

Sturminster Newton Neighbourhood Plan

Strategic Environmental Assessment Submission Stage Addendum

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1. Introduction

This addendum explains the main findings of the consultation on the Strategic Environmental Assessment (SEA) of the Sturminster Newton Neighbourhood Plan, that was undertaken at its pre-submission draft stage.

Although no further changes to the SEA are legally required at this stage, the regulations do require that, as soon as reasonably practicable after the adoption of a plan or programme for which an environmental assessment has been carried out, the responsible authority shall produce a statement setting out:

- how opinions expressed in response to the environmental report that was prepared that accompanied the consultation on the draft Neighbourhood Plan have been taken into account;
- how the environmental report and environmental considerations have been taken into account and integrated into the Neighbourhood Plan;
- the reasons for choosing the Neighbourhood Plan as adopted, in the light of the other reasonable alternatives dealt with; and
- the measures that are to be taken to monitor the significant environmental effects of the implementation of the Neighbourhood Plan.

This addendum has therefore been drafted to provide information to assist with the examination and potential adoption (or ‘making’) of the Neighbourhood Plan. It has been prepared by Jo Witherden BSc(Hons) DipTP DipUD MRTPI of Dorset Planning Consultant Ltd, on behalf of Sturminster Newton Town Council. The Town Council is the qualifying body authorised to act in preparing a neighbourhood development plan in relation to the parish of Sturminster Newton.

2. Consultation responses to the SEA of the pre-submission draft Neighbourhood Plan

Specific responses to the Strategic Environmental Assessment of the pre-submission draft Neighbourhood Plan are summarized in the following table:

Issue	Consultee	Action
Losses of biodiversity may still occur if Dorset Biodiversity Protocol is not followed.	Dorset County Council	Use of Dorset Biodiversity Protocol included in submission draft
Include NPPF reference to development securing biodiversity enhancements as well as prevent losses	Dorset County Council	This is noted in Table 2 (where Natural England had previously made this point) with confirmation that the assessment method included consideration of the potential for biodiversity gains
Recommend that reference is made to NERC Priority Species and Habitats, as well as to the Mitigation Hierarchy	Dorset County Council	The ecology walkover surveys undertaken in relation to the site specific allocations were done by a suitably qualified ecology with access to the DERC list of protected species which includes NERC Priority Species and Habitats
The SEA Report adequately evaluates the allocation sites re the significance of, and potential for impact upon, relevant heritage assets, subject to the	Historic England	North Dorset District Council were consulted at both the early options stage and also pre-submission stage. The Conservation Team provided full comments in response to the

endorsement of the endorsement of the Plan's proposed allocations from the NDDC historic environment team.		pre-submission plan proposed sites. Concerns were raised in relation to the site adjoining the Bull Tavern, and it is likely that the District Council will object to its inclusion (although the policy wording has been amended to address the issues raised as far as possible).
The SEA has had due consideration to due process, and has appropriately identified the flood risk and environmental constraint of the policies and considered the implications	Environment Agency	Noted - no further action required

In addition to the above, there were a number of additional comments made by the statutory consultees, Dorset County Council and North Dorset District Council in respect of the environmental issues potentially affected by the Neighbourhood Plan, and for completeness these are also recorded here

Issue (and pre-submission draft Policy)	Consultee	Response
General A most impressive document in its depth and scope of coverage that draws extensively on an understanding of the historic character of the area and seeks to use this constructively positively inform change and reinforce its distinctive local identity. This is the best Plan of its kind that we have seen in the south west.	Historic England	Noted
General We consider that the plan accords with the principles set out National Planning Policy and Local Plan policies	Environment Agency	Noted
General The Conservation Area is now on the national Heritage At Risk Register, and project/s to tackle the range of issues affecting the Conservation Area, with CIL funding, may be worth considering.	Historic England	Add new project regarding preparation of conservation area appraisal and management plan
Policy 6: Although aspects such as standard width of 3m is desirable there may be aesthetic / heritage considerations – the design should be informed by an understanding of the historic character of the area and streets in question	Dorset County Council Historic England	This potential conflict can usefully be discussed in the text. Amend policy and supporting text to explain that strict adherence to the standards may not always be possible, and as such key priority in policy is 'safe and convenient' with reference to conforming to current best practice
Policy 8 and 10: the Neighbourhood Plan cannot amend the "local list" but provision for locally valued heritage assets as intended	Historic England	Amend wording to refer to 'locally important building' and include project to forward the identified buildings to

Issue (and pre-submission draft Policy)	Consultee	Response
by the Plan is acceptable provided they are referred to by another term (also applies to site specific chapters)		the LPA for consideration in their Local Heritage List
Policy 11: The plan should include mention of Dorset Biodiversity Protocol as a key way of protecting and enhancing biodiversity for any development under EIA scale, and include NPPF reference to development securing biodiversity enhancements as well as prevent losses	Dorset County Council	Agreed – this is well established in Dorset but is not specifically mentioned in the adopted Local Plan. Amend policy to refer to taking into account any findings of the site’s biodiversity appraisal and mitigation plan, and highlight in the supporting text where such an appraisal is likely to be required
Policy 12: Future development at the STW, required to accommodate growth and ensure treatment standards are continued to be met, may require trees to be removed that are protected under this policy. Wessex Water will seek to retain screening wherever possible, but their retention may hinder our ability to provide improvements to the STW in the future which will be needed to support the growth of the town.	Wessex Water	Agree that replacement planting may be acceptable where retention is not feasible. Amend policy wording to allow trees to be replaced where their retention is not possible.
Omission: concerned that flood risk and drainage are only dealt with through site specific policies and suggest general criteria policy. The Plan could include information regarding known flooding concerns and use this to substantiate a general policy which might require developers to provide offsite betterment i.e. drainage improvements, flood defence measures etc.	Dorset County Council	There is no need to duplicate national or local policies that deal with flood risk, and there are no specific local issues which would suggest a need for a more bespoke policy in the neighbourhood plan. Section 4.1 makes clear that the plan should be read in conjunction with national and North Dorset planning policy.
Policy 17 / 18: generally supportive of the aspirations to improve the environment of the public realm so as to make the town centre safer and more pedestrian and cyclist friendly	Dorset County Council	Noted
Policy 23: concerned that the allocation has not considered the likely impacts of the allocation on the Great Created Newt (GCN) population based on the adjacent Butts Pond Local Nature Reserve (LNR)	Natural England	Further discussion held with Natural England to agree appropriate changes to the policy and supporting text to highlight the proper consideration of these constraints. Amend policy to refer to any further measures that may be required as part of an approved biodiversity mitigation plan, and that any proposals will need to be prepared in full consultation with Natural England, fully evaluate the importance of the area for Great Created Newts

Issue (and pre-submission draft Policy)	Consultee	Response
		and retain sufficient land to enable habitat enhancements
Policy 23: There would not be any demonstrable visual harm to any known designated heritage assets	North Dorset District Council (Conservation team)	Noted
Policy 25: Biodiversity gain may not be achieved by protecting hedges and carrying out landscaping within each development site. Dorset Biodiversity Protocol is suggested as a key way of protecting and enhancing biodiversity.	Dorset County Council	Amend bullet point to include reference to additional measures that may be required as part of an approved biodiversity mitigation plan
Policy 25: Make clearer why the site is acceptable (given previous SHLAA exclusion reasons) and confirm DCC highways has been consulted	North Dorset District Council	Background document to be submitted to provide supporting evidence DCC highways has been consulted. The reason for the site being excluded previously is the potential deviation from the prevailing single line of development along the road (which the policy precludes), visibility from surroundings (to be mitigated through landscape scheme and reduced area) and access constraints (no objection to proposals from DCC highways)
Policy 25: There would not be any demonstrable visual harm to any known designated heritage assets	North Dorset District Council (Conservation team)	Noted
Policy 28: Dorset Biodiversity Protocol is suggested as a key way of protecting and enhancing biodiversity.	Dorset County Council	Amend bullet point to include reference to additional measures required as part of an approved biodiversity mitigation plan
Policy 29: There would not be any demonstrable visual harm to any known designated heritage assets	North Dorset District Council (Conservation team)	Noted
Policy 30: There would not be any demonstrable visual harm to any known designated heritage assets	North Dorset District Council (Conservation team)	Noted
Policy 30: Half of the field is safeguarded for building stone extraction, and therefore the Mineral Planning Authority would wish to make representations on any proposal	Dorset County Council	Amend supporting text to refer to consulting the Minerals Planning Authority regarding the building stone deposits
Policy 33a: Has not been consulted on the previous odour assessment for the Elm Close	Wessex Water	Discussed further with Wessex Water to agree appropriate changes to the

Issue (and pre-submission draft Policy)	Consultee	Response
site and cannot currently verify its robustness, it is likely that further odour sampling and odour modelling may need to be carried out, particularly given the proposals to provide additional treatment capacity at the STW which will influence the odour profile of the works		plan's supporting text. Landowner commissioning new survey, which should be available prior to the examination. Remove statement "suggests that development should ... farm buildings." and clarify that the boundary between housing on the Reserve Site and the greenspace area needs to be informed by further modelling.
Policy 33a: The concept diagram (Figure 8) proposes large scale tree planting along the boundary of the Elm Close Reserve Site and Bull Ground Lane. Any development proposals should avoid narrowing the existing track to allow larger vehicles to continue to be able to access the STW.	Wessex Water	Add the continuing need for access by larger vehicles to the sewage treatment works to list of traffic considerations, and include Wessex Water as a consultee for the transport assessment
Policy 33/33a: Dorset Biodiversity Protocol is suggested as a key way of protecting and enhancing biodiversity.	Dorset County Council	Amend bullet point on wildlife mitigation to include reference to additional measures required as part of an approved biodiversity mitigation plan
Policy 33/33a: There may be impact on below ground archaeological assets which may act as a constraint and need to be further investigated.	North Dorset District Council (Conservation team)	This is noted in the supporting text. Include requirement for below ground archaeological investigation in the policy
Policy 41: Concerned that the allocation has not fully considered the wildlife interests of the site. Dorset Biodiversity Protocol is suggested as a key way of protecting and enhancing biodiversity.	Dorset County Council, Natural England	Further discussion held with Natural England to agree appropriate changes to the policy and supporting text to safeguard the site's ecological interest. Amend bullet points in policy to reflect the need for a landscape and biodiversity scheme to achieve overall biodiversity benefits as set out in an approved biodiversity mitigation plan
Policy 41: Policy should include due consideration of flood risk – in particular access and egress must be designed to be operational for changing circumstances over the lifetime of the development in liaison with the County Council's Emergency Planners	Environment Agency	Amend first bullet point of policy to clarify that the access should be safe in the event of flooding, and clarify in supporting text the need for this to be addressed to the satisfaction of the County Council's Emergency Planners
Policy 41: There is limited opportunity for development in this location and careful control of scale, design and layout would be required so as not to detrimentally harm the	North Dorset District Council (Conservation team)	Further evidence was obtained on the setting and significance of the heritage assets, however these finding were disputed by the Conservation team.

Issue (and pre-submission draft Policy)	Consultee	Response
special character and interest of this Conservation Area, richly populated with heritage assets		The option of deleting the allocation was considered, but not favoured in that there was a need to improve the Bull's accommodation and offer if it were to function successfully as a pub in the long term, and the only reasonable and available site to enable this was the land in question. If development were justified it would therefore be better to provide more detailed guidance on the main issues through the Neighbourhood Plan. The Plan was therefore amended to include reference to heritage importance of historic chapel / keepers cottage in the supporting text and add to list of Locally Important Buildings. Amend policy to clarify the status as enabling development related to the future of the pub (as a Listed building) and include reference to the layout and design should not cause substantial harm to the setting or significance of the nearby heritage assets
Policy 42: There would be limited, if any, opportunity for development in this location due to the significant heritage constraints on the site	North Dorset District Council (Conservation team)	Further evidence was obtained on the setting and significance of the heritage assets. Policy amended to include reference to Conservation Area

Based on the feedback received it is not considered that the assessments of the policies would change significantly. The cultural heritage impact 'score' for Policy 39 Land adjoining the Bull Tavern (Policy 41 in the pre-submission draft) could arguably be reassessed as 'significant adverse impact likely', however the policy wording has been revised to include a criteria that the design and layout would not cause substantial harm to the setting or significance of the nearby heritage assets.

3. How the SEA has been taken into account

The production of the Neighbourhood Plan alongside the SEA was an iterative process, allowing issues highlighted through the SEA process to be included in the policy drafting, and clarity on what environmental checks were undertaken to inform the plan.

In particular, the SEA:

- Highlighted the need to focus on assessing the site allocations, where there was likely to be the greatest impacts across a range of environmental issues
- Ensured that ecological walkover surveys were undertaken for the main allocated sites, in order to properly inform their suitability for inclusion and highlight mitigation measures.
- Highlighted that the main issues of the proposed site was the loss of farmland in general (although it is unlikely that any of sites would be Grade 1 or 2 agricultural land), and the

potential negative landscape impact of developing land at Yewstock Field, the reserve site off Elm Close and the landscape and heritage impact of developing the site adjoining the Bull Tavern. The loss of productive farmland cannot be avoided - there are not enough brownfield sites available. Criteria were included in all the site specific policies to mitigate any potential adverse impacts.

4. Consideration of reasonable alternatives

The focus on the assessment of reasonable alternatives was on the proposed site allocations. As explained in the SEA, alternative sites were identified from the District Council's Strategic Housing Land Availability Assessment, and both included and excluded SHLAA sites were reviewed.

In most other cases the fall-back position was accepted to be having no policy (and therefore the Local Plan policies would prevail, which had been subject to their own sustainability appraisal and formed the 'baseline' for assessing the impact of the policy).

The SEA provided reassurance that most of the policies should result in positive environmental impacts overall, particularly compared to having no Neighbourhood Plan in place. It showed that the cumulative impact should also be beneficial. It also demonstrated that the potential alternatives site allocations were not likely to be favourable in terms of their potential environmental impacts.

5. Monitoring measures proposed

Section 11 of the SEA suggests a number of existing monitoring measures that could be adapted to provide more bespoke monitoring of the plan – namely

- Loss of agricultural land and buildings to other use per annum

- Overall provision of new dwellings

- Number of affordable homes approved per annum

- Amount of primary town centre retail frontage lost per annum

- % and number of vacant premises in town centres per annum

- Length of Trailway available for use

- Amount of community building floorspace

- Number of community facilities lost per annum

- Amount of new formal and informal open space provided within settlements

- Number of new allotment plots provided

In addition it is proposed the improvement of existing key pedestrian and cycle routes and provision of new links (in addition to the Trailway) is monitored, and this is something the Town Council could support the District Council in assessing.