



Bromsgrove
District Council

www.bromsgrove.gov.uk

FINAL Strategic Environmental Assessment Screening Determination

Alvechurch Parish Neighbourhood Plan

October 2014

1. Introduction

- 1.1. European Union Directive 2001/42/EC requires a Strategic Environmental Assessment to be undertaken for certain types of plans or programmes that would have a significant environmental effect. It is Bromsgrove District Council's responsibility to determine whether an SEA is required on plans within its district. The Environmental Assessment of Plans and Programmes Regulations 2004 (the regulations) require that this is determined by a screening process, which should use a specified set of criteria (set out in Schedule 1 of the Regulations). The results of this process must be set out in an SEA Screening Statement, which must be publicly available. Before the Council make a formal determination, there is a requirement to consult three statutory consultation bodies designated in the regulations (English Heritage, Environment Agency and Natural England) on whether an environmental assessment is required.
- 1.2. This document is the Screening Determination of the need to carry out a Strategic Environmental Assessment for the **Alvechurch Parish Neighbourhood Plan** and is made in accordance with the regulations. If it determines that an SEA is not required, the statement must include reasons for this Determination.
- 1.3. If significant environmental impacts are triggered by the implementation of a neighbourhood plan it is considered prudent to advise that a SA/SEA is required. As such it is important to determine whether there would be significant environmental impacts as per the SEA Directive.

2. The requirement for Strategic Environmental Assessment and Sustainability Appraisal

- 2.1. Strategic Environment Assessment is a requirement of the [European Union Directive 2001/42/EC](#) (Strategic Environmental Assessment (SEA) Directive). This Directive sets out the specific types of plans and programmes to which it applies, with Article 3(2) specifying that SEA is mandatory for plans and programmes which are prepared for town and country planning or land use and those which set the framework for future development consent. The Directive was transposed into law in England by the [Environmental Assessment of Plans and Programmes Regulations 2004 \(the SEA Regulations\)](#). Detailed guidance on these regulations can be found in the Government publication [A Practical Guide to the Strategic Environmental Assessment Directive](#) (ODPM 2005).
- 2.2. It is one of the [basic conditions](#) of producing a Neighbourhood Plan that EU obligations are fulfilled. One such EU obligation is the SEA Directive, which it states may be of relevance to Neighbourhood Planning¹. Further guidance is given in the Planning Practice Guidance as follows:

Does a neighbourhood plan require a strategic environmental assessment?

¹ Planning Practice Guidance: Reference ID: 41-078-20140306

In some limited circumstances, where a neighbourhood plan could have significant environmental effects, it may fall within the scope of the Environmental Assessment of Plans and Programmes Regulations 2004 and so require a strategic environmental assessment. One of the basic conditions that will be tested by the independent examiner is whether the making of the neighbourhood plan is compatible with European Union obligations (including under the Strategic Environmental Assessment Directive).

Whether a neighbourhood plan requires a strategic environmental assessment, and (if so) the level of detail needed, will depend on what is proposed in the draft neighbourhood plan. A strategic environmental assessment may be required, for example, where:

- a neighbourhood plan allocates sites for development*
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan*
- the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.²*

2.3. The Council, as a Responsible Authority under the Directive and the associated Regulations, must carry out a screening process to determine whether plans or programmes are likely to have significant environmental effects, and hence whether SEA is required under the Directive.

2.4. Sustainability Appraisal is a separate requirement of the [Planning and Compulsory Purchase Act 2004](#)³. Sustainability Appraisal considers the social, environmental and economic impacts of a plan. The Act and the associated [Regulations](#)⁴ set out the requirement to carry out Sustainability Appraisal on all Development Plan Documents. Development Plan Documents are planning policy documents which set policies for the use of land or allocate sites for development. Sustainability Appraisal is not legally required for Neighbourhood Plans. There is however a requirement for a qualifying body to demonstrate how its plan will contribute to achieving sustainable development⁵. A sustainability appraisal could be the approach through which this is done.

3. The Alvechurch Parish Neighbourhood Plan

3.1. Work on the Alvechurch Parish Neighbourhood Plan commenced in 2011 as the parish Council wanted the people of the parish to have a say in all aspects of the future of the area, but importantly it wanted local people to decide where new housing (if needed) should go and what it should look like.

3.2. Alvechurch Parish is located in Bromsgrove within Worcestershire. The parish borders both the city of Birmingham and the new town of Redditch. The majority of

² Planning Practice Guidance: Reference ID: 11-027-20140306

³ PCPA 2004 Section 19 (5) Local development documents

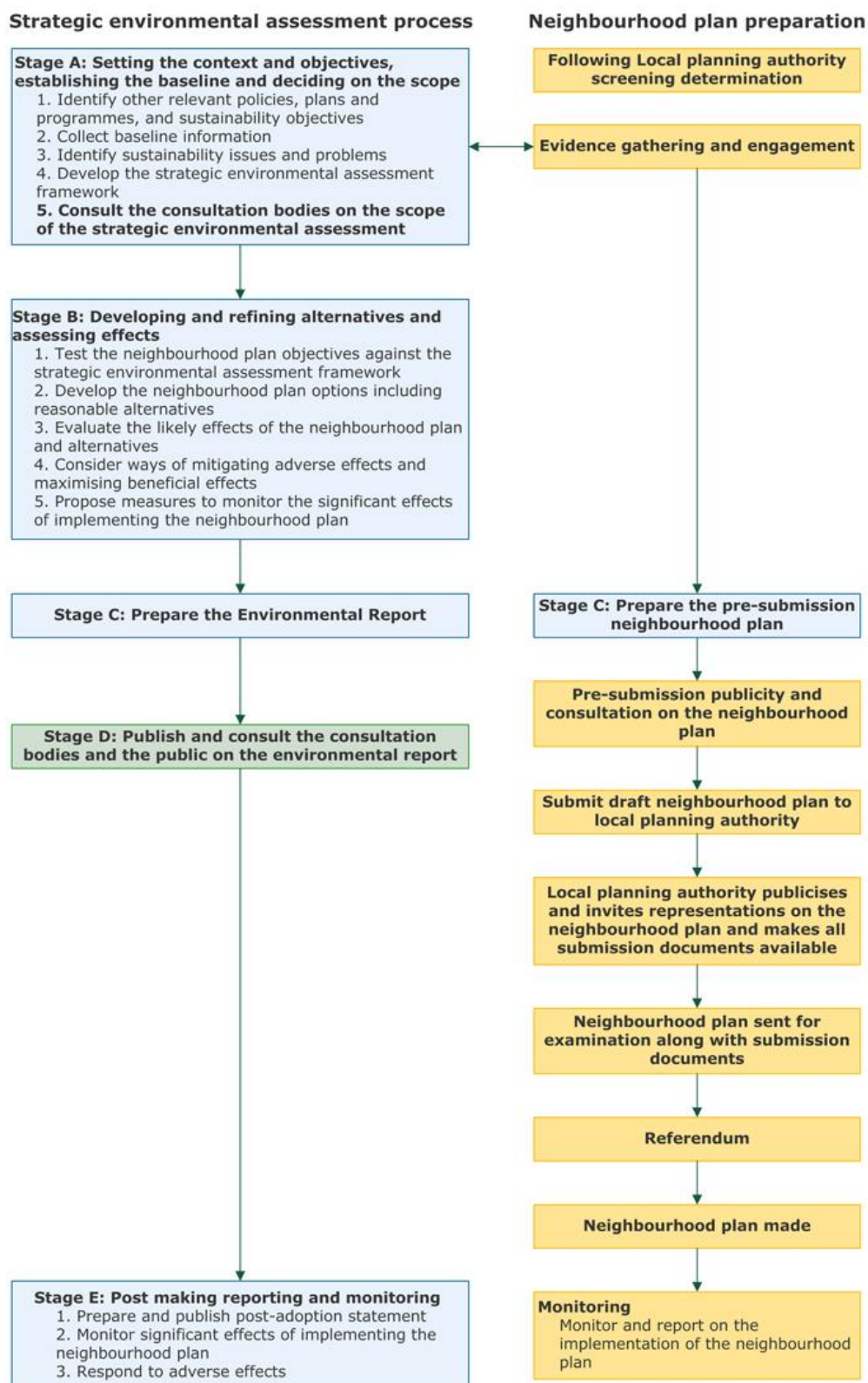
⁴ The Town and Country Planning (Local Planning) (England) Regulations 2012

⁵ Planning Practice Guidance: Reference ID: 11-026-20140306

the parish area is designated as Green Belt, with the exception of Alvechurch village which has a tightly drawn village envelope around the built development of the village. All the other smaller settlements within the parish, such as Hopwood and Rowney Green are washed over by Green Belt. The parish has many assets including Sites of Special Scientific Interest, Local Wildlife Sites, areas of high Landscape Character, Scheduled Monument and a Conservation Area centred on the heart of the village.

4. Applying the SEA Directive to Neighbourhood Planning

4.1. The diagram below illustrates where the Directive applies and can be followed during the Neighbourhood Planning process. It is taken from the Planning Practice Guidance⁶.



⁶ Planning Practice Guidance: Reference ID: 11-033-20140306

Appendix A - Responses received from Statutory Consultees – Spring 2013

5. The Environmental Assessment of Plans and Programmes Regulations 2004: Schedule 1

5.1. How do you know if a draft neighbourhood plan might have significant environmental effects?

To decide whether a draft neighbourhood plan might have significant environmental effects, its potential scope should be assessed at an early stage against the criteria set out in Schedule 1 to the Environmental Assessment of Plans and Programmes Regulations 2004.

The local planning authority should put in place a process to provide a screening opinion to the qualifying body on whether the proposed neighbourhood plan will require a strategic environmental assessment. The qualifying body should work with the local planning authority to be sure that the authority has the information it needs in order to provide a screening opinion.

When deciding on whether the proposals are likely to have significant environmental effects, the local planning authority should consult the statutory consultation bodies. Where the local planning authority determines that the plan is unlikely to have significant environmental effects (and, accordingly, does not require an environmental assessment), it should prepare a statement of its reasons for the determination. Where a statement of reasons is provided in respect of a neighbourhood plan a copy of the statement should be provided to the qualifying body in order that the statement can be made available to the independent examiner. For example by including it in the basic conditions statement.

Where a neighbourhood plan is likely to have a significant effect on the environment a strategic environmental assessment must be carried out.

5.2. SEA Screening of Likely Significant Effects

5.3. The table below sets out the assessment against the Strategic Environmental Assessment criteria for the Alvechurch Parish Neighbourhood Plan. This is to determine whether the implementation of the Neighbourhood Plan will have a significant effect on the environment. This criteria against which the screening is carried out are taken directly from Annex II of the European Union Directive 2001/42/EC (also known as the SEA Directive), as required by Article 3(4).

Table 1: Criteria for determining the likely significance of effects on the environment

Criteria for determining the likely significance of effects (Annex II SEA Directive)	BDC Response	Is there a significant effect on the environment?
1. The characteristics of plans and programmes, having regard, in particular to:		
(a) 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 overarching framework for planning policy is set in the National Planning Policy Framework and Planning Practice Guidance. Once adopted, the Neighbourhood Plan will form part of the Development Plan and planning applications within the designated	No

Criteria for determining the likely significance of effects (Annex II SEA Directive)	BDC Response	Is there a significant effect on the environment?
	parish area must be determined in compliance with the Neighbourhood Plan. The Neighbourhood Plan will not allocate resources.	
(b) the degree to which the plan or programme influences other plans or programmes including those in a hierarchy.	The Neighbourhood Plan produced will be in conformity with the Development Plan in terms of the National Planning Policy Framework and Bromsgrove District Plan which have been subject to full SEA and Sustainability Appraisals.	No
(c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development	The Neighbourhood Plan will need to be in conformity with the Bromsgrove District Plan which advocates sustainable development. It is also one of the Basic Conditions of producing a Neighbourhood Plan that it should contribute to the achievement of sustainable development. However should Alvechurch Neighbourhood Plan propose allocating sites, this may impact on sustainable development as land would need to be removed from the Green Belt. We would advise that a SA/SEA is carried out.	Potentially
(d) environmental problems relevant to the plan	At this stage it is considered that the NP will not introduce any environmental problems, rather it will seek to encourage sensitive development in relation to the environment. However should Alvechurch Neighbourhood Plan propose locations for development this may cause environmental problems that haven't been considered within the Bromsgrove District Plan Sustainability Appraisal and we would advise that a SA/SEA is carried out.	Potentially
(e) 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)	This Neighbourhood Plan will not impact on the implementation of European Community legislation on the environment.	No
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:		
(a) the probability, duration, frequency and reversibility of the effects	It is considered that the overall impact of the Neighbourhood Plan will be positive by maximising the positive environmental effects of development and minimising or avoiding negative	Potentially

Criteria for determining the likely significance of effects (Annex II SEA Directive)	BDC Response	Is there a significant effect on the environment?
	impacts. However should Alvechurch Neighbourhood Plan be proposing locations for development, this may cause irreversible effects that haven't been considered as part of the Bromsgrove District Plan Sustainability Appraisal and we would advise that a SA/SEA is carried out.	
(b) the cumulative nature of the effects	It is considered that the effect of this Neighbourhood Plan will be largely beneficial therefore any cumulative impacts will also be beneficial. However should Alvechurch NP proposing locations for development we would advise that an SA/SEA is carried out.	Potentially
(c) the trans boundary nature of the effects	The effects of policy are limited to the Neighbourhood Plan boundary.	No
(d) the risks to human health or the environment (e.g. due to accidents)	No significant risks to human health are envisaged through the application of this Neighbourhood Plan.	No
(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	The Neighbourhood Plan is applicable only to developments within the Alvechurch parish area.	No
(f) the value and vulnerability of the area likely to be affected due to: (i) special natural characteristics or cultural heritage (ii) exceeded environmental quality standards (iii) intensive land-use	The Neighbourhood Plan is applicable to developments within Alvechurch Parish, which includes a Conservation Area and listed buildings. Policy impacts on heritage have been assessed through the Sustainability Appraisal of the emerging Bromsgrove District Plan. Should the Neighbourhood Plan propose new areas for development there may be impacts to environmental quality and heritage of the area and SEA/SA scoping would need to be carried out to mitigate the impact.	Potentially
(g) the effects on areas or landscapes which have a recognised national, community or international protection status	The overall impact of the Neighbourhood Plan will be positive by maximising the positive environmental effects of development and minimising or avoiding negative impacts. Bromsgrove has a number of sites of importance for nature conservation but these are protected by separate policies in the emerging Bromsgrove District Plan. However should the Neighbourhood Plan propose locations for	Potentially

Criteria for determining the likely significance of effects (Annex II SEA Directive)	BDC Response	Is there a significant effect on the environment?
	development, the wider landscape and protected designations may be impacted thus we would advise an SA/SEA is carried out.	

6. Consultation with Statutory Bodies

- 6.1. The three statutory consultation for Strategic Environmental Assessment in England were consulted in February 2013. The consultation included a map of the Parish, a draft schedule of plan objectives (at January 2013) and an outline sustainability issues SWOT analysis.
- 6.2. The consultation responses are attached in full at Appendix A. A summary of the responses is detailed in the table below:

Table 2: Consultee Responses

Consultation Body	Consultee Response	Council's Actions
Natural England Response received 27 February 2013	<p>Considers that SEA would be required given that the plan's objectives relate to the location of housing and associated infrastructure.</p> <p>Also suggest that SA would be needed because of the changes the plan may make to the environment, society or local economy.</p>	Comments noted.
English Heritage Response received 18 March 2013	<p>Draft objectives refer to the Plan identifying areas of search for new housing and potentially business development. Unclear at present how much these proposals would effect the historic environment and heritage assets of the Council.</p> <p>Noted that the draft objectives do not included any provisions for conservation or enhancement of the historic environment or heritage assets.</p> <p>Therefore insufficient information at present to determine the likely impact of the plan and any significant effects on cultural heritage.</p> <p>Recommend that a concise Screening Report is prepared to help inform the decision on SEA.</p> <p>Notes that the views of other statutory consultation bodies should be taken into account before an overall decision on the need for SEA is made.</p>	Comments noted. It was not felt necessary to produce a Screening Report, on the basis of the other consultee's comments.

Consultation Body	Consultee Response	Council's Actions
<p>Environment Agency Response received 3 April 2013</p>	<p><u>Flood Risk</u> The Neighbourhood Plan area is part of the River Arrow catchment and as such all water flows through to Redditch which has known flooding issues. The Neighbourhood Plan may wish to promote/focus on reducing any known flooding hotspots. Recommend that flooding is highlighted as an issue to the local community. North Worcestershire Water Management Team (as Lead Local Flood Authority) should be consulted with</p> <p><u>Water Quality / Ecology</u> Neighbourhood Plan should look to conserve biodiversity assets and promote the enhancement of biodiversity in accordance with the BAP. The Upper River Arrow catchment has several important conservation sites including the Bittel Reservoir complex (SSSI) and Hopwood Dingle (SSSI). River Arrow catchment has been classed as moderate ecological status under the WFD.</p> <p>As part of the plan we would wish to see the river habitat corridor maintained and improved.</p> <p>The north of the plan area is considered particularly sensitive as there are numerous sites of significant ecological importance and it is used for water abstraction purposes.</p> <p><u>Groundwater Vulnerability / Contaminated Land</u> The Parish is located on Mercia Mudstone which is classed as low sensitivity Secondary B Aquifer and not particularly vulnerable. There are groundwater Source Protection Zones in Hopwood for public water abstraction which would restrict certain activities.</p> <p>There are also a number of historic waste pits within the plan area.</p> <p><u>Sustainable Development</u> Advise consideration of water efficiency techniques within the design of dwellings and commercial/employment buildings.</p> <p><u>Summary</u> Do not consider that there would be</p>	<p>Detailed comments noted and will be taken forward when drafting the plan and in the production of the SA documentation.</p>

Consultation Body	Consultee Response	Council's Actions
	'significant environmental effects' as a result of the plan. Reference should be made to BDC's Water Cycle Study work which may need to be updated to inform the plan.	

7. SEA Determination and Reasons for Determination

- 7.1. An assessment against the SEA criteria to determine the likely significant effects of introducing a Neighbourhood Plan for Alvechurch Parish has been carried out at Table 1. It finds that in the opinion of the local authority, there are potentially significant effects on the environment from the implementation of the proposed Neighbourhood Plan, largely because it is the intention of the Parish Council that the plan will allocate sites for housing and potentially other uses. Given the Green Belt context of the Parish, there is the potential for these sites and their proposed uses to have an adverse impact on the environment. **This document is the SEA Determination as it proposes that the Council have complied with Regulation 9(1), as it finds that SEA is required for the Alvechurch Parish Neighbourhood Plan.**
- 7.2. Taking all of the comments together, and with the benefit of Council officer knowledge of the Parish's intentions for their Neighbourhood Plan, we believe this determination reflects the view of the statutory environmental consultation bodies as detailed in Table 2.
- 7.3. This determination is made on 2nd October 2014.

8. Next Steps

- 8.1. Sustainability Appraisal will be carried out on the Neighbourhood Plan. In line with guidance and best practice, this work will integrate the requirements of the SEA Regulations. This will ensure that the potential environmental effects (the focus of SEA) are given full consideration alongside social and environmental issues.⁷
- 8.2. The Parish Council are currently in the process of producing a draft Neighbourhood Plan. They have also carried out work on the Sustainability Appraisal Scoping Report, and it is their intention that consultation on this will be carried out shortly (Autumn 2014).
- 8.3. As part of producing and refining the draft plan, Sustainability Appraisal will need to be carried out on the policies that are being proposed, and amendments made to the policies in light of the appraisal outcomes. This will culminate in a Sustainability Appraisal Report which will sit alongside draft Neighbourhood Plan when it goes out to formal consultation.
- 8.4. Further detail on the Alvechurch Parish Neighbourhood Plan can be found on the Bromsgrove District Council website at: <http://www.bromsgrove.gov.uk/cms/environment-and-planning/planning/strategic-planning/neighbourhood-planning.aspx> or on the Alvechurch Parish Council dedicated Neighbourhood Plan website at: <http://alvechurchparishplan.org/>

⁷ Planning Practice Guidance: Reference ID: 11-001-20140306

Appendix A - Responses received from Statutory Consultees – Spring 2013

Natural England

Date: 27 February 2013
Our ref: 78236
Your ref: Alvechurch NP

Tim Collard
Planning Officer
Bromsgrove District Council

BY EMAIL ONLY



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

T 0300 060 3900

Dear Mr Collard

Planning Consultation:

Thank you for your consultation on the above document which was received by Natural England on 12 February 2013

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

Natural England considers that a Strategic Environmental Assessment (SEA) would be required for the Neighbourhood Plan given that the plan's objectives include the location of housing and associated infrastructure which would impact on the environment including the protected nature conservation sites (Local Wildlife Sites and Sites of Special Scientific Interest SSSI) which fall within the parish boundaries.

We would also suggest that there would be a need for a Sustainability Appraisal because of the changes that the plan may make to the environment, society and the local economy. However we understand that the need for a Sustainability Appraisal appears to be something that is recommended as good practice but not necessarily a legal requirement.

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

For any queries relating to the specific advice in this letter only please contact Roslyn Deeming on 0300 060 1524. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Roslyn Deeming
Land Use Adviser

English Heritage



ENGLISH HERITAGE

WEST MIDLANDS REGION

Mr T Collard
Strategic Planning
Bromsgrove District Council
The Council House
Burcot Lane
Bromsgrove
Worcestershire
B60 1AA

Our ref: HD/P NHP
Your ref:

Telephone 0121 625 6851
Fax 0121 625 6820

18 March 2013

Dear Mr Collard

re: **STRATEGIC ENVIRONMENTAL ASSESSMENT SCREENING REQUEST-
ALVECHURCH NEIGHBOURHOOD PLAN**

Thank you for your email of 12 February and the accompanying information on the emerging Alvechurch Neighbourhood Plan. For the purposes of such consultations, English Heritage 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.

The accompanying information with the consultation included a map of the Parish, a draft schedule of objectives (as at January 2013) and an outline sustainability issues SWOT analysis.

The draft objectives indicate that the Plan will identify areas of search for new housing, direct development to existing 'ADRs' and release greenbelt land for future development. The draft objectives also indicate the creation of a business development plan for Alvechurch village centre with options for pedestrianisation and highway changes and encouragement for farm diversification. It is unclear, however, based on the information provided how such proposals may affect the historic environment and heritage assets of the Parish, as for example the Alvechurch conservation area and the extensive scheduled monument at the Bishop's Palace immediately to the east of the town.

Moreover, the draft objectives do not include any provisions for the conservation and enhancement of the historic environment and the area's heritage assets. In this context, therefore, English Heritage considers that there is insufficient information at this stage to determine the likely impact of the Plan and any significant effects on cultural heritage.



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www.english-heritage.org.uk

Please note that English Heritage operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available

Appendix A - Responses received from Statutory Consultees – Spring 2013

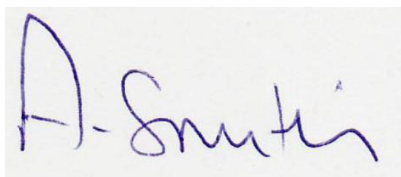
I recommend that a concise Screening Report is prepared to help inform the consultation process and the decision as to the need for a Strategic Environmental Assessment (SEA). A possible approach is that used by Madeley Parish Council, Telford and Wrekin Council. The consultation Screening Report outlined the emerging objectives for the Plan and the emerging development strategy. It also provided a short assessment against each of the criteria in Annex II of the SEA Directive. These provide the framework for helping to determine whether there are likely to be significant effects resulting from the implementation of the Plan.

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, I would be happy to forward further advice on this. English Heritage is about to publish updated guidance on Sustainability Appraisal / Strategic Environmental Assessment and the Historic Environment which is relevant to both local and neighbourhood planning.

With regard to general information on the preparation of neighbourhood plans, outlined in an Annex to this response is an extract of general advice English Heritage typically provides when consultation on area designations. In particular, it includes a series of signposts to further information including the relevant pages on our main website.

Please let me know if you require any further information or wish to discuss our comments in further detail at this stage.

Yours sincerely



Amanda Smith
Planner (West Midlands)
E-mail: amanda.smith@english-heritage.org.uk



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ANNEX: Neighbourhood Area Designation

Extract of general advice from English Heritage in response to Neighbourhood Area Consultations:

‘We would like to take the opportunity of the consultation to outline the range of support English Heritage is able to offer in relation to Neighbourhood Plans. It would be helpful if this response can be copied to the Parish Council for their information.

Research has clearly demonstrated that local people value their heritage¹ and Neighbourhood Plans are a positive way to help communities care for and enjoy the historic environment.

English Heritage is expecting that as Neighbourhood Planning Forums come to you to seek advice on preparing Neighbourhood Plans they will value guidance on how best to understand what heritage they have, as well as assistance on preparing appropriate policies to secure the conservation and enhancement of this local heritage resource.

Information held by the Council and used in the preparation of your Local Plan is often the starting point for Neighbourhood Plans. Other useful information may be available from the Historic Environment Record Centre or local environmental and amenity groups. English Heritage also publishes a wide range of relevant guidance. Links to these can be found in the appendix to this letter.

Plan preparation also offers the opportunity to harness a community’s interest in the historic environment by getting them to help add to the evidence base, perhaps by creating and or reviewing a local heritage list, inputting to the preparation of conservation area appraisals and undertaking or further deepening historic characterisation studies.

English Heritage has a statutory role in the development plan process and there is a duty on either you as the Local Planning Authority or the Neighbourhood Planning Forum to consult English Heritage on any Neighbourhood Plan where our interests are considered to be affected as well as a duty to consult us on all Neighbourhood Development Orders and Community Right to Build Orders.

English Heritage will target its limited resources efficiently. We will directly advise on proposals with the potential for major change to significant, nationally important heritage assets and their settings. Our local offices may also advise communities where they wish to engage directly with us, subject to local priorities and capacity.

English Heritage fully recognises that the neighbourhood planning process is a locally-led initiative and communities will shape their own neighbourhood plan as informed by the issues and opportunities they are most concerned about and relevant to the local area. As a national organisation we are able to draw upon our experiences of neighbourhood planning across the country and information on our website might be of initial assistance <http://www.english-heritage.org.uk/caring/get-involved/improving-your-neighbourhood/>. It is envisaged that the website will be progressively updated to share good practice in the management of the historic environment through neighbourhood planning.’

¹ English Heritage, *Heritage Counts*, 2008



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Appendix

The National Heritage List for England: a full list with descriptions of England's listed buildings: <http://list.english-heritage.org.uk>

Heritage Gateway: includes local records of historic buildings and features www.heritagegateway.org.uk

English Heritage's Advice by topic: you can search for advice on a range of issues relating to the historic environment in the Advice section of our website

Heritage Counts: facts and figures on the historic environment <http://hc.english-heritage.org.uk>

HELM (Historic Environment Local Management) provides accessible information, training and guidance to decision makers whose actions affect the historic environment. www.helm.org.uk or www.helm.org.uk/communityplanning

Heritage at Risk programme provides a picture of the health of England's built heritage alongside advice on how best to save those sites most at risk of being lost forever. <http://www.english-heritage.org.uk/caring/heritage-at-risk>

Placecheck provides a method of taking the first steps in deciding how to improve an area. <http://www.placecheck.info/>

The Building in Context Toolkit grew out of the publication 'Building in Context' published by EH and CABE in 2001. The purpose of the publication is to stimulate a high standard of design when development takes place in historically sensitive contexts. The founding principle is that all successful design solutions depend on allowing time for a thorough site analysis and character appraisal of context. <http://building-in-context.org/toolkit.html>

Knowing Your Place deals with the incorporation of local heritage within plans that rural communities are producing, <http://www.english-heritage.org.uk/publications/knowing-your-place/>

Planning for the Environment at the Neighbourhood Level produced jointly by English Heritage, Natural England, the Environment Agency and the Forestry Commission gives ideas on how to improve the local environment and sources of information. <http://publications.environment-agency.gov.uk/PDF/GEHO0212BWAZ-E-E.pdf>

Good Practice Guide for Local Heritage Listing produced by English Heritage uses good practice to support the creation and management of local heritage lists. <http://www.english-heritage.org.uk/caring/listing/local/local-designations/local-list/>

Understanding Place series describes current approaches to and applications of historic characterisation in planning together with a series of case studies <http://www.helm.org.uk/server/show/nav.19604>



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Environment Agency

Mr. Tim Collard
Bromsgrove District Council
Planning Policy
Burcot Lane
Bromsgrove
B60 1AA

Our ref: SV/2010/103997/OR-
06/IS1-L01
Your ref: 6/23.30
Date: 3 April 2013

Dear Mr. Collard

SEA/SA Requirement for Alvechurch Parish Neighbourhood Plan

Thank you for referring the above consultation, seeking our views on whether an SEA/SA is required for the Alvechurch Parish Neighbourhood plan. The consultation documents include the emerging objectives and strategic options of the plan along with a map outlining the designated neighbourhood area. We have reviewed the documents and have the following comments to assist:

Flood Risk

The plan area is part of the River Arrow catchment and as such all water flows through the parish to Redditch which has known flooding issues. The fluvial floodplain extents are shown on our Flood Zone Map, copy enclosed. The River Arrow is classified 'Main River' from its location to the east of Alvechurch downstream.

Any new development should be sited outside of Flood Zone 3 and 2, within Flood Zone 1 ('low probability') and should not increase flooding issues downstream in Redditch, in line with national planning guidance. As part of this surface water drainage proposals should be designed with sufficient attenuation, through sustainable drainage (SuDS) techniques, to maintain the existing pre-development greenfield runoff rate or betterment for brownfield sites. Overall, opportunities for flood risk betterment should be sought in line with the policy aims of the National Planning Policy Framework (NPPF) and its Technical Guidance.

In order to preserve water quality in all watercourses and to ensure that flooding problems are not created or exacerbated in any way, new drainage systems should implement SuDS techniques and be designed and installed in accordance with industry standard Ciria C697. When new development is planned it should not be sited over or close to existing culverted watercourses and the plan provides an opportunity to identify watercourse improvements, including the removal of culverts where practicable, in line with the NPPF and objectives of the Water Framework Directive (WFD).

The Neighbourhood Plan may, in certain cases, wish to promote/focus on reducing any known flooding hotspots. We would recommend that flooding is highlighted as an issue

Environment Agency
Hafren House Welshpool Road, Shelton, Shrewsbury, SY3 8BB.
Customer services line: 03708 506 506
www.environment-agency.gov.uk
Cont/d..

when the local community is engaged. All sources of flooding should be considered in producing the plan. We would recommend that you consult with the North Worcestershire Water Management Team, as the Lead Local Flood Authority, for further information on any local flooding issues and in considering all sources of flooding.

Water Quality/Ecology

Every public authority has the duty to conserve biodiversity as specified under the Natural Environment & Rural Communities Act 2006. The Neighbourhood Plan should therefore look to conserve local biodiversity assets and promote the enhancement of biodiversity in accordance with priorities specified in the Local Biodiversity Action Plan (LBAP).

The plan should look to identify important and designated sites for nature conservation ensuring these features are maintained and/or enhanced. Where a development has the potential to affect nationally designated sites or species Natural England should be contacted. We would expect Natural England to have been consulted on this SEA/SA screening opinion.

The Upper River Arrow catchment has several important conservation sites with the Bittell Reservoir complex forming a significant part of these sites, designated Site of Special Scientific Interest (SSSI). Hopwood Dingle SSSI is also located within the plan area, which is a National Trust site north-east of Bittell Reservoir.

The River Arrow in this catchment has been classed as moderate ecological status under the WFD. The main issues in this part of the catchment are:

- Nutrient enrichment from phosphate
- Excess sediment/silt
- Failing invertebrates
- Sewage pollution from septic tanks

Run-off from the adjacent land and brownfield development in the Barnt Green and Longbridge area has historically caused problems to the catchment. Phosphate levels have been an issue at Bittell Reservoir since the 1990's and the site is currently failing its SSSI status due to poor water quality and aquatic macrophytes. Bittell Reservoir is a significant source of the River Arrow and therefore any problems at this site can quickly spread further downstream. Development should consider WFD status to ensure no deterioration and to assist in achieving 'good status' by 2027 in surface waters, groundwater and protected areas, in line with the objectives of the WFD.

As part of the plan we would wish to see the river habitat corridor maintained and improved with the aim of restoring natural features alongside and within the watercourse. Where practicable, this could incorporate the removal of barriers to fish passage. River shading should be taken into consideration through tree planting along watercourses, thus helping to control water temperature as a climate change adaptation strategy. Woodland grant schemes are available. Again, the use of SuDS techniques such as the creation of retention ponds, vegetated swales, wetlands and reed beds where appropriate, will not only provide for drainage and flood storage but can create biodiversity and water quality benefits, in addition to enhancing the aesthetics and therefore improving well-being.

The north of the plan area is considered particularly sensitive, as there are numerous sites of significant ecological importance and it is used for water abstraction purposes (see groundwater vulnerability section below). Any development would need to take

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2

these issues into account to ensure that the plan does not put the area at risk or negatively impact its WFD status. Any work close to the Bittell reservoir complex should provide an appropriate level of surface water treatment through SuDS. Additionally, some of the area is not on a foul sewer network and sewage pollutions from septic tanks are common, particularly in the Hopwood area. Investment in first time sewerage should be discussed as an option early on with Severn Trent Water Ltd. Should non-mains drainage be required, proposals should be sustainable and appropriate in protecting the water environment.

In general, the plan should incorporate a holistic view at a local landscape level to improve, enhance and create habitat sites to make "more, bigger, better and joined" landscapes for wildlife as specified in 'Making Space for Nature: A review of England's Wildlife Sites and Ecological Networks by John Lawton. Planning at this level can help to create a more resilient ecological network for the future and to prevent fragmentation of important wildlife sites and their corridors.

There is an opportunity to encourage environmentally and wildlife friendly farming practices through environmental stewardships, incorporating buffer zones, fencing to prevent livestock poaching and creating silt traps near watercourses. This will help to prevent run-off and sediments degrading the watercourses.

The plan could encourage the local community to create 'friends of' groups, to work in partnerships with the local Wildlife Trust to manage and enhance important urban green spaces as their own. These groups can apply for various community funding opportunities to enhance and improve their local green space, benefiting people and wildlife.

Groundwater Vulnerability/Contaminated Land

The area of Alvechurch Parish is predominantly green belt land and located on Mercia Mudstone, which is classed as a low sensitivity Secondary B Aquifer and not particularly vulnerable. Further west towards Bromsgrove the geology changes into Sherwood Sandstone strata, which is a Principal Aquifer and much more valuable in terms of groundwater resource. As a result, Severn Trent Water Ltd. has got public water abstractions in the area further to the west (e.g. Brockhill pumping station in Tutnall, some 3km to the south-west of Alvechurch and some boreholes at Burcott too, at some 4km westerly). Within the plan area there are groundwater Source Protection Zones (SPZs) in Hopwood for public water abstraction, categorised as Zones 1, 2 and 3, which would restrict certain activities, particularly when it comes to the Inner SPZ (1). Further guidance on activities within SPZ1 (and topics including: brownfield regeneration, cemeteries, sewage works, groundwater flooding, sustainable drainage, waste storage, fuel storage, groundwater resources, agricultural disposals, ground source heat pumps etc.) is set out in our Groundwater Protection: Principles and Practice document (GP3), available via: <http://www.environment-agency.gov.uk/research/library/publications/144346.aspx>

It is essential that these principles are adhered to where relevant when it comes to detailed proposals being produced.

Also, there is useful guidance for the redevelopment of land in the form of the procedures set out in the NPPF and in CLR11 – Model Procedures for the Management of Contamination. This would include assessing the suitability of sites for redevelopment based on their environmental setting, as well as previous site history and potential for contamination to be present and the best ways to mitigate any risks to Controlled Waters shown i.e. there are a number of historic waste pits located within the plan area.

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3

Sustainable Development

We acknowledge the emerging objectives refer to sustainable development. Your Council's Outline Water Cycle Study (WCS) by MWH Ltd and emerging Local Plan picks up local water resource issues and the need for water efficiency as part of sustainable development. We would advise consideration of water efficiency techniques within the design of dwellings, with reference to the Code for Sustainable Homes water efficiency levels (such as level 3/4 for water of 105 litres per person per day). As part of sustainable development, we would also expect water efficiency techniques to be incorporated within the design of the commercial/employment buildings e.g. to BREEAM (BRE Environmental Assessment Method) very good standard or above, or alternatively the 'Good Practice' level of the AECB (Association for Environment Conscious Building) for non-residential development, which relates to water efficiency only.

Summary

In considering the emerging objectives and strategic options for the Alvechurch Neighbourhood Plan and the environmental context for the plan area, we do not consider that there would be 'significant environmental effects' as a result of the plan. The plan will need to comply with existing legislation and national policies and have regard to your Council's emerging Local Plan, which is still in draft. Notwithstanding this, the above environmental issues should be taken into consideration, along with opportunities to deliver environmental improvements through the objectives and policies of the plan.

The plan should be informed by a robust and credible evidence base to ensure that its policies and broad site allocations are justified and effective. Reference should be made to your Council's WCS work by Royal Haskoning and MWH Ltd, which may need to be updated to inform the plan.

I trust the above comments are of use at this time.

Yours sincerely

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4