

Purton Neighbourhood Plan

**Strategic Environmental Assessment
Screening Report**

January 2018

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1 Introduction

- 1.1 This screening report is designed to determine whether or not the contents of the Purton Neighbourhood Plan (PNP) requires a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/EC¹ and associated Environmental Assessment of Plans and Programmes Regulations 2004. Wiltshire Council, as the 'Responsible Authority'² under the SEA Regulations, is responsible for undertaking this screening process of the neighbourhood plan; it will determine if the Plan is likely to have significant environmental effects, and hence whether SEA is required.
- 1.2 The purpose of the Purton Neighbourhood Plan (PNP) is to describe future land use within the Parish of Purton.
- 1.3 The legislative background set out below outlines the regulations that require the need for this screening exercise. Section 4, provides a screening assessment of the likely significant environmental effects of the PNP and determines the need, or not, for a full SEA.

2 Legislative Background

- 2.1 The basis for Strategic Environmental Assessments and Sustainability Appraisal legislation is European Directive 2001/42/EC and was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, or SEA Regulations.
- 2.2 The Planning and Compulsory Purchase Act 2004 required Local Authorities to produce Sustainability Appraisals (SA) for all local development documents to meet the requirement of the EU Directive on SEA. It is considered best practice to incorporate requirements of the SEA Directive into an SA, although there is no requirement for neighbourhood plans to include an SA.
- 2.3 The Localism Act 2011 requires neighbourhood plans to comply with EU legislation. The screening procedure outlined in this report meets the requirements of the SEA Directive and Regulations, as introduced in Section 1 of this document.
- 2.4 Regulation 5 of the SEA Regulations requires an environmental assessment of plans which:
 1. *Are prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use (Regulation 5, para. (2)(a), and which set the framework for future development consent of projects listed in Annex I or II to Council Directive 85/337/EEC (EIA Directive) on the assessment of the effects of certain public and private projects on the environment (Regulation 5, para. (2)(b);*

¹ European Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment"

² The organisation which adopts the neighbourhood plan (this is described in Wiltshire Council's guide *Neighbourhood planning – a guide for Wiltshire's parish and town councils* (June 2012) as 'makes the plan').

2. *In view of the likely effect on sites, have been determined to require an assessment pursuant to Article 6 or 7 of the Habitats Directive (92/43/EEC) (Regulation 5, para. (3));*
3. *Set the framework for future development consent of projects³ (Regulation 5, para. (4)(b)); and*
4. *Are determined to be likely to have significant environmental effects as determined under regulation 9(1) (Regulation 5, para. (4)(c).*

An environmental assessment need not be carried out for:

- a) *plans which determine the use of a small area⁴ at local level (Regulation 5, para. (6)(a); or*
- b) *plans which are a minor modification⁵ to a plan or programme (Regulation 5, para. (6)(b);*

unless it has been determined under regulation 9(1) that the plan is likely to have significant environmental effects.

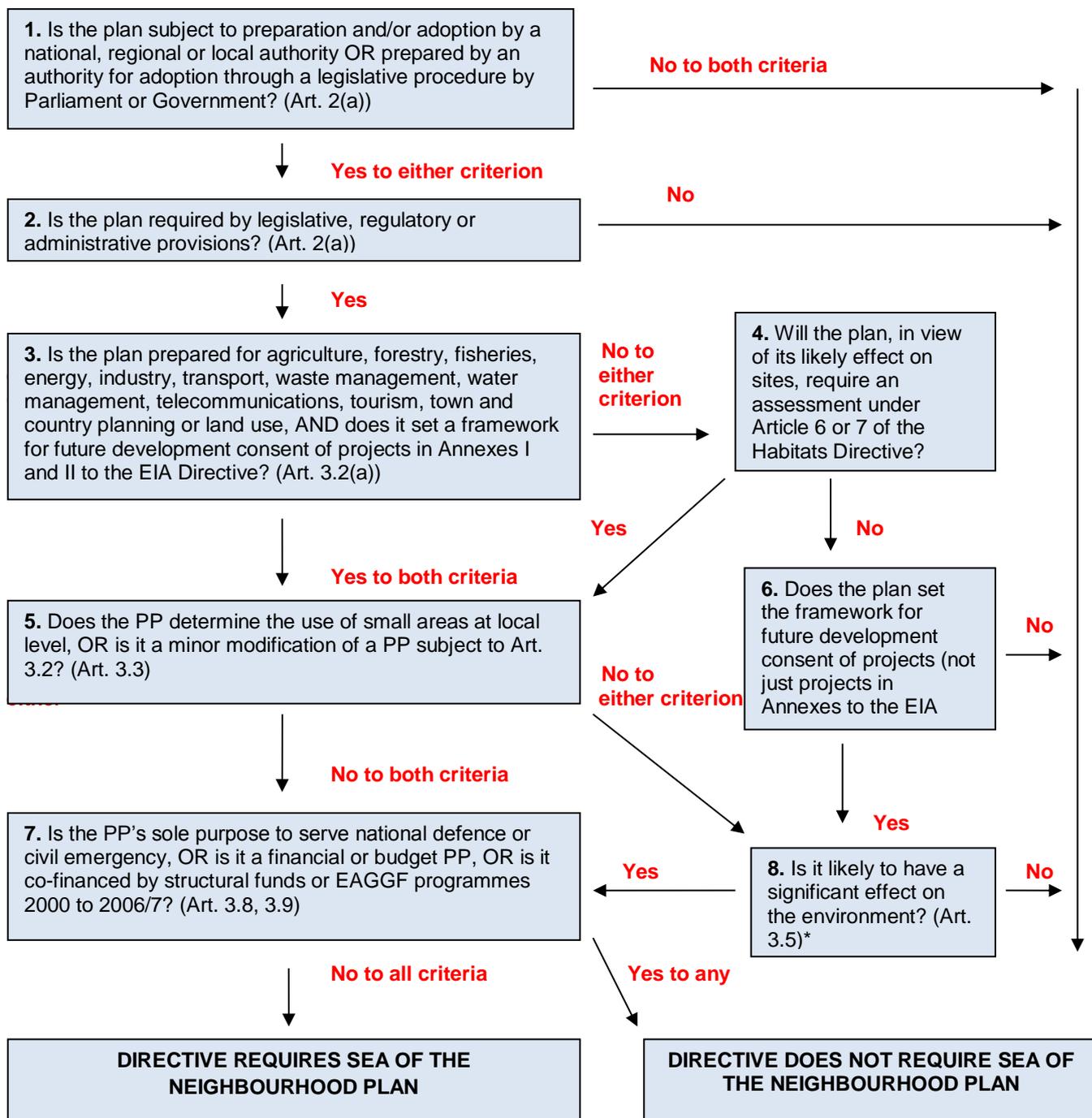
³ European Commission guidance states that plans and programmes which set the framework for future development consent of projects would normally contain 'criteria or conditions which guide the way a consenting authority decides an application for development consent'. Development consent is defined in the EIA Directive as "the decision of the competent authority or authorities which entitled the developer to proceed with the project" (Article 1(2) of the EIA Directive).

⁴ European Commission guidance suggests that plans which determine the use of small areas at local level might include "a building plan which, for a particular, limited area, outlines details of how buildings must be constructed, determining, for example, their height, width or design"

⁵ 'Minor modifications' should be considered in the context of the plan or programme which is being modified and of the likelihood of their having significant environmental effects. A modification may be of such small order that it is unlikely to have significant environmental effects.

2.5 The diagram⁶ below shows the SEA Directive’s field of application:

Application of the SEA Directive to neighbourhood plans



* Plans falling in this category (No.8) will be screened by Wiltshire Council to determine if they are likely to have significant environmental effects. This determination will be made on a case by case basis for neighbourhood plans coming forward in Wiltshire.

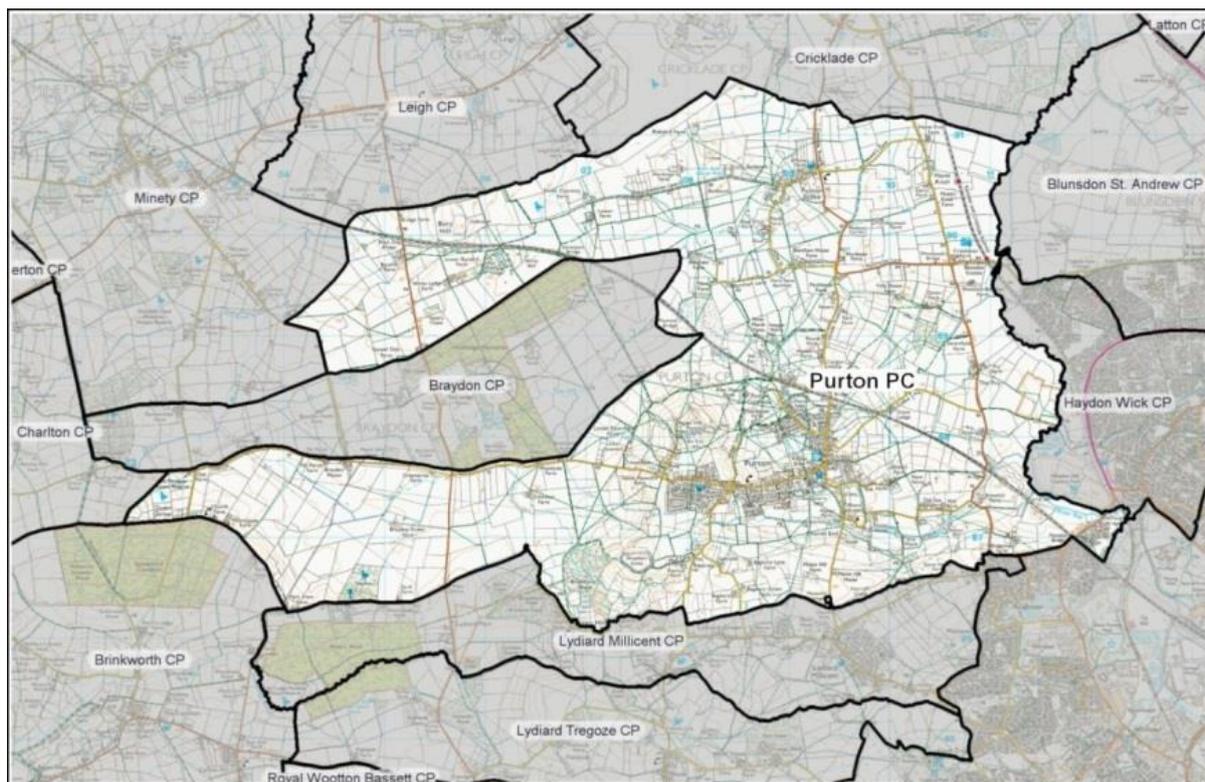
NB This diagram is intended as a guide to the criteria for application of the Directive to neighbourhood plans. It has no legal status.

⁶ Taken from *A Practical Guide to the Strategic Environmental Assessment Directive* (ODPM, 2005)

3 The Purton Neighbourhood Plan

Background

- 3.1 Purton Parish Council is currently preparing a neighbourhood plan under the provisions of the Localism Act 2011, and associated Regulations.
- 3.2 The parish of Purton is situated midway between the market towns of Cricklade to the north and Royal Wootton Bassett to the south and borders the rapidly expanding urban area of Swindon on its eastern side. Purton is part of the Royal Wootton Bassett and Cricklade Community Area which comprises twelve parishes. The parish comprises the villages of Purton and Purton Stoke and a number of small hamlets which include The Fox and Hayes Knoll. Purton is defined as a Large Village in the WCS whereas Purton Stoke is a Small Village.
- 3.3 During the autumn of 2011, Wiltshire Council obtained funding from the Government's "Front Runners" scheme to trial the neighbourhood planning process in four different geographical areas across the county. These included Malmesbury, Sherston, Warminster and the Royal Wootton Bassett and Cricklade Community Area. The Royal Wootton Bassett and Cricklade Community Area includes the twelve parishes of Braydon, Broad Town, Cricklade, Clyffe Pypard, Latton, Lydiard Millicent, Lydiard Tregoze, Lyneham and Bradenstoke, Marston Meysey, Purton, Tockenham, and Royal Wootton Bassett.
- 3.4 Some parishes within the community area declined to take part or, as with both Cricklade and Royal Wootton Bassett, withdrew from the arrangement at an early stage. The seven rural parishes which stayed in the arrangement formed the North Eastern Wiltshire Villages (NEW-V) Neighbourhood Area which was approved by Wiltshire Council in May 2013. Those parishes were Broad Town, Clyffe Pypard, Lydiard Millicent, Lydiard Tregoze, Lyneham and Bradenstoke, Purton and Tockenham. They have worked during the last three years to prepare their individual plans to be incorporated in the overall NEW-V Area Plan.
- 3.5 In January 2016 Purton Parish Council decided to take its draft neighbourhood plan forward, separately, so that it could be put in place for the benefit of the Parish by the end of 2016. Purton Parish Council has applied to Wiltshire Council for the designation of the Parish of Purton as a neighbourhood area and consultation commenced 26 June to 10 August 2016. Having considered the feedback received through the consultation, Wiltshire Council recommended that the proposed Purton Neighbourhood Area is coherent, consistent and appropriate in planning terms. The designation of Purton Neighbourhood Area was approved on 5 December 2016.
- 3.6 Further information on the neighbourhood plan can be found on the Purton Parish Council web site at <http://www.purtonparishcouncil.co.uk>.



Map showing the designated Purton Neighbourhood Area

Neighbourhood plan draft vision and objectives

3.7 The Purton Parish Neighbourhood Plan vision and objectives were informed by discussions and points raised during the extensive consultation that took place during 2013 and the recommendation from the Purton Housing Needs Survey January 2012 and the Purton Parish Plan 2014. These form the foundation of the Purton Neighbourhood Plan and bring together what the plan aims to achieve:

- To protect the distinct character and identity of the historic rural settlements of both Purton and Purton Stoke together with the hamlets of the Fox and Hayes Knoll within the plan area;
- To protect the beauty and intrinsic value of the surrounding countryside and resist the gradual and persistent erosion between the settlements and with the urban area of Swindon with development being managed and located to avoid coalescence; and
- To protect the health, safety and wellbeing of these rural communities whilst maintaining the quality of life.

3.8 The respective objectives and issues identified from the consultation are defined within the five sections for policy sections comprising: Employment, Transport, Environment, Facilities, and Housing. These policies are as follows:

Employment

Policy 1 To enhance the prospects for local employment

Transport

Policy 2 To improve road safety

Policy 3 To improve pedestrian and cycle networks

Environment

- Policy 4 To protect key local landscapes
- Policy 5 To protect settlement identity
- Policy 6 To protect land from flooding

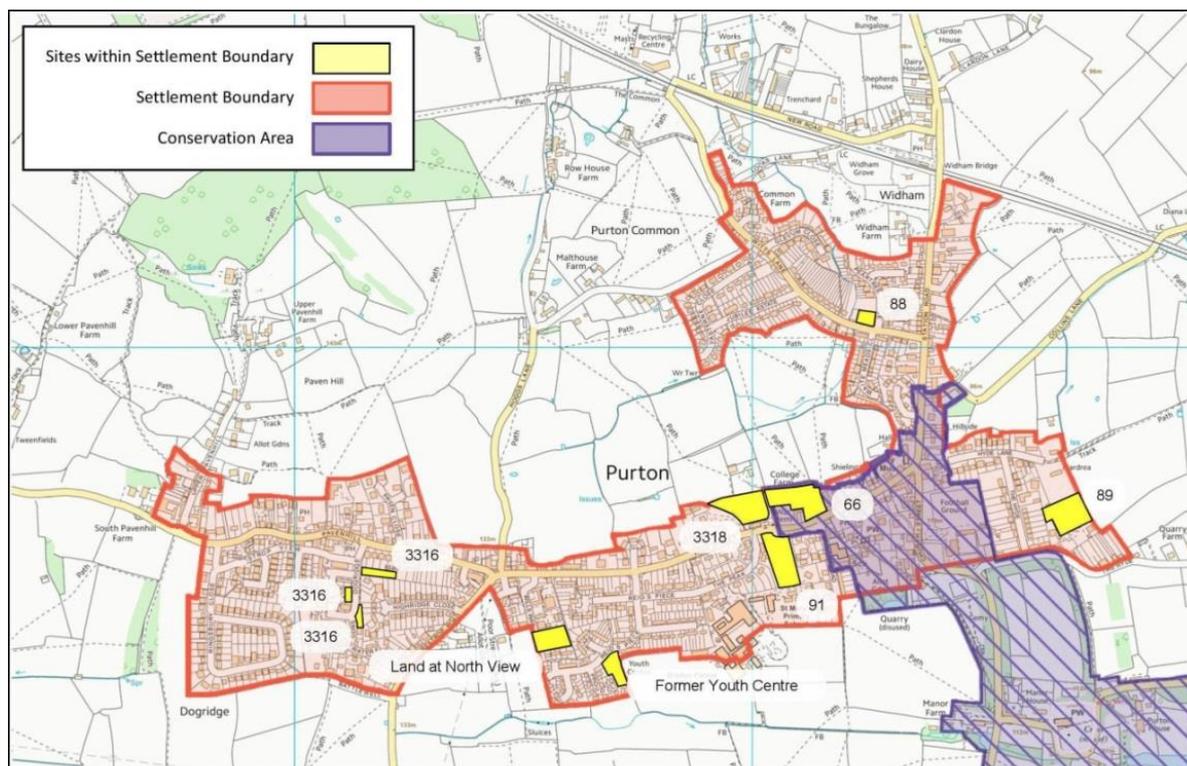
Facilities

- Policy 7 To enhance the Pavenhill Shopping Parade
- Policy 8 To enhance the facilities for the elderly
- Policy 9 To extend the cemetery
- Policy 10 To protect the existing allotments

Housing

- Policy 11 To state development principles
- Policy 12 To allocate land for development outside the settlement boundary

3.9 Within the settlement boundary for Purton, land is identified with potential for housing at the locations listed (identified below) and any windfall sites as they may occur. Development at each site shall reflect local character in terms of design, scale, and type and target smaller sizes to be provided for first time buyers.



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- Site 66 - Derelict Cottage Farm 16 houses⁷
- Site 82 – Mardrea 14 houses
- Site 88 - Corner Site (Peartree Close) 8 houses⁸
- Site 89 - Blake House 16 houses
- Site 91 - Land at Northcote 15 houses

⁷ For those sites within the settlement boundary, the housing numbers are from the 2012 SHLAA, for the last two sites not in the SHLAA, housing numbers are calculated on WC SHLAA Methodology

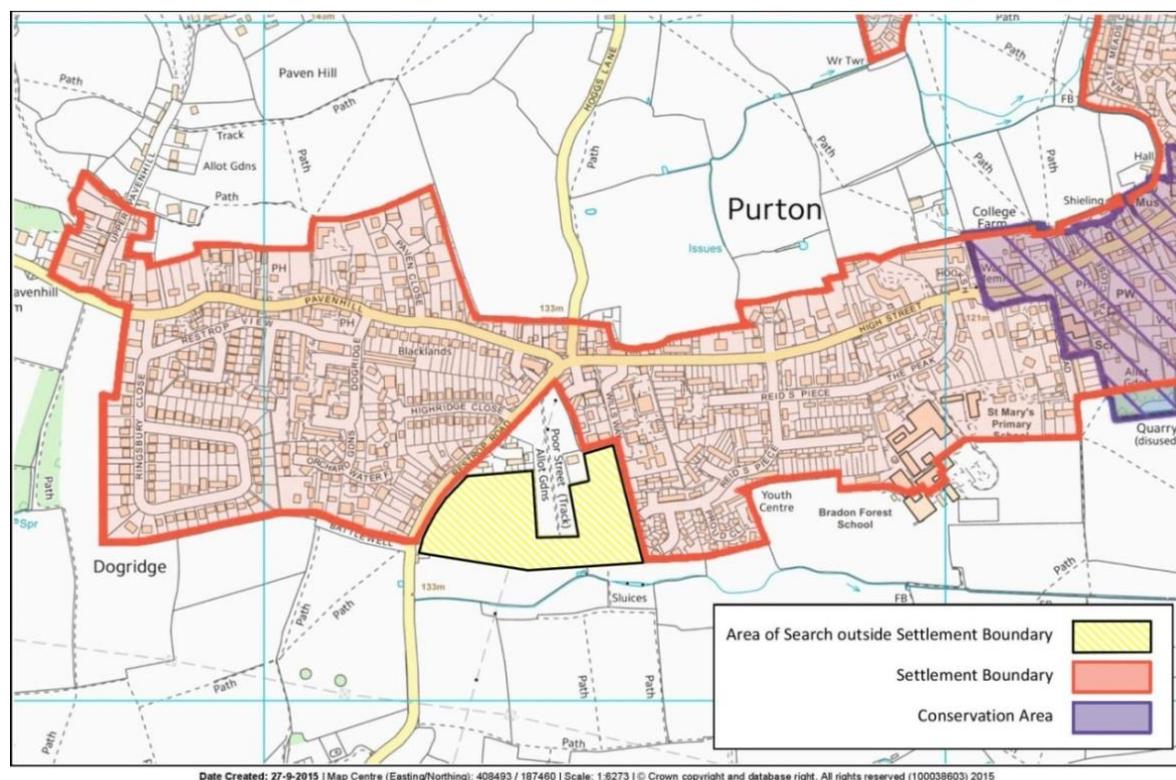
⁸ Four houses were actually permitted rather than eight in the 2012 SHLAA

- Site 3316 - three sites in Dogridge 10 houses⁹
- Site 3318 - Hooks Hill 14 houses¹⁰
- Land at North View 12 houses
- Former Youth Centre 7 houses

Site Assessment

3.10 The Neighbourhood Plan is supported by the briefing paper, *Purton ~ Planning for the Future*. The document contains a detailed assessment of the potential sites based on criteria including distances to key village services, risk of or known flooding, potential impacts on landscape and views, potential impacts on heritage and biodiversity, ease of access and added value to the village. The intention of the site selection process was to “design out” potential impacts and choose locations which would be sustainable. Each housing site considered has a detailed ‘site analysis’ included within Annex 8 (employment sites are analysed in Annex 9) of the Planning for the Future document. This site analysis indicates any special qualities on or near to the site whilst suggesting potential mitigation and/or improvements which would be suitable if development occurred in that location.

3.11 For the sites which were chosen, the policies designating the sites use the site analysis within the Planning for the Future document to impose conditions on the development which aim to protect any special qualities which may have been identified. This includes the historic environment; both listed buildings and unlisted buildings, landscape aspects as well as access requirements. Furthermore the conditions stipulate that development should reflect the built form of the surrounding area.



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⁹ Representative for the site suggested 10 on the submission form, source WC July 2016

¹⁰ Representative for the site suggested 20 on the submission form, source WC July 2016

4 SEA Screening Assessment

- 4.1 Wiltshire Council, as the 'Responsible Authority', consider that the Purton Neighbourhood Plan falls within the scope of the SEA Regulations on the basis that it is a plan that:
- a) is subject to preparation or adoption by an authority at national, regional or local level (Regulation 2);
 - b) is prepared for town and country planning or land use and it is a plan that sets the framework for future development consent of projects generally (Regulation 5, para. 4); and
 - c) will apply to a wider area other than a small area at local level and is not a minor modification to an existing plan or programme (Regulation 5, para. 6).
- 4.2 A determination under Regulation 9 is therefore required as to whether the Purton Neighbourhood Plan is likely to have significant effects on the environment.
- 4.3 The screening requirements set out in Regulation 9 and Schedule 1 of the SEA Regulations include two sets of characteristics for determining the likely significance of effects on the environment. These relate to: i) the characteristics of the Purton Neighbourhood Plan and ii) the characteristics of the effects and of the area likely to be affected by the Purton Neighbourhood Plan. In making a determination, Wiltshire Council will take into account the criteria specified in Schedule I of the Regulations as follows:

1. The characteristics of the plans and programmes, having regard in particular to:

- (a)** the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;
- (b)** the degree to which the plan or programme influences other plans and programmes including those in a hierarchy;
- (c)** the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development;
- (d)** environmental problems relevant to the plan or programme; and
- (e)** the relevance of the plan or programme for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).

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

- (a)** the probability, duration, frequency and reversibility of the effects;
- (b)** the cumulative nature of the effects;
- (c)** the transboundary nature of the effects;
- (d)** the risks to human health or the environment (for example, due to accidents);
- (e)** the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);

(f) the value and vulnerability of the area likely to be affected due to—

- (i)** special natural characteristics or cultural heritage;
- (ii)** exceeded environmental quality standards or limit values; or
- (iii)** intensive land-use; and

(g) the effects on areas or landscapes which have a recognised national, Community or international protection status.

4.4 The screening assessment of the Purton Neighbourhood Plan is set out below:

Criteria (Schedule 1 SEA Regulations)	Significant environmental effects likely?	Justification and Evidence
1. The characteristics of plans, having regard, in particular, to:		
(a) the degree to which the plan sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources	No	The neighbourhood plan is allocating several sites for residential development within the existing settlement boundary of approximately 100 dwellings spread across 12 sites (several of which are “brownfield”). The majority of these sites are within the settlement boundary and as such are in accordance with Core Policies 1 and 2 of the Wiltshire Core Strategy which has been subject to SEA. The Plan, through Policy 12, also supports the development of land for a medium-sized development of up to 40 mixed dwellings outside of the settlement boundary. The characteristics of the site were assessed in the supporting document ‘Planning for the Future’ to analyse the sites potential effect on any environmental receptors.
(b) the degree to which the plan influences other plans and programmes including those in a hierarchy	No	The neighbourhood plan is produced by the local community to influence development at the local parish level. It does not influence strategic plans higher up in a hierarchy, although any potential future review of the Wiltshire Core Strategy will need to give consideration to the Plan’s proposals.
(c) the relevance of the plan for the integration of environmental considerations in particular with a view to promoting sustainable development	No	The neighbourhood plan is a land-use plan that seeks to promote the objectives of sustainable development. However, it is not specifically relevant as a plan for integrating environmental considerations. Any development proposed will be in accordance with environmental protection policies of the adopted Wiltshire Core Strategy and National Planning Policy Framework (NPPF).
(d) environmental problems relevant to the plan	No	There are no specific environmental problems relevant to this plan.
(e) the relevance of the plan for the implementation of Community legislation on the environment (for example, plans and programmes linked to waste management or water protection).	No	The neighbourhood plan is not relevant as a plan for implementing Community legislation.

Criteria (Schedule 1 SEA Regulations)	Significant environmental effects likely?	Justification and Evidence
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:		
(a) the probability, duration, frequency and reversibility of the effects	No	Any environmental effects are not considered to be significant judging by the proposals in the neighbourhood plan. Any effects of the limited amount of development proposed is likely to be localised, short-term and related to the construction stage. Through detailed work on the site allocations, the Neighbourhood Plan Steering Group has given consideration to the potential for significant effects on a number of criteria including flood risk, heritage assets and biodiversity, but the assessments have not resulted in evidence that the proposed allocations would have such effects.
(b) the cumulative nature of the effects	No	No cumulative effects considered to be significant.
(c) the transboundary nature of the effects	No	No significant transboundary effects with other EU countries are likely from the proposals.
(d) the risks to human health or the environment (e.g. due to accidents)	No	No significant environmental effects are considered likely to risk human health or the environment.
(e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected);	No	The neighbourhood plan covers a parish which includes the villages of Purton and Purton Stoke. The parish has a population of approximately 4,271 people in 1,701 households (ONS census 2011). Significant effects due to the geographic size of the area and population size are not considered likely.
(f) the value and vulnerability of the area likely to be affected due to— (i) special natural characteristics or cultural heritage; (ii) exceeded environmental quality standards or limit values; or (iii) intensive land-use;	No	There are two SSSIs located within the designated plan area. Only the Restrop Farm and Brockhurst Wood SSSI is located in proximity to development and would require consultation with NE for residential development of over 50 dwellings (as stated in Annex 8 of Planning for the Future), however the allocation is only 40 dwellings and not considered likely to significantly affect the SSSI. Furthermore the site selection process in Annex 8 considers biodiversity aspects, these then inform the requirements included in the policy allocation such as further biodiversity evidence gathering and consultation to ensure the protection of the local biodiversity identified. Part of the village of Purton is designated as a conservation area and there are a high number of listed buildings. However, development proposed that is in conformity with the

Criteria (Schedule 1 SEA Regulations)	Significant environmental effects likely?	Justification and Evidence
		Core Strategy, in particular Core Policies 50 and 58, is not considered likely to significantly affect these environmental assets. The neighbourhood plan also contains policy to protect, conserve and where possible enhance the conservation area and heritage assets and is therefore not considered likely to significantly affect these important heritage and environmental assets. The housing site allocations policies and the plan's evidence base adequately justify that the allocations would not result in significant effects on heritage assets. Where required, mitigation measures are identified to maintain the setting of heritage assets.
(g) the effects on areas or landscapes which have a recognised national, Community or international protection status.	No	There are no designated sites in proximity to allocated development sites. There are no European Natura 2000 designations nearby.

5 SEA Screening Decision

- 5.1 Regulation 9 of the SEA Regulations requires that the responsible authority shall determine whether or not a plan is likely to have significant environmental effects. The responsible authority shall —
- (a) take into account the criteria specified in Schedule 1 to these Regulations; and
 - (b) consult the consultation bodies.
- 5.2 Where the responsible authority determines that the plan is unlikely to have significant environmental effects (and, accordingly, does not require an environmental assessment), it shall prepare a statement of its reasons for the determination.
- 5.3 Wiltshire Council considers that the proposed Purton Neighbourhood Plan is not likely to have significant environmental effects and accordingly does not require a Strategic Environmental Assessment. This decision is made for the following key reasons:
1. The neighbourhood plan proposals are considered to be in general conformity with the Wiltshire Core Strategy which has been subject to SEA and HRA assessments. The Core Strategy was adopted on 20th January 2015.
 2. In the settlement strategy outlined in Core Policy 1 of the Wiltshire Core Strategy Purton is identified as a large village whilst Purton Stoke is a small village. Purton has a settlement boundary whereas Purton Stoke is located outside the settlement boundary. The Core Strategy states that development at Large Villages will be limited to that needed to help meet the housing needs of settlements and to improve employment opportunities, services and facilities. There is a general presumption against development outside the defined limits of development, although the strategy will allow carefully managed development in specific cases such as when brought forward through a neighbourhood plan.
 3. The site selection process in the Purton Neighbourhood Plan was designed to choose locations which would be sustainable. The site analysis which was undertaken indicates any special qualities on or near to each site whilst suggesting potential mitigation and/or improvements which would be suitable if development occurred in that location. For the sites which were chosen, the policies designating the sites impose conditions on the development which aim to protect any special qualities which may have been identified.
 4. The neighbourhood plan area includes several SSSIs and a conservation area, all of which will restrict the location of new development. The neighbourhood plan includes policy to protect and enhance these valuable environmental and heritage assets with the allocation of development sites only to be located in sustainable locations. The plan's evidence has paid particular attention to the site allocation's effects on heritage assets. The assessments concluded that there would be no significant effects but where appropriate, additional measures are referenced in the site allocations policies to preserve the setting of heritage assets.

6 Post consultation

- 6.1 This screening decision was sent to Natural England, Environment Agency and Historic England for their comments in respect of this determination, with a request for responses within a 5 week period, no later than 15th March 2017. The responses are shown in full in Appendix 1.
- 6.2 Natural England and Environment Agency concurred with the conclusion that an SEA is not required. Historic England was unable to agree that an SEA will not be required. The response stated that some discrete gaps in the evidence base should be filled “to demonstrate that unacceptable levels of harm won’t be caused to designated heritage assets” and that “on the basis of the information available it is not clear that even if the sites are deemed suitable for development in principle that they can accommodate the levels identified against them. It is important to ensure that the policies within the Plan do not inadvertently cause harm to heritage assets or that in order to avoid doing so they are unable to deliver the levels of housing promoted.”
- 6.3 Following the consultation further work was undertaken to fill the discrete gaps in evidence identified by Historic England. This included reviewing policies 11 and 12 and adding a policy on Play Areas, Leisure and Open Spaces (therefore making policies 11 and 12 become 12 and 13 respectively). There was corresponding amendments made to the Planning for the Future Document used as part of the evidence base.
- 6.4 The amendments made to the policy 12 include:
- Removing 3 sites
 - Specific targets for each site have been removed to allow the final development to be informed by further assessments
 - Specific criteria have been introduced to emphasise landscape and heritage issues
 - Supporting text has been amended
- 6.5 Policy 13 was amended by adding:
- Specific criteria on landscape and heritage
 - New supporting text sets the context and the reasoning for the new criteria
- 6.6 Consequently the revised plan takes the below form. With policies as follows:

Employment

Policy 1 To enhance the prospects for local employment

Transport

Policy 2 To improve road safety

Policy 3 To improve pedestrian and cycle networks

Environment

Policy 4 To protect key local landscapes

Policy 5 To protect settlement identity

Policy 6 To protect land from flooding

Facilities

Policy 7 To enhance the Pavenhill Shopping Parade

Policy 8 To enhance the facilities for the elderly

Policy 9 To extend the cemetery

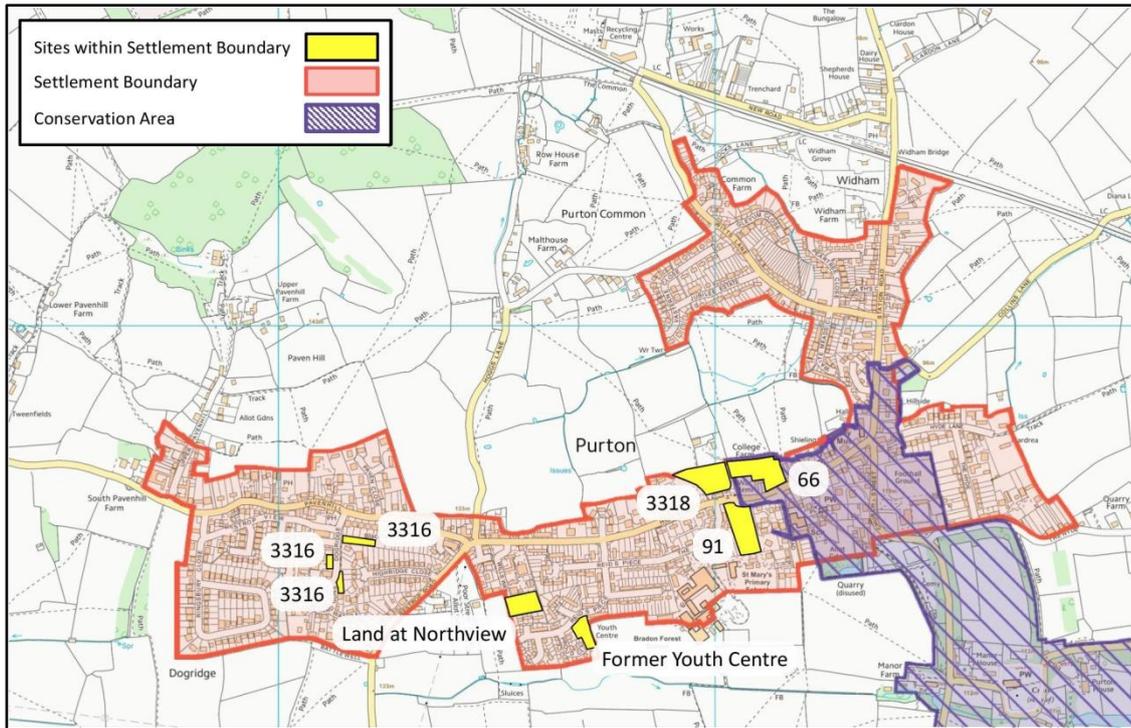
Policy 10 To protect the existing allotments

Policy 11 Play Areas, Leisure and Open Space

Housing

Policy 12 To state development principles

Policy 13 To allocate land for development outside the settlement boundary



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Within the settlement boundary for Purton land is identified with potential for approximately 75 homes at the locations listed below and identified on map 11 (shown above)

- *Site 66 - Derelict Cottage Farm*
- *Site 91 - Land at Northcote*
- *Site 3316 - three sites in Dogridge*
- *Site 3318 - Hooks Hill*
- *Land at North View*
- *Former Youth Centre (with the adjoining garages and green space)*

- 6.7 After reviewing these changes, Historic England concluded that they would have no objection to the view that an SEA would not be required (see Appendix 2). Confirmation has also been received from our conservation team, at the request of Historic England, that the level of information produced for this neighbourhood plan in respect of heritage is acceptable. Where relevant the response has been used in Appendix 1 and 2, with the full response shown in Appendix 3.

7 Post Regulation 14 consultation

- 7.1 Prior to submission to Wiltshire Council, the Purton Neighbourhood Plan has been amended to take into account comments received during their regulation 14 consultation. It is considered that the changes, including the new policy on ecological enhancements, will provide additional environmental protection to the area and that no likely significant negative environmental effects will result.

Appendix 1: Consultee comments and Council responses to the SEA Screening consultation

Consultee	Consultee Comments	Wiltshire Council response
Natural England 13 March 2017	I can confirm that, insofar as the natural environment is concerned, Natural England sees no reason to challenge your view that a SEA is not required.	Comments noted.
Environment Agency 16 March 2017	<p>Thank you for consulting the Environment Agency on the above SEA screening opinion.</p> <p>We are encouraged to see significant consideration has been given to the issue of flooding in and around Purton. Surface water flooding has been considered and a stand-alone policy on flood risk has been included.</p> <p>We note that none of the sites for new housing are within flood zones 2 and 3.</p> <p>Therefore we have no reason to believe that the Plan would require a SEA; we concur with your conclusion that an SEA is not required.</p>	Comments noted.
Historic England 16 March 2017	<p>Many thanks for your consultation on the SEA Screening for the January 2017 draft of the Purton Neighbourhood Plan.</p> <p>This is our first involvement with this Plan so it is useful to have the opportunity to familiarise ourselves with its ambitions while still at a formative stage.</p> <p>We are pleased to note that the Plan seeks to protect the distinct character and identity of the area (pp13,19 & 28) and that this is reflected in the suite of policies it contains. The focus of our attention is the allocation of sites for housing in Policies 11 & 12 and ensuring that this provision avoids causing harm to</p>	Comments noted.

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	<p>designated heritage assets. Evidence in support of the policies is contained within the “Purton ~ Planning for the Future” report.</p> <p>This report starts with possible housing sites identified within the 2015 draft SHLAA as shown in Figure B on p25. The associated key includes Scheduled Ancient Monuments but exclude Listed Buildings and Conservation Areas. These sites are then subject to site assessment criteria in figure 3 on p 25, elaborated upon in Table 2 on p26, which includes their potential to affect heritage assets. Scoring criteria are then applied and each site is finally subjected to a detailed site evaluation. SHLAA methodology is applied to determine the quantum of housing units or development density which each site is then deemed capable of accommodating.</p> <p>The “Purton ~ “ report is most impressive and considerable thought has clearly been given to fully articulating the heritage assets relevant to each site and detailing how their development should respond accordingly. There are a few points associated with this approach which it is worth highlighting:</p> <ol style="list-style-type: none"> 1. That a site may be on a SHLAA list doesn’t automatically imply that it has been robustly and adequately checked against relevant heritage asset considerations. We are therefore pleased that a follow up evaluation exercise has been undertaken. 	
<p>Historic England 16 March 2017</p>	<ol style="list-style-type: none"> 2. Scoring has been used against relevant criteria to determine the most suitable sites. This is not necessarily an appropriate methodology as regardless of other criteria outcomes if any sites are likely to cause significant harm to heritage assets then the NPPF indicates that on this basis alone they might not be 	<p>Specific criteria have been introduced post SEA Screening consultation to emphasise landscape and heritage issues. Further information has been included within each site analysis to take more heritage information into consideration than distance to heritage assets. This includes the potential effect of development at each location on the setting of heritage assets as well as opportunities for improvement that development might bring.</p>

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	suitable for development.	
Historic England 16 March 2017	3. No details on the SHLAA methodology for determining site densities have been made available. It is important to bear in mind that an informed response to identified heritage assets may mean that an individual approach to the calculation of units for each site needs to be taken.	Consideration of heritage assets within the site analysis has led to recommendations regarding the developable area of the site and consequential reductions in potential numbers where relevant in the revised Planning for the Future document.
Historic England 16 March 2017	4. Redevelopment of brownfield sites may be unlikely to be inappropriate in principle, even in a Conservation Area, but the contribution made by the site to the character and appearance of that Area needs to be understood in order to inform that redevelopment and ensure that it constitutes at least preservation if not actual enhancement. The site assessments in the “Purton ~” report don’t generally provide a clear assessment of the assets’ significance – only what the response should be. Without the middle part of the narrative it is difficult to confirm that the right conclusions and recommendations have been identified.	Our conservation team has reviewed the revised Plan and Planning for the Future document and acknowledges that the terminology used in the report is not as technical as one sees within the conservation profession but the group have noted the additional consideration that needs to be given for all the listed buildings in the village. They have also noted where the conservation boundary is, as well as clearly marking designated heritage assets by grade on the maps. As such, although the assessment of significance for each listed building does not go in depth using the four main categories of definition, the group have ranked all listed buildings and the conservation area as worthy of special consideration and looked at proximity of listed buildings to each potential development site. The term ‘heritage assets’ is used, and although undesignated heritage assets are not largely picked out, this will cover undesignated as well as designated heritage assets. It is considered that the level of information produced for this neighbourhood plan in respect of heritage is acceptable.
Historic England 16 March 2017	5. It is important to remember that the NPPF states that the starting point and overall objective of the site evaluation and allocation exercise is to avoid causing harm to heritage assets. The analysis of College farm (site 66) on p31 of the “Purton ~” report states that development should be laid out to “mitigate” harm, which suggests that harm is likely. This may just be a use of the wrong term as each has a specific technical application but if “mitigation” has been accurately used it highlights the need to make explicit what harm will be caused and that	Wording within the revised Planning for the Future document regarding site 66 has been amended so it does not use the incorrect terminology.

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	it can be reduced to an acceptable level.	
Historic England 16 March 2017	6. The analysis of Site 89 (Blake House, p40) refers to the nearest designated heritage asset being 380m away and that there is no line of site with it or any other. Proximity and visibility are in themselves not exclusive determinants of impact or harm as the Setting of each asset needs to be determined individually. Even one some considerable distance away and out of sight may have its setting affected. That is not to assert that harm will occur in this instance, only that the rationale supplied does not necessarily substantiate its absence.	Site 89 Blake House has been built out therefore it is no longer referenced in the revised Planning for the Future document or the Plan post SEA Screening.
Historic England 16 March 2017	7. This is exemplified in Policy 12 which allocates land outside the settlement boundary for development which clearly has potential to impact on the settings of the Ringsbury Camp Scheduled Monument and Grade II* Listed Restrop House which it is believed avoiding intervisibility will prevent. But it is not clear that, or how, avoiding intervisibility will in itself and in isolation prevent such harm.	Policy 12 has been significantly redrafted to respond to comments made during the SEA Scoping consultation. A section has been included in the Plan to ensure that proposed development will respect the specific character of the Conservation Area and the setting of Purton's historic buildings.
Historic England 16 March 2017	8. No reference has been made to the methodology that has been used for assessing the significance of the relevant designated heritage assets or how judgement has been made. It is not clear whether your authority has brought our guidance on such exercises to the attention of the community and as this is our first involvement in the preparation of this Plan we have not had an opportunity previously to do so ourselves. Guidance on Policy Formulation, Setting and SEAs is available at: https://historicengland.org.uk/images-	Response to the assessment of significance is discussed against point 4 above.

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	<p>books/publications/gpa1-historic-environment-local-plans/ https://historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/ https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/</p>	
<p>Historic England 16 March 2017</p>	<p>These observations highlight two points: that in some cases filling in discrete gaps in the evidence base is desirable to demonstrate that unacceptable levels of harm won't be caused to designated heritage assets; and that on the basis of the information available it is not clear that even if the sites are deemed suitable for development in principle that they can accommodate the levels identified against them. It is important to ensure that the policies within the Plan do not inadvertently cause harm to heritage assets or that in order to avoid doing so they are unable to deliver the levels of housing promoted.</p> <p>Regrettably therefore we are unable on the basis of the information provided to agree with your Screening Determination that an SEA will not be required. This also suggests that the Plan and its evidence might not as they stand be able to demonstrate the requisite level of conformity with national and local planning policy.</p> <p>However, we suspect that the provision of the necessary evidence to allow us to amend our position should be a reasonably straightforward exercise and may only involve modest adding of information to the documents already available.</p> <p>We look forward to receipt of further information in due course.</p>	<p>The Planning for the Future document and Policies 12 and 13 (new numbering) within the Plan have been subject to redrafting. This redrafting was done specifically to address the gaps in the evidence base identified during the SEA Screening consultation and ensure that the level of development anticipated for each site can be accommodated.</p>

Appendix 2: Consultee comments and Council responses to revised Plan post SEA Screening consultation

Consultee	Consultee Comments	Wiltshire Council response
Historic England 6 June 2017	<p>Policy 12 (formerly 11) now identifies 6 sites with potential for approximately 75 homes. No quanta have been set against individual sites but presumably there is enough confidence, based on evidence, to believe that that overall figure is deliverable. As far as I can see, development density generally remains common to all sites and is still drawn from SHLAA methodology of 30 houses per hectare. The policy in its revised form assumes that a) each site is still capable of some level of development, and b) without knowing individual site levels the eventual total will allow for around 75 homes to be built.</p> <p>The policy has been expanded to include heritage considerations which need to be addressed but without specifying exactly what this needs to embrace. However, the revised Planning for the Future document provides more detailed elaboration. Pages 32 & 33 illustrate a developable area for Site 66 of 0.44 ha leading to a maximum of 11 houses. They also identify other factors which should influence the nature and footprint of development. While the document doesn't actually contain evidence on the nature of the significance of the relevant heritage assets I assume that the responses to it as set out are appropriate for their protection and based on a sufficiently informed level of understanding which the Council's conservation team can verify.</p> <p>Similarly, site 91, p38, indicates that to preserve the setting of relevant designated heritage assets consideration should be given to retaining the frontage to the High Street. This seems a</p>	<p>Although the quantum of development for each site has not been included within the Plan, information on how the figures were derived are included in the Planning for the Future document. While the standard density is 30 dwellings per hectare (based on the SHLAA methodology) these figures incorporate analysis from Annex 8 (of the Planning for the Future document) which includes heritage considerations.</p> <p>Our conservation team has reviewed the revised Plan and Planning for the Future document and acknowledges that the terminology used in the report is not as technical as one sees within the conservation profession but the group have noted the additional consideration that needs to be given for all the listed buildings in the village. They have also noted where the conservation boundary is, as well as clearly marking designated heritage assets by grade on the maps. As such, although the assessment of significance for each listed building does not go in depth using the four main categories of definition, the group have ranked all listed buildings and the conservation area as worthy of special consideration and looked at proximity of listed buildings to each potential development site. It is considered that the level of information produced for this neighbourhood plan in respect of heritage is acceptable.</p>

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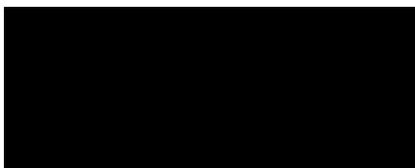
	<p>bit woolly. Either such an approach is required to preserve the setting and to constitute acceptable development or it isn't. If the evidence to support such an approach isn't clear then maybe it needs further attention. I appreciate that the wording isn't so ambiguous as far as the retention of the stone building is concerned. Again, the conservation team can no doubt provide clarification.</p>	
<p>Historic England 6 June 2017</p>	<p>We note that site 89 has now been excluded.</p> <p>Policy 13 (formerly 12) has now changed its wording from being a site allocation to an area of search. However, there is still a line drawn around the site and it is still being allocated for up to 40 homes. This therefore remains an allocation regardless of the wording as the presumption would still seem to be that the area can deliver up to 40 homes in some way while still satisfying the full requirements of the policy and evidence exists to demonstrate that fact. The use of the term "area of search" is confusing and perhaps misplaced in this context.</p> <p>The site is an amalgam of parts of sites 440 & 470. The Planning for the Future document identifies the relevant heritage considerations for these sites on pp 43 & 59. The nature of the heritage significance is not identified but appropriate responses have been set out. Once more we assume that the Council's conservation team can verify this approach.</p>	<p>The previous draft of the Plan also defined development outside of the settlement boundary as within an 'area of search'. It is important to note that the area of search is being treated as an allocation with the same analysis and methodology as the other allocations within the settlement boundary.</p> <p>In a similar manner to the above, our conservation team has reviewed the revised Plan and Planning for the Future document and believes that the level of information produced for this neighbourhood plan in respect of heritage is acceptable.</p>
<p>Historic England 6 June 2017</p>	<p>It is quite reasonable for advice from the Council's conservation team to constitute appropriate evidence. To do so it will be important to ensure that this advice is captured in written form – either as a source or as written confirmation of the suitability of information gathered by others. On the basis that such an exercise will be completed to substantiate the policies and assertions made in the Plan and its supporting documents I can</p>	<p>Comments noted.</p>

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	<p>confirm that we have no objection to the Plan.</p> <p>I can also confirm that if this were also to form the basis of a revised SEA Screening exercise we would have no objection to the view that an SEA would not be required.</p>	
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Appendix 3: Response from Wiltshire Council Conservation team

From:
To:
Cc:
Subject:
Date:
Attachments:



Dear [REDACTED]

I have looked through the documents prepared for the Purton NP and also seen the comments from David at Historic England.

The Purton NP group have worked very hard to assess each site and consider heritage assets that may be affected should development be considered on each site. I acknowledge that the terminology used in the report is not as technical as one sees within the conservation profession but the group have noted the additional consideration that needs to be given for all the listed buildings in the village. They have also noted where the conservation boundary is, as well as clearly marking designated heritage assets by grade on the maps. As such, although the assessment of significance for each listed building does not go in depth using the four main categories of definition, the group have ranked all listed buildings and the conservation area as worthy of special consideration and looked at proximity of listed buildings to each potential development site. The term 'heritage assets' is used, and although undesigned heritage assets are not largely picked out, this will cover undesigned as well as designated heritage assets. I consider that the level of information produced for this neighbourhood plan in respect of heritage is acceptable.

Regards

[REDACTED]

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

Please could you submit all new, revised or additional details for Pre-apps, Applications or Discharge of Conditions to developmentmanagement@wiltshire.gov.uk quoting the application reference number and including a completed Application form or Discharge of Conditions form. Forms can be downloaded from our website <http://www.wiltshire.gov.uk/planninganddevelopment/planningapplicationformsandfees/planningapplicationpacks.htm?a=list>

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