



Screening Statement

Determination of the need for a Strategic Environmental Assessment (SEA)

Keele Neighbourhood Plan Screening Document

November 2023

Screening Statement

Determination of the need for a Strategic Environmental Assessment (SEA) in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 and European Directive 2001/42/EC for the Keele Neighbourhood Plan Screening Document

1. Introduction

This Screening Statement is designed to determine whether the content of the Keele Neighbourhood Plan Screening Document requires a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004.

Strategic Environmental Assessment (SEA) is the process by which environmental considerations are required to be fully integrated into the preparation of plans and programmes prior to their final adoption. SEA is a tool used internationally to improve the environmental performance of plans so that they can better contribute to sustainable development.

Establishing whether a Neighborhood Plan considers SEA is an important legal requirement. The Independent Examiner subsequently appointed to consider the Keele Neighborhood Plan will check that it meets the 'Basic Conditions' set out in the national Planning Practice Guidance (PPG). One of the Basic Conditions is whether the Neighborhood Plan is compatible with European obligations. This includes the Strategic Environmental Assessment Directive. This directive is transposed into UK law by the Environmental Assessment of Plans and Programmes Regulations (2004). A Neighborhood Plan must be compatible with European Union obligations, as incorporated into UK law, in order to be legally compliant.

In meeting these obligations, the national PPG sets out that an initial screening stage is required to establish whether a Plan is likely to have significant environmental effects. As the "responsible authority" this report sets out Newcastle-under-Lyme Borough Council's conclusions in respect of the emerging policies for the Keele Neighbourhood Plan.

2. Legislative Background

In accordance with the SEA Directive and the Environmental Assessment of Plans and Programmes Regulations (2004) (Regulation 9(1)), the Council must determine if a plan requires an environmental assessment. This process is commonly referred to as a "screening" assessment. Where the Council determines that Strategic Environmental Assessment (SEA) is not required, then the Council must, under Regulation 9(3), prepare a statement setting out the reasons for this determination. Where it is determined that proposals in a Neighbourhood Plan are likely to have significant environmental effects, the plan may require a SEA. Draft Neighbourhood Plan proposals should then be assessed to identify, describe and evaluate the likely significant environmental effects as prescribed in regulation 12 (2) and (3) of the above legislation.

In accordance with Regulation 9 of the SEA Regulations 2004, Newcastle-under-Lyme Borough Council (NuLBC), as the responsible authority, will consider whether an

environmental assessment of the emerging Keele Neighbourhood Plan is required due to significant environmental effects.

Whether a Neighbourhood Plan requires an SEA, and if so, the level of detail needed, will depend on what is proposed in the Plan. The national Planning Policy Guidance (PPG) suggests that an SEA may be required, 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; and
- The Neighbourhood Plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Council's Local Plan.

It remains the responsibility of the Local Planning Authority to ensure that all the regulations appropriate to the nature and scope of a Neighbourhood Plan proposal submitted to it have been met for the proposal to progress. However, it remains the qualifying body's responsibility to make every effort to ensure the resultant draft Neighbourhood Plan that it submits to the Local Planning Authority:

- Meets each of the basic conditions;
- Has been prepared in accordance with the correct process and all those required to be consulted have been;
- Is accompanied by all the required documents.

3. Keele Neighbourhood Plan Screening Document

The Keele Neighbourhood Plan Screening Document presents a subset of aims seeking to encourage appropriate and sustainable development whilst protecting the rural character of the neighbourhood plan area (Keele parish). The key topics covered by policies are summarised below:

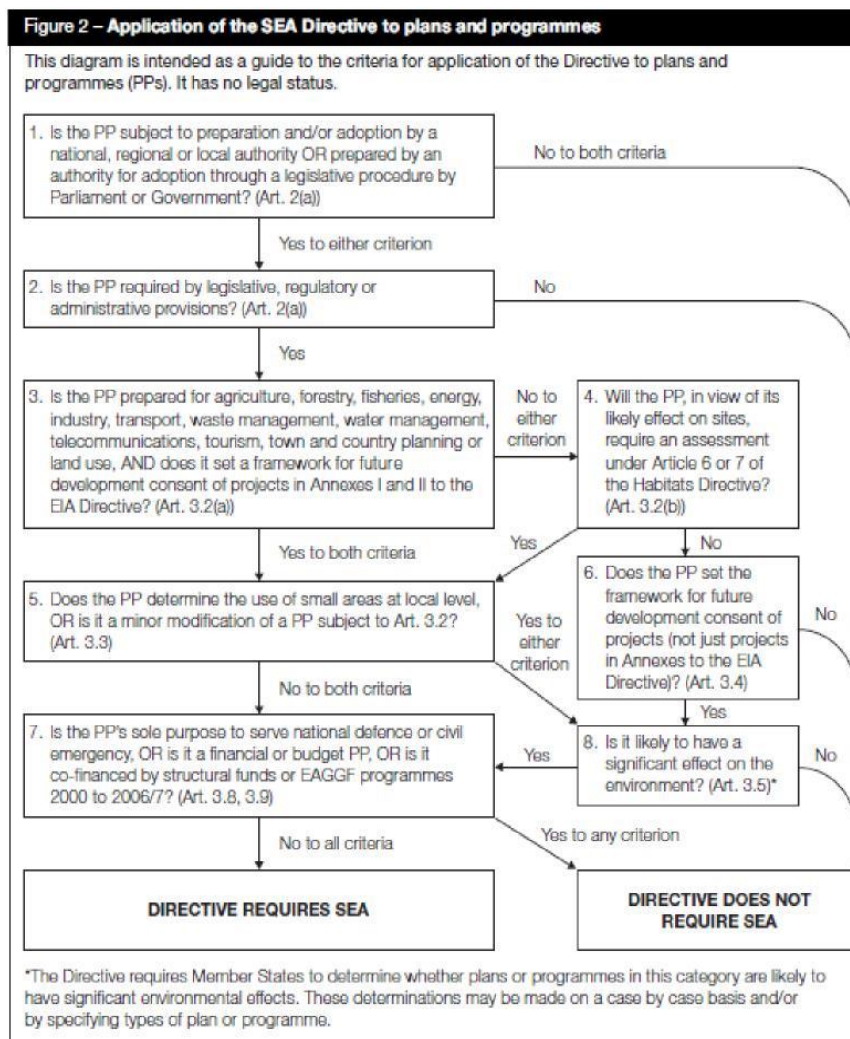
- **Housing**
 - KHG1: Residential Mix
 - KHG2: Affordable Residential Provision
- **Local Employment and Community Facilities**
 - KEF1: Employment
 - KEF2: Broadband
 - KEF3: Community facilities
- **Design and Heritage**
 - KHD1: Sustainable Design
 - KHD2: Local Character
 - KHD3: Keele Village Conservation Area
 - KHD4: Keele Hall Conservation Area and Historic Park and Garden
 - KHD5: Infill Development
- **Countryside and Environment**
 - KCE1: Rural and Natural Environment
 - KCE2: Woodlands and Habitats
 - KCE3: Landscape Setting
 - KCE4: Local Green Space
- **Transport and Infrastructure**
 - KT11: Sustainable Transport
 - KT12: Transport Infrastructure
 - KT13: Infrastructure Priorities
- **Keele University Campus**

- KUC1: Keele University Campus

4. Strategic Environmental Assessment (SEA) Screening

The process for determining whether or not an SEA is required is called screening. The SEA screening is a two-stage process. The first part considers the Neighbourhood Plan against the SEA assessment flow chart set out in the national guidance 'A Practical Guide to the Strategic Environmental Assessment Directive' (see Figure 1 and Table 1).

Figure 1. Application of the SEA Directive to plans and programmes. Flow Chart from 'A Practical Guide to the Strategic Environmental Assessment Directive'.



Source: <https://www.gov.uk/government/publications/strategic-environmental-assessment-directive-guidance>

The second part of the assessment is required in order to answer specific questions contained in the above (Figure 1), specifically question 8, and considers whether the Neighbourhood Plan is likely to have a significant effect on the environment, using criteria drawn from the EU SEA Directive 2001/42/EC (Annex II) and Schedule 1 of the UK Environmental Assessment of Plans and Programmes Regulations 2004 (See Figure 2 and Table's 2 and 3).

Figure 2. Criteria for determining the likely significance effects to the environment.

<p>1. The characteristics of plans and programmes, having regard, in particular, to</p> <ul style="list-style-type: none">• the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources,• the degree to which the plan or programme influences other plans and programmes including those in a hierarchy,• the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development, - environmental problems relevant to the plan or programme,• the relevance of the plan or programme for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste management or water protection).
<p>2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to</p> <ul style="list-style-type: none">• the probability, duration, frequency and reversibility of the effects,• the cumulative nature of the effects,• the trans-boundary nature of the effects,• the risks to human health or the environment (e.g. due to accidents),• the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected),• the value and vulnerability of the area likely to be affected due to:• special natural characteristics or cultural heritage,• exceeded environmental quality standards or limit values,• intensive land-use,• the effects on areas or landscapes which have a recognised national, Community or international protection status.

Source: <https://www.legislation.gov.uk/uksi/2004/1633/schedule/1/made>

The regulations state that before making a determination the three statutory consultation bodies must be consulted: The Environment Agency, Natural England and Historic England. Newcastle-under-Lyme Borough Council's assessment and response in determining whether the emerging Keele Neighbourhood Plan requires an SEA is presented in Table's 1, 2 and 3.

5. Assessment and Screening of the Keele Neighbourhood Plan Screening Document

Table 1: Part 1 SEA screening. Application of the SEA Directive to plans and programmes

Establish the Need for SEA (as demonstrated in Figure 1)			
Stage		Yes / No	Reason
1	Is the PP (plan or programme) subject to preparation and /or adoption by the national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2 (a))	Yes	<p>The preparation and adoption of the Neighbourhood Plan is allowed under the Town and Country Planning Act 1990 as amended by the Localism Act 2011. The Neighbourhood Plan is being prepared by the Parish Council (as the “relevant body”) and will be “made” by Newcastle-under-Lyme Borough Council (as the responsible Authority) subject to passing an independent examination and community referendum. The preparation of Neighbourhood Plans is subject to the following regulations: The Neighbourhood Planning (General) Regulations 2012, the Neighbourhood Planning (referendums) Regulations 2012, and the Neighbourhood Planning (General) (Amendment) Regulations 2015.</p> <p>GO TO STAGE 2</p>
2	Is the PP required by legislative, regulative or administrative provisions? (Art. 2 (a))	Yes / No	<p>Whilst the Neighbourhood Plan is not a requirement of the Town and Country Planning Act as amended by the Localism Act 2011, it will be “made” and eventually form part of the Development Plan for Newcastle-under-Lyme. It is important that the screening process considers whether it is likely to have a significant environmental effects and hence whether an SEA is required under the SEA Directive.</p> <p>The strategic framework for development is set by the adopted Joint Core Spatial Strategy and the emerging Local Plan. The Neighbourhood Plan seeks to align and be in general conformity with this, where relevant to do so.</p> <p>GO TO STAGE 3</p>
3	Is the Neighbourhood Plan prepared for agriculture, forestry fisheries, energy,	Yes	<p>The Neighbourhood Plan is being prepared for town and country planning, and land use purposes for Keele.</p>

	industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, and does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art. 3.2 (a))		<p>Development management type policies are included in the Neighbourhood Plan to encourage sustainable development, economic diversity, good design, protection / enhancement of the rural built, historic and natural environment (landscapes, wildlife corridors and habitats); enhancement of green infrastructure, community services and facilities; and provide local transport infrastructure.</p> <p>GO TO STAGE 5</p>
4	Will the Neighbourhood Plan, in view of its likely effect on sites require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))	Not Applicable	<p>This Neighbourhood Plan will be screened separately on the need for Habitats Regulations Assessment.</p> <p>GO TO STAGE 5</p>
5	Does the Neighbourhood Plan determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art. 3.2? (Art. 3.3)	Yes / No	<p>The Neighbourhood Plan supports new development (residential, commercial and economic uses) within defined settlement boundaries across the designated neighbourhood area, but does not propose any specific site allocations for development across the plan area. Furthermore, the Neighbourhood Plan designates a series of Local Green Spaces/ Special Policy Areas in recognition of their open / green character and community / amenity value.</p> <p>GO TO STAGE 8</p>
6	Does the Neighbourhood Plan set the framework for future development consent of projects (not just projects in Annexes to the EIA Directive)? (Art. 3.4)	Yes	<p>Once the Neighbourhood Plan is made, it will form part of the statutory Development Plan and will be used by Newcastle-under-Lyme Borough Council to assist in the determination of planning applications. The intention is that the Neighbourhood Plan will provide a land use policy framework for future development at a local level.</p> <p>GO TO STAGE 8</p>
7	Is the Neighbourhood Plan's sole purpose to serve the national defence or civil emergency, OR it a financial or budget PP, or it is co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art. 3.8, 3.9)	Not applicable	<p>Not Applicable</p> <p>GO TO STAGE 8</p>

8	Is it is likely to have a significant effect on the environment? (Art 3.5)	Unlikely	Assessment and responses regarding this matter are presented in Table's 2 and 3 SEE TABLES 2 AND 3
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Table 2. Part 2a SEA Screening: II Application of Criteria for determining the likely significance of effects of a Neighbourhood Plan (SEA Directive Article 3(5) Annex II).

(1) Characteristics of the plan and programmes, having regard, in particular, to;		
SEA Directive Criteria Annex II	NuLBC Response	Likely environmental effect?
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;	<p>The Neighbourhood Plan would, if made, form part of the statutory Development Plan for Newcastle-under-Lyme and contribute to the local planning policy framework.</p> <p>The Neighbourhood Plan does not allocate individual sites for development, thereby providing no specific details of developable areas and scale of future development. However, policies such as residential mix (KHG1), Affordable Housing (KHG2), Infill development (KHD3) and Employment (KEF1)) include some guidance on the potential location of future development. The policies in the Neighbourhood Plan seek to support development through building conversions and infill, but aim to minimise / prevent impacts on the Green Belt, rural and historic character (e.g. Conversation Area and architectural / non-designated and designated assets) and the natural environment (landscapes, habitats and designated areas of nature conservation) as set out in policies KHD2, KHD3, KHD4 and KCE1).</p> <p>The above policies will help determine the outcome of future development proposals</p>	No
The degree to which the plan or programme influences other plans and programmes including those in a hierarchy;	<p>The Neighbourhood Plan is required to be in conformity with the National Planning Policy Framework (NPPF), and at this stage the policies of the Joint Core Spatial Strategy and 'saved' Local Plan 2011 policies. The Neighbourhood Plan should not significantly influence other plans and programmes, but may have a limited degree of influence over the formation of the future strategic policies for the emerging Local Plan.</p> <p>The Neighbourhood Plan will be made alongside the emerging higher order Local Plan and form part of the Development Plan. The Neighbourhood Plan will provide supplementary information to the Development Plan on a local scale.</p>	No
The relevance of the plan or programme	The Neighbourhood Plan includes development management themed policies seeking to ensure	No

<p>for the integration of environmental conditions in particular view to promoting sustainable development;</p>	<p>appropriate and sustainable development within defined rural settlements, with particular focus on protecting / enhancing existing environmental, historical and heritage assets (policies KHD1, KHD2, KHD3, KHD5, KCE1, KCE2, KCE3).</p> <p>Development would be subject to the policies in the NPPF, as well as the Joint Core Strategy and 'saved' Local Plan 2011 policies. The Neighbourhood Plan will look to demonstrate its policy conformity with local / national aims and policies.</p>	
<p>Environmental Problems relevant to the plan or programme;</p>	<p>Across the neighbourhood plan area there are no international / national designations. There are 3 Sites of Biological Importance (SBI), 10 Biodiversity Alert Sites (BAS), and 3 Ancient Woodland (see Appendix 1 for map of all environmental designations). All environmental designations are located outside Keele Village. The Neighbourhood Plan does not provide site specific allocations for development, therefore it difficult to determine exactly where future development will take place and where potential impacts may occur.</p> <p>Springpool Wood Site of Biological Importance partially adjoins the southern boundary of Keele University Campus - impacts are not likely to be significant.</p> <p>Within the neighbourhood area there is 1 Listed Building located within Keele Village. There are 25 Locally Listed Buildings and Structures, 3 located in the university and 15 located within Keele Village. 2 Conservation Area are designated within the ward including Keele Village (See Appendix 2 for map of all historic designations across the neighbourhood plan area). Depending on the location, new or infill development within Keele Village settlement could potentially impact on the Conservation Area and Listed / Locally Listed Buildings within the vicinity. Future development would need to take this into account.</p> <p>The Neighbourhood Plan presents specific policies seeking to preserve / enhance, and prevent harm or degradation to the natural and historical environment which contributes to the rural character of Keele neighbourhood area (policies KHD1, KHD2, KHD3, KHD5, KCE1, KCE2, KCE3). Development would be subject to the policies in the NPPF, as well as the Joint Core Strategy and saved Local Plan 2011 policies in relation to protecting / enhancing the natural and historic environment. The Neighbourhood Plan attempts to demonstrate its policy conformity with local / national aims and</p>	<p>Uncertain / unlikely</p>

	policies to conserve, protect and enhance the environment in its natural and historic form.	
The relevance of the plan or programme for the implementation of (European) community legislation on the environment (for example, plans and programmes linked to waste management or water protection;	<p>Policy KHD1 ensures adequate on site sustainable drainage as a result of development. KCE1 makes reference to 'building green' through rainwater harvesting and storage / reuse of grey water, and ensuring hard surfaces / materials are kept to a minimum and be water permeable.</p> <p>The implementation of any potential community legislation is unlikely to be significantly compromised by the Neighbourhood Plan.</p>	No

Table 3. Part 2b SEA Screening: II Application of Criteria for determining the likely significance of effects of a neighbourhood Plan (SEA Directive Article 3(5) Annex II)

(2) Characteristics of the effects and of the area likely to be affected, having regard, in particular, to;		
SEA Directive Criteria Annex II	Response	Likely environmental effect?
The probability, duration, frequency and reversibility of the effects;	<p>The Neighbourhood Plan does not allocate any specific sites for development (housing, employment etc), although it would be anticipated that future development would mainly occur within defined settlement boundaries. Because there no site allocations it is difficult to determine the long-term effects from future development, both within the settlement boundaries and across the wider area of the parish. The wider area of the parish (beyond the settlement boundaries) is designated Green Belt which offers certain protection from development.</p> <p>Future development is likely to generate CO2 emissions from increasing traffic movements, household waste, and there is the potential for pollution to Local Wildlife Sites without appropriate sustainable drainage. However, some of the above effects have the potential to be mitigated by the plans own policies that seek to promote environment protection / enhancement (policies KHD2, KHD3, KHD4 as examples)</p> <p>The potential net effects of the Neighbourhood Plan are unlikely to be significant to the wider environment, but the</p>	Unlikely

	neighbourhood plan areas environmental and historical assets need to be taken into account when considering future development.	
The cumulative nature of the effects;	<p>The Neighbourhood Plan does not allocate specific sites for development (housing, employment etc).</p> <p>Sites that may come forward (identified outside the neighbourhood plan process) for development may result in some potential cumulative impacts on the environment. This may include increase traffic flows, CO2 emissions and surface water flooding. However, given the existing natural and historical characteristics of the neighbourhood plan area alongside the policies proposed in the Neighbourhood Plan, the cumulative effects are unlikely to be considered significant for the local environment.</p>	Unlikely
The trans-boundary nature of the effects;	Future development across the neighbourhood plan area may impose some impacts to the surrounding parishes in terms of increasing traffic flows and CO2 emissions. However, it is not expected to be any significant trans-boundary effects.	Unlikely
The risk to human health or the environment (e.g. due to accidents);	<p>The Neighbourhood Plan is unlikely to pose any significant risks to human health. The Neighbourhood Plan presents policies seeking to improve human health by encouraging a good mix of housing (policy KHG1), supporting the local economy in terms of employment / office development (policy KEF1), and promoting sustainable modes of travel, enhancing accessibility via footpaths, cycle routes, public rights of ways (KT11) and open / green spaces (policy KCE4), thereby accommodating the needs of the residents.</p> <p>The Neighbourhood Plan is unlikely to pose any significant risks to the environment, although the existing Local Wildlife Sites and historical designations (Conservation Area and Listed / Locally Listed Buildings) adjoining or within settlement boundaries must be taken into account when considering future development.</p> <p>The policies proposed within the Neighbourhood Plan have the potential to mitigate any risks to human health or the</p>	Unlikely

	environment imposed by potential future development.	
The magnitude and the spatial extent of the effects (geographical area and size of the population likely to be affected);	The Neighbourhood Plan does not propose specific site allocations for development. Over the course of the plan period, the neighbourhood plan area may experience increases in population, but these effects have yet to be established through the emerging local plan and will be tested through that process.	Unlikely
The value and vulnerability of the area likely to be affected due to: <ul style="list-style-type: none"> I. Special natural characteristics or cultural heritage; II. Exceed environmental quality standards or limit values III. Intensive land use 	<p>I. The neighbourhood plan area has a number of natural and historic designations / assets. These include Biodiversity Alert Sites, Sites of Biological Importance, Conservation Area, Listed Buildings and Locally Listed Buildings and Structures. The Neighbourhood Plan presents policies to enhance / protect these designations / assets when considering future development (policies KHD3, KHD4, KHD2, KCE1)). The majority of the environmental designations are located beyond the existing settlement boundaries, with only a few adjoining them. Overall, the environmental designations would not likely to be vulnerable to significant impacts from development. Historical designations are located across the neighbourhood plan area, both within and beyond the settlement boundaries. are supportive of development within the settlement boundaries including infill. Proposed development needs to be mindful of the historical designations, particularly within Conservation area and Listed / Locally Listed Buildings. However, the Neighbourhood Plan policies offer consideration and possible mitigation (KHD3, KHD4), and the historical designations would not likely to be vulnerable to significant impacts from development.</p> <p>II. The Neighbourhood Plan is unlikely to result in exceedance of environmental quality standards, such as those relating to air, water and soil quality. It should be noted that specific measures have not identified in the neighbourhood plan's policies to mitigate the impacts of flooding (i.e. implementation of sustainable drainage systems). However, the Neighbourhood Plan's policies seeks to maintain and enhance quality standards</p>	<p>Unlikely</p> <p>Unlikely</p>

	<p>within the natural and built environment through the delivery of sustainable design, green infrastructure, sustainable transport provision, and natural / landscape maintenance (i.e. Policies KHD2, KCE3).</p> <p>III. The Neighbourhood Plan does not allocate specific sites for development, and therefore unlikely to bring forward development of an extent that would result in a significant intensification of local land use.</p>	Unlikely
The effect on areas or landscapes which have a recognised national, Community or international protected status;	<p>There are no designated landscapes within or near the neighbourhood plan area.</p> <p>The neighbourhood plan area is categorised by the following saved policies for the Newcastle-under-Lyme Local Plan 2011: Landscape Enhancement and Landscape Restoration (Policies N20 and N21). The settlements are characterised by 'landscape restoration' and the wider area is characterised by 'landscape enhancement'. Collectively these policies seek to preserve, improve and enhance the quality and character of the landscape across the neighbourhood plan area.</p>	Unlikely

6. Screening Outcome

Newcastle-under-Lyme Borough Council has concluded that the emerging Keele Neighbourhood Plan is not likely to have any significant environmental effects, and accordingly will not require a Strategic Environmental Assessment (SEA). The main reasons for this conclusion are:

- The Neighbourhood Plan seeks to align itself with the Borough Council's adopted Development Plan which includes the Newcastle-under-Lyme and Stoke-on-Trent Joint Core Strategy, and Newcastle-under-Lyme Local Plan 2011 'saved' policies. Additionally the Neighbourhood Plan is subject to a Habitats Regulations Assessment screening;
- The Neighbourhood Plan does not provide any specific site allocations for development.
- Future development could potentially have minor impacts to the natural and historical designations / assets, particularly within the Audley settlement due to the presence of the Conservation Area, Listed Buildings and Locally Listed Buildings and Structures. However, some of the effects have the potential to be mitigated by the Neighbourhood Plan's own policies which seek to promote and deliver environment protection / enhancement. As a result, it is difficult to foresee any significant environmental effects;
- The Neighbourhood Plan seeks to avoid or minimise the environmental effects of future developments, especially with impacts to the natural and historic

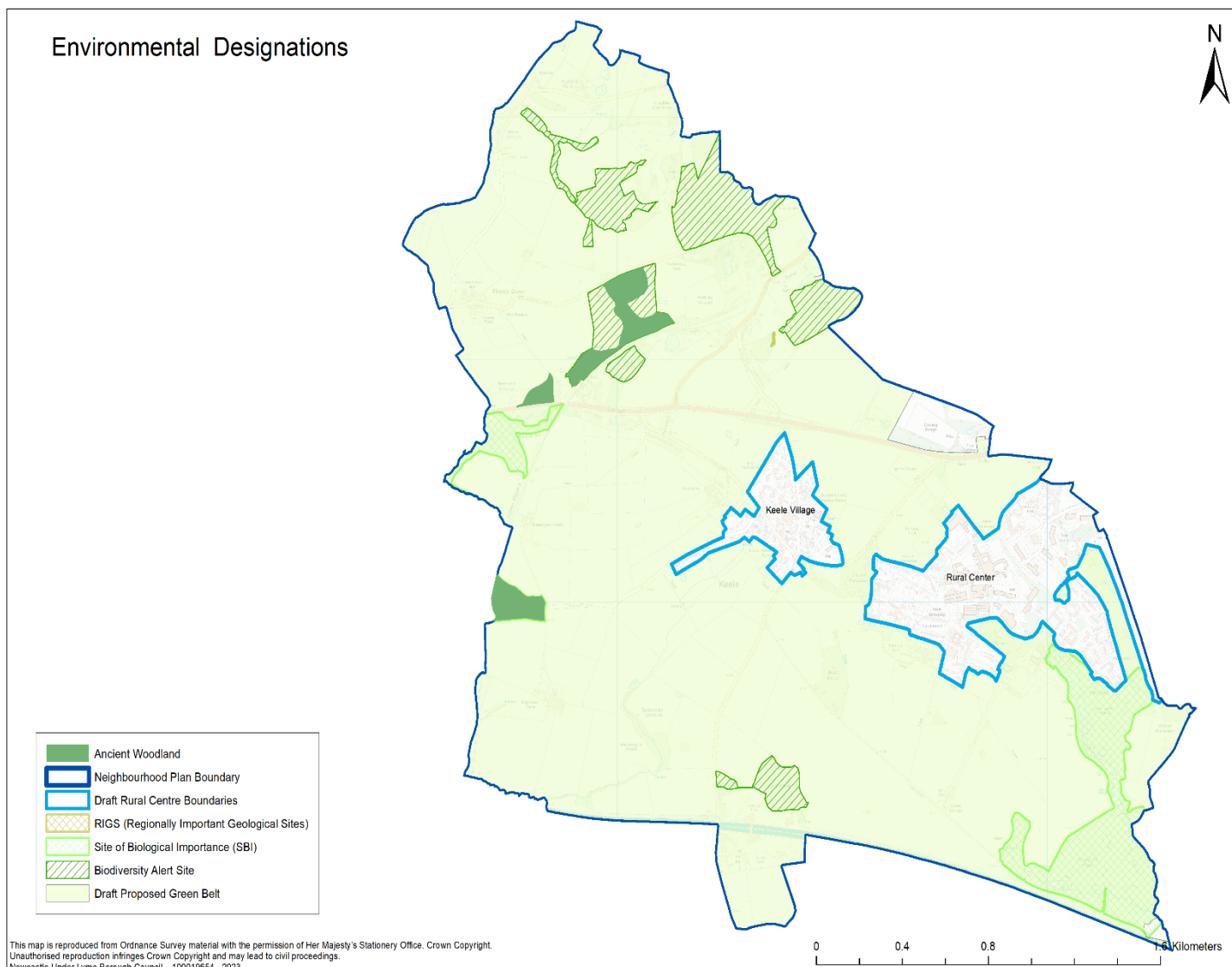
environment. It presents development management themed policies to conserve, protect and enhance environmental, historical, cultural and heritage assets for determining future development proposals;

- The spatial extent and the magnitude of the population affected are not considered significant for the purpose of the Strategic Environment Assessment (SEA);

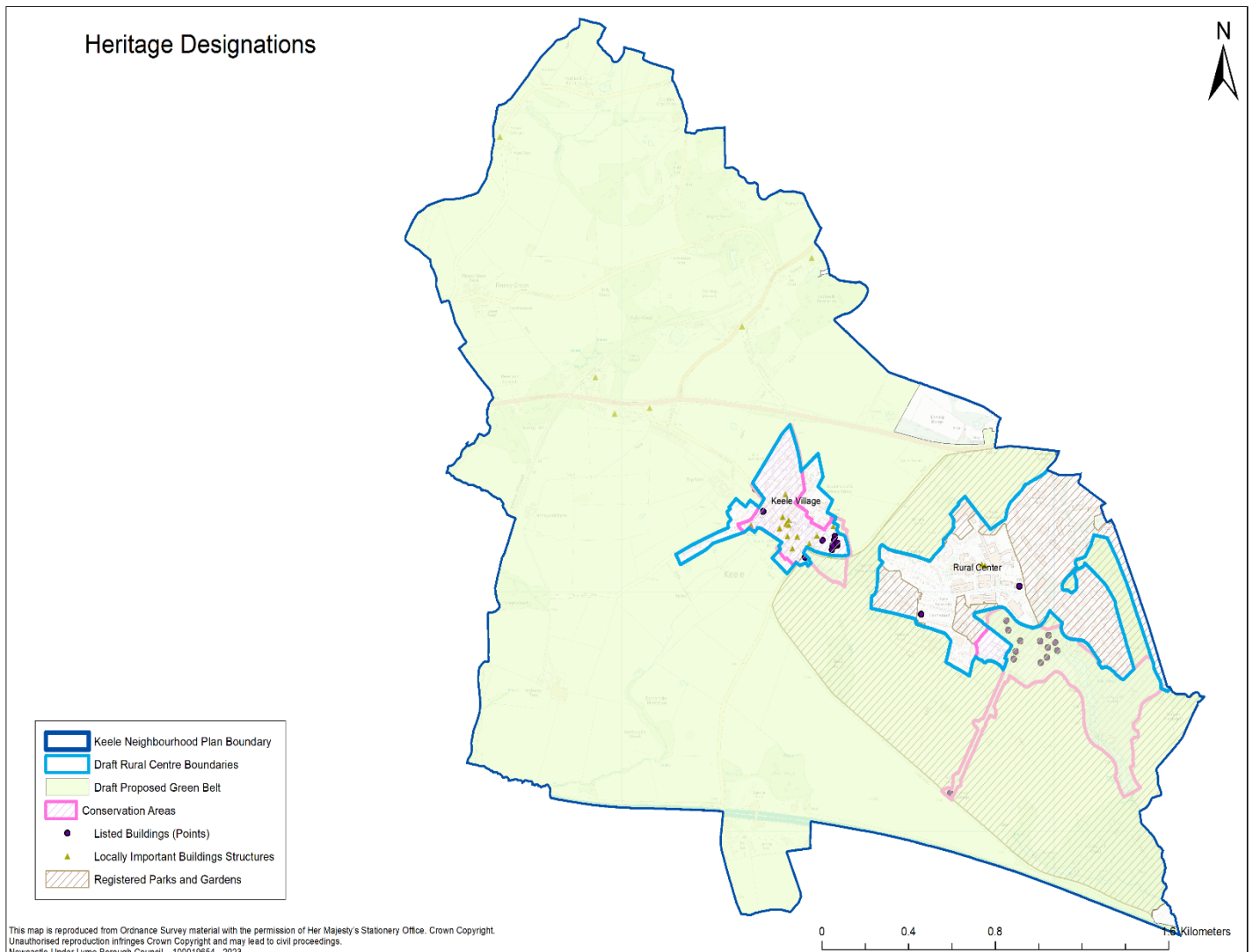
In addition to the SEA screening of the Keele Neighbourhood Plan Screening Document, there is a need to assess the likelihood of the plan having an adverse impact on internationally designated wildlife sites. The Habitats Regulations Assessment (HRA) is required by the European Habitats Directive, and screening will be undertaken for this separately.

Appendix 1: Environmental Designations, Keele

Environmental Designations



Appendix 2: Heritage Designations, Keele





Habitats Regulations Assessment

Keele Neighbourhood Plan Screening Document 2023

November 2023

HABITATS REGULATIONS ASSESSMENT (SCREENING) FOR THE KEELE NEIGHBOURHOOD PLAN SCREENING DOCUMENT 2023

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1. Introduction

- 1.1 This report will determine whether the Keele Neighbourhood Plan Screening Document 2023 requires a Habitats Regulations Assessment (HRA) in accordance with Article 6(3) and (4) of the EU Habitats Directive and with Regulation 63 of the Conservation of Habitats and Species Regulations 2017. The objective of the Habitats Directive is to protect biodiversity through the conservation of natural habitats and species of wild fauna and flora. The Directive lays down rules for the protection, management and exploitation of such habitats and species. A HRA is required when it is deemed that likely adverse significant effects may occur on protected European Sites (Natura 2000 sites) as a result of the implementation of a plan / project. Good practice suggests that sites with pathways of 10-15km of the plan / project boundary should be included with a HRA. See Table 2 and Appendix 1 for the list of sites screened as part of this assessment.
- 1.2 The purpose of the Keele Neighbourhood Plan is to guide development across the parish. It will contain land-use policies with the purpose of guiding the sustainable development of the Neighbourhood Plan area and achieve the overall vision of the Plan, which is to protect and enhance the character, features and rural setting of the parish of Keele, to ensure a sustainable and pleasant place to live that meets the needs of local people. A map of the Neighbourhood Plan area is in Neighbourhood Plan Screening Document. This HRA screening report has been undertaken on the Keele Neighbourhood Plan Screening Document which was provided by the Qualifying Body for the purposes of this report.
- 1.3 The legislative background set out in section 4 outlines the regulations that require the need for this screening exercise. Section 4, provides a screening assessment of both the likely significant effects of the implementation of the Neighbourhood Plan and the need for a Habitats Regulation Assessment.
- 1.4 A summary of findings and conclusions for the screening process can be found in section 7.

2. Information about Keele Neighbourhood Plan

- 2.1 The Keele Neighbourhood Plan has been produced to guide development within the parish of Keele. It contains land-use type policies with the purpose of guiding the sustainable development of the neighbourhood area and achieve the overall vision of the plan.
- 2.2 The draft Neighbourhood Plan policies apply to all new development, comprising development on greenfield or brownfield sites, redevelopment of existing developed sites, and conversions of existing buildings. They are organised accordingly to the policy themes of Housing, Local Employment and Community Facilities, Design and

Heritage, Countryside and Environment, Transport and Infrastructure and Keele University Campus.

- 2.3 The Neighbourhood Plan does not include a formal vision at this stage, but states purposes of each policy theme within its document.
- 2.4 If the Keele Neighbourhood Plan is successful at examination, and approved by the local community through a referendum it attains the same legal status as a Local Plan, and at this point comes into force as part of the statutory development plan. It will then be used in determining planning applications within the neighbourhood plan area. Prior to referendum it may carry some weight in planning decisions as a material consideration as an emerging plan. Paragraph 48 of the National Planning Policy Framework sets out the weight that may be given to relevant policies in emerging plans in decision taking. The referendum ensures that the community have the final say in the Neighbourhood Plan coming into force as part of the development plan.

3. Habitats Regulations Assessment Screening

- 3.1 This Habitats Regulations Assessment (HRA) screening report has been undertaken by Newcastle-under-Lyme Borough Council in respect of the Keele Neighbourhood Plan Screening Document 2023.
- 3.2 The aim of this HRA screening report is to assess whether the Keele Neighbourhood Plan Screening Document will result in any likely significant effects on any European sites within relative proximity of the neighbourhood plan area.

4. Legislative background

- 4.1 The Natura 2000 network (European sites) consists of sites across Europe designated for their nature conservation importance. These consist of:
- *Special Areas of Conservation (SACs) and potential SACs (pSACs)* - these are designated under the Habitats Directive to protect those habitat types and species that are considered to be most in need of conservation at a European level (excluding birds).
 - *Special Protection Areas (SPAs) and potential SPAs (pSPAs)* - these are designated under the Birds Directive to protect rare and vulnerable birds, and also regularly occurring migratory species.
 - *Ramsar sites* - these are wetlands of international importance designated under the Ramsar Convention.
- 4.3 The Conservation of Habitats and Species Regulations 2017 (the “Habitats Regulations 2017”) consolidate and update all the various amendments made to the Conservation of Habitats and Species Regulations 2010 (the “Habitats Regulations 2010”). They also introduce a small number of minor amendments designed to take

account of changes to other related legislation, such as amendments to Town and Country Planning legislation. The Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations 2017'), the UK's transposition of the Habitats Directive and Regulation 105, provides:

‘(1) Where a land use plan –

(a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and;

(b) is not directly connected with or necessary to the management of the site,

the plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives’.

- 4.4 This means that any proposed plan that may affect a European site (Special Area of Conservation or Special Protection Area), (also includes RAMSAR sites) must first undergo an assessment to look at its potential impacts applying the precautionary principle. This is to determine if the plan will adversely affect the integrity of the European site(s) concerned.
- 4.5 This process is known as a Habitats Regulations Assessment and the first stage considers any likely significant effects (the screening stage). An ‘appropriate assessment’ is the second stage of the HRA process and a plan should undertake this where likely significant effects are identified at the screening stage and cannot be ruled out after applying straightforward mitigation measures. An appropriate assessment looks at the implications of a plan for a European site in view of the site's conservation objectives. Furthermore, detailed mitigation measures may be introduced at the appropriate assessment stage to avoid or reduce the effects of a plan on the European site(s). Before a plan may be given effect, the plan-making authority as the competent authority must ascertain that it would not adversely affect the integrity of the European site(s).
- 4.6 In terms of Neighbourhood Plans, the Neighbourhood Planning (General) Regulations 2012 require a submitted Neighbourhood Plan to include a statement explaining how the proposed Neighbourhood Plan meets the basic conditions set out in paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990. One of these basic conditions is that the Neighbourhood Plan must be compatible with EU obligations and it is therefore necessary to demonstrate that it is not likely to have a significant effect on a European site. The screening document is being prepared at the Regulation 14 stage of the neighbourhood planning regulations 2012(as updated).

Table 1: Stages of Habitats Regulation Assessment

Stages of Habitats Regulations Assessment	
Stage 1- Screening	This stage identifies the likely impacts upon a European site of a project or plan, either alone or in combination with other projects or plans and determines whether these impacts are likely to not be significant (inconsequential), significant or whether this is uncertain.
Stage 2 - Appropriate Assessment	Where there are likely significant effects, or the effects are uncertain, the Plan should be subject to appropriate assessment. This stage considers the impacts of the plan or project on the integrity of the relevant European sites, either alone or in conjunction with other projects or plans, with respect to the sites structures and function and their conservation objectives. Where there are adverse impacts, it also includes an assessment of the potential mitigation for those impacts.
Stage 3 - Assessment of Alternative Solutions	Where adverse impacts are predicted, this stage examines alternative ways of achieving the objectives of the order that avoids adverse impacts on the integrity of European sites.
Stage 4 - Assessment Where No Alternative Solutions Exist and where Adverse Impacts Remain	This stage assesses compensatory measures where it is deemed that the project or plan should proceed for imperative reasons of overriding public interest.

5. European sites in and around the Keele Neighbourhood Plan Area

- 5.1 The first step of the screening process is to consider the European sites that could be affected by a plan. In addition to those sites located within the plan area, best practice suggests that sites occurring within 10 -15km of the area directly affected by a plan should be identified and assessed, although in some instances effects could be likely over a greater distance where pathways exist.
- 5.2 There are no European sites within the neighbourhood plan area and no likely pathways with sites over a greater distance, acknowledging that the Neighbourhood Plan covers a predominantly rural area and does not allocate specific sites for development.
- 5.3 The following sites are within 15 km of the neighbourhood plan area boundary:

Table 2: European sites within 15 km of the plan area

Site Name	Distance from plan area	Type
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Betley Mere (Midlands Meres and Mosses Phase 1)	4.9km SW	Ramsar
Black Firs & Cranberry Bog (Midlands Meres and Mosses Phase 2)	5.6 km SW	Ramsar
Wybunbury Moss (West Midlands Mosses)	9.9 km SW	Ramsar / Special Area of Conservation (SAC)
Oakhanger Moss (Midlands Meres and Mosses Phase 2)	8.3 km S	Ramsar

5.4 Further details of each of these sites can be found in Appendix 1.

6. Screening assessment of the Keele Neighbourhood Plan Screening Document

6.1 The screening assessment has had regard to the conservation objectives of the various European sites located within 15km of the plan area. Natural England's Impact Risk Zones for SSSIs which underpin the European site designations have been used to consider whether development proposed in the Neighbourhood Plan is likely to affect a European Site. It is acknowledged that Impact Risks Zones do not alter or remove the requirements to consult Natural England on other natural environment impacts or other types of development proposal under the Town and Country Planning (Development Management Procedure) (England) Order 2015 and other statutory requirements. This assessment also makes reference to other plans and projects, including the Borough Council's adopted development plan. Key questions relating to the Neighbourhood Plan are included below and along with the screening assessment, help to establish if an appropriate assessment is required.

Is the Keele Neighbourhood Plan directly connected with, or necessary to the management of a European site for nature conservation?

6.2 The Keele Neighbourhood Plan is not directly connected with, or necessary to the management of a European site, so screening for the need of a Habitats Regulations Assessment is required.

Are there any European sites within the plan area?

6.3 There are no European sites within the neighbourhood plan area.

Are there any European sites within 15km of the plan area?

6.4 Yes, there are 4 European sites within 15km of the neighbourhood plan area including 4 designated as Ramsar sites. One of Ramsar sites is also a designated Special Area of Conservation (SAC). These sites are listed in Table 2 and Appendix 1.

Does the Keele Neighbourhood Plan propose new development or allocate sites for development?

- 6.5 No, the Neighbourhood Plan does not allocate specific sites for development, but it does support and focus development towards Keele.

Are there any other projects or plans that together with the Keele Neighbourhood Plan could impact on the integrity of a European site, the 'in combination' impact?

- 6.6 No

Policy screening assessment

- 6.7 The following table reflects the findings of the screening assessment for each of the policies within the draft Keele Neighbourhood Plan Document 2023.

Table 3: Policy Assessment

Policy Number	Description	Likely significant effect identified
KHG1	Residential Mix	There are no site specific allocations for development in the Neighbourhood Plan. The policy focuses development on smaller accommodation (1-2 bedroom dwellings) to accommodate first-time buyers and the elderly population. Significant effects are unlikely.
KHG2	Affordable Residential Provision	The policy supports the provision of affordable housing in Keele with priority given to those with a local connection to Keele. Significant effects are unlikely.
KEF1	Employment	The policy is designed to support employment in existing locations, with any application outside of these locations being supported if they diversify small businesses and agricultural complexes. Significant effects are unlikely.
KEF2	Broadband	This policy ensures that all new development has the necessary infrastructure for high-speed broadband. Significant effects are unlikely.
KEF3	Community Facilities	The policy seeks to protect existing community facilities whilst also allowing diversification to make them more viable. The policy also lists local facilities which are of particular community value. Significant effects are unlikely.
KHD1	Sustainable Design	The policy encourages development to be well designed (and delivered to high standards), with sustainable urban drainage and complementary to the surrounding environment whilst considering the scale and nature of the development. Other considerations and encouragements are proposed from new development including the delivery of green infrastructure, connectivity

		(pedestrian), a clear separation between public and private space and creation of a safe environment through active frontages. Significant effects are unlikely.
KHD2	Local Character	The policy seeks to preserve and enhance the locally distinctive features of Keele (such as St John's church spire) alongside the surrounding area or setting, ensuring development takes opportunities to respond to topography, use local, recycled materials and form innovative design solutions. Significant effects are unlikely.
KHD3	Keele Village Conservation Area	The policy aims to retain and reinstate historical housing features with the use of authentic materials to ensure they are in keeping with the character of properties in Keele Conservation Area. Significant effects are unlikely.
KHD4	Keele Hall Conservation Area and Historic Park and Garden	This policy seeks to preserve the character and appearance of Keele Hall Conservation Area and Historic Park and Garden by protecting heritage assets. Significant effects are unlikely.
KHD5	Infill Development	This policy supports infill development that complements the existing townscape character and allows all dwellings to have adequate garden space and access for maintenance. It also seeks to protect light and amenity of neighbouring properties. Significant effects unlikely.
KCE1	Rural and Natural Environment	The policy seeks to preserve or enhance Keele's natural environment rural landscape with any adverse impacts on these balanced through environmental gains in the development itself. Significant effects are unlikely.
KCE2	Woodlands and Habitats	The policy lists a number of woodland areas that should be given particular regard in the application of Policy KCE1. Significant effects are unlikely.
KCE3	Landscape Setting	The policy aims to protect the open landscape setting of Keele Village and the 'Green Gap' areas that surround settlements. Significant effects are unlikely.
KCE4	Local Green Space	The policy lists a collection of Local Green Spaces and Special Policy

		Areas in the neighbourhood plan area to be formally designated as such. Furthermore, the policy aims to avoid harm and adverse impacts to these spaces as a result of development. Significant effects are unlikely.
KTI1	Sustainable Transport	This policy encourages development to be supported by sustainable transport provision and infrastructure (i.e. electric charging points, sufficient parking etc). In line with KHD1, this policy prioritises pedestrian convenience in a development. Significant effects are unlikely.
KTI2	Transport Infrastructure	The policy seeks to address traffic safety and capacity with new development, with regards to installation of traffic lights on Pepper Street. Significant effects unlikely.
KTI3	Infrastructure Priorities	This policy lists the infrastructure expenditure priorities Keele Parish Council has as guidance in the use of Section 106 and CIL contributions. Significant effects unlikely.
KUC1	Keele University Campus	The policy promotes sustainable development of Keele University campus in accordance with the University Masterplan, whilst recognising the importance of historic landscape and heritage, the preservation/ enhancement of the built and natural environment and providing appropriate parking designations. Significant effects unlikely.

In Combination Effects

6.8 Different plans and programmes can interact to produce impacts that are greater than any individual plan alone, so it is necessary to identify other plans which could lead to potentially significant 'in-combination' impacts. It is one of the 'basic conditions' that a Neighbourhood Plan has to be in 'general conformity' with the strategic policies of the development plan for the area.

6.9 The adopted development plan consists of:

- The Newcastle-under-Lyme and Stoke-on-Trent Core Spatial Strategy 2006-2026
- The 'saved policies' of the Newcastle-under-Lyme Local Plan 2011
- The Minerals Local Plan for Staffordshire Staffordshire 2015-2030

- 6.10 The neighbourhood plan area shares a boundary with the following local planning authorities and parishes:

Newcastle-under-Lyme Local Authority Area

- Madeley Parish (Neighbourhood Plan made 2022)
- Audley Parish (Neighbourhood Plan in production)
- Chapel and Hill Chorlton, Maer and Aston, and Whitmore (Neighbourhood Plan made 2019)
- Silverdale Parish Council (Neighbourhood Plan in production)

- 6.11 The following adopted / made plans have been reviewed in terms of 'in-combination' effects:

- [The Newcastle-under-Lyme and Stoke-on-Trent Core Spatial Strategy 2006-2026](#)
- [The 'saved policies' of the Newcastle-under-Lyme Local Plan 2011](#)
- [The Minerals Local Plan for Staffordshire 2015-2030.](#)
- Emerging plan: The Newcastle-under-Lyme Borough Local Plan 2020-2040
- [Madeley Neighbourhood Development Plan 2018-2037](#)
- [Betley, Balterley and Wrinehill Neighbourhood Development Plan](#)

The Newcastle-under-Lyme and Stoke-on-Trent Core Spatial Strategy 2006-2026

- 6.12 The Core Spatial Strategy was adopted in 2009 and provides a broad framework for the development of Newcastle-under-Lyme and Stoke-on-Trent. The plan (which was subject to Habitats Regulations Assessment) seeks to focus development and investment to the city and town centres, prioritising the use of previously developed land. A number of strategic sub areas are identified, with Keele being identified as a Village. Keele University and Science Park is also identified as a focus for high value business growth.
- 6.13 Policy ASP6 – Rural Area Spatial Strategy: Rural Area Spatial Policy makes provision for positive approach to rural enterprise; appropriate design policies; and preserving and enhancing conservation areas. Furthermore, the policy seeks to deliver a maximum of 900 net additional dwellings on brownfield land within defined settlement boundaries of the key Rural Service Centres. The policy seeks to invest in Keele University and Science Park to strengthen the local knowledge and skills bases and facilitate growth of high value business development thereby increasing local job opportunities in these sectors.
- 6.14 The CSS was subject to Habitats Regulations Assessment and it was concluded that there would be no likely significant effects. It is unlikely that there will be any in-combination effects arising from the CSS and Keele Neighbourhood Plan.

The 'saved policies' of the Newcastle-under-Lyme Local Plan 2011

- 6.15 The Newcastle-under-Lyme Local Plan was adopted in 2003 and a number of its policies were 'saved' beyond 2007 by the Secretary of State for Communities and Local Government. They continue to form part of the development plan for the Borough of Newcastle-under-Lyme.
- 6.16 The Local Plan sought to focus development to sustainable locations such as the defined village envelopes and to enable the appropriate re-use of rural buildings (as stated in Policy H1: Residential Development: Sustainable Location and Protection of the Countryside). It is unlikely that there will be any in-combination effects arising from Keele Neighbourhood Plan and Newcastle-under-Lyme Local Plan.

The Minerals Local Plan for Staffordshire 2015-2030.

- 6.17 The Minerals Local Plan does not allocate sites for the development of new waste facilities within the Keele neighbourhood plan area however clay (shale) is extracted at Keele Quarry. Additionally, several permissions were granted for exploration and appraisal of Coal Bed Methane (CBM), however, these have not been implemented but there is a valid permission for further exploration on at Keele University. It is unlikely that there will be any in-combination effects arising from the Keele Neighbourhood Plan and Minerals Local Plan.

Emerging plan: The Newcastle-under-Lyme Borough Local Plan 2020-2040

- 6.18 Newcastle-under-Lyme Borough Council is currently in the process of producing a standalone Local Plan for Newcastle-under-Lyme. The Borough Council consulted on a First Draft Plan in summer 2023 and is now working towards a Local Plan. The Local Plan, once adopted, will replace the existing Newcastle-under-Lyme and Stoke-on-Trent Core Spatial Strategy 2006-2026 and Newcastle-under-Lyme saved policies 2011. Given that the Local Plan is still in production, it is not possible to ascertain whether there will be any future in-combination effects. However, the emerging Local Plan will be subject to Habitats Regulations Assessment in due course, and this will have to take into account any in-combination effects.

Madeley Neighbourhood Development Plan 2018-2023

- 6.19 The Madeley Neighbourhood Development Plan was produced by Madeley Parish Council, and was formally made in May 2022. The Neighbourhood Plan's vision is to provide opportunities for residents to live rewarding and productive lives, enabling sustainable growth and development, whilst protecting the rural character and heritage of the parish. Various policies are presented to protect open / green spaces, accommodate a mix of development, promote sustainable design, protect community facilities (i.e. recreation, sports etc), protect / enhance the natural and historic environment and deliver balanced transport provision and connectivity. The Neighbourhood Plan does not allocate specific sites for development but does focus and support development within the defined settlement boundaries of Madeley and Madeley Heath. There are no European designated sites within the Madeley Parish. Given the Neighbourhood Plan does not allocate specific sites for development, directs development within existing settlement boundaries, and seeks to protect / enhance the

natural environment, it is unlikely that there will be any in-combination effects arising from the Keele Neighbourhood Plan and Madeley Neighbourhood Plan.

Chapel and Hill Chorlton, Maer and Aston, and Whitmore Neighbourhood Development Plan 2018-2023

- 6.20. The Chapel and Hill Chorlton, Maer and Aston, and Whitmore Neighbourhood Development Plan was produced by 3 Parish Councils and was formally made in October 2019. The overarching aim of the plan is to protect the rural character of the area while allowing for appropriate development. The Neighbourhood Plan does not allocate specific sites but does support development within the defined settlement boundary of Baldwin's Gate, provided the development is supported by adequate infrastructure and does not involve the loss of best and most versatile agricultural land or sensitive landscape habitats. There are no European designated sites within the Madeley Parish. Given the Neighbourhood Plan does not allocate specific sites for development, directs development within existing settlement boundaries, and seeks to protect / enhance the natural environment, it is unlikely that there will be any in-combination effects arising from the Keele Neighbourhood Plan and Chapel and Hill Chorlton, Maer and Aston, and Whitmore Neighbourhood Plan

Betley, Balterley and Wrinehill Neighbourhood Development Plan 2022-2037

- 6.24 The Betley, Balterley and Wrinehill Neighbourhood Development Plan was produced by Betley, Balterley and Wrinehill Parish Council, and was formally made in January 2022. The Neighbourhood Plan's vision is to maintain and improve the quality of life for the residents whilst protecting and enhancing the special rural character and heritage of the parish. Various policies are presented to promote sustainable development, accommodate new and existing development (housing and E use class development), and to protect and enhance the natural and historic / heritage environment. The Neighbourhood Plan does not allocate specific sites for development, but does focus and support development within the defined settlement boundary of Beltley. It is important to note that the neighbourhood area hosts 2 Ramsar sites which are as follows:

- Midland Meres and Mosses Phase 1 / Betley Mere
- Midland Meres and Mosses Phase 2 / Black Firs and Cranberry Bog

- 6.25 The protection of these environmental designations falls under Policy BBW6: Recognising the Intrinsic Character of the Countryside and Protecting and Enhancing Valued Landscapes. Their designations are referenced as justification for the creation of this policy. Given the Neighbourhood Plan does not allocated specific sites for development, directs development within the existing settlement boundary, and seeks to protect / enhance the natural environment, it is unlikely that there will be any in-combination effects arising from the Keele Neighbourhood Plan and Betley, Balterley and Wrinehill Neighbourhood Development Plan.

7. Conclusion

- 7.1 As a result of the assessment above, it is considered unlikely that any likely significant effects on European sites would occur from the implementation of the Keele Neighbourhood Plan. This is because the Neighbourhood Plan does not allocate specific sites for development and there are no logical or obvious pathways between the neighbourhood area; and the European or Ramsar Sites identified. If the plan changes, following the Regulation 14 pre submission consultation, it may be necessary to re-screen the plan. However at this stage, the Keele Neighbourhood Plan Screening Document does not require a further HRA appropriate assessment to be undertaken.

Appendix 1 European Sites within a 15km radius

European site	Midland Meres and Mosses Phase 1 Ramsar site (Betley Mere)
Distance from NP boundary	4.9 km SW
Site information and Qualifying Ramsar feature	<p>Midland Meres & Mosses (Phase 1). Comprises a series of lowland open water and peatland sites set in depressions in glacial drift left by receding ice sheets. The 16 component sites include nutrient-rich water bodies (meres), associated fringing habitats of reed swamps, fen, carr and damp pasture, and floating quaking bog (schwingmoor). The wide range of resulting habitats supports numerous rare species of plants and invertebrates. Human activities include recreation, fishing, livestock grazing, and haymaking.</p> <p>Betley Mere comprises a diverse range of habitats from open water to raised bog.</p> <p>Supports a number of rare species of plants associated with wetlands including five nationally scarce species together with an assemblage of rare wetland invertebrates (three endangered insects and five other British Red Data Book species of invertebrates)</p>
Impact Risks	The neighbourhood area does not fall within the SSSI Impact Risk Zone

European site	Midland Meres and Mosses Phase 2 Ramsar site (Black Firs & Cranberry Bog).
Distance from NP boundary	5.6 km SW
Site information and Qualifying Ramsar feature	<p>Midland Meres & Mosses (Phase 2) comprises a series of 18 sites made up of nutrient-rich open water bodies (meres) with fringing habitats of reed swamp, fen, carr and damp pasture, and peatlands. The landscape features developed in depressions in the glacial drift left by receding ice sheets. The wide range of habitats supports nationally important flora and fauna. Human activities include hunting, fishing, and research activities.</p> <p>Black Firs and Cranberry Bog comprises a diverse range of habitats from open water to raised bog and supports a number of rare species of plants associated with wetlands, including the nationally scarce cowbane <i>Cicuta virosa</i> and, elongated sedge <i>Carex elongata</i>. Also present are the nationally scarce bryophytes <i>Dicranum affine</i> and <i>Sphagnum pulchrum</i>.</p>

	Also supports an assemblage of invertebrates including several rare species. There are 16 species of British Red Data Book insect listed for this site including the following endangered species: the moth <i>Glyphipteryx lathamella</i> , the caddisfly <i>Hagenella clathrata</i> and the sawfly <i>Trichiosoma vitellinae</i> .
Impact Risks	The neighbourhood area does not fall within the SSSI Impact Risk Zone

European site	West Midlands Mosses Ramsar / SAC (Wybunbury Moss)
Distance from NP boundary	9.9 km SW
Qualifying feature	Natural dystrophic lakes and ponds (Annex I habitat). Transition mires and quaking bogs (Annex I habitat)
Conservation objectives	Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring: <ul style="list-style-type: none"> • The extent and distribution of qualifying natural habitats • The structure and function (including typical species) of qualifying natural habitats, and • The supporting processes on which qualifying natural habitats rely
Requirements to maintain favourable condition status of site	<p>Dystrophic Pools (Schwingmoor)</p> <p>Maintain present distribution of species representative of community;</p> <p>Maintain present pH range and water levels;</p> <p>Maintain sediment quality and quantity;</p> <p>Filamentous algae should be absent or at very low levels.</p> <p>Basin mire with a quaking surface (Schwingmoor): NVC types M2 and M18</p> <p>Water level and degree of fluctuation capable of sustaining the floating raft composed of NVC type appropriate to longstanding water chemistry and fertility; Maintain raft characteristics, exclude surface and drainage water likely to increase fertility; Stable groundwater, not fluctuating more than 30cm annually; Maintain type and extent of site specific NVC communities; Scrub or woodland limited to margins, or no more than scattered over open NVC communities; Maintain NVC communities: M2</p>

	Sphagnum recurvum bog pool community and M18 Erica tetralix-Sphagnum papillosum mire. Scrub not to be more than occasional; Maintain or enhance populations of special or rare plant (and animal) species.
Impact Risks	The neighbourhood area does not fall within the SSSI Impact Risk Zone

European site	West Midlands Meres and Mosses Phase 2 Ramsar site (Oakhanger Moss)
Distance from NP boundary	8.3 km S
Site Information and Qualifying Ramsar feature	<p>Midland Meres & Mosses (Phase 2) comprises a series of 18 sites made up of nutrient-rich open water bodies (meres) with fringing habitats of reed swamp, fen, carr and damp pasture, and peatlands. The landscape features developed in depressions in the glacial drift left by receding ice sheets. The wide range of habitats supports nationally important flora and fauna. Human activities include hunting, fishing, and research activities.</p> <p>Oakhanger Moss is one of the shallowest of a cluster of depressions in glacial sands lying to the west of Alsager. It is of greatest importance for the range of mire vegetation communities it supports and the way they, together with the sediment and peat deposit record, so clearly demonstrate the vegetation succession stages from open water to raised bog. The site was known to be a mere at least until the 1600s, sustained by a flow of water from Alsager Mere to the east. Since that time the basin has become completely infilled, firstly with sedge and reedswamp peat, and latterly with peat derived from Sphagnum mosses.</p> <p>The site supports four different mire communities, each of which has a well-developed shrub cover giving the site a wooded appearance. Over much of the site, in the wettest, low-lying areas associated with the few drains which cross the site, there is swamp vegetation dominated by lesser pond-sedge <i>Carex acutiformis</i>, over which willow carr, with goat willow <i>Salix caprea</i>, sallow <i>S. cinerea</i> and downy birch <i>Betula pubescens</i>, has developed. In the south-west, where inundation from the drains has less effect on water level and nutrient supply, sedges give way to purple moor-grass <i>Molinia caerulea</i> with broad buckler-fern <i>Dryopteris dilatata</i> locally, and birch displacing willow from the shrub layer. More diverse are the areas of fen which have developed along the site's eastern edge, where surface water enters the basin, and nutrient levels are at their highest. Here alder <i>Alnus glutinosa</i> and willows dominate above mature greater tussock-sedge <i>Carer paniculata</i>, with cyperus sedge <i>C. pseudocyperus</i>, marsh pennywort <i>Hydrocotyle vulgaris</i>, marsh violet <i>Viola palustris</i>, purple-loosestrife <i>Lythrum salicaria</i> and marsh cinquefoil <i>Potentilla palustris</i>, all uncommon plants in Cheshire. Similarly diverse botanically are the two distinct areas of vegetation dominated by bog moss <i>Sphagnum recurvum</i> in the centre of the site. The moss 'lawns' are noticeably higher than the surrounding communities and at times of high groundwater continue to remain free of its nutrient influence because of the buoyant properties of <i>Sphagnum</i>. This incipient raised bog community includes common cotton-grass <i>Eriophorum angustifolium</i>, cross-leaved heath <i>Erica tetralix</i>, and cranberry <i>Vaccinium oxycoccos</i>. Birch dominates the canopy which is comparatively open in character, and around the edges of the <i>Sphagnum</i> areas, in the transition to more nutrient-rich fen, alder</p>

	<p>buckthorn <i>Frangula alnus</i> becomes a common shrub with white sedge <i>Carex curta</i> and narrow buckler-fern <i>Dryopteris carthusiana</i> growing amongst the mosses. Drier perimeters of the site support a few pedunculate oaks <i>Quercus robur</i> over a bracken <i>Pteridium aquilinum</i> ground layer. The vegetation communities represented at this site, their development as recorded in the sediments and peats, and the site's comparison with nearby peatlands renders it a particularly important link in the Midlands Meres and Mosses series of glacial wetlands.</p> <p>Adders <i>Vipera berus</i>, a protected species, are found here and at only one other known site in Cheshire.</p>
Impact Risks	The neighbourhood area does not fall within the SSSI Impact Risk Zone

Newcastle Under Lyme Borough Council
Planning Services Department -
Strategy, Development and
Regeneration
Castle House Barracks Road
Newcastle
ST5 1BL

Our ref: SV/2023/111608/OR-
03/PO1-L01
Your ref: Keele NP SEA
Date: 10 January 2024

Dear Sir/Madam

Keele Neighbourhood Development Plan – Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) Screening Report Consultation Draft

Strategic Environmental Assessment:

The European Union directive 200142/EC requires a SEA to be undertaken for certain types of plans and programmes that would have ‘significant’ environmental effect(s).

Paragraph: 046 in the Strategic Environmental Assessment and Sustainability Appraisal Guidance (Reference ID: 11-046-20150209) states “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 is likely to have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan or other strategic policies for the area”.*

Having reviewed the Screening Report submitted, and in consideration of the matters within our remit, given the lack of specific site allocations within the Neighbourhood Plan, we concur with the conclusion that the Keele Neighbourhood Plan is unlikely to have significant environmental impacts and a **Strategic Environmental Assessment** is not therefore required.

Habitats Regulation Assessment:

Article 6(3) of the European Habitats Directive (1992) requires that any plan (or project), which is not directly connected with or necessary to the management of a European site (also known as a “Natura 2000” site), but would be likely to have a significant effect on such a site, either individually or in combination with other plans or projects, shall be subject to an ‘appropriate assessment’ of its implications for the European site in view of the site’s conservation objectives.

Having reviewed the HRA Screening report, and in consideration of the matters within our remit, we concur the Keele Neighbourhood Plan is considered unlikely to have significant effects on the European designated sites.

Environment Agency
9, Sentinel House Wellington Crescent, Fradley Park, Lichfield, WS13 8RR.
Customer services line: 03708 506 506
www.gov.uk/environment-agency

Cont/d..

We note that no European or Ramsar Sites have been identified within the plan area and there does not appear to be any obvious pathways to sites in neighbouring plan areas.

I trust that the above is of assistance.

Yours faithfully

Emma Millband
Planning Officer

Direct e-mail emma.millband@environment-agency.gov.uk

Neighbourhood Planning

Environment Agency consultation guide/pro-forma

Version 7, Oct 2023

The Environment Agency aim to reduce and protect against flood risk, whilst protecting and enhancing the water environment, land, and biodiversity. To assist us in the West Midlands area in providing the most focused and accurate consultation responses through the Neighbourhood Planning process we have produced the below guidance and pro-forma for you to consider, complete and return to **Newcastle-Under-Lyme Borough Council**.

You may wish to also refer to the [Neighbourhood planning - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/neighbourhood-planning) guidance to assist you in the preparation of your Plan.

The Environment Agency along with Natural England, Historic England, and the Forestry Commission have also produced some national guidance which offers further environmentally specific information in the context of Neighbourhood Planning and gives ideas on incorporating the environment into Plans. The guidance is available at: [How to consider the environment in Neighbourhood plans](#).

In the context of Climate Change there is further information on writing a low-carbon Neighbourhood Plan available at: [How to write a neighbourhood plan in a climate emergency](#).

To compliment the above, we have produced the following guidance to assist you in the West Midlands area specifically. This takes you through some of the relevant environmental issues your community should consider when producing a Neighbourhood Plan. We recommend completing the pro-forma to check the environmental constraints specific to your Plan area, which should help identify challenges, inform evidence and policy, and assist delivery of sustainable solutions. This approach will help ensure you have a robust Plan.

Flood Risk: Your Plan should conform to national and local policies on flood risk. National Planning Policy Framework (NPPF) – Paragraph 159 states that ‘Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere’.

It is important that your plan is in accordance with the current local plan (Newcastle-Under-Lyme and Stoke-on-Trent Core Spatial Strategy 2006 – 2026), specifically Policy CSP3 – Sustainability and Climate Change (and the associated text).

If your Plan is proposing sites for development, you should check whether any of the proposed allocations are at risk of river or tidal flooding based on our Flood Map (of modelled flood risk). For example, are there any areas of Flood Zone 3 or 2 (High and Medium Risk)? In line with National Planning Policy and, specifically, the Sequential Test, you should aim to locate built development within Flood Zone 1, the low-risk Zone. Our **Flood Map** can be accessed via the following link: [Check the long term flood risk for an area in England - GOV.UK \(www.gov.uk\)](#)

In addition to the above you should also check with the Council **Neighbourhood Planning / Planning Policy Team** with regards to other sources of flooding (such as surface water, groundwater, sewers, and historic flooding) as detailed in their Strategic Flood Risk Assessment (SFRA). **Newcastle-Under-Lyme Borough Council**, as the Lead Local Flood Authority (LLFA),

has responsibility for local flood risk management and may hold flooding information that is not identified on our Flood Map.

Specifically, some watercourses have not been modelled on our Flood Maps (Our Flood Maps primarily show flooding from Main Rivers, not ordinary watercourses, or un-modelled rivers, with a catchment of less than 3km²).

Any allocations in areas of flood risk should include a consideration of climate change (see below). In the absence of up-to-date modelled flood risk information, or a site-specific FRA, to confirm an appropriate allowance you may wish to utilise the current Flood Zone 2 extent (where available) to indicate the likely, nominal, Flood Zone 3 with climate change extent. Where no modelling or flood map outline is available you will need to consider an alternative approach. Where an un-modelled watercourse is present, or adjacent to a site, then it may be prudent to incorporate a buffer zone, relative to topography, in consideration of flood risk not shown on the Flood Map.

Some assessment is necessary in your Plan, to confirm that the site is developable. This includes safe occupation and that there will be no impact on third parties. You might seek opportunities for flood risk reduction.

All 'major development' sites with flood risk issues, especially those with ordinary watercourses or un-modelled rivers within/adjacent or near to sites, are likely to need detailed modelling at the planning application stage to verify the design flood extents, developable areas and that the development will be sustainable.

Climate Change: Your Local Authority's SFRA should indicate the extent of flood zones with likely climate change. The NPPG refers to Environment Agency guidance on considering climate change in planning decisions which is available online: <https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances> (new allowances were published on 27 July 2021).

Please refer to our separate 'Area Climate Change Guidance' (March 2023) for more information on how to consider and incorporate allowances in development proposals. This advises that an allowance should be added to 'peak river flows' to account for 'climate change' which should be specific to a river 'management catchment'.

You may wish to use the following link in conjunction with our Area Specific Climate Change Guidance to ascertain the correct climate change peak flow allowances in your area: [Climate change allowances for peak river flow in England \(data.gov.uk\)](#).

Surface water (peak rainfall intensity) climate change allowances should be discussed with the LLFA.

Flood Defences: Areas of your Parish, or proposed sites, may be afforded protection by a flood defence/alleviation scheme. Where this is the case, your Plan should acknowledge this and identify the level of protection provided (including any climate change allowance). It should be noted that flood defences are intended to protect existing properties and are not to facilitate new development in areas that would otherwise be impacted by flooding. Any assessment of development behind flood defences should consider the impacts of a breach or overtopping. Where it is determined that new development should be behind a flood defence, financial contributions may be sought to maintain or improve the structure.

Waste Water Infrastructure: Waste water infrastructure is also of importance in your Plan. Where housing is proposed you should use the pro-forma to identify the receiving treatment works and whether the housing and/or any employment growth can be accommodated without impacting the received treatment works. You should look at physical capacity issues (e.g. network pipes) and environmental capacity (quality of treated effluent) issues.

The Environment Agency has offered advice to Newcastle-Under-Lyme Borough Council, as part of their Local Plan review, to help ensure that their strategic housing growth can be accommodated in consideration of waste water infrastructure. Information on local treatment works and their ability to accommodate housing and employment growth can be found in the Water Cycle Study (WCS). [In addition, you should contact the Water Company for further advice.](#)

Where there is an identified constraint (amber or red) you should demonstrate that there is a solution (it may be already programmed or could be a possible future infrastructure upgrade) to help improve the capacity issue and enable the development to go ahead. This will require consultation with the Water Company, and we have developed some general questions to assist this process. The outcome of this may inform a 'phasing' policy within your plan where appropriate. It may also be necessary to produce an 'Infrastructure Delivery Plan' to set out any key milestones for wastewater infrastructure upgrades and improvements. The evidence you produce should give a reasonable degree of certainty to all parties, helping demonstrate development is deliverable, and importantly ensure that your plan is 'sound'.

Note: Government Guidance states that sufficient detail should be provided to give clarity to all parties on when infrastructure upgrades will be provided, looking at the needs and costs (what and how much). The NPPG refers to "ensuring viability and deliverability – pursuing sustainable development requires careful attention to viability and costs in plan making and decision making". Plans should be "deliverable".

We would recommend discussions with the Utility Company to ascertain how you can progress with your Plan without impact on the works. The below may assist:

- [What solutions are programmed within Asset Management Plans \(AMP\)? When will these solutions be delivered? Are there any options for accelerating these schemes via developer contributions?](#)
- [In the absence of an improvement schemes what could alternative solutions be \(type and location of\) for short/medium/long term growth. Are these solutions cost prohibitive?](#)
- [Are there any short-term options to facilitate growth? Some options to consider could be SUDS retrofitting or removing surface water from sewer systems.](#)
- [Utility companies could be asked about what WFD work they already have programmed in to their AMP Schemes for Phosphate stripping or other sanitarities \(e.g. ammonia/Biological Oxygen Demand\).](#)
- [With reference to the NMP, and Phosphate specific issues, are there any stringent measures factored in to ensure no environmental deterioration? What improvement scheme is, or could be, in place to bring forward development?](#)

Water Management and Groundwater Protection: In February 2011, the Government signalled its belief that more locally focussed decision making, and action should sit at the heart of improvements to the water environment. This is widely known as the catchment-based approach and has been adopted to deliver requirements under the Water Framework Directive (WFD). It seeks to:

- deliver positive and sustained outcomes for the water environment by promoting a better understanding of the environment at a local level; and
- encourage local collaboration and more transparent decision-making when both planning and delivering activities to improve the water environment.

Neighbourhood Plans provide an opportunity to deliver multi-functional benefits through linking development with enhancements to the water environment. Local WFD catchment data can be obtained from: [River Basin Catchment Data Explorer](#).

Newcastle-Under-Lyme Borough (Lyme Brook catchment) falls within the Humber, River Basin Management Plan area and the document highlights key issues and actions for the catchments that should be of use in developing your Neighbourhood Plan. The latest HRBMP was updated in December 2022 (available at [Humber river basin district river management plan: updated 2022 - GOV.UK \(www.gov.uk\)](#)). The Severn and North West River Basin District management plans also partially cover the borough.

Aquifers and Source Protection Zones: Some of your local area, and specific potential site allocations, may be located upon or within aquifers and Source Protection Zones (link below). SPZ 1 is especially sensitive. You might consider these within your Plan and when allocating sites. The relevance of the designation and the potential implication upon development proposals should be seen with reference to our Groundwater Protection Position Statements: <https://www.gov.uk/government/publications/groundwater-protection-position-statements>

Development and surface water drainage will need to be carefully located and designed to avoid pollution risks to waters and address potential environmental impact associated with low flows. For example SuDS may need to provide multiple levels of treatment. To address any quantitative issues with the waterbodies, SuDS should be designed so to maximise recharge to the aquifer and support water levels in receiving rivers.

Water Efficiency at Neighbourhood Plan Level: Local Water Efficiency targets may be secured in a neighbourhood plan or higher-level local plan policy. The draft Technical Standards – Housing Standards Review (Paragraph 14) provided advice on more stringent ('optional') water efficiency targets/measures, which go beyond the minimum building regulations standard. Paragraph 14 states that..."Neighbourhood Planning Bodies will only be able to apply the space standard and not optional requirements".

These standards have since been enshrined into the Building Regulations (part G) "*The optional requirement only applies where a condition that the dwelling should meet the optional requirement is imposed as part of the process of granting planning permission. Where it applies, the estimated consumption of wholesome water calculated in accordance with the methodology in the water efficiency calculator, should not exceed 110 litres/person/day*". However, there is no direct responsibility for Neighbourhood Plans to incorporate these water efficiency measures.

Cemetery Allocations: Allocations for cemeteries brought forwards within Neighbourhood Plans must consider their location in relation to Flood Zones, Source Protection Zones (Any Borehole – including private – for potable supply should be considered) and Type of Aquifer. We would offer comments primarily in relation to the protection of controlled waters. Matters relating to human health should be directed to the Local Authority. If steps are not taken to reduce the risks, burials can present a risk to the water environment. The proposed burial ground will need to meet our minimum groundwater protection requirements as set out in the following document: [Protecting groundwater from human burials - GOV.UK \(www.gov.uk\)](#).

Biodiversity Net Gain: Development of allocated sites offers the opportunity for Biodiversity Net Gain (BNG) as referenced in Paragraph 174 of the NPPF ‘Conserving and enhancing the natural environment’. Specifically, any ponds and flood storage areas if designed correctly could also provide opportunity for blue and green infrastructure, such as wetland habitat throughout the year as well as providing a recreation amenity.

Whilst we would not necessarily expect to see specific BNG details for allocations within the Plan, there may be an opportunity to promote ‘Net Gains’ within your Policies.

Please see [Biodiversity net gain - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/biodiversity-net-gain) and [Biodiversity Net Gain for local authorities | Local Government Association](#) for further information.

Neighbourhood Plan Environment Agency Pro-Forma

Site Allocation Description e.g. name, type and number of units.	Flood Zone (3/2/1) *	Unmodelled river or ordinary watercourse in or adjacent to site	Other sources of flooding (e.g. SW, GW, SF)	Flood Defence	Aquifer/Source Protection Zone 1 (Description)	Environmental Capacity at Treatment Works (Red – potential showstopper, Amber – possible problem; or Green – likely to be no issues)
Example	2	Y	SW	N	N	Amber
		Y/N		Y/N	Y/N	
		Y/N		Y/N	Y/N	
		Y/N		Y/N	Y/N	
		Y/N		Y/N	Y/N	
		Y/N		Y/N	Y/N	
		Y/N		Y/N	Y/N	
		Y/N		Y/N	Y/N	

***Note to above:** Flood Zone 3 is the high-risk zone and is defined for mapping purposes by the Environment Agency's Flood Zone Map. Flood Zone 3 refers to land where the indicative annual probability of flooding is 1 in 100 years or less from river sources (i.e. it has a 1% or greater chance of flooding in any given year). Flood Zone 2 is land where the indicative annual probability of flooding is between 1 in 100 and 1 in 1000 years. Flood Zone 1 is the low-risk Zone with a flood risk in excess of 1 in 1000 years.

When considering ‘other sources of flooding’ you should refer to the SFRA and contact **Newcastle-Under-Lyme Borough Council** to ascertain whether the Parish, or specific allocated site, is impacted by surface water, groundwater, or sewer flooding etc. The team and/or the LLFA may also have historic flooding information to help inform your plan. More information on sewer flooding, or plans to remedy such, may be available from the Water Company.

Produced by: West Midlands Sustainable Places Team.
Please contact us at: westmidsplanning@environment-agency.gov.uk



Historic England

Sir/Madam Planning Policy Team
Newcastle-under-Lyme Borough Council
Castle House
Barracks Road
Newcastle-Under-Lyme
Staffordshire
ST5 1BL

Direct Dial: 0121 625 6887

Our ref: PL00794758

5 January 2024

Dear Sir/Madam Team

KEELE NEIGHBOURHOOD PLAN- SEA/HRA SCREENING

Thank you for your consultation and the invitation to comment on the SEA Screening Document for the above Neighbourhood Plan.

For the purposes of consultations on SEA Screening Opinions, Historic England 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. On the basis of the information supplied and in the context of the criteria set out in Schedule 1 of the Environmental Assessment Regulations [Annex II of the 'SEA' Directive], Historic England concurs with your view that the preparation of a Strategic Environmental Assessment is not required.

Regarding HRA Historic England does not disagree with your conclusions but would defer to the opinions of the other statutory consultees.

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, please note that Historic England has published guidance on Sustainability Appraisal / Strategic Environmental Assessment and the Historic Environment that is relevant to both local and neighbourhood planning and available at: <https://www.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>

I trust the above comments will be of help in taking forward the Neighbourhood Plan.

Yours sincerely,

P. Boland.



THE FOUNDRY 82 GRANVILLE STREET BIRMINGHAM B1 2LH

Telephone 0121 625 6888
HistoricEngland.org.uk



Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.



Historic England

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cc:



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Historic England is subject to both the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any Information held by the organisation can be requested for release under this legislation.

Date: 05 January 2024
Our ref: 459782
Your ref: Keele Neighbourhood Plan - SEA & HRA Screening Consultation



Planning Policy Team
Newcastle-under-Lyme Borough Council

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T 0300 060 3900

BY EMAIL ONLY

Dear Planning Policy Team

Keele Neighbourhood Plan – SEA & HRA Screening Consultation

Thank you for your consultation on the above dated 06 December 2023

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 is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Habitats Regulations Assessment (HRA) Report

Natural England notes that your authority, as competent authority under the provisions of the Habitats Regulations, has screened the proposal to check for the likelihood of significant effects.

Your assessment concludes that the proposal can be screened out from further stages of assessment because significant effects are unlikely to occur, either alone or in combination. On the basis of the information provided, Natural England concurs with this view.

If the plan changes, in further stages of the process, it may be necessary to re-screen the plan and Natural England should be consulted at that stage.

Strategic Environmental Assessment Screening Report

It is Natural England's advice, on the basis of the material supplied with the consultation, that significant effects on statutorily designated nature conservation sites or landscapes are unlikely.

The proposed neighbourhood plan is unlikely to significantly affect any Site of Special Scientific Interest (SSSI), Marine Conservation Zone (MCZ), Special Areas of Conservation (SAC), Special Protection area (SPA), Ramsar wetland or sites in the process of becoming SACs or SPAs ('candidate SACs', 'possible SACs', 'potential SPAs') or a Ramsar wetland. The plan area is unlikely to have a significant effect on a National Park, Area of Outstanding Natural Beauty or Heritage Coast, and is unlikely to impact upon the purposes for which these areas are designated or defined.

Guidance on the assessment of Neighbourhood Plans, in line with the Environmental Assessment of

Plans and Programmes Regulations 2004 is contained within the [Planning Practice Guidance](#). This identifies three triggers that may require the production of an SEA:

- 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.

Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require an SEA. Further information is included in Natural England's [standing advice](#) on protected species.

Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant an SEA. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission [standing advice](#).

We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a SEA is necessary.

Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If a SEA is required, Natural England must be consulted at the scoping and environmental report stages.

Other advice

We refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

Yours sincerely

Sally McLaughlin

Sally McLaughlin
Lead Adviser
Land use planning – West Midlands Area Team

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The [Magic](#)¹ website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails,**

¹ <http://magic.defra.gov.uk/>

Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones). Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available [here](#)².

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#)³. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#)⁴.

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the [Magic](#)⁵ website and also from the [LandIS website](#)⁶, which contains more information about obtaining soil data.

Natural environment issues to consider

The [National Planning Policy Framework](#)⁷ sets out national planning policy on protecting and enhancing the natural environment. [Planning Practice Guidance](#)⁸ sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for

² <http://www.nbn-nfbr.org.uk/nfbr.php>

³ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

⁴ <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

⁵ <http://magic.defra.gov.uk/>

⁶ <http://www.landis.org.uk/index.cfm>

⁷ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/807247/NPPF_Feb_2019_revised.pdf

⁸ <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed [here](#)⁹), such as Sites of Special Scientific Interest or [Ancient woodland](#)¹⁰. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed [here](#)¹¹) or protected species. To help you do this, Natural England has produced advice [here](#)¹² to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 171. For more information, see our publication [Agricultural Land Classification: protecting the best and most versatile agricultural land](#)¹³.

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife.
- Adding a green roof to new buildings.

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see [Planning Practice Guidance on this](#) ¹⁴).

⁹<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹⁰ <https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>

¹¹ <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

¹² <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

¹³ <http://publications.naturalengland.org.uk/publication/35012>

¹⁴ <http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/>

- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).