

# Strategic Environmental Assessment (SEA) for the Mavesyn Ridware Neighbourhood Plan

SEA Environmental Report

Mavesyn Ridware Parish Council

May 2024

#### Quality information

Prepared by	Checked by	Verified by	Approved by
I.K	I.M	I.M	N.C.B
Senior Environmental Planner	Associate Consultant	Associate Consultant	Technical Director

#### **Revision History**

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#### Prepared for:

Locality and Mavesyn Ridware Parish Council

#### Prepared by:

AECOM Limited 100 Embankment Cathedral Approach Manchester M3 7FB United Kingdom aecom.com

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## **Non-Technical Summary**

#### What is Strategic Environmental Assessment?

A Strategic Environmental Assessment (SEA) has been undertaken to inform the Mavesyn Ridware Neighbourhood Plan (hereafter referred to as "the MRNP"). This process is required by the SEA Regulations.

Neighbourhood plan groups use SEA to assess neighbourhood plans against a set of sustainability objectives developed in consultation with interested parties. The purpose of the assessment is to help avoid adverse environmental and socioeconomic effects through the neighbourhood plan and identify opportunities to improve the environmental quality of the area covered by the neighbourhood plan and the quality of life of residents.

#### What is the Mavesyn Ridware Neighbourhood Plan?

The MRNP is being prepared under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012, and in the context of the adopted and emerging Local Plan for Lichfield district.

The MRNP presents a plan for the Mavesyn Ridware neighbourhood area and parish for the point that the neighbourhood plan is made to 2040. The Plan sets out a vision and a range of policies for the neighbourhood area. These relate to a range of topics, including, but not limited to, housing, open space, recreation, accessibility, heritage, environment and design.

#### **Purpose of this Environmental Report**

This Environmental Report, which accompanies the Regulation 14 version of the MRNP is the second document to be produced as part of the SEA process. The first document was the SEA Scoping Report (January 2024), which included information about the neighbourhood area's environment and community.

The purpose of this Environmental Report is to:

- Identify, describe, and evaluate the likely significant effects of the MRNP and alternatives; and
- Provide an opportunity for consultees to offer views on any aspect of the SEA process which has been carried out to date.

#### The Environmental Report contains:

- An outline of the contents and main objectives of the MRNP and its relationship with other relevant policies, plans and programmes.
- Relevant aspects of the current and future state of the environment and key sustainability issues for the area.
- The SEA Framework of objectives against which the MRNP has been assessed.
- The appraisal of alternative approaches for the MRNP.
- The likely significant effects of the MRNP.

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- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the MRNP.
- The next steps for the MRNP and accompanying SEA process.

# Consideration of reasonable alternatives for the Mavesyn Ridware Neighbourhood Plan

#### Introduction

In accordance with the SEA Regulations the Environmental Report must include:

- An outline of the reasons for selecting the alternatives dealt with; and
- The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.

Alternative approaches have been considered in relation to the housing strategy with a focus on the overall housing growth target, the redevelopment of the Blithbury site and the location of housing allocations.

#### Housing growth strategy

The Local Plan does not set out a housing requirement for the neighbourhood area. However, a Housing Needs Assessment has been undertaken which indicates that between 19 and 33 homes are required in the Mavesyn Ridware neighbourhood area to meet local needs up to 2040. Lichfield District Council has confirmed that up to 33 new homes represents the local housing need.

One alternative to housing growth would be to not allocate any sites and to rely upon windfall development. However, a key objective of the MRNP is to influence the location and type of housing development that is secured in Mavesyn Ridware. The HNA further identifies a need for rented dwellings and affordable home ownership dwellings which are less likely to be delivered through a windfall approach. Therefore, this approach is considered to be unreasonable.

A second alternative would be to pursue a higher growth strategy by allocating more housing through the MRNP. Whilst this can provide a wider range of housing choice and flexibility, there is no evidence to justify higher levels of housing growth. Therefore, this alternative is also considered to be unreasonable.

Taking the above into account, it was concluded that there were no reasonable alternatives to the level of growth proposed through the MRNP.

#### Blithbury Redevelopment

Policy MR04 of the MRNP supports the redevelopment of the Blithbury site for residential institutions (Use Class C2) and education or other community facilities (Use Class F1). The policy further supports residential development (under Use Class C3) on the site in exceptional circumstances. The site has planning permission for redevelopment to provide a residential educational facility for young people aged 8-18 (Class C2) and a supporting building (23/00221/FULM).

With the site located outside of existing settlements and in open countryside, the site is not considered to be in a sustainable location and thus not suitable for residential,

employment or other uses to those set out in Policy MR04 under the context of national and local planning policy.

Focusing on potential alternative approaches to the policy, the SEA considered that the only alternative would be to take a 'do nothing' approach. This would in effect lead to a continuation of national and local planning policy to apply to the site in a case where the planning consent is not implemented. Considering that there is strong local support for the sustainable development of the site and that the planning consent has not been implemented, a 'do nothing' approach was not determined to be a reasonable alternative.

#### Housing site allocations

A site assessment process has been undertaken by the MRNP Steering Group. A total of 10 sites have been identified in the neighbourhood area. The sites were identified through a neighbourhood plan call for sites and the Lichfield Strategic Housing Land Availability Assessment.

Seven sites were taken forward for assessment to determine whether they would be appropriate to allocate for housing development in the MRNP. Key considerations focused on whether the sites were suitable, available and achievable. The sites identified and taken forward for assessment are illustrated in **Figure 1**.

The site assessment found two sites to be suitable and appropriate for housing allocation in the neighbourhood plan. The sites include:

- Site 276: Land off Wade Lane.
- Land North of Ridware Road (excluding FZ2 and FZ3 land).

The remaining five sites were considered not suitable for allocation in the MRNP, mostly due to constraints including fluvial flood risk and unsuitable vehicular and pedestrian access.



Figure 1: Site options assessed through the neighbourhood plan site assessment

#### **Assessing reasonable alternatives**

Taking the housing growth strategy and the site options into consideration, the following three scenarios have been identified as reasonable alternative 'strategies' for the MRNP:

- Option 1: Allocate growth for up to 33 homes on Land North of Ridware Road (neighbourhood plan approach).
- Option 2: Distribute growth for up to 33 homes between Land North of Ridware Road and Land off Wade Lane.
- Option 3: Allocate growth for up to 33 homes on Land North of Rake End.

For each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability themes and objectives identified through scoping as a methodological framework and the SEA Regulations.<sup>1</sup>

Every effort is made to predict effects accurately. It has been made explicit in the appraisal text where there is a need to rely on assumptions to reach a conclusion on a 'significant effect'. Numbers are used to highlight the option or options that are preferred from an SEA perspective with 1 performing the best.

#### Summary of assessment findings

**Table 1** provides a summary of the assessment findings by setting out where significant effects are predicted and summarises the rankings of the options in terms of their relative performance for each SEA theme.

Table 1 Summary of assessment findings by SEA theme

		Option 1: Land North of Ridware	Option 2: Option 1 and Land off Wade	Option 3: Land North of Rake
SEA theme		Road	Lane	End
Biodiversity	Significant effect?	No	No	No
	Rank	1	1	1
Climate change and flood risk	Significant effect?	No	No	No
	Rank	1	2	2
Community wellbeing	Significant effect?	Yes - positive	Yes - positive	Yes - positive
	Rank	1	2	2
Historic environment	Significant effect?	No	No	No
	Rank	1	1	1
Land, soil and water resources	Significant effect?	No	No	No
	Rank	2	2	1

<sup>&</sup>lt;sup>1</sup> Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

Ontion 2. Land

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SEA theme		Option 1: Land North of Ridware Road	Option 2: Option 1 and Land off Wade Lane	North of Rake End
Landscape	Significant effect?	Yes - uncertain negative	Yes - minor negative	Yes - minor negative
	Rank	3	1	2
Transportation and movement	Significant effect?	No	No	No
	Rank	1	2	2
Water resources and quality	Significant effect?	No	No	No
	Rank	1	1	2

Overall, all options are likely to have significant positive effects in relation to community wellbeing and negative effects on landscape. All options are also likely to have similar effects under other SEA themes.

Options 1 and 2 involve a site which includes land at risk of fluvial flooding. However, development can likely be accommodated on land to the south which falls within Flood Zone 1 and falls outside areas at risk of surface water flooding. The flood risk area also falls within an area of reduction in risk of flooding from rivers and sea due to defences. Furthermore, it is considered that the provisions of the NPPF and national policy will help guide development away from flood risk areas and ensure that appropriate mitigation measures are implemented.

#### Establishing the preferred approach

The MRNP Steering Group seek to allocate Land North of Ridware Road (Option 1). The preferred approach has been informed by the various surveys and evidence base documents prepared to support the MRNP (to date), responses from community consultation events, and the findings of the site assessment and SEA.

The MRNP Steering Group's reasons for developing the preferred approach considering the assessment are identified below:

The site has no significant constraints that would preclude development and local assessment has determined that it scores well compared to alternative site options. The site would provide greatest local community benefits, including:

- 1. Improving pedestrian connections between Hill Ridware and the existing playing field on School Lane.
- 2. Frontage to B5014 providing most viable option to deliver a small convenience store to serve the parish.
- 3. Delivery of substantial new multi-functional green space and opportunities for Biodiversity Net Gain.
- 4. Enhancing the existing PRoW between Uttoxeter Road and School Lane.
- 5. Maximising the delivery of affordable housing delivery through identification of a single allocation.

## Appraisal of the Regulation 14 version of the Mavesyn Ridware Neighbourhood Plan

The draft MRNP has been appraised against each of the environmental objectives in the SEA framework. In undertaking the appriasal, each of the policies in the MRNP has been considered individually and collectively. A summary of the findings is presented in **Table 2** below.

Overall, neutral or positive effects are predicted across each SEA topic, with the exceptions being the 'Flood Risk' and 'Landscape' objectives, where uncertain negative effects are predicted relating to the allocation of 'Land East of Hill Ridware' and potential harm from fluvial flood risk. The effects on the Landscape objective are significant due to the potential for harm to landscape character. Whereas, effects are not significant under the Flood Risk objective, as existing national and local planning policy should safeguard again any potential increase in flood risk and its implication on existing and future residents.

**Table 2: Summary of overall effects for each SEA Topic.** 

SEA Topic	Overall Effects
Biodiversity and Geodiversity	Neutral effect
Climate Change	Neutral effect
Flood Risk	Uncertain minor negative effect
Community Wellbeing	Minor positive effect
Historic Environment	Moderate positive effect
Land, Soil, and Water Resources	Neutral effect
Landscape	Uncertain negative effect
Transportation and Movement	Minor positive effect

#### **Next steps**

#### Plan Finalisation

Following Regulation 14 consultation, responses will be considered in finalising the MRNP and SEA for submission. Following submission, the MRNP and supporting evidence will be published for further consultation, and then subjected to Independent Examination. At Independent Examination, the MRNP will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.

If the examination leads to a favourable outcome, the MRNP will then be subject to a referendum, organised by Lichfield District Council. If more than 50% of those who vote agree with the MRNP, then it will be 'made'. Once 'made', the MRNP will become part of the Development Plan, covering Mavesyn Ridware parish.

#### Monitoring

The SEA regulations require envisaged monitoring measures for likely significant effects to be outlined in this report. The SEA has identified potential for uncertain

significant negative effects on the Landscape objective that require closer monitoring.

It is anticipated that monitoring of effects of the MRNP will be undertaken by Lichfield District Council as part of the process of preparing its Annual Monitoring Report (AMR). It is suggested that the following issues be monitored:

- Updates to landscape character assessments.
- Planning applications for the site allocation at 'Land East of Hill Ridware'.
- Flood risk assessments in and around Hill Ridware.

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#### 1. Introduction

#### **Background**

- 1.1 Mavesyn Ridware Parish Council is in the process of preparing a neighbourhood plan for the sustainable future growth of Mavesyn Ridware. AECOM has been commissioned by Locality to undertake an independent Strategic Environmental Assessment (SEA) in support of the emerging Mavesyn Ridware Neighbourhood Plan (hereafter referred to as "the MRNP").
- 1.2 The MRNP is being prepared under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012, and in the context of the adopted and emerging Local Plan for Lichfield district. The Local Plan consists of the Lichfield Local Plan Strategy 2008-2029² (adopted 2015) and the Lichfield Local Plan Allocations 2008-2029³ (adopted July 2019). Lichfield District Council has been preparing a new local plan for the district, known as Local Plan 2040. In October 2023, Lichfield District Council made the decision to withdraw the proposed local plan from public examination.
- 1.3 The MRNP will form part of the development plan for the Mavesyn Ridware parish in Lichfield district, alongside the Local Plan. The MRNP will cover the period from the point that the neighbourhood plan is made and 2040.
- 1.4 The Mavesyn Ridware neighbourhood area is illustrated in **Figure 1.1** below.

<sup>&</sup>lt;sup>2</sup> Lichfield District Council (2015) 'Lichfield Local Plan Strategy 2008-2029' can be accessed here

<sup>&</sup>lt;sup>3</sup> Lichfield District Council (2019) 'Lichfield Local Plan Allocations 2008-2029' can be accessed here

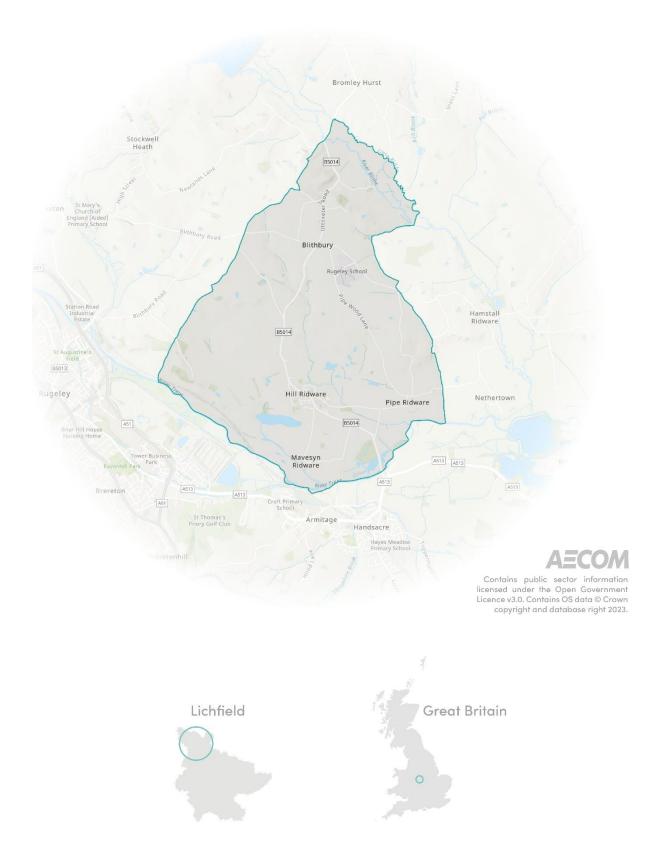


Figure 1.1: Mavesyn Ridware neighbourhood area

#### **SEA screening for the Mavesyn Ridware Neighbourhood Plan**

- 1.5 SEA is a required process for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating potential negative effects and maximising potential positive effects.<sup>4</sup>
- 1.6 The MRNP has been screened for SEA by Lichfield District Council (September 2023), stating:
  - "The MRNP allocates sites for development / re-development, the extension of the church burial ground and several Local Green Spaces. Specifically the allocations for the residential development at Hill Ridware and possible redevelopment at Blithbury is for development that is not specifically set out within the adopted Local Plan. As the plan as drafted seeks to allocate site(s) for development it is considered that SEA is required to assist in illustrating how these decisions were arrived at".
- 1.7 In light of the above, SEA is required to assess the potential for significant environmental effects.

#### **SEA** explained

- 1.8 SEA is a mechanism for considering and communicating the potential impacts of an emerging plan, and potential alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding and mitigating potential negative impacts and maximising the potential for positive effects. Through this approach, the SEA for the MRNP seeks to maximise the emerging plan's contribution to sustainable development.
- 1.9 Two key procedural requirements of the SEA Regulations are that:
  - i. When deciding on 'the scope and level of detail of the information' which must be included in the Environmental Report, there is a consultation with nationally designated authorities concerned with environmental issues; and
  - ii. A report (the 'Environmental Report') is published for consultation alongside the draft plan (i.e., the draft MRNP) that presents outcomes from the environmental assessment (i.e., discusses 'likely significant effects' that would result from plan implementation) and reasonable alternatives.
- 1.10 This 'Environmental Report' is concerned with item 'ii' above.

#### **Structure of this Environmental Report**

- 1.11 This document is the SEA Environmental Report for the MRNP and hence needs to answer all four of the questions listed overleaf with a view to providing the information required by the SEA Regulations.
- 1.12 Each of the four questions is answered in turn within this report, as follows:

<sup>&</sup>lt;sup>4</sup> Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that a neighbourhood plan is submitted to the Local Authority alongside either: A) an Environmental Report, or B) a statement of reasons why SEA is not required, prepared following a 'screening' process.

Table 1.1: Questions that must be answered by the SEA Environmental Report to meet the regulatory<sup>5</sup> requirements

Environmental Report question		In line with the SEA Regulations, the report must include <sup>6</sup>		
	What is the plan seeking to achieve?	An outline of the contents and main objectives of the plan.		
What's the scope of the SEA?	What is the sustainability 'context'?	<ul> <li>Relationship with other relevant plans and programmes.</li> <li>The relevant environmental protection objectives, established at international or national level.</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.</li> </ul>		
	What is the sustainability 'baseline'?	<ul> <li>The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan.</li> <li>The environmental characteristics of areas likely to be significantly affected.</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance.</li> </ul>		
	What are the key issues and objectives?	<ul> <li>Key problems/issues and objectives that should be a focus of (i.e., provide a 'framework' for) assessment.</li> </ul>		
What has plan-making/SEA involved up to this point?		<ul> <li>Outline reasons for selecting the alternatives dealt with.</li> <li>The likely significant effects associated with alternatives.</li> <li>Outline reasons for selecting the preferred approach in-light of alternatives appraisal/a description of how environmental objectives and considerations are reflected in the current version of the plan.</li> </ul>		
What are the as this stage?	sessment findings at	<ul> <li>The likely significant effects associated with the Regulation 14 version of the plan.</li> <li>The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the Regulation 14 version of the plan.</li> </ul>		
What happens r	next?	The next steps for the plan making / SEA process.		

Environmental Assessment of Plans and Programmes Regulations 2004
 NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

# 2. Strategic context and vision for the Mavesyn Ridware Neighbourhood Plan

#### Strategic context for the Neighbourhood Plan

- 2.1 The neighbourhood area falls within the district of Lichfield. The adopted Local Plan relevant to the neighbourhood area consists of the Lichfield Local Plan Strategy 2008-2029<sup>7</sup> (adopted 2015) and the Lichfield Local Plan Allocations 2008-2029<sup>8</sup> (adopted July 2019). The Local Plan recognises Hill Ridware (the largest settlement in the neighbourhood area) as 'other rural' in the settlement hierarchy, and does not set out a housing requirement for this settlement level.
- 2.2 Lichfield District Council has been preparing a new local plan for the district, known as Local Plan 2040. In October 2023, Lichfield District Council made the decision to withdraw the proposed local plan from public examination. Similar to the adopted Local Plan, the Local Plan 2040 did not set out a housing requirement for the neighbourhood area.
- 2.3 The Mavesyn Ridware Neighbourhood Plan will form part of the development plan for the neighbourhood area, alongside, but not as a replacement for the Local Plan. Neighbourhood plans are required to be in general conformity with the strategic policies of the adopted Local Plan and can develop policies and proposals to address local place-based issues. In this way it is intended for the Local Plan to provide a clear overall strategic direction for development in Lichfield district, whilst enabling finer detail to be determined through the neighbourhood planning process where appropriate.
- 2.4 A Housing Needs Assessment (HNA) has been undertaken for the Mavesyn Ridware neighbourhood area. The assessment indicates that between 19 and 33 homes are required in the neighbourhood area to meet local needs up to 2040. Lichfield District Council has confirmed that up to 33 new homes represents the local housing need.
- 2.5 The HNA further identifies a need for rented dwellings and affordable home ownership dwellings and recommends that opportunities for affordable housing delivery should be 'maximised' to address needs in the neighbourhood area throughout the plan period.

<sup>&</sup>lt;sup>7</sup> Lichfield District Council (2015) 'Lichfield Local Plan Strategy 2008-2029' can be accessed here

<sup>&</sup>lt;sup>8</sup> Lichfield District Council (2019) 'Lichfield Local Plan Allocations 2008-2029' can be accessed here

#### Vision and objectives for the Neighbourhood Plan

2.6 The vision of the MRNP is as follows:

"The residents of Mavesyn Ridware Parish want to protect the identity of their separate villages and support them to become stronger, safer and more sustainable communities. In achieving this, Mavesyn Ridware Parish will become better connected, with Hill Ridware representing a hub through the provision of a wider range of services for residents and visitors. Development will be supported where it meets identified local needs, can be supported by existing or improved infrastructure and is necessary to support the viability of our distinct communities. This will be achieved while protecting Mavesyn Ridwares' unique character and distinct qualities which will include preserving and enhancing the character of buildings, open spaces and other valued community facilities in each village and protecting the Parish-wide habitat features and landscape quality."

- 2.7 The vision of the MRNP is supported by six objectives. They are as follows:
  - Objective 1 Creating Sustainable Communities: To achieve a
    sustainable future for Hill Ridware, Mavesyn Ridware, Blithbury and Pipe
    Ridware, with a strong, stable and safe community supported by the right
    services and facilities, living in suitable homes, and enjoying a pleasant and
    attractive local environment.
  - Objective 2 Protecting & Enhancing Local Services: To preserve
    existing services within the Parish and to support the provision of new
    facilities within Hill Ridware in order to improve the quality of life enjoyed by
    existing and future residents and to reduce the need to travel.
  - Objective 3 Housing Needs: To ensure that the Parish population is sustainable, by providing the right housing in terms of size, type and tenure to meet current and future needs of existing residents.
  - Objective 4 High Quality Design: To ensure that any new development achieves a high standard of design, respecting the established character in each of our villages, the rural location and identified heritage assets.
  - Objective 5 Natural Environment: To protect the local landscape setting
    of our villages, to manage and, where possible, reduce flood risk, and to
    support agriculture in the surrounding countryside where this does not
    conflict with the quality of life enjoyed by existing and future residents.
  - Objective 6 Managing Change: To ensure that the quality of life enjoyed by the residents of Mavesyn Ridware Parish and the character of the villages and surrounding countryside are protected from inappropriate new development, including in terms of residential amenity and traffic impact.

## 3. The scope of the SEA

#### **Summary of SEA scoping**

- 3.1 The SEA Regulations require that: "When deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies".
- 3.2 In England, the consultation bodies are Natural England, the Environment Agency, and Historic England. These authorities were consulted on the scope of the SEA for a 5-week period between January and March 2024.
- 3.3 The purpose of scoping was to outline the 'scope' of the SEA through setting out the following information:
  - A context review of the key environmental and sustainability objectives of national, regional, and local plans and strategies relevant to the MRNP.
  - Baseline data against which the MRNP can be assessed.
  - The key sustainability issues for the MRNP; and
  - An 'SEA Framework' of objectives against which the MRNP can be assessed.
- 3.4 The above scope was collated in a report (herein referred to as 'Scoping Report'). The full Scoping Report is attached as **Appendix B** to this report.
- 3.5 Historic England and Environment Agency provided a response to the Scoping Report. A summary of the comments made and how they have been considered and addressed, are presented in **Table 3.1** below. The scoping responses are provided in **Appendix A**.

Table 3.1: Consultation responses received on the SEA Scoping Report

Consultation response	How the response was considered and addressed

Historic England

Historic Places Adviser (letter received via email on 16th February 2024)

Historic England have no substantive concerns as to the contents of the document. Comment noted.

**Environment Agency** 

Planning Specialist (letter received via email on 7th March 2024)

The NP should offer robust confirmation that development is not impacted by flooding and that there is sufficient waste water infrastructure to accommodate growth for the duration of the plan period.

Comment noted. The SEA has considered the potential impact of flooding and water infrastructure.

The scoping themes appear to incorporate the 'SEA topics' suggested by Annex I(f) of the SEA Directive and appear reasonable to reflect the purpose of the scoping report and its potential environmental effects.

Comment noted.

<sup>&</sup>lt;sup>9</sup> These consultation bodies were selected "by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effect of implementing plans and programmes" (SEA Directive, Article 6(3)).

## Consultation response

## How the response was considered and addressed

The SEA should consider the Environment Agency's Climate Change Guidance for West Midlands and use the pro-forma provided.

The climate change guidance and pro-forma has informed the SEA process.

The SEA objectives and questions appear reasonable to help create, enhance and connect habitats, species and/or sites of biodiversity interest. Reference to the Government's 25 Year Environment Plan and recognition of the embedding 'net gain' principles as part of the Environment Act 2021 is welcomed.

Comment noted.

The neighbourhood area to the north (River Blythe) and South (River Trent) fall within Flood Zones 2 and 3. Environment Agency mapping primarily shows flooding from Main Rivers, not ordinary watercourses, or un-modelled rivers, with a catchment of less than 3km². As such, for any additional allocations, it should not be assumed that these ordinary watercourses do not have floodplains and there may be slightly more of the site affected by flood risk than is immediately expected just from reference to the Flood Zone Mapping. Some assessment of flood risk associated with these unmodelled watercourses may be necessary as part of any supporting evidence base.

The SEA has considered the potential flood risk impacts associated with the MRNP policies and proposals.

Surface water (pluvial) flooding should be discussed with Lichfield District Council as the Lead Local Flood Authority.

Future development should protect, enhance and minimise the impact upon the water environment.

Comment noted.

#### Key sustainability issues

- 3.6 Drawing on the review of the policy context and baseline information, it was possible to identify a range of sustainability and environmental issues that should be a particular focus of SEA. This section sets out a summary of the key issues that were identified through scoping.
- 3.7 The selected environmental themes incorporate the 'SEA topics' suggested by Annex I(f) of the SEA Directive.<sup>10</sup> These were refined to reflect a broad understanding of the anticipated scope of plan effects (drawing from the screening opinion and local knowledge).
- 3.8 The scoping process allowed for some sustainability topics to be 'scoped out'; as it was considered the MRNP is unlikely to have significant effects on certain factors. Environment Agency, Natural England and Historic England have not raised any concerns in regards the scoping out of any sustainability topics.

<sup>&</sup>lt;sup>10</sup> The SEA Directive is 'of a procedural nature' (para 9 of the Directive preamble) and does not set out to prescribe particular issues that should and should not be a focus, beyond requiring a focus 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' [our emphasis]

3.9 The sustainability and environmental issues identified at the scoping stage and their scoping outcome under each environmental theme is as follows:

#### Air Quality

- There are two AQMAs within Lichfield district; however, these are neither within or in close proximity to the Mavesyn Ridware neighbourhood area.
- The MRNP could present opportunities to improve accessibility and support more local and sustainable journeys / connections.

#### **SCOPED OUT**

#### **Biodiversity and Geodiversity**

- There are no internationally designated sites within or in close proximity to the neighbourhood area and there are no nationally designated sites within the neighbourhood boundary. The Blithfield Reservoir Site of Special Scientific Interest (SSSI) is approximately 1.6km to the north-west of the neighbourhood area.
- The Cannock Chase Special Area of Conservation (SAC) is located approximately 4.3km to the west of the neighbourhood area. It is possible an increase in the built footprint of Mavesyn Ridware will impact upon the designation through additional recreational pressure and poorer air quality.
- There are parts of the neighbourhood area that are within Network Enhancement Zone 1, Network Enhancement Zone 2, and the Network Expansion Zone.
- There are areas of priority habitat located across the neighbourhood area, including ancient woodland.

#### **SCOPED IN**

#### Climate Change and Flood Risk

- Lichfield District Council declared a climate and ecological emergency in 2019 and has set out a plan with actions to achieve carbon neutrality.
- Carbon dioxide (CO<sub>2</sub>) emissions in Lichfield district have decreased by 249.6 kilotons of CO<sub>2</sub> equivalent between 2005 and 2021. The transport sector continues to be a key challenge in terms of reducing emissions.
- The neighbourhood area is at risk of varying levels of fluvial flooding and includes areas of Flood Zone 2 and Flood Zone 3 (associated with watercourses within the north and south of the neighbourhood area). Surface water flood risk is prevalent across the Mavesyn Ridware neighbourhood area, especially to the east and west of Hill Ridware. Surface water run-off from development can exacerbate the risk of flooding by increasing the run-off from land to water courses.

#### **SCOPED IN**

#### **Community Wellbeing**

• The population is increasing, and there is a need to identify a land supply for future housing growth as part of planned and coordinated development. The area is also experiencing an ageing population.

- The neighbourhood area has low levels of overall deprivation. However, the IMD 2019 data suggests there are high levels of deprivation related to barriers to housing and services. A HNA has been undertaken which has identified a strong need for affordable housing.
- Mavesyn Ridware residents on average have reported to have better levels
  of health compared to the Lichfield, regional and national trends.

#### **SCOPED IN**

#### Historic Environment

- With a wealth of both designated and non-designated heritage assets
  within and surrounding the neighbourhood area, development of the MRNP
  provides an opportunity to consider growth strategies that avoids or
  minimises negative impacts for the historic environment whilst seeking
  enhancements.
- There are 25 listed buildings within the neighbourhood area: 20 Grade II listed buildings, three Grade II\* listed buildings, and two Grade I listed buildings (These are the Church of St Nicholas, and the Gatehouse at Old Hall).
- There is one conservation area within the Mavesyn Ridware neighbourhood area. It covers the settlement of Mavesyn Ridware and some of the surrounding land.
- None of the nationally designated heritage assets within the neighbourhood area are on the Heritage at Risk Register 2022 for the Midlands.
- The Staffordshire Historic Environment Record (HER) returns 106 results for the neighbourhood area.

#### **SCOPED IN**

#### Land, Soil, and Water Resources

- The provisional ALC data indicates the neighbourhood area is underlain with areas of Grade 2, Grade 3 and Grade 4 agricultural land.
- The neighbourhood area falls into two operational catchments: the Trent -Sow to Tame Rivers and Lakes, and the Blithe Rivers and Lakes.
- The neighbourhood area overlaps with one nitrate vulnerable zone (NVZ) the River Trent (source to confluence with Derwent), which is designated for surface water.
- The neighbourhood area sits within a mineral safeguarding area for all minerals except coal and fireclays.
- Plan making should consider how local decisions affect water supply, such as water accessibility issues, and ensure that appropriate drainage infrastructure is in place to accommodate new development areas.

#### **SCOPED IN**

#### Landscape

- The neighbourhood area sits within one National Character Area (NCA) 68: Needwood and South Derbyshire Claylands. This is characterised by a rolling plateau that slopes from the Peak District to the River Trent valley.
- The neighbourhood area does not fall within a National Park, National Landscape or other national landscape designations.
- There are a number of TPOs in the neighbourhood area, which are important features of the settlements and likely contribute to a number of views. New development through the Mavesyn Ridware Neighbourhood Plan should avoid visual impacts to and from these TPOs where possible to maintain the character and quality of settlements within the neighbourhood area.
- New development has the potential to lead to incremental change in landscape and townscape character, and visual amenity.

#### **SCOPED IN**

#### **Transportation and Movement**

- There are a number of public rights of ways (PRoWs) to allow for safe and active connections and transportation opportunities within the neighbourhood area, and to locations outside it.
- Public transport opportunities for residents in Mavesyn Ridware include two school bus services, which undertake one return journey a day, Monday-Friday during school term time. Additionally, there is a daily public bus service that operates through Hill Ridware along the B5015 - stopping once a day in either direction, Monday-Friday. There are rail stations in proximity that allow for access to a wider variety of locations.
- As the MRNP is seeking to allocate sites for development, there will be an inevitable change in the current transportation and movement baseline. Given the limited sustainable transport options within the neighbourhood area, it is likely the change will be focused on an increase in private vehicles on the local road network.

**SCOPED IN** 

#### **SEA Framework**

- 3.10 The SEA framework has been established through the identification of key issues and environmental objectives as part of the scoping exercise. This draws upon the baseline position and policy context that has been prepared for SEA topics.
- 3.11 The framework consists of a set of headline objectives and ancillary questions, which has been used to appraise the environmental effects of the draft MRNP (and any reasonable alternatives).
- 3.12 Table 3.2 outlines the full SEA Framework. This SEA Framework provides a methodological framework for the appraisal of likely significant effects on the baseline.

Table 3.2: MRNP SEA Framework			
SEA theme	SEA objective	Supporting assessment questions	
Biodiversity and geodiversity	Protect and enhance biodiversity and geodiversity.	Protect and enhance nationally and locally designated sites, including supporting habitats and mobile species that are important to the integrity of these sites?    Protect and enhance again actually believes as well.	
		<ul> <li>Protect and enhance semi-natural habitats as well as priority habitats and species?</li> </ul>	
		<ul> <li>Achieve biodiversity and environmental net gains and support the delivery of ecosystem services and multifunctional green infrastructure networks?</li> </ul>	
		<ul> <li>Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks?</li> </ul>	
		<ul> <li>Support access to, interpretation and understanding of biodiversity and geodiversity?</li> </ul>	
Climate change and flood risk	Reduce the contribution to climate change made by activities within the neighbourhood area and increase resilience to the potential effects of climate change.	<ul> <li>Avoid vulnerable development in areas of high flood risk, taking into account the likely future effects of climate change?</li> </ul>	
		<ul> <li>Reduce the number of journeys made and reduce the need to travel?</li> </ul>	
		<ul> <li>Promote the use of more sustainable modes of transport, including walking, cycling, public transport, and electric vehicle (EV) infrastructure?</li> </ul>	
		<ul> <li>Increase the number of new developments meeting or exceeding sustainable design criteria?</li> </ul>	
		<ul> <li>Generate energy from low or zero carbon sources, or reduce energy consumption from non- renewable resources?</li> </ul>	
		<ul> <li>Improve and extend green infrastructure networks in the neighbourhood area?</li> </ul>	
		<ul> <li>Sustainably manage water run-off, and reduce runoff where possible?</li> </ul>	
		<ul> <li>Increase the resilience of biodiversity in the area to the effects of climate change, including through enhancements to ecological networks?</li> </ul>	

#### **SEA** theme **SEA** objective Supporting assessment questions Provide everyone with the opportunity to live in Community Ensure growth in the neighbourhood area is wellbeing good quality, affordable housing? aligned with the needs of Support the provision of a range of house types all residents, improving and sizes? accessibility, anticipating Meet the needs of all sectors of the community? future needs and specialist Provide flexible and adaptable homes that meet requirements, and people's needs, particularly the needs of an ageing supporting cohesive and population? inclusive communities. Improve the availability and accessibility of key local facilities, including health infrastructure? Encourage and promote social cohesion and active involvement of local people in community activities? Facilitate green infrastructure enhancements, including improved access to open space? Maintain or enhance the quality of life of existing residents? Historic Protect, conserve, and Protect the integrity of Mavesyn Ridware Conservation Area, and its setting? environment enhance the historic environment within and Conserve and enhance buildings and structures of surrounding the architectural or historic interest, both designated neighbourhood area. and non-designated, and their settings? Protect the integrity of the historic setting of key monuments of cultural heritage interest as listed in the Staffordshire HER? Support the undertaking of early archaeological investigations and, where appropriate, recommend mitigation strategies? Support access to, interpretation and understanding of the historic evolution and character of the neighbourhood area? Land, soil, and Ensure the efficient and Promote the use of previously developed land wherever possible? water resources effective use of land, and protect and enhance water Identify and avoid the development of the best and quality, using water most versatile agricultural land? resources in a sustainable Support the minimisation, reuse, and recycling of manner. waste? Avoid any negative impacts on water quality and support improvements to water quality? Ensure appropriate drainage and mitigation is delivered alongside proposed development? Protect waterbodies from pollution? Maximise water efficiency and opportunities for water harvesting and/or water recycling? Avoid any negative impacts on mineral and waste infrastructure? Landscape Protect and enhance the Protect and / or enhance local landscape character and quality of place? character and quality of the immediate and surrounding . Conserve and enhance local identity, diversity, and landscape. settlement character? Identify and protect locally important viewpoints which contribute to character and sense of place?

SEA theme	SEA objective	Supporting assessment questions	
		<ul> <li>Retain and enhance landscape features that contribute to the water setting, or rural setting, including trees and hedgerows?</li> </ul>	
transport use and active to encourage the		<ul> <li>Support the objectives within the Staffordshire LTP to encourage the use of more sustainable transport modes?</li> </ul>	
	reduce the need to travel.	<ul> <li>Encourage a shift to more sustainable forms of travel and enable sustainable transport infrastructure enhancements?</li> </ul>	
		<ul> <li>Improve local connectivity and pedestrian and cyclist movement?</li> </ul>	
		<ul> <li>Facilitate working from home to reduce the use of private vehicles to access workplaces outside of the neighbourhood area?</li> </ul>	
		<ul> <li>Reduce the impact of the transport sector on climate change?</li> </ul>	
		<ul><li>Improve road safety?</li></ul>	
		<ul> <li>Reduce the impact on residents from the road network?</li> </ul>	

# 4. Consideration of reasonable alternatives through the SEA

#### Introduction

- 4.1 In accordance with the SEA Regulations the Environmental Report must include:
  - An outline of the reasons for selecting the alternatives dealt with; and
  - The likely significant effects on the environment associated with alternatives
     / an outline of the reasons for selecting the preferred approach in light of
     alternatives appraised.
- 4.2 The 'narrative' of plan-making / SEA up to this point is told within this part of the Environmental Report. Specifically, how the SEA process to date has informed the consideration of different approaches for key elements of the MRNP.

#### Overview of plan making and SEA work undertaken

- 4.3 Lichfield District Council formally designated Mavesyn Ridware parish as a neighbourhood area in December 2019.
- 4.4 Since designation, the MRNP Steering Group have gathered evidence and undertaken consultation with local communities and other key stakeholders to identify the issues and opportunities that need to be addressed in the MRNP. This has included a site identification and assessment process.
- 4.5 The first step in the SEA process was the preparation of a Scoping Report, which was published for consultation in January 2024. The SEA process is being delivered by AECOM as part of the Locality Technical Support Programme.
- 4.6 AECOM has worked alongside the MRNP steering group to identify and appraise any reasonable alternatives, to ensure that the SEA helps to inform the approaches and policies within the draft neighbourhood plan.

#### **Establishing reasonable alternatives**

- 4.7 A key element of the SEA process is the appraisal of 'reasonable alternatives' for the MRNP. The SEA Regulations<sup>11</sup> are not prescriptive as to what constitutes a reasonable alternative, stating only that the Environmental Report should present an appraisal of the 'plan and reasonable alternatives taking into account the objectives and geographical scope of the plan'.
- 4.8 Case-law (most notably Friends of the Earth Vs. Welsh Ministers, 2015) has established that planning authorities may apply discretion and planning judgement when determining what should reasonably be the focus of alternatives appraisal, recognising the need to apply a proportionate approach and ensure an SEA process / report that is focused and accessible.

<sup>&</sup>lt;sup>11</sup> Environmental Assessment of Plans and Programmes Regulations 2004

4.9 Alternative approaches have been considered in relation to the housing strategy with a focus on the overall housing growth target, the redevelopment of the Blithbury site and the location of housing allocations. This section describes how the SEA process has informed the proposed development strategy for the MRNP.

#### Housing growth strategy

- 4.10 Overall housing numbers (targets) are primarily the responsibility of the Local Planning Authority, Lichfield District Council. As set out in Section 2 of this report, the Local Plan does not set out a housing requirement for the neighbourhood area. However, a HNA has been undertaken for the Mavesyn Ridware neighbourhood area. The assessment indicates that between 19 and 33 homes are required in the neighbourhood area to meet local needs up to 2040. Lichfield District Council has confirmed that up to 33 new homes would be suitable for allocation under the Mavesyn Ridware Neighbourhood Plan.
- 4.11 The housing need equates to approximately one or two dwellings per year between 2023 and 2040. One alternative to housing growth would be to not allocate any sites and to rely upon windfall development. However, a key objective of the MRNP is to influence the location and type of housing development that is secured in Mavesyn Ridware. The HNA further identifies a need for rented dwellings and affordable home ownership dwellings which are less likely to be delivered through a windfall approach. Therefore, this approach is considered to be unreasonable, and essentially reflects the 'baseline position'.
- 4.12 A second alternative would be to pursue a higher growth strategy by allocating more housing through the MRNP. Whilst this can provide a wider range of choice and flexibility in delivering additional housing, there is no evidence to justify higher levels of housing growth. The housing target of up to 33 homes has also been discussed and agreed with Lichfield District Council. Therefore, this alternative is also considered to be unreasonable.
- 4.13 Taking the above into account, it was concluded that there were no reasonable alternatives to the level of growth proposed through the MRNP at this stage.

#### Blithbury Redevelopment

- 4.14 Policy MR04 of the Neighbourhood Plan supports the redevelopment of the Blithbury site for residential institutions (Use Class C2) and education or other community facilities (Use Class F1). The policy further supports residential development (under Use Class C3) on the site in exceptional circumstances. The site has planning permission for redevelopment to provide a residential educational facility for young people aged 8-18 (Class C2) and a supporting building (23/00221/FULM).
- 4.15 With the site located outside of existing settlements and in open countryside, the site is not considered to be in a sustainable location and thus not suitable for residential, employment or other uses to those set out in Policy MR04 under the context of national and local planning policy.

4.16 Focusing on potential alternative approaches to the policy, the SEA (in consultation with the MRNP Steering Group) considered that the only alternative would be to take a 'do nothing' approach. This would in effect lead to a continuation of national and local planning policy to apply to the site in a case where the planning consent is not implemented. Considering that there is strong local support for the sustainable development of the site and that the planning consent has not been implemented, a 'do nothing' approach was not determined to be a reasonable alternative which needed appraising.

#### Housing site allocations

- 4.17 A site assessment process has been undertaken by the MRNP Steering Group. A total of 10 sites have been identified in the neighbourhood area. The sites were identified through a neighbourhood plan call for sites and the Lichfield Strategic Housing Land Availability Assessment.<sup>12</sup>
- 4.18 As part of the initial sifting process, sites with existing planning permission and sites not adjacent or in proximity to Hill Ridware were omitted due to conflicts with national and local planning policy, as these sites are located in open countryside with limited services and facilities.
- 4.19 The remaining seven sites were taken forward for assessment to determine whether they would be appropriate to allocate for housing development in the MRNP. Key considerations focused on whether the sites were suitable, available and achievable. The sites identified and taken forward for assessment are illustrated in **Figure 4.1**.
- 4.20 The site assessment found two sites to be suitable and appropriate for housing allocation in the neighbourhood plan. The sites include:
  - Site 276: Land off Wade Lane.
  - Land North of Ridware Road (excluding FZ2 and FZ3 land).
- 4.21 The remaining five sites were considered not suitable for allocation in the MRNP, mostly due to constraints including fluvial flood risk and unsuitable vehicular and pedestrian access.

<sup>&</sup>lt;sup>12</sup> Lichfield District Council (2013): 'Strategic Housing Land Availability Assessment', [online] available here



Figure 4.1: Site options assessed through the neighbourhood plan site assessment

4.22 For the purposes of SEA, the site assessment conclusions have been revisited to consider if site options present a reasonable alternative option to the preferred approach in the MRNP. **Table 4.1** sets out a summary of the site assessment conclusions and an assessment on if the site is a reasonable alternative for the purposes of SEA.

Table 4.1: Site assessment conclusions and assessment of reasonable alternative for the purposes of SEA

## Site name Site assessment conclusion Reasonable alternative?

Land to rear of Orchard Court (348) Adjacent to agricultural and residential uses. Grade 3 agricultural land. Eastern part of site within Flood Zone 3. Areas of high risk of surface water flooding within east of site. Listed buildings not adjacent to site although Grade II\* building to west of Rake End. TPO adjacent site. Within mineral safeguarding area. Within area with possibility of coal subsidence. Within 0-8km of Cannock Chase SAC zone of influence. Within 500m of SBIs (Quinton's Orchard and Lawnmeadow Covert & Ridware Hall). Site comprises pasture land and numerous field parcels with hedgerows and hedgerow trees. Brook course runs through site. No highways frontage or footway connection. PRoW runs through site (11) and to the east of the site (19). The whole area around Hill Ridware falls within the area Environmental Health and National Coal Board have identified as an area for possible subsidence. Not considered suitable.

No. The eastern part of the site falls within FZ3. The western part of the site could potentially be suitable for some growth, but it is unclear if a suitable access can be provided and if the site is available for partial development.

#### Land off Wade Lane (276)

Grade 3 agricultural land. Close to Ridware Hall (Grade II Listed) and TPOs adjacent to site. Possibility of surface water flooding and risk of coal subsidence. Within 0-8km of Cannock Chase SAC. Approximately 100m from Lawnmeadow Covert & Ridware Hall SBI and within 1km of SBI (Carwarden Springs Wood). Pastoral land with hedgerows confined to site boundaries. Access achievable from Wade Lane although no existing footway connection into village. PRoW 12 runs along northern site boundary. The whole area around Hill Ridware falls within the area Environmental Health and National Coal Board have identified as an area for possible subsidence. Considered suitable.

Yes. The site does not fall within an area at risk of fluvial flooding. A suitable access could potentially be provided, and the site does not have any known availability or achievability issues.

#### Site name

#### Site assessment conclusion

#### Reasonable alternative?

#### Land East of Church Lane (246)

Majority Grade 2 agricultural land, Within flood zone 2 and part of site at low risk of surface water flooding. Within mineral safeguarding area. Within area with possibility of coal subsidence. No nearby listed buildings. Within 0-8km of Cannock Chase SAC zone of influence. Within 200m of Lawnmeadow Covert & Ridware Hall SBI and within 1km of other SBIs (Quinton's Orchard and Bailey Bridge Wetland a& Stitch Covert). Site comprises rear gardens and horse paddocks with hedgerows with interspersed trees present. Access would be off Church Lane (narrow country road) with no footway present. The whole area around Hill Ridware falls within the area Environmental Health and National Coal Board have identified as an area for possible subsidence. Not considered suitable.

No. Site falls within FZ2.

## Land North of Ridware Road

Adjacent to agricultural and residential uses. Majority Grade 2 agricultural land. Parts of site within Flood Zones 2 and 3. Part closest to Uttoxeter Road within Flood Zone 1. Central part of site and northeastern quadrant has a low risk of surface water flooding. No nearby listed buildings. Within 0-8km of Cannock Chase SAC zone of influence. Within 500m of Lawnmeadow Covert & Ridware Hall SBI and 1km of other SBIs (Quinton's Orchard and Bailey Bridge Wetland & Stitch Covert). Site is intensively farmed arable land with hedgerows confined to boundaries. Access achievable from Ridware Road and existing footway access from Uttoxeter Road. PRoW 15 runs along western site boundary. The whole area around Hill Ridware falls within the area Environmental Health and National Coal Board have identified as an area for possible subsidence. Site excluding FZ2 and FZ3 areas considered suitable.

Yes. The northern part of the site falls within FZ2 and FZ3. The southern part of the site falls within FZ1. The site is available for partial development (built development confined to land within FZ1). A suitable access could potentially be provided, and the site does not have any known availability or achievability issues.

## Land West of Church Lane

Adjacent to agricultural and residential uses. Within Flood Zone 2. No identified issue of surface water flooding. Majority Grade 2 agricultural land. Within the vicinity of Ridware Hall. Within 0-8km of Cannock Chase SAC zone of influence. Adjacent to Lawnmeadow Covert & Ridware Hall SBI and within 1km of other SBIs (Cawarden Springs Wood and Bailey Bridge Wetland & Stitch Covert). Site is intensively farmed arable land with young hedgerows confined to boundaries. Access would be off Church Lane (narrow country road) with no footway present. PRoW 39(a) within north western corner of site. The whole area around Hill Ridware falls within the area Environmental Health and National Coal Board have identified as an area for possible subsidence. Not considered suitable.

No. Site falls within FZ2.

#### Site name Site assessment conclusion

#### Land North of Rake End

Adjacent to agricultural and residential uses. Majority Grade 2 agricultural land. Within Flood Zone 1. Parts of site have a high risk of surface water flooding. Listed buildings in the vicinity of the site, however there is intervening built development. Within 0-8km of Cannock Chase SAC zone of influence. Within 1km of SBIs (Pipe Wood, Pipe Wood Lane (hedge 4), Lawnmeadow Covert & Ridware Hall, Quinton's Orchard and Cawarden Springs Wood). Site is intensively farmed arable land with hedgerows confined to boundaries. Access achievable from Rake End but no existing footway connection into village. The whole area around Hill Ridware falls within the area Environmental Health and National Coal Board have identified as an area for possible subsidence. Not considered suitable.

#### Reasonable alternative?

Yes. The site does not fall within an area at risk of fluvial flooding. A suitable access could potentially be provided, and the site does not have any known availability or achievability issues.

#### Land Adjacent to Greywood Rise

Adjacent to agricultural and residential uses. Majority Grade 3 agricultural land. Parts of site within Flood Zones 2 and 3, particularly southernmost field parcel. Part to North of Greywood Rise within Flood Zone 1. Southern field has high risk of surface water flooding. No nearby listed buildings. Within 0-8km of Cannock Chase SAC zone of influence. Within 450m of Quintons Orchard SBI and 1km of other SBIs (Lawnmeadow Covert, Pipewood Lane hedge and Bailey Bridge Wetland & Stitch Covert). Site is in pastoral use with hedgerows confined to boundaries. Access is likely to be achievable only from Greywood Rise however the site does not seem to be connected to the adopted highway within the Greywood Rise estate. The whole area around Hill Ridware falls within the area **Environmental Health and National Coal Board** have identified as an area for possible subsidence. Not considered suitable.

No. The site partially falls within FZ2 and FZ3. The area of the site adjacent to Hill Ridware does not fall within an area at risk of fluvial flooding. It is unknown if the site is available for partial development.

#### **Assessing reasonable alternatives**

- 4.23 Taking the housing growth strategy and the site options into consideration, the following three scenarios have been identified as reasonable alternative 'strategies' for the MRNP:
  - Option 1: Allocate growth for up to 33 homes on Land North of Ridware Road (neighbourhood plan approach).
  - Option 2: Distribute growth for up to 33 homes between Land North of Ridware Road and Land off Wade Lane.
  - Option 3: Allocate growth for up to 33 homes on Land North of Rake End.

#### Methodology

- 4.24 For each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability themes and objectives identified through scoping (**see Table 3.2**) as a methodological framework. Where appropriate neutral effects or uncertainty has been noted.
- 4.25 Every effort is made to predict effects accurately. It has been made explicit in the appraisal text where there is a need to rely on assumptions to reach a conclusion on a 'significant effect'.
- 4.26 Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. Numbers are used to highlight the option or options that are preferred from an SEA perspective with 1 performing the best. A high performing site can be made more sustainable with suitable mitigation and enhancement, as the ranking and assessment does not assume the likely mitigation and enhancement measures which may come forward through policy.
- 4.27 It is also important to note that effects are predicted considering the criteria presented within the SEA Regulations.<sup>13</sup> So, for example, account is taken of the duration, frequency, and reversibility of effects.

#### Biodiversity and geodiversity

	Option 1: Land North of Ridware Road	Option 2: Option 1 and Land off Wade Lane	Option 3: Land North of Rake End
Significant effect?	No	No	No
Rank	1	1	1

4.28 The significance of effects in relation to biodiversity is considered to be dependent on the design and layout of new development and the integration of green infrastructure that supports ecological resilience and connectivity in the area. As such, if all development seeks to integrate these elements, then all options could theoretically perform equally in terms of impact on biodiversity.

<sup>&</sup>lt;sup>13</sup> Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

- 4.29 The significance of the effects from each option on features and areas of biodiversity interest therefore largely depends on the detailed location, scale and nature of development and the incorporation of biodiversity enhancement measures. None of the options intersect with a designated site or are known to contain any priority habitat and all options also propose the same scale of growth.
- 4.30 It is important to recognise that potential impacts to ecological and geological resources are influenced by a number of factors. For example, incorporating green infrastructure enhancements (including amenity and open spaces) through new development areas can deliver net-gains for nature, tackle local air quality concerns by widening tree and vegetation cover, and increase the number of alternative spaces for recreational uses. All options present opportunities to introduce new green infrastructure and habitats and should be able to support biodiversity net gain.

#### Climate change and flood risk

	Option 1: Land North of Ridware Road	Option 2: Option 1 and Land off Wade Lane	Option 3: Land North of Rake End
Significant effect?	No	No	No
Rank	1	2	2

- 4.31 Given the small scale of development being proposed under all options, no significant effects are considered likely in relation to climate change mitigation. All options are also considered to have equal potential to deliver small scale renewables and efficiency measures through good design, materials use and energy efficiency of new buildings.
- 4.32 Option 1 is in close proximity to the primary school and in closest proximity to the village pub, with good opportunity to support active travel in local journeys. As a result, Option 1 is considered to rank marginally better than the other options which involve less favourably located sites.
- 4.33 Part of Option 1 falls within Flood Zones 2 and 3, however, development can likely be accommodated on land to the south which falls within Flood Zone 1 and falls outside areas at risk of surface water flooding. The flood risk area also falls within an area of reduction in risk of flooding from rivers and sea due to defences. Furthermore, it is considered that the provisions of the NPPF and national policy will help guide development away from flood risk areas and ensure that appropriate mitigation measures are implemented.
- 4.34 Other site options fall outside of areas at risk of fluvial flooding and whilst Option 3 includes large areas at risk of surface water flooding, this can likely be appropriately mitigated through design and sustainable drainage systems.

#### Community wellbeing

Option 1: Land North of Ridware Road

Option 2: Option 1 and Land off Wade Lane

Option 3: Land North of Rake End

Significant effect?	Yes - positive	Yes - positive	Yes - positive
Rank	1	2	2

- 4.35 All options are considered likely to perform well in relation to this theme through the additional delivery of housing that will be targeted towards meeting local needs for more affordable and smaller homes. The sensitive development of Land off Wade Lane is unlikely to trigger the requirement for affordable housing, due to the small site area. By potentially delivering a few additional affordable housing units, Options 1 and 3 are predicted to have marginally enhanced positive effects.
- 4.36 Hill Ridware is supported by a reasonable range of services and facilities. Option 1 is most ideally located, followed by Option 2, to local facilities including the village primary school, village pub and village hall. Option 3 is located at the northern settlement edge, slightly further afield but still within reasonable access to local facilities. Distributing growth between two sites, as proposed under Option 2, could undermine the viability for a potential new convenience store.
- 4.37 The benefits to physical and mental health and wellbeing resulting from close contact to the natural environment are well documented. All options benefit from good access to open countryside and Options 1 and 2 fall in close proximity to local green spaces.

#### Historic environment

Option 1: Land North of Ridware Road

Option 2: Option 1 and Land off Wade Lane

Option 3: Land North of Rake End

No No No

Rank 1 1 1 1

4.38 Hill Ridware includes a number of Grade II and Grade II\* listed buildings. All site option do not overlap with any listed buildings or any other known designated or non-designated heritage assets or features. The Grade II listed Ridware Hall and attached coach house and stables is located to the south east of Land off Wade Lane. However, development is unlikely to have an adverse effect on the listed building and its setting as the site is screened by a dense area of trees and hedgerows. Similarly, built development and trees intervenes the listed buildings to the south of Option 3, and the buildings have a contained setting relating closely to their curtilage.

#### Land, soil and water resources

Option 1: Land North of Ridware Road

Option 2: Option 1 and Land off Wade Lane

Option 3: Land
North of Rake End

Significant effect?	No	No	No
Rank	2	2	1

- 4.39 Development at Option 1 would involve the loss of Grade 3a agricultural land, and development through Option 3 would involve the loss of Grade 2 agricultural land. However, given the scale of development proposed, no significant effects are considered likely. Whilst Option 2 involves distributing some growth on Land off Wade Lane which falls within Grade 3 land. This is not likely to reduce the impact from the loss of Grade 2 agricultural land at Land North of Ridware Road as development is likely to impede its use for agricultural purposes.
- 4.40 In relation to water resources, the scale of housing across all options is unlikely to lead to any significant impacts at the catchment level. In terms of water quality, Option 1 is in proximity to Bentley Brook and includes areas at risk of fluvial flooding. Housing and sensitive uses can likely be accommodated on land outside of areas of flood risk and natural buffers and sustainable drainage systems can likely be implemented to protect water quality. However, by avoiding development in proximity to watercourses and areas of flood risk, Option 3 is considered to perform very marginally better than Options 1 and 2.

#### Landscape

	Option 1: Land North of Ridware Road	Option 2: Option 1 and Land off Wade Lane	Option 3: Land North of Rake End
Significant effect?	Yes - uncertain negative	Yes - minor negative	Yes - minor negative
Rank	3	1	2

- 4.41 The neighbourhood area does not fall within or in close proximity to any statutory national landscape designations. However, all options involve sites with landscape features which are intrinsic to local landscape character. Impacts on these features including boundary hedgerows and trees can likely be minimised through sensitive design, although some harm for all options is likely. All options further present opportunities to incorporate and enhance existing landscape features and introduce new green infrastructure to reduce landscape and visual impact from development.
- 4.42 Development at Option 3 would involve extending the built area of the village beyond a well-defined settlement edge comprising dense hedgerows and trees, and housing and gardens positioned to discourage growth to the north. The site is also open in character with some long-distance views to the east and the west. Development would also involve the infilling of a gap between Hill Ridware and a vacant homestead in open countryside, and thus appear as a significant linear extension of the built area. This is likely to derive minor negative effects on landscape character.

- 4.43 The settlement edge to the east of Hill Ridware is weakly defined with some undisturbed views including long-distance views of the built area from the east. Development at Option 1 presents opportunities to introduce new landscape features and green infrastructure to support a natural transition between the built area and open countryside. This is supported by existing trees and hedgerows along the western boundary of the site. However, such opportunities are likely to be limited by on-site flood constraints which will require development to be concentrated in a linear area along Ridware Road. Furthermore, the full extent of land at risk of flooding is currently unknown and subject to detailed flood risk studies. There is potential for this to require the reprofiling or raising of land or reduce the developable area of the site and thus a higher density of development. Therefore, uncertain negative effects are possible. Some harm to landscape character is also likely from the narrowing of the existing gap between the built area of Hill Ridware and the isolated farmhouse to the east.
- 4.44 Option 2 involves distributing growth between Option 1 and Land off Wade Lane. This is likely to reduce pressures on density and support the incorporation of additional landscaping and green infrastructure at Land North of Ridware Road. Land off Wade Lane is defined with existing tall hedgerows and sensitive design would involve the continuation of linear development along the west of Wade Lane. However, the site is unlikely to support any substantial new landscaping to the west, which is likely to result in development being more prominent in the landscape and from key views towards Hill Ridware from the west. The site is also adjacent to several Tree Preservation Orders (TPOs) and development is likely to have some visual impact.

#### Transportation and movement

	Option 1: Land North of Ridware Road	Option 2: Option 1 and Land off Wade Lane	Option 3: Land North of Rake End
Significant effect?	No	No	No
Rank	1	2	2

- 4.45 All options are peripherally located, and the scale of growth is likely to lead to a minor increase in vehicle use in the area. However, this is not considered likely to lead to significant effects in relation to the local road network or highway capacity given the relatively low level of growth.
- 4.46 Option 1 supports new housing and a convenience store in a more sustainable location with respect to distance to local services and facilities and bus stops. The site further benefits from an existing PRoW along the western boundary and provides opportunities to introduce new footpaths and cycle routes between Hill Ridware and the playing fields to the north east of the site, and to new housing and convenience store. This should increase opportunities for active travel and for combined trips between the proposed convenience store and other local facilities such as the primary school. A convenience store at this location would also be better accessible to communities in Mavesyn Ridware and Pipe Ridware.
- 4.47 Land off Wade Lane is located to the west of Hill Ridware and thus less sustainably located than Option 1 and has limited opportunities to improve

- pedestrian and cycle movement. However, the site falls within a walkable distance to local services and facilities, although a greater reliance on vehicle use is likely at this location compared to Option 1. Distributing growth between two sites could also undermine viability for a potential new convenience store.
- 4.48 Option 3 is located to the north of Hill Ridware, and whilst the village and its services and facilities are within a walkable distance, this option is more likely to encourage vehicle use due to distance. The site is also not currently served by a footpath, and the footpath to the village centre from the north is not a continuous footpath, which is further likely to discourage walking. However, the site does fall in close proximity to bus stops and a convenience store at this location would be better accessible to communities in Blithbury.

#### Summary of assessment findings

4.49 **Table 4.2** below sets out where significant effects are predicted and summarises the rankings of the options in terms of their relative performance for each SEA theme.

Table 4.2 Summary of assessment findings by SEA theme

SEA theme		Option 1: Land North of Ridware Road	Option 2: Option 1 and Land off Wade Lane	Option 3: Land North of Rake End
Biodiversity	Significant effect?	No	No	No
	Rank	1	1	1
Climate change and flood risk	Significant effect?	No	No	No
	Rank	1	2	2
Community wellbeing	Significant effect?	Yes - positive	Yes - positive	Yes - positive
	Rank	1	2	2
Historic environment	Significant effect?	No	No	No
	Rank	1	1	1
Land, soil and water resources	Significant effect?	No	No	No
	Rank	2	2	1
Landscape	Significant effect?	Yes - uncertain negative	Yes - minor negative	Yes - minor negative
	Rank	3	1	2
Transportation and movement	Significant effect?	No	No	No
	Rank	1	2	2
Water resources and quality	Significant effect?	No	No	No
	Rank	1	1	2

- 4.50 Overall, all options are likely to have significant positive effects in relation to community wellbeing and negative effects on landscape. All options are also likely to have similar effects under other SEA themes.
- 4.51 Options 1 and 2 involve a site which includes land at risk of fluvial flooding. However, development can likely be accommodated on land to the south which falls within Flood Zone 1 and falls outside areas at risk of surface water flooding. The flood risk area also falls within an area of reduction in risk of flooding from rivers and sea due to defences. Furthermore, it is considered that the provisions of the NPPF and local policy will help guide development away from flood risk areas and ensure that appropriate mitigation measures are implemented.

#### Establishing the preferred approach

- 4.52 The MRNP Steering Group seek to allocate Land North of Ridware Road (Option 1). The preferred approach has been informed by the various surveys and evidence base documents prepared to support the MRNP (to date), responses from community consultation events, and the findings of the site assessment and SEA.
- 4.53 The MRNP Steering Group's reasons for developing the preferred approach considering the assessment are identified below:

The site has no significant constraints that would preclude development and local assessment has determined that it scores well compared to alternative site options. The site would provide greatest local community benefits, including:

- 1. Improving pedestrian connections between Hill Ridware and the existing playing field on School Lane.
- 2. Frontage to B5014 providing most viable option to deliver a small convenience store to serve the parish.
- 3. Delivery of substantial new multi-functional green space and opportunities for Biodiversity Net Gain.
- 4. Enhancing the existing PRoW between Uttoxeter Road and School Lane.
- 5. Maximising the delivery of affordable housing delivery through identification of a single allocation.

## 5. Appraisal of the Regulation 14 version of the Neighbourhood Plan

#### Introduction

- 5.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the current Regulation 14 draft version of the MRNP. This chapter presents:
  - An appraisal of the current version of the MRNP under the SEA theme headings; and
  - The overall conclusions at this current stage and recommendations for the next stage of plan-making.

#### Mavesyn Ridware Neighbourhood Plan policies

5.2 The MRNP contains 12 policies to guide development in the neighbourhood area. These are set out in **Table 5.1** below.

Table 5.1 Mavesyn Ridware neighbourhood plan policies

Policy Reference	Policy Name	
MR01	Residential Development	
MR02	Land East of Hill Ridware	
MR03	Employment	
MR04	Blithbury Redevelopment	
MR05	Sustainable Design	
MR06	Heritage and Character	
MR07	Landscape and Nature	
MR08	Local Green Space	
MR09	Local Facilities	
MR10	Local Energy Generation	
MR11	Movement and Active Travel	
MR12	Burial Ground	

#### Approach to this appraisal

5.3 The appraisal identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping (see **Table 3.2**) as a methodological framework. The appraisal is structured under each of the SEA objectives.

- 5.4 Account is taken of the criteria presented within Schedule 1 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential for the neighbourhood plan to impact an aspect of the baseline when implemented alongside other plans, programmes, and projects. These effect 'characteristics' are described within the assessment as appropriate.
- 5.5 Every effort is made to predict effects accurately; however, this is inherently challenging given the understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Therefore, there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim of striking a balance between comprehensiveness and conciseness). In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

#### **Biodiversity and Geodiversity**

- 5.6 There are no internationally designated sites within or in close proximity to the neighbourhood area and there are no nationally designated sites within the neighbourhood boundary. However, the area does include areas of priority habitat including ancient woodland and there is also potential for development to cause harm to the Cannock Chase SAC through increased recreational pressures and poorer air quality.
- 5.7 The proposed site allocations at Blithbury and Land North of Ridware Road do not intersect with any biodiversity or geodiversity designations and are not known to include any priority habitats. Despite this, the Blithbury site is adjacent to an area of Deciduous Woodland and Traditional Orchards. MRNP Policy MR04 (Blithbury Redevelopment) seeks to protect these habitats by requiring the design and layout of development to 'include the retention of mature trees in and around the site'. However, as the site has planning permission, any potential effects of the plan from development at Blithbury are uncertain.
- 5.8 Land North of Ridware Road is bounded by mature trees and established hedgerow, with some potential to be supporting species such as nesting birds, although in the absence of a detailed ecological assessment it is unknown if any species are present on site. MRNP Policy MR02 (Land East of Hill Ridware) seeks to protect existing habitats by supporting the retention of existing landscape features including hedgerows and should help secure improvements through new green infrastructure, sustainable drainage systems, landscaping and trees. This should support new habitat creation and support ecological connectivity across the site and to other habitats in the countryside. However, the policy does not define appropriate levels of housing density and without a detailed flood risk assessment, it is unclear if the proposed housing and retail space can be accommodated alongside ancillary infrastructure without undermining opportunities to maximise onsite biodiversity net gain and green infrastructure (outside of flood risk areas).

<sup>&</sup>lt;sup>14</sup> Environmental Assessment of Plans and Programmes Regulations 2004.

- 5.9 MRNP Policy MR07 (Landscape and Nature) seeks to avoid impacts on biodiversity by requiring development to avoid negative impacts on habitats, and thus supporting the preservation of existing habitats. Where an impact cannot be avoided, the policy requires it to be minimised and compensated for whilst taking opportunities to restore damaged and lost habitats. The policy further applies a similar approach towards trees and hedgerows, by requiring them to be incorporated into the design and layout of development, and where not possible be replaced with a 'similar level of amenity and environmental value'. As development proposals in rural areas are often likely to result in some loss of trees and hedgerows for essential purposes such as access, such measures should help sustain high quality replacement of habitats, although opportunities to achieve a biodiversity uplift from habitat replacement could be made explicit.
- 5.10 The neighbourhood plan seeks to protect and enhance the ecological value of the River Trent, its tributaries and flanking species grassland, by requiring development to not cause harm and take opportunities to enhance these biodiversity features with 'consideration of amenity, accessibility, biodiversity, habitat value, and landscape character' (MRNP Policy MR07).
- 5.11 Improvements in biodiversity are likely through measures set out in MRNP Policy MR05 (Sustainable Design), which requires green infrastructure to form an integral part of the design and layout of development. This includes the use of native species or other species of high environmental value, incorporation of gardens and street trees and sustainable drainage systems. This should help safeguard existing and provide new suitable ecological-rich habitats for local wildlife.
- 5.12 Policy MR08 (Local Green Space) identifies designated local green spaces across Mavesyn Ridware parish, where the green spaces will be protected from development. This will benefit biodiversity as many green spaces provide a habitat for wildlife or form part of an ecological corridor. Similarly, MRNP Policy MR07 seeks to protect woodland areas from significant adverse impacts from development.
- 5.13 As considered above, the MRNP sets out a series of measures to protect and enhance biodiversity features and designations. However, cumulatively, the policies do not significantly deviate from the baseline protection already afforded in the neighbourhood area through statutory measures and national and local planning policy. Opportunities to provide locally specific detail to secure biodiversity improvements such as on-site biodiversity net gain are missed. Equally, the scale and location of proposed growth and the mitigation measures set out in policy should likely avoid any significant effects. Overall, neutral effects are predicted.

#### Climate Change and Flood Risk

5.14 In the context of a declared climate and ecological emergency, the MRNP can provide planning support for the transition to a low carbon future and increased resilience to future climatic changes.

- 5.15 In terms of climate change mitigation, the proposed housing and retail space will increase greenhouse gas emissions linked to the construction phase, increase in the built footprint of Hill Ridware, local population growth and additional traffic flows. Additional traffic is likely due to the limited provision of employment, community services and facilities in the neighbourhood area, including but not limited to: health facilities, secondary education, leisure facilities and convenience retail. Given the scale of growth proposed (likely up to 33 homes and convenience store), and the likelihood of improvements to construction phase mitigation, energy efficiency and the adoption of new technologies (including increase in electric car usage), this is not considered to lead to significant effects in relation to climate change mitigation. It should also be borne in mind that the delivery of housing is a national priority, and therefore the delivery of housing per se should not be attributed to negative effects on climate change as a result of local and neighbourhood plans.
- 5.16 To a lesser extent, the redevelopment of the Blithbury site for residential institutions, education or other community facilities would also result in additional traffic and potential greenhouse gas emissions. Although, as the site has existing planning permission, these effects form part of the current baseline.
- 5.17 The provisions in MRNP Policy MR05 provide indirect support for climate change mitigation, particularly through the policy encouragement for high levels of sustainability in design, including for development to incorporate 'positive design and landscape features to reduce carbon use and support biodiversity'. The policy further supports the use of recycled materials and materials from sustainable sources which should reduce embodied carbon. The policy also encourages green infrastructure with local native species, the incorporation of gardens, street trees and sustainable drainage systems. This should support mitigation over the long term.
- 5.18 Policy MR10 supports local energy generation. However, the policy broadly aligns with Local Plan Policy SC2 and does not set out additional detail as to the nature of schemes (including a requirement for low carbon schemes) and locations where energy generation will be supported, and thus is not likely to alter the existing baseline.
- 5.19 The policy framework seeks to minimise both embodied and operational emissions by supporting the use of sustainable materials and renewable energy and encouraging high quality design. Whilst an increase in greenhouse gas emissions is inevitable as a result of the site allocations, development is necessary to support local housing and other community needs. Overall, no significant deviations from the baseline are considered likely, with many climate mitigation and resilience measures being driven largely at the regional or national scale. On this basis, broadly **neutral effects** are concluded in relation to climate change mitigation.

5.20 In regard to flood risk, the residential and convenience retail site allocation to the east of Hill Ridware partially falls within Flood Zones 2 and 3. MRNP Policy MR02 requires development to be accommodated on land outside of areas identified to be at risk of flooding, with areas at risk to be used for green open space. The policy further seeks the implementation of sustainable drainage systems and natural drainage. The policy measures alongside the protection afforded in national and local planning policy should help secure adequate mitigation to safeguard against potential exacerbated flood risk from development. However, in the absence of a detailed proposal and accompanying flood risk assessment, uncertain minor negative effects are predicted.

#### **Community Wellbeing**

- 5.21 At the strategic level, the Local Plan does not set out an unmet housing need for the neighbourhood area. However, a need for between 19 and 33 homes and for rented dwellings and affordable home ownership dwellings is identified in the HNA. The MRNP seeks to address this need by allocating a site (Land East of Hill Ridware) for up to 33 homes, which should provide housing choice and new affordable housing provision in an area of need. Given that this would exceed the objectively assessed housing needs for the area in the Local Plan, positive effects are predicted. Although, there is some uncertainty, as the MRNP does not specify an exact housing figure and does not explore into detail the number of homes and density that can be accommodated on a site with areas of known fluvial flood risk.
- 5.22 MRNP Policy MR01 (Residential Development) further supports infill housing in Hill Ridware and conversion of existing buildings throughout the parish. This should support windfall development in the long-term, but the scale of effects are predicted to be minor, given that the majority of housing need for the plan period is to be delivered on the site allocation. Furthermore, limiting support for infill development to Hill Ridware may undermine speculative infill development schemes in Mavesyn Ridware and Pipe Ridware to address a specific need in these areas, although these locations are broadly considered unsuitable for growth due to poor infrastructure provision.
- 5.23 In terms of the delivery of a mix of housing, MRNP Policy MR01 requires the mix of housing types, sizes and tenures to demonstrate 'regard for the latest evidence of housing need'. This should help towards the local delivery of new housing that reflects local need and contributes towards widening of choice. However, the effectiveness of the policy is somewhat limited as it does not seek for development proposals to provide up to date evidence to reflect the changing needs of the local population, and thus in the longer term, in the absence of up to date housing needs evidence, the types, sizes and tenures of new housing in the neighbourhood area may not most effectively meet local needs. Furthermore, the HNA identifies a need to maximise affordable housing delivery throughout the plan period, which is not reflected in the policy.

- 5.24 The MRNP sets out a number of measures to ensure it maintains Mavesyn Ridware parish as an active and thriving place to live and to ensure existing and new communities have good access to local services and facilities. Policy MR02 allocates for convenience retail floorspace in a highly accessible location off Ridware Road. This will provide existing and new residents in Hill Ridware and other settlements nearby with access to a convenience store, reducing the need to travel further afield for essential groceries and associated services. MRNP Policies MR08 and MR09 proactively seek to protect and enhance the community offer, including through protecting community facilities and green spaces. Policy MR09 further supports new community facilities in Hill Ridware and facilities which require open land outside of Hill Ridware. This could potentially undermine new community provision outside of Hill Ridware such as a community hall, although with very limited growth planned at these locations, this is highly unlikely. MRNP Policy MR12 (Burial Ground) allocates a site to extend the current burial grounds, which should help secure local provision for burial in the long term.
- 5.25 The MRNP also sets out measures to support local employment. This includes MRNP Policy MR03 which supports new employment in Hill Ridware and the rural diversification of the economy throughout, providing that there are no adverse effects on residential amenity. This also includes MRNP Policy MR09 which requires high speed broadband infrastructure on site and within the curtilage of each dwelling, ensuring new communities are well connected and supporting remote working and entrepreneurism. Such policies are likely to deliver long-term positive effects by supporting sustainable new communities through new employment opportunities and improved access to services and facilities.
- 5.26 Healthy and active lifestyles are encouraged through the MRNP through Policies MR05 and MR11, which support walking and cycling and encourage social and recreational activities and play. MRNP Policies MR03, MR09 and MR10 seeks to protect residential amenity from new employment, community facilities and from local energy generation schemes, which should help protect the wellbeing of residents. MRNP Policy MR01 requires affordable housing to be 'tenure blind' which should support the provision of higher quality affordable housing and help foster equality and diversity in community.
- 5.27 MRNP Policy MR04 supports new residential institutions, education or community facilities at the Blithbury site. This broadly aligns with the existing planning permission for the site for a residential educational facility for young people. However, this is positive in principle, as the policy should safeguard such uses for the site in a case where the planning permission is not implemented. The policy further supports residential development (Class C3) on the Blithbury site in exceptional circumstances where the scheme includes 'significant measures to offset the unsustainable location' and includes environmental improvements. The policy does not address how the unsustainable location could be made sustainable and considering the scale and nature of any residential development likely to come forward, residential development at this location could have a negative effect on the wellbeing of future residents due to poor access to local services and facilities, limited opportunities for recreation and its isolated location from other communities. Therefore, residential development (Class C3) should be discouraged.

- 5.28 MRNP Policy MR02 supports residential development, convenience retail floorspace and open space at Land East of Hill Ridware, with built development proposed in areas outside of fluvial flood risk and the open space covering an area Flood Zones 2 and 3. Whilst provisions in the NPPF and national policy will help guide development away from flood risk areas and ensure that appropriate mitigation measures are implemented to safeguard new and existing residents, there is potential for flood events to have an adverse effect on resident amenity in the long term. Close proximity to areas at risk of fluvial flood risk could also increase insurance and other costs for new residents, increasing economic disparities. The likelihood of flooding onsite is yet to be fully established and subject to detailed assessments, but the risk of flooding in the northern part of the site could limit the potential use of this area for recreational purposes.
- 5.29 Overall, the MRNP performs well under the community wellbeing objective. In particular, addressing local housing needs and providing new and safeguarding existing access to community services, facilities and green space will derive positive effects. Equally, site allocations and supporting policies include some measures which could derive negative effects. However, the scale of both positive and negative effects are not considered to be significant, and overall a minor positive effect is predicted as the positives outweigh any potential negatives (which ought to be possible to mitigate).

#### **Historic Environment**

- 5.30 The neighbourhood area has a rich historic environment, recognised through the diversity of features and areas which are nationally and locally designated for their heritage interest. This is reflected by MRNP policies which have a focus on conserving and protecting the significance of buildings, structures and features of architectural or historic interest and their settings. MRNP Policy MR06 (Heritage and Character) requires development to 'complement the historic and rural character of the village in design, materials and finishes, adding to the architectural quality and diversity of the village'. The policy further requires development to 'preserve and enhance the character of the Mavesyn Ridware Conservation area', taking account of low density townscape, green infrastructure, and the group value of listed buildings. This should help deliver high quality and sensitive design within the conservation area and throughout the parish.
- 5.31 MRNP Policy MR06 seeks to preserve or enhance and avoid harm to listed buildings and their settings. This broadly aligns with the protection afforded to listed buildings in the NPPF and Local Plan, although some positive effects are derived from the detailed included for the listed High Bridge and Ridware Hall. The policy also identifies eight non-designated heritage assets and seeks to preserve and enhance them and their setting. Identifying and protecting buildings of local heritage interest should make positive contributions towards conserving the historic environment and local features of historic importance. However, opportunities for more significant positive effects are missed as the policy does not set a clear presumption in favour of their protection or require substantial public benefit to offset any harm or loss of the heritage asset.

- 5.32 MRNP Policy MR01 requires residential development to demonstrate high standards of design to create a locally distinctive sense of place. Similarly, MRNP Policy MR03 safeguards historic development from adverse impacts from employment development and requires employment facilities to have high standards of design. In addition, MRNP Policies MR02, MR05 and MR09 set out design standards for the site allocation at Land East of Hill Ridware and all development across the neighbourhood area. These policies positively respond to protecting the distinct character of heritage assets and the built environment of the parish.
- 5.33 Overall, the MRNP policies take a proactive approach in conserving the distinctive character and heritage interests of Mavesyn Ridware parish. This is recognised through its focus on safeguarding protected features (both designated and non-designated) and their settings and ensuring that development respects the character of the existing townscape and surrounding countryside. The protection afforded to historic features should help conserve their historic importance in the long-term. However, this does not deviate significantly from the statutory protection already afforded to these designated and non-designated assets and that provided in the Local Plan. Therefore, the MRNP is considered to have a moderate positive effect on this objective.

#### Land, Soil, and Water Resources

- 5.34 In terms of the location of the best and most versatile agricultural land, a detailed classification has not been undertaken for most of the neighbourhood area including land adjacent to Hill Ridware. Therefore, there is a need to rely on the nationally available 'Provisional Agricultural Land Quality' national dataset. The Provisional Agricultural Land Quality dataset shows that the land immediately surrounding settlements consists of Grade 2 and Grade 3 agricultural land, however, the data does not differentiate as to whether this is Grade 3a (e.g. the best and most versatile) or lower quality 3b land. The Grade 2 agricultural land includes land to the south and east of Hill Ridware, and at Mavesyn Ridware and Pipe Ridware. The land immediately surrounding settlements are susceptible to loss in future development.
- 5.35 The Local Plan Policy 6 affords protection to agricultural land resources by limiting residential development in rural areas to infill development within defined village settlement boundaries. The Local Plan further defines a tight settlement boundary around the built area of Hill Ridware. The MRNP seeks to extend the settlement boundary to include the developable area of the site allocation. The continuation of the Local Plan approach of a tight settlement boundary will help to ensure the long term preservation and retention of agricultural land resources around Hill Ridware, although positive effects are not realised because in the absence of the MRNP, protection is afforded by the Local Plan.

- 5.36 MRNP Policy MR07 (Landscape and Nature) seeks to provide additional protection for agricultural land resources by requiring development except the allocated site to 'not involve the loss of the best and most versatile agricultural land'. In the context of the Local Plan, the effects of this policy are limited to uses such as sports and recreational fields, open spaces and golf courses, which may be acceptable outside settlement boundaries. With such uses likely to support restoration to high quality agricultural land after use. The policy is likely to derive positive effects, although effects are not predicted to be significant.
- 5.37 MRNP Policy MR10 (Local Energy Generation) further supports low energy generation schemes providing there is no significant adverse effect on the best and most versatile agricultural land. This should support the preservation of high quality land resources and encourage energy schemes on lower quality land or the potential continued agricultural use whilst energy schemes are implemented.
- 5.38 The proposed site allocation consists of Grade 3a agricultural land. However, given the scale of the site and loss of resource, no significant effects are predicted.
- 5.39 The scale of housing proposed is unlikely to have any significant impacts at the catchment level to cause pressure on water resources. There is potential for development to result in pollution in surface water run-off or as a result of flooding, which could adversely affect water quality. However, such potential effects are balanced because of potential improvements to water quality from the change of use of the site and thus removal of agriculture related pollutants in run-off. MRNP Policy MR02 further requires the development of the site to include green infrastructure and sustainable drainage systems which should help preserve and potentially enhance water quality.
- 5.40 MRNP Policy MR05 (Sustainable Design) requires all development to incorporate green infrastructure including the use of native species of high environmental value, trees and incorporate sustainable drainage systems. This broadly aligned with the policy framework established by national and local planning policy. However, the use of native species of high environmental value should provide more robust and resilient green infrastructure potentially enhancing the effectiveness of sustainable drainage systems.
- 5.41 Overall, the small scale of growth proposed in the MRNP will result in a minor loss of agricultural land resources. Otherwise, the mitigation measures proposed within policy should support the preservation of land, soil and water resources. As the MRNP does not propose any significant deviation from the baseline, broadly **neutral effects** are predicted on this SEA objective.

#### Landscape

- 5.42 Whilst Mavesyn Ridware parish does not fall within or in close proximity to any statutory national landscape designations, the area does fall within the Needwood and South Derbyshire Claylands (68) National Character Area. At a localised scale, the neighbourhood area falls across three landscape types ('ancient settled farmlands', 'lowland village farmlands' and 'river meadowlands') for which management guidelines have been set out by Lichfield District Council. 15 The landscape character across the neighbourhood area is known to consist of fields with arable and pastoral farming somewhat enclosed with large hedged or tree lined boundaries. The MRNP seeks to protect these landscape features through Policies MR06 and MR07, which support a low density townscape with the incorporation of grass verges and landscaping and the preservation (and where not possible, replacement) of hedges and trees. MRNP Policy MR07 further seeks to avoid significant adverse impacts on historic and rural landscape character, preserve woodland and protect and enhance the landscape character along River Trent and its tributaries.
- 5.43 The protection of local landscape character and appearance is further supported through policies that set out measures that directly or indirectly protect and seek to enhance landscape character and sensitivity. MRNP Policy MR05 sets out design standards and for development to incorporate green infrastructure including gardens and street trees. This should help reduce some impacts on landscape and townscape character through supporting sensitive design.
- 5.44 MRNP Policy MR10 supports local energy generation schemes providing that there are no significant adverse impacts on the natural and historic environment and are 'located, designed and, where necessary, include screening and landscaping to minimise any adverse visual impacts'. This should help minimise visual impacts and effects on landscape character from schemes that include infrastructure such as solar photovoltaic panels or small-scale wind turbines.
- 5.45 The intrinsic qualities of the local landscape are afforded a level of protection through the MRNP policies which recognise the importance of green and open spaces both within and outside the built area. Policy MR08 designates eight sites as local green space and seeks to restrict development that would result in 'harm to the open and green character, amenity, safety or accessibility' of these spaces. These designations include features which contribute positively towards maintaining the rural built character of Mavesyn Ridware and Hill Ridware and are intrinsic to the landscape character. In this context, MRNP Policies MR06 and MR07 protect the 'open farmland setting' of Mavesyn Ridware and requires development to 'maintain the open landscape setting of Mavesyn Ridware and its separation from other settlements'.

<sup>&</sup>lt;sup>15</sup> Lichfield District Council (2019) <u>Update of Landscape Character Assessment</u>

- 5.46 Effects of development on the landscape character and setting are likely to be further managed through the implementation of MRNP Policy MR01, which seeks to limit residential development to site allocations, within Hill Ridware and outside of Hill Ridware to the redevelopment of existing buildings. MRNP Policy MR09 further only supports community facilities requiring open space outside of Hill Ridware, preserving the openness of surrounding countryside by locating facilities within built up areas. These policies should afford additional protection to the countryside which should help preserve existing village character and the openness of the surrounding landscape.
- 5.47 Regarding site allocations, MRNP Policy MR02 allocates 'Land to the East of Hill Ridware' for up to 33 homes and convenience retail floorspace. The site benefits from existing landscape features to the east which should provide a natural edge to the development which could be strengthened to reduce landscape impact from development. The policy further requires the layout, landscape design and boundary treatment to create a soft transition between built development and the surrounding landscape. However, with the northern part of the site falling within areas of fluvial flood risk, development would likely need to be accommodated in a linear fashion along Ridware Road. Without a detailed flood risk assessment and with the site being predominantly flat, it is unclear if the proposed sensitive development for flood risk areas including housing can be accommodated without requiring mitigation measures such as the reprofiling of land or land raising, which can have adverse effects on local landscape character. Furthermore, the full extent of land at risk of fluvial flooding is currently unknown and there is potential for detailed assessment to identify a smaller developable area, which could require a higher density of development to deliver a viable scheme. The potential intensification of development on Flood Zone 1 land could result in a linear extension to Hill Ridware and appear as an intrusion of built development into open countryside.
- 5.48 It is considered that the MRNP provides a good framework for the protection and enhancement of the local landscape. However, the proposed allocation of 'Land East of Hill Ridware' has potential to have significant adverse effects on landscape character that need to be explored and addressed at planning application stage. Overall, an **uncertain negative effect** is predicted.

#### **Transportation and Movement**

- 5.49 It is noted that in Hill Ridware at busy times, movement, parking, and pinch point congestion are a continuing challenge. Limited parking associated with Henry Chadwick Primary School exacerbates congestion issues in the village. Mavesyn Ridware and Pipe Ridware are served by narrow roads which are unable to support two-way vehicle movement at most points.
- 5.50 In the absence of strategic transport interventions, growth in the neighbourhood area is likely to exacerbate these issues, and continued reliance on the private vehicle is considered likely to prevail over the neighbourhood plan period. However, the addition of up to 33 homes and a convenience store (as proposed under MRNP Policy MR02) is not considered likely to lead to significant effects in respect of the baseline. Furthermore, the policy sets out mitigation measures which include facilitating active travel including pedestrian and cycle infrastructure between the site, sport fields to the north east and the village and improvements to the PRoW along the western boundary of the site.

- 5.51 With regard to the proposed convenience retail space, whilst a new local convenience store is likely to increase local journeys, this will reduce the need for travel outside the neighbourhood area and last mile deliveries. Furthermore, the proposed site allocation is located adjacent to the built area of Hill Ridware and in a walkable proximity to community services and facilities in the village and for existing residents to access using sustainable means, reducing some potential pressures on the private car.
- 5.52 Active and sustainable travel is supported by a number of policies which support enhancements to pedestrian and cycle connectivity and infrastructure provision. In particular, MRNP Policy MR11 (Movement and Active Travel) requires development to be designed to support active travel and maximise pedestrian and cycle permeability including links to surrounding paths and community facilities. Similarly, requirements in MRNP Policy MR05 for development to create safe, convenient and attractive environments for pedestrians and measures in the Plan to enhance the amenity, accessibility and safety of footpaths and enhancements to PRoWs, should facilitate and encourage walking, recreation and active travel. Cycling is further encouraged through requirements in MRNP Policy MR01 for all new homes to have secure and covered storage for cycles. Whilst these policies do not deviate substantially from national and local planning policy, the neighbourhood area specific detail and additional requirements are likely to generate some positive effects.
- 5.53 A number of policies indirectly support more sustainable transport and reduced need for travel. In this regard, MRNP Policy MR09 (Local Facilities) requires new development including the curtilage of each dwelling to be supported with high-speed broadband infrastructure, which should facilitate home-working and reduce the need to travel into work. MRNP Policy MR03 further supports the diversification of the rural economy and high-speed broadband in new employment space. Supporting local employment growth should reduce the need to travel.
- 5.54 Whilst the MRNP adds some additional detail in respect of transport measures and could reduce longer journeys by introducing new convenience retail in the parish, the principle of sustainable connections, improvements to infrastructure and walkable neighbourhoods are already established in the Local Plan, and hence, only **minor positive effects** are predicted in this respect.

#### Conclusions at this stage

5.55 Table 5.2 summarises the overall effects of the policies within the draft MRNP for each SEA topic. It is important to differentiate between significant effects, which are predicted to lead to changes in the baseline position, and those effects that are broadly positive or negative, but are less likely to lead to substantial changes.

5.56 Overall, neutral or positive effects are predicted across each SEA topic, with the exceptions being the 'Flood Risk' and 'Landscape' objectives, where uncertain negative effects are predicted relating to the allocation of 'Land East of Hill Ridware' and potential harm from fluvial flood risk. The effects on the Landscape objective are significant due to the potential for harm to landscape character. Whereas, effects are not significant under the Flood Risk objective, as existing national and local planning policy should safeguard again any potential increase in flood risk and its implication on existing and future residents.

Table 5.2: Summary of overall effects for each SEA Topic.

SEA Topic	Overall Effects
Biodiversity and Geodiversity	Neutral effect
Climate Change	Neutral effect
Flood Risk	Uncertain minor negative effect
Community Wellbeing	Minor positive effect
Historic Environment	Moderate positive effect
Land, Soil, and Water Resources	Neutral effect
Landscape	Uncertain negative effect
Transportation and Movement	Minor positive effect

#### Recommendations

- 5.57 A number of recommendations have been identified to enhance the positive effects of the draft MRNP and mitigate any negatives. These are summarised below:
  - Policy MR02 proposes housing and convenience retail floorspace (i.e. sensitive uses) on a site allocation which partially falls within Flood Zones 2 and 3. The MRNP evidence base does not include flood risk assessments that can help understand the extent of land at risk of fluvial and surface water flooding. The evidence base also does not include any masterplanning or design standards, which can help demonstrate how development can be delivered on site without having adverse effects on exacerbating flood risk or requiring major changes to land levels. The policy could be supported with adequate evidence and / or require flood risk assessments to be completed to avoid the uncertain negative effects predicted under the 'Climate Change and Flood Risk' and 'Landscape' objectives.
  - Policy MR04 supports self-build homes in exceptional circumstances on the Blithbury site, where the scheme includes 'significant measures to offset the unsustainable location'. The exceptional circumstances relate to addressing a specific need and environmental improvements. This does not address the negative impacts on the wellbeing of new residents by locating housing distant to other communities, facilities and services. Therefore, it is recommended that C3 residential uses are discouraged, unless feasible improvements to address the unsustainable location can be delivered.

- Policy MR07 sets out that 'with the exception of the allocated site, development should not involve the loss of the best and most versatile agricultural land'. Whilst this should help protect important agricultural land resources, the policy is very restrictive and could undermine wider positive effects. It is recommended that a threshold-based approach is adopted, where any harm or loss of agricultural land resource has to be offset by substantial community and environmental benefits.
- Policy MR07 could also be improved by requiring replacement trees and hedgerows to be of a similar level 'or greater'. This should help support biodiversity net gain and landscape objectives.

#### 6. What are the next steps?

6.1 This part of the report explains the next steps that will be taken as part of planmaking and SEA.

#### Plan finalisation

- 6.2 This Environmental Report accompanies the MRNP for Regulation 14 consultation. Following consultation, any representations made will be considered by the Steering Group, and the MRNP and Environmental Report will be updated as necessary. The updated and final version of the Environmental Report will then accompany the MRNP for submission to the LPA, Lichfield District Council, for subsequent Independent Examination.
- 6.3 At Independent Examination, the MRNP will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with local planning policy.
- 6.4 If the Independent Examination is favourable, the MRNP will be subject to a referendum, organised by Lichfield District Council. If more than 50% of those who vote agree with the MRNP, then it will be 'made'. Once made, the MRNP will become part of the Development Plan for the parish.

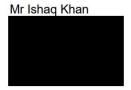
#### **Monitoring**

- 6.5 The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the MRNP to identify any unforeseen effects early and take remedial action as appropriate.
- 6.6 It is anticipated that monitoring of effects of the MRNP will be undertaken by Lichfield District Council as part of the process of preparing its Annual Monitoring Report (AMR).
- 6.7 The SEA has identified potential for uncertain significant negative effects on Landscape that require closer monitoring. It is suggested that the following issues be monitored:
  - Updates to landscape character assessments.
  - Planning applications for the site allocation at 'Land East of Hill Ridware'.
  - Flood risk assessments in and around Hill Ridware.

# **Appendix A - Scoping Consultation Responses**

#### **Historic England**





Our ref:

16 February 2024

Dear Mr Khan

#### MAVESYN RIDWARE NEIGHBOURHOOD PLAN - SEA SCOPING REPORT.

Thank you for your consultation and the invitation to comment on the SEA Scoping Document for the above Neighbourhood Plan and I can confirm that Historic England have no substantive concerns as to the contents of the document.

I hope this is helpful

Yours sincerely,



CC:





THE FOUNDRY 82 GRANVILLE STREET BIRMINGHAM B1 2LH

Telephone 0121 625 6888

HistoricEngland.org.uk

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

#### **Environment Agency**



Our ref:
Your ref:

07 March 2024

F.A.O: Ishaq Khan

Dear Ishaq

#### Mavesyn Ridware SEA Scoping Report

Date:

Thank you for your consultation on the above Neighbourhood Plan (NP) SEA Scoping Report, received by us on 26th January 2024.

It is important that the forthcoming NP offers robust confirmation that development is not impacted by flooding and that there is sufficient waste water infrastructure in place to accommodate growth for the duration of the plan period.

**Environmental Themes:** The themes presented appear to incorporate the 'SEA topics' suggested by Annex I(f) of the SEA Directive and appear reasonable to reflect the purpose of this report and its potential environmental effects. The themes include Air Quality, Biodiversity, Climate Change (including Flood Risk) and Land, Soil and Water Resources.

I have attached a copy of our pro-forma for reference and consideration for the Mavesyn Ridware NP. We have also produced Climate Change Guidance for our local area. This is attached for your consideration / reference.

The purpose of the guidance is to assist the preparation of the NP, including an appropriate evidence base. This includes consideration of some of the relevant environmental issues that should be included, including flood risk, water quality, water resources and includes latest Climate Change recommendations for flood risk. These are key issues you appear to cover in your scoping report.

We would advise utilising the pro-forma to check the environmental constraints. This will help collect evidence, identify challenges, inform policy and assist delivery of sustainable solutions.

**Biodiversity:** We understand that you have consulted Natural England (NE) for comments and as the lead on SSSI/SAC areas; they will offer you some advice on the options to protect and enhance such designations etc.

Environment Agency
Hafren House, Welshpool Road, Shelton, Shropshire, Shrewsbury, SY3 8BB.
Customer services line: 03708 506 506
www.gov.uk/environment-agency
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The SEA objectives and questions appear reasonable to help create, enhance and connect habitats, species and/or sites of biodiversity interest. We welcome reference to the Government's 25 Year Environment Plan and recognition of the embedding 'net gain' principles as part of the Environment Act 2021. It is noted that Lichfield District Council has a current policy requirement for 20% biodiversity net gain.

**Flood Risk:** In this instance, having checked the environmental constraints within the NP area, our main points below relates to fluvial flood risk (flooding from rivers and sea).

Based on our indicative Flood Map for Planning (Rivers and Sea), the NP area is shown to be predominantly located in Flood Zone 1, and therefore has a low fluvial flood risk potential. However, we note that parts of the Plan area, to the North (River Blythe) and South (River Trent) fall within Flood Zones 2 and 3, the medium and high risk zones respectively. We also note there are a number of smaller ordinary watercourses crossing the NP area.

Our Flood Map primarily shows flooding from Main Rivers, not ordinary watercourses, or un-modelled rivers, with a catchment of less than 3km². As such, with regard to any additional allocations, it should not be assumed that these ordinary watercourses do not have floodplains and there may be slightly more of the site affected by flood risk than is immediately expected just from reference to the Flood Zone Mapping.

The Scoping Report states that 'Lichfield District Council has confirmed that up to 33 new homes would be suitable for allocation under the Mavesyn Ridware Neighbourhood Plan'. If site allocations are subsequently considered in the NP then some assessment of flood risk associated with these unmodelled watercourses may be necessary as part of any supporting evidence base.

This is to confirm that the sites are developable, have safe occupation and that there will be no impact on third parties. We would also expect opportunities be sought for enhancement and/flood risk improvements.

It should be noted that the Flood Map provides an indication of 'fluvial' flood risk only. You are advised to discuss matters relating to surface water (pluvial) flooding with the Lichfield District Council as the Lead Local Flood Authority (LLFA).

With regards any housing allocations proposed within the NP, going forward we would only make substantive further comments if the Plan was seeking to allocate sites for development in Flood Zones 3 and/or 2, or as identified within any Strategic Flood Risk Assessment (SFRA).

Water Quality/Water Resources: The Environmental Bill (2020) policy statement states that the new bill aspires to secure long term, resilient water and wastewater services, making for a greener and more resilient country for the next generation within its 25 year environmental plan. Key elements to help reform the 25-year plan including trying to reform waterbodies to as close to their natural state.

With reference to the Water Framework Directive (WFD) we would expect Lichfield District Council to continue to help address WFD failures through its role as planner, issuing ordinary watercourse consents and as land manager. All watercourses in the Plan area (and UK) are duty bound to reach Good Ecological Status or Potential (GES/GEP) by 2027. It is essential that WFD is fully integrated into the Local Plan

Cont/d.. 2

process and that all future development helps to address the issues that currently prevent the watercourse from achieving GES/GEP. Similarly, at the NP level, we would highlight the need to protect, enhance and minimise the impact upon the water environment.

Furthermore, we do not offer detailed bespoke advice on policy but advise you ensure conformity with the Lichfield Local Plan Strategy and refer to our guidance. This might assist with your consideration of a local environmental enhancements or improvement policies that may be necessary.

I trust the above is of assistance at this time. Please can you also copy in any future correspondence to my team email address at <a href="westmidsplanning@environment-agency.gov.uk">westmidsplanning@environment-agency.gov.uk</a>

Yours faithfully

Mr.	
<b>Planning Speciali</b>	st
Direct e-mail	

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### **Appendix B - SEA Scoping Report**

See separate Scoping Report document

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