

DENMEAD NEIGHBOURHOOD PLAN

STRATEGIC ENVIRONMENTAL ASSESSMENT

SCREENING OPINION

January 2014



SUMMARY

The achievement of sustainable development lies at the heart of the planning system, the key principles and requirements being expressed in the National Planning Policy Framework (March 2012) to which the Denmead Neighbourhood Plan must have regard.

Under the Environmental Assessment of Plans and Programmes Regulations 2004, a neighbourhood plan may be required to undertake Strategic Environmental Assessment (SEA) in accordance with the SEA Directive 2001/42/EC if it has ambitious content. Denmead Neighbourhood Plan Group has therefore asked Winchester City Council (WCC) to provide a screening opinion on whether a SEA is required.

Using the screening method set out in section 3, WCC considers that the Denmead Neighbourhood Plan is a relevant plan as defined in Article 3 of the SEA Directive and is likely to have significant effects on the environment.

It is therefore the City Council's recommendation that a SEA is required.

CONTENTS

Summary	1
1 Introduction	2
2 Strategic Environmental Assessment Screening Method.....	4
3 Assessment of Significant Environmental Effects	7
4 Conclusion	11
5 SA Framework – Decision Aiding Questions used for SEA Screening Opinion.....	12

1 INTRODUCTION

- 1.1 The Winchester District Local Plan Part 1 (LPP1) was adopted in March 2013. Denmead Neighbourhood Plan must comply with LPP1 which sets the planning context for the neighbourhood plan primarily, specifically under Policies MTRA1 and MTRA2, although all relevant LPP1 policies should be taken into consideration.
- 1.2 Specifically, MTRA2 requires Denmead to plan for about 250 net new dwellings over the plan period 2011-2031. The policy (below) also allows for economic and commercial growth, whilst being appropriate in scale and design and conserving settlement identity and countryside setting.

Policy MTRA 2 - Market Towns and Larger Villages

The Local Planning Authority supports the evolution of the larger settlements in the Market Towns and Rural Area to maintain and improve their role and function and to meet a range of local development needs through:-

In Bishops Waltham and New Alresford, provision for about 500 new homes in each settlement and provision for about 250 new homes in each of the following settlements:- Colden Common, Denmead, Kings Worthy, Swanmore, Waltham Chase, and Wickham.

Economic and commercial growth will be supported to maintain and improve the shopping, service, tourism and employment roles of these settlements where consistent with their role in the hierarchy of retail centres. Proposals for new floorspace of 500 sq. m. or more outside defined centres will need to demonstrate that it would not have a harmful impact on the centre. There should be improvements to public transport provision, where possible, and development should be appropriate in scale and result in a more sustainable community by improving the balance between housing, employment and services. Existing facilities, services and employment provision should be retained or improved to serve the settlements and their catchment areas.

Housing, employment, retail and services should be accommodated through development and redevelopment opportunities within existing settlement boundaries in the first instance. Sites outside settlement boundaries will only be permitted where, following an assessment of capacity within the built-up area, they are shown to be needed, or to meet a community need or realise local community aspirations identified through a neighbourhood plan or other process which demonstrates clear community support.. Uses which are essential to the role and function of the settlement, or to maintaining the balance between housing, employment and services, may be relocated if they can be re-provided in a location which is as at least as suitable and accessible and if proposals for the re-use of vacated land and premises are also acceptable.

All new development should be appropriate in scale and design and conserve each settlement's identity, countryside setting, key historic characteristics and local features, particularly as identified in Village Design Statements, the District Landscape Assessment or other guidance. Development should protect areas designated for their local, national, or international importance, such as Gaps and the South Downs National Park.

- 1.3 A Sustainability Appraisal (SA) of LPP1, which incorporated SEA, was prepared in accordance with the following requirements¹:
- Regulation 36 of the Town & Country Planning (Local Development) (England) Regulations 2004
 - Regulation 16 of the Environmental Assessment of Plans & Programmes Regulations 2004
 - Paragraph 165 of the National Planning Policy Framework.
- 1.4 Neighbourhood plans are not statutorily required to have a SA as they are not Development Plan Documents. However, undertaking SA is useful in identifying issues that may require a planning response, as well as in appraising the plan's impact, particularly if it allocates sites for development. A qualifying body must demonstrate how its plan or order will contribute to achieving sustainable development. The SA framework, including objectives prepared for assessing LPP1, has subsequently been updated for Local Plan Part 2 – Development Management and Allocations (LPP2) / a neighbourhood plan. A SA/SEA report is now being undertaken for LPP2.
- 1.5 The Denmead Neighbourhood Plan Group has requested a screening opinion for SEA. The environmental aspects of the LPP2 SA Framework prepared for WCC by independent sustainability specialists Enfusion Ltd has therefore been used to assess potential impacts to the environment for SEA purposes.
- 1.6 The SA/SEA should assess draft policies and proposed sites systematically to identify whether there are any significant adverse effects and, where possible, to identify means of offsetting these effects.

¹ All reports can be downloaded from www.winchester.gov.uk/planning-policy/sustainability-appraisals

2 STRATEGIC ENVIRONMENTAL ASSESSMENT SCREENING METHOD

- 2.1 The purpose of this screening opinion is to determine whether or not the contents of the Denmead Neighbourhood Plan requires a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004 (see 1.3).
- 2.2 The purpose of the neighbourhood plan is to allocate land for development in accordance with LPP1, in addition to preparing local policies to inform the location, type and appearance of new development.
- 2.3 A neighbourhood plan may require an SEA if it has ambitious content. The following focuses on screening for SEA and the criteria for establishing whether a full assessment is needed. The criteria* for determining the likely significance of effects referred to in Article 3(5) of Directive 2001/42/EC are:

(i) The characteristics of plans and programmes, having regard in particular to -

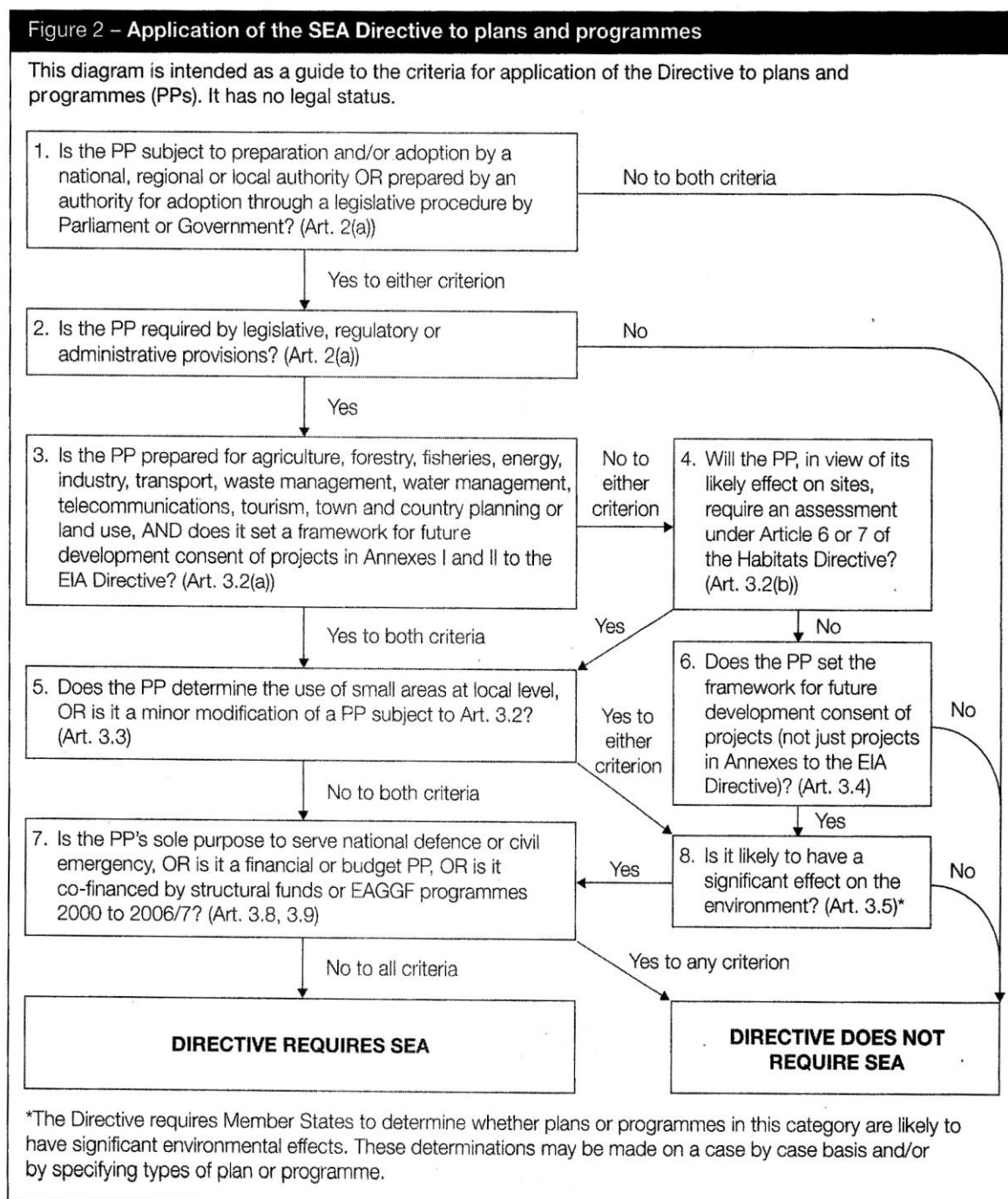
- the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources;
- the degree to which the plan or programme influences other plans and programmes including those in a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

(ii) Characteristics of the effects and of the area likely to be affected, having regard in particular to -

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

* Source: SEA Directive 2001/42/EC, Annex II

2.4 The diagram below illustrates the process for screening a planning document to ascertain whether a full SEA is required.



Source: *A Practical Guide to the SEA Directive*, ODPM 2005

2.5 The table below assesses whether the neighbourhood plan will require a full SEA. The questions are drawn from the diagram above which sets out how the SEA Directive should be applied.

Table 1: Establishing the Need for SEA		
Stage	Y/N	Reason
1. Is the PP (plan or programme) subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	Y	The Denmead Neighbourhood Plan is defined as a neighbourhood development plan under the Localism Act 2011, National Planning Policy Framework 2012 and Neighbourhood Planning Regulations 2012, and is to be prepared by the Parish Council as the qualifying body.
2. Is the PP required by legislative, regulatory or administrative provisions? (Art. 2(a))	Y	See above
3. Is the PP 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 consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))	Y	The neighbourhood plan will allocate land for development but of a relative scale to the size of the settlement.
4. Will the PP, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))	N	There are no likely significant effects on sites designated under the Habitats or Birds Directive. See section on biodiversity below for additional explanation.
5. Does the PP Determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art. 3.2? (Art. 3.3)	Y	The neighbourhood plan will be used to determine uses of areas within its designated plan area.
6. Does the PP set the framework for future development consent of projects (not just projects in EIA Directive annexes)? (Art 3.4)	?	Given the scale and nature of development it is unlikely that these will require consent under the EIA Directive.
7. Is the PP's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art. 3.8, 3.9)		N/A
8. Is it likely to have a significant effect on the environment? (Art. 3.5)	Y	See section 4.

3 ASSESSMENT OF SIGNIFICANT ENVIRONMENTAL EFFECTS

- 3.1 A Sustainability Appraisal framework has been devised by consultants *Enfusion* for assessing LPP2 or a neighbourhood plan. It will be applied to sites and policies for inclusion in the neighbourhood plan to determine how they contribute towards sustainability objectives. This framework allows for an objective assessment of all proposals and will highlight key sustainability issues to be addressed through the neighbourhood plan.
- 3.2 The environmental aspects of this framework have been used for the SEA screening, namely the sections on **Water**, **Biodiversity**, **Heritage** and **Landscape & Soils** as set out below.
- 3.3 Using the decision-aiding questions, the likely effects on the relevant SA Objective for the SEA were considered.

WATER

Is the site in Flood Zone 2 or 3?

Areas of the neighbourhood plan area fall within medium to high flood risk (zone 2 and/or 3).

Are there any known problems with flooding on the site?

This will need to be determined when sites are selected.

Is the site in a ground water protection zone, safeguarded zone, water protection zone and/or situated on a major aquifer with high/intermediate vulnerability?

Part of the neighbourhood plan area is within a groundwater protection zone, and overlies an aquifer with areas of major and intermediate vulnerability.

Is there potential for adverse effects on the quality of ground and surface water sources?

There is potential for adverse effects, as set out below. Avoidance and mitigation measures are set out in LPP1 Policy CP17. The initial SA undertaken for LPP1 considers that this policy '*could reduce negative effects to minor although this may be problematical and/or expensive*' for some of the sites. For other sites outside the flood zones and in areas of lower groundwater vulnerability, the SA considers the residual effects to be neutral if issues are addressed through the mitigation measures set out in CP17.

The potential for adverse effects on water sources from development arises from -

- Construction works & laying pipes/cables (surface & ground) - affecting water quality
- Topography alteration and changes to hydrological regime/water levels - affecting surface water runoff and water quality
- Increased hard standing and loss of permeable surfaces from development - affecting surface water drainage and water quality
- Changing volume of discharge and increased abstraction levels (new housing) - affecting drainage and water quality.

BIODIVERSITY

❑ Does the whole or part of the site or is the site near to a designated site (international, European, national or local)?

(International/European) The international (Ramsar) and European (Special Protection Areas [SPA] and Special Areas of Conservation [SAC]) sites are over 4.5km from the neighbourhood plan area. A Habitat Regulations Assessment has been undertaken on LPP1 and will also be undertaken for LPP2.

(National) There are no Sites of Special Scientific Interest (SSSI) in the neighbourhood plan area. The nearest are at Lye Heath Marsh and Catherington, both over 1km away.

(Local) There are a number of Sites of Importance for Nature Conservation (SINC) in the neighbourhood plan area.

❑ Does the site contain any protected species?

There is the potential for sites to have habitat suitable for protected species.

❑ Are there any locally valued habitats and or species (non-recorded biodiversity interests) present or adjacent?

The area around the settlement of Denmead is predominantly agricultural with some grade 3a, but mainly grades 3 and 4 quality. There are likely to be areas of mature hedgerows and possibly some standard trees. There are numerous Tree Preservation Orders and TPO areas within and around the main settlement.

❑ Could the site have any adverse impact on any designated sites or protected species and/ or on any locally valued habitats and species (non-recorded biodiversity interests)? Will development of this site affect any structure or features that could be habitats for protected species?

LPP1 Policy CP16 seeks to maintain and enhance the network of wildlife sites and corridors, support the integrity of the biodiversity network and prevent fragmentation.

Given the distance of the Ramsar and SPA/SAC sites from the neighbourhood plan area, there will be no direct loss of habitat or fragmentation of them. There are no known Brent Goose or wader sites within the vicinity of the plan area, nor are there SSSIs within or close to the neighbourhood plan area.

The Solent Disturbance and Mitigation Project looks at the impact of recreational disturbance on these designated sites alone and in-combination with other plans and projects. The project sets a 5.6km zone from the Ramsar and SPA/SAC sites to address in-combination impacts of disturbance from recreation, in which mitigation for recreational impacts will be required for the development of any additional dwelling. The southernmost area of the plan falls within the 'mitigation zone', although the existing settlement boundary and the majority of the sites submitted for consideration through LPP2 are outside this zone.

Any significant environmental effects are therefore likely to be SINCs, of which there are several within the plan area close to the main settlement and to BAP species/habitats and protected species.

Some of the sites may have habitat suitable for protected species. The LPP2 SA suggests that '*the likelihood of their occurrence is greater on the BAP sites, the SINC sites, and on areas with TPOs although they may also be present in other areas*'. There are also important habitat features in the plan area such as hedgerows, rivers and streams which function as important corridors.

The potential significant effects on the environment therefore include -

- Direct loss of locally important habitats through development
- Fragmentation of locally important habitats (e.g. SINCs and BAP sites)
- Loss of wildlife corridors between important habitats
- Disturbance of protected species through noise, light and water pollution stemming from new development.

HERITAGE

- ❑ ***Could the site have an adverse impact on the historic and archaeological environment (landscapes, sites, buildings and settings), including resources of local value?***

Scheduled Monuments: Three bell barrows and a bowl barrow are located on the western edge of the neighbourhood plan area.

Conservation Areas: None.

Listed Buildings: 18 grade II listed buildings within the neighbourhood plan area, of which 4 are within the settlement boundary, plus a grade II* listed building at Rookwood Farm. The assessment undertaken by Winchester's Historic Environment Team also highlight a number of sites submitted for consideration through the Strategic Housing Land Availability Assessment (SHLAA) which are adjacent to unlisted historic buildings and which would require further assessment of the impact on those buildings.

Archaeological sites (recorded and unrecorded): The Historic Environment Assessment has identified a number of the larger SHLAA sites as having unknown archaeological interest, but where, given the size of the sites, remains could survive *in situ* and further assessment would be required.

SHLAA site 302 at Anthill Common has great archaeological potential as there are extant earthworks of two mediaeval fishponds on the site. Other features associated with this water management system may survive across the area.

The area around Inhams Lane and west of Bunkers Hill also has high archaeological potential. Remains of Late Bronze and Iron Age activity have been recorded here. Late Bronze, Iron Age and Roman settlement and industrial remains have also been found west of Inhams Lane.

Other areas of high archaeological potential include -

- SHLAA site 958, within the settlement boundary at Green Lane, is the last surviving building of an historic farm complex.

- The area south of Forest Road (SHLAA site 2003), where Roman remains have been found and the area to the west where remains associated with a possible Late Iron Age/Early Romano-British industrial centre have been found immediately north of site 2425.

Historic Parks and Gardens: None.

Existing landscape and townscape character: See 'Landscape & Soils' below.

- The potential significant effects on the environment therefore include -
- Direct loss or impact on conservation features
 - Direct loss or impact on areas of high archaeological potential
 - Impact on scheduled monuments.

LANDSCAPE & SOILS

Could the site adversely impact on the landscape setting of the settlement?

The WCC Landscape Sensitivity Appraisal 2013 sets out the relevant landscape character, townscape and features for the neighbourhood plan area.

The landscape in the south-east of the plan area is categorised as 'most sensitive'. This area lies within the local gap and development here could have landscape and visual impacts on the effectiveness of the gap, biodiversity, visual amenity and water quality.

The southern area of Inhams lane and Anthill Common are 'highly sensitive' in terms of their biodiversity and existing landscape character.

Is the site classified as previously-developed land or greenfield?

Denmead will need to accommodate approximately 128 dwellings over the remainder of the local plan period (to 2031). Most of these are likely to be on greenfield land outside the currently defined settlement boundary.

Could the site contribute towards conserving and enhancing recognised built form and designed or natural landscapes that include features and elements of natural beauty, cultural or historic importance; local distinctiveness, especially in terms of characteristic materials, trees, built form and layout, tranquillity, sense of place and setting?

The Landscape Appraisal identifies that some undesignated areas within the Forest of Bere Lowlands Character Area could contribute significantly towards the setting of Denmead. There are also numerous Tree Preservation Orders in the neighbourhood plan area.

Could the use of site protect soil resources or would it result in the loss of high grade (1 - 3a) agricultural land?

The Landscape Sensitivity Appraisal identifies the land as predominantly low quality soils (grade 4) with some grade 3 areas. The area around Inhams Lane and the north-west edge of the settlement is higher grade agricultural land (grade 3a).

□ ***Is the site within a defined settlement gap?***

The area between Denmead, Cowplain and the West of Waterlooville Major Development Area to the south-east is defined as a settlement gap (LPP1 Policy CP18).

□ ***Is the site or part of the site underlain by mineral reserves? Is extraction possible within the timeframe of the plan or could it be extracted prior to development?***

There are no known mineral reserves under the neighbourhood plan area.

□ ***Is the site or part of the site in a Nitrate Vulnerable Zone?***

Part of the neighbourhood plan area is within a groundwater protection zone, and overlies an aquifer with areas of major and intermediate vulnerability.

The potential significant effects on the environment therefore include -

- Loss of higher grade agricultural land (grade 3a)
- Undermining of the effectiveness of the settlement gap
- Impact on landscape character and on contextual setting
- Loss of features/areas that contribute significantly to the setting of Denmead
- Loss of buffer between main built up area and Creech Wood
- Suburban fringe encroachment
- Loss of rural lane character
- Loss of trees with Tree Preservation Orders.

4 CONCLUSION

- 4.1 Winchester City Council recommends a Strategic Environmental Assessment be carried out for the Denmead Neighbourhood Plan to address the potential significant effects identified above in section 3.

5 SA FRAMEWORK: DECISION-AIDING QUESTIONS USED FOR SEA SCREENING OPINION.

5.1 This section sets out the 'decision-aiding questions' from the LPP2 SA framework which are considered relevant to the SEA and have been used to formulate the Screening Opinion.

5.2 The questions have been formulated as follows -

- Identifying appropriate policies in LPP1 which set out requirements for sites to adhere to and removing the questions which refer to those requirements
- Where 'decision aiding questions' from LPP1 address effects along with those covered by higher level policies, they have been amended to make them more relevant to the site (shown in blue)
- Where appropriate, inserting relevant assessment criteria from the LPP2 Site Selection Checklist (shown in red)
- Additional questions (shown in green).

	SUSTAINABILITY APPRAISAL (SA) OBJECTIVE	DECISION-AIDING QUESTIONS - LOCAL PLAN PART 1 (ALSO TO BE USED FOR POLICIES IN LOCAL PLAN PART 2 OR A NEIGHBOURHOOD PLAN	DECISION-AIDING QUESTIONS FOR SITE ALLOCATIONS IN LOCAL PLAN PART 2 OR A NEIGHBOURHOOD PLAN
7	Water SEA topics: Water, Climatic Factors, Biodiversity, Health		
	To protect, enhance and manage water resources in a sustainable way	Does the option/policy: <ul style="list-style-type: none"> • Require the use of water efficiency measures • Manage and minimise risk of flooding including regard to future climate change (promotion of adaptation measures) • Promote the adoption and use of sustainable drainage systems • Protect the quality & quantity of ground and surface water sources • Progress compatibility with the objectives of the Water Framework Directive • Promote access to water for recreation, enjoyment and understanding (including valued biodiversity/habitats) 	All proposed sites are required to meet LPP1 Policies CP11 - <i>Sustainable Low and Zero Carbon Built Development</i> ; DS1 - <i>Development Strategy and Principles</i> ; and CP17 - <i>Flooding, Flood risk and the Water Environment</i> . <ul style="list-style-type: none"> ▪ Is the site Flood Zone 2 or 3? ▪ Are there any known problems with flooding on the site? ▪ Is the site in a ground water protection zone, safeguarded zone, water protection zone and/or situated on major aquifer with high/intermediate vulnerability? ▪ Is there potential for adverse effects on the quality of ground and surface water sources?
11	Biodiversity SEA topics: Biodiversity, Fauna and Flora		
	To conserve and enhance biodiversity	Does the option/policy: <ul style="list-style-type: none"> • Protect and enhance designated and locally valued habitats and species • Prevent and reverse habitat fragmentation, where possible promote understanding of and access to biodiversity • Provide opportunities for provision and enhancement of a network of green spaces 	All proposed sites are required to meet LPP1 Policies CP16 - <i>Biodiversity</i> ; DS1 - <i>Development Strategy and Principles</i> ; and CP15 - <i>Green Infrastructure</i> . <ul style="list-style-type: none"> ▪ Does the whole or part of the site or is the site near to a designated site (international, European, national or local)?

			<ul style="list-style-type: none"> ■ Does the site contain any protected species? ■ Are there any locally valued habitats and or species (unrecorded biodiversity interests) present or adjacent, for example, mature hedgerows, traditional orchards, veteran trees etc.? <p>Could the site:</p> <ul style="list-style-type: none"> ■ Have any adverse impact on any designated sites or protected species (International, European, National or Local) and/ or on any locally valued habitats and species (unrecorded biodiversity interests)? ■ Have potential to enhance designated and locally valued habitats and species? ■ Provide space to reverse habitat fragmentation? ■ Provide opportunities for the provision and enhancement of a network of green spaces using an ecosystems approach? ■ Are there streams, rivers, lakes or other watercourses/ aquatic habitat on or within 200m of the site²? ■ Is the site within 500m of a large³ pond? ■ Affect any structures or features that could be habitats for protected species?
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² Hampshire & Isle of Wight Chief Planning Officers Group (No date) Biodiversity Checklist. Online at <http://www.hampshirebiodiversity.org.uk/1app.htm> [Accessed May 2013]

³ Where the surface area of the pond, when water is at its highest level (excluding flood events), is 225m² (c. 15m x 15m)

12	Heritage SEA topics: Cultural Heritage		
	To protect and enhance built and cultural heritage	<p>Does the option/policy:</p> <ul style="list-style-type: none"> • Protect and where appropriate, enhance the historical and archaeological environment (landscapes, sites, buildings and settings), including resources of local value • Support, develop and where appropriate, enhance and increase access to cultural and heritage resources and activities • Help accommodate new development without detriment to the existing built and cultural heritage 	<p>All proposed sites are required to meet LPP1 Policies CP20 - <i>Heritage and Landscape Character</i> and DS1 - <i>Development Strategy and Principles</i>.</p> <ul style="list-style-type: none"> ▪ Does the site contain or is it close to heritage assets including: <ul style="list-style-type: none"> - Scheduled Monuments - Conservation Areas - Listed Buildings - Archaeological sites (recorded and non-recorded) - Historic Parks and Gardens - Existing landscape and townscape character? ▪ Would the use of the site increase access to local cultural and heritage resources and activities? ▪ Could the site accommodate new development without detriment to the existing local built and cultural heritage? ▪ Could the site have an adverse impact on the historical and archaeological environment (landscapes, sites, buildings and settings), including resources of local value? ▪ Could the site enhance the historical and archaeological environment (landscapes,

			sites, buildings and settings), including resources of local value?
13	Landscape & Soils SEA topics: Landscape, Soils		
	To protect and enhance the character and quality of the landscape of Winchester District	<p>Does the option/policy:</p> <ul style="list-style-type: none"> • Minimise adverse impact on the landscape setting of the city, towns and rural settlements • Prioritise the use of previously-developed land to minimise greenfield development • Conserve and enhance the natural beauty of the AONB, South Downs National Park, and locally designated landscapes • Protect soil resources and manage in a sustainable way 	<p>All proposed sites are required to meet LPP1 Policy CP20 - <i>Heritage and Landscape Character</i>.</p> <ul style="list-style-type: none"> ▪ Could the site adversely impact on the landscape setting of the city, towns and rural settlements? ▪ Is the site classified as previously developed land or greenfield? Prioritise the reuse of previously-developed (brownfield) land, provided it is not of high environmental value. ▪ Could the site contribute towards conserving and enhancing: <ul style="list-style-type: none"> - recognised built form and designed or natural landscapes that include features and elements of natural beauty, cultural or historic importance; - local distinctiveness, especially trees, built form and layout, characteristic materials, tranquillity, sense of place and setting. ▪ Could the use of the site protect soil resources or would it result in the loss of high grade (1 - 3a) agricultural land? ▪ Is the site within a defined settlement gap? ▪ Is the site or part of the site underlain by mineral reserves? Is extraction possible within the timeframe of the plan or could it be extracted prior to development?

			<ul style="list-style-type: none">▪ Is the site or part of the site in a Nitrate Vulnerable Zone?
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