

Strategic Environmental Assessment (SEA) for the Much Hadham Neighbourhood Plan

Environmental Report

Much Hadham (East Herts)

August 2020

Quality information

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Table of Contents

Non-Technical Summary	
1. Introduction.....	1
2. What is the plan seeking to achieve?	3
3. What is the scope of the SEA?.....	6
Part 1: What has plan-making/ SEA involved up to this point?.....	
4. Introduction (to Part 1).....	9
5. Establishing the reasonable alternatives	10
6. Assessing reasonable alternatives	32
7. Developing the preferred approach.....	34
Part 2: What are the SEA findings at this stage?	
8. Introduction (to Part 2).....	36
9. Appraisal of the 'pre-submission' version MHNP	38
10. Conclusions and recommendations	45
Part 3: What are the next steps?.....	
11. Next steps (Part 3)	47
Appendices	
Appendix I: Regulatory requirements	49
Appendix II The scope of the SEA	50
Appendix III Reasonable alternatives assessment	55

Non-Technical Summary

Introduction

AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of the emerging Much Hadham Neighbourhood Plan (MHNP).

SEA is a mechanism for considering and communicating the likely significant effects of an emerging plan, and reasonable alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding or mitigating negative environmental effects and maximising positive effects. Through this approach, the SEA for the Much Hadham Neighbourhood Plan seeks to maximise the emerging Neighbourhood Plan's contribution to sustainable development.

The Environmental Report will be submitted to East Hertfordshire District Council (EHDC) alongside the Neighbourhood Plan for subsequent Independent Examination.

Structure of the Environmental Report and this NTS

SEA reporting essentially involves answering the following questions in turn:

What has plan-making / SEA involved up to this point?

- Including in relation to 'reasonable alternatives'.

What are the SEA findings at this stage?

- i.e. in relation to the Draft Plan

What happens next?

- What steps will be taken to finalise (and monitor) the Plan?

Each of these questions is answered in turn below. Before answering the first question however, two initial questions are answered in order to further set the scene – i) what is the Plan seeking to achieve?; and ii) what is the scope of the SEA?

What is the Plan seeking to achieve?

The Much Hadham Neighbourhood Plan is being prepared in the context of the adopted East Hertfordshire Development Plan which comprises the following documents:

- East Hertfordshire District Plan (2018)¹;
- Hertfordshire Minerals Local Plan (2007)²;
- Hertfordshire Waste Core Strategy (2012) and Waste Site Allocations Document (2014)³;
- Adopted Supplementary Planning Documents (SPDs); and
- Any 'made' Neighbourhood Plans.

The Much Hadham Neighbourhood Plan must be in general conformity with the strategic policies of the Development Plan, as per footnote 16 of the National Planning Policy Framework (NPPF) (2019).

The key document in relation to the Much Hadham Neighbourhood Plan is the **East Hertfordshire District Plan**, adopted in 2018. District Plan Policy DPS3 (Housing Supply) of the District Plan sets Much Hadham a housing target of **54 dwellings** to deliver between 2017 and 2033.

The supporting text of District Plan Policy VILL1 (Group 1 Villages) is clear that this target represents "*the minimum number of homes*" that Much Hadham will need to accommodate, and that

¹ <https://www.eastherts.gov.uk/planning-building/east-herts-district-plan/east-herts-district-plan-2018>

² Currently under review.

³ <https://www.eastherts.gov.uk/planning-building/planning-policy/minerals-and-waste-planning>

“development in excess of the minimum number indicated may be considered appropriate, depending on site availability, site suitability and upon the capacity of infrastructure to meet the additional demand that arises”. In this context, delivery of housing is a key goal for the Neighbourhood Plan.

Additionally, as part of the development of the MHNP, the community of Much Hadham have set out the following vision for the parish:

“Much Hadham parish will remain an attractive locality with beautiful surrounding countryside, and will preserve its distinctive rural character, scale and atmosphere”.

This vision is supported by a set of 11 detailed objectives which form the basis of the policies contained in the MHNP.

What is the scope of the SEA?

The SEA Regulations require that “when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.⁴ As such, the Scoping Report was released to these authorities for consultation between the period of 31/03/2020 to 05/05/2020.

Comments received on the Scoping Report, and how they have been considered and addressed, are presented in Appendix II of this report. The issues identified through the Scoping process were then translated into an ‘SEA framework’. This SEA framework provides a methodological framework for the appraisal of likely significant effects on the baseline. The framework is summarised in Table NTS1 below:

Table NTS1 The SEA framework

SEA theme	SEA objective
Biodiversity	Protect and enhance all biodiversity and geodiversity.
Climate change (mitigation and adaptation)	Continue to decrease GHG emissions and increase the resilience of the Neighbourhood Plan area to the effects of climate change.
Landscape	Protect and enhance the character and quality of landscapes
Historic environment	Protect, conserve and enhance the historic environment within the Neighbourhood Plan area.
Land, soil and water resources	Ensure the efficient and effective use of land, protect soil quality and avoid the loss of high-quality agricultural land.
	Use and manage water resources in a sustainable manner.
Population and community	Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.
	Reduce deprivation and promote an inclusive and self-contained community, maximising access to local, high-quality community services and facilities.
Health and wellbeing	Improve the health and wellbeing of residents within the Neighbourhood Plan area.
Transportation	Promote sustainable transport use and reduce the need to travel.

⁴ In line with Article 6(3) of the SEA Directive, these consultation bodies were selected “by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes”.

What has plan-making/ SEA involved up to this point?

Plan-making has been underway since Much Hadham was declared a Neighbourhood Area by East Herts District Council (EHDC) in September 2015.

Subsequently, the Parish Council has made significant progress on the preparation of both the Neighbourhood Plan and the evidence base which underpins it, culminating in a draft of the plan undergoing Regulation 14 (pre-submission) consultation between August and September 2019. Full details of the consultation undertaken to date can be found in the Consultation Statement that accompanies the Neighbourhood Plan.

This SEA environmental report accompanies the submission version of the Neighbourhood Plan. The findings of the SEA have informed and influenced the development of the submission version of the Neighbourhood Plan.

The District Plan identifies that Much Hadham must deliver **at least 54 dwellings** between 2017 and 2033, though does not make any site allocations in the parish at which to direct this growth. Delivery of this housing target must therefore be achieved via the Neighbourhood Plan.

Since the base date of 2017 there have been a total of 19 housing completions and a further four commitments in Much Hadham, leaving a **residual housing need of 31** to be met through the Neighbourhood Plan.

Site options

In this context, the Parish Council has sought to identify site options to test for potential allocation through the Neighbourhood Plan.

Site options have been identified from two sources. Firstly, the 2017 East Herts Strategic Land Availability Assessment (SLAA) was reviewed for sites within the parish identified by EHDC. Secondly, a call for sites exercise was undertaken by the Parish Council in order to ensure that as broad a search as possible has been undertaken.

In total, this process yielded an **initial longlist of 18 potential site options**.

A systematic sifting exercise was undertaken by the Parish Council to refine this longlist of 18 sites down to a shortlist of sites for more detailed further testing. Sites were sifted out of consideration if one or more of the following criteria applied:

- a) Site availability cannot be demonstrated, i.e. there is no recent evidence of landowner support for development;
- b) The site is neither within nor adjacent to the defined settlement boundary; and
- c) New development at the site has already commenced or been completed.

This process **sifted out a total of nine sites**, whilst the remaining sites, summarised below, progressed to more detailed further testing through the Parish Council's site assessment exercise.

Table NTS2 Site options identified for testing through the Parish Council's site assessment

Site name	Source	Site area (ha)	Max potential yield ⁵
Priest House	Call for sites	0.26	12
Land at Hopley's	Call for sites	0.74	6

⁵ The area and maximum potential yield for each site are taken from the Parish Council's Site Assessment Results Summary with the exception of the Allotments and Land Behind Windmill Way which are taken from the EHDC SLAA.

Land at the former Barn School	Call for sites	3.38	30
The Bull Inn	Call for sites	0.37	10
Moor Place Gate (both sides)	Call for sites	1.13	20
Moor Place Gate (south side)	Call for sites	0.56	10
South Plot, Culver	Call for sites	0.66	4
Land north of Kettle Green Lane	Call for sites	3.75	20
Land behind Windmill Way (SLAA ref 33/015a)	EHDC SLAA	0.57	14

Summary of the Parish Council's site assessment

Methodology

After the longlist of sites had undergone the initial sift as outlined above, the remaining ten sites were tested against 14 detailed assessment criteria to assign an overall rank based on their suitability, availability and achievability/viability.

Each site was assigned a score out of 4 in relation to each criterion, with 4 being the strongest score and 0 being the weakest. A maximum possible score of 56 was achievable.

Results summary

The Parish Council's site assessment ranked the sites in the following order of suitability:

Site name	Score (maximum of 56)	Rank
Priest's House	45	=1
Land at Hopley's	45	=1
Land at the former Barn School	44	=2
Moor Place Gate (south side)	44	=2
The Bull Inn	43	=3
South Plot, Culver	43	=3
Moor Place Gate	42	7
Land behind Windmill Way	31	8
Land north of Kettle Green Lane	26	9

Additional technical evidence

The pre-submission (Regulation 14) draft of the Neighbourhood Plan proposed allocation of Moor Place Gate (south side) and South Plot, Culver.

At Regulation 14 consultation, Historic England identified that they would likely object to the plan if it were to propose allocation of either site at Moor Place Gate, i.e. either the whole site or just the south side of the site. This position was based on what HE viewed as unacceptable harm which would result from development at such a sensitive location.

Separately, extant planning permission at the site at South Plot, Culver has been implemented since the pre-submission draft of the Neighbourhood Plan was prepared.

Taking the above into account, it is considered that neither Moor Plate Gate, Moor Place Gate (south side) or South Plot, Culver can be considered further for allocation.

Therefore, **the remaining total of six sites** were tested through the SEA:

- Priest House;
- Land at Hopley's;
- Land at the former Barn School;
- The Bull Inn;
- Land behind Windmill Way; and
- Land north of Kettle Green Lane.

SEA site assessment findings

The SEA site assessment tests every site in relation to each of the SEA themes (e.g. biodiversity, climate change etc). **It is important to note that the SEA themes are not assumed to be of equal weight.** Therefore, evaluating the overall performance of each site is more nuanced than simply reconciling the overall number of positive scores against the overall of negative scores and judgement must be applied as to which of the themes attract the greatest weight in the context of each site.

A summary of the findings of the SEA assessment of potential site options is presented below:

Table NTS3 Summary of SEA site assessment findings

Site	Biodiversity	Climate change	Landscape	Historic Environment	Land, soil and water resources	Population and community	Health and wellbeing	Transport
Priest House								
Hopley's								
Barn School								
Bull Inn								
Windmill Way								
Land at KGL								
Key								
Likely adverse effect (without mitigation measures)					Likely positive effect			
Neutral/no effect					Uncertain effects			

Commentary on the SEA site assessment

The SEA site assessment finds that all sites perform well overall in relation to the population and communities theme, whilst all sites are anticipated to lead to neutral effects in relation to climate change.

The rich historic environment of Much Hadham is considered to give rise to potential adverse effects (without mitigation) at the former Barn School, the Bull Inn and Land north of Kettle Green Lane. Land at Hopley's stands out as the only site which records an uncertain effect in relation to the historic environment, on the basis that as a partly previously developed site the degree to which effects differ from those of existing development will be determined by the design and layout of a future scheme.

Land behind Windmill way stands out as notably poorly performing in relation to the transport SEA objectives on the basis that achieving safe vehicular access appears to be unfeasible. Land north of Kettle Green Lane does not support walking and cycling access to the village centre via car-free paths and consequently also scores poorly in relation to transport.

Establishing reasonable alternatives

In light of the above findings of the SEA site assessments and the findings of the Parish Council's separate site assessment process, the reasonable alternatives for Much Hadham are considered to be as follows:

- **Option 1:** Priest House + Land at Hopley's + The Bull Inn + Land at Former Barn School = 21 dwellings plus reserve site. MHPC preferred option (PO).
- **Option 2:** PO *minus* Land at Former Barn School = 21 dwellings;
- **Option 3:** PO *plus* Land behind Windmill Way = 37 dwellings;
- **Option 4:** PO *plus* Land north of Kettle Green Lane = 41 dwellings.

Assessment of reasonable alternatives

For each one of Options 1-4, the appraisal of reasonable alternatives examines likely significant effects on the baseline, drawing on the SEA objectives identified through scoping as a methodological framework. The intention is to distinguish between each of the alternative options in relative terms, i.e. test their performance under each SEA theme in relation to one another. Judgement must then be applied as to which option performs strongest overall.

Under each SEA theme (e.g. 'Biodiversity'), the appraisal looks to differentiate between the performance of the options in relation to the relevant SEA objectives. Where differentiation is possible, the options' relative performance is ranked in order of preference with '1' indicating strongest performance.

Where it is not possible to meaningfully differentiate between the options, their broadly equal performance is indicated with a '=' symbol.

Potential significant effects are indicated with highlighted text. **Green** is used to indicate significant positive effects, whilst **Red** is used to indicate significant negative effects.

It is important to note that the assessment **does not assume** that each of the SEA themes are of equal weight. Therefore, establishing which option is strongest performing overall is not simply a question of tallying the individual scores achieved under each SEA theme. Judgement must be applied as to which SEA themes attract greatest weight in the context of Much Hadham and therefore which of the reasonable alternative options is most suitable for consideration as the preferred approach.

A summary of the reasonable alternatives appraisal is presented in Table NTS4:

Table NTS4 Summary alternatives assessment findings

SEA Theme	Option 1 <i>Priest House + Hopley's + Bull Inn + Barn School (reserve site)</i>	Option 2 <i>Option 1 minus Barn School</i>	Option 3 <i>Option 1 + Land behind Windmill Way</i>	Option 4 <i>Option 1 + Land north of Kettle Green Lane</i>
Biodiversity	=	=	=	=
Climate change	=	=	=	=
Landscape	1	1	2	3
Historic environment	1	1	1	2
Land, soil and water resources	1	1	2	2
Population and community	3	3	2	1
Health and wellbeing	=	=	=	=
Transport	1	1	2	2

Developing the Preferred Approach

Following a review of the evidence and consideration of community aspirations for the area, the MHNP proposes to pursue Option 1 and allocate three sites for a total of at least 21 net new dwellings, plus a reserve site to be brought forward once it becomes available:

- **Priest House**, allocated for the development of at least seven (net) new dwellings of mixed housing type;
- **Land at Hopley's**, allocated for the development of at least nine new dwellings, the majority of which should be 2 or 3 bedrooms.
- **The Bull Inn**, allocated for the development of at least five new dwellings, which should all be smaller, single storey homes.
- **Hill House and land to the rear (formerly known as Barn School)**, allocated as a reserve site with potential to be brought forward for development of around 25 homes once it becomes available at an as yet unknown future date.

The proposed allocation of these sites is informed by all of the available evidence, including extensive engagement with the community, the conclusions of the Parish Council's site assessment exercise, the Regulation 14 consultation responses, additional ongoing engagement with Historic England and with consideration of the findings of the SEA.

The findings of the SEA have informed and influenced the preferred approach as follows:

- When considered against reasonable alternatives, the SEA finds that the proposed package of sites performs most strongly overall. Whilst potential historic environment sensitivity was identified at **the Bull Inn** and at **Hopley's**, the plan proposes policy mitigation which is considered to be satisfactory in minimising the risk of harm.
- Conversely, an alternative approach of allocating **Land north of Kettle Green Lane** was considered very likely to give rise to significant negative effects, the mitigation of which would be inherently problematic and unlikely to be achievable.

- The final alternative approach of allocating **Land behind Windmill Way** was also found to have substantial problems which have no clear mitigation, this time in relation to highly constrained vehicular access. The absence of safe vehicular access is considered to make Land behind Windmill Way unsuitable for allocation and a poor location at which to deliver development.

Therefore, the Parish Council considers that Option 3 is not viable, whilst the under-delivery of housing through the preferred approach is considered to outweigh the potentially significant harm to the historic landscape setting of the village and its principal built and cultural heritage assets which would result under Option 4.

What are the SEA findings at this stage?

This part of the report presents an assessment of the current pre-submission version of the Neighbourhood Plan, i.e. the likely effects of the proposed policies and allocations, including taking account of policy mitigation where potential for effects have been identified.

MHNP policies

The Neighbourhood Plan contains 28 policies, organised into 10 thematic chapters. These are presented in Table NTS5 below:

Table NTS5 List of policies in the Much Hadham Neighbourhood Plan

Policy theme	Policy
Housing	MH H1 Village Housing Number
	MH H2 Village Development Boundary
	MH H3 Type and Mix of Housing
	MH H4 Priest House
	MH H5 Land at Hopley's
	MH H6 The Bull Inn
	MH H7 Sites allocated with planning permission
	MH H8 Specialist Housing for Older and Vulnerable People
	MH H9 Hill House and Land to the Rear (formerly known as Barn School)
Design	MH D1 Design of New Development
	MH D2 Sustainable Design
	MH D3 Vehicle Parking Provision
	MH D4 Domestic Gates
	MH D5 Bin Storage
Infrastructure, Transport and Communications	MH ITC1 Infrastructure, Transport and Communications
Local Economy and Employment	MH ET1 Economic Development
	MH ET2 Visitor Economy
Heritage Assets	MH HA1 Moor Place
	MH HA2 Non-Designated Heritage Assets
	MH HA3 Valued Community Assets and Assets of Community Value
	MH LNE1 Wildlife Sites and Green Corridors

Policy theme	Policy
Landscape and Natural Environment	MH LNE2 River Ash
Green Spaces	MH LGS1 Local Green Spaces
Priority Views	MH PV1 Priority Views
Community Facilities, Leisure and Recreation	MH CFLR1 Unclassified Roads
	MH CFLR2 Equine Development
	MH CFLR3 Recreational Open Space
Delivery and Monitoring	MH SP1 Funding Priorities

Assessment of the submission version of the MHNP

The assessment of the submission version of the MHNP identifies potential for positive effects, though these effects are not likely to be significant in their magnitude. The appraisal has not identified the potential for significant negative effects from the MHNP's proposed policies and allocations. The SEA themes found to be most sensitive to development in the MHNP area are historic environment and landscape.

Key findings are:

- In relation to the historic environment, a key concern is avoiding harm to the village's conservation area and its high grade listed assets (Grade II* and Grade I), notably Moor Place and Much Hadham Hall which are nearest to the proposed site allocations. Overall, the policies as applied to the proposed site allocations are likely to be effective in mitigating and avoiding specific harm, whilst the policies of the Neighbourhood Plan as a whole are considered likely to avoid harm to the historic environment more broadly, including the Much Hadham conservation area.
- In terms of landscape, a key concern is avoiding harm to the rural setting and context of the village and Much Hadham's distinctive and attractive villagescape character. Again, the policies of Neighbourhood Plan are considered likely to deliver growth which does not result in adverse effects to how the village is perceived within the landscape or to the character of its built area.
- The shortfall in meeting identified housing need stands out as a notable feature of the MHNP. However, it is recognised that this should be seen in the context of significant constraints at other available sites and the potential for the reserve site to come onstream over the plan period which would unlock additional land supply sufficient to meet and exceed housing needs.
- Minor positive effects are anticipated in relation to the: biodiversity; landscape; historic environment; population and communities; health and wellbeing; and transportation SEA themes.
- Neutral effects are anticipated in relation to the: climate change and land, soil and water resources SEA themes.
- Potential negative effects are not identified in relation to any of the SEA themes.

Overall it is considered that the MHDC takes a proportionate approach to delivering sustainable new development where possible, whilst protecting key aspects of the natural, built and historic environment that contribute to the overall sense of place and quality of life in the Much Hadham.

What are the next steps at this stage?

Plan finalisation

This Environmental Report accompanies the submission version of the Much Hadham Neighbourhood Plan for submission to the Local Planning Authority, East Herts District Council, (EHDC) for subsequent Independent Examination.

At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the adopted East Hertfordshire District Plan.

If Independent Examination is favourable, the Much Hadham Neighbourhood Plan will be subject to a referendum, organised by EHDC. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the Much Hadham Neighbourhood Plan will become part of the Development Plan for East Herts, covering the defined Neighbourhood Plan area.

Monitoring

The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the MHNP to identify any unforeseen effects early and take remedial action as appropriate.

It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by EHDC as part of the process of preparing its Annual Monitoring Report (AMR).

The SEA has not identified any potential for significant negative effects that would require closer monitoring.

1. Introduction

Background

- 1.1 AECOM has been commissioned to undertake Strategic Environmental Assessment of the Much Hadham Neighbourhood Plan on behalf of Much Hadham Parish Council. The work undertaken was agreed with the Parish Council and the Ministry of Housing, Communities and Local Government (MHCLG) in 2019 as part of the national Neighbourhood Planning Technical Support Programme led by Localita.
- 1.2 The Much Hadham Neighbourhood Plan has been prepared as a Neighbourhood Development Plan under the Localism Act 2011. The Neighbourhood Plan is being prepared in the context of the adopted East Hertfordshire District Plan (2018).
- 1.3 The Neighbourhood Plan has already undergone Regulation 14 consultation and was screened-in for SEA at an advanced stage of plan-making. Nevertheless, the Plan will have regard for the findings of the SEA as necessary. It is anticipated that the Plan will be submitted to East Hertfordshire District Council in Summer/ Autumn 2020.
- 1.4 Key information relating to the Much Hadham Neighbourhood Plan is presented in Table 1.1 below:

Table 1.1 Much Hadham Neighbourhood Plan Key Facts

Name of Responsible Authority	Much Hadham Parish Council
Title of Plan	Much Hadham Neighbourhood Plan
Subject	Neighbourhood planning
Purpose	<p>The Much Hadham Neighbourhood Plan has been prepared as a Neighbourhood Development Plan under the Localism Act 2011 and Neighbourhood Planning (General) Regulations 2012. The plan must be in general conformity with East Hertfordshire District Council's adopted District Plan.</p> <p>The Neighbourhood Plan will be used to guide and shape development within the Much Hadham Neighbourhood Plan area.</p>
Timescale	2017 - 2033
Area covered by the plan	The Neighbourhood Plan area covers the parish of Much Hadham in Hertfordshire (see Figure 1.1).
Summary of content	The Neighbourhood Plan sets out a vision, strategy and range of policies for the Neighbourhood Plan area, including site allocations for development.
Plan contact point	<p>Ian Hunt, Much Hadham Neighbourhood Plan Steering Group Chairman</p> <p>Email address: ianhunt@muchhadhamparishcouncil.co.uk</p>

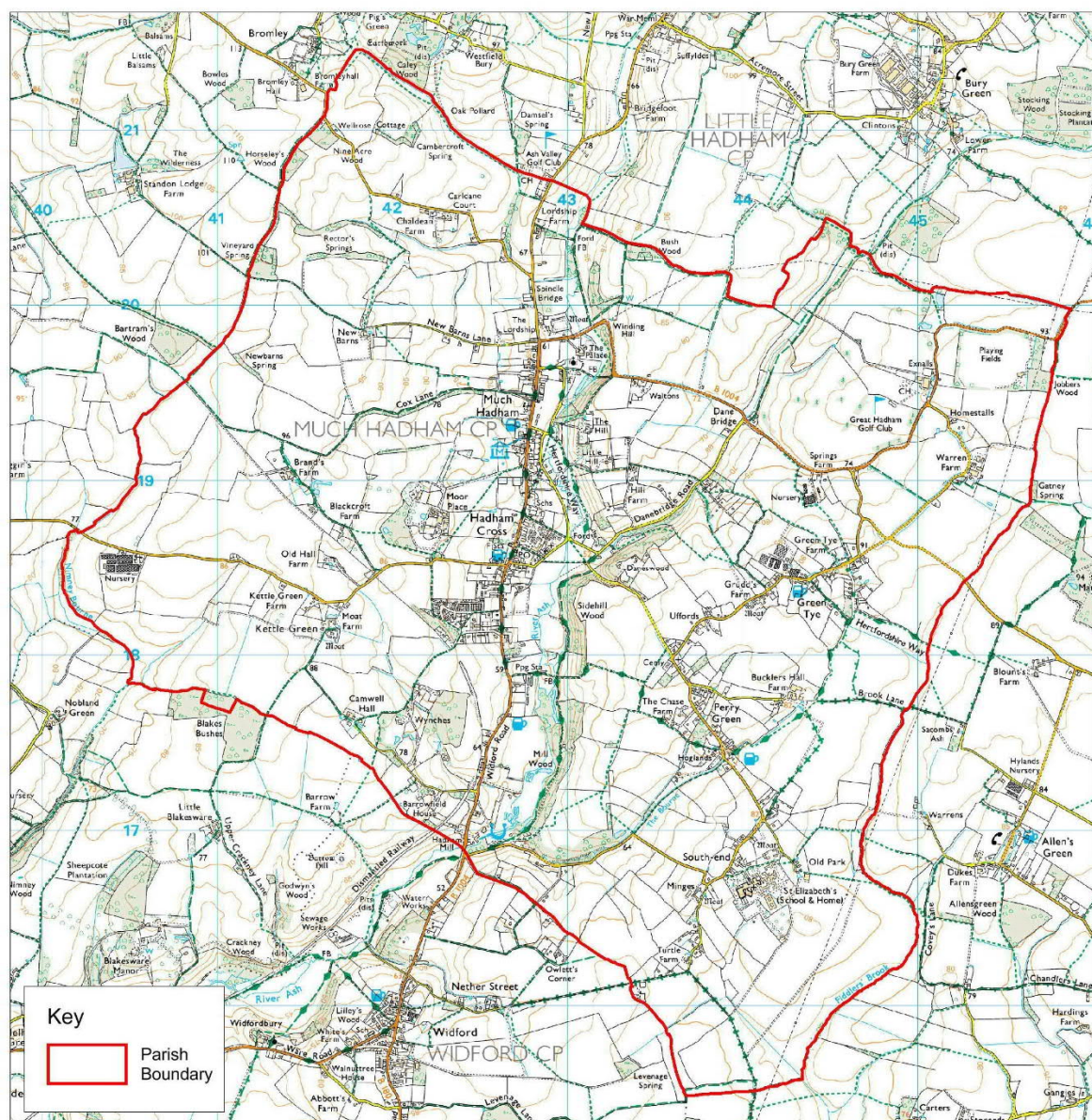
SEA explained

- 1.1 The Much Hadham Neighbourhood Plan has been screened in by East Herts District Council as requiring SEA due to the potential for significant environmental effects from site allocations within the Neighbourhood Plan area.
- 1.2 SEA is a mechanism for considering and communicating the likely significant effects of an emerging plan, and reasonable alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding or mitigating negative environmental effects and maximising positive effects. Through this approach, the SEA for the Much Hadham Neighbourhood Plan seeks to maximise the emerging Neighbourhood Plan's contribution to sustainable development.
- 1.3 The SEA has been prepared in conformity with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transpose into national law the EU Strategic Environmental Assessment (SEA) Directive⁶. This has included an initial scoping stage, consulted upon with Statutory Consultees; Natural England, Historic England and Environment Agency.⁷
- 1.4 The SEA Regulations require that a report (known as the **Environmental Report**) is published for consultation alongside the draft plan that 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.5 More specifically, the Report must answer the following three questions:
 1. What has plan-making/ SEA involved **up to this point**?
 - Including in relation to 'reasonable alternatives'
 2. What are the appraisal findings **at this stage**?
 - i.e. in relation to the draft plan.
 3. What happens **next**?
- 1.6 This report essentially answers questions 1, 2 and 3 in turn, in order to provide the required information.⁸ Each question is answered within a discrete 'part' of the report. Before answering Q1, two initial questions are answered in order to further set the scene; what is the plan seeking to achieve? And what is the scope of the SEA? Figure 1.1 The Much Hadham Neighbourhood Plan Area

⁶ Directive 2001/42/EC

⁷ Further information on the scope of the SEA is provided in Chapter 3

⁸ See **Appendix I** for further explanation of the regulatory basis for answering certain questions within the Environmental Report, and a 'checklist' explaining more precisely the regulatory basis for presenting certain information

Figure 1.1 Much Hadham Neighbourhood Plan Area⁹

⁹ East Herts District Council (2015), available from: <https://cdn-eastherts.onwebcurl.com/s3fs-public/2019-08/Much%20hadham%20Parish%20Boundary.pdf>

2. What is the plan seeking to achieve?

Introduction

- 2.1 This chapter sets out the key aims and objectives of the Much Hadham Neighbourhood Plan and the local planning policy context in which the Neighbourhood Plan is being prepared.

Relationship with the East Herts Development Plan

- 2.2 The Much Hadham Neighbourhood Plan is being prepared in the context of the adopted East Hertfordshire Development Plan which comprises the following documents:
- East Hertfordshire District Plan (2018)¹⁰;
 - Hertfordshire Minerals Local Plan (2007)¹¹;
 - Hertfordshire Waste Core Strategy (2012) and Waste Site Allocations Document (2014)¹²;
 - Adopted Supplementary Planning Documents (SPDs); and
 - Any 'made' Neighbourhood Plans.
- 2.3 The Much Hadham Neighbourhood Plan must be in general conformity with the strategic policies of the Development Plan, as per footnote 16 of the National Planning Policy Framework (NPPF) (2019).¹³
- 2.4 The key document in relation to the Much Hadham Neighbourhood Plan is the East Hertfordshire District Plan, adopted in 2018. The District Plan provides the framework for development in the district over the period 2011-2033, including setting an overall quantum of housing and employment growth to be delivered and a spatial strategy for distributing this growth.
- 2.5 The housing requirement for East Herts over the plan period 2011-2033 is identified as **18,458** new homes, or 839 dwellings per annum (dpa). The District Plan is clear that "*the Council is committed to meeting its full Objectively Assessed Housing Need*".
- 2.6 The development strategy established by the District Plan directs the majority of this growth to the largest settlements in the district on the basis that these are the most sustainable locations for growth in terms of access to services, facilities, employment and transport. The hierarchy underpinning the development strategy is set out in Policy DPS2 of the District Plan, presented in Figure 2.1 below:

Figure 2.1 East Hertfordshire Development Strategy Hierarchy 2011-2033

- 
- Sustainable brownfield sites;
 - Sites within the urban areas of Bishop's Stortford, Buntingford, Hertford, Sawbridgeworth and Ware;
 - Urban extensions to Bishop's Stortford, Hertford, Sawbridgeworth and Ware, and to the east of Stevenage, east of Welwyn Garden City and in the Gilston Area; and
 - Limited development in the villages.

- 2.7 For the purposes of distributing growth, the only villages provided a housing target through the District Plan are 'Group 1 Villages' (as per Policy DPS3 [Housing Supply 2011-2033]). Forty-four villages across of the district were assessed against a range of sustainability criteria in the

¹⁰ <https://www.eastherts.gov.uk/planning-building/east-herts-district-plan/east-herts-district-plan-2018>

¹¹ Currently under review.

¹² <https://www.eastherts.gov.uk/planning-building/planning-policy/minerals-and-waste-planning>

¹³ MHCLG (2019), National Planning Policy Framework [online], available from: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf#page=12

2016 Village Hierarchy Study, with the highest scoring eight being designated as Group 1, i.e. the most sustainable villages for growth.

- 2.8 Much Hadham achieved the fourth-strongest score in the study and is therefore one of the Group 1 villages.

Housing numbers to be delivered via the Neighbourhood Plan

- 2.9 Policy DPS3 (Housing Supply) of the District Plan sets an overall housing target of a minimum of **500** new homes to be delivered collectively between all eight of the Group 1 villages.
- 2.10 Much Hadham's share of this target is **54** dwellings between 2017-2033.
- 2.11 The supporting text of Policy VILL1 (Group 1 Villages) is clear that this quantum represents "*the minimum number of homes*" that Much Hadham will need to accommodate, and that "*development in excess of the minimum number indicated may be considered appropriate, depending on site availability, site suitability and upon the capacity of infrastructure to meet the additional demand that arises*".
- 2.12 The importance of delivering this growth through a Neighbourhood Plan is emphasised in the District Plan. Paragraph IV of Policy VILL1 says that "*Parish Councils are encouraged to prepare Neighbourhood Plans to allocate land for development*", whilst paragraph V of Policy VILL1 goes on to say that "*where Parish Councils have not submitted a Draft Neighbourhood Plan (Regulation 16) by 31st March 2021, the District Council will consider whether it is necessary to identify sites for development*". In this context, delivery of housing is a key goal for the Neighbourhood Plan.

Vision and objectives of the Neighbourhood Plan

- 2.13 As part of the development of the MHNP, the community of Much Hadham have set out the following vision for the parish:

"Much Hadham parish will remain an attractive locality with beautiful surrounding countryside, and will preserve its distinctive rural character, scale and atmosphere".

- 2.14 To deliver the Vision, a set of objectives form the basis of the policies contained in the MHNP. The survey and consultation process described above to prepare the Vision was also used to derive these objectives, presented as follows in the MHNP:

- Protect the pleasing character of the built environment and rural landscape setting.
- Help maintain a strong community spirit by supporting sustainable development close to the centre of the village.
- Ensure that new building minimises damage to rural views and historic building views
- Ensure that new building meets high sustainability standards.
- Ensure that new building has generous provision for on-site parking and, as far as possible, encourages walking and cycling to the main village facilities.
- Meet agreed housing targets and needs with a housing mix that is predominantly 1-, 2- and 3- bedroom homes; encourage affordability via good building design and practices.
- Ensure that new building does not add to the flood risk of the locality, nor does it infringe upon the flood plain.
- Encourage and enable existing and prospective leisure facilities and business ventures which are appropriate in the village and its rural context.
- Ensure footpaths, cycle routes and bridleways are protected, interconnected and extended where possible.
- Preserve and enhance woodlands, green spaces and green corridors, and the River Ash. Protect and promote biodiversity when considering new development, and
- Support creation of an integrated health centre should the opportunity arise.

3. What is the scope of the SEA?

Introduction

- 3.1 The aim here is to introduce the reader to the scope of the SEA, i.e. the sustainability issues/objectives that should be a focus of (and provide a methodological framework for) SEA. The purpose of scoping was to outline the 'scope' of the SEA through setting out:
- A context review of the key environmental and sustainability objectives of national, regional and local plans and strategies relevant to the Neighbourhood Plan;
 - Baseline data against which the Neighbourhood Plan can be assessed;
 - The key sustainability issues for the Neighbourhood Plan; and
 - An 'SEA Framework' of objectives against which the Neighbourhood Plan can be assessed.
- 3.2 Further information on the scope of the SEA is presented in **Appendix II**.

Consultation

- 3.3 The SEA Regulations require that *"when deciding on the scope and level of detail of the information that must be included in the report, the responsible authority shall consult the consultation bodies"*. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.¹⁴ As such, the Scoping Report was released to these authorities for consultation between the period of 31/03/2020 to 05/05/2020.
- 3.4 Comments received on the Scoping Report, and how they have been considered and addressed, are presented in **Appendix II**.

The SEA framework

- 3.5 The issues identified through the Scoping process were then translated into an 'SEA Framework'. This SEA Framework provides a methodological framework for the appraisal of likely significant effects on the baseline. The SEA framework is summarised in Table 3.2 below and presented in full in Appendix II.

Table 3.2 The SEA Framework

SEA theme	SEA objective
Biodiversity	Protect and enhance all biodiversity and geodiversity.
Climate change (mitigation and adaptation)	Continue to decrease GHG emissions and increase the resilience of the Neighbourhood Plan area to the effects of climate change.
Landscape	Protect and enhance the character and quality of landscapes
Historic environment	Protect, conserve and enhance the historic environment within the Neighbourhood Plan area.
Land, soil and water resources	Ensure the efficient and effective use of land, protect soil quality and avoid the loss of high-quality agricultural land.
	Use and manage water resources in a sustainable manner.

¹⁴ In line with Article 6(3) of the SEA Directive, these consultation bodies were selected *"by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes"*.

Population and community	Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.
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	Reduce deprivation and promote an inclusive and self-contained community, maximising access to local, high-quality community services and facilities.
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Health and wellbeing	Improve the health and wellbeing of residents within the Neighbourhood Plan area.
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Transportation	Promote sustainable transport use and reduce the need to travel.
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Part 1: What has plan-making/ SEA involved up to this point?

4. Introduction (to Part 1)

- 4.1 The 'narrative' of plan-making/ SEA up to this point is told within this part of the Environmental Report.
- 4.2 A key element of the SEA process is the appraisal of 'reasonable alternatives' for the MHNP. The SEA Regulations are not prescriptive as to what constitutes a reasonable alternative, stating only that the Environmental Report should present an appraisal of the 'plan and reasonable alternatives taking into account the objectives and geographical scope of the plan'.
- 4.3 In accordance with the SEA Regulations the Environmental Report must include:
- An outline of the reasons for selecting the alternatives dealt with; and
 - The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.
- 4.4 The following sections therefore describe how the SEA process to date has informed the preferred development strategy for the Neighbourhood Plan area and potential locations for development. Specifically, this chapter explains how the MHNP's development strategy has been shaped through considering alternative approaches for the location of housing in the Neighbourhood Plan area.

Structure of this part of the report

- 4.5 This part of the report is structured as follows:
- **Chapter 5** – explains the process of **establishing** reasonable alternatives
 - **Chapter 6** – presents the outcomes of **assessing** reasonable alternatives
 - **Chapter 7** – explains reasons for establishing the **preferred option**, in light of the assessment.

5. Establishing the reasonable alternatives

Introduction

- 5.1 Plan-making has been underway since Much Hadham was declared a Neighbourhood Area by East Herts District Council (EHDC) in September 2015.
- 5.2 Subsequently, the Parish Council has made significant progress on the preparation of both the Neighbourhood Plan and the evidence base which underpins it, culminating in a draft of the plan undergoing Regulation 14 (pre-submission) consultation between August and September 2019. Full details of the consultation undertaken to date can be found in the Consultation Statement that accompanies the Neighbourhood Plan.
- 5.3 This SEA environmental report accompanies the submission version of the Neighbourhood Plan. The findings of the SEA have informed and influenced the development of the submission version of the Neighbourhood Plan.
- 5.4 The minimum level of growth to be delivered through the Neighbourhood Plan is therefore established, meaning that the focus of the 'reasonable alternatives' is on the different potential locations at which to deliver this growth.

Housing numbers to be delivered through the Neighbourhood Plan

- 5.5 As identified in Chapter 2, Much Hadham is identified by Policy DPS3 of the East Herts District Plan as one of eight 'Group 1' villages in the District. The Group 1 villages are considered to be the most sustainable villages for growth based on their available services and facilities. Collectively, the eight Group 1 villages must deliver at least **500** dwellings over the plan period to 2033.
- 5.6 The District Plan identifies that Much Hadham must deliver **at least 54** of this total between 2017 and 2033, though does not make any site allocations in the parish at which to direct this growth. The District Plan therefore states that delivery of this housing target will be achieved via the preparation of a Neighbourhood Plan.
- 5.7 Since the base date of 2017 there have been a total of 19 completions and a further four commitments in Much Hadham, leaving a **residual need of 31** to be met through allocations in the plan.

Site options

- 5.8 In this context, the Parish Council has sought to identify site options to test for potential allocation through the Neighbourhood Plan.
- 5.9 Site options have been identified from two sources. Firstly, the 2017 East Herts Strategic Land Availability Assessment (SLAA) was reviewed for sites within the parish identified by EHDC. Secondly, a call for sites exercise was undertaken by the Parish Council in order to ensure that as broad a search as possible has been undertaken.
- 5.10 In total, this process yielded an **initial longlist of 18 potential site options**. These sites are discussed further below.

EHDC SLAA sites

- 5.11 Ten sites in Much Hadham are identified in the 2017 EHDC SLAA. These are:
 - Site 33/001: Allotments (Land to west of Hodge's Garage)

- Site 33/002: Land at Walnut Close
- Site 33/004: Land South of Ashleys
- Site 33/005: Dolan's Field (New Barn Lane)
- Site 33/012: Land at Barn Cottage
- Site 33/013: North Leys (East)
- Site 33/014: North Leys (West)
- Site 33/015: Wheatcroft (Kettle Green Lane)
- Site 33/015a: Land behind Windmill Way
- Site 33/016: Station Yard (NW extension)

MHNP call for sites

5.12 The Neighbourhood Plan call for sites process commenced in 2015 and has identified a further eight site options. These are:

- Priest's House
- Land at Hopley's
- Land at the former Barn School
- The Bull Inn
- Moor Place Gate
- Moor Place Gate (south side of the driveway only)
- South Plot, Culver
- Land north of Kettle Green Lane

Refining a shortlist of site options

5.13 A systematic sifting exercise was undertaken by the Parish Council to refine this longlist of 18 sites down to a shortlist of sites for more detailed further testing. Sites were sifted out of consideration if one or more of the following criteria applied:

- d) Site availability cannot be demonstrated, i.e. there is no recent evidence of landowner support for development;
- e) The site is neither within nor adjacent to the defined settlement boundary; and
- f) New development at the site has already commenced or been completed.

5.14 This process **sifted out a total of nine sites**. A summary of the number of sites sifted out in relation to each criteria is provide in Table 5.1 below.

Table 5.1 Summary of sites sifted out of the original longlist

Criteria	Number of sites sifted out	Site refs
a) Unavailable	1	33/001;
b) Outside boundary	5	33/004; 33/005; 33/012; 33/013; 33/014; 33/015.
c) Commenced	2	33/002; 33/016;

5.15 Consequently, a **shortlist of nine site options** progressed to more detailed further testing through the Parish Council's site assessment exercise, summarised below.

Summary of the Parish Council's site assessment

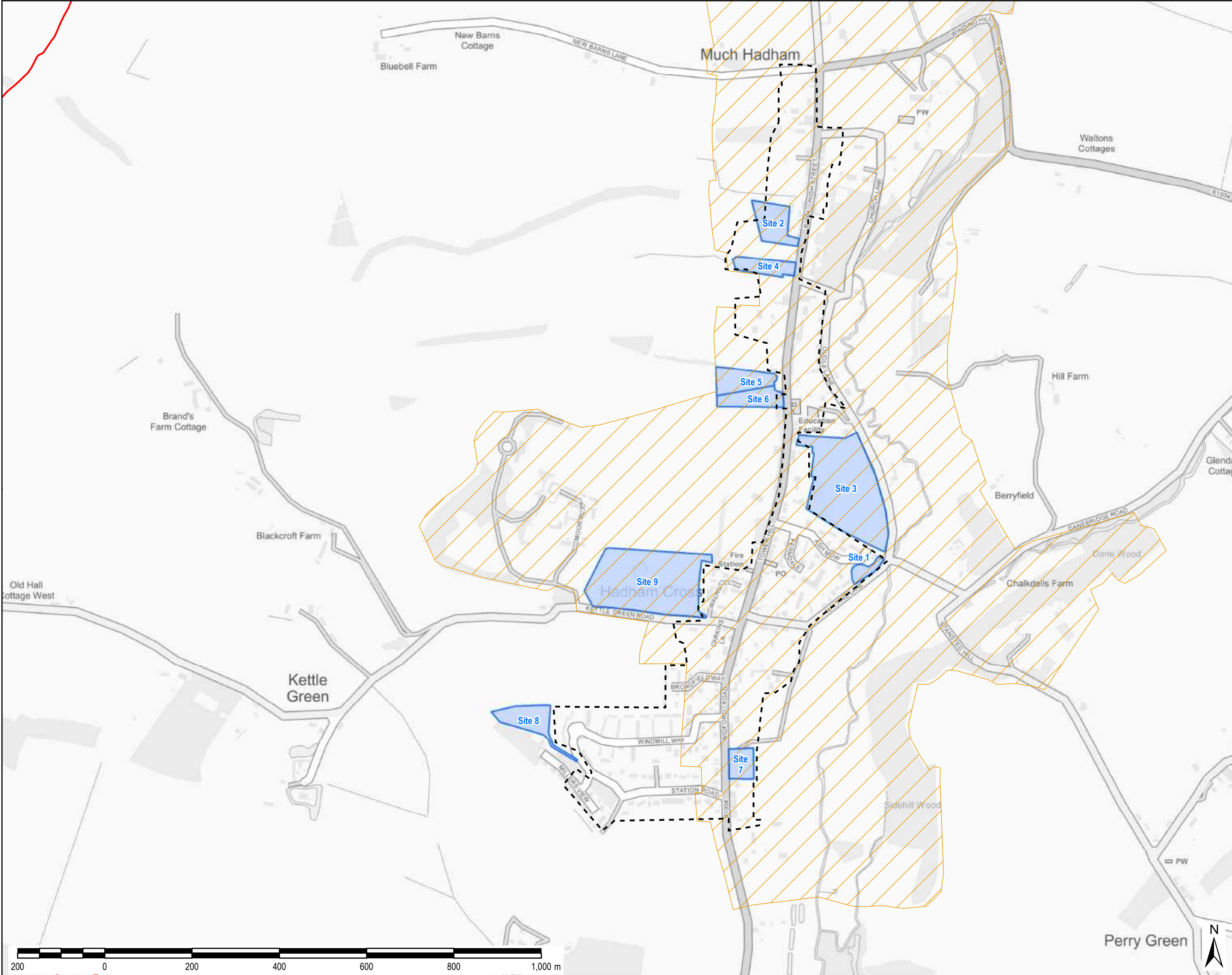
5.16 The Parish Council undertook a comprehensive site assessment exercise to help determine which sites should be considered further for allocation.

5.17 As outlined above, a total of **nine** of the nominated sites passed the initial sift and warranted further detailed testing. These are listed in Table 5.1 below and mapped in Figure 5.1 overleaf.

Table 5.2 Site options identified for testing through the Parish Council's site assessment

Site name	Source	Site area (ha)	Max potential yield ¹⁵
Priest's House	Call for sites	0.26	12
Land at Hopley's	Call for sites	0.74	6
Land at the former Barn School	Call for sites	3.38	30
The Bull Inn	Call for sites	0.37	10
Moor Place Gate (both sides)	Call for sites	1.13	20
Moor Place Gate (south side)	Call for sites	0.56	10
South Plot, Culver	Call for sites	0.66	4
Land north of Kettle Green Lane	Call for sites	3.75	20
Land behind Windmill Way (SLAA ref 33/015a)	EHDC SLAA	0.57	14

¹⁵ The area and maximum potential yield for each site are taken from the Parish Council's Site Assessment Results Summary with the exception of the Allotments and Land Behind Windmill Way which are taken from the EHDC SLAA.



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LEGEND

- Much Hadham Neighbourhood Plan Area
- Village Development Boundary
- Conservation Area
- Shortlist Site

Site 1 - Priest House
Site 2 - Land at Hopleys
Site 3 - Land at former Barn School
Site 4 - The Bull Inn
Site 5 - Moor Place Gate (whole site)
Site 6 - Moor Place Gate (south side)
Site 7 - South Plot, Culver
Site 8 - Land behind Windmill Way
Site 9 - Land north of Kettle Green Lane

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Purpose of Issue
FINAL

Client
MUCH HADHAM PARISH COUNCIL

Project Title
SEA FOR THE MUCH HADHAM NEIGHBOURHOOD PLAN

Drawing Title
SHORTLIST OF SITES AT MUCH HADHAM FOR TESTING THROUGH THE SEA

Drawn CN	Checked JW	Approved CM	Date 07/07/2020
AECOM Internal Project No. 60571087		Scale @ A3 1:8,000	

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Methodology

- 5.18 After the longlist of sites had undergone the initial sift as outlined above, the remaining ten sites were tested against 14 detailed assessment criteria to assign an overall rank based on their suitability, availability and achievability/viability.
- 5.19 Each site was assigned a score out of 4 in relation to each criterion, with 4 being the strongest score and 0 being the weakest. A maximum possible score of 56 was achievable.

Results summary

- 5.20 The Parish Council's site assessment ranked the sites in the following order of suitability.

Site name	Score (maximum of 56)	Rank
Priest's House	45	=1
Land at Hopley's	45	=1
Land at the former Barn School	44	=2
Moor Place Gate (south side)	44	=2
The Bull Inn	43	=3
South Plot, Culver	43	=3
Moor Place Gate	42	7
Land behind Windmill Way	31	8
Land north of Kettle Green Lane	26	9

Additional technical evidence

- 5.21 The pre-submission (Regulation 14) draft of the Neighbourhood Plan proposed allocation of Moor Place Gate (south side) and South Plot, Culver.
- 5.22 At Regulation 14 consultation, Historic England identified that they would likely object to the plan if it were to propose allocation of either site at Moor Place Gate, i.e. either the whole site or just the south side of the site. This position was based on what HE viewed as unacceptable harm which would result from development at such a sensitive location.
- 5.23 Separately, extant planning permission at the site at South Plot, Culver has been implemented since the pre-submission draft of the Neighbourhood Plan was prepared.
- 5.24 Taking the above into account, it is considered that neither Moor Plate Gate, Moor Place Gate (south side) or South Plot, Culver can be considered further for allocation.

Testing sites against the SEA framework

- 5.25 In order to determine which combination – or ‘package’ – of sites, should be tested as reasonable alternatives, it is first necessary to test a shortlist of individual sites in relation to the SEA framework in isolation.
- 5.26 The SEA site assessment tests every site in relation to each of the SEA themes (e.g. biodiversity, climate change etc). **It is important to note that the SEA themes are not assumed to be of equal weight.** Therefore, evaluating the overall performance of each site is more nuanced than simply reconciling the overall number of positive scores against the overall of negative scores. Judgement must be applied as to which of the themes attract the greatest weight in the context of each site.
- 5.27 Based on the results of the Parish Council’s site assessment exercise, and subsequent technical evidence, a final shortlist of **six** sites were identified for consideration through the SEA process as potential ‘reasonable alternative’ sites for allocation.
- 5.28 These are:
- Priest House;
 - Land at Hopley’s;
 - Land at the former Barn School;
 - The Bull Inn;
 - Land behind Windmill Way; and
 - Land north of Kettle Green Lane.
- 5.29 The assessments are presented below:

Table 5.3 Priest's House

SEA theme	Commentary						
Biodiversity	There are no internationally, nationally or locally designated sites of biodiversity significance in proximity to the Priest's House site. The site is partly bounded by established trees and hedgerow which could have some potential to serve as wildlife habitats. Additionally, the River Ash flows past the eastern boundary of the site and could have potential to function as a habitat corridor. However, these features could all be retained through the development process and significant adverse effects are considered unlikely and neutral effects are anticipated.						
Climate Change	<p>In terms of climate change mitigation, the site's location suggests it could help minimise additional greenhouse gas emissions from the plan area by virtue of supporting pedestrian access to the key village services (i.e. the village shop, primary school, church, pub, park and village hall) along car free footpaths. However, it is recognised that Much Hadham's rural location means all sites in the village will likely have a high degree of car dependency in terms of accessing a wider range of services outside the village. The site is unlikely to have potential to deliver a scale of development which could measurably impact emissions from the built environment.</p> <p>In terms of climate change adaptation, the site is mostly free of fluvial and surface water flood risk, though a small peripheral area of flood zone 2 is evidence at the north of the site. However, it is likely that development on site could be directed away from areas at greatest risk of increased flooding associated with a changing climate. Neutral effects are anticipated overall in relation to climate change.</p>						
Landscape	The site is at the eastern edge of the village and faces out onto attractive countryside across the River Ash towards Stansted Hill. It is noted that there is a tree protection order (TPO) at the northern extent of the site, part of TPO no. 209-A1. Despite this rural fringe location, it is considered that the site has relatively low sensitivity within the landscape due to thick perimeter screening provided by established planting which substantially limits direct views out of the site to the east, or direct views in. The character of the site is therefore considered to be under stronger influence from the 20 th century residential development at Ash Meadow. Effects in relation to the landscape SEA objectives are considered likely to be neutral.						
Historic Environment	<table><tr><th>Heritage assets affected</th><th>What contribution does the site make to the significance of the heritage asset(s)?</th><th>Assess the potential impact of development on significance</th></tr><tr><td>Much Hadham Conservation Area</td><td>The site makes no significant contribution to the conservation area. Ash Meadow is a late 20th century development of no notable historic character and views into the site from the fields to the east (which are also within the conservation area) are well screened.</td><td>Development at the site would be unlikely to have a discernible effect on the significance of the conservation area.</td></tr></table>	Heritage assets affected	What contribution does the site make to the significance of the heritage asset(s)?	Assess the potential impact of development on significance	Much Hadham Conservation Area	The site makes no significant contribution to the conservation area. Ash Meadow is a late 20 th century development of no notable historic character and views into the site from the fields to the east (which are also within the conservation area) are well screened.	Development at the site would be unlikely to have a discernible effect on the significance of the conservation area.
Heritage assets affected	What contribution does the site make to the significance of the heritage asset(s)?	Assess the potential impact of development on significance					
Much Hadham Conservation Area	The site makes no significant contribution to the conservation area. Ash Meadow is a late 20 th century development of no notable historic character and views into the site from the fields to the east (which are also within the conservation area) are well screened.	Development at the site would be unlikely to have a discernible effect on the significance of the conservation area.					
Land, Soil and Water Resources	New development at the site would not result in the loss of productive agricultural land and would ensure that growth is delivered within the existing built area of the village. However, positive effects cannot be concluded on the basis that development at the site would predominantly use residential greenfield land and so cannot be considered to make the best use of available land. Neutral effects are concluded overall.						
Population and Community	Allocation of the site would contribute positively towards meeting local housing needs, including potential delivery of affordable housing of mixed type and tenure. The delivery of new housing is also likely to contribute to the continued vitality of Much Hadham through supporting local services and facilities. Positive effects are anticipated in relation to the population and community SEA objectives.						
Health and Wellbeing	<p>The site could support walking and cycling as viable options for meeting a range of day-to-day need within village, encouraging healthy transport choices. This includes access to the Much Hadham Health Centre which is within reasonable walking distance.</p> <p>The site is well located to enable outdoor recreation via access to the extensive Public Rights of Way (PRoW) network around the village. Access to outdoor recreation opportunities can help support positive health and wellbeing outcomes. Positive effects are anticipated in relation to the health and wellbeing SEA objectives.</p>						

SEA theme	Commentary		
Transportation	The site has some potential to support walking and cycling to the range of services available in the village. However, the village is too far from higher-tier services for walking and cycling to be viable options to meet the majority of needs. Bus provision to the village is infrequent and car dependency is high. Therefore, whilst the site performs well in the context of the Neighbourhood Plan area, in absolute terms it will not deliver development which promotes sustainable transport use for many needs.		
Key			
Likely adverse effect (without mitigation measures)		Likely positive effect	
Neutral/no effect		Uncertain effects	

Table 5.4 Land at Hopley's

SEA theme	Commentary		
Biodiversity	There are no internationally, nationally or locally designated sites of biodiversity significance in proximity to Hopley's. The site is partly bounded by established trees and hedgerow which could have some potential to serve as wildlife habitats, though these could likely be retained through the development process. Much of the site is already covered by hard surfacing or by existing structures and redevelopment could potentially offer the opportunity to add additional green infrastructure on site, giving rise to the potential for positive effects are considered likely in relation to biodiversity.		
Climate Change	<p>In terms of climate change mitigation, the site's location suggests it could help minimise additional greenhouse gas emissions from the plan area by virtue of supporting pedestrian access to the key village services (i.e. the village shop, primary school, church, pub, park and village hall) along car free footpaths. However, it is recognised that Much Hadham's rural location means all sites in the village will likely have a high degree of car dependency in terms of accessing a wider range of services outside the village. The site is unlikely to have potential to deliver a scale of development which could measurably impact emissions from the built environment.</p> <p>In terms of climate change adaptation, the site is entirely free of fluvial and surface water flood risk. Development on site would therefore be directed away from areas at greatest risk of increased flooding associated with a changing climate. Neutral effects are anticipated overall in relation to climate change.</p>		
Landscape	The site is in the village centre though is screened from the historic High Street by existing dwellings. Whilst the historic setting gives the site some sensitivity in relation to Much Hadham's characterful villagescape, much of the site is previously developed and therefore already part of the village's built area. Re-development of the existing nursery/garden centre on site could therefore have potential for minimal impact on the villagescape character of Much Hadham on the basis that it is both well screened and is previously developed. Perimeter screening to the west of the site helps obscure views in from the wider countryside beyond, limiting sensitivity within the landscape. Neutral effects are anticipated in relation to the SEA landscape objectives overall.		
Historic Environment	Heritage assets affected 1 x Grade I-listed building (Much Hadham Hall)	What contribution does the site make to the significance of the heritage asset(s)? The site's entrance is directly opposite to the main gated entrance to the grounds of Much Hadham Hall. Although the majority of the site itself is screened from Much Hadham Hall by existing development on the High Street, its entrance is considered to form part of the immediate setting of the Hall and therefore make a substantial contribution to its significance.	Assess the potential impact of development on significance There could be potential for development to alter the character of the site entrance and by extension the significance of the entrance to Much Hadham Hall. However, it is noted that development on site would not be directly visible from Much Hadham Hall and that it could be feasible to retain the character of the site entrance through the development process. As such, effects could be largely determined by the design, landscaping and layout of a future scheme and

SEA theme	Commentary	
		are considered uncertain at this stage.
1 x Grade II*-listed building (The Red House)	The site itself makes only a limited direct contribution to the significance of the Red House, though the site entrance is immediately adjacent to the listed building and therefore makes a significant contribution to its character and setting.	Development on site would be screened from the Red House itself, though any alteration to the character of the site entrance could have potential for adverse effects on the significance of the Red House and the way in which it is perceived in the historic street scene.
3 x Grade II-listed buildings (54 High Street; 50 and 52 High Street; Hare and Son Solicitors).	There are direct sightlines into the site from all three Grade II-listed buildings and the settings of each are considered to extend over the site to some extent.	Development could have potential to adversely affect the significance of the listed buildings and their settings by increasing the massing of built form to the west of the buildings, increasing the sense of enclosure of the buildings' gardens. This could be mitigated through sensitive design and layout.
Much Hadham Conservation Area	The site makes only a limited contribution to the collective significance of the conservation area as a whole, though its openness makes a limited contribution to the setting of the conservation area.	Development of the site would focus growth at previously developed land, potentially helping avoid or minimise adverse effects on the significance of the conservation area as a whole.
Hopley's Garden Locally Important Historic Park and Garden	The HPG is a District Plan-scale designation and has no statutory recognition by Historic England. Nevertheless, the site makes an important contribution to the HPG's significance, particularly as it is located between the High Street and the actual gardens themselves, giving it a degree of prominence within the HPG.	Development would be focused on the previously developed part of the site and could be designed and laid out in a manner which avoids intrusion into the HPG and its significance.
Land, Soil and Water Resources	Much of the site is previously developed and redevelopment would represent good use of available land in terms of directing growth away from land in agricultural use. On the basis that development at Hopley's would minimise greenfield land-take whilst intensifying development in the village's existing built area it is considered to contribute positively to the SEA land, soil and water resources objectives.	

SEA theme	Commentary	
Population and Community	Allocation of the site would contribute positively towards meeting local housing needs, including potential delivery of affordable housing of mixed type and tenure. The delivery of new housing is also likely to contribute to the continued vitality of Much Hadham through supporting local services and facilities. Positive effects are anticipated in relation to the population and community SEA objectives.	
Health and Wellbeing	<p>The site could support walking and cycling as viable options for meeting a range of day-to-day need within village, encouraging healthy transport choices. This includes access to the Much Hadham Health Centre which is within reasonable walking distance.</p> <p>The site is well located to enable outdoor recreation via access to the extensive Public Rights of Way (PRoW) network around the village. Access to outdoor recreation opportunities can help support positive health and wellbeing outcomes. Positive effects are anticipated in relation to the health and wellbeing SEA objectives.</p>	
Transportation	The site has some potential to support walking and cycling to the range of services available in the village. However, the village is too far from higher-tier services for walking and cycling to be viable options to meet the majority of needs. Bus provision to the village is infrequent and car dependency is high. Therefore, whilst the site performs well in the context of the Neighbourhood Plan area, in absolute terms it will not deliver development which promotes sustainable transport use for many needs.	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Table 5.5 Land at the former Barn School

SEA theme	Commentary		
Biodiversity	There are no internationally, nationally or locally designated sites of biodiversity significance in proximity to the site. The site is partly bounded by established trees and hedgerow which could have some potential to serve as wildlife habitats. Boundary planting could be retained through the development process and there could be potential to retain significant trees by incorporating them into the layout of any future scheme. Neutral effects are anticipated in relation to biodiversity.		
Climate Change	<p>In terms of climate change mitigation, the site's location suggests it could help minimise additional greenhouse gas emissions from the plan area by virtue of supporting pedestrian access to the key village services (i.e. the village shop, primary school, church, pub, park and village hall) along car free footpaths. However, it is recognised that Much Hadham's rural location means all sites in the village will likely have a high degree of car dependency in terms of accessing a wider range of services outside the village. The site is unlikely to have potential to deliver a scale of development which could measurably impact emissions from the built environment.</p> <p>In terms of climate change adaptation, the site is mostly free of fluvial and surface water flood risk, though a small localised area of fluvial flood zone 2 is evident at the far south east of the site. In practice, however, development on site could be directed away from areas at greatest risk of increased flooding associated with a changing climate. Neutral effects are anticipated overall in relation to climate change.</p>		
Landscape	<p>The site appears to have potential for a high degree of sensitivity within the landscape, as its openness and central location provide a characterful backdrop to existing development along Tower Hill and helps frame views into the village from Oudle Lane and the open countryside to the east.</p> <p>Development could have potential to urbanise the site, or part of it, and in doing so partially erode the site's contribution to the village's landscape setting.</p>		
Historic Environment	Heritage assets affected	What contribution does the site make to the significance of the heritage asset(s)?	Assess the potential impact of development on significance
	Much Hadham Conservation Area	The site's openness is a notable feature of the village and, by extension, the conservation area. Whilst sightlines into and out of the site are only intermittent due to the positioning of existing buildings and perimeter screening, the undeveloped character of the site forms a backdrop to a large number of properties within the conservation area and is considered to contribute to the significance of the conservation area as whole as result.	The scale of development at the site would be a key determinant in the potential impact on the significance of the conservation area. As such, effects are considered uncertain at this stage. If all growth was delivered at the site in isolation, then the impact could potentially be adverse. If only a small quantum of development was delivered in a small part of the site its impact could be minimal.
	3 x Grade II-listed buildings (St Andrew's Church of England JMI School; Almshouses; The Barn School).	The site provides an open and rural backdrop to the listed buildings, making a substantial contribution to the significance of their respective settings.	As above, if the quantum of development on site was substantial then there could be potential for adverse effects on the setting of the three identified listed buildings. However, the

SEA theme	Commentary	
		<p>site is large and if development was directed to parts of the site beyond the setting of the listed buildings then its effect would likely not be harmful. Therefore, the precise nature of effects will be determined by the scale of any future scheme and are uncertain at this stage, though it is appropriate to flag the potential for negative effects given the underlying sensitivity of the site.</p>
Land, Soil and Water Resources	<p>The site appears to be largely in productive agricultural use and is underlain by either Grade 2 or Grade 3 quality land. This gives it potential to be 'best and most versatile' (BMV) land. The NPPF establishes a presumption against the unnecessary loss of BMV land where areas of poorer quality land are available and it is therefore considered that development of the site would result in negative effects in relation to the SEA land, soil and water resources objectives.</p>	
Population and Community	<p>Allocation of the site would contribute positively towards meeting local housing needs, including potential delivery of affordable housing of mixed type and tenure. The delivery of new housing is also likely to contribute to the continued vitality of Much Hadham through supporting local services and facilities. Positive effects are anticipated in relation to the population and community SEA objectives.</p>	
Health and Wellbeing	<p>The site could support walking and cycling as viable options for meeting a range of day-to-day need within village, encouraging healthy transport choices. This includes access to the Much Hadham Health Centre which is within reasonable walking distance. The site is well located to enable outdoor recreation via access to the extensive Public Rights of Way (PRoW) network around the village. Access to outdoor recreation opportunities can help support positive health and wellbeing outcomes. Positive effects are anticipated in relation to the health and wellbeing SEA objectives.</p>	
Transportation	<p>The site has some potential to support walking and cycling to the range of services available in the village. However, the village is too far from higher-tier services for walking and cycling to be viable options to meet the majority of needs. Bus provision to the village is infrequent and car dependency is high. Therefore, whilst the site performs well in the context of the Neighbourhood Plan area, in absolute terms it will not deliver development which promotes sustainable transport use for many needs.</p>	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Table 5.6 The Bull Inn

SEA theme	Commentary		
Biodiversity	There are no internationally, nationally or locally designated sites of biodiversity significance in proximity to the Bull Inn. The site is partly bounded by established trees and hedgerow which could have some potential to serve as wildlife habitats, though there are no identified priority habitats within or adjacent to the site. Boundary planting could be retained through the development process and there could be potential to retain significant trees by incorporating them into the layout of any future scheme. Neutral effects are anticipated in relation to biodiversity.		
Climate Change	<p>In terms of climate change mitigation, the site's location suggests it could help minimise additional greenhouse gas emissions from the plan area by virtue of supporting pedestrian access to the key village services (i.e. the village shop, primary school, church, pub, park and village hall) along car free footpaths. However, it is recognised that Much Hadham's rural location means all sites in the village will likely have a high degree of car dependency in terms of accessing a wider range of services outside the village. The site is unlikely to have potential to deliver a scale of development which could measurably impact emissions from the built environment.</p> <p>In terms of climate change adaptation, the site is free of fluvial flood risk though does fall partially within an area of high surface water flood risk along its southern and western boundaries. This could potentially be mitigated through the design and layout of a future scheme so that areas of high risk are kept open and undeveloped. Neutral effects are anticipated overall.</p>		
Landscape	The site is central within the village core and backs on to open fields beyond its western boundary. Despite this, the site appears to have relatively low visual sensitivity within the landscape and villagescape as it is well screened by both perimeter planting and by the placement of existing buildings along the High Street, including the Bull Inn. However, development along the High Street still strongly conforms to the traditional linear settlement pattern of the village and in the area nearest the site rarely has a depth greater than one or two dwellings. Consequently, the site has some sensitivity in villagescape character terms as its size and form – i.e. running perpendicular to the High Street – could deliver new housing which is inconsistent with the characterful settlement pattern. Given the historic significance of the linear pattern of the High Street it is considered that development could result in adverse effects by adding uncharacteristic depth to an area of the village particularly sensitive to change.		
Historic Environment	Heritage assets affected	What contribution does the site make to the significance of the heritage asset(s)?	Assess the potential impact of development on significance
	Grade I-listed Much Hadham Hall and its setting.	The site is within around 50m of Much Hadham Hall, though direct sightlines between the site and the Hall are obstructed by a combination of the Hall's perimeter wall, mature trees within the grounds of the Hall and by the position of buildings on the western side of the High Street. As such, the site makes only a limited direct contribution to the significance of the listed building, though given the significance of a Grade I building is substantial it must be assumed that the site's openness makes an indirect contribution to the Hall's significance by helping preserve the historic character of its wider setting.	Development could have some limited potential for adverse effects on the significance of Much Hadham Hall and its setting, though sensitive design and layout should help ensure mitigation.

SEA theme	Commentary
	<p>3 x Grade II*-listed buildings adjacent to the site (The Red House; The White House; Stable Block at Much Hadham Hall).</p> <p>The site makes little direct contribution to the significance of the Stable Block as its setting is largely severed by the perimeter wall of Much Hadham Hall which obscures views of the listed building from the High Street. Similarly, the White House and its setting have limited inter-visibility with the site as a result of the position of adjacent buildings. However, the grounds of the Red House could have direct sightlines into the site.</p> <p>There could be potential for development to affect the significance of the setting of the Red House by enclosing or overlooking the building and its gardens.</p>
	<p>2 x Grade II-listed buildings on or adjacent to the site (The Bull Inn; Vine Cottage)</p> <p>There are direct sightlines into the site from both Grade II-listed buildings and the settings of each are considered to extend over the site to some extent. However, the Bull Inn itself, by virtue of its location within the site boundaries, is likely to be particularly sensitive to effects from new development.</p> <p>There could be potential for significant negative effects on the Bull Inn and its setting. The openness of the site and its function and gardens for the pub makes a substantial contribution to the significance of the building and how it is perceived within its historic setting. There could be some potential to mitigate this harm through very sensitive design, materials, massing, layout and landscaping.</p>
	<p>Much Hadham Conservation Area</p> <p>Much Hadham Conservation Area covers a large proportion of the village and individual sites are unlikely to make a major contribution to the significance of the conservation area as a whole. However, the site's openness helps preserve the historic settlement pattern and layout of the High Street as well as the significance of a number of individual historic buildings within it and is considered to have an important role to play in preserving the character and significance of the conservation area in this context.</p> <p>Development could have potential to alter the historic pattern of development within the conservation area. It is considered this would have potential to give rise to adverse effects on the significance of the conservation area.</p>
Land, Soil and Water Resources	<p>Aside from the Bull Inn itself, the majority of the site is not developed. However, by virtue of the site's current function as the garden and extended curtilage of the Bull Inn, new development would not result in the loss of productive agricultural land and would ensure that growth is delivered within and adjacent to the existing built area of the village. However, positive effects cannot be concluded on the basis that development at the site would predominantly not use brownfield land and so cannot be considered to make the best use of available land. Neutral effects are concluded overall.</p>
Population and Community	<p>Allocation of the site would contribute positively towards meeting local housing needs, including potential delivery of affordable housing of mixed type and tenure. The delivery of new housing is also likely to contribute to the continued vitality of Much Hadham through supporting many local services and facilities. Although the Bull Inn itself falls within the boundaries of the site it is considered that development would not necessitate the closure or change of use of the pub. Therefore, recognising the potential to deliver new housing</p>

SEA theme	Commentary	
	without necessarily requiring the loss of a valued community asset, positive effects are anticipated in relation to the population and communities SEA objectives.	
Health and Wellbeing	The site could support walking and cycling as viable options for meeting a range of day-to-day need within village, encouraging healthy transport choices. This includes access to the Much Hadham Health Centre which is within reasonable walking distance. The site is well located to enable outdoor recreation via access to the extensive Public Rights of Way (PRoW) network around the village. Access to outdoor recreation opportunities can help support positive health and wellbeing outcomes. Positive effects are anticipated in relation to the health and wellbeing SEA objectives.	
Transportation	The site has some potential to support walking and cycling to the range of services available in the village. However, the village is too far from higher-tier services for walking and cycling to be viable options to meet the majority of needs. Bus provision to the village is infrequent and car dependency is high. Therefore, whilst the site performs well in the context of the Neighbourhood Plan area, in absolute terms it will not deliver development which promotes sustainable transport use for many needs.	
Key		
Likely adverse effect (without mitigation measures)	Likely positive effect	
Neutral/no effect	Uncertain effects	

Table 5.7 Land behind Windmill Way

SEA theme	Commentary	
Biodiversity	There are no internationally, nationally or locally designated sites of biodiversity significance in proximity to Land behind Windmill Way. An area of deciduous woodland priority habitat is adjacent to the site's southern boundary, though this would likely be retained through the development process. There could be potential opportunities to seek a biodiversity net gain through the development process by enhancing the connectivity between the site and the adjacent corridor of priority habitat. On balance, neutral effects are considered likely.	
Climate Change	In terms of climate change mitigation, the site's location suggests it could help minimise additional greenhouse gas emissions from the plan area by virtue of supporting pedestrian access to the key village services (i.e. the village shop, primary school, church, pub, park and village hall) along car free footpaths. However, it is recognised that Much Hadham's rural location means all sites in the village will likely have a high degree of car dependency in terms of accessing a wider range of services outside the village. The site is unlikely to have potential to deliver a scale of development which could measurably impact emissions from the built environment. In terms of climate change adaptation, the site is entirely free of both fluvial and surface water flood risk.	
Landscape	Development at the site could have potential to relate well to the existing built form of the village, presenting as a natural extension to established development Windmill Way and Millers View. Although the site's northern boundary is open and has views out over the open countryside beyond, views into the site are already framed by existing development and it is considered that new development at the site would be unlikely to give rise to adverse effects in relation to landscape. Neutral effects are therefore anticipated.	
Historic Environment	There are no designated or undesignated heritage assets within close proximity of the site, including the conservation area. The site is also considered to be beyond the immediate or extended setting of any heritage asset and does not appear to have sensitivity in relation to the historic environment. Neutral effects are anticipated from development at the site.	
Land, Soil and Water Resources	The site appears to be underlain by an area of Grade 2 agricultural land, making it 'best and most versatile' (BMV) land. Footnote 53 of the NPPF establishes a presumption against the unnecessary loss of BMV land where poorer quality land is available. Although the site does not appear to currently be in arable use it could have potential to return to productive use in future and development could therefore represent the loss of land with potential to be best and most versatile. Negative effects are therefore anticipated in relation to the land, soil and water resources SEA objectives.	
Population and Community	Allocation of the site would contribute positively towards meeting local housing needs, including potential delivery of affordable housing of mixed type and tenure. The delivery of new housing is also likely to contribute to the continued vitality of Much Hadham through supporting local services and facilities. Positive effects are anticipated in relation to the population and community SEA objectives.	
Health and Wellbeing	The site could support walking and cycling as viable options for meeting a range of day-to-day need within village, encouraging healthy transport choices. This includes access to the Much Hadham Health Centre which is within reasonable walking distance. The site is well located to enable outdoor recreation via access to the extensive Public Rights of Way (PRoW) network around the village. Access to outdoor recreation opportunities can help support positive health and wellbeing outcomes. Positive effects are anticipated in relation to the health and wellbeing SEA objectives.	
Transportation	Vehicular access to the site appears to be significantly constrained by virtue of its location at the end of a narrow access track. Although the track serves an existing property, it has no capacity for enhancement and appears notably unsuitable for serving a new development. The site's location gives it some potential to support walking and cycling to the range of services available in the village. However, the village is too far from higher-tier services for walking and cycling to be viable options to meet the majority of needs and car dependency is likely to meet a wider range of needs.	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Table 5.8 Land north of Kettle Green Lane

SEA theme	Commentary
Biodiversity	There are no internationally, nationally or locally designated sites of biodiversity significance in proximity to the site. It is noted that part of the site was proposed as a 'nature area' in 2012 via approved planning application 3/12/1075/FP ¹⁶ . However, this proposal has not subsequently been fully implemented and does not appear to reflect any underlying biodiversity sensitivity at the site. In terms of effects upon baseline biodiversity sensitivity it is therefore considered that development would not result in adverse effects and there could be potential to seek a net gain in biodiversity through the development process. The existing perimeter planting and on-site attenuation pond could be retained and incorporated into a future scheme. In light of the above, neutral effects are anticipated in relation to the SEA biodiversity objectives.
Climate Change	<p>In terms of climate change mitigation, the site's location suggests it could help minimise additional greenhouse gas emissions from the plan area by virtue of its close proximity to key village services (i.e. the village shop, primary school, church, pub, park and village hall). However, it is recognised that Much Hadham's rural location means all sites in the village will likely have a high degree of car dependency in terms of accessing a wider range of services outside the village. The site is unlikely to have potential to deliver a scale of development which could measurably impact emissions from the built environment.</p> <p>In terms of climate change adaptation, the site has a channel of surface water flood risk running through its centre in an east-west alignment. Although this includes ribbons of medium and high risk, the overall area of risk is narrow and could likely be mitigated through by being incorporated into open space in the layout of a future scheme. The site is free of fluvial flood risk. Natural effects are anticipated overall.</p>
Landscape	The site is open and undeveloped and supports views between the historic village core and Moor Place. This gives it prominence and sensitivity within the landscape, particularly in relation to maintaining the rural setting and character of the village as seen from the approach along Kettle Green Lane. Whilst there could be some potential to mitigate adverse effects through design, layout and landscaping of a future scheme, it is considered that development would inevitably urbanise the character of the area between Moor Place and the western edge of the village and that this would lead adverse effects in relation to the landscape SEA objectives.

¹⁶ "Renovation and extension of 4 existing dwellings, erection of 4 new dwellings, change of use, alterations and extensions to existing agricultural buildings to provide 7 dwellings, demolition of existing agricultural buildings, associated parking, landscaping and publicly accessible parkland with nature area", available via: <https://publicaccess.eastherts.gov.uk/online-applications/>

SEA theme	Commentary		
Historic Environment	Heritage assets affected	What contribution does the site make to the significance of the heritage asset(s)?	Assess the potential impact of development on significance
	Immediate setting of Grade II-listed Back Lodge, Yew Tree Cottage.	The site's openness makes a direct contribution to the rural setting and historic character of Back Lodge. The immediate setting of the listed building extends over the site and the site is therefore considered to make a moderate to substantial contribution to its significance by preserving its open outlook.	Development could have potential for adverse effects on significance by eroding the open and rural setting of Back Lodge.
	Wider setting of Grade I-listed Moor Place.	There are no direct sightlines between the site and Moor Place itself due to the positioning of intervening structures within the historic farmyard associated with Moor Place (as well as more modern residential development at the farmyard site). However, in correspondence with the Parish Council, Historic England has identified that the openness of the site is considered to significantly contribute to the wider rural setting of Moor Place and, by extension, to its historic character.	Development could have potential for adverse effects on significance by eroding the open and rural setting of Moor Place.
	Wider setting of the Grade II*-listed stable block and adjoining cottages at Moor Place	There are partial sightlines between some areas of the site and the listed building. As with Moor Place itself, Historic England has identified that the openness of the site is considered to significantly contribute to the wider rural setting of the listed building and, by extension, to its historic character.	Development could have potential for adverse effects on significance by eroding the open and rural setting of the stable block and its adjoining cottages.
	Much Hadham Conservation Area	The site is within the conservation area and forms an open and characterful landscape gap between the built area of the village and the historic Moor Place to the east. In this sense the site makes a substantial contribution to the significance of the conservation area by maintaining the rural and undeveloped setting of the overall Moor Place cluster, whilst also preserving the historic townscape character of the village core at Kettle Green Lane / Tower Hill.	There is potential for significant adverse effects in relation to the significance of the Much Hadham conservation area from development on site. The current openness of the site is an intrinsic part of the conservation area and development would erode this openness.
	Moor Place Locally Important Historic Park and Garden.	The HPG is a District Plan-scale designation and has no statutory recognition by Historic England. The site falls within the HPG and therefore makes a substantial contribution to the significance of the HPG overall.	Development of any scale could have potential to erode the openness of the HPG which is central to its significance.
Land, Soil and Water Resources	The site appears to be underlain by an area of Grade 2 agricultural land, making it 'best and most versatile' (BMV). Footnote 53 of the NPPF establishes a presumption against the unnecessary loss of BMV land where poorer quality land is available. Although the site has previously been proposed as a recreational nature area, the proposals have not been		

SEA theme	Commentary	
	fully implemented and the site has theoretical potential to be retained for productive agricultural use. In this context, development at the site is considered likely to result in negative effects in relation to the land, soil and water resources SEA objectives.	
Population and Community	The site is understood to have potential capacity for around 20 dwellings which could be a sufficient quantum of development to trigger on-site delivery of affordable housing and to achieve delivery of a range of types and tenures of housing. Additionally, the site is within a short distance of the range of community facilities in the village centre. Positive effects are anticipated in relation to the population and communities SEA objectives.	
Health and Wellbeing	<p>The site's location at the fringe of the village centre gives it good access to the network of rural public rights of way (PRoW) to the west of the village. Access to outdoor recreation opportunities can help support positive health and wellbeing outcomes.</p> <p>The site is within close proximity of the Much Hadham Health Centre but does not have safe car-free pedestrian access to it.</p> <p>Similarly, the absence of segregated footpaths to other village services means that development at the site may be unlikely to promote healthy transport choices for local journeys. Neutral effects are anticipated in relation to the health and wellbeing SEA objectives.</p>	
Transportation	<p>The site is close to the village centre, though there is no safe car-free pedestrian access to the range of services in the village and pedestrians from the site would need to walk along a narrow stretch of Kettle Green Lane with no pavement. The narrow width of Kettle Green Lane and placement of surrounding buildings means expanding the lane to introduce a pavement would not be achievable.</p> <p>In terms of meeting a broader range of needs, the village is too far from higher-tier services for walking and cycling to be viable options for accessing many higher tier services and facilities. Bus services to the village are infrequent and car dependency is high.</p> <p>Overall therefore, the site does not appear to have potential to deliver development which promotes sustainable transport use for many needs and negative effects are anticipated in relation to transportation as a result.</p>	
Key		
Likely adverse effect (without mitigation measures)		Likely positive effect
Neutral/no effect		Uncertain effects

Summary of SEA site assessment

5.30 A summary of the findings of the SEA assessment of potential site options is presented below:

Table 5.9 Summary of SEA site assessment findings

Site	Biodiversity	Climate change	Landscape	Historic Environment	Land, soil and water resources	Population and community	Health and wellbeing	Transport
Priest House								
Hopley's								
Barn School								
Bull Inn								
Windmill Way								
Land at KGL								
Key								
Likely adverse effect (without mitigation measures)					Likely positive effect			
Neutral/no effect					Uncertain effects			

Commentary on the SEA site assessment

- 5.31 The SEA site assessment finds that all sites perform well overall in relation to the population and communities theme, whilst all sites are anticipated to lead to neutral effects in relation to climate change.
- 5.32 The rich historic environment of Much Hadham is considered to give rise to potential adverse effects (without mitigation) at the former Barn School, the Bull Inn and Land north of Kettle Green Lane. Land at Hopley's stands out as the only site which records an uncertain effect in relation to the historic environment, on the basis that as a partly previously developed site the degree to which effects differ from those of existing development will be determined by the design and layout of a future scheme.
- 5.33 Land behind Windmill way stands out as notably poorly performing in relation to the transport SEA objectives on the basis that achieving safe vehicular access appears to be unfeasible. Land north of Kettle Green Lane does not support walking and cycling access to the village centre via car-free paths and consequently also scores poorly in relation to transport.

Establishing reasonable alternatives

- 5.34 In light of the above findings of the SEA site assessments and the findings of the Parish Council's separate site assessment process, the reasonable alternatives for Much Hadham are considered to be as follows:
- **Option 1:** Priest House + Land at Hopley's + The Bull Inn + Land at Former Barn School = 21 dwellings plus reserve site. MHPC preferred option (PO).
 - **Option 2:** PO *minus* Land at Former Barn School = 21 dwellings;
 - **Option 3:** PO *plus* Land behind Windmill Way = 37 dwellings;
 - **Option 4:** PO *plus* Land north of Kettle Green Lane = 41 dwellings.
- 5.35 Option 1 represents a package of sites considered to be strongest performing in terms of the balance of their proximity to services and facilities, location within the existing built area of the village and their accessibility, as well as the consideration of constraints and sensitivities. Recognising that this package of sites delivers below the identified housing need for Much Hadham, the next strongest site, land the Former Barn School, is allocated as a reserve site on the basis that the Parish Council are confident that it will become available for development in future. If the site does become available, it is believed to represent the next most sustainable location at which deliver growth.
- 5.36 Option 2 tests the same configuration of sites but without allocation of the reserve site to compare performance with Option 1.
- 5.37 Option 3 adds Land behind Windmill Way to the PO to test an option which meets need in full.
- 5.38 Option 4 tests a high growth option which adds Land north of Kettle Green Lane to the PO, on the basis that it has potential to meet and exceed housing need.

6. Assessing reasonable alternatives

Methodology

- 6.1 For each one of Options 1-4, the appraisal of reasonable alternatives examines likely significant effects on the baseline, drawing on the SEA objectives identified through scoping as a methodological framework. The intention is to distinguish between each of the alternative options in relative terms, i.e. test their performance under each SEA theme in relation to one another. Judgement must then be applied as to which option performs strongest overall.
- 6.2 Under each SEA theme (e.g. 'Biodiversity'), the appraisal looks to differentiate between the performance of the options in relation to the relevant SEA objectives. Where differentiation is possible, the options' relative performance is ranked in order of preference with '1' indicating strongest performance.
- 6.3 Where it is not possible to meaningfully differentiate between the options, their broadly equal performance is indicated with a '=' symbol.
- 6.4 Potential significant effects are indicated with highlighted text. **Green** is used to indicate significant positive effects, whilst **Red** is used to indicate significant negative effects.
- 6.5 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the options under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make certain assumptions regarding how options will be implemented 'on the ground' and what the effect on particular receptors would be. Where there is a need to rely on assumptions in order to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.
- 6.6 Finally, it is important to note that effects are predicted taking into account the criteria presented within the SEA Regulations.¹⁷ For example, account is taken of the duration, frequency and reversibility of effects.

Alternative assessment findings

- 6.7 Table 6.1 (overleaf) presents summary assessment findings in relation to the site options, with the more detailed assessment findings presented within **Appendix III**.
- 6.8 It is important to note that the assessment **does not assume** that each of the SEA themes are of equal weight. Therefore, establishing which option is strongest performing overall is not simply a question of tallying the individual scores achieved under each SEA theme. Judgement must be applied as to which SEA themes attract greatest weight in the context of Much Hadham and therefore which of the reasonable alternative options is most suitable for consideration as the preferred approach.

¹⁷ Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

Table 6.1: Summary alternatives assessment findings

SEA Theme	Option 1 <i>Priest House + Hopley's + Bull Inn + Barn School (reserve site)</i>	Option 2 <i>Option 1 minus Barn School</i>	Option 3 <i>Option 1 + Land behind Windmill Way</i>	Option 4 <i>Option 1 + Land north of Kettle Green Lane</i>
Biodiversity	=	=	=	=
Climate change	=	=	=	=
Landscape	1	1	2	3
Historic environment	1	1	1	2
Land, soil and water resources	1	1	2	2
Population and community	3	3	2	1
Health and wellbeing	=	=	=	=
Transport	1	1	2	2

Summary

- 6.9 The alternatives assessment has highlighted the potential for significant negative effects in relation to landscape and the historic environment from development under Option 4. This is on the basis that Option 4 directs some growth to land north of Kettle Green Lane which has significant landscape and historic environment sensitivity by virtue of its role in preserving the setting and character of the conservation area, the Grade I-listed Moor Park and the Moor Place Local Historic Park and Garden. Option 4 is considered to stand out as demonstrably the weakest performing option as it is the only alternative to register any significant negative effects on the baseline.
- 6.10 The assessment has also highlighted that Options 1 and 2 stand out as performing least strongly in relation to the population and community SEA objectives. This is on the basis that both options would under-deliver in relation to housing need over the plan period, instead relying on windfall development to make up the shortfall.
- 6.11 However, it is also notable that Options 1 and 2 perform most strongly in relation to all other SEA themes where it is possible to make a differentiation between the options, registering the joint strongest performance in relation to the landscape, historic environment, land, soil and water resources and transport SEA objectives.
- 6.12 The assessment has also found that significant positive effects are anticipated under Options 3 and 4 in relation to the population and communities SEA objectives on the basis that both meet and exceed identified housing needs.

7. Developing the preferred approach

- 7.1 Following a review of the evidence and consideration of community aspirations for the area, the MHNP proposes to allocate three sites for a total of at least 21 net new dwellings, plus a reserve site to be brought forward:
- **Priest House**, allocated for the development of at least seven (net) new dwellings of mixed housing type;
 - **Land at Hopley's**, allocated for the development of at least nine new dwellings, the majority of which should be 2 or 3 bedrooms.
 - **The Bull Inn**, allocated for the development of at least five new dwellings, which should all be smaller, single storey homes.
 - **Hill House and land to the rear (formerly known as Barn School)**, allocated as a reserve site with potential to be brought forward for development of around 25 homes once it becomes available at an as yet unknown future date.
- 7.2 The proposed allocation of these sites is informed by all of the available evidence, including extensive engagement with the community, the conclusions of the Parish Council's site assessment exercise, the Regulation 14 consultation responses, additional ongoing engagement with Historic England and with consideration of the findings of the SEA.
- 7.3 When read as a whole, the Parish Council considers that the available evidence indicates that these sites are the most suitable available location for sustainable growth in Much Hadham whilst minimising, and avoiding where possible, harm to the settlement's distinctive character, its significant historic assets, its setting within the wider landscape and the natural environment more broadly.
- 7.4 Additionally, engagement and consultation with the community during preparation of the plan has indicated there is community support for the findings of the site assessments and, by extension, allocation of the three proposed sites plus one reserve site.
- 7.5 The findings of the SEA have also informed and influenced the preferred approach as follows:
- When considered against reasonable alternatives, the SEA finds that the proposed package of sites performs most strongly overall. Whilst potential historic environment sensitivity was identified at **the Bull Inn** and at **Hopley's**, the plan proposes policy mitigation which is considered to be satisfactory in minimising the risk of harm.
 - Conversely, an alternative approach of allocating **Land north of Kettle Green Lane** was considered very likely to give rise to significant negative effects, the mitigation of which would be inherently problematic and unlikely to be achievable.
 - The final alternative approach of allocating **Land behind Windmill Way** was also found to have substantial problems which have no clear mitigation, this time in relation to highly constrained vehicular access. The absence of safe vehicular access is considered to make Land behind Windmill Way unsuitable for allocation and a poor location at which to deliver development.
- 7.6 Therefore, the Parish Council consider the under-delivery of housing through the preferred approach to be outweighed by the avoidance of potentially significant harm to the historic landscape setting of the village and its principal built and cultural heritage assets. This is in the additional context of strong recent windfall delivery providing confidence that further windfall sites will come forward, and also that the allocated reserve site may become available once the land ownership issues associated with it are resolved. It is considered this makes the preferred approach most closely aligned with the Neighbourhood Plan's overall vision and objectives.

Part 2: What are the SEA findings at this stage?

8. Introduction (to Part 2)

Introduction

- 8.1 This part of the report presents an assessment of the current pre-submission version of the Neighbourhood Plan.

Appraisal method

- 8.2 The assessment identifies and evaluates 'likely significant effects' on the baseline, drawing on the sustainability objectives identified through scoping (see **Table 3.1**) as a methodological framework.
- 8.3 For each theme 'significant effects' of the current version of the plan on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations.¹⁸ So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. These effect 'characteristics' are described within the assessment as appropriate.
- 8.4 Every effort is made to identify / evaluate effects accurately; however, this is inherently challenging given the high-level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

MHNP policies

- 8.5 The Neighbourhood Plan contains 28 policies, organised into 10 thematic chapters. These are presented in Table 8.1 below:

Table 8.1 List of policies in the Much Hadham Neighbourhood Plan

Policy theme	Policy
Housing	MH H1 Village Housing Number
	MH H2 Village Development Boundary
	MH H3 Type and Mix of Housing
	MH H4 Priest House
	MH H5 Land at Hopley's
	MH H6 The Bull Inn
	MH H7 Sites allocated with planning permission
	MH H8 Specialist Housing for Older and Vulnerable People
	MH H9 Hill House and Land to the Rear (formerly known as Barn School)
Design	MH D1 Design of New Development
	MH D2 Sustainable Design
	MH D3 Vehicle Parking Provision
	MH D4 Domestic Gates

¹⁸ Environmental Assessment of Plans and Programmes Regulations 2004

Policy theme	Policy
	MH D5 Bin Storage
Infrastructure, Transport and Communications	MH ITC1 Infrastructure, Transport and Communications
Local Economy and Employment	MH ET1 Economic Development
	MH ET2 Visitor Economy
Heritage Assets	MH HA1 Moor Place
	MH HA2 Non-Designated Heritage Assets
	MH HA3 Valued Community Assets and Assets of Community Value
Landscape and Natural Environment	MH LNE1 Wildlife Sites and Green Corridors
	MH LNE2 River Ash
Green Spaces	MH LGS1 Local Green Spaces
Priority Views	MH PV1 Priority Views
Community Facilities, Leisure and Recreation	MH CFLR1 Unclassified Roads
	MH CFLR2 Equine Development
	MH CFLR3 Recreational Open Space
Delivery and Monitoring	MH SP1 Funding Priorities

8.6 The draft Neighbourhood Plan policies are assessed below under eight headings, one for each of the SEA themes identified through the scoping process.

9. Appraisal of the ‘pre-submission’ version MHNP

- 9.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the pre-submission version of the Much Hadham Neighbourhood Plan.

Biodiversity

- 9.2 The biodiversity SEA objective seeks to protect and enhance biodiversity and geodiversity through the development process and the MHNP includes measures designed to ensure that biodiversity remains a focus.
- 9.3 The principal biodiversity-focussed policies are **LNE1** (Wildlife Sites and Green Corridors) and **LNE2** (The River Ash). LNE1 presents a clear requirement for development to “*conserve and enhance biodiversity and deliver net biodiversity gains in perpetuity*”. This clear and concise policy position is considered likely to help achieve positive effects in relation to the biodiversity SEA objective, particularly the explicit focus on achieving a net gain in biodiversity through the development process.
- 9.4 The policy also identifies specific sensitive features within the Neighbourhood Plan area and establishes a presumption against “*development which would cause significant harm*” to them. These features include designated ancient woodland; the River Ash, recognising its function as a habitat corridor; plus multiple local wildlife sites or habitats around the parish as identified through the Hertfordshire Ecological Network.
- 9.5 Policy **LNE2** expands on the protective measures for the River Ash, stating that there “*will be a presumption against development within 10 metres of the bank*”. Although the primary stated focus of the policy is flood prevention, there are likely to be associated indirect benefits for biodiversity through habitat preservation.
- 9.6 A number of other policies are likely to have some effect in relation to the biodiversity SEA objectives also. Policy **LGS1** (Local Green Spaces) identifies six sites which are currently open green spaces for protection from harm through development. The plan designates these six sites as Local Green Spaces, establishing Green Belt-level protection from development. Again, whilst these sites perform a range of functions, their continued openness will have secondary benefits for biodiversity via habitat and habitat corridor preservation.
- 9.7 Additionally, it is noted that all of the site allocation policies (**H4**, **H5**, **H6** and **H9**) include a site-specific requirement for development proposals to show that measures to contribute to an overall biodiversity net gain have been considered at each site.
- 9.8 Natural England has identified that the Neighbourhood Plan area falls within the 14.6km ‘zone of influence’ (Zol) of Hatfield Forest SSSI/NNR.¹⁹ Based on visitor survey evidence, the Zol is considered to be the area within which new residential development could lead to additional visitor pressure onto the SSSI/NNR and which may therefore have to contribute towards mitigation. This contribution could either be through provision of on-site Suitable Alternative Natural Greenspace (SANG) or through financial contributions towards off-site mitigation elsewhere. Currently, there is no recognition in the Neighbourhood Plan of Much Hadham’s location within the 14.6km Zol nor recognition of the potential implications of this for development proposed through the Neighbourhood Plan. It is recommended that an amendment is made to include acknowledgement of this.
- 9.9 Overall, **minor positive** effects are anticipated from the MHNP in relation to the biodiversity SEA objective.

¹⁹ https://www.uttlesford.gov.uk/media/9636/ED17-Natural-Trust-DRAFT-Mitigation-Strategy-for-Hatfield-Forest-Site-of-Special-Scientific-Interest-and-National-Nature-Reserve/pdf/ED17_Hatfield_Forest_Mitigation_Strategy_June_2019_FINAL.pdf?m=636971476750470000

Climate change (mitigation and adaptation)

- 9.10 The climate change SEA objectives have a dual focus of reducing the contribution of the Neighbourhood Plan area to climate change and also supporting resilience to the potential effects of climate change, particularly flooding. In practice, development plans can contribute to mitigating the effects of climate change by minimising greenhouse gas emissions from the built environment, whilst adapting to the effects of climate change means ensuring development is directed away from areas at greatest risk of flooding.
- 9.11 In terms of reducing emissions from the built environment, Policy **D2** (Sustainable Design) repeats the District Plan's position on the use of Hertfordshire County Council's 'Sustainable Design Toolkit'²⁰ which includes practical advice on implementing good practice sustainable design into new development. Whilst the use of the toolkit remains a recommendation, Policy **D2** does include a requirement that development proposals "*provide evidence that design principles based on the sustainable design objectives set out in the District Plan have been followed*". It is presumed this would be demonstrated through a design and access statement accompanying development proposals.
- 9.12 It is also noted that the supporting text of Policy **SP1** (Funding Priorities) includes "*carbon reduction initiatives*" for Parish Council-owned assets as a priority for S106 and CIL monies received from development. Whilst the net effect of this will be minimal in isolation, it sets a positive example of action that can be taken to retro-fit old buildings to reduce their carbon emissions and this is considered positive in principle.
- 9.13 In terms of ensuring development adapts to the effects of climate change, Policy **H5** (Land at Hopley's) performs well by directing growth away from areas at greatest risk of either fluvial or surface water flooding, whilst small localised areas of fluvial flood risk would be incorporated into open space via Policies **H4** (Priest House) and **H6** (The Bull Inn). Additionally, all of the site allocation policies require "*site surface water drainage*" to be incorporated to avoid surface water runoff onto the passing roadways during a rain event.
- 9.14 Recognising the role of the River Ash in flood management, Policy **LNE2** (River Ash) establishes a presumption against development "*within 10 metres of the bank of the river*" and additionally, any development which "*could lead to an increase in river flood risk*".
- 9.15 Policy **LGS1** (Local Green Spaces) provides protection against the loss of the Neighbourhood Plan area's green infrastructure. Whilst the primary function of the policy is not climate change related, protection and enhancement of green infrastructure can play a positive role in both mitigating and adapting to the effects of climate change, by both helping cool the built area of the settlement and preserving porous surfaces for water to drain into.
- 9.16 Overall, neither a clear positive or clear negative performance is identified in relation to the climate change SEA objectives and the Neighbourhood Plan is therefore considered likely to give rise to **neutral effects** in relation to climate change.

Landscape

- 9.17 The landscape SEA objectives focus on the protection and potential enhancement of the character and quality of landscapes and villagescapes within and surrounding the Neighbourhood Plan area.
- 9.18 The key spatial policy in this regard is Policy **H2** (Village Development Boundary), which amends the settlement boundary to incorporate the plan's site allocations. By keeping the settlement boundary tightly wrapped around the edge of the core built area the policy will help ensure that a presumption against development outside the boundary continues to protect against growth at more sensitive landscape settings elsewhere in the Neighbourhood Plan area.
- 9.19 Additional landscape protection is provided by Policy **PV1** (Priority Views) which identifies 12 view corridors that help project the rural character of the surrounding countryside into the

²⁰ <https://www.hertfordshire.gov.uk/microsites/building-futures/building-futures.aspx>

village centre and maintain views out of the village to the landscape beyond. To maintain the contribution of these views to Much Hadham's rural setting and character, the policy proposes that neither development itself nor screening around it should obstruct views. This is to be achieved by both restricting the height of new development and careful placement of new trees and hedges.

- 9.20 At a more detailed level, the key policy in relation to landscape and townscape is Policy **D1** (Design of New Development) which seeks to avoid harmful or incongruous new development, stating that *"all new buildings and extension should harmonise with their surroundings"*. By way of guidance, a detailed list of design criteria is provided to give clarity to future development proposals, including requiring development to *"respect and enhance local character"*, *"be in proportion to surrounding buildings"* and encouraging boundary planting to comprise *"hedging of appropriate native species, plain brick or flint walls"*.
- 9.21 The need to avoid or mitigate harmful effects on the villagescape and landscape character of Much Hadham is also individually recognised in each of the site allocation policies. Policy **H4** (Priest House) requires the design of any future scheme to *"respect the site's sensitive location on the edge of the village opposite a Local Green Space"* whilst Policy **H5** (Land at Hopley's) says future development should ensure *"the preservation of views, trees and landscaping"*. Similarly, Policy **H6** (The Bull Inn) seeks to address the inherent sensitivities of its perpendicular form and prominent location, stating that *"due to the topography of the site, and its sensitive location, the development will consist only of single storey homes"*. This could help new development on site avoid intruding visually into the sensitive character of the street scene on the High Street, whilst also remaining screened from views out to the rural landscape to the west.
- 9.22 Further detailed design policies, including **D4** (Domestic Gates) and **D5** (Bin Storage) provide additional protection to the street scene in Much Hadham, which in many parts of the village is distinctive and characterful. D4 seeks to avoid gate designs which obstruct views or limit active frontages onto the street scene, whilst D5 seeks provision of well-designed bin storage in new development to avoid bins being visible from roads and pavements.
- 9.23 The supporting text of Policy **HA1** (Moor Place) notes the contribution of the estate to the landscape setting of the village and of Moor Place itself. The policy text itself doesn't specifically reference the estate's landscape value, though by requiring development to avoid adverse effects on the estate's *"sense of place"* and the *"interaction of the estate with the village"* it is considered that suitable recognition and protection is established.
- 9.24 Collectively, these measures are considered likely to be effective in avoiding visual harm to the village's built character, whilst preserving its rural landscape setting and **minor positive effects** are anticipated in relation to the landscape SEA objectives.

Historic environment

- 9.25 The rich historic environment of Much Hadham makes a significant contribution to the identity of the village and the parish. Consequently, the historic environment SEA objectives look to protect and enhance the rich variety of cultural and built heritage within Neighbourhood Plan area.
- 9.26 The Grade I-listed Moor Place, and the estate which surrounds it, are key historic features of the village. Policy **HA1** (Moor Place) recognises this, with the supporting text stating that *"Moor Place is deserving of its own policy in order to ensure its integrity is preserved"*. The supporting text goes on to explain that the 2018 draft Landscape Heritage Assessment identifies the significance of the estate to broader appreciation of *"the landscape and setting of Moor Place ... and the sense of place that it creates in the centre of the village"*.
- 9.27 In this context, the policy text of **HA1** establishes a presumption against development proposals within the Moor Place estate unless accompanied by evidence which *"assessment the impact on the main features of the estate and ensures that the sense of place and the interaction of the estate with the village are enhanced"*.

- 9.28 Policy **HA2** Non-Designated Heritage Assets identifies a total of seven historic assets which do not benefit from protection via statutory designation. The policy is clear that development proposals which “*would harm the significance of a non-designated heritage asset, directly or by causing harm to its setting*” will not normally be supported.
- 9.29 The site allocation policies **H4**, **H5** and **H6** all direct growth to sites located within the conservation area, giving them potential for adverse effects. However, all three policies include a specific caveat that that development proposals will only be supported at the sites if “*the character of the conservation area is preserved or enhanced*”, as well as a broader requirement to “*complement the character*” of their immediate built environment.
- 9.30 Overall, it is considered that the plan establishes effective protection for, and seeks enhancement where possible of, Much Hadham’s historic assets and their settings. On balance, it is considered that **minor positive effects** are likely in relation to the historic environment SEA objectives.

Land, soil and water resources

- 9.31 SEA objectives for the land, soil and water resources theme focus on ensuring the effective and efficient use of land and using and managing water resources in a sustainable manner. In practice, a key focus is avoiding the unnecessary loss of best and most versatile agricultural land (i.e. Grades 1 to 3a).
- 9.32 None of the site allocation policies which bring forward development within the plan period (i.e. **H4**, **H5** and **H6**) will result in the loss of productive agricultural land. However, Policy **H9** (Hill House and Land to the rear (formerly known as Barn School) provides support in principle to future development on site of around 25 homes, subject to the site becoming available in future. The site is currently in largely agricultural use and future development could therefore have potential to result in the loss of some of this agricultural land.
- 9.33 However, for a number of reasons it is considered that the policy is unlikely to give rise to any direct effects in relation to land, soil and water resources. The site is not currently available for development, though the Parish Council are of the view that its availability may change in future. Policy H9 is therefore allocated only as a reserve site and, based on available evidence, cannot be assumed to have potential to support growth over the plan period. Direct effects are therefore considered likely to be neutral.
- 9.34 On balance, the plan is likely to have **neutral effects** in relation to the SEA objectives for land, soil and water resources theme, as neither positive nor negative effects are anticipated overall.

Population and communities

- 9.35 The population and community objectives focus on: catering for existing and future residents’ needs as well as the needs of different groups within the community; improving access to local, high-quality community services and facilities; and providing everyone with the opportunity to live in good quality, affordable housing, including an appropriate mix of dwelling sizes, types and tenures.
- 9.36 A key aspect of the population and communities SEA objectives is therefore ensuring that the plan brings forward sufficient development to meet identified housing needs. Much Hadham has an identified residual need of 31 dwellings over the plan period. However, the Policy **H1** (Village Housing Numbers) proposes allocation of only 23 dwellings, relying on windfall to ensure the full housing need is met. Although the village has high rates of recent windfall completions, it is considered that by not identifying sufficient land supply to meet identified needs through allocation the plan performs poorly in relation to this aspect of population and communities.
- 9.37 A key aspect of housing delivery is ensuring that an appropriate mixture of housing types and tenures is provided in order to meet a range of needs within the community. Policy **H3** (Type and Mix of Housing) therefore performs well, as it seeks to address a specific identified need within Much Hadham for suitable properties to enable “*younger people and downsizers*” by

- supporting development of 1, 2 and 3 bedroom homes only. This will help address concerns that the market has delivered a surplus of larger homes which has made it challenging for some residents to remain living locally.
- 9.38 Similarly, Policy **H8** (Specialist Housing for Older and Vulnerable People) “*encourages provision of specialist housing*” for older or vulnerable residents, providing support in principle for such development proposals, subject to being “*within walking distance, on a safe and level route or within easy reach by passenger transport*” of village centre shops services.
- 9.39 Policy **H2** (Village Development Boundary) defines a boundary tightly around the edge of the built area where development will be focused, to help ensure that future growth will be delivered within close proximity of existing services and facilities in the village. In accordance with District Plan Policy GBR2, areas outside of the defined confines will be treated as rural areas beyond the Green Belt where development will be carefully controlled. This should help avoid growth which is isolated from facilities, ensuring new homes have accessibility to village services.
- 9.40 Policy **H4** (Priest House) specifically recognises the potential for development to impact on neighbouring properties, stating that development will be supported provided that “*the amenity of immediate neighbours is respected*”. This is considered positive in relation to the need to minimise effects on existing residents and it is not clear why only the Priest House site is given this additional criterion. It is recommended that Policies **H5** (Land at Hopley’s) and **H6** (The Bull Inn) add a similar criterion.
- 9.41 Policy **HA3** (Valued Community Assets) identifies five specific community assets for retention in their community use unless no longer needed or replaced by “*equivalent or better*” facilities. These are the village shop, health centre and pharmacy, the Bull and Prince of Wales pubs and the village car park. Additionally, Policy **H6** (The Bull Inn) recognises that the existing pub is a valued community asset and consequently includes a requirement that development proposals include “*a construction management plan to ensure that the commercial operation of the public house is maintained during construction of the new homes*”.
- 9.42 Policy **H1** (Settlement Development Boundary) includes a minor boundary amendment to enable a popular café and retail business to be extended within the settlement boundaries. This will likely help sustain the vitality of the business and support a “*valued community asset and local employment*”.
- 9.43 Policy **SP1** (Funding Priorities) also sets out a proposed list of community facilities to which Section 106 and CIL funds will be directed, including a range of community services such as investment in “*the sports ground and village hall*” and “*improving local facilities and increasing the number of local events*” for the village’s elderly community.
- 9.44 Overall, many aspects of the plan perform well in relation to the population and communities SEA objectives. However, it is not possible to conclude significant positive effects overall as the plan provides below the minimum housing need for the village. It is recognised that there could be potential to deliver additional housing at the reserve site via Policy **H9** (Hill House and land to the rear formerly known as Barn School). However, this will be substantially determined by land ownership issues beyond the control of the Parish Council and so cannot be assumed to come forward during the plan period. On balance overall, **minor positive effects** are anticipated in relation to population and communities.

Health and wellbeing

- 9.45 The SEA health and wellbeing objective is to improve the health and wellbeing of residents within the Neighbourhood Plan area. In practice, Neighbourhood Plans can have a role to play in achieving this objective by seeking to protect and enhance opportunities for residents to make healthy behaviour choices, particularly in terms of walking and cycling.
- 9.46 All three site allocations are considered to perform well in this context as they all have potential to support healthy travel choices for meeting a range of needs within the village. Policy **H4** (Priest House) would deliver growth at a location around a 4-minute walk from the village shop along safe car-free footpaths, and is a similar distance from the school and playing fields.

Policy **H5** (Land at Hopley's) and Policy **H6** (The Bull Inn) also allocate sites within a short walk of the key village services. It is considered likely that walking or cycling would be the preferred mode of travel for accessing village centre facilities from all of the sites and that all three policies therefore support healthy travel choices in the context of the Neighbourhood Plan area.

- 9.47 The supporting text of Policy **CFLR1** (Unclassified Roads) goes into detail about the array of recreational walking, cycling and horse-riding opportunities around the village, noting that *"the parish is well situated"* in relation to *"local footpaths, lanes and bridleways"* and recognising that using this network is *"a means of keeping healthy and promoting overall well-being"*. In this context, the policy itself is positive in relation to health and wellbeing, as it extends protection to minor unclassified roads around the village, requiring new development to avoid adding traffic that could *"adversely affect their ability to continue to function safely as routes for walking, cycling and horse-riding"*. In the context of public rights of way (i.e. footpaths and bridleways) already benefitting from statutory protection, this is a proportionate approach to extending some protection to the pedestrian function of non-PRoW laneways.
- 9.48 The plan also takes steps to ensure that existing recreational facilities in the village are protected and enhanced where possible. Policy **CFLR3** (Recreational Open Space) establishes a presumption against development which would result in the loss of all or part of the allotments, the school playing fields and the village recreation ground, unless they are re-provided with enhanced facilities. Policy **SP1** (Funding Priorities) also sets out a proposed list of facilities to which Section 106 and CIL funds will be directed towards, including a range of community facilities with health and wellbeing benefits, such as investment in *"the sports ground and village hall"* and *"improvement and maintenance of public rights of way"*.
- 9.49 Based on the above, **minor positive effects** are considered likely in relation to the health and wellbeing SEA objectives. Significant effects are not anticipated.

Transportation

- 9.50 The transportation objectives for the SEA theme seek to promote sustainable transport use and reduce the need to travel, whilst maintaining and improving the transport infrastructure within the Neighbourhood plan area.
- 9.51 There is a theme running throughout the plan of promoting and supporting pedestrian and cycling connectivity where possible. This has been outlined above under the 'health and wellbeing' SEA theme and is therefore not expansively discussed again here, although it is important to note that positive effects are anticipated from the plan as whole in relation to promoting sustainable transport where it is practical to do so.
- 9.52 Each of the site allocation policies requires new development to provide parking provision consistent with Policy **D3** (Vehicle Parking Provision). The policy sets detailed parking standards to be achieved through the development process including an increase from the standards set out in the District Plan. The departure from the District Plan standards rounds up the number of spaces required per unit, e.g. requires provision of 3 spaces where the District Plan requires 2.5. There is some merit to this in terms of reflecting the fact that Much Hadham is a rural settlement with relatively high car dependency.
- 9.53 Policies **ET1** (Economic Development) and **ITC1** (Infrastructure, Transport and Communications) could have potential for minor positive effects in relation to reducing the need to travel. ET1 provides support in principle for *"new business and employment opportunities"* in the plan area, while ITC1 requires development proposals to be *"ready to accept underground fibre to the premises broadband connectivity"*. Both policies could help support either working from home or working locally within the village, reducing the need to travel by car to employment elsewhere. Separately, Policy ITC1 also seeks to minimise the disruption to traffic in the village caused by new development, stating that development proposals should undertake a traffic assessment and *"include measures to mitigate any impacts"* that are identified.
- 9.54 Finally, Policy **CFLR1** (Unclassified Roads) seeks to avoid adverse effects to the *"tranquil nature of unclassified roads"* in the plan area, recognising that these are both intrinsic to the

character of the area and require low traffic volumes to remain safe for non-motorised forms of travel, specifically “*walking, cycling and horse-riding*”. The policy requirement is that new development “*must respect*” the current tranquillity of these lanes, though there is no specific interpretation of this provided in either the supporting or policy text. It is assumed that in practice this means that development proposals should be accompanied by evidence, such as traffic modelling, which demonstrates that traffic flows will not substantially increase along these minor lanes as a result of new development. However, the current wording is ambiguous and it is therefore recommended that the policy wording, or the detail in the supporting text, is amended to provide clearer instruction to future applicants.

9.55 Overall, **minor positive effects** are anticipated in relation to the transport SEA objectives.

10. Conclusions and recommendations

10.1 Overall the appraisal of the MHNP has identified potential for positive effects, though these effects are not likely to be significant in their magnitude. The appraisal has not identified the potential for significant negative effects from the MHNP's proposed policies and allocations. The SEA themes found to be most sensitive to development in the MHNP area are historic environment and landscape.

10.2 Key findings are:

- In relation to the historic environment, a key concern is avoiding harm to the village's conservation area and its high grade listed assets (Grade II* and Grade I), notably Moor Place and Much Hadham Hall which are nearest to the proposed site allocations. Overall, the policies as applied to the proposed site allocations are likely to be effective in mitigating and avoiding specific harm, whilst the policies of the Neighbourhood Plan as a whole are considered likely to avoid harm to the historic environment more broadly, including the Much Hadham conservation area.
- In terms of landscape, a key concern is avoiding harm to the rural setting and context of the village and Much Hadham's distinctive and attractive villagescape character. Again, the policies of Neighbourhood Plan are considered likely to deliver growth which does not result in adverse effects to how the village is perceived within the landscape or to the character of its built area.
- The shortfall in meeting identified housing need stands out as a notable feature of the MHNP. However, it is recognised that this should be seen in the context of significant constraints at other available sites and the potential for the reserve site to come onstream over the plan period which would unlock additional land supply sufficient to meet and exceed housing needs.
- Minor positive effects are anticipated in relation to the: biodiversity; landscape; historic environment; population and communities; health and wellbeing; and transportation SEA themes.
- Neutral effects are anticipated in relation to the: climate change and land, soil and water resources SEA themes.
- Potential negative effects are not identified in relation to any of the SEA themes.

10.3 Overall it is considered that the MHDC takes a proportionate approach to delivering sustainable new development where possible, whilst protecting key aspects of the natural, built and historic environment that contribute to the overall sense of place and quality of life in the Much Hadham.

Part 3: What are the next steps?

11. Next steps (Part 3)

11.1 This part of the report explains next steps that will be taken as part of plan-making and SEA.

Plan finalisation

- 11.2 This Environmental Report accompanies the submission version of the Much Hadham Neighbourhood Plan for submission to the Local Planning Authority, East Herts District Council, (EHDC) for subsequent Independent Examination.
- 11.3 At Independent Examination, the Neighbourhood Plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the adopted East Hertfordshire District Plan.
- 11.4 If Independent Examination is favourable, the Much Hadham Neighbourhood Plan will be subject to a referendum, organised by EHDC. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the Much Hadham Neighbourhood Plan will become part of the Development Plan for East Herts, covering the defined Neighbourhood Plan area.

Monitoring

- 11.5 The SEA regulations require 'measures envisaged concerning monitoring' to be outlined in this report. This refers to the monitoring of likely significant effects of the MHNP to identify any unforeseen effects early and take remedial action as appropriate.
- 11.6 It is anticipated that monitoring of effects of the Neighbourhood Plan will be undertaken by EHDC as part of the process of preparing its Annual Monitoring Report (AMR).
- 11.7 The SEA has not identified any potential for significant negative effects that would require closer monitoring.

Appendices

Appendix I: Regulatory requirements

As discussed in Chapter 1 above, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 (the Regulations) explains the information that must be contained in the Environmental Report; however, interpretation of Schedule 2 is not straightforward. **Table A** links the structure of this report to an interpretation of Schedule 2 requirements, whilst **Table B** explains this interpretation. **Table C** identifies how and where within the Environmental Report the regulatory requirements have/ will be met.

Table A: Questions answered by this Environmental Report, in-line with an interpretation of regulatory requirements

	Questions answered		As per regulations... the Environmental Report must include...
Introduction	What's the plan seeking to achieve?		<ul style="list-style-type: none"> An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
	What's the SEA scope?	What's the sustainability 'context'?	<ul style="list-style-type: none"> Relevant environmental protection objectives, established at international or national level Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What's the sustainability 'baseline'?	<ul style="list-style-type: none"> Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan The environmental characteristics of areas likely to be significantly affected Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
Part 1	What has plan-making / SEA involved up to this point?		<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) The likely significant effects associated with alternatives Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
Part 2	What are the SEA findings at this current stage?		<ul style="list-style-type: none"> The likely significant effects associated with the draft plan The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
Part 3	What happens next?		<ul style="list-style-type: none"> A description of the monitoring measures envisaged

Appendix II The scope of the SEA

Introduction

This appendix provides an overview of the responses to the scoping consultation, summarises the baseline and context review and presents the full SEA framework.

Scoping consultation responses

The draft SEA scoping report was shared with the Environment Agency, Historic England and Natural England plus East Herts District Council for formal consultation between 31st March and 5th May 2020.

A summary of responses received and how they have been considered and addressed are presented in Table II.1 below.

Table II.1: SEA scoping consultation responses

Consultee	Consultation response summary	How the response was considered and addressed in the SEA
Environment Agency	The EA has no specific comments to make on this neighbourhood plan SEA scoping.	n/a
Historic England	Historic England consider the scoping report includes a comprehensive baseline and are pleased with the sources of information identified. Two further sources are suggested – the local heritage at risk register and the Hertfordshire Gardens Trust in relation to Moor Park and the Lordship.	A search of the heritage at risk register revealed no features within the Plan Area. The local Historic Parks and Gardens designation has been referenced in the site appraisal section of the SEA environmental report where relevant.
Natural England	Natural England are concerned that the scoping report does not identify the potential for adverse effects to Hatfield Forest Site of Special Scientific Interest (SSSI) and National Nature Reserve (NNR) based on Much Hadham's location within the Impact Risk Zone of the SSSI. Natural England are concerned that development in the Neighbourhood Plan are could give rise to increased recreational pressure from visitors. In addition to the IRZ, a 14.6km 'zone of influence' (ZoI) has been identified around Hatfield Forest within which new residential housing is likely to damage the interest features of the SSSI/NNR. Much Hadham is around 7km from the boundaries of Hatfield Forest and is therefore within the ZoI. This should be included within to the scope of the SEA.	The SEA plan appraisal includes discussion of the Hatfield Forest ZoI and a recommendation that the Neighbourhood Plan be amended to include acknowledgement of the implications of Much Hadham's location within the ZoI for development proposed through the plan.

Context and baseline review

Drawing on the review of the sustainability context and baseline, the scoping report process identified a range of sustainability issues that should be focus of SEA. These key baseline issues are presented below under eight environmental themes.

Biodiversity

- There are 15 Local Wildlife Sites, and other locally designated and non-designated habitats, such as ancient woodland and the River Ash, within the Plan area. The habitats and corridors contribute to overall ecological connectivity and should be both retained and enhanced in future development.

- There are no nationally or internationally designated sites within the Neighbourhood Plan area though the whole parish falls within the 14.6km Zone of Influence of the Hatfield Forest SSSI/NNR.

Climate change (mitigation and adaptation)

- Development of new housing and infrastructure within the Neighbourhood Plan area has the potential to increase the local carbon footprint and overall greenhouse gas emissions in Much Hadham. It will be important for new development to maximise efficiency and opportunities for small-scale renewables.
- Total emissions for East Herts have reduced by roughly 30% from around 1,000 kt CO₂ (kilo-tonnes of carbon dioxide) per year to 675 kt CO₂. However, a sector specific look at the emissions demonstrate that emissions from road transport are currently increasing. A key consideration for growth in Much Hadham will be opportunities to both reduce the need to travel, and enhance local active travel networks.
- Flood risk is a significant concern for the MHNP area. It will be important that the growth strategy of the MHNP seeks to minimise the risk of flooding in respect of new housing development.

Landscape

- Recommended strategies for the LCA areas in Much Hadham are 'conserve and strengthen', 'conserve and restore' or 'safeguard and manage' in order to improve both the condition and strength of landscape character as necessary to reinforce its distinctiveness.
- Development of the area may alter the character and appearance of the landscape and affect key views, it could also reduce the sense of tranquillity. Landscape features that contribute to the overall character and quality of the place, including trees, hedgerows and areas of open space, should be retained and enhanced in new development where possible.

Historic Environment

- Much of the settlement area lies within the designated Much Hadham Conservation Area and as such, new development has high potential to effect designated heritage settings and features that contribute to the significance of the area. It will be important that development delivers high-quality design and landscaping that sensitively responds to its context and setting.
- The Neighbourhood Plan area contains 6 buildings designated as Grade I, 133 at Grade II, and 12 at Grade II*. These buildings will be sensitive receptors in terms of new development in the settlement.
- There are 5 locally listed Historic Parks and Gardens in the Much Hadham neighbourhood plan area and development should protect the integrity and significance of these sites, to include the retention and protection of key views.
- The MHNP is recognised as of high archaeological significance and development will need to consider appropriate archaeological investigation prior to any works on site, undertaking appropriate consultation with Historic England where necessary.

Land, soil and water resources

- Greenfield development has a high potential to impact upon best and most versatile (high-quality) agricultural land resources.
- A significant proportion of the Plan area lies within a Mineral Safeguard Zone, where consultation would be required with the minerals authority prior to development to establish the economic viability of prior extraction and/ or suitable mitigation measures.
- There is a significant water environment in the Plan area; the River Ash is a valued chalk-stream and surface water in the catchment area affects the quality of water supplies. It will

be important for new development to ensure appropriate mitigation is in place to maintain and protect good water quality.

- New development should seek to maximise water efficiency and opportunities for water harvesting and water recycling, to support the wider management aims for the catchment in maintaining future water supplies.

Population and communities

- The plan area has an ageing population. Meeting the varying needs of older people whilst ensuring that the district remains attractive and accessible to young people will be a challenge.
- It will be important for the MHNP to consider how delivery of the overall housing requirement for the village can also promote sustainable patterns of development, and to ensure they are able to deliver the right mix of housing types, tenures and sizes.
- Economic activity within the plan area is comparatively lower than district, regional and national figures. Further, the proportion of residents with no qualifications is comparatively high. Hence, a key challenge will involve equipping residents with strategic infrastructure that best supports ambitions of the council to oversee economic development and enhanced education opportunities for residents (Policy MH ET1: Economic Development).

Health and Wellbeing

- Planning can potentially influence some of the health indicators identified in the baseline. In particular, health outcomes relating to air quality are likely to be affected by increased development in the Plan area. The location of development in respect of its opportunities to minimise the need to travel and maximise travel by more sustainable modes of transport will be a key consideration for the Neighbourhood Plan in this respect. The promotion of active travel networks can have multiple benefits for health in terms of both air quality and physical exercise.
- Health indicators may also be influenced by the retention and enhancement of community infrastructure (including health facilities) and green infrastructure (including public open spaces and recreational areas).

Transport

- A lack of direct rail connections and limited bus services make new development likely to continue trends of an increased reliance on private vehicle use. It will be important in this respect to deliver a growth strategy that both minimises the need to travel to access day-to-day needs and maximises opportunities to travel by more sustainable modes of transport, including active travel networks.
- With a large proportion of smaller roads in the Plan area, it will be important for development to consider its impacts on local road capacity and deliver the necessary infrastructure upgrades required to accommodate growth.

SEA framework

The full scope of the SEA, taking account of the responses to the scoping consultation, is presented in Table II.2 below:

Table II.2 Full SEA framework

SEA theme	SEA objective	Assessment Questions: Will the option or policy...:
Biodiversity	Protect and enhance all biodiversity and geodiversity.	<ul style="list-style-type: none"> Support the status of the locally designated sites within and surrounding the Neighbourhood Plan area? Protect and enhance priority habitats and species? Achieve a net gain in biodiversity? Support enhancements to multifunctional green infrastructure networks which include ecological corridors and connections between habitats? Support access to, interpretation and understanding of biodiversity and geodiversity?
Climate change	Continue to decrease GHG emissions.	<ul style="list-style-type: none"> Promote sustainable development, including sustainable construction and operation of new housing and employment land? Promote energy efficiency and renewable energy generation including solar panels, energy efficient buildings and recycled water and materials? Locate development so as to minimise the need to travel, and maximise opportunities to travel by more sustainable modes of transport, in particular active travel opportunities?
	Increase the resilience of the Neighbourhood Plan area to the effects of climate change.	<ul style="list-style-type: none"> Ensure that development avoids areas of highest flood risk? Increase the resilience of the built and natural environment to the effects of climate change, including flood resilience measures such as Sustainable Drainage Systems and enhancements to ecological networks, green infrastructure and biological connectivity?
Landscape	Protect and enhance the character and quality of landscapes	<ul style="list-style-type: none"> Conserve and enhance locally important landscape features within the Neighbourhood Plan area as defined by the supporting evidence base? Support the retention and enhancement of existing landscape features at proposed development sites where possible? Conserve and enhance local diversity and character, including the character and identity of the Neighbourhood Plan area? Protect locally important viewpoints contributing to the sense of place and visual amenity of the Neighbourhood Plan area?
Historic environment	Protect, conserve and enhance the historic environment within the Neighbourhood Plan area.	<ul style="list-style-type: none"> Conserve and enhance the significance of buildings and structures of architectural or historic interest, both designated and non-designated, and their settings? Identify and protect the key characteristics and features of the Much Hadham Conservation Area? Conserve and enhance the special interest, character and appearance of locally important features and their settings? Support access to, interpretation and understanding of the historic evolution and character of the environment? Conserve and enhance archaeological remains, including historic landscapes?
Land, soil and water resources	Ensure the efficient and effective use of land, protect soil quality and avoid the loss of high-quality agricultural land.	<ul style="list-style-type: none"> Minimise loss of areas of 'Best and Most Versatile' agricultural land? Avoid the unnecessary sterilisation of mineral resources in the Plan area?

SEA theme	SEA objective	Assessment Questions: Will the option or policy...:
	Use and manage water resources in a sustainable manner.	<ul style="list-style-type: none"> • Support improvements to water quality? • Protect surface water and groundwater resources from pollution? • Ensure that development does not cause further deterioration of water quality for key watercourses in the Neighbourhood Plan area? • Ensure appropriate drainage and mitigation is delivered alongside development? • Minimise water consumption?
Population and community	Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.	<ul style="list-style-type: none"> • Support the provision of a range of house types, tenures and sizes? • Support the delivery of affordable housing to meet locally identified needs. • Meet the needs of all sectors of the community? • Provide quality and flexible/ adaptable homes that meet people's needs? • Promote the use of sustainable building techniques, including use of sustainable building materials in construction? • Provide housing in sustainable locations that allow easy access to local services and facilities?
	Reduce deprivation and promote an inclusive and self-contained community, maximising access to local, high-quality community services and facilities.	<ul style="list-style-type: none"> • Maintain and/ or improve the provision of community infrastructure, services and facilities? • Support accessibility enhancements and opportunities to promote active travel networks within the Plan area? • Encourage and promote social cohesion and encourage active involvement of local people in community activities? • Maintain or enhance the quality of life of existing residents?
Health and wellbeing	Improve the health and wellbeing of residents within the Neighbourhood Plan area.	<ul style="list-style-type: none"> • Promote accessibility to a range of leisure, health and community facilities, for all age groups? • Enhance community access to green infrastructure? • Promote the use of healthier modes of travel, including active travel networks?
Transportation	Promote sustainable transport use and reduce the need to travel.	<ul style="list-style-type: none"> • Ensure sufficient road capacity to accommodate new development? • Enable sustainable transport infrastructure enhancements, including active travel networks? • Facilitate home and remote working? • Improve road safety? • Reduce the impact on residents from the road network?

Appendix III Reasonable alternatives assessment

This appendix presents the detailed findings of the assessment of alternative locations for growth within the MHNP area, as established within Section 5 of the main report.

III.1 Methodology

To reiterate, for each of the options, the appraisal of reasonable alternatives examines likely significant effects on the baseline, drawing on the SEA objectives identified through scoping as a methodological framework. The intention is to distinguish between each of the alternative options in relative terms, i.e. test their performance under each SEA theme in relation to one another. Judgement must then be applied as to which options performs strongest overall.

Under each SEA theme (e.g. 'Biodiversity'), the appraisal looks to differentiate between the performance of the options in relation to the relevant SEA objectives. Where there is a distinction between the options, their relative performance is ranked in order of preference with '1' indicating strongest performance.

Where it is not possible to meaningfully differentiate between the options, their broadly equal performance is indicated with a '=' symbol.

Potential significant effects are indicated with highlighted text. **Green** is used to indicate significant positive effects, whilst **Red** is used to indicate significant negative effects.

Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the options under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make certain assumptions regarding how options will be implemented 'on the ground' and what the effect on particular receptors would be. Where there is a need to rely on assumptions in order to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text.

Finally, it is important to note that effects are predicted taking into account the criteria presented within the SEA Regulations.²¹ For example, account is taken of the duration, frequency and reversibility of effects.

III.2 Assessment findings

Table III-1 below presents the SEA findings in relation to the reasonable alternatives for the MHNP area.

It is important to note that the assessment **does not assume** that each of the SEA themes are of equal weight. Therefore, establishing which Option is strongest performing overall is not simply a question of tallying the individual scores achieved under each SEA theme. Judgement must be applied as to which SEA themes attract greatest weight in the context of Much Hadham.

Table III-1: SEA of reasonable alternatives for the location of growth

SEA Theme	Option 1 <i>Priest House + Hopley's + Bull Inn + Barn School (reserve site)</i>	Option 2 <i>Option 1 minus Barn School</i>	Option 3 <i>Option 1 + Land behind Windmill Way</i>	Option 4 <i>Option 1 + Land north of Kettle Green Lane</i>
Biodiversity	=	=	=	=

²¹ Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

	Option 1 <i>Priest House + Hopley's + Bull Inn + Barn School (reserve site)</i>	Option 2 <i>Option 1 minus Barn School</i>	Option 3 <i>Option 1 + Land behind Windmill Way</i>	Option 4 <i>Option 1 + Land north of Kettle Green Lane</i>
SEA Theme				

Commentary:

There are no internationally or nationally designated biodiversity sites within the plan area and there does not appear to be any notable sensitivity in relation to biodiversity. Consequently there is little potential for significant effects in relation the biodiversity SEA objectives from any of the options. It is noted that all options would include development at the Priest's House site which is adjacent to the River Ash and there could be some potential to explore whether the site has any associated function as part of a wildlife corridor for marine and terrestrial wildlife. However, it is considered unlikely that there would be any meaningful opportunity to deliver significant habitat enhancements through the development process. Overall, it is considered that it is not possible to meaningfully differentiate between the options in relation to biodiversity and that they all perform broadly on a par. No significant effects are anticipated.

Climate change

=

=

=

=

Commentary:

In terms of climate change adaptation, it is notable that the plan area as a whole has very limited areas of fluvial flood risk. Though small peripheral areas of localised fluvial flood risk are evident in sites allocated under all options, these could reasonably be incorporated into areas of open space and not form part of the site's developable area. However, surface water flood risk within the plan area is much more extensive. All options include growth at the Bull Inn site which stands out as being partly affected by an area of surface water risk, including a band of high risk (i.e. greater than 3.3% annual chance of flooding). However, the potential risk could likely be mitigated through the design and layout of any future scheme on the site, and as all options include the site it does not help differentiate between them. Therefore, the options all perform broadly on par with each other in relation to fluvial and surface water flooding.

In terms of climate change mitigation, it is considered that there is no potential to meaningfully differentiate between the sites in relation to reducing contributions to climate change. Each site is within walking distance of Much Hadham's range of services and in the context of the village's rural location each is considered to have equal car dependency for accessing services at higher tier settlements. The relatively small number of new homes proposed for delivery through the plan means there is no realistic potential through any of the options to seek delivery of, or connectivity with, district heating networks.

Overall, it is considered that the options perform broadly on a par in relation to the SEA climate change objectives. Significant effects are not anticipated.

Landscape

1

1

2

3

Commentary:

Option 4 includes growth at Land north of Kettle Green Lane, a site considered to have potential for significant negative effects in relation to landscape. This is on the basis that development under the option would erode the characterful landscape gap between the village centre and Moor Place with potential to undermine the landscape setting of each. The potential for significant negative effects under Option 4 is identified.

Option 3 performs better than Option 4 because although it directs growth to the greenfield site Land behind Windmill Way, the site is notably less prominent within the landscape and the effect on the village's landscape setting and character is likely to have correspondingly lower potential to result in adverse effects.

However, by virtue of delivering all growth at sites within the built area of the village, Options 1 and 2 are considered to perform most strongly overall in relation to the landscape SEA objectives. Although Option 2 includes the large reserve site Land at Former Barn School, this will not bring forward any development during the plan period and therefore is not considered to give rise to any additional effects at this stage. Option 1 and 2 are therefore considered to perform on a par with each other.

Historic environment

1

1

1

2

Commentary:

	Option 1 <i>Priest House + Hopley's + Bull Inn + Barn School (reserve site)</i>	Option 2 <i>Option 1 minus Barn School</i>	Option 3 <i>Option 1 + Land behind Windmill Way</i>	Option 4 <i>Option 1 + Land north of Kettle Green Lane</i>
SEA Theme				

Option 4 directs growth to an area of significant historic environment sensitivity. By bringing forward development at Land north of Kettle Green Lane Option 4 is considered likely to give rise to negative effects in relation to the historic character of the Much Hadham Conservation Area, the wider setting of Grade I-listed Moor Place and the immediate setting Grade II-listed Back Lodge, Yewtree Cottage. Cumulatively, these effects are considered to be significant.

All three other options are considered to perform on a par with one another. This is because the only variable sites are the reserve site (Land at Former Barn School), delivered under Options 1 and 3, which will not deliver growth within the plan period, and Land behind Windmill Way under Option 3 which does not have any notable historic sensitivity.

It is recognised that Much Hadham as a whole has significant historic environment sensitivity and new development must be sensitively designed and laid out to ensure it is appropriate for its location in the village. However, the general sensitivity associated with village-wide historic character is considered to apply to each of the options and does not provide a basis differentiate between them.

Land, soil and water resources

1

1

2

2

Commentary:

By virtue of directing growth to land largely within the boundaries of the village, Options 1 and 2 avoid development on greenfield sites at the village periphery and will not lead to the loss of productive agricultural land within the plan period. It is recognised that Option 1 includes Land at Former Barn School which is in agricultural use, though it will not deliver growth within the plan period and will therefore not result in the loss of agricultural land through this iteration of the plan.

Option 3 and Option 4 perform less strongly on the basis that both direct growth to sites in productive agricultural use at Land behind Windmill Way and Land north of Kettle Green Lane respectively. Both sites have potential to be underlain by 'best and most versatile' land, the unnecessary loss of which should be avoided where possible. Therefore, overall Options 1 and 2 perform best and on a par with each other, whilst Options 3 and 4 perform less strongly but also broadly on a par with one another. Significant effects are not anticipated under any option.

Population and communities

3

3

2

1

Commentary:

Options 1 and 2 are considered to perform poorly in terms of housing delivery on the basis that both deliver below the identified housing need for Much Hadham. Both options will achieve around 23 new dwellings in the plan period, 8 below the residual housing need of 31. It is important that identified housing needs are met where possible to ensure a broad range of housing types and tenures are delivered to meet different needs within the community and to help sustain settlement vitality. Therefore, by delivering only around 75% of identified housing need there could be minor negative effects in relation to the population and communities SEA objectives.

By contrast, Option 3 and Option 4 would both deliver above the identified housing need for the village, at 39 and 43 dwellings respectively. This will enable the broadest possible housing mix to be delivered, including potential to deliver a greater quantum of affordable housing. Significant positive effects are anticipated under both Option 3 and Option 4, with Option 4 performing slightly more strongly by virtue of having potential to deliver the highest quantum of growth.

Health and wellbeing

1

1

1

2

Commentary:

All options are considered to present similar opportunities for enabling recreational walking and cycling locally, though Much Hadham's rural location means all options have a similar level of constraint in respect of promoting walking and cycling for longer distances. Access to the network of public rights of way (PRoW) around Much Hadham will have both physical and mental health and wellbeing benefits for residents of development under any of the options, and all are considered likely to result in minor positive effects.

However, whilst Options 1, 2 and 3 have similar levels of accessibility to the existing services in the village, including healthcare facilities, Option 4 cannot support car-free footpaths to the village centre by virtue of the narrow and constrained Kettle Green Lane. In light of the above, it is not possible to meaningfully differentiate between Options 1, 2 and 3, which are considered to perform on a par with each other. However, Option 4 is

	Option 1 <i>Priest House + Hopley's + Bull Inn + Barn School (reserve site)</i>	Option 2 <i>Option 1 minus Barn School</i>	Option 3 <i>Option 1 + Land behind Windmill Way</i>	Option 4 <i>Option 1 + Land north of Kettle Green Lane</i>
SEA Theme				

considered to perform less strongly in relation to health and wellbeing as it will include growth at a site from which active travel choices will not be promoted. Significant effects are not anticipated.

Transport

1**1****2****2**

Commentary:

The SEA transport objectives seek growth at locations with potential to promote walking and cycling over private car use and which reduce the need to travel overall. Options 1, 2 and 3 are all considered to have potential to support walking and cycling access to key village services along footpaths and pavements which are segregated from traffic. Option 4 would deliver growth at Land north of Kettle Green Lane, a site from which direct car-free pedestrian access to the village centre is not achievable. However, Option 3 is considered to perform less strongly than Options 1 and 2 on the basis that it would deliver growth at Land behind Windmill Way, a location which does not appear to support safe vehicular access because of its constrained location down a narrow access track with no apparent feasible prospect of enhancement.

Overall, Options 1 and 2 perform more strongly compared to Options 3 and 4.

