

Malvern Hills District Council
Forward Planning
Civic Centre
Queen Elizabeth Drive
Persnore
WR10 1PT

Our ref: SV/2010/104077/SE-
01/DS1-L01

Your ref:

Date: 26 March 2020

F.A.O: Mr Reiss Sadler

Dear Sir

HALLOW DRAFT NEIGHBOURHOOD PLAN - STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA) AND HABITATS REGULATIONS ASSESSMENT (HRA) SCREENING OPINION.

Thank you for referring the above consultations, which were received on 24 February 2020. We would offer the following comments to assist your consideration at this time.

Strategic Environmental Assessment: The European Union directive 200142/EC requires a SEA to be undertaken for certain types of plans and programmes that would have 'significant' environmental effect(s). Furthermore paragraph: 046 in the Flood Risk and Coastal Change section of the National Planning Practice Guidance (NPPG) (Reference ID: 11-046-20150209) states "*a strategic environmental assessment may be required, for example, where:*

- *a neighbourhood plan allocates sites for development*
- *the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan*
- *the neighbourhood plan is likely to have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan*".

Whilst, in consideration of the matters within our remit, the Neighbourhood Plan is considered unlikely to have significant environmental impacts we note in that a full SEA may be required as the Plan proposes a land allocation for development adjacent to an existing allocation within the SWDP.

Habitats Regulation Assessment: *Article 6(3) of the European Habitats Directive (1992) requires that any plan (or project), which is not directly connected with or necessary to the management of a European site (also known as a "Natura 2000" site), but would be likely to have a significant effect on such a site, either individually or in combination with other plans*

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or projects, shall be subject to an 'appropriate assessment' of its implications for the European site in view of the site's conservation objectives.

To assist your Council's determination of the HRA Screening opinion, we advise that based on the Screening Report submitted, and in consideration of the matters within our remit, the Neighbourhood Plan is considered unlikely to have significant effects on the European designated sites.

Going Forwards: We sent your Council a copy of our Neighbourhood Plan pro-forma guidance for distribution to Parish Councils. The purpose of the guidance is to assist the preparation of Neighbourhood Development Plans, including an appropriate evidence base. This includes consideration of some of the relevant environmental issues that should be considered, including flood risk (from rivers and sea), water quality, water resources and includes latest Climate Change recommendations for flood risk. Since we produced this guidance we have updated our climate change allowances for planners. See Flood risk assessments: climate change allowances for more information. I have also enclosed a copy of area climate change guide to further assist.

For each proposed site allocation, we recommend completing the pro-forma to check the environmental constraints. This will help collect evidence, identify challenges, inform policy and assist delivery of sustainable solutions.

With regards any additional housing allocations proposed within the draft Plan we would only make substantive further comments if the Plan was seeking to allocate sites for development in Flood Zones 3 and/or 2 (the latter being used as the 1% climate change extent). Furthermore, we do not offer detailed bespoke advice on policy but advise you ensure conformity with your Local Plan 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 that the above is of use to you at this time.

Yours faithfully

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