

Pebworth Parish Neighbourhood Plan

Basic Conditions Statement

December 2018

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1. Legal requirements

1.1. This statement has been prepared by Pebworth Parish Steering Group on the behalf of Pebworth Parish Council to accompany its submission to Wychavon District Council of the Pebworth Parish Neighbourhood Plan under section 15 of the Neighbourhood Planning Regulations 2012.

1.2. The Neighbourhood Plan has been prepared by the Parish Council, a qualifying body, for the area covering the parish of Pebworth, as designated by Wychavon District Council on 10 April 2013.

1.3. The neighbourhood area is contiguous with the parish boundary as shown on the map accompanying the neighbourhood designation application. For clarity, the Plan area is shown at Figure 1 over leaf. There are no other neighbourhood plans in place for the Pebworth neighbourhood area.

1.4. The plan proposal relates to planning matters (the use and development of land) in the designated neighbourhood area and covers the period from 2018 to 2030.

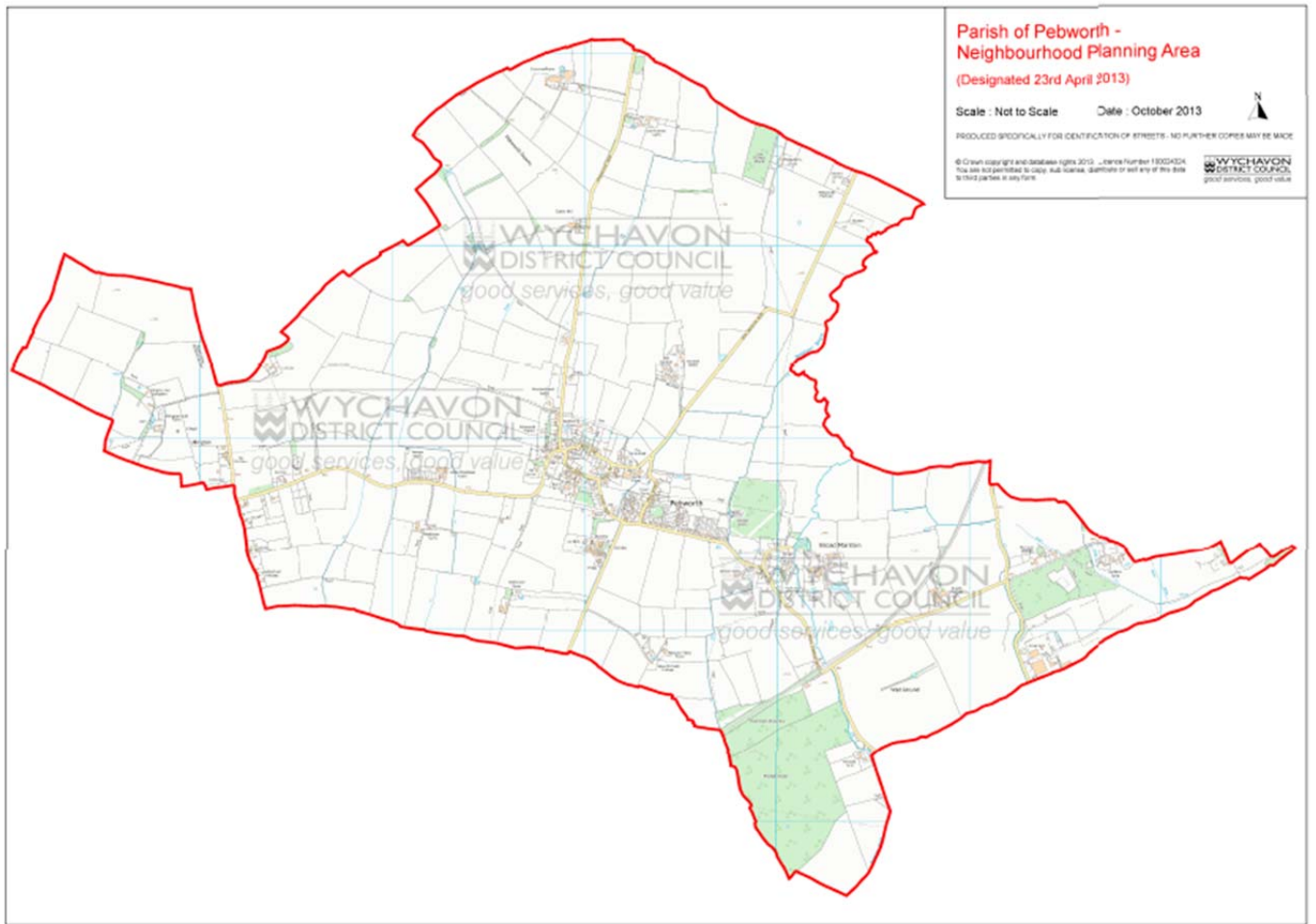
1.5. The Plan proposal does not deal with County matters (mineral extraction and waste development), nationally significant infrastructure or any other matters set out in Section 61K of the Town and Country Planning Act 1990 as 'excluded development'.

1.6. The Draft Pebworth Parish Neighbourhood Plan was made available for consultation in accordance with Regulation 14 of the Neighbourhood Plan Regulations March 2012 from 30th July 2018 to the 21st September 2018. Some amendments have been made to the document based on the comments received and these are summarised in the document entitled 'Consultation Statement' that is submitted with the Neighbourhood Plan.

1.7. The following statement will address each of the four 'basic conditions' required of the Regulations and explains how the Neighbourhood Plan meets the requirement of paragraph 8 of schedule 4B to the 1990 Town and Country Planning Act.

- 1.8. The Regulations state that the Neighbourhood Plan will have met the basic conditions if it:
- Has regard to national policies and advice contained in guidance issued by the Secretary of State;
 - Contributes to the achievement of sustainable development;
 - Is in general conformity with the strategic policies of the development plan for the area ;
 - Is compatible with European Union (EU) and European Convention on Human Right (ECHR) obligations.

Figure 1: Pebworth Neighbourhood Plan Area.
Source: Wychavon District Council 2016



2. Introduction and Background

2.1. The Parish Council commenced preparation of an earlier iteration of the Neighbourhood Plan in 2013. Unfortunately work on this plan was abandoned, due in part to a large scale development for 380 dwellings gaining approval at appeal on a site adjacent to but within the parish boundary. At the time, the group felt they could no longer proceed and were somewhat disillusioned by the process and events happening in the parish.

2.2. However, work recommenced in 2016 under the supervision of independent planning consultants, Brodie Planning Associates, who were appointed by the Parish Council to steer the process and to provide impartial professional planning advice. Early discussions included a potential change in the Neighbourhood Area boundary, but it was agreed to continue with the existing parish boundary.

2.3. The key drivers of the decision to produce a Neighbourhood Plan were the encouragement of the District Council to parishes to prepare neighbourhood plans and the local community concern over inappropriate new development in the parish. The community were keen to protect the defining characteristics of the parish including key open spaces, the rural character, heritage assets and community services, and to ensure that new development was of good design and appropriately located.

2.4. A Steering Group was formed comprising Parish Councillors and members of the local community and regular meetings were held and chaired by independent planning consultants Brodie Planning Associates. Small working groups were established for undertaking site assessments and areas of research, and matters were always brought back to the wider group to gain consensus to carry forward into the draft Plan.

2.5. Consultation was held with the wider community at key stages to gain an understanding of community issues and to ensure that the plan represented the views of the majority. This included an initial residents' questionnaire, a consultation on the vision and objectives and a site allocation options survey. More detail on community engagement is provided in the accompanying Consultation Statement.

2.6. The Parish Council has had careful regard for policies in the adopted Local Plan the South Worcestershire Development Plan (SWDP). Care has been taken not to duplicate policies already addressed in the SWDP and to where necessary add a level of local detail that is considered appropriate to the parish.

2.7. The parish is not generally regarded as a sustainable location for substantial growth in the SWDP, and is only really required to meet locally identified housing and employment need. The combination of its relative rural remoteness and of its heritage designations has shaped the Neighbourhood Plan's focus on managing development proposals through a comprehensive design policy and a housing site allocation that re-uses land that has been to all intents and purposes previously developed with glasshouses, blockwork buildings and hard surfacing covering the majority of the site.

3. Having regard to National Planning Policy

3.1. The Neighbourhood Plan has been prepared having regard to the policies set out in the National Planning Policy Framework (NPPF) of April 2012 and more recently been reconsidered against the Revised NPPF July 2018. It also gives regard to National Planning Practice Guidance (NPPG) published by the Government in April 2014 in relation to the formation of neighbourhood plans.

3.2. The NPPF provides a framework within which local communities can produce neighbourhood development plans for their area and sets out how planning should help achieve sustainable development.

3.3. The following table shows which sections of the NPPF 2012 and the Revised NPPF 2018 the Neighbourhood Plan has had regard to. Not all policies have been carried forward into the Revised NPPF 2018, some have been altered and new policies have been added. Therefore the table provides a useful overview of the relationship between the 2012 and 2018 versions.

Table 1: Sections within NPPF 2012 and the Revised NPPF 2018 that the Neighbourhood Plan has had regard to

NPPF 2012	NPPF 2018
Achieving sustainable development (para 6-17)	Achieving sustainable development (para 7-14)
Plan making (para 150-185)	Plan making (para 15-37)
Delivering a wide choice of high quality homes (para 47-55)	Delivering a sufficient supply of homes (para 59-79)
Supporting a prosperous rural economy (para 28)	Building a strong, competitive economy (para 80-84)
Promoting healthy communities (para 69-78)	Promoting healthy and safe communities (para 91-101)
Promoting sustainable transport (para 29-41)	Promoting sustainable transport (para 102-111)
	Making effective use of land (para 117-123)
Requiring good design (para 56-68)	Achieving well-designed places (para 124-132)
Meeting the challenge of climate change flooding and coastal change (para 93-108)	Meeting the challenge of climate change flooding and coastal change (para 148-169)
Conserving and enhancing the natural environment (para 109-125)	Conserving and enhancing the natural environment (para 170-183)
Conserving and enhancing the historic environment (para 126-141)	Conserving and enhancing the historic environment (para 184-202)
Annex 1: Implementation (para 208-219)	Annex 1: Implementation (para 212-217)

3.4. Table 2 sets out a summary of how each policy has regard to both the NPPF 2012 and the Revised NPPF 2018. As the Plan is being submitted before the 24 January 2019 policies in the previous Framework will apply for the purposes of examination (paragraph 214, NPPF, 2018). However, in case of any delays and to ensure the Neighbourhood Plan is up to date with the latest national policy guidance the table overleaf demonstrates how the policies are in conformity with both editions of the NPPF. The paragraphs referred to are considered to be the most relevant to the policy and are not intended to be a comprehensive list of every possible relevant paragraph.

Table 2: How the NP policies conform to the NPPF

NP Policy Number and Title	NPPF 2012 Paragraph(s)	NPPF 2018 Paragraph(s)	Comment on conformity
P1. Site Allocation Policy	7, 17, 55	8,13,28,78	<p>Conforms to the social objective of paragraph 7 (NPPF 2012) and also with paragraph 8 (NPPF 2018) – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations. There is not a great or immediate need for dwellings in the parish, a large scheme is being built on a site within, but on the edge of, the parish that will deliver 380 homes; therefore a small site is appropriate within the village of Pebworth.</p> <p>In conformity with paragraph 13 (NPPF 2018) the Neighbourhood Plan, whilst supporting the delivery of the SWDP strategic policies, takes the opportunity to “<i>shape and direct development that is outside of these strategic policies</i>” by allocating a small site for development. It is the intention that by allocating a site chosen by the community that future development in the parish will be “<i>plan led</i>” (paragraph 17, NPPF 2012).</p> <p>The allocated site will provide a small sustainable development within the settlement of Pebworth and will contribute to the vitality of this rural community, in conformity with paragraph 55 (NPPF 2012) and paragraph 78 (NPPF 2018) the Neighbourhood Plan has identified an opportunity for the village to grow and thrive in the future.</p>
P2. Housing Mix Policy	50	8, 61	<p>Conforms to paragraph 50 (NPPF 2012) addressing the need to provide housing to meet a local need for smaller dwellings and bungalows. The policy also conforms to paragraph 61 (NPPF 2018) where the size, type and tenure of housing needed for different groups in the community has been assessed and reflected in this planning policy.</p> <p>The social objective paragraph 8 (NPPF 18) – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations is also met through this policy.</p>
P3. Design Policy	7,8, 17, 56, 57, 58, 59, 60, 61,	8, 28, 91, 124, 125, 126, 127,	The Neighbourhood Plan policy is a comprehensive design policy addressing all aspects of design. Its intention is to provide clear guidance on a broad range of design matters, all of

	63, 64, 69	130, 131	<p>which need to be considered through the design process. In line with the core planning principles paragraph 17 (NPPF 2012) the policy seeks <i>“to secure high quality design and a good standard of amenity for all existing and future occupants.”</i> The policy is split into sub areas to aid the applicant and decision maker. In accordance with paragraph 124 (NPPF 2018) <i>“The creation of high quality buildings and places is fundamental to what the planning and development process should achieve.”</i> The neighbourhood Plan sets out <i>“a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable”</i> paragraph 125 (NPPF 2018). This policy has been created by locals taking account of the areas defining characteristics and aspirations for high quality design in the future.</p> <p>The policy has been informed by paragraph 58 (NPPF 2012) now amended to paragraph 127 (NPPF 2018). Important consideration is given to the context in which development takes place understanding the character and history of the built environment, the local materials and landscape setting, these are addressed within the sections of the policy dealing with Local Character, Siting and Layout, Detailed Design and Materials, Boundary Treatments and Landscape and the Natural Environment. However the policy does not prevent or discourage appropriate innovation or change.</p> <p>The policy seeks to maintain a strong sense of place, by encouraging applicants to reference the arrangement of streets, spaces, building types and materials in the area to create attractive, welcoming and a distinctive place to live, work and visit. It is the intention of the policy to deliver visually attractive designs and ensure that effective and appropriate landscaping is provided in this rural location. This will provide multifunctional benefits including flood mitigation, biodiversity opportunities, recreational space and visual amenity.</p> <p>The policy encourages development that is accessible with integrated pedestrian routes in accordance with paragraph 69 (NPPF 2012) and revised in paragraph 91 (NPPF 2018).</p> <p>With regard to parking, local evidence suggests there are localised issues with on street parking and maintaining access through the narrow country lanes, car ownership levels are high and access to public transport is limited therefore in conformity with paragraph 39 (NPPF2012) and paragraph 105 (NPPF 2018) the Plan sets local standards.</p>
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			The policy seeks for new buildings to be future proof and adaptable to meet occupants existing and future needs.
P4. Local Green Space Policy	76,77,78	99, 100, 101	<p>The NPPF (2012 and 2018) allows communities to identify and protect green areas of particular importance to them. A comprehensive Green Space Background Paper has been prepared to support the submission of the Neighbourhood Plan and all green spaces were assessed using the NPPF criteria and the Local Green Space designation has only been used where the green space meets the following criteria:</p> <p>“</p> <ul style="list-style-type: none"> a) <i>in reasonably close proximity to the community it serves;</i> b) <i>demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</i> c) <i>local in character and is not an extensive tract of land.”</i> <p>The policy for managing Local Green Space is consistent with Green Belt policy in its intention to maintain the openness of these spaces.</p>
P5. Protect Locally Important Views	109, 132	170, 189	The policy conforms with the purpose of paragraph 109 (NPPF 2012) replaced by paragraph 170 (NPPF 2018) to protect and enhance valued landscapes and paragraph 132 (NPPF 2012) replaced by paragraph 189 (NPPF 2018) in seeking to prevent harm to the significance of the setting of heritage assets. It identifies at a local scale key landscape and heritage-related attributes that form an essential part of the character of the parish.
P6. Footpaths	75, 109	98, 170	<p>The Neighbourhood Plan is in conformity with paragraph 75 (NPPF 2012) now paragraph 98 (NPPF 2018), as it supports and encourages the enhancement and improvement of existing footpaths, improving access to them and identifying a new connection. <i>“Planning policies and decisions should protect and enhance public rights of way and access, including taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks...”</i></p> <p>The policy also takes opportunities to ensure that biodiversity enhancements are made in</p>

			accordance with paragraph 109 (NPPF 2012) now paragraph 170 (NPPF 2018). National policy states that it is important that the planning system contributes to and enhances the natural and local environment through recognising the intrinsic character of an area its existing ecosystems, and minimises any impact on these providing net gains in biodiversity.
P.7 Protect Community Facilities	28, 70	83, 92	<p>This policy responds to paragraph 28 (NPPF 2012) now paragraph 83 (NPPF 2018) which states that neighbourhood plans should promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.</p> <p>It also aims to maintain the social, recreational and cultural facilities and services the community needs by guarding against the unnecessary loss of valued facilities and services, as stipulated by paragraph 70 (NPPF 2012) now paragraph 92 (NPPF 2018).</p>
P8. Rural Employment – Existing Buildings	28	83, 84	This policy has been developed in accordance with paragraph 28 (NPPF 2012) now paragraph 83 (NPPF 2018) where sustainable growth of rural businesses is supported through the conversion of existing buildings, allowing for the diversification of agricultural and other rural businesses, and encouraging sustainable rural tourism and leisure developments which respect the character of the countryside.
P9. Retaining Existing Employment Opportunities in the Parish	28	83, 84	This policy has been developed in accordance with paragraph 28 (NPPF 2012) now paragraph 83 (NPPF 2018) where sustainable growth of rural businesses is supported through the expansion of existing businesses. It also promotes the retention of existing businesses to maintain the vitality of this rural community.

4. General conformity with the strategic policies of the development plan

4.1. The Neighbourhood Plan has been prepared to ensure that it is in general conformity with the development plan for the area. The current development plan for the area is the adopted South Worcestershire Development Plan (SWDP) 2016-2030.

4.2. The table overleaf (Table 3) sets out how each policy is in general conformity with the SWDP 2016-2030.

Table 3: How the Neighbourhood Plan policies conform to the Local Development Plan

NP Policy Number and Title	Relevant local plan policy	Comment on conformity
P1. Site Allocation Policy	SWDP2	<p>SWDP 2F: requires that <i>“development proposals should be of an appropriate scale and type with regard to the size of the settlement.”</i> This small allocated site, on what could be reasonably assessed as previously developed land, will provide a small scale in keeping development at this gateway location into the rural settlement of Pebworth without encroaching into the open countryside or extending the established pattern of development.</p> <p>SWDP 2H is also clear that <i>“The SWDP is supportive of development proposals that are promoted through neighbourhood planning mechanisms where these proposals do not compromise the delivery of the plan’s strategic policies and proposals.”</i> The SWDP allocated site in Pebworth was completed prior to the adoption of the SWDP in 2014; allocating a further site in the Neighbourhood Plan will help to address local needs and bring forward appropriately sized dwellings to address the needs of the community. The site does not conflict with the strategic policies in the SWDP.</p> <p>Pebworth is identified as a category 3 village in the settlement hierarchy where its role is predominantly aimed at meeting locally identified housing need.</p>
P2. Housing Mix Policy	SWDP2, SWDP14, SWDP20	<p>The policy complies with policies SWDP 14 (Market Housing Mix) and SWDP 15 (Meeting Affordable Housing Needs) by specifying local needs that are especially relevant to Pebworth parish.</p> <p>It also conforms to SWDP20 (Housing to Meet the Needs of Older People) as it recognises that there is a need for bungalows to enable local residents to downsize and remain in the community. The policy adds a local requirement for the threshold to be reduced to three dwellings from five in the Local Plan to reflect the limited scale of opportunities for infill development in the parish; opportunities to provide much needed smaller homes and bungalows would be missed by setting the threshold any higher.</p>

P3. Design Policy	SWDP5, SWDP13, SWDP21, SWDP24, SWDP25, SWDP27, SWDP29, SWDP30	<p>The design policy conforms with and enhances a number of SWDP policies as it takes on a holistic approach to design. The policy ensures that the applicant and decision maker take into account the historic environment (SWDP5 and SWDP24), consider locally appropriate density (SWDP13), and provides another layer of detail to the SWDP design policy (SWDP21) addressing locally specific characteristics, including the layout of the settlement, local materials, local detailing, lighting, boundary treatments and landscaping.</p> <p>The policy also enhances the SWDP25 (Landscape Character) giving further detail on landscape character in the parish.</p> <p>The policy supports SWDP27 (Renewable and Low Carbon Energy) in its desire to reduce carbon emissions.</p> <p>The policy adds locally specific requirements to SWDP29 (Sustainable Drainage Systems) for the use of sustainable drainage techniques to achieve betterment in surface water run-off rates on both greenfield and brownfield sites when compared with the pre-development situation and to also mitigate against any increased flood risk due to evidenced flooding issues in the parish.</p> <p>The policy also encourages the use of features which contribute to the efficient use of water and prevent rainwater from entering the sewage system in accordance with SWDP30 (Water Resources, Efficiency and Treatment) and advice from Severn Trent Water.</p>
P4. Local Green Space Policy	SWDP2, SWDP38	<p>This policy is intended to complement policy SWDP 2 Part D (Development Strategy and Settlement Hierarchy) and SWDP 38 (Green Space). The SWDP seeks to retain of the open character of a significant gap at the heart of Pebworth which is integral to its historic form and layout, the Neighbourhood Plan complements this extending where appropriate the area of land designated as Local Green Space and supporting the retention of the significant gap. Locally important green spaces are identified in the Neighbourhood Plan two of which offer a range of recreational facilities.</p>
P5. Protect Locally	SWDP24, SWDP25	<p>This policy refines policies SWDP 24 (Management of the Historic Environment) and SWDP</p>

Important Views		25 (Landscape Character) by identifying at a local scale key landscape and heritage-related attributes that form an essential part of the character of the parish.
P6. Footpaths	SWDP4, SWDP22, SWDP25	This policy is intended to complement policy SWDP 4 (Moving Around South Worcestershire); SWDP 22 (Biodiversity and Geodiversity) and SWDP 25 (Landscape Character). It provides opportunities for getting around the parish on foot rather than relying on the motor car and encourages biodiversity enhancements to be made when creating, maintaining or improving footpaths. It is important that the landscape character of the area is also taken into account.
P.7 Protect Community Facilities	SWDP37	The policy refines SWDP 37 (Built Community Facilities) by identifying the specific facilities in Pebworth parish to protect.
P8. Rural Employment – Existing Buildings	SWDP12	It is a priority of the Plan to support a thriving rural economy and enable and encourage small-scale employment opportunities and appropriate agricultural development and diversification, whilst protecting sensitive locations from negative impact. This policy seeks to refine policy SWDP 12 Farm Diversification (Employment in Rural Areas part D).
P9. Retaining Existing Employment Opportunities in the Parish	SWDP12	It is important that the parish retains existing employment sites where possible. This policy seeks to refine policy SWDP 12 (Employment in Rural Areas) by retaining and supporting local economic development at existing sites.

5. Contribution to the achievement of sustainable development

5.1. A Neighbourhood plan must take into account the need to contribute to the achievement of sustainable development. This involves working to address the three strands of sustainability; economic, social and environmental.

5.2. The NPPF states in paragraph 14 (NPPF 2012) now paragraphs 10 and 11 (NPPF 2018), that a presumption in favour of sustainable development is at the heart of the NPPF.

5.3. The objectives of the Neighbourhood Plan comprise a balance of social, economic and environmental goals.

5.4. The social goals are to maintain the high quality built and natural environment in the parish whilst delivering homes that meet the needs of the parish. There is a keen desire to maintain and improve community facilities for a range of age groups and to continue to have access to green space and footpaths to enable residents to have good quality and active lifestyles.

5.5. The economic goals are to actively support a thriving rural economy that enables and encourages small-scale employment opportunities and appropriate agricultural development and diversification. Supporting and improving existing community facilities and providing a high quality environment in which to live, work and visit will also bring economic gains.

5.6. The environmental goals are to protect and enhance the natural and built environment and ensure that development recognises this in its design, layout and landscaping. It is important that environmental features including green and open spaces, footpaths and views are protected and enhanced for the benefit of future generations.

5.7. Table 4 overleaf sets out an assessment of each policy of the plan and how it impacts on each of the three strands of sustainability; economic, social and environmental.

Table 4. How the Neighbourhood Plan policies contribute to sustainable development

++ Very positive impact + positive impact 0 neutral impact - negative impact - - very negative impact

Policy Number and Title	Economic	Social	Environmental	Comment
P1. Site Allocation Policy	0	++	++	This policy has a very positive social impact by providing new homes to meet the needs of the community. Further economic and social benefits include additional support for existing community facilities to assist in making them viable, and a new footpath connection that will help to make the development easily accessible on foot and be of benefit to other residents in the parish. Encouraging high quality design at this gateway location will have a positive impact on the local built and natural environment. Environmental gains will include the provision of an attenuation pond that will alleviate flood risk in the area and biodiversity enhancements will be achieved on what is currently a site covered in concrete and built structures. These wide ranging benefits outweigh the loss of a small employment site.
P2. Housing Mix Policy	0	++	0	This policy has a social benefit by encouraging homes to meet the needs of current and future residents of Pebworth. Providing the right sort of homes will help to support community facilities for example it is important to attract young families to the parish and provide homes for older residents to downsize as this will help to create a strong, vibrant and healthy community.
P3. Design Policy	0	++	++	This policy has multiple social and environmental benefits. It aims to deliver a high quality built environment that respects its surroundings and can be adapted to the needs of current and future occupants. It ensures that the new design of new buildings reflects the distinctive character of the built forms and settlement patterns in the parish. The policy encourages native planting and opportunities to improve biodiversity, supports the prudent use of natural resources and includes measures to mitigate and adapt to climate change for example in dealing with sustainable drainage and encouraging renewable energy generation.

P4. Local Green Space Policy	0	+	++	This policy has positive social and environmental benefits in preventing the harmful and inappropriate development of valued open spaces within the parish. This will ensure the distinctive character of Pebworth is maintained for the benefit of the local community.
P5. Protect Locally Important Views	0	0	++	This policy has a positive environmental benefit in preventing development that will obstruct or otherwise harm a number of locally important views in the parish. These have been identified as they make an important contribution to defining the parish's rural and historic character.
P6. Footpaths	0	+	+	This policy has positive social and environmental benefits enabling residents and visitors to access areas on foot reducing the reliance on motor vehicles and assisting in maintaining healthy lifestyles. It also supports biodiversity enhancements and respects the natural environment.
P.7 Protect Community Facilities	++	++	0	This policy has positive social and economic benefits in protecting important community facilities from unnecessary loss, and by enabling their improvement to ensure they remain viable as community assets for the long term. Maintaining a range of high quality community facilities will also attract residents and investment from adjoining rural parishes.
P8. Rural Employment – Existing Buildings	++	+	+	This policy has positive economic and social benefits by supporting the conversion of existing rural buildings to business use to allow for diversification and small scale business opportunities. It also has environmental benefits in reusing an existing building and where possible protecting and enhancing the natural, built and historic environment.
P9. Retaining Existing Employment Opportunities in the Parish	++	+	0	This policy has positive economic and social benefits in protecting local sources of employment from unnecessary loss and enabling the improvement of their premises to ensure they remain viable for the long term.

++ Very positive impact + positive impact 0 neutral impact - negative impact - - very negative impact

6. Compatibility with EU obligations and legislation

6.1. The Neighbourhood Plan has regard to the fundamental rights and freedoms guaranteed under the European Convention on Human Rights and complies with the Human Rights Act. Considerable emphasis has been placed throughout the consultation process to ensure that no sections of the community have been isolated or excluded. Every household in the parish has received information about the Neighbourhood Plan and have had the opportunity to attend meetings, contribute to or comment on the process.

6.2. A screening opinion consultation was undertaken by Wychavon District Council in August 2018 to identify whether the Plan required a Strategic Environmental Assessment (SEA) and/ or Habitats Regulations Assessment (HRA). The screening exercise involved consultation with the statutory environmental bodies: Historic England, Natural England and the Environment Agency.

6.3. All three bodies have returned consultations which confirm they are in agreement that the Neighbourhood Plan does not require a Strategic Environmental Assessment (SEA) and/ or Habitats Regulations Assessment (HRA). The Environment Agency had raised concerns over the need for further work to be undertaken on flood risk with regard to the watercourse adjacent to the allocated site; however it has subsequently been agreed that this matter can be dealt with through a Flood Risk Statement submitted with the Plan and an enhanced policy.