

**Haversham-cum-Little Linford Neighbourhood Plan**

**Strategic Environmental Assessment (SEA)**

**Draft Environmental Report**

**February 2022**

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## 1.0 Introduction

### 1.0 Background

1.0.1 This Strategic Environmental Assessment (SEA) is being undertaken in support of the emerging Haversham-cum-Little Linford Neighbourhood Plan (HNP). The HNP is being prepared, under the Neighbourhood Planning Regulations 2012, in accordance with the Localism Act 2011. The Plan, once adopted, will present planning policy and guidance for the parish as part of the wider Development Plan. It will provide a spatial framework for determining planning applications up to 2031.

### 1.1 SEA Explained

1.1.1 SEA is a mechanism for considering and communicating the likely effects of a draft Plan, and alternatives, with a view to avoiding and mitigating adverse environmental effects and maximising the positives, where possible. SEA is a legally required process which must be undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations (2004) (the 'SEA Regulations') which were prepared in order to transpose into national law the European SEA Directive<sup>1</sup>.

1.1.2 To meet the requirements of the SEA Regulations, a report (the 'Environmental Report') must be published for consultation alongside the draft Plan that presents information on 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.

### 1.2 The Environmental Report

1.2.1 This document comprises the Environmental Report for the Haversham-cum-Little Linford Neighbourhood Plan and must provide certain specified information, namely it must answer four questions:

- 1) What is the scope of the SEA?
  - The parameters for the SEA must be established through a scoping exercise at the outset of Plan-making
- 2) What has plan-making / SEA involved up to this point?
  - Preparation of the draft Plan must have been informed by at least one earlier Plan-making / SEA iteration. Reasonable alternatives must have been assessed.
- 3) What are the SEA findings at this stage?
  - i.e. in relation to the draft Plan.
- 4) What happens next? (including monitoring).

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<sup>1</sup> Directive 2001/42/EC

1.2.2 Each of the above questions are answered in this Environmental Report. Figure 1, below, summarises the regulatory basis for answering these questions.

Environmental Report Question		Environmental Assessment of Plans and Programmes Regulations (2004) Requirements
What is the scope of the SEA?	What is the plan seeking to achieve?	-An outline of the contents, main objectives of the Plan and relationship with other relevant plans and programmes
	What is the sustainability context?	-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 is the sustainability baseline?	-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?	-Key environmental problems/issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment
What has plan-making/SEA involved up to this point?		-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
What happens next?		-A description of the monitoring measures envisaged

Figure 1: Questions answered by the Environmental Report, in line with Regulatory requirements

## 2.0 The Scope of the SEA

### 2.0 Introduction

- 2.01 The proposal in the draft plan, which led to the requirement for an SEA, concerns the allocation of a site for housing. It is considered that a SEA is merited due to the plan's potential for likely significant environmental effects for sites with potential for remains of archaeological interest.
- 2.02 The SEA should only focus on what is needed to assess the likely significant effects of the neighbourhood plan. It does not need to be done in any more detail, or using more resources, than is considered to be appropriate for the content and level of detail in the neighbourhood plan. Consequently, the scope of the SEA is restricted to the impact of the Plan on the historic environment.
- 2.03 The scope of the SEA has been agreed through consulting with the consultation bodies, namely Natural England, the Environment Agency and Historic England.

### 2.1 What is the Plan seeking to achieve?

- 2.1.1 In order to meet the requirements of the Regulations, the Environmental Report must include an outline of the contents, main objectives of the Plan and relationship with other relevant plans and programmes. The Haversham-cum-Little Linford Neighbourhood Plan is currently being developed as a Neighbourhood Plan under the Localism Act 2012. Plan:MK was formally adopted in March 2019. Plan:MK provides the statutory land use planning framework for Milton Keynes. Policy HE1 (Heritage and Development) provides the local planning policy framework for the assessment of development proposals affecting heritage assets. It is a strategic policy to be considered when preparing neighbourhood plans.
- 2.1.2 The Haversham Community Housing Needs Survey identified a need for housing in the parish, particularly smaller, low-cost housing and housing available to meet the needs of those wishing to downsize from larger family properties. The main purpose of the HNP will therefore be to identify the most appropriate location for these new homes.
- 2.1.3 The Parish Council is aware that the adopted Plan:MK requires no further housing site allocations to be made in Haversham to 2031 but assumes that 420 rural homes will come forward as 'windfall schemes' (i.e. approved planning applications for schemes consistent with its other policies). Although Milton Keynes Council have issued a nominal housing requirement figure of 1, the Parish Council is also mindful of the provisions of §14 of the National Planning Policy Framework (NPPF) in respect of securing protection for its Plan and of the need for an early review of Plan:MK. It has therefore made housing site allocations of a total quantum that is consistent with its status as a 'Village and rural settlement' in the settlement hierarchy.

## **2.2 Vision and Objectives for the Plan**

2.2.1 The vision and objectives for the HNP were developed following consultation between the Steering Group and residents to establish what the Plan sought to achieve. The overarching vision for the Plan is as follows:

*“Haversham-cum-Little Linford remains a rural area distinct from the city of Milton Keynes. The parish has undergone some managed change to improve quality of life and access to local housing whilst preserving the rural village environment. These changes have not only avoided harm to biodiversity and connectivity but also helped create new ecological value and improved connectivity.”*

2.2.2 The Pre-submission draft Neighbourhood Plan includes the following objectives:

- To provide affordable homes for local people, particularly for those looking to downsize and young people wanting to stay in the parish;
- To encourage measures that will make the parish’s roads safer for all users;
- To ensure that important green spaces are protected from development;
- To ensure all new development respects the rural character of the area in which it takes place in terms of design, layout, materials and the surrounding landscape; and
- To maintain and improve biodiversity, connectivity and the quality of the natural environment.

## **3.0 The Sustainability Context**

### **3.0 Introduction**

3.0.1 In order to comply with the Regulations, the Environmental Report must include:

- The relevant sustainability objectives, established at international and national level; and
- Any existing sustainability problems and issues which are relevant to the Plan including, in particular, those relating to any areas/populations etc. of particular importance.

### **3.1 Historic Environment**

3.1.1 The NPPF requires that planning authorities should seek to sustain or enhance the significance of all heritage assets and that substantial harm to designated heritage assets should be wholly exceptional. It also states that archaeological remains (in particular) that are of national interest should be treated similarly. It advises that planning authorities should seek to avoid or minimise conflict between the need to conserve heritage assets (either designated or non-designated) and any aspect of a proposal under consideration.

- 3.1.2 Where development could result in harm to heritage assets that cannot be avoided (including through the development of alternative sites), it requires that this be clearly justified on the basis of public benefits that could not otherwise be delivered.
- 3.1.3 Plan:MK recognises the rich and diverse heritage context of the Borough. It seeks to ensure that all designated, and other non-designated but important assets, are conserved and where possible enhanced. Policy HE1 requires development proposals to sustain, and where possible, enhance the significance of heritage assets that are recognised as being of historic, archaeological, architectural, artistic, landscape or townscape significance.
- 3.1.4 In preparing the draft Plan, the HNP Steering Group have taken into consideration when assessing plan options and their potential impact on the historic environment the Milton Keynes Historic Environment Record (HER) as the record of non-designated heritage assets.

## 4.0 The Sustainability Baseline

### 4.0 Introduction

- 4.0.1 In order to comply with the Regulations, this report must include the following:
- The relevant aspects of the current state of the sustainability baseline and the likely evolution thereof without implementation of the Plan;
  - The characteristics of areas/populations likely to be significantly affected; and
  - Any existing sustainability problems or issues which are relevant to the Plan including, in particular, those relating to any areas or problems of particular importance.
- 4.0.2 Analysis of the baseline information enables the current and future situation in the Neighbourhood Area to be evaluated. It also enables existing problems and issues to be identified so proposals within the Neighbourhood Plan can be designed to help tackle the issues.

### 4.1 Historic Environment

#### The current situation

- 4.1.1 There are 12 listed buildings and 1 Scheduled Monument. Descriptions and the location of these designated heritage assets is included at Appendix A. There is no conservation area designation within the parish.
- 4.1.2 Undesignated actual or potential archaeological finds in the area are also of significance. The Milton Keynes Council Historic Environment Record (HER) forms a central collection of non-designated heritage assets that must be regarded in

assessing Plan options and their potential impact on the historic environment. Milton Keynes Council has identified Archaeological Notification sites where there is potential archaeological interest. Appendix B shows the extent of Archaeological Notification sites within the parish.

- 4.1.3 There are many buildings and associated locations in the Parish which are not listed or otherwise formally protected but are also considered of historic importance by the community. These non-designated heritage assets have been identified in line with Policy HE1 of Plan:MK and are listed below:
1. Land and buildings in the area surrounding Haversham Church, Haversham Manor, Old Rectory, Moat, Fishponds and Dovecote, together with land extending northwards from the church to, and beyond the old school. To cover both sides of the road down the hill to Old Haversham (southern end). The site includes two old barns between footpath 43 and the church.
  2. The Greyhound Public House and the interconnected 'Old Forge' building, including the old horse chestnut tree in front of The Greyhound.
  3. Land surrounding the site of the former old mill at Haversham, including the mill race, wharf and mill house.
  4. Land of archaeological value surrounding the ruins of St Peter's Church in Stanton Low, including site of old manor house and gardens and the former settlement of Stanton Low.
  5. Land of archaeological value surrounding Hill Farm.
  6. Land surrounding St Leonard's Church in Little Linford.
- 4.1.4 The Draft Neighbourhood Plan (policy HLL6) proposes two Local Areas of Special Character, based on these non-designated heritage assets (see Appendix C).  
The likely evolution thereof should the plan or programme not be implemented
- 4.1.5 Traffic growth has the potential to lead to effects on historic environment across the Plan area. Existing historic environment designations and Plan:MK policies will offer protection to heritage assets and their settings.



## **5.0 Appraisal of Reasonable Alternatives**

### **5.0 Introduction**

5.0.1 This section of the report outlines the likely significant effects on the environment associated with alternatives in respect of the SEA objective and an outline of the reasons for selecting the preferred option.

### **5.1 Developing the Haversham-cum-Little Linford Neighbourhood Plan**

5.1.1 Haversham Neighbourhood Plan Area was designated on 8 February 2017. Following this, consultation exercises were carried out by the Steering Group, including questionnaire surveys in June/July 2018 and December 2020.

5.1.2 The results of the two questionnaires, feedback from a Public Meeting, the Housing Needs Survey as well as the Informal Technical Assessments have been taken into account by the Steering Group as they have developed the Policies contained within the draft Neighbourhood Plan.

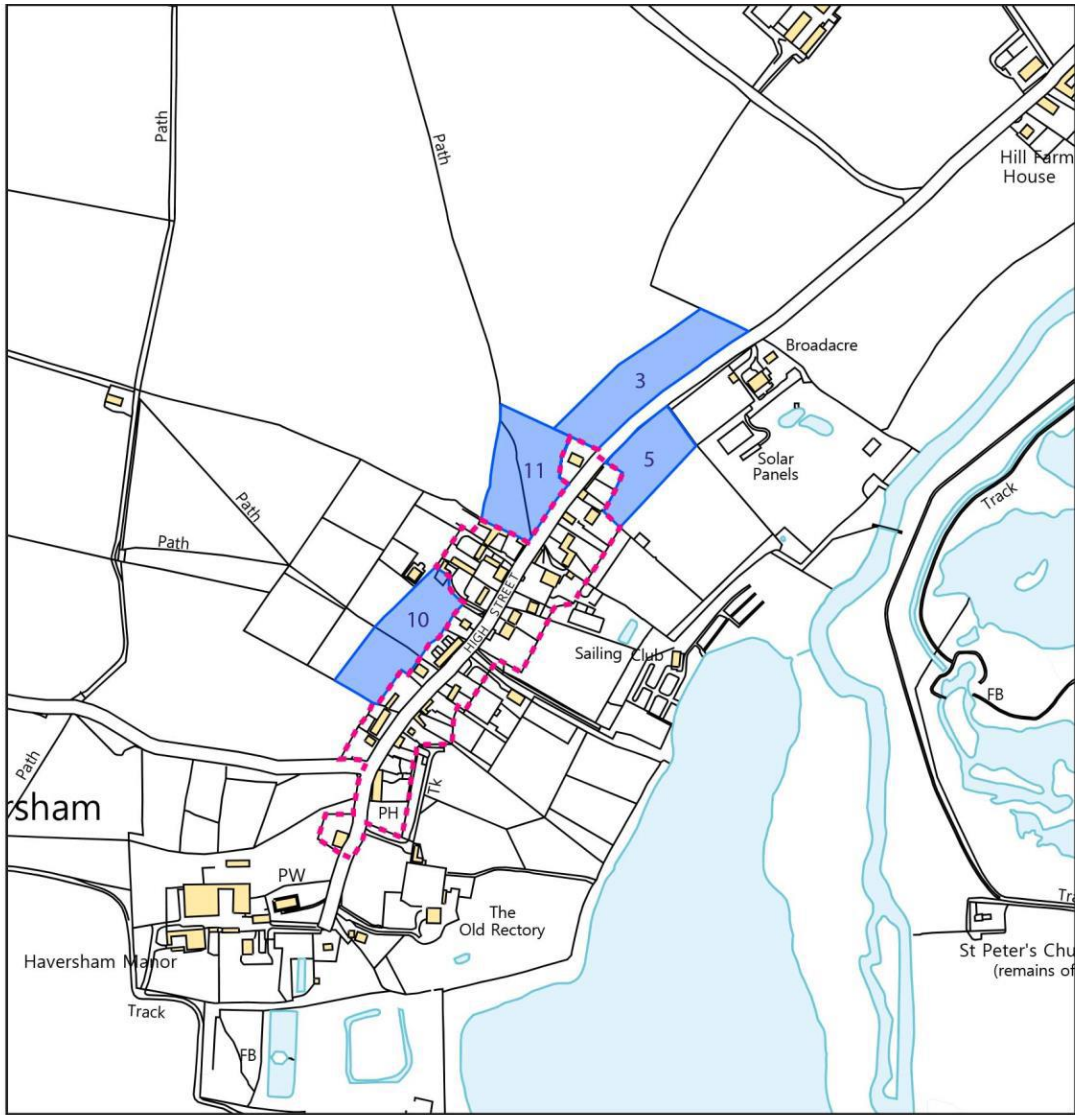
### **5.2 Identifying Reasonable Alternatives**

5.2.1 A central component of producing the Plan has been assessing potential housing sites, so that a preferred option could be selected. Whilst the Plan is not solely about housing allocations, the allocation of land for 16 new dwellings is the key element of the Plan where alternative options exist.

5.2.2 After an initial sieve, 5 sites were considered as reasonable alternatives (see Site Assessment Plans 1 and 2).

5.2.3 In line with the Regulations, the Environmental Report must include the key problems, issues and objectives that should be a focus of, or provide a framework for, appraisal. Drawing on the review of the sustainability context and baseline, the SEA Scoping Report identified the impact of allocating sites for housing on the historic environment as the key issue.

5.2.4 This issue has been translated into a sustainability objective, which provides a methodological framework for the appraisal of likely significant effects on the baseline. The SEA objective against which options for site allocations should be tested is: That heritage assets, including site of archaeological interest are conserved in a manner appropriate to their significance.



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### Haversham Neighbourhood Plan Site Assessment Plan 1: June 2020



Parish Boundary

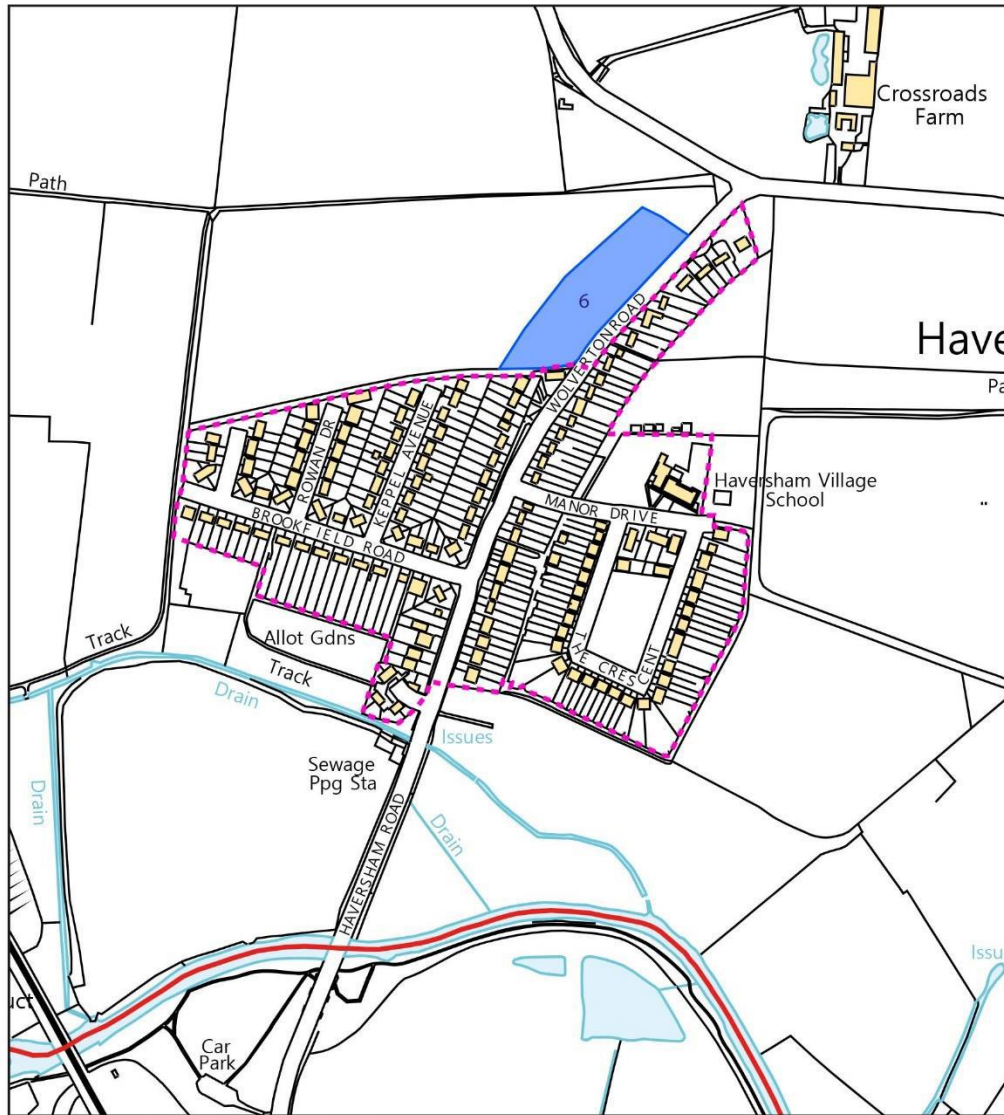


Site Boundary



Observed Settlement Boundary:  
Old Haversham

- 3. Land north of 27 High Street, Old Haversham - 1.0ha
- 5. Land east of High Street, Old Haversham - 0.9ha
- 10. Land west of High Street (nearest paddock), Old Haversham - 0.8ha
- 11. Land south of 27 High Street, Old Haversham - 1.0ha



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Haversham Neighbourhood Plan  
Site Assessment Plan 2: June 2020



5.2.5 The proposals within the neighbourhood plan can be assessed against the SEA objective above and based on the level of effect or impact as follows:

Assessment Symbol	Explanation
++	Significant positive effects
+	Positive effects, benefits clearly outweigh any disadvantages
0	Overall neutral, effects both positive and negative roughly balancing each other
-	Negative effects, disadvantages outweigh any benefits
--	Significant negative effects
N/a	Either no interaction between the policy option and assessment criteria, or the effect is not location specific

### 5.3 Summary of Reasonable Alternatives Appraisal

5.3.1 Table 1 below provides a heritage assessment of the potential housing sites:

Sites	Heritage Assessment
3. Land north of 27 High Street, Old Haversham	Evidence for Romano-British occupation in the surrounding area (Hill Farm, c.300m to the north, is the site of a possible Roman villa but finds of Roman artefacts have been made in adjacent fields also).
5. Land east of High Street, Old Haversham	Evidence for Romano-British occupation in surrounding area (Hill Farm, c.400m to the north, is the site of a possible Roman villa but finds of Roman artefacts have been made in adjacent fields also).
6. Land west of Wolverton Road, New Haversham	Distant from any designated assets or known archaeological sites.
10. Land west of High Street (nearest paddock), Old Haversham	Contains some possible earthworks seen on Lidar that may denote medieval or post-medieval village shrinkage or be the result of small-scale gravel extraction. Proximity to grade II listed Pike's Farm may be a concern due to setting.
11. Land south of 27 High Street, Old Haversham	Potential for medieval/ post-medieval frontage occupation or Romano-British occupation. Proximity to grade II listed Pike's Farm and grade II* Haversham Grange may be a concern due to setting.

**Table 1. Heritage assessment of potential housing sites**

5.3.2 This assessment indicates that without mitigation, sites 3, 5, 10 and 11 could have a negative effect as a result of potential harm to a heritage asset or its setting. Any potential impact on archaeological assets can be mitigated by requiring a pre-application archaeological assessment to be submitted. The impact of the development of site 11 on the setting of nearby listed buildings is reduced by intervening buildings. Mitigation can also be provided by requiring that proposals should respect heritage assets and their settings in the locality in accordance with their significance. Strategic Environmental Assessment allows for mitigation measures to be taken into account before assessing whether an option or policy will have a significant negative effect on the environment. Table 2 provides an assessment of potential housing sites both with and without mitigation.

Sites	Assessment (without mitigation)	Assessment (with mitigation)
3. Land north of 27 High Street, Old Haversham	-	0
5. Land east of High Street, Old Haversham	-	0
6. Land west of Wolverton Road, New Haversham	0	0
10. Land west of High Street (nearest paddock), Old Haversham	-	0
11. Land south of 27 High Street, Old Haversham	-	0

**Table 2. SEA assessment of potential housing sites**

## **5.4 Selecting the Preferred Option**

- 5.4.1 This section presents an overview of the rationale for selecting the preferred option in light of the findings of the appraisal of reasonable alternatives.
- 5.4.2 This appraisal has established that with mitigation any of the proposed options would not have a significant effect on the historic environment.
- 5.4.3 However, the preferred approach is not only determined by the SEA process. The options have also been subject to:
- An appraisal against the vision and objectives developed in consultation with local people (appendix D);
  - An appraisal of the site choices in consultation with local people;
  - An appraisal against planning policy (comprising the NPPF and policies of the Milton Keynes Council Plan:MK); and
  - Discussions with landowners and site promoters.
- 5.4.4 Appendix D provides an appraisal of the sites against sustainable development objectives and priority policy objectives (with mitigation measures). Sites 3 and 10 perform the least well, with major adverse environmental effects predicted at Site 10 due to its backland location in relation to the linear development of Old Haversham. Site 5 scored better than sites 3 and 10 but did not perform well in the community survey.
- 5.4.5 Sites 6 and 11 scored best against the technical site appraisal and in terms of community preferences. Following the community consultations, the HNP Steering Group requested sketch schemes from landowners of Site 6 and Site 11. Site 6 revised its original proposal to incorporate a larger site and confirmed that a smaller site of a size that is consistent with its status as a 'Village and rural settlement' in the settlement hierarchy was no longer available. Consequently, site 6 was removed from further consideration. Building on the appraisal findings, the HNP Steering Group viewed a number of clear advantages in selecting Site 11. As the informal assessment indicated that Site 11 can avoid or mitigate any adverse effects and it performed well in the community survey, ranking as the second preference overall, the Steering Group agreed that Site 11 most closely met the community's policy priority objectives. On this basis, Site 11 was recommended for allocation to deliver up to 16 new homes over the plan period.

## **6.0 Appraisal of the Draft Plan**

### **6.0 Introduction**

- 6.0.1 This section of the report must include:
- The likely significant effects associated with the draft plan approach; and
  - The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan approach.

## **6.1 Historic Environment**

- 6.1.1 Land south of 27 High Street, Old Haversham (site 11 in the Site Assessment) is allocated for housing in the draft Plan. It is located in close proximity to listed buildings. However, the impact of development on the setting of these buildings is reduced by intervening buildings. Draft Plan policy HLL4 requires that proposals should respect heritage assets and their settings in the locality in accordance with their significance.
- 6.1.2 Potential effects on the historic environment can be limited by policies put forward by the draft Plan. Policy HLL2 specifically seeks to ensure that the development of Site 11 would not impact archaeological assets, recommending an archaeological assessment be prepared to confirm this position.

## **6.2 Conclusions**

- 6.2.1 The preferred approach presented by the draft Plan does not lead to any significant negative effects. Any potential effects to the historic environment by the allocating of Land south of 27 High Street, Old Haversham have been mitigated in policy HLL2 by requiring a pre-application archaeological assessment.
- 6.2.2 At this stage, one recommendation is made to mitigate the adverse effects of implementing the Plan. This is:
- Include an objective within the Plan to protect the parish's historic assets, including sites of archaeological significance.

## **6.2 Next Steps**

- 6.3.1 The Submission Draft Haversham-cum-Little Linford Neighbourhood Plan (HNP), as well as this Environmental Report, will be submitted to Milton Keynes Council for its consideration under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. Milton Keynes Council will consider whether the Plan is suitable to go forward to Independent Examination in terms of the HNP meeting legal requirements and its compatibility with the Local Plan. Subject to their agreement, the Plan will then be subject to examination, whereby the Examiner will consider whether the Plan is appropriate having regard to national policy and whether it is in general conformity with the Local Plan.
- 6.3.2 The Examiner will be able to recommend that the HNP is put forward for referendum, or that it should be modified. The Council will then decide what should be done in light of the Examiner's report and invite the HNP Steering Group to make those necessary changes, which will be reflected in an updated Environmental Report.
- 6.3.3 Once adopted, the HNP will become part of the Development Plan for the area. The parish council will be consulted on planning applications submitted for the allocated housing site and will monitor proposals submitted to ensure that a pre-application archaeological assessment has been submitted in accordance with Policy HLL2.