

# Strategic Environmental Assessment and Habitats Regulations Assessment of the Napton-on-the-Hill Neighbourhood Development Plan

## **SEA and HRA Screening Document**

February 2019



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

# Strategic Environmental Assessment and Habitats Regulations Assessment of the Napton-on-the-Hill Neighbourhood Development Plan

## SEA and HRA Screening Document

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## Acronyms

<b>ALC</b>	Agricultural Land Class
<b>BUAB</b>	Built-Up Area Boundary
<b>EIA</b>	Environmental Impact Assessment
<b>EU</b>	European Union
<b>GP</b>	General Practice
<b>HRA</b>	Habitats Regulations Assessment
<b>IROPI</b>	Imperative Reasons of Overriding Interest
<b>IRZ</b>	Impact Risk Zone
<b>LCA</b>	Landscape Character Assessment
<b>LGS</b>	Local Geological Site
<b>LWS</b>	Local Wildlife Site
<b>NDP</b>	Neighbourhood Development Plan
<b>NHS</b>	National Health Service
<b>NPPF</b>	National Planning Policy Framework
<b>ODPM</b>	Office of the Deputy Prime Minister
<b>PP</b>	Policy or Programme
<b>PPG</b>	Planning Policy Guidance
<b>PRoW</b>	Public Right of Way
<b>SAC</b>	Special Area of Conservation
<b>SEA</b>	Strategic Environmental Assessment
<b>SPA</b>	Special Protection Areas
<b>SSSI</b>	Site of Special Scientific Interest
<b>SuDS</b>	Sustainable Urban Drainage System

# 1 Introduction

## 1.1 This report

1.1.1 This screening report has been prepared to determine whether the Napton-on-the-Hill Neighbourhood Development Plan 2018 - 2031 (NDP) should be subject to a Strategic Environmental Assessment (SEA), in accordance with the European Directive 2001/42/EC<sup>1</sup> (SEA Directive) and the Environmental Assessment of Plans and Programmes Regulations 2004<sup>2</sup> (SEA Regulations).

1.1.2 This report screens the November 2018 'Pre-Submission Draft for Public Consultation' of the Napton-on-the-Hill Neighbourhood Development Plan 2018 - 2031<sup>3</sup>.

## 1.2 Strategic Environmental Assessment

1.2.1 The basis for Strategic Environmental Assessment legislation is European Directive 2001/42/EC. This was 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'<sup>4</sup> and Paragraph 009 of the Planning Practice Guidance (PPG) 'Neighbourhood Planning' section<sup>5</sup>.

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<sup>1</sup> Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=en> [Date Accessed: 19/12/18]

<sup>2</sup> Available at: <http://www.legislation.gov.uk/ukxi/2004/1633/contents/made> [Date Accessed: 19/12/18]

<sup>3</sup> Napton Parish Council (2018) Napton-on-the-Hill Neighbourhood Development Plan 2018-2031, Pre-submission Draft for Public Consultation. Available at: <http://www.naptonparishcouncil.org.uk/wp-content/uploads/2018/11/Napton-Neighbourhood-Plan-Pre-submission-Draft-for-ConsultationJH.pdf> [Date Accessed: 10/12/18]

<sup>4</sup> Available at: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/7657/practicalguidesea.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf) [Date Accessed: 19/12/18]

<sup>5</sup> Available at: <https://www.gov.uk/guidance/neighbourhood-planning--2> [Date Accessed: 19/12/18]

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1.2.2 Under the requirements of the European Directive 2001/42/EC and Environmental Assessment of Plans and Programmes Regulations 2004, certain types of plans that set the framework for the consent of future development projects must be subject to an environmental assessment.

### 1.3 The Napton-on-the-Hill Neighbourhood Development Plan

1.3.1 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 (NDP); a new tier in planning policy which enables local people to shape the development of the community in which they live.

1.3.2 On 18 July 2017 Stratford-on-Avon District Council formally approved the boundary of the designated neighbourhood area of Napton-on-the-Hill (see **Figure 1.1**). Napton-on-the-Hill Parish Council also set up a Neighbourhood Plan Steering Group to develop a NDP.

1.3.3 The NDP offers a picture of the Parish and a vision for the 13 year period between 2018 and 2031. The NDP's core aim is to ensure that all development is sustainable and accords with the preferences of the local community.

1.3.4 The Napton-on-the-Hill NDP has been developed on behalf of the Parish Council by residential volunteers within the Neighbourhood Plan Steering Group. Evidence gathering and analysis between 2017 and 2018, including public meetings, consultations and a questionnaire for residents, have led to the creation of policies and the existing documentation.

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

- The National Planning Policy Framework<sup>6</sup> and related Planning Practice Guidance advice<sup>7</sup>; and
- Policies within the Stratford-on-Avon District Core Strategy<sup>8</sup>.

1.3.6 A summary of the NDP's policies are listed in **Appendix A**. These are associated with the NDP's strategic objectives as follows:

- Housing;
- Economy;
- Environmental Quality;
- Historic Environment;
- Natural Environment; and
- Services and Facilities.

### Consultation

1.3.7 The NDP is subject to public consultation, which provides an opportunity for the public and local organisations to comment on the NDP. After consultation, responses are taken into account and used to prepare a 'submission draft' of the NDP.

1.3.8 The submission version of the NDP is then subject to inspection by the Independent Examiner. If the Independent Examiner approves the NDP it will then be subject to a local referendum. If 50% or more of people voting in the referendum support the NDP, then the NDP will be adopted, will gain statutory status and will become integral to the Stratford-on-Avon District Council Local Plan.

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<sup>6</sup> Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/740441/National\\_Planning\\_Policy\\_Framework\\_web\\_accessible\\_version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf) [Date Accessed: 20/12/18]

<sup>7</sup> Available at: <https://www.gov.uk/government/collections/planning-practice-guidance> [Date Accessed: 20/12/18]

<sup>8</sup> Stratford District Council (2016) Stratford-on-Avon Core Strategy 2011 to 2031. Available at: <https://www.stratford.gov.uk/planning-regeneration/core-strategy.cfm> [Date Accessed: 11/12/18]

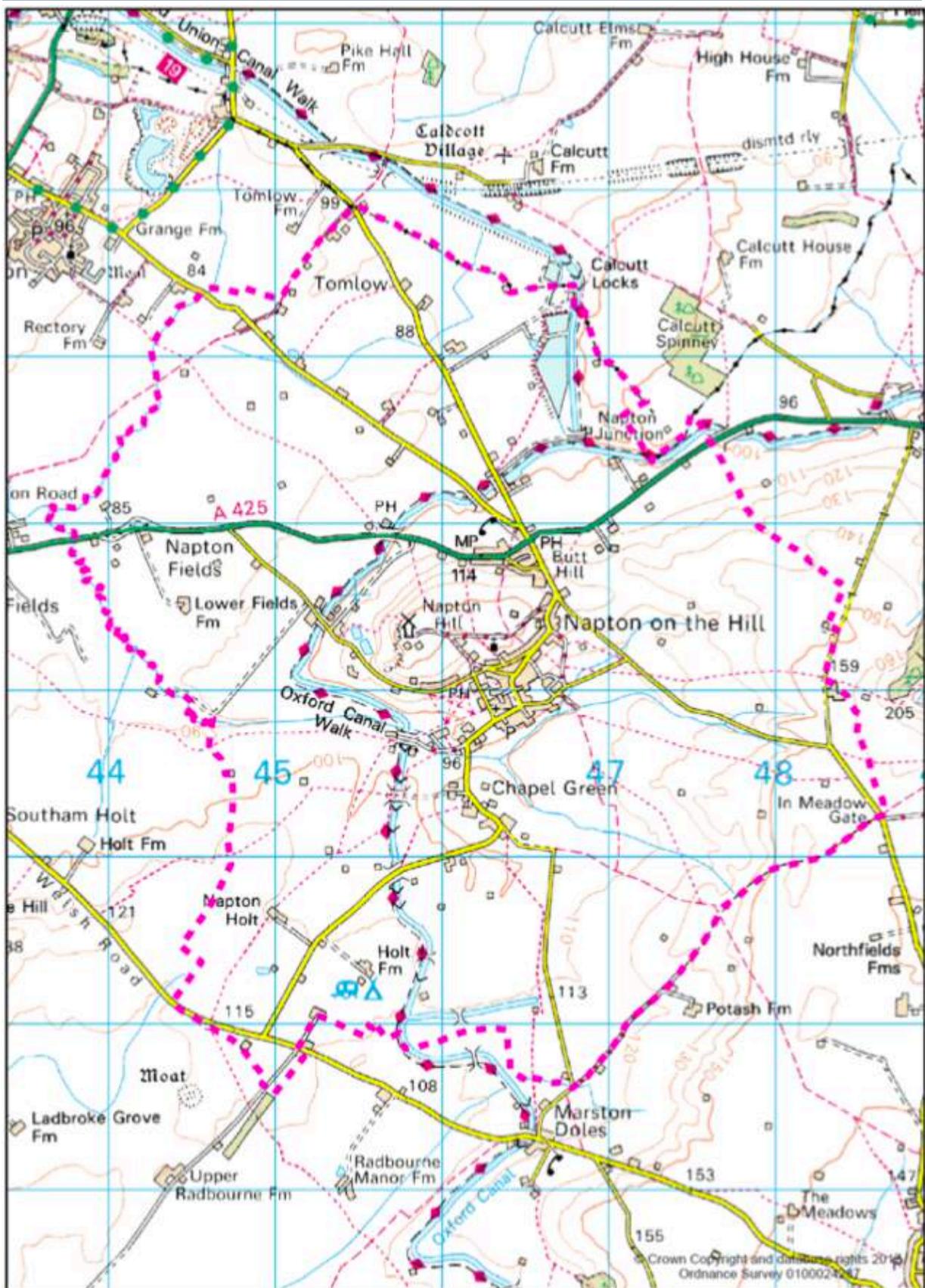


Figure 1.1: Napton-on-the-Hill Parish Boundary (source: NDP)

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## **1.4 The Parish of Napton-on-the-Hill**

- 1.4.1 Napton-on-the-Hill (hereafter referred to as Napton) is situated in the Stratford-on-Avon District of Warwickshire, and comprises 1,627ha of predominantly rural landscape. It is located approximately 27km east of Stratford-upon-Avon, and 5km east of Southam.
- 1.4.2 Napton is situated at the top of Napton Hill, giving long-distance views towards the adjacent countryside. The Oxford Canal winds around the western side of the village, supporting a network of towpaths and Public Rights of Way (PRoW). The Napton Junction also falls within the north-east of the Parish, where the Oxford Canal meets the Grand Union Canal.
- 1.4.3 Napton has a population of approximately 1,100 and comprises of 455 dwellings. Residents of Napton benefit from the rural character, inclusive community and historic heritage of the Parish.
- 1.4.4 The historic buildings within the Parish, including the Church of St Lawrence and Napton Windmill are notable landmarks due to the topography of Napton. The local canal network, once an important transportation route, now provides an asset both for recreation and wildlife.
- 1.4.5 There are several clubs and societies located within the Parish that organise community activities and social engagements for residents. In addition Napton Sports Club offers a range of recreational facilities including sports pitches and tennis courts. The village supports a range of services including a village shop, post office and café, as well as a primary school, village hall and public houses.

## **1.5 Relationship with the Core Strategy**

- 1.5.1 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 Napton Parish. As noted above, once adopted, the NDP will form part of the Development Plan for the District, alongside the Core Strategy and other development plan documents and supplementary planning documents.

- 1.5.2 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 District Core Strategy 2011-2031.
- 1.5.3 NDPs are smaller in geographic scale than Core Strategies and Local Plans and serve to add further detailed policies and proposals to these documents. The Napton NDP and the Stratford-on-Avon District Core Strategy will form part of the development plan for the area once the NDP is ‘made’.
- 1.5.4 The Revised NPPF<sup>9</sup> states that *“Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies”*.
- 1.6 Assumptions**
- 1.6.1 For the purposes of this screening assessment a number of assumptions have been made as follows.
- 1.6.2 The NDP does not allocate any land for residential development. However, the emerging Site Allocations Plan, envisaged to be *“adopted by the District Council at the end of 2019”* will identify ‘reserve sites’ for housing development that may be released to meet future housing needs.
- 1.6.3 The NDP refers to the derelict ‘Napton Brickworks’ brownfield site as a potential location that might be suitable for housing development. This site has not been allocated in the NDP and is contradictory with ‘Policy 1’ of the NDP. The site has therefore not been considered further throughout this report.
- 1.6.4 Should the NDP be further developed in the future, a re-screening of any amendments will need to be undertaken for the purposes of the SEA and HRA screening processes.

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<sup>9</sup> Available at:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/740441/National\\_Planning\\_Policy\\_Framework\\_web\\_accessible\\_version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf) [Date Accessed: 19/12/18]

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## 2 The Screening Process

### 2.1 Strategic Environmental Assessment screening

2.1.1 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. It helps to ensure 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.

2.1.2 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.

2.1.3 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 NDP must be in general conformity with the Stratford-on-Avon District 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 Napton 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 Napton NDP.

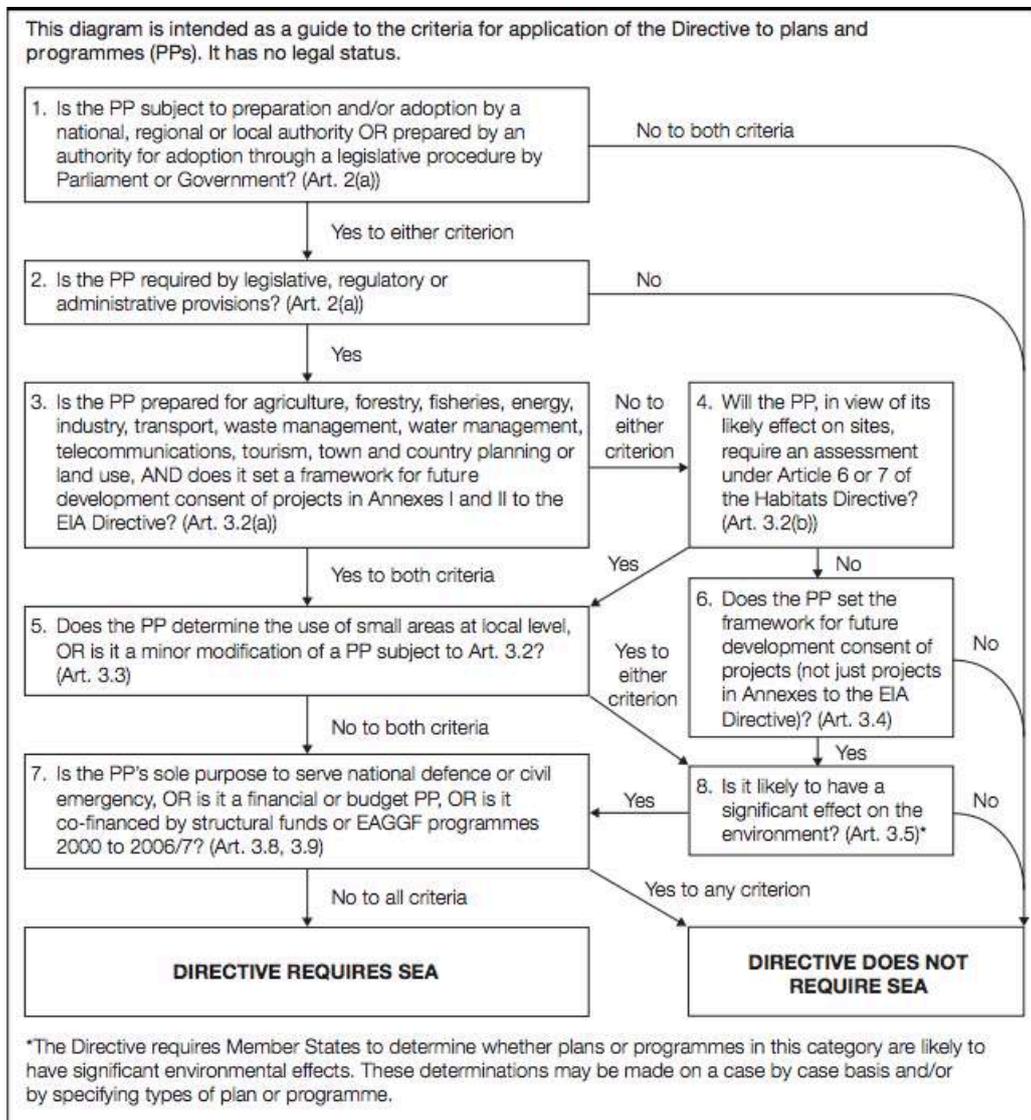


Figure 2.1: Application of the SEA Directive to plans and programmes<sup>10</sup>.

<sup>10</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 Napton-on-the-Hill 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 <b>Chapter 3</b> and <b>Chapter 4</b>
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)	No	See <b>Section 2.5 - 2.12</b> and <b>Chapter 4</b>
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	Not applicable.

## 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 will 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: Napton-on-the-Hill 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 Napton-on-the-Hill 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 District Core Strategy 2011 – 2031 and the National Planning Policy Framework. The NDP forms part of the statutory development plan for Stratford-on-Avon.
(c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development	There are opportunities to integrate environmental considerations within the Napton-on-the-Hill NDP. The NDP contains policies that aim to conserve important environmental features, including the rural character of the landscape, historic heritage assets and open green spaces.
(d) environmental problems relevant to the plan or programme	No environmental issues were identified relevant to the plan.
(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 Napton-on-the-Hill 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	The NDP is not expected to result in any significant environmental effects.

(b) the cumulative nature of the effects	The NDP is not considered to have any cumulative effects and is not thought to contribute to cumulative impacts in combination with the Stratford-on-Avon District Core Strategy.
(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 NDP is unlikely to result in any significant adverse environmental effects. It is likely that some policies will help preserve and enhance environmental features within the Neighbourhood Area.
(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>	It is considered to be unlikely that the NDP would adversely impact the special natural characteristics or cultural heritage features within the Neighbourhood Area. The NDP would not be expected to cause exceedances of environmental standards or lead to intensive land use.
(g) the effects on areas or landscapes which have a recognised national, Community or international protection status	The NDP is unlikely to result in any adverse impacts on protected landscapes.

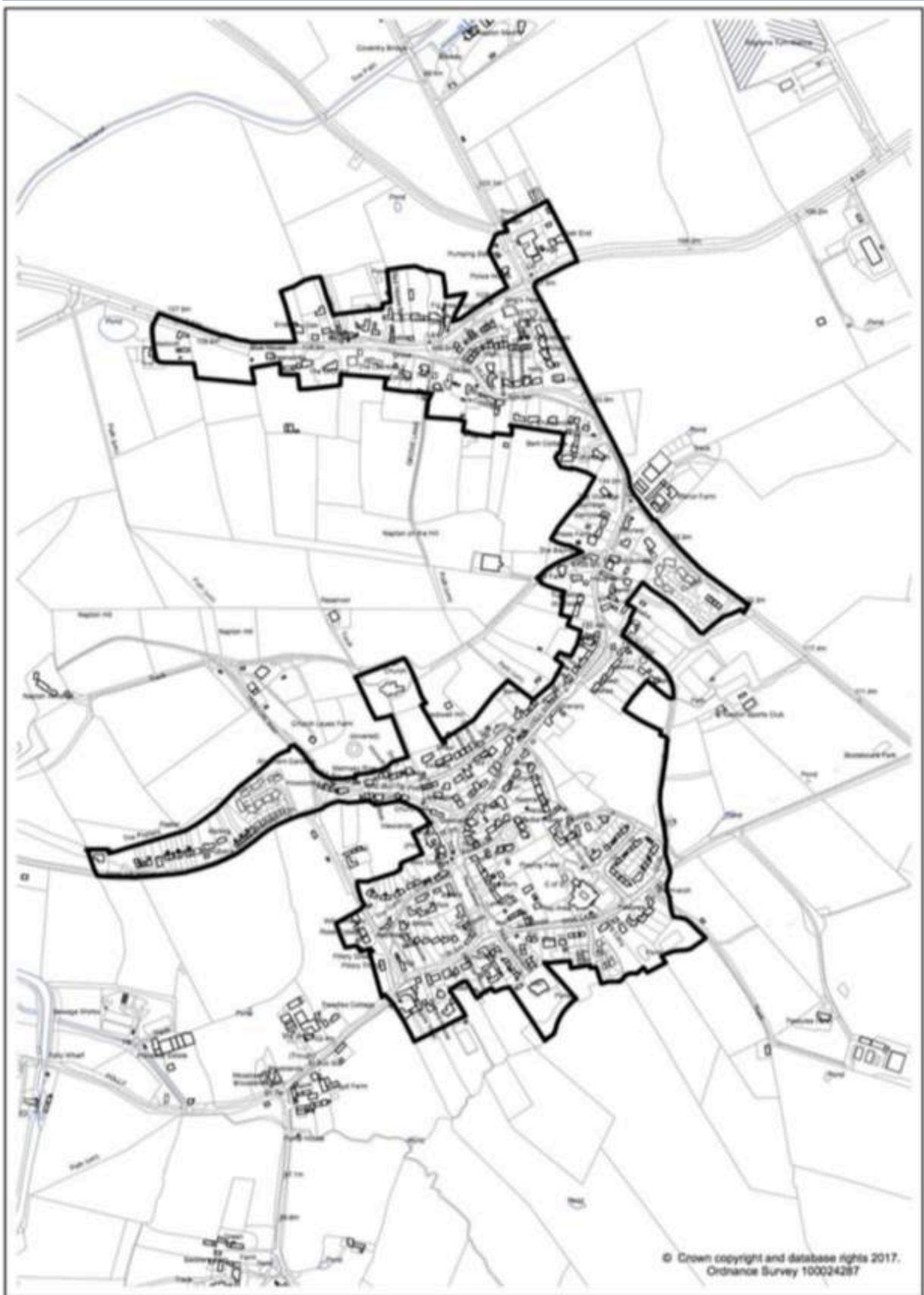
## 2.4 Determination of likely significant effects

2.4.1 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**.

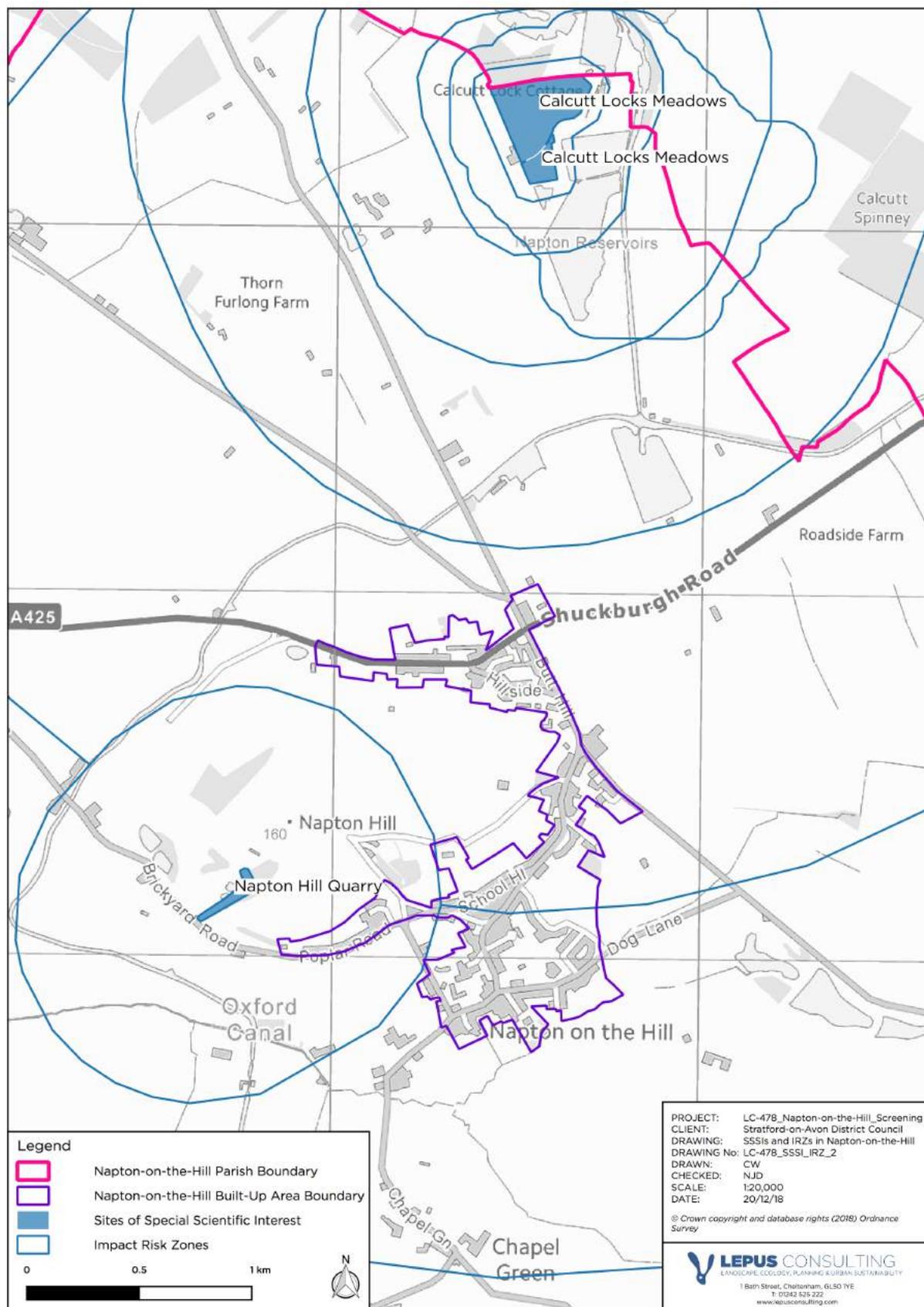
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## 2.5 Biodiversity, flora and fauna

- 2.5.1 There are two Sites of Special Scientific Interest (SSSIs) located within the Napton Parish; ‘Napton Hill Quarry’ SSSI (also designated as a Local Wildlife Site (LWS)) which is situated in the centre of the Parish adjacent to Napton Windmill, and ‘Calcutt Locks Meadows’ SSSI located in the north-east of the Parish adjacent to Napton Reservoir. In addition, ‘Napton Hill Sandstone Doggers’ is a designated Local Geological Site (LGS) situated in close proximity to ‘Napton Hill Quarry’ SSSI.
- 2.5.2 ‘Policy 1’ in the NDP states that residential developments must be “*located within the defined Built-Up Area Boundary*” (**Figure 2.2**). However, a significant area in the south of Napton’s Built-Up Area Boundary (BUAB) falls within the Impact Risk Zones (IRZs) of ‘Calcutt Locks Meadows’ and ‘Napton Hill Quarry’ SSSIs (see **Figure 2.3**). Any development, other than householder applications, within these IRZs should be consulted on. In conformity with the Stratford-on-Avon District Core Strategy ‘Policy CS.6’, no development should be permitted in this area. Since the NDP does not allocate sites, at present there is no reason to expect any negative impact on these SSSIs. However, this should be considered if any locations are proposed for site allocation in the future.
- 2.5.3 ‘Policy 11’ states that “*a proposal for development should protect mature trees, woodlands and important hedgerows wherever possible*”. ‘Policy 5’ and ‘Policy 8’ state the importance of creating green infrastructure networks and Local Green Spaces. These policies will help to ensure that these features are protected and result in positive impacts for biodiversity, flora and fauna.
- 2.5.4 At this stage, the NDP does not propose any sites for development. Due to this, alongside the Policies outlined in the NDP, it is considered unlikely that any future development within Napton’s BUAB will result in significant negative impacts on local biodiversity features.



*Figure 2.2: Napton built-up area boundary (BUAB) (source: NDP)*



**Figure 2.3:** 'Napton Hill Quarry' and 'Calcutt Locks Meadows' SSSIs and associated IRZs in Napton BUAB (source: Natural England).

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## 2.6 Population and human health

- 2.6.1 There are no health facilities located within Napton, the closest being in Southam, which is situated 5km to its west. The nearest NHS Hospital is Warwick Hospital, approximately 17km west of Napton.
- 2.6.2 The Parish also contains three public houses, a local shop, a Village Hall and Sports Pavilion for social and recreational activities. In addition, there are two religious buildings, and two schools, as well as several sports pitches and playing fields.
- 2.6.3 'Policy 12' sets out a number of criteria that must be met by future development, in order to help ensure that important local services and community assets located within the Parish are maintained and protected. This includes facilities that host local clubs and societies including public houses, schools, playgrounds and the Village Hall.
- 2.6.4 Due to the rural location of Napton, residents have excellent access to a range of open spaces and natural habitats. 'Policy 8' of the NDP designates four Local Green Spaces which will be protected from future development that could potentially harm the openness and green quality that characterises the Parish.
- 2.6.5 There is a high reliance on car usage in Napton due to its rural location, with the majority of residents commuting via car to work. On average, there are two or more cars per household according to the NDP. 'Policy 5' notes that any future development will "*minimise the emission of air pollutants*" and so reduce negative impacts to human health associated with these emissions.
- 2.6.6 'Objective 3' in the NDP aims "*to promote and enhance local business opportunities to support a vibrant rural economy*", and therefore may help to provide local employment opportunities for residents.
- 2.6.7 It is anticipated that Policies within the NDP will help to ensure that community assets within the Parish are protected, and that sustainable future improvements to these services are supported. Although existing residents currently have limited access to health facilities, as the NDP does not propose new development a significant impact on local population and health can be objectively ruled out at this stage.

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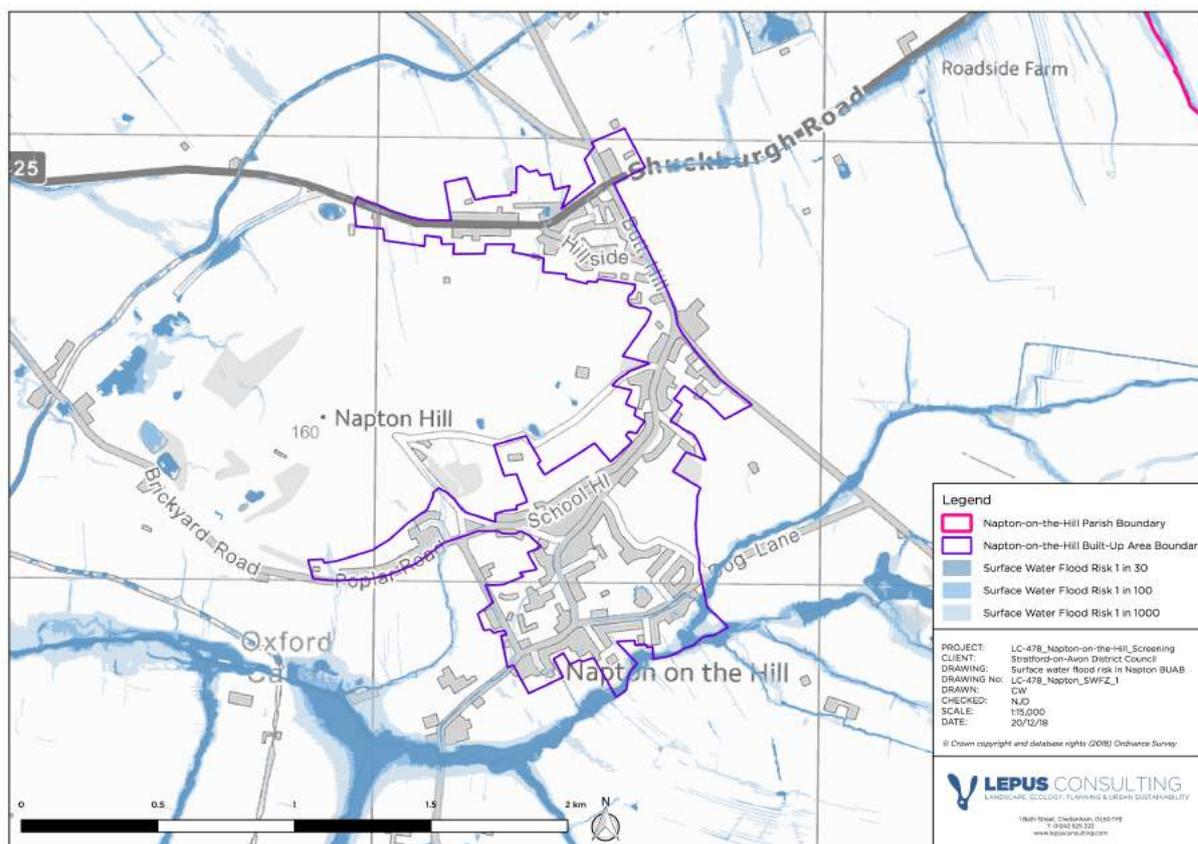
## 2.7 Transport and accessibility

- 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.
- 2.7.2 There are a limited number of services available within the Parish, as noted in **section 2.6** above. The public footpaths throughout the Parish are generally adequate to reach these amenities, however some areas have no pavements which potentially restricts accessibility for some residents, namely the elderly or young children.
- 2.7.3 St. Lawrence Church of England Primary School and the Arc School are both located in close proximity to existing residential areas. Secondary schools are available in the neighbouring villages of Southam and Priors Marston, which are accessible by bus.
- 2.7.4 There are two bus stops in the Parish providing regular services. The closest railway stations are located in Royal Leamington Spa, Long Buckby or Rugby, each approximately 16km away, providing direct rail links to London and Birmingham.
- 2.7.5 ‘Policy 1’ states that development must “*protect and enhance public rights of way and encourage the use of the existing network of public footpaths*”. ‘Policy 7’ notes the importance of providing or enhancing pedestrian access to the Grand Union and Oxford Canal towpath network.
- 2.7.6 Section 9 in the NDP notes a local desire to develop ‘traffic management’ measures. ‘Policy CS.26’ in the Core Strategy states that community initiatives combatting traffic issues may be supported. Therefore, the addition of a policy addressing local congestion and developing traffic management measures is recommended to help ensure sustainable development in the future.
- 2.7.7 Since the current NDP does not propose any development, a significant impact on local transport is not expected.

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## 2.8 Soil, water and air

- 2.8.1 The Parish covers Agricultural Land Class (ALC) Grade 3 and Grade 4 soil. The BUAB is situated on ALC Grade 4. As mentioned in **section 2.5** above, 'Policy 1' should help to ensure that new developments are only supported if they are located within the BUAB. Therefore, it is likely that any future development will not result in loss of any of the Parish's best and most versatile agricultural land.
- 2.8.2 'Objective 2' in the NDP indicates that future developments on brownfield sites will be supported. This will help to reduce the amount of ecologically and agriculturally important soil lost to new development.
- 2.8.3 The A425 passes through the north of the Parish. However, there are no recorded air quality issues identified in the NDP. 'Policy 5' should help to minimise future impacts on air quality by supporting development that *"incorporates design features that minimise the emission of air pollutants"*.
- 2.8.4 The entirety of the BUAB falls within Flood Zone 1, placing residents away from areas at high risk of flooding, however other parts of the Parish adjacent to the River Stowe are situated within Flood Zones 2 and 3. There are also some areas within the BUAB at risk of pluvial (surface water) flooding (see **Figure 2.4**). 'Policy 5' specifies that new developments must *"incorporate design features that minimise flood risk and encourages efficient water and waste management systems, including sustainable drainage systems (SuDS)"*. This Policy will help to ensure any future developments address the risk of fluvial and pluvial flooding and locate new residents away from these areas.
- 2.8.5 At present, it is considered unlikely that any future developments will result in significant adverse impacts on soil, air or water resources of the Neighbourhood Area as a result of the NDP.



**Figure 2.4:** Surface water flood risk in Napton BUAB and surrounding area (source: Environment Agency).

## 2.9 Climatic factors

2.9.1 ‘Policy 5’ states that “*proposal for community-led small-scale renewable or low carbon energy development will be supported, providing there are no adverse impacts on the local environment that cannot be adequately mitigated*”. ‘Policy 5’ also notes that “*opportunities for reuse and recycling*” will be maximised. Furthermore, ‘Policy 4’ specifies that new businesses will only be supported if the “*impact in terms of traffic, noise, air pollution, light pollution, ecology and landscape is satisfactory including through the use of appropriate mitigation measures*”. These Policies will help to ensure that any future developments are environmentally sustainable, and do not result in significant exacerbation of climate change.

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2.9.2 Although there are some bus services in Napton, residents are limited in terms of sustainable transport options, and as such are heavily reliant on cars for access to services, facilities, and employment (see **section 2.7**). Any future developments could therefore potentially result in an increase in pollutants associated with vehicles, although this increase will likely have an insignificant effect on the environment in light of the Policies mentioned above, and in **section 2.8**.

2.9.3 Overall the NDP presents a vision for Napton where climate change and a low-carbon future is a priority ('Objective 4'). It is therefore likely that the impact of future development on climate change will be minimal.

## 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 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 13' indicates support for proposals that make improvements to the broadband and mobile phone network, which may benefit residents choosing to work from home as well as local businesses.

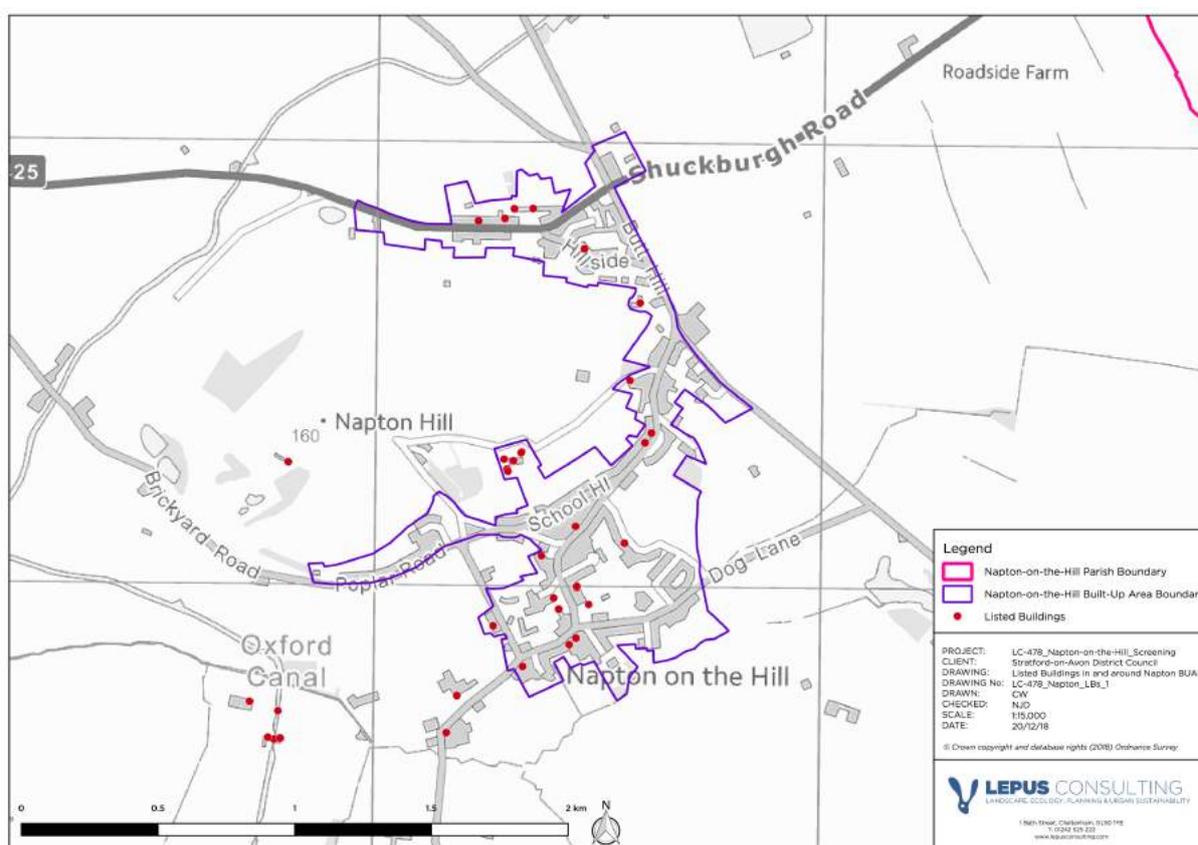
2.10.3 As mentioned in **section 2.6** above, 'Policy 12' states that the existing social infrastructure in the Parish will be retained or expanded and will therefore potentially help contribute towards community sustainability.

2.10.4 It is considered unlikely that the NDP will have significant adverse impacts on material assets within the Neighbourhood Area.

## 2.11 Cultural heritage

2.11.1 There are 41 Listed Buildings located within the Parish, the majority of which are shown in **Figure 2.5**. The Church of St Lawrence is a Grade II\* Listed Building, and the remaining 40 are Grade II Listed Buildings. 'Policy 6' states that any development proposal will only be supported if it "preserves or enhances designated heritage assets and their setting". This Policy should therefore help to ensure the continued protection of these Listed Buildings, in light of any future development.

2.11.2 There is remaining ancient 'ridge and furrow' pastureland found at the junction of The Poplars, The Butts and Howcombe Lane, adjacent to the BUAB. 'Policy 10' lists a number of features that will be protected from any development outside the BUAB. These include heritage assets and sites of archaeological interest. Furthermore, 'Policy CS.8' of the Core Strategy states that the District's historic environment will be protected and enhanced, and it is expected that the NDP is in conformity with this policy. It is therefore unlikely that any future development will negatively impact features of cultural heritage importance located within Napton.



**Figure 2.5:** Location of Listed Buildings within Napton BUAB and surrounding area (source: Historic England).

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## 2.12 Landscape

- 2.12.1 According to a Special Landscape Areas Study<sup>11</sup> for the Stratford-on-Avon District in 2012, Napton is located within the 'Ironstone Hill Fringe' Special Landscape Area. Furthermore, a Landscape Sensitivity Study<sup>12</sup> has determined that some areas within the BUAB are of 'high' or 'high/medium' sensitivity to housing. The study states that these areas are inappropriate for development, and as such this should be considered when locations are determined for any future development, even if they are within the BUAB. This includes areas classified as 'N03', 'N04' and 'N06' in **Figure 2.6**.
- 2.12.2 A detailed character assessment has been undertaken during the preparation of the NDP, determining key characteristics and important features of the neighbourhood area. 'Policy 9' lists a number of 'important views' which are to be protected, indicated in 'Policy Map 3' of the NDP (see **Figure 2.7**). 'Policy 9' states that "*development proposals which have a harmful impact on the view will not be supported*". 'Policy 10' states that development outside the BUAB must not harm the "*intrinsic character, beauty and tranquillity of the countryside*", and 'Policy 1' notes the importance of retaining gaps and open spaces amongst development. These policies will help to ensure that any future developments will be in keeping with the current openness of the Parish, and the setting of key features of Napton are preserved and protected.
- 2.12.3 As expected for a rural Parish, residents of Napton enjoy good access to the surrounding open countryside. There is an extensive PRoW network, including the Millennium Way, in addition to the canal towpaths with the Oxford Canal Walk and the Grand Union Canal Walk both radiating from Napton. As noted in **section 2.7**, 'Policy 1' and 'Policy 7' will help to ensure the protection and enhancement of these pedestrian networks. It is considered unlikely that any footpaths will be lost or views impacted by future development within the BUAB.

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<sup>11</sup> White Consultants (2012) Stratford-on-Avon District Special Landscape Area Study. Available at: <https://www.stratford.gov.uk/doc/205823/name/ED4112%20Special%20Landscape%20Areas%20Study%20June%202012.pdf> [Date Accessed: 11/12/18]

<sup>12</sup> White Consultants (2012) Stratford-on-Avon District. Landscape Sensitivity Assessment for Villages (Volume 2). Available at: <https://democracy.stratford.gov.uk/mgConvert2PDF.aspx?ID=18890> [Date Accessed: 19/12/18]

2.12.4 Due to the lack of any site allocations in the NDP, and taking into consideration those policies noted above, a significant impact on the local landscape can be objectively ruled out at this stage.

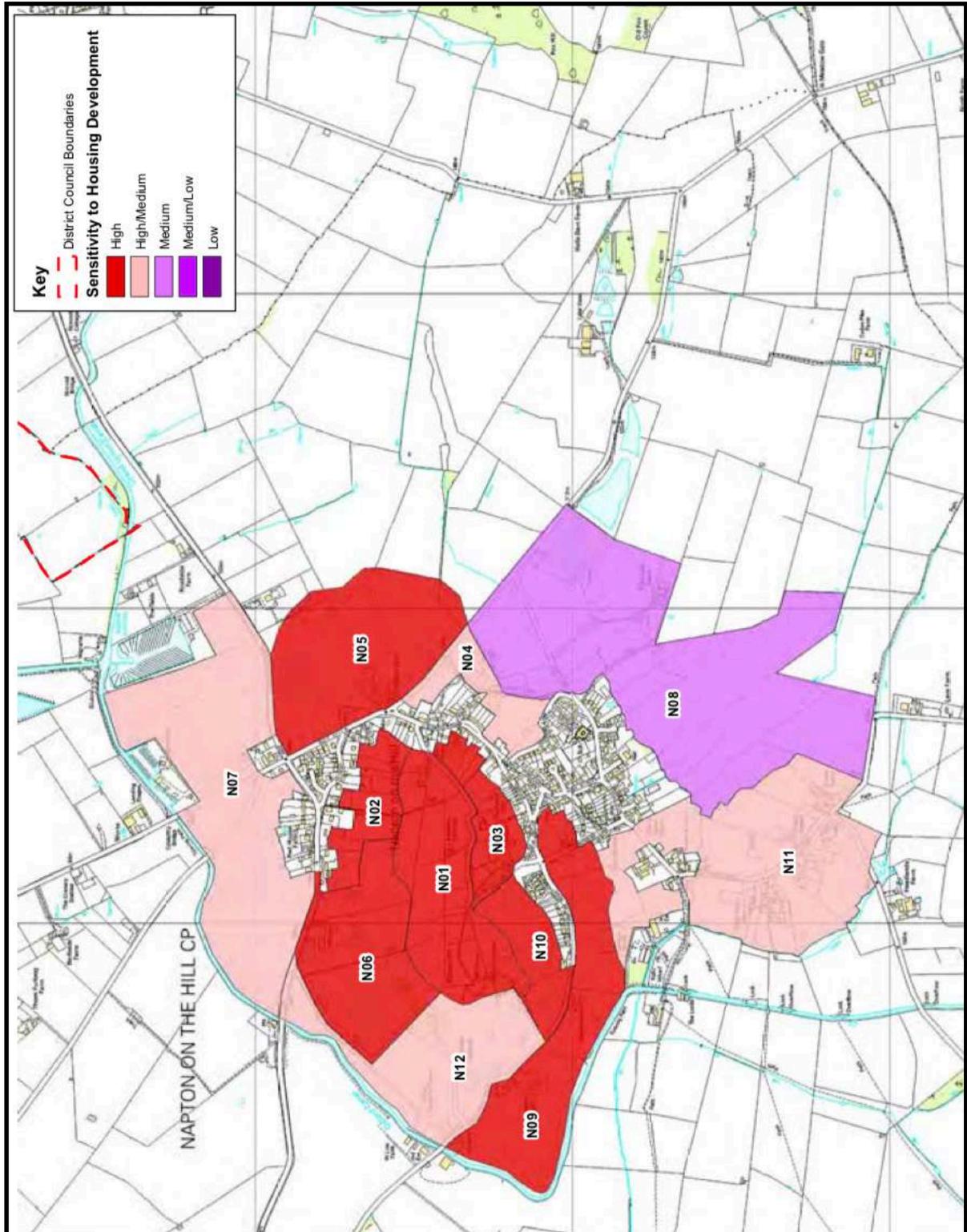


Figure 2.6: Napton landscape sensitivity to housing development (source: White Consultants).

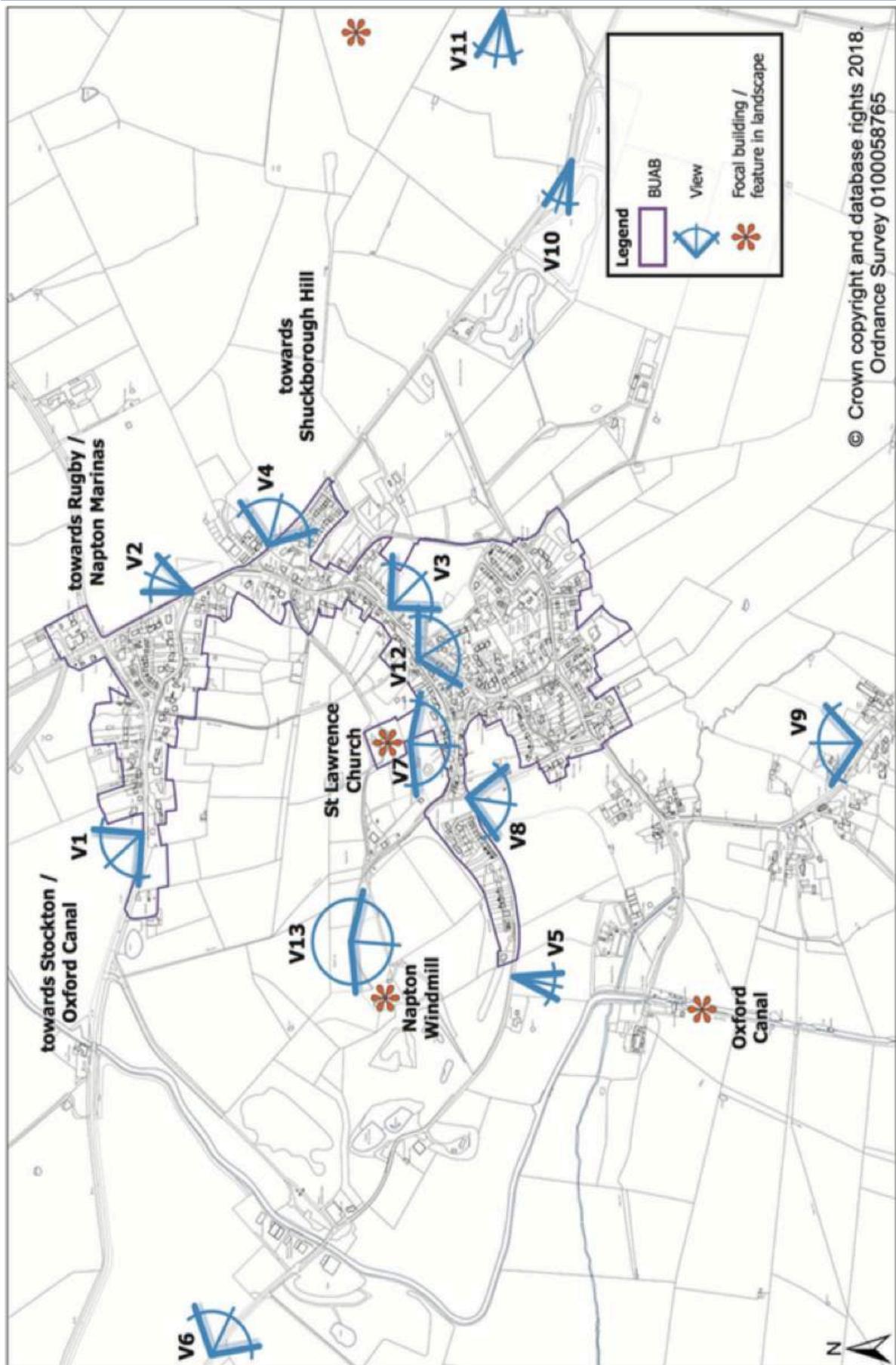


Figure 2.7: Important Views which have been identified in the NDP (source: NDP).

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## 3 HRA Screening Process

### 3.1 Habitats Regulations Assessment screening

3.1.1 HRA screening is a requirement of Regulation 105 of the Conservation of Habitats and Species Regulations 2017<sup>13</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>14</sup> and the Birds Directive<sup>15</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 Napton Parish is 'Upper Nene Valley Gravel Pits' Ramsar Site, which is located over 50km away. Due to this distance and the nature of the policies contained within the NDP, there is unlikely to be any impact on this Ramsar site. Based on the available information, a significant impact of the NDP on any Natura 2000 site can therefore objectively be ruled out at this stage.

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<sup>13</sup> Conservation of Habitats and Species Regulations 2017. Available at: <http://www.legislation.gov.uk/uksi/2017/1012/regulation/105/made> [Date Accessed: 19/12/18]

<sup>14</sup> EU Council Directive 92/43/EEC on the Conservation of natural habitats and of wild fauna and flora

<sup>15</sup> EU Council Directive 2009/147/EC on the Conservation of wild birds

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## 4 Conclusions

### 4.1 SEA Screening outcome

4.1.1 This screening report has explored the potential effects of the proposed Napton 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 are considered to be unlikely to occur as a result of the NDP.

4.1.3 It is recommended that the Napton NDP should **not** be screened into the SEA process.

### 4.2 HRA Screening outcome

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

4.2.2 It is recommended that the Napton NDP should **not** be screened into the HRA process.

### 4.3 Consultation

4.3.1 This report has been subject to consultations with Natural England, Environment Agency and Historic England. Their comments are presented in **Appendix B**.

# Appendix A: Napton-on-the-Hill NDP Policies

Objectives	Policy Number	Policy Name
<b>Housing</b>		
1. To support appropriate residential development within the village, including homes to meet the identified local need.	Policy 1	Residential Development
	Policy 2	Affordable Housing on Rural Exception Sites
	Policy 3	Self-Build Homes
2. To support appropriate development on brownfield land.	N/A	Statement on the former Napton Brickworks Site, Chapter 3 of NDP.
<b>Economy</b>		
3. To promote and enhance local business opportunities to support a vibrant rural economy.	Policy 4	Business Development
<b>Environmental Quality</b>		
4. To address climate change and support a low carbon future.	Policy 5	Environmental Quality
<b>Historic Environment</b>		
5. To value and protect local heritage features and historic buildings.	Policy 6	Heritage Assets
	Policy 7	The Grand Union and Oxford Canals
<b>Natural Environment</b>		
6. To value and protect the natural environment and the surrounding rural landscape.	Policy 8	Local Green Space
	Policy 9	Important Views
	Policy 10	Open Countryside
	Policy 11	Trees and Hedgerows
<b>Services and Facilities</b>		
7. To maintain and develop a range of services and facilities to support the needs of the local community.	Policy 12	Local Services and Community Facilities
	Policy 13	Telecommunications Infrastructure

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# Appendix B: Consultation Responses



Historic England

WEST MIDLANDS OFFICE

Ms Catherine Wright

Direct Dial: 0121 625 6887

Lepus Consulting Ltd.

1 Bath Street

Our ref: PL00528363

Cheltenham

GL50 1YE

10 January 2019

Dear Ms Wright

**BEAUDESERT AND HENLEY-IN-ARDEN; BEARLEY; NAPTON-ON-THE-HILL;  
AND CLIFFORD CHAMBERS AND MILCOTE NEIGHBOURHOOD PLANS- SEA  
AND HRA SCREENING**

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

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 **not** required. Regarding HRA Historic England does not disagree with your conclusions but would defer to the opinions of the other statutory consultees.

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/>](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.



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TF

Telephone 0121 625 6870  
HistoricEngland.org.uk





Historic England

WEST MIDLANDS OFFICE

Yours sincerely,

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Historic Places Advisor  
[peter.boland@HistoricEngland.org.uk](mailto:peter.boland@HistoricEngland.org.uk)

cc:



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[HistoricEngland.org.uk](http://HistoricEngland.org.uk)



*Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.*

Date: 11 January 2019  
Our ref: 269460  
Your ref: Napton-on-the-Hill SEA and HRA Screening



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**BY EMAIL ONLY**

[catherine.wright@lepusconsulting.com](mailto:catherine.wright@lepusconsulting.com)

T 0300 060 3900

Dear Ms Wright,

**SEA and HRA Screening of Napton-on-the-Hill's Neighbourhood Development Plan**

Thank you for your consultation on the above dated 7<sup>th</sup> January 2019 which was received by Natural England on the same day.

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 'significant effects on the environment are considered to be unlikely to occur'.

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](#).

**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:

- Upper Nene Valley Gravel Pits Ramsar Site - located over 50km away.

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 new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely

Victoria Kirkham  
Consultations Team

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

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

**Your ref:**

**Date:** 18 February 2019

Dear Sir/Madam

### **NAPTON-ON-THE-HILL SEA AND HRA SCREENING**

Thank you for referring the above Screening Report undertaken by Lepus Consulting dated January 2019.

The Environment Agency concurs with the conclusions of the screening report in that there will be no likely significant impacts of the plan that require assessing as part of the SEA.

Yours faithfully

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

Direct dial 020 3025 3006

Direct fax 01543 444161

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

Ecological Services

Green Infrastructure

Landscape and Visual Impact Assessment

Landscape Character Assessment

Habitats Regulations Assessment

Strategic Environmental Assessment

Sustainability Appraisal



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