



**Turvey Neighbourhood
Development Plan
Strategic Environmental Assessment
Screening Report
October 2019**



1. Introduction

- 1.1 This screening report is used to determine whether or not the content of the Turvey Neighbourhood Plan (NP) 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. These require an SEA to be undertaken for:
 - i. Plans which are prepared for town and country planning or land use and which set the framework for future development consent of projects listed in the Environmental Impact Assessment (EIA) Directive; or
 - ii. Plans which have been determined to require an assessment under the Habitats Directive.
- 1.2 Plans which determine 'the use of a small area at local level' or which only propose 'minor modification to a plan' might be exempt if they are unlikely to have significant environmental effects. NPs containing land allocations for development that are not included in the local authority's plan, are more likely to require an SEA. The main determining factor as to whether SEA is required on a NP is if it is likely to have a significant effect on the environment.
- 1.3 Section 2 of this report outlines the regulations that set the need for this screening exercise. Process and criteria of the assessment are set out in Section 3. A brief summary of the draft Turvey NP is provided in Section 4.
- 1.4 The screening assessment of the likely significant environmental effects of the NP is set out in Section 5 and the decision on the screening is provided in Section 6.

2. Legislative Background

2.1 The basis for Strategic Environmental Assessments 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.

Regulation 9 sets out the process as follows:

“Determinations of the responsible authority

9. (1) The responsible authority shall determine whether or not a plan, programme or modification of a description referred to in –

(a) paragraph (4) (a) and (b) of regulation 5;

(b) paragraph (6)(a) of that regulation; or

(c) paragraph (6) (b) of that regulation, is likely to have significant environmental effects.

(2) Before making a determination under paragraph (1) the responsible authority shall –

(a) take into account the criteria specified in Schedule 1 to these Regulations; and

(b) consult the consultation bodies

(3) Where the responsible authority determines that the plan, programme or modification is unlikely to have significant environmental effects (and, accordingly, does not require an environmental assessment), it shall prepare a statement of its reasons for the determination.

The regulations define that a responsible authority as:

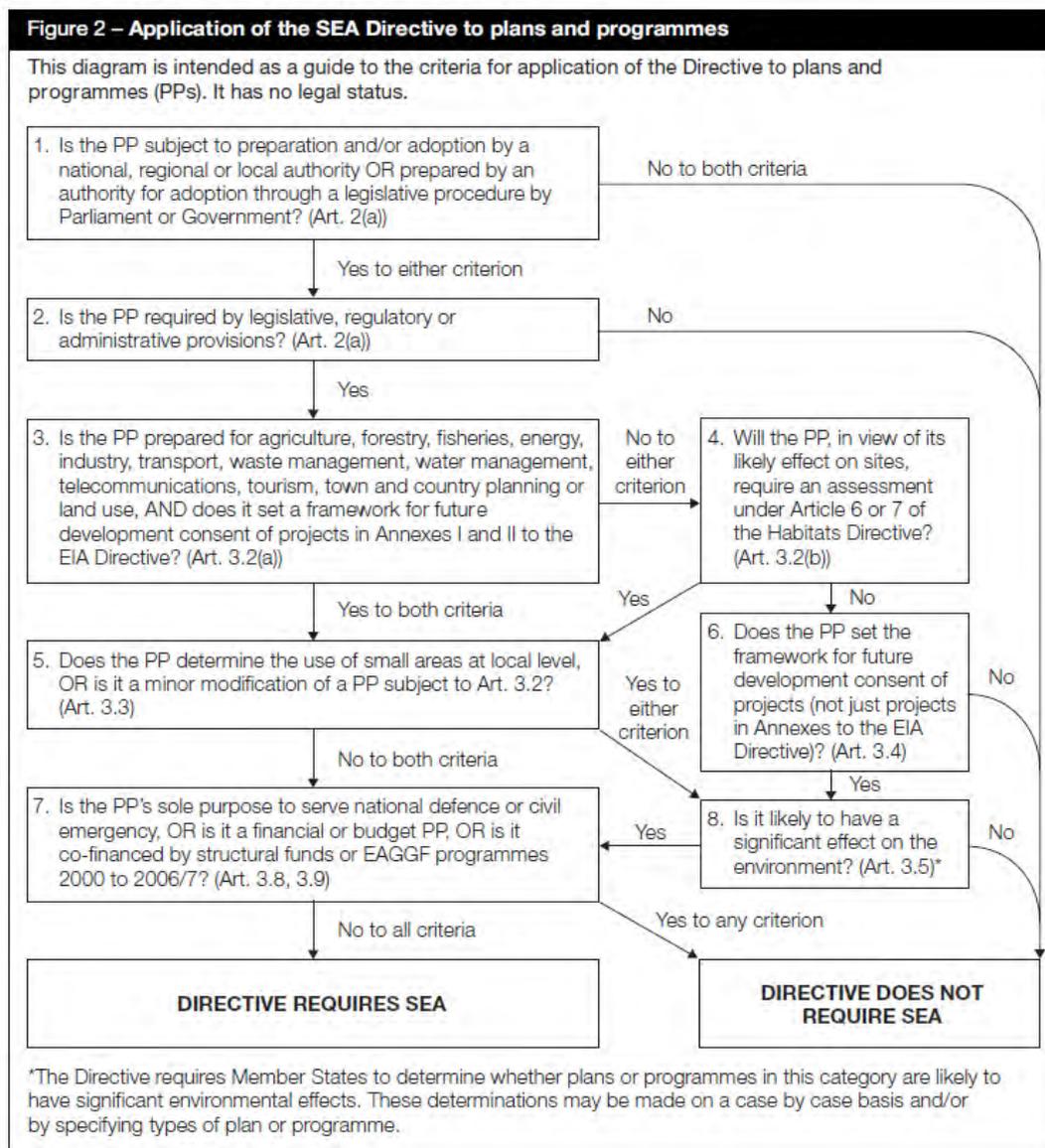
(a) the authority by which or on whose behalf it is prepared; and

(b) where, at any particular time, that authority ceases to be responsible, or solely responsible, for taking steps in relation to the plan or programme, the person who, at that time, is responsible (solely or jointly with the authority) for taking those steps;

2.2 The Government has stated that Sustainability Appraisals are not needed for Neighbourhood Plans (NPPG). It must however be demonstrated how the NP contributes to achievement of sustainable development in the area.

3. Screening assessment process

- 3.1 The screening opinion assessment is undertaken in two parts: the first part will assess whether the plan falls into a category of plans requiring SEA; and the second part of the assessment will consider whether the NP is likely to have a significant effect on the environment, using criteria drawn from Schedule 1 of the EU SEA Directive and the UK Environmental Assessment of Plans and Programmes Regulations 2004.
- 3.2 The government guidance 'A practical guide to the Strategic Environmental Assessment Directive 2005; sets out the following approach to be taken in determining whether SEA is required, shown in the figure below.



- 3.3 The criteria for determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC and Schedule 1 of The Environmental Assessment of Plans and Programmes Regulations 2004 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

- 3.4 The three statutory consultation bodies (Historic England, Environment Agency and Natural England) are to be consulted to determine whether they agree with the findings and conclusions of this screening opinion, in establishing whether the Turvey NP requires an SEA and whether it may have a significant environmental effect.

4. Summary of Neighbourhood Development Plan

- 4.1 Turvey Neighbourhood Area was designated on 19 April 2017. Following designation the Steering Group carried out consultation with the community based on a number of village surveys and exhibitions/events which involved contact with residents and interested groups.
- 4.2 This has led to the formulation of a draft plan.
- 4.3 The vision for the development of the village via the Neighbourhood Development Plan is:

“For the village to develop in a sustainable way, that accords with the wishes of those of those living in it, providing housing where needs exists whilst protecting the things we most cherish”

- 4.4 In order to deliver the vision the plan has the following aims and objectives:

A. To ensure that Turvey is a sustainable place to live, meeting the needs of the local population by:

- Providing a mixed range of new housing, to meet local need;
- Ensuring housing supports, and is supported by, a balanced range of local facilities and community infrastructure;
- Enabling and encouraging sustainable life, work and travel patterns, supported by adequate transport infrastructure.
- Ensuring that shops, pubs and community facilities are protected, and new facilities are supported where appropriate.

B. To protect, enhance and promote the character of the Parish, its historic and rural environment by:

- Conserving its distinct identity and outstanding landscape setting and natural features;
- Conserving or enhancing the historic environment and heritage assets within the village;
- Ensuring development is well designed, contributing to the distinctive sense of place and enhancing valued historic environment and landscape assets.

- 4.5 The delivery of the vision and objectives is governed by thirteen policies as follows:-

Policy T1: New Housing Growth

The Carlton Road site (see Map 3 – approx. 2ha) is allocated for housing development, subject to meeting the following development principles:

- Development must be set back from Carlton Road, behind the existing cemetery line and field and must consider the potential views to and from the Turvey House estate;
- Existing trees and tree lines within the site must be retained, with sufficient distance from built development so that tree roots are not affected;
- Landscape buffers must be provided around the periphery of the site to the west, north and east sides, to create a landscape transition and buffer to surrounding landscape areas. The buffer to the west should be to a depth of 30m;
- The existing footpath within the site must be retained and incorporated into the layout of the development.
- The footway along Carlton Road must be extended to the site

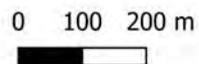
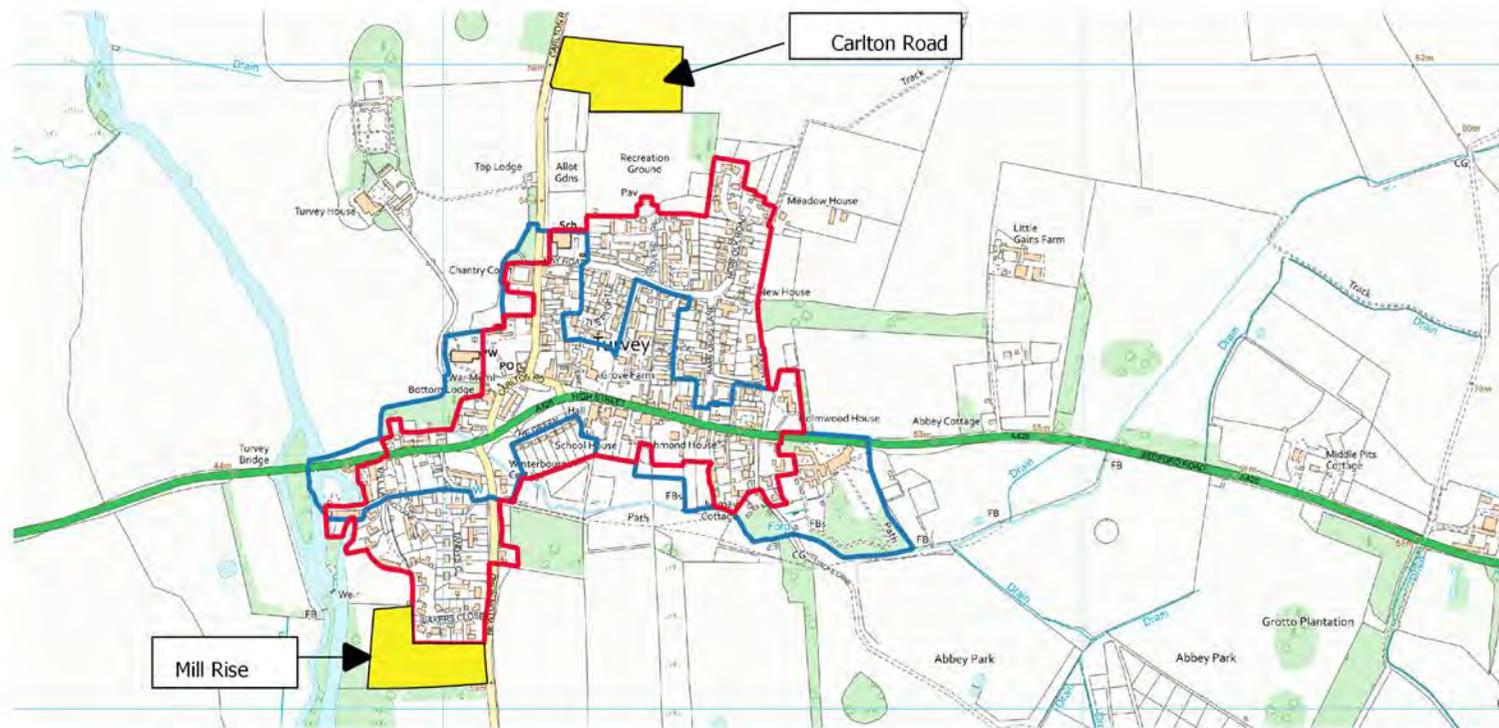
The Mill Rise site (see Map 3 – approx. 1.45ha) is allocated for housing development, subject to meeting the following development principles:

- Existing trees and tree lines around the boundary of the site must be retained, with sufficient distance from built development so that roots are not affected.
- The footway along Newton Lane must be extended to the site

Outside of these allocated sites, new housing may be supported where it would comprise:

- Development within the Settlement Policy Area;
- Infill development within an existing built frontage;
- Redevelopment of existing buildings.

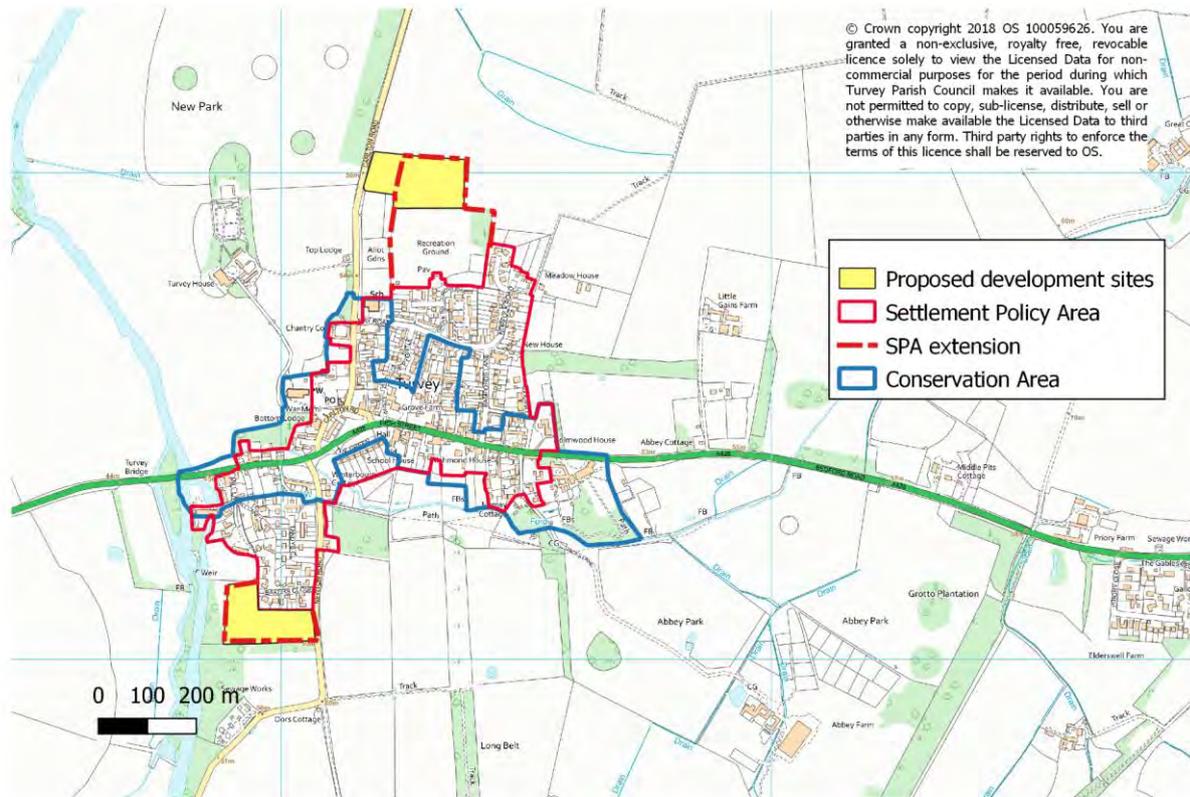
The Settlement Policy Area boundary is extended to encompass these sites, shown in Map 6.



- Proposed sites
- SPA Boundary
- Conservation Area

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Map 3 : Proposed sites at Carlton Road and Mill Rise



Map 6: Extended Settlement Policy Area

Policy T2: Housing Mix and Standards

Housing development must include a mix of sizes of accommodation, based on the most recent evidence of local need that is available. This must include smaller units (1-2 bedrooms) to cater for first time buyers and those seeking to downsize.

In considering the number of bedrooms, regard will be made to; 'Technical housing standards – nationally described space standard' (March 2015) or any standard replacing that document.

Affordable housing provision for new housing schemes must be provided as an integral part the development and be tenure-blind.

All dwellings must be supported by:

- screened and secure cycle storage;
- screened recycling and refuse bin storage.

Policy T3: Natural Environment

The open and rural setting of Turvey and the slopes of the Great Ouse Valley must be preserved. New development must have no significant adverse impact on:

- open landscape areas and the landscape setting of the river;
- the character of rural roads and lanes;
- wildlife and biodiversity;
- trees and hedgerows;
- the Registered Parkland and Garden at Turvey House and the Parkland at Turvey Abbey.

This includes consideration of the impact of lighting within development and visual impacts of development flanking landscape areas or visible from them.

The quality of water in the River Great Ouse must not be compromised by new development in order to protect Natura 2000 sites downstream of Turvey.

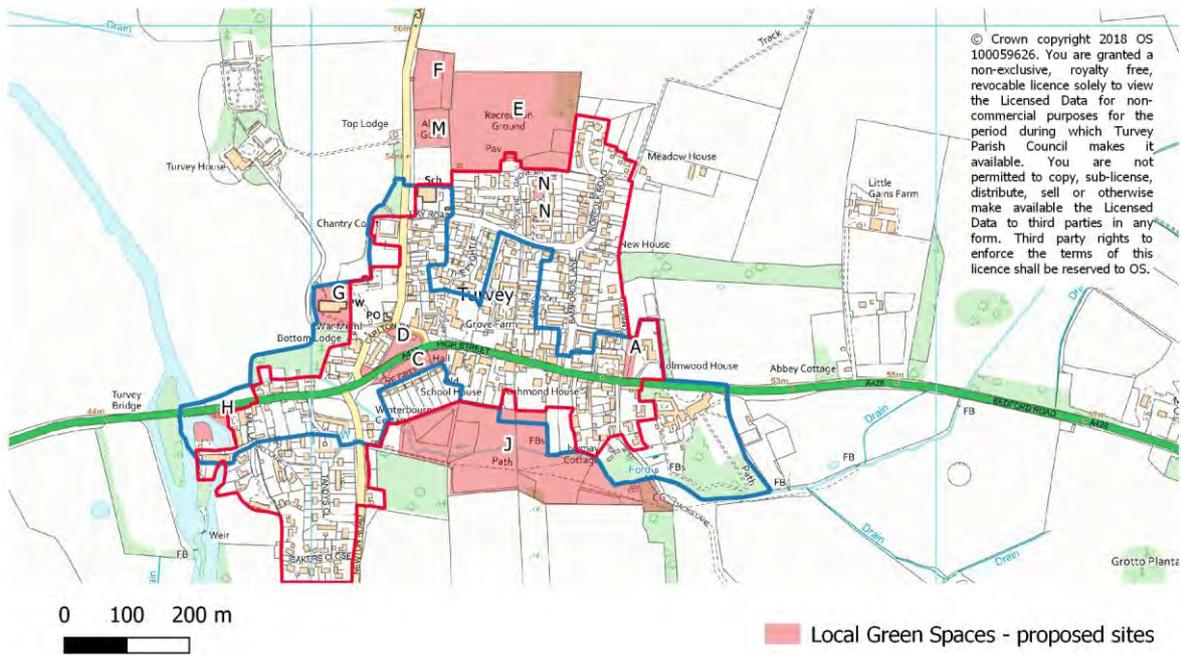
Where loss of trees and hedgerows is unavoidable, replacement trees and hedgerows should be provided, comprising native species.

Particular encouragement is given to development that includes measures to enhance wildlife and biodiversity, including houses that include bird and bat boxes in the brickwork where appropriate.

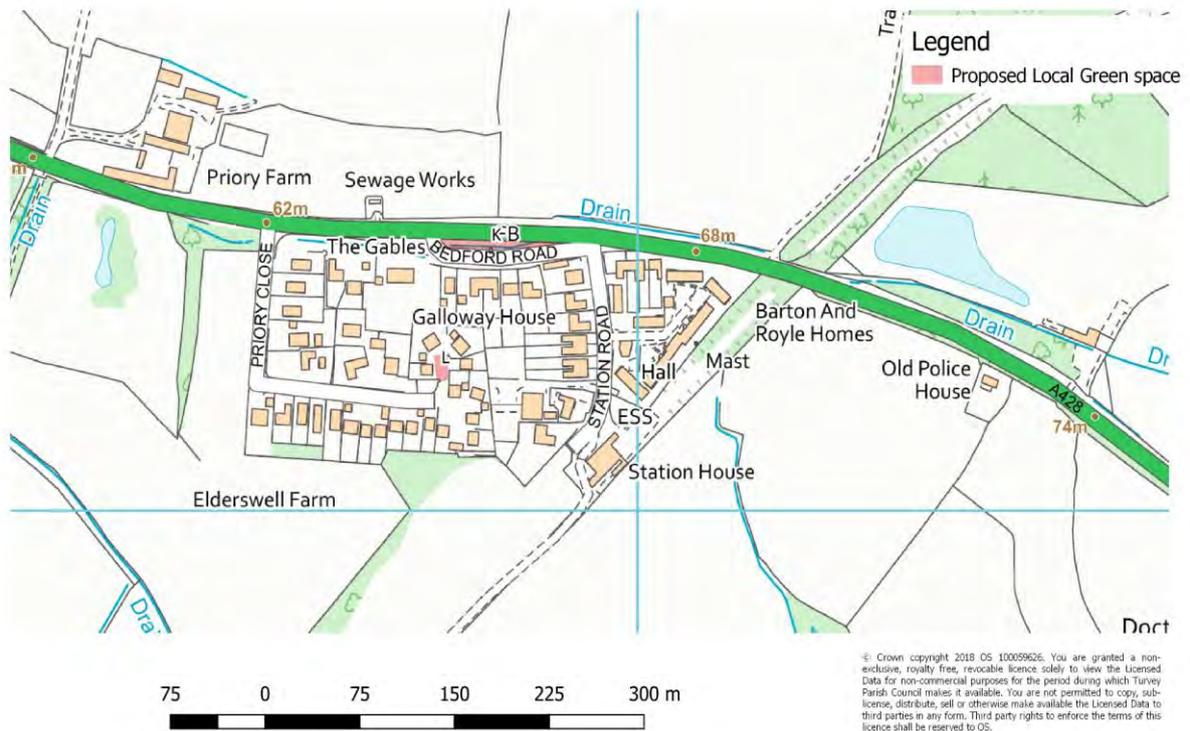
Policy T4: Local Green Space Designations

The following sites (see maps 7 & 8) are designated as Local Green Space:

- Footpath adjacent to Abbey Square and Holmwood House
- The Green
- Lancelot's Piece and The Roundel
- Recreation Ground
- The Cemetery
- All Saints Churchyard
- Area south of river bridge adjacent to The Three Fyshes
- Four paddocks between Jacks Lane and Newton Lane
- Grassed area, Station End
- Priory Close playground
- Turvey (Carlton Road) allotments
- Grassed squares, Grove Road



Map 7: Proposed Local Green Spaces in Turvey Village



Map 8: Proposed Local Green Spaces at Station End

Policy T5: Development and Local Green Spaces

Development shall not encroach on Local Green Spaces.

Development flanking Local Green Space must preserve or enhance the safety, amenity and accessibility of the space.

Development within Local Green Spaces may be supported in exceptional circumstances, subject to all of the following requirements being met:

- It enhances and causes no harm to the community value of the space;
- It is proportionate in scale and footprint, so as to have no significant adverse impact on the open character of the space.

Policy T6: Impact of Drainage

Development must have no adverse impact on the river and sensitive landscapes through run-off of surface water.

Inclusion of facilities for water capture and storage within new development will be supported.

Policy T7: Sustainable Design

Development must incorporate sustainable design. This includes:

- Linking to surrounding pedestrian and cycle paths and ensuring that any new layout is permeable and convenient for pedestrians, including those walking with assistance or with pushchairs, wheelchairs or scooters.
- Designing streets and public realm to encourage low vehicle speeds and support recreational and social activities;
- Providing a variety of car parking so that streets and spaces are not dominated by vehicles;
- Providing active frontages, including windows, to provide natural surveillance to existing and new streets and spaces;
- Taking an integrated approach to designing buildings, public realm, landscape and planting so as to create a locally distinctive sense of place;
- Using high quality, robust and durable materials that reflect the prevailing character of Turvey with a high standard of finish.

Incorporation of local and renewable energy into new development will be supported, subject to having no significant adverse impact on residential amenity. This could include solar panels, heat pumps and grey water capture.

Policy T8: Local Character

Development must complement the existing character of the village and also the immediate site context in terms of:

- The scale, height and massing of new buildings;
- The degree of setback from the road and creation of sense of enclosure to adjacent streets and spaces;
- The relationship of built and open areas within plots.

Development should add to the variety and diversity of local buildings and architecture. Within historic areas and settings, high quality, authentic materials must be used, rather than plastic or other imitations.

Creative or innovative design solutions appropriate to the context will be supported, especially where they incorporate superior environmental performance.

Policy T9: Historic Assets and Settings

Development, and any associated transport infrastructure works or other works required to enable the development, must preserve or enhance the character and interest of the Turvey Conservation Area.

In considering the impact on heritage assets particular regard should be made to the following settings,

- Turvey House (grade I) and its associated stable block (grade II), lodge (grade II) and associated parkland (registered historic park and garden);
- The Church of All Saints (grade I) and enclosed churchyard;
- Turvey Abbey (grade II) and its associated Garden House (grade II) and Stable Block (grade II) and surrounding grounds and parkland;
- Elderswell Farmhouse (grade II) and surrounding grounds
- Holmwood House (grade II) and garden;
- Pictshill House (grade II) and grounds;
- Priory Farmhouse and associated barn (grade II);
- Station House, Station End (grade II).
- Turvey Cottage (grade II) and surrounding grounds
- Turvey Bridge (scheduled monument) and its open landscape setting;
- The various grade II listed buildings that help form the character of the historic village core.

Development must preserve or enhance the architectural and historic interest of non-designated assets recorded in the Bedford Borough Historic Environment Record and their setting

Policy T10: Broadband

Development must incorporate high speed broadband connectivity within the site, so as to be ready when local services are improved.

Policy T11: Transport

Development must incorporate balanced and sustainable provision of transport, including facilities and connections for vehicles, public transport, cycling and walking. Development must include facilities and connections for charging electric vehicles.

New development must have no significant adverse impact on traffic safety, road and on-road parking capacity, in particular on the following identified congestion points:

Bridge Street;
High Street;
Bedford Road (Station End);
Carlton Road;
Newton Lane,
Junctions with the A428.

Development must include sufficient off-road parking to support the size and type of properties.

Where development would require infrastructure improvements to be made, such improvements must be designed to complement and have no significant adverse impact on the character and appearance of the village and its rural lanes.

Policy T12: Employment and Community Facilities

Development to improve existing local employment and community facilities or to create new facilities within the Settlement Policy Area will be supported, providing there is no significant adverse impact on the amenity of nearby residents.

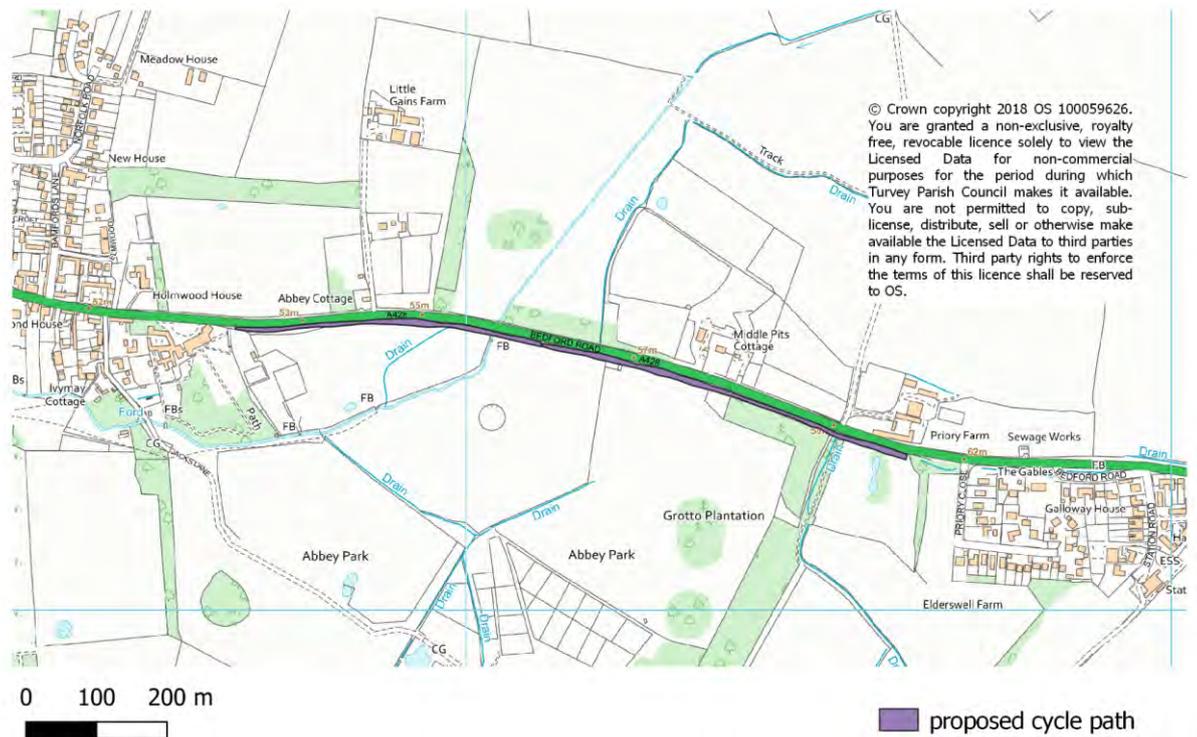
Proposals for outdoor leisure, recreation and sport will be welcomed. This includes formal and informal play space, footpaths and bridleways.

Planning permission for development that involves the loss of existing pubs, shops and other community facilities will only be granted where the applicant can provide evidence that sufficient alternative facilities are available within the village to serve local community needs.

Policy T13: Footway and Cycleway Route

The route for realigning and improving the footway/cycleway between Turvey village centre and Station End (see map 9) is protected. Development must not encroach onto the protected route.

Development flanking or near to the route shall protect the amenity, safety or accessibility of the route and where necessary enhance the route.



Map 9: Proposed route of cycle/footway

- 4.6 To fulfil one of the basic conditions these policies are required to be in general conformity with strategic policies in the development plan for the local area. This comprises the Core Strategy and Rural Issues Plan, the Allocations and Designations Local Plan and the emerging Local Plan 2030.
- 4.7 In addition to policies, the Turvey NDP also includes a section on non-land use actions which principally relates to traffic and transport matters within the village.

5. Assessment

- 5.1 The first part of the assessment is to establish the need for the SEA. The table below shows the assessment determining whether the NP falls into a category of plans requiring SEA. The references to Articles are from Directive 2001/42/EC of the European Council on the assessment of the effects of certain plans and programmes on the environment.

Stage	Y/N	Reasons
1. Is the NP subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through legislative procedure by Parliament or Government? (Article. 2(a))	Y	The Local Authority has a statutory obligation to make a Neighbourhood Plan once it has successfully passed the stages as set out in the Neighbourhood Planning Regulations.
2. Is the NP required by legislative, regulatory or administrative provisions? (Article. 2(a))	Y	While it is not mandatory for a neighbourhood plan to be prepared, however once made, it is part of the development plan for assessing planning applications.
3. Is the NP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, telecommunications, tourism, town and country planning or land use, AND does it set framework for future development consent of projects in Annexes I and II to the EIA Directive? (Article. 3.2(b))	N	The NP is prepared for town and country planning and land use purposes but does not explicitly set a framework for future development consent of projects in Annexes I or II of the EIA Directive.
4. Will the NP, in view of its likely effect on sites, require assessment under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))	N	An Appropriate Assessment has been carried out which determined that in order to offer protection to European sites, rewording of policies was required. The amended policies will avoid or mitigate the likely significant effects.
5. Does the NP determine the use of small areas at local level OR is it a minor modification of a	Y	Yes, the Neighbourhood Plan relates to the local area of the designated Neighbourhood Area.

Stage	Y/N	Reasons
plan/programme (Article 3.3)		
6. Does the NP set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Article. 3.4)		N/A
7. Is the NP's sole purpose to serve national defence or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Article. 3.8 & Article. 3.9)		N/A
8. Is the NP likely to have a significant effect on the environment? (Article. 3.5)	N	See the following table.

5.2 The next step in the screening assessment is to establish whether the NP is likely to have a significant effect on the environment. The criteria for determining the likely significance of effects are drawn from the Annex II of SEA Directive 2001/42/EC and is also set out in Schedule 1 of The Environmental Assessment of Plans and Programmes Regulations 2004.

Criteria for determining the likely significant effects (Annex II SEA Directive)	Summary of significant effects	Likely to have significant environmental effects Y/N
The characteristics of plans and programmes, having regard, in particular, to—		
1a 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 plan provides for up to 50 new dwellings over 2 sites	N
1b The degree to which the plan or programme influences other plans and programmes including those in a hierarchy	The plan will be complementary to the Bedford Borough Development Plan.	N
1c The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development	The achievement of sustainable development is one of the basic conditions that a Neighbourhood Plan must meet.	N
1d Environmental problems relevant to the plan.	There are no environmental problems relevant to the plan in this parish.	N
1e The relevance of the plan or programme for the implementation of	The plan does not relate to waste management or water protection.	N

Criteria for determining the likely significant effects (Annex II SEA Directive)	Summary of significant effects	Likely to have significant environmental effects Y/N
Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection or renewable energy generation)		
Characteristics of the effects and of the area likely to be affected, having regard, in particular, to—		
2a The probability, duration, frequency and reversibility of the effects	The plan includes allocations for up to 50 new dwellings and considering the sites were put forward during the process, it is highly likely that these sites will be developed.	N
2b The cumulative nature of the effects	The plan covers a small area and considering that the plan is for a small number of dwellings up to 2030, the cumulative effects impacts are considered to be minimal.	N
2c The transboundary nature of the effects	Given the small scale development proposed, it is not considered that the effects will have any impact outside the borough or indeed the parish.	N
2d The risks to human health or environment (e.g. due to accidents)	The allocations are only for housing and it is not considered that this will cause a risk to human health or the environment due to accidents.	N
2e The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	The population recorded at the 2011 Census was 1,225 and included 525 dwellings. The Neighbourhood Plan covers the whole parish which has an area of 1,630 ha.	N

Criteria for determining the likely significant effects (Annex II SEA Directive)	Summary of significant effects	Likely to have significant environmental effects Y/N
<p>2f 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 or limit values; or • Intensive land use 	<p>The plan includes policies to ensure that cultural heritage is either preserved or enhanced. There are no other special natural characteristics that are related to the allocated development sites or within the SPA boundary. The proposed development is not considered to be an intensive land use due to the scale of development.</p>	<p>N</p>
<p>2g The effects on areas or landscapes which have a recognised national, community or international protection status.</p>	<p>There are no national or internationally recognised areas or landscapes within the parish.</p>	<p>N</p>

6. Screening Outcome

- 6.1 The screening assessment undertaken in Section 5 concludes that it is unlikely there will be any significant environmental effects arising from the Turvey NDP. This conclusion is supported by screening opinion evidence from the three statutory bodies (Environment Agency, Natural England, Historic England) consulted. See Appendix 1,2 and 3.
- 6.2 Based on the above information, the 'Responsible Body' being Turvey Parish Council concludes that a Strategic Environmental Assessment is not required.

Appendix 1: Screening opinion from Natural England

From: [SM-NE-Consultations \(NE\)](#)

Sent: 06 December 2019 08:29

To: turveyneighbourhoodplan@btinternet.com

Subject: Turvey Neighbourhood Plan SEA/HRA - NE ref. 299839

Our Ref: 299839

Dear Paul

Thank you for your consultation regarding the Turvey Neighbourhood plan, Draft screening report dated 5th November 2019.

Strategic Environmental Assessment (SEA) 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) are concerned, that there are unlikely to be significant environmental effects from the proposed plan.

Guidance on the assessment of Neighbourhood Plans in light of the SEA Directive is contained within the National Planning Practice Guidance. The guidance highlights three triggers that may require the production of an SEA, for instance 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 may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

We have checked our records and based on the information provided, we can confirm that in our view the proposals contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect.

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 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 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 (HRA) Screening

Natural England agrees with the report's conclusions that the Turvey Neighbourhood Plan would not be likely to result in a significant effect on any European Site, either alone or in combination and therefore no further assessment work would be required.

Kind regards,

Jacqui Salt

Natural England

Consultation Service

Hornbeam House

Crewe Business Park

Electra Way,

Crewe

Cheshire, CW1 6GJ

Enquiries line: 0300 060 3900

Email: consultations@naturalengland.org.uk

www.gov.uk/natural-england

Appendix 2: Screening opinion from the Environment Agency

RE: Turvey Neighbourhood Plan - SEA screening consultation

Benn, Neville <neville.benn@environment-agency.gov.uk>

To: Turvey Neighbourhood Plan

Thu, 21 Nov 2019 at 10:05

Dear Paul

We agree with the conclusions you have reached.

Kind regards

Neville Benn

Senior Planning Advisor

Sustainable Places

East Anglia Area (West)

* Environment Agency, Bromholme Lane, Brampton, Huntingdon, Cambs. PE28 4NE

Appendix 3: Screening opinion from Historic England

Mr Paul Jenkins
Turvey Neighbourhood Plan Steering Group
Turvey
Bedfordshire

Direct Dial: 01223 582746

Our ref: PL00636503
26 November 2019

Dear Mr Jenkins

RE: Turvey Neighbourhood Plan SEA Screening

Thank you for inviting Historic England to comment on the above consultation. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore we welcome this opportunity to review the Screening Report for this plan. For the purposes of this consultation, Historic England will confine its advice to the question, "Is it (the Turvey Neighbourhood Plan) likely to have a significant effect on the historic environment?". Our comments are based on the information supplied with the Screening Opinion.

The Screening Report indicates that the Council considers that the plan will not have any significant effects on the historic environment. We note that the plan proposes to allocate two sites for development.

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 'SEA' Directive], Historic England concurs with the Council that the preparation of a Strategic Environmental Assessment is not required.

The views of the other two statutory consultation bodies should be taken into account before the overall decision on the need for an SEA is made.

I should be pleased if you can send a copy of the determination as required by REG 11 of the Environmental Assessment of Plans and Programmes Regulations 2004.

We should like to stress that this opinion is based on the information provided by you with your correspondence dated 5th November. To avoid any doubt, this does not reflect our obligation to provide further advice on later stages of the SEA process and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the plan) where we consider that, despite the SEA, these would have an adverse effect upon the environment.

Historic England strongly advises that the conservation and archaeological staff of the relevant local authorities are closely involved throughout the preparation of the plan and its assessment. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the Historic Environment Record (HER), how the allocation, policy or proposal can be tailored to minimise potential adverse impacts on the

historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'E. James', is written over a faint, repeating watermark of the word 'electronic'.

Edward James
Historic Places Advisor, East of England
Edward.James@HistoricEngland.org.uk
