Strategic Environmental Assessment of the Eckington Neighbourhood Development Plan This document is dated October 2018 an

This document is dated October 2018 and was included in the Reg 14 consultation. The changes as a result of the Reg 14 consultation did not have any material affect on the SEA conclusions.

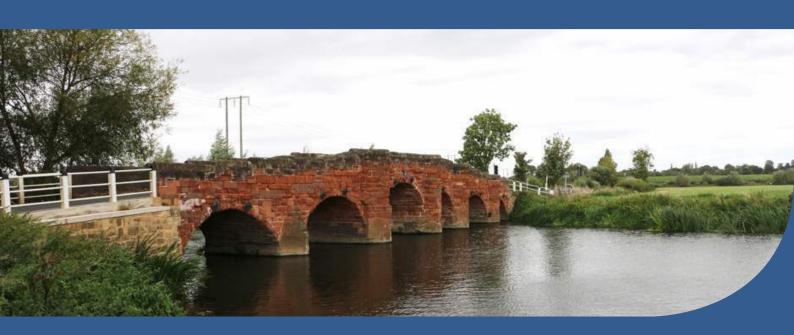
Guidance concerning the SEA of neighbourhood plans from the government (https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal) states 'Further assessment may be required if the changes have not previously been assessed and are likely to give rise to significant effects'. It goes on to say 'Changes that are not significant will not require further environmental assessment work'

We have followed this guidance and not undertaken a new assessment.

Eckington Neighbourhood Plan Steering Group - March 2019

Environmental Report

October 2018







Strategic Environmental Assessment of the Eckington Neighbourhood Plan

Environmental Report

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Front photo: Eckington Bridge by Neil Davidson.



About this report & Notes for readers

Lepus Consulting Ltd (Lepus) has prepared this draft report for the use of Eckington Parish Council. There are a number of limitations, which should be borne in mind when considering the results and conclusions of this report. No party should alter or change this report whatsoever without written permission from Lepus.

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SEA is a tool for predicting potential significant effects. The actual effects may be different from those identified. Prediction of effects is made using an evidence-based approach and incorporates a judgement.

The assessments above are based on the best available information, including that provided to Lepus by the Council and information that is publicly available. No attempt to verify these secondary data sources has been made and they have assumed to be accurate as published.

Every attempt has been made to predict effects as accurately as possible using the available information. Many effects will depend on the size and location of development, building design and construction, proximity to sensitive

receptors such as wildlife sites, conservation areas, flood risk areas and watercourses, and the range of uses taking place. The assessment was prepared in 2018 and is subject to and limited by the information available during this time.

This report has been produced to assess the sustainability effects of the Eckington Neighbourhood Development Plan (NDP) and meets the requirements of the SEA Directive. It is not intended to be a substitute for Environmental Impact Assessment (EIA) or Appropriate Assessment (AA).

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Acronyms

ALC Agricultural Land Classification

AONB Area of Outstanding Natural Beauty

BAP Biodiversity Action Plan

BDA Biodiversity Areas

BMV Best and Most Versatile

CAMS Catchment Abstraction Management Strategy

DCLG Department for Communities and Local Government

DEFRA Department for Environment, Food and Rural Affairs

DPD Development Plan Document

EA Environment AgencyGI Green InfrastructureIRZ Impact Risk ZoneLWS Local Wildlife Site

NDP Neighbourhood Development Plan

NNR National Nature Reserve

NPPF National Planning Policy Framework

ODPM Office of the Deputy Prime Minister

PPG Previously Developed Land
PPG Planning Practice Guidance

PPP Policies, Plans and Programmes

PROW Public Right of Way

SA Sustainability Appraisal

SAC Special Area of Conservation

SEA Strategic Environmental Assessment

SM Scheduled Monument

SPZ Source Protection Zone

STW Seven Trent Water

SWDP South West Development Plan

WHDC Wychavon District Council

Non-Technical Summary

What is Strategic Environmental Assessment?

- N1 Lepus Consulting has prepared this Strategic Environmental Assessment (SEA) Environmental Report of the Eckington Neighbourhood Development Plan (NDP) on behalf of Eckington Parish Council and Wychavon District Council. SEA is the process of informing and influencing the preparation of the NDP to help optimise the environmental performance of the plan.
- N2 This document is known as an Environmental Report (SEA Report). It includes the requirements of an Environmental Report in accordance with the SEA Directive.

Purpose and content of the Environmental Report

- N3 The purpose of this Environmental Report is to:
 - Identify, describe and evaluate the likely significant effect of the NDP on environmental factors;
 - Suggest measures by which any negative effects could be mitigated;
 - Make recommendations to improve the environmental performance of the NDP; and
 - Provide an effective opportunity for statutory consultees, interested
 parties and the public to offer views on any aspect of the SEA process
 that has been carried out to date.
- N4 The Environmental Report contains:
 - An outline of the contents and main objectives of the NDP and its relationship with other relevant plans, programmes and strategies;
 - The SEA Framework of objectives and indicators against which the plan has been assessed;
 - A summary of the reasonable alternatives stage of the NDP;
 - The likely significant effects of the NDP in environmental terms;
 - The measures envisaged to prevent, reduce and as fully as possible offset any significant negative effects which may arise as a result of the plan;
 - A description of the measures envisaged concerning monitoring; and
 - The next steps for the SEA.

N5

This report is one in a series of SEA Reports that have been prepared to facilitate an iterative and informative approach to SEA for the NDP. The stages of plan preparation and the associated SEA work are detailed below.

The screening stage

N6

Wychavon District Council undertook a screening assessment¹ of the Eckington NDP in April 2018 to determine whether the NDP should undergo SEA. This assessment determined that the NDP had the potential to lead to likely negative effects on the environment because the Plan deviates from the land allocations for development made in the South Worcestershire Development Plan (SWDP). Therefore it was screened into the SEA process in accordance with the SEA Directive.

The scoping stage

N7

The first stage of the SEA was to prepare a Scoping Report². The Scoping Report identified relevant policies, plans, and programmes (PPPs) and baseline information relating to environmental issues in the area. The scoping report also set out a series of objectives for environmental protection and a SEA framework, against which the NDP was to be assessed. The SEA Framework included the following SEA Objectives for which indicators and decision-making criteria are identified:

- Biodiversity;
- Cultural heritage;
- Landscape; and
- Natural resources.

Assessment of reasonable alternatives

N8

The assessment of reasonable alternatives refers to the plan-making stage of exploring policy options. The Eckington NDP Steering Group started the planmaking process with the identification of potential development sites, via a 'Call for Sites'. Each reasonable alternative site was appraised in the Reasonable Alternatives Report (Appendix A).

¹ Wychavon District Council (2018) Strategic Environmental Assessment and Habitats Regulation Assessment of the Eckington Neighbourhood Development Plan: Screening Opinion.

² Lepus Consulting (2018) Strategic Environmental Assessment of the Eckington Neighbourhood Development Plan: SEA Scoping Document

Pre-submission NDP

N9

Every policy within the pre-submission NDP and potential site allocation was assessed against the SEA Framework to identify positive and negative impacts on each SEA Objective. The findings are presented in a scoring matrix format and are accompanied by an explanatory narrative on identified effects. The matrix is not a conclusive tool. Its main function is to show visually whether the NDP proposals are likely to bring positive, negative or uncertain effects in relation to the SEA Objectives. The explanatory narrative within the accompanying tables is used to interpret the matrix findings.

N10

The NDP presents the preferred approach, which includes 17 policies and two site allocations for residential development. The NDP group are pursuing this approach based on the various findings and documents comprising their evidence base. The preferred approach which is proposed in the NDP has been appraised in **Chapter 6**. This appraisal is followed by a cumulative effects assessment with recommendations made for avoidance, mitigation and enhancement schemes where appropriate (**Chapters 7 to 10**).

Mitigation and Recommendations

N11

In cases where potentially negative effects have been identified, mitigation suggestions have been given. Mitigation should be considered as part of a sequential hierarchy to deal with adverse effects: avoid, reduce, and then compensate. Mitigation prescriptions might include changes to policy wording, advocating design guides, offsetting biodiversity effects or provision of new supporting GI. In the case of this SEA Report, mitigation has been supplied to help address potential negative effects in the assessment process so that, if possible, positive or no residual affects remain.

Monitoring

N12

Chapter 11 of the SEA Report explains why there should be a monitoring programme for measuring the NDP's implementation in relation to the areas where the SEA has identified negative effects, and where opportunities for an improvement in environmental performance may arise. Monitoring for the SEA could be integrated with other monitoring processes carried out by South Worcestershire District Council.

Conclusions

N13

The SEA has identified both positive and negative environmental effects caused by the NDP. However, through applying a suite of mitigation and enhancement measures, it is possible to ensure that the residual significant negative effects are overcome and positive effects are enhanced. Effects are summarised in **Table N.1.**

Next Steps

N14

This Environmental Report (ER) will be published alongside the pre-submission NDP and a period of consultation will follow, providing the opportunity for individuals, businesses and other organisations to submit representations regarding the ER. Wychavon District Council will consider whether the plan is suitable to submit to an independent examiner. If changes to the NDP result in the need for further SEA work, this will need to be undertaken prior to being submitted to the examiner. If the examiner deems the NDP to meet the basic conditions set out in the Town and Country Planning Act³ (as amended), it will be subject to local referendum. If over 50% of votes are in favour of the NDP, the NDP will be adopted as part of the development plan.

Table N.1: Anticipated residual effects of the NDP post mitigation

Topic	Residual effects	
Biodiversity, flora and fauna	 Policies within the NDP provide protection for a number of green spaces within the plan area. This will help to protect low value ecological habitat and ensure that wildlife corridors in these areas are maintained. Whilst there will be a minor loss of green space due to development at allocated sites, it is anticipated that impacts on biodiversity will be minimised through the implementation of relevant wildlife legislation, best practice and biodiversity policies set out in the National Planning Policy Framework⁴ (NPPF) and the South Worcestershire Development Plan Document (SWDP). This will ensure that biodiversity is protected and opportunities for enhancement sought. 	
Cultural Heritage	 It is anticipated that there will be a change to the setting of features of cultural heritage importance due to development at the allocated sites. Impacts associated with this are anticipated to be negligible due to the implementation of housing and environment policies summarised below. Housing policies, which promote implementation of the Eckington Village Design Statement, and environment polices within the NDP will ensure that future development is sensitively designed to minimise effects on the setting of historical features within the village. Impacts on below ground features of archaeological importance are anticipated. However this impact is concluded to be negligible due to the requirement to adoption policies set out in the SWDP which seek to protect and enhance features of cultural heritage importance. 	
Landscape	 It is anticipated that there will be a change in the local character of the village as a result of development at allocated sites. This may affect views for users of the Cotswold Area of Outstanding Natural Beauty (AONB), Public Rights 	

³ Town and Country Planning Act 1990. Available at: https://www.legislation.gov.uk/ukpga/1990/8/contents

4

⁴ National Planning Policy Framework (2018). Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/74 0441/National_Planning_Policy_Framework_web_accessible_version.pdf

of Way (PRoW) and residents within the village itself. However the implementation of policies set out in the NDP (summarised below) will ensure that these impacts will be negligible
 NDP environment and housing policies which promote implementation of the Eckington Village Design Statement, prevent incursion of development into the countryside, safeguard viewpoints for PRoW users and protect the setting of the Cotswold AONB will ensure that any future development within Eckington will be sensitive to local landscape character
 The NDP is anticipated to direct residential development away from areas at risk of fluvial flooding.
 It is anticipated that the NDP will result in development within areas at high risk of surface water flooding. This is likely to exacerbate local surface water flooding issues. However the implementation of policies set out in the SWDP in relation to site drainage and the use of Sustainable Urban Drainage Systems (SuDS) will reduce this impact to one of negligible significance.
 It is considered that as a result of development proposed in the NDP (in the form of the allocations) there will be a net reduction in Best and Most Versatile (BMV) soils. However given the overall scale of development proposed this effect is considered to be negligible.

1 Introduction

1.1 Introduction

1.1.1 Lepus Consulting is conducting a Strategic Environmental Assessment (SEA) of the Eckington Pre-Submission Neighbourhood Development Plan (NDP), on behalf of Eckington Parish Council. SEA is the process of informing and influencing the progression of development plan documents (DPDs) to maximise the environmental credentials of the plan. This report should be considered through the on-going evolution of the NDP.

1.1.2 This document constitutes the SEA for the NDP and represents an Environmental Report under the requirements of the SEA Directive. This represents Stage C of SEA (see **Figure 1.1**), according to the Office of the Deputy Prime Minister's (ODPM's) (2005) A Practical Guide to the SEA Directive⁵. This report also documents Stage B of SEA, developing and refining alternatives and assessing effects.

1.1.3 SEA is the process of informing local development plans to maximise their environmental value. SEA is a statutory requirement for local development plan documents. SEA is also one of the 'tests of soundness' that planning inspectors use to evaluate the soundness of development plan documents (DPDs), according to the Environmental Assessment of Plans and Programmes Regulations, 2004 (the SEA Regulations). The key objective of SEA is to promote a high level of environmental protection. The SEA is an objective assessment that helps to inform the identification of preferred options and the best way of implementing these with regards to environmental factors, but it does not necessarily dictate what these will be.

1.1.4 Sustainability Appraisal (SA) is a UK-specific procedure used to appraise the sustainability impacts and effects of development plans in the UK. SA is not required for NDPs.

⁵ ODPM (2005) A Practical Guide to the Strategic Environmental Assessment Directive

1.2 Purpose of this report

1.2.1 This report has been prepared to help inform the Eckington Steering Group's preparation of the NDP. It is not the role of the SEA to decide which is the most appropriate form of the NDP, but instead to provide an assessment of the alternatives which should be given due consideration in the decision-making process and identify best performing options.

1.2.2 Article 5(1) of the SEA Directive states:

'Where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. The information to be given for this purpose is referred to in Annex I.'

1.2.3 Planning Practice Guidance (PPG) Paragraph: 018 Reference ID: 11-018-20140306 states:

'Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable.'

1.3 History of the Eckington NDP

- 1.3.1 The creation of neighbourhood plans started with the Government's Localism Act which came into effect in April 2012. The Act sets out a series of measures to shift power away from central government and towards local people. One of the Localism Act's key components is the Neighbourhood Plan; a new tier in planning policy which enables local people to shape the development of the community in which they live.
- 1.3.2 Approval to prepare the Plan was given by Wychavon District Council (WHDC) in March 2015 through the approval of the application to designate the NDP area which was based on the Parish boundary. Evidence gathering for this Plan has methodically and openly followed a process with the emphasis on extensive community engagement and researching and assessing the facts.

- 1.3.3 The Eckington NDP Steering Group is formed of representatives from the Parish. Following its creation in October 2014 a number of surveys were undertaken to collect views on what residents would like to change about the area. These surveys included a household questionnaire, a business survey, a community facility managers' survey, a community groups' survey and a 'place check' survey. The results of these surveys were used to create a set of planning objectives which the NDP Steering Group believed reflected most of the major planning concerns in the community, culminating in the Pre Submission Plan.
- 1.3.4 The NDP will be published for consultation to provide an opportunity for the public and local organisations to comment and give feedback.
- 1.3.5 After consultation, responses will be taken into account and used to prepare a Pre-Submission Plan. This version of the plan will be subject to inspection by an independent examiner. If the examiner approves the NDP it will be subject to a local referendum. If 50% or more of people voting in the referendum support the plan, the NDP will be adopted. Once adopted, planning decisions in the area will be made in accordance with the NDP and the South Worcestershire Development Plan (SWDP).

1.4 The SEA process

- 1.4.1 The European Union Directive 2001/42/EC or 'SEA Directive' applies to a wide range of public plans and programmes on land use, energy, waste, agriculture, transport etc. (see Article 3(2) of the Directive for other plan or programme types). The SEA procedure can be summarised as follows: an environmental report is prepared in which the likely significant effects on the environment and the reasonable alternatives of the proposed plan or programme are identified. The public and the relevant environmental authorities are informed and consulted on the draft plan or programme and the environmental report prepared. Further details on methodology are explained in **Chapter 3**.
- 1.4.2 The SEA Directive has been transposed into English law by the SEA Regulations. Detailed guidance of these regulations can be found in the Government publication 'A Practical Guide to the Strategic Environmental Assessment Directive' (ODPM, 2005).

- 1.4.3 Under the requirements of the SEA Directive and Regulations, specific types of plans that set the framework for the future development consent of projects, must be subject to an environmental assessment.
- 1.4.4 Where a NDP could have significant environmental effects, it may fall within the scope of the SEA Regulations and so require a SEA. One of the basic conditions that will be tested by the independent examiner is whether the making of the Eckington NDP is compatible with European obligations.
- 1.4.5 Whether a NDP requires a SEA, and (if so) the level of detail needed, will depend on what is proposed in the Pre Submission Plan. A SEA may be required, for example, where:
 - The Eckington area contains sensitive natural or heritage assets that may be affected by the proposals in the plan; or
 - The Eckington NDP may have significant environmental effects that have not already been considered and dealt with through a SA of higher order plans.
- 1.4.6 The key stages of NDP preparation and their relationship with the SEA process are shown in **Figure 1.1**, which is taken from National PPG produced by the Department for Communities and Local Government (DCLG).

1.5 Best Practice Guidance

1.5.1 A range of guidance documents has been utilised in preparing the SEA of the Eckington NDP. These are presented in **Box 1.1**.

Box 1.1: Best Practice Guidance for SEA

Lepus follows national guidance and best practice standards set out for SEA, including:

- European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plans and programmes on the environment
- Office of the Deputy Prime Minister (September 2005): A Practical Guide to the SEA Directive
- Department for Communities and Local Government (2018) National Planning Policy
 Framework
- Department for Communities and Local Government (2015) Planning Practice Guidance [online], available at:
 http://planningguidance.planningportal.gov.uk/blog/guidance/

1.6 Structure of the NDP

- 1.6.1 The pre-submission NDP is presented in 13 sections, as listed below:
 - Section 1: Introduction;
 - Section 2: About Eckington;
 - Section 3: The Neighborhood Plan; and
 - Section 4: Key Issues;
 - Section 5: Vision and Objectives;
 - Section 6: Summary of Plan;
 - Section 7: Introduction to Policies;
 - Section 8: Housing;
 - Section 9: Allocation of Sites;
 - Section 10: Community;
 - Section 11: Economy;
 - Section 12: Environment;
 - Section 13: Implementation;
 - Section 14: Glossary;
 - Section 15: Acknowledgements;
 - Section 15: Annexed Documents; and
 - Section 16: Appendices.
- 1.6.2 **Sections 8 12** contain the policies that were subject to assessment through the SEA process, which are presented in **Table 1.1**. They are related to four themes; housing, community, economy and environment.

1.7 Meeting the SEA Directive requirements

1.7.1 **Table 1.2** includes the requirements of the SEA Directive and shows where they have been met within the SEA process.

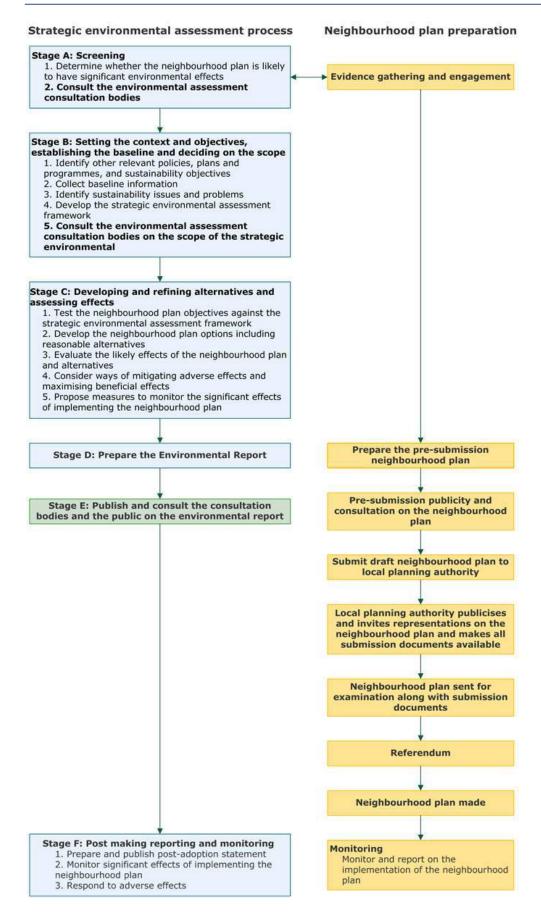


Figure 1.1: The Key Stages of SEA in Neighbourhood Planning (DCLG 2015)

Table 1.1: List of NDP policies in the NDP

Policy Reference	Policy Name	
Housing	Housing	
H1	Manageable Homes	
H2	Retirement Homes	
Н3	Housing Density	
H4	Windfall Sites	
H5	Scale of Developments	
Н6	Control of Future Development	
H7	Village Design Statement	
Н8	Off Street Parking	
Н9	Protecting existing off-street parking	
H10	Sites allocated for development	
H11	Development Conditions - Roman Meadow 2 / Pershore Road	
H12	Development Conditions - Jarvis Street	
Community		
C1	New Community Facilities	
C2	Community Facilities Pershore Road	
C3	Community Facilities - Jarvis Street / School Lane Area	
C4	Village Hall	
Environment		
EN1	Key Landscapes	

Table 1.2: Meeting the requirements of the SEA Directive

Requirement for Environmental Report	Location
Include an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes.	SEA Scoping Report: Chapter 1 and Chapters 3 to 6 SEA Report: Chapter 1
Include information on the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme.	SEA Scoping Report: Chapters 3 to 6
Describe the environmental characteristics of areas likely to be significantly affected	SEA Scoping Report: Chapters 3 to 6
Specify any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	SEA Scoping Report: Chapters 3 to 6 (Key Issues boxes)
Consider the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	SEA Scoping Report: Chapters 3 to 6 Scoping Report: Appendix B SEA Report: Chapter 2
Assess the likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, and cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	SEA Report: Chapters 7 to 10
Give details of the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	SEA Report: Chapters 7 to 10
Give an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	SEA Report: Chapter 4
Include a description of the measures envisaged concerning monitoring.	SEA Report Chapter 11
Include a non-technical summary of the information provided.	SEA Report Non-Technical Summary

1.8 How the NDP SEA has evolved

1.8.1 This report is part of a series of reports that have been prepared to facilitate an iterative and informative approach to SEA.

1.8.3

1.8.5

Stage A: Screening

1.8.2 WHDC undertook a screening assessment of the Neighbourhood Plan in April 2018⁶, to determine whether the NDP should be screened into the SEA process. This forms Stage A of the SEA process.

This assessment determined that the NDP had the potential to lead to likely negative effects on the environment because the Plan deviates from the land allocations for development made in the SWDP. Therefore it was screened into the SEA process in accordance with the SEA Directive.

Stage B: Scoping

1.8.4 Preparing a Scoping Report represents Stage B of the SEA process (see Figure 1.1). Once screened into the process, the first stage of the SEA was to prepare a Scoping Report to outline the environmental issues in Eckington and use this information to develop a framework against which to assess environmental impacts of the plan.

The Scoping Report identified relevant plans, policies and programmes (PPPs) relating to environmental issues in Eckington. It also set out a series of objectives for environmental protection and a SEA framework, against which the NDP is to be assessed. This is discussed in more detail in **Chapter 2**.

Stage C: Developing and Refining Alternatives and Assessing Effects

1.8.6 The Eckington NDP Steering Group put forward a number of sites which were assessed for significant environment effects. The outcome of this assessment was presented to the Steering Group for consideration. The findings from these assessments are presented in **Chapter 4** and at **Appendix A**.

⁶ Wychavon District Council (2018) Strategic Environmental Assessment and Habitats Regulation Assessment of the Eckington Neighbourhood Development Plan: Screening Opinion.

1.8.8

1.9

Stage D: Prepare the Environmental Report

1.8.7 This report presents an SEA of the Pre Submission Plan. This represents Stage D of the SEA process, as described in **Figure 1.1** and also documents Stage C, as described in **Chapter 4**. The Pre Submission NDP will be consulted on and any comments will be taken into account going forward (Stage E). If the comments result in changes to the NDP, the SEA work may need to be re-visited to assess the effects of any changes to the plan.

Once the NDP has been formally adopted, an SEA Post-Adoption Statement will be prepared, in order to demonstrate how environmental considerations highlighted in the SEA process were taken into consideration during the preparation of the plan. The Post-Adoption Statement will fulfil Stage F of the SEA process (see **Figure 1.1**).

Relationship with the South Worcestershire Development Plan

- 1.9.1 The SWDP was adopted on 25th February 2016 and sets out planning policy for Wychavon District, Malvern Hills and Worcester City Councils. This forms the key planning document for South Worcestershire as a whole. The Development Plan is a high-level document, which will form the basis of other development plans in the area.
- 1.9.2 If adopted as a DPD, the NDP will form part of the statutory Development Plan and set out the blueprint for future planning decisions in Eckington.
- 1.9.3 The NDP is complementary to the Development Plan and provides more detailed policies, rather than alternative policies that would negate the Development Plan. The SWDP was subject to an integrated Strategic SA, which assessed the plan for significant effects on sustainability. SA assesses the likely implications of a plan on social and economic factors, as well as environmental effects. Mitigation measures were suggested where negative or uncertain impacts were identified.

2 Scoping

2.1 Introduction

- 2.1.1 The scoping stage represents Stage B of SEA, according to the DCLG (2015) Guidance on SEA for Neighbourhood Plans (**Figure 1.1**). Scoping is the process of deciding the scope and level of detail of an SEA, including the environmental effects and alternatives to be considered, the assessment methods to be used, and the structure and contents of the SEA Report.
- 2.1.2 The purpose of the Scoping Report is to set the criteria for assessment (including the SEA Objectives), and establish the baseline data and other information, including a review of relevant PPPs. The scoping process identifies key issues, highlighting areas of potential concern.
- 2.1.3 The Scoping Report was prepared by Lepus Consulting in October 2018⁷. The Scoping Report was sent to the Environment Agency, Natural England and Historic England for a five week consultation. Responses from these statutory consultees can be seen in **Appendix B**.

2.2 Policies, plans and programmes review

- 2.2.1 A plan or programme may be influenced in various ways by other plans or programmes, or by external environmental protection objectives such as those laid down in policies or legislation. The SEA process takes advantage of potential synergies and addresses any inconsistencies and constraints.
- 2.2.2 The Scoping Report presented an analysis of the objectives of the key PPPs (including legislation) that are relevant to the NDP and the SEA assessment process. These were presented by their geographic relevance, from international to local level.

2.3 Baseline data and information

2.3.1 A key part of the scoping process is the collection of baseline data. The purpose of this exercise is to help identify key issues and opportunities facing the area which might be addressed by the NDP, and to provide an evidence base for the assessment.

⁷ Lepus Consulting (2018) Strategic Environmental Assessment of the Eckington Neighbourhood Development Plan: SEA Scoping Document

2.3.2 The baseline chapters in the Scoping Report (**Chapters 3 to 6**) provided a review of existing environmental conditions within the plan area and their likely evolution in absence of the NDP. One of the purposes of consultation on the Scoping Report was to seek views on whether the data selected was appropriate.

2.4 The SEA Framework

- 2.4.1 The purpose of the SEA Framework is to provide a way of ensuring that the NDP considers the environmental needs of Eckington in terms of its environmental effects. It also enables the environmental effects of the NDP policies to be described, analysed and compared.
- 2.4.2 The SEA Framework consists of environmental objectives, which, where possible, the achievement of which is measurable using indicators. There is no statutory basis for setting objectives but they are a recognised way of considering the environmental effects of a plan and comparing alternatives. The SEA Objectives provide the basis from which effects of the NDP were assessed.
- 2.4.3 The SEA Objectives were developed through the PPP review, the baseline data collection and the key issues identified for the plan area. The SEA topics identified in Annex I (f) of the SEA Directive⁸ were one of the key determinants when considering the SEA Objectives to be used for appraisal purposes. The SEA Objectives seek to reflect each of these influences to ensure the assessment process is robust and thorough. The SEA Framework is presented in **Appendix C**.

⁸ Biodiversity flora and fauna; Population; Human health; Soil; Water, Air; Climatic factors; Material assets; Cultural heritage (including architectural and archaeological heritage); and Landscape.

3 Methodology

3.1 Approach to assessment

3.1.1 The assessment process has used the SEA Framework (**Appendix C** and summary in **Table 3.1**), the review of plans, programmes and policies, and the baseline (including various mapped data sources), as presented in the SEA Scoping Report, to assess each policy and allocation. Assessments have been undertaken using this empirical evidence and, to a lesser extent, expert judgement. The precautionary principle⁹ is applied to all assessments.

Table 3.1: SEA Framework

	Objective	Description
1	Biodiversity	Protect, enhance and manage the flora, fauna and biodiversity assets of Eckington.
2	Cultural Heritage	Protect, enhance and manage heritage assets, including designated and non-designated, as well as features and areas of heritage importance.
2	Landscape	Conserve, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening their distinctiveness.
3	Natural Resources	Protect, enhance and ensure the efficient use of Eckington's land, soils and water.

3.2 Appraisal process

3.2.1 When evaluating significance of effect, the SEA draws on criteria in Annex II of the SEA Directive (see **Box 3.1**) and identifies a significance value using the guide in **Table 3.2**.

⁹ Judgment of 7 September 2004 in case C-127/02 (Waddenzee, paragraph 45).

Box 3.1 Annex II of the SEA Directive

Box 3.1: Annex II of the SEA Directive¹⁰

Criteria for determining the likely significance of effects referred to in Article 3(5) of the SEA Directive

The characteristics of plans and programmes, having regard, in particular, to:

- the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;
- the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
- the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
- environmental problems relevant to the plan or programme; and
- the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste- management or water protection).

Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:

- the probability, duration, frequency and reversibility of the effects;
- the cumulative nature of the effects;
- the transboundary nature of the effects;
- the risks to human health or the environment (e.g. due to accidents);
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- the value and vulnerability of the area likely to be affected due to:
- special natural characteristics or cultural heritage;
- exceeded environmental quality standards or limit values;
- intensive land-use; and

• the effects on areas or landscapes which have a recognised national, Community or international protection status.

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¹⁰ EU Council (2001) Directive 2001/42/EC of the European Parliament and of the Council. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN [Date Accessed: 11/09/18]

Table 3.2: Guide to impact significance matrix

Significance	Definition (not necessarily exhaustive)		
Major Negative 	 The size, nature and location of a reasonable alternative would be likely to: Permanently degrade, diminish or destroy the integrity of a quality receptor, such as a feature of international, national or regional importance; Cause a very high-quality receptor to be permanently diminished; Be unable to be entirely mitigated; Be discordant with the existing setting; and/or Contribute to a cumulative significant effect. 		
Minor Negative -	 The size, nature and location of a reasonable alternative would be likely to: Not quite fit into the existing location or with existing receptor qualities; and/or Affect undesignated yet recognised local receptors. 		
Negligible O	Either no impacts are anticipated, or any impacts are anticipated to be negligible.		
Uncertain +/-	It is entirely uncertain whether impacts would be positive or adverse.		
Minor Positive +	 The size, nature and location of a reasonable alternative would be likely to: Improve undesignated yet recognised receptor qualities at the local scale; Fit into, or with, the existing location and existing receptor qualities; and/or Enable the restoration of valued characteristic features. 		
Major Positive ++	 The size, nature and location of a reasonable alternative would be likely to: Enhance and redefine the location in a positive manner, making a contribution at a national or international scale; Restore valued receptors which were degraded through previous uses; and/or Improve one or more key elements/features/characteristics of a receptor with recognised quality such as a specific international, national or regional designation. 		

3.2.2 A single value from **Table 3.2** is allocated to each SEA Objective for each policy and allocation. Justification for the score is presented in an accompanying narrative assessment text. The assessment of a significant effect is in accordance with the footnote of Annex 1(f) of the SEA Directive, where feasible, which states:

"These effects should include secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects".

- 3.2.3 When selecting a single value to best represent the environmental performance of the relevant SEA Objective, the precautionary principle is used. This is a worst-case scenario approach. If a positive effect is identified in relation to one criterion within the SEA Framework (see the second column of the SEA Framework in **Appendix A**) and a negative effect is identified in relation to another criterion within the same SEA Objective, the overall score will be negative for that objective.
- 3.2.4 The assessment considers, on a strategic basis, the degree to which a location can accommodate change without detrimental effects on known receptors (identified in the baseline).

3.3 Significance

- 3.3.1 Where an environmental impact has been identified, the significance of effect has been categorised as minor or major. **Table 3.2** lists the significance matrix and explains the terms used. The nature of the significant effect can be either positive or negative depending on the type of development and the design and mitigation measures proposed.
- 3.3.2 Each policy and allocation that has been assessed in this report is awarded a score for each SEA Objective in the Framework, as per **Table 3.1**. Scores are not intended to be summed.
- 3.3.3 It is important to note that the scores are high level indicators. The narrative assessment text which details the key decision-making criteria behind each awarded score should always read alongside the score. Assumptions and limitations in **Section 3.8** offer further insight into how each score was arrived at.
- 3.3.4 Significance of effect is a combination of impact sensitivity and magnitude.

3.4 Impact sensitivity

3.4.1 Impact sensitivity is measured though consideration as to how the receiving environment will be impacted by a plan proposal. This includes assessment of the value and vulnerability of the area, whether or not environmental quality standards will be exceeded, and if impacts will affect designated areas or landscapes.

3.4.2 A guide to the range of scales used in the impact significance matrix is presented in **Table 3.3**. For most receptors, sensitivity increases with geographic scale.

Table 3.3: Geographic scales of receptors

Scale	Typical criteria
International/ national	Designations that have an international aspect or consideration of transboundary effects beyond national boundaries. This applies to effects and designations/receptors that have a national or international dimension.
Regional	This includes the regional and sub-regional scale, including county-wide level and regional areas.
Local	This is the district and neighbourhood scale.

3.5 Impact magnitude

3.5.1 Impact magnitude relates to the degree of change the receptor will experience, including the probability, duration, frequency and reversibility of the impact. Impact magnitude is determined based on the susceptibility of a receptor to the type of change that will arise, as well as the value of the affected receptor (see **Table 3.4**).

Table 3.4: Impact Magnitude

Impact magnitude	Typical criteria
High	Likely total loss of or major alteration to the receptor in question; Provision of a new receptor/feature; or The impact is permanent and frequent.
Medium	Partial loss/alteration/improvement to one or more key features; or The impact is one of the following: • Frequent and short-term; • Frequent and reversible; • Long-term (and frequent) and reversible; • Long-term and occasional; or • Permanent and occasional.
Low	Minor loss/alteration/improvement to one or more key features of the receptor; or The impact is one of the following: Reversible and short-term; Reversible and occasional; or Short-term and occasional.

3.6 Predicting effects

3.6.1 SEA is a tool for predicting potential significant effects. Predicting effects relies on an evidence-based approach and incorporates expert judgement. It is often not possible to state with absolute certainty whether effects will occur, as many impacts are influenced by a range of factors such as the design and the success of mitigation measures.

The assessments in this report are based on the best available information, including that provided to us by the NDP Steering Group and information that is publicly available. Every attempt has been made to predict effects as accurately as possible.

3.6.3 SEA operates at a strategic level which uses available secondary data for the relevant SEA Objective. All policies and allocations are assessed in the same way using the same method. Sometimes, in the absence of more detailed information, forecasting the potential impacts of development can require making reasonable assumptions based on the best available data and trends. However, all policies and allocations must be assessed in the same way and any introduction of site-based detail should be made clear in the SEA report as the new data could potentially introduce bias and skew the findings of the assessment process.

3.7 Distances

3.7.1 Where distances have been measured, these are 'as the crow flies' from the furthest edge of the site unless specified otherwise. New residents require access to a range of facilities and amenities. Some distances that are considered to be sustainable in this regard are based on the Barton, Grant and Guise (2010) Shaping Neighbourhoods for Local Health and Global Sustainability¹¹.

3.8 Assessment assumptions

3.8.1 A number of assumptions have been used to help incorporate proportionality to the SEA of policies and allocations.

¹¹ Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability, January 2010

- 3.8.2 In terms of published policy guidance, it is assumed that the following policies will apply to the NDP area and surrounding environments, and have been borne in mind when completing the assessment:
 - Adopted SWDP Policies (February 2016)¹²;
 - The Cotswolds AONB Management Plan (2018)¹³;
 - NPPF (2018)¹⁴ planning policies; and
 - PPG policies.
- 3.8.3 Other assumptions have been applied to the report based on discussions with the plan makers and the client team. These are presented in Table **3.5**.

Table 3.5: Assumptions for each SEA objective

SEA Objective	Assessment Assumptions
Biodiversity	WHDC undertook a screening assessment of the NDP in April 2018 ¹⁵ , to determine whether the NDP would have a likely significant effect on European designated sites in line with the Habitats Regulations ¹⁶ due to the deviation in allocations as set out in the Eckington NDP. This screening report noted that the policies of the SWDP (including allocations) were not considered likely to have a significant adverse effect on the integrity of Bredon Hill SAC, Dixton Wood SAC or Lyppard Grange Ponds SAC due to the location of sites and the presence of more suitable areas of open space available for recreation. As such the screening report concluded that the NDP policies are considered to be in general conformity with the SWDP and, although the draft NDP proposes additional land allocations over and above those in the SWDP, the level of such allocations are considered small enough to not have a significant adverse impact on European Sites. In line with the findings of this screening report significant adverse impacts of the NDP on adjacent European sites are considered to be of negligible significance and are therefore not considered further in this assessment. Where priority habitats and/or species (according to Section 41 of the Natural Environment and Rural Communities (NERC) Act (2006) ¹⁷), European protected
	species (as defined by the Habitats Directive ¹⁸) and the Conservation of Habitats

¹² South Worcestershire Development Plan (2016) Available at: http://www.swdevelopmentplan.org/wp- content/uploads/2016/06/The-Adopted-SWDP-February-2016.pdf [Date Accessed: 30.10.181.

To Cotswold Area of Outstanding Natural Beauty Management Plan 2018 - 2023 (2018). Available at: https://www.cotswoldsaonb.org.uk/wp-content/uploads/2018/10/Cotswolds-AONB-Management-Plan-2018-2023.pdf [Date Accessed: 30.10.18].

¹⁴ National Planning Policy Framework (2018). Available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/74 0441/National Planning Policy Framework web accessible version.pdf [Date Accessed: 30.10.18].
¹⁵ Wychavon District Council (2018) Strategic Environmental Assessment and Habitats Regulation

Assessment of the Eckington Neighbourhood Development Plan: Screening Opinion.

¹⁶ Habitat Regulations, 2017. <u>http://www.legislation.gov.uk/uksi/2017/1012/contents/made</u> [Date Accessed: 29.10.18]

¹⁷ Natural Environment and Rural Communities Act (2006) http://www.legislation.gov.uk/ukpga/2006/16/contents

¹⁸ Habitats Directive,1992. <u>https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:01992L0043-</u> 20070101 [Date Accessed: 29.10.18]

	and Species Regulations 2010 ¹⁹) and nationally protected species (as defined by the Wildlife and Countryside Act 1981(as amended) ²⁰) are present, appropriate surveys and ecology work will be conducted at the planning application stage to ensure accordance with legislative requirements. It is assumed that such species / habitats will receive protection through these legislative processes.
	Development is anticipated to result in the loss of habitat within the footprint of the proposed allocations and loss of adjacent and supporting habitat.
Cultural Heritage	Several of the sites are greenfield land and it is considered to be likely that development at these locations could alter the contribution that views make towards the appreciation of a given heritage asset.
	If a site is in close proximity to a heritage asset, development at that location has the potential to alter the character or setting of the asset, even if the site is not visible from the heritage asset. Impacts on the setting or character of heritage assets will be largely determined by the specific layout and design of development proposals.
	It is assumed that all historic statutory designations, including Listed Buildings and Conservation Areas, will not be lost to development. The effects of a development on the setting of such historic asset designations will depend substantially on design, the details of which being uncertain at this stage.
	Sites containing, or in close proximity to, areas of archaeological interest may benefit from further archaeological assessment to determine potential adverse effects which may not have been revealed by a desk based assessment.
Landscape	Policies and allocations have been assessed in terms of the extent to which they may impact on the character of local landscapes and townscapes as well as the extent to which they may alter views.
	Baseline data on the landscape character has been derived from the National Character Areas. Eckington lies within the Seven and Avon Vales National Character Area ²¹ .
	Within Eckington there are four landscape types as identified in Worcestershire's Landscape Character Assessment (LCA) ²² including Principle Village Farmlands, Principle Wooded Hills, Riverside Meadows and Wooded Hills and Farmland.
Natural Resources	The level of fluvial flood risk present at each site is based on the Environment Agency's flood risk data, such that:
	• Flood Zone 3: 1% - 3.3+% chance of flooding each year;

¹⁹ Conservation of Habitats and Species Regulations 2010.

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http://www.legislation.gov.uk/uksi/2010/490/contents/made [Date Accessed: 29.10.18]

²⁰ Conservation of Habitats and Species Regulations 2017.

http://www.legislation.gov.uk/uksi/2017/1012/contents/made [Date Accessed: 29.10.18]

²¹ Natural England (2014) National Character Areas. Available at:

https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making [Date Accessed: 10/09/18]

Worcestershire County Council (2011) Landscape Character Assessment: Supplementary Guidance. Available at: www.swdevelopmentplan.org/wp.../Landscape_Character_Assessment_Nov2011.pdf [Date Accessed: 07/09/18]

- Flood Zone 2: 0.1% 1% chance of flooding each year; and
- Flood Zone 1: Less than 0.1% chance of flooding each year.

There is the possibility of higher flood risks elsewhere if a site is adjacent to Flood Zones 2 or 3.

Surface water flood risk: Areas of high risk have more than a 3.3% chance of flooding each year, medium risk between 1% - 3.3%, low risk between 0.1% and 1% and very low risk less than a 0.1% chance.

The risk of groundwater flooding is unknown for all sites.

The Agricultural Land Classification (ALC) system forms part of the planning system in England and Wales. It classifies agricultural land into five categories according to versatility and suitability for growing crops. The top three grades, Grade 1, 2 and 3a, are referred to as 'Best and Most Versatile' (BMV) land. Grades 4 and 5 are described as poor quality agricultural land and very poor quality agricultural land. All sites are situated on land with an ALC of Grade 3. It is not known whether this is Grade 3a, which is the best and most versatile agricultural land, or 3b, which is not. In accordance with the Precautionary Principle it has been assumed that they are within Grade 3a.

It is assumed that development on previously developed land (PDL) (brownfield) is preferable, provided that it is not of high environmental value. This is in accordance with the core planning principles of the NPPF²³. There is no PDL at the site unless otherwise stated.

Groundwater Source Protection Zones (SPZs) indicate the risk to groundwater supplies from potentially polluting activities and accidental releases of pollutants. Designed to protect individual groundwater sources, these zones show the risk of contamination from any activities that might cause pollution in the area. In this context they are used to inform pollution prevention measures in areas which are at a higher risk, and to monitor the activities of potential polluting activities nearby.

'The Environment Agency's approach to groundwater protection'²⁴ provides information about managing and protecting groundwater resources.

3.9 Limitations

3.9.1 The assessment of reasonable alternatives is limited in terms of available data resources. For example, up to date ecological surveys and/or landscape and visual impact assessments have not been available.

²³ Department for Communities and Local Government (2012) National Planning Policy Framework. Available at:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf ²⁴ Environment Agency (2018) Approach to Groundwater Protection. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/69 2989/Envirnment-Agency-approach-to-groundwater-protection.pdf [Date Accessed: 22/10/18]

- 3.9.2 Data granularity is sometimes an issue where a dataset does not match the scale of some smaller sites. For example, national character area profiles cover larger areas than the relatively small allocated sites. This restricts the ability of the SEA process to differentiate between sites when assessing their impact on the area profile.
- 3.9.3 All data used is secondary data available from the client team, the NDP group or publicly available web based information. No Historic Environment Record search has been commissioned through South Worcestershire District Council.
- 3.9.4 Properties close to or adjacent to potential development sites were not accessed in order to gain views and evaluate impacts.

3.10 Mitigation

- 3.10.1 Whilst the assessment findings have drawn on the assumptions in **Table**3.5, an assessment has been firstly made excluding detailed mitigation; i.e. additional detail or modification to the policy / site that has been introduced specifically to reduce identified environmental effects of that policy / site. Detailed mitigation is then set out for each negative impact identified and an assessment has to then be made to determine residual impacts following the implementation of mitigation.
- 3.10.2 This approach facilitates transparency to the decision makers.

4 Reasonable Alternatives

4.1 Introduction

4.1.1 The SEA Directive requires that the SEA process considers:

'Reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme' and gives 'an outline of the reasons for selecting the alternatives dealt with' (Article 5.1 and Annex I (h)).

- 4.1.2 In the UK, reasonable alternatives are commonly referred to as 'options'.

 The assessment of reasonable alternatives refers to the plan making process stage of exploring policy options.
- 4.1.3 The role of SEA is to inform the plan making group in their selection and assessment of options. The findings of the SEA can help with refining and further developing these options in an iterative and on-going way. The SEA findings do not form the sole basis for decision-making; other studies, the feasibility of the option and consultation feedback will also contribute to the decision.
- 4.1.4 The results of an SEA may reveal that there is no single, best performing option. Where there is no obvious discernible difference at a strategic scale, the SEA process will record this as an outcome for that particular stage of the assessment process.

- 4.1.5 In the case of a development plan document not fully complying with the NPPF and SEA Regulations, the planning examiner is likely to recommend the plan for withdrawal or suspension. For example, a legal challenge was lodged against Forest Heath District Council in 2011, regarding their proposed Core Strategy. The High Court ruled that the Core Strategy did not give clear reasoning as to why alternative policies that were rejected were deemed unreasonable²⁵. This ruling should guide current best practice and ensure that the reasons for selecting or rejecting alternatives are explained, and that the public should have an effective opportunity to comment on appraisal of alternatives. The SEA report accompanying the plan must refer to, summarise or repeat the reasons that had been given in earlier iterations of the plan and SEA, and these must still be valid.
- 4.1.6 Similarly, the planning examiner raised concerns regarding the Bath and North East Somerset Core Strategy in 2012²⁶. These concerns were centred on the fact that there was weak justification for selecting the preferred policies, particularly as some of the preferred options did not appear to meet the needs identified in the SA/SEA.
- These cases demonstrate the need for transparency in the plan-making 4.1.7 process, including taking the SEA findings into account and drawing on the SEA to justify the preferred options selected.
- The PPG²⁷ states that the environmental report accompanying a 4.1.8 neighbourhood plan should 'outline the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives'.

4.2 Reasonable Alternatives: Sites

4.2.1 The PPG notes that 'reasonable alternatives' are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable'28.

²⁵ Forest Heath Core Strategy High Court Order (2011) Available at: https://www.westsuffolk.gov.uk/planning_Policies/local_plans/upload/B10-FHDC-Core-Strategy-High-Court-Order-04-May-2011.pdf

²⁶Bath and North East Somerset Core Strategy High Court Judgment (2012) https://www.n-somerset.gov.uk/wp-content/uploads/2015/12/high-court-judgement.pdf

²⁷ Department for Communities and Local Government (2015) Planning Practice Guidance Paragraph: 018 Reference ID: 11-018-20140306

²⁸ Ibid.

4.2.2 It also states that 'Proposals in a draft neighbourhood plan, and the reasonable alternatives should be assessed to identify the likely significant effects of the available options. Forecasting and evaluation of the significant effects should help to develop and refine the proposals in the neighbourhood plan'²⁹.

Call for Sites

- 4.2.3 In August 2015 Eckington NDP Steering Group commissioned Foxley Tagg
 Planning Ltd to undertake a 'Call for Sites' exercise in order to identify
 potential sites for inclusion as allocations within the emerging Eckington
 Neighbourhood Plan.
- 4.2.4 Known landowners with sites in or adjacent to the settlement boundary were contacted by Foxley Tagg and notices were placed in the Parish magazine and the local press asking for those with suitable sites to come forward. Submitted sites were visited and assessed by Foxley Tagg, with sites reviewed against general planning principals. The Call for Sites Report³⁰ identifies the outcomes of the site assessment process. This exercise informed the site allocation process by the NDP Steering Group and future consultation with the local community.
- 4.2.5 Nine alternative sites were identified in the Call for Sites process as shown in **Figure 4.1**. These sites were identified as reasonable alternatives for the Eckington NDP. All the sites were therefore assessed as per the methodology set out in **Chapter 3**. The results of this assessment are set out within the Assessment of Reasonable Alternatives Report (**Appendix A**)³¹.

²⁹ Department for Communities and Local Government (2015) Planning Practice Guidance. Paragraph: 037 Reference ID: 11-037-20150209

³⁰ Foxley Tagg Planning (2015) Eckington Call for Sites: Site Assessment Report.

³¹ Lepus Consulting (2018). Assessment of Reasonable Alternatives.



Figure 4.1: Call for Sites map

4.2.6 The scoring matrix for each site assessed in the Reasonable Alternatives Report has been brought together in **Table 4.1**. It notes that this forms an assessment of effects before the consideration of mitigation.

Table 4.1: SEA scoring matrices for reasonable alternative sites assessed in the Reasonable Alternatives Report pre mitigation.

	SEA Objective			
	1	2	3	4
Site Allocation	Biodiversity and Geodiversity	Cultural Heritage	Landscape	Natural Resources
ECK-01	-	-	-	-
ECK-02	-	-	-	
ECK-03	-	-	-	-
ECK-04	-	-	-	-
ECK-05	-	-	-	
ECK-06a	-	0	-	
ECK-06b	-	0	0	
ECK-07	-	-	-	-
ECK-08	0	-	-	

- 4.2.7 In terms of the environmental assessment results, the scoring matrix shows that most sites identified through the 'Call for Sites' perform in a similar way. These similarities are due to the close proximity of the sites to one another and the fact that all sites are proposed for the same land use change: housing.
- 4.2.8 Overall, a single best performing site could not be identified at the reasonable alternatives stage, primarily as all sites would be likely to result in some form of negative impacts on the four SEA objectives.

Roman Meadow 2

4.2.9 The development of Roman Meadow 2 (RM2) was originally outside the scope of the NDP as it was allocated within the SWDP for 20 homes on the site via Policy 60/15. Planning permission was subsequently granted for up to 25 dwellings. This site therefore did not form part of the assessment of Reasonable Alternatives (Appendix A). Analysis of the parish demographics by the NDP Steering Group showed that approximately 20 additional dwellings are required over the plan period to sustain the village school given the declining birth rate and ageing village population (this is over and above the 20 homes set out in the SWDP). Public consultation undertaken as part of the development of the NDP indicated public support for this limited scale development. As such RM2 was brought into the scope of the NDP.

4.2.10

RM2 constitutes a reasonable alternative and as such has been assessed below in line with the methodology proposed in the Reasonable Alternatives Assessment (**Appendix C**). RM2 comprises approximately 1ha of greenfield land and is located to the north of Eckington village, north of Russell Drive. The Site is currently used for agricultural purposes.

Table 4.2: Assessment of RM2 pre mitigation

SEA Objective	Score	Explanation
Biodiversity	-	RM2 is located immediately adjacent to the Eckington Railway Cutting SSSI. The Site is also approximately 1.1km east of the River Avon Local Wildlife Site (LWS) and Special Wildlife Site (SWS). The Site is within an Impact Risk Zone (IRZ) of the SSSI where development of 50 units or more may have a negative impact on the SSSI. As a total of 25 dwellings are proposed at this site within the SWDP, no adverse impact would be expected. Development would result in the loss of approximately 1ha of low value ecological land and associated habitat. A minor negative effect on biodiversity is anticipated.
Cultural Heritage	-	RM2 is located approximately 130m to the north of the Grade II Listed Buildings 'Village Cross' and 'Post Office Stores' and Eckington Conservation Area, these are located to the south of the site. It is considered to be likely that development at this location would alter the setting of these heritage assets and therefore would be likely to have a minor negative impact on the cultural heritage objective.
Landscape	-	It is unlikely that development at RM2 would be visible from the Cotswolds AONB primarily due to the Site being located on the opposite side of Eckington village. However, development here could potentially result in urban sprawl into the surrounding, open countryside to some extent. Development at RM2 would be likely to alter the views for users of the local PRoW network and residents of Russell Drive and Drakes Bridge Road. Therefore, development at this location could potentially have a minor negative impact on the landscape objective.
Natural Resources	-	RM2 is situated on Agricultural Land Class (ALC) Grades 2 soil and therefore is considered to be some of the best and most versatile (BMV) soils in the Parish. All development on greenfield land would result in the permanent and irreversible loss of ecologically and agriculturally valuable soils, but as the Site proposed only covers 1ha of land, it is considered to be likely that development at this location would result in a minor negative impact on the local soils. The Site coincides with Flood Zone 1 so development at this location would be unlikely to place new residents in locations at risk of flooding. A small proportion of the site lies in an area considered to be at low risk of surface water flooding ³² .

³² Environment Agency Surface Water Flood Maps. https://flood-warning-information.service.gov.uk/long-term-flood-risk/map [Date Accessed: 23.10.18].

4.3 Reasonable alternatives: Do Nothing

4.3.1 As part of the assessment of reasonable alternatives consideration has been given to the impact of a do nothing scenario i.e. without implementation of the NDP. This assessment assumes that policies outlined in the SWDP and other high level policies and plans will continue to be implemented.

Table 4.3: Likely evolution of the environment without the adoption of Eckington NDP

SEA Topic	Score	Evolution without the Plan
Biodiversity, flora and fauna	0	Sites designated for their national and international biodiversity value and other sensitive biodiversity features will continue to benefit from legislative protection and protection given through policies set out in the SWDP and the NPPF.
Cultural Heritage	_	In the absence of the NDP, the character and setting of designated and non- designated heritage assets is unlikely to change significantly, primarily due to policies set out in the SWDP. However housing densities are anticipated to be higher in line with SWDP Policies. It is uncertain the extent to which the accessibility, local awareness or setting of heritage assets may be enhanced over time without the NDP.
Landscape	-	The Cotswolds AONB will continue to be proactively and effectively managed by the Cotswold Conservation Board and, in the absence of the NDP, would be likely to be conserved and enhanced through the Cotswold AONB Management Plan 2018 - 2023. In the absence of the NDP, it would be uncertain as to the likely change of distinctive and long-distance countryside views enjoyed by sensitive receptors, which may include local residents and those on the local PRoW network. Policies set out in the SWDP would be likely to protect some views but may not be specific to Eckington Parish and the Cotswolds AONB. Without proactive management to preserve landscape features and open space, the quality of these views could potentially deteriorate over time. In the absence of the NDP, it is likely that local distinctive and rural landscape character would be altered. This is due to the higher housing densities set out in SWDP. Key landscape features would be likely to be preserved in the absence of the NDP through polices set out in the SWDP, although it is uncertain the extent to which specific landscape features of Eckington would be enhanced.
Natural Resources	0	In the absence of the NDP and in line with policies set out in the SWDP, it is considered to be likely that new development would not be allocated in areas at risk of fluvial or surface water flooding and therefore the number of residents at risk of flooding is unlikely to change in the short or medium term. In the long term, climate change will be likely to exacerbate flood risk for local residents to some extent due to long term trends. The EA will continue to pursue water quality improvements for surface and ground water bodies in the Avon Warwickshire catchment. The ecological and chemical status of each waterbody will be likely to improve to some extent over the coming years in line with requirements of the Water Framework Directive.

SEA Topic	Score	Evolution without the Plan
		In the absence of the NDP, the addition of new development in Eckington Parish would be expected to result in the loss of BMV soils.

4.4 Selection of reasonable alternatives

4.4.1 As noted above PPG states that the environmental report accompanying the NDP should outline the reasons alternatives were selected and the reasons the rejected options were not taken forward. **Table 4.4** provides a summary of this process.

Table 4.4: Selection of reasonable alternatives

Reasonable Alternative	Selected / Rejected	Reason for Selection / Rejection ³³
Do Nothing	Rejected	The do nothing alternative would deliver none of the benefits that are enabled by the NDP and are supported by the community. These include strengthening the school by facilitating young families moving into additional new homes in the village (in excess of the number proposed by the SWDP), thus maintaining and nurturing the social vibrancy and economic health of the whole community. It would also result in no growth in the availability of more manageable (low occupancy) homes suitable for older residents. These homes are required to accommodate the aging population of the village and free up larger family homes. This would encourage younger families to move into the village which would in turn ensure the school remains viable.
ECK-01	Rejected	This site is visually prominent as land rises away from the road. The site is open and is not contained by any natural screening and as such the rear aspect of the site bleeds into the open countryside beyond. There is concern regarding additional development in Lower End due to limited access over Drakesbridge Road Railway.
ECK-02	Selected	Pershore Road was considered sustainable, well-related to the settlement and capable of delivering a medium-sized site of the type of dwellings that the NDP wished to deliver. It was considered that the site could deliver a well-thought out, accessible and sensitive scheme, with land being provided to the community by the landowner.
ECK-03	Rejected	The location of this site is considered to be sustainable, and the site has road frontage. However, the road network in this part of the village is narrow with particular difficulties on a tight bend to the west where there is very poor visibility. In addition, this site would result in increased traffic on the road that runs adjacent to the school. The road defines the edge of the settlement in this part of the village. The rear of the site forms part of a larger field parcel. The site is a very prominent site as seen from other parts of the village as such it would not form a discreet development but would be very visual.

³³ Justifications for rejection / selection of alternatives is taken from the 'Call for Sites - Site Assessment Report' (2015) and email from NDP Steering Group dated 11.10.18 and 26.10.18.

Reasonable Alternative	Selected / Rejected	Reason for Selection / Rejection ³³
ECK-04	Rejected	This site fronts on to Nafford Road with potential traffic impacts due to narrow nature of highway. It also presents potential highways concerns regarding the exit from New Road onto Church Street in terms of limited visibility.
ECK-05	Selected	This site as originally defined in the call for sites is sustainable and would represent a good plot for a self-build scheme for a single unit as infill. In agreement with the landowner, the site was subsequently enlarged and now provides a community owned playing field dedicated to school use and up to 6 homes. The revised site is sustainable as a location, well-related to the existing built form of the settlement and does not represent a significant incursion into the open countryside. The provision of land that would benefit the school was considered to be a significant benefit of the site and received huge community support.
ECK-06a	Rejected	The site's location outside the village development boundary would represent a significant extension of the village into open countryside. It does not relate particularly well to the village. This site was later withdrawn by landowner.
ECK-06b	Rejected	The site would not represent a further incursion into the countryside in itself but requires unlocking by site part of 6a which would represent some incursion into open countryside. This site was later withdrawn by landowner.
ECK-07	Rejected	The northern-most part of the site fronting the road is considered suitable for a small-scale residential development. However there are highways concerns regarding additional development in Lower End due to limited access over Drakesbridge Road railway bridge.
ECK-08	Rejected	The site is remote from the village and no pedestrian links exists which prevents suitable connectivity and permeability to ensure the site is sustainable. It is considered that the distance from the village and the topography between the village and the site make this site unsuitable.
RM2	Selected	Following consultations with the landowners it was agreed that the RM2 site would be brought into the scope of the NDP in conjunction with the Pershore Road site (ECK-02). The justification for this was to improve the housing mix and integrate different types of homes across both sites, reduce the disruption caused to the village by staggered developments and enable the infrastructure for both sites to be completed in an efficient and cost effective manner. This approach was supported by residents in the September 2017 consultation event.

5 Preferred Option

- 5.1.1 The following key issues were identified as a result of a detailed analysis of the evidence collected by the Steering Group. These issues were presented to the community during the February 2016 consultation event.
 - Need to attract young families to the village;
 - Need to address the requirements of an ageing population particularly in terms of housing;
 - Need to conserve and protect the important community assets;
 - Need to protect and enhance the rural perspective; and
 - Need to deal with traffic issues.
- 5.1.2 Based on these key issues a vision and objectives for the parish to 2030 were developed which include the following:
 - Objective 1 All new development to prioritise 'manageable' housing that will allow our ageing community to downsize their homes without leaving the village, freeing up underutilised family homes for younger families to come in;
 - Objective 2 -All development to reflect and preserve the diversity of Eckington's built environment as well as be consistent with the current average housing density (13.8 dwellings per hectare, gross) and open access to the countryside;
 - Objective 3 Attract young families to the village by ensuring: the school remains full, effective and vibrant; the attractiveness of the village and direct access to the countryside is preserved; and a vibrant and inclusive community social scene is maintained.
 - Objective 4 Conserve and protect the historical heritage in buildings and monuments;
 - Objective 5 Ensure community facilities are protected and developed and are easily accessible to both young and old with provision for additional services that recognises the needs of both;
 - Objective 6 Support and encourage the development and growth of our diverse range of small businesses;
 - Objective 7 Maintain the 'village feel' in terms of green spaces within the village and protecting the village from sprawl; and
 - Objective 8 Highways and Transport: Address the issue of inadequate provision of parking within the village; and minimise onstreet parking caused by any new development sites.
- 5.1.3 The NDP sets out a series of 17 policies that aim to support the delivery of these objectives.

5.1.6

5.1.7

As noted above the development of Roman Meadow 2 (RM2) was originally outside the scope of the NDP being allocated instead within the SWDP for 20 homes (Policy 60/15). This was planned in line with SWDP policies which recommend 30 dwellings per hectare (net), however noting that consideration should also be given to the character of the local area.

5.1.5 Therefore as part of the work undertaken by the NDP Steering Group the Eckington Village Design Statement was updated in January 2016 (revised in 2017)³⁴. This document showed that the average density of housing within the development boundary is currently 13.8 dwellings per hectare (gross). In order to preserve the character of the village the NDP therefore requires that housing densities should not exceed 15 dwellings per hectare (gross). This figure was supported by residents during public consultation events. It is noted that this figure is less than that set out in the SWDP policies.

Analysis of the parish demographics by the NDP Steering Group indicated that approximately 20 homes are required (in addition to the 20 homes set out in the SWDP) over the plan period in order to help keep the school viable, given the declining birth rate and ageing village population.

Both RM2 and the Pershore Road site (referred to as ECK-02 in the Reasonable Alternatives Report) are within the ownership of the same land owner. It was therefore decided to bring RM2 into the scope of the NDP to allow improvement of the housing mix and integrate different home requirements across both sites, to reduce the disruption caused to the village by staggered developments and to enable the infrastructure for both sites to be completed in an efficient and cost effective manner. Development across these two sites also allowed implementation of lower housing densities as set out in the Eckington Village Design Statement. This will ensure that development is proportionate to the character of the local area.

5.1.8 Community consultation also identified the need to provide the following:

- Improved road safety around the school and recreation centre;
- Provide the school with land to expand;
- Create open spaces;
- Improve car parking; and

³⁴ Eckington Village Design Statement (2017). Annex I of the NDP Document.

 Provide land for future community facilities e.g. potentially relocating the Village Hall in the future.

As a result of the 'Call for Sites' and subsequent planning review, three potential sites were identified. After further consultation, one of the landowners decided that he did not wish to proceed with his offer and withdrew from the process. The two remaining landowners have subsequently worked with the NDP Steering Group to help shape developments that both create the quantity and type of housing required.

5.2 Preferred Approach

- 5.2.1 Within the Pre-Submission NDP, the Steering Group have identified their preferred approach for delivering development in the parish which satisfies local needs in a way that is socially, environmentally and economically sustainable. The NDP Steering Group has set out their justification for this approach, and an overview of how reasonable alternatives have been considered and rejected or selected, in **Table 4.4.**
- 5.2.2 The preferred approach comprises 17 policies and a number of site allocations. The site allocations include the following sites (see **Figure 5.1**):
 - Roman Meadow 2 and Pershore Road. Providing no more than 38 homes in total including 8 affordable residential homes, 6 manageable homes and 5 open market retirement homes. In addition these sites will provide a footway to allow access between the recreation ground and Roman Meadows 2, land to create a 'green buffer' north of the proposed development (PRF1), provision of land to extend the cemetery on Pershore Road (PRF2), the provision of land for an overflow car park for the Recreation Centre (PRF2) and provision of land for a potential future Community Building (PRF2); and
 - Jarvis Street. Providing no more than 6 homes in total of which 4 will be manageable homes. In addition this site will provide new community owned playing fields (part of JS1 and JSF).
- 5.2.3 These sites have been appraised for their likely environmental impacts during the SEA appraisal of reasonable alternatives for sites (**Chapter 4**). Among other factors the findings of these assessments helped inform the NDP steering group's decision-making process on which sites to allocate for development. They decided on a combination of the three sites listed above.

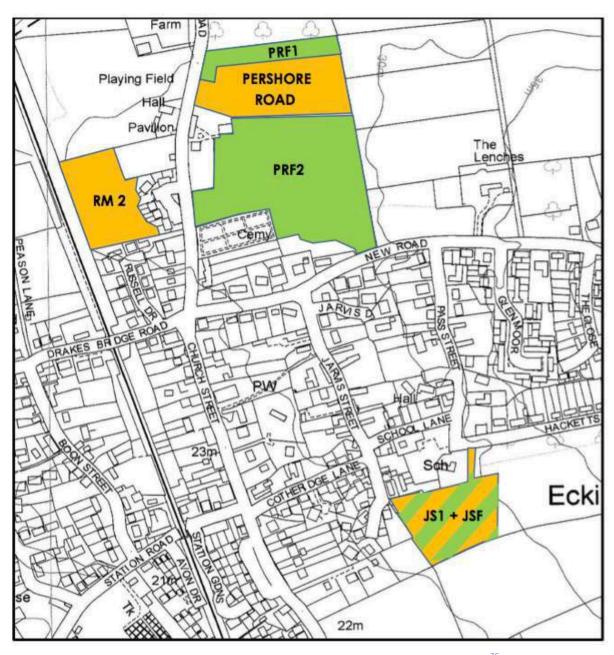


Figure 5.1: Map of site allocations proposed in the NDP (map taken from the NDP) 35

 $^{^{35}}$ Orange shading indicates allocations for housing. Green shading indicates allocations for community land.

6 Assessment of Effects Pre Mitigation

6.1 Introduction

6.1.1 The 17 policies that form the Eckington NDP have been individually assessed against each of the four SEA Objectives. This chapter contains the results of these assessments. The results for each policy can be found in a single line matrix, which displays whether the policy has been assessed positively or negatively against each SEA Objective. The matrices are followed by an explanation of the results. It should be noted that this assessment has been undertaken before the consideration of mitigation. Mitigation is outlined in **Chapters 7 to 10**.

6.2 Policy H1: Manageable Homes

SEA1	SEA2	SEA3	SEA4
Biodiversity	Cultural Heritage	Landscape	Natural Resources
0	0	0	0

6.2.1 This policy focuses on the delivery of more manageable properties that are attractive to older residents in the village. This will help to ensure that future development in Eckington satisfies the housing needs of local residents. It is likely that this policy will have a negligible effect on the SEA Objectives.

6.3 Policy H2: Retirement Homes

SEA1	SEA2	SEA3	SEA4
Biodiversity	Cultural Heritage	Landscape	Natural Resources
0	0	0	0

6.3.1 This policy focuses on the delivery of more manageable properties that are attractive to older residents in the village. This will help to ensure that future development in Eckington satisfies the housing needs of local residents. It is likely that this policy will have a negligible effect on the SEA Objectives.

6.4 Policy H3: Housing Density

SEA1	SEA2	SEA3	SEA4
Biodiversity	Cultural Heritage	Landscape	Natural Resources
0	+	+	0

This policy is aimed at ensuring the housing densities set out in the Eckington Village Design Statement (Annex I of the NDP) are adhered to. This is in order to reflect current housing densities in the village and maintain the existing rural character of the village. It is likely that this policy will therefore have a positive effect on landscape character and in addition the setting of features of cultural heritage importance. Minor positive effects on the cultural heritage and landscape objectives are therefore expected.

6.5 Policy H4: Windfall Sites

SEA1	SEA2	SEA3	SEA4
Biodiversity	Cultural Heritage	Landscape	Natural Resources
0	+	+	0

6.5.1 This policy is aimed at ensuring that the development of windfall sites is in line with policies set out in the NDP. It is likely that this policy will ensure that windfall developments are sensitive to the landscape character of the village. This is also anticipated to result in positive effects for the setting of features of cultural heritage importance in the village. Minor positive effects on the cultural heritage and landscape objectives are therefore expected.

6.6 Policy H5: Scale of Developments

SEA1	SEA2	SEA3	SEA4
Biodiversity	Cultural Heritage	Landscape	Natural Resources
0	+	+	0

This policy is aimed at limiting the number of developments within windfall sites to 6 dwellings per development (the cluster of 8 affordable dwellings at RM2 will be an exception). The result of this will be to retain the characteristics of the village. It is likely that this policy will have a positive effect on the landscape and cultural heritage objectives in terms of visual and setting effects.

6.7 Policy H6: Control of Future Development

SEA1	SEA2	SEA3	SEA4
Biodiversity	Cultural Heritage	Landscape	Natural Resources
+	+	+	+

6.7.1 This policy is aimed at preventing development outside the development boundary other than that set out in the NDP. This policy is designed to prevent incursions into the open countryside. It will also ensure that there is no additional loss of land considered to be of ecological, landscape or agricultural value. The settings of features of cultural heritage importance will also benefit from the implementation of this policy. It is likely that this policy will have a positive effect on the landscape, biodiversity, cultural heritage and natural resources objectives in terms of visual and ecological effects.

6.8 Policy H7: Village Design Statement

0	+	+	0
Biodiversity	Cultural Heritage	Landscape	Natural Resources
SEA1	SEA2	SEA3	SEA4

6.8.1 This policy requires that all development, without exception, demonstrates regard to the Eckington Village Design Statement (Annex I of the NDP). This will ensure that all building works undertaken are in keeping with the character of the village and are sympathetic to its built and historic environment. This will result in positive effects for the cultural heritage and landscape objectives.

6.9 Policy H8: Off-Street Parking

SEA1	SEA2	SEA3	SEA4
Biodiversity	Cultural Heritage	Landscape	Natural Resources
0	0	0	0

6.9.1 This policy requires that all development limits the possibility of on-street parking by designing any new development with parking spaces. This policy is likely to have a negligible effect on the SEA objectives.

6.10 Policy H9: Protecting Existing Off-Street Parking

SEA1	SEA2	SEA3	SEA4
Biodiversity	Cultural Heritage	Landscape	Natural Resources
0	0	0	0

6.10.1 This policy aims to reduce the levels of on-street parking. This policy is likely to have a negligible effect on the SEA objectives.

6.11 Policy H10: Sites Allocated for Development

SEA1	SEA2	SEA3	SEA4
Biodiversity	Cultural Heritage	Landscape	Natural Resources
+	+	+	+

6.11.1 Policy H13 states that, with reference to sites allocated for development (Policies H11 and H12 discussed below), applications will be supported provided that proposals are in accordance with the Eckington Village Design Statement and all policies contained within the NDP. This policy is likely to ensure that development is in keeping with the local character of the village and does not intrude into areas of ecologically and agriculturally sensitivity. As such it is anticipated that this policy will have a positive

6.12 Policy H11: Development Conditions - Roman Meadow 2 / Pershore Road

effect on all SEA objectives.

SEA1	SEA2	SEA3	SEA4
Biodiversity	Cultural Heritage	Landscape	Natural Resources
-	-	-	

6.12.1 Policy H11 sets out the development conditions for the site known as Roman Meadow 2 / Pershore Road. An assessment of these sites pre mitigation has been provided in the Reasonable Alternatives report³⁶ (Appendix A) and in Section 4. A summary is provided here for reference.

³⁶ Lepus Consulting (2018). Assessment of Reasonable Alternatives.

6.12.2

Allocations in Policy H11 are located in close proximity to a number of sites designated for their nature conservation importance (Eckington Railway Cutting SSSI and River Avon LWS and SWS). Whilst there will be no direct loss of habitat from these designated sites impacts may be associated with increased air pollution from car movements and increased recreational pressure from development. Both sites are located within a SSSI IRZ which states that development of 50 or more properties may have a significant impact. The allocation under Policy H11 proposes a total of 38 new dwellings (with 17 dwellings at Roman Road and 21 dwellings at Pershore Road), which is below the 50 dwelling threshold. As such the effect of Policy H11 on these designated sites is considered to be negligible. The sites currently comprise agricultural fields, which is considered to be of low ecological value. The area of land to be lost to development is small. The allocations will therefore result in a minor loss of green space and associated habitat. It is therefore considered that there will be a minor negative effect on the biodiversity objective pre mitigation.

6.12.3

The allocated sites are located in close proximity to a number of Grade II Listed Buildings and Eckington Village Conservation Area. There will be no direct loss to any archaeological features. However, it is considered likely that development at this location would permanently alter the setting of these heritage assets. In addition there is the potential for below ground features of archaeological interest to be disturbed during construction at these sites. A minor negative effect on the cultural heritage objective pre mitigation is therefore predicted.

6.12.4

Development proposed under H11 could potentially result in urban sprawl into the surrounding open countryside to some extent. Development proposed under Policy H11 would be likely to permanently alter the views for people using the local PRoW network and for residents of Russell Drive and Drakesbridge Road. Therefore, development at this location could potentially have a minor negative effect on the landscape objective pre mitigation.

6.12.5

Sites allocated under Policy H11 are located on ALC Grades 2 soil which is considered to be some of the BMV soils in the Parish. All development on greenfield land would result in the permanent and irreversible loss of ecologically and agriculturally valuable soils. As the sites proposed only cover a small area of land, it is considered likely that development at this location would result in a minor negative effect on the local soils. The sites coincide with Flood Zone 1 so development at these locations would be unlikely to place new residents in locations at risk of flooding and the effect is considered to be negligible. The Pershore Road allocation is located within an area of medium and high-risk surface water flooding. Due to its location, development at this site has the potential to permanently exacerbate surface water flooding and therefore a major negative effect on the natural resources objective cannot be ruled out.

6.13 Policy H12: Development Conditions – Jarvis Street

SEA1	SEA2	SEA3	SEA4
Biodiversity	Cultural Heritage	Landscape	Natural Resources
-	-	-	

6.13.1 Policy H12 sets out the development conditions for the site known as Jarvis Street. An assessment of this site has been provided in the Reasonable Alternatives report³⁷ (**Appendix A**). A summary is provided here for reference.

³⁷ Lepus Consulting (2018). Assessment of Reasonable Alternatives.

6.13.2

The allocation in Policy H12 is located in close proximity to a number of sites designated for their nature conservation importance (Eckington Railway Cutting SSSI and River Avon LWS and SWS). Whilst there will be no direct loss of habitat from these designated sites impacts may be associated with increased air pollution from car movements and increased recreational pressure from development. The Jarvis Street site is located within a SSSI IRZ which states that development of 50 or more properties may have a significant impact. The allocation under Policy H12 proposes a total of 6 new dwellings, which is below the 50 dwelling threshold. As such the effect of Policy H12 on these designated sites is considered to be negligible. The site currently comprises agricultural fields, which is considered to be of low ecological value. The area of land to be lost to development is small. The allocation will therefore result in a small loss of green space and associated habitat. It is therefore considered that there will be a minor negative effect on the biodiversity objective pre migration.

6.13.3

The allocated site is located in close proximity to a number of Grade II Listed Buildings and Eckington Village Conservation Area. Whilst there will be no directly loss of these cultural heritage features, it is considered likely that development at this location would alter the setting of these heritage assets. In addition there is the potential for below ground features of archaeological interest to be disturbed during construction at these sites. A minor negative effect on the cultural heritage objective pre mitigation is therefore predicted.

6.13.4

Due to its location, development proposed under H12 may be visible from the Cotswold AONB. It is uncertain the degree to which the development would alter the local character of the area and also impact upon views to and from key viewpoints (such as PRoWs, the AONB and existing residential properties). Therefore, development at this location is concluded to have a permanent minor negative impact on the landscape objective.

6.13.5

The Jarvis Street allocation is located on ALC Grades 2 soil which is considered to be some of the BMV soils in the Parish. All development on greenfield land would result in the permanent and irreversible loss of ecologically and agriculturally valuable soils. As the site proposed only covers a small area of land, it is considered likely that development at this location would result in a minor negative impact on the local soils. The site coincides with Flood Zone 1 so development at this location would be unlikely to place new residents in locations at risk of flooding. The site is located within an area of medium and high-risk surface water flooding. Due to its location, development at this site has the potential to permanently exacerbate surface water flooding and therefore a major negative effect on the natural resources objective cannot be ruled out.

6.14 Policy C1: New Community Facilities

SEA1	SEA2	SEA3	SEA4
Biodiversity	Cultural Heritage	Landscape	Natural Resources
+	+	+	+

6.14.1 Policy C1 aims to provide locations for new community facilitates which would enhance road safely and provide additional green space for village use. The protection of these green spaces within Eckington will safeguard ecologically and agriculturally sensitive land. It will also preserve the local landscape character and protect the setting of features of cultural heritage importance. It will therefore have a positive effect on the biodiversity, cultural heritage, landscape and natural resources objectives.

6.15 Policy C2: Community Facilities - Pershore Road

Biodiversity	Cultural Heritage	Landscape	Natural Resources
SEA1	SEA2	SEA3	SEA4

6.15.1 Policy C2 aims to protect and link green spaces around the Pershore Road site. The protection of these green spaces within Eckington will safeguard ecologically and agriculturally sensitive land. It will also preserve the local landscape character and protect the setting of features of cultural heritage importance. It will therefore have a positive effect on the biodiversity, cultural heritage, landscape and natural resources objectives.

6.16 Policy C3: Community Facilities - Jarvis Street / School Lane Area

SEA1	SEA2	SEA3	SEA4
Biodiversity	Cultural Heritage	Landscape	Natural Resources
+	+	+	+

6.16.1 Policy C3 aims to protect and link green spaces around the Jarvis Street / School Lane area. The protection of these green spaces within Eckington will safeguard ecologically and agriculturally sensitive land. It will also preserve the local landscape character and protect the setting of features of cultural heritage importance. It will therefore have a positive effect on the biodiversity, cultural heritage, landscape and natural resources objectives.

6.17 Policy C4: Village Hall

SEA1	SEA2	SEA3	SEA4
Biodiversity	Cultural Heritage	Landscape	Natural Resources
0	0	0	0

6.17.1 Policy C4 aims to protect the village hall site for community use unless enhanced provision is created elsewhere in the community. It is likely that Policy C4 will have a negligible effect on the SEA objectives.

6.18 Policy EN1: Key Landscapes

SEA1	SEA2	SEA3	SEA4
Biodiversity	Cultural Heritage	Landscape	Natural Resources
0	+	+	0

6.18.1

Policy EN3 does not rule out any form of development, but requires that its location, scale and design have given full consideration to the nature of a number of defined Key Landscapes. These have been informed by a 'Placecheck Survey Report' and are contained within the Eckington Village Design Statement (Annex I of the NDP) and the Eckington Conservation Area Appraisal and Management Plan 2010³⁸. In addition it requires that development will not obstruct or punctuate Key Landscapes in a way that would undermine the contribution they make to defining the character of the Parish of Eckington. This policy relates to SWDP Policy 25 (Landscape Character) by identifying at a local level key landscape attributes that form an essential part of the character of the Parish. This will have positive effects on the local landscape character and the setting of features of historical importance. It is likely that Policy EN3 will have a positive effect on the landscape and cultural heritage objectives.

6.19 Summary of policies assessments scores pre mitigation

6.19.1

The SA scoring matrices for all policies assessed in this report pre mitigation have been brought together in **Table 6.1.** It is apparent from these scores that the policies proposed in the NDP will be likely to help ensure future development in the parish negligibly or positively impacts most SEA topics. Policies H11 and H12 allocate sites for housing development and are therefore expected to result in negative impacts against the SEA objectives when considered in the absence of mitigation measures. The implementation of mitigation measures is considered in **Chapters 7 to 10**.

³⁸ Wychavon District Council. Eckington Conservation Area Appraisal and Management Plan (2010). Available at:

https://www.wychavon.gov.uk/documents/10586/157693/Eckington%20CA%20Appraisal%20%20%20%20%20Oct%202010%20final%20version.pdf [Date Accessed: 31.10.18].

Table 6.1: SEA scoring matrices for policies proposed in the NDP pre mitigation

	SEA1	SEA2	SEA3	SEA4
	Biodiversity	Cultural Heritage	Landscape	Natural Resources
H1	0	0	0	0
H2	0	0	0	0
Н3	0	+	+	0
H4	0	+	+	0
Н5	0	+	+	0
Н6	+	+	+	+
H7	0	+	+	0
Н8	0	0	0	0
Н9	0	0	0	0
H10	+	+	+	+
H11	-	-	-	
H12	-	-	-	
C1	+	+	+	+
C2	+	+	+	+
С3	+	+	+	+
C4	0	0	0	0
EN1	0	+	+	0

- 6.19.2 The following chapter will discuss the mitigation and residual effects of the proposals in the plan.
- 6.19.3 The mitigation hierarchy is a sequential process that operates in the following way: firstly, if possible, adverse effects should be avoided. Failing this, the nature of the effect should be reduced, if possible, so that it is no longer significant. If neither avoidance nor reduction is feasible, mitigation measures should be considered. Mitigation prescriptions might include changes to policy wording, advocating design guides, offsetting biodiversity effects or provision of new supporting Green Infrastructure (GI).

7 Biodiversity

7.1 Baseline Information

- 7.1.1 SACs are sites of the Natura 2000 network protected under EU Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora³⁹ (the Habitats Directive). Special Protection Areas (SPAs) are also sites of the Natura 2000 network, protected under Directive 2009/147/EC of the European Parliament and of the Council on the Conservation of Wild Birds⁴⁰ (the Birds Directive). Sites classified as a SPA or designated as a SAC are protected for the habitats and species they support.
- 7.1.2 Bredon Hill SAC is designated for its lowland calcareous grassland and invertebrate assemblage⁴¹ (see **Figure 7.1**). All but one of the 17 SSSI units are in a favourable condition. The site is classed as being under a high-risk threat, primarily towards the violet click beetle (*Limoniscus violaceus*) which is vulnerable to disease, air pollution and climate change⁴².

 $^{^{39}}$ European Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora . Available online at: http://eur-lex.europa.eu/legal-

content/EN/TXT/PDF/?uri=CELEX:31992L0043&from=EN 7 [Date Accessed: 07/09/18]

⁴⁰ European Directive 2009/147/EC on the conservation of wild birds . Available online at: http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32009L0147&from=EN [Date Accessed: 07/09/18]

⁴¹ Natural England (1994) Designated Sites View Bredon Hill. Available at: https://designatedsites.naturalengland.org.uk/SiteDetail.aspx?SiteCode=s1001495 [Date Accessed: 07/09/18]

⁴² Natural England (2015) Site Improvement Plan Bredon Hill. Available at: publications.naturalengland.org.uk/file/5656925612015616 [Date Accessed: 07/09/18]

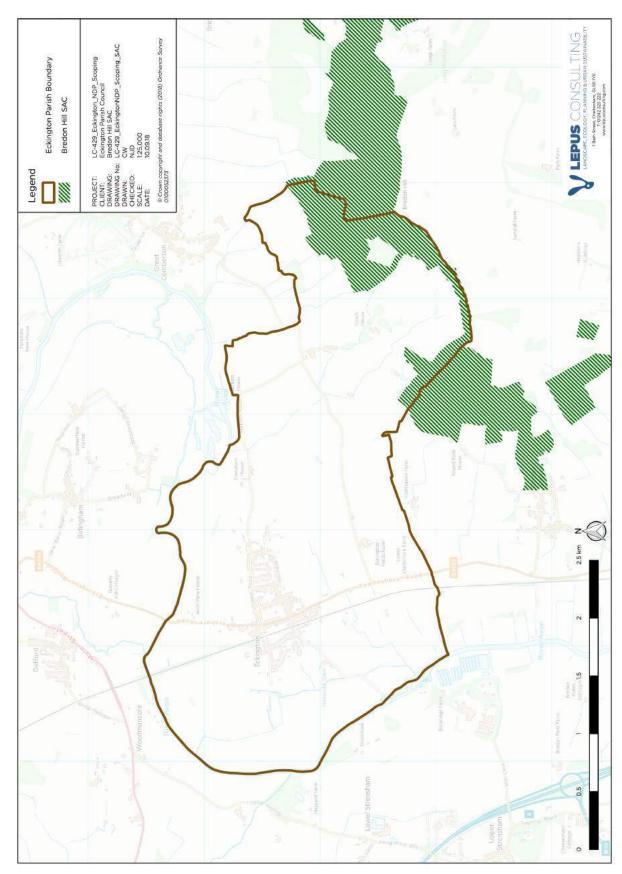


Figure 7.1: Bredon Hill SAC in relation to Eckington Parish.

- 7.1.3 Natural England designates SSSIs in England under the Wildlife and Countryside Act 1981 (as amended). Along with Bredon Hill SSSI, Eckington Railway Cutting SSSI is located to the north of Eckington Village and has been designated for its earth heritage. This site is currently in favourable condition, however, there are fears that the site will decline in coming years without effective management.
- 7.1.4 Natural England has developed IRZs for each SSSI unit in the country. IRZs are a tool for rapid initial assessment of the potential risks to SSSIs posed by development proposals⁴³. As can be seen from **Figure 7.2**, the majority of Eckington Village falls within the IRZ for Eckington Railway Cutting SSSI. Any residential development of 50 housing units or more could potentially result in negative impacts on the SSSI.
- 7.1.5 National Nature Reserves (NNRs) were established to protect some of the most important habitats, species and geology in the country and to provide 'outdoor laboratories' for research. Two thirds of the country's NNRs are managed by Natural England, the remainder being managed by organisations approved by Natural England, such as the RSPB, the Forestry Commission, Wildlife Trusts and local authorities. There is one NNR partially within Eckington, Bredon Hill NNR.
- 7.1.6 Ancient Woodland is an area that has been wooded continuously since at least 1600AD and includes 'ancient semi-natural woodland' and 'plantations on ancient woodland sites', both of which have equal protection under the NPPF. There is one stand of ancient woodland located to the east of Eckington Parish.

⁴³ Natural England (2018) Natural England's Impact Risk Zones for Sites of Special Scientific Interest. Available online at:

http://magic.defra.gov.uk/Metadata_for_magic/SSSI%20IRZ%20User%20Guidance%20MAGIC.pdf [Date Accessed: 10/09/18]

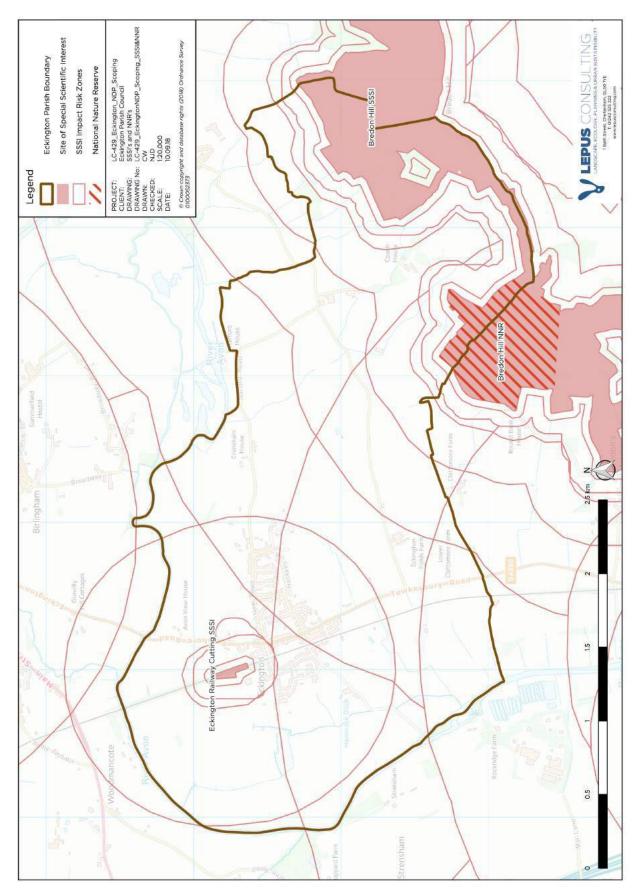


Figure 7.2: NNRs and SSSIs (and corresponding SSSI Impact Risk Zones) in and around Eckington Parish.

- 7.1.7 Local Wildlife Sites (LWSs) are non-statutory designated sites, identified by local authorities in partnership with nature conservation charities, statutory agencies and ecologists, although they are privately owned. Bredon Hill LWS is located to the south east of the Parish and the River Avon LWS follows the Parish boundary to the north and west.
- 7.1.8 Biodiversity Delivery Areas (BDAs) were developed by the Worcestershire Biodiversity Partnership in 2011, updated in 2016, to focus the delivery of the county's Biodiversity Action Plans (BAP)^{44.} They have been selected as areas with the greatest potential for delivery of the set Biodiversity Action Plan (BAP) targets for species and habitats. The Severn and Avon Vales BDA follows the River Avon and coincides with the north west of Eckington Parish (see **Figure 7.3**).
- 7.1.9 The National Biodiversity Network (NBN) Atlas⁴⁵ has revealed numerous protected and notable species have been recorded within Eckington Parish, some of which include:
 - Common pipistrelle (Pipistrellus pipistrellus);
 - Violet Click Beetle (Limoniscus violaceus);
 - Yellowhammer (Emberiza citronella);
 - Lapwing (Vanellus vanellus); and
 - Skylark (Alauda arvensis).

⁴⁴ Worcestershire County Council (2016) Biodiversity Action Plan. Available at: http://www.worcestershire.gov.uk/info/20252/environmental_policy/1155/biodiversity_action_plan/2 [Date Accessed: 10/09/18]

⁴⁵ NBN Atlas (2017) Explore your area. Available at: https://records.nbnatlas.org/explore/your-area#52.072|-2.115999999999854|12|ALL_SPECIES [Date Accessed: 10/09/18]

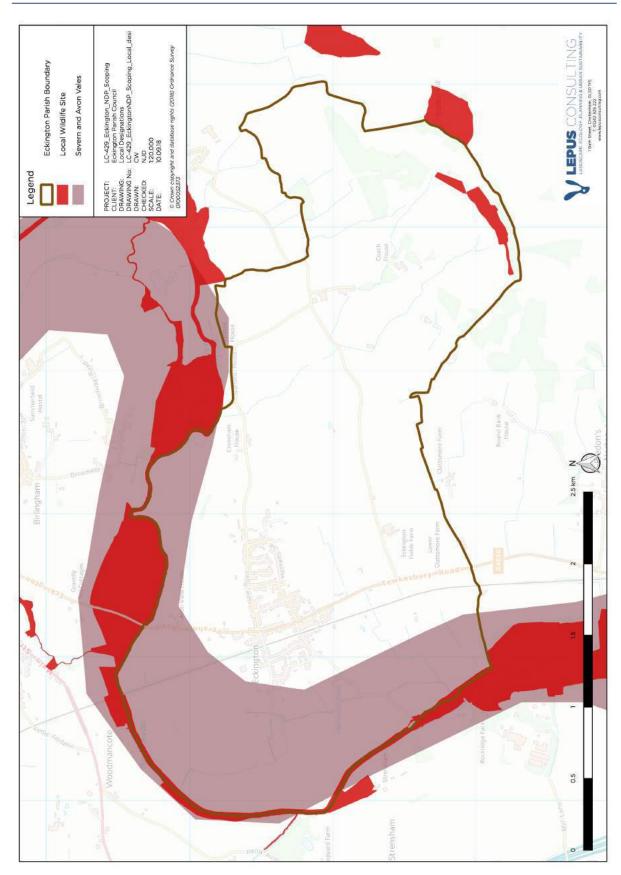


Figure 7.3: LWSs in and around Eckington Parish and the Severn and Avon Vales Biodiversity Delivery Area

7.2 Identified adverse effects pre mitigation

7.2.1 As outline above in **Chapter 6** each site allocated for development in the NDP (under Policies H11 and H12) is anticipated to result in an impact on biodiversity. This is as a result of the permanent, irreversible and long term loss of green space and associated habitat. However, given the agricultural nature of the area, the ecological potential of habitat to be lost is likely to be of low sensitivity. The effect on biodiversity of Policies H11 and H12 is therefore considered to be of minor negative significance.

7.2.2 Policies H6 and H10 aim to prevent the incursion of development into the countryside and ensure that all site development is undertaken in compliance with policies set out within the NDP. The community facilities policies (Policies C1, C2 and C3) aim to retain and provide new community facilities which include green spaces. These policies will reduce the fragmentation of habitats and prevent an increase in barriers to the movement of species. It is therefore considered that these policies will have a positive long term impact on biodiversity.

7.2.3 The impact of all other polices in the NDP are considered to have a negligible impact on biodiversity within and surrounding Eckington.

7.3 Cumulative effects pre mitigation

7.3.1 The cumulative scale of the development proposed in the NDP will be no more than 44 homes in total. This is below the SSSI IRZ threshold of 50 dwellings beyond which significant effects are anticipated. The cumulative loss of green space and associated habitat will be small and therefore of a low magnitude. Given the agricultural nature of the area, the ecological potential of habitat to be lost is considered to be of low sensitivity.

7.3.2 When the policies set out in the NDP are considered cumulatively it is anticipated that, due to the small scale loss of low quality ecologically sensitive land, the effect on biodiversity will be of minor negative significance.

7.4 Summary of pre mitigation effects

- 7.4.1 In summary effects are likely to include:
 - Minor negative effect associated with the permanent loss of green space and associated habitat at sites allocated for development.

 Minor positive effects associated with the protection of green space and prevention of incursion of development into the countryside through implementation of community and housing policies.

7.5 Recommendations for Mitigation and Enhancement

- 7.5.1 Biodiversity within the Eckington area relies on habitat connectivity throughout the wider region, therefore special consideration should be given to this within planning and design. Retention of the Green Infrastructure (GI) network within developments should be designed with the goal of maintaining and improving the habitat connectivity of the wider region.
- 7.5.2 Total or partial loss of, and harm to, existing linear features such as woodland, hedgerows, tree lines and aquatic networks should be avoided.
- 7.5.3 The NDP does not include policies to specifically protect and enhance the biodiversity of the area. However, Policy 22 of the SWDP⁴⁶ will apply to development within Eckington in this respect. This policy aims to protect designated sites and habitats and species of principal importance^{47.} It also requires that development takes opportunities to enhance biodiversity corridors and networks beyond their site boundaries.
- 7.5.4 The NDP could be strengthened through the inclusion of a specific policy relating to biodiversity protection and enhancement.

7.6 Residual effects

- 7.6.1 Whilst the NDP does not contain specific policies to protect and enhance features of biodiversity importance in the study area it is considered that policies set out in the SWDP will ensure that these sensitive receptors are protected and opportunities for enhancement are sought.
- 7.6.2 It is therefore concluded that following implementation of mitigation and enhancement measures set out in the SWDP, the NDP will have a negligible effect on biodiversity.

⁴⁶ South Worcestershire Development Plan (2016). http://www.swdevelopmentplan.org/wp-content/uploads/2016/06/The-Adopted-SWDP-February-2016.pdf [Date Accessed: 23.10.18]. ⁴⁷ Species of Principal Importance as listed under Section 41 of the Natural Environment and Rural Communities Act 2006.

8 Cultural Heritage

8.1 Baseline Information

- 8.1.1 Eckington has an array of distinctive heritage assets and historic areas recognised through designations. These include:
 - Nationally designated Listed Buildings;
 - Scheduled Monuments; and
 - Eckington Conservation Area.
- 8.1.2 Listed Buildings are those that have been placed on the Statutory List of Buildings of Special Architectural or Historic Interest. There are 50 Grade II and three Grade II* Listed Buildings within Eckington Parish. The majority of these are located within Eckington Village, with five located further east (see Figure 7.1).
- 8.1.3 A Scheduled Monument (SM) is a nationally important archaeological site or historic feature that is given protection under the Ancient Monuments and Archaeological Areas Act 1979.
- 8.1.4 There are three SMs within the Parish boundary (see **Figure 8.1**):
 - Eckington Bridge;
 - Ditched enclosures SE of Eckington Field Farm; and
 - Ditched enclosures ½ mile (800m) N of Woollshall Farm
- 8.1.5 Kamerton Camp is adjacent to the Parish boundary to the east.
- 8.1.6 The Register of Parks and Gardens (RPGs) of Special Historic Interest was first published by English Heritage in 1988. Although inclusion on the Register brings no additional statutory controls, registration is a material consideration in planning terms.

8.1.7

Although there are no RPGs within Eckington Parish, Overbury Court is a Grade II* Listed RPG, approximately 1.2km south east of the Parish boundary. The designated land includes the 16th century Georgia house, landscaped garden and pools, and covers approximately 2.5km of land. The Park extends south-west and north of the house and grounds. The southern half is primarily fields of permanent grassland with trees, as well as large areas of ridge and furrow and other earthworks. The north of the Park is primarily arable land. The main views of the Park from the house are south to Brake Pool and north to Bredon Hill.

8.1.8

Conservation Areas are areas of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance. Local authorities have the power to designate conservation areas in any area of 'special architectural or historic interest' whose character or appearance is worth protecting or enhancing. This is judged against local and regional criteria, rather than national importance as is the case with listing. Conservation Area designations increase the local planning authority's control over demolition of buildings and over certain alterations to residential properties that would normally be classed as 'permitted development' and not require planning permission. There is one Conservation Area in Eckington that covers a large proportion of the existing built form in the Parish (see **Figure 8.2**).

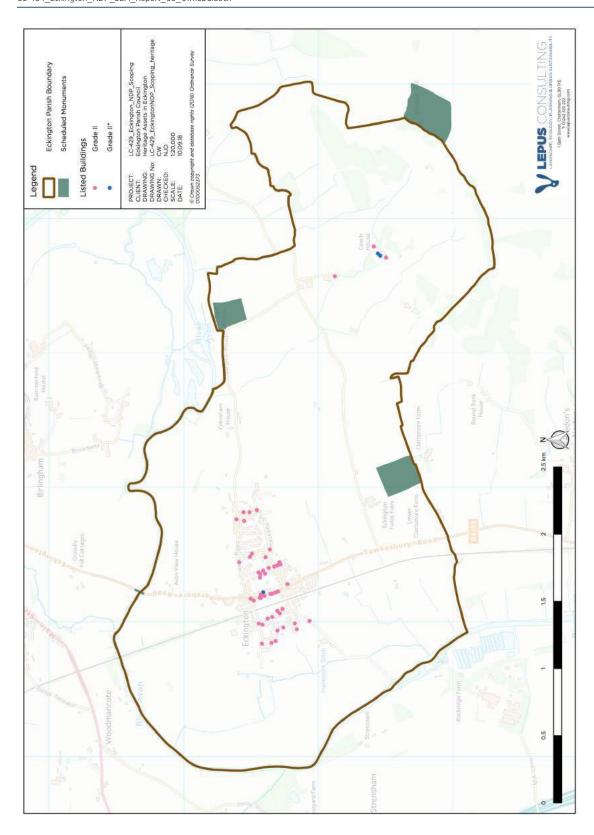


Figure 8.1: Heritage assets in Eckington Parish, including Listed Buildings and Scheduled Monuments.

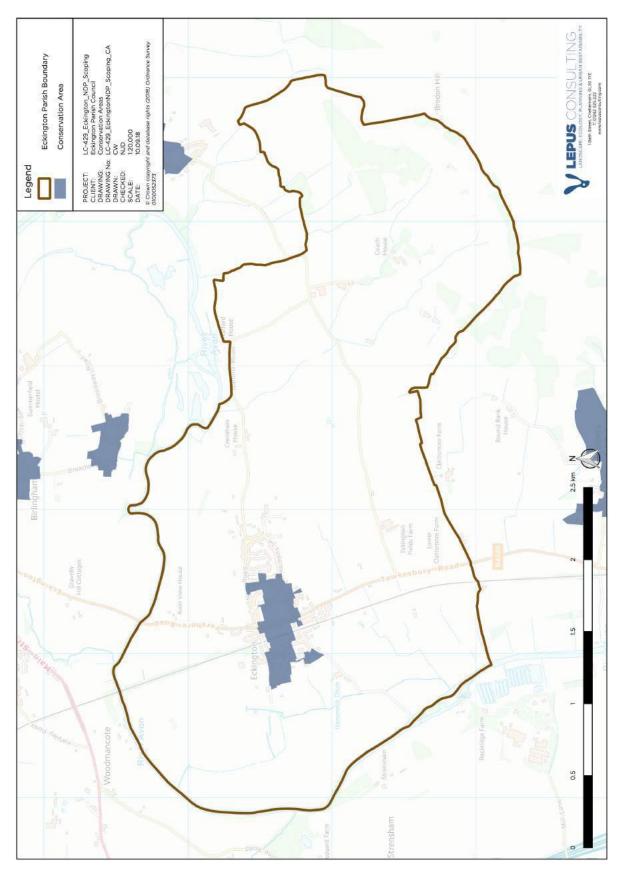


Figure 8.2: Conservation Areas in and around Eckington Parish.

8.2.3

8.2.4

8.2.5

8.2 Effects pre mitigation

8.2.1 Each of the sites allocated for development in the NDP (under Policies H11 and H12) are located close to features of cultural heritage importance including Listed Buildings and Eckington Conservation Area. These features are considered to be of high sensitivity. The NDP will not result in a direct loss of these features. It is however likely that there will be long term negative effects on the setting of these features as a result of development proposed within the allocations. In addition unknown below ground archaeological features have the potential to be disturbed during the development of these allocated sites. This would result in irreversible

negative effects on unknown features of cultural heritage importance.

8.2.2 Policies H3, H4, H5, H6, H7 and H10 aim to prevent the incursion of development into the countryside and ensure that all site development is undertaken in a manner that is sensitive to the character of the local environment. These policies make reference to Eckington Village Design Statement which aims to ensure that building works are undertaken in keeping with the character of the village and are sympathetic to its built and historic environment. These polices are therefore anticipated to have positive long term effects on the setting of features of cultural heritage importance.

The community facilities policies (Policies C1, C2 and C3) aim to retain and provide new community facilities which include green spaces. These policies will therefore retain the existing character of these areas and prevent changes in setting or disturbance to below ground features of archaeological importance. This will have an overall long term positive impact on cultural heritage assets.

The environment policy (EN1) set out within the NDP aims to protect the key landscapes and vistas. It notes that proposals that would have a significant detrimental impact on a key landscape by way of their scale, massing, height, use of materials or lighting will not be supported. It also notes that all development must conserve and not harm Key Landscapes. This policy will therefore have a positive effect on features of cultural heritage importance in terms of their setting.

The impact of all other polices in the NDP are considered to have a negligible effect on cultural heritage within and surrounding Eckington.

8.3 Cumulative effects pre mitigation

8.3.1 The cumulative scale of the development proposed in the NDP will be no more than 44 homes in total. This has the potential to have a minor negative effect on the setting of features of cultural heritage importance and disturbance to unknown below ground features of archaeological interest. A number of Policies within the NDP aim to prevent the incursion of development into the countryside and ensure that all site development is undertaken in a manner that is sensitive to the character of the local environment. The NDP will ensure the implementation of Eckington Village Design Statement and therefore also ensure that development is sympathetic to its built and historic environment. When taken cumulatively the policies proposed in the NDP are anticipated to have a negligible effect on features of cultural heritage importance within Eckington.

8.4 Summary of pre mitigation effects

8.4.1 In summary effects are likely to include

- Minor negative effect associated with a change to the setting of features of cultural heritage importance associated with the proposed allocations.
- Minor negative effect associated with the disturbance of unknown below ground features of archaeological importance associated with the proposed allocations.
- Minor positive effects associated with the protection of green space and protection of the built and historic environment of Eckington through implementation of community, housing and environment policies.

8.5 Recommendations for Mitigation and Enhancement

8.5.1 Loss of archaeological features is an irreversible adverse effect, therefore assessment and necessary excavation of features prior to development should be carefully documented and added to the local historic record where appropriate. Whilst the NDP does not include policies to specifically protect unknown features of archaeological importance, Policy 24 of the SWDP⁴⁸ will apply to development within Eckington in this respect. Where there is potential for heritage assets with archaeological interest to be affected, this policy requires an appropriate level of archaeological assessment to be undertaken.

- 8.5.2 Minor impacts of proposed development (at the allocated sites) on the setting of features of cultural heritage importance is anticipated. In addition to policies proposed in the NDP Policy 25 of the SWDP will apply to development in Eckington ensuring that development proposals and their associated landscaping schemes are sensitive to the local character of the village.
- 8.5.3 Where possible development should consider sensitive design around existing cultural assets and maintain the setting of such assets, including the use of screening. Screening should consist of naturally occurring tree and hedge species. Guidelines for species selection and conditions for screening foliage are provided by the Royal Horticultural Society^{49.}
- 8.5.4 It is also recommended that, where appropriate and where the opportunity exists, proposals should seek to enhance access to, and increase local awareness of, cultural heritage assets in the local area.

8.6 Residual Effects

8.6.1 Following the implementation of mitigation and enhancement through policies set out in the NDP and SWDP it can be concluded that the NDP will have a long term minor positive effect on features of cultural heritage importance by protecting and enhancing the setting of existing features through sensitive design and planning.

⁴⁸ South Worcestershire Development Plan (2016). http://www.swdevelopmentplan.org/wp-content/uploads/2016/06/The-Adopted-SWDP-February-2016.pdf [Date Accessed: 23.10.18]. ⁴⁹ Royal Horticultural Society (2017) Plants for Screening. Available at: https://www.rhs.org.uk/advice/profile?PID=636

9 Landscape

9.1 Baseline Information

9.1.1 Eckington Parish sits entirely within the Seven and Avon Vales National Character Area⁵⁰. Each NCA profile includes a detailed description of the natural and cultural features shaping the NCA and the key drivers for change. The profiles of each NCA also suggest Statements of Environmental Opportunities (SEOs) that offer guidance on the critical issues and which would help to achieve sustainable growth and a more secure environmental future.

9.1.2 The SEOs identified for the Severn and Avon Vales NCA include:

- **SEO 1:** Protect and manage the landscape, heritage and biodiversity associated with the Severn Estuary, the river valleys and other hydrological features, planning for a landscape scale expansion of wetlands, intertidal habitats and unimproved grasslands along river floodplains through, restoration, expansion and re-linkage of existing remnant areas of semi-natural habitat.
- SEO 2: Seek to safeguard and enhance this area's distinctive patterns
 of field boundaries, ancient hedgerows, settlements, orchards,
 parkland, small woodlands, chases, commons and floodplain
 management with their strong links to past land use and settlement
 history, and for the benefits this will bring to soil erosion, soil quality
 and biodiversity.
- **SEO 3:** Reinforce the existing landscape structure as part of any identified growth of urban areas, hard infrastructure and other settlements ensuring quality green infrastructure is incorporated enhancing health, access, recreation, landscape, biodiversity and geodiversity.
- **SEO 4:** Protect geological exposures and maintain, restore and expand semi natural habitats throughout the agricultural landscape, linking them together to create a coherent and resilient habitat network enabling ecosystems to adapt to climate change.

⁵⁰ Natural England (2014) National Character Areas. Available at: https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making [Date Accessed: 10/09/18]

9.1.3 Landscape character is defined as the distinct, recognisable and consistent pattern of elements in the landscape. It is these patterns that give each locality its 'sense of place', making one landscape different from another, rather than better or worse. In defining the combinations of components which make each landscape unique, landscape character is a way of thinking about landscape more holistically and objectively, rather than focusing on scenic beauty and subjective responses. Landscapes have evolved over time as a result of both natural and cultural processes.

9.1.4 Within Eckington there are four landscape types as identified in Worcestershire's Landscape Character Assessment (LCA)⁵¹ are shown in **Table 9.1 and Figure 9.1**.

Table 9.1: Landscape types and key primary characteristics.

Landscape Type	Primary Characteristics
Principle Village Farmlands	 Nucleated pattern of expanded rural villages. Arable/cropping land use - cereals and field vegetables on fertile, free-draining soils.
Principle Wooded Hills;	Varied, often steeply sloping, topography.Large, often interconnecting, blocks of ancient woodland.
Riverside Meadows	 Flat, low-lying topography. Pastoral land use, including seasonal grazing meadows. Tree cover character of individual trees rather than woodland. Tree cover pattern of linear tree belts along ditches, watercourses and in hedgerow.
Wooded Hills and Farmland	 Prominent sloping topography. Hedgerow field boundaries are an important element in defining landscape scale. Tree cover pattern of large, discrete woodland blocks.

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⁵¹ Worcestershire County Council (2011) Landscape Character Assessment: Supplementary Guidance. Available at: www.swdevelopmentplan.org/wp.../Landscape_Character_Assessment_Nov2011.pdf [Date Accessed: 07/09/18]

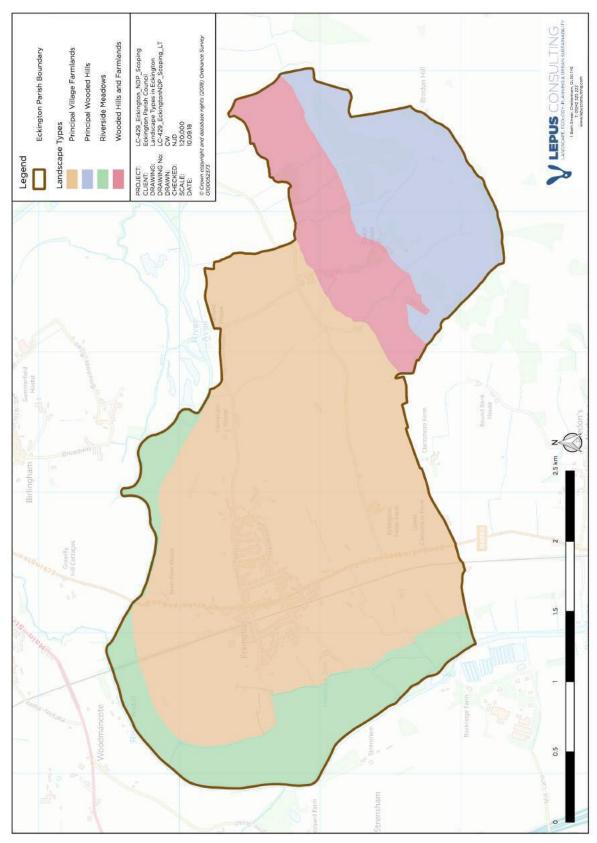


Figure 9.1: Landscape Types in Eckington Parish according to Worcestershire's LCA⁵².

⁵² Worcestershire County Council (2011) Landscape Character Assessment: Supplementary Guidance. Available at: www.swdevelopmentplan.org/wp.../Landscape_Character_Assessment_Nov2011.pdf [Date Accessed: 07/09/18]

9.1.5

Eckington Parish partially coincides with the Cotswolds AONB (see **Figure 9.2**). The Cotswolds AONB Management Plan 2018 – 2023, a statutory plan prepared by the Cotswolds Conservation Board, aims to protect the features of the AONB whilst supporting businesses and communities within and around it.

9.1.6

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

9.1.7

Eckington is a rural Parish characterised by open space and countryside, with nearly all the existing built form within the built-up boundary of the village of Eckington. Currently, long distance countryside views are appreciated and enjoyed by local residents, users of the local PRoW network and those seeking recreational enjoyment in and around the AONB.

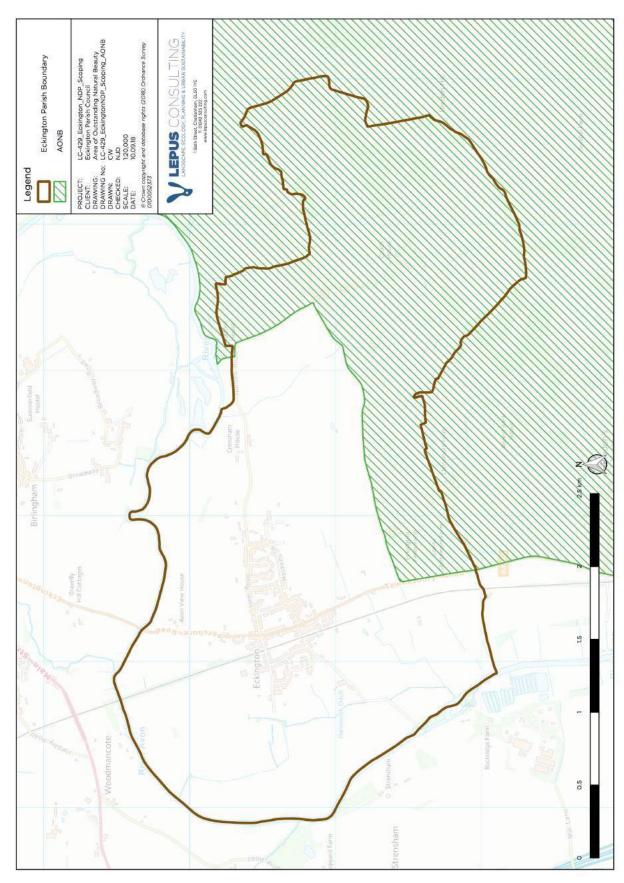


Figure 9.2: The Cotswolds AONB in relation to Eckington Parish.

9.2 Effects pre mitigation

9.2.1 The Jarvis Street allocation is potentially visible from the AONB. This receptor is considered to be of high sensitivity. All allocated sites are also visible by residents and users of the PRoW network in the area. The local rural character of the village is an important feature of Eckington. Each of the sites allocated for development in the NDP (under Policies H11 and H12) are anticipated to result in minor negative long term effects on features of landscape importance.

- 9.2.2 Policies H3, H4, H5, H6, H7 and H10 aim to prevent the incursion of development into the countryside and ensure that all site development is undertaken in a manner that is sensitive to the character of the local environment. These policies make reference to Eckington Village Design Statement which aims to ensure that building works are undertaken in keeping with the character of the village and are sympathetic to its built and historic environment. These polices are therefore anticipated to have a positive long term effect on the local landscape character.
- 9.2.3 The community facilities policies (Policies C1, C2 and C3) aim to retain and provide new community facilities which include green spaces. Retention of green space will safeguard the existing character of these areas having an overall long term positive effect on the local landscape character.
- 9.2.4 The environment policy (EN1) set out within the NDP aims to protect the landscape within the AONB, the local area and at key viewpoints. This policy will therefore have a positive effect on local landscape character.
- 9.2.5 The impact of all other polices in the NDP are considered to have a negligible effect on landscape receptors within and surrounding Eckington.

9.3 Cumulative effects pre mitigation

9.3.1 The cumulative scale of the development proposed in the NDP will be no more than 44 homes in total. A number of Policies within the NDP aim to prevent the incursion of development into the countryside and ensure that all site development is undertaken in a manner that is sensitive to the character of the local environment. In addition the environment policies aim to protect landscape effects on the AONB, the local area and key viewpoints. The NDP will ensure the implementation of Eckington Village Design Statement and therefore also ensure that development is sympathetic to the existing character of the village. When taken cumulatively the policies proposed in the NDP are anticipated to have a minor positive effect on the landscape within Eckington.

9.4 Summary of pre mitigation effects

9.4.1 In summary effects are likely to include

- Minor negative effect associated with change to the local character of the village and AONB associated with the proposed allocations.
- Minor positive effects associated with the protection of green space, promotion of development that is sensitive the existing character of the village, prevention of the incursion of development into the countryside and protection of the AONB and key viewpoints through implementation of policies.

9.5 Recommendations for Mitigation and Enhancement

9.5.1 As noted above policy EN1 aims to safeguard the local landscape character. This policy will ensure that development allocated in the NDP does not have an negative landscape impact. In addition, Policy 25 of the SWDP will apply to development in Eckington ensuring that development proposals and their associated landscaping schemes are sensitive to the local character of the village.

9.5.2 Where possible, development should incorporate mitigation through careful design including planting strategies. Retention and incorporation of principle landscape elements (identified within the Cotswolds AONB Management Plan⁵³) such as dry stone walls and hedges is likely to aid this.

⁵³ Cotswolds AONB Management Plan 2018-2023 (2018)

9.5.3

New developments should seek to incorporate new planting schemes or landscape buffers into the development design for screening purposes, in keeping with the local character. Screening buffers should comprise local indigenous species that will maintain their foliage throughout the year (e.g. species that do not lose foliage over the winter months). Where feasible, it is recommended that developers are encouraged to employ techniques that help integrate new developments into the surrounding landscape. Techniques could include earth mounding, ha-ha walls or sourcing local materials for construction. Retention and incorporation of GI is recommended in order to minimise the negative effects of development on the landscape character of the area.

9.5.4

In general, lower density housing developments are anticipated to have a reduced negative impact on the surrounding landscape character. This is required under Policy H3 of the NDP where the Eckington Village Design Statement has been taken into consideration in the development of housing densities.

9.6 Residual Impacts

9.6.1

Following the implementation of mitigation through policies set out in the NDP and Cotswold AONB Management Plan it can be concluded that the NDP will have a long term minor positive effect on the local landscape character through its protection and enhancement.

10 Natural Resources

10.1 Baseline Information

Soils

10.1.1 Soil is an essential and non-renewable resource that provides a wide range of ecosystem services. It filters air, stores and cycles water and nutrients, decomposes and cycles organic matter, supports plant growth and provides medicines. It is also one of the most important natural carbon sinks available and is vital in efforts to mitigate climate change.

10.1.2 It is therefore important for decision makers to make best efforts to preserve soil resources. Development such as that proposed in the NDP can potentially adversely impact on soil stocks, such as by direct loss of soil (e.g. excavating), contamination, increased erosion, breakdown of structure and loss of nutrients. In late modernity soils in the UK have rapidly degraded, predominantly due to intensive agricultural production and industrial pollution. The UK's soil continues to face three main threats⁵⁴:

- Soil erosion by wind and rain (it is estimated that the UK loses 2.2 million tonnes of topsoil every year due to wind and water erosion);
- Compaction; and
- Organic matter decline.
- 10.1.3 Construction on land has the potential to exacerbate compaction of soils and the decline in organic matter, whilst all three are expected to be exacerbated by climate change.
- 10.1.4 Soils in Eckington are varied (see **Table 10.1**). All of the areas support arable and grassland habitats. The carbon storage of all soils in the area is generally low, whilst the permeability (which impacts surface water runoff) varies between naturally wet, feely draining and impeded.

⁵⁴ Defra (2009) Safeguarding our Soils - A Strategy for England. Available at: https://www.gov.uk/government/publications/safeguarding-our-soils-a-strategy-for-england [Date Accessed: 11/09/18]

Table 10.1: Most prominent/common soils in Eckington⁵⁵.

Soil	Texture	Permeability	Fertility	Carbon storage	Landcover
Freely draining slightly acid loamy soils	Loamy	Freely draining	Low Low		Arable and grassland
Lime-rich loamy and clayey soils with impeded drainage	Clayey, some loamy	Slightly impeded drainage	High	Low	Arable, some grassland
Loamy and clayey floodplain soils with naturally high groundwater	Loamy and clayey	Naturally wet	Moderate	Medium	Grassland, some arable
Slightly acid loamy and clayey soils with impeded drainage	Loamy, some clayey	Slightly impeded drainage	Moderate to high	Low	Arable and grassland
Slowly permeable seasonally wet slightly acidic but base-rich loamy and clayey soils	Loamy and clayey	Impeded drainage	Moderate	Low	Grassland and arable, some woodland

10.1.5 Avoiding the loss of best and most versatile (BMV) land is a priority as mitigation is rarely possible. BMV is usually indicated by Agricultural Land Classification (ALC) Grade 1, with ALC Grade 5 the least valuable. The soils across Eckington are varied, with areas of ALC land Grade 1, 2, 3 and 4 (see Figure 10.1). There is approximately 35ha of Grade 1 ALC land and 215ha of Grade 2 soils within Eckington Parish. It is assumed the Grade 3 soils are Grade 3a, which are versatile and productive soils.

Water Resources

- 10.1.6 Seven Trent Water (STW) is responsible for the water supply, the foul drainage network and wastewater treatment within the Parish.
- 10.1.7 According to the EA, some water resources are under 'moderate stress' in the STW catchment area, with some areas under 'serious' stress. In this context there are current and predicted supply-demand deficits across the catchment area.

⁵⁵ Cranfield Soil and Agrifood Institute (2018) Soilscapes. Available at: http://www.landis.org.uk/soilscapes/ [Date Accessed: 10/09/18]

10.1.8

Catchment Abstraction Management Strategy (CAMS) are six-year strategies developed by the EA for managing water resources at the local level. CAMS will be produced for every river catchment area in England and Wales. Eckington is covered by the Avon Warwickshire CAMS.

Water Quality

10.1.9

The parish of Eckington is situated within a horseshoe bend of the River Avon. The Avon Warwickshire catchment extends from the source of the River Avon near Coventry to its confluence with the River Severn near Tewkesbury. This largely rural catchment has a high value for wildlife that is also important for anglers and water sports. There are 78 surface and ground water bodies in the catchment, one of which is an artificial lake, nine of which are heavily modified and 68 of which are natural⁵⁶. The EA provides data on the ecological and chemical quality of each surface waterbody (see **Table 10.2**).

Table 10.2: Ecological and chemical classification for surface waters in the Avon Warwickshire catchment for 2016.

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

10.1.10

The vulnerability of groundwater to pollution is determined by the physical, chemical and biological properties of the soil and rocks. There are no SPZs present in or around the Parish of Eckington and development here is therefore unlikely to pose a threat to the quality of groundwater sources (see **Table 3.5** for definitions of SPZs).

⁵⁶ Environment Agency (2016) Avon Warwickshire – Summary, Catchment Management. Available at: http://environment.data.gov.uk/catchment-planning/ManagementCatchment/3007/Summary [Date Accessed: 10/09/18]

Flooding

10.1.11

There are several types of flooding, including fluvial (river and coastal flooding) and pluvial (surface water flooding), as well as flooding from reservoirs. The EA provide data on flood risk in order to inform planning decisions (see **Table 3.5**). The north and western boundaries of Eckington Parish are within Flood Zones 2 and 3, following the River Avon (see **Figure 10.2**). The Flood Zone reaches the edge of Eckington Village. No buildings are currently within any of the Flood Zones.

10.1.12

Surface water flooding is different to fluvial flooding. It generally happens when rainwater does not drain away through the ground or normal drainage systems and instead lies on, or flows over, the ground. Flooding from surface water is difficult to predict as rainfall location and volume are difficult to forecast. In addition, local features can greatly affect the chance and severity of flooding. It often occurs due to the combination of intense periods of rainfall falling on impermeable surfaces such as concrete or hard and bare soils. Surface water flood risk is also divided into three categories by the EA (see **Section 3.3**). The Parish of Eckington has several areas of land at Low, Medium and High risk of surface water flooding, some of which occurs within Eckington Village (see **Figure 10.3**).

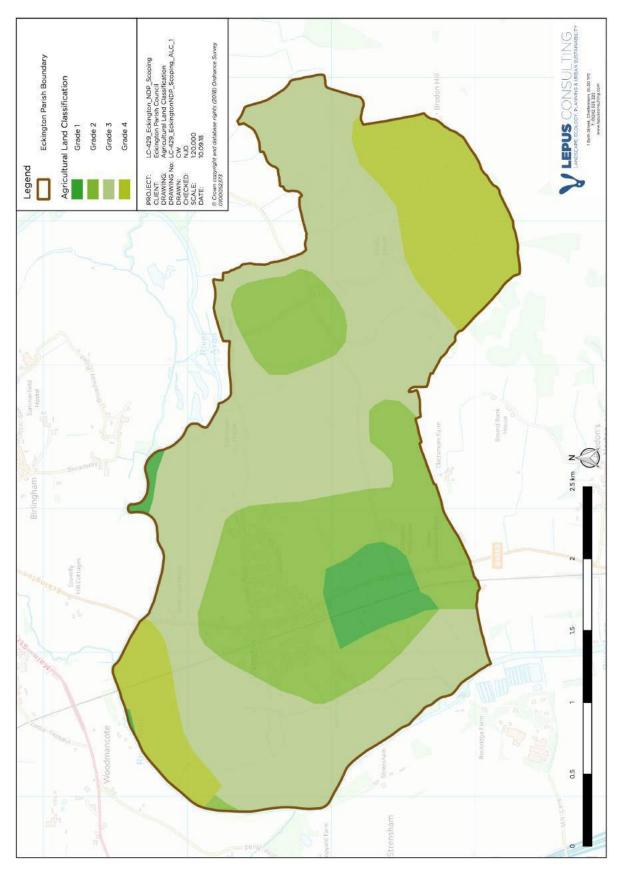


Figure 10.1: Agricultural Land Classification in Eckington Parish.

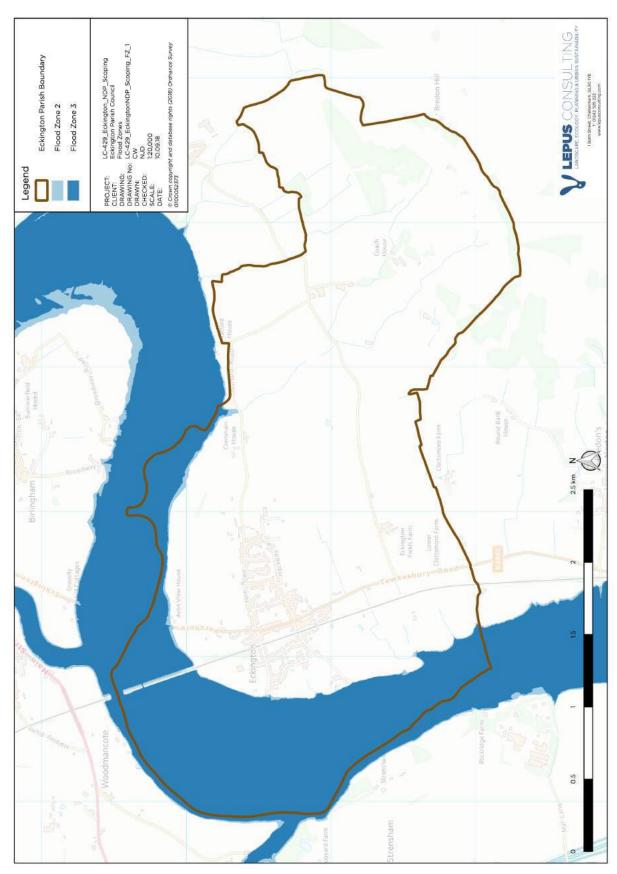


Figure 10.2: Fluvial Flood Zones in and around Eckington Parish.

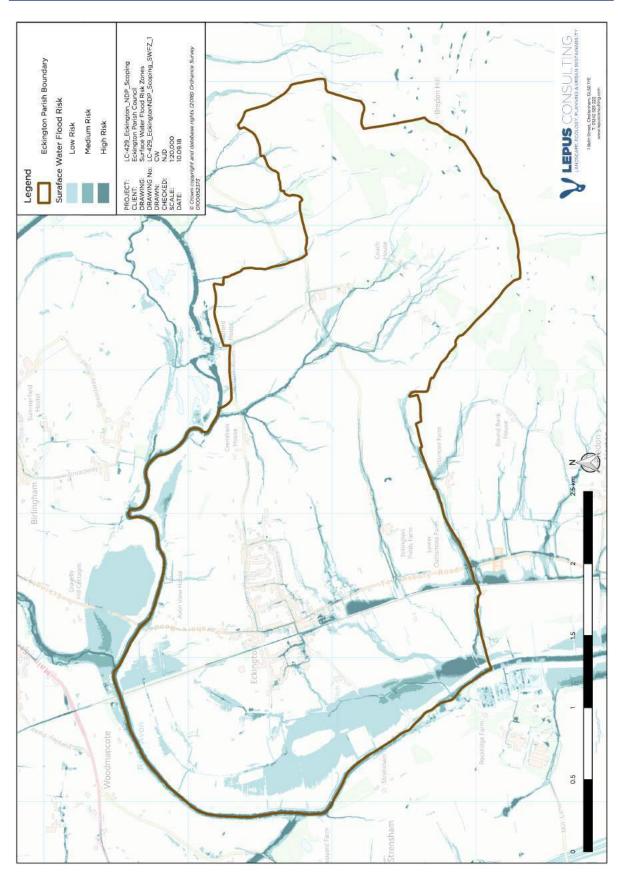


Figure 10.3: Surface water Flood Zones in and around Eckington Parish⁵⁷.

⁵⁷ Environment Agency Flood Map – Available at: https://environment.data.gov.uk/ds/rofsw/#/rofsw?grid=SP24

10.2 Effects pre mitigation

The proposed allocated site at Pershore Road and Jarvis Street (Policies H11 and H12) are located in areas of medium to high risk of surface water flooding. It is therefore considered that there will be a likely major negative effect on natural resources as a result of development in these areas as surface water flood risk will be exacerbated. The loss of a small area of the BMV soil in the Parish is considered to result in a likely minor negative effect on natural resources. All proposed allocations are located in areas classed as Flood Zone 1 (i.e. fluvial flood risk is very low) and therefore the proposed site allocations are not expected to result in a negative effect on flooding.

- 10.2.2 Policy H6 aims to prevent future development outside of the village boundary. This will minimise the loss of additional BMV soils and avoid increased development pressures on areas of floodplain.
- 10.2.3 Policies C1, C2 and C3 promote the retention of green spaces for community uses. This will result in a positive long term effect on natural resources in the local area by reducing loss of BMV soils and avoiding development pressures on areas of floodplain.
- 10.2.4 All other Policies set out in the NDP are considered likely to have negligible effects on natural resources.

10.3 Cumulative effects pre mitigation

10.3.1 When considered cumulatively it is anticipated that due to the location of two allocations within areas at high risk of surface water flooding it is considered that the NDP will have a major negative effect on natural resources.

10.4 Summary of pre mitigation effects

10.4.1 In summary effects are likely to include

- Major negative effect associated with increased risk of surface water flooding as a result of the proposed allocations.
- Minor positive effect associated with the retention and protection of green spaces for community use and subsequent protection of BMV soils as a result of the implementation of policies.

10.5 Recommendations for Mitigation and Enhancement

- 10.5.1 Wherever possible development should utilise previously developed land and existing buildings.
- 10.5.2 Where development is located in an area at high risk of surface water flooding, mitigation should involve implementing sustainable urban drainage systems (SuDS)⁵⁸ and/or GI features such as attenuation and balancing ponds⁵⁹. GI features can also slow surface water runoff and increase absorption of floodwater.
- 10.5.3 Policy 29 of the SWDP aims to minimise flood risk, improve water quality and ground water recharge. It notes that all development proposals (as appropriate to their nature and scale) will be required to:
 - Demonstrate through a Water Management Statement that site drainage and runoff will be managed in a sustainable and coordinated way that mimics the natural drainage network.
 - Manage surface water through SuDS. SuDS schemes must protect water quality and, wherever practicable, reduce the risk of diffuse pollution by means of treating at source and following the management train approach.
 - Secure the long-term maintenance of SuDS schemes.
 - As a minimum, demonstrate that for a Greenfield site, the postdevelopment surface water run-off rate will not increase. Proposals on brownfield land must show a 20% reduction in surface water run-off rates compared with the pre-development situation. A greater reduction in surface water run-off rates may be sought in areas identified, e.g. in a Worcestershire Surface Water Management Plan as having surface water flooding problems. In all cases, development proposals must not increase surface water flood risk beyond the site.
 - Prior to the submission of a planning application, consult with STW to ensure appropriate water infrastructure is secured (surface water sewer capacity).
 - Avoid culverting of any watercourses and secure adequate maintenance access. Open up any culverted watercourses unless this will clearly compromise public safety.
 - Demonstrate that the submitted landscaping scheme will preserve and wherever possible improve the ecological status of on-site watercourses and water bodies, including integration into the wider blue and green infrastructure.

⁵⁸ Construction Industry Research and Information Association (2007) Sustainable Urban Drainage System Manual

⁵⁹ Construction Industry Research and Information Association (2014) Using green infrastructure and nature to manage flood risk

- Demonstrate compliance with the Water Framework Directive, exploring opportunities to help meet its targets.
- The SWDP notes that lack of space, prohibitive costs, inadequate infiltration and land contamination will not be accepted as reasons for not including SuDS.
- 10.5.4 The NDP could be strengthened through the inclusion of a policy aimed specifically at the incorporation of measures to address surface water flooding issues in future development design.

10.6 Residual Impacts

10.6.1 Following the implementation of mitigation through policies set out in the SWDP it can be concluded that the NDP will have a negligible effect on natural resources.

11 Monitoring

11.1 Monitoring proposals

- 11.1.1 The SEA Directive states that 'member states shall monitor the significant environmental effects of the implementation of plans and programmes... in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action' (Article 10.1).
- 11.1.2 The Environmental Report should also provide information on a 'description of the measures envisaged concerning monitoring' (Annex I (i)). This represents Stage F of the process, according to the DCLG (2015) Guidance on SEA for Neighbourhood Plans.
- 11.1.3 The monitoring requirements typically associated with the SEA process are recognised as placing heavy demands on authorities with SEA responsibilities. For this reason, the proposed monitoring framework should focus on those aspects of the environment that are likely to be negatively impacted upon, where the impact is uncertain or where particular opportunities for improvement might arise.
- 11.1.4 The purpose of monitoring is to measure the environmental effects of a plan, as well as to measure success against the plan's objectives. It is therefore beneficial if the monitoring strategy builds on monitoring systems that are already in place. It should also be noted that monitoring could provide useful information for future plans and programmes.
- 11.1.5 Monitoring is particularly useful in answering the following questions:
 - Were the assessment's predictions of sustainability effects accurate?
 - Does the NDP contribute to the achievement of desired sustainability objectives?
 - Are mitigation measures performing as well as expected?
 - Are there any unforeseen adverse effects? Are these within acceptable limits, or is remedial action required?

11.1.6

The SEA guidance suggests that SEA monitoring and reporting activities can be integrated into the regular planning cycle. As part of the monitoring process, South Worcestershire will be required to prepare Annual Monitoring Reports. It is anticipated that elements of the SEA monitoring programme for the NDP could be incorporated into these processes. The monitoring targets will be informed by the SA Framework and its indicators (see **Appendix C**).

11.1.7

Whilst the SEA process has not identified any significant negative effects associated with the NDP it is considered that monitoring may be beneficial to ensure the successful implementation of recommended mitigation and enhancement measures. The areas specified for monitoring therefore include the following:

- Opportunities for biodiversity enhancement: The percentage of developments generating overall biodiversity enhancements;
- Protection of unknown below ground features of archaeological interest. The percentage of developments that give consideration to features of archaeological importance.
- Opportunities to enhance access to and local awareness of cultural heritage assets. The total annual number of visitors to local historic attractions.
- Sensitive design of development. Assessment of the use of locally sourced materials in local planning applications.
- Implementation of SuDS. The percentage of developments incorporating SuDS into their design.

11.1.8

Details of any monitoring programme are, at this stage, preliminary and may evolve over time based on the results of consultation and the identification of additional data sources (as in some cases information will be provided by outside bodies). The monitoring of individual schemes/proposals should also be addressed at project level.

12 Conclusions and Next Steps

12.1 Environmental Report

- 12.1.1 This document constitutes and Environmental Report for the purposes of the SEA Directive, in order to:
 - Provide an outline of the contents and main objectives of the NDP and its relationship with other relevant plans;
 - Consider the environmental protection objectives established at international, national or community level and how these objectives are relevant to the NDP;
 - Assess the likely significant effects on the environment caused by the NDP (including biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, and cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors);
 - Give details of the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the NDP;
 - Give an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information; and
 - Include a description of the measures envisaged concerning monitoring.
- 12.1.2 Appraisals of the NDP did not identify any likely significant negative residual effects on the environment. **Table 12.1** below provides a summary of anticipated likely effects of the NDP following the implementation of mitigation and enhancement measures.

Table 12.1: SEA scoring matrices for policies proposed in the NDP following mitigation and enhancement

	SEA1	SEA2	SEA3	SEA4
	Biodiversity	Cultural Heritage	Landscape	Natural Resources
H1	0	0	0	0
H2	0	0	0	0
Н3	0	+	+	0
H4	0	+	+	0
H5	0	+	+	0
Н6	+	+	+	+
H7	0	+	+	0
Н8	0	0	0	0
Н9	0	0	0	0
H10	+	+	+	+
H11	0	+	+	0
H12	0	+	+	0
C1	+	+	+	+
C2	+	+	+	+
C3	+	+	+	+
C4	0	0	0	0
EN1	0	+	+	0

12.2 Next Steps

12.2.1 This Environmental Report will be subject to consultation with the statutory bodies, the responses from which will be included in the appendices.

- The Pre Submission NDP will be submitted to the local planning authority, Wychavon District Council. Once the District Council is satisfied that the NDP complies with all statutory requirements, it will be published for consultation for a minimum of six weeks, in particular inviting representations from any consultation body referred to in the consultation statement. The Neighbourhood Plan will also be sent to an independent examiner who will test whether or not the plan meets the basic conditions⁶⁰.
- 12.2.3 Formal representations made through the consultation process will be submitted to the Examiner of Neighbourhood Plans alongside the draft NDP and this SEA Report. This represents Stage E of the SEA, according to the DCLG (2015) guidance. If the examiner of Neighbourhood Plans is satisfied that the basic conditions have been met, the NDP will be subject to local referendum. If over 50% of votes at the referendum are in favour of the NDP, the NDP will become adopted as part of the statutory development plan.
- 12.2.4 SEA Regulations 16.3c) (iii) and 16.4 require that a 'statement' be made available to accompany the plan, as soon as possible after the adoption of the plan or programme, known as a post-adoption statement. The purpose of the SEA statement is to outline how the SEA process has influenced and informed the NDP development process and demonstrate how consultation on the SEA has been taken into account.
- 12.2.5 As the regulations outline, the statement should contain the following information:
 - The reasons for choosing the preferred policies for the NDP as adopted in the light of other reasonable alternatives dealt with;
 - How environmental considerations have been integrated into the NDP:
 - How consultation responses have been taken into account; and
 - Measures that are to be taken to monitor the significant environmental effects of the NDP.
 - To meet these requirements, following any further changes before adoption, a Post Adoption Statement will be published with the adopted version of the NDP.

⁶⁰ own and Country Planning Act 1990. Available at: https://www.legislation.gov.uk/ukpga/1990/8/contents.

12.3 Commenting on the Environmental Report

12.3.1 Any comments on this SEA Report should be directed through Eckington Plan Steering Group.

Appendix A: Reasonable Alternatives Report



Strategic Environmental Assessment of the Eckington Neighbourhood Development Plan

Assessment of Reasonable Alternatives

LC-448	Document Control Box
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Photo: Eckington Bridge by Neil Davidson

About this report & notes for readers

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The conclusions below are based on the best available information, including information that is publicly available. No attempt to verify these secondary data sources has been made and they have assumed to be accurate as published.

This report was prepared in September 2018 and is subject to and limited by the information available during this time.

This report has been prepared with reasonable skill, care and diligence within the terms of the contract with the client. Lepus Consulting accepts no responsibility to the client and third parties of any matters outside the scope of this report. Third parties to whom this report or any part thereof is made known rely upon the report at their own risk.

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

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Acronyms

ALC Agricultural Land Class

AONB Area of Outstanding Natural Beauty

BMV Best and most versatile
CA Conservation Area

DEFRA Department for Environment, Food and Rural Affairs

IRZ Impact Risk Zone

LCA Landscape Character Assessment

LWS Local Wildlife Site

MHCLG Ministry for Housing, Communities and Local Government

NDP Neighbourhood Development Plan

NNR National Nature Reserve

NPPF National Planning Policy Framework

PPG Planning Policy Guidance
PRoW Public Right of Way
SA Sustainability Appraisal

SAC Special Area of Conservation

SEA Strategic Environmental Assessment

SM Scheduled Monument

SSSI Site of Special Scientific InterestSuDS Sustainable Urban Drainage SystemsSWDP South Worcestershire Development Plan

Executive Summary

E1 Lepus Consulting has prepared this Strategic Environmental Assessment (SEA) report of the Eckington Neighbourhood Development Plan (NDP) on behalf of Eckington Parish Council. This report should be read in conjunction with the Eckington NDP SEA Scoping Report.

The purpose of this report is to assess the reasonable alternative sites identified in the Eckington NDP against the SEA Framework and identify any possible cumulative impacts. In the absence of detailed design and siting information, initial mitigation has also been suggested where appropriate to help minimise adverse impacts identified in the short or long term.

E3 This report contains:

- A summary of the Neighbourhood Plan progress so far;
- The SEA Framework of objectives and indicators;
- Assumptions and limitations of this SEA report;
- The likely significant effects of the individual site proposals; and
- Recommendations for measures that may help to mitigate or avoid adverse impacts.
- This report has identified minor and major negative sustainability impacts caused by the reasonable alternative sites of the Eckington NDP. The suggested mitigation measures may reduce the severity of some of the residual negative impacts identified. It should be noted that these mitigation considerations would be unlikely to resolve the sustainability issues completely.
- Overall, a single best performing site cannot currently be identified, primarily as all sites would be likely to result in some form of negative impacts on the four SEA objectives. The close proximity of the nine sites makes identifying a best performing site across the four SEA objectives difficult. Site-specific analysis could be used to assess the cultural heritage and landscape impacts of each site in more detail.

1 Introduction

1.1 This report

- 1.1.1 Lepus Consulting has been appointed to undertake a Strategic Environmental Assessment (SEA) of the Draft Eckington Neighbourhood Development Plan (NDP) behalf of Eckington Parish Council.
- 1.1.2 The role of SEA is to inform the plan-making group in their selection and assessment of reasonable alternatives. The findings of the SEA can help with refining and further developing these reasonable alternatives in an iterative and on-going way. The SEA findings do not form the sole basis for decision-making; other studies, the feasibility of the reasonable alternative and consultation feedback will also contribute to the decision.
- 1.1.3 The purpose of this document is to provide an appraisal of the reasonable alternatives for site allocations considered by Eckington NDP during their plan-making process, in line with Article 5 Paragraph 1 of Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment¹ (SEA Directive):

"Where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated".

¹ EU Council (2001) Directive 2001/42/EC of the European Parliament and of the Council. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN [Date Accessed: 12/09/18]

1.1.4

Sites included in this assessment of reasonable alternatives were provided by the NDP group in the 'Eckington Call for Sites: Site Assessment Report²'; which provides basic site information on the size of site, ownership and headline environmental features. No information was provided on site density / housing numbers and as such this information has not formed part of this assessment.

1.1.5

This document also provides information in relation to the likely characteristics of effects, as per Annex II of the SEA Directive (see **Box 1.1**).

² Foxley Tagg Planning (2015) Eckington Call for Sites: Site Assessment Report.

Box 1.1: Annex II of the SEA Directive³

Criteria for determining the likely significance of effects referred to in Article 3(5) of the SEA Directive.

The characteristics of plans and programmes, having regard, in particular, to:

- the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;
- the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
- the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
- environmental problems relevant to the plan or programme; and
- the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to wastemanagement or water protection).

Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:

- the probability, duration, frequency and reversibility of the effects;
- the cumulative nature of the effects;
- the transboundary nature of the effects;
- the risks to human health or the environment (e.g. due to accidents);
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);
- the value and vulnerability of the area likely to be affected due to:
- special natural characteristics or cultural heritage;
- exceeded environmental quality standards or limit values;
- intensive land-use; and
- the effects on areas or landscapes which have a recognised national, Community or international protection status.

1.2 The Eckington Neighbourhood Development Plan

1.2.1 The creation of neighbourhood development plans started with the Government's Localism Act 2011. One of the Localism Act's key components is the NDP; a new tier in planning policy which enables local people to shape the development of the community in which they live.

³ EU Council (2001) Directive 2001/42/EC of the European Parliament and of the Council. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32001L0042&from=EN [Date Accessed: 11/09/18]

- 1.2.2 The Eckington NDP has been developed on behalf of Eckington Parish Council by local volunteers within the Neighbourhood Plan Steering Group. Evidence gathering and analyses from 2014, including public meetings, consultation workshops and planning assessments, have led to the creation of policies and the existing documentation.
- 1.2.3 The NDP is a land-use plan, prepared for town and country planning purposes. It sets out a framework for future development consents within the Eckington Parish. Once adopted, the NDP will form part of the framework for planning in the South Worcestershire districts, which includes Wychavon. This important legal position means that it has to regard national planning policy and to be in 'general conformity' with the strategic planning policies set out in the adopted South Worcestershire Development Plan (SWDP) 2016.
- 1.2.4 Within the adopted South Worcestershire Development Plan, Eckington is classed as a Category 2 village and has been allocated an indicative number of 20 dwellings.

1.3 The Cotswolds Area of Outstanding Natural Beauty (AONB)

1.3.1 Paragraph 172 of the Revised NPPF⁴ states that:

"Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues ... The scale and extent of development within these designated areas should be limited. Planning permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and

⁴ MHCLG (2018) Revised National Planning Policy Framework. Available at: https://www.gov.uk/government/collections/revised-national-planning-policy-framework [Date Accessed: 10/09/18]

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- any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated".
- 1.3.2 Although the development proposed within Eckington Parish is not described as 'major development', it is important to consider possible detrimental impacts on the surrounding and to assess all possible reasonable alternatives, including assessing sites outside of the Cotswolds AONB.
- 1.3.3 Polices set out in the adopted Cotswolds Management Plan 2013 2018 and the emerging Management Plan 2018 2023⁵ should be adhered to, in particular those focusing on Landscape and Local Distinctiveness. Advice provided within the Cotswolds Conservation Board Position Statement on Preparing Neighbourhood Plans in an AONB ⁶ should also be closely adhered to.

⁵ Cotswolds Conservation Board (2018) Cotswolds AONB Management Plan. Available at: https://www.cotswoldsaonb.org.uk/planning/cotswolds-aonb-management-plan/ [Date Accessed: 17/09/18]

⁶ Cotswolds Conservation Board (2015) Preparing Neighbourhood Plans in an AONB. Available at: https://www.cotswoldsaonb.org.uk/wp-content/uploads/2017/08/8_appendix-a-position-statement-on-neighbourhood-plans-final-version-for-board-approval.pdf [Date Accessed: 17/09/18]

1.4 Best Practice Guidance

1.4.1 A range of documents have been utilised in preparing the SEA of the Eckington NDP. These are presented in **Box 1.2** below.

Box 1.2: Best Practice Guidance for SA/SEA

Lepus follows national guidance and best practice standards set out for SEA which includes:

- European Commission (2004) Implementation of Directive 2001/42 on the assessment of the effects of certain plan and programmes on the environment⁷.
- Office of Deputy Prime Minister (2005) A Practical Guide to the SEA Directive⁸.
- Ministry of Housing, Communities and Local Government (2018) National Planning Policy Framework (NPPF)⁹.
- Ministry of Housing, Communities and Local Government (2018) Planning Practice Guidance (PPG)¹⁰.
- Royal Town Planning Institute (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans¹¹.

https://www.gov.uk/government/collections/planning-practice-guidance [Date Accessed: 10/09/18]

⁷ Available at: http://ec.europa.eu/environment/eia/sea-legalcontext.htm [Date Accessed: 10/09/18]

⁸ Available at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file /7657/practicalguidesea.pdf [Date Accessed: 10/09/18]

⁹ MHCLG (2016) Planning practice guidance. Available at:

http://planningguidance.communities.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/ [Date Accessed: 10/09/18]

¹⁰ MHCLG (2018) Planning Practice Guidance. Available at:

¹¹ RTPI (2018) Strategic Environmental Assessment, Improving the effectiveness and efficiency of SEA/SA for land use plans, January 2018. Available at: http://www.rtpi.org.uk/media/2668152/sea-sapracticeadvicefull2018c.pdf [Date Accessed: 10/09/18]

1.5 Structure of the Eckington NDP

1.5.1 Version No. 20 of the Eckington NDP is presented in 16 sections:

- 1) Introduction;
- 2) About Eckington;
- 3) The Neighbourhood Plan;
- 4) Key Issues;
- 5) Vision and Objectives;
- 6) Summary of Plan;
- 7) Introduction to Policies;
- 8) Housing;
- 9) Allocation of Sites;
- 10) Community;
- 11) Economy;
- 12) Environment;
- 13) Implementation;
- 14) Glossary;
- 15) Annexed Documents; and
- 16) Appendices.

2 Methodology

2.1 Scoping stage

2.1.1 The first phase of the SEA process was the scoping stage. The Eckington NDP Scoping Report was prepared by Lepus Consulting in September 2018¹². This represented Stage A of SEA, according to the MHCLG (2018) Guidance on Neighbourhood Planning¹³. Scoping is the process of deciding the scope and level of detail of a SEA, including the environmental effects and alternatives to be considered, the assessment methods to be used, and the structure and contents of the SEA Report. Scoping concluded that biodiversity and geodiversity, cultural heritage, landscape and natural resources would be taken through to the next stage of the SEA process.

2.2 Assessment of Reasonable Alternatives

- 2.2.1 The appraisal process has used the SEA Framework (**Appendix A**), the review of plans, programmes and policies, and the baseline (including various mapped data sources), as presented in the SEA Scoping Report, to assess each reasonable alternative. Assessments have been undertaken using this empirical evidence and, to a lesser extent, expert judgement.
- The first stage of assessment considers the questions in the SEA Framework, using the results to determine whether the proposal is likely to bring positive, negative or uncertain effects in relation to each SEA Objective. The precautionary principle ¹⁴ is applied within these assessments.
- 2.2.3 The second stage of assessment considers the level of significance of the effects identified in the first stage. To do so, it draws on criteria for determining significance of effects in Annex II of the SEA Directive (see Box 2.1). Any assessment rated as negligible does not constitute a significant effect.

¹² Lepus Consulting (2018) Strategic Environmental Assessment of the Eckington Neighbourhood Development Plan: Scoping Report

¹³ MHCLG (2018) Guidance: Neighbourhood Planning. Available at: https://www.gov.uk/guidance/neighbourhood-planning--2 [Date Accessed: 10/09/18]

¹⁴ Judgment of 7 September 2004 in case C-127/02 (Waddenzee, paragraph 45).

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A single value from **Table 2.1** is allocated to each SEA Objective for each site and discussed in the supporting text narrative. When selecting a single value to best represent the sustainability performance of the relevant SEA Objective, the precautionary principle is used. This is a worst-case scenario approach. If a positive effect is identified in relation to one criterion within the SEA Framework and a negative effect is identified in relation to another criterion within the same SEA Objective, that proposal will be given an overall negative value for that objective.

2.3 Significance

- 2.3.1 The nature of the effect can be either beneficial or adverse depending on the type of development and the design and mitigation measures proposed. Significance can be categorised as minor or major. **Table 2.1** lists the significance matrix and explains the terms used.
- 2.3.2 Each proposal assessed in this report is awarded a score for each SEA Objective in the Framework, as per **Table 2.1**. Scores are not intended to be summed. Each score is an indication of the overall sustainability performance for the proposal being assessed.
- 2.3.3 By assessing impacts against each SEA Objective for every proposal in this way, the environmental, social and economic sustainability of each site and policy can be understood and expressed. An adverse impact against one or more SEA Objectives does not render that site or policy as unsustainable or unsuitable. All impacts should be taken together as a whole to better understand the site's sustainability performance.
- 2.3.4 It is important to note that this method of scoring and presenting a reasonable alternative's sustainability performance is supported in every case with narrative text which details the key decision-making criteria behind each awarded score. Assumptions and limitations in **Table 2.1** offer further insight into how each score was arrived at.

Table 2.1: Guide to terms used in the significance matrix.

Significance	Definition (not necessarily exhaustive)				
Major Negative 	 The size, nature and location of an site would be likely to: Permanently degrade, diminish or destroy the integrity of a quality receptor, such as a feature of international, national or regional importance; Cause a very high-quality receptor to be permanently diminished; Be unable to be entirely mitigated; Be discordant with the existing setting; and/or Contribute to a cumulative significant effect. 				
Minor Negative -	 The size, nature and location of an site would be likely to: Not quite fit into the existing location or with existing receptor qualities; and/or Affect undesignated yet recognised local receptors. 				
Negligible O	Either no impacts are anticipated, or any impacts are anticipated to be negligible.				
Uncertain +/-	It is entirely uncertain whether impacts would be positive or adverse.				
Minor Positive +	 The size, nature and location of an site would be likely to: Improve undesignated yet recognised receptor qualities at the local scale; Fit into, or with, the existing location and existing receptor qualities; and/or Enable the restoration of valued characteristic features. 				
Major Positive ++	 The size, nature and location of an site would be likely to: Enhance and redefine the location in a positive manner, making a contribution at a national or international scale; Restore valued receptors which were degraded through previous uses; and/or Improve one or more key elements/features/ characteristics of a receptor with recognised quality such as a specific international, national or regional designation. 				

2.4 Geographic scale

2.4.1

Geographic scale relates primarily to the level of importance of the receptor, and hence it's sensitivity, or the level at which it is designated, if applicable. Geographic scale may also refer to the physical area of the receptor, or the part of the receptor likely to be affected. A guide to the range of scales used in the impact significance matrix is presented in **Table 2.2.**

Table 2.2: Geographic scales and sensitivity of receptors

Scale and sensitivity	Typical criteria
International/ national	Designations that have an international aspect or consideration of transboundary effects beyond national boundaries. This applies to effects and designations/receptors that have a national or international dimension.
Regional	This includes the regional and sub-regional scale, including county-wide level and regional areas.
Local	This is the district and neighbourhood scale.

2.5 Impact magnitude

2.5.1

Impact magnitude relates to the degree of change the receptor will experience, including the probability, duration, frequency and reversibility of the effects. The magnitude of an impact, or the size of an effect, is determined based on the susceptibility of a receptor to the type of change that will arise, as well as the value of the affected receptor (see **Table 2.3**). On a strategic basis, the appraisal considers the degree to which a location can accommodate change without detrimental effects on known receptors (identified in the baseline).

2.5.2 The description of effects will also be in accordance with the footnote of Annex 1(f) of the SEA Directive, where feasible, which states:

"These effects should include secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects".

Table 2.3: Impact magnitude

Impact magnitude	Typical criteria
High	 Likely total loss of or major alteration to the receptor in question; Provision of a new receptor/feature; or The impact is permanent and frequent.
Medium	Partial loss/alteration/improvement to one or more key features; or The impact is one of the following: • Frequent and short-term; • Frequent and reversible; • Long-term (and frequent) and reversible; • Long-term and occasional; or • Permanent and occasional.
Low	Minor loss/alteration/improvement to one or more key features of the receptor; or The impact is one of the following: Reversible and short-term; Reversible and occasional; or Short-term and occasional.

2.6 General assumptions and limitations

2.6.1 There are a range of uncertainties and limitations that should be borne in mind when considering the assessments and conclusions in this report.

Predicting effects

- 2.6.2 SEA is a tool for predicting potential significant effects. Predicting effects relies on an evidence-based approach and incorporates expert judgement. It is often not possible to state with absolute certainty whether effects will occur, as many impacts are influenced by a range of factors such as the design and the success of mitigation measures.
- 2.6.3 The assessments in this report are based on the best available information, including that provided to us by the South Worcestershire Council's and information that is publicly available. Every attempt has been made to predict effects as accurately as possible.

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2.6.4 SEA operates at a strategic level which uses available secondary data for the relevant SEA Objective. All reasonable alternatives are assessed in the same way using the same method. Sometimes, in the absence of more detailed information, forecasting the potential impacts of development can require making reasonable assumptions based on the best available data and trends. However, all reasonable options must be assessed in the same way and any introduction of site-based detail should be made clear in the

SA report as the new data could potentially introduce bias and skew the

Distances

2.6.5 Where distances have been measured, these are 'as the crow flies' from the furthest edge of the site unless specified otherwise. New residents require access to a range of facilities and amenities. The distances that are considered to be sustainable in this regard are based on the Barton, Grant and Guise (2010) Shaping Neighbourhoods for Local Health and Global Sustainability¹⁵.

2.7 Accessible Natural Greenspace Standards

findings of the assessment process.

2.7.1 The Accessible Natural Greenspace Standards (ANGSt), developed in the 1990s¹⁶ and updated in 2008, are based on the minimum distances people would travel to the natural environment. It is considered that, should new developments meet this standard, it would improve access to green spaces for residents, improve the naturalness of green spaces and improve the connectivity between green spaces. Good access to natural greenspaces improves the health and wellbeing of residents, whilst potentially also reducing visitor pressures on biodiversity hotspots¹⁷. ANGSt are presented in **Box 2.2**.

¹⁵ Barton, H., Grant. M. & Guise. R. (2010) Shaping Neighbourhoods: For local health and global sustainability. January 2010

¹⁶ Accessible Natural Greenspace Standards in Towns and Cities (2003) A review and toolkit for their implementation, England Nature Research Report, No 526

¹⁷ Natural England (2010) 'Nature Nearby' Accessible Natural Greenspace Standard, March 2010

Box 2.2: Accessible Natural Greenspace Standards (ANGSt)

ANGSt recommend that everyone, wherever they live, should have an accessible natural greenspace of:

- At least 2ha in size, no more than 300m (5 minutes' walk) from home;
- At least one accessible 20ha site within 2km of home;
- One accessible 100ha site within 5km of home:
- One accessible 500ha site within 10km of home; plus
- A minimum of one hectare of statutory Local Nature Reserves per thousand population.

2.8 Objective specific assumptions and limitations

- 2.8.1 There are a number of assumptions and limitations which should be borne in mind when considering the results and conclusions of this assessment. By stating these assumptions, it allows the site assessments to focus on site specific impacts and avoid repetition in the individual assessment text.
- 2.8.2 This section also states some of the indicators of the SEA Framework which are consistent across all sites this information has been considered within each site assessment in addition to other site-specific detail presented in Chapter 3. Some of these assumptions and limitations are presented in Table 2.4.

Table 2.4: Assumptions, limitations and uniformities of the process for each SEA objective.

Table 2.4: Assumptions, limitations and uniformities of the process for each SEA objective.					
SEA Objective	Assessment Assumptions				
1. Biodiversity and Geodiversity	 Site proposals have been assessed for the extent to which they may help to protect, enhance and expand biodiversity or geodiversity in the local area. This has included assessing the likely impacts of the construction and occupation of new homes on designated and protected biodiversity assets. Site proposals coinciding with a designated or protected biodiversity asset would be expected to result in the total or partial loss of this asset. Adverse effects are commonly associated with impacts of the construction phase (e.g. habitat fragmentation and noise, air and light pollution associated with the construction process and construction vehicles) as well as the operation/occupation phase (e.g. increases in public access associated disturbances, increases in local congestion resulting in a reduction in air quality at the designation and the increased risk of pet predation). It is assumed that construction and occupation of previously undeveloped greenfields will result in a net reduction in vegetation cover in the Plan area. Proposals which will result in the loss of a greenfield are therefore expected to contribute towards a cumulative loss in vegetation cover. This would also be expected to lead to greater levels of fragmentation and isolation for the local ecological network, such as due to the loss of steeping stones and corridors. 				

SEA Objective	Assessment Assumptions				
9	 Impacts on heritage assets will be largely determined by the specific layout and design of development proposals. These are currently unknown and therefore the likelihood, extent and permanence of effects on heritage assets is somewhat uncertain at this stage. In line with the precautionary principle, where adverse impacts cannot be ruled out and where there is no evidence that shows how the potential adverse effects will not arise, the adverse effects are assumed to occur. This is reflected in the scoring for each Plan proposal. Adverse scores are recorded for sites which would be expected to have an 				
2. Cultural Heritage	adverse impact on sensitive cultural heritage designations, including Listed Buildings, Scheduled Monuments and Conservation Areas.				
Cultur	 Adverse impacts on Grade II* Listed Buildings are considered to be more severe than adverse impacts on Grade II Listed Buildings. 				
.2	 Adverse impacts on heritage assets are predominantly associated with impacts on the existing setting of the asset and the character of the local area, as well as adverse impacts on views of, or from, the designation. 				
	 Development which would discord with the local character or setting, such as due to design, layout, scale or type, would be expected to adversely impact the setting of nearby heritage assets for which the character of the local area is an important component of setting. 				
	• Site proposals have been assessed for the extent to which they may impact on the character of local landscapes and townscapes as well as the extent to which they may alter views for sensitive receptors.				
3. Landscape	 Baseline data on the landscape types (LTs) within Eckington have been derived from the Worcestershire Landscape Character Assessment Supplementary Guidance¹⁸. There are four LTs within Eckington Parish. All sites are located within the Principle Village Farmlands LT. 				
	 Baseline data on the landscape character have been derived from the Cotswolds AONB Landscape Character Assessment^{19.} The land within the AONB at Eckington is within the 'Bredon Hill' Escarpment Outlier Character Area. 				
	 The rural Parish offers long distance and distinctive countryside views to sensitive receptors including local residents and users of the local Public Right of Way (PRoW) network. 				

¹⁸ Worcestershire County Council (2011) Landscape Character Assessment Supplementary Guidance. Available at:

http://www.worcestershire.gov.uk/downloads/file/4788/landscape_character_assessment_supplement ary_guidance [Date Accessed: 21/09/18]

¹⁹ Cotswolds AONB Partnership (2002) Cotswolds AONB Landscape Character Assessment. Available at: https://www.cotswoldsaonb.org.uk/our-landscape/landscape-character-assessment/ [Date Accessed: 19/09/18]

SEA Objective	Assessment Assumptions				
	 The level of fluvial flood risk present at each site is based on the Environment Agency's flood risk data, such that: 				
	 Flood Zone 3: 1% - 3.3+% chance of flooding each year; 				
	o Flood Zone 2: 0.1% - 1% chance of flooding each year; and				
	 Flood Zone 1: Less than 0.1% chance of flooding each year. 				
	• There is the possibility of higher flood risks elsewhere if a site is adjacent to Flood Zones 2 or 3.				
	• Surface water flood risk: Areas of high risk have more than a 3.3% chance of flooding each year, medium risk between 1% - 3.3%, low risk between 0.1% and 1% and very low risk less than a 0.1% chance.				
4. Natural Resources	Site proposals have been assessed for the extent to which they may result in the loss of previously undeveloped land and agriculturally and ecologically valuable, non-renewable, soils.				
. Natural B	 In accordance with the core planning principles of the NPPF, development proposals for previously developed land (PDL) are recognised as an efficient use of land. 				
4	 The Agricultural Land Class (ALC) system classifies five categories according to versatility and suitability for growing crops. The top three grades, Grade 1,2 and 3a, are referred to as the 'best and most versatile' (BMV) soils. In line with the precautionary principle, it is assumed that each site is Grade 3a and therefore represents some of the BMV soils in the Parish. 				
	 Development proposals for previously undeveloped sites are expected to pose a threat to ecologically and agriculturally valuable soil within the site perimeter due to the impacts of construction and occupation, such as excavation, erosion and pollution. 				
	• Development of land which is calculated as being more than 0.1% of the Plan area is seen as a major adverse impact on soils within the Parish.				

3 Assessment of Reasonable Alternatives

3.1 Reasonable Alternatives

- 3.1.1 The SEA Directive requires that the SEA process considers "reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme" (Article 5) and gives "an outline of the reasons for selecting the alternatives dealt with" (Annex I).
- The purpose of this Reasonable Alternatives SEA Report is to enable plan makers to make an informed decision about the final content of the plan. The role of SEA is to inform the plan making group in their selection and assessment of reasonable alternatives.
- The findings of this Reasonable Alternatives SEA Report can help with refining and further developing these options in an iterative and on-going way. The SEA findings do not form the sole basis for decision-making; other studies, the feasibility of the option and consultation feedback will also contribute to the decision of identifying a preferred option.
- 3.1.4 The results of the Reasonable Alternatives SEA Report may reveal that there is no single, best performing option. Where there is no obvious discernible difference at a strategic scale, the SEA process will record this as an outcome.
- 3.1.5 It should be noted that a further SEA Report will be produced, known as an Environmental Report.

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3.1.6

The Planning Practice Guidance (PPG) for Strategic environmental assessment and sustainability appraisal²⁰ states that the environmental report accompanying a neighbourhood plan should "outline the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives".

"Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable.

"Proposals in a draft neighbourhood plan, and the reasonable alternatives should be assessed to identify the likely significant effects of the available options. Forecasting and evaluation of the significant effects should help to develop and refine the proposals in the neighbourhood plan".

- 3.1.7 The Planning Practice Guidance (PPG) for Neighbourhood Planning ²¹ states that "a neighbourhood plan can allocate additional sites to those in a Local Plan where this is supported by evidence to demonstrate need above that identified in the Local Plan".
- 3.1.8 The remainder of this chapter sets out the SEA of reasonable alternative sites. The environmental assessment results for each site can be found in a single line matrix of values. The values in the matrix are contextual rather than absolute. Tables have been prepared which include assessment narrative which explains the sustainability issues in more detail.

3.2 Site Assessments

3.2.1 There are nine alternative sites, shown in **Figure 3.1**, that have been identified as reasonable alternatives for the Eckington NDP. All the sites have been assessed as per the methodology set out in **Chapter 2**.

²⁰ MHCLG (2018) Guidance: Strategic environmental assessment and sustainability appraisal. Available at: https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal [Date Accessed: 19/09/18]

²¹ MHCLG (2018) Guidance: Neighbourhood Planning. Available at: https://www.gov.uk/guidance/neighbourhood-planning--2 [Date Accessed: 19/09/18]

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Figure 3.1: Call for Sites map²²

 $^{^{\}rm 22}$ Foxley Tagg Planning (2015) Eckington Call for Sites: Site Assessment Report.

3.3 ECK-01

3.3.1 ECK-01 is approximately 1.5ha of greenfield land located to the north west of Eckington village, north of Hammock Road. The Site is currently used for agricultural purposes.

SEA Objective	Score	Explanation
Biodiversity and Geodiversity	-	ECK-01 is approximately 2.3km west of the Bredon Hill Special Area of Conservation (SAC) and Bredon Hill National Nature Reserve (NNR). As the Site is less than 2.5km from the SAC and air pollution is a known threat to the SAC, a minor negative impact on the biodiversity and geodiversity objective cannot be ruled out. ECK-01 is approximately 65m south west of the Eckington Railway Cutting SSSI. The Site is also approximately 840m east of the River Avon Local Wildlife Site (LWS) and Special Wildlife Site (SWS). The Site is within an Impact Risk Zone (IRZ) of the SSSI where development of 50 units or more may have a negative impact on the SSSI. As a total of 20 dwellings are required across the Parish, no adverse impact would be expected.
Cultural Heritage	-	ECK-01 is adjacent to the Grade II Listed Building 'Lower End Farmhouse' and Eckington Conservation Area, both located to the south of the site. It is considered to be likely that development at this location would alter the setting of these heritage assets and therefore would be likely to have a minor negative impact on the cultural heritage objective.
Landscape	-	It is unlikely that development at ECK-01 would be visible from the Cotswolds AONB primarily due to the Site being located on the opposite side of Eckington village. However, development here could potentially result in urban sprawl into the surrounding, open countryside to some extent. Development at ECK-01 would be likely to alter the views for sensitive receptors including the local PRoW network and residents of Hammock Road. Therefore, development at this location could potentially have a minor negative impact on the landscape objective.
Natural Resources	-	ECK-01 is situated on Agricultural Land Class (ALC) Grades 2 and 3 soils and therefore is considered to be some of the best and most versatile (BMV) soils in the Parish. All development on greenfield land would result in the permanent and irreversible loss of ecologically and agriculturally valuable soils, but as the Site proposed only covers 1.5ha of land, it is considered to be likely that development at this location would result in a minor negative impact on the local soils. The Site also coincides with Flood Zone 1 so development at this location would be unlikely to place new residents in locations at risk of flooding.

3.4 ECK-02

3.4.1

ECK-02 is located to the north of Eckington village, north of New Road and east of Pershore Road. The Site is a greenfield currently used for agricultural purposes. The Site proposed is approximately 4.5ha.

SEA Objective	Score	Explanation
Biodiversity and Geodiversity	-	ECK-02 is approximately 2km west of Bredon Hill SAC and Bredon Hill NNR, as well as being 145m east of the Eckington Railway Cutting SSSI. The Site is within an IRZ, but the quantity of development proposed would not be likely to have a negative impact on the SSSI. As the Site is less than 2.5km from Bredon Hill SAC, a minor negative impact on the biodiversity and geodiversity objective cannot be ruled out.
Cultural Heritage	-	ECK-02 is adjacent to the Grade II Listed Building 'Litle Thatch' and Eckington Conservation Area. Development at this Site would therefore be likely to alter the setting of these historic assets. Development at this location could potentially have a minor negative impact to the cultural heritage objective.
Landscape	-	Development at ECK-02 is expected to be visible from the AONB and could potentially alter some important views. Development here would also be likely to alter important views for sensitive receptors, such as users of the local PRoW network and residents of Pershore Road and New Road. As a greenfield site, development here would be expected to alter the character of the local landscape to some extent. Development here could potentially result in urban sprawl into the surrounding, open countryside. Overall, development at this site would be likely to have a minor negative impact on the landscape objective.
Natural Resources		The Site is located on Grade 2 ALC soils, and as the site is proposed as 4.5ha, there is likely to be a permanent and irreversible loss of BMV soils and would have a minor negative impact on the local soils. The Site coincides with fluvial Flood Zone 1 so development at this location would be unlikely to place new residents in locations at risk of fluvial flooding. Within ECK-02, there are areas of medium and high-risk surface water flooding and therefore a major negative impact on the natural resources objective cannot be ruled out.

3.5 ECK-03

3.5.1 ECK-03 is a long and narrow greenfield site located to the south of Eckington village, south of Hacketts Lane. The 0.64ha site is currently used for agriculture.

SEA Objective	Score	Explanation
Biodiversity and Geodiversity	-	This Site is approximately 1.6km west of Bredon Hill SAC and NNR. As the site is less than 2.5km from Bredon Hill SAC, a minor negative impact on the biodiversity and geodiversity objective cannot be ruled out.
Cultural Heritage	-	The north east corner of ECK-03 is located adjacent to the Grade II Listed Building 'Quietways' and the Eckington Conservation Area. Development at this location is likely to alter the setting of these historic assets, and as a consequence, would be likely to have a minor negative impact on the cultural heritage objective.
Landscape	-	Development at ECK-03 would be likely to alter the views for sensitive receptors, some of which may include residents of Hacketts Lane and users of the local PRoW network. Development here could potentially alter views from the Cotswolds AONB. As a greenfield site, development would also be expected to alter the character of the local landscape to some extent. Development at ECK-03 would be likely to have a minor negative impact in the landscape objective.
Natural Resources	-	ECK-03 is located in Flood Zone 1 and development at this location would be unlikely to place new residents at risk of flooding. Although the proposed site is 0.64ha in size, it is located on Grade 2 ALC land and development would result in the permanent loss of BMV soils. Therefore, a minor negative impact on the natural resources objective cannot be ruled out.

3.6 ECK-04

3.6.1

ECK-03 is a 0.37ha site located to the east of Eckington village, between Nafford Road to the north and Upper End to the south. The Site is a greenfield²³ and there are a number of disused barns currently on Site.

SEA Objective	Score	Explanation
Biodiversity and Geodiversity	-	This Site is approximately 1.6km away from Bredon Hill SAC and NNR. As the Site is less than 2.5km from Bredon Hill SAC, a minor negative impact on the biodiversity objective cannot be ruled out. The presence of protected and priority species within the disused barns at this site is possible.
Cultural Heritage	-	It is unlikely that any development at ECK-04 would be visible from Eckington Conservation Area. However, the Site is adjacent to several Listed Buildings and would be likely to alter the setting of some of these buildings to some extent. Development at this site would therefore be likely to have a minor negative impact on the cultural heritage objective.
Landscape	-	It is expected that development on ECK-04 would be visible from the Cotswolds AONB, as well as sensitive receptors, such as residents of Nafford Road and Upper End and users of the local PRoW network. It is uncertain the extent to which development at this location would alter the character of the local landscape. Overall, development here would be likely to have a minor negative impact on the landscape objective.
Natural Resources	-	ECK-04 is located within fluvial Flood Zone 1 and so would be unlikely to place new residents in locations at risk of fluvial flooding. However, there is a small area of low-risk surface water flooding within the Site. The Site is located on Grade 2 ALC soils and is therefore considered to be some of the Parish's BMV soils. Although only a small site, development here would result in the permanent and irreversible loss of soils and therefore a minor negative impact on the natural resources objective cannot be ruled out.

 $^{^{23}}$ Change of definition for brownfield land to greenfield based on the definition of 'previously developed land' provided in the revised NPPF.

3.7 ECK-05

3.7.1

ECK-05 is located to the south of Eckington village, to the east of Ninesquares. The Site is approximately 0.51ha and currently used for agricultural purposes.

SEA Objective	Score	Explanation
Biodiversity and Geodiversity	-	ECK-05 is located approximately 1.7km east of Bredon Hill SAC and NNR. At this distance away, a minor negative impact on the biodiversity and geodiversity objective cannot be ruled out.
Cultural Heritage	-	ECK-05 is located to the south of the Eckington Conservation Area and two Grade II Listed Buildings; 'Barn at Days Farm' and Cottage in Days Farmland'. It is considered to be likely that development at ECK-05 would alter the settings of these assets and therefore have a minor negative impact on the cultural heritage objective.
Landscape	-	ECK-05 is expected to be viewable from the Cotswolds AONB and therefore could potentially alter some important views. It is uncertain to the extent to which development at this location would alter the views for sensitive receptors, such as local residents and users of the PRoW network as well as alter the character of the local landscape. Overall, development at this location could potentially have a minor negative impact on the landscape objective.
Natural Resources		ECK-05 is located on greenfield land and consists of ALC Grade 2 soils. Development at this site would be likely to result in the permanent and irreversible loss of ecologically and agriculturally important soils. The Site is within fluvial Flood Zone 1 so would help to ensure new residents are not placed in locations at risk of fluvial flooding. However, small sections of the northern and southern area of the Site are located within an area considered to be at high-risk from surface water flooding. Therefore, development at this site could potentially have a major negative impact on the natural resources objective.

3.8 ECK-06a

3.8.1

ECK-06a is located south of Eckington village, west of Tewkesbury Road. It is approximately 1.4ha of greenfield land, currently used for agricultural purposes, with some parts of the land associated with the nearby Readyhedge nursery.

SEA Objective	Score	Explanation
Biodiversity and Geodiversity	-	ECK-06a is less than 2.5km from Bredon Hill SAC, approximately 1.7km east. At this stage of assessment, a minor negative impact on the biodiversity objective cannot be ruled out.
Cultural Heritage	0	ECK-06a is approximately 195m south of the Eckington Conservation Area and any Listed buildings. It is considered to be unlikely that development at this location would be visible from any historic assets. Therefore, development here would be likely to have a negligible impact on the cultural heritage objective.
Landscape	-	It is considered to be likely that development at ECK-06a would be visible from the Cotswolds AONB as well as residents of Tewkesbury Road, whom are sensitive receptors to the development. Overall, a minor negative impact on the landscape objective cannot be ruled out.
Natural Resources		The north west corner of ECK-06a has been identified as being at high-risk of surface water flooding. Development in this area may potentially place new residents at risk from surface water flooding. In addition development here could exacerbate flooding in other areas of the village. The site is located within fluvial Flood Zone 1. The Site is a greenfield consisting Grade 1 and 2 ALC soils. Development at this location would be expected to result in the permanent and irreversible loss of BMV soils within the Parish. Overall, a major negative impact on the natural resources objective cannot be ruled out.

3.9 ECK-06b

3.9.1 ECK-06b is a small site of 0.25ha located to the south of Eckington village. It is not adjacent to any current roads. The Site is a greenfield, currently used for agriculture,

SEA Objective	Score	Explanation
Biodiversity and Geodiversity	-	ECK-06b is located approximately 1.8km east of Bredon Hill SAC and therefore, a minor negative impact on the biodiversity and geodiversity objective cannot be ruled out.
Cultural Heritage	0	ECK-06b is situated 170m south of the Eckington Conservation Area and development at this location would not be viewable from the Conservation Area or any Listed Buildings. Therefore, development here would have a negligible impact on the cultural heritage objective.
Landscape	0	It is uncertain if development at ECK-06b would visible from the Cotswolds AONB. Should it be visible it may have the potential to alter some important views, but as a small site, it is likely that any impacts would be negligible. The same can be said for impact on sensitive receptors, primarily local residents. Development at ECK-06b would be likely to have a negligible impact on the landscape objective.
Natural Resources risk fi poter exace deve		Almost the entirety of ECK-06b is located within an area of high-risk from surface water flooding. Development here has the potential to place new residents at risk of flooding and also exacerbate flooding issues in surrounding area. The Site is located on Grade 1 and 2 ALC soils, and as such, development at this location would be expected to result in the permanent and irreversible loss of ecologically and agriculturally important soils. Development at this location would be expected to have a major negative impact on the natural resources objective.

3.10 ECK-07

3.10.1

ECK-07 is located to the south west of Eckington village, south of Station Road. The 5.47ha site is currently a working horticultural nursery, known as 'Readyhedge'.

SEA Objective	Score	Explanation
Biodiversity and Geodiversity	-	The Site is approximately 1.8km west of Bredon Hill SAC and NNR. ECK-07 is approximately 470m south of the Eckington Railway Cutting SSSI and approximately 780m east of the River Avon and would be unlikely to have a negative impact on the SSSI or LWS, however, a minor negative impact on Bredon Hill SAC and NNR cannot currently be ruled out.
Cultural Heritage	-	ECK-07 is located adjacent to the Grade II Listed Building 'Holly Cottage' as well as the Eckington Conservation Area. It is likely that development at this location would alter the setting of these the heritage assets and therefore would be likely to have a minor negative impact on the cultural heritage objective.
Landscape	-	Although a brownfield site, it is considered to be likely that residential development at ECK-07 would alter the character of the local landscape to some extent. The Site is likely to be visible from the Cotswolds AONB and therefore alter some important views. Development would also be likely to alter views for sensitive receptors, including users of the local PRoW network and residents of Station Road and Avon Drive. Development could potentially alter the character of the local landscape to some extent. Development at this Site could potentially have a minor negative impact on the landscape objective.
Natural Resources	-	ECK-07 is located on Grade 1 and 2 ALC soils, however, as a brownfield site, there is expected to be a negligible loss of soil. The Site is within areas of low and medium-risk surface water flooding. Development at this location has the potential to exacerbate flood risk in surrounding areas and place some residents at risk of flooding. This site would be likely to have a minor negative impact on the natural resources objective.

3.11 ECK-08

3.11.1

ECK-08 is a 0.9ha greenfield site located outside the village boundary to the north. The Site is located west of Pershore Road, opposite Eckington Riverside Park. The Site is a greenfield used for agricultural purposes.

SEA Objective	Score	Explanation	
Biodiversity and Geodiversity	0	ECK-08 is over 2.5km west of Bredon Hill SAC and NNR. It is therefore likely that development here would not have a negative impact on the SAC. The Site is approximately 150m north of the Eckington Railway Cutting SSSI and 180m south of the River Avon LWS and SWS (Special Wildlife Site). The Site is within an IRZ, but the quantity of development proposed would not be likely to have a negative impact on the SSSI. At this stage of assessment, it is likely that development at this site would have a negligible impact on the biodiversity objective.	
Cultural Heritage	-	ECK-08 is considered to be visible from the Scheduled Monument 'Eckington Bridge'. At this stage of assessment, a minor negative impact on the cultural heritage objective cannot be ruled out.	
Landscape	-	As ECK-08 is outside of the built-up area of Eckington, it is likely that the site is visible from the AONB and would alter some sensitive views. Development here would also be likely to alter views for users of the local PRoW network. As a greenfield site outside of the urban boundary, development here would be likely to alter the character of the local landscape and therefore a minor negative impact on the landscape objective cannot be ruled out.	
Natural Resources		ECK-08 is located partially within fluvial Flood Zone 3 and as such a major negative impact on the natural resources objective cannot be ruled out. An area of low-risk surface water flooding also crosses the site. The site is a greenfield covering Grade 3 ALC land and could potentially result in the permanent loss of ecologically and agriculturally important soils.	

3.12 Overview of Assessment Results

The scoring matrix for each site assessed in this report has been brought together in **Table 3.1**.

Table 3.1: SEA scoring matrices for the sites assessed in this report.

	SEA Objective			
	1	2	3	4
Site Allocation	Biodiversity and Geodiversity	Cultural Heritage	Landscape	Natural Resources
ECK-01	-	-	-	-
ECK-02	-	-	-	
ECK-03	-	-	-	-
ECK-04	-	-	-	-
ECK-05	-	-	-	
ECK-06a	-	0	-	
ECK-06b	-	0	0	
ECK-07	-	-	-	-
ECK-08	0	-	-	

- 3.12.2 In terms of the environmental assessment results, the scoring matrix shows that most sites perform in a similar way. These similarities are due to the close proximity of the sites to one another and the fact that all sites are proposed for the same land use change: housing.
- 3.12.3 The following sections present information by SEA topic, identifying the best performing sites before finalising the section with an overall best performing site.

3.13 Biodiversity and Geodiversity

3.13.1 In terms of biodiversity and geodiversity, ECK-08 has been identified as the best performing site due to the fact this site is furthest away from Bredon Hill SAC and outside of the 2.5km zone of influence. Therefore, development at this location would be expected to result in negligible impacts on local biodiversity and geodiversity assets.

3.14 Cultural Heritage

3.14.1 In terms of cultural heritage, sites ECK-06a and ECK-06b have been identified as the best performing sites. This is because these two sites are to the south of Eckington village, and would not be expected to be visible from Listed Buildings or Eckington Conservation Area. It is unlikely that development at these two sites would impact any heritage assets.

3.15 Landscape

3.15.1 ECK-06b has been identified at the best preforming site in terms of landscape. It is considered to be unlikely that development at this site would be visible from the Cotswolds AONB or sensitive receptors such as users of the local PRoW network or local residents. Therefore, this site would be likely to have a negligible impact on the landscape objective.

3.16 Natural resources

In terms of natural resources, ECK-01 and ECK-03 could be considered to be the best preforming sites, even though they would be likely to result in some minor negative impacts in terms of loss of soil resources. Almost all of the sites are proposed on greenfield land and would be expected to result in the permanent loss of ecologically and agriculturally important soils. However, these two sites do not coincide with any areas at risk of surface water flooding and therefore are the best preforming sites in terms of flooding.

3.17 Best performing reasonable alternative

3.17.1 Overall, a single best performing site cannot currently be identified, primarily as all sites would be likely to result in some form of negative impacts on the four SEA objectives. The close proximity of the nine sites makes identifying a best performing site across the four SEA objectives difficult. Site-specific analysis could be used to assess the biodiversity, flood risk, cultural heritage and landscape impacts of each site in more detail.

3.17.2 Further work that could be undertaken to provide more detailed environmental information could include the following. The output from these assessments would better inform future environmental assessment work.:

- Heritage impact assessments;
- Visual impact assessments;
- Landscape sensitivity assessments;
- Strategic flood risk assessment; and
- Ecological impact assessments.

4 Mitigation considerations

- 4.1.1 Recommendations for measures which would be likely to help mitigate negative impacts have been made in **Box 4.1**.
- 4.1.2 The mitigation hierarchy is a sequential process that operates in the following way: firstly, if possible, negative impacts should be avoided. Failing this, the nature of the effect should be reduced, if possible, so that it is no longer significant. If neither avoidance nor reduction is feasible, compensation measures should be considered.
- 4.1.3 It should be noted that the adoption of these mitigation recommendations does not ultimately result in the 'fix' of the adverse impact awarded to the SEA Objective. These recommendations can help reduce the severity of many adverse impacts but are unlikely to solve them entirely. These strategies should be explored in full when allocating and designing development.

Box 4.1: Mitigation Recommendations

Biodiversity and Geodiversity

Biodiversity within the Plan area relies on a coherent ecological network throughout the wider region²⁴. Retention of the ecological network within developments should be designed with the goal of maintaining and improving the habitat connectivity of the wider region. Where possible net gains for biodiversity should be sought specifically providing benefits for locally important priority habitats and species.

Total or partial loss of, and harm to, existing linear features such as hedgerows and tree lines should be avoided. This can be done by designing the development around such features on site to ensure they are not removed or damaged, or when avoidance is not possible, ensure the development design plan includes the replacement of such features, for example, additional species-rich hedgerows with trees along the site perimeter. Guidelines for species selection and conditions for screening foliage are provided by the Royal Horticultural Society²⁵.

²⁴ Lawton (2010) Making Space for Nature: A review of England's Wildlife Sites and Ecological Network. Available at:

http://webarchive.nationalarchives.gov.uk/20130402170324/http://archive.defra.gov.uk/environment/biodiversity/documents/201009space-for-nature.pdf [Date Accessed; 13/07/18]

²⁵ Royal Horticultural Society (2017) Plants for Screening. Available at: https://www.rhs.org.uk/advice/profile?PID=636

Sources of water pollution on building sites include diesel and oil, paint, solvents, cleaners and other harmful chemicals, and construction debris and dirt. When land is cleared it causes soil erosion that leads to silt-bearing run-off and sediment pollution. Silt and soil that runs into natural waterways turns them turbid, which restricts sunlight filtration and destroys aquatic life. To prevent water pollution, drains on site should be covered and all wastewater from construction sites should be collected and disposed of in accordance with environmental regulations.

The development of a Construction Environmental Management Plan (CEMP) should be used to avoid, minimise or mitigate any construction effects on the environment. Such measures should be incorporated in method statements which should identify the perceived risks to the aquatic environment, identify potential pollution pathways, and the mitigation measures to be employed which will negate the risk to any aquatic environment.

There are ten principles set out in 'Biodiversity Net Gain²⁶' report that plans mitigation to help ensure development leave biodiversity in a better state than before.

Useful resources include:

- Sustainable Build (2018) Pollution from Construction. Available at: http://www.sustainablebuild.co.uk/pollutionfromconstruction.html
- CIEEM (2016) Biodiversity New Gain: Good practice principles for development.
 Available at:
 - https://www.cieem.net/data/files/Publications/Biodiversity_Net_Gain_Principles.pdf
- Woodland Trust (2012) Urban air quality. Available at: https://www.woodlandtrust.org.uk/mediafile/100083924/Urban-air-quality-report-v4-single-pages.pdf
- J. Lawton (2010) Making Space for Nature: A review of England's Wildlife Sites and Ecological Network. Available at:

 http://webarchive.nationalarchives.gov.uk/20130402170324/http://archive.defra.gov.uk/201304021704021704021704021704021704021704021704021704021704021704021704021704
 - http://webarchive.nationalarchives.gov.uk/20130402170324/http://archive.defra.gov.uk/environment/biodiversity/documents/201009space-for-nature.pdf

Cultural Heritage

Where there is potential for development to adversely affect a heritage asset, an assessment should be undertaken to establish the extent of this potential effect as per guidelines provided by Historic England²⁷.

Where possible development should consider sensitive design around existing cultural assets and maintain the setting of such assets, including the use of screening. Screening should consist of locally important native tree and hedge species which retain year-

²⁶ CIEEM (2016) Biodiversity New Gain: Good practice principles for development. Available at: https://www.cieem.net/data/files/Publications/Biodiversity_Net_Gain_Principles.pdf

²⁷ Historic England (2015) The Setting of Heritage Assets - Historic Environment Good Practice Advice in Planning: 3. Available at: https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/

round foliage. Guidelines for species selection and conditions for screening foliage are provided by the Royal Horticultural Society²⁸.

Historic England²⁹ recommend a number of mitigation measures which include:

- Preparation of detailed historic environment policy guidance;
- Undertaking detailed historic characterisation studies to inform development; and
- Preparation of management plans for heritage assets.

It is also recommended that, where appropriate and where the opportunity exists, proposals should seek to increase the local awareness of cultural heritage assets in the local area.

Useful resources include:

- Historic England (2014) Conservation Bulletin 72: Housing. Available at: https://historicengland.org.uk/images-books/publications/conservation-bulletin-72/
- Historic England (2016) Sustainability Appraisal and Strategic Environmental
 Assessment: Advice Note 8. Available at:
 https://content.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/heag036-sustainability-appraisal-strategic-environmental-assessment.pdf/

Landscape

New developments should seek to incorporate new planting schemes or landscape buffers into the development design for screening purposes, in-keeping with the local character. Screening buffers should comprise locally important native species.

Residential dwellings should be built in accordance with the distinctive features, scale and design of the current local area and avoid coalescence. This may include the use of Cotswolds stone or buildings of one storey. However, it is not recommended that too many identical or similar housing types are developed in the same area.

In general, lower density housing developments are anticipated to have a reduced negative impact on the surrounding landscape character, therefore this is recommended.

²⁸ Royal Horticultural Society (2017) Plants for Screening. Available at: https://www.rhs.org.uk/advice/profile?PID=636

²⁹ Historic England (2016) Sustainability Appraisal and Strategic Environmental Assessment: Advice Note 8. Available at: https://content.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/heag036-sustainability-appraisal-strategic-environmental-assessment.pdf/

Useful resources include:

- Building for Life Partnership (2012) Building for Life 12: The sign of a good place to live. Available at: https://www.designcouncil.org.uk/resources/guide/building-life-12-third-edition
- Campaign to Protect Rural England (2017) What's Special to You: Landscape Issues
 in your Neighbourhood§ Plan. Available at:
 https://www.cpre.org.uk/resources/countryside/landscapes/item/4626-what-sspecial-to-you-landscape-issues-in-your-neighbourhood-plan

Natural Resources

Wherever possible development should utilise brownfield/ previously developed land and existing buildings for development.

The permeability of soil reduces as compaction increases. It is therefore recommended that construction workers adopt best practice measures to avoid the compaction of soils and exacerbating surface water flood risk during construction.

Construction workers should apply best practice in relation to sustainable management of soils during construction, as per DEFRA guidance³⁰, which could include the implementation of a Soil Resource Plan for the site, providing maps of the subsoils, methods for stripping and stockpiling soils and identifying a soil supervisor.

Opportunities to incorporate Sustainable Urban Drainage Systems (SuDS) into future development should be sought in order to increase natural infiltration rates, reduce surface water run-off, reduce flood risk and improve water quality. SuDS should be incorporated with green infrastructure where possible.

Useful resources include:

- DEFRA (2009) Construction Code of Practice for the Sustainable Use of Soils on Construction Sites. Available at: https://www.gov.uk/government/publications/code-of-practice-for-the-sustainable-use-of-soils-on-construction-sites
- WWF (2018) Saving the Earth: A Sustainable Future for Soils and Water. Available at: https://www.wwf.org.uk/sites/default/files/2018-04/WWF_Saving_The_Earth_Report_HiRes_DPS_0.pdf

³⁰ DEFRA (2009) Construction Code of Practice for the Sustainable Use of Soils on Construction Sites. Available at: https://www.gov.uk/government/publications/code-of-practice-for-the-sustainable-use-of-soils-on-construction-sites [Date Accessed: 13/07/18]

5 Conclusion

- 5.1.1 This report has assessed the reasonable alternative sites in Eckington Parish as identified in the Call for Sites report. A total of nine sites were assessed. All sites were assessed against the SEA Framework presented in the Eckington NDP Scoping Report³¹. This focusses on biodiversity and geodiversity, cultural heritage, landscape and natural resources issues within the Parish.
- 5.1.2 Appraisals of the reasonable alternatives identified major and minor negative impacts on all four of the SEA objectives.
- 5.1.3 Mitigation considerations have been provided in **Chapter 4** which would be expected to lessen the negative impacts in some cases but would be unlikely to resolve the sustainability issues completely.

³¹ Lepus Consulting (2018) Strategic Environmental Assessment of the Eckington Neighbourhood Development Plan: Scoping Report

Habitat Regulations Assessments

Sustainability Appraisals

Strategic Environmental Assessments

Landscape Character Assessments

Landscape and Visual Impact Assessments

Green Belt Reviews

Expert Witness

Ecological Impact Assessments

Habitat and Ecology Surveys



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CHELTENHAM

Appendix B: Responses to Scoping Report of Statutory Consultees



WEST MIDLANDS OFFICE

Ms Catherine Wright	Direct Dial: 0121 625 6887
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Lepus Consulting Ltd.

1 Bath Street Our ref: PL00480966

Cheltenham

GL50 1YE 12 October 2018

Dear Ms Wright

ECKINGTON NEIGHBOURHOOD PLAN- SEA SCOPING

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

We have no substantive concerns as to the contents of the document and consider the evidence base for the SEA, the identified key issues and the proposed SEA framework to be well thought out and fit for purpose. I hope this is helpful.

Yours sincerely,

Peter Boland

Historic Places Advisor

peter.boland@HistoricEngland.org.uk

CC:





Our ref: SV/2010/104075/SE-

Wychavon District Council 04/SP1-L01 Planning Policy Your ref:

Civic Centre Queen Elizabeth Drive

Pershore Worcestershire WR10 1PT **Date:** 03 October 2018

Dear Sir/Madam

Eckington Neighbourhood Development Plan (NDP) - Draft Scoping Report for consultation

Thank you for referring the above consultation, which we received on 14 September 2018.

We have reviewed the draft SEA scoping report (September 2018) and wish to provide the following comments for your consideration at this stage.

Environmental Themes

The themes presented appear to incorporate the 'SEA topics' suggested by Annex I (f) of the SEA Directive and appear reasonable to reflect the purpose of the NDP and its potential environmental effects. The themes include Biodiversity, Flood Risk, Climate change (incorporating mitigation and adaptation), Land, soil and water resources. The following comments focus on these themes relevant to our remit.

Biodiversity

We understand that you have consulted Natural England (NE) for comments and as the lead on SSSI/SAC areas, they will offer you some advice on the options to protect and enhance such designations etc.

The SEA objectives and questions for biodiversity should cover the water environment and priority species relevant to our remit (with reference to the EA/NE joint protocol on protected species) to help ensure protection and enhancement of such. Such as water voles and otters. http://jncc.defra.gov.uk/page-0

SA objective 1 could consider whether the plan will protect sites and habitats designated for nature conservation "including protected species".

Climate Change

Within Paragraph 6.3 'Key Sustainability Issues' in Box 6.3:

There should be a point which details the risk of climate change – increases in flood risk overtime, climate change adaptation etc. You may wish to refer to RTPIs recent guidance on climate change:

https://www.rtpi.org.uk/media/2852781/TCPA%20RTPI%20planning%20for%20climate%20change%20guide_final.pdf.

The National Planning Practice Guidance (NPPG) refers to Environment Agency guidance on considering climate change in planning decisions which is available online: https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances

Environment Agency

Hafren House Welshpool Road, Shelton, Shrewsbury, SY3 8BB.

Customer services line: 03708 506 506 www.gov.uk/environment-agency

Cont/d..

It should be used to help planners, developers and advisors implement the National Planning Policy Framework (NPPF)'s policies and practice guidance on flood risk. It will help inform Flood Risk Assessments (FRA's) for planning applications, local plans, neighbourhood plans and other projects.

We have produced Climate Change Guidance for our local area. This is attached for your consideration / reference.

Flood Risk

Page 40, paragraph 6.2.13 – Should refer to "all sources of flooding" include <u>groundwater</u> flooding, in line with the National Planning Policy Framework (NPPF).

The SEA should identify the need for the 'sequential test' in to aiming to facilitate new development in areas at lower risk of flooding and the sequential approach/NPPG policy aims in terms of avoiding inappropriate development in areas subject to flood risk (applications granted in flood risk areas). Avoiding flood risk could be included as an SEA objective. We note that all 3 housing allocations under 'Policy H10' (RM2, Pershore Road and JS1) are located within Flood Zone 1 with no Ordinary Watercourse through/near the sites.

The SA could also look at 'ensuring flood risk reduction/improvement to the flood regime'. For example, options to look at strategic flood risk management and reduction measures could be incorporated, for example flood storage improvements, which can often be linked to other wider environmental benefits such as wet washland provision, or biodiversity enhancement, if planned. Alternatively options to look at flood alleviation scheme improvements could be explored, although majority of the Parish is out of Flood Risk Zones.

Note - Our indicative Flood Map for Planning (Rivers and sea) does not include climate change allowances and primarily shows potential flooding from Main Rivers. In considering flood risk data, the limitations of our Flood Map should be acknowledged. We note the Council's Strategic Flood Risk Assessment (SFRA) is being reviewed and updated as part of the Local Plan review e.g. to reflect the latest climate change allowances (comments above).

Some un-modelled or ordinary watercourses have not been mapped on our Flood Map, catchments smaller than 3km^2 are not represented. Whilst the smaller catchments do not have an associated flood extent based on our flood map, this does not mean there is no flood risk associated with the watercourse. Ordinary Watercourse flood risk should be included around/in section 6.2.13 on page 40. Although we note that there are no Ordinary Watercourses located at the allocated sites.

In considering other types of flooding a reference should also be made to surface water flooding maps.

Soil (Land) and Water Resources

Within the Natural Resources section of the report, there is a reference to groundwater vulnerability, source protection zones (SPZs – which there are none with in the NDP area) and Water Framework Directive. Our current Severn River Basin Management Plan (published February 2016) is referenced within Appendix B - and we would recommend that options are considered to help deliver the environmental objectives to improve the water environment. https://www.gov.uk/government/publications/severn-river-basin-district-river-basin-management-plan.

Future development should help to facilitate the restoration of watercourses, such as deculverting of any watercourse within or on the boundary of a site, naturalising artificially engineered river bank or beds, and providing an adequate riparian corridor in meeting flood risk, linked to RBMP and WFD objectives.

Cont/d.. 2

Further groundwater vulnerability information is available in our CAMS documents. These are available at: https://www.gov.uk/government/collections/water-abstraction-licensing-strategies-cams-process we are in the process of updating our CAMS.

In considering groundwater vulnerability, we would recommend that reference be made to our 'Approach to Groundwater Protection' dated February 2018. https://www.gov.uk/government/publications/groundwater-protection-position-statements This replaces the former Policy and Practice ('GP3') guidance.

We would expect your Council to help address WFD failures through its role as planner, issuing ordinary watercourse consents and as land manager. All watercourses in the County (and UK) are duty bound to reach Good Ecological Status or Potential (GES/GEP) by 2027. It is essential that WFD is fully integrated into the Local Plan process and that all future development helps to address the issues that currently prevent the watercourse from achieving GES/GEP.

WFD data is available from our Catchment Data Explorer tool at: http://environment.data.gov.uk/catchment-planning/RiverBasinDistrict/9

We support the SEA objective 7.2.2 and agree the NDP supports the objectives set out in the South Worcester Development Plan. However we would recommend you consider the above to finalise the SEA objective – with the addition of reduction of Flood Risk, Climate Change etc.

General comments

Neighbourhood Development Plans are to be in 'general conformity' with the strategic planning polices set out in the adopted South Worcestershire Development plan (SWDP). As part of the local plan (SWDP) review relevant evidence base, including SFRA and WCS are being updated. Therefore it would be a good time to make the Council aware of issues, if any, at Eckington, so they might be considered in their updated SFRA/WCS.

I trust that the above comments and suggestions are of interest at this time.

Meeting and/or detailed document (e.g. evidence base or policy) review
If you would like to discuss your proposals further, or for us to review technical
reports/documents, outside of the formal statutory consultation, this will be chargeable
in line with our cost recovery service. Please contact me for further details.

Yours faithfully

Mr. Alex Thompson Planning Advisor

Direct dial 02030 254370 Direct e-mail alex.thompson@environment-agency.gov.uk

End 3

Date: 19 October 2018

Our ref: 258492

Your ref: Eckington NDP - Scoping Report



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Catherine Wright BSc (Hons) MSc Environmental Consultant Lepus Consulting Ltd 1 Bath Street Cheltenham GL50 1YE

BY EMAIL ONLY

catherine.wright@lepusconsulting.com

Dear Catherine

Eckington Neighbourhood Plan – Scoping report consultation

Thank you for your consultation on the above dated 14 September 2018 which was received by Natural England on 14 September 2017.

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

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

Policies, Plans and Programmes

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

Sustainability Framework

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

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

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

For clarification of any points in this letter, please contact Yana Burlachka on 02082256013. For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely

Yana Burlachka Land use planning adviser – West Midland Team

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

Natural environment information sources

The Magic¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones). Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available here².

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found here3. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

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

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

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

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the <u>Magic</u>⁵ website and also from the <u>LandIS website</u>⁶, which contains more information about obtaining soil data.

Natural environment issues to consider

The <u>National Planning Policy Framework</u>⁷ sets out national planning policy on protecting and enhancing the natural environment. <u>Planning Practice Guidance</u>⁸ sets out supporting guidance.

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

¹ http://magic.defra.gov.uk/

² http://www.nbn-nfbr.org.uk/nfbr.php

³http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/bio diversity/protectandmanage/habsandspeciesimportance.aspx

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

⁵ http://magic.defra.gov.uk/

⁶ http://www.landis.org.uk/index.cfm

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

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

Landscape

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

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

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed here⁹), such as Sites of Special Scientific Interest or Ancient woodland ¹⁰. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed here 1) or protected species. To help you do this, Natural England has produced advice here 12 to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see our publication <u>Agricultural Land Classification: protecting the best and most versatile agricultural land¹³.</u>

Improving your natural environment

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

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

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

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

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

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

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

http://publications.naturalengland.org.uk/publication/35012

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

 $[\]frac{14}{http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/$

Appendix C: SA Framework

Appendix A - Full SEA Framework

	SEA Objective	Decision making criteria	Indicators	
1 enl		Will it result in a net loss or a net gain for biodiversity?	Number of planning approvals which generate adverse	
	Biodiversity: Protect, enhance and manage the	Will it protect or enhance wildlife sites or biodiversity?	impacts on sites of biodiversity importance.Creation of new biodiversity assets.	
	flora, fauna and biodiversity assets of Eckington.	Will it protect sites and habitats designated for nature conservation including protected species?	 Percentage of major development generating overall biodiversity enhancement. Impact Risk Zones. 	
		Will it protect and enhance the water environment?	, p. 30. 1.00. 20.100.	
	Cultural heritage: Protect,	Will it preserve buildings of historic interest and, where necessary, encourage their conservation?	Number of Listed Buildings at risk.	
heritage asse designated a designated, a	enhance and manage heritage assets, including designated and non-	Will it preserve or enhance archaeological sites?	Number of Scheduled Monuments at risk.Annual number of visitors to historic attractions.	
	designated and non- designated, as well as features and areas of and	Will it improve the local accessibility, understanding or enjoyment of the historic environment?	 Quantity of development within the Eckington Conservation Area. 	
	heritage importance.	Will it preserve or enhance the setting or character of cultural heritage assets or areas?	Below ground remains.	
7	Landscape: Conserve, enhance and manage the character and appearance of the landscape and townscape, maintaining and strengthening their distinctiveness.	Protect and enhance the local landscape?	 Use of locally sourced materials. Is development in-keeping with surroundings? Alterations to the urban / rural fringe. 	
towr		Protect and enhance the local townscape?	 Increase of coalescence. Amount of new development in the AONB. 	
	Natural Resources: Protect, enhance and ensure the efficient use of Eckington's land, soils and water.	Impact on demand capacity of local water sources?	Book the of the fact that all the	
1		Will development avoid areas at flood risk?	Proportion of previously developed land.Likely impacts on soil fertility, structure and erosion.	
		Increase the number of residents at risk of flooding?	Agricultural Land Classification.Water quality of county's main watercourses	
		Increase the risk of flooding?	Contamination via surface water.	
		Will it ensure flood risk reduction or improvement to the flood regime?	 EA Flood Map for Planning. Surface water flood risk. Presence or loss of green infrastructure. 	
		Result in the loss of local soils?	5	

Ecological Services

Green Infrastructure

Landscape and Visual Impact Assessment

Landscape Character Assessment

Habitats Regulations Assessment

Strategic Environmental Assessment

Sustainability Appraisal



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