

THUNDRIDGE



PARISH COUNCIL

THUNDRIDGE NEIGHBOURHOOD PLAN

2018 – 2033

Draft Submission Version
SEA Screening Report
Govresources Ltd



1. INTRODUCTION

This report sets out a draft screening determination for the Thundridge Neighbourhood Plan (hereinafter referred to as the Neighbourhood Plan) which has been written by Govresources Ltd.

The Neighbourhood Plan has been prepared for Thundridge Parish Council (as the accountable body) for the Thundridge Neighbourhood Plan Area (agreed by East Herts Council on 5th September 2017), which encompasses most of the Parish of Thundridge. It will guide the future evolution of the villages and hamlets and help inform planning decision to 2033 and beyond.

The intention of the screening report is to determine whether the Neighbourhood Plan is likely to have any significant environment effects and so require a Strategic Environmental Assessment (SEA).

More detail is given in the following sections on Legislative Background (section 2), Establishing a Need for an SEA (section 3), and Thundridge Neighbourhood Plan (Section 4).

2. LEGISLATIVE BACKGROUND

The European Union Directive 2001/42/EC requires an SEA to be carried out for certain types of plans and programmes that could have significant environmental effects. The Environmental Assessment of Plans and Programmes Regulations 2004 (the Regulations) transposed this Directive in law for England and Wales.

Neighbourhood plans fall within the scope of this legislation. They are a plan as defined by Article 3(2) of the SEA Directive and Regulation 5 paragraph 2 of the Environmental Assessment of Plans and Programmes Regulations 2004.

Under Article 3(2) of the SEA Directive and Regulation 5 paragraph 6 of the Regulations, Strategic Environmental Assessment (SEA) is only required for documents that determine land use in small areas at the local level where it is considered that they are likely to have 'significant environmental effects'.

The Conservation of Habitats and Species Regulations 2010 (as amended in 2012) transpose the requirements of the European Habitats Directive 92/43/EEC into English law. The Habitats Directive and Conservation of Habitats and Species Regulations afford protection to plants, animals and habitats that are rare and vulnerable in a European context.

Habitats Regulations Assessment (HRA) is a systematic process through which the performance of a plan or project can be assessed for its likely impact on the integrity of a European Site (European Sites, also referred to as Natura 2000

sites, consist of Special Protection Areas (SPA), Special Areas of Conservation (SAC); Potential Special Protection Areas and candidate Special Areas of Conservation (pSPA and cSAC); and listed or proposed Ramsar sites). Under Regulation 9 of the Regulations (2004), the responsible body (local parish or town council or neighbourhood forum) is required to determine whether a plan or programme is likely to have ‘significant environmental effects’. This assessment is carried out through a screening determination, using a specified set of criteria (set out in Schedule 1 of the Regulations). In accordance with the Regulations, the results of the screening process are set out in this SEA Screening Determination report, which must be publicly available, submitted with the Neighbourhood Plan proposal and made available to the independent examiner.

Paragraph 177 of the National Planning Policy Framework (NPPF) 2019 states that “The presumption in favour of sustainable development does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects), unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site”. According to the NPPF, a habitats site is “Any site which would be included within the definition at regulation 8 of the Conservation of Habitats and Species Regulations 2017 for the purpose of those regulations, including candidate Special Areas of Conservation, Sites of Community Importance, Special Areas of Conservation, Special Protection Areas and any relevant Marine Sites” (p.67).

3. ESTABLISHING A NEED FOR AN SEA OF THUNDRIDGE NEIGHBOURHOOD PLAN

Planning Practice Guidance states that “*to decide whether a draft neighbourhood plan might have significant environmental effects, it must be assessed (screened) at an early stage of the plan’s preparation according to the requirements set out in regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004*”¹ .

The Guidance also suggests that the “*The local planning authority, as part of its duty to advise or assist, should consider putting in place processes to determine whether the proposed Neighbourhood Plan will require a strategic environmental assessment.*”²In this case East Herts District Council (EHDC) as the responsible authority will provide assistance by seeking the opinions of the three statutory consultation bodies in undertaking the screening determination.

¹Paragraph: 028 Reference ID: 11-028-20150209

² ibid

The Guidance notes that as a general rule, an SEA is more likely to be necessary if:

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

Thundridge Neighbourhood Plan has been assessed in accordance with the criteria outlined in Schedule 1 of the SEA Regulations, taking into account the Planning Practice Guidance in reaching its conclusions.

The three statutory environmental bodies designated in the regulations (Historic England, the Environment Agency & Natural England) have been consulted at the pre-submission consultation stage of the Neighbourhood Plan’s preparation. Of the three, only Historic England and the Environment Agency responded to the consultation. Further details can be found in section 6.

4. THUNDRIDGE NEIGHBOURHOOD PLAN

Thundridge Parish is located in the East Herts District of Hertfordshire and to the north of Ware and Hertford. According to the 2011 census, the population of the Parish was 1,406 and there were 578 households in the village.

The Parish of Thundridge has a rich history. The village of Thundridge emerged as a result of trade from passing travellers and has ties to the medieval period. Wadesmill village was the site of the first turnpike gate in England and it is where Thomas Clarkson campaigned against slavery. Historically, High Cross is associated with the servicing of travellers on the London to Cambridge Road.

Furthermore, Thundridge has many designated heritage assets. According to the National Heritage List for England, a total of 82 heritage sites have been identified in Thundridge. These sites include:

- Nine Grade II* listed buildings, for example St Mary and All Saints Church
- A Grade II* listed park and garden (Youngsbury)
- 63 Grade II listed buildings, including for example the Granary at Sawtrees Farm and Wadesmill Bridge over the River Rib
- One locally listed park, Poles park
- Three scheduled monuments
- The Thundridge & Wadesmill Conservation Area.

All of these sites are an integral part of Thundridge and the Neighbourhood Plan and policies have been written specifically to take into account these assets.

The Neighbourhood Plan does allocate sites for housing development; T19 and T23 are the chosen sites. T19 is a garden located at the rear of number 20 Poplar Close. The 0.05 hectare site has the potential to accommodate one property. T23 is located on land previously occupied by Local Authority greenhouses, which is situated off North Drive. The 0.7 hectare site has the potential to accommodate up to 17 properties. Both of these sites are located in High Cross. This is discussed in further detail in Section 5.

The Neighbourhood Plan does not contain or border any sensitive sites of European significance (Natura 2000) or any of the sensitive areas identified in the Environment Impact Assessment (EIA) Regulations i.e. Areas of Outstanding National Beauty (AONB), World Heritage Sites and National Parks. However, there are some sensitive areas identified in the EIA. For instance, within its boundary, there are three scheduled monuments and 2 listed Historic Parks and Gardens. There are also 15 non-statutory designated Local Wildlife Sites, 8 Ancient Woodlands and Downfield Pit Site of Special Scientific Interest (SSSI) located on Poles Lane. The River Rib, a rare chalk stream, also runs through the parish. There is a conservation area encompassing the central areas of Thundridge and Wadesmill villages. High Cross Village centre may also be designated as a conservation area following a report by BEAMS and the inclusion of the area on a long list of potential conservation areas held by East Herts Council.

The Neighbourhood Plan's overall approach is to support development that protects the character of the parish and the environment.

The vision of the Neighbourhood Plan is as follows:

"The Thundridge Neighbourhood Plan will guide the future development and evolution of the villages and hamlets of our rural parish over the next 15 years and retain its separation from the town of Ware. It will conserve the traditional and tranquil character of the Parish and be inspirational in planning its future and so ensuring an attractive, safe, sociable and sustainable community in which to live and work."

The Neighbourhood Plan contains 13 sustainable objectives to:

- a. Preserve and enhance the character of the built environment in the villages and recognise the significance of heritage assets including landscapes, conservation areas, listed buildings and other historic features
- b. Maintain important views and provide extra protection for the most special green spaces, green corridors and local wildlife areas for future generations to enjoy
- c. Mitigate against the impact of climate change and promote the use of renewable energy in new development, by encouraging retrofitting of existing properties to reduce the environmental impact of an increasing number of residents in the parish

- d. Develop and expand existing facilities in a sustainable manner, making better use of green spaces and protecting assets of community value
- e. Encourage visitors to the parish's many historically important sites of interest
- f. Maintain existing businesses by providing what they need to stay within the parish
- g. Provide better car parking facilities to reduce the amount of on-street parking throughout Thundridge, Wadesmill and High Cross
- h. Manage the effects of increased traffic through the parish and encourage the provision of sustainable transport
- i. Protect and enhance the designated Green Belt in the parish
- j. Ensure that housing growth is organic, in accordance with locally-defined needs
- k. Provide a mix of housing types, including smaller units for older people, and starter homes for young people
- l. Enable small infill developments in pockets of land that can accommodate it sympathetically
- m. Ensure that new development is built to a high standard of design which reinforces local distinctiveness and character

5. SITE ALLOCATION ASSESSMENT

The Neighbourhood Plan contains two housing site allocations, in High Cross:

Site 1: Garden at Popular Close, High Cross - provision of 1 dwelling

Site 2: The Greenhouses Site, Off North Drive, High Cross - provision of up to 17 dwellings.

Appendix A shows both site allocations in relation to the environmental assets on and around the sites and should be referred to when reading the assessments below.

Site 1 - Garden at Poplar Close, High Cross (T19)

Housing site T19 is allocated for the provision of a small development of 1 dwelling. The site is located in a residential area within the village boundary so will blend in with its surroundings.

Access would be from the rear off North Drive. Other homes are currently already accessed off this road. The length of North Drive is not an adopted road. However, the unmade road currently serves in excess of 60 homes with services.

Housing site T19 was subjected to a Housing Site Assessment which yielded an overall score of 171, one of the highest scores given to all the tested sites in the Neighbourhood Plan Area. The score indicates that the development of this site will be compatible with the needs of the surrounding area and will constitute organic growth of the village.

A number of designated heritage assets have been identified near the site. These include 16 Grade II and II* listed buildings, the grade II* listed Youngsbury park and garden. The score obtained by T19 indicates that the provision of a single dwelling on the site will not result in harm to, or loss of, the significance of these designated heritage assets. If the aspiration of a conservation area designation for the centre of High Cross village is realised, the character and appearance of that conservation area will be preserved by virtue of site T19 being a significant distance from the likely eastern boundary of the conservation area.

Housing site T19 is colour-coded orange on the Herts Ecological Networks Map. This colour indicates that the site is suitable for appropriate development as it contains no mapped existing habitats of any significance. The colour code also suggests that development on this site 'will need to plan the most sensitively and produce the greatest enhancements to the ecological network' (Herts Environment Records Centre, p3 second bullet).

The Neighbourhood Plan includes policies which address the need to preserve and maintain ecological networks. Policy THE7 - Conserve and Enhance Biodiversity is designed to promote the conservation and enhancement of biodiversity and to prevent development from causing significant harm to local wildlife sites, setting a requirement to seek secure appropriate management regimes if planning permission is granted with development conditions or planning obligations.

Policy THE8 - Green Corridors and the River Rib states that networks of biodiversity and public access will be protected from the impact of harmful development. The Neighbourhood Plan seeks to put in place preparative measures which will ensure that the environment is not negatively impacted or effected.

To conclude, the provisions made in the Neighbourhood Plan will ensure that a housing development on site T19 will not have significant environmental effects on the surrounding landscape character or put any pressure on the existing environment.

Site 2 - The Greenhouses Site, Off North Drive, High Cross (T23)

Housing site T23 is allocated to accommodate around 17 dwellings. It was given a score of 129 in the Housing Site Assessment and is located within the village boundary.

Access will be from North Drive at the same point as access for site T19.

The site is colour-coded orange with a green small green area on the Herts Ecological Networks Map. The green colour code indicates that site T23 contains habitats listed within S41 of the NERC Act 2006 and that the site should be avoided by development and protected by the planning system through the development management process.

According to the Herts Environment Records Centre part of the area covered by T23 is a plantation woodland which needs to be maintained and enhanced. Having assessed the site on the ground, Govresources contacted Herts and Middlesex

Wildlife Trust (Environmental Records Centre) to query the designation of the site as S41 habitat. In discussion with the Trust it was established that much of their survey work was conducted using aerial photography and following the submission, by Govresources, of a photograph, it was agreed that the site, which contains rubble and the remains of the previous greenhouses used by the Local Authority, the green coding was not relevant in this instance.

T23 is close to the periphery of the most northern extremity of Youngsbury, a grade II* listed historic park and garden, which borders North Drive on the southern (opposite side) of the road to this site. However, the development of T23 will be screened from the park by existing properties on North Drive.

Although the site is on the edge of the village, it is within the village envelope. The land immediately to the east of the site is farmed by Home Farm. This narrow strip of arable land borders the A10 road.

The nearest listed buildings to the site are The Rectory located 230m to the west, and Youngsbury located 550m to the south east. The development of T23 will not impact these designated heritage assets or any identified non-designated heritage assets identified in the Neighbourhood Plan.

The site does contain some biodiversity by virtue of vegetation overtaking the abandoned greenhouses. The revised policy for the housing site allocation THH4 now includes an additional criterion "(g) the habitat values of the area of scrub be assessed so that a net gain in biodiversity on the site is achieved." There are also general policies in the Neighbourhood Plan that support the preservation and maintenance of ecological networks and corridors. Policy THE7 sets a requirement to apply a mitigation hierarchy when developing a site listed in Section 41 of the NERC Act. Under this policy, should planning permission be granted for development, appropriate management regimes will be sought.

To conclude, compliance with the provisions made in the Neighbourhood Plan will result in a housing development that does not significantly impact heritage assets or result in any significant environmental effects, either on the Greenhouses Site itself or on its surroundings.

6. SCREENING ASSESSMENT

As mentioned above, the Regulations specify a set of criteria against which the likely environmental effects of any plan or proposal must be assessed, to determine whether it requires an SEA. The table in Appendix B below considers each of these criteria in turn, showing that if there are any significant environmental effects arising from policies or proposals in the Neighbourhood Plan, they will be positive effects.

7. CONSULTATION RESPONSES TO THE PRE-SUBMISSION NEIGHBOURHOOD PLAN

The Environment Agency's response to the consultation highlighted that there are Flood Zones 2, 3a and 3b within the Neighbourhood Plan Area, which are associated with the floodplain of the River Rib and its tributaries and that Thundridge Parish is located within a Source Protection Zone 2, where groundwater is vulnerable. The Neighbourhood Plan policies have, as a result, been designed to ensure that development in Flood Zones 2 and 3a is avoided where possible and to ensure that no development is allowed in Flood Zone 3b unless it is essential development and it is compatible with the purpose of safely storing floodwater.

The Environment Agency said that they strongly support Policy THE8 Green Corridors and the River Rib because it aims to protect and enhance the conservation value of the River Rib. The issue of groundwater is covered in District Plan Policy WAT2.

Historic England have noted that the Neighbourhood Plan Area contains several designated heritage assets. They have not identified a need to be involved in the detailed development of the strategy for the Neighbourhood Plan Area. The general advice and guidance that they have provided has been taken into consideration in the making of this Neighbourhood Plan.

No response was received from Natural England.

8. SCREENING DETERMINATION

In conclusion, the Thundridge Neighbourhood Plan is not likely to have significant environmental effects and therefore an SEA is not required. The main reasons for this conclusion are:

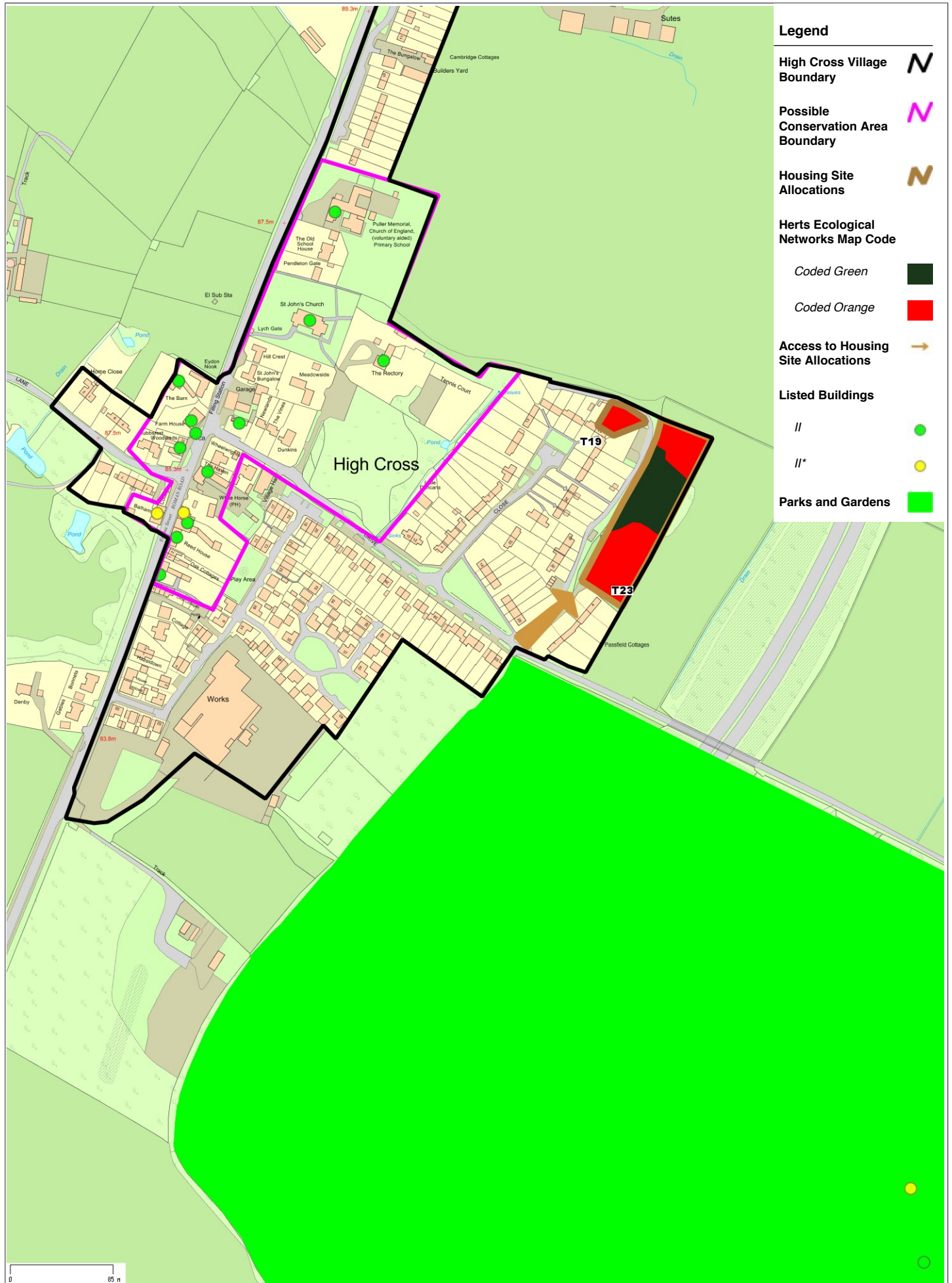
The two sites allocated for housing development in the Neighbourhood Plan are situated in the most sustainable locations in the Neighbourhood Plan Area, near existing housing developments which have existing infrastructure links in place. One of them (i.e. Site T19), will accommodate a single additional home.

The development of these sites will not result in the loss of designated heritage assets or harm their settings.

The development of these sites will not significantly harm the biodiversity in the Neighbourhood Plan Area so as long as it complies with the criteria set out in the Neighbourhood Plan policies to both preserve ecological networks, green corridors, and the River Rib and to implement mitigation measures.

The characteristics of the proposed housing site allocations and the Neighbourhood Plan as a whole accord with the policies contained in the East Herts District Plan 2018.

There are also no proposals in the Neighbourhood Plan which are likely to have significant environmental effects on the sensitive features, in fact, as aforementioned, key plan policies are designed to encourage good management of these features and protect them from harmful development.



Legend

- High Cross Village Boundary
- Possible Conservation Area Boundary
- Housing Site Allocations
- Herts Ecological Networks Map Code
 - Coded Green
 - Coded Orange
- Access to Housing Site Allocations
- Listed Buildings
 - II
 - II*
- Parks and Gardens

Appendix B

Table 1: Assessment of likelihood of significant effects on the environment

Criteria for determining the likely significance of effects	Likely to have significant effects?	Justification for assessment
1 (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	No	<p>The Thundridge Neighbourhood Plan will form part of the Statutory Development Plan and therefore would set a framework for future development projects in Thundridge</p> <p>The Neighbourhood Plan sits within a wider framework set out by the NPPF and the East Herts District Plan 2018. Any projects contained in the Neighbourhood Plan (within the Action Plan) are very local in nature.</p> <p>The Thundridge Neighbourhood Plan does include site allocations, identified in Section 4. However, these sites allocations were chosen on the basis that they would have minimal effects on the environment and on heritage assets.</p>
1 (b) the degree to which the plan or programme influences other plans or programmes including those in a hierarchy.	No	<p>The Neighbourhood Plan will sit below the Statutory Development Plan and provide more detailed development policies that are specific to the Neighbourhood Plan Area. The Neighbourhood Plan will respond to, rather than influence other plans and is in general conformity with the strategic policies in the District Plan.</p>
1 (c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development	No	<p>The Neighbourhood Plan contains policies that aim to protect and enhance the historic character, natural environment and landscape of the Neighbourhood Plan Area through highlighting statutory environmental designations, making Local Green Space designations and protecting non-designated sites.</p> <p>A number of policies in the Neighbourhood Plan ensure that development in Thundridge is</p>

		sustainable, as defined in the NPPF. They address key sustainability issues such as improving social welfare, creating a strong economic base through providing improved infrastructure and enriching the housing supply to ensure the needs of the present and future generations are met. Hence it is considered that the Neighbourhood Plan will have a positive impact on the environment, will promote only sustainable development and will provide an additional layer of policy protection.
1(d) environmental problems relevant to the plan	No	No problems have been identified. There will be an increase in the number of houses in the Neighbourhood Plan Area, as a result of new development on the site allocations. However, the Neighbourhood Plan will help to address wider environmental problems; the most relevant to the Neighbourhood Plan being climate change, biodiversity and preserving green spaces.
1 (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)		The Neighbourhood Plan is in conformity with the Development Plan and the NPPF. The Neighbourhood Plan is not directly relevant to the implementation of European legislation. It is likely to have a positive effect on the environment by providing more local information to potential developers and will therefore result in greater protection of the local environmental assets.
2 (a) the probability, duration, frequency and reversibility of the effects	No	No significant effects have been identified. It is considered that the Neighbourhood Plan will have positive environmental outcomes, especially as the policies aim to protect heritage assets, designate Local Green Spaces and identify important views. The policies are designed to have long term positive impacts.
2 (b) the cumulative nature of the effects	No	No significant effects have been identified A combination of the Neighbourhood Plan, which contains policies which seek to protect and enhance the historic character, environment and landscape of Thundridge Parish and wider Environmental policy in the East Herts District Plan 2018 is likely to have cumulative positive

Thundridge Neighbourhood Plan SEA Screening MAY 2019

		environmental effects and benefits for the Neighbourhood Plan Area.
2 (c) the trans-boundary nature of the effects	No	All effects will be local to the Parish of Thundridge, which covers Thundridge, Wadesmill and High Cross. There will be no impacts on neighbouring areas.
2 (d) the risks to human health or the environment (e.g. due to accidents)	No	No significant effects have been identified.
2 (e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	No	No significant effects have been identified. The Neighbourhood Plan includes policies which aim to enhance and preserve the environment.
2 (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	No	<p>The Neighbourhood Plan does contain sensitive sites including heritage assets and a Site of Scientific Interest. However, there are no policies or proposals in the Neighbourhood Plan which are likely to have negative environmental effects on these features. Instead, the Neighbourhood Plan includes policies which aim to protect and enhance the natural and historic environment from future development.</p> <p>The following specific policies protect sensitive features:</p> <p>THE1, THE2, THE3, THE4, THE5, THE7, and THE8 East Herts District Plan Policies and the NPPF will also protect the natural assets, designated and non-designated heritage assets identified in this Neighbourhood Plan.</p>
2 (g) the effects on areas or landscapes which have a recognised national, community or international protection status	No	The Neighbourhood Plan area contains one SSSI for which there are no policies or proposals that will result in significant environmental effects. There are no RAMSAR sites or NATURA 2000 sites in or adjacent to the Neighbourhood Plan Area.