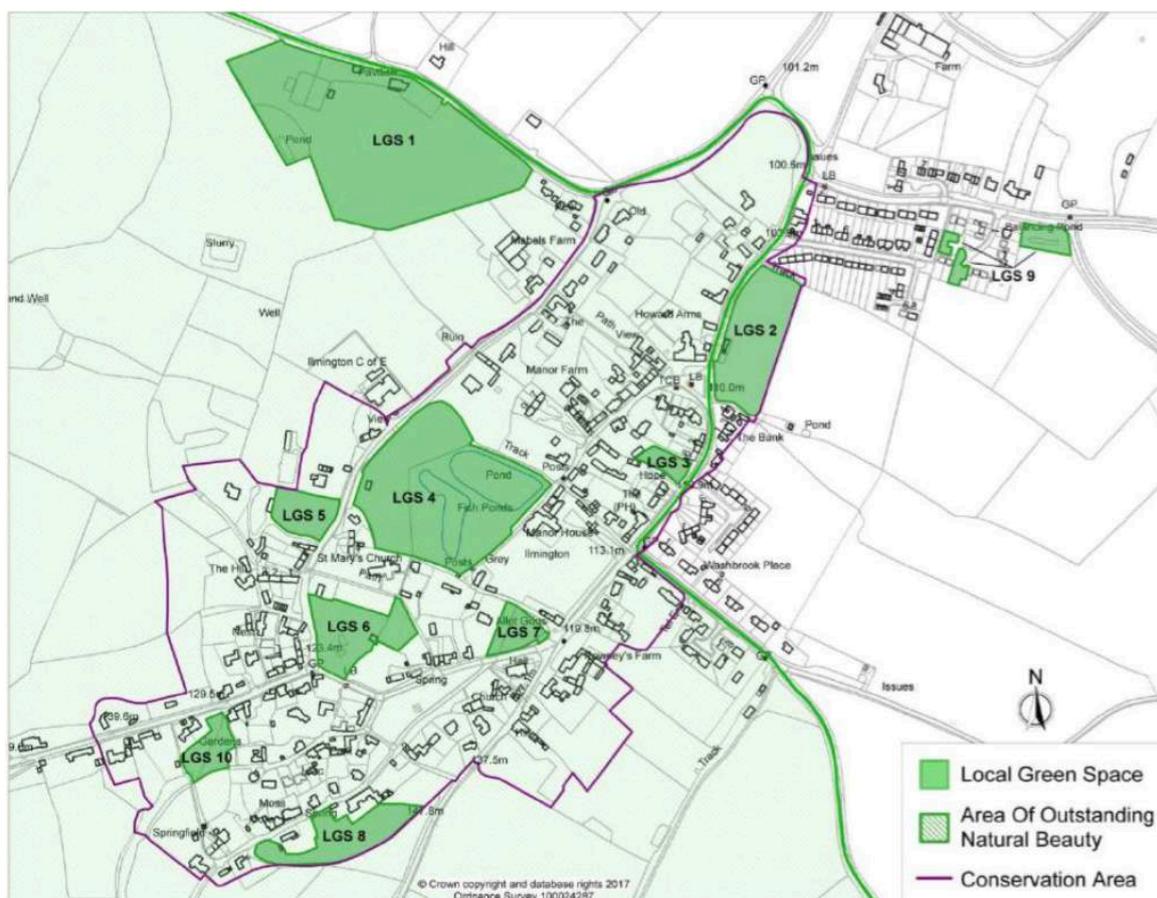


Figure 2.3: Ilmington village designated Local Green Spaces

## 2.7 Transport and accessibility

- 2.7.1 Whilst not an Annex 1(f) topic in itself, transport and accessibility interacts with a number of the topics such as population and human health, material assets and climatic factors. There is an approximate twelve minute walk from one side of the village to the other, so it is likely that development at the proposed edges of the current neighbourhood boundary would be within walking distance to the majority of the village services.
- 2.7.2 A key issue with travel in village is the safety of walking and cycling. Policy ETA.5 seeks to ensure that new development will support and enhance the current Public Right of Way (PRoW) network and prioritise walking and cycling opportunities. Policy DC.4 also states that new housing should be designed to ensure safe connectivity to the village's amenities and existing pavement network.
- 2.7.3 The nearest shopping centre is 12km away in Stratford-upon-Avon. Public transport within the Parish is limited, with only four bus stops, with infrequent services running to Stratford-upon-Avon and Lower Brailes.
- 2.7.4 The nearest railway station is approximately 10km away at Honeybourne.

2.7.5 Approximately 65% of households have two or more cars and therefore Ilmington already has a problem with congestion and on-street parking. Congestion in the village is expected to be having adverse impacts on human health due to air pollution, whilst increasing the local area's contribution towards the causes of climate change. On street parking visually detracts from cultural heritage assets such as Listed Buildings. Many of the homes within the Parish were built prior to the era of motor vehicles and do not have adequate parking facilities. Policy DC.7 states that new development should ensure; parking spaces at a ratio of one space per bedroom, appropriate cycle storage, and parking areas discreetly sited to avoid detracting from the village scene. Sufficient spaces should also be provided for visitors.

2.7.6 The NDP would be likely to have negligible impacts on transport and accessibility.

## 2.8 Soil, water and air

2.8.1 The Parish covers predominantly Agricultural Land Class (ALC) Grade 3 land, but also with large areas of Grade 2 and 4 land. Policies DC.1-3 promote development within the neighbourhood area and built-up area boundary (**Figure 2.2**) which is anticipated to help minimise soil resource loss. Sites allocated from development are on ALC Grade 3 land, therefore there would be an adverse impact on the local extent of versatile soils. However, versatile soil loss will be negligible as the NDP only proposes development on 1.78ha of land.

2.8.2 There are no major roads within the Parish boundary and therefore there is limited air, noise or light pollution from roads and road transport. It is anticipated the NDP will not alter this.

2.8.3 The Middle Brook runs through the centre of the village, leading to an area prone to fluvial flooding. The village is surrounded by hills on three sides, so rainfall and ground water often drain into the centre of the village, then flow into a stream to the north. A vast area of the village is prone to surface water flooding. The northern part of the Parish experiences periodic surface water flooding.

2.8.4 Policy INF.1 aims to ensure new development will not increase the flood risk to current residents and states the use of Sustainable Urban Drainage Systems (SUDS) should be incorporated into any new development to control on-site run-off. None of the proposed allocated sites would place new residents in placed in flooding zones. Any proposals that do not address issues with fluvial or surface water flooding will not be supported.

2.8.5 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.

## 2.9 Climatic factors

2.9.1 Policy DC.6 aims to design proposed development to support renewable technologies such as solar panels and heat pumps, eco-friendly forms of construction, including the use of locally sourced building materials, and to ensure new buildings are energy efficient.

2.9.2 Policy LGS.1 looks at the protection and enhancement of local green spaces, which may result in benefits that can help climate change adaptation, such as carbon dioxide uptake and storage.

2.9.3 Ilmington is limited in terms of sustainable transport options, which leaves residents highly dependant on their cars to access services, facilities and employment. The number of proposed dwellings is small, so it is anticipated that there would be a negligible increase in greenhouse gas emissions.

2.9.4 The NDP proposes a very limited quantity of development and will be likely to have a negligible impact on climate change.

## 2.10 Material assets

2.10.1 The material assets topic considers social, physical and environmental infrastructure. This sub-section should be read alongside 'Population and human health', which details some health and social infrastructure implications of the NDP; 'Climatic factors', which considers transport infrastructure in terms of sustainable transport; 'Soil, water and air', which considers water infrastructure and agricultural land classification; and the 'Biodiversity, flora and fauna' sub-section, which considers environmental infrastructure.

2.10.2 Policy ETA.1 aims to help improve local employment opportunities whilst ETA.2 aims to support those residents which choose to work from home. Over half of the households within the Parish believe there should be an encouragement of more local businesses and jobs within the Parish and that improved telecommunications connectivity, such as faster internet speeds, would make a difference. These policies would also reduce the number of residents outward-commuting and therefore reduce the quantity of private car journeys. Other policies anticipated to have a positive impact on the local economy include ETA.3 'Rural Tourism' and ETA.4 'Sustaining Local Amenities'.

## 2.11 Cultural heritage (including architectural and archaeological features)

- 2.11.1 There are approximately 60 Grade II and Grade II\* Listed Buildings across the Parish. Most of these buildings are located in and around the village. All three sites allocated for development are within the neighbourhood boundary and they could potentially result in an alteration to the setting or character of the local area for a range of Listed Buildings.
- 2.11.2 The Scheduled Monument 'Rectangular earthwork at Nebsworth', an English Civil War earthworks raised during military operations between 1642 and 1645, is not situated near any proposed development and is unlikely to be impacted in any way.
- 2.11.3 The Heritage and Archaeological Assets Strategic Objective of the NDP states that '*development proposals should demonstrate how they will conserve or enhance the neighbourhood area's historic environment including archaeological assets*'. The majority of Ilmington village is situated within a Conservation Area and an area of high archaeological sensitivity<sup>4</sup> and policy HA.1 will help to ensure these assets are conserved for future benefit.
- 2.11.4 In line with the Stratford-on-Avon Core Strategy, where proposals will affect a heritage asset, applicants will be required to undertake and provide an assessment of the significance of the asset using a proportionate level of detail relating to the likely impact the proposal will have on the asset's historic interest.
- 2.11.5 Given the range of heritage assets in the Parish, and that the NDP is proposing an additional 26 homes for the village, it is recommended that the potential impacts on cultural heritage are investigated further.

## 2.12 Landscape

- 2.12.1 The Parish is located outside the Green Belt. The Parish is split between two National Character Areas (NCAs); the Cotswolds NCA and the Dunsmore and Feldon NCA.

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<sup>4</sup> Historic Environment Assessment of Local Service Villages, Stratford-on-Avon District 2012, Section 4.16 .9

- 2.12.2 Over half of Ilmington Parish lies within the Cotswolds AONB, and it is therefore necessary for development to be consistent with policies of the AONB Management Plan<sup>5</sup>. These have been set out in the latest Management Plan produced by the Cotswolds Conservation Board and reflect the content of the Cotswold AONB Landscape Character Assessment (LCA). The NDP is within the Escarpment Outlier LCA, within 1F - Meon and Ebrington Hills sub-division. This is the northernmost of the Cotswolds outliers. Ilmington sits at the base of Ebrington Hill, where the siltstones and mudstones extend into the vale.
- 2.12.3 Policy DC.5 aims to ensure development integrates with the Parish's landscape character and enhances it where possible. Policy NE.1 helps ensure measures are in place to improve landscape quality, scenic beauty and tranquility within the Parish. Other policies in the NDP that are anticipated to help ensure development does not lead to adverse impacts on the landscape include:
- NE.3 – Boundary Treatments and Landscaping;
  - NE.5 – Tranquility; and
  - NE.6 – Dark Skies.
- 2.12.4 Two of the allocated sites are within the AONB and within the built-up boundary of the Parish. Extension into the surrounding landscape is likely to be limited but could potentially alter views from the AONB into the Parish and vice versa.
- 2.12.5 The NDP proposes a total of 23 new dwellings which will be situated within the AONB. It is uncertain the extent to which this may alter the character or setting of the AONB. Additionally, the proposed development could potentially alter distinctive views into, or out of, the AONB for sensitive receptors such as local residents and users of the PRow network. Given this, a significant impact on landscape as a result of the NDP cannot be objectively ruled out this stage and it would be appropriate to investigate these impacts further.

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<sup>5</sup> Cotswolds AONB Management Plan 2018-2013. Available at:  
<http://www.cotswoldsaonb.org.uk/planning/cotswolds-aonb-management-plan/>

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## 3 HRA Screening Process

### 3.1 Habitats Regulations Assessment screening

3.1.1 HRA screening is a requirement of Regulation 102 of the Conservation of Habitats and Species Regulations 2010<sup>6</sup>.

3.1.2 HRA considers the potential adverse impacts of plans and projects on designated Special Areas of Conservation (SACs), classified Special Protection Areas (SPAs) and listed Ramsar sites. This is in accordance with the Habitats Directive<sup>7</sup> and the Birds Directive<sup>8</sup>. SACs, SPAs and Ramsar sites are collectively known as the Natura 2000 network.

3.1.3 Should a development, plan or project be considered likely to have a significant impact on a Natura 2000 site, the HRA proceeds to an Appropriate Assessment. If likely significant effects cannot be avoided, mitigated or compensated to the extent that the conservation status of the EU site will not be undermined, the HRA proceeds to Imperative Reasons of Overriding Interest (IROPI).

### 3.2 Determination of likely significant effects

3.2.1 The nearest Natura 2000 site to Ilmington Parish is Bredon Hills SAC, located approximately 20km west. The development and policies proposed within the NDP are unlikely to impact on the SAC in any way. Based on the available information, a significant impact of the NDP on any Natura 2000 site can be objectively ruled out at this stage.

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<sup>6</sup> Conservation of Habitats and Species Regulations 2010. Available at: <http://www.legislation.gov.uk/ukxi/2010/490/regulation/102/made>

<sup>7</sup> EU Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora

<sup>8</sup> EU Council Directive 2009/147/EC on the Conservation of wild birds

## 4 Conclusions

### 4.1 SEA Screening outcome

4.1.1 This screening report has explored the potential effects of the proposed Ilmington NDP with a view to determining whether an environmental assessment is required under the SEA Directive.

4.1.2 In accordance with topics cited in Annex 1(f) of the SEA directive, significant effects on the environment may occur as a result of the NDP. The topic areas likely to be affected by the NDP are cultural heritage and landscape.

4.1.3 It is recommended that the potential impacts of the NDP on the AONB, as well as Listed Buildings, are investigated further through a full SEA. This SEA should focus on the landscape and cultural heritage topics.

### 4.2 HRA Screening outcome

4.2.1 This screening report has explored the potential effects of the proposed Ilmington NDP with a view to determining whether a habitats regulations assessment is required.

4.2.2 It is recommended that the Ilmington Neighbourhood Development Plan should not be screened into the HRA process.

### 4.3 Consultation

4.3.1 This report was subject to a six-week consultation with Natural England, Environment Agency and Historic England. Their comments are presented in **Appendix B**.

4.3.2 Each statutory authority has agreed that the Ilmington NDP should undergo SEA due to the potential impact on landscape and cultural heritage, whilst Natural England have confirmed that the NDP can be screened out of HRA. The Environment Agency have also requested that the water environment be considered during the SEA.

# Appendix A: Ilmington NDP Policies

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

# Appendix B: Consultation Responses

Stratford On Avon District Council  
Planning Policy  
Elizabeth House  
Church Street  
Stratford-upon-Avon  
Warwickshire  
CV37 6HX

**Our ref:** UT/2007/101490/SE-  
24/SC1-L01

**Your ref:**

**Date:** 18 July 2018

Dear Sir/Madam

## **SEA AND HRA SCREENING DOCUMENT**

### **ILMINGTON NEIGHBOURHOOD PLAN**

Thank you for referring the above Screening Request which was received on 06 June 2018. We apologise for the delay in responding, however hope that you are still able to take our advice into account.

We concur with the conclusions of the above report, undertaken by Lepus Consulting, dated May 2018, which states that a SEA should be undertaken in support of this plan.

We note policies INF1, NF2 and NE2, and welcome that the three site allocations are located outside the mapped fluvial floodzones, 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.

Yours faithfully

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

Environment Agency  
9, Sentinel House Wellington Crescent, Fradley Park, Lichfield, WS13 8RR.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)

Cont/d..

Direct dial 020 3025 3006

Direct fax 01543 444161

Direct e-mail [swmplanung@environment-agency.gov.uk](mailto:swmplanung@environment-agency.gov.uk)



Historic England

WEST MIDLANDS OFFICE

Ms Catherine Wright  
Lepus Consulting Ltd.  
1 Bath Street  
Cheltenham  
GL50 1YE

Direct Dial: 0121 625 6887

Our ref: PL00392282

29 May 2018

Dear Ms Wright

### **ILMINGTON NEIGHBOURHOOD PLAN- SEA SCREENING**

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

For the purposes of consultations on SEA Screening Opinions, Historic England confines its advice to the question, "Is it likely to have a significant effect on the environment?" in respect of our area of concern, cultural heritage.

Our comments are based on the information supplied with the screening request. On the basis of the information supplied and in the context of the criteria set out in Schedule 1 of the Environmental Assessment Regulations [Annex II of the 'SEA' Directive], Historic England concurs with your view that the preparation of a Strategic Environmental Assessment is required.

The views of the other statutory consultation bodies should be taken into account before the overall decision on the need for a SEA is made. If a decision is made to undertake a SEA, please note that Historic England has published guidance on Sustainability Appraisal / Strategic Environmental Assessment and the Historic Environment that is relevant to both local and neighbourhood planning and available at: <https://www.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>

I trust the above comments will be of help in taking forward the Neighbourhood Plan.

Yours sincerely,

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

cc:



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TF

Telephone 0121 625 6870  
HistoricEngland.org.uk





Historic England

WEST MIDLANDS OFFICE

Ms Catherine Wright  
Lepus Consulting Ltd.  
1 Bath Street  
Cheltenham  
GL50 1YE

Direct Dial: 0121 625 6887

Our ref: PL00392282

14 June 2018

Dear Ms Wright

Thank you for the amended SEA Screening report and I can confirm that the comments from Historic England are unchanged from those set out in our previous letter, which I attach to the e-mail accompanying this letter.

Yours sincerely,

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

cc:



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TF

Telephone 0121 625 6870  
HistoricEngland.org.uk



Date: 21 June 2018  
Our ref: 248937  
Your ref: Ilmington NDP



Catherine Wright  
Lepus Consulting

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Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

**BY EMAIL ONLY**

T 0300 060 3900

Dear Ms Wright,

**Planning consultation: Ilmington Neighbourhood Development Plan – SEA and HRA Screening.**

Thank you for your consultation on the above dated 06/06/2018.

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.

**Strategic Environmental Assessment Screening**

We welcome the production of this SEA Screening report. Natural England notes and concurs with the screening outcome i.e. that an SEA is required.

Further guidance on deciding whether the proposals are likely to have significant environmental effects and the requirements for consulting Natural England on SEA are set out in the [National Planning Practice Guidance](#).

Natural England recommends that a Landscape Sensitivity and Capacity Approach is considered when allocating sites for development within the plan area, and recommends that the Cotswold AONB Board should be consulted for their comments on potential impacts on the Cotswolds AONB.

**Habitats Regulations Assessment Screening**

Natural England notes the screening process applied to this Neighbourhood plan. We agree with the Council's conclusion of no likely significant effect upon the named European designated site:

- Breedon Hill SAC

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

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Ecological Services

Green Infrastructure

Landscape and Visual Impact Assessment

Landscape Character Assessment

Habitats Regulations Assessment

Strategic Environmental Assessment

Sustainability Appraisal



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