

Honeybourne Neighbourhood Plan

Strategic Environmental
Assessment (SEA) and Habitats
Regulations Assessment (HRA)
Screening Opinion



March 2019

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1. INTRODUCTION

1.1 BACKGROUND

This screening report is designed to determine whether or not the content of the draft Honeybourne Neighbourhood Plan requires a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004.

Whether a Neighbourhood Plan requires a SEA, and if so the level of detail needed, will depend on what is proposed in the draft Neighbourhood Plan. The National Planning Practice Guidance (NPPG) states that a SEA may be required, for example, where:

- the Neighbourhood Plan allocates sites for development;
- the Neighbourhood Plan Area contains sensitive natural or heritage assets that may be affected by the proposals in the plan;
- the Neighbourhood Plan may have significant environmental effects that have not already been considered and dealt with through the SEA of the Local Plan in the area.

The screening report also examines the potential impact of the draft Honeybourne Neighbourhood Plan on internationally designated wildlife sites and determines if the plan requires a Habitats Regulations Assessment (HRA).

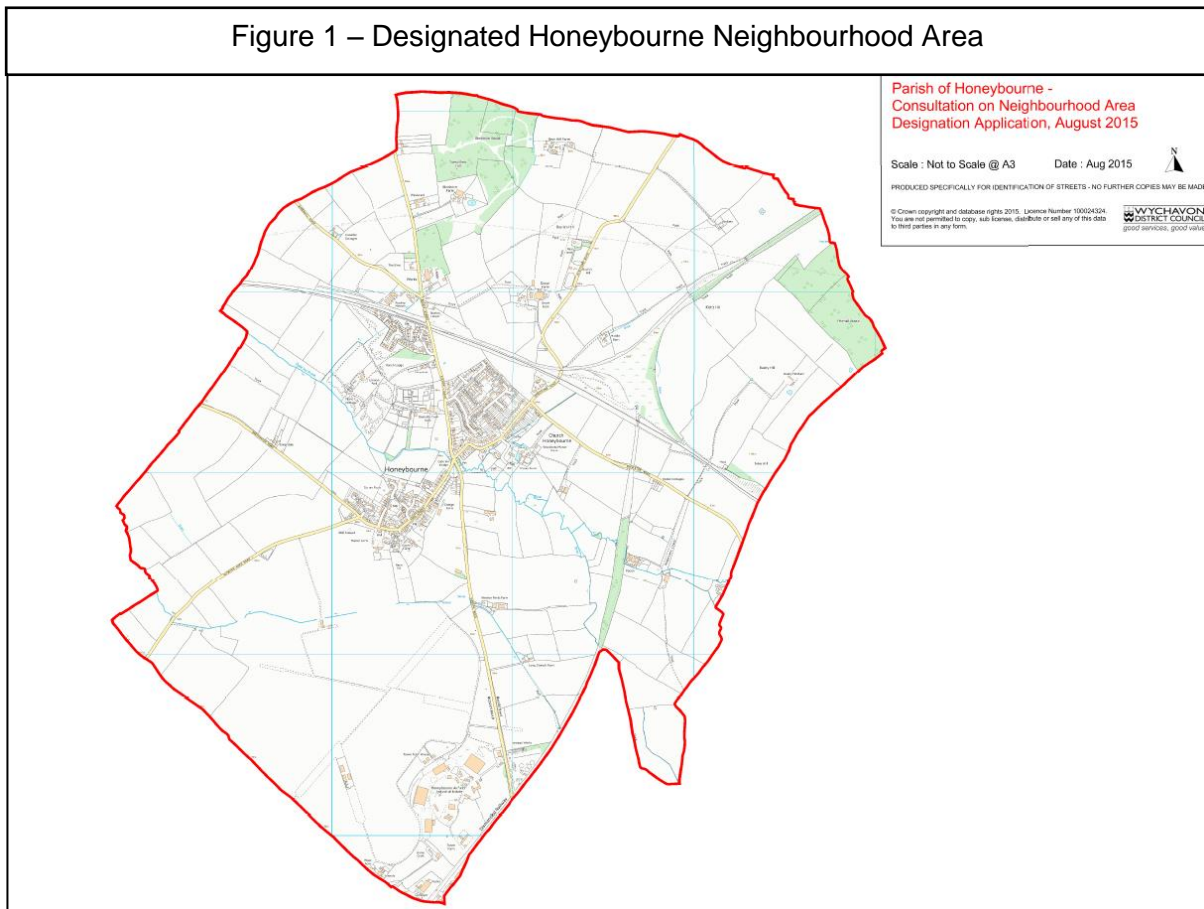
When deciding on whether the proposals are likely to have significant effects, the local authority is required to consult Historic England, Natural England and the Environment Agency. Where the local planning authority determines that the plan is unlikely to have significant environmental effects (and, accordingly, does not require an environmental assessment) it should prepare a statement of its reasons for the determination.

1.2 DRAFT HONEYBOURNE NEIGHBOURHOOD PLAN SUMMARY

The Honeybourne Neighbourhood Plan is essentially a community-led framework for guiding future development and growth of the parish to the year 2030. Thirteen draft policies have been proposed, focusing on topics including the housing, design, the natural environment, flooding and community facilities.

1.3 HONEYBOURNE DESIGNATED NEIGHBOURHOOD AREA

Figure 1 – Designated Honeybourne Neighbourhood Area



1.4 DRAFT HONEYBOURNE NEIGHBOURHOOD PLAN POLICY SUMMARIES

Thirteen policies are proposed in the draft Honeybourne Neighbourhood Plan (HNP); they are summarised below.

DRAFT POLICY	SUMMARY
H1 Site to the Rear of Harvard Avenue behind Badham's Garage	Policy H1 allocates land at Harvard Avenue for the development of approximately 50 dwellings subject to the listed criteria, which includes: delivery no earlier than 2024, the provision of an attenuation pond, vehicular access off Stratford Road, the provision of 40% Green Infrastructure, and the retention of existing native hedgerow and tree planting.
H2 Housing Mix	Policy H2 requires residential developments of five or more dwellings to provide a mix of units which reflect the local needs.
H3 House types to meet the needs of our community	Policy H3 supports residential developments which include housing which reflects the local needs, and requires schemes of five or more dwellings to include at least 20% bungalows.
H4 General Design Principles	Policy H4 details a number of design principles which new development should consider, including on Local Character, Boundary Treatments, Landscaping, the Natural Environment, Links and Connections, and Facilities.
H5 Design Policy for New Builds	Policy H5 details a number of design principles for new build development, including on Siting and Layout, Detailed Design and Materials, and Ridge Height.
H6 Housing Design Policy - Extensions	Policy H6 details a number of design criteria for consideration of building extensions, including on visual appearance and safeguarding neighbourhood amenity.
H7 Local Green Space	Policy H7 identifies 12 Local Green Spaces, development on which will not be supported unless exceptional circumstances can be demonstrated.
H8 Protecting the Landscape	Policy H8 supports measures to maintain and reinforce the natural environment and landscape character, requiring new development to have regard to conserving or enhancing the natural beauty and amenity of the area, including, where appropriate, the heritage of the Conservation Area.
H9 Trees and Hedges	Policy H9 requires development to retain and protect important trees and hedgerows and incorporate the planting of appropriate native trees and hedges.

DRAFT POLICY	SUMMARY
H10 Protection of the Best and Most Versatile Agricultural Land	Policy H10 seeks to protect the Best and Most Versatile Agricultural Land unless it can be demonstrated that such development is necessary.
H11 Flood Prevention and Water Management	Policy H11 requires all new development to provide a Water Management Statement, supporting the incorporation of SuDS features which show betterment in surface water run off rates.
H12 Community Facilities	Policy H12 identifies Community Facilities which are to be protected from redevelopment, supporting proposals which improve the quality or range of community facilities providing other relevant HNP policies are met.
H13 Footpaths, Cycle Paths and Bridleways	Policy H13 supports the use of CIL funding to protect, enhance and maintain the existing network of Footpaths, Cycle Paths and Bridleways. Policy H13 also requires new development to demonstrate how walking and cycling opportunities have been prioritised.

1.5 STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA) PROCESS

The basis for Strategic Environmental Assessment (SEA) legislation is European Directive 2001/42/EC which was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, or SEA Regulations. Detailed guidance on these Regulations can be found in the Government publication “A Practical Guide to the Strategic Environmental Assessment Directive” (OPDM 2005).

The SEA process aims to ensure that likely significant environmental effects arising from a Plan are identified, assessed, mitigated, communicated and monitored, and that opportunities for public involvement are provided. It enables environmental considerations to be accounted for in decision-making throughout the production of a Plan in an integrated manner.

Figure 2 sets out the screening procedure and how a plan should be assessed against the SEA Directive criteria. This outline procedure has then been applied to the draft Honeybourne Neighbourhood Plan in Table 1.

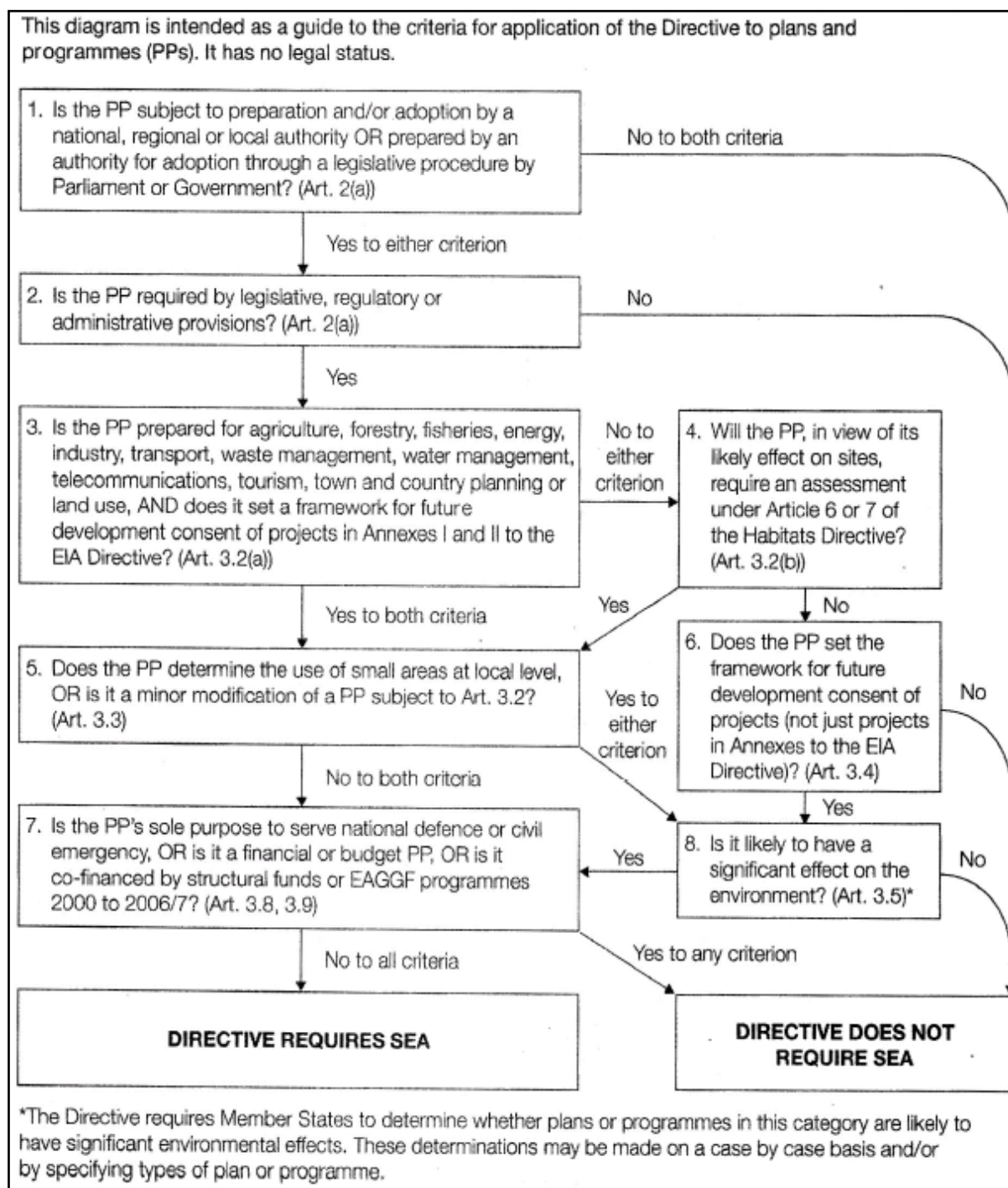


Figure 2 – Application of the SEA Directive to Plans and Programmes

Table 1: Assessment of the draft Honeybourne Neighbourhood Plan using SEA Directive Criteria

Stage	Y/N	Reason
1. Is the Honeybourne Neighbourhood Plan subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	Y	This is a Neighbourhood Plan that is being prepared by a qualifying body the Localism Act 2011. If the Plan is passed by means of an Examination and Referendum, it will be formally adopted by the Local Planning Authority. It will then form part of the local development framework and be afforded significant weight in planning decisions.
2. Is the Honeybourne Neighbourhood Plan required by legislative, regulatory or administrative provisions? (Art. 2(a))	N	Neighbourhood Plans are not mandatory requirements, and the Honeybourne Neighbourhood Plan is being prepared voluntarily by the local qualifying body in line with the provisions of the Localism Act. If the Plan is adopted however it will form part of the statutory development plan, and it is therefore considered necessary to answer the following questions to determine if an SEA is required.
3. Is the Honeybourne Neighbourhood Plan prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))	Y	The Plan is prepared for town and country planning and sets out a framework for future development consent of projects, including the allocation of a specific area of land for development.
4. Will the Honeybourne Neighbourhood Plan, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))	N	See Screening Opinion for HRA in Section 3 of this report.
5. Does the Honeybourne Neighbourhood Plan determine the use of small areas at local level,	Y	The Honeybourne Neighbourhood Plan is made up of a number of policies which, when adopted, will form part of the Local

OR is it a minor modification of a PP subject to Art. 3.2? (Art. 3.3)		Development Framework and so will have significant weight in planning decisions.
6. Does the Honeybourne Neighbourhood Plan set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3.4)	Y	When adopted, the Honeybourne Neighbourhood Plan will be a statutory planning document. It will form part of the Local Development Framework and so will have significant weight in planning decisions. The responsibility for issuing development consent will remain with the Local Authority.
7. Is the Honeybourne Neighbourhood Plan's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art 3.8, 3.9)	N	Not Applicable
8. Is it likely to have a significant effect on the environment? (Art. 3.5)	?	The Honeybourne Neighbourhood Plan may have a significant effect on the environment. To investigate the likelihood of potential impacts further a case-by-case assessment has been conducted, the full results of which can be found in Table 2.

Based upon the initial screening carried out against the criteria in Table 1 above, the draft Honeybourne Neighbourhood Plan may have a significant effect on the environment. To explore these potential effects further, a case-by-case assessment has been conducted. The criteria used in the undertaking of such an assessment are drawn from Article 3.5 (Annex II) of the SEA directive, and the results are shown in Table 2.

1.6 HABITATS REGULATIONS ASSESSMENT (HRA) PROCESS

The Habitats Regulations Assessment (HRA) refers to the assessment required for any plan or project to assess the potential implications for European wildlife sites. The HRA therefore looks at whether the implementation of the plan or project would harm the habitats or species for which European wildlife sites are designated. The relevant European wildlife site designations are Special Protection Areas (SPAs) and Special Areas of Conservation (SACs), which together form part of the Natura 2000 network.

In addition to SPAs and SACs, Ramsar sites are also designated areas which, as a matter of government policy, are to be treated in the same way as European wildlife sites (although they are not covered by the Habitats Regulations). European wildlife sites and Ramsar sites are collectively known as internationally designated wildlife sites.

The legislation sets out a process to assess the potential implications of a plan on internationally designated wildlife sites. The first stage of this process is a screening exercise where the details of nearby internationally designated sites are assessed to see if there is the potential for the implementation of the plan to have an impact.

2. SEA SCREENING

2.1 SEA SCREENING ASSESSMENT

European Directive 2001/42/EC requires a full Strategic Environmental Assessment to be undertaken for certain types of plans and programmes that would have a significant environmental effect.

Table 2 below provides the screening determination of the need to carry out a full Strategic Environmental Assessment for the draft Honeybourne Neighbourhood Plan. This has been made in accordance with the Regulations and will be subject to consultation with the strategic environmental bodies before Wychavon District Council makes its determination on the necessity for a full Strategic Environmental Assessment.

Table 2 – The Environmental Assessment of Plans and Programmes Regulations 2004: Schedule 1 - Criteria for determining the likely significance of effects on the environment.

Criteria for determining the likely significance of effects (SEA Directive, Annex II)	Likely to have significant environmental effects?	Summary of significant events
1(a) the degree to which the draft Honeybourne Neighbourhood Plan sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;	?	The Honeybourne Neighbourhood Plan would, if adopted, form part of the statutory Development Plan and as such would contribute to the framework for future development consent of projects.
1(b) the degree to which the draft Honeybourne Neighbourhood Plan influences other plans and programmes including those in a hierarchy;	?	The draft Honeybourne Neighbourhood Plan, when adopted, will be used alongside the South Worcestershire Development Plan (SWDP) in the determination of planning applications.
1(c) the relevance of the draft Honeybourne Neighbourhood Plan for the integration of environmental considerations in particular with a view to promoting sustainable development;	NO	The policies of the draft Honeybourne Neighbourhood Plan are not considered to have a significant impact on the integration of environmental considerations.
1(d) environmental problems relevant to the draft Honeybourne Neighbourhood Plan;	NO	The draft Honeybourne Neighbourhood Plan is more likely to promote environmental sustainability than create any environmental

Criteria for determining the likely significance of effects (SEA Directive, Annex II)	Likely to have significant environmental effects?	Summary of significant events
		problems.
1(e) the relevance of the draft Honeybourne Neighbourhood Plan for the implementation of community legislation on the environment (for example, plans and programmes linked to waste management and water protection);	NO	The policies of the draft Honeybourne Neighbourhood Plan are not considered to be relevant to the implementation of EC legislation.
2(a) the probability, duration, frequency and reversibility of the draft Honeybourne Neighbourhood Plan;	NO	It is considered unlikely that there will be any irreversible damaging environmental impacts associated with the draft Honeybourne Neighbourhood Plan. The plan features policies which seek to protect and enhance the natural and built environment, and the plan is therefore likely to result in beneficial rather than damaging effects.
2(b) the cumulative nature of the effects of the draft Honeybourne Neighbourhood Plan;	NO	The policies of the draft Honeybourne Neighbourhood Plan are unlikely to have any significant cumulative negative environmental impacts.
2(c) the transboundary nature of effects of the draft Honeybourne Neighbourhood Plan;	NO	The draft Honeybourne Neighbourhood Plan is unlikely to have any significant negative environmental impacts on adjoining Parishes.
2(d) the risks to human health or the environment (for example, due to accidents) due to the draft Honeybourne Neighbourhood Plan;	NO	It is considered that there will be no risk to human health or the environment as a result of the draft Honeybourne Neighbourhood Plan.
2(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);	NO	The policies of the Neighbourhood Plan apply to the entirety of Honeybourne parish, and are unlikely to significantly affect areas beyond the Neighbourhood Area

Criteria for determining the likely significance of effects (SEA Directive, Annex II)	Likely to have significant environmental effects?	Summary of significant events
		boundary.
<p>2(f) the value and vulnerability of the area likely to be affected due to:</p> <ul style="list-style-type: none"> (i) special natural characteristics or cultural heritage; (ii) exceeded environmental quality standards or limit values; or (iii) intensive land-use; and 	NO	The draft Honeybourne Neighbourhood Plan will not have any substantial impact on these factors.
2(g) the effects on areas or landscapes which have a recognised national, community or international protection status.	NO	The policies of the draft Honeybourne Neighbourhood Plan are unlikely to have a negative impact on any environmental designations in the Neighbourhood Area.

2.2 SEA SCREENING OPINION

The assessment shown in Table 1 above identifies some potential significant negative effects arising from the draft Honeybourne Neighbourhood Plan, on that basis that the draft Honeybourne Neighbourhood Plan allocates land for development over and above that in the SWDP, and as such it is considered that it may require a full SEA to be undertaken.

3. HRA SCREENING

3.1 HRA SCREENING ASSESSMENT

There are no internationally designated wildlife sites within the Honeybourne Neighbourhood Area. For the purposes of this screening assessment, sites that fall within a 20km radius are also considered. There is one sites identified within this range – Bredon Hill SAC which is approximately 14km south-west of the Honeybourne Neighbourhood Area.

Bredon Hill SAC is an area of pasture woodland and ancient parkland situated approximately 4.5km south-west of Evesham. The site provides habitat for the Violet Click Beetle *Limonicus Violaceus*, which develops in the decaying wood either of very large, old hollow beech trees (Windsor Forest) or ash trees (Worcestershire and Gloucestershire border sites). Currently the key site attributes which Natural England understands the species to require is related to the abundance and condition of the ancient trees on the designated site within which it develops.

The potential impact of development on Bredon Hill SAC was examined by a full HRA as part of the production of the South Worcestershire Development Plan (SWDP). The HRA screening of the SWDP concluded that there was uncertainty with regard to the potential for significant effects on two sites as a result of increased disturbance, in particular due to increased recreational activity. Concerns were raised specifically relating to the Lyppard Grange SAC and the potential impact of proposed development on water levels and quality.

As a result of the concerns raised, a full Appropriate Assessment (AA) was conducted (this can be viewed on the SWDP website – <http://www.swdevelopmentplan.org/>). The AA concluded that the policies of the SWDP (including land allocations) were not likely to have adverse effects on the integrity of Bredon Hill SAC. In addressing concerns relating to possible increased disturbance at the SACs, it was concluded that the location of the sites in relation to proposed developments and also the availability of more suitable areas of open space for recreation in close proximity would keep potential impacts to a minimum. It was also considered that the policies of the SWDP would sufficiently mitigate the potential impact of proposed developments on the water environment, leading to minimal effect on the SAC sites.

The policies in the draft Honeybourne Neighbourhood Plan are considered to be in general conformity with the SWDP, and although the draft Plan does propose an additional land allocation over and above that in the SWDP, the scale of such allocation is considered small enough not to have an impact on any internationally designated wildlife sites. With this and the SWDP AA in mind, it can be considered that the draft Honeybourne Neighbourhood Plan will have no negative impact on internationally designated wildlife sites.

3.2 HRA SCREENING OPINION

As a result of the above assessment, it is considered that the policies of the draft Honeybourne Neighbourhood Plan are in general conformity with those contained in the SWDP. Although the draft Honeybourne Neighbourhood Plan does deviate from the land

allocations contained within the SWDP, the level of such allocation is considered small enough not to have an impact on internationally designated wildlife sites. It is therefore concluded that the draft Honeybourne Neighbourhood Plan is unlikely to have a negative impact on any internationally designated wildlife sites and as such, the recommendation is made that a full AA is not required.

4. CONCLUSIONS

The preceding assessment exercises have examined whether the draft Honeybourne Neighbourhood Plan is likely to require a full Strategic Environmental Assessment or a Habitats Regulation Assessment Appropriate Assessment.

The SEA screening exercise featured in Section 2 concludes that the draft Honeybourne Neighbourhood Plan may require a full Strategic Environmental Assessment to be undertaken. This is because the Neighbourhood Plan deviates from the land allocations for development made in the SWDP.

The HRA screening exercise featured in Section 3 concludes that the draft Honeybourne Neighbourhood Plan does not require a full Habitats Regulation Assessment Appropriate Assessment to be undertaken. There are no internationally designated wildlife sites within the Honeybourne Neighbourhood Area, with only Bredon Hill SAC falling within a 20km radius. The impact on this site as a result of the land allocations contained within the SWDP has been assessed in the SWDP HRA AA, and although the draft Honeybourne Neighbourhood Plan does deviate, the level of such allocations are considered small enough to conclude that it is unlikely to have a negative impact on any internationally designated wildlife sites and as such, the recommendation is made that a full AA is not required.

Both of the above mentioned recommendations are subject to consultation with the statutory environmental bodies (i.e. Natural England, Historic England and Environment Agency) before a formal decision is made on the requirement of a full SEA and HRA AA.

The five week consultation period runs from Tuesday 19 March to 5pm Wednesday 24 April 2019, with a determination made on the requirement of a full SEA and HRA AA thereafter.

Brodie Planning Consultants
Stable One
Manor Farm Courtyard
Southam Lane
Southam
Cheltenham
Gloucestershire
GL52 3PB

Our ref: SV/2018/110042/OT-
01/PO1-L01
Your ref:

Date: 11 April 2019

F.A.O: Rebecca Burrridge

Dear Madam

**Honeybourne Parish Neighbourhood Development Plan – Consultation Draft.
Regulation 14 Statutory Consultation 1 March until 12 April 2019**

Thank you for referring the above consultation on the Honeybourne Parish Neighbourhood Development Plan (NDP).

In addition to the above we are also in receipt of a Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) Screening Opinion request from Wychavon District Council.

We would offer the following comments in response to both consultations:

Strategic Environmental Assessment:

The European Union directive 2001/42/EC requires a SEA to be undertaken for certain types of plans and programmes that would have 'significant' environmental effect(s). Furthermore paragraph: 046 in the Flood Risk and Coastal Change section of the National Planning Practice Guidance (NPPG) (Reference ID: 11-046-20150209) states "*a strategic environmental assessment may be required, for example, where:*

- *a neighbourhood plan allocates sites for development*
- *the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan*
- *the neighbourhood plan is likely to have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan*".

To assist your Council's determination of the SEA Screening opinion and in consideration of the matters within our remit, the Neighbourhood Plan is considered unlikely to have significant environmental impacts.

Habitats Regulation Assessment:

Article 6(3) of the European Habitats Directive (1992) requires that any plan (or project), which is not directly connected with or necessary to the management of a European site

Environment Agency
Newtown Industrial Estate (Riversmeet House) Northway Lane, Tewkesbury, Gloucestershire, GL20 8JG.
Customer services line [REDACTED]
www.gov.uk/environment-agency

Cont/d..

(also known as a “Natura 2000” site), but would be likely to have a significant effect on such a site, either individually or in combination with other plans or projects, shall be subject to an ‘appropriate assessment’ of its implications for the European site in view of the site’s conservation objectives.

Based on records there are no internationally designated wildlife sites located within the Honeybourne Parish Neighbourhood Plan Area or within a 20km radius.

To assist your Council's determination of the HRA Screening opinion and in consideration of the matters within our remit, the Neighbourhood Plan is considered unlikely to have significant effects on any European designated sites.

Going Forwards

We sent Wychavon District Council a copy of our Neighbourhood Plan pro-forma guidance for distribution to Parish Councils (as enclosed). The purpose of the guidance is to assist the preparation of Neighbourhood Development Plans, including an appropriate evidence base. This includes consideration of some of the relevant environmental issues that should be considered, including flood risk (from rivers and sea), water quality, water resources and includes latest Climate Change recommendations for flood risk.

We note the draft NDP includes one site allocation (Policy H1), we recommend completing the pro-forma to check the environmental constraints. This will help collect evidence, identify challenges, inform policy and assist delivery of sustainable solutions.

We would only make substantive further comments if the Plan was seeking to allocate sites for development in Flood Zones 3 and/or 2 (the latter being used as the 1% climate change extent). Based on our Flood Map for Planning (Rivers and Sea) Policy H1 appears to be located entirely within Flood Zone 1 (low risk). Furthermore, we do not offer detailed bespoke advice on policy but advise you ensure conformity with the South Worcestershire Development Plan and refer to our guidance. This might assist with your consideration of a local environmental enhancements or improvement policies that may be necessary.

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

Yours faithfully

Mrs Tessa Jones
Senior Planning Advisor

Direct dial [REDACTED]

Direct e-mail [REDACTED]

Cc Reiss Sadley (Planning Officer (Policy) Wychavon District Council)



Historic England

Mr Reiss Sadler
Wychavon District Council
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Persnore
Worcestershire
WR10 1PT

Direct Dial: [REDACTED]

Our ref: PL00562482

9 April 2019

Dear Mr Sadler

HONEYBOURNE NEIGHBOURHOOD PLAN- SEA AND HRA SCREENING

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

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

Our comments are based on the information supplied with the screening request. On the basis of the information supplied and in the context of the criteria set out in Schedule 1 of the Environmental Assessment Regulations [Annex II of the 'SEA' Directive], Historic England concurs with your view that the preparation of a Strategic Environmental Assessment may be required, albeit it appears that no designated heritage assets are affected by the housing site allocation proposed. Beyond this, no information is supplied that would allow a judgement to be made in respect of potential impacts upon more locally significant heritage assets including potential archaeological remains. In this respect we advise that further information is sought from your own in house archaeological adviser and in particular the Worcestershire Historic Environment Record (HER) may hold pertinent information and should be consulted. Regarding HRA Historic England does not disagree with your conclusions but would defer to the opinions of the other statutory consultees.

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

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

Yours sincerely,



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TF

Telephone 0121 625 6870
HistoricEngland.org.uk



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



Historic England



Peter Boland
Historic Places Advisor



CC:



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Date: 15 April 2019
Our ref: 277040
Your ref: Honeybourne SEA and HRA Screening



Reiss Sadler
Planning Officer (Policy)
Malvern Hills and Wychavon District Councils
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Crewe
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CW1 6GJ

BY EMAIL ONLY

reiss.sadler@wychavon.gov.uk

Dear Mr Sadler,

SEA and HRA Screening of Honeybourne's Neighbourhood Development Plan

Thank you for your consultation on the above dated 18th March 2019 which was received by Natural England on the same day.

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

Strategic Environmental Assessment Screening

It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests are concerned (including but not limited to statutory designated sites, landscapes and protected species, geology and soils), that there are unlikely to be significant environmental effects from the proposed plan.

We have checked our records and based on the information provided, we can confirm that in terms of the following sites the development plan proposals will not be in, adjacent to, or in close proximity so as to give rise to significant adverse effects:

- Windmill Hill Site of Special Scientific Interest (SSSI) and Broadway Hill Site of Special Scientific Interest (SSSI)
- Bredon Hill Special Area of Conservation (SAC)

We are not aware of significant populations of protected species which are likely to be affected by the policies / proposals within the plan. It remains the case, however, that the responsible authority should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected.

Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SA/SEA is necessary.

Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SEA/HRA screening stage, should the responsible authority seek

our views on the scoping or environmental report stages. This includes any third party appeal against any screening decision you may make.

Habitats Regulations Assessment Screening

Natural England welcomes the consideration given to the Habitats Regulations. We agree with the conclusion of the screening report of no likely significant effect upon the named European designated site:

- Bredon Hill Special Area of Conservation (SAC) - located approximately 14km away.

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

For any new consultations, or to provide further information on this consultation please send your correspondences to [REDACTED]

Yours sincerely

Victoria Kirkham
Consultations Team

Reiss Sadler

From: Boland, Peter [REDACTED]
Sent: 26 April 2019 10:45
To: Sadler, Reiss
Subject: RE: Honeybourne Neighbourhood Plan SEA and HRA Screening Opinion - Clarification Sought

Hello Reiss,

I had hoped that the advice was clear. It relates to the apparent lack of any analysis in the Neighbourhood Plan of the possible environmental impacts of the housing allocation. I assume that is why Wychavon also felt that SEA may be required (ie the site had not been scrutinised as a development plan allocation would have been as part of the SWDP).

Historic England can comment on our main locus, designated heritage assets and any likely impacts upon them but clearly the historic environment goes much wider than that and includes many locally recorded undesignated assets that also require consideration. Therefore, I'm suggesting that you consult your own in-house historic environment advisers and the local HER to satisfy yourselves as to whether there are likely significant effects on locally important aspects of the historic environment.

This would then fully inform the local authorities decision as to whether in this instance SEA is required.

I hope that is helpful.

Pete Boland.

[REDACTED]

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[REDACTED]

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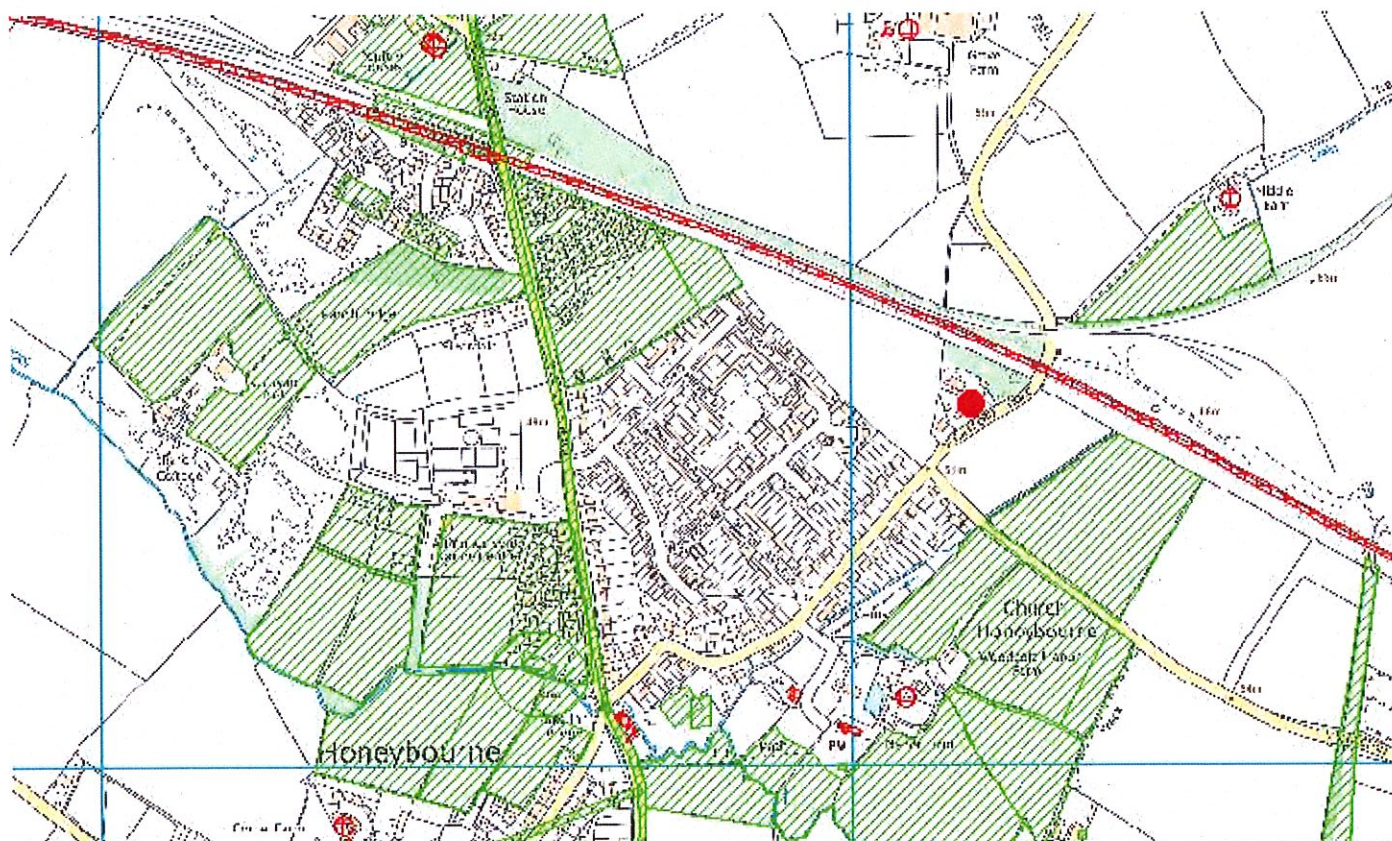
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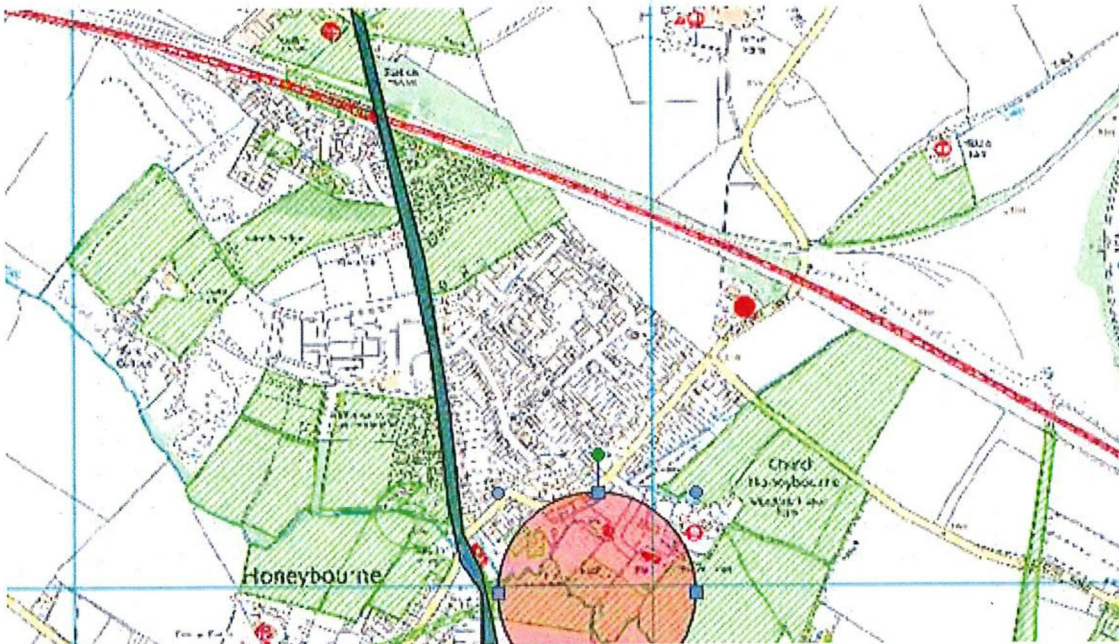
From: Smyth, Aidan
Sent: 14 May 2019 12:17
To: Sadler, Reiss
Subject: Honeybourne

Hi Reiss,

I've attached the HER map (map 1) showing known archaeological heritage assets. Most of them are ridge and furrow (R & F) which demonstrates medieval agricultural activity, however R & F can mask earlier archaeological features which are deeply stratified. Also of note is a Roman road (shown in blue) and shrunken medieval settlement (shown in red) on map 2.



Map 1



Map 2

The area outlined in your draft consultation report as 'allocated housing site' has no known archaeological features present. LiDAR data shows that prior to the introduction of the railway the field was part of a larger field system which also shows R & F within the wider field. Given the archaeological potential of the wider environs the allocated site has an archaeological potential which should be assessed prior to development. If archaeology is identified within the site archaeological mitigation will be required with a conditional program of works. It is very unlikely that any archaeology within the site will be significant enough to prevent development. The railway has truncated the field which had already been truncated by agricultural activity, therefore only deeply stratified archaeological features or remains will survive in situ.

I hope that helps, if you need anything further pop down and I'll explain the HER map in greater detail.

Kind regards,

Aidan.

Aidan Smyth
Archaeology And Planning Advisor

Wychavon and Malvern Hills District Councils

www.wychavon.gov.uk
www.malvern hills.gov.uk

Reiss Sadler

From: Smyth, Aidan
Sent: 14 May 2019 16:19
To: Sadler, Reiss
Subject: RE: Honeybourne

Hi Reiss,

Perfect.

Cheers,

Aidan.

From: Sadler, Reiss
Sent: 14 May 2019 15:13
To: Smyth, Aidan
Cc: Burgin, Jim; Ford, Andrew
Subject: RE: Honeybourne

Hi Aidan,

Thanks for your very detailed and interesting response!

I think given the site has archaeological potential which should be assessed prior to development, but any such archaeology is unlikely to prevent development, I think a Strategic Environmental Assessment is not necessary at this stage, rather archaeological works on the site prior to the granting or commencement of any such planning permission would be relevant – are you happy with that?

Regards,

Reiss

Reiss Sadler
Planning Officer (Policy)
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Tel: 01386 565 430

