



Strategic Environmental and Habitats Regulations Assessments Screening Report

Down Ampney Neighbourhood Plan

November 2021

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|--|-----------|
| Introduction..... | 3 |
| Legislative Background | 4 |
| Strategic Environmental Assessment (SEA) | 4 |
| Habitats Regulations Assessment (HRA) | 4 |
| Screening Process | 5 |
| SEA Screening..... | 5 |
| HRA Screening..... | 8 |
| Assessment- Gathering data | 9 |
| HRA – Area of Search Map..... | 9 |
| Environmentally ‘Sensitive’ Areas Map | 10 |
| Water Map..... | 12 |
| Historic Areas Map; | 15 |
| Landscape Map | 16 |
| Assessment – HRA..... | 18 |
| Cotswold Local Plan HRA..... | 18 |
| Are there likely significant effects?..... | 18 |
| Assessment – SEA | 21 |
| Is an SEA required? | 21 |
| Are there likely significant Effects? | 25 |
| Conclusion | 30 |
| Appendix 1 | 31 |
| Appendix 2..... | 32 |
| Appendix 3..... | 33 |

Introduction

- 1.1 This screening report is designed to determine whether or not the content of the Down Ampney Neighbourhood Development Plan or NDP (Draft Pre-Reg 14, Version 4, June 2021 - attached) requires a Strategic Environmental Assessment (SEA) in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004 (or the 'SEA Regulations').
- 1.2 It also includes an assessment of whether a Habitats Regulation Assessment (HRA) in accordance with The Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations') as amended, would be required.
- 1.3 The Down Ampney Neighbourhood Plan is being prepared, to set out the vision for the area and the planning policies for use and development of land within the Neighbourhood area.
- 1.4 The designated area covered by the NDP is the Parish of Down Ampney, which includes the village of Down Ampney itself, and lies part adjacent to the Wiltshire District border to the south of Cotswold District. Down Ampney village is identified in the Local Plan as a 'Principal Settlement' and is allocated three sites for residential development within its development boundary. The allocations lie within the sensitive groundwater Source Protection Zone (SPZ1) for Meysey Hampton Public Water Abstraction. The Parish also includes a conservation area, scheduled monuments, listed buildings including a Grade 1 Listed Church, a non-designated Local wildlife site, priority habitats and strategic nature area.
- 1.5 The Parish is within The Cotswold Water Park (CWP) designation, a broad area of sand and gravel extraction, which includes an extensive series of artificial lakes, supporting recreation and wildlife. All the lakes of the CWP have recently achieved Sites of Special Scientific Interest (SSSI) status, although none lie within the Parish boundary. Also beyond the Parish boundary, Fairford (RAF/USAF) Air Base lies to the east and a Special Area of Conservation (SAC) as listed in the Habitats Directive, lies to the south west.
- 1.6 The Neighbourhood Plan is being prepared in the context of the [Cotswold District Local Plan 2011-2031](#). The Local Plan was adopted by the Council in August 2018 having been through Independent Examination. The Development Plan for the area will comprise both the Cotswold District Local Plan and (when 'made') the Down Ampney Neighbourhood Plan, and will be used to help determine planning applications and appeals.
- 1.7 The Vision for Down Ampney is based on key issues raised by local people and includes; a vibrant community with a stronger network of facilities and services whilst ensuring the character and landscape are conserved and enhanced; retaining a balance of historical buildings and features alongside sympathetic new developments, and respecting local vernacular and connection with the surrounding countryside.
- 1.8 The Down Ampney draft Neighbourhood Plan considers, amongst others, the following objectives;
 - Designating Local Green Spaces
 - Protecting rural aspects of the village and surrounding countryside, including key vistas
 - Maintaining current facilities, increasing footpaths and cycleways; and promoting access to the countryside throughout the Parish
 - To ensure the infrastructure is enhanced for current and future residents, such as drainage surface water and foul water, to support sustainable growth.
 - Ensuring new development has a mix of housing types, appropriate for a rural area, and which takes into account climate change
- 1.9 The Plan does not seek to allocate land for development. It does provide local guidance on how applications for development in the plan area should be determined.
- 1.10 The legislation set out below outlines the regulations that require the need for a screening exercise.

Legislative Background

Strategic Environmental Assessment (SEA)

- 1.11 Establishing whether a neighbourhood plan requires an environmental assessment is an important legal requirement and forms part of the neighbourhood planning process.
- 1.12 In order to be ‘made’ neighbourhood plans are required to be tested against and meet a number of ‘basic conditions’ set out in the Localism Act 2011 ([Appendix 2](#)). One of the basic conditions is whether the Neighbourhood Plan is compatible with European Union obligations, including those under the SEA Directive and Habitats Directive¹ as translated in to English law, under the SEA Regulations 2004 and Habitats Regulations 2017 (See also [National Planning Policy Guidance](#))
- 1.13 Neighbourhood Plans in England require SEA if their effects are likely to be significant, or if the plan requires appropriate assessment under Habitats Regulations Assessment (HRA). While screening for SEA and HRA is a parallel process, both are integrated here into one report.
- 1.14 Neighbourhood Development Plans (NDPs) are not required to undertake the type of sustainability appraisal required for a Local Plan. However NDPs may require a strategic environmental assessment (SEA) of the Plan in accordance with European Directive 2001/42/EC or ‘SEA Directive’. This was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004 or the ‘SEA Regulations’. Regulation 9 sets out the requirements to assess (screen) the plan, and includes a requirement to consult the environmental assessment consultation bodies.
- 1.15 The Local Plan was subject to a full, comprehensive Sustainability Appraisal (SA) including SEA, which has considered the significant environmental, economic and social effects of the Local Plan for the District. A neighbourhood plan might require SEA if it is likely to have significant environmental effects that have not already been considered and dealt with through a SA of the Local Plan. The [SA Report](#) itself and associated documents, that accompanied the Local Plan to Examination can all be found on the Local Plan webpages: <https://www.cotswold.gov.uk/planning-and-building/planning-policy/local-plan-2011-to-2031/>

Habitats Regulations Assessment (HRA)

- 1.16 The Habitats Directive 92/43/EEC is another key obligation and requires that any plan or project likely to have a significant effect on a European Site must be subject to an ‘appropriate assessment,’ rather than just screening. The effectiveness of measures to mitigate the impact of the plan, on sites protected by the Habitats Directive, should also be tested through full appropriate assessment, rather than just screening (EU Court of Justice ruling in People Over Wind and Sweetman v Coillte Teoranta, April 2018).
- 1.17 The Habitats Directive was transposed into English law by the ‘Conservation of Habitats and Species Regulations (as amended) 2017’ or Habitats Regulations. HRA is the screening assessment (Reg 106(1)) of the likely effects, or impacts, of a land use proposal against the conservation objectives of

¹ The SEA Regulations (2004) and HRA Regulations (2017), which previously implemented the requirements of the SEA/HRA EU Directives in England, will continue to apply as before, unless or until new legislation is introduced. The Regulations remain in force notwithstanding the UK's withdrawal from the European Union. The EU Directives from which the UK's Habitats and SEA Regulations originally derived are no longer binding. https://www.theplanner.co.uk/decision/appeal-nitrate-neutrality-policy-scuppers-chiropractor-conversion?utm_source=Adestra&utm_medium=email&utm_term=; <https://neighbourhoodplanning.org/toolkits-and-guidance/understand-plan-requires-strategic-environmental-assessment-sea/>

European sites; and considers whether or not a proposal (alone or in combination) is likely to be significant.

- 1.18 It is based on a 'precautionary principle' so that where uncertainty or doubt remains, an adverse effect should be assumed. If an eligible plan or programme requires an appropriate assessment (the next stage after screening), then that plan or programme will also require an SEA.
- 1.19 'European Sites' are also known as 'Natura 2000' sites (SACs designated for particular habitat types and SPAs classified for rare and vulnerable birds); and Ramsar sites (Designated Wetlands of International Importance). Government Policy Paper on changes to the Habitats Regulations 2017 post-Brexit states that: Any references to Natura 2000 in the 2017 Regulations and in guidance now refers to the new 'national site network'. The requirement for HRA however does not apply to other nationally designated wildlife sites such as Sites of Special Scientific Interest (SSSIs) or National Nature Reserves (NNRs); therefore, for clarity, HRA work may use the term 'European sites' (SACs and SPAs, and Ramsar sites), rather than 'national site network' (HRA proposal, LUC).
- 1.20 The HRA submitted alongside the Local Plan to Examination can be found here: <https://www.cotswold.gov.uk/media/fcolqq3/5501-habitats-regulations-assessment-report-apr-2017.pdf>

Screening Process

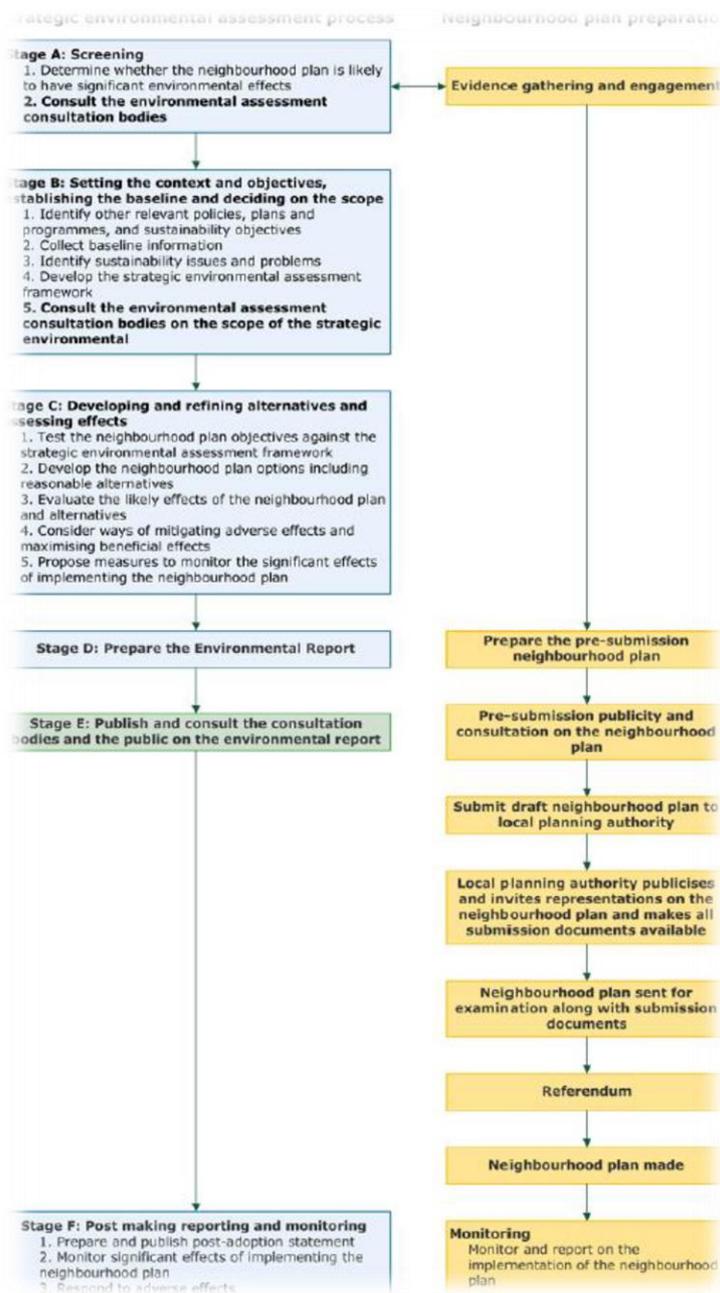
- 1.21 The legal requirement for SEA/HRA depends on the content of the neighbourhood plan. The Plan vision and objectives, or draft proposals, and a list of sites considered for inclusion in the plan (if any) and potential impact of new development will help determine whether or not the plan would likely give rise to significant effects.
- 1.22 'Assessment of the effects should be done in a proportionate way...' (Understand if your NDP requires SEA, [Locality](#), page 10), and although there may be some gaps in information, there should be enough to assess the likely significant effects of the plan.
- 1.23 The Inspector needs to be satisfied that the SEA/HRA work properly demonstrates the making of the Plan would not have any significant effects and therefore satisfies the basic condition on compatibility with Regulations.
- 1.24 The potential types of environmental effects which may arise as a result of the NDP and if they are likely to be significant, are;

Annex I (f) of the SEA Directive – environmental receptors (physical and cultural attributes of an area) which could be affected by proposals in the plan. Grouped into themes:

(f) the likely significant effects (1) on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.

SEA Screening

- 1.25 Screening is 'Stage A' of the strategic environmental assessment (SEA) process outlined in the Governments' National Planning Practice Guidance (NPPG), and should be undertaken as early as possible in the neighbourhood plan process.



1.26 The text below is taken from the Government’s Planning Practice Guidance (NPPG)² on when an SEA may be required:

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

² <https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal#baseline-environmental-characteristics>

- 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

Paragraph: 046 Reference ID: 11-046-20150209

Will the neighbourhood plan allocate sites for development?

1.27 The draft version of the plan does not allocate sites, although it does seek to designate Local Green Spaces. Should the scope of the plan change this will need to be reassessed.

Is the neighbourhood plan likely to have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan?

1.28 While the Neighbourhood Plan is likely to focus on more local detail than the Local Plan, The Planning Inspector stated in his report that he was ‘...satisfied that the sustainability appraisal that has been carried out throughout the process of preparing the Plan, as required by section 19(5) of the Act, has complied with the requirements of the European Directive on strategic environmental assessment and relevant national policy and guidance’³ (Para.24, Cotswold District Local Plan 2011-2031: [Inspector’s Report June 2018](#)).

Does the neighbourhood area contain sensitive natural or heritage assets that may be affected by the proposals in the plan?

1.29 The more environmentally sensitive a location, the more likely it is that potential environmental effects from a plan will be significant.

1.30 The NPPG provides guidance on this topic through providing a list of sites and area which should be deemed as ‘sensitive areas’ for the purposes of environmental assessment (i.e. screening projects for Environmental Impact Assessment (EIA)):

- European (Natura 2000) Sites⁴ (see also HRA)
- Sites of special scientific interest (SSSIs)
- National parks
- Areas of Outstanding Natural Beauty (AONB)
- World Heritage Sites
- Scheduled Monuments

³ <https://www.cotswold.gov.uk/media/1605407/Cotswold-Local-Plan-Report-Final.pdf>

⁴ Natura 2000 is a network of nature protection areas in the territory of the European Union. It is made up of Special Areas of Conservation and Special Protection Areas designated respectively under the Habitats Directive and Birds Directive. The NPPF, refers to these as habitats sites (Screening Neighbourhood Plans for SEA, Locality). And post-Brexit these are included within the UK ‘national site network’.

- 1.31 Where the Neighbourhood Plan falls within the scope of the SEA Regulations (table 2 below), a determination under Regulation 9 is then required. Regulation 9 requires that the responsible authority shall determine whether or not a plan is likely to have significant effects and
- a) take into account the criteria specified in Schedule 1 (Annex II) to the SEA Regulations (table 3 below), and
 - b) consult the environmental consultation bodies (Historic England, Natural England, Environment Agency).
- 1.32 Where a Neighbourhood Plan is likely to have a significant effect on the environment an SEA (full environmental report) must be carried out; and where the plan is unlikely to do so, and does not require an SEA, there should be a 'statement of reasons' or opinion for the determination should be given.
- 1.33 The criteria to decide whether a neighbourhood plan, might have significant environmental effects ('a' above) is set out in Schedule 1 of the Regulations (Annex II of ODPM Guidance) below.

ANNEX II

Criteria for determining the likely significance of effects referred to in Article 3(5)

1. The characteristics of plans and programmes, having regard, in particular, to
 - 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).
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to
 - the probability, duration, frequency and reversibility of the effects,
 - the cumulative nature of the effects,
 - the transboundary 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.

- 1.34 An SEA would also be necessary if the plan requires appropriate assessment under Habitats Regulations Assessment (HRA).

HRA Screening

- 1.35 The overall purpose of a HRA is to conclude whether or not a proposal or policy or whole Plan would adversely affect the integrity of the site in question.
- 1.36 Screening is 'Stage 1' of the HRA process, followed, if necessary, by an Appropriate Assessment. Under the Habitats Regulation 106 an assessment of the 'likely significant effects' of the Plan is the first step to be required. Where a doubt remains an adverse impact should be assumed as HRA's are based on the precautionary principle.
- 1.37 The first step is to consider which European site or sites could be affected by the Plan. Then consider the policies within the NDP and screen, using assumptions from the Local Plan HRA, both

in relation to how likely significant effects may result from the NDP, and on a proximity basis, on how far such impacts may travel; looking at physical damage, pollution, recreational pressure, water quantity and quality for example. The SAC conservation objectives are outlined in [Appendix 2](#).

1.38 A screening outcome for both SEA and HRA is provided in the conclusion.

Assessment- Gathering data

1.39 Once data on the environmental constraints and assets in the area have been gathered, it is then possible to determine any likely significant effects of the NDP proposals (positive and /or negative) on the environment.

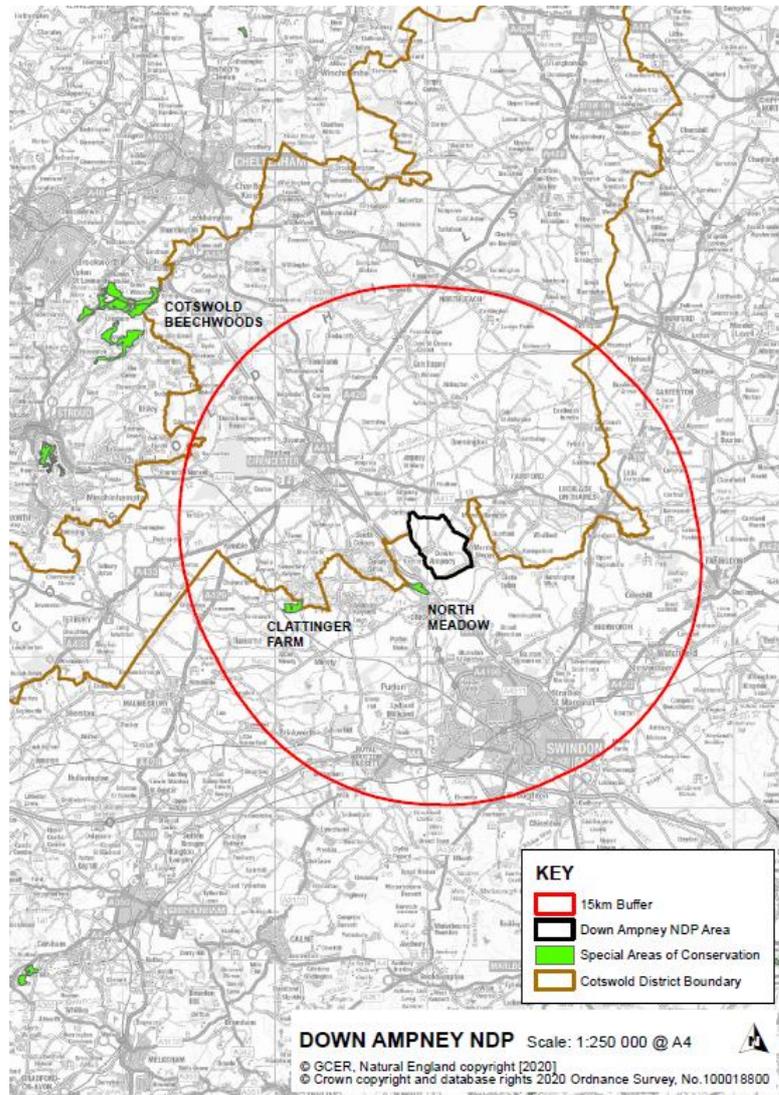
1.40 The final sections of the document then provide a screening assessment of the likely need for appropriate assessment and/or a full SEA.

HRA – Area of Search Map

1.41 The plan below shows those European sites within 15km of the neighbourhood plan boundary. The nearest sites to the NDP are;

- North Meadow and Clattinger Farm Special Area of Conservation (SAC).

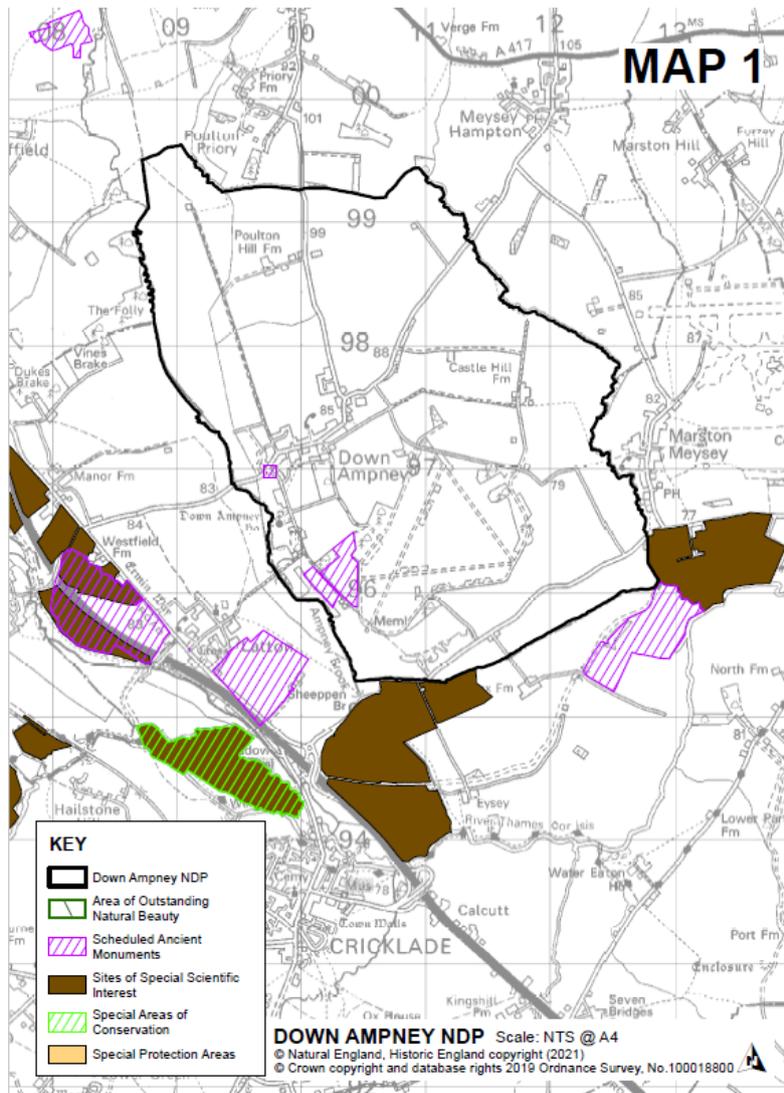
1.42 Notably, the nearest SAC lies to the south west at the edge of the District within the 15km area of search, North Meadow and Clattinger Farm SAC is some 1.1km away (with Rodborough Common SAC some 23.1km to the west)



Environmentally ‘Sensitive’ Areas Map

1.43 In the context of the most ‘sensitive areas,’ within and in the vicinity⁵ of the Neighbourhood Area, (see Map 1 below) the following sites also exist:

⁵ To determine whether the effects of the plan are likely to affect areas outside the plan area, i.e. define ‘within the vicinity’ an indicative threshold of 1km has been used as there are no allocations [Screening Neighbourhood Plans for SEA, Locality, p.12]. Designations beyond this area however are also considered.



- Sites of Special Scientific Interest (SSSI's)⁶:
 - Cotswold Water Park SSSI lies adjacent to the south east and southern boundary of the NDP in two areas. The SSSI condition is listed as 'unfavourable – declining'. The CWP SSSI has recently been enlarged by Natural England to cover all lakes and associated habitats⁷ although none are within the Parish boundary.
 - Cricklade SSSI lies further to the west, just beyond the southern CWP SSSI.
- Scheduled Monument designations ([National Heritage List for England](#)), there are two within the NDP⁸;
 - Settlement at Bean Hay Copse
 - Village Cross

⁶ <https://www.gov.uk/government/news/cotswold-water-park-given-greater-protection-by-natural-england>; <https://consult.defra.gov.uk/natural-england/cotswold-water-park/>. In January 2021 Natural England sent notification to expand the Site of Special Scientific Interest (SSSI) status in the CWP to cover all lakes, to help Nature Recovery⁶ (final confirmation of the new status is expected in the autumn).

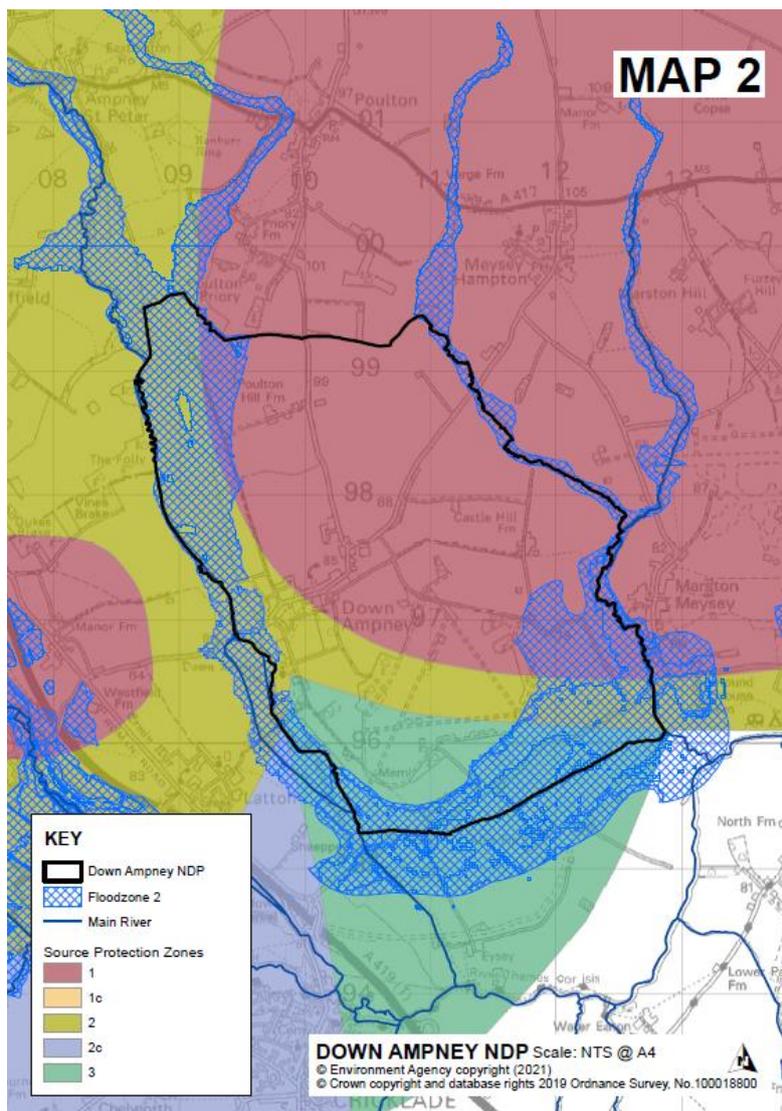
⁷ It encompasses the full extent of open water and associated habitats necessary for maintenance of the features of special interest. See Map <https://consult.defra.gov.uk/natural-england/cotswold-water-park/results/cwpssisummary1.pdf> Oct 2021

⁸ (NB/ the draft NDP also mentions other historic sites, page 13)

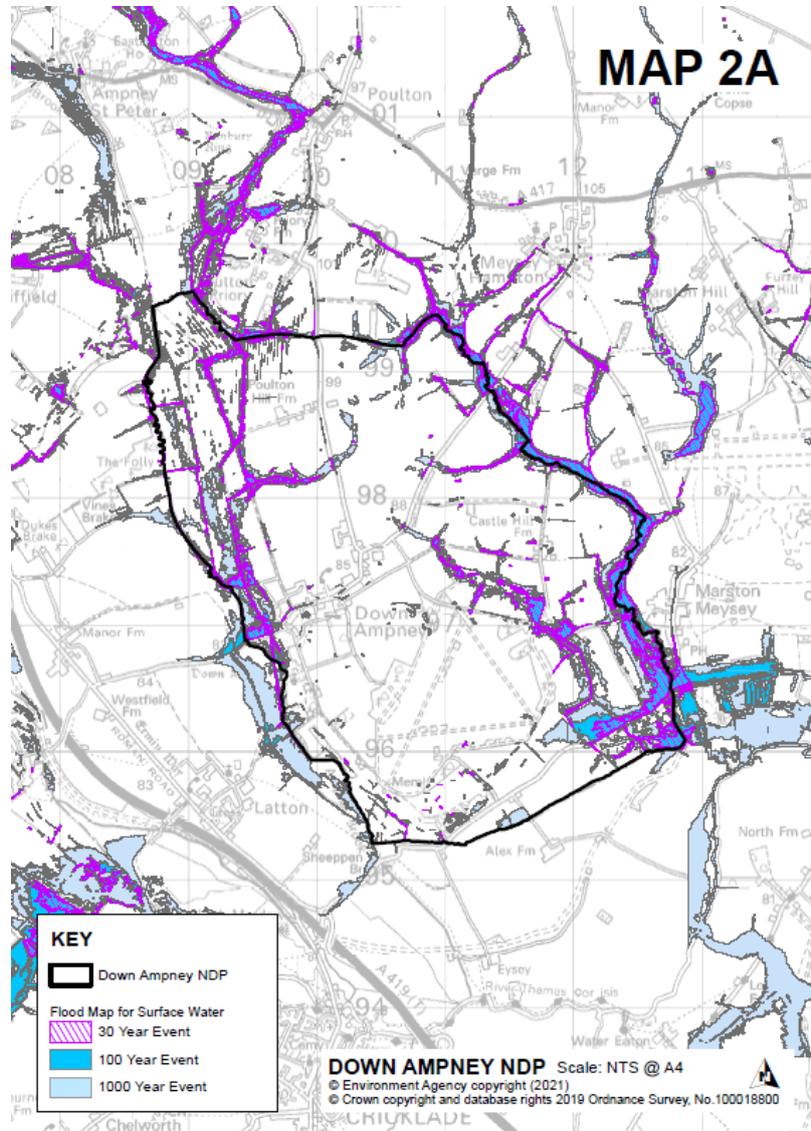
- Several other Scheduled monuments lie within the vicinity (approx. 1km) beyond the boundary – incl. Settlement NE of Eisey Field Copse to 0.3km south, and to west, Settlement SE of Latton, Settlement West of Latton and Village Cross

Further key environmental assets (see Locality guidance on Screening Neighbourhood Plans for SEA) located within, and in the vicinity of, (grouped into historic, landscape and water maps) the Neighbourhood area include;

Water Map



- Source Protection Zones⁹ – Reflecting the vulnerability of groundwater in the area to pollution, Inner Source Protection Zone 1, 1c and 3 cover the NDP area. The Local Plan points out development proposals in SPZ1 (a high vulnerability) would need specific design considerations. Development should take place in conjunction with Environment Agency advice in such a sensitive groundwater location to avoid contamination (Local Plan, SA, 2017).

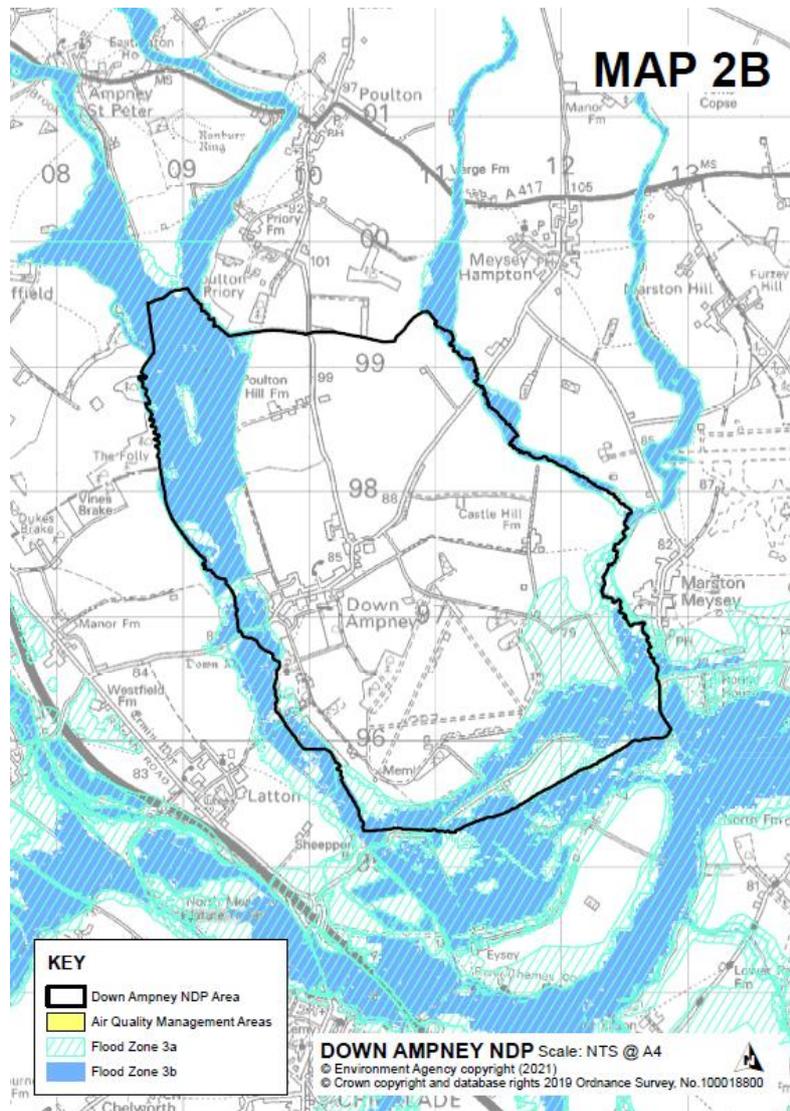


- The EA flood surface water¹⁰ flood map indicates a low risk of surface water flooding in Down Ampney (SFRA). However highway drainage is highlighted as a problem; in the 2007 flood review, in particular an old stone highway culvert which surcharges and caused road flooding in the past ([SFRA L2](#), Appendix, pg 30).

⁹ Groundwater source protection zones (SPZs) are defined by the Environment Agency to protect groundwater sources such as wells, boreholes and springs that are used for public drinking water. These are designated zones around public water supply

¹⁰ Surface water flooding is a problem throughout the District caused by intense rainfall that may only last a few hours, and usually occurs in lower lying areas often where the drainage system is unable to cope with the volume of water.

- The SFRA also suggests that most of the area is identified as having a medium risk of groundwater flood emergence¹¹, probably due to its proximity to the River Thames alluvial gravels. There is no historical record of groundwater flooding however.
- Thames Water records suggest there are also issues with sewer flooding¹² in the postcode sector (GL7 5) which includes Down Ampney. Thames Water identified nine areas where properties were flooded internally by sewers in the 2007 event (not including Down Ampney). However, it recognises that there were many other areas where sewers caused flooding to gardens and open spaces (SFRA Level 2, page 32).

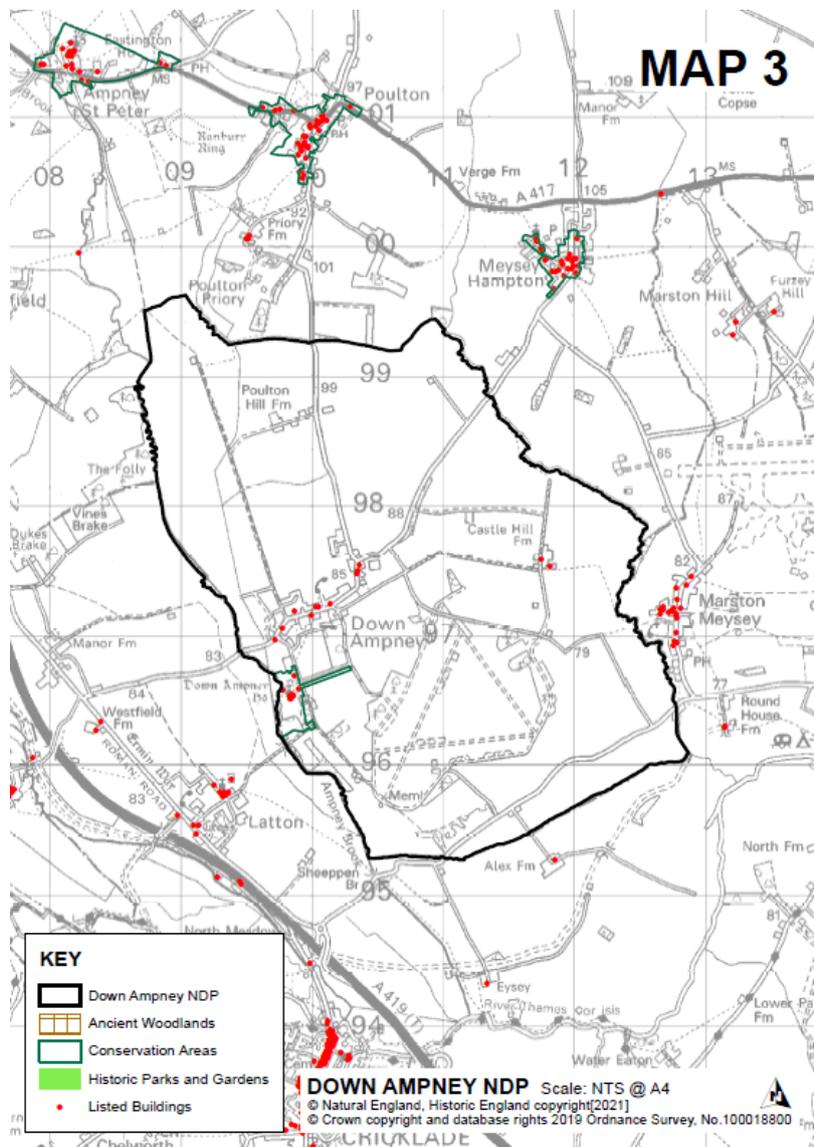


¹¹ In some areas where there is a high water table and water levels in watercourses are high for example, less groundwater is able to drain away, leading to water-logging and a risk of groundwater emergence.

¹² Sewer flooding occurs when intense rainfall overloads the sewer system capacity (surface water, foul or combined), and/or when sewers cannot discharge properly to watercourses due to high water levels

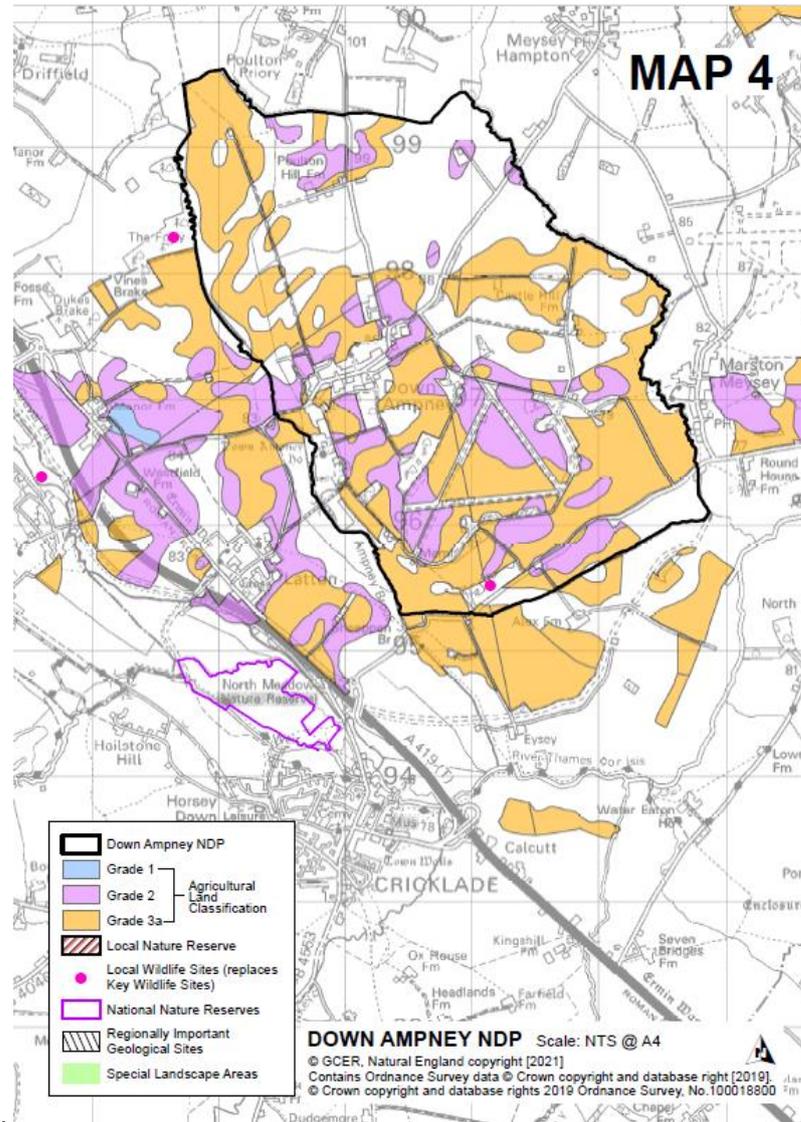
- Flood Zones – The River Thames has its source upstream and Ampney Brook, a main river, is a tributary of it; there are narrow fluvial flood zones in the NDP area including the highest risk flood zone 3b ‘fluvial floodplain’ and high risk flood zone 3a but which lie along the edges of the Parish.
- Historic flooding in 2007 at Down Ampney, may have been as a result of the Ampney Brook or the Poulton Brook (a tributary of the River Churn); rapid surface water runoff and failure of the sewage pumping station ([SFRA L2 appendix 2](#), May 2016).

Historic Areas Map;



- Down Ampney Conservation Area lies just beyond village to the south
- Listed Buildings, including the Grade 1 [Church of All Saints](#) and [Down Ampney House](#) (see National Heritage List for England (NHLE), September 2021)
- Archaeological potential – as well as the Scheduled Monuments ([Map 1](#)), the [Heritage Gateway](#) website also shows several points from NMR excavation index to south and east

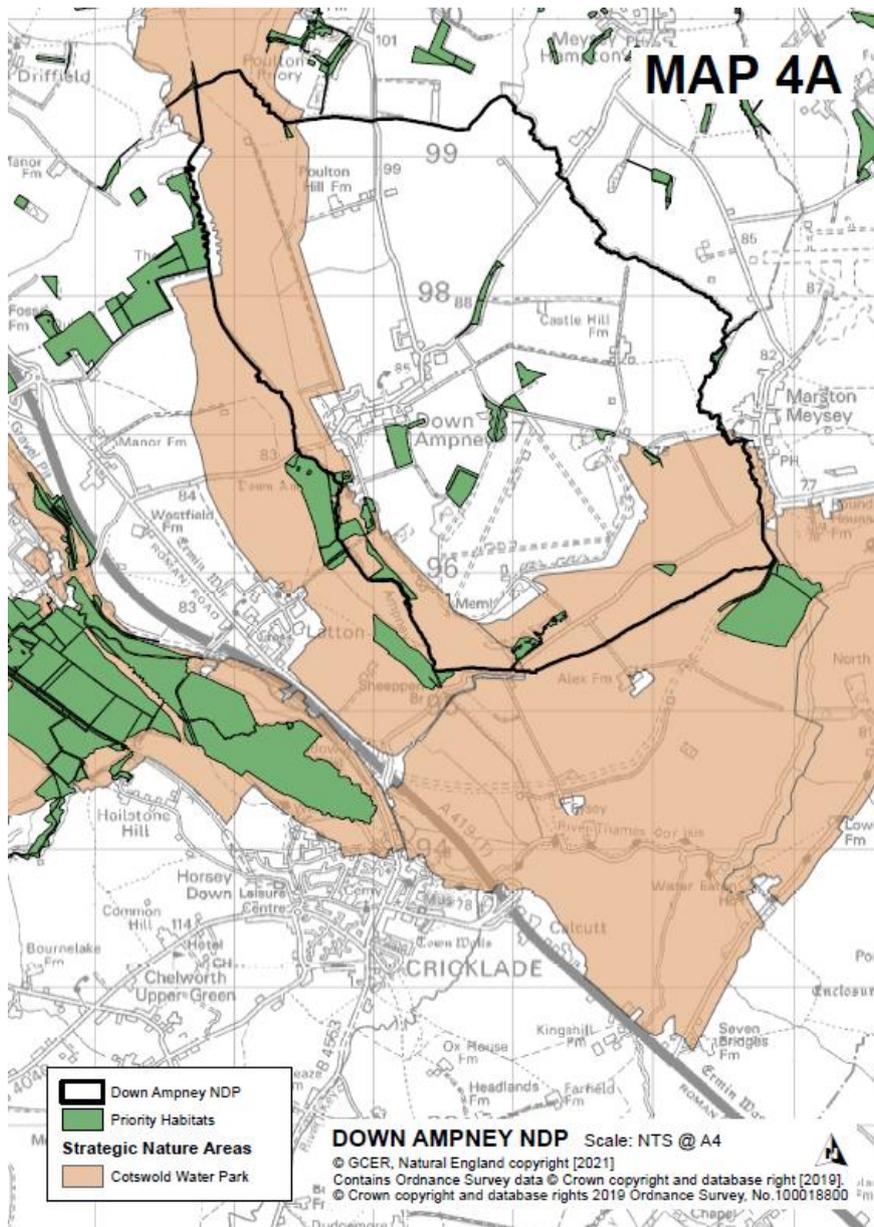
Landscape Map



- Agricultural Land classification¹³ is mostly Grade 3a, and some Grade 2 of the 'best and most versatile' land.
- North Meadow National Nature Reserve lies beyond the plan area to the south east, but close to the District and Parish boundary
- The Plan area also contains a Local (or Key) Wildlife Site¹⁴

¹³ Agricultural land is classified in five categories according to versatility and suitability for growing crops. The top three grades, Grade 1, 2 and 3a, are referred to as 'Best and Most Versatile' land.

¹⁴ Key Wildlife Sites (KWS) are areas with a rich diversity of habitats that provide refuges and corridors for wildlife across Gloucestershire. A KWS site has no legal protection and designation does not include public access and boundaries are open to review. They are also known as Local (Wildlife) Sites or LWS. <https://www.wildlifetrusts.org/local-wildlife-sites> Together with Local Geological Sites (called RIGS) they now comprise Local Sites as defined by Defra.



- Priority habitat; ¹⁵ areas of deciduous woodland
- A strategic nature area (SNA¹⁶) lies across the centre and south of the Parish area.

¹⁵ UK BAP priority species and habitats were those that were identified as being the most threatened and requiring conservation action under the UK Biodiversity Action Plan (UK BAP). Despite new requirements the UK BAP lists of priority species and habitats remain as important and valuable reference sources, combined into a Priority Habitats Inventory by NE.

¹⁶ Strategic Nature Areas (SNAs) are landscape scale areas of land that have been selected by Biodiversity South West as being important areas for conservation and expansion, they are not designated.

Assessment – HRA

- 1.44 This section provides a HRA screening for the Down Ampney NDP as to whether further Appropriate Assessment is required.

Cotswold Local Plan HRA

- 1.45 The Cotswold District Local Plan was subject to HRA which looked at designated sites which could be impacted by development within Cotswold District. An Appropriate Assessment concluded that adverse effects on any European Sites were ruled out in relation to; physical loss, damage to habitat, air pollution, increased recreation pressure, and no likely significant in-combination effects with other authorities' development plans.
- 1.46 It should be noted, 'With respect to Cotswold District the potential for significant effects on European Sites beyond the 15km distance is considered unlikely...' (para. 3.4, page 10, HRA Jan 2017).
- 1.47 Potential development within the Neighbourhood Plan area, could have a potential impact on 'transient species' i.e. those which travel beyond the SAC area to roost or forage. However the Local Plan HRA further states, 'In all cases the [SAC] sites are not close enough to the District boundary for effects relating to offsite habitat loss to be a concern...' (Local Plan HRA, Jan 2016 para 3.16).
- 1.48 The closest European site to Down Ampney is the North Meadow and Clattinger Farm SAC, 'a fragmented site located immediately adjacent to the southern boundary of Cotswold District' (CDC HRA Report, page 43. Jan 2017), located approximately 1.1km south west of the Neighbourhood Area at the nearest point ([HRA – Area of Search Map](#)). The SAC represents lowland hay meadows and contains rare species characteristic of lowland meadows¹⁷. It covers some 105ha in area. The relevant SAC conservation objectives are summarised in [Appendix 2](#).

Are there likely significant effects?

- 1.49 The draft Neighbourhood Plan was screened to identify if the Plan would cause activities that could have a potential impact (how likely) the NDP would have significant effects, and how far (proximity) they would travel, on North Meadow and Clattinger Farm SAC. Local Plan screening assumptions for this SAC had 'screened in' certain effects for further consideration in AA; air pollution, impacts of recreation and physical damage (on site).

Impact – physical damage /loss of habitat

- 1.50 The scale of potential development within the NDP is considered limited and it does not propose more allocated growth than the Local Plan. There are no proposed allocations within the early NDP draft, and the SAC would not be expected to experience direct physical damage on or loss of habitat from development.
- 1.51 Local Plan HRA states for those SAC as 'In all cases the [SAC] sites are not close enough to the District boundary for effects relating to offsite habitat loss to be a concern...' (Local Plan HRA, Jan 2016 para 3.16)

Impact - Changes in levels pollution

¹⁷ North Meadow and Clattinger Farm in the Thames Valley in southern England is one of two sites representing **lowland hay meadows** near the centre of its UK range. As in the case of the Oxford Meadows, this site represents an exceptional survival of the traditional pattern of management and so exhibits a high degree of conservation of structure and function. This site also contains a very high proportion (>90%) of the surviving UK population of fritillary *Fritillaria meleagris*, a species highly characteristic of damp lowland meadows in Europe and now rare throughout its range (taken from JNCC)

- 1.52 Development is not anticipated within the Neighbourhood Plan area, which may result in a significant increase in emissions from vehicular traffic and impact on air quality. While some development is possible within the Neighbourhood Plan there are no direct housing or employment allocations. The NDP supports the protection and enhancement of the countryside, recommends more sustainable travel, and protection and designation of Local Green Spaces.
- 1.53 North Meadow and Clattinger Farm SAC lies within 200m of the A419(T) (which is part of the strategic road network), and one of the main routes Cotswold residents use to commute outside of the District; and therefore increased traffic is likely to occur on the road from new housing developments more widely in and around the District. Appropriate Assessment of the LP concluded that the Local Plan would not have adverse effects, ‘...[given the] insignificant effect of air pollution despite high volumes of traffic, the relatively small proportion of the SAC within 200m of the road, and prevailing wind direction...’ (Local Plan HRA, Jan 2016 para 5.47).
- 1.54 Noise and vibration from construction of new housing or employment and artificial lighting (such as street lamps, security lighting) on species such as birds and bats, would need to be within 500m of a site to have an adverse effect (HRA, 3.18, 2017). The Local Plan HRA notes those SACs that do lie within 500m of District boundary are, ‘habitats not vulnerable to noise, vibration or air pollution’ (para 3.19). The nearest SAC is around 1100m to the south west of Down Ampney.

Impact - Recreational pressures

- 1.55 There is considered a minimal increase in local population and potential visitor numbers as there are no new proposed housing or employment allocations, although there is support for recreation/leisure within the NDP, including improving access to the countryside, cycleways and footpaths.
- 1.56 The SAC lies within the 15km area of search /distance from the NDP located adjacent the District Boundary (also a managed National Nature Reserve). The limited scale of development however compared to that allocated and assessed in the Local Plan (and existing AA), is not considered to cause significant disturbance and erosion to the site.
- 1.57 ‘...’, the AA concluded that the Local Plan would not have adverse effects on the integrity of European Sites in relation to increased recreation pressure ‘(para.5.55)

Impact - Water quantity and quality

- 1.58 There are no new allocations for housing that additionally suggest there would be a high increase in water demand from development or to impact on groundwater water quality as a result of potential development, and increased impermeable surfaces for example which could impact significantly upon the SAC. The Local Plan HRA concluded (based on Water Cycle Study) that no issues indicated that planned scale, location and timing of development within the District was unachievable from supplying water or preventing deterioration of water quality (HRA para.3.32)¹⁸. It is considered such effects have already been dealt with through the Local Plan appraisal.
- 1.59 Based on the HRA screening matrix for the Cotswold District Local Plan, the table below summarises whether the NDP is likely to have any significant effect on European sites:

¹⁸ ‘Likely significant effects were ‘screened out’ in relation to water quality and quantity. See also [Water Cycle Study](#) (JBA, 2015)

| Neighbourhood Plan | Likely activities (operations) to result as a consequence of the proposal | Likely effects if proposal implemented <i>e.g. increased air pollution, trampling and general disturbance physical loss or damage to habitat¹⁹</i> | European site potentially affected | Possible effects in combination with other plans | Could the proposal have likely significant effects |
|--------------------|---|---|--------------------------------------|--|---|
| Down Ampney | No housing or employment allocations | Minimal Likely to be some positive effects from policies which support GI, sustainable transport and protect Local Green Spaces. Minor negative impact e.g. from limited increase in population on recreation pressure or water demand | North Meadow and Clattinger Farm SAC | The NDP does not propose development. Therefore unlikely any effects with other Plans may combine with the NDP to have adverse effect. The SAC lies outside the Parish and District boundary, therefore development planned elsewhere is an important consideration. No such effects were identified by the Appropriate Assessment for the District Local Plan. | Unlikely. The NDP does not propose specific development which could significantly add to the impact on the SAC The general scale of potential development facilitated within the NDP area is therefore limited and proposed within the Local Plan; which has already been considered within the Appropriate Assessment. |

Table 1

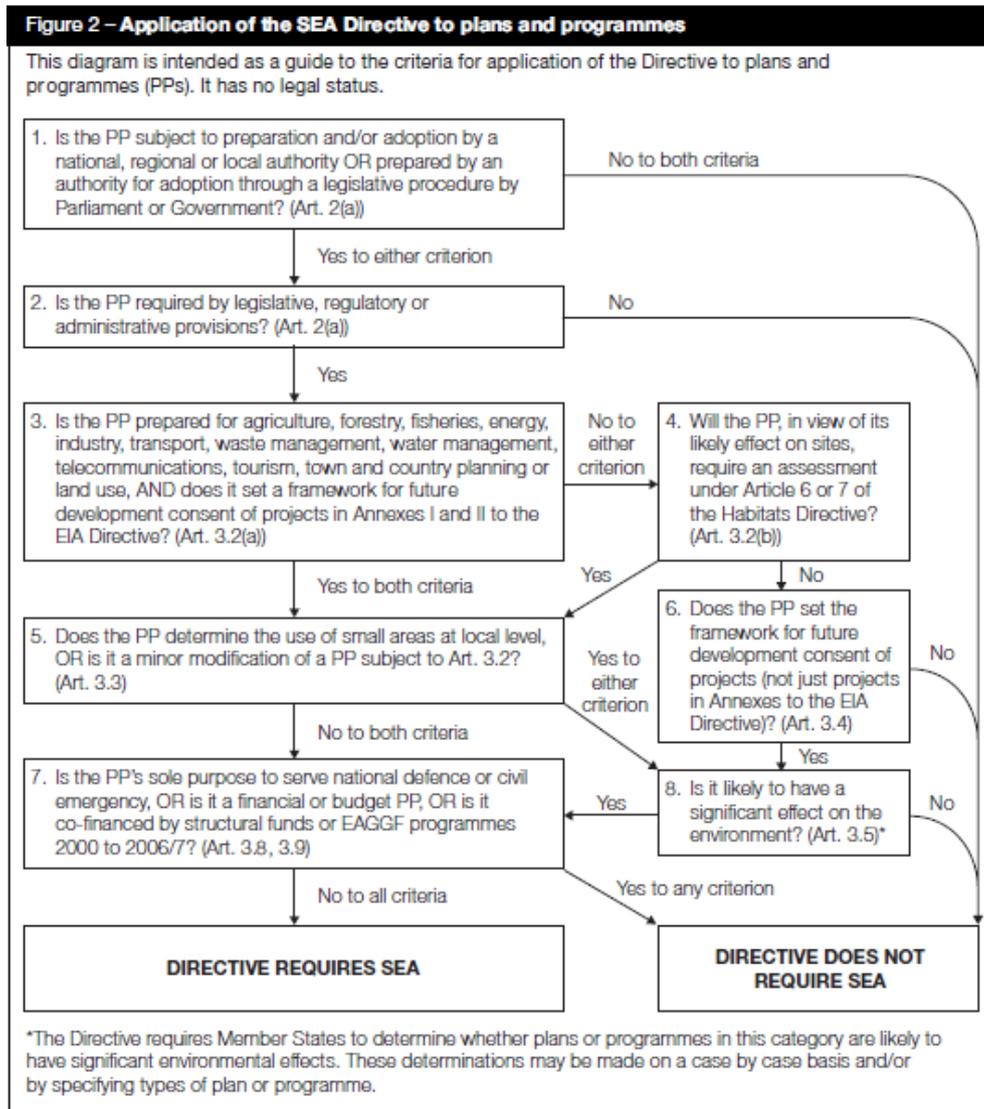
1.60 It is not considered that any further stages of HRA (Appropriate Assessment) are required for the NDP.

¹⁹ Types of effects as based on Local Plan HRA, Table 3.2.

Assessment – SEA

Is an SEA required?

1.61 The process for screening a planning document in order to ascertain whether a SEA is required is illustrated below (ODPM 2004 Guidance):



1.62 The table below is drawn from the 'decision making' flow diagram, and based on the information gathered above²⁰. It helps establish the need for a SEA.

²⁰ RTPi SEA/SA Guidance, January 2018

| Stage | Y/N | Reason |
|--|-----|--|
| 1 Is the PP 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 | <p>The Neighbourhood Development Plan will be 'made' by Cotswold District Council as the Local Authority. The Neighbourhood Plan is prepared by the relevant Qualifying Body - Down Ampney Parish Council.</p> <p>The NDP is adopted through a legislative procedure and supports the implementation of the Local Plan.</p> |
| 2 Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a)) | N | <p>The Neighbourhood Plan is an optional plan and not a requirement.</p> <p>The requirement for a NDP to have an SEA depends on its content and therefore it is necessary to screen the likely significant environmental effects of the NDP in line with the SEA Regulations.</p> |
| 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, 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)) | Y/N | <p>The Neighbourhood Plan is prepared for town and country planning purposes, but it does not set a framework for future development consent of projects in Annexes I and II to the EIA Directive (Art 3.2 (a))²¹. http://ec.europa.eu/environment/eia/eia-legalcontext.htm</p> |
| 4 Will the PP, in view of its likely effect on sites, require an assessment under Article 6 or 7 of the Habitats Directive? (Art. 3.2(b)) | N | <p>A District wide HRA Report for Cotswold District was prepared for the Local Plan process. The HRA Screening conclusions for the Local Plan were that a number of policies may result in significant effects on European Sites. These were considered further in Appropriate Assessment in 2017. This concluded that adverse effects on the integrity of any of the sites could be ruled out in relation to physical loss, damage to habitat, air pollution,</p> |

²¹ Annex I (railways, roads waste disposal installations, waste water treatment plants), but also Annex II other types such as urban development projects, flood-relief works, changes of Annex I and II existing projects...

| Stage | Y/N | Reason |
|--|----------|--|
| | | <p>increased recreation pressure, or in-combination effects with other development plans.</p> <p>Of the 8 Natura Sites looked at in the HRA Report, North Meadow and Clattinger Farm SAC (one of two areas) are the closest to Down Ampney Neighbourhood area, lying adjacent to Cotswold District, to the south west of the Parish approximately 1.1km beyond the boundary at its closest point .</p> <p>In light of a recent ECJ²² ruling proximity or presence to a European site may trigger SEA if there is a potential impact, where mitigation measures <i>cannot</i> be used to conclude there is ‘no significant effect’. As the NDP does not in any case allocate sites for development and no mitigation policies are included in the Plan proximity (within 15km buffer²³) of the SAC it is unlikely to have a significant effect and require Appropriate Assessment.</p> <p>It is considered that the NDP will not affect the specified SAC site over and above the impacts identified in the HRA Report carried out for the Local Plan. Therefore a full Appropriate Assessment is not considered to be required for the NDP.</p> <p>The HRA submitted alongside the Local Plan to Examination can be found here: https://www.cotswold.gov.uk/media/1500069/Updated-HRA-Report-for-Local-Plan-Focussed-Changes.pdf</p> |
| <p>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)</p> | <p>Y</p> | <p>The Neighbourhood Plan will apply to a wider area than a small area (like a building plan) but it is at local level ²⁴ – ‘only requires SEA if it is likely to have significant effects’ (article 3 (3)).</p> <p>It is not a minor modification to an existing plan.</p> |

²² The People Over Wind and Sweetman vs. Coillte Teoranta

²³ Para 3.4, HRA Report, January 2017

²⁴ The European Commission guidance (paragraphs 3.33–3.35) suggests that plans or

programmes 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, determining, for example, their height, width or design.... The complete phrase... makes it clear that the whole of a local authority area could not be excluded (unless it were itself small)”. The key criterion is not the size of area covered but whether the plan or programme would be likely to have significant environmental effects.

| Stage | Y/N | Reason |
|--|-----|--|
| <p>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)</p> | Y | <p>An NDP is (a framework) to be used in determining future planning applications, and once 'made' will form part of the statutory development plan.</p> <p>The Local Plan allocations plan set a wider framework for the District including this area.</p> <p>Down Ampney NDP does not make allocations and so does not in this specific sense set a 'framework for future development consent' or beyond those projects listed in the EIA Directive, but it does set a framework more generally.</p> |
| <p>7 Is the PP's sole purpose to serve 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)</p> | N | <p>The (sole) purpose of the NDP is not for any of those categories listed in Art 3.8,3.9.</p> |
| <p>8²⁵ Is it likely to have a significant effect on the environment? *</p> <p><i>(*See table 3 below)</i></p> | N | <p>The draft plan has policies with design, (including a Down Ampney Design Guide) and 'appropriate' development in mind for Down Ampney which has already been identified for growth in the Local Plan, and seeks to incorporate Green Infrastructure, SUDs and designate Local Green Space, for example. The NDP provides local guidance on how applications for development in the plan area should be determined.</p> <p>More locally there are listed buildings, a Conservation Area and an identified Local Wildlife Site, a strategic nature area (SNA) and Priority Habitats.</p> <p>Down Ampney NDP does not make any housing or employment allocations and as such there is no major level of proposed development in the Plan to impact upon environmentally sensitive areas (over that already considered in the Local Plan).</p> <p>It is considered there would be little or no impact on nationally recognised designation including two Scheduled Monuments, nearby SSSIs, or to the risk of</p> |

²⁵ Annex II of the SEA Directive– Criteria for determining the likely significance of effects on the environment. See Table 3.

| Stage | Y/N | Reason |
|-------|-----|--|
| | | <p>flooding within the Parish. The Neighbourhood Area does not have any Areas of Outstanding Natural Beauty (AONB) although a European Site (SAC) and National Nature Reserve also lies approx.1km beyond the District boundary. Policies in the draft NDP however do not fundamentally change the use of the land.</p> <p>The impact of any potential development (in general conformity with the Local Plan) with no direct allocations is therefore expected to be localised and minimal and therefore unlikely to be <i>significant</i> in the context of Down Ampney NDP.</p> |

Table 2

1.63 Given the ‘Yes’ responses above, it is considered that the Neighbourhood Plan is within the scope of the SEA Regulations and a screening opinion is required.

Are there likely significant Effects?

1.64 The screening requirements set out in Regulation 9 and Schedule 1 of the SEA Regulations include two sets of characteristics for determining the likely significance of effects on the environment:

- The characteristics of the Plan itself and
- The characteristics of the effects and of the area likely to be affected by the plan

These criteria are set out in table 3 below;

| Is it likely to have a significant effect on the environment | Criteria for determining the likely significance of effects (Schedule 1 of Regulations, Annex II SEA Directive) | Summary Significant Effects |
|---|--|---|
| 1.The characteristics of the Plan, having regard in particular to: | | |
| No | The degree to which the plan or programme sets a framework for projects or other activities, either with regard to the location , nature, size and operating | The Down Ampney Neighbourhood Plan will set out the framework to be used to determine proposals for development within the neighbourhood. It supports for example development appropriate to a rural area, and mix of housing, seeks to promote SUDs and developers to demonstrate adequate drainage, protect key vistas and local green spaces. It does not allocate land for development or |

| Is it likely to have a significant effect on the environment | Criteria for determining the likely significance of effects (Schedule 1 of Regulations, Annex II SEA Directive) | Summary Significant Effects |
|--|---|--|
| | conditions or by allocating resources | propose development in excess of that identified within the Cotswold District Local Plan. |
| No | The degree to which the plan or programme influences other plans or programmes including those in a hierarchy | <p>The Down Ampney Neighbourhood Plan can only provide polices for the area it covers while the policies at the District and National level provide a strategic context for the NDP to be in general conformity with. Down Ampney is identified as a Principal Settlement in, and will help deliver the aims of, the Local Plan, and is identified to take growth.</p> <p>None of the policies in the likely to have a direct impact on other plans in neighbouring areas.</p> |
| No | The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development | <p>A Neighbourhood Plan is required to contribute to the achievement of sustainable development. It is not specifically a plan for integrating environmental considerations. Any development must also be in accordance with the NPPF and Local Plan.</p> <p>The objectives in the NDP look to balance environmental, social and economic considerations; such as policy to designate Local Green Space, reduce flood risk, affordable housing for local people /key workers, objectives to consider local business opportunities on brownfield land and promote cycle routes. In particular to the NDP is the importance of the environment, it contains polices to protect and enhance the environment; incorporate SUDs principles, consider extreme weather events (climate change), respect landscape (and key vistas) of the area. It is considered overall, as no development is allocated, any impact on the local environment and places valued by the local people is likely to be positive.</p> |
| No | Environmental problems relevant to the plan | The Down Ampney Neighbourhood Plan is not allocating land for housing or employment use, therefore any adverse impact on the environment arising from the NDP proposals (causing environmental problems) is considered to be minimal and unlikely to be significant. No change of use of the land in the NDP is proposed, other than to designate (and continue) land as Local Green Space having demonstrated particular community importance. There are no specific environmental |

| Is it likely to have a significant effect on the environment | Criteria for determining the likely significance of effects (Schedule 1 of Regulations, Annex II SEA Directive) | Summary Significant Effects |
|---|---|---|
| | | problems that have not been assessed and considered through the Local Plan and its accompanying SA. |
| No | The relevance of the plan or programme for the implementation of community legislation on the environment (e.g. plans linked to waste management or water protection) | The Down Ampney Neighbourhood Plan is to be developed in general conformity with the Local Plan, the Gloucestershire Minerals and Waste Plans, and national policy. Therefore the implementation of (EU) community legislation on water protection or waste is not relevant to the NDP. |
| 2. Characteristics of the effects and of the area likely to be affected, having regard in particular to: | | |
| No | The probability, duration, frequency and reversibility of effects | It is considered unlikely that proposals in the NDP will lead to irreversible, long or short term or frequent adverse effects on the environment, especially no allocation of land, and therefore changing the of use of the land, is proposed. The NDP seeks to minimise the negative effects of potential development and promote positive impacts to enhance and conserve. It is more likely to have positive local effects. |
| ? | The cumulative nature of the effects | It is considered unlikely that there will be any significant cumulative effects, the potential limited level of development is in conformity with the Local Plan. Any development however, will likely have some impact. See above. |
| No | The transboundary nature of the effects | Effects will be local with limited effects on neighbouring areas as the proposals within the NDP only apply to designated area. |
| No | The risks to human health or the environment | No risks have been identified |

| Is it likely to have a significant effect on the environment | Criteria for determining the likely significance of effects (Schedule 1 of Regulations, Annex II SEA Directive) | Summary Significant Effects |
|--|---|---|
| | (e.g. due to accidents) | |
| No | The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected) | <p>The Neighbourhood Area covers an area of about 11.3km² and the corresponding LSOA it is within contains a population of some 1,746. (Mid-2019 population estimate (projected from Census 2011 data)²⁶</p> <p>The facilitation of any small scale development supported in the NDP is considered to be minimal, and therefore unlikely to be significant in terms of the SEA Directive.</p> <p>It is unlikely that the effects of the draft policies (especially as there are no allocations) that no proposals will be large scale and extensive in terms of area or population size.</p> |
| | <p>The value and vulnerability of the area likely to be affected due to;</p> <ul style="list-style-type: none"> i) special natural characteristics or cultural heritage ii) exceeded environmental quality standards iii) intensive land-use | <p>The Down Ampney Neighbourhood Plan is unlikely to adversely affect the value and vulnerability of the area in relation to natural or cultural heritage. The Plan area is close to a SAC and National Nature Reserve, SSSI and contains a strategic nature area, local wildlife site and Priority Habitats. The Parish also contains a Conservation Area and two Scheduled Monuments, and Source Protection Zones (groundwater).</p> <p>There is unlikely to be intensive land use and therefore the NDP will not affect the value and vulnerability of the area.</p> <p>Any proposed development may have a potentially significant impact on the setting of a listed building or conservation area for example and therefore the effects are uncertain. Local Plan policies would however already apply in this case. The SA (2017) for the Local Plan states that three sites it assessed for Local Plan allocations in Down Ampney require Environment Agency advice as they are within a sensitive groundwater</p> |

²⁶ (LSOA code - E01022207: Cotswold 005B). Lower Super Output Area '207 or 'Ampneys and Hampton 2'. This larger area includes Down Ampney, as well as Poulton, Driffield and Mesey Hampton.

| Is it likely to have a significant effect on the environment | Criteria for determining the likely significance of effects (Schedule 1 of Regulations, Annex II SEA Directive) | Summary Significant Effects |
|--|--|---|
| | | <p>location (within SPZ1). One site was also identified as having significant historic environment constraints and to limit effects development should seek to enhance the setting of the nearby listed building. Draft NDP policies further seek to protect/enhance landscape views and local green spaces, as well as the rural character of the area, prevent flooding and consider the effects of climate change. Such policies are considered to have a positive effect on the area.</p> <p>The Neighbourhood Plan does not directly allocate sites for development, including within the potential constraints of the historic environment, or above and beyond that already assessed in the Local Plan SA.</p> <p>Overall there are unlikely to be significant environmental effects, due to the nature of the proposals in the NDP that should be investigated through SEA.</p> |
| | <p>The effects on areas or landscapes which have a recognised national community or international protections status</p> | <p>The Plan boundary is within 15km of the North Meadow and Clattinger Farm Special Area of Conservation (SAC).</p> <p>The Down Ampney Neighbourhood Plan however, is unlikely to lead to additional pressures on the European designated SAC or nearby nationally designated SSSI's as it does not allocate and change the use of land for development within or in close proximity of these designations, therefore significantly increasing population and its associated pressures.</p> <p>The level of development supported by the proposals in the NDP is minimal and therefore unlikely to be a significant effect.</p> |

Table 3

Conclusion

- 1.65 National Planning Guidance (NPPG) advises that a Neighbourhood Plan might require a SEA where a neighbourhood plan allocates sites for development²⁷; and or the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan; and likely to have significant environmental effects that have not already been considered and dealt with through a SA/HRA of the Local Plan.
- 1.66 Significant environmental effects have already been considered (e.g. historic environment and groundwater constraints) and dealt with through sustainability appraisal of the Local Plan for the District, to which the NDP must be in general conformity to meet its 'basic conditions'. In addition there are no allocations proposed within the NDP; and the impact of any potential development (in general conformity with the Local Plan) is expected to be localised and minimal and therefore not significant, overall it is not considered necessary to require a standalone Strategic Environmental Assessment for the NDP.
- 1.67 It is also considered that the NDP will not significantly affect the specified European site (North Meadow and Clattinger Farm SAC) over and above the impacts already identified in the HRA Report carried out for the Local Plan and therefore a Habitat Regulations 'Appropriate' Assessment is not considered to be required for the NDP.
- 1.68 The NDP does provide local guidance on how applications for development in the plan area should be determined. The draft plan has policies on design and appropriate development within Down Ampney, (which has been identified for growth in the Local Plan); and it seeks to designate and protect its Local Green Spaces, and enhance its landscape, prevent future flooding, provide appropriate affordable housing and housing mix for example.

Screening Opinion

- 1.69 The Screening Report was provided to the statutory consultation bodies for SEA (Historic England, the Environment Agency and Natural England) for their opinion, in line with the SEA and Habitats Regulations. The 5 week consultation period ended on the 25th November 2021, with no objections being raised (see their responses in [Appendix 3](#)).
- 1.70 Based on the Screening Report and responses from consultation it is **determined** that the Down Ampney Neighbourhood Plan is unlikely to have significant environmental effects and is therefore 'screened out' i.e. that no accompanying Appropriate Assessment (HRA) or Strategic Environmental Assessment report is required.
- 1.71 If the issues in the Neighbourhood Plan should change then a new screening may need to be undertaken. New development proposals in Down Ampney will be determined in line with the Local and Neighbourhood Plans, and may individually require screening for Environmental Impact Assessment (EIA) based on their type, scale and location.
- 1.72 Even if an SEA is not legally required preparation of an SA (not SEA) report could be useful because it documents how the neighbourhood plan contributes to sustainable development, which is one of the 'basic conditions,' a legal requirement, that the plan must meet to proceed to referendum ([Appendix 1](#))

²⁷ A neighbourhood plan can allocate additional sites to those in a Local Plan where this is supported by evidence to demonstrate need above that identified in the Local Plan (NPPG, para 043).

Appendix I

NPPG on Neighbourhood Planning

Paragraph: 065 Reference ID: 41-065-20140306

What are the basic conditions that a draft neighbourhood plan or Order must meet if it is to proceed to referendum?

Only a draft neighbourhood Plan or Order that meets each of a set of basic conditions can be put to a referendum and be made. The basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004. The basic conditions are:

- a. having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan). Read more details.
- b. having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order. This applies only to Orders. Read more details.
- c. having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order. This applies only to Orders. Read more details.
- d. the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development. Read more details.
- e. the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area). Read more details.
- f. the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations. Read more details.
- g. prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan). Read more details.

Appendix 2

Conservation Objectives can be used to inform any Habitats Regulations Assessments, and any measures necessary to conserve or restore the European Site and/or to prevent the deterioration or significant disturbance of its qualifying features (NE Advice).

The conservation objectives of North Meadow and Clattinger Farm SAC can be found in publications by Natural England.



European Site Conservation Objectives for North Meadow and Clattinger Farm Special Area of Conservation Site Code: UK0016372

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.

Qualifying Features:

H6510. Lowland hay meadows (*Alopecurus pratensis*, *Sanguisorba officinalis*)

Appendix 3

Environment Agency

18th November 2021

Thank you for consulting the Environment Agency on your SEA screening opinion for the Down Ampney neighbourhood plan.

We regret that at present, the Thames Area Sustainable Places team is unable to review this consultation. This is due to resourcing issues within the team, a high development management workload and an increasing volume of neighbourhood planning consultations. We have had to prioritise our limited resource, and must focus on influencing plans where the environmental risks and opportunities are highest. For the purposes of neighbourhood planning, we have assessed those authorities who have “up to date” local plans (plans adopted since 2012, or which have been confirmed as being compliant with the National Planning Policy Framework) as being of lower risk. At this time, therefore, we are unable to make any detailed input on neighbourhood plans being prepared within this local authority area.

However, together with Natural England, English Heritage and Forestry Commission, we have published joint guidance on neighbourhood planning, which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at:

http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf

Kind regards,

Sarah Green

Planning Advisor, Thames Sustainable Places Team

Environment Agency, Red Kite House, Wallingford, OX10 8BD

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Historic England

23rd November 2021



Thank you for your consultation on the SEA Screening for the emerging Down Ampney Neighbourhood Plan.

This is our first involvement in the preparation of this Plan so we also appreciate having sight of a current draft.

On this basis I can confirm that there are unlikely to be any issues associated with the Plan upon which we would wish to comment other than in a broad congratulatory manner.

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

Kind regards

David

David Stuart | Historic Places Adviser

Historic England | South West

1st Floor Fermentation North | Finzels Reach | Hawkins Lane | Bristol | BS1 6WQ

<https://historicengland.org.uk/southwest>

Natural England

27th November 2021



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

Dear Ms Corbett

Down Ampney Neighbourhood Plan – SEA and HRA Screening

Thank you for your consultation on the above dated and received by Natural England on 21 October 2021.

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.

Strategic Environmental Assessment Screening

Natural England considers that, based on the material supplied with the consultation, in so far as our strategic environmental interests are concerned, significant environmental effects resulting from the neighbourhood plan are unlikely. We therefore agree with the conclusion of the SEA screening report that a Strategic Environmental Assessment would not be required.

Further guidance on deciding whether the proposals are likely to have significant environmental effects and the requirements for consulting Natural England on SEA are set out in the National Planning Practice Guidance.

Habitats Regulations Assessment Screening

Natural England welcomes the consideration given to the Habitats Regulations. We agree with the conclusion of the report that the Neighbourhood Plan is not likely to cause a significant effect on any European site and therefore no further assessment work would be required.

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

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

Yours sincerely

Sally Wintle

Consultations Team

Additional general comments from Gloucestershire County Council:

Ecology

Thank you for consulting Gloucestershire County Council (GCC). There may be other GCC officer comments but this one is focused on any strategic ecological implications.

In relation to whether the Neighbourhood Plan needs to come accompanied with a Habitats Regulations Assessment (HRA) the following European Site is relevant and has been identified by the Screening Report:

North Meadow & Clattinger Farm SAC

I would agree that a likely significant effect on the Cotswold Beechwoods SAC or Rodborough Common SAC at further distance can be scoped out from consideration.

On page 10 Local (Wildlife/Geological) Sites might also have been listed but none fall within the parish area or are immediately adjacent to it.

Possible effects of the NDP might be the loss of landscape features used by commuting bats, disturbance of woodlands and European/International sites from increased visits by new residents or possibly an increase in nutrient levels via air or water or noise pollution. However importantly I note the Screening Report states that the Neighbourhood Plan does not seek to allocate land for development although it does seek to provide local guidance on the determination of planning applications within the parish. The plan also takes a sustainable approach. Taking the topic of biodiversity (ecology) alone the need for a Strategic Environmental Assessment (SEA) and/or Habitats Regulations Assessment (HRA) of the Neighbourhood Plan therefore appears unnecessary which accords with the Screening Report conclusion. Natural England and the Environment Agency should be able to give a definitive view on these matters if not already.

Kind regards

Gary Kennison

Principal Ecologist

Heritage Team

Strategic Infrastructure

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Gloucestershire County Council

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