

Abbots Leigh, Ham Green, Pill and Easton-in-Gordano Neighbourhood Plan

Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA) Screening Report

North Somerset Council
October 2020



Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment Screening Report

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1. Introduction - purpose of this report

- 1.1. An initial screening report was undertaken in July 2020. Following responses from Historic England and the Environment Agency this report has been revised. It now includes reference to an additional assessment of heritage assets undertaken by North Somerset Council at the request of Historic England (included as an appendix to this report). It also includes a revised assessment of the need for an SEA with regards to flood risk following the advice of the Environment Agency. The original screening undertaken in July also erroneously referred to the title of the Neighbourhood Plan being the Pill and District Neighbourhood Plan. This has been corrected to the Abbots Leigh, Ham Green, Pill and Easton-in-Gordano Neighbourhood Plan in this revised screening.
- 1.2. The National Planning Practice Guidance (NPPG) states that one of the basic conditions that will be tested at examination stage is to see if the Neighbourhood Plan is compatible with the European Union obligations (including under the Strategic Environmental Assessment Directive).
- 1.3. As the Neighbourhood Plan will become a statutory development plan document, there is a legal requirement to assess the policies and proposals in the Neighbourhood Plan against the requirements of European Union Directive 2001/42/EC; also known as the “Strategic Environmental Assessment (SEA) Directive”. The objective for SEA is: “to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment.” (SEA Directive, Article 1). A full SEA is only required if the plan proposals are likely to have significant environmental effects. This screening report assesses the likelihood of this.
- 1.4. Strategic Environmental Assessment (SEA) will only be required for a Neighbourhood Plan if it is likely to cause significant environment effects. Neighbourhood plans that are located near to a European wildlife site may also trigger the Habitats Directive depending on how complex the proposed policies are. The Duty to Cooperate requires the Local Planning Authority (alongside Natural England, Environment Agency, and English Heritage) to advise and assist on SEA and HRA requirements. This involves the Local Planning Authority undertaking a screening assessment of the emerging neighbourhood plan proposals at an early stage to ascertain whether they will trigger any EU

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directives or Habitat directives and thus to avoid the community and local authority undertaking unnecessary work.

- 1.5. The Habitats Regulations (2010) require an assessment of land use planning proposals associated with neighbourhood plans. The assessment process examines the likely significant effects of the policies on the integrity of the European wildlife sites of nature conservation importance within, close to or connected to the plan area. European wildlife sites are areas of international nature conservation importance that are protected for the benefit of the habitats and species they support. This assessment is known as a Habitat Regulation Assessment (HRA). For the purposes of the HRA, international designated wildlife sites are Special Protection Areas (SPA), Special Areas of Conservation (SAC), and Ramsar wetland sites.
- 1.6. This screening report is in two parts. Section 3 sets out whether or not the contents of the Neighbourhood Plan requires a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004. Section 4 looks at whether a full HRA is required under the Habitat Regulations 2010.

2. Scope of the Neighbourhood Plan

- 2.1. The Neighbourhood Area lies to the west of Bristol within North Somerset District and is separated from Bristol by the River Avon. It comprises the two parishes of Abbots Leigh, and Pill and Easton-in-Gordano.
- 2.2. The Plan is being prepared by the Neighbourhood Plan steering group on behalf of Abbots Leigh and Pill & Easton-in-Gordano Parish Councils and this screening report has been undertaken by North Somerset Council on the consultation draft version of the plan, published in April 2020.
- 2.3. The Neighbourhood Plan does not attempt to wholly replace North Somerset Councils Local Plan policies (Core Strategy 2017, Development Management Plan 2016 and Sites and Policies Plan 2017). It seeks to add local context to the existing planning policy framework. Where silent on an issue it is the existing adopted planning policies in the Core Strategy, Development Management Plan and Site Allocations Plan which will be used in consideration of development proposals. The Plans timescale is to 2026 to align with the North Somerset Council Core Strategy.

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2.4. The Plan specifically considers the following:

Housing

- Allocation of two housing sites one edge of settlement of around 16 affordable housing units and the other a brownfield mixed redevelopment of around 24 mixed tenure homes and 60 bed care home
- A requirement for an energy assessment for new development
- The circumstances in which infill development will be appropriate

Transport

- Encouragement of walking, cycling and public transport
- Consideration of the impact of electric car use and minimisation of air pollution impacts of new development
- Consideration of the impact of re-opening Portishead railway line

Landscape environment and biodiversity and heritage

- protect high sensitivity landscape, open spaces and grass verges
- new development to respect historic environment setting and commitment to investigate conservation area designation in Abbots Leigh

Economy

- policies to promote small businesses and protection of existing employment uses

Climate emergency

- support for domestic renewable energy proposals

Community facilities

- protection for valued open spaces, new recreational facilities, and redevelopment or enhancement of Pill Precinct

The vision is:-

“A distinctive, stable and sustainable neighbourhood meeting local needs and promoting strong communities”.

The primary objectives of the Plan are to:-

- Contribute to meeting local housing need through a mix of tenure, size and affordability.
- Minimise the impact of road traffic on congestion, parking, safety, and pollution.
- Encourage walking and cycling and ensure the accessibility, convenience and safety of cycle and walking routes
- Sustain and enhance the landscape, ecology and bio-diversity of the area whilst protecting its environmental assets.

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- Respect, preserve and protect the history and the heritage of the built environment.
- Support the generation of local jobs for local people.
- Respond to climate change and move towards a carbon neutral neighbourhood
- Protect, maintain and enhance open spaces, rights of way and pathways for walking and cycling.
- Celebrate and sustain the strengths, cohesion and inclusion of the diverse communities of the area.

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Neighbourhood area



3. SEA requirements

- 3.1. Neighbourhood Plans must be in general conformity with the strategic policies of the Local Plan which in this case is taken to be the North Somerset Core Strategy. The Core Strategy was subject to a full Sustainability Appraisal which included a SEA assessment. This ensured that there were no likely significant effects which would be produced from the implementation of the Core Strategy and if so ensured mitigation measures were in place. The council considers that there is general conformity between the Pill and District Neighbourhood Plan and the Core Strategy and that there are no significant changes introduced by the Pill and District Neighbourhood Plan.
- 3.2. The screening exercise undertaken in July indicated a potential significant environmental effect in relation Core Strategy policy CS3 “Environmental Impacts and flood risk assessment”. This was with respect to Neighbourhood Plan policy CAF 2 which in it’s proposed form in the Consultation Draft of the Plan stated “proposals for the redevelopment and enhancement of Improvement Area 4-the Pill Precinct.... “. This wording has now been amended in the Plan prior to submission to refer not to “redevelopment” but only to proposals which result in the “enhancement of the amenity and accessibility” of the Precinct. The Environment Agency disagreed with the original screening assessment (based on the wording of the policy at the time) that a full SEA would be required for the policy, responding that this would not be the case. However, in any event the revised policy wording more accurately reflects the communities’ aspirations. The conclusion has now been amended accordingly within this report.
- 3.3. This screening report follows the ODPM guidance on SEA’s on ascertaining whether a full SEA is required. That guidance is set out in a flow diagram which is reproduced in appendix 1.
- 3.4. The process followed to complete the assessment accords with the diagram (Figure 2) of the Practical Guide to the Strategic Environmental Assessment (reproduced below). The table which follows sets out the assessment undertaken in accordance with that diagram.

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**Table 1
Application of SEA Directive to the Abbots Leigh, Ham Green, Pill and Easton-in-Gordano Neighbourhood Plan**

Stage	Y/N	Reason
1. Is the PP (plan or programme) subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	Y Go to Q2	The preparation of and adoption of the Neighbourhood Plan (NP) is allowed under The Town and Country Planning Act 1990 as amended by the Localism Act 2011. The NP is prepared by Pill and Easton-in-Gordano, and Abbots Leigh Parish Councils (as the "relevant body") and will be made by NSC as the local authority. The preparation of NPs is subject to The Neighbourhood Planning (General) Regulations 2012 (as amended)
2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))	N Go to Q3	Communities have a right to be able to produce a NP, however communities are not required by legislative, regulatory or administrative purposes to produce a Neighbourhood Plan. This plan however if adopted, would form part of the statutory development plan, therefore it is considered necessary to answer the following questions to determine further if an SEA is required.
3. Is the PP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use,	N Go to Q4	The NP is prepared to set out a framework for town and country planning and the future development of a number of land uses within the combined parishes of Pill & Easton-in-Gordano and Abbots Leigh, however it does not anticipate being the tool to manage development of the scale and nature envisaged by Annex I

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Stage	Y/N	Reason
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))		
4. Will the PP, 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))	N Go to Q5	The HRA screening assessment is undertaken at Section 4 of this report. It concludes that no Appropriate Assessment is required as the implementation of the plan is unlikely to have any significant adverse effects on protected species or their habitats
5. Does the PP 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) <i>European Commission guidance suggests that plans which determine the use of small areas at local level might include “a building plan which, for a particular, limited area, outlines details of how buildings must be constructed,</i>	Y Go to Q8	Determines the use of two sites within the neighbourhood area larger than individual buildings, but within a contained footprint. One is the redevelopment of an existing brownfield site within the perimeter of the site of a previous hospital within the green belt. The other is an edge of settlement greenfield site within the green belt. The plan also supports the enhancement of a village centre precinct, but does not contain a specific proposal for this.

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Stage	Y/N	Reason
<i>determining, for example, their height, width or design”</i>		
6. Does the PP set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3.4)	Y Go to Q8	The NP is to be used for determining future planning applications.
7. Is the PP’s sole role to serve the national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art 3.8, 3.9)	N	n/a
8. Is it likely to have a significant effect on the environment? (Art. 3.5)	N	A screening exercise has identified that an Appropriate Assessment was not required (see section 4 of this report). No development is proposed which would have a significant adverse effect on heritage assets (see para appendix 3c and Historic England response at appendix 5) or landscape or biodiversity interests. There are not likely to be any significant environmental effects in relation to flood risk requiring an SEA and this has been confirmed by the Environment Agency (appendix 5)

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- 3.5. In relation to 8 in the table above the criteria for determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC include two sets of characteristics for determining the likely significance of effects on the environment. These relate to: i) the characteristics of the Neighbourhood Plan and ii) the characteristics of the effects and of the area likely to be affected by the Neighbourhood Plan. These form the basis for the conclusion set out in 8, that a no likely significant effect upon the environment has been identified.
- 3.6. In making a determination, North Somerset Council has taken into account the criteria specified in Schedule I of the Regulations as set out in table 2 below and response form the consultation bodies to the initial screening report in July 2020.

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Table 2

Criteria for determining the likely significant effects referred to in Article 3 (5) of Directive 2001/42/EC and assessment of these.

Criteria in Annex II of the SEA Directive	Significant environmental effects likely?	Response
(1) Characteristics of the plan and programmes, having regard, in particular to:-		
a) The degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.	No	<p>The Plan will set a framework for development proposals within the Neighbourhood Area of a level which conforms with the North Somerset Core Strategy which has been subject to SEA.</p> <p>Abbots Leigh is an infill village washed over by the Green Belt, where very limited development will take place. The Plan proposes only conversion of existing rural buildings within this part of the NDP area.</p> <p>Easton-in-Gordano is a service village surrounded by but not within the Green Belt. Service villages have a level of facilities and services which can support some additional development either within or adjacent to the settlement boundary of up to 25 dwellings. The plan allocates two sites for development and supports the redevelopment or refurbishment of another, one greenfield exceptions site for new affordable homes adjacent to the built-up area (but not the settlement boundary) of Pill/Easton-in-Gordano the redevelopment of a brownfield site within an existing hospital redevelopment in the Green Belt. Other policies support the protection of the environment but do not contain specific proposals.;</p>

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Criteria in Annex II of the SEA Directive	Significant environmental effects likely?	Response
		supports refurbishment of the Pill Precinct area.
The degree to which the plan or programme influences other plans and programmes including those in a hierarchy	No	The Neighbourhood Pan is subordinate to the Core Strategy and will sit alongside the Site Allocations Plan and Development Management Plan. It does not set the framework for lower order plans or programmes.
The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development	No	<p>The Neighbourhood plan is a land use plan and is required to contribute to the achievement of sustainable development. The Plan itself contains policies to promote sustainable development and the protection of important environmental assets. Development proposals will also need to be in accordance with environmental protection policies of the adopted Core Strategy and NPPF.</p> <p>There are a number of listed buildings within the plan area (Appendix 3a and 3b and 3c) although none of the plans policies or proposals are likely to have a significant effect on these.</p> <p>These appendices also show a registered park and garden at Leigh Court the perimeter of which is some 360m distant from the site in policy HO2, but not considered to be significantly impacted by it (appendix 3c).</p>

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Criteria in Annex II of the SEA Directive	Significant environmental effects likely?	Response
Environmental problems relevant to the plan or programme	yes	<p>The NDP area lies towards the mouth of the river Avon where it meets the Severn Estuary. Some locations within the NDP area are variously subject to fluvial flood zone 3B and tidal flood zone 3A as shown on the map at appendix 2 a-d. Sea/river defences along the edge of the River Avon and Crockern Pill are in place to protect the central area of Pill and housing around Crockerne Pill and fronting the River Avon, from tidal flooding and fluvial flooding.</p> <p>The area known as Pill Precinct is subject of policy CAF2. Part of this area is within fluvial flood zone 3B and the majority of it is within tidal flood zone 3A. The Precinct area comprises 12 commercial units with flats above, as well as adjacent car parking and garages. A flood risk assessment would be required for any redevelopment.</p>
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)	No	The implementation of community legislation is unlikely to be significantly compromised by this Neighbourhood Plan.

(2) Characteristics of the effects and of the area likely to be affected, having regard, in particular to:-

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Criteria in Annex II of the SEA Directive	Significant environmental effects likely?	Response
a) The probability, duration, frequency, and reversibility of the effects.	No	<p>This narrative concentrates on the impact of CAF2 relating to redevelopment or enhancement of Pill Precinct on flood risk. In general, in respect to the rest of the Plans proposals, in light of the scale and nature of the proposals it is considered very unlikely that other significant effects will result. The plan policies and proposals support only small-scale development with the exception of a potential change of use of a site from employment to mixed use. It is improbable therefore that there will be any significant effects on the environment.</p> <p>Part of the western garage/parking area of the Pill Precinct is subject to fluvial 3b hence at significant risk of flooding with a 1:100 year probability. The flood risk comes from the culverted (at this point) Markham Brook.</p> <p>The majority of the site is affected by tidal flood zone 3a with a 1:200 year probability of flooding. The shops at ground floor level are classed as less vulnerable however residential units are located above which are in the vulnerable category.</p> <p>National policy requires that a sequential test and potentially an exceptions test is undertaken prior to any redevelopment proposals in this area. This is not the intention of the Plan. Policy CAF 2 supports only proposals for the enhancement of amenity and accessibility of the Pill Precinct and does not promote any development which would result in an either an SEA being required, or an exceptions test to be undertaken.</p>

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Criteria in Annex II of the SEA Directive	Significant environmental effects likely?	Response
b) The cumulative nature of the effects.	No	None have been identified within the Plan area
c) The trans boundary nature of the effects.	No	The area affected by fluvial flood zone 3b is contained to the central river channel and does not have cross boundary implications.
d) The risks to human health or the environment (e.g. due to accidents).	No	The Neighbourhood Plan is unlikely to introduce significant risks to human health in general in light of the nature and scale of the majority of proposals.
e) The magnitude and spatial extent of the effects (geographical area and size of the population likely)	No	The scale of development proposed in the Neighbourhood Plan is small and therefore the potential for environmental effects is also likely to be small and localised. It is unlikely that the effects of the proposals within the Plan will be large scale and extensive in themselves in the context of the SEA. See also c) and d) above
f) The value and vulnerability of the area likely to be affected due to:		
i) Special natural characteristics or cultural heritage	No	<ul style="list-style-type: none"> The HRA screening assessment at section 4 of this report concludes there are unlikely to be significant effects on bats or their habitat (bat SAC). There are a number of listed buildings within the

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Criteria in Annex II of the SEA Directive	Significant environmental effects likely?	Response
		neighbourhood area and an unregistered park and garden, however the Heritage Assessment at appendix 3c) none of the proposals would have a significant adverse affect on these
ii) Exceeded environmental quality standards or limit values	No	<ul style="list-style-type: none"> There are a number of nationally or locally protected areas or buildings falling partly within the neighbourhood area (SSSI, SNCI, listed buildings) however none of the plan policies or proposals will have a direct influence on these designated areas or buildings.
iii) Intensive land use	No	<ul style="list-style-type: none"> The Neighbourhood Plan is unlikely to result in the exceedance of environmental quality standards, such as those relating to air, water and soil quality, due to the nature and scale of the development. The Plan is unlikely to bring forward development of an extent which would result in significant intensification of local land use.
g) The effects on areas or landscapes which have a recognised national, Community or international protection status.	No	There are no such areas of landscape designation within the neighbourhood area.

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Conclusions with respect to SEA Screening

- 3.7. On the basis of the SEA screening assessment set out in tables 1 and 2 above, the conclusion is that the Abbots Leigh, Ham Green, Pill and Easton-in-Gordano Neighbourhood Plan is unlikely to have significant environmental effects. This is supported by Historic England, the Environment Agency and Natural England (see appendix 5)

4. HRA Screening

- 4.1. The North Somerset Core Strategy was adopted in April 2012 and was subject to a high level HRA assessment. The Pill and District Plan is in general conformity with the strategic policy approach of the Core Strategy, in terms of nature and location of development and therefore broadly complies with the HRA undertaken at that time.
- 4.2. The Pill and District Neighbourhood Plan looks at a much more local level than the Core Strategy and therefore it is necessary to consider whether any policies or proposals arising from the Plan differ materially from the Core Strategy. Policy CS4 of Core Strategy seeks to protect, connect and enhance important habitats, particularly designated sites, ancient woodlands and veteran trees.
- 4.3. Development Management Policies Plan adopted in July 2016 contains policy DM8 on nature conservation which requires proposals to take account of their impact on local biodiversity including Sites of National and International importance, local nature reserves and site and legally protected species and habitats.
- 4.4. The Pill and District Neighbourhood Plan does not seek to replicate these policies, or to suggest a different approach.
- 4.5. The maps at Appendix 4 demonstrate the extent of European protected sites in relation to the area covered by the Pill and District Neighbourhood Plan. These designations extend beyond the neighbourhood area and outside North Somerset Councils area into Bristol City Council area. Consistent with the regulations, the screening exercise has taken account of whether significant effects are likely from the Pill and District Neighbourhood Plan alone, and also whether in-combination effects are likely (taking account of other plans and projects in combination with it).
- 4.6. Relevant designations are:-
 - RAMSAR-Severn Estuary
 - Special Protection Area (SPA)
 - Special Area of Conservation (SAC)
 - Severn Estuary SAC
 - Avon Gorge Woodlands; and
- 4.7. The Severn Estuary RAMSAR SAC and SPA are referred to collectively as the Severn Estuary Site.
- 4.8. Additional considerations-North Somerset and Mendips Bat SAC. No part of the neighbourhood area falls within the Bat SAC itself-the consultation zones are

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set out in the North Somerset Council Bat SAC guidance on development SPD adopted 2018. The SPD is intended as a guide to developers at project level, however regard has also been had to it in the formulation of this screening exercise.

Severn Estuary Site

- 4.9. Qualifying features for the Severn Estuary Ramsar overlap with those of the SAC and the SPA. The qualifying features are provided in Appendix 4c.
- 4.10. The RAMSAR designation intermittently overlaps the neighbourhood area along the north western edge within the Severn Estuary and the north eastern edge of the neighbourhood area along the banks of the River Avon.
- 4.11. In summary the Severn Estuary site is a large estuary with extensive Intertidal mud flats and sand flats, rocky platforms and islands. Saltmarsh fringes the coast backed by grazing marsh with freshwater ditches and occasional brackish ditches. The site is of importance during the spring and autumn migration periods for waders, as well as in winter for large numbers of waterbirds, especially swans, ducks and waders. The fish fauna is very diverse and the site also supports marine worms forming an important food source for waders and fish. The site is of particular importance for migratory fish.
- 4.12. The Severn Estuary Site Improvement Plan (SIP) identifies a number of issues of which the ones most likely to relate to development is (1) public access/disturbance to wildfowl and (2) impacts of development. The identified measures for these are to 1) identify/reduce impacts of disturbance to birds and damage to habitats, and 2) inform strategic planning decisions to minimise impact of development. Account of those points has been taken in table 4 below.
- 4.13. The Neighbourhood Area boundary and North Somerset District Boundary lie along the southern side of the River Avon. The designations are however also continued across the River Avon within the Bristol City Council Boundary. This HRA screening acknowledges that effect on the designations within the neighbourhood area and also the wider designations must both be taken into account.
- 4.14. The Royal Portbury Dock has extensive landholdings on the edge of the Severn Estuary and abutting the Severn Estuary site. None of the Neighbourhood Plan proposals affect the area of the Port.

Special Areas of Conservation outside the Severn Estuary Site

Avon Gorge Woodlands

- 4.15. Part of the Avon Gorge Woodland SAC lies within the south eastern boundary of the Neighbourhood Area. Screening for the Avon Gorge Woodlands SAC description and priorities are taken from the Site Improvement Plan (SIP).
- 4.16. The Avon Gorge Woodlands SAC is good example of Tilio-Acerion forests in south-west England. It is important because of the high concentration of Small-leaved lime *Tilia cordata* and the presence of rare whitebeams *Sorbus* spp., including at least two which are unique to the Avon Gorge (*S.bristolensis* and *S. wilmottiana*), and other nationally scarce plants, such as Angular Solomon's-seal *Polygonatum odoratum*.
- 4.17. The associated species-rich transitions to scrub and herb-rich calcareous open limestone grassland often found on cliff ledges support a high number of Nationally Rare and Scarce species, such as Bristol rock-cress *Arabis scabra*, round-headed leek ('Bristol onion') *Allium sphaerocephalon* and honewort *Trinia glauca*.
- 4.18. Part of the Leigh Woods side of the SAC is considered to be an important remnant wood pasture habitat which was managed as a wood pasture for many hundreds of years. This is shown by the presence of large numbers of veteran pollards, which are also highly likely to be important for saproxylic invertebrates.
- 4.19. The SIP identifies the following priorities and issues: invasive species, undergrazing, public access/disturbance, disease, changes in species distributions, and air pollution: impact of atmospheric nitrogen deposition.
- 4.20. It is not considered that the priorities and issues relate to policies or proposals within the Neighbourhood Plan.

North Somerset and Mendips Bat SAC consultation zones

- 4.21. No part of the neighbourhood area falls within the Bat SAC itself-the consultation zones are set out in the North Somerset Council Bat SAC guidance on development SPD adopted 2018. The SPD is intended as a guide to developers at project level.
- 4.22. The SPD was adopted in 2018 and therefore postdates the adoption of the North Somerset Core Strategy.
- 4.23. The Bat SAC is important for two bat species, Greater and Lesser Horseshoe bats. The SAC itself comprises component SSSIs which in North Somerset include, for example, the two maternity roosts at the Brockley Hall Stables SSSI and King's Wood SSSI, and also hibernation roosts like the Banwell Bone

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Caves and, in Somerset, the maternity and hibernation roosts in the Cheddar Complex SSSI and the hibernation roosts at Wookey Hole SSSI.

- 4.24. However the landscapes around the SAC itself are also important in providing foraging habitat needed to maintain the favourable conservation status of the horseshoe bats. Therefore the SPD guidance sets out strong requirements for consultation, survey information and appropriate mitigation, to demonstrate that development proposals will not adversely impact on the designated bat populations.
- 4.25. The “Bat Consultation Zone” are areas where horseshoe bats may be found, divided into bands reflecting the density at which horseshoe species may be found at a distance from a roost site-A (most sensitive/greater density), B and C (potentially least sensitive lower densities), reflecting the likely importance of the habitat for the bats and proximity to maternity and other roosts. These are largely based on the distances recorded through radio tracking studies at Brockley Hall Stables and Cheddar Caves and research into densities of occurrence throughout the species range. Within the Consultation Zone development is likely to be subject to particular requirements, depending on the sensitivity of the site. It sets out where surveys will be needed to identify likely impacts on bat populations.
- 4.26. The Conservation Objectives for the SAC2 are: With regard to the SAC and the natural habitats and/or species for which the site has been designated (the ‘Qualifying Features’ which include the bat species listed above), and subject to natural change, 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:
- The extent and distribution of qualifying natural habitats and habitats of qualifying species;
 - The structure and function (including typical species) of qualifying natural habitats;
 - The structure and function of the habitats of qualifying species;
 - The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely;
 - The populations of qualifying species; and,
 - The distribution of qualifying species within the site.
- 4.27. The habitats and features which support the populations of SAC bats outside the designated site are considered a material consideration in ensuring the integrity of the designated site.
- 4.28. Within the Bat Consultation Zone, where SAC bats would be affected or potentially affected by development appropriate mitigation will be required. The

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aim should be to retain and enhance habitat and features of value to horseshoe bats. Where this is not possible replacement habitat may be needed.

- 4.29. Much of North Somerset is covered by the consultation zones with the zones in the vicinity of the Avon Gorge also including areas within Bristol City Council.
- 4.30. As the Bat SAC consultation zones are intended to be a project level tool they are of relevance to any development occurring within the neighbourhood plan area which lies within these zones. The Pill and District Neighbourhood Plan does not directly propose any development within these zones. The two site allocations for housing lie outside the horseshoe bat zone C. Policy CAF2 which supports the development or refurbishing of the Pill precinct lies within zone C as does the majority of the western side of pill and Easton-in-Gordano.

HRA Screening of the Pill and District Plan

- 4.31. Section 2 above sets out the scope of the Pill and District Plan. Considering the existing policy context and scope of the plan, it is unlikely that Pill and District Neighbourhood Plan policies could potentially have a significant effect on any of the above designations.
- 4.32. An explanation of the categorisation of effects is set out in table 3. The screening assessment of each policy is shown below in table 4.

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Table 3
Categorisation of effects

Category	Sub category	Description
1. No negative effect	A	Policy/proposal will not lead directly to development in that it relates to design or other qualitative criteria, or it is not a land-use planning policy.
	B	Policy/proposal intended to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any negative effect on a European Site.
	C	Policy/proposal is similar to existing Local Plan policy which has been assessed as having no negative effects by an HRA.
2. No significant effect		No significant effect either alone or in combination with other plans or projects, because effects are trivial or minimal.
3. Likely significant effect alone		Policy could indirectly affect a European Site, because it provides for, or steers, a quantity or type of development that may be very close to it, or ecologically, hydrologically or physically connected to it, or it may increase disturbance as a result of increased recreational pressure.

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Category	Sub category	Description
4. Likely significant effect in combination		The policy alone would not be likely to have significant effects but its effects are combined with the effects of other policies or proposals provided for or coordinated by the relevant plans or projects the cumulative effects would be likely to be significant.

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**Table 4
Assessment of likely significant effects on European sites affecting North Somerset through implementation of the Pill and District Neighbourhood Plan**

Plan Policy and proposals		Severn Estuary site (RAMSAR, SPA, SAC)	Avon Gorge Woodland SAC	Bat consultation zones
HO 1 Site Allocation	Brownfield site Care Home + 24 houses	2	2	2
HO 2 Site allocation	Affordable Housing exception site	2	2	2
HO 3	Requirement for energy assessment	1.A	1.A	1.A
HO4	Appropriate infill development	1.C	1.C	1.C
T1	Walking and cycling	1.A	1.A	1.A
T2	Public bus transport	1.A	1.A	1.A
T3	Minimise pollution impacts from new development	1.B	1.B	1.B
T4	Protection of public rights of way	1B	1.B	1.B
T5	Electric vehicle use	1.A	1.A	1.A
T6	Pedestrian and cyclists safety in areas 3 and 4	1.A	1.A	1.A

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Plan Policy and proposals		Severn Estuary site (RAMSAR, SPA, SAC)	Avon Gorge Woodland SAC	Bat consultation zones
T7	Considerations of re-opening of Portishead rail link	1.C	1.C	1.C
Env1	Protect sensitive landscape area above Crockerne Drive and Brookside	1.B	1.B	1.B
Env2	Protection of open space, rich grassland and verges as wildlife habitats	1.B	1.B	1.B
Env3	Protection of natural environment of Royal Portbury Dock	1.B	1.B	1.B
Her 1	Consideration of historic environment in development proposals	1.B	1.B	1.B
Her 2	Potential conservation area for Abbots Leigh	1.B	1.B	1.B
Emp 1	Domestic extensions for homeworking	1.A	1.A	1.A
Emp 2	Conversion and re-use of	1.C	1.C	1C

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Plan Policy and proposals	Severn Estuary site (RAMSAR, SPA, SAC)	Avon Gorge Woodland SAC	Bat consultation zones
redundant buildings for employment uses			
Emp 3 Protection of existing employment uses	1.C	1.C	1.C
Emp 4 Redevelopment of Brownfield site Orchard View	1.D	1.D	1.D
Emp 5 Upgrading of digital infrastructure	1.A	1.A	1.A
CC 1 Support for proposals to enhance carbon capture and ecological biodiversity	1.B	1.B	1.B
CC 2 Domestic solar panels	1.B	1.B	1.B
CC 3 Renewable energy incorporated into development proposals	1.A	1.A	1.A
CC 4 Investigation of local wind-turbine generation	2 Policy only suggests investigation which would include	2 Policy only suggests investigation which would include	2 Policy only suggests investigation which would include

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Plan Policy and proposals		Severn Estuary site (RAMSAR, SPA, SAC)	Avon Gorge Woodland SAC	Bat consultation zones
		environmental considerations	environmental considerations	environmental considerations
CAF 1	Protection of open spaces	1.B	1.B	1.B
CAF 2	Support for Improvement of Pill Precinct	1.B	1.B	1.B
CAF 3	Support for further sports/recreational uses on Beggar Bush Lane	1.C	1.C	1.C

Conclusion with respect to HRA screening

4.33. As set out in table 4 there are unlikely to be any significant adverse effects on SAC, SPA or RAMSAR sites from the Pill and District neighbourhood plan.

5. Conclusions-screening outcomes

- 5.1. SEA-As a result of the assessment in section 3 above it can be concluded that there are not likely to be significant environmental effects arising from the Abbots Leigh, Ham Green, Pill and Easton-in-Gordano Neighbourhood Plan.
- 5.2. HRA-As a result of the assessment in section 4 above it is unlikely that there will be any significant effects on protected species or their habitats and therefore a full HRA is not required.
- 5.3. These assessments have been undertaken at draft plan stage and therefore if any changes are made to the plan post consultation then these should be considered and a revised screening completed as necessary.

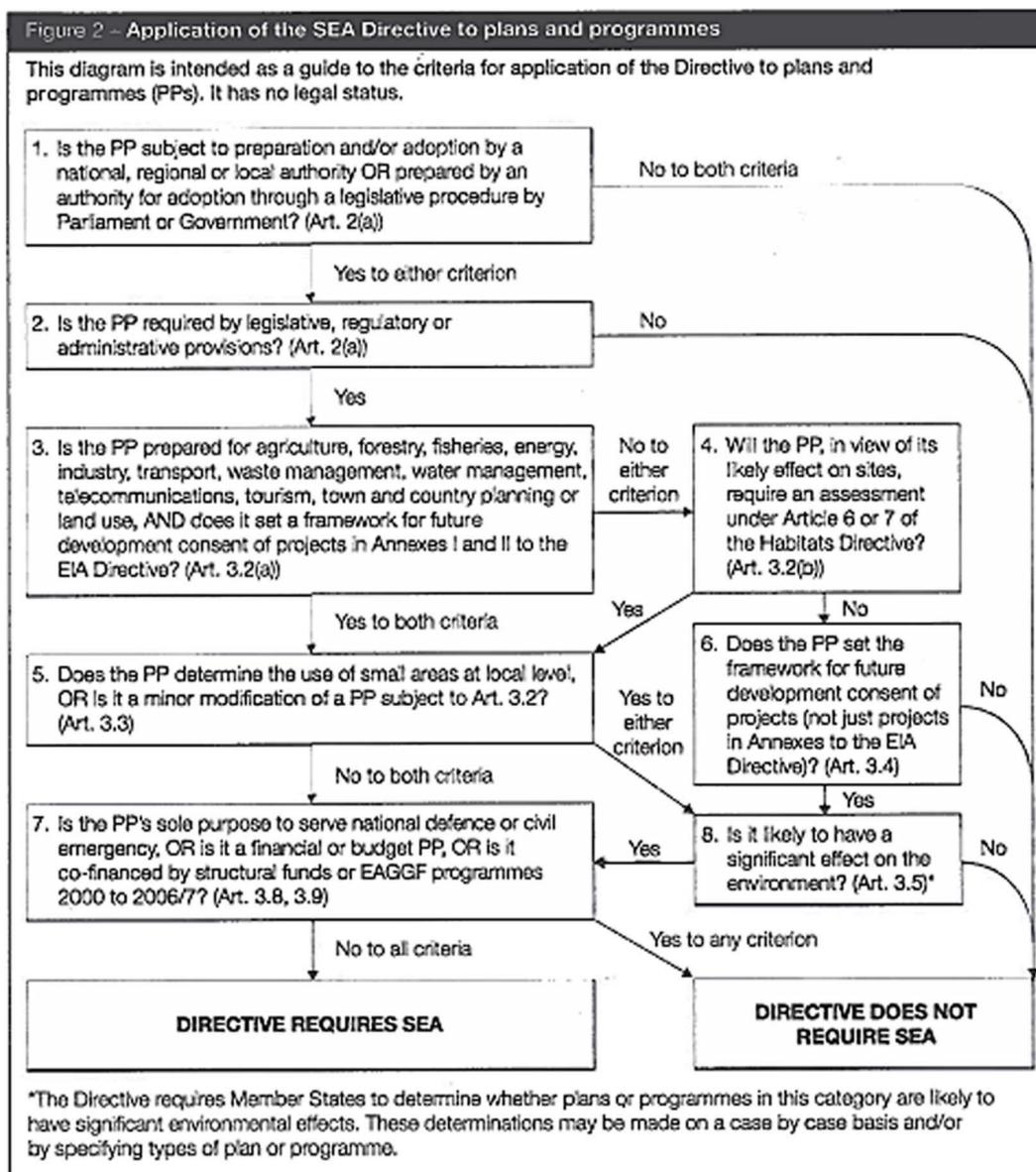
**Strategic Environmental Assessment (SEA)
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Appendices

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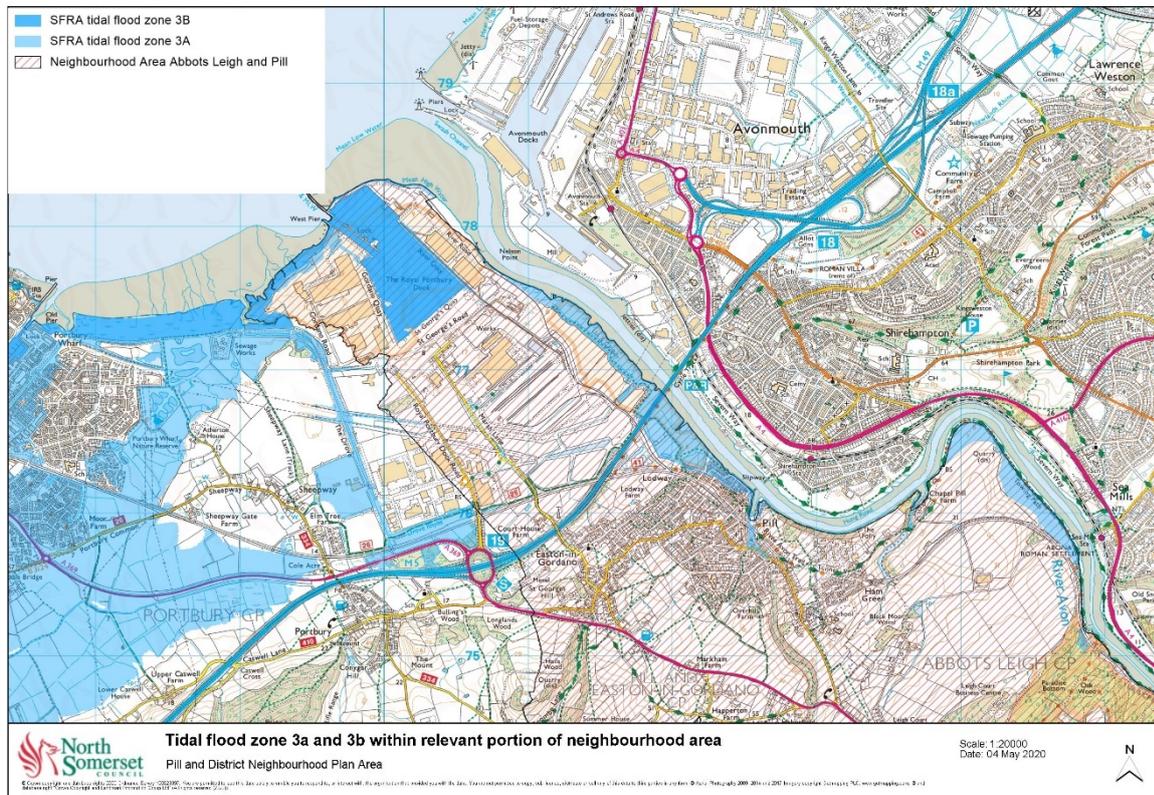
Appendix 1

Application of the SEA Directive to the Abbots Leigh, Ham Green, Pill and Easton-in-Gordano Neighbourhood Plan

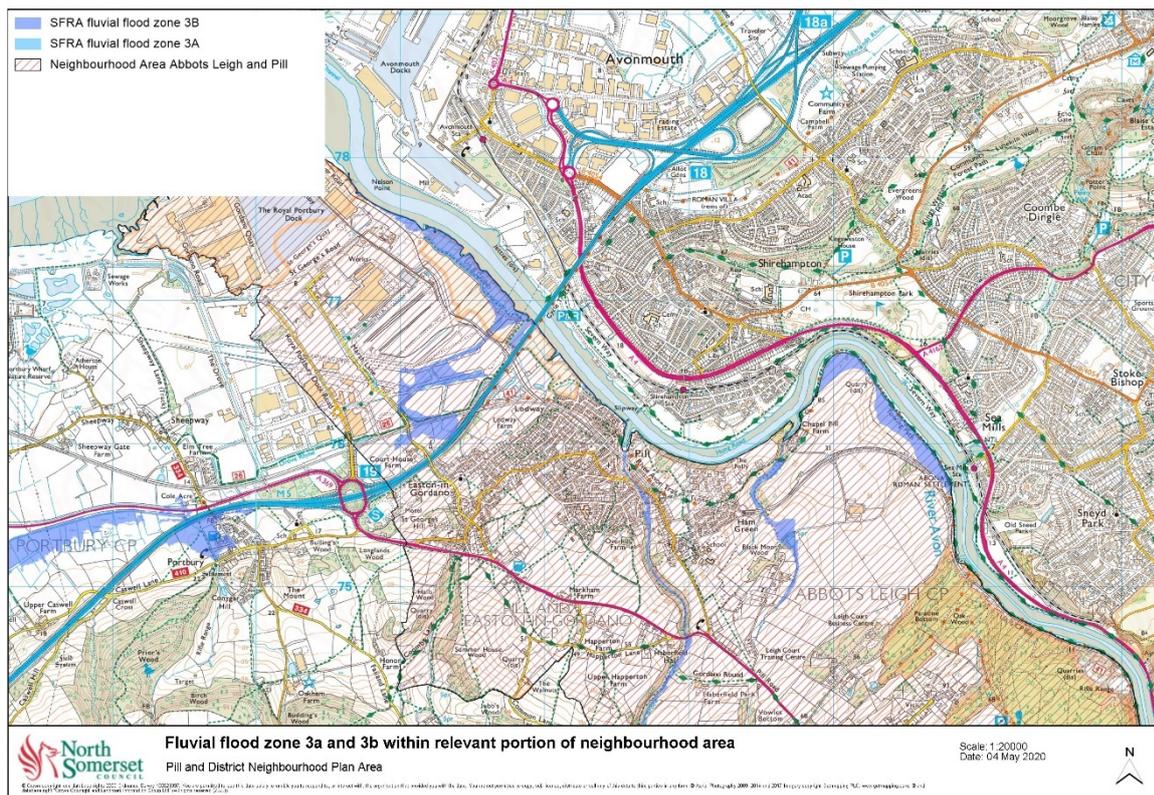


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Appendix 2a Tidal flood zones 3a and 3b



Appendix 2b Fluvial Flood District Neighbourhood Plan 3a and 3b



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**Appendix 3c
Heritage Impact Assessment for allocated sites in Pill Neighbourhood Plan**

September 2020

Site Location	Heritage asset	Potential impact	Information required for any Future Planning Applications
H01 Orchard View	Grade II Listed - Administrative block, and 2 flats to Ham Green Hospital Ham Green Easton-in-Gordano	The site is within the wider setting of this listed building, development of this site is unlikely to harm this setting providing tall buildings are not developed on this site.	Heritage Impact Assessment
	Grade II Listed - Eighteenth Century Watergate at ST532 758 Ham Green Easton-in-Gordano	The site is within the wider setting of this listed building, development of this site is unlikely to harm this setting providing tall buildings are not developed on this site.	Heritage Impact Assessment
	Unregistered Historic Park or Garden - Ham Green Hospital	The top part of the site is adjacent to the designed woodland associated with the late 18th century pleasure park and ground laid out for Richard Bright.	Heritage Impact Assessment and LVIA

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Site Location	Heritage asset	Potential impact	Information required for any Future Planning Applications
		<p>Providing the any development of the site is well designed the harm to this asset will be avoided</p> <p>Policy DM5 and section 197 of the NPPF will need to be complied with.</p>	
	Site has a low to moderate potential for archaeology	<p>Known area of medieval pottery production relating to Ham Green ware – potential for kilns/associated activity.</p> <p>Palaeolithic implement recovered c. 100m SW of site.</p> <p>Ridge and furrow identified in the field adjacent to the site.</p> <p>Policy DM6 and section 189 of the NPPF will need to be complied with.</p>	Archaeological Desk Based Assessment
H02 Chapel Pill Lane	Grade II Listed - Administrative block, and 2 flats to Ham Green Hospital Ham Green Easton-in-Gordano	<p>The site lays within the wider setting of this designated heritage asset.</p> <p>A well-designed site would have a low impact on the setting of the nearby listed building</p>	Heritage Impact Assessment

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Site Location	Heritage asset	Potential impact	Information required for any Future Planning Applications
		<p>due it is separation from the building by the road. Development of the site would not harm the setting of the listed building providing the scale of the buildings are at a domestic level and the site layout allows for an open green buffer at the road edge of the site ensuring view toward and from the main listed building to the associated landscape are retained.</p> <p>Part I section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990, Policy DM4 and paragraph 196 will need to be complied with.</p>	
	<p>Grade II Listed - Gazebo 25 yards north-east of administrative block of Ham Green Hospital</p>	<p>The site is within the wider setting of this listed building, development of this site is unlikely to harm this setting providing tall buildings are not developed on this site.</p>	<p>Heritage Impact Assessment</p>
	<p>Grade II Listed- Eighteenth Century Watergate at ST532 758 Ham Green Easton-in-Gordano</p>	<p>The site is within the wider setting of this listed building, development of this site is unlikely to harm this setting providing tall buildings are not developed on this site.</p>	<p>Heritage Impact Assessment</p>

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Site Location	Heritage asset	Potential impact	Information required for any Future Planning Applications
	Grade II Registered Historic Park or Garden - Leigh Court	<p>The site lies within the wider setting of this designated heritage asset. The development has a small chance of causing potential harm to the setting of the registered park however well-designed proposals which protect key views concerning the asset and ensure the buildings on the site are consistent with the urban grain and scale of the area, would avoid any harm to the wider setting of this heritage asset.</p> <p>Policy DM5 and paragraph 196 of the NPPF need to be complied with.</p>	Heritage Impact Assessment and LVIA
	Unregistered Historic Park or Garden - Ham Green Hospital	<p>This site lies directly in this local heritage asset, Ham Green Hospital garden is a Late C18 pleasure grounds and park, laid out for Richard Bright, chemist and horticulturalist. Remaining features include fine serpentine lake; 'Adam and Eve' folly on riverbank; Gothic hexagonal gazebo in rubble and freestone 1789; ha-ha; stable block; three</p>	Heritage Impact Assessment and LVIA

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Site Location	Heritage asset	Potential impact	Information required for any Future Planning Applications
		<p>walls of kitchen garden; woodland; specimen trees from Bright's time and later.</p> <p>The proposed development will harm this local heritage asset. This can be minimised by the sensitive development of the site in its design, layout and materials so minimising any loss of significance to it and enhance it where possible. Some residual harm may still however result.</p> <p>Any harm to this asset will need to be weighed in line with its significance in terms of policy DM7 and paragraph 197 of the NPPF</p>	
	<p>Moderate potential for archaeology</p>	<p>There are a number of known archaeological sites within the area of this site including medieval fishponds to the east. Medieval pottery kilns and associated activity have been found in that area and there is also evidence of a medieval wharf known as the Hung Road to the north-east of the site.</p>	<p>Archaeological Desk Based Assessment and a geophysical survey of the site will also be required, along with a programme of further investigation in the form of targeted trench evaluation</p>

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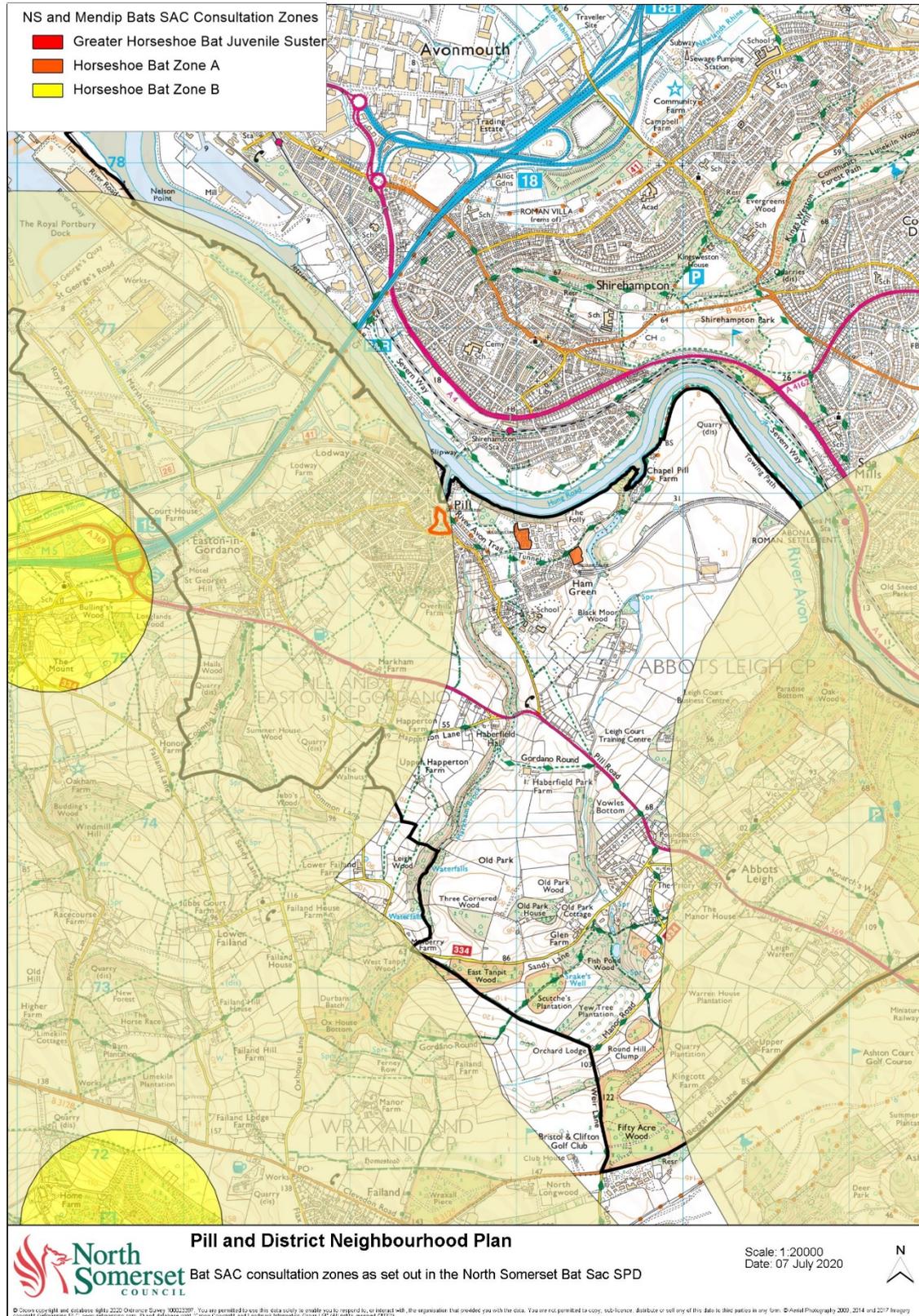
Site Location	Heritage asset	Potential impact	Information required for any Future Planning Applications
		<p>In the same field as the medieval pottery kilns, two Lower Palaeolithic bifacial implements were recovered from a ploughed surface. A further findspot is located to the north-west of the site. There is also a square banked enclosure of unknown date, as well as post-medieval pottery findspots to the south-west. Remnants of ridge and furrow have also been identified to the north-west of the site, indicating agricultural activity during the medieval period.</p> <p>Paragraph 189 of the NPPF and policy DM6 and policies DM 7 and paragraph 197 of the NPPF need to be complied with.</p>	<p>dependent on the results of the survey.</p>

Overall some residual harm may be caused to the local heritage asset of the Unregistered Historic Park or Garden (Ham Green Hospital) from the allocated sites, but due to the significance of this heritage asset and the location of the specific allocated site within this it is unlikely to result in substantial harm. Providing the development of these sites is at a domestic scale with site layouts which reflect the landscape it is unlikely any heritage assets of national importance will be affected by future development at either of the proposed allocated sites. Therefore, a Strategic Environment Assessment (SEA) in terms of heritage is not required as part of the neighbourhood plan process.

Assessment undertaken by: Conservation and Heritage Officer, North Somerset Council - September 2020

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Appendix 4b North Somerset and Mendip Bat SAC consultation zones



Appendix 4c

Details and qualifying features or Severn Estuary Site and Avon woodlands SAC

Details on the Severn Estuary site (SAC, SPA, Ramsar)

Conservation objectives for SAC, SPA

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

Qualifying features for SAC:

H1110. Sandbanks which are slightly covered by sea water all the time; Subtidal sandbanks

H1130. Estuaries

H1140. Mudflats and sandflats not covered by seawater at low tide; Intertidal mudflats and sandflats

H1170. Reefs

H1330. Atlantic salt meadows (*Glauco-Puccinellietalia maritimae*); Atlantic salt meadows

S1095. *Petromyzon marinus*; Sea lamprey

S1099. *Lampetra fluviatilis*; River lamprey

S1103. *Alosa fallax*; Twaite shad

Qualifying Features for SPA:

A037 *Cygnus columbianus bewickii*; Bewick's swan (Non-breeding)

A048 *Tadorna tadorna*; Common shelduck (Non-breeding)

A051 *Anas strepera*; Gadwall (Non-breeding)

A149 *Calidris alpina alpina*; Dunlin (Non-breeding)

A162 *Tringa totanus*; Common redshank (Non-breeding)

A394 *Anser albifrons albifrons*; Greater white-fronted goose (Non-breeding)

Waterbird assemblage

Details on Avon Gorge Woodlands SAC

EC Directive 92/43 on the Conservation of Natural Habitats and of Wild Fauna and Flora

Citation for Special Area of Conservation (SAC)

Name: Avon Gorge Woodlands

Unitary Authority/County: City of Bristol, North Somerset

SAC status: Designated on 1 April 2005

Grid reference: ST560741

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SAC EU code: UK0012734

Area (ha): 152.35

Component SSSI: Avon Gorge SSSI

Site description:

The Avon Gorge is in south-west England. Natural cliffs, quarries and scree of Carboniferous limestone dramatically rise about 100m either side from the tidal River Avon, with grassland and woodland where slopes are less sheer. The site is important because of the small-leaved lime *Tilia cordata* woodland and the associated species-rich transitions to scrub and herb-rich calcareous grasslands. The open limestone grassland and cliff ledges support a high number of uncommon species, including rare whitebeams *Sorbus* spp., with two unique to the Avon Gorge, *S. bristoliensis* and *S. wilmottiana*, and other important plants, such as Bristol rock-cress *Arabis scabra* and honewort *Trinia glauca*. Small groves of yew *Taxus baccata* also occur on some of the stonier situations.

Qualifying habitats: The site is designated under article 4(4) of the Directive (92/43/EEC) as it hosts the following habitats listed in Annex I:

- *Tilio-Acerion* forests of slopes, screes and ravines (mixed woodland on base-rich soils associated with rocky slopes)*
- Semi-natural dry grasslands and scrubland facies: on calcareous substrates (*Festuco-Brometalia*) (dry grasslands and scrublands on chalk or limestone)

Annex I priority habitats are denoted by an asterisk (*)

Conservation objectives

With regard to the SAC and the natural habitats and/or species for which the site has been designated (the 'Qualifying Features' listed below), and subject to natural change;

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;

- 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

This document should be read in conjunction with the accompanying Supplementary Advice document, which provides more detailed advice and information to enable the application and achievement of the Objectives set out above.

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Qualifying Features:

- H6210. Semi-natural dry grasslands and scrubland facies: on calcareous substrates ([Festuco-Brometalia](#)); Dry grasslands and scrublands on chalk or limestone
- H9180. [Tilio-Acerion](#) forests of slopes, screes and ravines; Mixed woodland on base-rich soils associated with rocky slopes*

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and Habitats Regulation Assessment Screening Report**

**Appendix 5
Consultation body responses to July 2020 screening**

Date: 07 August 2020
Our ref: 323332
Your ref: SEA / HRA Screening



Celia Dring
North Somerset Council
Town Hall
Walliscote Grove Road
Weston-super-Mare, BS23 1UJ
BY EMAIL ONLY
celia.dring@n-somerset.gov.uk

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ
T 0300 060 3900

Dear Ms Dring

Pill and District Neighbourhood Plan - SEA / HRA Screening

Thank you for your consultation on the above dated 07 July 2020 which was received by Natural England on the same date.

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

Screening Request: Strategic Environmental Assessment

It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan.

Neighbourhood Plan

Guidance on the assessment of Neighbourhood Plans, in light of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended), is contained within the National Planning Practice Guidance. The guidance highlights three triggers that may require the production of an SEA, for instance where:

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- 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.

We have checked our records and based on the information provided, we can confirm that in our view the proposals contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect.

We are not aware of significant populations of protected species which are likely to be affected by the policies / proposals within the plan. It remains the case, however, that the responsible authority should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected.

Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SA/SEA is necessary.

Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SEA/SA screening stage, should the responsible authority seek our views on the scoping or environmental report stages. This includes any third party appeal against any screening decision you may make.

Habitats Regulations Assessment Screening

Natural England welcomes the consideration given to the Habitats Regulations. We agree with the report's conclusions that the Pill and District Neighbourhood Plan would not be likely to result in a significant effect on any European Site, either alone or in combination and therefore no further assessment work would be required.

For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Victoria Kirkham

Consultations Team

Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment Screening Report

From: Bull, Richard <richard.bull@environment-agency.gov.uk>
Sent: Tuesday, July 21, 2020 10:54 AM
To: Celia Dring <Celia.Dring@n-somerset.gov.uk>
Subject: SEA screening opinion Pill and District neighbourhood plan

Hi Celia,

Further to our telephone conversation and correspondence dated 20 July 2020 concerning the above screening opinion, I can provide further clarification.

The Environment Agency accepted that a SEA would not be required for this Neighbourhood Plan, even though it was proposed that the Pill Precinct mixed use development was to be assessed. We believe that a SEA would be unnecessary for Pill Precinct as part of this site lies within Flood Zone 3b, and would therefore not be in accordance with Government advice, the National Planning Policy Framework (NPPF).

Whatever the outcome of a SEA for Pill Precinct the Environment Agency would always object to a development within Flood Zone 3b unless the proposal was deemed “water compatible” or “essential infrastructure”, and in accordance with the NPPF, or if evidence can be provided confirming that the site does not lie within Flood Zone 3b.

I hope this provides clarification, if you wish to discuss I can be contacted on the number below.

Kind regards

Richard

Richard Bull

Planning Advisor

Sustainable Places Team (Wessex Area)

e-mail nwx.sp@environment-agency.gov.uk

✉ Environment Agency | Rivers House | East Quay | Bridgewater | Somerset | TA6 4YS

☎ Tel 0203 025 0287 Int 50287

💻 www.gov.uk/environment-agency

Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment Screening Report

From: Stuart, David <David.Stuart@HistoricEngland.org.uk>
Sent: Wednesday, September 9, 2020 7:43 PM
To: Celia Dring <Celia.Dring@n-somerset.gov.uk>
Cc: Kate Hudson-McAulay <Kate.Hudson-McAulay@n-somerset.gov.uk>
Subject: RE: Pill district NP NS Cons Officer heritage report 7.9.20_

Many thanks Celia

I appreciate that Kate may have gone as far as she is comfortable with in drafting her advice.

Although Kate doesn't allude to the quanta of development proposed for each site in their respective allocation policies I get the impression that she doesn't think that is likely to be a problem so much as development height.

On this basis I am happy to defer to her judgement and the view that if developed as per her advice the allocation of the sites, and thereby the Plan, is unlikely to cause significant environmental effects.

I can therefore confirm that we have no objection to the view that a full SEA is not required.

At the same time this all perhaps reinforces the impression that the Plan in its drafting of the respective policies and its evidence base may benefit from review, refinement or enhancement in order to ensure that what will constitute acceptable development for each site is appropriately defined.

Kind regards

David

David Stuart | Historic Places Adviser South West

Direct Line: 0117 975 0680 | Mobile: 0797 924 0316

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From: Stuart, David <David.Stuart@HistoricEngland.org.uk>

Sent: Friday, July 24, 2020 4:29 PM

To: Celia Dring <Celia.Dring@n-somerset.gov.uk>

Subject: SEA screening opinion Pill and District neighbourhood plan

Dear Celia

Thank you for your consultation on the SEA Screening Opinion for the emerging Pill and District Neighbourhood Plan. This consultation has coincided with that from the community on its Draft Plan so we are able to draw upon information associated with the latter exercise on its website to inform our response to the former.

The focus of our attention is policies HO1 & HO2 which allocate sites for residential development. Neither the Plan or the supporting documents on its website provide evidence that the sites have been assessed for their potential to impact on the significance of heritage assets. We appreciate that HO1 is a brownfield site where the principle of redevelopment is unlikely to be an issue but there may be relationships with on- or offsite assets which should specifically inform the nature of any development and be reflected in the policy itself. In that respect it is unclear that either site can accommodate the quantum of development referred to within their respective policies without causing harm to the historic environment.

The only heritage evidence therefore available to us is that included within the SEA Screening Report itself. This asserts that neither site will adversely affect designated and undesignated heritage assets and refers to Appendices 3a & 3b which contain graphic information showing the distribution of identified designated heritage assets and the potential settings of Grade I and II* Listed buildings. However, there is no explanation as to how the settings have been determined, why the settings of other assets hasn't been identified, and whether the absence of reference to other types of heritage assets, such as Scheduled Monuments or undesignated assets, is due to absence, irrelevance to the sites in question, or oversight.

If the information provided can be substantiated then it may well be that a full SEA would not be required for heritage reasons. But unfortunately we do not believe that what has been made available is sufficient to support the conclusion that the Plan is not likely to generate significant environmental effects from a heritage perspective.

Our response to the community on its draft Plan is likely to echo the need for evidence to demonstrate that its proposed site allocations as drafted in the respective policies can be delivered without causing harm to heritage assets. Given the limited number of assets in the area and their disposition relative to the proposed sites any exercise to address this exercise is probably a straightforward undertaking although informed heritage judgement may still be desirable.

As we have advised on other Plans in such situations, a simple expedient may be to obtain written confirmation from your authority's conservation officer that the sites in

Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment Screening Report

question can be delivered as envisaged without causing harm to heritage assets. This can then be added to the Plan's evidence base.

There are no issues for us associated with the CAF policies as we believe the broad nature of these allows for delivery to appropriately accommodate relevant heritage considerations and their protection and enhancement through complementary and overarching policies.

We would be happy to review our position and advice should more information be made available.

Kind regards

David

David Stuart | Historic Places Adviser South West

Direct Line: 0117 975 0680 | Mobile: 0797 924 0316

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