



# Screening Assessment of the Gnosall Draft Neighbourhood Plan

Strategic Environmental Assessment &  
Habitats Regulations Assessment

Stafford Borough Council

January 2015



## 1. Introduction

1.1. Gnosall Parish Council has prepared a draft Neighbourhood Plan (NP) proposing new development that reflects the needs of the community. The draft Plan has undergone extensive community consultation, which has helped the development of planning policies which will shape future growth and development within the Neighbourhood Plan area. The Neighbourhood Plan is currently undergoing a pre-submission consultation which ends on the 22 January 2015. Following this public consultation, the Parish Council will be preparing to submit the draft Neighbourhood Plan to the Borough Council to proceed to independent Examination and subsequent Referendum.

1.2. In order for Neighbourhood Plans to proceed to referendum, they must meet the Basic Conditions set out in the Town and Country Planning Act 1990 Act<sup>1</sup>, which was inserted by the Localism Act 2011. The Borough Council needs to be satisfied that the Basic Conditions have been met. The neighbourhood plan must:

- have regard to national policy
- have special regard to listed buildings (where relevant)
- have special regard to conservation areas (where relevant)
- contribute to sustainable development
- be in general conformity with strategic policies in the Local Plan
- not breach EU obligations

1.3. Gnosall Parish Council who is the responsible body for preparing the Neighbourhood Plan will produce an appraisal on the Neighbourhood Plan to ensure the proposals and policies contained within the Neighbourhood Plan meet the basic conditions. A Basic Conditions Statement is being prepared; this will be submitted to the Borough Council alongside the final neighbourhood plan.

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<sup>1</sup> Paragraph 8 of Schedule 4B.

## **2. Compatibility with EU obligations**

- 2.1. To meet the basic conditions the draft Gnosall Neighbourhood Plan must not breach EU obligations.
- 2.2. The Borough Council has prepared this screening assessment to determine whether the content of the Gnosall Neighbourhood Plan requires a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004; and / or a Habitats Regulation Assessment (HRA) in accordance with Article 6(3) of the EU Habitats Directive and with Regulation 61 of the Conservation of Habitats and Species Regulations 2010 (as amended).
- 2.3. The National Planning Practice Guidance offers the following examples of when an SEA may be required, for example, where:
  - a) A Neighbourhood Plan allocates sites for development;
  - b) The Neighbourhood Plan area contains sensitive natural or heritage assets that may be affected by the proposals in the plan; or
  - c) The Neighbourhood Plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.
- 2.4. In the context of neighbourhood planning, a Habitats Regulation Assessment (HRA) is required where a Neighbourhood Plan is deemed likely to result in negative significant effects occurring on protected European Sites (Natura 2000 sites), as a result of the Plan's implementation.



**Table 1 SEA Screening Process**

Stage	Yes or No	Reason
<p><b>Is the Neighbourhood Plan (NP) subject to preparation and/or adoption by a national, regional or local authority, OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))</b></p>	<p>Yes (go to question 2).</p>	<p>The preparation and adoption of the Neighbourhood Plan (NP) is regulated under the Town and Country Planning Act 1990 as amended by the Localism Act 2011. The draft NP is prepared by Gnosall Parish Council (as the 'relevant body') and will be 'made' by Stafford Borough Council as the local authority.</p> <p>The preparation of NPs is subject to the following regulations: The Neighbourhood Planning (General) Regulations 2012 and The Neighbourhood Planning (referendums) Regulations 2012.</p>
<p><b>Is the NP required by legislative, regulatory or administrative provisions? (Art. 2(a))</b></p>	<p>No (go to question 3).</p>	<p>Whilst the NP is not a requirement and is optional under the provisions of the Town and Country Planning Act as amended by the Localism Act 2011, it will, if 'made', form part of the Development Plan. It is therefore important and necessary to answer the following questions to determine whether the policies of the draft NP are likely to have significant environmental effects and if further environmental assessments will be required under the EU Directive.</p>
<p><b>Is the NP prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art. 3.2(a))</b></p>	<p>Yes (go to question 5).</p>	<p>The draft NP is being prepared for town and country planning and land use purposes. It allocates sites for future housing development, safeguards sites of open space and recreation and helps encourage local economic growth.</p> <p>As such, the draft NP contains a framework for future development consent of development projects, which may fall under section 10 of the Annex II of the EIA Directive.</p>

<b>Will the NP, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2(b))</b>		See HRA screening below.
<b>5. Does the NP determine the use of small areas at local level OR is it a minor modification of a plan or programme subject to Art. 3.2? (Art. 3.3)</b>	Yes (go to question 8).	The draft NP identifies sites for new housing development with planning permission and allocates further sites for housing development within a new defined settlement boundary. It also designates and safeguards sites of valued open space and recreation within the NP area.
<b>6. Does the NP set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art. 3.4)</b>		Not applicable.
<b>7. Is the NP's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget plan or programme, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art. 3.8, 3.9)</b>	No	Not applicable.
<b>8. Is it likely to have a significant effect on the environment? (Art 3.5)</b>	No	The Draft NP is unlikely to have any significant effect on the environment. Please see Appendix 1 and Appendix 2 which provide a detailed assessment to support this conclusion.

3.3. To decide whether the Plan might have significant environmental effects (stage 8), its potential scope should be assessed against the criteria set out in Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004. The criteria from Schedule 1 of the Regulations are set out below.

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

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

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

- the probability, duration, frequency and reversibility of the effects,
- the cumulative nature of the effects,
- the transboundary nature of the effects,
- the risks to human health or the environment (e.g. due to accidents),
- the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected),
- the value and vulnerability of the area likely to be affected due to:
- special natural characteristics or cultural heritage,
- exceeded environmental quality standards or limit values,
- intensive land-use,
- the effects on areas or landscapes which have a recognised national, Community or international protection status.

3.4. Appendix 1 and 2 apply the above criteria to measure any likely significance effects on the environment arising from the Draft Gnosall NP.

### **3.5. SEA Screening Outcome**

3.6. As a result of the assessment above, it is considered unlikely that any significant environmental effects will occur from the implementation of the Gnosall NP that were not considered and dealt with by the Sustainability Appraisal of the Plan for Stafford Borough. As such the Gnosall NP does not require a full SEA to be undertaken.

## 4. HRA Screening

4.1. The box below illustrates the stages of HRA related to assessing potential impacts from planning policy documents.

<p><b>Stage 1 Screening</b></p> <ul style="list-style-type: none"><li>• Identify international sites in and around the plan/ strategy area</li><li>• Examine conservation objectives</li><li>• Identify potential effects on Natura 2000 sites</li><li>• Examine other plans and programmes that could contribute to 'in combination' effects</li><li>• If no effects are likely - report that there is no significant effect. If effects are judged likely or uncertainty exists - the precautionary principle applies, proceed to stage 2.</li></ul> <p><b>Stage 2 Appropriate Assessment</b></p> <ul style="list-style-type: none"><li>• Collate information on sites and evaluate impact in light of conservation objectives</li><li>• Consider how plan 'in combination' with other plans and programmes will interact when implemented (the Appropriate Assessment)</li><li>• Consider how the effect on integrity of sites could be avoided by changes to the plan and the consideration of alternatives</li><li>• Develop mitigation measures (including timescale and mechanisms)</li><li>• Report outcomes of AA and develop monitoring strategies. If effects remain, following the consideration of alternatives and development of mitigation measures, proceed to stage 3.</li></ul> <p><b>Stage 3 Assessment where no Alternatives and impacts remain</b></p> <ul style="list-style-type: none"><li>• Identify 'imperative reasons of overriding public interest' (IROPI)</li><li>• Identify/ develop potential compensatory measures</li></ul>
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4.2. Stafford Borough Council has carried out Stage 1 Screening on the Gnosall NP.

4.3. There are 6 European sites in Stafford borough which may be affected by policies in the Gnosall NP:

- Cope Mere RAMSAR
- Aqualate Mere RAMSAR
- Motte Meadows SAC
- Cannock Chase SAC
- Chartley Moss SAC
- Pasture fields Salt Marsh SAC

4.4. Possible effects include: water quality deterioration, eutrophication, air pollution, surface water run-off, nitrogen deposition, and increased visitor pressure.

- 4.5. The Gnosall NP includes a simple and clear Vision, based on local opinions expressed in the community survey, a set of five objectives supporting the five key issue categories which flowed from the survey findings, a new Settlement Boundary for the main village area, to encourage sustainable development within the new, defined boundary and limit development in the rural area outside it, an Environmental Proposals Plan to highlight areas of local value for policy protection and a set of Gnosall specific planning policies to supplement the Plan for Stafford Borough.
- 4.6. In combination with the Plan for Stafford Borough the Gnosall NP may affect Natura 2000 sites.
- 4.7. The Plan for Stafford Borough was subject to full Habitats Regulations Assessment including Appropriate Assessment and identification of mitigation measures. The Gnosall NP is in accordance with the Plan for Stafford Borough and does not propose anything which departs from the strategy set out in the Plan for Stafford Borough.
- 4.8. The HRA carried out on the Plan for Stafford Borough concluded that implementation of the Plan would not result in likely significant or in combination effects. As a result the Council does not consider that implementation of the Gnosall NP would result in likely significant or in combination effects on Natura 2000 sites.

#### **4.9. HRA Stage 1 Screening Outcome**

- 4.10. As a result of the assessment above, it is considered unlikely that any significant environmental effects will occur from the implementation of the Gnosall NP that were not considered and dealt with by the Habitats Regulation Assessment carried out on the Plan for Stafford Borough. As such the Gnosall NP does not require a further HRA work to be undertaken.

## **5. Consultation**

5.1. The National Planning Practice Guidance advises that the local planning authority should consult the statutory consultation bodies. The three statutory consultation bodies whose responsibilities cover the environmental considerations of the Regulations (Environment Agency, Natural England and English Heritage) have been consulted to ensure all key environmental issues have been considered. Their responses can be found in Appendix 3.

## **6. Conclusion**

- 6.1. Following screening assessments detailed in this document Stafford Borough Council does not consider further work on a SEA and HRA is necessary for the Gnosall NP to progress.
- 6.2. The consultees have provided their response and overall welcome the draft Gnosall Neighbourhood Plan and the screening assessment. The consultees do not consider further work on a SEA or HRA is necessary.
- 6.3. It is important to remember that this screening opinion is a snapshot in time and that if the issues addressed in the Neighbourhood Plan should change then a new screening opinion will need to be undertaken to determine if a SEA/HRA will be required.

**Appendix 1: The Characteristics of the Neighbourhood Plan, having regard to:**

	<b>Likely significant environmental effect?</b>	<b>Stafford Borough Council Assessment</b>
<p><b>a) The degree to which the Neighbourhood Plan sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources.</b></p>	<p>No</p>	<p>The NP sets out a vision and 5 key objectives to help deliver socio-economic growth and development within Gnosall and its surrounding rural area. In total 230 new houses are being allocated on sites at Gnosall and a further 20 across the rest of the rural area. A number of planning policies have been formulated to help deliver the vision. These policies will help:</p> <ul style="list-style-type: none"> <li>• Provide new and affordable housing developments within a new defined settlement boundary.</li> <li>• Encourage sustainable local economic growth within Gnosall and the surrounding rural area through small scale, home based businesses, and the conversion of existing buildings.</li> <li>• Provide increased residential capacity in the rural areas through barn and farm building conversions and to support creative infill development.</li> <li>• Other NP policies seek to safeguard and enhance the green space provision, designate areas of special protection.</li> </ul> <p>It is not considered that the policies and proposals in the NP will have a significant environmental effect.</p>
<p><b>b) The degree to which the Neighbourhood Plan influences other plans and programmes including those in a hierarchy.</b></p>	<p>Yes</p>	<p>The draft NP is required to conform to national policy (NPPF) and strategic policies stipulated in the Local Plan for Stafford Borough. The draft NP, if made, will form part of the Development Plan for Stafford Borough and will be used to determine planning applications within the Parish.</p>

<p><b>c) The relevance of the Neighbourhood Plan for the integration of environmental considerations in particular with a view to promoting sustainable development.</b></p>	<p>Yes</p>	<p>The NP seeks to provide a balance of social-economic and environment benefits. The NP allocates potentially 10 sites (small and large sites) for housing development within a newly defined settlement boundary over the plan period. The proposed allocations are considered to be located in sustainable locations that are accessible within the existing transport network.</p> <p>The NP will provide new and affordable housing provision.</p> <p>The plan is not allocating sites for employment, but encourages conversions and change of uses of existing buildings to support small scale business and home working within the parish and rural areas.</p> <p>The NP seeks to protect the countryside and resist development in the rural areas by encouraging conversion of barn and farm buildings.</p> <p>In relation to the natural environment, the NP seeks to safeguard and enhance open spaces by allocating open spaces as ‘Protected Open Space’; and proposes 2 sites as ‘Areas of Special Protection’ as these sites are considered of high local value.</p> <p>It is considered the draft NP will have a positive effect on the environment as it seeks to retain, enhance and protect the existing green infrastructure. The NP encourages proposals to adopt the principles of Sustainable Urban Drainage Systems (SUDS) and use innovative and low carbon design components. This is primarily achieved through NP policies, 7, 8, 9, 10 and 11.</p> <p>Furthermore, the policies require new developments to respect the local landscape features and character, and ensure development does not affect the physical characteristics of the village including the retention and enhancement of existing trees, shrubs, hedges and wildlife habitats where</p>
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		<p>possible.</p> <p>Policy SP7 in the PFSB will also protect the natural environment from any significant impacts</p>
<p><b>d) Environmental problems relevant to the Neighbourhood Plan.</b></p>	<p>No</p>	<ul style="list-style-type: none"> <li>• The draft NP area is located within a sensitive landscape including a Site of Specific Scientific Interest (SSSI); Doley Common, and Sites of Biological Interest (SBI).</li> <li>• Gnosall Parish is also within 15km of a European designated site; Cannock Chase Special Area of Conservation and several other Natura 2000 sites.</li> <li>• Other environmental concerns found in the NP area include its location within flood risks zones 2 and 3. This is largely found between the two settlements of Gnosall and Gnosall Heath.</li> </ul> <p>The NP does not include policies to protect the environment and heritage assets as these are safeguarded through detailed policies within the Plan for Stafford Borough – SP7, N4, N5 and N6.</p> <p>The NP will need to consider the inclusion of a proposed site allocated – Site 4 between Gnosall and Gnosall Heath which is adjacent to a flood risk zone 3 and carry out a flood risk assessment if necessary. For this site, the NP will need to include conditions to reduce the risk of flooding to ensure storage of disposal of surface water from the site.</p> <p>Development within the 15km radius of the European site will be expected to take necessary steps to avoid or mitigate any adverse impacts upon the SACs integrity as required by Policy N6.</p> <p>Planning applications for new housing sites that have been approved (GHD2, GHD3, GHD4) by Stafford Borough Council close to the Doley Common SSSI are accompanied with ecological and flood risk</p>

		<p>assessments.</p> <p>The ecological assessments suggest no direct impact on habitats or species present within Doley Common SSSI or the SBI sites in the local area. However the EA suggest conditions to be met to help prevent the risk of flooding.</p> <p>Transport assessments also support the permitted developments indicating no concern or constraint, given the overall increase in the number of residents in Gnosall.</p> <p>There are no Air Quality Management Areas in Stafford Borough or the Gnosall Neighbourhood Plan area.</p>
<p><b>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).</b></p>	<p>N</p>	<p>The NP is not proposing development specifically related to waste management or water management. However the NP encourages development to adopt the principles of SUDS to manage surface water and prevent risk flooding.</p> <p>Staffordshire County Council, the relevant authority for waste and minerals management, have been consulted to identify any concerns relating to waste management.</p>

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

	<b>Likely significant environmental effect?</b>	<b>Stafford Borough Council Assessment</b>
<b>a) The probability, duration, frequency and reversibility of the effects.</b>	No	There will no doubt be changes in land use in the long term that is expected to carry positive socio-economic benefits for the local community and services within Gnosall. It is considered unlikely that any detrimental environmental impacts will occur from the allocated sites of development and the policies contained in the NP.
<b>b) The cumulative nature of the effects of the Plan.</b>	No	<p>The increase of new housing developments may increase visitor levels at the SAC – Cannock Chase. However, the policies within the Plan for Stafford Borough will mitigate for any impact.</p> <p>It is not expected any other accumulative effects of the NP proposals and policies will lead to negative impacts, but result into positive impacts that will affect the Parish.</p>
<b>c) The trans-boundary nature of the effects of the Plan.</b>	No	<p>There are not expected to be any significant trans-boundary effects. New housing development will be designated within a settlement boundary over the plan period and small scale development in the rural areas.</p> <p>The NP seeks to safeguard and enhance green spaces for recreational and public use. This will bring positive community benefits for the Parish, neighbouring Parishes and Councils.</p> <p>Any significant impacts have already been assessed through a Sustainability Appraisal and Habitats Regulation Assessment to support</p>

		the PFSB.
<b>d) The risks to human health or the environment (e.g. due to accidents).</b>	No	<p>There are no significant effects to human health. The NP sets out a strategy to enhance and increase open space and recreational provision for local people to use and enable healthier lifestyles.</p> <p>Proposed sites for development are located in sustainable locations. Permitted sites are also located with access to good transport networks, accepted by Staffordshire County Council as the Highways Authority as being appropriate.</p>
<b>e) The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected) by the Plan.</b>	No	<p>The NP area relates to one of the largest Parishes in Stafford Borough, which measures around 3766 hectares.</p> <p>The NP proposes to deliver approximately 230 new dwellings in Gnosall Village and 20 dwellings in the rural area, over the plan period. This is expected to increase the current population of 4736 people living in Gnosall.</p> <p>The proposed housing developments will change the use of land from agricultural.</p> <p>230 new housing provisions will be contained within the settlement boundary and developed adjacent to existing residential areas as part of Gnosall built up area. Therefore the impacts from proposed developments are not considered detrimental.</p> <p>20 new housing provisions in the rural area will be subject to a criteria based policy to encourage sustainable development.</p> <p>Policies in the NP require developments to protect the residential amenity and character and ensure developments fit well within the existing</p>

		environment.
<p><b>f) The value and vulnerability of the area likely to be affected by the Plan due to:</b></p> <p><b>(i) Special natural characteristics or cultural heritage;</b></p> <p><b>(ii) Exceeded environmental quality standards or limit values; or</b></p> <p><b>(iii) Intensive land use and</b></p>	No	<p>The NP considers the natural and cultural characteristics of the environment including the heritage environment as highly valued assets to the community and parish of Gnosall.</p> <p>The NP includes sites of environmental and heritage importance. These are: a SSSI - Doley Common and, Sites of Biological Importance (SBI), the neighbourhood plan is also within the zone of influence of the Cannock Chase SAC and other Natura 2000 sites.</p> <p>It is not expected that the NP will have an adverse effect on these sites whilst new development should retain the existing features and landscapes where possible.</p> <p>The NP does not include policies to protect the sites of nature conservation importance because detailed policies already exist in the Plan for Stafford Borough.</p> <p>The NP area also includes a Conservation Area. However the NP does not include specific policies about the design of new development adjacent to the Conservation Area. In the Plan for Stafford Borough Policy N8 exists to ensure proposals are sympathetic to the landscape character and environment. However Policy 7 of the NP encourage proposals to respond to the local context, landscape features and reinforce local architectural distinctiveness.</p> <p>Proposals and policies of the NP allocate sites for development that will meet the housing needs of the parish. It is not expected that the proposals and policies will result in a loss of locally important open space. Open space that is regarded as high value and importance is designated as 'Protected Open Space' and Areas of Special Protection in the</p>

		<p>proposals map of the NP.</p> <p>Proposed Site 4 of the NP could be susceptible to a risk of flooding due to its location within Flood Zone 3 and near a water course. However this is expected to be a relatively small scale development where the threat of flooding is expected to be appropriately mitigated.</p>
<p><b>g) The effects of the Plan on areas or landscapes which have recognised national, community or international protection status.</b></p>	<p>No</p>	<p>It is not expected that the NP policies and proposals will have an adverse effect on the SAC, SSSI or SBI.</p> <p>The NP should consider and make reference to the landscape character and policy implications affecting proposed Site 4 as it located adjacent to a Conservation Area. Proposals for this site will need to meet the requirements of Policy N8 in the Plan for Stafford Borough.</p> <p>The application for a permitted site included in this plan, which is close to the SSSI is supported by an ecological assessments. This suggests no direct impact on habitats or species present within the Daley Common or the SBI sites in the local area.</p> <p>Overall, the NP Policy 7 encourages development to contribute positively to the built environment and enhance the landscape features and ensure it is in keeping of the existing streetscape.</p> <p>It is not expected that policies and proposals in the NP will impact on environmental sites of importance locally, nationally and internationally within and beyond the NP boundary.</p>

## **Appendix 3 – Responses from Statutory Consultees**

Hi Raj,

As requested we have reviewed the screening assessment prepared in support of the Draft Gnosall Neighbourhood Plan. We agree with the report's conclusions and do not consider further work on the SEA and HRA necessary for the plan to progress as it is unlikely to have any significant environmental impacts.

I am still awaiting comments from a consultee regarding the plan itself and as such we are unable to provide you with a detailed response on this today. However, our comments shall be submitted prior to the end of the consultation period on 22 January. I have confirmed this with Alex Yendole this morning.

Many thanks.

John Dingley

**From:** Raj Bains [<mailto:Rbains@staffordbc.gov.uk>]  
**Sent:** 12 January 2015 13:56  
**To:** Clarke, Becky; Dingley, John; [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk);  
[Antony.Muller@naturalengland.org.uk](mailto:Antony.Muller@naturalengland.org.uk); [Kezia.Taylorson@english-heritage.org.uk](mailto:Kezia.Taylorson@english-heritage.org.uk);  
[amanda.smith@english-heritage.org.uk](mailto:amanda.smith@english-heritage.org.uk)  
**Cc:** Alex Yendole  
**Subject:** FW: Draft Gnosall Neighbourhood Plan - Screening Assessment  
**Importance:** High

Hi Again

In regard to the following email I circulated last Friday, please could you email me your comments before Friday 16 January ?

Many Thanks

Raj Bains  
Stafford Borough Council  
Forward Plans Team  
Neighbourhood Planning Officer

**From:** Raj Bains  
**Sent:** 09 January 2015 12:49  
**To:** [becky.clarke@environment-agency.gov.uk](mailto:becky.clarke@environment-agency.gov.uk); [john.dingley@environment-agency.gov.uk](mailto:john.dingley@environment-agency.gov.uk);  
[consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk)  
**Subject:** FW: Draft Gnosall Neighbourhood Plan - Screening Assessment  
**Importance:** High

Dear Consultees,

Gnosall Parish Council have prepared a draft Neighbourhood Plan and is currently undergoing a pre-submission consultation.

As you are aware, a Neighbourhood Plan is required to meet the legal requirements and the basic conditions of the Neighbourhood Planning (General) Regulations 2012, if it is to proceed for independent examination and a subsequent referendum.

As part of the Basic Conditions, Neighbourhood Plans are required to be compatible with EU obligations and in practical terms expected to be screened to determine if a Strategic Environmental Assessment is required and if any significant environmental effects are likely to occur as a result of the plan.

Stafford Borough Council have prepared a detailed Screening Assessment of the draft Gnosall Neighbourhood Plan in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004; and the Habitats Regulation Assessment (HRA) in accordance with Article 6(3) of the EU Habitats Directive.

I have attached a copy of the Screening Assessment and a copy of the pre-submission draft Gnosall Neighbourhood Plan.

As a statutory consultee, please can I ask you to take a look at the draft plan and the Screening Assessment and provide me with your comments as soon as possible. The Parish Council are wanting to submit their plan for examination at the end of this month, therefore I will be most grateful if you could send me your valued feedback very soon, to allow me time to make any amendments if necessary.

Many Thanks in advance.

Kind Regards

Raj Bains  
Stafford Borough Council  
Forward Plans Team  
Neighbourhood Planning Officer

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Stafford Borough Council  
Civic Centre Riverside  
Stafford  
Staffordshire  
ST16 3AQ

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09/IS2-L01  
**Your ref:** -  
**Date:** 21 January 2015

Dear Madam

## **GNOSALL NEIGHBOURHOOD PLAN: PRE-SUBMISSION CONSULTATION**

Thank you for referring the above listed document to the Environment Agency for comment. We are broadly in support of the aims and objectives of the Gnosall Neighbourhood Plan but request that further consideration is given to the following issues.

### **FLOOD RISK**

Of the 7 sites identified in the plan as areas to accommodate potential housing growth, site 4 is at risk of fluvial flooding. This site which is earmarked for nine homes on 'land behind The Romping Cat' is shown on our indicative flood maps to be located within Flood Zone 3. Flood Zone 3 is an area of land with a 'high' probability of flooding as defined in Table 1 Paragraph 065 of the Planning Practice Guidance.

To ensure that the Neighbourhood Plan is in line with national policy, development should be steered towards areas with the lowest probability of flooding. Furthermore, Policy SP7 Part J of the Local Plan states that development will only be supported in areas that are not at risk of flooding.

It should be noted that our flood map in this location is based on a generalised modelling method, which means the floodplain at this location is indicative only. Should you wish to pursue the allocation of this site it may be worthwhile undertaking a detailed assessment of the risk at this location to more accurately define the true extent of the floodplain. This would comprise detailed hydraulic modelling of the Doley Brook which may in turn reduce the mapped flood extent and open up a larger proportion of the site for development. The development boundary could then be revised to exclude land shown to flood and the site would not be subject to the sequential test.

If no alternative sites outside the floodplain are available, the allocation of this site would need to be supported by a site-specific flood risk assessment prior to the

Neighbourhood Plan's adoption. This must demonstrate that the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible reducing flood risk overall. A detailed flood risk assessment may also be required in support of the planning application.

We therefore recommend that this site is withdrawn from the plan and alternatives outside the floodplain are considered in preference.

You should also be aware that sites 5 and 7 may be at risk of surface water flooding. The Lead Local Flood Authority (Staffordshire County Council) should be contacted for further information regarding this matter.

Overall, we consider that the risk of flooding within this locality should be given greater emphasis within the Neighbourhood Plan.

## **FOUL DRAINAGE**

The increased amount of waste water and sewage effluent produced by any new development will need to be dealt with to ensure that there is no detriment in the quality of the watercourses receiving this extra volume of treated effluent. There must also be available capacity within the sewerage infrastructure (foul sewerage network and receiving sewage treatment works) in order to accommodate this flow before any development is occupied. As such there may be a requirement for the expansion and upgrading of current sewage treatment systems and this should be discussed with Severn Trent Water at the earliest opportunity.

Surface and foul water elements should be separated on-site enabling the re-use of the 'clean' surface water element for water features, toilets etc. This will reduce the pressure on the sewerage network and ensure there is no increase in discharge quantity or deterioration in discharge quality from existing storm overflows (EOs) and combined storm overflows (CSOs) downstream of Gnosall.

It is also imperative that adequate consideration be given to the watercourses themselves. No deterioration in water quality is allowed under the terms of the Humber River Basin Management Plan and the Water Framework Directive. Wherever possible, water should be placed at the heart of a community or development – whether it is as a focal point/community area (in public open spaces etc), or a method of flood alleviation/retention/storage or treatment.

This is supported by Policy N2 of the Local Plan which states that all new development must provide adequate arrangements for the disposal of foul sewage, and surface water to prevent a risk of pollution. We therefore recommend that reference to this issue is made with the Neighbourhood Plan especially given that there is a known history of problems at Gnosall Sewage Treatment works.

## **BIODIVERSITY**

We are pleased to note that a number of environmental assets located within the Neighbourhood Plan boundary (including the Doley Common SSSI) have been identified and referenced within the document. Whilst such features are protected legally, they are also further protected by policies within the Local Plan namely Policy N5 which states that planning permission will only be granted where 'there will be no demonstrable impact on the integrity of a European site'.

We also welcome any proposals to protect, enhance and improve the natural environment. Map 6 shows a number of environmental features which are considered important locally and are to be retained. Reference should be made to Policy N4 of the

Local Plan and consideration given as to how new development in Gnosall will comply with the specific requirements of this policy.

Yours faithfully

**Mr John Dingley**  
**Planning Advisor**

Direct dia

Direct fax

Direct e-mail [john.dingley@environment-agency.gov.uk](mailto:john.dingley@environment-agency.gov.uk)

Date: 16 January 2015  
Our ref: 142027  
Your ref: n/a



Stafford Borough Council

For the attention of Raj Bains

**BY EMAIL ONLY**

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

Dear Raj

### **Planning consultation: Draft Gnosall Neighbourhood Plan - SEA and HRA screening**

Thank you for your consultation on the above dated 09 January 2015 which was received by Natural England on the same day.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

#### **Strategic Environmental Assessment – Screening**

We welcome the production of this SEA Screening report. Natural England notes and concurs with the screening outcome i.e. that no SEA is required.

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

<http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/does-a-neighbourhood-plan-require-a-sustainability-appraisal/>

#### **Habitats Regulations Assessment Screening**

Natural England notes the screening process applied to this Neighbourhood plan. We agree with the Council's conclusion of no likely significant effect upon the named European designated sites:

- Cop Mere SSSI (a component of the Midland Meres and Mosses Phase 1 Ramsar site)
- Aqualate Mere SSSI (a component of the Midland Meres and Mosses Phase 2 Ramsar Site)
- Motte Meadows SAC
- Cannock Chase SAC
- Chartley Moss SSSI (a component of the Midland Meres and Mosses Phase 1 Ramsar site and a component of the West Midlands Mosses SAC)
- Pasturefields Salt Marsh SAC

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

For any queries relating to the specific advice in this letter only please contact me on 0300 060 1640. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

Antony Muller  
Lead Adviser – Sustainable Development and Wildlife Team – North Mercia Area



ENGLISH HERITAGE  
WEST MIDLANDS REGION

The Parish Clerk  
Gnosall Parish Council  
Grosvenor Centre  
High Street  
Gnosall  
Stafford  
ST20 OEX

Our ref: 1284

Your ref:

Telephone

Fax

12 January 2015

Dear Sirs

**GNOSALL DRAFT NEIGHBOURHOOD PLAN CONSULTATION**

Thank you for your consultation and English Heritage has no adverse comments to make upon the draft plan which we feel has taken a suitably proportionate approach to the main historic environment issues pertaining to Gnosall.

We are pleased to see an emphasis on the re-use of existing buildings and on sympathetic rural conversion and diversification to achieve future sustainable uses for farm buildings. In this regard we note that there appear to be a number of historic farmsteads within the Parish and we would draw your attention to the English Heritage guidance, the Staffordshire Historic Farmsteads Project, which was produced in conjunction with the County Council. It can be accessed via the following link:

<https://www.staffordshire.gov.uk/environment/eLand/planners-developers/HistoricEnvironment/Projects/HistoricFarmsteadsandLandscapeCharacterinStaffordshireFeb2012.pdf>.

We consider that the Neighbourhood Plan should include a policy requirement for applicants for planning permission affecting historic farmsteads to demonstrate that they have made positive use of this guidance in the preparation of their detailed development proposals. Should you require more information and suggestions as to how such a policy might best be worded Debbie Taylor, the County Landscape Archaeologist, is the relevant Officer. I have copied her into the e-mail that accompanies this letter.

I hope you find this advice helpful.

Yours faithfully

Pete Boland  
Historic Places Adviser  
E-mail: [peter.boland@english-heritage.org.uk](mailto:peter.boland@english-heritage.org.uk)