

Hunsdon Neighbourhood Area Plan

SEA Screening Report

April 2021

Prepared by Govresources Ltd

for

Hunsdon Neighbourhood Area Plan Group

and Hunsdon Parish Council

1. SEA in Hunsdon Neighbourhood Area

- 1.1 This report sets out a draft Screening Determination for the Hunsdon Neighbourhood Area Plan (HANP) and has been prepared for the Hunsdon Neighbourhood Area Plan Group and Hunsdon Parish Council by Govresources Ltd.
- 1.2 The Neighbourhood Plan has been prepared for Hunsdon Parish Council (as the accountable body) for the Hunsdon Neighbourhood Area Plan Area (agreed by East Herts Council on 29th November 2019), which encompasses part of the Parish of Hunsdon (see Figure 1). It will guide the future evolution of the village and help inform planning decisions to 2033.

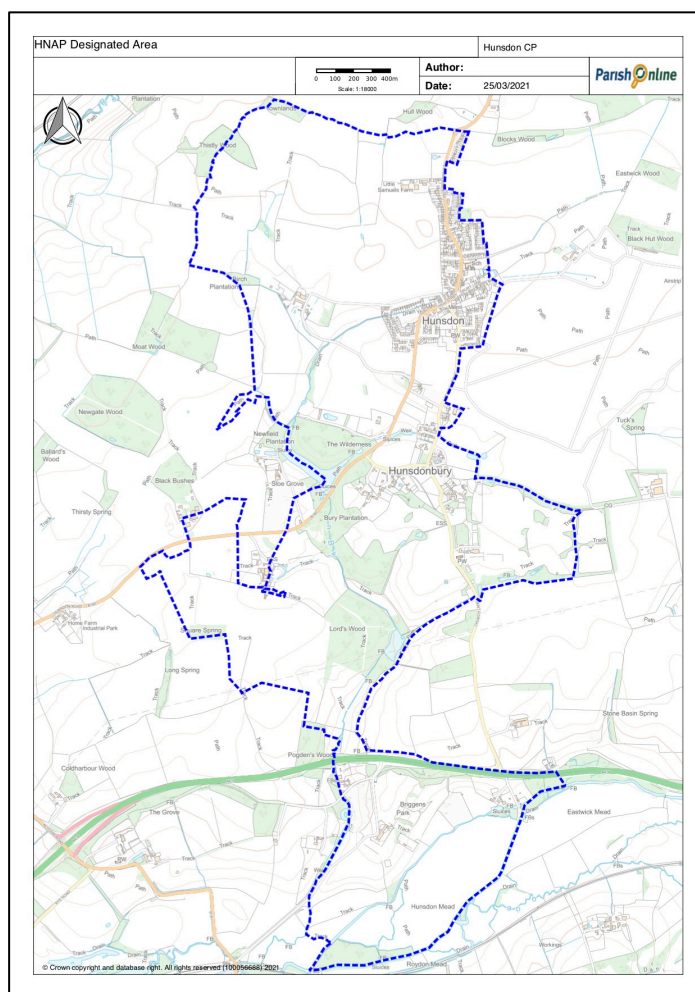


Figure 1 Hunsdon Neighbourhood Area Plan Designated Area

- 1.3 The purpose of the screening report is to determine whether the HANP is likely to have any significant environmental effects and so require a Strategic Environmental Assessment (SEA). More detail is given in the following sections on Legislative Background (section 2), Establishing a Need for an SEA (section 3), and Hunsdon Neighbourhood Area Plan (section 4).
- 1.4 National and Local Policy are reviewed in sections 5 and 6.

- 1.5 An assessment of the impact of the single site allocation is contained in section 7 and a Screening Assessment table can be found in section 8 followed by a draft Screening Determination in section 9.
- 1.6 The Pre-submission draft of the HANP can be viewed on the neighbourhood plan website: <https://hunsdonneighbourhoodplan.org.uk/>.
- 1.7 In addition, resources on wildlife sites and other local and national environmental designations have been gathered in the process of preparing the HANP, including a comprehensive set of maps and descriptions kindly provided by the Herts Environmental Records Centre.

2. Legislative Background

- 2.1 The European Union Directive 2001/42/EC requires an SEA to be carried out for certain types of plans and programmes that could have significant environmental effects. The Environmental Assessment of Plans and Programmes Regulations 2004 (the Regulations) transposed this Directive in law for England and Wales.
- 2.2 Neighbourhood plans fall within the scope of this legislation. They are a plan as defined by Article 3(2) of the SEA Directive and Regulation 5 paragraph 2 of the Environmental Assessment of Plans and Programmes Regulations 2004.
- 2.3 Under Article 3(2) of the SEA Directive and Regulation 5 paragraph 6 of the Regulations, Strategic Environmental Assessment (SEA) is only required for documents that determine land use in small areas at the local level where it is considered that they are likely to have significant environmental effects.
- 2.4 The Conservation of Habitats and Species Regulations 2010 (as amended in 2012) transpose the requirements of the European Habitats Directive 92/43/EEC into English law. The Habitats Directive and Conservation of Habitats and Species Regulations afford protection to plants, animals and habitats that are rare and vulnerable in a European context.
- 2.5 Habitats Regulations Assessment (HRA) is a systematic process through which the performance of a plan or project can be assessed for its likely impact on the integrity of Natura 2000 sites, consist of Special Protection Areas (SPA), Special Areas of Conservation (SAC); Potential Special Protection Areas and candidate Special Areas of Conservation (pSPA and cSAC); and listed or proposed Ramsar sites).
- 2.6 Under Regulation 9 of the Regulations (2004), the responsible body (local parish or town council or neighbourhood forum) is required to determine whether a plan or programme is likely to have significant environmental effects. This assessment is carried out through a screening determination, using a specified set of criteria (set out in Schedule 1 of the Regulations). In accordance with the Regulations, the results of the screening process are set out in this SEA Screening Determination report, which must be publicly available, submitted with the Neighbourhood Plan proposal and made available to the independent examiner.
- 2.7 Paragraph 177 of the National Planning Policy Framework (NPPF) 2019 states that "The presumption in favour of sustainable development does not apply

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

3. Establishing a Need for an SEA

- 3.1 Planning Practice Guidance states that "to decide whether a draft Neighbourhood Plan might have significant environmental effects, it must be assessed (screened) at an early stage of the plan's preparation according to the requirements set out in regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004"¹.
- 3.2 The guidance also suggests that "The local planning authority, as part of its duty to advise or assist, should consider putting in place processes to determine whether the proposed Neighbourhood Plan will require a strategic environmental assessment."² In this case East Herts District Council (EHDC) as the responsible authority will provide assistance by seeking the opinions of the three statutory consultation bodies in undertaking the screening determination.
- 3.3 The Guidance notes that as a general rule, an SEA is more likely to be necessary if:
 - a Neighbourhood Plan allocates sites for development
 - the Neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
 - the Neighbourhood Plan is likely to have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan".
- 3.4 The HANP has been assessed in accordance with the criteria outlined in Schedule 1 of the SEA Regulations taking account of the Planning Practice Guidance in reaching its conclusions.
- 3.5 The three statutory environmental bodies designated in the regulations (Historic England, the Environment Agency and Natural England) are to be consulted on the draft Neighbourhood Plan to determine whether an environmental assessment is required. This draft screening report has been produced to facilitate that consultation.

4. Hunsdon Neighbourhood Area Plan

- 4.1 The parish of Hunsdon lies within the District of East Herts. It is a typical rural parish traditionally having primarily agricultural economic activities with the

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

² ibid

bulk being arable farming. The parish enjoys a rich heritage. To the south it borders the River Stort, marking the Herts/Essex boundary and extends to the limits of Widford in the north. The western boundary broadly follows the watershed overlooking the Ash and Lea valleys and in the east the parish takes in much of the old RAF Hunsdon Base bordering Eastwick. However, part of the parish comprising the old airfield and Brickhouse Farm lies within the allocated Gilston Area and consequently are not within the designated boundary of this Plan

- 4.2 The Hunsdon village centre is a conservation area with the High Street lined with 16th and 17th century cottages. To the south, Hunsdon House was once a palace owned by Henry VIII used for hunting and surrounded by deer park and at times, the home of his children, Mary, Elizabeth and Edward-all future monarchs. The remains of four fishponds associated with the House at Lords Wood are a Scheduled Monument.
- 4.3 Statistics available from ACRE (Action with Communities for Rural England) relating to the Community profile for Hunsdon 2013 show the population of the parish is approaching 1100 in some 450 dwellings. There are very few residential properties in the parish not within the defined Neighbourhood Plan Area. The populated area is centred in the village together with a cluster around Hunsdonbury and the Church and ribbon development northwards on Widford Road (B180).
- 4.4 Both the natural and historic heritage of the parish have been carefully considered through the preparation of the Neighbourhood Plan and the policies have been written specifically to take these assets into account.
- 4.5 The Neighbourhood Plan allocates one site for housing development to deliver 12 homes (Policy HHD2). This site already has planning permission
- 4.6 The HANP Area does not contain or border any sensitive sites of European significance (Natura 2000) but does include part of Hunsdon Mead Site of Special Scientific Interest (SSSI). The housing site allocation is more than 2 kms from the nearest point of the SSSI.
- 4.7 There are two Scheduled Monument within the HANP Area, Hunsdon Brook Fishponds and Hunsdon World War II airfield defences. The Hunsdon Brook Fishponds comprises four Tudor fishponds each created and defined by earthwork dams crossing the valley of the Hunsdon Brook. They are situated on the eastern boundary of the HANP Area and wrap around the Lord's Wood Ancient Woodland. The Scheduled Monument is sited 1 km from the housing site allocation. The World War II airfield defences are scattered around the east of the Parish of Hunsdon but only one small part of these defences fall within the HANP Area, at the southern end of the village on the B180.
- 4.8 Hertfordshire County Council is providing advice on other monuments on their records that might be suitable to add to the list of Non-designated Heritage Assets.
- 4.9 The HANP Area contains 80 listed buildings including the Grade I listed Hunsdon House and Parish Church of St Dunstan. There are no proposals in the Neighbourhood Plan which would impact these heritage assets. Comments from

Historic England on the Pre-submission draft of the HANP have been very positive.

- 4.10 Briggens Park is a Grade II Registered Park and Garden originally designed by Charles Bridgeman in the 1720's although the extant pleasure gardens date principally from the Edwardian period. There are also two locally listed Parks and Gardens mentioned in the Historic Parks & Gardens SPD produced by East Herts Council in 2007 (reference https://cdn-eastherts.onwebcurl.com/s3fs-public/documents/Historic_Parks_and_Gardens_SPD.pdf), in the HANP Area, Hunsdon House and Hunsdonbury. Hertfordshire Gardens Trust are providing guidance on any amendments that should be made to the Pre-submission draft of the HANP to best protect those assets.
- 4.11 The two watercourses in the HANP Area are the Hunsdon Brook and the River Stort. The Environment Agency in have requested a strengthening of the policies regarding the rivers and their conservation value, and this will be addressed in the revised plan.
- 4.12 The Neighbourhood Plan's overall approach is to support appropriate development which protects the character of the built and natural environment of the parish and reflects its attractive rural character.
- 4.13 The vision of the Neighbourhood Plan is:

Through our Neighbourhood Plan we aim to safeguard Hunsdon as a welcoming and inclusive place to live, work, learn and play. Our aim is to preserve and protect the character and tranquillity of our rural environment and community assets, whilst ensuring that development is sustainable and that infrastructure, services, business and transport support and promote wellbeing for the benefit of our community.

Our Neighbourhood Plan will be a plan for our community made by our community.

- 4.14 The Neighbourhood Plan contains the following objectives:
- A. To protect, sustain and enhance all aspects of the rural environment, in order to conserve the character and appearance of the area, balancing the needs of business, residents and wildlife
 - B. To identify and protect built heritage, including locally listed buildings, and enhance their settings
 - C. To ensure that new development is accessible to and meets the needs of our community
 - D. To improve transport links (car, bus, rail, bike and walking), and reduce the effect of excessive heavy goods traffic, street parking, speeding and rat-runs in the light of the increasing demands from developments outside the area
 - E. To promote healthy lifestyles through maintenance and improvement of recreational and community facilities to enhance the health and wellbeing of residents

- F. To encourage employment opportunities within the parish across all ages, skills and market sectors in order to support residents and other village assets (shop, pubs)
- G. To protect and enhance features important to the visual appearance and rural character of the parish; cherished views; green open spaces; woodland; and natural habitats and watercourses

5. National Policy

- 5.1 The following paragraphs consider national environmental policy in relation to the HANP. Further specific comments in relation to the single small residential site allocation policy can be found in Section 7 below.

Historic Environment

- 5.2 Two paragraphs in the National Planning Policy Framework address the historic environment and heritage assets in local plans and proposals, namely paragraph 185 and paragraph 190. For the purposes of this SEA Screening Report, the Neighbourhood Plan is treated as a local plan.
- 5.3 Paragraph 185 advises that local planning authorities should set out in their local plan a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. In doing so, they should recognise that heritage assets are an irreplaceable resource and conserve them in a manner appropriate to their significance. In developing this strategy, local planning authorities should take into account:
- a) the desirability of sustaining and enhancing the significance of heritage assets and assets, and putting them to viable uses consistent with their conservation;
 - b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
 - c) the desirability of new development making a positive contribution to local character and distinctiveness; and
 - d) opportunities to draw on the contribution made by the historic environment to the character of a place.
- 5.4 Paragraph 190 states that "Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal."
- 5.5 Historic England provides guidance on the prediction and identification of significant effects and mitigation measures. In the context of the HANP Area these can be summarised as:
- Loss of or damage to a heritage asset or its setting
 - Conservation and enhancement of a heritage asset
 - Loss or erosion of the historic character of the village

- Impact on the 'at risk' status of assets or risk to the historic environment
- Cumulative, secondary or synergistic impacts on heritage assets or the village

The guidance goes on to say that mitigation measures may include historic environment policy guidance and detailed historic characterisation studies. The Conservation Area Appraisal for Hunsdon village is a little out of date, so heritage has featured significantly in the preparation of the Neighbourhood Plan, from consideration of impact on Scheduled Monuments to the identification of Non-designated Heritage Asset

Natural Environment

- 5.6 The NPPF also addresses the conservation and enhancement of the natural environment in plan making. Paragraph 170 of the NPPF refers to the enhancement of the natural and local environment and paragraph 174 refers to the protection and enhancement of biodiversity and geodiversity.
- 5.7 Paragraph 170 refers to providing net gains for biodiversity, including establishing coherent ecological networks that make an area more resilient to current and future pressures.
- 5.8 Of particular relevance to the Neighbourhood Plan, paragraph 174 says that plans should identify, map and safeguard wildlife-rich habitats and promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.
- 5.9 The Neighbourhood Plan has used the information provided by Herts and Middlesex Wildlife Trust (Herts Environmental Records Centre) to identify non-statutory habitats within the Neighbourhood Plan Area.

6. Local Policy

- 6.1 The East Herts District Plan was adopted on 23 October 2018. The policies relevant to the protection of heritage assets and the natural environment in the HNAP Area are listed as follows:

GBR1 Green Belt

VILL1 Group 1 Villages

HA1 Designated Heritage Assets

HA2 Non-Designated Heritage Assets

HA3 Archaeology

HA4 Conservation Areas

HA7 Listed Buildings

NE1 International, National and Locally Designated Nature Conservation Sites

NE2 Sites or Features of Nature Conservation Interest (Non-Designated)

NE3 Species and Habitats

NE4 Green Infrastructure

WAT3 Water Quality & the Water Environment

- 6.2 All of the above policies were taken into account throughout the preparation of the Neighbourhood Plan. This Neighbourhood Plan is in accordance with the

strategic policies in East Herts District Plan and this will be further tested at the Examination of the Plan.

- 6.3 The Sustainability Appraisal for the East Herts District Plan was published in 2016, by AECOM. At that time the preferred approach to growth in villages was similar to the final approach in the adopted District Plan; that 500 new homes would be provided in the larger villages (Group 1 Villages including Hunsdon) over the plan period, equating to a minimum growth factor of 10% based on the 2011 census. The sustainability of this approach in terms of the natural and historic environment and the water environment were fully considered in the Sustainability Appraisal.
- 6.4 In terms of the options considered in the Sustainability Appraisal, Option 1a including the strategy of 500 homes being located in Group 1 villages was shown to have no negative significant effects on the natural or historic environment. The only relevant potential significant environmental effects that were identified for the chosen development strategy were on landscape. Special regard was had to the impact on landscape of the housing options considered during the preparation of the Neighbourhood Plan.

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- 6.5 Natural and historic environment policies in the Neighbourhood Plan include:
- POLICY HE1 CONSERVATION AND ENHANCEMENT OF BIODIVERSITY
 - POLICY HE2 DESIGNATED LOCAL GREEN SPACES
 - POLICY HE3 PROTECTION OF CHERISHED VIEWS
 - POLICY HE4 VALUED HEDGEROWS
 - POLICY HE5 HUNSDON MEAD
 - POLICY HE6 RENEWABLE ENERGY
 - POLICY HHC1 HERITAGE AND CONSERVATION
 - POLICY HHC2 NON-DESIGNATED HERITAGE ASSETS

7. Site Allocation Assessment

- 7.1 The housing target set for Hunsdon in the East Herts District Plan is 37 new homes over the plan period. This target has already been reached with net total of 37 homes being permitted since 1 April 2017. One of the sites with planning permission is still under construction. In order to show that the target has been reached however, this site is subject of housing site allocation policy HHD2. The site is shown on the extract of the Policies Map in Appendix A.

8. Screening assessment

8.1 As mentioned above, the Regulations specify a set of criteria against which the likely environmental effects of any plan covered by the Regulations must be assessed to determine whether it requires a SEA. The table below considers each of these criteria in turn, showing that if there are any significant environmental effects of the Neighbourhood Plan, they will be positive effects.

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

| Criteria for determining the likely significance of effects | Likely to have significant effects? | Justification for assessment |
|--|--|--|
| 1 (a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources | No | <p>The Neighbourhood Plan will form part of the Statutory Development Plan and therefore would set a framework for future development projects in Hunsdon. However, the Neighbourhood Plan sits within a wider framework set out by the National Planning Policy Framework (NPPF), and East Herts District Plan. In addition, the projects for which the neighbourhood plan contributes to setting a planning framework are very local in nature.</p> <p>The HNAP does includes one site allocated for housing which has planning permission and is partially built (see Section 7 above).</p> |
| 1 (b) the degree to which the plan or programme influences other plans or programmes including those in a hierarchy. | No | <p>The Neighbourhood Plan will sit alongside the statutory development plan and provide a greater degree of detail to complement East Herts District Plan policies, as they relate to the HNAP Area. However, the Neighbourhood Plan will respond to and align with rather than influence other plans or programmes.</p> |

| Criteria for determining the likely significance of effects | Likely to have significant effects? | Justification for assessment |
|---|--|---|
| 1 (c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development | No | The Neighbourhood Plan will work to protect and enhance the character, natural environment and landscape of the HNAP Area, including statutory environmental designations and Local Green Space designations. A number of policies in the Neighbourhood Plan will contribute to the social sustainability of Hunsdon and provide socially sustainable development as defined in the NPPF, including a supply of housing which meets the needs of current and future generations, balancing growth with infrastructure provision. Therefore, it is considered that the Neighbourhood Plan will have a positive impact on local environmental assets. |
| 1(d) environmental problems relevant to the plan | No | None have been identified. There will be a small increase in the number of houses in the village as a result of new development. However, the Neighbourhood Plan will help to address wider environmental problems as highlighted in the NPPF at a local level, such as climate change, air pollution, traffic congestion, loss of biodiversity and flooding; without any negative effects. |

| Criteria for determining the likely significance of effects | Likely to have significant effects? | Justification for assessment |
|--|--|--|
| 1 (e) the relevance of the plan or programme for the implementation of community legislation on the environment (e.g. plans and programmes linked to waste management or water protection) | No | The Neighbourhood Plan complies with the East Herts planning documents and the NPPF which have taken account of existing legislation for environmental protection. |
| 2 (a) the probability, duration, frequency and reversibility of the effects | No | No significant effects have been identified. The Neighbourhood Plan will result in positive environmental effects through policies that seek to protect rural landscape setting, important heritage assets including views, and the SSSI; and have positive social and economic effects by ensuring ongoing support for leisure and business facilities and promoting walking and cycling. These positive effects are small and low frequency but are likely to be long term. |
| 2 (b) the cumulative nature of the effects | No | No significant effects have been identified. A combination of the Neighbourhood Plan, which seeks to protect and enhance the character, environment and landscape of Hunsdon and wider environmental policy in the East Herts District Plan is likely to have cumulative positive environmental effects and benefits for Hunsdon. Notwithstanding the above, the effects of the Neighbourhood Plan will be small scale. |

| Criteria for determining the likely significance of effects | Likely to have significant effects? | Justification for assessment |
|--|--|--|
| 2 (c) the trans-boundary nature of the effects | No | There are no trans-boundary effects. |
| 2 (d) the risks to human health or the environment (e.g. due to accidents) | No | No significant effects have been identified |
| 2 (e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected) | No | No significant effects have been identified. The Neighbourhood Plan aims to enhance the environment and to provide the infrastructure required to meet the social needs of Hunsdon's residents. |
| 2 (f) the value and vulnerability of the area likely to be affected due to: (i) special natural characteristics or cultural heritage (ii) exceeded environmental quality standards (iii) intensive land-use | No | <p>The Neighbourhood Plan area does contain sensitive features, although the single housing site is outside the conservation area already has planning permission and is partially built. There are no proposals in the Neighbourhood Plan which are likely to have significant environmental effects. In addition, design policies, heritage and environmental policies will protect and enhance the natural and historic environment.</p> <p>The following specific policies protect sensitive features: HE1-5; and HHC1 & 2.</p> <p>East Herts planning policies and the NPPF will also protect natural assets, listed and unlisted heritage assets and designated assets contained within the boundary of the HNAP Area.</p> |

| Criteria for determining the likely significance of effects | Likely to have significant effects? | Justification for assessment |
|---|--|--|
| <p>2 (g) the effects on areas or landscapes which have a recognised national, community or international protection status</p> <p>.</p> | <p>No</p> | <p>The Neighbourhood Plan contains policies aimed at protecting local Green Spaces, Local Wildlife Sites, Historic Parks and gardens. The following specific policies protect sensitive features: HHD5 Green Gap; HE1-5; and HHC1 & 2.</p> |

9. Screening determination

9.1 In conclusion the HNAP is not likely to have significant environmental effects and therefore a SEA is not required. The principal reasons for this conclusion are:

The HNAP Area contains sensitive features, particularly listed and scheduled heritage features, and a SSSI, but these are protected by the Neighbourhood Plan policies and not impacted by the development proposals in the Neighbourhood Plan.

The HNAP makes adequate provision within its policies to prevent or mitigate any harm that might result from new development.

APPENDIX A

Extract from Policies Map showing location of housing site allocation (partially built)

