

Motcombe Neighbourhood Plan

Strategic Environmental Assessment (SEA) Screening Determination Statement

29 January 2019

This statement has been produced to comply with Regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004.

The Regulations implement European Directive 2001/42/EC. This requires that the effect on the environment of certain plans and programmes should be assessed, including plans prepared for town and country planning or land use. An exception is made for plans that determine the use of a small area at a local level if it has been determined that the plan is unlikely to have significant environmental effects.

A Strategic Environmental Assessment and Habitats Regulations Assessment Screening Report for the Motcombe Neighbourhood Plan was submitted in November 2017 (see Appendix A). The report was accompanied by contaminated land advice from NDDC, flooding advice provided by DCC, and a heritage assessment produced by local consultant Kevin Morris Heritage Planning.

The Screening Report takes into account the criteria specified in Schedule 1 of the Regulations. Its draft findings were: *"The plan is unlikely to have a significant effect on the environment, and the proposed screening opinion (draft) concludes that the SEA Directive does not require a Strategic Environment Assessment for the Motcombe Neighbourhood Plan."*

On 7 December 2017 the Screening Report was made available to the statutory consultation bodies (Historic England, Natural England and Environment Agency). The District Council received responses from all of the statutory consultation bodies by 19 January 2018 (see Appendices B, C and D).

In assessing whether an SEA is required, NDDC considers the following to be a summary of the key issues:

1. Proposals for growth in the Neighbourhood Plan as indicated by the draft vision and objectives will be of a limited scale, in line with Motcombe's position as a 'Larger Village' in the Spatial Strategy set out in the Local Plan Part 1 (adopted January 2016). The Screening Report states: *"Initial appraisal of housing need based on a pro-rata estimate of the rural settlements target suggests that the 'fair share' of housing for Motcombe for 2011–2031 would be about 56 dwellings, or 65 dwellings if the uplift from the 2015 SHMA is factored into the calculations."*
2. Policy 2 ('Core Spatial Strategy') of LPP1 states: *"Stalbridge and the eighteen larger villages have been identified as the focus for growth to meet the local needs outside of the four main towns."* Policy 6 ('Housing Distribution') of LPP1 states: *"At least 825*

dwellings will be provided in the countryside (including Stalbridge and the villages) during the period 2011–2031.” LPP1 does not disaggregate the 825 dwelling figure. However, the scale of growth being considered at Motcombe (56–65 dwellings) appears to be within the realms envisaged by LPP1. Over a 20-year timeframe, this equates to approximately 3 dwellings a year and would be in-line with Motcombe’s role as a focus for growth to meet local needs.

3. The Screening Report identifies a comprehensive range of spatial constraints. These include landscape, bio- and geo-diversity assets, heritage assets, agricultural land value, pollution risks, minerals and waste proposals, and flood risk and water quality.
4. In order to avoid either causing harm to existing assets, or placing occupants of new development at unnecessary risk, the Screening Report considers all potential development sites against the spatial constraints. It advised that in order to meet the neighbourhood plan objectives and avoid environmental harm, the list of potential development sites would be limited to the following (SHLAA reference number in brackets):
 - Site 1 – Land opposite Church Farm (2-41-0528) – Note, this was reduced in size to exclude the area to the rear and east of Barcroft / Woodside.
 - Site 2 – Church Farm Barns (2-41-0398)
 - Site 4 – Beside Shire Meadows, Motcombe Road (2-41-0408)
 - Site 13 – Shorts Green Farm, The Street (2-41-0407)
 - Site 18 – Elm Hill (SE), Knapp Hill (2-41-0004 and 2-41-0011)
 - Site 20/21 – Elm Hill (SW), west of Highfields (2-41-0439 and 2-41-0441)
 - Site 24 – Rear of Stainers Mead (2-41-0435)
 - Site 25 – The Nursery, The Street (2-41-0006)
5. The Environment Agency responded to say that they agreed with the conclusion that the plan is unlikely to have a significant effect on the environment (see Appendix B).
6. Natural England pointed out that Site 4 is within 500m of Fishy Mead SNCI, which is not reflected in the information provided within the SEA screening report. That aside, they concluded *“the allocations in the neighbourhood plan do not pose significant concern for Natural England in terms of their impact on the environment,”* and *“there are unlikely to be significant environment effects from the proposed plan.”* (see Appendix C).
7. Historic England stated in their response that they found the information supplied to be “most helpful”, and on that basis only raised concerns over Site 1. Notwithstanding the fact that the size of Site 1 was reduced in order to reduce its potential impact, Historic England stated: *“we are not sure there is enough information to be able to conclude that an SEA is not required”*, and concluded: *“it seems difficult to arrive at an acceptable scenario capable of avoiding the need for SEA if only on a default basis.”* (See Appendix D.)
8. The Motcombe Neighbourhood Plan Group were made aware of the responses from the consultation bodies, and in particular the concerns raised by Historic England with respect to site 1. As a result, the Group resolved that they would exclude Site 1 as a potential development site (email to NDDC dated 26 Feb 2018).
9. A full consideration of the proposed plan against the criteria set out in Schedule 1 of the Regulations is set out on pages 18 to 20 of the Screening Report (Appendix A).

Having considered the contents of the Screening Report, the responses from the consultation bodies, and taking into account the criteria specified in Schedule 1 to the regulations, **North Dorset District Council has determined that an SEA of the**

Motcombe Neighbourhood Plan is not required providing site 1 continues to be excluded from further consideration as a potential development site.

NOTE: The statement is based on the information provided. If the contents of the plan are revised and/or there is a material change in the environmental characteristics in the locality (e.g. the designation of any additional nature conservation or other environmental sites), then the comments contained in this statement would need to be reconsidered in order to take account of the changes.

Habitats Regulations Assessment

Schedule 2, paragraph 1 of the Neighbourhood Planning (General) Regulations 2012 sets out the prescribed basic condition that the making of a neighbourhood plan is not likely to have a significant effect on a European site (as defined in the Conservation of Habitats and Species Regulations 2012) or a European offshore marine site (as defined in the Offshore Marine Conservation (Natural Habitats, &c.) Regulations 2007) (either alone or in combination with other plans or projects).

The District Council has consulted Natural England as to the requirement for a habitats regulation assessment. Natural England's response stated:

Motcombe Parish is approximately 3.5km from the nearest European Designated site, Fontmell & Melbury Downs SAC. As per our previous response to the SEA screening request, it is Natural England's opinion that the Neighbourhood Plan is unlikely to harm any Special Area of Conservation (SAC) and is unlikely to significantly affect the interest features for which they are notified. As such we agree with your Authority's conclusion that a HRA is not necessary in this case.

Based on these facts, North Dorset District Council has determined that the proposed neighbourhood plan is not likely to have a significant effect on a European site, and therefore **an HRA of the Motcombe Neighbourhood Plan is not required.**

APPENDICES

A. Motcombe Neighbourhood Plan – Screening Report (November 2017)

SEA Statutory Consultation Bodies Responses

B. Natural England – email dated 17/01/2018

C. Environment Agency – letter dated 19/01/2018

D. Historic England – email dated 19/01/2018

E. Natural England – email dated 24/01/2019

Appendix A

STRATEGIC ENVIRONMENTAL ASSESSMENT AND HABITATS REGULATIONS ASSESSMENT **SCREENING REPORT**

MOTCOMBE NEIGHBOURHOOD PLAN

Prepared on behalf of Motcombe Parish Council

NOVEMBER 2017

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1 INTRODUCTION

LEGISLATIVE REQUIREMENTS

Government guidance¹ recognises that where a neighbourhood plan is likely to have significant environmental effects, it may require a strategic environmental assessment in accordance with the SEA Directive².

Draft neighbourhood plan proposals should therefore be assessed at a reasonably early stage to determine whether the plan is likely to have significant environmental effects. A “screening” assessment is the process for doing this, and the process for this is outlined in **Appendix 1**. If likely significant environmental effects are identified, an environmental report must be prepared³. If the need for such an environmental assessment has been screened out, then a statement of reasons for this determination should then be prepared and submitted as part of the evidence supporting the neighbourhood plan⁴. The key stages up to submission are outlined in **Appendix 2**.

Before making a final decision as part of the screening process, Natural England, Historic England and the Environment Agency are consulted. Their responses will be considered and any necessary changes made prior to the final decision being made on the screening, which will be made available to the public.

There are other European directives that may also be of relevance to neighbourhood plans, such as **Directive 92/43/EEC** on the conservation of natural habitats and of wild fauna and flora and **Directive 2009/147/EC** on the conservation of wild birds (often referred to as the Habitats and Wild Birds Directives respectively) which aim to protect and improve Europe’s most important habitats and species. If an SEA is not required it is highly unlikely that the need for more detailed assessments under these directives will be required. The Waste Framework Directive (2008/98/EC), Air Quality Directive (2008/50/EC) or the Water Framework Directive (2000/60/EC) may apply in particular circumstances.

THE NEIGHBOURHOOD PLAN

The Motcombe Neighbourhood Plan area was designated by North Dorset District Council in February 2016. It follows the parish boundary, as shown in Figure 1.

The parish lies between the towns of Gillingham and Shaftesbury, covering an area of just under 20 square kilometres. The two towns are connected by the B3081, and the village of Motcombe is about 1 mile off this road.

At the time of the 2011 Census there were 1,474 people living in Motcombe parish, forming 564 households in a parish of 611 dwellings. This includes pupils normally resident in Port Regis School (which provides boarding for over 200 children aged seven to 13 years).

The parish is in Motcombe and Ham ward (in North Dorset 002F LSOA) and is amongst the 30% least deprived neighbourhoods in the country. The village has a good range of facilities, including a village shop, primary school, village hall and

¹ www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal

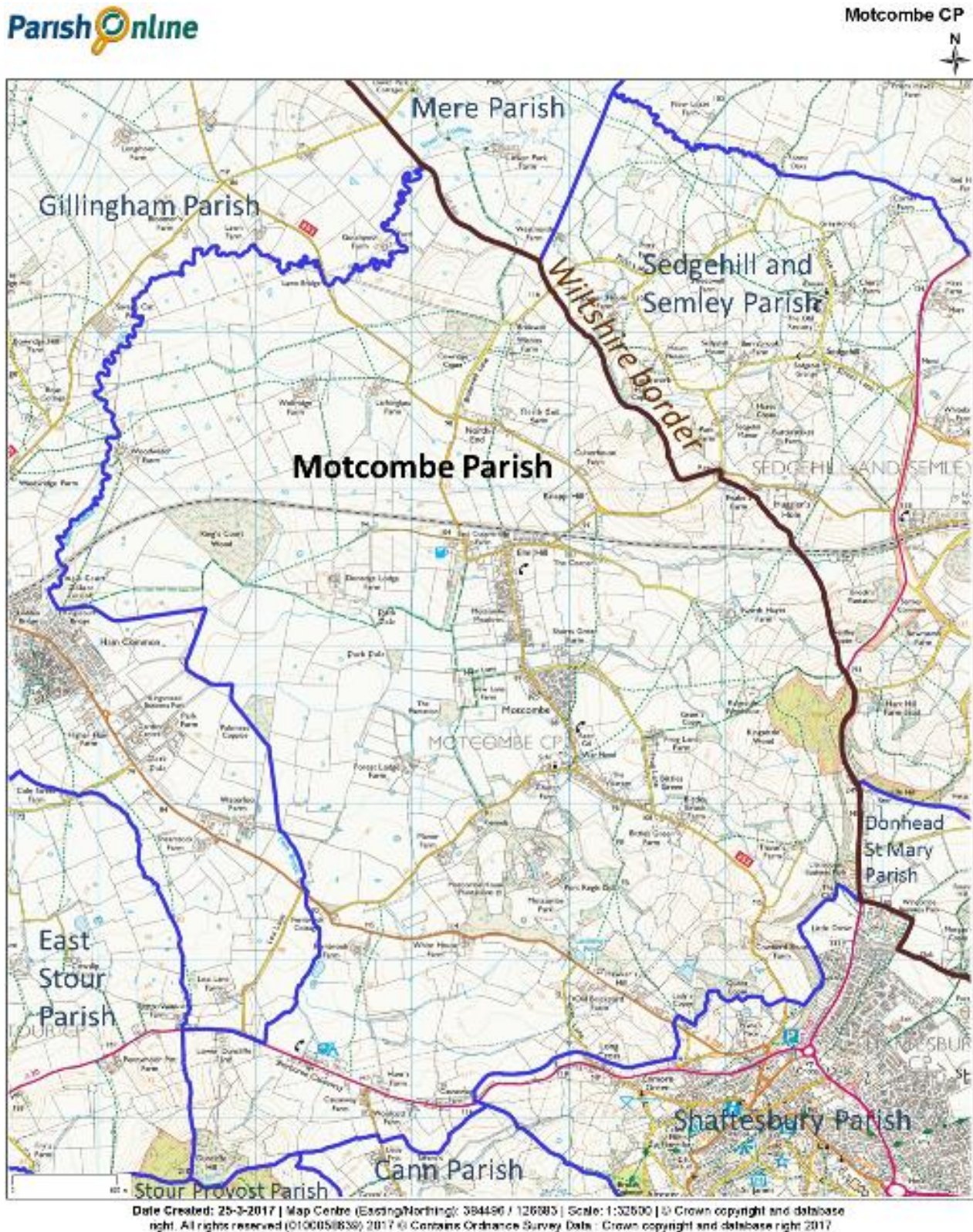
² Directive 2001/42/EC

³ Environmental Assessment of Plans & Programmes Regulations 2004

⁴ The Neighbourhood Planning (General) Regulations 2012, as updated in January 2015

playing fields. Of those working, just under a quarter (23%) are self-employed (which is fairly typical for North Dorset) and about half (51%) work at home or within 5km of home.

Figure 1: the Motcombe Neighbourhood Plan area



2 NEIGHBOURHOOD PLAN PROPOSED SCOPE

THE LOCAL PLAN CONTEXT

The North Dorset Local Plan Part 1 was adopted in January 2016. Of particular relevance was the modification that retained settlement boundaries and set a rural housing target for Stalbridge and the larger villages⁵ of 41dpa (dwellings per annum). Motcombe was one of the settlements who retained a settlement boundary, and is therefore anticipated to support some level of growth to meet local needs, appropriate to its status as a larger village. The need for an early review of the Local Plan was also stipulated, given that the need for housing in the wider housing market area (including the Poole / Bournemouth conurbation) was not based on the most recent population projections and guidance.

The Local Plan recognises that through Neighbourhood Plans, local communities can decide whether they want to lead on defining sites for development and reviewing detailed policies. A number of areas are specifically highlighted as issues that could be usefully considered through the Neighbourhood Plan process. The overall message being that the Neighbourhood Plan can help a community explain its "vision" and objectives for the area, identify local needs that should be met and consider options to meet these needs. Changes to policies could include:

- Reviewing the settlement boundary or establishing a new settlement boundary
- Allocating sites for development
- Developing more detailed policies relating to infilling
- Considering proposals for heritage-led regeneration
- Including proposals for the reuse of buildings in the countryside
- Addressing the provision and retention of community facilities
- Reviewing the Important Open and Wooded Area (IOWA) designations
- Designating areas as a Local Green Space
- Identifying non-designated heritage assets
- Influencing what new buildings should look like, through local guidelines on character

PROPOSED SCOPE

The overall vision for the Motcombe Neighbourhood Plan has been drafted as follows:

To keep Motcombe as a separate and distinct, village-based community, rather than it becoming a dormitory suburb of the neighbouring, rapidly expanding towns, of Shaftesbury and Gillingham.

The objectives for the Neighbourhood Plan to achieve this vision...

HOUSING

Ensure housing needs are met at a level that reflects the amount of new homes required by the Local Plan, and specific needs identified through local evidence. The house types should suit people of different ages and abilities, so that the mix of

⁵ The 18 'larger villages' range in population from just over 500 (Winterborne Stickland) to just under 2,000 (Marnhull), with Stalbridge having a population of about 2,750.

people living here is well balanced. New housing, when it is built, should be in small scale incremental developments that reflect the village character and its linear nature, rather than suburban-style estates.

Initial appraisal of housing need based on a pro-rata estimate of the rural settlements target suggests that the 'fair share' of housing for Motcombe for 2011 – 2031 would be about 56 dwellings, or 65 dwellings if the uplift from the 2015 SHMA is factored into the calculations. Of this, 14 dwellings have either been completed or consented.

Given the absence of a Conservation Area Appraisal or village design guidance, further research is planned to identify locally important buildings of character which provide good examples of Motcombe character or are otherwise significant in the history of the area, and establish key characteristics of the built environment – styles, materials, layouts etc which contribute to the 'Motcombe feel'. Initial technical input on possible heritage impact of possible development sites has also been sought at an early stage.

GREEN SPACES

Protect the important green spaces within the parish that are valued by local residents. Retain the essential rural character of the village, and improve the level of access into, and visual links with, the surrounding countryside.

Further work is planned to identify and assess the locally important green spaces and other important landscape attributes – views, woodland cover etc

AMENITIES

Support the range of important amenities, such as the local shop and Post Office, Memorial Hall, schools, churches – and the activities provided through these amenities, which provide the basis for the strong community spirit and help meet many day to day needs of local residents.

Initial discussions with local service providers have not identified a need to allocate additional land for community buildings.

EMPLOYMENT

Support existing and new businesses within the parish, including those run from home, that are compatible with the rural village character of the area.

Initial discussions with local businesses have not identified a need to allocate employment land, although there may be some limited demand from householders who would consider setting up a new business, or re-locating an existing business to Motcombe if there were opportunities to do so.

TRAFFIC, ROADS AND TRANSPORT

Ensure that additional traffic from development can be safely accommodated on the rural road network, and that opportunities are taken to support public and community transport options, improve footpaths and cycleways, and make roads safer, in ways that are compatible with the rural village character of the area.

Maintenance works were undertaken on local roads during Summer 2017 which have improved these greatly. Evidence is to be gathered on the main commuting patterns and current use of cycle / bus and possible transport network improvements.

3 POTENTIAL ENVIRONMENTAL ISSUES

The significance of the effect of a Neighbourhood Plan on the environment does depend on the proposals within the plan, and the environmental sensitivity of the area. In appraising the need for a Strategic Environmental Assessment, the environmental problems relevant to the plan area, together with the value and vulnerability of the area likely to be affected due to:

- > the effects on areas or landscapes which have a recognised national, or higher levels of protection
- > special natural characteristics or cultural heritage,
- > exceeded environmental quality standards or limit values, and intensive land-use

all need to be taken into account. The following therefore provides an overview of the potential environmental issues relevant to Neighbourhood Plan area.

Unless reproduced, [links](#) to maps showing the extent of coverage are provided, where available.

LANDSCAPE QUALITY

The Plan area sits mainly within the clay vales associated with Blackmore Vale and the more rolling vales of North Blackmore (source: 2008 Landscape Character Assessment produced by North Dorset District Council). Within this transition key characteristics include

- > a tranquil, peaceful and unified landscape
- > mosaic of woods, straight hedgerows and grassland fields 'dotted' with distinctive mature hedgerow Oaks, with more irregular pattern of farmland, fields, dense hedgerows and copses further east
- > open views across the pastoral landscape to the chalk escarpment backdrop, which is an important feature
- > twisting hedge lined lanes with grass verges and sharp double bends
- > network of ditches, streams and brooks
- > use of locally distinctive building materials, mainly stone, redbrick, tile and thatch, adding to character.

The character assessment also notes that the settlement edges of Motcombe create a hard, urban edge in this area.

The Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty covers the eastern edge of the plan area and this part lies within the Shaftesbury Greensand Ridges landscape. Within this landscape key characteristics include

- > dominance of the historic hilltop setting of Shaftesbury (though this is not as notable on the northern edge of the town)
- > open and wide views from the wooded hills and ridges, transitioning to meadows on the valley floors
- > a tranquil and intimate landscape
- > network of ancient sunken hedge lined lanes
- > small scale pattern created by irregularly shaped hedge-lined fields
- > locally distinctive buildings materials especially stone

There is an extensive network of public rights of way criss-crossing the area, but no registered commonland or open access land.

<http://explorer.geowessex.com/?layers=51,4785,10986,4765,48&basemap=26&x=384660.71&y=126493.52&epsg=27700&zoom=13>

The area generally enjoys dark skies but is notably impacted by the proximity to Gillingham and Shaftesbury

<http://nightblight.cpre.org.uk/maps/print.html?0|5089.89,5238.790236417366,5410.45,5510.221998956505,0|thBl=1,th0=0,th1=0,th2=0,th3=0,th4=0,th5=0,th6=1,th7=0,th8=1||thBl=OpenStreetMap>

BIODIVERSITY AND GEODIVERSITY ASSETS

There are no nationally designated wildlife sites within the plan area. Breach Fields SSSI lies to the South (part on Shaftesbury and part in Cann Parish, just over 200m from the parish boundary) and Gutch Common SSSI lies about 2km to the east in Sedgehill and Semley parish.

There are no locally important geological sites in the parish.

There are areas of ancient woodland within the parish, but not in close proximity to the main built up area.

Sites of local nature conservation importance are to be considered when details have been obtained from the Dorset Environmental Records Centre. There are no SNCIs shown on the 2003 Local Plan map within 500m of the current settlement boundary.

HERITAGE ASSETS

There are 32 Listed buildings or structures within the neighbourhood plan area, many of which lie within the conservation area. The most notable of the Listings being the Grade II* Church Of St Mary and the Grade II* North End Farmhouse (to the north of the mainline railway). The remainder are Grade II.

Gillingham Park boundary bank and King's Court Palace moated site (on the edge of Gillingham) are scheduled monuments. A number of unscheduled monuments are noted, including former orchards associated with the village (many of which have been developed).

Although not designated as a whole, the parish sits within what was the Gillingham Royal Forest, and at the current time a potential project is being explored to:

- Increase public awareness about the history of the Gillingham Royal Forest.
- Provide opportunities for "Royal Forest" base attractions such as arts and cultural venues/events, sports and environmental engagement.
- Investigate the location for a circular bridle route from Gillingham to Motcombe
- Reinstate historical walks which link to the "Royal Forest" (Cleare Walke, Lawne Walke, Woodes End Walke)
- Set up environmental and cultural champions (volunteer groups) such as River Champions, Veteran Tree Surveyors etc

There are no registered historic parks or gardens in or close to the area, or locally listed parks or gardens.

There are no heritage assets on the national 'at risk' register. The local register⁶ (last updated 2013) records the following as at risk:

⁶ https://www.dorsetforyou.gov.uk/media/170776/Buildings-at-Risk-Register-2013-A-R/pdf/Buildings_at_Risk_2013_A-R.pdf

- The Threshing Barn, Larkinglass Farm (Grade II Listed) - the 2013 register records that the owner's intend to seek planning permission to convert this into a dwelling (though this has not yet been done)
- Cole Court, Port Regis School (Pre-prep and nursery building) two-storey barn (unlisted but potentially curtilage Listed by association to Grade II Motcombe House), part of a 4-sided former stable yard with courtyard, used for storage.
- Fernbrook Cottages, Shaftesbury Road (unlisted) - Pair of 19th century cottages (date of 1866 engraved into front gable stone). An application (ref 2/2016/1320) to replace these dwellings was refused 21/11/16 due to proposed increase in size being harmful to the character and appearance of the area

AGRICULTURAL LAND VALUE

The farmland is mainly Grade 3 (moderate) to Grade 4 (poor) quality across the parish.

POLLUTION RISKS

There are two historic landfill sites recorded by the Environment Agency for the area:

- Forest Lodge, off Turnpike Road
- Manor Farm, off Turnpike Road

There are fewer than 60 sites in Motcombe parish on the contaminated land register held by North Dorset District Council (fairly typical for an area of this size). Those closest to the village generally relate to unknown filled ground and previous business / factory-type uses.

The eastern edge of the parish, running from Kingsettle Wood south to the edge of Shaftesbury, lies within a nitrate vulnerability zone, a small part of which is also part of a groundwater source protection zone.

There are no Air Quality Management Areas in the area.

<http://apps.environment-agency.gov.uk/wiyby/default.aspx>

MINERALS AND WASTE PROPOSALS

There is a small area subject to minerals safeguarding on the eastern edge of the parish, running from Kingsettle Wood south to the edge of Shaftesbury.

A site at Enmore Green, south of the Shaftesbury Road and Hawkers Hill, was identified as a potential option for a household waste recycling option, but is not the preferred option.

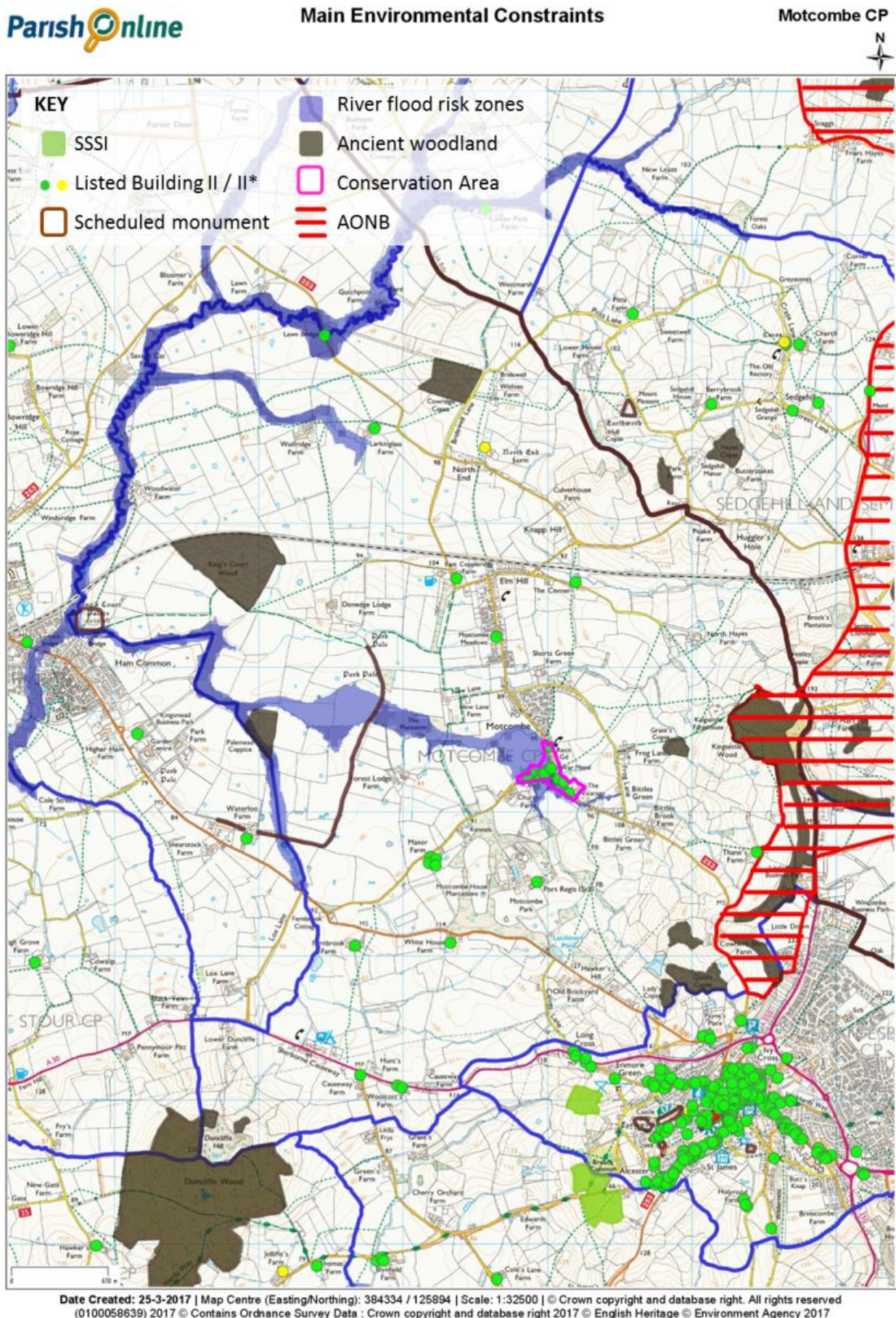
<https://www.dorsetforyou.gov.uk/article/419382/Preparing-the-new-Waste-Plan>

FLOOD RISK AND WATER QUALITY

The main area at risk from flooding relates to the tributaries of the Lodden, which particularly impacts on the historic core of the village, with surface water flooding also noted in the area around Shorts Green Farm and off The Street / Stainers Mead.

<http://explorer.geowessex.com/?layers=9866,9865,9426,9425,9427,51&basemap=26&x=384789.01&y=125989.49&epsg=27700&zoom=15>

Figure 2: Map of main environmental constraints



SUMMARY OF MAIN ENVIRONMENTAL ISSUES IDENTIFIED

Landscape

The Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty covers the eastern edge of the plan area. Major of insensitive development within the AONB or affecting its setting is likely to impact on this nationally important landscape.

Biodiversity, Flora and Fauna

No significant issues identified.

Cultural Heritage

There are three buildings on the local 'at risk' register, one of which is Grade II Listed. There are a range of heritage assets (including Grade II* Listed buildings and the Motcombe Conservation Area) that could be harmed by development. Opportunities to enable improvements to the 'at risk' properties should be considered. Development that would harm any heritage asset (including their setting) should be avoided, with any assessment taking into account their significance and level of harm.

Soil, Water and Air

There are no known issues relating to exceeded environmental quality standards or limit values. The contaminated land register holds records of potentially contaminated land within the parish generally relating to unknown filled ground and previous business / factory-type uses where pollution may have occurred.

Climatic Factors

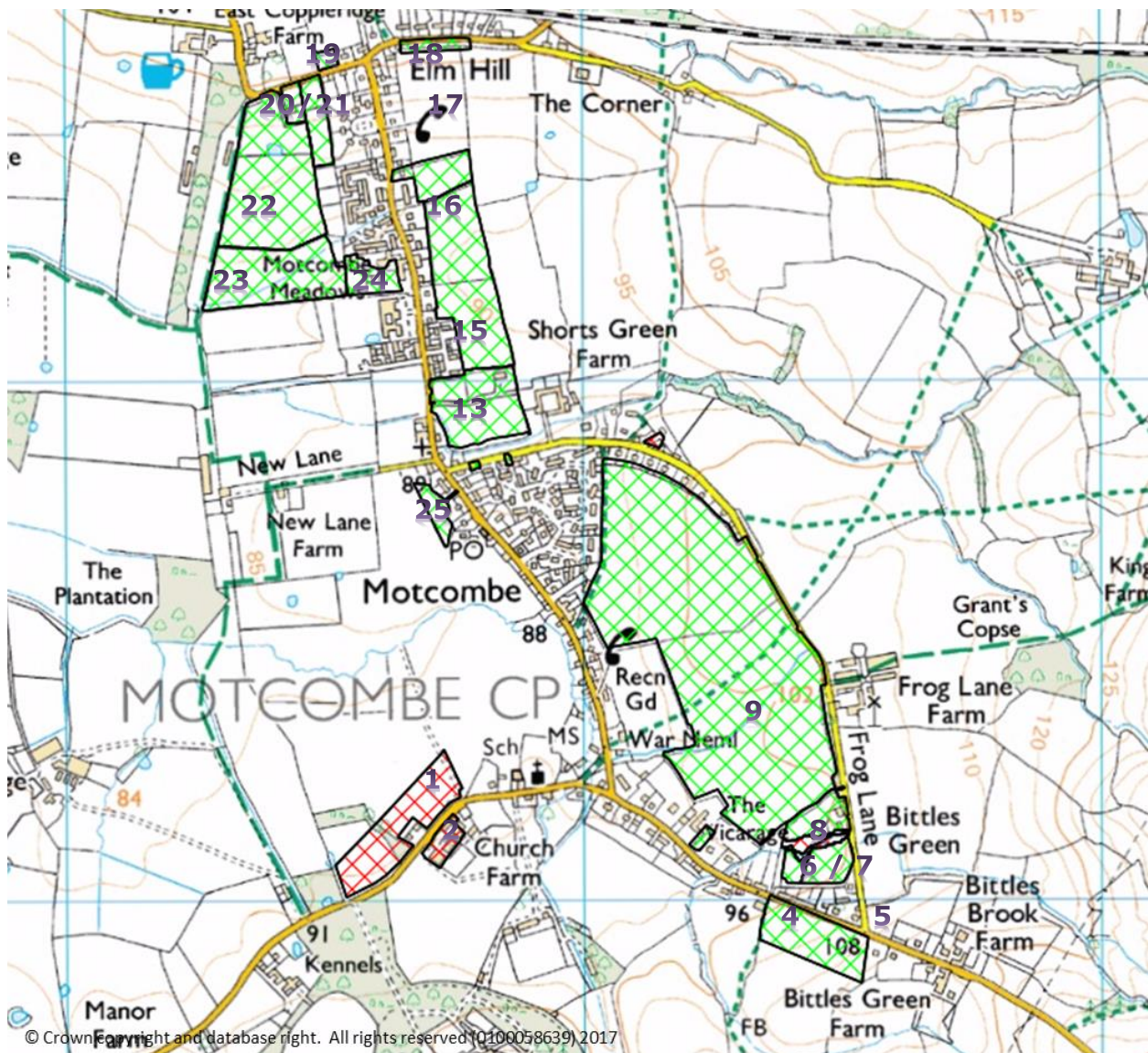
There are areas at risk from flooding relating to the tributaries of the Lodden (this particularly impacts on the historic core of Motcombe village), and areas of surface water flooding (in relation to the village these are noted in the area around Shorts Green Farm and off The Street / Stainers Mead). Vulnerable development (such as new housing) within these flood risk areas should be avoided.

4 SITE ALLOCATIONS

SITE OPTIONS SELECTION

The District Council’s Strategic Housing Land Availability Assessment identifies more than 20 parcels of land around the village of Motcombe as available for development, the majority of which were judged by the District Council following their checks to be acceptable and deliverable.

A small area off Frog Lane was ruled out on the grounds of potential flood risk, and the two sites around Church Farm were considered inappropriate due to being “away from main part of village”. As the latter is not an absolute constraint, the sites around Church Farm have been considered for the Neighbourhood Plan.



The District Council also provided details of two further sites put forward through the 2016 call for sites (land NE corner Frog Lane and land south of Elm Hill).

STAGE 1 – ASSESSMENT AGAINST NEIGHBOURHOOD PLAN OBJECTIVES

Based on the emerging Neighbourhood Plan objectives the following criteria were used by the Neighbourhood Plan group to rank the sites, to be tested further through an options consultation stage:

- 1. Strengthening the village character:** the site (in whole or part) could be developed in a form that appears as an incremental, organic scale of growth in keeping with the village character (as opposed to larger urban estate style development)
- 2. Reinforcing the compact form of village:** the site is well related to the built-up area of the village and would not extend its general spread beyond the existing limit of development or breach significant boundaries
- 3. Retaining green spaces and key views:** the site does not form an important green space, and its development would not result in the loss of an important view from a public area or highway to the wider countryside
- 4. Promoting a walkable village:** most of the main amenities (Village Shop, School, Memorial Hall / playing fields and Motcombe Meadows), are within 800m walking distance of the site entrance, and the pedestrian routes would or could be made safe
- 5. Minimising the risk of traffic accidents:** the traffic that would be generated by the site is not likely to create or exacerbate traffic problems, based on the location and likely access
- 6. Promoting a working environment:** the development is likely to be well served by mobile and broadband coverage to allow working from home, taking into account current and planned availability

As a result of this initial assessment, the following sites were considered to not provide 'reasonable alternatives' as they failed to score well against a significant number of the above objectives, either as a whole or if reduced in size.

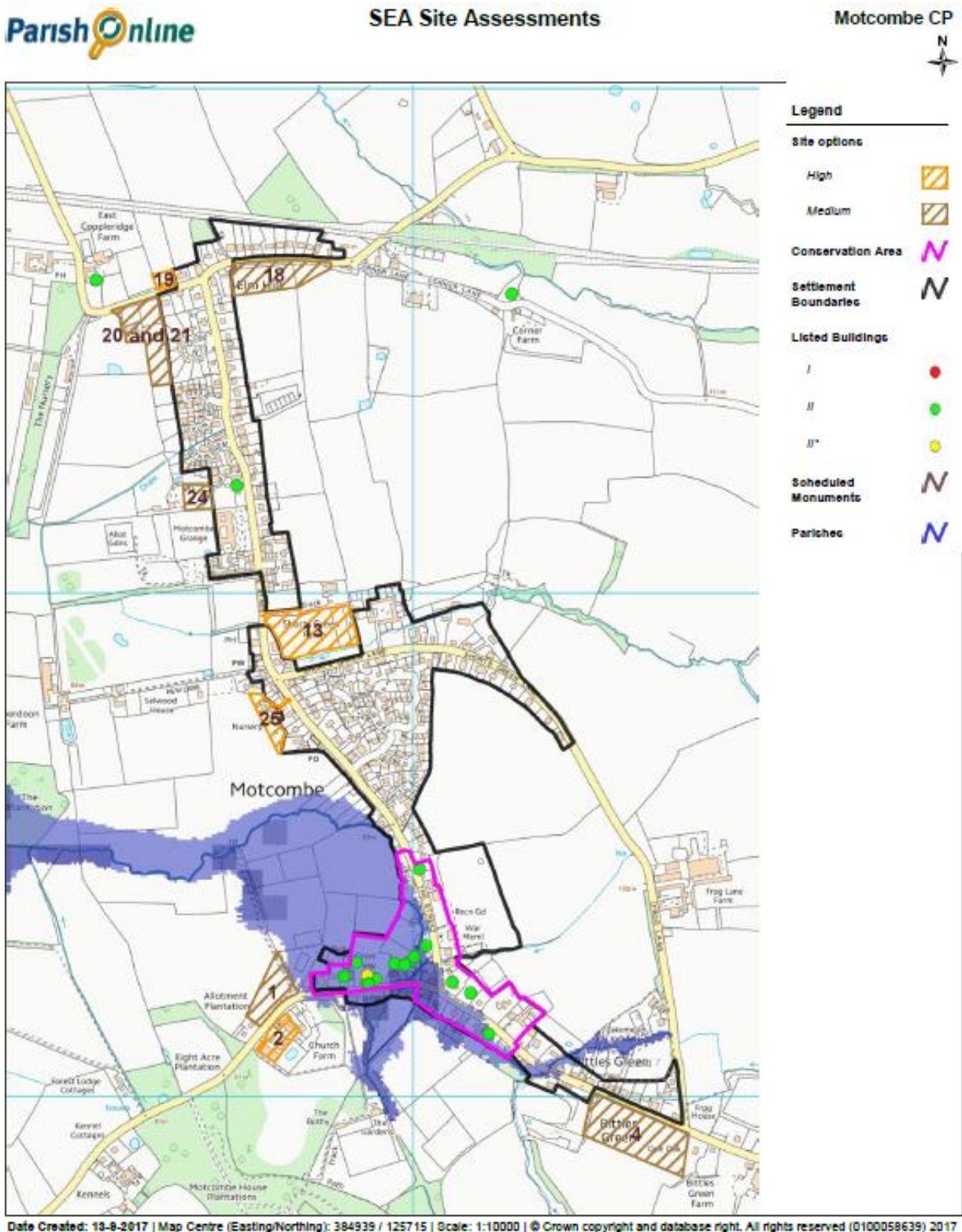
Ref	SHLAA	Location	Issues	Conclusions
5	n/a	NE corner Frog Lane / Motcombe Rd	Negative score: (4) Marginal scores: (2) (3) and (6)	Outlying sites which score poorly against criteria 4, and potentially impacting on character and concerns raised re safety of Frog Lane. Noted: surface water flood risk also indicated across significant part of sites 6 / 7 / 8
6/7	0009 / 0010	RO Yew Tree Cottage (Frog Lane)	Negative score: (4) Marginal scores: (1) (5) and (6)	
8	05310	Lakemead Kennels (Frog Lane)	Negative scores: (4) and (5) Marginal score: (6)	
9	0409	Turks Field (Frog Lane)	Negative scores: (1), (2), (3) and (5) Marginal score: (4)	Large site difficult to develop organically and comparatively elevated to main village
15/16	0440 / 0536	RO Summer Oaks / Heathfield	Negative scores: (1) and (2) Marginal score: (3)	General scored poorly in terms of impact on linear village character, and also impacting on views out to the countryside
17	n/a	Land south Elm Hill	Negative scores: (3) and (5), Marginal scores: (1), (2) and (4)	
22/23	0004 / 0005	Land Red House Farm	Negative scores: (1), (2) and (5)	Large sites difficult to develop organically and

	(Elm Hill)	Marginal score: --	poorly related to linear village character
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Site 1 was reduced in size to exclude the area to the rear and east of Barcroft / Woodside which would have also scored negatively.

STAGE 2 - ADDITIONAL CHECKS

The following map shows the location of the remaining sites and the main environmental constraints (as available mapped).



Contact was made with landowners to check the sites were still available, and additional checks were made in terms of heritage impacts, flood risk, and the contaminated land register

Availability

The new owner of site (19) - Garden Sunset Ridge, Elm Hill – requested that his garden be withdrawn from consideration

Heritage

The Conservation team of North Dorset District Council were approached for site-specific advice. Due to staff shortages, they were unable to provide support at this stage, and therefore an independent heritage expert (Kevin Morris) was employed to provide a more definitive consideration of possible heritage impact (appended to this report). His study highlighted two potential sites that may cause harm:

Site 1:

- Could reduce, albeit very slightly, the prominence of St. Mary's Church tower within the immediate landscape. However this is only slight and through sensitive design and siting of new buildings, views to the tower can be maintained.
- Possible indirect impact upon the setting of the Conservation Area. However, given its scale and relationship with the conservation area boundary any harm (and this is thought to be slight) can be mitigated through sensitive design as mentioned previously.

Site 24:

- Potential threat to existing recorded areas in the HER, but can be mitigated
- Could impact on the significance of the statutory listed buildings of Red House Farm, although subject to design limited development could cause less than substantial harm.

Due to the potential for a significant impact on the Grade II Listed Red Barn, and consequent limited scope to development, site 24 has been excluded as a potential option. Site 1 will continue to be considered as a potential option as the level of possible harm was considered slight, and further advice sought from the Local Planning Authority if this is to be made a site allocation

Flood risk

The Flood Risk Management of Dorset County Council were approached for site-specific advice, given that potential surface water flood risk had been identified on parts of a number of sites. The flood risk maps advise that "Flooding from surface water is difficult to predict as rainfall location and volume are difficult to forecast. In addition, local features can greatly affect the chance and severity of flooding". They have not ruled out any site allocations at this stage but flagged the requirement for further consideration in relation to sites 1, 2, 4 and 13. A more detailed assessment will be required to ascertain the extent and significance of any flood risk before any of these sites are considered for possible allocation.

Contaminated land

The Environmental Health team of North Dorset District Council were approached for site-specific advice. They provided maps of the contaminated land records, which indicate that no site option is likely to be affected by contamination.

These findings are summarised in the following table:

Ref	Location	Objectives Score	SHLAA	Further checks
2	Church Farm barns	High Score	0398 EXCLUDED from SHLAA as: "outside of settlement boundary and away from main part of village"	No identified heritage impacts No contamination records Shown by relevant mapping to be at significant (theoretical) risk of surface water flooding (1:30/100/1000 year). Any redevelopment proposals would need to consider both the prevailing risk of received surface water, and the management of surface water runoff generated by the site.
13	Shorts Green Farm, The Street	High Score	0407 SHLAA notes potential drainage requirement area (SuDS), retention of boundary trees, possible contamination	No identified heritage impacts No contamination records immediately impacting (but within 250m of several records) Shown by relevant mapping to be at significant (theoretical) risk of surface water flooding (1:30/100/1000 year). Any development proposals would need to consider both the prevailing risk of (surface water) flooding, and the management of surface water runoff generated by the site.
19	Garden Sunset Ridge, Elm Hill	High Score	0005 SHLAA notes retention of hedgerow	SITE NO LONGER AVAILABLE
25	The Nursery (The Street)	High Score	0006 SHLAA notes retention of trees / hedgerow	No identified heritage impacts No contamination records immediately impacting (but within 250m of now closed Bacon Factory at E384818 N125695) Not shown by relevant mapping to be at (theoretical) risk of surface water flooding
1(E)	Opposite Church Farm	Medium Score	0528 EXCLUDED from SHLAA as: "outside of settlement boundary and away from main part of village"	Potential for slight (indirect) harm to the setting of the church tower and Conservation Area. However, this can be mitigated through sensitive design No contamination records Shown by relevant mapping to be at some (theoretical) risk of surface water flooding (1:100/1000 year). Any redevelopment proposals would need to consider both the prevailing risk of received

Ref	Location	Objectives Score	SHLAA	Further checks
				surface water, and the management of surface water runoff generated by the site.
4	Beside Shire Meadows, Motcombe Rd	Medium Score	0408 No SHLAA-specific comments on site issues	No identified heritage impacts No contamination records Not shown by relevant mapping to be at (theoretical) risk of surface water flooding, although the adjacent highway is thought to be at risk during severe rainfall events (1:1000 year).
18	Elm Hill (SE) – land off Knapp Hill	Medium Score	0004 SHLAA notes retention of boundary trees / hedgerow	No identified heritage impacts No contamination records Not shown by relevant mapping to be at (theoretical) risk of surface water flooding
20 / 21	Elm Hill (SW) - land west of Highfields	Medium Score	0441 / 0439 SHLAA notes retention of boundary trees, possible contamination (shed).	No identified heritage impacts No contamination records immediately impacting (within 250m of unknown filled ground record at E384221 N126639) Not shown by relevant mapping to be at (theoretical) risk of surface water flooding
24	Rear of Stainers Mead	Medium Score	0435 SHLAA notes half of site is in drainage requirement area, retention of trees and development sensitive to the character of the Area (Listed building)	SITE EXCLUDED Potential to cause harm to the significance of the heritage asset (other than very limited development). No contamination records Is shown by relevant mapping to be at some (theoretical) risk of surface water flooding along the northern boundary of the site, during severe rainfall events (1:1000 year).

POTENTIAL ENVIRONMENTAL ISSUES – SITE OPTIONS ASSESSMENT

Given the potential sites being considered, and the environmental issues, the following conclusions and way forward are proposed:

Landscape

The potential for development to harm nationally important landscapes is unlikely, as the site options are in close proximity to the existing settlement of Motcombe, and sufficiently distant from the Cranborne Chase and West Wiltshire Downs AONB to be unlikely to impact on its setting significantly.

Biodiversity, Flora and Fauna

No significant issues identified. However this does not rule out potential harm if protected species are present within a site.

Proposed Action:

In order to avoid potential for harm, an ecological appraisal of all proposed site allocations will be undertaken prior to pre-submission draft stage. Where this flags up potential for harm that cannot be avoided or mitigated by amending the site area or the inclusion of suitable policy wording, such sites will not be allocated in the neighbourhood plan.

Cultural Heritage

None of the sites would impact on the three properties on the 'at risk' register. The potential for development to harm the significance of heritage assets is avoided with the exclusion of site 24, and the slight harm identified in relation to site 1 is considered to be capable of mitigation. Harm should therefore be avoided, subject to further checks with heritage experts prior to plan drafting.

Proposed Action:

Involve the Conservation team at the District Council to establish the need for any further consideration of heritage impacts prior to pre-submission draft stage.

Soil, Water and Air

The potential for development to be harmed by existing contamination is unlikely.

Climatic Factors

National policy is clear that local planning authorities should where possible avoid flood risk to people and property by applying (as a first step) the Sequential Test, which means that development should be refused if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. This guidance will need to be followed by the Neighbourhood Plan. Some parts of possible development sites are within surface water flooding areas, and therefore this risk will need to be considered.

Proposed Action:

The Neighbourhood Plan will not be able to allocate sites at risk of flooding if other lower-risk sites are available, if it is to meet the basic condition of having regard to national policy. By involving the Flood Risk Management team at the County Council to establish the need for further flood risk assessment, such risks can be assessed, and advice followed on whether such sites should not be allocated in the neighbourhood plan, or if the site area or other mitigation measures may ameliorate potential risks.

5 DRAFT SCREENING OPINION

The SEA screening process, which is summarised in the flowchart shown in Appendix 1, has been followed and the decisions are recorded for each stage in the following table

Question in SEA screening flow chart	Response
1. Is the Plan 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? [Article 2(a)]	<p>YES</p> <p>The Motcombe Neighbourhood Plan would be prepared by Motcombe Parish Council and adopted by North Dorset District Council through a legislative procedure.</p>
2. Is the plan required by legislative, regulatory or administrative provisions? [Article 2(a)]	<p>YES</p> <p>The Motcombe Neighbourhood Plan would be a Statutory document, prepared in accordance with the Neighbourhood Planning (General) Regulations 2012.</p>
3. Is the plan prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consents or projects in Annexes I and II to the EIA Directive? [Article 3.2(a)]	<p>YES</p> <p>The Motcombe Neighbourhood Plan is a document prepared for town and country planning purposes.</p> <p>It does intend to allocate land for future development (falling under Annex II of the EIA Directive as an urban development project), and provide guidance that may influence such decisions.</p>
5. Does the plan determine the use of small areas at local level, OR is it a minor modification of a plan subject to Article 3.2? [Article 3.3]	<p>YES</p> <p>The Motcombe Neighbourhood Plan, when made, will form part of the development plan for the area and used to determine the use of small areas at a local level.</p>
8. Is the Plan likely to have a significant effect on the environment? [Article 3.5]	<p>NO</p> <p>Justification for this decision is given later in this chapter.</p>

JUSTIFICATION FOR POTENTIAL SIGNIFICANCE OF EFFECTS ON THE ENVIRONMENT

The significance of the effect of a Neighbourhood Plan on the environment does depend on the proposals within the plan, and the environmental sensitivity of the area.

The criteria for assessing the likely significance of effects are set out in Annex II of the SEA Directive, Schedule 1 of the Regulations and set out below.

Schedule 1 of the Regulations	Assessment
1. The characteristics of the plan, having regard to:	
<ul style="list-style-type: none"> – 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 	<p>The Motcombe Neighbourhood Plan will be part of the development plan for the local area. The framework for development within the area is set by the North Dorset Local Plan, which provides the strategy for the extent and location of development in this area, and how impacts on environmental constraints will be considered. The Motcombe Neighbourhood Plan will need to be in general conformity with these strategic policies in order to meet the basic conditions required by legislation.</p>
<ul style="list-style-type: none"> – the degree to which the plan influences other plans and programmes including those in a hierarchy; 	<p>The Neighbourhood Plan will need to be taken into account in future development plans for the area, but does not limit future policy direction</p>
<ul style="list-style-type: none"> – the relevance of the plan for the integration of environmental considerations in particular with a view to promoting sustainable development; 	<p>Neighbourhood Plans are required to contribute to the achievement of sustainable development in order to meet the basic conditions as set by legislation.</p>
<ul style="list-style-type: none"> – environmental problems relevant to the plan; 	<p>The main environmental issues relate to:</p> <p>Landscape: the Cranborne Chase and West Wiltshire Downs Area of Outstanding Natural Beauty covers the eastern edge of the plan area. Major of insensitive development within the AONB or affecting its setting is likely to impact on this nationally important landscape.</p> <p>Cultural Heritage: there presence of various heritage assets (including Grade II* Listed buildings and the Motcombe Conservation Area) that could be harmed by development.</p> <p>Soil, Water and Air: there are no known issues relating to exceeded environmental quality standards or limit values. The contaminated land register holds records of potentially contaminated land within the parish generally relating to unknown filled ground and previous business / factory-type uses where pollution may have occurred.</p> <p>Climatic Factors: there are areas at risk from flooding relating to the tributaries of the Lodden, which particularly impacts on the historic core of the village, with surface water flooding also noted in the area around Shorts</p>

	Green Farm and off The Street / Stainers Mead.
– 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).	Neighbourhood Plans are land use plans and cannot contain policies or proposals in respect of development that is a county matter (mineral extraction and waste development).
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,	It is anticipated that the plan period will be 13 years (until 2031). Whilst some effects of the plan may be irreversible, it is not considered probable that the plan will have significant effect since it is only likely to bring forward in the region of 60 additional dwellings over this period.
– the cumulative nature of the effects,	The Motcombe Neighbourhood Plan is not allocating sites significantly in excess of the level anticipated for the rural area as set in the adopted Local Plan (which was a minimum). The Gillingham Neighbourhood Plan (now submitted for examination) has not allocated sites for additional development. Other plans (eg Shaftesbury) are at an early stage and there is no clear indication that they would come forward for adoption and if so, what their content would be.
– the transboundary nature of the effects,	The transboundary impacts, beyond the Motcombe Neighbourhood Plan area, are unlikely to be significant in light of the nature and scale of the proposals
– the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected),	Neighbourhood Plans cannot contain policies or proposals in respect of development that falls within Annex 1 to Council Directive 85/337/EEC. The Motcombe Neighbourhood Plan area occupies approximately 20km ² and holds a population of 1,474 people according to the 2011 census.
– the risks to human health or the environment (e.g. due to accidents),	The Motcombe Neighbourhood Plan is unlikely to introduce significant risks to human health and the environment, in light of the scale and type of likely development and checks on contaminated land records.
– the value and vulnerability of the area likely to be affected due to:	The potential for development to harm nationally important landscapes is unlikely, as

<ul style="list-style-type: none"> > 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. 	<p>the site options are in close proximity to the existing settlement of Motcombe, and sufficiently distant from the Cranborne Chase and West Wiltshire Downs AONB to be unlikely to impact on its setting significantly.</p> <p>The potential for development to harm designated wildlife sites is low, and potential harm to protected species will be avoided through site-specific checks.</p> <p>The potential for development to harm the significance of heritage assets is avoided with the exclusion of site 24, and the slight harm identified in relation to site 1 is considered to be capable of mitigation. Harm should therefore be avoided, subject to further checks with heritage experts prior to plan drafting.</p> <p>The potential for development to be harmed by existing contamination is unlikely.</p> <p>Some parts of possible development sites are within surface water flooding areas, and therefore this risk will need to be considered, however national policy is clear that development should not be allocated in areas at risk from flooding if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. This guidance, and any additional mitigation identified, will need to be followed by the Neighbourhood Plan.</p> <p>No other environmental issues have been identified</p>
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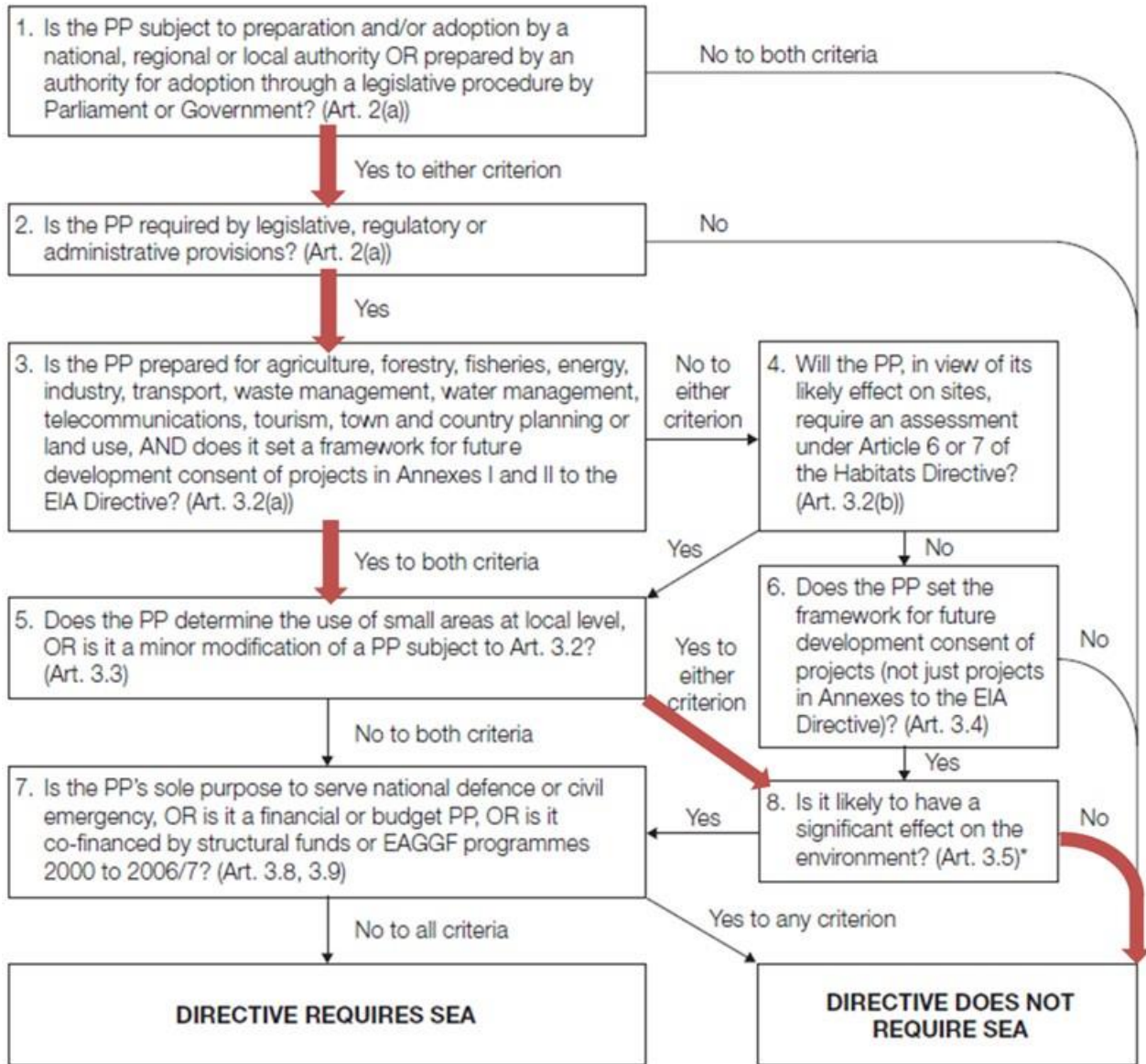
DRAFT FINDINGS

In light of the above analysis, it is proposed that the plan is unlikely to have a significant effect on the environment, and the proposed screening opinion (draft) concludes that the SEA Directive does not require a Strategic Environmental Assessment for the Motcombe Neighbourhood Plan.

This opinion, if accepted at this stage, will be re-visited by North Dorset District Council at future stages, as the District Council must decide whether the Neighbourhood Plan proposals are compatible with EU obligations when it takes the decision on whether the Neighbourhood Plan should proceed to referendum; and when it takes the decision on whether or not to make the Neighbourhood Plan.

APPENDIX 1: A DIAGRAM SUMMARISING THE SEA SCREENING PROCESS.

This diagram is intended as a guide to the criteria for application of the Directive to plans and programmes (PPs). It has no legal status.

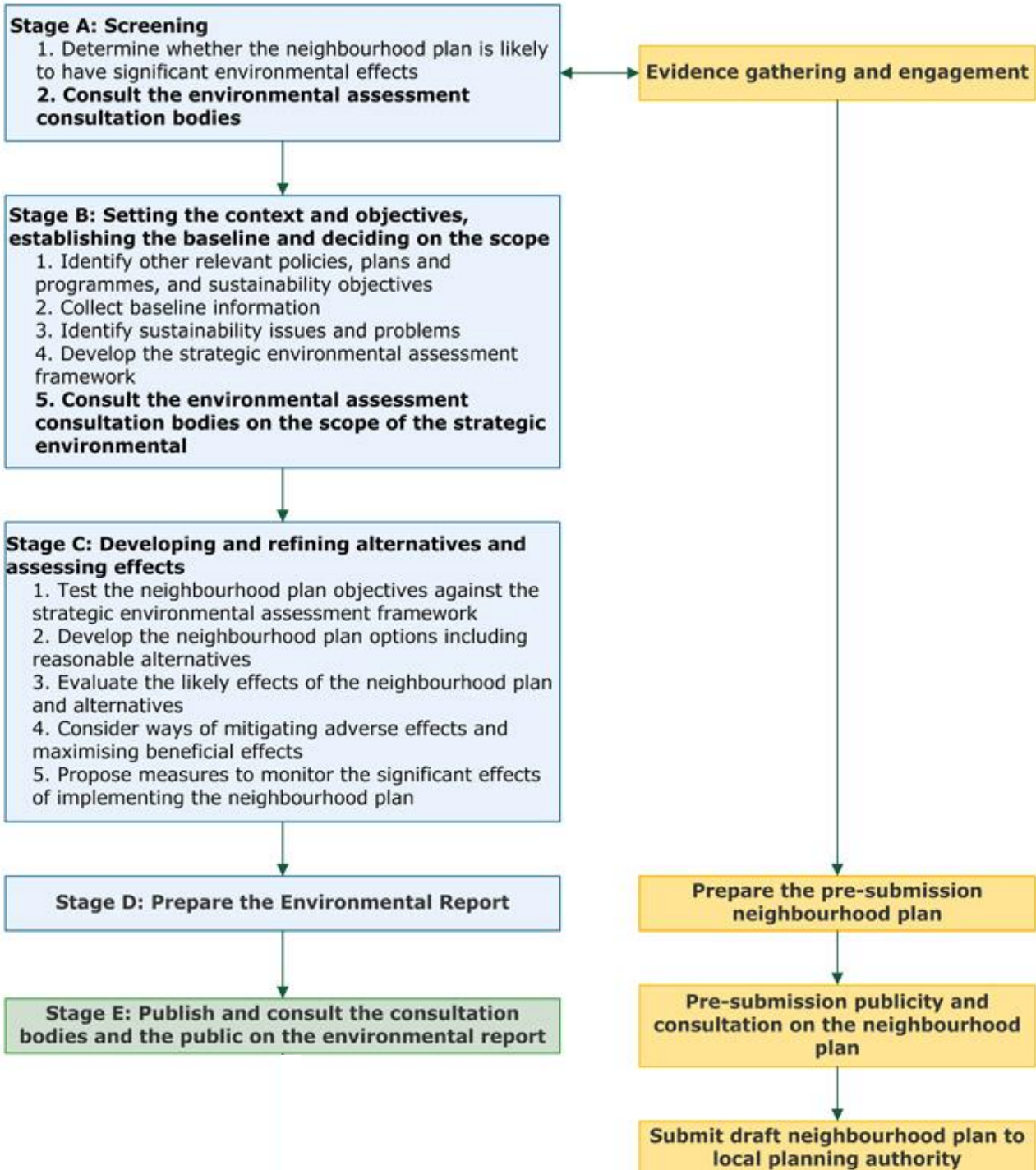


*The Directive requires Member States to determine whether plans or programmes in this category are likely to have significant environmental effects. These determinations may be made on a case by case basis and/or by specifying types of plan or programme.

APPENDIX 2: SEA STAGES

Strategic environmental assessment process

Neighbourhood plan preparation



Appendix B

Date: 17th January 2017

Our ref: 234566



Philip Reese

North Dorset District Council



BY EMAIL ONLY

Dear Philip,

Screening consultation: Motcombe Neighbourhood Plan SEA

Location: Motcombe, North Dorset

Thank you for your consultation on the above dated 7th December which was received by Natural England on the same date.

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.

Screening Request: Strategic Environmental Assessment

It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests are concerned (including but not limited to statutory designated sites, landscapes and protected species, geology and soils), that there are unlikely to be significant environmental effects from the proposed plan.

Natural England welcomes the proposed action of an ecological appraisal of all proposed site allocations prior to the plan's pre-submission draft stage and the proposal to obtain environmental data for the plan area from the Dorset Environmental Records Centre. It should be noted that, from our records, site 4 is within 500m of Fishy Mead SNCI which is not currently reflected in the information provided within the SEA screening request report.

The allocations in the neighbourhood plan do not pose significant concern for Natural England in terms of their impact on the environment, though we would like to highlight the need for any site over 0.1ha to produce a Biodiversity Mitigation and Enhancement Plan (BMEP). Natural England recommends that all BMEPs are approved by the Dorset County Council Environment Team (DCC NET) and submitted to the Local Planning Authority as part of the planning application. The production and adherence to the approved BMEP will provide the development with adherence to the additional requirements of biodiversity enhancement as set out in the NPPF paragraphs 7, 109 and 118.

We have checked our records and based on the information provided, we can confirm that in our view the proposals/allocations contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect.

We are not aware of significant populations of protected species which are likely to be affected by the proposals within the plan. It remains the case, however, that the responsible authority should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected.

Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SA/SEA is necessary.

Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SEA/SA screening stage, should the responsible authority seek our views on the scoping or environmental report stages. This includes any third party appeal against any screening decision you may make.

For any queries relating to the specific advice in this letter only please contact Emily Greaves on [REDACTED]. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

Emily Greaves

Sustainable Development Adviser
Natural England - Dorset, Hampshire and Isle of Wight

[REDACTED]
[REDACTED]
[REDACTED]

Appendix C

Mr Nick Cardnell - Neighbourhood
Planning Officer
North Dorset District Council
Nordon Salisbury Road
Blandford Forum
Dorset
DT11 7LL

Our ref: WX/2006/000033/OR-
08/PO2-L01
Your ref:
Date: 19 January 2018

Dear Mr Cardnell

**Motcombe Neighbourhood Plan Strategic Environmental Assessment Screening
Opinions December 2017**

Thank you for consulting the Environment Agency on the above mentioned document.
Our apologies for the delay in responding, we have the following advice

We can agreed with the conclusion that the plan is unlikely to have a significant effect
on the environment, and that the plan does not require a Strategic Environmental
Assessment for the Motcombe Neighbourhood Plan.

We note that the sites being considered are all outside of the publish flood map for
planning. Therefore, the Lead Local Flood Authority have provided comments in regards
to surface water.

We support that the document has considered risk of pollution through contaminated
land.

Please contact me if you have any queries.

Yours sincerely

MICHAEL HOLM
Planning Advisor - Sustainable Places

[Redacted signature block]

Environment Agency

[Redacted contact information]

www.gov.uk/environment-agency

End

Appendix D

Thank you for your consultation on the SEA Screening for the Motcombe Neighbourhood Plan. Our apologies for not responding by yesterday's deadline.

To confirm that this is our first involvement with this Plan since offering generic advice on its designation at the beginning of 2016. Our comments are based on the documents you have provided only. Having looked at the Plan's website there appear to be no other forms of supporting evidence yet available. We also could not find a Conservation Area Appraisal on your authority's website so assume one doesn't exist.

But what has been provided is most helpful. The SEA Screening Report goes into useful detail about the Plan area and its issues, with particular emphasis on the process of assessing the possible site options for allocation. This is complemented by the Heritage Assessment which looks at each of the tentative development sites from the perspective of their potential to generate impacts on heritage assets.

From these reports we can confirm that the focus of our attention is site 1. The Heritage Assessment concludes that there will be a less than substantial level of harmful impact on the setting of the Grade II* Listed St Mary's Church and that of the Conservation Area and that this can be mitigated through the location and sensitive design of new buildings.

While the report identifies the role of the church tower in defining views it doesn't elaborate on the extent to which a sense of connectivity with its undeveloped rural hinterland plays a part in defining its heritage significance. Similarly, although the report refers to the conservation area backing on to open fields it doesn't define the importance of that part of the area's setting to its heritage significance, merely stating that development could cause a degree of harm. The absence of a Conservation Area Appraisal limits the ability to consider the contribution made by this part of its setting within a more comprehensive strategic understanding or context.

The issue therefore remains the principle of allocation and the fundamental change in character of the site which would inevitably ensue if allocated for development. We must assume that site 1 is part of a wider rural context which plays a significant part in defining the setting of the conservation area and that its allocation in principle will therefore cause harm, even if less than substantial in nature. On that basis it is difficult to see how location and design of development can achieve much in the way of mitigation; it is a question of determining how much development and where the site can accommodate to minimise that harm, not mitigate it. And while mitigation may play a complementary role at this time we do not know what it needs to be or its effectiveness.

At present there appears to be no detailed assessment of the site to be able to determine the answer to those issues. Too much development in the wrong locations and of the wrong design could therefore be quite capable of

generating significant environmental effects. As the Plan at this stage has not yet formulated a policy for the site it is impossible to know whether it will ultimately cause such effects or not. But further site assessment could identify how harm could be minimised, what mitigation should be, and how therefore a policy/brief for the site should be articulated.

As a consequence we are not sure there is enough information to be able to conclude that an SEA is not required. We recognise that the community would wish to avoid carrying out an SEA if at all possible and further research into the site would help demonstrate more precisely exactly what its potential for development would be. If the community wishes to specify a quantum of development for the site then we would certainly encourage an SEA to determine this and associated harm minimisation/mitigation measures. If it wishes only to allocate the site for development with the requirement that further assessment will be necessary to determine its specific potential for development it is not clear at present that this can be achieved without still generating significant environmental effects.

Either way, it seems difficult to arrive at an acceptable scenario capable of avoiding the need for SEA if only on a default basis. Perhaps for now the answer is to defer the matter and repeat the exercise when more information of the kind described above is known.

19 January 2018
David Stuart, Historic England,

Appendix E

Philip Reese

From: Greaves, Emily (NE) [REDACTED]
Sent: 24 January 2019 10:20
To: Philip Reese
Subject: RE: Motcombe NP - SEA screening opinion

Follow Up Flag: Follow up
Flag Status: Flagged

Good morning Philip,

Thank-you for your e-mail, happy to confirm Natural England's position.

Motcombe Parish is approximately 3.5km from the nearest European Designated site, Fontmell & Melbury Downs SAC. As per our previous response to the SEA screening request, it is Natural England's opinion that the Neighbourhood Plan is unlikely to harm any Special Area of Conservation (SAC) and is unlikely to significantly affect the interest features for which they are notified. As such we agree with your Authority's conclusion that a HRA is not necessary in this case.

Please note that we have not reviewed the updates to the Neighbourhood Plan, if you would like specific comments on the draft please re-consult Natural England.

Kind regards,
Emily

Emily Greaves
Sustainable Development Adviser

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

[REDACTED]



www.naturalengland.org.uk

We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing