

Burntwood Neighbourhood Plan

Strategic Environmental Assessment (SEA) & Habitat Regulations Assessment

Screening Report
(November 2018)

Contents

Contents.....	2
1. Introduction.....	3
2. Legislative Background.....	4
Strategic Environmental Assessment (SEA)	4
Habitat Regulation Assessment (HRA)	4
Description of the Plan or Programme	4
3. SEA Screening.....	5
Criteria for Assessing the Effects of BNDP	5
Assessment	6
Screening Outcome	12
4. HRA Screening	13
Relevant Natura 2000 sites.....	13
Screening Outcome	26
5. Conclusions and recommendations of the Screening Assessments	27
Strategic Environmental Assessment (SEA)	27
Habitat Regulations Assessment (HRA)	27
Appendix 1: Map of Natura 2000 sites within 15km of Neighbourhood Plan Boundary.....	28
Appendix 2 – HRA review of Proposed Policies in Burntwood Neighbourhood Plan	29
Appendix 3: SEA & HRA Screening Opinion and Statutory Consultee Responses	31

1. Introduction

- 1.1 This screening report is an assessment of whether or not the contents of the Burntwood Neighbourhood Plan (hereafter known as 'BNDP') 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. This screening assessment has taken place on the *Regulation 16 Submission Draft (September 2018)* as provided by Burntwood Town Council for the purposes of this screening assessment.
- 1.2 This report will also screen to determine whether the BNDP requires a Habitats Regulations Assessment (HRA) in accordance with Article 6(3) and (4) of the EU Habitats Directive and with Regulation 61 of the Conservation of Habitats and Species Regulations 2010 (as amended). A HRA is required when it is deemed that likely adverse significant effects may occur on protected European Sites (Natura 2000 sites) as a result of the implementation of a plan/project. As a general 'rule of thumb' it is identified that sites with pathways of 10-15km of the plan/project boundary should be included with a HRA. Cannock Chase Special Area of Conservation (SAC), Cannock Extension Canal SAC, Pasturefields Saltmarsh SAC, and Humber Estuary are within a 15km radius of the plan boundary. Whilst the River Mease SAC is within 15km of the BNDP boundary, the BNDP boundary is outside the water catchment area. Appendix 1 shows the Plan Boundary in relation to the 15km radius of Natura 2000 sites.
- 1.3 The purpose of the BNDP is to provide a set of statutory planning policies to guide development within the neighbourhood area over the life of the plan. The Plan provides a series of policies within seven themes/areas which it hopes will guide development. The BNDP describes the changes which should or should not take place, provides the community's views on these and, where appropriate, identifies policies which any proposed development or change should comply with for the period to 2029.
- 1.4 The legislative background set out in the following section outlines the regulations that require the need for this screening exercise. Section 3, provides a screening assessment of both the likely significant environmental effects of the BNDP and the need for SEA. Section 4, provides a screening assessment of both the likely significant effects of the implementation of the BNDP and the need for a Habitats Regulation Assessment.
- 1.5 This report will be split into two parts. The first will cover the screening for the SEA and the second will cover the screening process for the HRA. A summary of findings and conclusions for both screening processes can be found in the conclusions chapter at section 5.

2. Legislative Background

Strategic Environmental Assessment (SEA)

- 2.1 The basis for Strategic Environmental Assessments and Sustainability Appraisal legislation is European Directive 2001/42/EC and was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, or 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).
- 2.2 The Planning and Compulsory Purchase Act 2004 required Local Authorities to produce Sustainability Appraisals (SA) for all local development documents to meet the requirement of the EU Directive on SEA. It is considered best practice to incorporate requirements of the SEA Directive into an SA as discussed within the NPPF at paragraph 165. However, the 2008 Planning Act amended the requirement to undertake a Sustainability Appraisal for only development plan documents (DPD's), but did not remove the requirement to produce a Strategic Environmental Assessment. As a Neighbourhood Plan is not a development plan document it therefore does not legally require a Sustainability Appraisal. Where appropriate, however, an SEA still needs to be undertaken in line with the SEA regulations. The purpose of this report is to determine if SEA is required for the Burntwood Neighbourhood Plan.
- 2.3 The District Council is required to consult three statutory consultation bodies designated within the regulations, these are; English Heritage, Natural England and Environment Agency on whether a SEA is required, Details of the consultation bodies responses can be found at Appendix 3.

Habitat Regulation Assessment (HRA)

- 2.4 It is required by article 6 (3) of the EU Habitats Directive and by regulation 61 of the Conservation of Habitats and Species Regulations 2010 (as amended) that an appropriate assessment is carried out with regard to the Conservation Objectives of the European Sites and with reference to other plans and projects to identify if any significant effect is likely for any European Site.
- 2.5 To fulfil the legal requirements to identify if likely significant effects will occur with the implementation of the BNDP upon European Sites (Natura 2000 sites) a screening assessment has been undertaken and is set out in section 4 of this report.
- 2.6 The legislation requires where there is a "risk" of a significant effect on a European Site, either individually or in combination with other plans or projects then there will be requirement for the plan to progress from HRA screening to an Appropriate Assessment. This is known as the precautionary principle.

Description of the Plan or Programme

- 2.7 The BNDP has been prepared by the Qualifying Body (Burntwood Town Council). The Plan includes 12 Planning Policies within seven policy sections which relate to the whole of the designated Neighbourhood Area:
 - Burntwood town centre;
 - Chasetown, Swan Island, other neighbourhood centres and local shops;
 - A healthy Burntwood that retains local identities;
 - Housing;
 - Local heritage;
 - Improving accessibility; and
 - Recreation, open spaces and community facilities.

3. SEA Screening

Criteria for Assessing the Effects of BNDP

3.1 Criteria for determining the likely significant effects referred to in Article 3(5) of Directive 2001/42/EC are set out below:

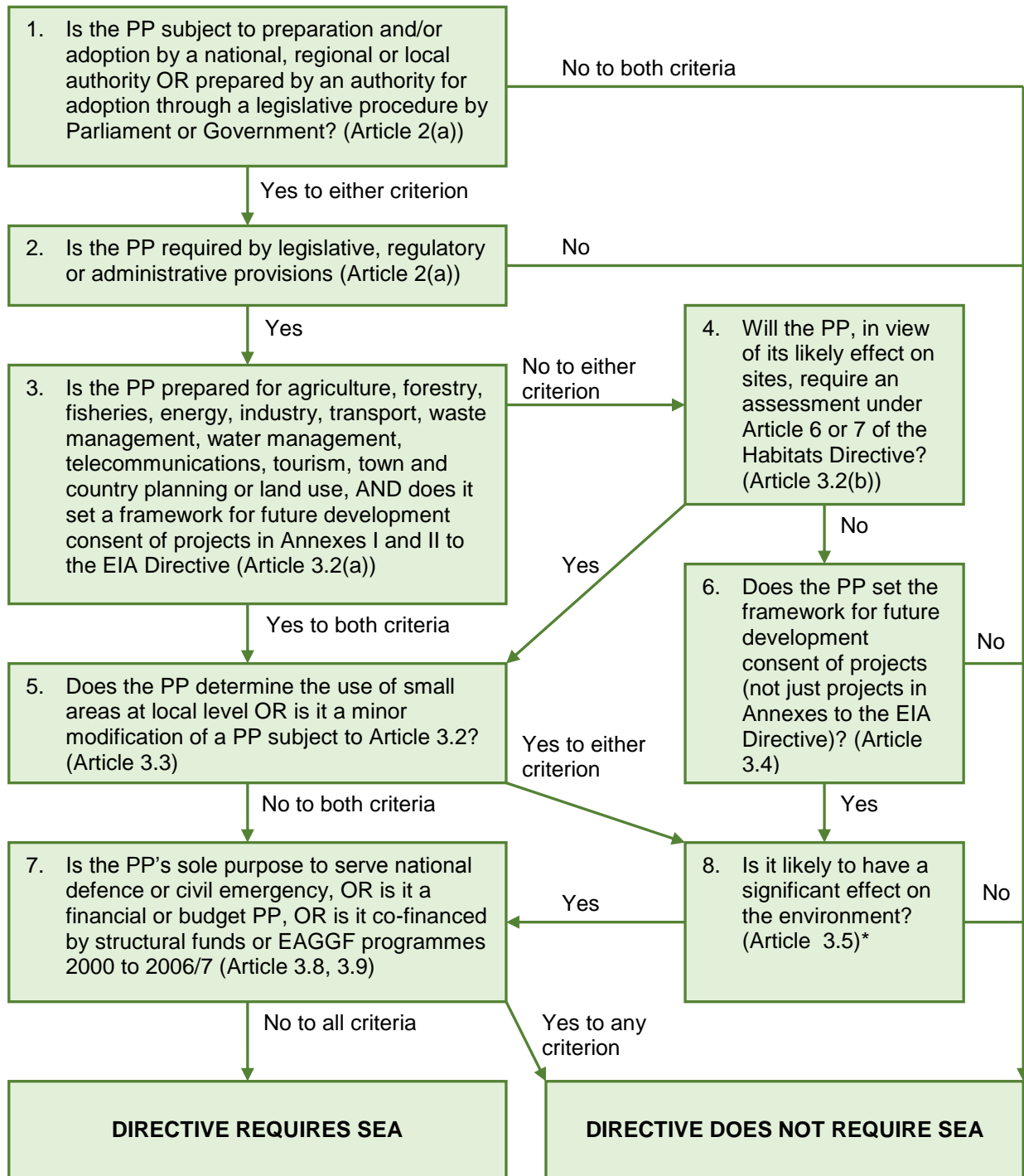
1. The characteristics of plans and programmes, having regard, in particular, to
 - the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources,
 - the degree to which 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,
 - 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).
2. 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,
 - the effects on areas or landscapes which have a recognised national, Community or international protection status.

Source: Annex II of SEA Directive
2001/42/EC

Assessment

- 3.2 It is required by the Localism Act that Neighbourhood Plans must be in general conformity with the strategic policies of the Local Plan. The development plan for Lichfield District is currently made up of the adopted Lichfield District Local Plan Strategy (LPS) which includes some saved policies from the 1998 Lichfield District Local Plan (saved September 2007). Therefore the Neighbourhood Plan must be in general conformity with these policies. The Local Plan Strategy (LPS) was subject to a full Sustainability Appraisal which included a SEA assessment. This ensured that there were no likely significant effects which would be produced from the implementation of the Local Plan and if so ensured mitigation measures were in place.
- 3.3 Guidance upon SEA's written by the Department of the Environment produces a diagram to the process for screening a planning document to ascertain whether a full SEA is required, see figure1.

Figure 1. Application of the SEA Directive to plans and programmes (PPs)



* The Directive requires Member States to determine whether plans or programmes in this category are likely to have significant environmental effects. These determinations may be made on a case by case basis and/or by specifying types of plan or programme.

3.4 The process in figure 1 has been undertaken and the findings can be viewed in Table 1. Table 1 shows the assessment of whether the BNDP will require a full SEA. The questions in table 1 are drawn from the diagram above which sets out how the SEA Directive should be applied.

Table 1: Establishing the Need for SEA

Stage	Yes/No	Reason
1. Is the PP (plan or programme) subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	Yes	This Neighbourhood Plan is prepared by Burntwood Town Council (as the Qualifying Body) under the provisions of the Town and Country Planning Act 1990 as amended by the Localism Act 2011. Once the plan is 'made' subject to examination and having received 50%+ or more 'yes' votes through a referendum it will be adopted by Lichfield District Council and become part of the Statutory Development Plan for the area.
2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))	Yes	Communities have a right to produce a Neighbourhood Plan; however communities are not required by legislative, regulatory or administrative purposes to produce a Neighbourhood Plan. However, once 'made' the BNDP would form part of the statutory development plan, and will be used when making decisions on planning applications within the Neighbourhood Area. Therefore it is considered necessary to answer the following questions to determine further if an SEA is required.
3. Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))	Yes	The BNDP is prepared for town and country planning and land use. The plan sets out a framework for future development in the Burntwood Neighbourhood Area. Once 'made' the BNDP would form part of the statutory development plan, and will be used when making decisions on planning applications which may include development which may fall under Annex I and II of the EIA directive.
4. Will the PP, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive?(Art. 3.2 (b))	Yes	The Neighbourhood Plan could potentially have an impact on internationally designated wildlife sites covered by the Habitats Regulations. See screening assessment for HRA in following section of this report.

Stage	Yes/No	Reason
5. Does the PP Determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art. 3.2? (Art.3.3)	Yes	The BNDP identifies the use of small areas at the local level, including the designation of Local Green Spaces. Once 'made' the Burntwood Neighbourhood Plan would form part of the statutory development plan and be used when making decisions on planning applications of small areas at the local level.
6. Does the PP set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3.4)	Yes	The BNDP, once the 'made', forms part of the statutory development plan and will be used to determine planning applications within the designated Burntwood Neighbourhood Area. Therefore the Neighbourhood Plan will set the framework for future developments.
7. Is the PP'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)	No	The Burntwood Neighbourhood Plan does not deal with any of these categories of plan.
8. Is it likely to have a significant effect on the environment? (Art. 3.5)	Yes	The BNDP could potentially have a significant effect on the environment not just within the neighbourhood area but also within the District. The BNDP could also impact upon Cannock Chase SAC a Natura 2000 sites, (see HRA section). For these reasons a case by case assessment of the BNP is required.

3.5 A number of the criteria above suggest that SEA of the Burntwood Neighbourhood Plan may be required. Criteria 8 of the assessment in Figure 1 and Table 1 considered that the Neighbourhood Plan may have a significant effect on the environment depending on the proposals within the plan and a case by case assessment may be made on a case by case basis. The criteria for undertaking such an assessment are drawn from Article 3(5) of the SEA Directive as set out at paragraph 3.1 of this report. Table 2 outlines the result of this assessment in relation to the BNDP.

3.6 The following assessment will consider the likelihood of the E Neighbourhood Plan (as published at the date of this report) to have

significant effects on the environment.

Table 2: Assessment if likelihood of significant effects on the environment

Criteria for determining the likely significance of effects (Annex II SEA Directive)	Summary of Significant effects
The characteristics of the plans, having regard to;	
<p>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.</p>	<p>Once 'made'; the BNDP will set out the framework which will be used to determine proposals for development within the neighbourhood area. The BNDP provides protection to the character of the area which will influence development across the plan period. There is therefore the potential for an effect on the environment resulting from the proposals in the plan.</p> <p>However the plan does not propose development in excess of that identified within the adopted Local Plan Strategy (LPS). As such the SA/SEA carried out by the District Council for the LPS could be considered sufficient.</p>
<p>The degree to which the plan or programme influences other plans or programmes including those in a hierarchy.</p>	<p>The BNDP must be in general conformity with the Lichfield District Local Plan and the National Planning Policy Framework. The Local Plan Allocations document has not yet been adopted, however the neighbourhood plan generally conforms with the emerging Local Plan Allocations document. The BNDP only provides policies for the area it covers and the Local Plan Strategy will provide the necessary strategic context when determining planning applications.</p> <p>The BNDP will help to deliver the overall aims of the Local Plan. Burntwood is identified within the Local Plan as a key settlement to take a significant proportion of growth. The Neighbourhood Plan does not propose to restrict the quantum of development which is considered to be in broad conformity with the LPS. The BNP seeks to provide further detail and support to a number of the policies within the LPS, particularly those relating to the town centre.</p>
<p>The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.</p>	<p>Any Neighbourhood Plan is required to contribute to the achievement of sustainable development and therefore the likelihood of significant effects on the environment is minimised. This plan contains policies to protect the environment and does not seek to allocate sites for development and as such the impact of the plan on the environment is minimal.</p>

Criteria for determining the likely significance of effects (Annex II SEA Directive)	Summary of Significant effects
Environmental problems relevant to the plan.	Any environmental impacts of the proposals within the ENP are unlikely to arise.
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).	The BNDP has to be in general conformity with the Local Plan. The adopted Local Plan has had regard to European Community legislation on the environment and therefore this legislation will not be relevant for the Neighbourhood Plan.
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.	Development is supported within the BNDP and therefore an element of environmental change will occur, the impacts of which will depend upon the proposals and will be subject to the policies within the LPS. The BNDP seeks to minimise the effects of development on its immediate surroundings.
The cumulative nature of the effects.	The cumulative effects of proposals within the BNDP are unlikely to be significant on the local environment given the level of development proposed does not exceed that within the adopted LPS.
The trans boundary nature of the effects.	Effects will be local with limited effects on neighbouring areas as the policies within the BNDP only apply to the designated area.
The risks to human health or the environment (e.g. due to accidents).	There is limited risk to human health or the environment as a result of the BNDP.
The magnitude spatial extent of the effects (geographical area and size of the population likely to be affected).	The scale of development proposed through the BNDP is small and does not exceed that proposed in the LPS therefore effects are likely to be localised. It is unlikely that the effects of proposals within the neighbourhood plan will be large scale and extensive.

Criteria for determining the likely significance of effects (Annex II SEA Directive)	Summary of Significant effects
<p>The value and vulnerability of the area likely to be affected due to:</p> <ul style="list-style-type: none"> - special natural characteristics or cultural heritage - exceeded environmental quality standards - intensive land use 	<p>The BNDP is likely to affect the value and vulnerability of the area in relation to the special natural characteristics or cultural heritage due to the impacts upon the Cannock Chase SAC through increasing recreational pressure on the site. However, the plan does not promote greater residential development than is set out within the LPS which includes policies to mitigate for the impacts of recreational pressure on the SAC. The BNDP and LPS policies would be used to ensure mitigation is secured.</p> <p>The level of development proposed through the ENP is unlikely to lead to intensive land use and as such not affect the value and vulnerability of the area.</p>
<p>The effects on areas or landscapes which have a recognised national, community or international protection status.</p>	<p>The Cannock Chase SAC and AONB lies within 15km of the BNDP boundary. Developments within the Cannock Chase SAC 15km zone of influence will in combination have an effect on the integrity of the SAC. The BNDP would need to be in accordance with the LPS Policy NR7 which ensures that before development is permitted it must demonstrate that it (alone or in combination) will not have an adverse effect, whether direct or indirect, upon the integrity of the SAC having regard to avoidance or mitigation measures. Chasewater SSSI is within the neighbourhood area.</p> <p>The BNDP boundary is within 15km of the Cannock Extension Canal SAC, Pasturefields Salt Marsh SAC, Humber Estuary and outside the River Mease SAC water catchment. There will be no significant effects from the proposals within the BNP on these SAC.</p>

Screening Outcome

- 3.7 The BNDP does not allocate sites for development, and does not promote more development than is set out within the LPS. The suite of policies included within the plan are not considered to restrict development or seek to propose greater development than is set out within the LPS. The plan proposes the designation of a number of Local Green Spaces.
- 3.8 The conclusions of the above screening assessment on the 'Regulation 16 Submission Draft' indicate that Strategic Environmental Assessment will not be required for the BNDP.

4. HRA Screening

- 4.1 The Habitats Regulations Assessment (HRA) refers to the assessment required for any plan or project to assess the potential impacts against the conservation objectives of Natura 2000 wildlife sites. The assessment must determine whether the plans would adversely affect, or are likely to affect, the integrity of a site(s) in terms of its nature conservation objectives. Where negative effects are identified other options should be examined to avoid any potential damaging effects.
- 4.2 Under Criteria 4 of Figure 1 and Table 1 it was concluded that the Neighbourhood Plan may have an impact upon internationally designated sites and as such a 'case by case' assessment is required.
- 4.3 The HRA process is generally divided into three stages. The initial stage of the HRA process is called the screening stage and determines if there are any likely significant effects or risk of significant effects possible as a result of the implementation of the plan. If there are significant effects the plan will need to undertake an Appropriate Assessment. The screening process should provide a description of the plan and an identification of the Natura 2000 sites which may be affected by the plan and assess the significance of any possible effects on the identified sites.
- 4.4 The Lichfield Local Plan Strategy was subject to HRA during its production. This assessment looked at all internationally designated sites which could be impacted by development within Lichfield District. [The Habitat Regulations Assessment: Lichfield District & Tamworth Borough \(May 2012\)](#) was updated by the [Addendum to Habitat Regulations Assessment \(January 2014\)](#) which concluded that the Local Plan Strategy (as modified by the proposed Main Modifications) would have no likely significant effects upon European sites. The Local Plan Allocations document has also been supported by HRA during its production and follows from the Local Plan Strategy. [The Habitat Regulations Assessment \(January 2017\)](#) and [Habitat Regulations Assessment \(January 2018\)](#) have been published alongside the allocations document.
- 4.5 This section of the report provides a "screening" assessment for the BNDP. It looks at the potential impacts of the plan's proposals on European Sites within 15km of the Neighbourhood Plan area; these sites are illustrated at Appendix 1. The following screening assessment will determine if the ENP will have any likely significant effects to determine whether the subsequent stages will be required.

Relevant Natura 2000 sites

- 4.6 The relevant Natura 2000 sites within 15km of the Burntwood Neighbourhood Area are;
- Cannock Chase SAC – approx. 4.1km to the north west;
 - Cannock Extension Canal – approx. 1.1km to the south west;
 - River Mease SAC – approx. 10.3km to the east;
 - Pasturefields Salt Marsh – approx. 14.4km to the north west;
 - and
 - Humber Estuary SAC –River Trent whose catchment is part of the Humber Estuary SAC is within the BNDP boundary.
- 4.7 The BNDP boundary is partially within the River Mease water catchment area (as illustrated at Appendix A). The River Trent whose water

catchment is part of the Humber Estuary SAC is within the BNDP boundary. Therefore the HRA screening assessment needs to identify if any likely significant effects on the reasons for these sites to be designated will be caused by the implementation of the plan. This assessment has been undertaken having regard to the results and information in the HRA and HRA addendum prepared for the Local Plan Strategy and is set out at Table 3.

Table 3: Sites within 15km of Burntwood Neighbourhood Area¹

Name of Site	Reason for Designation	Conservation Objectives	Identified Impacts
Cannock Chase SAC	<p>Annex I habitats that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> ▪ European dry heaths <p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site</p> <ul style="list-style-type: none"> ▪ Northern Atlantic wet heaths with Erica tetralix ▪ Wet heathland with cross leaved heath 	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> • The extent and distribution of qualifying natural habitats • The structure and function (including typical species) of qualifying natural habitats, and, • The supporting processes on which the qualifying natural habitats rely 	<p>Visitor pressures include dog walking, horse riding, mountain biking and off-track activities such as orienteering, all of which cause disturbance and result in erosion, new track creation and vegetation damage. Bracken invasion is significant, but is being controlled. Birch and pine scrub, much of the latter from surrounding commercial plantations, is continually invading the site and has to be controlled. High visitor usage and the fact that a significant proportion of the site is Common Land, requiring Secretary of State approval before fencing can take place, means that the reintroduction of sustainable management in the form of livestock grazing has many problems. Cannock Chase overlies coal measures which have been deep-mined. Mining fissures continue to appear across the site even though mining has ceased and this is thought to detrimentally affect site hydrology. Furthermore the underlying Sherwood Sandstone is a major aquifer with water abstracted for public and industrial uses and the effects of this on the wetland features of the Chase are not fully understood.</p>
Cannock Extension Canal SAC	<p>Annex II species that are a primary reason for selection of this site</p>	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure</p>	<p>The population of Luronium natans in this cul-de-sac canal is dependent upon a balanced level of boat traffic. If the canal is not used,</p>

¹ Extracts from the Habitat Regulations Assessment: Lichfield District & Tamworth Borough (May 2012)

	<ul style="list-style-type: none"> ▪ Floating water-plantain <i>Luronium natans</i> 	<p>that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> • The extent and distribution of habitats of qualifying species • The structure and function of the habitats of qualifying species • The supporting processes on the habitats of qualifying species rely • The populations of qualifying species, and, • The distribution of qualifying species within the site 	<p>the abundant growth of other aquatic macrophytes may shade-out the <i>Luronium natans</i> unless routinely controlled by cutting. An increase in recreational activity would be to the detriment of <i>Luronium natans</i>. Existing discharges of surface water run-off, principally from roads, cause some reduction in water quality.</p>
<p>River Mease SAC</p>	<p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site</p> <ul style="list-style-type: none"> ▪ Water courses of plain to montane levels with the <i>Ranuncion fluitantis</i> and <i>Callitricho-Batrachion</i> vegetation <p>Annex II species that are a primary reason for selection of this site</p>	<p>Maintain the river as a favourable habitat for floating formations of water Crowfoot (<i>ranunculus</i>), populations of bull head, spined loach and white clawed crayfish and the river and adjoining land as habitat for populations of otter.</p>	<p>The River Mease is an unusually semi-natural system in a largely rural landscape, dominated by intensive agriculture. Water quality and quantity are vital to the European interests, whilst competition for water resources is high. Diffuse pollution and excessive sedimentation are catchment-wide issues which have the potential to affect the site. The SSSI assessment report undertaken in 2007 notes the site's adverse condition and identifies the following issues: drainage, invasive freshwater species, water pollution – agriculture/run-off, water pollution – discharge. Significant new development could take place within the</p>

	<ul style="list-style-type: none"> ▪ Spined loach <i>Cobitis taenia</i> ▪ Bullhead <i>Cottus gobio</i> <p>Annex II species present as a qualifying feature, but not a primary reason for site selection</p> <ul style="list-style-type: none"> ▪ White-clawed (or Atlantic stream) crayfish <i>Austropotamobius pallipes</i> ▪ Otter <i>Lutra lutra</i> 		<p>catchment as a result of new housing and employment development in North-West Leicestershire, South Derbyshire and East Staffs which may impact upon water quality and quantity. The continuing creation of the National Forest will lead to further catchment wide changes in land use.</p>
<p>Pasturefields Salt Marsh SAC</p>	<p>Annex I habitats that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> • Inland salt meadows; inland saltmarshes *Priority feature 	<p>Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;</p> <ul style="list-style-type: none"> • The extent and distribution of the qualifying natural habitats • The structure and function (including typical species) of qualifying natural habitats, and • The supporting processes on which qualifying natural habitats rely 	<p>This inland saltmarsh is dependent upon traditional agricultural management, with livestock grazing and no, or minimal use, of agricultural chemicals. It is also dependent upon the brine source being maintained and whilst the hydrogeology of the site is not fully understood, it would be likely to be vulnerable to any abstractions of water from the underground aquifer. The site is managed by Staffordshire Wildlife Trust with support from Natural England's Reserve Enhancement Scheme.</p>

<p>Humber Estuary</p>	<p>Annex I habitats that are a primary reason for selection of this site</p> <ul style="list-style-type: none"> ▪ Estuaries ▪ Mudflats and sandflats not covered by seawater at low tide <p>Annex I habitats present as a qualifying feature, but not a primary reason for selection of this site</p> <ul style="list-style-type: none"> ▪ Sandbanks which are slightly covered by sea water all the time ▪ Coastal lagoons * Priority feature ▪ Salicornia and other annuals colonising mud and sand ▪ Atlantic salt meadows (Glauco- Puccinellietalia maritimae) ▪ Embryonic shifting dunes ▪ Shifting dunes along the shoreline with Ammophila arenaria (`white dunes`) ▪ Fixed dunes with herbaceous vegetation (`grey dunes`) * Priority feature 	<p>Sandbanks which are slightly covered by sea water all the time - for which the area is considered to support a significant presence.</p> <p>Estuaries, for which this is considered to be one of the best areas in the United Kingdom.</p> <p>Mudflats and sandflats not covered by seawater at low tide, of which this is considered to be one of the best areas in the United Kingdom.</p> <p>Coastal lagoons, for which the area is considered to support a significant presence.</p> <p>Salicornia and other annuals colonising mud and sand, for which the area is considered to support a significant presence.</p> <p>Atlantic salt meadows (Glauco -Puccinellietalia maritimae) for which the area is considered to support a significant presence.</p> <p>Embryonic shifting dunes, which are considered to be</p>	<p>The Humber Estuary is subject to the impacts of human activities (past and present) as well as ongoing processes such as sea level rise and climate change. Management intervention is therefore necessary to enable the estuary to recover and to secure the ecological resilience required to respond to both natural and anthropogenic change. Key issues include coastal squeeze, impacts on the sediment budget, and geomorphological structure and function of the estuary (due to sea level rise, flood defence works, dredging, and the construction, operation and maintenance of ports, pipelines and other infrastructure), changes in water quality and flows, pressure from additional built development, and damage and disturbance arising from access, recreation and other activities. Coastal squeeze is being addressed through the development and implementation of the Humber Flood Risk Management Strategy. All proposals for flood defence, development, dredging, abstractions and discharges which require consent from any statutory body, and land use plans which may have impacts upon the site are subject to assessment under the Conservation (Natural Habitats, &c.) Regulations 1994 (the "Habitats Regulations"). Diffuse pollution will be addressed through a range of measures including implementation of the Waste Water Framework Directive and Catchment Sensitive Farming initiatives.</p>
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	<ul style="list-style-type: none"> ▪ Dunes with <i>Hippophae rhamnoides</i> <p>Annex II species present as a qualifying feature, but not a primary reason for site selection</p> <ul style="list-style-type: none"> ▪ Sea lamprey <i>Petromyzon marinus</i> ▪ River lamprey <i>Lampetra fluviatilis</i> ▪ Grey seal <i>Halichoerus grypus</i> 	<p>rare as its total extent in the United Kingdom is estimated to be less than 1000 hectares, for which the area is considered to support a significant presence.</p> <p>Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ("white dunes"), for which the area is considered to support a significant presence.</p> <p>Fixed dunes with herbaceous vegetation ("grey dunes"), for which the area is considered to support a significant presence.</p> <p>Dunes with <i>Hippophae rhamnoides</i>, which is considered to be rare as its total extent in the United Kingdom is estimated to be less than 1000 hectares, for which the area is considered to support a significant presence.</p> <p><i>Petromyzon marinus</i>, for which the area is considered to support a significant presence.</p>	<p>Other issues are addressed via a range of measures including regulation of on-site land management activities and implementation of the Humber Management Scheme, developed by all relevant statutory bodies to assist in the delivery of their duties under the Habitats Regulations.</p>
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		<p>Lampetra fluviatilis for which the area is considered to support a significant presence.</p> <p>Halichoerus grypus for which the area is considered to support a significant presence.</p>	
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- 4.8 The likelihood of significant effects have been assessed in relation to the specific features and environmental conditions of the protected sites, as could be effected by the BNDP, or in combination with other known plans, taking particular account of the sites conservation objectives. As part of establishing what effects are significant, the probability of impact, duration of the impact, frequency of any impact and reversibility of impact have been considered.
- 4.9 Tables 4-8 set out the assessment based on the effects of the BNDP on the four sites detailed above.

Table 4: Cannock Chase SAC

	Direct Habitat loss	Impact on protected species	Air Quality	Water Quality	Recreational Pressures	Water Quantity	Change in Surrounding Land Use	Invasive Species
Is BNDP likely to impact upon this site	Potential	Potential	No	No	Yes	No	No	No
Possible effects in combination with other plans	The site is influenced by traffic and visitors from a wide area. Evidence has been produced which demonstrates that any new development within 15km of the SAC will, alone or in combination, have an impact upon the integrity of the SAC due to the potential for increasing visitors to the SAC.							
Assessment of effects and why not considered significant	The Burntwood Neighbourhood Area is approximately 4.1km south east of the Cannock Chase SAC. Evidence has highlighted there are vulnerabilities from recreational pressures caused predominantly by increased use from new residential development but also from other forms of development within a 15km radius of the SAC. The BNDP does not propose greater development than is set out within the Lichfield District Local Plan Strategy. The Local Plan Strategy includes policy NR7 (Cannock Chase Special Area of Conservation) which requires development to demonstrate that alone or in combination with other developments it will not have an adverse effect whether direct or indirect upon the integrity of the Cannock Chase SAC. Local Plan Policy NR7 ensures that any development within the neighbourhood area will need to demonstrate that it will not have adverse effects upon the SAC.							
Conclusion: Potential significant effects								

Table 5: Cannock Extension Canal SAC

	Direct Habitat loss	Impact on protected species	Air Quality	Water Quality	Recreational Pressures	Water Quantity	Change in Surrounding Land Use	Invasive Species
Is BNDP likely to impact upon this site	No	No	No	No	No	No	No	No
Possible effects in	None.							

combination with other plans	
Assessment of effects and why not considered significant	The Burntwood Neighbourhood area is 1.1km from the SAC. Development within the neighbourhood area would not have a direct impact upon the habitat, any protected species, air and water quality of this site nor would any policies within the plan as drafted have a direct impact upon the site.
Conclusion: No significant effects	

Table 6: River Mease SAC

	Direct Habitat loss	Impact on protected species	Air Quality	Water Quality	Recreational Pressures	Water Quantity	Change in Surrounding Land Use	Invasive Species
Is ENP likely to impact upon this site	No	No	No	No	No	No	No	No
Possible effects in combination with other plans	None. The Local Plan Strategy includes policy to ensure that development is only permitted where it can be demonstrated that there will not be an adverse effect upon the integrity of the SAC.							
Assessment of effects and why not considered significant	Whilst the River Mease SAC water catchment (as identified at appendix 1) is partially within the neighbourhood area, this is only a very small area at the very northern extent of the neighbourhood area. The neighbourhood plan does not specially propose development within this area, additionally the adopted Local Plan Strategy includes Policy NR8 (River Mease Special Area of Conservation) which ensures that development will only be permitted where it can be demonstrated that it will not lead to adverse effect on the integrity of the SAC. Due to the scale of development proposed and that this would be outside of the water catchment area of the SAC no significant effects are likely.							
Conclusion: No significant effects								

Table 7: Pasturefields Salt Marsh SAC

	Direct Habitat loss	Impact on protected species	Air Quality	Water Quality	Recreational Pressures	Water Quantity	Change in Surrounding Land Use	Invasive Species
Is ENP likely to impact upon this site	No	No	No	No	No	No	No	No
Possible effects in combination with other plans	None.							
Assessment of effects and why not considered significant	The vulnerabilities of the site are to changes in water quality and water quantity, the BNP proposes no development and no changes to water quality or water quantity will arise.							
Conclusion: No significant effects								

Table 8: Humber Estuary SAC

	Direct Habitat loss	Impact on protected species	Air Quality	Water Quality	Recreational Pressures	Water Quantity	Change in Surrounding Land Use	Invasive Species
Is ENP likely to impact upon this site	No	No	No	No	No	No	No	No
Possible effects in combination	None - The site is currently managed as a National Nature Reserve. It would be vulnerable to on site physical alterations to the water quality and quantity. There are many plans still being developed along the length of the River system.							

with other plans	
Assessment of effects and why not considered significant	Site is over 20km from the ENP boundary. Development proposals within the neighbourhood area will not affect the site physically as any effects would be through discharges into the River Tame and Trent as this eventually flows to the Humber. As the ENP does not propose more growth than the Local Plan it is unlikely this position would change.
Conclusion: No significant effects	

Screening Outcome

- 4.10 Tables 5-8 do not identify any significant effects upon the identified European sites as a result of the BNDP (as published at the date of this report). Table 4 of the screening report suggests that there are potential significant effects on the Cannock Chase SAC. The screening assessment notes the presence of Policy NR7 within the adopted Local Plan Strategy which requires development to demonstrate that alone or in combination with other developments it will not have an adverse effect whether direct or indirect upon the integrity of the Cannock Chase SAC. However, in April 2018 a judgement was handed down by the Court of Justice of the European Union which concluded that mitigation measures (such as those required by Policy NR7) cannot be taken into account when deciding on whether a plan or project is likely to have a significant effect on a European site.
- 4.11 Appendix 2 sets out a detailed assessment of the likely significant effects on European sites as a result of each policy within the BNDP. The assessment concludes that none of the policies within the BNDP are likely to have significant impacts upon the European sites identified within the assessment. Additionally:
- Whilst the HRA conclusions acknowledges the presence of additional mitigations, avoidance and cancellation measures within the Local Plan Strategy they are not required as mitigation measures of the Burntwood Neighbourhood Plan;
 - Appendix 2 provides a review on a policy by policy basis. This assessment does not identify any policies with the potential for significant effects;
 - The HRA was carried out on the precautionary principle basis; and
 - Government guidance remains that generally neighbourhood plans are unlikely to result in significant effects.
- 4.12 Following consultation with the statutory consultees on this screening report. Natural England provided a response (**Appendix 3.2**) which recommended due to the legal context the District Council as the competent authority should seek a legal opinion as to whether the neighbourhood plan would need to proceed to the further stages of Appropriate Assessment. This legal opinion was obtained and considers that the neighbourhood plan should proceed to the further stages of appropriate assessment.

5. Conclusions and recommendations of the Screening Assessments

- 5.1 This report contains the detail of the assessment of the need for the Burntwood Neighbourhood Plan to be subject to Strategic Environmental Assessment as required by the SEA Directive and Appropriate Assessment as required by the Habitats Directive.
- 5.2 The assessment of both of these requirements has been undertaken on the 'Regulation 16 Submission Draft' version of the Burntwood Neighbourhood Plan which was produced in September 2018 for the purposes of this screening assessment. As such if the content of the Neighbourhood Plan is significantly changed there may be the need for a further screening exercise to be undertaken on any modified version of the Neighbourhood Plan.

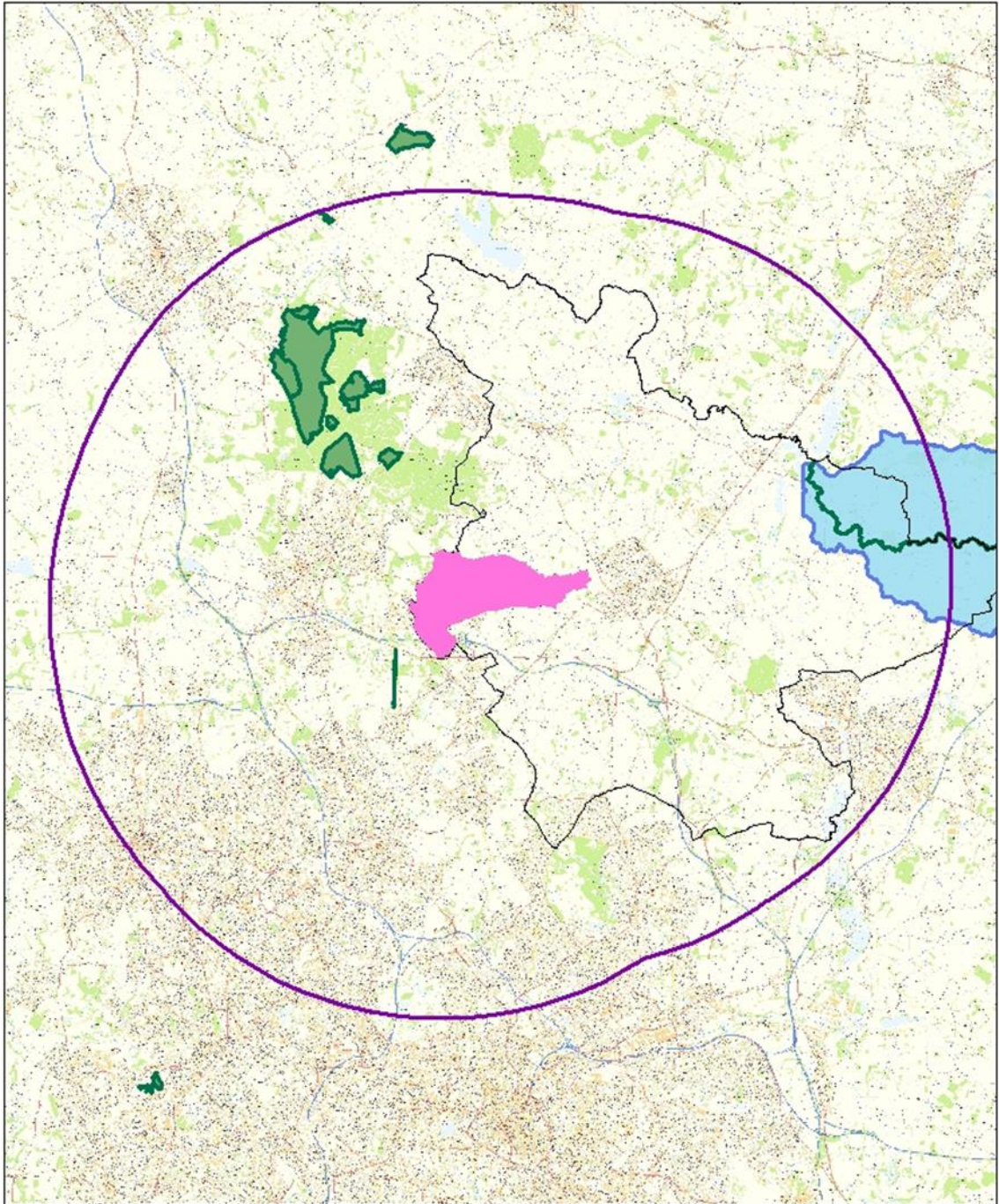
Strategic Environmental Assessment (SEA)

- 5.3 In relation to the requirement for the Burntwood Neighbourhood Plan to be subject to Strategic Environmental Assessment, the assessment detailed in Section 3 of this report concludes that as the plan in its current form is not likely to have significant environmental effects and therefore SEA will not be required. The statutory consultees indicated they agreed with the conclusions of this screening report with regard to SEA.

Habitat Regulations Assessment (HRA)

- 5.4 In relation to the requirement for the Burntwood Neighbourhood Plan to be subject to Habitat Regulations Assessment, the assessment detailed at Section 4 of this report concludes that there are no potential significant effects upon European Sites and further work as part of the compliance with the Habitat Regulations will be required. Natural England's response to this screening report recommended that the competent authority sought legal opinion with regards to the BNDP and HRA. This legal opinion recommended that the neighbourhood plan would need to be subject to further work as part of the compliance with the Habitat Regulations and that the further stages of Appropriate Assessment would need to be undertaken.

Appendix 1: Map of Natura 2000 sites within 15km of Neighbourhood Plan Boundary



Key

-  Burntwood 15km radius
-  Burntwood Neighbourhood Area
-  Lichfield District Boundary
-  Special Areas of Conservation
-  River Mease SAC Water Catchment



Appendix 2 – HRA review of Proposed Policies in Burntwood Neighbourhood Plan

BNDP Policy Number	Description of Policy	Any likely significant effects on European Sites anticipated as a result of the policy?
Policy B1: Burntwood Town Centre	Supports development within Burntwood Town Centre subject to a range of criteria.	No – The policy does not itself propose development. It provides support for proposals which are in conformity with the Local Plan.
Policy B2: Improving the environment of Burntwood centre	Supports improvements to the identified key pedestrian and road approaches to the town centre.	No – The policy does not itself propose development.
Policy B3: Chasetown, Swan Island, Ryecroft Shopping Centre and Morley Road neighbourhood centre	Supports improvements and development within identified neighbourhood centres.	No – the policy does not itself propose development.
Policy B4: Local Shops	Supports proposals which retain and/or improve local shops. Provides criteria which must be considered if proposals would lead to a loss of a local shop.	No – the policy does not itself propose development.
Policy B5: Enhancing the identity and distinctiveness of local neighbourhoods	Seeks to enhance and reinforce the distinctiveness of different neighbourhoods within Burntwood.	No – the policy does not itself propose development.
Policy B6: Promoting good quality design in new housing development	Requires new development to be of good quality design and sets a number of principles to be considered when assessing development proposals.	No – the policy does not itself propose development but includes a range of factors which would need to be considered through the planning application process.
Policy B7: Conserving and enhancing local, non- designated heritage assets	Provides support for development proposals which conserve and/or enhance non-designated heritage assets and sets out circumstances where development which	No – the policy does not itself propose development.

BNDP Policy Number	Description of Policy	Any likely significant effects on European Sites anticipated as a result of the policy?
	leads to loss of such assets would be supported.	
<i>Policy B8: Improving local accessibility outside the defined centres</i>	Requires development outside centres to improve accessibility through provision of pedestrian linkages to key facilities/centres.	No – the policy does not itself propose development.
<i>Policy B9: Protecting and enhancing local sport and recreation facilities</i>	Provides protection to identified sports and recreation facilities and supports their enhancement.	No – the policy does not itself propose development.
<i>Policy B10: Local Green Spaces</i>	Policy proposes to designate a number of Local Green Spaces within the neighbourhood area.	No – the policy does not itself propose development.
<i>Policy B11: Protected and new open spaces</i>	Provides protection for identified open spaces and support for proposals which improve the identified spaces and new open spaces.	No – the policy does not itself propose development.
<i>Policy B12: Retaining and enhancing existing community facilities</i>	Provides support for proposals which enhance a range of community facilities and provides detail of circumstances where proposals which lead to loss of such facilities would be supported.	No – the policy does not itself propose development.

Appendix 3: SEA & HRA Screening Opinion and Statutory Consultee Responses

The following appendix includes the screening opinion requests from Lichfield District Council to the Statutory Bodies (Natural England, Historic England and Environment Agency) who have been consulted through the SEA & HRA process and their responses.

- 3.1 SEA & HRA Screening Opinion Letter (03 October 2018)**
- 3.2 Natural England Response (14 November 2018)**
- 3.3 Environment Agency Response (30 October 2018)**
- 3.4 Historic England Response (23 October 2018)**

Appendix 3.1: SEA & HRA Screening Opinion Letter (03 October 2018)

Your ref Burntwood neighbourhood plan
Our ref BNP-SEA/HRA
Ask for Patrick Jervis
Email Patrick.jervis@lichfielddc.gov.uk



District Council House, Frog Lane
Lichfield, Staffordshire WS13 6YZ

Customer Services 01543 308000
Direct Line 01543 308192

03 October 2018

Dear Sir/Madam,

Burntwood neighbourhood plan – screening opinion for an SEA & HRA

Burntwood Parish Council has requested Lichfield District Council to undertake screening for SEA & HRA of the draft Burntwood Neighbourhood Plan. The District Council has undertaken a screening process and produced the attached Screening Report which concludes that SEA and HRA of the Burntwood Neighbourhood Plan (as currently drafted) will not be required.

Under the Environmental Assessment of Plans and Programmes Regulations 2004 (SI No.1633) Lichfield District Council ('the responsible authority') is required to consult with the consultation bodies in determining whether or not the plan is likely to have significant environmental effects and will therefore require an SEA. The Parish Council also requested screening opinion with regards to the need for a Habitat Regulations Assessment (HRA)

I am therefore requesting that you consider the attached Screening Report and provide any comments on its conclusions to assist in determining whether or not the plan is likely to have significant environmental effects and will therefore require an SEA. I would also welcome your comments on the need for a HRA.

If you have any comments I would ask for these to be sent within the next 21 working days (by 30 October 2017) and if you have any queries please contact myself on 01543 308196. If no reply is received by 5pm Friday 1 November 2018 it will be assumed that you concur with the conclusions of the Screening Report.

Yours faithfully,

Patrick Jervis
Principal Spatial Policy & Delivery
Spatial Policy & Delivery - Economic Growth



www.lichfielddc.gov.uk



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[lichfield_dc](https://twitter.com/lichfield_dc)



[MyStaffs App](#)

Appendix 3.2: Natural England Response (14 November 2018)

Date: 14 November 2018
Our ref: 263727
Your ref: None



Patrick Jervis
Lichfield District Council
patrick.jervis@lichfielddc.gov.uk

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

T 0300 060 3900

BY EMAIL ONLY

Dear Mr Jervis

Burntwood Neighbourhood Plan Habitats Regulations Assessment (HRA) Screening consultation

Thank you for your consultation on the above dated 03 October 2018 which was received by Natural England on the same date. I apologise for the lateness of this formal written response.

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.

Thank you for consulting us on the Habitat Regulations Assessment screening (HRA) for the Burntwood Neighbourhood Plan. The plan area is in close proximity to Cannock Chase Special Area of Conservation (SAC). Cannock Chase SAC is at risk of impacts from increasing recreation. In order to prevent impacts materialising, a mitigation package has been devised (the Strategic access management and monitoring measures (SAMMM)). As a part of this, all development within an agreed zone is required to make a financial contribution towards a suite of on-site mitigation measures. This has been written into relevant Local Plans, including the Lichfield District Local Plan through its policy NR7.

In April 2018, a judgment was handed down by the Court of Justice of the European Union ('the CJEU') which provides further authoritative interpretation of the Habitats Directive. This judgement is *People over Wind, Peter Sweetman v Coillte* ([Case C-323/17 People Over Wind v Coillte Teoranta](#)). The *People over Wind* judgment states that measures intended to avoid or reduce ... harmful effects (generally referred to as 'mitigation measures') cannot be taken into account when deciding whether a plan or project is likely to have a significant effect on a European site. Rather, a competent authority must take account of measures intended to avoid or reduce the harmful effects of a plan or project as part of the appropriate assessment. Only then can a conclusion be drawn as to whether the plan or project will have an adverse effect on the integrity of the site.

For the majority of plans and projects, this can simply mean that they proceed through the appropriate assessment stage of the HRA process, where mitigation can be taken into account and a conclusion as to whether there are adverse effects on integrity reached. However, for

Neighbourhood Plans this is not an option as there is a basic condition written into the Neighbourhood Planning (General) Regulations 2012, that the making of a neighbourhood plan is not likely to have a significant effect on a European site (paragraph 1, Schedule 2).

We note that the Burntwood Neighbourhood Plan does not allocate development. However, it does enable the delivery of houses by setting out policies governing their approximate location, form, delivery etc. The HRA Screening for the Burntwood Neighbourhood Plan reaches a conclusion of no likely significant effects. This is based on a consideration that the Local Plan and the Visitor Impact Mitigation Strategy have dealt with the issue of recreational pressure, and therefore the Neighbourhood Plan can proceed. The Lichfield District Local Plan has been well-tested and complies with *People over Wind*. The strategic solution has therefore been tested thoroughly at the plan level.

There is ongoing debate about whether when a higher tier plan has been thoroughly tested and would comply with *People over Wind*, lower tier plans and projects still require an appropriate assessment. Given the risk of procedural challenge, it is our view that in these circumstances it would be prudent to carry out an appropriate assessment of the plan or project to assess its compliance with the higher tier plan. Due to the basic condition associated with neighbourhood plans this option is not currently available to them. **We therefore advise that the council seeks its own legal advice on this matter.**

Natural England is currently considering, with the Ministry of Housing, Communities & Local Government, the particular implications of the *People over Wind* judgement for advice on neighbourhood planning. We hope to be able to offer more support and advice in the coming weeks following discussions. We recommend that this Neighbourhood Plan is put on hold and that Lichfield District Council as the competent authority seeks an update from the Ministry of Housing, Communities and Local Government.

For any queries relating to the specific advice in this letter only please contact Hayley Fleming on 020 802 60955. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Hayley Fleming
Casework Manager
Planning for a Better Environment – West Midlands Area Team

Appendix 3.3: Environment Agency Response (30 October 2018)

Patrick Jervis
Lichfield District Council
Planning Policy
PO Box 66
Lichfield
Staffordshire
WS13 6QB

Our ref: UT/2007/101798/SE-
24/SC1-L01
Your ref: Burntwood
Date: 30 October 2018

Dear Sir

Burntwood Neighbourhood Plan SEA/HRA Screening Report

Thank you for your email which was received on 03 October 2018.

As requested we have reviewed the Screening Assessment prepared in support of the Burntwood Neighbourhood Plan. Having reviewed the proposals we do not consider there to be significant environmental impacts as a result of this plan, therefore we concur with the conclusions of the report and do not require a SEA or HRA to be undertaken in support of the plan. We advise however the consultation is undertaken with Natural England amongst other statutory bodies prior to making any final decision.

We note the presence of floodplain from the Redmoor Brook and historical landfill sites within the Neighbourhood Plan boundary, however as this does not affect the settlement boundary we have no concerns.

Yours faithfully

Ms Anne-Marie McLaughlin
Planning Advisor

Direct dial 020 3025 4111

Direct e-mail anne-marie.mclaughlin@environment-agency.gov.uk

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

End

Appendix 3.4: Historic England Response (23 October 2018)



Historic England

WEST MIDLANDS OFFICE

Mr Patrick Jervis
Lichfield District Council
Spatial Policy & Delivery
District Council House
Frog Lane
Lichfield
WS13 6YZ

Direct Dial: 0121 625 6887

Our ref: PL00059362

23 October 2018

Dear Mr Jervis

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

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

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

Yours sincerely,

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



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TF

Telephone 0121 625 6870
HistoricEngland.org.uk





Historic England

WEST MIDLANDS OFFICE

CC:



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TF

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HistoricEngland.org.uk



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