



North Claines
Parish Council

North Claines Neighbourhood Plan

Strategic Environmental Assessment

Environmental Report

March 2016

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North Claines Neighbourhood Plan

Strategic Environmental Assessment

Environmental Report

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NON TECHNICAL SUMMARY

Introduction

- 0.1 This is the non-technical summary of the Environmental Report for the North Claines Neighbourhood Plan (NCNP). It describes how the Strategic Environmental Assessment (SEA) process was used to assist in the preparation of the NCNP, and has been produced in compliance with the SEA Regulations¹ and as required by the SEA Directive². The purpose of the Environmental Report is to identify, evaluate and present information on the likely significant effects of the Plan. It also allows the consultation bodies, the public and any other interested parties the opportunity to offer views on the SEA.

The Draft North Claines Neighbourhood Plan (NCNP)

- 0.2 The purpose of neighbourhood planning is to give local communities an opportunity to develop a shared vision for their neighbourhood and shape the development and growth of their area³. North Claines Parish Council resolved to progress with the production of a Neighbourhood Plan in July 2012. The application for the designation of the Parish as a Neighbourhood Plan Area was approved by Wychavon District Council in May 2013. The Parish Council set up a Neighbourhood Planning Committee (NPC) in January 2013 with the task of overseeing the neighbourhood plan process and producing the NCNP on behalf of the community and the Parish Council.
- 0.3 A neighbourhood plan must be in general conformity with higher level planning policy, which includes national policy set out through the National Planning Policy Framework. In this case, the local policy is the adopted South Worcestershire Development Plan (SWDP). The Neighbourhood Plan once adopted, will become part of the higher level Local Plan and the policies contained within them are then used in the determination of planning applications.
- 0.4 The NCNP sets out a vision for the Neighbourhood Plan Area (NPA) for the period 2015 - 2030, which aligns with the timescales proposed in the emerging SWDP. The Vision is as follows:

"A diverse and thriving NPA with Fernhill Heath providing many of the key services, facilities and infrastructure to meet the needs of the local community; new development incorporated into its setting retaining and reflecting the Area's unique and distinctive character, and opportunities provided to allow residents to enjoy the countryside which will be protected from inappropriate development".

¹ The Environmental Assessment of Plans and Programmes Regulations 2004 SI No. 1633

² Directive 2001/42EC of the European Parliament and of the Council on the Assessment of the Effects of Certain Plans and Programmes on the Environment.

³ NPPG

- 0.5 To achieve this Vision the NCNP identifies the following objectives:
1. Ensure future housing provision meets local housing need for both the market and social sector and new housing integrates appropriately within its setting and with existing infrastructure and utilities.
 2. Create, strengthen and support a Village Centre within Fernhill Heath to provide key services and facilities to meet some of the everyday needs of the local community.
 3. Create opportunities to promote local employment through appropriate small scale development and conversion.
 4. Ensure new development is designed to retain and reflect the NPA's unique and distinctive characteristics and incorporate high levels of environmental sustainability.
 5. Strengthen and upgrade the transport infrastructure with improvements to public transport provision, cycling provision and to the road network where it provides benefits to safety, residential amenity and sustainable travel.
 6. Strengthen and upgrade local infrastructure and services – physical, social and environmental – to meet the demand from new development.
 7. Recognise the heritage assets within the NPA and ensure that new development protects and enriches the historic townscape and landscape.
 8. Protect and enhance the NPA's nature conservation assets and local green spaces.
 9. Strengthen and support opportunities to access, utilise and enjoy the countryside within the NPA.
 10. Create safe, secure and low crime communities and protect and enhance health and wellbeing amongst the community.
- 0.6 The Plan proposes small scale development within the NPA and policies to be used in the determination of planning applications.

Strategic Environmental Assessment (SEA)

- 0.7 In order for a Neighbourhood Plan to be legally compliant a number of basic conditions need to met⁴. One of these basic conditions is whether the Plan is compatible with European Union obligations, which includes Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (often referred to as the Strategic Environmental Assessment (SEA) Directive)⁵.
- 0.8 The objective of the SEA Directive (set out in Article 1), is to provide 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

⁴ Localism Act 2011.

⁵ EU Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment. Available online: <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32001L0042>

sustainable development. It does this by requiring that an environmental assessment is carried out on plans and programmes that are likely to have significant effects on the environment. The Environmental Assessment of Plans and Programmes Regulations 2004⁶ [the SEA Regulations] transpose the requirements of the SEA Directive into UK law.

- 0.9 SEA considers the effects of the plan on the environment at the strategic level and sets the context for subsequent project level Environment Impact Assessment (EIA). It aims to predict and evaluate any significant effects of the plan, including the effects of potential alternatives, and to propose appropriate mitigation measures where necessary. SEA also includes the identification of measures to monitor the progress of the plan following adoption and implementation.
- 0.10 Government guidance⁷ outlines a number of stages that are required in undertaking a SEA and which will need to be carried out as a Neighbourhood Plan is being prepared. These stages are presented below.

Stage A: Setting Context & Scope

Stage B: Developing Options & Assessing Effects

Stage C: Preparing the Environmental Report

Stage D: Consulting on the Plan & the Environmental Report

Stage E: Monitoring Implementation of the Plan

- 0.11 The SEA of the NCNP has been prepared in accordance with this requirement for SEA.

Environmental Context and Objectives

- 0.12 A SEA scoping process was undertaken to help ensure that the SEA covers the key environmental issues that are relevant to the Neighbourhood Plan Area (NPA). An SEA Scoping Report was prepared to summarise the findings of the scoping process and was sent to statutory consultees for consultation in August 2015. Responses were received and informed the Final SEA Scoping Report, which is provided as an Appendix to the main Environmental Report. As part of the scoping process plans and programmes were reviewed and information was collated relating to the current and predicted environmental characteristics of the Neighbourhood Plan Area.
- 0.13 The key plans and programmes reviewed included the National Planning Policy Framework (NPPF) and the adopted South Worcestershire Development Plan (SWDP). The Neighbourhood Plan needs to be in conformity with the planning policies contained within these higher level documents. The review of plans and programmes is

⁶ The Environmental Assessment of Plans and Programmes Regulations 2004. Available online: <http://www.legislation.gov.uk/ukxi/2004/1633/contents/made>

⁷ National Planning Practice Guidance: Strategic environmental assessment and sustainability appraisal

provided in Section 3 of the Environmental Report as well as the Final Scoping Report, which is appended to the main Environmental Report.

- 0.14 The SEA Directive further requires the collation of baseline information to provide a background to, and evidence base for, identifying sustainability problems and opportunities in the NPA and providing the basis for predicting and monitoring effects of the NCNP. The baseline information and its evolution without the implementation of the Plan are provided in Section 3 of the Environmental Report as well as the Final Scoping Report, which is appended to the main Environmental Report.

Key Environmental Issues

- 0.15 The review of plans and programmes and baseline information identified at Scoping, and responses received from statutory consultees during Screening and Scoping, informed the identification of key environmental issues for the Neighbourhood Plan Area; these are set out below:
- **Changing population** - significant increases in the number of adults over 65 and children aged 5 to 15 years will change requirements for housing accommodation and increase pressure on residential care, health care and education provision and other amenities and services.
 - **High levels of commuting and reliance on the private car** - lack of employment within the Plan area itself and opportunities to improve access to sustainable transport modes and links to the employment areas in the north of Worcester City. Opportunities to provide greater employment opportunities within the Plan area and improve access to sustainable transport.
 - **Transport infrastructure** - the public have raised concerns through consultation on the emerging Neighbourhood Plan with regard to the impacts of further development on the highways network and the improvements needed to transport infrastructure, including footpaths/cycleways.
 - **Designated biodiversity** - of local importance within the Plan area and national importance in close proximity. In response to the Screening Opinion (March 2015) NE stated that the key site that could be potentially affected by the Neighbourhood Plan is the Northwick Marsh SSSI. Opportunities to enhance habitats, in particular connectivity between functioning habitats.
 - **Rural Landscape Character** - the public have raised concerns through consultation on the emerging Neighbourhood Plan with regard to the loss of countryside and the need to retain the rural identity and character of the Plan area.
 - **Designated heritage assets** - within and surrounding the Plan area, including Conservation Areas and Listed Buildings. The public have raised concerns through consultation on the emerging Neighbourhood Plan with regard to the potential impacts of further

development on the historic setting of the Plan area. Opportunities to improve access and signage to heritage assets where possible.

- **Best and most versatile agricultural land** - is present within the Plan area and should be protected where possible.
- **Flood Risk** - areas within the Plan area should be avoided and flood risk reduced and mitigated where necessary.
- **Increased pressure on water resources and wastewater treatment capacity** - which could have implications for water levels and quality.

How has the North Claines Neighbourhood Plan been assessed?

0.16 A SEA Framework was developed and included SEA Objectives that aim to resolve the key environmental issues and problems identified for the Plan area. This SEA Framework, together with the baseline information, comprised the basis for assessment, and is summarised in Table below.

Table 0.1: The SEA Framework

SEA Objective		Decision Aiding Questions Does the Neighbourhood Plan ...?
1	To meet the needs of current and future residents <ul style="list-style-type: none"> ■ SEA Topics: population, human health ■ NPPF Paras: 14, 16, 17, 50, 54, 55 & 162 ■ Relevant SWDP SA/SEA Objectives: 2, 3 & 8 	<ul style="list-style-type: none"> ■ Ensure that all residents have access to appropriate and affordable housing? ■ Ensure the timely delivery of infrastructure that meets the needs of new and existing development? ■ Ensure provision of community facilities (cultural, health, social, education, recreation) to meet residents needs?
2	To minimise impacts on the highways network reduce the need to travel <ul style="list-style-type: none"> ■ SEA Topics: population, human health, air, material assets & climatic factors ■ NPPF Paras: 29 - 46 ■ Relevant SWDP SA/SEA Objectives: 7, 9 & 13 	<ul style="list-style-type: none"> ■ Seek to improve access to sustainable transport modes, including walking and cycling routes? ■ Seek to improve employment opportunities within the Plan area? ■ Seek to improve the sustainable transport links within the Plan area as well as to employment opportunities and services/facilities in the north of Worcester City? ■ Ensure that the impacts of further development on the highways network are minimised and appropriate mitigation provided where necessary?
3	To protect and enhance biodiversity <ul style="list-style-type: none"> ■ SEA Topics: biodiversity, flora & fauna ■ NPPF Paras: 109 -125 	<ul style="list-style-type: none"> ■ Protect and enhance locally and nationally designated biodiversity sites within the influence of the Plan? ■ Protect and enhance important habitats and species where

	<ul style="list-style-type: none"> Relevant SWDP SA/SEA Objective: 10 	<p>possible?</p> <ul style="list-style-type: none"> Protect and enhance habitat connectivity where possible?
4	<p>To protect, enhance and manage the character of the landscape</p> <ul style="list-style-type: none"> SEA Topic: Landscape NPPF Paras: 109 -125 Relevant SWDP SA/SEA Objective: 11 	<ul style="list-style-type: none"> Protect and enhance the rural character of the Plan area? Protect the Green Belt and reduce the potential for coalescence? Protect and enhance the townscape and setting of settlements within the Plan area?
5	<p>To conserve and enhance the historic environment , heritage assets and their settings</p> <ul style="list-style-type: none"> SEA Topic: Cultural heritage NPPF Paras: 126 -141 Relevant SWDP SA/SEA Objective: 12 	<ul style="list-style-type: none"> Conserve and/or enhance heritage assets and the historic environment? Improve the quality of the historic environment? Provide for increased access to and enjoyment of the historic environment?
6	<p>To protect and enhance soils</p> <ul style="list-style-type: none"> SEA Topic: Soil NPPF Paras: 109 & 112 Relevant SWDP SA/SEA Objective: 13 	<ul style="list-style-type: none"> Seek to use poorer quality land in preference to that of higher quality, in particular best and most versatile agricultural land? Encourage enhanced local food production and security?
7	<p>To reduce and manage flood risk</p> <ul style="list-style-type: none"> SEA Topic: Water & climatic factors NPPF Paras: 94, 99 - 104 Relevant SWDP SA/SEA Objective: 14 	<ul style="list-style-type: none"> Ensure that development is directed away from areas of high flood risk? Ensure that development does not increase flood risk elsewhere? Seek the incorporation of sustainable drainage measures where possible?
8	<p>To protect and enhance the water environment</p> <ul style="list-style-type: none"> SEA Topic: Water NPPF Paras: 94, 99, 109 & 162 Relevant SWDP SA/SEA Objective: 14 	<ul style="list-style-type: none"> Encourage the efficient use of water? Seek to protect and enhance water quality where possible?

What reasonable alternatives have been considered and assessed?

- 0.17 The overall level and distribution of growth within the NPA has already been established at a higher level of plan-making through the SWDP. All reasonable alternatives for the level and distribution of growth were considered and appraised through the Sustainability Appraisal (incorporating SEA) process for the SWDP. This includes all reasonable site options that could potentially accommodate housing development within the NPA.

- 0.18 The location needs of a rail based park and ride site are inherently a rail line and the strategic highway network. The site identified in the plan is the only reasonable location and no others are considered feasible within the NPA.

What are the likely significant effects of the Draft North Claines Neighbourhood Plan?

- 0.19 The SEA of the Draft NCNP found that the vision & objectives, policies and proposed allocations have the potential for both positive and negative effects. A summary of the findings are provided in the table below.

Table 0.2: Significant Positive and Negative Effects

SEA Objective		Likely Significant Positive Effects	Likely Significant Negative Effects
1	To meet the needs of current and future residents	The delivery of housing to meet local needs, including affordable housing as well as the delivery of infrastructure improvements, including a new school has the potential for major long-term positive effects against this SEA Objective.	The assessment did not identify the potential for any negative effects against this SEA Objective.
2	To minimise impacts on the highways network and reduce the need to travel	The SEA found that there is the potential for minor positive effects against this SEA Objective through the delivery of development in accessible locations as well as the provision of a rail-based park & ride facility, which could help to reduce the use of the private vehicle. The Draft NCNP also proposes improvements to the public realm along transport corridors as well as improved cycle connections.	The SEA found that there is the potential for proposed development to increase traffic and out-commuting during the life of the Plan with the potential for a long-term negative effect. However, it was considered that the mitigation provided through Draft NCNP policies, including higher level SWDP policies, are sufficient to ensure that these negative effects will not be significant.
3	To protect and enhance biodiversity	The SEA acknowledged that there is the potential to enhance biodiversity through the delivery of new green space and improved ecological corridors; however, this was considered uncertain and dependent on the	The delivery of housing and infrastructure has the potential for negative effects against this SEA Objective through the loss and fragmentation of habitats as well as increased disturbance. The SEA found that there is sufficient mitigation provided through SWDP and Draft NCNP policies to ensure that there will not be any

		opportunities available at the project level.	significant negative effects on biodiversity.
4	To protect, enhance and manage the character of the landscape	The SEA did not identify the potential for any significant positive effects against this SEA Objective. The provision of new green open space and regeneration of brownfield land could have the potential for minor positive effects; however, this is uncertain at this stage.	The SEA found that there is the potential for the Draft NCNP to have long-term negative effects on the landscape through supporting development on greenfield sites and the potential loss of green space as well as Tree Preservation Orders, Ancient Woodlands and Hedgerows. The SEA also found that the development of the proposed rail based park and ride facility and education, health and community hub has the potential for negative effects as it would result in the loss of Green Belt land. It was determined that mitigation provided through Draft NCNP policies, including higher level SWDP policies, are sufficient to ensure that these negative effects will not be significant and that the rural landscape character of the Plan area will be retained. However, there is still likely to be residual minor long-term negative effects against this SEA Objective.
5	To conserve and enhance the historic environment, heritage assets and their settings	The SEA did not identify the potential for any significant positive effects against this SEA Objective. Development could improve access and signage to designated heritage assets as well as contribute to their management with the potential for minor positive effects; however, this is uncertain at this stage.	The SEA found that there is the potential for the Draft NCNP to have negative effects on the Fernhill Heath Local Heritage Area as well as the setting of Conservation Areas and locally important Historic Parks and Gardens. The SEA concluded that there is sufficient mitigation provided through SWDP and Draft NCNP policies to ensure that there will not be any significant negative effects on the historic environment.
6	To protect and enhance soils	The SEA did not identify the potential for any significant positive effects against this SEA Objective.	The SEA found that there is the potential for negative effects against this SEA Objective through the loss of agricultural land. The Draft NCNP supports development that could lead to the loss of best and most versatile agricultural land; however, overall it was concluded that there is likely to be a residual minor permanent negative effect against this SEA Objective.

7	To reduce and manage flood risk	The SEA did not identify the potential for any significant positive effects against this SEA Objective.	The Draft NCNP does not support or propose development in any areas of high flood risk. The SEA found that mitigation provided through Higher level SWDP policies are sufficient to ensure that there will be no significant negative effects, with the potential for a residual neutral effect.
8	To protect and enhance the water environment	The SEA did not identify the potential for any significant positive effects against this SEA Objective.	The SEA found that there is the potential for the Draft NCNP to increase demand on water resources as well as pressure on Waste Water Treatment Works. Based on the evidence available, including a detailed Water Cycle Study produced to inform the SWDP, the SEA concluded that the existing regulatory processes and policies contained in the SWDP will ensure that there will not be any significant negative effects on water resources or water quality as a result of development supported and proposed through the Draft NCNP.

How could negative effects be mitigated and positive effects enhanced?

0.20 Overall, the SEA found that there is sufficient mitigation provided through Draft NCNP policies as well as higher level SWDP policies to ensure that there will not be any significant negative effects as a result of implementing the Draft NCNP. The SEA proposed a number of recommendations to help strengthen the Draft NCNP and help address comments arising from statutory consultees. These included the following:

- Insert a reference to SSSIs within the supporting text of Policy NCLE6 (Local Nature Conservation Assets).
- Opportunities should be sought to provide accessible public open space within any proposals for housing development within or surrounding Fernhill Heath.
- Opportunities should be sought to improve access and signage to designated heritage assets where possible.
- Opportunities should be sought to enhance ecological corridors within and adjacent to the NPA.
- Changes to Policy NCLE3 (Local Heritage Assets) to ensure that it includes a reference to the setting of designated heritage assets.
- The requirement that any proposal for development considers flood risk, water efficiency and biodiversity as part of its design.

Do the changes to the Plan following consultation in Dec 2015 significantly affect the findings of the previous work?

- 0.21 The changes made to the Plan, including the deletion and addition of Policies, were considered and found to not significantly affect the findings of the previous assessment work carried out for the Draft NCNP.

Monitoring Proposals

- 0.22 The NCNP will be monitored and reviewed on an annual basis following its adoption by the Parish Council. There is a requirement to monitor the predictions made in the SEA and Government advises the preparation of a monitoring strategy that incorporates the needs of the two processes to make best use of shared information and resources. Monitoring proposals are suggested in the Environmental Report and will be progressed and refined, as a result of further assessment and consultation, as the NCNP progresses.

Summary and Next Steps

- 0.23 The SEA of the NCNP has assessed the effects of individual policies and development allocations as well as the overall effects of the Plan, including cumulative effects. The assessment has identified that the NCNP has the potential for a significant positive effect by helping to meet the needs of current and future residents through supporting development in the SWDP and identifying further areas for growth, if needed, as well as pursuing the delivery of a new school and infrastructure improvements. The assessment found that while there is the potential for negative effects on the environment, mitigation provided through NCNP policies as well as higher level SWDP policies are sufficient to ensure that these will not be significant.
- 0.24 The Submission NCNP and this Environmental Report will be submitted to Wychavon Council for consideration. If the Council is satisfied that the NCNP and accompanying documents meet the legislative requirements they will be published for consultation for a minimum of six weeks. Following consultation the Plan and accompanying documents will then be submitted for independent Examination.

1.0 Introduction

Purpose of the Environmental Report

- 1.1 This document has been prepared for North Claines Parish Council as part of the Strategic Environmental Assessment (SEA) of the North Claines Neighbourhood Plan (NCNP). It has been produced in compliance with the SEA Regulations⁸ and as required by the SEA Directive⁹. The purpose of the Environmental Report is to identify, evaluate and present information on the likely significant effects of the Plan. It also allows the consultation bodies, the public and any other interested parties the opportunity to offer views on the SEA.

The North Claines Neighbourhood Plan (NCNP)

- 1.2 The Localism Act (2011) introduced new permissive rights for local communities to prepare a neighbourhood plan. The purpose of neighbourhood planning is to give local communities direct power to develop a shared vision for their neighbourhood and shape the development and growth of their area¹⁰.
- 1.3 North Claines Parish Council resolved to progress with the production of a Neighbourhood Plan in July 2012. The application for the designation of the Parish as a Neighbourhood Plan Area was approved by Wychavon District Council in May 2013. The Parish Council set up a Neighbourhood Planning Committee (NPC) in January 2013 with the task of overseeing the neighbourhood plan process and producing the NCNP on behalf of the community and the Parish Council.
- 1.4 A neighbourhood plan must be in general conformity with higher level planning policy, which includes national policy set out through the National Planning Policy Framework. In this case, the local policy includes the policies within the adopted South Worcestershire Development Plan (SWDP). Once the Neighbourhood Plan is adopted, it will become part of the higher level Local Plan and the policies contained within them are then used in the determination of planning applications.
- 1.5 The NCNP sets out a vision for the NPA for the period 2010 – 2030, which aligns with the timescales proposed in the emerging SWDP. The Vision is as follows:

'A diverse and thriving NPA with Fernhill Heath providing many of the key services, facilities and infrastructure to meet the needs of the local community; new development incorporated into its setting retaining and reflecting the Area's unique and distinctive character, and

⁸ The Environmental Assessment of Plans and Programmes Regulations 2004 SI No. 1633

⁹ Directive 2001/42EC of the European Parliament and of the Council on the Assessment of the Effects of Certain Plans and Programmes on the Environment.

¹⁰ NPPG

opportunities provided to allow residents to enjoy the countryside which will be protected from inappropriate development'.

- 1.6 To achieve this Vision the NCPC identifies the following objectives:
1. Ensure future housing provision meets local housing need for both the market and social sector and new housing integrates appropriately within its setting and with existing infrastructure and utilities.
 2. Create, strengthen and support a Village Centre within Fernhill Heath to provide key services and facilities to meet some of the everyday needs of the local community.
 3. Create opportunities to promote local employment through appropriate small scale development and conversion.
 4. Ensure new development is designed to retain and reflect the NPA's unique and distinctive characteristics and incorporate high levels of environmental sustainability.
 5. Strengthen and upgrade the transport infrastructure with improvements to public transport provision, cycling provision and to the road network where it provides benefits to safety, residential amenity and sustainable travel.
 6. Strengthen and upgrade local infrastructure and services – physical, social and environmental – to meet the demand from new development.
 7. Recognise the heritage assets within the NPA and ensure that new development protects and enriches the historic townscape and landscape.
 8. Protect and enhance the NPA's nature conservation assets and local green spaces.
 9. Strengthen and support opportunities to access, utilise and enjoy the countryside within the NPA.
 10. Create safe, secure and low crime communities and protect and enhance health and wellbeing amongst the community.
- 1.7 The NCNP's strategy is based on sustainable and beneficial change to the environment and communities in the NPA. The strategy seeks to ensure that any proposed residential development is properly integrated into the NPA thereby maintaining its distinctive rural character and ensuring that there is appropriate infrastructure to support the growth in demand from the new population in the NPA. The NCNP proposes a number of policies to help realise the Vision, these relate to the provision of any new housing and employment as well as policies relating to transport, design, community, landscape and the environment.

Strategic Environmental Assessment

- 1.8 In order for a Neighbourhood Plan to be legally compliant a number of basic conditions need to met¹¹. One of these basic conditions is whether the Plan is compatible with European Union obligations, which includes Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (often referred to as the Strategic Environmental Assessment (SEA) Directive)¹².
- 1.9 The objective of the SEA Directive (set out in Article 1), is to provide 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 does this by requiring that an environmental assessment is carried out on plans and programmes that are likely to have significant effects on the environment. The Environmental Assessment of Plans and Programmes Regulations 2004¹³ [the SEA Regulations] transpose the requirements of the SEA Directive into UK law.
- 1.10 SEA considers the effects of the plan on the environment at the strategic level and sets the context for subsequent project level Environment Impact Assessment (EIA). It aims to predict and evaluate any significant effects of the plan, including the effects of potential alternatives, and to propose appropriate mitigation measures where necessary. SEA also includes the identification of measures to monitor the progress of the plan following adoption and implementation.
- 1.11 In order to determine if a Neighbourhood Plan is likely to have a significant environmental effect it must be assessed (screened) at an early stage of the plan's preparation according to the requirements set out in Regulation 9 of the SEA Regulations. A screening opinion of the emerging draft Neighbourhood Plan was produced by Wychavon District Council and sent to statutory consultees (Natural England, Historic England and the Environment Agency) for comment in March 2015. The screening found that the North Claines Draft Neighbourhood Plan is likely to have a significant environmental effect primarily as a result of the potential for development at Sling Lane/Old Drive as well as proposals for a combined education, health and community hub, and rail-based park and ride facility. Following the review of responses from statutory consultees it was determined that the North Claines Neighbourhood Plan will require a full SEA and an environmental report must be prepared in accordance with paragraphs (2) and (3) of Regulation 12 of the SEA Regulations.

¹¹ Localism Act 2011.

¹² EU Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment. Available online: <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32001L0042>

¹³ The Environmental Assessment of Plans and Programmes Regulations 2004. Available online: <http://www.legislation.gov.uk/ukxi/2004/1633/contents/made>

Structure of this Report

- 1.12 Following this introductory Section 1, this report is structured into five further sections:
- **Section 2** sets out the approach and methods for the SEA of the NCNP;
 - **Section 3** describes the environmental context for the SEA, including the objectives of other relevant plans and programmes, and the baseline characteristics of the area. It also sets out the key environmental issues and opportunities as well as the SEA Framework (details in Appendix I);
 - **Section 4** explains how alternatives are considered and assessed in plan-making and the SEA as well as sets out the overall findings of the SEA of the Draft NCNP;
 - **Section 5** considers the changes to the Plan following consultation on the Draft NCNP and how these affect the findings of the previous SEA work;.
 - **Section 6** sets out proposals for monitoring; and
 - **Section 7** outlines the next steps.

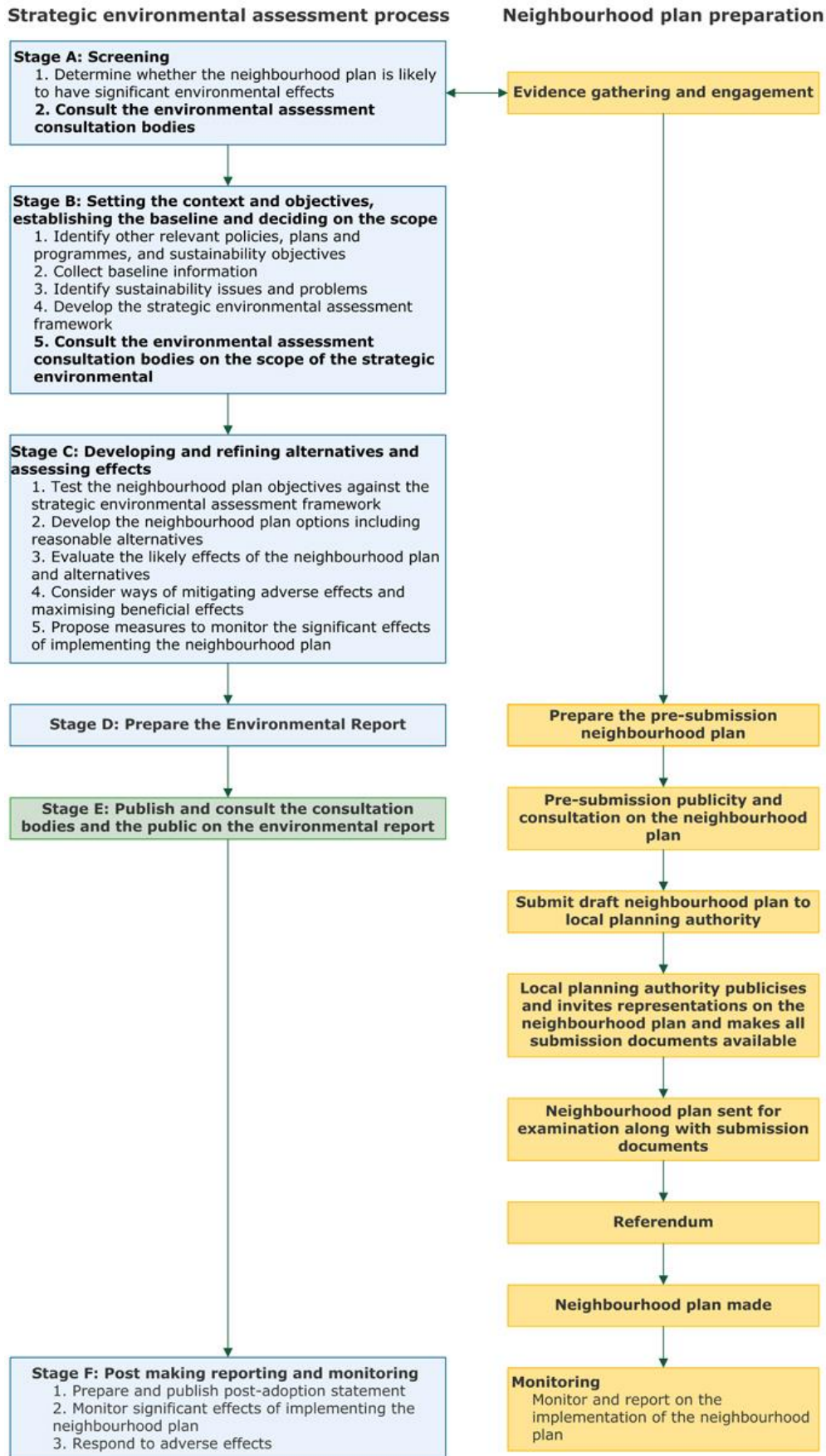
2.0 SEA Method

Introduction

- 2.1 Strategic Environmental Assessment is an iterative and ongoing process that aims to provide a high level of protection for the environment and contribute to the integration of environmental considerations into the preparation and adoption of Plans with a view to promoting sustainable development. SEA is an assessment tool that helps to inform decision-making but it is not the sole basis for a decision. The Parish Council will consider the findings of the SEA alongside the wider evidence base to inform the development of the emerging Plan.
- 2.2 There is a tiering of appraisal/assessment processes that align with the hierarchy of plans - from international, national and through to local. SEA sets the context for subsequent project level studies during Environmental Impact Assessment (EIA) for major development projects.
- 2.3 This tiering is acknowledged by the NPPF (2012) in paragraph 167 that states that *"Assessments should be proportionate and should not repeat policy assessment that has already been undertaken."* The South Worcestershire Development Plan is a strategic planning document that provides strategic policy and allocations to guide promoters, communities and the three Councils in their decisions regarding proposed development. The NCNP is a lower level planning document that is in conformity with the SWDP and national planning requirements. Where possible, the SEA process for the NCNP has tried to build upon and utilise the Sustainability Appraisal (SA)/ SEA work already carried out for the SWDP.
- 2.4 Government guidance¹⁴ outlines a number of stages that are required in undertaking a SEA and which will need to be carried out as a Neighbourhood Plan is being prepared. These stages are presented in the figure below.

¹⁴ National Planning Practice Guidance: Strategic environmental assessment and sustainability appraisal

Figure 2.1: SEA and Plan-Making Stages and Tasks



Source: National Planning Practice Guidance

Scoping (Stage B)

- 2.5 Scoping is an initial stage in the SEA process that compiles background information which is then used to identify key environmental issues. The key issues inform the development of objectives that are used in the later stages of the SEA to assess the effects of the plan.
- 2.6 A scoping process was undertaken during August 2015 to help ensure that the SEA covered the key environmental issues that are relevant to the NPA. This built on the SA/SEA work that has been carried out for the SWDP¹⁵. Key plans and programmes (PP) were reviewed and baseline information was gathered and analysed to help identify the key environmental issues, problems and opportunities for the area (further detailed in the following section 3).
- 2.7 A Framework of SEA Objectives and decision-aiding questions was developed from the key issues and opportunities identified. This framework aims to promote and/or protect environmental factors that are relevant to the NPA and its timescale for implementation in the period up to 2030. It forms the basis against which emerging elements of the Draft NCNP are assessed using the baseline information, other available evidence and professional judgment.
- 2.8 A Draft Scoping Report was sent to statutory consultees (Environment Agency, Natural England and Historic England) for comment from 11 August to 15 September 2015. The responses received are presented in Appendix I of this Environmental Report. Natural England and Historic England were happy with the content of the Scoping Report and stated that it contains sufficient detail and is suitably proportionate for the SEA of the North Claines Neighbourhood Plan. The Environment Agency re-submitted comments that were previously made in relation to the SEA Screening Opinion for the North Claines Neighbourhood Plan in March 2015. The responses received from statutory consultees were taken into account when finalising the Scoping Report presented in Appendix I of this Report. They have also be taken into account through the ongoing SEA of the Neighbourhood Plan.

Assessing the Draft North Claines Neighbourhood Plan and Alternatives (Stage C)

- 2.9 The SEA Framework presented in Table 3.1 formed the basis for appraising the Draft NCNP and any reasonable alternatives. The SEA of the Draft NCNP, including policies and any proposed site allocations, is structured according to the SEA Objectives, which are linked to topics in the SEA Directive, paragraphs in the NPPF and any relevant SA/SEA Objectives developed for the SA/SEA of the higher level SWDP.
- 2.10 An assessment commentary was provided under each of the SEA Objectives, which is divided into a number of sub-headings to ensure

¹⁵ <http://www.swdevelopmentplan.org/>

that each aspect of the emerging Plan is considered as well as the interrelationships between SEA Objectives/topics and cumulative effects of the Plan as a whole. This method allows the SEA to focus on the areas of the Draft NCNP that are likely to have significant effects and provide further detail. It also allows for the consideration of mitigation measures that may be provided.

- 2.11 The assessment was undertaken using professional judgment, supported by the baseline information and evidence for the NCNP, as well as any other relevant information sources available. The nature of the likely effects (including positive/negative, duration, permanent/temporary, secondary, cumulative and synergistic) are described, together with any uncertainty noted. Evidence is cited where applicable and suggestions for mitigation or enhancement made where relevant. SEA is informed by the best available information and data; however, data gaps and uncertainties exist and it is not always possible to accurately predict effects at a strategic level of assessment.
- 2.12 As a result of the consultation responses received on the Draft Plan, a number of changes have been made to the NCNP. It is important to ensure that any changes are screened through the SEA process to determine if they significantly affect the findings of the SEA presented in the Environmental Report (Oct 2015) and further appraisal work is required. A screening table was produced to consider all the key changes to policies. The summary findings of this work are presented in Section 5 with the detailed screening matrix provided in Appendix III of this Report.

The Environmental Report (Stage D)

- 2.13 The SEA Directive and Regulations requires the preparation of an Environmental Report that details the process, findings and consultation of the SEA process. It is the key output of the SEA, providing a detailed assessment of the potential effects of the draft plan or programme. This report is the Environmental Report in accordance with the SEA Directive and Regulations.

Uncertainties and data gaps

- 2.14 It is not always possible to accurately predict environmental effects when considering plans at a strategic scale. Impacts on biodiversity and cultural heritage, for example, will depend on more detailed information and studies at a site-level. Whilst climate change science is becoming more accurate, it is difficult to predict impacts likely to result from climate change, including synergistic effects. These uncertainties have been acknowledged in the assessments, baseline and other areas of this Environmental Report where applicable.

Consultation

- 2.15 The SEA Regulations require that consultation on the scope of the assessment should be undertaken with the statutory SEA consultation bodies (Natural England, Historic England and the Environment Agency). This was undertaken in August & September 2015 and the responses from the statutory consultation are presented in Appendix I of the Final Scoping Report, which is provided in Appendix I of this Environmental Report.
- 2.16 The SEA Directive/ Regulations also require that the public shall be given an early and effective opportunity within appropriate timeframes to express their opinion on the draft plan and accompanying Environmental Report before the adoption of the Plan. An Environmental Report accompanied the Draft NCNP on public consultation for 6 weeks from 06 November to 18 December 2015. The representations received and how they have been taken into account through the SEA process are presented in Appendix II of this Environmental Report.
- 2.17 This Environmental Report will be submitted to Wychavon Council for consideration alongside the Submission NCNP. If the Council is satisfied that the NCNP and accompanying documents meet the legislative requirements they will be published for consultation for a minimum of six weeks. Following consultation the Plan and accompanying documents will then be submitted for independent Examination.

3.0 Environmental Context and Objectives

Introduction

- 3.1 The SEA scoping process was undertaken and presented in the Final Scoping Report (Sept 2015), which is provided in Appendix I of this Environmental Report. Comments received from statutory bodies were taken into account and informed the progressive development of the SEA and the NCNP. This Section provides a summary of the baseline information and plans and programme review as well as the key environmental issues, problems, objectives and opportunities for development and spatial planning that were identified as a result of such studies.

Plans and Programmes Review

- 3.2 In order to establish a clear scope for the SEA of the North Claines Neighbourhood Plan, it is necessary (and a requirement of SEA) to review and develop an understanding of the wider range of plans and programmes that are relevant to the Plan. This includes International, European, National, Regional, and Local level policies, plans and strategies. Summarising the aspirations of other relevant policies, plans, programmes and sustainability objectives promotes systematic identification of the ways in which the Neighbourhood Plan could help fulfil them.
- 3.3 This task was undertaken for the Sustainability Appraisal (SA) incorporating SEA of the South Worcestershire Development Plan (SWDP), presented in Appendix 1 of the SA Scoping Report published in 2007¹⁶. This work was then updated in 2011 and 2012, with the most recent Plans and Programmes Review (PP Review) update presented in Appendix 9 of the Pre-Submission SA Report published in 2012¹⁷.
- 3.4 Government guidance¹⁸ states that the SEA of a Neighbourhood Plan, *"does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the neighbourhood plan"*. It is therefore not considered necessary to duplicate all the information provided in the Plans and Programmes Review for the SA of the SWDP.
- 3.5 A focused number of plans and programmes have been reviewed below, which are appropriate to the level of plan-making and reflect the work already carried out through the SA/SEA of the SWDP.

¹⁶ http://www.swdevelopmentplan.org/?page_id=254

¹⁷ Ibid.

¹⁸ National Planning Practice Guidance: Strategic environmental assessment and sustainability appraisal

The National Planning Policy Framework (2012)

- 3.6 The National Planning Policy Framework (NPPF) is the overarching policy framework for the delivery of sustainable development across England, and is underpinned by a presumption in favour of sustainable development. The NPPF must be taken into account in the preparation of local and neighbourhood plans. The purpose of the planning system is to contribute to the achievement of sustainable development. The National Planning Policy Framework¹⁹ (paragraph 7) states that:

"There are three dimensions to sustainable development - economic, social and environmental - which give rise to the need for the planning system to perform a number of roles".

- 3.7 These roles include meeting the needs (employment, housing and infrastructure) of the District as well as protecting and enhancing the environment. The NPPF (paragraph 8) states that:

"These roles should not be undertaken in isolation because they are mutually dependent".

- 3.8 The NPPF sets out twelve core land-use planning principles that should underpin both plan-making and decision-taking. One of these twelve principles state that planning should:

"be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. Plans should be kept up-to-date, and be based on joint working and co-operation to address larger than local issues. They should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency";

- 3.9 In para 184 the NPPF states that neighbourhood plans must be in general conformity with the strategic policies of the Local Plan, which in this case is the South Worcestershire Development Plan²⁰ (SWDP) adopted 25 February 2016. Neighbourhood Plans should reflect these policies and as well as plan positively to support them. Once a Neighbourhood Plan has demonstrated its general conformity with these policies and is brought into force, the policies it contains take precedence over existing non-strategic policies in the higher level Plans for that neighbourhood, where they are in conflict (Para 185 of the NPPF).
- 3.10 The North Claines Neighbourhood Plan should draw upon the NPPF, and reflect the national priorities for new development as well as be in conformity with the policies in the adopted SWDP.

¹⁹ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

²⁰ <http://www.swdevelopmentplan.org/>

South Worcestershire Development Plan

- 3.11 Wychavon District Council (WDC), along with Malvern Hills District Council (MHDC) and Worcester City Council (WCC) adopted the South Worcestershire Development Plan (SWDP) on 25 February 2016.
- 3.12 The SWDP proposes the delivery 28,400 new dwellings and 280 ha of employment land up to 2030 (Policy SWDP3) within the Plan area. It proposes that Wychavon District will accommodate 10,600 new dwellings and 120 ha of employment of this total overall level of growth. Policy SWDP 2 sets out the development strategy and settlement hierarchy, with Fernhill Heath identified (in Annex D of the SWDP) as a Category 2 village whose role is predominately aimed at meeting locally identified housing and employment needs. Category 2 villages are identified as being suited to accommodate market and affordable housing needs alongside limited employment for local needs.
- 3.13 Policy SWDP45 identifies six urban extensions one of which is referred to as Gwillam's Farm or Worcester North Urban Extension. This site lies to the south west of the NPA and the SWDP proposes the delivery of around 250 new dwellings. Policy SWDP 59 (New Housing for Villages) proposes the provision of 120 new dwellings at Dilmore Lane/ Station Road in Fernhill Heath (Ref (SWDP60/16).
- 3.14 The SWDP contains a variety of other policies that seek to minimise the impacts of proposed development and protect and enhance the landscape, open/green space (including green infrastructure), heritage, biodiversity, water, air and soils.

Baseline Information Summary

- 3.15 The SEA Directive requires the collation of baseline information to provide a background to, and evidence base for, identifying sustainability problems and opportunities in the NPA and providing the basis for predicting and monitoring effects of the North Claines Neighbourhood Plan. To make judgements about how the emerging content of the Neighbourhood Plan will progress or hinder sustainable development, it is essential to understand the economic, environmental and social circumstances in the Plan area today and their likely evolution in the future. The aim is to collect only relevant and sufficient data on the present and future state of the Plan area to allow the potential effects of the Neighbourhood Plan to be adequately predicted.
- 3.16 This task was undertaken for SA incorporating SEA of the South Worcestershire Development Plan (SWDP), presented in Appendix 2 of the SA Scoping Report published in 2007²¹. This work was then

²¹ http://www.swdevelopmentplan.org/?page_id=254

updated in 2011 and 2012, with the most recent Baseline Information update presented in Appendix 9 of the Pre-Submission SA Report published in 2012²².

- 3.17 The SEA Guidance provided by Government²³ proposes a practical approach to data collection, recognising that information may not yet be available and that information gaps for future improvements should be reported as well as the need to consider uncertainties in data. Collection of baseline information should be continuous as the SEA process guides plan making and as new information becomes available.
- 3.18 A summary of the key collated baseline information is provided below, which is appropriate to the level of plan-making and builds on the work already carried out through the SA/SEA of the SWDP.

Biodiversity, Flora & Fauna

- 3.19 The Neighbourhood Plan Area contains a number of locally important non-statutory designated sites for nature conservation, which includes the River Severn Local Wildlife Site (LWS) and Droitwich Canal LWS along with the River Severn Special Wildlife Site (SWS) and River Salwarpe SWS. The Plan area also contains a number of Biodiversity Action Plan priority habitats, including deciduous woodland, semi-improved grassland and woodpasture and parkland²⁴.
- 3.20 It should also be noted that there are nationally important designated sites within close proximity to the Neighbourhood Plan Area²⁵. These include Grimley Brick Pits Site of Special Scientific Interest (SSSI), which is in an unfavourable recovering condition²⁶ and is separated from the Plan area by the River Severn. It also includes the Northwick Marsh SSSI (currently in a favourable condition²⁷), which is adjacent to a small proportion of the Plan area in the south west.

Population & Health

- 3.21 The total population within Neighbourhood Plan area is 3,520²⁸ and there has been an increase of 13% in the resident population since 2001. This is a higher level of increase when compared to the District, which saw a 3.5% increase in population since 2001 and the West Midlands which had a population increase of 6.4%.

²² Ibid.

²³ Department for Communities and Local Government (2014) National Planning Practice Guidance - Strategic Environmental Assessment and Sustainability Appraisal. Online at <http://planningguidance.planningportal.gov.uk/blog/guidance/>

²⁴ DEFRA. Magic Map. Available online: <http://www.magic.gov.uk/>

²⁵ Ibid.

²⁶ NE – Designated Sites. Available online: <https://designatedsites.naturalengland.org.uk/>

²⁷ Ibid.

²⁸ 2011 Census

- 3.22 Since 2001, there have been significant increases in the number of pensionable adults (33.4%) with a small increase in the number of adults ages 25 to 44 (3.6%). There has also been a 15% increase for the 0 to 24 age group with a 21% increase in the 5 to 15 age group. There has been a smaller increase in the number of working age adults compared to children and young adults and pensionable adults²⁹. This follows national population trends that illustrate an ageing population.
- 3.23 The population of the Neighbourhood Plan area is predominantly white British (95.6%), with the remaining population a mix of ethnicities including white non-British, Asian, black and other ethnic groups.
- 3.24 The principle village in the Neighbourhood Plan area is Fernhill Heath, which has a population of 3,256 and represents 92.5% of the population within the Plan area. The remainder of the population live in the hamlets of Bevere, Lower Town and Hawford and isolated farmsteads. Fernhill Heath Village is predominantly residential although it contains a small level of amenities including a first school and two private schools.
- 3.25 There is a higher proportion of economically active people in the Neighbourhood Plan area than in Wychavon and the West Midlands. Slightly higher levels of residents work full time than in Wychavon and the West Midlands with part time workers being slightly higher again. However, despite there being relatively high levels of economically active residents there are limited opportunities for employment within the Plan area.
- 3.26 47.9% of the population within the Plan area travel less than 10km to get to work, which is higher than the District at 40.5% but lower than the Region at 55.1%. A lower percentage of the population within the Plan area (17%) travel between 10km to 30km to get to work compared to the District (25.8%) and Region (20.4%). However, a higher percentage of the population within the Plan area (14.3%) travel to work over 30km compared to the District (10.9%) and Region (7.1%)³⁰. It is also important to note that more people in the Neighbourhood Plan area travel to work using a private vehicle (79.8%) compared to the District (76.2%) and Region (71.1%)³¹.
- 3.27 Indices of Multiple Deprivation (IMD) show that overall, the Plan area (which falls within two lower layer super output areas – 006A & 006B) is not deprived and is better than 80% of all other areas in England³². Compared to the nation the indices show the following:
- Income Deprivation - better than 70% of areas in England
 - Employment - better than 80% of areas in England
 - Health - better than 90% of areas in England.

²⁹ Ibid.

³⁰ Ibid.

³¹ Ibid.

³² DCLG - Indices of Multiple Deprivation

- Education - better than 70% of areas of England
- Barriers to Services - better than 20% of areas of England
- Living Environment - better than 80% of areas of England
- Crime - better than 80% of areas of England.

Soil

- 3.28 The majority of land within the Plan area is agricultural comprising of arable land with some pasture for grazing. It is predominantly Grade 3 agricultural land with four areas of Grade 2 land, which is considered best and most versatile agricultural land by the NPPF. There is small area of Grade 4 agricultural land in the north west of the Plan area.

Water

- 3.29 The western and much of the northern boundaries of the Neighbourhood Plan area consist of the rivers Severn and Salwarpe. The Droitwich Canal runs alongside the river Salwarpe. Both rivers have relatively wide floodplains and much of the land alongside these watercourses is functional floodplain. Beyond these areas the rest of the Plan area is in Flood Zone 1 which has a less than 1:1,000 year probability of flooding. There are a number of areas within the Neighbourhood Plan area that are subject to surface water flooding, which includes within the village of Fernhill Heath and wider rural areas³³.
- 3.30 The entire Plan area falls within a Surface Water Safeguarded Zone. A small proportion of the Plan area is covered by a Groundwater Source Protection Zone and there are also a number of minor aquifers of intermediate to high vulnerability. The stretches of the River Severn and River Salwarpe that are close to the Plan boundary are assessed by the EA as having moderate ecological quality³⁴.
- 3.31 The South Worcestershire Water Cycle Study (WCS) (2012 update) assessed the provision of 350 dwellings at Dilmore Lane/ Station Road in Fernhill Heath as potentially having a medium to high impact on sewerage infrastructure. Flows from Fernhill Heath drain to a terminal pumping station that pumps flows to Droitwich Ladywood Sewage Treatment Works. The WCS found that this pumping station does not have sufficient capacity to accept additional flows from the provision of 350 dwellings and development and capacity improvements will be required³⁵. Further updates to the WCS were carried out in 2014³⁶; however, it does not appear that there were any changes to the previous conclusions made with regard to the Dilmore Lane/ Station

³³ South Worcestershire Authorities (2012) Strategic Flood Risk Assessment Level 2 Update. Prepared by JBA Consulting.

³⁴ Ibid.

³⁵ South Worcestershire Authorities (May 2013) South Worcestershire Water Cycle Study 2012 Update. Prepared by JBA Consulting.

³⁶ South Worcestershire Authorities (Sept 2014) South Worcestershire Water Cycle Study 2014 Update. Prepared by JBA Consulting.

Road Site. It should be noted that the SWDP proposes 120 dwellings at the site, a reduced level of development than was considered through the WCS.

- 3.32 The WCS concluded that there appears to be no physical restraints to upgrades of the water supply infrastructure based on the previous WCS as well as the comments from Severn Trent Water. Investment will be required to the water supply infrastructure for it to be able to accommodate the proposed level of growth proposed in the SWDP³⁷.

Air & Climatic Factors

- 3.33 There are no Air Quality Management Areas within the Plan area; however, it should be noted that there are two within Worcester City and one within Evesham³⁸. The District Council monitors annual mean nitrogen dioxide concentrations at 20 locations, none of which are within the Neighbourhood Plan area³⁹. There is a lack of information with regard to air quality within the Plan area; therefore, it is assumed that traffic, in particular along the A449 and A38, is the main source of atmospheric pollution within the Plan area. It is important to note that since 2005, it is estimated that there has been a reduction in the amount of greenhouse gas emissions being produced within the District⁴⁰.

Cultural Heritage

- 3.34 There is two Grade II* and 25 Grade II listed buildings within the Plan area as well as two Conservation Areas; Bevere and the Droitwich Canal. It should be noted that there are also three Conservation Areas adjacent to the Plan area; Claines, Martin Hussingtree and Riverside in Worcester. There are three Locally Important Parks and Gardens (LIHPG) within the Neighbourhood Plan area; Bevere House, Bevere Manor and Hawford. In addition part of Hindlip Park LIHPG is also located within the Plan area. There are also a number of sites designated as archaeologically sensitive within Worcester to the south of the Neighbourhood Plan area. While there are no Scheduled Monuments within or adjacent to the Plan area, there are a number present near Grimley and Hawford to the north west.

Landscape

- 3.35 The majority of the Plan area falls within the settled farmlands with pastoral land use landscape character area. The areas along the northern and western boundaries around the Rivers Severn and Salwarpe have a riverside meadow character. In the south west there is also an area of settled farmlands on river terrace. Timbered

³⁷ Ibid.

³⁸ Worcestershire Regulatory Services (2013) Worcestershire Air Quality Action Plan.

³⁹ Worcestershire Regulatory Services (Dec 2014) 2014 Air Quality Progress Report for Wychavon District Council.

⁴⁰ UK local authority and regional carbon dioxide emissions national statistics: 2005-2012

Farmland makes up much of the character of the immediate surrounding area. There are also the two urban character areas of Droitwich to the north east and Worcester to the south⁴¹.

- 3.36 The scale and character of the A449 corridor creates a clear break in the landscape, separating the Neighbourhood Plan area in the north from Worcester to the south. Fernhill Heath lies on high ground to the north with a mixed character of historic housing and large areas of 20th Century suburban development. To the north, east and west of the village the landscape becomes increasingly rural with rolling agricultural land defined by hedgerows, trees and pockets of woodland. To the west the low lying land is defined by the historic parkland and isolated dwellings within Bevere and the floodplain character of the River Severn.
- 3.37 The West Midlands Green Belt lies along the southern and eastern edges of the Plan area. Its purpose is primarily to prevent the coalescence of Fernhill Heath with Worcester. It should also be noted that there are two protected areas of open space within Fernhill Heath; the Brum and Teasel Way.

Material Assets (Transport, Minerals and Waste Infrastructure)

- 3.38 The Plan area is well served by existing road infrastructure with the A449 providing connections to Worcester and Junction 6 of the M5 as well as Kidderminster to the north. The A38 provides links up to Droitwich Spa in the north.
- 3.39 The Oxford, Worcester and Wolverhampton rail line passes through the Plan area; however, there is no station within the Plan area at this point in time with the nearest stations in Worcester and Droitwich. Three bus services (355, 144 & 144A and 303) run through the Plan area, which provide regular daily local connections between Bevere, Droitwich, Claines, Fernhill Heath and Kidderminster. National Cycle Network Route 46 passes through the Plan area and provides a route from Worcester to Droitwich.
- 3.40 There are no current or past mineral sites within the Plan area; however, the County Council have identified significant deposits of sand and gravel within the Plan area⁴². There are currently no operating waste management facilities/sites within the Plan area⁴³.

⁴¹ Worcestershire County Council (2011) Landscape Character Assessment. Available online: http://www.worcestershire.gov.uk/info/20014/planning/1006/landscape_character_assessment

⁴² Worcestershire County Council (2015) Analysis of Minerals Resources. Available online: http://www.worcestershire.gov.uk/downloads/download/85/analysis_of_mineral_resources

⁴³ Worcestershire County Council – Waste Sites Mapping. Available online: <http://gis.worcestershire.gov.uk/website/WasteCoreStrategy/>

Evolution of the Baseline without the Neighbourhood Plan

- 3.41 Without the implementation of the Neighbourhood Plan it is unlikely that there would be any significant differences in the current baseline information set out above. The SWDP already proposes development within the Neighbourhood Plan area and contains policies that seek to protect and enhance biodiversity, landscape, and heritage - and seek the provision of associated infrastructure, including community facilities/services and open/green space. Despite this, the Neighbourhood Plan does provide an opportunity to ensure that the environmental issues of key importance to the Parish are given more detailed consideration through the planning process and decision-making. It is therefore considered that some of the existing trends for the Parish identified above, are more likely to be addressed with the implementation of the Neighbourhood Plan.

Key Environmental Issues

- 3.42 It is important to distil the key environmental issues and opportunities from the collated baseline information and the review of plans and programmes, as the SEA Objectives are derived to address the key environmental issues outlined for the Plan area.
- 3.43 The key sustainability issues for the wider SWDP area were presented in Section 3 of the Pre-Submission SA Report published in 2012⁴⁴. These included:
- The provision of quality affordable housing to meet housing needs in Worcester City, the key settlements and surrounding rural area.
 - High levels of commuting and reliance on the private car for transport.
 - Improving the transport infrastructure, in particular the availability of public transport in rural areas.
 - Opportunities to stimulate the local economy through development of technological skills and diversification, including for the rural economy.
 - Protecting and enhancing open/ green space and promoting Green Infrastructure in new developments to support community and wider biodiversity interests.
 - Flood risk is an ongoing issue for key settlements, sustainable management of water resources should be an integral part of all new development.
 - Opportunities to incorporate good practice sustainable design, including renewable energy into new development to reduce and minimise the carbon footprint of the plan area.
- 3.44 The key sustainability issues identified for the SWDP area along with the review of plans and programmes presented in Section 2 of this Report, baseline information presented in Section 3 and responses received

⁴⁴ http://www.swdevelopmentplan.org/?page_id=254

from statutory consultees on the Screening Opinion (March 2015), have informed the identification of key environmental issues for the North Claines Neighbourhood Plan area, which are set out below:

- **Changing population** - significant increases in the number of adults over 65 and children aged 5 to 15 years will change requirements for housing accommodation and increase pressure on residential care, health care and education provision and other amenities and services.
- **High levels of commuting and reliance on the private car** - lack of employment within the Plan area itself and opportunities to improve access to sustainable transport modes and links to the employment areas in the north of Worcester City. Opportunities to provide greater employment opportunities within the Plan area and improve access to sustainable transport.
- **Transport infrastructure** - the public have raised concerns through consultation on the emerging Neighbourhood Plan with regard to the impacts of further development on the highways network and the improvements needed to transport infrastructure, including footpaths/cycleways.
- **Designated biodiversity** - of local importance within the Plan area and national importance in close proximity. In response to the Screening Opinion (March 2015) NE stated that the key site that could be potentially affected by the Neighbourhood Plan is the Northwick Marsh SSSI. Opportunities to enhance habitats, in particular connectivity between functioning habitats.
- **Rural Landscape Character** - the public have raised concerns through consultation on the emerging Neighbourhood Plan with regard to the loss of countryside and the need to retain the rural identity and character of the Plan area.
- **Designated heritage assets** - within and surrounding the Plan area, including Conservation Areas and Listed Buildings. The public have raised concerns through consultation on the emerging Neighbourhood Plan with regard to the potential impacts of further development on the historic setting of the Plan area. Opportunities to improve access and signage to heritage assets where possible.
- **Best and most versatile agricultural land** - is present within the Plan area and should be protected where possible.
- **Flood Risk** - areas within the Plan area should be avoided and flood risk reduced and mitigated where necessary.
- **Increased pressure on water resources and wastewater treatment capacity** - which could have implications for water levels and quality.

The SEA Framework

- 3.45 The SEA Framework provides the basis by which the environmental effects of the Neighbourhood Plan will be described, analysed and compared. The SA/SEA Framework developed for the higher level

SWDP is presented in Section 2 of the Pre-Submission SA Report published in 2012⁴⁵ and helped to inform the development of SEA Objectives for the NCNP.

- 3.46 The SEA Framework for the NCNP is presented below in Table 3.1 and has been developed to address the key issues identified earlier in this Section. It includes a number of objectives, elaborated by decision making criteria, which are linked to SEA topics, the NPPF and any relevant SA/SEA Objectives developed for the SA/SEA of the SWDP.

Table 3.1: The SEA Framework

SEA Objective		Decision Aiding Questions Does the Neighbourhood Plan ...?
1	To meet the needs of current and future residents <ul style="list-style-type: none"> SEA Topics: population, human health NPPF Paras: 14, 16, 17, 50, 54, 55 & 162 Relevant SWDP SA/SEA Objectives: 2, 3 & 8 	<ul style="list-style-type: none"> Ensure that all residents have access to appropriate and affordable housing? Ensure the timely delivery of infrastructure that meets the needs of new and existing development? Ensure provision of community facilities (cultural, health, social, education, recreation) to meet residents needs?
2	To minimise impacts on the highways network reduce the need to travel <ul style="list-style-type: none"> SEA Topics: population, human health, air, material assets & climatic factors NPPF Paras: 29 - 46 Relevant SWDP SA/SEA Objectives: 7, 9 & 13 	<ul style="list-style-type: none"> Seek to improve access to sustainable transport modes, including walking and cycling routes? Seek to improve employment opportunities within the Plan area? Seek to improve the sustainable transport links within the Plan area as well as to employment opportunities and services/facilities in the north of Worcester City? Ensure that the impacts of further development on the highways network are minimised and appropriate mitigation provided where necessary?
3	To protect and enhance biodiversity <ul style="list-style-type: none"> SEA Topics: biodiversity, flora & fauna NPPF Paras: 109 -125 Relevant SWDP SA/SEA Objective: 10 	<ul style="list-style-type: none"> Protect and enhance locally and nationally designated biodiversity sites within the influence of the Plan? Protect and enhance important habitats and species where possible? Protect and enhance habitat connectivity where possible?
4	To protect, enhance and manage the character of the landscape <ul style="list-style-type: none"> SEA Topic: Landscape 	<ul style="list-style-type: none"> Protect and enhance the rural character of the Plan area? Protect the Green Belt and reduce the potential for coalescence?

⁴⁵ http://www.swdevelopmentplan.org/?page_id=254

	<ul style="list-style-type: none"> ■ NPPF Paras: 109 -125 ■ Relevant SWDP SA/SEA Objective: 11 	<ul style="list-style-type: none"> ■ Protect and enhance the townscape and setting of settlements within the Plan area?
5	<p>To conserve and enhance the historic environment , heritage assets and their settings</p> <ul style="list-style-type: none"> ■ SEA Topic: Cultural heritage ■ NPPF Paras: 126 -141 ■ Relevant SWDP SA/SEA Objective: 12 	<ul style="list-style-type: none"> ■ Conserve and/or enhance heritage assets and the historic environment? ■ Improve the quality of the historic environment? ■ Provide for increased access to and enjoyment of the historic environment?
6	<p>To protect and enhance soils</p> <ul style="list-style-type: none"> ■ SEA Topic: Soil ■ NPPF Paras: 109 & 112 ■ Relevant SWDP SA/SEA Objective: 13 	<ul style="list-style-type: none"> ■ Seek to use poorer quality land in preference to that of higher quality, in particular best and most versatile agricultural land? ■ Encourage enhanced local food production and security?
7	<p>To reduce and manage flood risk</p> <ul style="list-style-type: none"> ■ SEA Topic: Water & climatic factors ■ NPPF Paras: 94, 99 - 104 ■ Relevant SWDP SA/SEA Objective: 14 	<ul style="list-style-type: none"> ■ Ensure that development is directed away from areas of high flood risk? ■ Ensure that development does not increase flood risk elsewhere? ■ Seek the incorporation of sustainable drainage measures where possible?
8	<p>To protect and enhance the water environment</p> <ul style="list-style-type: none"> ■ SEA Topic: Water ■ NPPF Paras: 94, 99, 109 & 162 ■ Relevant SWDP SA/SEA Objective: 14 	<ul style="list-style-type: none"> ■ Encourage the efficient use of water? ■ Seek to protect and enhance water quality where possible?

4.0 SEA of the Draft Neighbourhood Plan and Alternatives

Introduction

- 4.1 This Section sets out how alternatives have been considered through plan-making and the SEA as well as the findings of the SEA of the Draft NCNP.

Alternatives

- 4.2 Strategic options for the overall level of growth have already been considered at a higher level of plan-making and assessment through the development of the adopted SWDP and its associated SA/SEA process. The emerging SWDP proposes an overall housing requirement of 28,400 new dwellings for the Plan area up to 2030, which includes the provision of 10,600 new dwellings within Wychavon District. In addition, Wychavon District is also to make provision for some of Worcester City (referred to as the Wider Worcester Area) requirements. The SWDP proposes 900 new dwellings within the Wychavon Wider Worcester Area to meet this need. The principal reason put forward for this is the lack of deliverable land within the Worcester City boundaries and the significant need for new housing that is required from existing and future Worcester residents. The findings of the SA/SEA for strategic growth options and the reasons for their selection or rejection in plan-making are provided in the SA/SEA Documents published on the SWDP website⁴⁶.
- 4.3 Strategic options for the distribution of the housing requirement, as set out above, have also been considered through the adopted SWDP and its associated SA/SEA process. A number of alternatives have been considered throughout the development of SWDP, including focussing growth in Worcester, wider rural dispersal and a new settlement. The preferred approach is a settlement hierarchy with an urban focus, including urban extensions adjacent to Worcester City. The findings of the SA/SEA for strategic distribution options and the reasons for their selection or rejection in plan-making are provided in the SA/SEA Documents published on the SWDP website⁴⁷.
- 4.4 As part of determining how the overall level of housing growth should be distributed within the SWDP area, there has also been consideration of potential site options to accommodate this growth. A number of strategic and non-strategic site options were considered through the South Worcestershire Council's site selection process and any reasonable options were subject to SA/SEA.
- 4.5 The Gwillam's Farm site was subject to appraisal through the SA/SEA process for the SWDP. It was considered through the SWDP and SA/SEA as a strategic site alternative to help meet some of Worcester

⁴⁶ <http://www.swdevelopmentplan.org/>

⁴⁷ Ibid.

City's housing needs. The findings of the SA/SEA for strategic site options are presented in Appendix 4 of the SWDP Pre-Submission SA Report (Nov 2012)⁴⁸. The reasons for selection or rejection of the strategic site options are provided in Table 4.2 of SWDP SA Addendum Report (July 2013).

- 4.6 The Council identified three reasonable site options adjacent to the settlement of Fernhill Heath that could potentially deliver new housing during the life of the Plan. A number of site options identified through the SHLAA (2012) process⁴⁹ were not considered reasonable as they were not consistent with the distribution strategy and/ or as a result of existing constraints, including the Green Belt. The three reasonable site options considered through the SA process were Dilmore Lane/ Station Road (SHLAA 2012 Ref 61-14), site off A38 between Old Drive and Sling Lane (SHLAA Ref 61-13) and Worcestershire Hunt Kennels off Kennel Lane (SHLAA Ref 61-26).
- 4.7 The three reasonable alternatives were subject to a comparative appraisal through the SA/SEA process for the SWDP. The findings are presented in Appendix F of the SWDP SA Addendum Report (Sept 2014)⁵⁰. The Old Drive and Sling Lane site was rejected as it wasn't available at that time and the Worcestershire Hunt Kennels off Kennel Lane site was rejected as it was more remote compared to the other options and there was also highways concerns. It should be noted that on 2 December 2015 an appeal decision granted planning permission for 87 dwellings at land at the Worcestershire Hunt Kennels on Kennels Lane. A reduced Dilmore Lane/ Station Road site is now being progressed by the South Worcestershire Councils through the SWDP for the delivery of around 120 new dwellings. It should be noted that a higher level of growth was being proposed by the proponents of the site; however, the South Worcestershire Councils had concerns that larger scale development would reduce the gap between Fernhill Heath and Lower Town.
- 4.8 A neighbourhood plan must be in general conformity with higher level planning policy, which includes the adopted SWDP. This means that the NCNP is limited in terms of the options that can be considered during its development and reasonable alternatives through the SEA. The overall level and distribution of growth has already been established at a higher level of plan-making through the SWDP and reasonable site options to accommodate housing already considered through the SA/SEA process for the SWDP.
- 4.9 NCNP Policy NCH1B supports new residential development at the site off A38 between Old Drive and Sling Lane. The site is now available and was previously identified as an area of development restraint and safeguarded through saved Policy SR9 in the Wychavon District Local

⁴⁸ http://www.swdevelopmentplan.org/wp-content/uploads/2012/11/SA_Appendix4SAofSiteUrbanCapacityUrban-Extensions_Nov12.pdf

⁴⁹ http://www.swdevelopmentplan.org/?page_id=3342

⁵⁰ http://www.swdevelopmentplan.org/wp-content/uploads/2013/02/SA_AppxFSept2014.pdf

Plan. The site is therefore in conformity with the previous Local Plan and is also less remote than the Worcestershire Hunt Kennels off Kennel Lane site option previously considered through the SA for the SWDP. There has been no new evidence to suggest that there are any other reasonable site options that need to be considered through the Draft NCNP and therefore the SEA.

- 4.10 The location needs of a rail halt park and ride site are inherently a rail line and the strategic highway network. The site identified in the plan is the only reasonable location and no others are considered feasible within the NPA.

The Draft Neighbourhood Plan

- 4.11 This SEA of the North Claines Draft Neighbourhood Plan is structured according to the 8 SEA Objectives, which have been linked to SEA Directive topics as well as relevant paragraphs in the NPPF and SWDP SA/SEA Objectives. The appraisal of each topic has been divided into a number of sub-headings to ensure that each aspect of the emerging Plan is considered as well as the interrelationships between topics and cumulative effects of the Plan as a whole.
- 4.12 In accordance with the SEA Directive and Regulations any likely significant effects are identified along with any mitigation measures necessary to address them. The SEA does not therefore provide a narrative on the nature and significance of effects for each policy within the Plan, as a policy might not be relevant to a particular topic or is considered unlikely to have a significant effect. It should be noted that there have been minor updates to the appraisal presented below to ensure consistency with the Policies now proposed in the Submission NCNP.

SEA Objective 1: To meet the needs of current and future residents

Does the Neighbourhood Plan:

- Ensure that all residents have access to appropriate and affordable housing?
- Ensure the timely delivery of infrastructure that meets the needs of new and existing development?
- Ensure provision of community facilities (cultural, health, social, education, recreation) to meet resident's needs?

SEA Topic: Population, human health

NPPF Paras: 14, 16, 17, 50, 54, 55 & 162

Relevant SWDP SA/SEA Objectives: 2, 3 & 8

SEA of the Draft Neighbourhood Plan

- 4.13 The Draft North Claines Neighbourhood Plan (NCNP) Vision seeks to meet the needs of the local community and Objective 1 seeks to ensure that future housing provision meets local housing need for both the market and social sector. This is compatible with this SEA Objective and will positively progress the decision-aiding questions. Draft NCNP Objectives 2, 5 and 6 also positively progress this SEA Objective as they seek to strengthen and upgrade community facilities and services.
- 4.14 The wider policy framework in the adopted South Worcestershire Development Plan (SWDP) provides the overall level of planned growth for the period up to 2030 as well as the general direction of growth across the District. Of particular relevance to the Neighbourhood Plan Area (NPA) is the need to accommodate growth to support Worcester City in the form of urban extensions adjoining the city boundaries (Policies SWDP 3 and SWDP 45). Further to this Droitwich Spa is recognised as a key area for planned growth, with allocations and a relatively large urban extension proposed in the emerging SWDP (Policies SWDP 48 and SWDP 49). The NCNP area is located between Worcester City and Droitwich Spa, and the emerging SWDP proposes that it accommodates 250 new dwellings at an urban extension at Gwillam's Farm, just north of Worcester City as well as 120 new dwellings at Dilmore Lane / Station Road.
- 4.15 Draft NCNP Policy NCH1 is in conformity with the emerging SWDP, acknowledging the two proposed housing allocations at Gwillam's Farm and Dilmore Lane/Station Road. The policy also allows proposals for new residential development at Sling Lane/ Old Drive in Fernhill Heath, which is a safeguarded site in the WDLF.
- 4.16 Policy NCH1 further supports development within the existing boundaries of Fernhill Heath, which is identified as a Category 2 Village in the emerging SWDP. This is in conformity with the wider policy framework (both existing and emerging) and directs development in an area recognised for its provision of services, facilities and infrastructure to support sustainable access and movement. It is therefore considered that Policy NCH1 has the potential for major long-term positive effects against SEA Objective 1 as it will help to meet the housing needs of the local community.
- 4.17 The Draft NCNP further proposes new infrastructure, including a new school and rail halt park and ride facility, this development can support the expected population increase and improve access to services, facilities and employment opportunities in Worcester City, with the potential for major long-term positive effects against SEA Objective 1
- 4.18 A key issue identified for the NPA is in retaining its rural character whilst accommodating housing growth, and Policy NCH2 seeks to ensure that housing design is of high standards and considers character, density and infrastructure, utilities and services connections; with the

potential for long-term positive effects. The policy could enhance positive effects by encouraging early and active design consultation with the local community, and by changing the policy wording from '*must ensure that they are well-designed and integrate*' to '*must demonstrate that they are well-designed and integrate*' this can support a provision of evidence of early design consideration in planning applications as outlined in the detailed design policies (Policies NCD1-3) and increase overall continuity in the policies.

- 4.19 Policy NCH3 requires a Local Housing Provision Statement to accompany any planning applications. This must assess its contribution to local housing needs, including affordable housing needs, with the potential for major long-term positive effects against SEA Objective 1. The Draft NCNP further supports the needs of current and future residents through the support and encouragement of community and educational development supported by sustainable access arrangements, the retention of valued community assets (Policy NCC1) and adequate provision of local health care (Policy NCC3).
- 4.20 Overall, the Draft NCNP will have major long-term positive effects against this SEA Objective by helping to meet the housing and infrastructure needs of the local community.

Synergistic and Cumulative Effects

- 4.21 The cumulative effect of housing delivery and infrastructure development across the NPA has the potential to provide local benefits as well as further reaching positive effects in Worcester City and the Wider Worcester Area.

Inter-relationships with other SEA Objectives

- 4.22 The provision of housing and infrastructure has inter-relationships with numerous other SEA Objectives. Housing growth has the potential for negative effects on transport and highways, biodiversity, landscape and soils, historic environment and water quality and resources. There may also be minor short-term negative effects on health during construction phases. Housing growth and infrastructure improvements also have the potential for positive effects on health (through the provision of quality and affordable housing), biodiversity, townscapes and the historic environment.

SEA Objective 2: To minimise impacts on the highways network and reduce the need to travel

Does the Neighbourhood Plan:

- Seek to improve access to sustainable transport modes, including walking and cycling routes?
- Seek to improve employment opportunities within the Plan area?
- Seek to improve the sustainable transport links within the Plan area as well as to employment opportunities and services/facilities in the north of Worcester City?
- Ensure that the impacts of further development on the highways network are minimised and appropriate mitigation provided where necessary?

SEA Topics: population, human health, air, material assets & climatic factors

NPPF Paras: 29 - 46

Relevant SWDP SA/SEA Objectives: 7, 9 & 13

SEA of the Draft Neighbourhood Plan

- 4.23 The Draft NCNP Vision seeks a diverse and thriving NPA with Fernhill Heath providing many of the key services, facilities and infrastructure to meet the needs of the local community. Draft NCNP Objective 5 seeks to strengthen and upgrade the transport infrastructure with improvements to public transport provision, cycling provision and to the road network where it provides benefits to safety, residential amenity and sustainable travel. This positively progresses this SEA Objective by seeking to improve access to sustainable modes of transport, and sustainable transport links within the NPA.
- 4.24 A key sustainability issue identified at the Scoping stage of the SEA of the NCNP relates to the high levels of out-commuting and reliance on the private vehicle in the plan area. Further development within the Parish has the potential to increase levels of out-commuting as well as car ownership; however, given the scale of development this is considered unlikely to be of significance, with the potential for minor long-term negative effect against SEA Objective 2.
- 4.25 The SA process for the SWDP noted that the Gwillam's Farm site is located in close proximity to a park and ride facility to the north east providing regular public transport services into Worcester City Centre as well as a National Cycle Route (on Cornmeadow Lane). It should be noted that the Worcestershire County Council has now shut down the park and ride referred to in the appraisal. The SA found that development at the site has the potential for minor long-term positive effects by improving access to sustainable transport modes and

facilities⁵¹. The SA process for the SWDP also noted that the sites in Fernhill Heath (including the Dilmore Lane / Station Road and the Sling Lane/ Old Drive site) have medium levels of public transport provision (access to all day time journey types) with the potential for minor positive effects⁵².

- 4.26 The Sling Lane/ Old Drive site is a reasonable walking distance from bus stops along Droitwich Road, which is a primary route. It is also within reasonable walking distance to the Village Centre. Development at the site is unlikely to be of a scale that would significantly improve transport infrastructure, including sustainable transport modes. However, there are opportunities to enhance walking and cycling routes into the Village Centre. There is the potential for minor long-term positive effects as the site is in close proximity to bus stops, the Village Centre and any proposal for development could help to improve walking and cycling routes into the Centre.
- 4.27 The proposed park and ride facility could reduce the number of vehicles on local roads, and increase sustainable transport connections with Worcester City, and other local destinations, with the potential for major long-term positive effects.
- 4.28 There are no Air Quality Management Areas within the NPA, however the baseline information has identified that traffic is likely to be the main source of atmospheric pollution, particularly along the A449 and A38. Any development at the settlement is likely to increase traffic along these roads; however given the scale of the proposed development, this is considered unlikely to lead to any significant negative effects, particularly as the baseline trends indicate a reduction in the amount of greenhouse gases being produced in the District since 2005.
- 4.29 Development proposed could increase traffic within the NPA; however, the SWDP provides mitigation to ensure that development considers sustainable travel choices, road safety and demand for travel (Policy SWDP 4) which should ensure that development will not lead to any significant negative effects on SEA Objective 2. The Draft NCNP policy framework provides further support for sustainable development at the local level, ensuring that development considers its impact on local highway capacity and road safety, and provides appropriate access to public transport (Policy NCT1). To enhance Policy NCT1 it is recommended that point 5 not only 'makes provision' but also *prioritises* 'safe and efficient movement of the mobility impaired, pedestrians and cyclists'.

⁵¹ SWDP Pre-Submission SA Report (Nov 2012) Appendix 4 - SA of Sites - Urban Capacity & Urban Allocations: Preferred Option. Available online: http://www.swdevelopmentplan.org/wp-content/uploads/2012/11/SA_Appendix4SAofSiteUrbanCapacityUrban-Extensions_Nov12.pdf

⁵² SWDP SA Addendum Report (Sept 2014) Appendix F - Significant Changes to and Newly Proposed Rural Allocations. Available online: http://www.swdevelopmentplan.org/wp-content/uploads/2013/02/SA_AppxFSept2014.pdf

- 4.30 The Draft NCNP further seeks to create and enhance access to public transport through a rail halt Park and Ride facility (Policy NCT4), as there is currently no active rail service within the plan area. Given the existing high levels of car ownership and commuting in the plan area, Policy NCT4 seeks to directly address an identified sustainability issue, which includes improved access to employment opportunities, with the potential for major long-term positive effects against SEA Objective 2.
- 4.31 The Draft NCNP policy framework further supports landscape and public realm improvements along transport corridors (Policy NCT3), improved sustainable transport routes (Policy NCT2) as well as maintaining connections within the countryside (Policy NCLE12), which have the potential for minor positive effects against SEA Objective 2. Policy NCD1 requires that any proposal must address travel and access within a Design and Access Statement, which also has the potential for a minor positive effect against this SEA Objective.

Synergistic and Cumulative Effects

- 4.32 Development within the plan area is likely to result in negative cumulative effects on highway capacity and congestion; however, the mitigation provided through SWDP and Draft NCNP policies should ensure that this is not significant. Development within the plan area that increases access to public transport services also has the potential for minor long-term cumulative positive effects against SEA Objective 2.

Inter-relationships with other SEA Objectives

- 4.33 Transport is closely interlinked with a number of other SEA Objectives. Potential effects on transport can also have the potential for indirect negative or positive effects on access to services, facilities and employment opportunities, health, biodiversity, landscape and soils, the historic environment, and water quality and flood risk.

SEA Objective 3: To protect and enhance biodiversity

Does the Neighbourhood Plan:

- Protect and enhance locally and nationally designated biodiversity sites within the influence of the Plan?
- Protect and enhance important habitats and species where possible?
- Protect and enhance habitat connectivity where possible?

SEA Topics: biodiversity, flora & fauna

NPPF Paras: 109 -125

Relevant SWDP SA/SEA Objective: 10

SEA of the Draft Neighbourhood Plan

- 4.34 The Draft NCNP Vision seeks to protect the countryside from inappropriate development and Objective 8 seeks to protect and enhance the NPA's nature conservation assets and local green spaces. This positively progresses this SEA Objective by helping to protect and enhance biodiversity. Draft NCNP Objective 4 is also compatible with this SEA Objective as it ensures that development is designed to retain and reflect the NPA's unique and distinctive characteristics and incorporate high levels of environmental sustainability. Draft NCNP Objectives 1, 2, 3, 5 and 6 are less likely to progress this SEA Objective as they seek new housing, employment, village centre services and facilities as well as infrastructure development to meet local needs, which has the potential for negative effects on biodiversity.
- 4.35 The SA process for the SWDP found that development at the Gwillam's Farm site is not likely to result in any significant negative effects on biodiversity⁵³. The SA did not identify any significant negative effects on biodiversity as a result of the development at the Dilmore Lane/ Station Road and Sling Lane/ Old Drive sites once mitigation was taken into account. It did note that there are Ancient Woodland and Hedgerows present on the Dilmore Lane/ Station Road site but if development avoided these areas then there is unlikely to be any significant effects⁵⁴.
- 4.36 The Sling Lane/ Old Drive site is located adjacent to a Special Wildlife Site and Biodiversity Action Plan Priority Habitats of Wood-pasture and Parkland. Numerous trees also line the eastern boundary of the site. Development could result in minor negative effects on biodiversity as a result of increased disturbance, noise and light pollution; however, it is considered that suitable mitigation is provided through SWDP and Draft NCNP policies to ensure that the residual effects are neutral. There is some uncertainty at this stage as the precise scale and type of development is not known. Any proposal for development should seek to retain any trees and hedgerows along the boundary of the site where possible and provide appropriate buffers where necessary.
- 4.37 The rest of the proposed development within the Draft NCNP is not located in close proximity of any international, national or locally designated nature conservation sites, and as such is unlikely to lead to any significant effects, with the potential for a residual neutral effect against SEA Objective 3.

⁵³ SWDP Pre-Submission SA Report (Nov 2012) Appendix 4 - SA of Sites - Urban Capacity & Urban Allocations: Preferred Option. Available online: http://www.swdevelopmentplan.org/wp-content/uploads/2012/11/SA_Appendix4SAofSiteUrbanCapacityUrban-Extensions_Nov12.pdf

⁵⁴ SWDP SA Addendum Report (Sept 2014) Appendix F - Significant Changes to and Newly Proposed Rural Allocations. Available online: http://www.swdevelopmentplan.org/wp-content/uploads/2013/02/SA_AppxFSept2014.pdf

- 4.38 Mitigation provided through the emerging SWDP and Draft NCNP policies are considered sufficient to ensure that there will be no significant negative effects on biodiversity. At a higher level of plan-making the SWDP (Policy SWDP 22) provides protection for international, national and local level nature conservation and requires that development is designed to enhance biodiversity and geodiversity interests and safeguard ecological corridors. The Draft NCNP provides further protection for local level nature conservation (Policy NCLE5), trees and woodland (NCLE6), green space (Policy NCLE4) and connections with the countryside (Policy NCLE1). These policies have the potential for a long-term minor positive effect against SEA Objective 3.
- 4.39 In response to the SEA Screening for the NCNP, Natural England expressed concern that references to the environment and its protection, particularly in reference to nearby SSSIs is limited. NE stated that more should be added to the Plan in relation to the protection of SSSIs, particularly when looking at further developments in the NPA. To help strengthen the Draft NCNP and address concerns raised by NE it is recommended that the supporting text of Policy NCLE5 refers to SSSIs. SWDP Policy 22 (Biodiversity and Geodiversity) should ensure that SSSIs are given sufficient protection. It is also recommended that any proposal for development considers biodiversity when considering design.

Synergistic and Cumulative Effects

- 4.40 Given the scale and location of the proposed development within the NPA, it is considered unlikely that there will be any significant cumulative negative effects on biodiversity. Development across the plan area has the potential to enhance green space provision within the urban areas (particularly Fernhill Heath) and contribute to cumulative positive effects by enhancing green/ ecological corridors and connections within the plan area.

Inter-relationships with other SEA Objectives

- 4.41 Biodiversity is influenced by a number of the topics considered through the SEA. Potential negative effects on the water environment, soil, landscape, and flooding can have indirect negative effects on biodiversity. Similarly, improvements to biodiversity can also have benefits for these topics as well as indirect positive effects on communities and health.

SEA Objective 4: To protect, enhance and manage the character of the landscape

Does the Neighbourhood Plan:

- Protect and enhance the rural character of the Plan area?
- Protect the Green Belt and reduce the potential for coalescence?
- Protect and enhance the townscape and setting of settlements within the Plan area?

SEA Topic: Landscape

NPPF Paras: 109 -125

Relevant SWDP SA/SEA Objective: 11

SEA of the Draft Neighbourhood Plan

- 4.42 The Draft NCNP Vision seeks to ensure that new development is incorporated into its setting, retaining and reflecting the Area's unique and distinctive character, in which opportunities are provided to allow residents to enjoy the countryside which will be protected from inappropriate development. Objective 4 seeks to ensure that new development is designed to retain and reflect the NPA's unique and distinctive characteristics and incorporate high levels of environmental sustainability. Objective 7 seeks to protect and enrich the historic townscape and landscape and Objective 8 seeks to protect and enhance the NPA's nature conservation assets and local green spaces. Objective 9 seeks to strengthen and support opportunities to access, utilise and enjoy the countryside within the NPA. These all positively progress this SEA Objective by helping to protect and enhance landscapes and maintain the rural character of the NPA. Draft NCNP Objectives 1, 3, 5 and 6 are less likely to progress this SEA Objective as they seek new housing, employment, and infrastructure development to meet local needs, which has the potential for negative effects on the landscape.
- 4.43 A key sustainability issue identified at the scoping stage of the SEA process for the NCNP, and raised by the public during consultation, is the need to maintain the NPAs rural landscape character. Development at the Gwillam's Farm, Dilmore Lane/Station Road and Sling Lane/ Old Drive sites was considered through the SA/SEA process for the SWDP. The SA found that small scale development at the Gwillam's Farm site is not likely to have significant negative effects on landscape⁵⁵. The SA found that development at the Dilmore Lane/ Station Road site could have the potential for negative effects on the rural landscape through the loss of TPOs and impacts on the strategic

⁵⁵ SWDP Pre-Submission SA Report (Nov 2012) Appendix 4 - SA of Sites - Urban Capacity & Urban Allocations: Preferred Option. Available online: http://www.swdevelopmentplan.org/wp-content/uploads/2012/11/SA_Appendix4SAofSiteUrbanCapacityUrban-Extensions_Nov12.pdf

gap with Lower Town⁵⁶. The SA also noted that development at both the Dilmore Lane / Station Road and Sling Lane/ Old Drive sites would result in the loss of green infrastructure that is considered to be of average value⁵⁷.

- 4.44 The Sling Lane/ Old Drive site is greenfield land adjacent to the existing settlement and the Green Belt. Development would result in the loss of greenfield land and therefore has the potential for a negative effect on landscape. There is also the potential for the loss of trees along the eastern border of the site, which could increase the significance of this negative effect. Development of the proposed rail halt park and ride facility would be located within the rural landscape and within the Green Belt with the potential for a minor to major negative effect against SEA Objective 4.
- 4.45 The SWDP provides mitigation at the strategic plan level, and Policy SWDP 25 requires that development is clearly appropriate to and integrates with the character of the landscape setting, and provides a Landscape and Visual Impact Assessment in major development proposals; this should ensure that there will be no significant negative effects.
- 4.46 The design policies within the Draft NCNP (Policies NCD1-3) provide local level mitigation for any potential significant effects. The policies ensure that development considers context and character, including; local character, positive area attributes, scale and massing, amenity, crime and security, access, lighting, energy efficiency, and visual appearance. The Draft NCNP provides further mitigation to protect and enhance green space (Policy NCLE4), trees and woodland (Policy NCLE6), and connections with the countryside (Policy NCLE1). These policies are considered sufficient to ensure that proposed development at any of the sites will not result in significant negative effects. However, it is still considered that there is the potential for residual minor long-term negative effects. There are opportunities to provide accessible public open space within any proposals for housing development within or surrounding Fernhill Heath.

Synergistic and Cumulative Effects

- 4.47 Cumulatively development has the potential for negative effects on the landscape, through increased urbanisation, and the loss of greenfield land. Given the scale of development within the NPA, and the mitigation provided through SWDP and Draft NCNP policies, it is considered unlikely to result in any significant cumulative negative effects, with the potential for a residual minor negative cumulative effect. Cumulatively the provision of new green space, particularly within the urban areas, has the potential for minor positive effects.

⁵⁶ SWDP SA Addendum Report (Sept 2014) Appendix F - Significant Changes to and Newly Proposed Rural Allocations. Available online: http://www.swdevelopmentplan.org/wp-content/uploads/2013/02/SA_AppxFSept2014.pdf

⁵⁷ South Worcester Development Plan Maps - Interactive Policy Map.

Inter-relationships with other SEA Objectives

- 4.48 The landscape is influenced by and affects a number of the topics considered through the SEA. Potential negative effects on the water environment, biodiversity, heritage and soil can also have indirect negative effects on the landscape. Changes to the landscape can affect communities and health both positively and negatively.

SEA Objective 5: To conserve and enhance the historic environment, heritage assets and their settings

Does the Neighbourhood Plan:

- Conserve and/or enhance heritage assets and the historic environment?
- Improve the quality of the historic environment?
- Provide for increased access to and enjoyment of the historic environment?

SEA Topic: Cultural heritage

NPPF Paras: 126 -141

Relevant SWDP SA/SEA Objective: 12

SEA of the Draft Neighbourhood Plan

- 4.49 The Draft NCNP Vision seeks to ensure that new development is incorporated into its setting, retaining and reflecting the Area's unique and distinctive character, in which opportunities are provided to allow residents to enjoy the countryside which will be protected from inappropriate development. Objective 4 seeks to ensure that new development is designed to retain and reflect the NPA's unique and distinctive characteristics and incorporate high levels of environmental sustainability, and Objective 7 seeks to recognise the heritage assets within the NPA and protect and enrich the historic townscape and landscape. The vision and these objectives positively progress this SEA Objective by helping to conserve and enhance the historic environment, heritage assets and their settings. Draft NCNP Objectives 1, 2, 3, 5 and 6 are less likely to progress this SEA Objective as they seek new housing, employment, village centre services and facilities, and infrastructure development to meet local needs, which has the potential for negative effects on the historic environment.
- 4.50 A key sustainability issue identified at the Scoping stage of the SEA process for the NCNP, and raised by the general public, is the protection of the designated heritage assets within the NPA, including Conservation Areas and Listed Buildings, as well as the historic setting of the plan area.

- 4.51 The SA/SEA process for the SWDP found that development at the Gwillam's Farm site has the potential for minor to major negative effects on the historic environment as it lies just outside of the Bevere Conservation Area, its associated Listed Buildings and Locally Important Historic Parks and Gardens⁵⁸. The SA found that development at the Dilmore Lane/ Station Road and Sling Lane/ Old Drive sites has the potential for minor negative effects as it could have impacts on designated heritage assets, which includes Listed Buildings in close proximity⁵⁹. The proposed rail halt park and ride facility are unlikely to lead to any significant negative effects on the historic environment as they do not contain, and are not located adjacent to or in close vicinity of, any known designated heritage assets or their settings. There is an element of uncertainty as the presence of archaeology at the site is not yet known; however, it is considered that there is suitable mitigation available at the project level to ensure that there will be no significant negative effects. It should also be noted that there may be opportunities for positive effects on the historic environment as a result of development through improved signage and access; however, at this stage this is uncertain.
- 4.52 The policies contained within the SWDP (Policy SWDP 6) provide mitigation for designated heritage assets and their settings, historic landscapes, historic market cores, historic transportation networks and archeological remains, which should ensure that development will not lead to any significant negative effects against SEA Objective 5. The Draft NCNP provides further protection at the local level through Policy NCLE2, which provides protection for designated and non-designated local heritage assets and historic landscape character. Policy NCLE3 designates the original settlement area of Fernhill Heath as a Local Heritage Area and affords further protection to this area by requiring development to recognise its special local architectural and historic interest and make positive contributions to this, with the potential for minor positive effects against SEA Objective 5.
- 4.53 The mitigation provided through SWDP and NCNP policies is considered sufficient to ensure that there will be no significant negative effects on the historic environment. There is potential to strengthen Policy NCLE2 by including a reference to the setting of designated heritage assets. It is recommended that Policy NCLE3 is amended as follows (additions are in red and underlined and any deletions are in ~~red and strikethrough~~):

⁵⁸ SWDP Pre-Submission SA Report (Nov 2012) Appendix 4 - SA of Sites - Urban Capacity & Urban Allocations: Preferred Option. Available online: http://www.swdevelopmentplan.org/wp-content/uploads/2012/11/SA_Appendix4SAofSiteUrbanCapacityUrban-Extensions_Nov12.pdf

⁵⁹ SWDP SA Addendum Report (Sept 2014) Appendix F - Significant Changes to and Newly Proposed Rural Allocations. Available online: http://www.swdevelopmentplan.org/wp-content/uploads/2013/02/SA_AppxFSept2014.pdf

Policy NCLE3: Local Heritage Assets

Designated and non-designated heritage assets enhance local distinctiveness and should be preserved in a manner appropriate to their significance. All development should seek to protect and, where possible enhance, both designated and non-designated heritage assets (above and below ground) and their settings, as well as the historic landscape character, and put in place measures to avoid, minimise or mitigate any impact that may be caused.

Synergistic and Cumulative Effects

- 4.54 Given the scale of the proposed development within the Draft NCNP, and the mitigation provided through SWDP and Draft NCNP policies, it is not considered likely that development within the NPA will lead to any significant cumulative negative effects against SEA Objective 5.

Inter-relationships with other SEA Objectives

- 4.55 Heritage has links to a number of other SEA topics as it can be affected by housing/ employment and transport infrastructure, as well as the landscape and flooding. The protection and enhancement of heritage assets can also have indirect positive effects on communities and health.

SEA Objective 6: To protect and enhance soils

Does the Neighbourhood Plan:

- Seek to use poorer quality land in preference to that of higher quality, in particular best and most versatile agricultural land?
- Encourage enhanced local food production and security?

SEA Topic: Soil

NPPF Paras: 109 & 112

Relevant SWDP SA/SEA Objective: 13

SEA of the Draft Neighbourhood Plan

- 4.56 The Draft NCNP Vision seeks to protect the countryside from inappropriate development. Objective 4 seeks to ensure that new development is designed to retain and reflect the NPA's unique and distinctive characteristics and incorporate high levels of environmental sustainability, and Objective 8 seeks to protect and enhance the NPA's nature conservation assets and local green spaces. The vision and these objectives positively progress this SEA Objective by helping to protect and enhance soils. Draft NCNP Objectives 1, 2, 3, 5 and 6 are less likely to progress this SEA Objective as they seek new housing, employment, village centre services and facilities, and infrastructure

development to meet local needs, which has the potential for negative effects on soils.

- 4.57 The majority of the NPA contains Grade 3 agricultural land; however, it is not known if this is Grade 3a or Grade 3b. There are some large areas of Grade 2 agricultural land and a small area of Grade 4 to the north west of the NPA. Development at the Gwillam's Farm site has the potential to result in the permanent loss of best and most versatile agricultural land of the highest quality found in the NPA (Grade 2). The remaining site allocations and proposed development in the Draft NCNP are located on Grade 3 agricultural land; however, it is unknown whether this is sub-Grade 3a or 3b.
- 4.58 Policy SWDP 13 seeks the effective use of land and prioritises the use of previously developed land and restricts development on best and most versatile agricultural land to exceptional use. Policy SWDP 5 protects green infrastructure, Policy SWDP 38 protects the Local Green Network, Policy SWDP 31 provides protection for land against significant adverse effects of pollution, and areas of land instability, and Policy SWDP 32 prevents the sterilization of minerals.
- 4.59 The Draft NCNP provides further mitigation by protecting local green space (Policy NCLE4), local nature conservation assets (Policy NCLE5) and trees and woodland (Policy NCLE6). Design policy NCD1 also requires the efficient use of land in conformity with the wider (SWDP) policy framework.
- 4.60 While development proposed through the SWDP and Draft NCNP will inevitably result in the permanent loss of some agricultural land, including best and most versatile, the majority of proposed sites are directed towards areas of poorer agricultural land. It is considered that there is the potential for a permanent minor negative effect against SEA Objective 6. Any proposal for housing development should seek to provide allotments where possible, to encourage the local communities to produce their own food.

Synergistic and Cumulative Effects

- 4.61 Proposed development within the NPA and surrounding areas will inevitably result in the loss of greenfield sites and agricultural land, including best and most versatile agricultural land. Overall, the Draft NCNP has the potential for a residual minor negative effect on soils, as a result of the permanent loss of agricultural land.

Inter-relationships with other SEA Objectives

- 4.62 The soil is influenced by and affects a number of the topics considered through the SEA. Potential negative effects on soil can have indirect negative effects on human health and well-being, landscape, the historic environment, biodiversity and the water environment. Similarly, improvements to the soil can also have benefits for these topics.

SEA Objective 7: To reduce and manage flood risk

Does the Neighbourhood Plan:

- Ensure that development is directed away from areas of high flood risk?
- Ensure that development does not increase flood risk elsewhere?
- Seek the incorporation of sustainable drainage measures where possible?

SEA Topic: Water & climatic factors

NPPF Paras: 94, 99 - 104

Relevant SWDP SA/SEA Objective: 14

SEA of the Draft Neighbourhood Plan

- 4.63 The Draft NCNP Vision seeks to protect the countryside from inappropriate development, which would include development in the flood zone. The Vision could be strengthened by incorporating the aim for environmental sustainability outlined in Objective 4 (which would include the entire water environment particularly surface water flooding within urban areas). Draft NCNP Objectives 1, 2, 3, 5 and 6 are less likely to progress this SEA Objective as they seek new housing, employment, village centre services and facilities, and infrastructure development to meet local needs, which has the potential for negative effects on flooding.
- 4.64 Flood risk was identified as a key sustainability issue at the Scoping stage of this SEA, and flood zones are located along the river boundaries of the NPA. None of the site allocations or proposed development within the Draft NCNP are located within an area of flood risk from rivers, and proposed development is not considered likely to significantly affect flood risk associated with rivers in the wider area with the potential for a residual neutral effect against SEA Objective 7. The SA/SEA process for the SWDP highlights an issue with surface water flooding at the Dilmore Lane/ Station Road site⁶⁰.
- 4.65 In the wider policy framework, Policy SWDP 28 ensures that development manages flood risk, and Policy SWDP 29 requires development to manage surface water run-off through Sustainable Drainage Systems. While these policies are likely to provide sufficient mitigation to ensure that there are no significant effects there is the potential to strengthen the Draft NCNP with regard to flooding. It is recommended that Policy NCD1 (Development and Design Principles) includes flood risk as one of the themes that the Design and Access Statement must address.

⁶⁰ SWDP SA Addendum Report (Sept 2014) Appendix F - Significant Changes to and Newly Proposed Rural Allocations. Available online: http://www.swdevelopmentplan.org/wp-content/uploads/2013/02/SA_AppxFSept2014.pdf

Synergistic and Cumulative Effects

- 4.66 The Draft NCNP is not considered likely to lead to any significant synergistic or cumulative effects in regards to flood risk.

Inter-relationships with other SEA Objectives

- 4.67 Flood Risk is closely linked to communities & health, material assets, biodiversity and geodiversity, soils and geology, climatic factors, water quality and the historic environment. Potential effects on flood risk also have the potential for indirect negative or positive effects on these SEA topics.

SEA Objective 8: To protect and enhance the water environment

Does the Neighbourhood Plan:

- Encourage the efficient use of water?
- Seek to protect and enhance water quality where possible?

SEA Topic: Water

NPPF Paras: 94, 99, 109 & 162

Relevant SWDP SA/SEA Objective: 14

SEA of the Draft Neighbourhood Plan

- 4.68 The Draft NCNP Vision seeks to protect the countryside from inappropriate development, which would include development in the flood zone, and therefore development around the key sensitive water environment areas in the NPA. The Vision could be enhanced by incorporating the aim for environmental sustainability outlined in Objective 4 (which would include the water environment). Draft NCNP Objectives 1, 2, 3, 5 and 6 are less likely to progress this SEA Objective as they seek new housing, employment, village centre services and facilities, and infrastructure development to meet local needs, which has the potential for negative effects on water resources and water quality.
- 4.69 The proposed development within the Draft NCNP will inevitably increase demand on water resources and pressure on Waste Water Treatment Works. As part of the evidence base to inform the SWDP, a Water Cycle Study (WCS) was undertaken. The WCS identified that flows from Fernhill Heath will drain into a terminal pumping station that pumps flows to Droitwich Ladywood Sewage Treatment Works, with the receiving watercourse the River Salwarpe. The most recent update to the WCS concluded that, "whilst there is minimal current spare capacity at this work we do not envisage any issues should additional capacity be required for the small level of development being proposed in the catchment. Should additional treatment capacity be

required in order to accommodate future development above the existing capacity then we do not envisage any issues as there are no land or other physical constraints preventing expansion"⁶¹.

- 4.70 It should be noted that within the NPA, land drains into the catchments of the River Salwarpe and River Severn and neither of these water bodies has reached the required good ecological status under the WFD. Both are classed as being of moderate status and therefore must be brought up to good status by 2027, in line with the objectives of the WFD⁶².
- 4.71 Within the wider policy framework Policy SWDP 30 mitigates any potential effects arising from treatment capacity, ensuring that development proposals demonstrate that there are or will be adequate water supply and water treatment facilities in place to serve the whole development, with the potential for a residual neutral effect against SEA Objective 8. Policy SWDP 29 further requires that development proposals produce a Water Management Statement to demonstrate the management of site drainage and runoff, and requires the management of surface water through Sustainable Drainage Systems. This policy further requires consultation with Severn Trent Water Ltd prior to the submission of a planning application to ensure that appropriate water infrastructure is secured, and requires compliance with the Water Framework Directive which also explores opportunities to help meet its targets. It is considered therefore that the wider policy framework is sufficient to address any potential significant effects on the water environment, and no further mitigation is provided through the Draft NCNP.
- 4.72 It is considered that the existing regulatory processes and policies contained in the SWDP will ensure that there will not be any significant negative effects on water quality as a result of development proposed through the Draft NCNP. There is the potential to strengthen the Draft NCNP and address EA comments on the SEA Screening Opinion by including reference to sustainable drainage options within the Plan.
- 4.73 The WCS identifies that the South Worcestershire region is water stressed, which is reflected in the adopted SWDP. While development proposed or potentially arising through the Draft NCNP may increase pressure on water resources, given the scale of proposed development this is unlikely to be of significance. Within the wider policy framework Policy SWDP 30 ensures that any proposals for development must demonstrate that there are or will be adequate water supply in place to serve development. It also sets limitations on the amount of daily non-recycled water use per household at 105 litres per day, which reduces to 90 litres per day after 1st April 2016, as well as BREEAM

⁶¹ South Worcestershire Water Cycle Study 2014 Update (Jan 2015) Addendum report. Prepared by JBA Consulting. Available online: <http://www.swdevelopmentplan.org/wp-content/uploads/2013/02/EX834.pdf>

⁶² Environment Agency Response to the SEA Screening Opinion (March 2015)

standards for employment and commercial development.
Furthermore, Policy SWDP 30 supports water recycling schemes.

- 4.74 In response to the Screening Opinion and Scoping Stage for this SEA, the EA has advised that the NCNP includes a reference to water efficiency standards. To address the comments from the EA and strengthen the Plan it is recommended that the Plan includes a reference to water efficiency measures as well as a link to SWDP Policy 30.

Synergistic and Cumulative Effects

- 4.75 Development proposed or arising as a result of the NCNP is likely to have negative effects on the water resources and quality as a result of increased abstraction as well as sewerage discharge. Given the scale of proposed development, this is unlikely to be of significance. Cumulatively with development in the surrounding areas there is the potential for major negative effects. However, mitigation provided through Plan policies and existing regulatory processes will ensure that there are no significant cumulative negative effects.

Inter-relationships with other SEA Objectives

- 4.76 The water environment is influenced by and affects a number of the topics considered through this SEA. Potential negative effects on water resources and quality can also have indirect negative effects on communities and human health and the natural environment. Similarly, improvements to water resources and quality can also have benefits for these topics. Given that the appraisal has found that there is not likely to be negative effects on the water environment, it is considered unlikely that there would be any major indirect negative effects on any other topics.

5.0 SEA of the Submission Neighbourhood Plan

Introduction

- 5.1 A number of changes were made to the NCNP as a result of consultation responses received on the Draft Plan. It is important to ensure that the changes are screened through the SEA process to determine if they significantly affect the findings of the SEA for the Draft Plan presented in Section 4 and if further assessment work is required. A screening table was produced to consider all of the key changes proposed. The summary of the findings of this work are presented below with the detail provided in Appendix III of this Environmental Report.

Screening of Changes

- 5.2 The screening found that the majority of proposed changes are minor as they seek to provide further clarification as well as consistency, both internally and with higher level planning policy. Some of the changes help to strengthen policies which could help to enhance potential positive effects as well as improve mitigation. For example, Policy NCRE1 now includes a reference to the Local Heritage Area which overlaps the Fernhill Heath Village Centre and Policy NCD1 now includes a reference to Secured by Design Standards. A number of policies have been deleted; however, as the policy requirements have been incorporated into other policies the screening found that these changes do not significantly affect the findings of the SEA for the Draft NCNP.
- 5.3 Policy NCH1 has now been split to include more detail with regard to the proposed allocation at Sling Lane/ Old Drive. The screening found that the additional requirements help to strengthen mitigation and could reduce the significance of potential negative effects. The SA screening also noted that the policy no longer makes references to the two allocations proposed in the SWDP at Gwillam's Farm and Dilmore Lane. However, given that they are already allocations proposed in the SWDP their removal from the policy does not affect the findings of the previous SEA work for the Draft NCNP.
- 5.4 A new policy (NCT4) has been added to support proposals for a rail-halt park and ride. The screening found that the inclusion of this new policy does not significantly affect the findings of the SEA for the Draft NCNP as the Plan previously supported the provision of a rail-halt park and ride scheme and this was given due consideration through the assessment.
- 5.5 Overall, the screening concluded that the changes do not significantly affect the findings of the SEA for the Draft NCNP presented in Section 4 of this Report and that no further assessment is necessary at this stage.

6.0 Proposed Monitoring

Introduction

- 6.1 This section discusses indicators and targets to help monitor the effects of the NCNP. Targets and/or indicators for each SEA Objective have been identified to provide a suggested list for discussion, and refined further to consider the effects of the plan, as required by the SEA Directive/ Regulations.

Monitoring Requirements

- 6.2 The NCNP will be monitored and reviewed on an annual basis following its adoption by the Parish Council. The SEA Regulations require that the SEA develops measures for monitoring the significant effects of the Plan. Current SEA guidance states that monitoring will enable Planning Authorities 'to identify unforeseen adverse effects at an early stage and to enable appropriate remedial actions⁶³.' Government Guidance also requires that the monitoring results from the SEA 'should be reported in the local planning authority's Monitoring Report⁶⁴.'
- 6.3 The aim of SEA monitoring is to set a framework to show whether progress is being made towards sustainable development throughout the Local Plan's plan period. This section discusses indicators and targets to help monitor the effects of the Plan. Monitoring arrangements should be designed to:
- highlight significant effects;
 - highlight effects which differ from those that were predicted; and
 - provide a useful source of baseline information for the future.
- 6.4 A number of potential monitoring indicators have been set out in the table below for consideration. These will be progressed and refined, as a result of further assessment and consultation, as the NCNP progresses.

Table 5.1: Potential Targets and Indicators

SEA Objectives		Potential Targets and Indicators
1	To meet the needs of current and future residents	<ul style="list-style-type: none"> ■ Percentage of households rented from the Council or in Housing Association / Registered Social Landlords properties ■ Percentage of new housing which is affordable ■ Average house price compared with average earnings ■ Quality of Life survey ■ Indices of Multiple Deprivation

⁶³ Department for Communities and Local Government (2014) National Planning Practice Guidance - Strategic Environmental Assessment and Sustainability Appraisal. Online at <http://planningguidance.planningportal.gov.uk/blog/guidance/>

⁶⁴ Ibid.

		<ul style="list-style-type: none"> Hectares of new green space created or improved
2	To minimise impacts on the highways network and reduce the need to travel	<ul style="list-style-type: none"> Transport modal split Percentage commute by public transport / private car Average commuting distance Uptake / use of the proposed Park & Ride NO2, SO2, PM10, CO and Ozone emissions monitoring points to measure for any exceedances CO2 per capita
3	To protect and enhance biodiversity	<ul style="list-style-type: none"> Condition of sites Number of Biodiversity Action Plan targets achieved
4	To protect, enhance and manage the character of the landscape	<ul style="list-style-type: none"> % development of previously developed land Hedgerow and / or veteran tree loss
5	To conserve and enhance the historic environment, heritage assets and their settings	<ul style="list-style-type: none"> Number of buildings at risk Conservation Area Appraisal updates and Local Heritage Area Appraisal
6	To protect and enhance soils	<ul style="list-style-type: none"> Total hectares of agricultural land Any mineral sterilisation
7	To reduce and manage flood risk	<ul style="list-style-type: none"> Number of properties at risk from flooding
8	To protect and enhance the water environment	<ul style="list-style-type: none"> Ground water quality Chemical and biological water quality No. / % of new development incorporating Sustainable Drainage Systems

7.0 Next Steps

- 7.1 The NCNP and this Environmental Report will be submitted to Wychavon Council for consideration. If the Council is satisfied that the NCNP and accompanying documents meet the legislative requirements they will be published for consultation for a minimum of six weeks. Following consultation the Plan and accompanying documents will then be submitted for independent Examination.
- 7.2 Any changes to the NCNP as a result of consultation or the independent Examination may need to be screened through the SEA process to determine if they significantly affect the findings of the previous work and further assessment is required.

APPENDIX I:

Final SEA Scoping Report





North Claines
Parish Council

North Claines Neighbourhood Plan

Strategic Environmental Assessment Scoping Report

September 2015

enfusion



North Claines Neighbourhood Plan

Strategic Environmental Assessment Scoping Report

<i>date:</i>	Draft August 2015 Final September 2015	
<i>prepared for:</i>	North Claines Parish Council on behalf of Wychavon District Council	
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1.0 Introduction

- 1.1 North Claines Parish Council (NCPC) is in the process of preparing a Neighbourhood Plan that will set out the vision and help to shape future development and growth in the area. Once adopted, the Neighbourhood Plan will become part of the Local Plan and the policies contained within them are then used in the determination of planning applications. In order for a Neighbourhood Plan to be legally compliant a number of basic conditions need to met¹. One of these basic conditions is whether the Plan is compatible with European Union obligations, which includes Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (often referred to as the Strategic Environmental Assessment (SEA) Directive)².

Strategic Environmental Assessment (SEA)

- 1.2 The objective of the SEA Directive (set out in Article 1), is to provide 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 does this by requiring that an environmental assessment is carried out on plans and programmes that are likely to have significant effects on the environment. The Environmental Assessment of Plans and Programmes Regulations 2004³ [the SEA Regulations] transpose the requirements of the SEA Directive into UK law.
- 1.3 SEA considers the effects of the plan on the environment at the strategic level and sets the context for subsequent project level Environment Impact Assessment (EIA). It aims to predict and evaluate any significant effects of the plan, including the effects of potential alternatives, and to propose appropriate mitigate measures where necessary. SEA also includes the identification of measures to monitor the progress of the plan following adoption and implementation.
- 1.4 In order to determine if a Neighbourhood Plan is likely to have a significant environmental effect it must be assessed (screened) at an early stage of the plan's preparation according to the requirements set out in Regulation 9 of the SEA Regulations. A screening opinion of the emerging draft Neighbourhood Plan was produced by Wychavon District Council and sent to statutory consultees (Natural England, Historic England and the Environment Agency) for comment in March 2015. The screening found that the North Claines Draft Neighbourhood Plan is likely to have a significant environmental effect primarily as a

¹ Localism Act 2011.

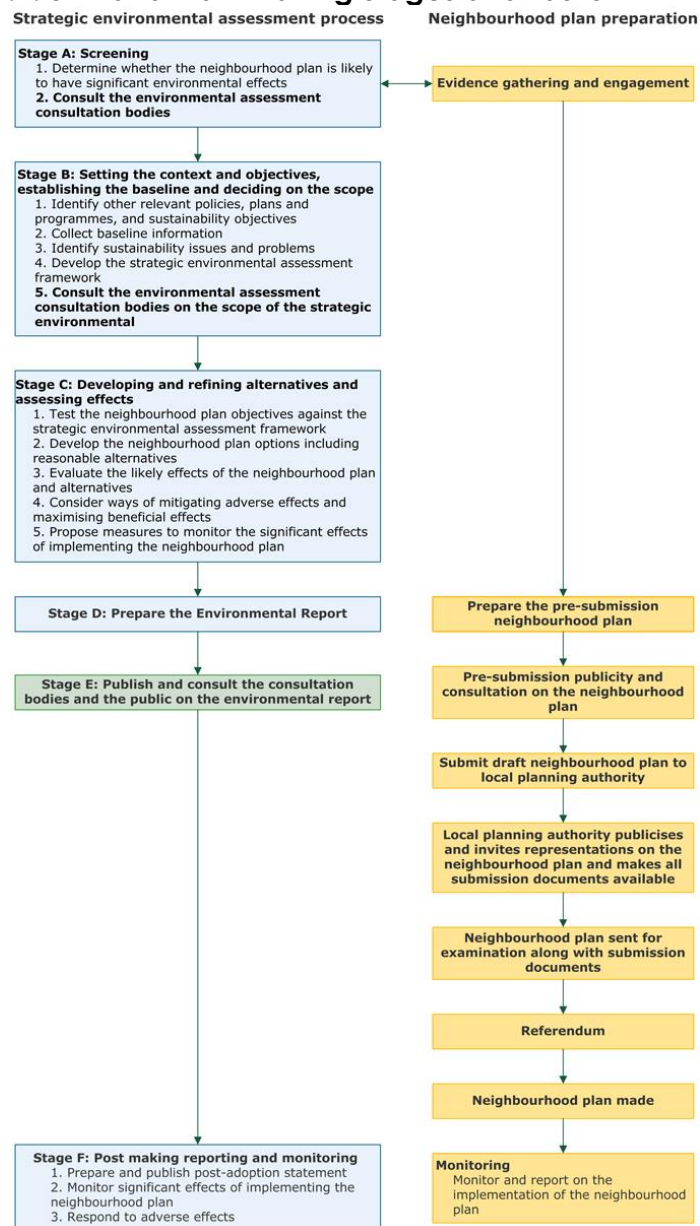
² EU Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment. Available online: <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32001L0042>

³ The Environmental Assessment of Plans and Programmes Regulations 2004. Available online: <http://www.legislation.gov.uk/uksi/2004/1633/contents/made>

result of the potential for development at Sling Lane/Old Drive as well as proposals for a combined primary school, and rail-based park and ride service. Following the review of responses from statutory consultees it was determined that the North Claines Neighbourhood Plan will require a full SEA and an environmental report must be prepared in accordance with paragraphs (2) and (3) of Regulation 12 of the SEA Regulations.

- 1.5 Government guidance⁴ outlines a number of stages that are required in undertaking a SEA and which will need to be carried out as a Neighbourhood Plan is being prepared. These stages presented in the figure below.

Figure 1.1: SEA and Plan-Making Stages and Tasks



⁴ National Planning Practice Guidance: Strategic environmental assessment and sustainability appraisal

Scoping Method

- 1.6 This Scoping Report addresses Stage B of the process and sets out the approach and method for the subsequent Stages C to F. Government guidance⁵ sets out the following tasks for Stage B:
- **Task B1:** Identifying other relevant plans, programmes and sustainability objectives
 - **Task B2:** collecting baseline information
 - **Task B3:** environmental issues and problems
 - **Task B4:** Developing the SEA Framework
 - **Task B5:** Consulting on the scope of the SEA
- 1.7 Scoping is an initial stage in the SEA process that compiles background information which is then used to identify key environmental issues. The key issues inform the development of objectives that are used in the later stages of the SEA to assess the effects of the plan. This Report presents the findings of the Scoping Stage and outlines the next steps for the SEA of the North Claines Neighbourhood Plan.

Structure of this Report

- 1.8 Following this introductory Section 1, this report is structured into five further sections:
- **Section 2** outlines the review of other key plans and programmes (Task B1).
 - **Section 3** sets out the summary characteristics and baseline information along with any data limitations (Task B2);
 - **Section 4** sets out the key environmental issues and SEA Framework (Tasks B3 & B4);
 - **Section 5** sets out the proposed method for the subsequent stages of the SEA Process (Stages C to D); and
 - **Section 6** outlines consultation arrangements and next steps (Task B5).

⁵ Ibid.

2.0 Plans and Programmes Review

Introduction

- 2.1 In order to establish a clear scope for the SEA of the North Claines Neighbourhood Plan, it is necessary (and a requirement of SEA) to review and develop an understanding of the wider range of plans and programmes that are relevant to the Plan. This includes International, European, National, Regional, and Local level policies, plans and strategies. Summarising the aspirations of other relevant policies, plans, programmes and sustainability objectives promotes systematic identification of the ways in which the Neighbourhood Plan could help fulfil them.
- 2.2 This task was undertaken for the Sustainability Appraisal (SA) incorporating SEA of the South Worcestershire Development Plan (SWDP), presented in Appendix 1 of the SA Scoping Report published in 2007⁶. This work was then updated in 2011 and 2012, with the most recent Plans and Programmes Review (PP Review) update presented in Appendix 9 of the Pre-Submission SA Report published in 2012⁷.
- 2.3 Government guidance⁸ states that the SEA of a Neighbourhood Plan, *"does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the neighbourhood plan"*. It is therefore not considered necessary to duplicate all the information provided in the Plans and Programmes Review for the SA of the SWDP.
- 2.4 A focused number of plans and programmes have been reviewed below, which are appropriate to the level of plan-making and reflect the work already carried out through the SA/SEA of the SWDP.

Key Plans and Programmes

The National Planning Policy Framework (2012)

- 2.5 The National Planning Policy Framework (NPPF) is the overarching policy framework for the delivery of sustainable development across England, and is underpinned by a presumption in favour of sustainable development. The NPPF must be taken into account in the preparation of local and neighbourhood plans. The purpose of the planning system is to contribute to the achievement of sustainable development. The National Planning Policy Framework⁹ (paragraph 7) states that:

⁶ http://www.swdevelopmentplan.org/?page_id=254

⁷ Ibid.

⁸ National Planning Practice Guidance: Strategic environmental assessment and sustainability appraisal

⁹ <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

"There are three dimensions to sustainable development - economic, social and environmental - which give rise to the need for the planning system to perform a number of roles".

- 2.6 These roles include meeting the needs (employment, housing and infrastructure) of the District as well as protecting and enhancing the environment. The NPPF (paragraph 8) states that:

"These roles should not be undertaken in isolation because they are mutually dependent".

- 2.7 The NPPF sets out twelve core land-use planning principles that should underpin both plan-making and decision-taking. One of these twelve principles state that planning should:

"be genuinely plan-led, empowering local people to shape their surroundings, with succinct local and neighbourhood plans setting out a positive vision for the future of the area. Plans should be kept up-to-date, and be based on joint working and co-operation to address larger than local issues. They should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency";

- 2.8 In para 184 the NPPF states that neighbourhood plans must be in general conformity with the strategic policies of the Local Plan, which in this case is the saved policies of the Wychavon District Local Plan¹⁰ (WDLP) (adopted June 2006) as well as the emerging South Worcestershire Development Plan¹¹ (SWDP). Neighbourhood Plans should reflect these policies and as well as plan positively to support them. Once a Neighbourhood Plan has demonstrated its general conformity with these policies and is brought into force, the policies it contains take precedence over existing non-strategic policies in the higher level Plans for that neighbourhood, where they are in conflict (Para 185 of the NPPF). Once the SWDP (see below) is adopted it will form part of the higher level policy and supersede the saved policies in the WDLP.

- 2.9 The North Claines Neighbourhood Plan should draw upon the NPPF, and reflect the national priorities for new development as well as be in conformity with the saved policies of the WDLP and once adopted, the policies in the SWDP.

Wychavon District Local Plan

- 2.10 There are a number of saved policies within the adopted WDLP (2006) that the North Claines Neighbourhood Plan will need to be in general conformity with¹². The most relevant of these policies are as follows:

¹⁰ <http://www.wychavon.gov.uk/local-plan>

¹¹ <http://www.swdevelopmentplan.org/>

¹² <http://www.wychavon.gov.uk/local-plan>

- Policy GD1: Location Strategy for New Development - New development up to 2011 will be accommodated within defined development boundaries and/or allocated sites within the main built up areas of Droitwich Spa, Evesham and Pershore and in some villages.
- Policy SR1: Housing Land Supply - The plan identifies how the residual housing requirements are to be met. This is a combination of windfall sites and new allocations. An allocation is identified at Morton House in Fernhill Heath for 20 dwellings (of which 6 are affordable). However, this has not come forward for residential development. Instead the former nursing home has been demolished following the approval of a scheme for a new 66 bed care home (ref. 13/01827).
- Policy SR7: Development in the Green Belt - The policy follows national planning policy previously within PPG2 and now within NPPF.
- Policy SR9: Areas of Development Restraint - Land at Fernhill Heath (between Sling Lane and Old Drive) is designated as ADR. This land is safeguarded and will only be released when it is required for development in a future review of the Local Plan. ADR land was identified to meet possible longer term development needs beyond 2011.

2.11 There are also a number of non-strategic saved policies of relevance to the Neighbourhood Plan as well as the SEA. These include:

- Policy RES4: Conserving Water Resources
- Policy ENV1: Landscape Character
- Policy ENV5: Sites of Regional or Local Wildlife Importance
- Policy ENV6: Protected Species
- Policy ENV7: Protection of Wider Biodiversity
- Policy ENV10: Sites of Archaeological Significance
- Policy ENV11: Historic Parks and Gardens
- Policy ENV12: Conservation Areas (General)
- Policy ENV14: Settings of Listed Buildings
- Policy ENV17: Development in Areas of High Flood Risk
- Policy ENV18: Development in Areas of Low to Medium Flood Risk
- Policy ENV19: Surface Water Run-Off
- Policy ENV22: Contaminated and Unstable Land
- Policy COM12: Provision of Public Open Space
- Policy COM13: Protection of open space and recreation buildings and land in towns and villages
- Policy COM14: Specialist sport and recreation facilities in the countryside
- Policy COM15: Waterways
- Policy SUR1: Built Design
- Policy SUR2: Landscape Design

South Worcestershire Development Plan

- 2.12 Wychavon District Council (WDC), along with Malvern Hills District Council (MHDC) and Worcester City Council (WCC) are preparing a joint South Worcestershire Development Plan (SWDP). Once adopted the SWDP will form part of the higher level local policy and it will supersede the saved policies in the adopted Wychavon District Local Plan (2006).
- 2.13 In May 2013, the three South Worcestershire Councils (SWCs) submitted the South Worcestershire Development Plan (SWDP) (January 2013) for independent examination in accordance with Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012. Stage 1 hearings were held in October 2013 and the Inspector's Interim Conclusions (IC-EX/400b¹³) included concern that there was not a reliable basis for identifying the level of housing need in South Worcestershire over the Plan period. The SWCs were asked to undertake further analysis in order to derive an objective assessment of housing need (OAHN) over the Plan period.
- 2.14 The Stage 1 hearings reconvened in March 2014 and the Inspector's Further Interim Conclusions recommended that the SWCs adopt an OAHN of 28,370 dwellings. This was an increase of 5,170 dwellings above the housing figure of 23,200 presented in the Submission SWDP. The SWCs issued a call for sites that resulted in some 500 sites being nominated by early April 2014. Following further work on the overall need for housing and potential sites to accommodate growth the SWCs published a Schedule of Proposed Modifications in Oct 2014.
- 2.15 Stage 2 hearings will held from February to June 2015 and considered policies, which includes proposed site allocations in the Main Towns and Villages. As a result of these hearing sessions there will be a number of further proposed modifications; however, at this stage they not yet been published.
- 2.16 The SWDP (taking into account any proposed modifications published) proposes the delivery 28,400 new dwellings and 280 ha of employment land up to 2030 (Policy SWDP3) within the Plan area. It proposes that Wychavon District will accommodate 10,600 new dwellings and 120 ha of employment of this total overall level of growth. Policy SWDP 2 sets out the development strategy and settlement hierarchy, with Fernhill Heath identified (in Annex D of the SWDP) as a Category 2 village whose role is predominately aimed at meeting locally identified housing and employment needs. Category 2 villages are identified as being suited to accommodate market and affordable housing needs alongside limited employment for local needs.

¹³ Available on SWDP examination webpage
http://www.swdevelopmentplan.org/?page_id=5393

- 2.17 Policy SWDP 60 (Category 2 Villages) proposes the provision of 120 new dwellings at Dilmore Lane/ Station Road in Fernhill Heath (Ref (SWDP60/16). The policy also requires the inclusion of land as part of this development to provide a new primary school and that delivery will be dependent on additional housing development brought forward either through neighbourhood planning or the review of the SWDP in 2019 - 20.
- 2.18 The SWDP contains a variety of other policies that seek to minimise the impacts of proposed development and protect and enhance the landscape, open/green space (including green infrastructure), heritage, biodiversity, water, air and soils. Once the SWDP is adopted, these policies will replace the saved policies within the WDLP that were outlined earlier in this Section.

3.0 Baseline Information Summary

Introduction

- 3.1 The SEA Directive requires the collation of baseline information to provide a background to, and evidence base for, identifying sustainability problems and opportunities in the Borough and providing the basis for predicting and monitoring effects of the North Claines Neighbourhood Plan. To make judgements about how the emerging content of the Neighbourhood Plan will progress or hinder sustainable development, it is essential to understand the economic, environmental and social circumstances in the Plan area today and their likely evolution in the future. The aim is to collect only relevant and sufficient data on the present and future state of the Plan area to allow the potential effects of the Neighbourhood Plan to be adequately predicted.
- 3.2 This task was undertaken for SA incorporating SEA of the South Worcestershire Development Plan (SWDP), presented in Appendix 2 of the SA Scoping Report published in 2007¹⁴. This work was then updated in 2011 and 2012, with the most recent Baseline Information update presented in Appendix 9 of the Pre-Submission SA Report published in 2012¹⁵.
- 3.3 The SEA Guidance provided by Government¹⁶ proposes a practical approach to data collection, recognising that information may not yet be available and that information gaps for future improvements should be reported as well as the need to consider uncertainties in data. Collection of baseline information should be continuous as the SEA process guides plan making and as new information becomes available.
- 3.4 A summary of the key collated baseline information is provided below, which is appropriate to the level of plan-making and builds on the work already carried out through the SA/SEA of the SWDP.

Biodiversity, Flora & Fauna

- 3.5 The Neighbourhood Plan Area contains a number of locally important non-statutory designated sites for nature conservation, which includes the River Severn Local Wildlife Site (LWS) and Droitwich Canal LWS along with the River Severn Special Wildlife Site (SWS) and River Salwarpe SWS. The Plan area also contains a number of Biodiversity Action Plan priority habitats, including deciduous woodland, semi-improved grassland and woodpasture and parkland¹⁷.

¹⁴ http://www.swdevelopmentplan.org/?page_id=254

¹⁵ Ibid.

¹⁶ Department for Communities and Local Government (2014) National Planning Practice Guidance - Strategic Environmental Assessment and Sustainability Appraisal. Online at <http://planningguidance.planningportal.gov.uk/blog/guidance/>

¹⁷ DEFRA. Magic Map. Available online: <http://www.magic.gov.uk/>

- 3.6 It should also be noted that there is nationally important designated sites within close proximity to the Neighbourhood Plan Area¹⁸. This includes Grimley Brick Pits Site of Special Scientific Interest (SSSI), which is in an unfavourable recovering condition¹⁹ and is separated from the Plan area by the River Severn. It also includes the Northwick Marsh SSSI (currently in a favourable condition²⁰), which is adjacent to a small proportion of the Plan area in the south west.

Population & Health

- 3.7 The total population within Neighbourhood Plan area is 3,520²¹ and there has been an increase of 13% in the resident population since 2001. This is a higher level of increase when compared to the District, which saw a 3.5% increase in population since 2001 and the West Midlands which had a population increase of 6.4%.
- 3.8 Since 2001, there have been significant increases in the number of pensionable adults (33.4%) with a small increase in the number of adults ages 25 to 44 (3.6%). There has also been a 15% increase for the 0 to 24 age group with a 21% increase in the 5 to 15 age group. There has been a smaller increase in the number of working age adults compared to children and young adults and pensionable adults²². This follows national population trends that illustrate an ageing population.
- 3.9 The population of the Neighbourhood Plan area is predominantly white British (95.6%), with the remaining population a mix of ethnicities including white non-British, Asian, black and other ethnic groups.
- 3.10 The principle village in the Neighbourhood Plan area is Fernhill Heath, which has a population of 3,256 and represents 92.5% of the population within the Plan area. The remainder of the population live in the hamlets of Bevere, Lower Town and Hawford and isolated farmsteads. Fernhill Heath Village is predominantly residential although it contains a small level of amenities including a first school and two private schools.
- 3.11 There is a higher proportion of economically active people in the Neighbourhood Plan area than in Wychavon and the West Midlands. Slightly higher levels of residents work full time than in Wychavon and the West Midlands with part time workers being slightly higher again. However, despite there being relatively high levels of economically active residents there are limited opportunities for employment within the Plan area.

¹⁸ Ibid.

¹⁹ NE – Designated Sites. Available online: <https://designatedsites.naturalengland.org.uk/>

²⁰ Ibid.

²¹ 2011 Census

²² Ibid.

- 3.14 47.9% of the population within the Plan area travel less than 10km to get to work, which is higher than the District at 40.5% but lower than the Region at 55.1%. A lower percentage of the population within the Plan area (17%) travel between 10km to 30km to get to work compared to the District (25.8%) and Region (20.4%). However, a higher percentage of the population within the Plan area (14.3%) travel to work over 30km compared to the District (10.9%) and Region (7.1%)²³. It is also important to note that more people in the Neighbourhood Plan area travel to work using a private vehicle (79.8%) compared to the District (76.2%) and Region (71.1%)²⁴.
- 3.15 Indices of Multiple Deprivation (IMD) show that overall, the Plan area (which falls within two lower layer super output areas – 006A & 006B) is not deprived and is better than 80% of all other areas in England²⁵. Compared to the nation the indices show the following:
- Income Deprivation - better than 70% of areas in England
 - Employment - better than 80% of areas in England
 - Health - better than 90% of areas in England.
 - Education - better than 70% of areas of England
 - Barriers to Services - better than 20% of areas of England
 - Living Environment - better than 80% of areas of England
 - Crime - better than 80% of areas of England.

Soil

- 3.16 The majority of land within the Plan area is agricultural comprising of arable land with some pasture for grazing. It is predominantly Grade 3 agricultural land with four areas of Grade 2 land, which is considered best and most versatile agricultural land by the NPPF. There is small area of Grade 4 agricultural land in the north west of the Plan area.

Water

- 3.17 The western and much of the northern boundaries of the Neighbourhood Plan area consist of the rivers Severn and Salwarpe. The Droitwich Canal runs alongside the river Salwarpe. Both rivers have relatively wide floodplains and much of the land alongside these watercourses is functional floodplain. Beyond these areas the rest of the Plan area is in Flood Zone 1 which has a less than 1:1,000 year probability of flooding. There are a number of areas within the Neighbourhood Plan area that are subject to surface water flooding, which includes within the village of Fernhill Heath and wider rural areas²⁶.

²³ Ibid.

²⁴ Ibid.

²⁵ DCLG - Indices of Multiple Deprivation

²⁶ South Worcestershire Authorities (2012) Strategic Flood Risk Assessment Level 2 Update. Prepared by JBA Consulting.

- 3.18 The entire Plan area falls within a Surface Water Safeguarded Zone. A small proportion of the Plan area is covered by a Groundwater Source Protection Zone and there are also a number of minor aquifers of intermediate to high vulnerability. The stretches of the River Severn and River Salwarpe that are close to the Plan boundary are assessed by the EA as having moderate ecological quality²⁷.
- 3.19 The South Worcestershire Water Cycle Study (WCS) (2012 update) assessed the provision of 350 dwellings at Dilmore Lane/ Station Road in Fernhill Heath as potentially having a medium to high impact on sewerage infrastructure. Flows from Fernhill Heath drain to a terminal pumping station that pumps flows to Droitwich Ladywood Sewage Treatment Works. The WCS found that this pumping station does not have sufficient capacity to accept additional flows from the provision of 350 dwellings and development and capacity improvements will be required²⁸. Further updates to the WCS were carried out in 2014²⁹; however, it does not appear that there were any changes to the previous conclusions made with regard to the Dilmore Lane/ Station Road Site. It should be noted that the SWDP proposes 120 dwellings at the site, a reduced level of development than was considered through the WCS.
- 3.19 The WCS concluded that there appears to be no physical restraints to upgrades of the water supply infrastructure based on the previous WCS as well as the comments from Severn Trent Water. Investment will be required to the water supply infrastructure for it to be able to accommodate the proposed level of growth proposed in the SWDP³⁰.

Air & Climatic Factors

- 3.20 There are no Air Quality Management Areas within the Plan area; however, it should be noted that there are two within Worcester City and one within Evesham³¹. The District Council monitors annual mean nitrogen dioxide concentrations at 20 locations, none of which are within the Neighbourhood Plan area³². There is a lack of information with regard to air quality within the Plan area; therefore, it is assumed that traffic, in particular along the A449 and A38, is the main source of atmospheric pollution within the Plan area. It is important to note that since 2005, it is estimated that there has been a reduction in the amount of greenhouse gas emissions being produced within the District³³.

²⁷ Ibid.

²⁸ South Worcestershire Authorities (May 2013) South Worcestershire Water Cycle Study 2012 Update. Prepared by JBA Consulting.

²⁹ South Worcestershire Authorities (Sept 2014) South Worcestershire Water Cycle Study 2014 Update. Prepared by JBA Consulting.

³⁰ Ibid.

³¹ Worcestershire Regulatory Services (2013) Worcestershire Air Quality Action Plan.

³² Worcestershire Regulatory Services (Dec 2014) 2014 Air Quality Progress Report for Wychavon District Council.

³³ UK local authority and regional carbon dioxide emissions national statistics: 2005-2012

Cultural Heritage

- 3.21 There is one Grade II* and sixteen Grade II listed buildings within the Plan area as well as two Conservation Areas; Bevere and the Droitwich Canal. It should be noted that there are also three Conservation Areas adjacent to the Plan area; Claines, Martin Hussingtree and Riverside in Worcester. There are two Locally Important Parks and Gardens (LIHPG) within the Neighbourhood Plan area; Bevere and Hawford. In addition part of Hindlip Hall LIHPG is also located within the Plan area. There are also a number of sites designated as archaeologically sensitive within Worcester to the south of the Neighbourhood Plan area. While there are no Scheduled Monuments within or adjacent to the Plan area, there are a number present near Grimley and Hawford to the north west.

Landscape

- 3.22 The majority of the Plan area falls within the settled farmlands with pastoral land use landscape character area. The areas along the northern and western boundaries around the Rivers Severn and Salwarpe have a riverside meadow character. In the south west there is also an area of settled farmlands on river terrace. Timbered Farmland makes up much of the character of the immediate surrounding area. There are also the two urban character areas of Droitwich to the north east and Worcester to the south³⁴.
- 3.23 The scale and character of the A449 corridor creates a clear break in the landscape, separating the Neighbourhood Plan area in the north from Worcester to the south. Fernhill Heath lies on high ground to the north with a mixed character of historic housing and large areas of 20th Century suburban development. To the north, east and west of the village the landscape becomes increasingly rural with rolling agricultural land defined by hedgerows, trees and pockets of woodland. To the west the low lying land is defined by the historic parkland and isolated dwellings within Bevere and the floodplain character of the River Severn.
- 3.24 The West Midlands Green Belt lies along the southern and eastern edges of the Plan area. Its purpose is primarily to prevent the coalescence of Fernhill Heath with Worcester. It should also be noted that there are two protected areas of open space within Fernhill Heath; the Burn and Teasel Way.

Material Assets (Transport, Minerals and Waste Infrastructure)

- 3.25 The Plan area is well served by existing road infrastructure with the A449 providing connections to Worcester and Junction 6 of the M5 as well as Kidderminster to the north. The A38 provides links up to Droitwich Spa in the north.

³⁴ Worcestershire County Council (2011) Landscape Character Assessment. Available online: http://www.worcestershire.gov.uk/info/20014/planning/1006/landscape_character_assessment

- 3.26 The Oxford, Worcester and Wolverhampton rail line passes through the Plan area; however, there is no station within the Plan area this point in time with the nearest stations in Worcester. Three bus services (355, 144 & 144A and 303) run through the Plan area, which provide regular daily local connections between Bevere, Droitwich, Claines, Fernhill Heath and Kidderminster. National Cycle Network Route 46 passes through the Plan area and provides a route from Worcester to Droitwich.
- 3.27 There are no current or past mineral sites within the Plan area; however, the County Council have identified significant deposits of sand and gravel within the Plan area³⁵. There are currently no operating waste management facilities/sites within the Plan area³⁶.

Evolution without the Neighbourhood Plan

- 3.28 Without the implementation of the Neighbourhood Plan it is unlikely that there would be any significant differences in the current baseline information set out above. The SWDP already proposes development within the Neighbourhood Plan area and contains policies that seek to protect and enhance biodiversity, landscape, and heritage - and seek the provision of associated infrastructure, including community facilities/services and open/green space. Despite this, the Neighbourhood Plan does provide an opportunity to ensure that the environmental issues of key importance to the Parish are given more detailed consideration through the planning process and decision-making. It is therefore considered that some of the existing trends for the Parish identified above, are more likely to be addressed with the implementation of the Neighbourhood Plan.

³⁵ Worcestershire County Council (2015) Analysis of Minerals Resources. Available online: http://www.worcestershire.gov.uk/downloads/download/85/analysis_of_mineral_resources

³⁶ Worcestershire County Council – Waste Sites Mapping. Available online: <http://gis.worcestershire.gov.uk/website/WasteCoreStrategy/>

4.0 Key Environmental Issues & SEA Framework

Key Environmental Issues

- 4.1 It is important to distil the key environmental issues and opportunities from the collated baseline information and the review of plans and programmes, as the SEA Objectives are derived to address the key environmental issues outlined for the Plan area.
- 4.2 The key sustainability issues for the wider SWDP area were presented in Section 3 of the Pre-Submission SA Report published in 2012³⁷. These included:
- The provision of quality affordable housing to meet housing needs in Worcester City, the key settlements and surrounding rural area.
 - High levels of commuting and reliance on the private car for transport.
 - Improving the transport infrastructure, in particular the availability of public transport in rural areas.
 - Opportunities to stimulate the local economy through development of technological skills and diversification, including for the rural economy.
 - Protecting and enhancing open/ green space and promoting Green Infrastructure in new developments to support community and wider biodiversity interests.
 - Flood risk is an ongoing issue for key settlements, sustainable management of water resources should be an integral part of all new development.
 - Opportunities to incorporate good practice sustainable design, including renewable energy into new development to reduce and minimise the carbon footprint of the plan area.
- 4.3 The key sustainability issues identified for the SWDP area along with the review of plans and programmes presented in Section 2 of this Report, baseline information presented in Section 3 and responses received from statutory consultees on the Screening Opinion (March 2015), have informed the identification of key environmental issues for the North Claines Neighbourhood Plan area, which are set out below:
- **Changing population** - significant increases in the number of adults over 65 and children aged 5 to 15 years will change requirements for housing accommodation and increase pressure on residential care, health care and education provision and other amenities and services.
 - **High levels of commuting and reliance on the private car** - lack of employment within the Plan area itself and opportunities to improve access to sustainable transport modes and links to the employment areas in the north of Worcester City. Opportunities to provide

³⁷ http://www.swdevelopmentplan.org/?page_id=254

greater employment opportunities within the Plan area and improve access to sustainable transport.

- **Transport infrastructure** - the public have raised concerns through consultation on the emerging Neighbourhood Plan with regard to the impacts of further development on the highways network and the improvements needed to transport infrastructure, including footpaths/cycleways.
- **Designated biodiversity** - of local importance within the Plan area and national importance in close proximity. In response to the Screening Opinion (March 2015) NE stated that the key site that could be potentially affected by the Neighbourhood Plan is the Northwick march SSSI. Opportunities to enhance habitats, in particular connectivity between functioning habitats.
- **Rural Landscape Character** - the public have raised concerns through consultation on the emerging Neighbourhood Plan with regard to the loss of countryside and the need to retain the rural identity and character of the Plan area.
- **Designated heritage assets** - within and surrounding the Plan area, including Conservation Areas and Listed Buildings. The public have raised concerns through consultation on the emerging Neighbourhood Plan with regard to the potential impacts of further development on the historic setting of the Plan area. Opportunities to improve access and signage to heritage assets where possible.
- **Best and most versatile agricultural land** - is present within the Plan area and should be protected where possible.
- **Flood Risk** - areas within the Plan area should be avoided and flood risk reduced and mitigated where necessary.
- **Increased pressure on water resources and wastewater treatment capacity** - which could have implications for water levels and quality.

SEA Framework

- 4.4 The SEA Framework provides the basis by which the environmental effects of the Neighbourhood Plan will be described, analysed and compared. The SA/SEA Framework developed for the higher level SWDP is presented in Section 2 of the Pre-Submission SA Report published in 2012³⁸ and helped to inform the development of SEA Objectives for the Neighbourhood Plan.
- 4.5 The SEA Framework is presented below in Table 4.1 and has been developed to address the key issues identified earlier in this Section. It includes a number of objectives, elaborated by decision making criteria, which are linked to SEA topics, the NPPF and any relevant SA/SEA Objectives developed for the SA/SEA of the SWDP.

³⁸ http://www.swdevelopmentplan.org/?page_id=254

Table 4.1: The SEA Framework

SEA Objective		Decision Aiding Questions Does the Neighbourhood Plan ...?
1	To meet the needs of current and future residents <ul style="list-style-type: none"> SEA Topics: population, human health NPPF Paras: 14, 16, 17, 50, 54, 55 & 162 Relevant SWDP SA/SEA Objectives: 2, 3 & 8 	<ul style="list-style-type: none"> Ensure that all residents have access to appropriate and affordable housing? Ensure the timely delivery of infrastructure that meets the needs of new and existing development? Ensure provision of community facilities (cultural, health, social, education, recreation) to meet residents needs?
2	To minimise impacts on the highways network reduce the need to travel <ul style="list-style-type: none"> SEA Topics: population, human health, air, material assets & climatic factors NPPF Paras: 29 - 46 Relevant SWDP SA/SEA Objectives: 7, 9 & 13 	<ul style="list-style-type: none"> Seek to improve access to sustainable transport modes, including walking and cycling routes? Seek to improve employment opportunities within the Plan area? Seek to improve the sustainable transport links within the Plan area as well as to employment opportunities and services/facilities in the north of Worcester City? Ensure that the impacts of further development on the highways network are minimised and appropriate mitigation provided where necessary?
3	To protect and enhance biodiversity <ul style="list-style-type: none"> SEA Topics: biodiversity, flora & fauna NPPF Paras: 109 -125 Relevant SWDP SA/SEA Objective: 10 	<ul style="list-style-type: none"> Protect and enhance locally and nationally designated biodiversity sites within the influence of the Plan? Protect and enhance important habitats and species where possible? Protect and enhance habitat connectivity where possible?
4	To protect, enhance and manage the character of the landscape <ul style="list-style-type: none"> SEA Topic: Landscape NPPF Paras: 109 -125 Relevant SWDP SA/SEA Objective: 11 	<ul style="list-style-type: none"> Protect and enhance the rural character of the Plan area? Protect the Green Belt and reduce the potential for coalescence? Protect and enhance the townscape and setting of settlements within the Plan area?
5	To conserve and enhance the historic environment , heritage assets and their settings <ul style="list-style-type: none"> SEA Topic: Cultural heritage NPPF Paras: 126 -141 Relevant SWDP SA/SEA Objective: 12 	<ul style="list-style-type: none"> Conserve and/or enhance heritage assets and the historic environment? Improve the quality of the historic environment? Provide for increased access to and enjoyment of the historic environment?

6	To protect and enhance soils <ul style="list-style-type: none"> ■ SEA Topic: Soil ■ NPPF Paras: 109 & 112 ■ Relevant SWDP SA/SEA Objective: 13 	<ul style="list-style-type: none"> ■ Seek to use poorer quality land in preference to that of higher quality, in particular best and most versatile agricultural land? ■ Encourage enhanced local food production and security?
7	To reduce and manage flood risk <ul style="list-style-type: none"> ■ SEA Topic: Water & climatic factors ■ NPPF Paras: 94, 99 - 104 ■ Relevant SWDP SA/SEA Objective: 14 	<ul style="list-style-type: none"> ■ Ensure that development is directed away from areas of high flood risk? ■ Ensure that development does not increase flood risk elsewhere? ■ Seek the incorporation of sustainable drainage measures where possible?
8	To protect and enhance the water environment <ul style="list-style-type: none"> ■ SEA Topic: Water ■ NPPF Paras: 94, 99, 109 & 162 ■ Relevant SWDP SA/SEA Objective: 14 	<ul style="list-style-type: none"> ■ Encourage the efficient use of water? ■ Seek to protect and enhance water quality where possible?

5.0 Proposed Methods

- 5.1 This section explains the proposed approach and methods for the SEA of the North Claines Neighbourhood Plan.

SEA of the Draft Neighbourhood Plan

- 5.2 The SEA Framework presented in Table 4.1 will form the basis for appraising the Draft Neighbourhood Plan and any reasonable alternatives. The SEA of the Draft Plan, including policies and any proposed site allocations, will be structured under the SEA Objectives, which have been linked to topics in the SEA Directive, paragraphs in the NPPF and any relevant SA/SEA Objectives developed for the SA/SEA of the SWDP. This will provide a framework and structure to evaluate the likely significant effects of the Draft Neighbourhood Plan against the objectives.
- 5.3 An assessment commentary will be provided for each of the SEA Objectives, which will be divided into a number of sub-headings to ensure that each aspect of the emerging Plan is considered as well as the interrelationships between SEA Objectives/topics and cumulative effects of the Plan as a whole. This method allows the SEA to focus on the areas of the Draft Plan that are likely to have significant effects and provide further detail. It also allows for the consideration of mitigation measures that may be provided. An example of a topic and sub-headings is provided below in Figure 5.1 below.

Figure 5.1: SEA Objective and Sub-headings

SEA Objective 5: To protect and enhance the significance and setting of heritage assets

- SEA Topic: Cultural heritage
- NPPF Paras: 126 -141
- Relevant SWDP SA/SEA Objective: 12

SEA of the Draft Neighbourhood Plan & Alternatives

Assessment commentary that considers the nature and significance of effects, including their duration.

Synergistic and Cumulative Effects

Assessment commentary that considers any potential synergistic and cumulative effects.

Inter-relationships with other SEA Objectives

Commentary that sets out the inter-relationships with other SEA Objectives

- 5.4 The assessment will be undertaken using professional judgment, supported by the baseline information and evidence for the Plan, as well as any other relevant information sources available. The nature of the likely effects (including positive/negative, duration, permanent/temporary, secondary, cumulative and synergistic) will be described, together with any uncertainty noted. Evidence will be cited where applicable and a commentary provided and suggestions for mitigation or enhancement made where relevant. SEA is informed by the best available information and data; however, data gaps and uncertainties exist and it is not always possible to accurately predict effects at a strategic level of assessment.
- 5.5 The findings of the assessment will be set out in an Environmental Report that will accompany the Draft Neighbourhood Plan on public consultation.

How will the SEA Inform the Decision-Making Process?

- 5.6 SEA is an assessment tool that helps to inform decision-making but it is not the sole basis for a decision. The Parish Council will consider the findings of the SEA alongside the wider evidence base to inform the development of the emerging Plan. Where necessary, the Environmental Report will clearly set out the reasons for the selection or rejection of alternatives in plan-making.

6.0 Consultation & Next Steps

- 6.1 A Draft Scoping Report was sent to statutory consultees (Environment Agency, Natural England and Historic England) for comment from 11 August to 15 September 2015. The responses received are presented in Appendix I of this Final Scoping Report. Natural England and Historic England are happy with the content of the Scoping Report and stated that it contains sufficient detail and is suitably proportionate for the SEA of the North Claines Neighbourhood Plan. The Environment Agency re-submitted comments that were previously made in relation to the SEA Screening Opinion for the North Claines Neighbourhood Plan in March 2015.
- 6.2 The responses received from statutory consultees have been taken into account when finalising this Scoping Report and SEA Framework. They will also be taken into account through the ongoing SEA of the Neighbourhood Plan. The Scoping Stage will be followed by the production of an Environmental Report to accompany the Draft Neighbourhood Plan on consultation.

APPENDIX I:

Responses Received from Statutory Consultees



Date: 15 September 2015
Our ref: 162418
Your ref: North Claines NP SEA



Alastair Peattie
Enfusion Ltd
BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Mr Peattie

Planning consultation: North Claines Neighbourhood Plan SEA Scoping Report

Location: North Claines Parish, Wychavon District, Worcestershire

Thank you for your consultation on the above dated 11 August 2015 which was received by Natural England on 12 August 2015.

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.

The Conservation of Habitats and Species Regulations (as amended) 2010;
The Wildlife and Countryside Act (as amended) 1981;
Natural Environment and Rural Communities Act 2006
The Countryside Rights of Way Act 2000

The North Claines Neighbourhood Plan SEA Scoping Report highlights the importance of the local sites within it and also ensures that Sites of Special Scientific Interest (SSSIs) are also identified where there is a potential risk from development in the North Claines Neighbourhood Plan area. The proposed way forward also looks to appropriately assess the impacts on these sites as part of the process of finalising the plan.

Natural England are therefore happy with the content of this report.

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 Liz Appleyard on 03000602852. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Liz Appleyard
Lead Adviser – Planning. South Mercia Sustainable Development team



Historic England

Alastair Peattie
Principal Environmental Planner
Enfusion Ltd.
Treenwood House
Rowden Lane
Bradford-on-Avon
Wiltshire
BA15 2AU

Our ref: 1486
Your ref:

Telephone
0121
6256887 Fax

25 August 2015

Dear Alastair

NORTH CLAINES NEIGHBOURHOOD PLAN- SEA SCOPING REPORT CONSULTATION

Thank you for your consultation received on the 11th August 2015 and the request to review the SEA Scoping Report for the above Neighbourhood Plan.

Historic England commends the approach taken that we consider is carefully detailed and suitably proportionate. It covers a suitably wide range of areas and topics including a good appreciation of the Historic Environment and consideration of the range of Heritage Assets that may be susceptible to future impacts.

In conclusion, overall Historic England consider the SEA Scoping to be a positive document that demonstrates good practice and will be of great assistance in relation to Plan production.

Should you wish to discuss any points within this letter, or if there are issues about this Neighbourhood Plan Area where the historic environment is likely to be of particular interest, please do not hesitate to contact me.

Yours faithfully



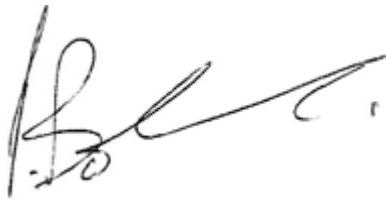
Historic England, 8th Floor, The Axis, 10 Holliday Street, Birmingham B1 1TG

Telephone 0121 625 6870 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.





Pete Boland
Historic Places Adviser
E-mail: peter.boland@HistoricEngland.org.uk



Historic England, 8th Floor, The Axis, 10 Holliday Street, Birmingham B1 1TG
Telephone 0121 625 6870 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.



Wychavon District Council
Planning Policy
Civic Centre
Queen Elizabeth Drive
Persnore
WR10 1PT

Our ref: SV/2010/104075/OT-
03/PO1-L01

Date: 31 March 2015

F.A.O: Reiss Sadler

Dear Sir

**STRATEGIC ENVIRONMENTAL ASSESSMENT SCREENING OPINION REQUEST
AND CONSULTATION ON THE PRE-SUBMISSION DRAFT OF THE NORTH
CLAINES NEIGHBOURHOOD PLAN**

Thank you for referring the above consultation on the Draft North Claines Neighbourhood Plan and Strategic Environmental Assessment (SEA) Screening Opinion. We have reviewed the reports submitted and have the following comments to offer at this time:

Strategic Environmental Assessment:

As stated within the information submitted, European Union directive 2001/42/EC requires a Strategic Environment Assessment (SEA) to be undertaken for certain types of plans and programmes that would have 'significant' environmental effect(s). To assist your Council's determination of the SEA Screening opinion, we advise that based on the Screening Report Submitted (dated March 2015), and in consideration of the matters within our remit, the Neighbourhood Plan is considered unlikely to have significant environmental impacts.

Emerging South Worcestershire Development Plan:

The emerging South Worcestershire Development Plan (SWDP) and Proposed Modifications, include two allocated development sites within the North Claines Neighbourhood Plan Area.

The Draft Plan makes reference to the above and in addition Policy NCH1 allocates an additional residential development site at Sling Lane/Old Drive in Fernhill Heath (the site is noted as being allocated as 'safeguarded land' within the Saved Policies of the Wychavon District Local Plan) and notes some small scale infill development will also be allowed to meet local housing needs during the Plan period (2010-2030).

For completeness, we understand at this time, the consultation on the Proposed Modifications arising from the uplift in housing numbers has ended and the Inspector is

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proceeding with the SWDP examination. We are aware that the first of the three Hearings commenced on 24 February 2015 and are ongoing at this time.

Flood Risk / Water Management:

Based on our Flood Map for Planning (Rivers and Sea) the River Severn is located along the western boundary and the River Salwarpe is located along the north-western boundary of the Neighbourhood Plan Area, both are classified as 'Main River'. There are also a small number of 'ordinary watercourses' located within and adjacent to the Plan Area.

The Flood Map also illustrates the floodplain (Flood Zones 2 and 3) of both the River Severn and Salwarpe. Please note not all watercourses have not been modelled on our Flood Map, as the Map primarily shows flooding from main rivers, not ordinary watercourses with a catchment of less than 3km².

In the spirit of the flood risk Sequential Test, we would welcome a reference to ensure that there will be no built development in the areas liable to flooding i.e. Flood Zone 2 and 3, as defined in the South Worcestershire Strategic Flood Risk Assessment (SFRA) as amended (December 2012) and/or a site specific Flood Risk Assessment (FRA), or within 8 metres from the top of bank of any Main River. Cross reference to Policy SWDP 28: 'Management of Flood Risk' could be included to indicate any requirements for any development proposals.

We would also welcome a reference to SuDS design standards and the types of options available to reduce flood risk, improve water quality (contributing to wider Water Framework Directive (WFD) objectives) and improve ecology. Whilst, the detail would also be informed by discussion with the South Worcestershire Land Drainage Partnership, we include the following wording to assist: opportunities, where appropriate, should help to conserve and enhance watercourses and riverside habitats. Where necessary, this should be through management and mitigation measures for the improvement and/or enhancement of water quality and habitat of any aquatic environment in or adjoining the development site.

Water Quality / Water Resource:

Within the North Claines area, land drains to the following WFD water catchments:

- River Salwarpe (confluence of Elmbridge Brook to confluence of River Severn), Water Body Reference GB109054044710; and
- River Severn (confluence of River Stour to confluence of River Teme), Water Body Reference GB109054049144.

Neither of these water bodies has reached the required good ecological status. Both are classed as being of moderate status and therefore must be brought up to good status by 2027, in line with the objectives of the WFD.

As part of the evidence base used to inform the SWDP, a Water Cycle Study (WCS) was undertaken by JBA Consulting (dated September 2010, most recently updated January 2015). We understand that the sewage treatment works (STWs) catchment that Fernhill Heath falls into is Droitwich Ladywood, the receiving watercourse of such is the River Salwarpe, as outlined above.

The WCS confirms that *"flows from Fernhill Heath will drain into a terminal pumping station that pumps flows to Droitwich Ladywood STW. This pumping station does not have sufficient capacity to accept additional flows and capacity improvements are required. Hydraulic modelling is required to inform the extent of the upgrades"*. With

regards to Droitwich Ladywood STW the WCS states *“Comparison of current measured dry weather flow against the consented dry weather flow and current quality performance assessments indicate there is limited spare capacity at this treatment works. Whilst there is minimal current spare capacity at this work we do not envisage any issues should additional capacity be required for the small level of development being proposed in the catchment. Should additional treatment capacity be required in order to accommodate future development above the existing capacity then we do not envisage any issues as there are no land or other physical constraints preventing expansion.”*

Whilst the Plan should be informed by a robust and credible evidence base to ensure that its policies and any site allocations are justified and effective, an update to the WCS is not considered necessary in this instance but we would refer you to information available in the current WCS and recommend engagement with Severn Trent Water Limited.

The WCS and the current Catchment Abstraction Management Strategy (CAMS) shows South Worcestershire to be a particularly water stressed region as water demand is quite high and water supply is limited. This is reflected within the emerging SWDP. We note the Plan does not refer to the water efficiency standards. Following the recent Housing Standards Review consultation (September 2014) and the proposed revised wording of Policy SWDP30 of the emerging SWDP: ‘Water Resources, Efficiency and Treatment’, we advise that Policy NCD3: Sustainable Design is amended to join up with the SWDP.

For completeness, we would not comment on any energy efficiency measures/requirements which are included within the proposed Policy NCD3 and the Housing Standards Review; our comments relate solely to water efficiency/supply.

I trust that the above is of use to you at this time.

Yours faithfully

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APPENDIX II:

Summary Response to Consultation

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Appendix II: Summary Responses to Consultation**Draft NCNP Environmental Report (October 2015)**

Report Reference	Comment	Response	Action Required
Natural England 18 Dec 2015			
General	Natural England welcomes the production of a SEA. Having reviewed the report Natural England confirms that it meets the requirements of the SEA European Directive and national regulations, and that we concur with its conclusions.	Noted.	None.
Historic England 10 Dec 2015			
General	Regarding the SEA Environmental Report Historic England commends the approach taken that we consider builds constructively upon the SEA Scoping report prepared previously. The report is carefully detailed and suitably proportionate and covers a suitably wide range of areas and topics. It includes a good appreciation of the Historic Environment and consideration of the range of Heritage Assets that may be susceptible to future impacts and successfully addresses the mitigation of those impacts.	Noted.	None.
Gladman			
Alternatives	Gladman consider that the assessment undertaken is not a qualifying SEA, and greater consideration to plan alternatives is required. The NCNP seeks to limit the potential of further housing land being delivered through its use of a restrictive settlement boundary. Gladman consider that the removal of the settlement boundary should be considered as a reasonable alternative and the use of a criteria based approach to test development proposals based on their sustainability merits. Failure to fulfil the requirements of the SEA directive and ensure all reasonable alternatives have been tested may	Policy NCH1A has been amended to state the following, " <i>Proposals for further new residential development beyond the existing development boundaries of Worcester and Fernhill Heath will be resisted unless it is demonstrated that there is not a five year supply of deliverable housing sites and that no other policies within the NCNP and SWDP would preclude development on the site such as Green Belt, Local Green Space or locations at risk of flooding</i> ". It is therefore considered that the NCNP does	None.

Report Reference	Comment	Response	Action Required
	result in the plan being found unable to meet basic condition (f).	not restrict development as further development would be permitted if it is demonstrated that there is not a five year supply of deliverable housing and no other policies in the NCNP and SWDP would preclude development. The removal of the settlement boundary is not considered a reasonable alternative as this would not be in conformity with SWDP Policy 59 (New Housing for Villages) criterion B ii, which requires that housing proposals are located within defined development boundaries.	

APPENDIX III:

Screening of Changes for SEA Significance



Appendix III: Screening of Proposed Changes for SEA Significance

Draft NCNP Policy (October 2015)	Submission Policy (March 2016)	Change	Screening - do the changes, deletions and additions significantly affect the findings of the Draft NCNP Environmental Report (October 2015) or do they give rise to significant environmental effects?
NCH1: New Residential Development	NCH1A: New Residential Development NCH1B: Site Specific Requirements for Sling Lane/Old Drive Residential Allocation	The policy has been split to include more detail around the requirements for the NP allocation. Reference to the SWDP allocation is removed from policy but retained in Reasoned Justification.	The split policy now includes further details (in Policy NCH1B) with regard to the requirements for any development proposal at the Sling Lane/ Old Drive allocation. The additional requirements help to strengthen mitigation and could will reduce the significance of potential negative effects. Overall, it is considered that the proposed changes do not significantly affect the findings of the previous assessment work for the Draft NCNP. It is noted that the policy no longer makes references to the two allocations proposed in the SWDP at Gwillam's Farm and Dilmore Lane. However, given that they are already allocations proposed in the SWDP their removal from the policy does not affect the findings of the previous SEA work for the Draft NCNP.
NCH2: Integrating New Housing	NCH2: New Housing and Infrastructure	The previous policy included design integration and infrastructure integration. The design element has been incorporated into policy NCD1: Development and Design Principles. This policy now concentrates on infrastructure provision associated with new housing.	Minor change that does not significantly affect the findings of the previous assessment work.
NCH3: Housing Mix	NCH3: Housing Mix	The policy incorporates a threshold similar to Policy SWDP 14 to which it will apply. It adds that need should take account of an up-to-date SHMA or Local Housing Needs Survey.	Minor change that seeks to ensure conformity with the SWDP. The changes does not significantly affect the findings of the previous assessment work.
NCH4: Affordable Housing	Deleted	The reasoned justification has been retained and moved to NCH3: Housing Mix. The policy requirement will be dealt with by that policy.	The delivery of affordable homes is now being dealt with through Policy NCH3. The deletion of this policy is therefore considered a minor change and does not significantly affect the findings of the

Draft NCNP Policy (October 2015)	Submission Policy (March 2016)	Change	Screening - do the changes, deletions and additions significantly affect the findings of the Draft NCNP Environmental Report (October 2015) or do they give rise to significant environmental effects?
			previous assessment work.
NCRE1: Fernhill Heath Village Centre	NCRE1: Fernhill Heath Village Centre	The section on potential projects has been moved to Section 8. Cross reference to Policy NCLE3: Local Heritage Area added as the two designations overlap.	The changes are considered minor and do not significantly affect the findings of the previous assessment work. The inclusion of the reference to Local Heritage Area helps to strengthen the policy and could help to reduce the significance of negative effects on heritage.
NCRE2: Promoting Local Employment Growth	NCRE2: Promoting Local Employment Growth	Wording relating to Green Belt is removed from policy and put into the reasoned justification.	Minor changes that do not significantly affect the findings of the previous assessment work.
NCT1: Transport and Development	NCT1: Transport and Development	Criteria added in relation to layout for all users including emergency services.	The additional criteria helps to strengthen the policy by ensuring that roads, pavements and cycle routes are designed to create a safe and efficient layout for all users, including emergency services. Minor change that does not significantly affect the findings of the previous assessment work.
NCT2: Public Transport	Deleted	Deleted.	The deletion of this policy is not considered to be of significance with regard to the previous assessment work as criteria 4 in Policy NCT1 ensures that development is or can be appropriately accessed by public transport. Policy NCT2 (Sustainable Transport Routes) also supports proposals that seek to improve and extend sustainable transport routes. The changes does not significantly affect the previous assessment work.
NCT3: Environmental Improvement Corridor	NCT3: Environmental Improvement Corridor	'Designated transport' replaced by 'A38'.	Minor change that does not significantly affect the findings of the previous assessment work.
NCT4: Cycle Connections	NCT2: Sustainable Transport Routes	Amended to encompass more than cycle provision. Policy includes a requirement for	The change helps to strengthen the policy as it now covers more than just cycle provision. Overall, the

Draft NCNP Policy (October 2015)	Submission Policy (March 2016)	Change	Screening - do the changes, deletions and additions significantly affect the findings of the Draft NCNP Environmental Report (October 2015) or do they give rise to significant environmental effects?
		mitigation should a development near to a route be considered to increase usage.	proposed changes do not significantly affect the findings of the previous assessment work.
-	NCT4: Fernhill Heath Rail-Halt Park and Ride Facility	Policy added to support text at Paragraphs 7.36 – 7.39 of draft NCNP. Provides a set of criteria that any proposal will need to satisfy. The policy supports the designation on the Key Diagram.	Although not proposed through policy, the potential provision of a park and ride facility was previously considered through the SEA. It is therefore considered that the addition of this policy does not significantly affect the findings of the previous assessment work.
NCLE1: Connections with the Countryside	NCLE1: Connections with the Countryside	First paragraph deleted as it repeated the last paragraph of the policy.	Minor change that does not significantly affect the findings of the previous assessment work.
NCLE2: Local Heritage Assets	NCLE2: Local Heritage Assets	Policy removes reference to designated heritage assets and refers to the significance of non-designated heritage assets. 'Preserved' is amended to 'Conserved'.	Designated heritage assets are already protected through higher level policy, including the SWDP. The change does not therefore significantly affect the findings of the previous assessment work.
NCLE3: Local Heritage Area	NCLE3: Local Heritage Area	No change.	N/A
NCLE4: Green Space	NCLE4: Green Space and Green Infrastructure	Criteria B1 amended to refer to an 'assessment of need' to show that there is a surplus of green space in the area.	Minor change that does not significantly affect the findings of the previous assessment work.
NCLE5: Local Nature Conservation Assets	NCLE5: Local Nature Conservation Assets	No change.	N/A
NCLE6: Trees and Woodland and Development	NCLE6: Trees and Woodland and Development	Remove the minimum thresholds for additional new tree planting. Policy is clearer on where off-site planting would be acceptable.	Minor change that does not significantly affect the findings of the previous assessment work.
NCD1: Development and Design	NCD1: Development and Design Principles	Add section on integration into the existing area previously in Policy NCH2. Add to criteria 5 'the application of secured by	The application of secured by design will have positive benefits for health and wellbeing. Overall, the changes do not significantly affect the findings

Draft NCNP Policy (October 2015)	Submission Policy (March 2016)	Change	Screening - do the changes, deletions and additions significantly affect the findings of the Draft NCNP Environmental Report (October 2015) or do they give rise to significant environmental effects?
Principles		design'.	of the previous assessment work.
NCD2: Detailed Design Elements	NCD2: Detailed Design Elements	Add criteria relating to adequate water supplies for effective firefighting.	Minor change that does not significantly affect the findings of the previous assessment work.
NCD3: Sustainable Design	NCD3: Sustainable Design	Remove reference to 'zero carbon buildings policy'.	Minor change that does not significantly affect the findings of the previous assessment work.
NCC1: Community Infrastructure	NCC1: Community Infrastructure	Criteria added to seek provision of community infrastructure in relation to new residential development.	The changes help to strengthen the policy by ensuring that new residential development should provide appropriate new facilities and infrastructure on site or make contributions for off-site provision. Overall the change does not significantly affect the findings of the previous assessment work.
NCC2: Playing Field Provision	NCC2: Playing Field Provision	No change.	N/A
NCC3: Healthy Communities	NCC3: Healthy Communities	Threshold of 10 or more dwellings added and reference made to GP and dental services. Health and wellbeing referred to the future occupiers of the new developments.	Minor change that does not significantly affect the findings of the previous assessment work.