## **Earls Barton Neighbourhood Plan**

## Reasons for Determination under Regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004

The Planning and Compulsory Purchase Act 2004 requires all local development documents (LDDs) to be supported, and to a great extent led, by a formal Sustainability Appraisal (SA) designed to meet the requirements of the SEA Directive. This requirement was amended as part of the Planning Act 2008 to only require full SA of development plan documents (DPDs) which are those documents that make up a 'local plan.' There is no requirement under either Act for a full SA to be prepared for Neighbourhood Plans. However, SEA may still be required.

The Environmental Assessment of Plans and Programmes Regulations 2004 (EAPP Regulations) are used to determine whether a plan or programme (PP) such as the Earls Barton Neighbourhood Plan (EBNP) require SEA, directing the responsible authority in a series of steps to reach a view.

The following assessment, in accordance with the EAPP Regulations, was undertaken by BCW and EBPC to identify any requirement for full SEA. The relevant Articles from the SEA directive are given in brackets:

Regulation	Y/N	Reason
Regulation 2 (1)	Υ	The EBNP is prepared by Earls
PP means plans and programmes,		Barton Parish Council. Upon
including those co-financed by the		successful completion of an
European Community, as well as any		examination and referendum it will be
modifications to them, which –		made by the local authority as part of
(a) are subject to preparation or adoption		the development plan. It is regulated
by an authority at national, regional or local level; or		by legislative procedures.
(b) are prepared by an authority for		
adoption, through a legislative procedure		
by Parliament or Government; and in either		
case,		
(c) are required by legislative, regulatory or		
administrative provisions;		
(1.1.1.24.)		
(Article 2(a))		
Regulation 5(2)	Υ	The EBNP is a PP required for town
1 % BB 111		and country planning purposes and it
Is it a PP which:		sets the framework for Annex II
(a) Is prepared for agriculture, forestry,		development. Whilst it is known that
fisheries, energy, industry,		no EIA would be required for the
transport, waste management,		proposal subject of the main
water management,		allocation within the Plan it may still
telecommunications, tourism, town		be considered to be a project listed under Annex II of the EIA Directive.
and country planning or land use; AND		under Annex II of the EIA Directive.
(b) Sets the framework for future		
` '		
development consent of projects in Annex I or II to Council Directive		
Annex For It to Council Directive		

85/337/EEC on the assessment of the effects of certain public and private projects on the environment, as amended by Council Directive 97/11/EC?  (Article 3.2(a))  Regulation 5(3)  Has the PP, in view of the likely effect on sites, been determined to require an assessment pursuant to Article 6 or 7 of the Habitats Directive?	N	The need for appropriate assessment has been screened out following separate consultation with Natural England.	
(Article 3.2(b))  It may be required that the Plan would be eliquider Reg 5 (5) or 5(6) apply.	gible for fu	III SEA, unless the exemptions set out	
Regulation 5 (5) Is the PP's sole purpose to serve national defence or civil emergency; a financial or budget PP or is it co-financed under Council Regulations (EC) No's 1260/1999 or 1257/1999  (Article 3.8,3.9)	N	N/A	
Regulation 5(6)  Does the PP:  (a) determine the use of a small area at local level; or (b) propose a minor modification of an existing PP subject of the regulations.  (Article 3.3)	Y	(a) The EBNP only seeks to designate the use of sites at a local level that are not strategic in scale. This view is enforced by the analysis of likely significant effects set out in the table below. The policies and allocation included in the Plan principally seek to respond to local level needs and place importance on maintaining the contained nature of Earls Barton. It is also consistent with the strategic provisions of the adopted development plan.  (b) The EBNP does not propose minor modifications of an existing pp subject of the regulations.	
It may still be required that the Plan would be eligible for full SEA, unless it is determined that it will not give rise to significant environmental effects under Regulation 9.			
Regulation 9(1)  Is the PP likely to have a significant effect on the environment taking into account the views of the consultation bodies and the criteria set out at Schedule 1 of the Regulations?  (Article 3.5)	N	Following consultation with NE, EH and EA and their own independent assessment of the PP against Schedule 1 of the Regulations it has been identified that the EBNP will not give rise to any significant environmental effects. Further detail for this decision is set out below.	

The following assessment was made by BCW and EBPC as to whether the plan was likely to have any significant environmental effects. This takes into account the responses and independent assessments of the three consultation bodies against the Schedule 1 criteria in the EAPP Regulations, set out below. This assessment has been undertaken bearing in mind the following context:

- The EBNP has been developed to be in general conformity with the strategic policies of the adopted development plan contained in the North Northamptonshire Core Spatial Strategy 2008 which itself was subject of SEA.
- Where relevant, we have had reference to the SEA work undertaken in support of the emerging Joint Core Strategy that additionally supports Earls Barton's assumptions around growth.
- The assessment set out below has been informed in a large part by discussions and the written responses of the three named consultation bodies.
- The assessment set out below has also been informed by other relevant screenings of the EBNP against the Habitat Regulations as well as an EIA screening opinion covering a planning application at local level seeking the development of the EBNP's primary allocation at the Grange.

Criteria	Assessment	Significant environmental effect (positive or negative)?
The characteristics of plans and	d programmes, having regard to:	,
The degree to which the plan or programme sets a framework for projects and other activities, either in regard to location, nature, size and operating conditions or by allocating resources.	The PP only sets the framework for projects in a local context. Indeed, there is a statutory requirement for the plan to provide policies that are in general conformity with the strategic policies of the adopted development plan. To this end it cannot by its nature provide for development that significantly exceeds the intentions of the adopted CSS 2008 and instead primarily seeks to provide for the local needs of Earls Barton whilst additionally contributing a suitable level of housing towards the needs of the Borough.	None likely
The degree to which the plan or programme influences other plans and programmes including those in the hierarchy.	Whilst Neighbourhood Plans comprise part of the statutory development plan for the Borough they are required to conform with the strategic policies of the development plan. They are effectively the bottom tier of the statutory policy pyramid.	None likely
The relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development.	Neighbourhood Plans are required by legislation to help achieve sustainable development. This includes environmental sustainability, as one of the three pillars identified in the NPPF. The primary objective of the EBNP is to	None likely

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	plan positively and achieve a sustainable	
	level of growth whilst maintaining both the built and natural environment of the	
	village and the surrounding rural area.	
Environmental problems	Numerous potential environmental issues	None likely
relevant to the plan or	have been identified in the responses	Trono intory
programme.	from the consultation bodies. In each	
	instance it has been judged that the	
	framework of policies provided by the	
	EBNP will successfully manage the	
	introduction of development to the extent	
	that any residual environmental issues	
	will be mitigated against sufficiently.	
	Primarily, one of the key provisions of the	
	EBNP is to direct growth away from the Nene Valley SPA as far as is possible in	
	the context of the plan area and to	
	provide alternative recreation options.	
The relevance of the plan or	The plan is not relevant in this instance,	None likely
programme for the	as the matters described are guided by	
implementation of	higher level legislation (in some instances	
Community legislation on the	these matters will fall under the category	
environment (for example,	of 'excluded development' in the case of	
plans and programmes linked	Neighbourhood Plans). Instead, the	
to waste management or	policies of the EBNP must have sight of	
water protection).	these matters to ensure that any	
	development it promotes does not	
	compromise the objectives of higher level strategies.	
The characteristics of the effect	ts and of the area likely to be affected, havin	n regard in
particular, to:	to and or the area intery to be alreoted, havin	g rogara, m
The probability, duration,	A number of potential effects of the EBNP	Potential for
frequency and reversibility of	have been identified in both the	minimal effects
effects	responses from the consultation bodies in	but no significant
	relation to the determination of SEA, as	effects likely
	well as in response to the Habitats	
	screening. Whilst it is identified that there	
	may be effects caused by way of the local increase in population and associated	
	traffic movements and recreational	
	activities it is not anticipated that the	
	proposed level of growth will result in	
	additional human activity of any level of	
	significance. The primary effect will be	
	one of traffic movement to and from Earls	
	Barton (likely be way of commuting)	
	although these movements will be low in	
	volume and low in terms of duration. All of	
	the potential impacts identified during the	
	course of consultation will either be	
	mitigated against through policy	
	provisions in the plan (including the most sensitive location of new development) or	
l l	achailive location of tiew development) Of	
	through the existing strategic policies of	
	through the existing strategic policies of the local plan concerning modal shift	
	through the existing strategic policies of	
	through the existing strategic policies of the local plan concerning modal shift towards sustainable transport and	
The cumulative nature of the effects	through the existing strategic policies of the local plan concerning modal shift towards sustainable transport and protection of our most sensitive habitats	None likely

·		
	cumulative nature of the effects can be characterised by the impact the residents of the level of new homes planned for Earls Barton will have on the environment. Whilst it is accepted that unmitigated there may be a number of potential effects around traffic movement, waste generation, recreational uses and impact on the water environment the plan, the EBNP in combination with the adopted development plan and other plans and programmes, including the various management plans for the Nene Valley, propose measures to restrict and neutralise the impact of new development in and around the SPA primarily. In addition, the cumulative impact of potential development across North Northamptonshire (including the borough) has been considered as part of the SEA for the CSS.	
The transboundary nature of the effects	In context the EBNP is seeking to manage future development in a small, parish level area within the wider Borough of Wellingborough. It is unlikely that the Plan will have any sort of significant transboundary effect, taken primarily to mean impacting on another EU member state, as defined in the EIA Regulations. Even if 'transboundary' were to be defined as impacting on the jurisdiction of other administrative areas within the UK (for example between parishes or boroughs) the effect would be minimal in both instances.	None likely
The risks to human health or the environment (for example, due to accidents)	It is highly unlikely that the EBNP will give rise to any significant instances of risk to human health. It principally proposes the delivery of residential development by way of a policy that seeks to ensure it has no impact on highway safety.	None likely
The magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	As identified above it is highly unlikely that any environmental effect brought about by the EBNP will be of any magnitude or impact on any area of scale. It must be remembered at this stage that Neighbourhood Plans have a very limited ability to influence the delivery of strategic levels of development and this neighbourhood plan in particular only seeks to direct development to a small area at local level.	None likely
The value and vulnerability of the area likely to be affected due to (i) special natural characteristics or cultural heritage; (ii) exceeded environmental quality standards or limit values; or (iii) intensive land use.	The response from all three consultation bodies, including NE's response in relation to Habitats screening have been referred to in this instance. Whilst it has been identified that there are several protected designations in the plan area and the surrounding area, all three bodies are confident that the scale, location and	None likely

	probable impact of growth will not give rise to any significant environmental effects.	
The effects on areas or landscapes which have a recognised national, Community or international protection status.	The principal area of concern in this regard in the Nene Valley Gravel Pits SPA, which is a Natura 2000 site. A full assessment of the potential impact on this designation by NE has taken place as a result both this screening, the screening against the Habitats Regulations as well as at local level as a result of the screening for EIA undertaken in response to a planning application on the single residential allocation included within the EBNP.	None likely

As a result of the assessment set out above, incorporating the comments of the three consultation bodies, it is the unanimous view of all of three bodies as well as BCW and EBPC that the EBNP will not give rise to any significant environmental effects.

## Responses of Statutory Consultees:



#### FAST MIDLANDS

Alex Munro Neighbourhood Planning Officer Borough Council of Wellingborough

By email only
Our Ref: HD/P 5329
Your Ref:

19 December 2013

heritage.org.uk

Direct Dial: 01223 582775

Email: tom.gilbert-wooldridge@english-

Dear Mr Munro

#### Earls Barton Neighbourhood Plan: SEA/SA Screening Report

Thank you for your email dated 26 November consulting English Heritage on the above report.

For the purposes of this consultation, English Heritage will confine its advice to the question, "Is it likely to have a significant effect on the environment?" in respect of our area of concern, cultural heritage. Our comments are based on the information supplied with the Screening Report. It is for the Council to make the final decision in terms of whether SEA is required.

The Screening Report indicates that the Neighbourhood Plan will not have a significant effect any 'special natural characteristics or cultural heritage' in the area. On the basis of the information supplied, and in the context of the criteria set out in Schedule 1 of the Environmental Assessment Regulations [Annex II of 'SEA' Directive], English Heritage concurs with the Screening Report that the preparation of a SEA is not required in terms of cultural heritage impacts.

The views of other statutory consultation bodies should be taken into account before the overall decision on the need for a SEA is made. I should be pleased if you can send a copy of the determination as required by Regulation 11 of the Environmental Assessment of Plans and Programmes Regulations 2004.

We should like to stress that this opinion is based on the information provided by you with your email. To avoid any doubt, this does not reflect our obligation to provide further advice on later stages of the SEA process and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the plan/guidance) where we consider that, despite the absence of SEA, there would be an adverse effect upon the environment.

As the government's principal adviser on the historic environment, English Heritage has produced a number of documents relating to neighbourhood planning. The Parish Council may find these documents helpful in identifying what it is about there

> 44 DERNGATE NORTHAMPTON NN1 1UH Telephone 01604 735400 Facsimile 01604 735401 www.english-heritage.org.uk

English Heritage is subject to the Freedom of Information Act. All information held by the organisation will be accessible in response to a Freedom of Information request, unless one of the exemptions in the Act applies.



## EAST MIDLANDS

area which makes it distinctive and how they might go about ensuring that the character of the area is retained. These can be found at:-

www.english-heritage.org.uk/professional/advice/hpg/historicenvironment/neighbourhoodplanning/

We also advise that the conservation and archaeological staff of the Borough and County Councils are involved in the preparation of the Neighbourhood Plan and its assessment. They are best placed to advise on local historic environment issues

We hope this letter is of use. Please let me know if you have any queries.

Yours sincerely

Tom Gilbert-Wooldridge

Historic Environment Planning Adviser (East of England and East Midlands)



AN/2014/118644/01-L01

16 January 2014

**EBNP** 

Neighbourhood Planning Officer
Wellingborough Borough Council

Our ref:
Your ref:

Swanspool House Doddington Road Wellingborough NN8 1BP

FAO - Alex Munro

Dear Sir

## Proposed Earls Barton Neighbourhood Plan Earls Barton, Wellingborough

Thank you for engaging with us to determine if a Sustainability Appraisal is required to support Earls Barton Neighbourhood plan.

Date:

We have inspected the proposed plan to understand whether it is likely to have significant effects on the environment. Although, we have considered all the options presented, we have focussed on the preferred option 2 – Northern Development (Medium Growth). We find that the details of the current preferred area for growth include: approximately 250 affordable houses, *circa* 6ha of sports and leisure pitches, community hall and additional employment land.

We believe that the current preferred option 2 is not likely to have significant effects on the environment, provided mitigation measures for any adverse effects identified are sufficiently implemented.

Based on our evidence and with regards to the preferred option, we have the following comments to make:

### Water Quality

The Water Framework Directive (WFD) came into force on December 2000 and was transposed into UK law in December 2003. The first principle of the WFD is to prevent deterioration in aquatic ecosystems. No deterioration requires that a water body does not deteriorate from its current ecological or chemical classification and applies to individual pollutants within the water body.

There are two WFD waterbodies within the Earls Barton Parish:

- GB105032045050, The River Nene and
- GB105032045430, Sywell Brook

Both waterbodies are achieving 'Moderate Status'.

It is hoped that the preferred option would actively encourage practices and developments that would help prevent deterioration in water quality. We welcome the opportunity to provide further advice on practices and future proposals to avoid

Environment Agency
Nene House (Pytchley Lodge Industrial Estate),
Pytchley Lodge Road, Kettering, Northants, NN15 6JQ
Email: planningkettering@environment-agency.gov.uk
www.environment-agency.gov.uk

Customer services line: 03708 506 506 Calls to 03 numbers cost the same as calls to standard geographic numbers (i.e. numbers beginning with 01 or 02).

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unexpected issues arising.

#### Water Resources

The preferred option should take into account the availability of potable water supply when assessing new development in the area. Advice should be sought from the water company to find out whether additional water can be supplied using existing sources or whether new sources will be needed in the future. We may not be able to recommend a new or increased abstraction license where water resources are fully committed to existing abstraction and the environment.

Every opportunity should be taken to build water efficiency into new developments and innovative approaches should be encouraged.

The proposed development should consider setting high standards regarding water use and other indicators to deliver sustainable development. Making a minimum of Code Level 3 or 4 of the Code for Sustainable Homes mandatory, would ensure high water efficiency and sustainability performance is achieved for all buildings.

#### Flood Risk

The parish of Earls Barton contains several sections of Main River, namely: River Nene and Sywell Brook. There are also a few ordinary watercourses which appear to drain the village and surrounding land to these Main Rivers. The main rivers have flood zones associated with them but the absence of flood zones for the ordinary watercourse does not mean that they do not have the potential to cause flooding. The flood plain extent can be viewed in the 'What's in your Backyard?' section of the Environment Agency's website at www.environment-agency.gov.uk

We recognise that the preferred option for future growth is considering the need not only that flood risk does not increase, but seeks to actively reduce flood risk and provide betterment wherever possible in line with paragraph 100 of National Planning Policy Framework (NPPF).

Although we remain concerned with flooding from main rivers, the Lead Local Flood Authority (in this case Northamptonshire County Council) is the lead for local flood risk which includes groundwater, surface water and ordinary watercourses and should be included in any discussions.

#### Surface water drainage

We are keen to see how this proposal will play a vital role in managing surface water runoff and reducing the risk of surface water flooding. We believe this can be achieved through an understanding at a local level of existing surface water flooding issues and recommending action to alleviate or resolve these issues. The preferred option should actively promote sustainable methods of drainage that ensure surface water runoff does not increase as a result of new development. It is strongly recommended that the preferred option includes strong support for Sustainable Drainage Systems (SuDS). These can achieve multiple environmental benefits not only by reducing flood risk from surface water, but also in areas such as biodiversity, amenity and water quality.

Documents such as Ciria C697 (the SuDS Manual) and Part H of the Building Regulations 2000 can provide excellent reference points for determining a suitable working practice for surface water drainage considerations. It should be noted that any such recommendations within the Neighbourhood Plan must conform to and complement the requirements and aims of local planning policy, as well as the Lead Local Flood Authority's aims in respect of their role as SuDS Approval Body.

## Groundwater

NPPF paragraph 109 states that the planning system should contribute to and enhance the natural and local environment by preventing both new and existing development

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from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution. Government policy also states that planning policies and decisions should also ensure that adequate site investigation information, prepared by a competent person, is presented (NPPF, paragraph 121).

A few historic landfill sites are located within the Parish. These include:

- Aggate Way Site (SP 84600 62400), which operated from 1980 until 1991 and accepted inert and household waste.
- Earls Barton Quarry, East of Station Road (SP 86400 61700), which operated from 1979 until 1986. It was licensed to accept inert waste, perhaps not entirely within the Parish boundary and encroaches over the boundary to the west of Upper Nene Valley Pits.

We are able to provide further advice on protecting groundwater, including guidance on the use of SuDS.

#### Waste

The waste hierarchy – reduce, re-use, recycle – should be implemented for this proposal. Community composting schemes and the necessary waste handling facilities to accommodate this proposal should be a part of the essential infrastructure within the Parish.

We cannot over-emphasise the importance of early pre-application discussions on all proposals to ensure that any initial issues can be resolved and subsequent planning applications can run smoothly. Early liaison will achieve our aim of ensuring that schemes are enabled in a joined up way and avoid issues arising unexpectedly at advanced stages in the process.

#### Biodiversity

The parish boundary falls within/adjacent to Upper Nene Valley Pits, which covers national and international designated sites. The Upper Nene Valley Pits is designated as a Site of Special Scientific Interest (SSSI), Special Protection Area (SPA) and Ramsar site. We understand that Natural England is being consulted on the proposals to examine the need for an Appropriate Assessment of habitats.

We recommend that detailed proposals consider opportunities to enhance these sites for the benefit of the local community.

## Climate Change

We provide advice and support to businesses, public sector and other organisations to help them adapt to changing climates. Our aim is to help key sectors increase their resilience to climate risks. We are working closely with Defra as part of Climate Ready – the Government's national programme for adaptation, to help achieve this. It is therefore hoped that this proposal would encourage development that would address climate change. We welcome the opportunity to provide any early pre-application advice on future development.

Should you require any additional information, or wish to discuss our comments further, please do not hesitate to contact me on the number below.

Yours faithfully

Daniel Oladejo
Sustainable Places - Planning Specialist
Direct dial 01522 785017
Direct e-mail daniel.oladejo@environment-agency.gov.uk



Date: 16 December 2013

Our ref: 105293

Your ref: Earls Barton SEA

Alex Munro
Neighbourhood Plans Officer
Wellingborough Borough Council
AMunro@wellingborough.gov.uk

BY EMAIL ONLY



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

T 0300 060 3900

Dear Alex

#### Planning Consultation: Earls Barton Neighbourhood Development Plan - SEA Screening

Thank you for your consultation on the above document which was received by Natural England on 27 November 2013

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.

From the information that you have set out in the SEA Screening Report we concur with your conclusion that an SEA will not be required for the Earls Barton Neighbourhood Plan.

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/

We note from your accompanying letter that you will shortly be submitting a Habitats Regulations Screening report and we will look forward to receiving this. In relation to the Habitats Regulations, a Neighbourhood Plan cannot progress if the likelihood of significant effects on any European Site, either alone (or in combination with other plans and projects) cannot be ruled out (see Schedule 2, The Neighbourhood Planning (General) Regulations 2012). Measures may need to be incorporated into the Neighbourhood Plan to ensure that any likely significant effects are avoided in order to secure compliance with the Regulations.

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 <u>only</u> please contact Roslyn Deeming on 0300 060 1524. For any new consultations, or to provide further information on this consultation please send your correspondences to <u>consultations@naturalengland.org.uk</u>.

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

Roslyn Deeming Land Use Adviser Forward Planning Network Roslyn.deeming@naturalengland.org.uk

# Responses to Consultation of Additional information to the Earls Barton Neighbourhood Plan on:

-The letter from the Borough Council of Wellingborough dated 22 January 2015 and the appendix attached to it relating to SEA screening

-The Earls Barton Neighbourhood Plan Site Selection Process

Between 12 March and 24 April 2015

**From:** Nolan, Sharon [mailto:Sharon.Nolan@environment-agency.gov.uk]

**Sent:** 26 March 2015 10:50 **To:** Maxine Simmons

Subject: RE: Earls Barton Neighbourhood Plan

**Dear Maxine** 

Thank you for consulting us on the additional information to the Earls Barton Neighbourhood development plan.

We confirm we have no further comments to make.

If I can be of any further assistance please do not hesitate to contact me on the number below.

Kind regards,

## Sharon Nolan

Planning Advisor

Lincolnshire and Northamptonshire Area

Environment Agency

Nene House, Pytchley Lodge Road, Kettering, NN15 6JQ 750 5229 (internal) 01536 385229 (external) <a href="mailto:sharon.nolan@environment-agency.gov.uk">sharon.nolan@environment-agency.gov.uk</a> www.gov.uk/environment-agency

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Awarded to Lincolnshire and Northamptonshire Area.



**From:** Fletcher, Clive [mailto:Clive.Fletcher@HistoricEngland.org.uk]

**Sent:** 22 April 2015 11:59 **To:** Maxine Simmons

Subject: 965 Neighbourhood Plan for Earl's Barton

Dear Ms Simmons,

## **Neighbourhood Plan for Earl's Barton**

Thank you for consulting Historic England about the Neighbourhood Plan for Earl's Barton.

The area covered by the Neighbourhood Plan encompasses the Earl's Barton Conservation Area and includes a number of important designated heritage assets including the grade I listed church of All Saints and the Earl's Barton Motte Castle scheduled monument. In line with national planning policy, it will be important that the strategy for this area safeguards those elements which contribute to the significance of these assets so that they can be enjoyed by future generations of the area.

We therefore welcome the emphasis the plan gives to the historic environment in 6.4 Environmental Design Policy and 6.5 Open Space Policy. We would however caution against using the phrase, "conserve and protect the best heritage assets", in the objectives, as this could conceivably be taken to simply mean the church and castle motte, which we are sure was not the intention. Also, the policies themselves relate to many more areas than this objective would suggest, and so we advise that it would perhaps therefore be more effective to have a separate policy for the historic environment, as well as referencing it where appropriate elsewhere.

If they have not already done so, we would recommend that the neighbourhood group speaks to the staff at Northamptonshire County Council who look after the Historic Environment Record. They should be able to provide details of not only any designated heritage assets but also locally-important buildings, archaeological remains and landscapes. Some Historic Environment Records may also be available on-line via the Heritage Gateway (<a href="https://www.heritagegateway.org.uk">www.heritagegateway.org.uk</a>).

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

Yours sincerely,

di

Clive Fletcher | Principal Advisor, Historic Places

Telephone: 01159 861038

Mobile: 07771 502052

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NN1 5BE

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**From:** Deeming, Roslyn (NE) [mailto:Roslyn.Deeming@naturalengland.org.uk]

**Sent:** 08 April 2015 10:12 **To:** Maxine Simmons

**Subject:** Earls Barton Neighbourhood Plan - Further Advice and Reasons

**Dear Maxine** 

Thank you for consulting Natural England on the further advice and reasons regarding the Earls Barton Neighbourhood Plan. We note that the letter and accompanying Appendix A, prepared by the Borough Council of Wellingborough, explains the reasoning for the determination that SEA would not be required for this plan. We acknowledge that Natural England's previous comments and responses on this issue have been incorporated into the table within Appendix A and we therefore have no further comments to make.

If there is anything further that you would like to discuss on the matter please do not hesitate to contact me.

Kind Regards

Roslyn Deeming

Roslyn Deeming

Adviser

Sustainable Development Team

East Midlands Area

Ceres House

2, Searby Road

Lincoln

LN2 4DT

0300 060 1524

roslyn.deeming@naturalengland.org.uk

www.gov.uk/natural-england.

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.

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

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