

Strategic Environmental Assessment
Screening Report
Stevington Neighbourhood Plan

October 2018

1 Introduction

- 1.1 This screening report is used to determine whether or not the content of the Stevington Neighbourhood Plan requires a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004. These require a 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.** Neighbourhood Plans (NP) containing land allocations for development that are not **included in the local authority’s plan, are** more likely to require a 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 Stevington 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

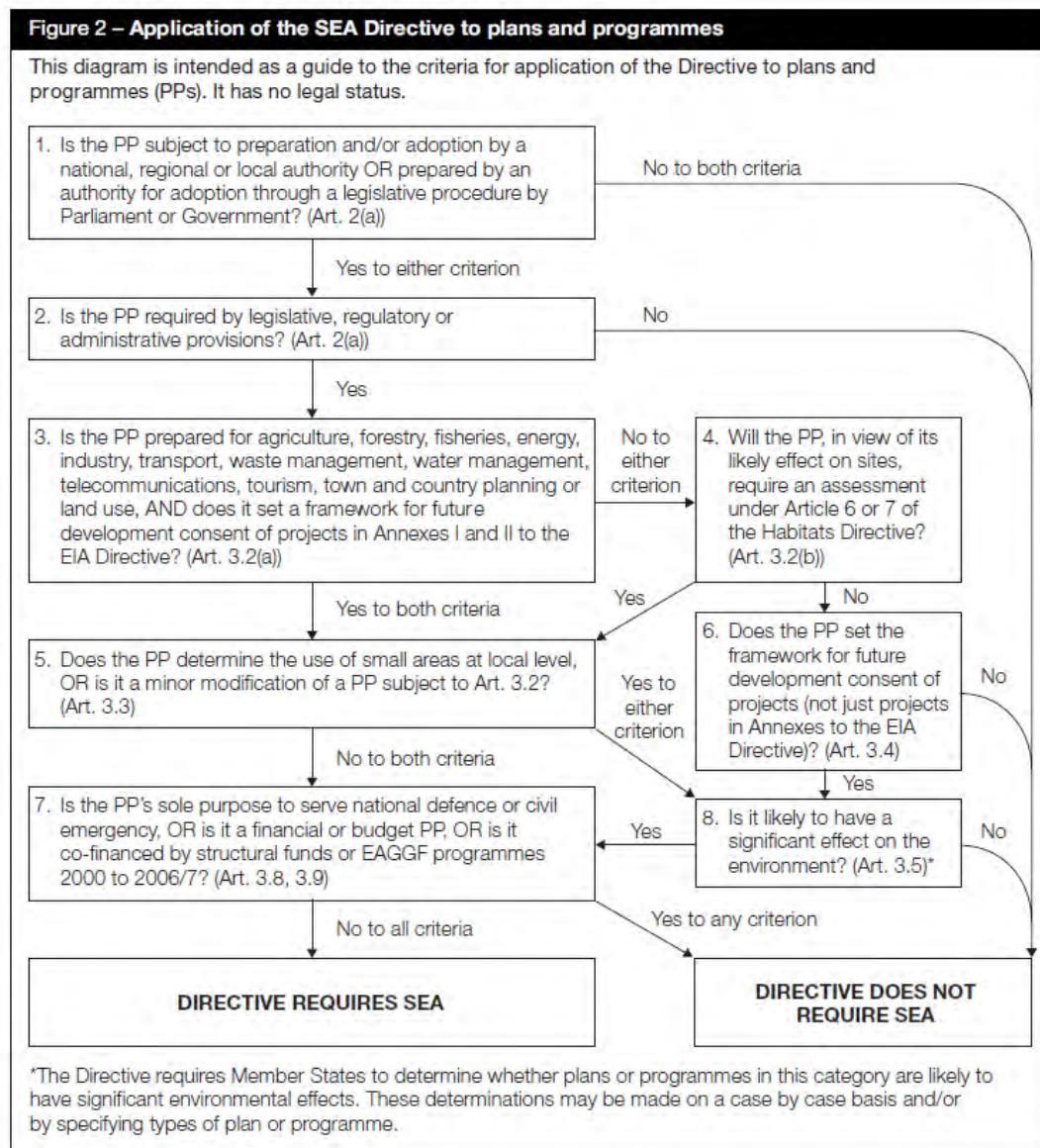
9. (1) The responsible authority shall determine whether or not a plan, programme or modification of a description referred to in -
- a. paragraph (4) (a) and (b) of regulation 5;
 - b. paragraph (6)(a) of that regulation; or
 - c. paragraph (6) (b) of that regulation, is likely to have significant environmental 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 Stevington NP requires a SEA and whether it may have a significant environmental effect.

4 Summary of Stevington Neighbourhood Plan

- 4.1 Stevington Parish Council has produced a draft Neighbourhood Plan with the following policies:
- Policy HO1: Development Sites
 - Policy HO2: Housing Need
 - Policy HO3: Change of Use to Dwellings
 - Policy HO4: Subdivision of existing buildings, redevelopment following demolition
 - Policy DH1: Design and Character
 - Policy DH2: Undesignated Heritage
 - Policy DH3: Windmill Wind Corridor
 - Policy EN1: (no name but relating to the environment)
 - Policy LE2: Local Green Space
 - Policy CF1: Community Facilities
 - Policy TI1: Traffic Impact
 - Policy TI2: Cycling and Walking
 - Policy TI3: Sustainable Urban Drainage
 - Policy BE1: Business, Employment and Tourism
 - Policy BE2: Broadband
- 4.2 The draft plan does not have any allocations for development, but relies on future development to be located within the existing Settlement Policy Area.

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 Stevington 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 specifically 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 plan/programme (Article 3.3)	Y If yes, go to Q8	Yes, the Neighbourhood Plan relates to the local area of the designated Neighbourhood Area.
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 Stevington 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 are 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 draft NP does not set out any allocations, although there is policy relating to the location of development within the existing Settlement Policy Area.	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.	The plan does not raise any environmental problems.	N
1e 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 or renewable energy generation)	The plan does not relate to waste management or water protection.	N
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 period is for up to 2035 and is for limited development within the parish during this time.	N

Criteria for determining the likely significant effects (Annex II SEA Directive)	Summary of significant effects	Likely to have significant environmental effects Y/N
2b The cumulative nature of the effects	The plan covers a small area and given that it is not allocating sites and is a small area, it is considered that the cumulative effects are 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 draft plan includes policies regarding future development 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 as calculated from the 2011 census was 552 and there were 280 dwellings. The area of the parish was 678 hectares which equates to a population density of 0.8 people per hectare.	N
2f The value and vulnerability of the area likely to be affected due to: <ul style="list-style-type: none"> • Special natural characteristics or cultural heritage; • Exceeded environmental quality standards or limit values; or • Intensive land use 	The area that is likely to be developed is land within the existing Settlement Policy Area which does have a conservation area and listed buildings, however the development will be limited to infill as there is no extension of the Settlement Policy Area proposed.	N
2g The effects on areas or landscapes which have a recognised national, community or international protection status.	There are no national or internationally recognised areas or landscapes within the parish. There are no recognised community areas or landscapes within the parish.	N

6 Screening Outcome

Bodsey Ecology Ltd undertook a Habitats Assessment of both the Stevington Neighbourhood Plan and the Bedford Borough Council Local Plan 2030. In response to the Habitats Assessment, amendments have been made to the Stevington Neighbourhood Plan which strengthen environmental protections.

Based on the above information, the ‘Responsible Body’ (being Stevington Parish Council) conclude that there is no significant environmental impact and therefore a Strategic Environmental Assessment is not required.

Appendix A

1. Text of request for formal screening. Sent to Natural England, Historic England and the Environment Agency on 21st October 2018

I contacted you by email last week to ask that Natural England screen Stevington Neighbourhood Plan for compliance with all necessary legislation and best practice. Our contact at Bedford Borough Council, Sonia Gallagher (Senior Planning and Transportation Officer) has since recommended that we include in the list of documents the SEA screening template which she has assisted us with. It is attached, together with all previously supplied documents for your ease of reference.

Sonia also advises that we set a 'consultation period' which is apparently within five weeks. As we are providing documents for Monday 22nd October this would suggest a response by 23rd November 2018 at the latest. However, as we have a Parish Council meeting on 14th November, if a response could be given before that meeting, we would be extremely grateful.

Best wishes,

Tricia Lennie


Clerk - Stevington Parish Council

Email: stevingtonpc@live.co.uk

Website: <http://stevington.bedsparishes.gov.uk>


2. Copy of email reply from Natural England 13th November 2018

FW: 2018-11-26 Stevington Neighbourhood Plan SEA/HRA (Bedford BC) *LPA preferred deadline 14th Nov*



Bush, Anna (NE) <Anna.Bush@naturalengland.org.uk>
To: planning@bedford.gov.uk; Stevingtonpc@live.co.uk
Cc: pc@stevington.com

Follow up.
You replied to this message on 17/05/2019 18:06.
This message was sent with High importance.

 262148 - NE RESPONSE.pdf
274 KB

Reply

Reply All

Forward

...

Tue 13/11/2018 15:01

Dear Tricia,

Many thanks for consulting Natural England on the above Plan.

Please find Natural England's response to Stevington NP attached.

Kind regards,

Anna

Anna Bush
Lead Sustainable Land Use Adviser
Natural England
Eastbrook
Shaftesbury Road
Cambridge
CB2 8DR

Tel: 02080263523 Mob: 07769306951

www.gov.uk/natural-england

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

Natural England offers two chargeable services - the Discretionary Advice Service ([DAS](#)), which provides pre-application and post-consent advice on planning/licensing proposals to developers and consultants, and the Pre-submission Screening Service ([PSS](#)) for European Protected Species mitigation licence applications. These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.

3. Copy of Natural England response

Date: 13 November 2018
Our ref: 262148
Your ref: Stevington (North Bedfordshire) Neighbourhood Plan



FAO Stevington Parish Council

BY EMAIL ONLY

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

T 0300 060 3900

Dear Tricia Lennie

Consultation: Stevington (North Bedfordshire) Neighbourhood Plan

Thank you for your consultation on the above dated 21 October 2018 which was received by Natural England on the same date.

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.

Please find our advice in the comments below.

SEA Screening Report

Within the SEA Screening Report it states *that based on the above information, the 'Responsible Body' (being Stevington Parish Council) conclude that a Strategic Environmental Assessment is not required.* Please note that there is no evidence base or referencing associated with the SEA Screening Report, Table 5.2.

We also note within 5.2 Section 2b that the Neighbourhood Plan (NP) is *not allocating sites*. The NP states that *development will be limited to infill as there is no extension of the Settlement Policy Area proposed*. In addition, on page 27 of the NP it states that *although the emerging Local Plan (2030) does not allocate growth in Stevington, the Parish is planning positively to meet identified local housing needs and will respond to the supply of these new homes by supporting the addition of a further 11-15 dwelling over the lifetime of the Plan*.

Within the Section 5 SEA Screening template Stage 4, it also reads that *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*. We note the amended policies highlighted within the draft plan, and agree with the wording of Support Policy HO1-4, and DH01 from the perspective of satisfying the HRA. However, within these policies, references to retaining and improving links to the surrounding green infrastructure would be desirable.

Context within the Local Plan

Natural England advises that policies and statements within the NP should reference Bedford Borough Council Local Plan 2030 (emerging), rather than the withdrawn 2035 plan.

We note that Policy 6 of the emerging plan states that *... exceptional(ly) development proposals will be supported on sites that are well-related to a defined Settlement Policy Area, Small Settlements or the built form of other settlements where it can be demonstrated that...* We also note that 10 houses were proposed in Stevington at the call for sites stage, however none are being brought forward. The

plans states that *allocation in this location is not required to meet the local plan strategy at this time* within the Strategic Housing and Employment Land Availability Assessment Amended 12/10/2018. However, we note that the NP is proposing its own housing contributions of 11-15 dwellings within the Settlement Policy Area over the plan period.

Please note that if there is no requirement to bring housing forward, then any proposals from the Parish will not be covered by the Local Plans HRA.

Habitats Regulations Assessment

Since the requirement for mitigation measures relies on policy amendments in the LP and NP, the HRA is unable to conclude no likely significant effects. **In accordance with Schedule 2 of The Neighbourhood Planning (General) Regulations 2012, a neighbourhood plan cannot be made if the likelihood of significant effects on any European Site, either alone (or in combination with other plans and projects) cannot be ruled out.**

With respect to your HRA, we would like to draw your attention to the recent judgment from the Court of Justice of the European Union ([Case C-323/17 People Over Wind v Coillte Teoranta](#)) providing authoritative interpretation relating to the use of mitigation measures at the screening stage of a HRA when deciding whether an appropriate assessment of a plan or project is required. The court concluded that measures intended to avoid or reduce the harmful effects of a plan or project on a European Site can only be considered as part of the appropriate assessment stage of HRA, and not at the preceding screening stage. This means that it is no longer appropriate to rely on these measures when deciding whether a plan or project is likely to have a significant effect on a European site(s).

In light of this judgment, Natural England advises that local plan-making authorities may wish to take legal advice on the implications of the judgment to fully understand whether any further assessment of, or changes to, their Plans are now required to ensure their compliance with the Conservation of Habitats & Species Regulations 2017.

We advise that, if reviewing a draft HRA of a Plan, plan-making authorities consider whether there are measures in the Plan that are intended to avoid or reduce the risk or the possibility of significant effects on European Sites that are being relied upon to rule out the need for an appropriate assessment. Where you consider this to be the case, we advise that an appropriate assessment should be undertaken to consider the impacts on the integrity of the European site(s), either alone or in-combination with other plans and projects, in view of the available advice about the site's [conservation objectives](#). However, when determining whether the plan will have an adverse effect on the integrity of the European site at the appropriate assessment stage, a competent authority may take account of those avoidance and mitigation measures. Natural England must be consulted on any appropriate assessment.

Plan-making authorities may also wish to consider the advice about this judgment currently provided by the Planning Inspectorate ([PINS Note 05/2018](#)), which recommends that, where planning cases are on-going and still being determined, any HRAs drafted which contain screening decisions that have taken into account mitigation measures should be re-examined and an appropriate assessment conducted where necessary.

Therefore, measures may need to be incorporated into the neighbourhood plan to ensure that any likely significant effects are avoided in order to secure compliance with the Regulations. A screening exercise should be undertaken (noted) if there is any doubt about the possible effects of the plan on European protected sites. This screening is particularly important since the neighbourhood plan is progressing **before** the local plan has been adopted and the neighbourhood plan proposes development which has not been assessed and/or included in the Habitats Regulations Assessment for the local plan.

Additional advice notes:

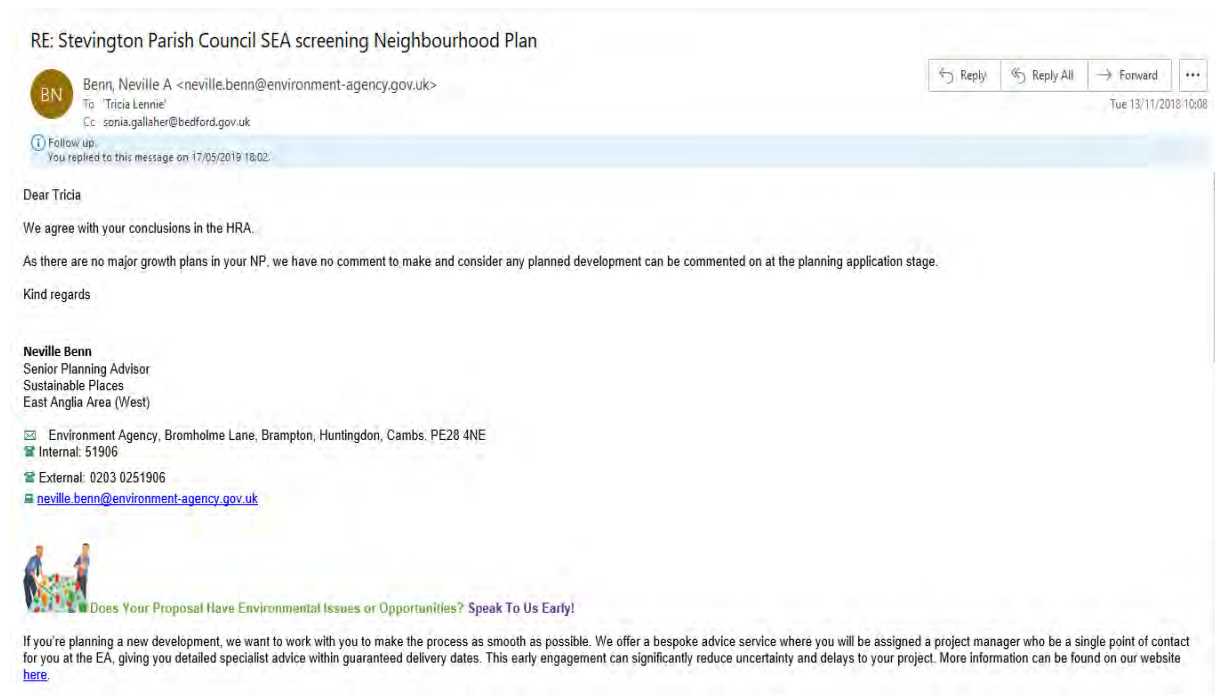
1. Within 1.1.5 it is stated that an Appropriate Assessment (AA2) was undertaken. Please note that Paragraph 1 of Schedule 2 to the Neighbourhood Planning (General) Regulations 2012 includes a basic condition which states that a Neighbourhood Plan can only be made if it is not likely to have a significant effect on a European site.
2. Regarding 1.2.1 and the Habitats Regulations legislation stated, please note that impacts within this NP cannot be ruled out on the basis of other plans' mitigation.
3. References to the NPPF are missing throughout the HRA. For example the Ramsar designation in 2.1.4 is referred to in NPPF (2018) para. 176
4. Section 4.1.2 states that *non-native species are a likely significant effect*, and suggests that the impacts could be eliminated if no householders plant those species for which there's no mechanism of control. This impact pathway lacks clarity, however it is understood that the risk is minimal and difficult to mitigate with certainty.
5. Within 4.1.3 Please note that People Over Wind means that no mitigation measures can be applied at screening to rule out LSE, and not that European sites can't be screened out. This paragraph also provides an example of an instance where amendments to reference HRA, as opposed to AA, should be made.
6. 4.1.3 - The Bedford Borough Local Plan has not yet been to examination, therefore the plan and its associated HRA do not yet carry weight in terms of policy. Where a neighbourhood plan is progressing ahead of the Local Plan the neighbourhood plan will be required to undertake its own HRA — which has been provided. We would like to reiterate that it is not the case that impacts cannot be screened out — as suggested — but there is not an established HRA which otherwise covers the NP area at this time.
7. Within section 4.1 please note that piecemeal developments can often have a wider impact 'in-combination' than singular developments considered independently. Regardless of the plan size, there is still the potential for in-combination impacts and therefore these should not be referred to as an *over-reaction*.
8. Within section 5, the AA conclusion points 5.1.1 and 5.1.2 contradict each other. The first rules out LSE, the second says there will be LSE. The conclusions of the AA are unclear, and do not relate to effects on the integrity of European sites. Therefore the precautionary principle should be applied here.
9. Section 9.1.1 states that there are likely significant effects but only *in combination with other plans*, and that that with policy alterations they can be avoided. The conclusion states that *with alterations to the current policies in the Stevington Neighbourhood Development Plan, and by reference to policies in the Bedford Borough Local Plan to 2030, the likely significant effects can be avoided or mitigated against assuming other local plans and neighbourhood plans in the catchment of The River Great Ouse similarly avoid or mitigate against the same likely significant effects*. Please note that when there is a reliance on the Local plan for mitigation, this mitigation would need to be secured through the adopted Local Plan, since any integrated mitigation could only apply once the Local Plan has been approved.

I trust these comments are helpful.

Yours sincerely


Anna Bush
Lead Sustainable Land Use Adviser

4. Email response from the Environment Agency 13th November 2018



5. Email response from Historic England 23rd November 2018

Historic England advice on case PL00490722



Edward.James@HistoricEngland.org.uk
To: StevingtonPC@live.co.uk
Cc: Edward.James@HistoricEngland.org.uk


↩ Reply


↩ Reply All

→ Forward

⋮

Fri 23/11/2018 12:07

 You replied to this message on 17/05/2019 17:46.
We removed extra line breaks from this message.

 J-HERef_PL00490722_L332782.doc
88 KB

Dear Ms Lennie,

I am writing in relation to the following:

SEA/SA/IIA: Strategic Environmental Assessment/ Sustainability Appraisal/ Integrated Impact Assessment Strategic Environmental Assessment of Stevington Neighbourhood Plan, Bedfordshire [Case Ref. PL00490722; HE File Ref. ; Your Reference.]

Thank you for consulting **Historic England** with regard to this Screening Report for Stevington Neighbourhood Plan. Please find our formal response attached. Please contact me if you have any queries.

Yours Sincerely

Edward James
Historic Places Advisor, East of **England**
E-mail: Edward.James@HistoricEngland.org.uk
Direct Dial: 01223 582746

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6 Copy of Historic England response



Historic England

EAST OF ENGLAND OFFICE

Ms Tricia Lennie
Stevington Parish Council

Direct Dial: 01223 582746

Our ref: PL00490722
23 November 2018

Dear Ms Lennie

RE: Stevington Neighbourhood Plan SEA Screening

Thank you for your email of 21 October 2018 regarding 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 Stevington 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 Stevington Neighbourhood Plan will not have any significant effects on the historic environment. We note from the Screening Report and the content of the Neighbourhood Plan that it is not intended to allocate any sites for development within the neighbourhood area.

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 21 October 2018. To avoid any doubt, this does not reflect our obligation to provide further advice on later stages of the SA/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/guidance) where we consider that, despite the SA/SEA, these would have an adverse effect upon the environment.

Historic England strongly advises that the conservation and archaeological staff of the



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



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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.

Although we have not been able to review the neighbourhood plan in detail, we noted the use of the terminology 'un-designated heritage assets'. We would recommend that 'Non-Designated Heritage Assets' is used instead, to reflect the terminology used in national policy and guidance.

Please contact me if you have any queries.

Yours sincerely,

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



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



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