



# Strategic Environmental Assessment (SEA) for the Neighbourhood Plan for Belper Civil Parish

Environmental Report

Non-Technical Summary

Belper Town Council

October 2019

## Quality information

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## Revision History

Revision	Revision date	Details	Authorized	Name	Position
V1	04/03/19	Draft for client review	04/03/19	Alastair Peattie	Associate Director
V2	11/03/19	Draft for public consultation	11/03/19	Alastair Peattie	Associate Director
V3	07/10/19	Draft for public consultation 're-run' (client reviewed)	08/10/19	Cheryl Beattie	Senior Environmental Planner

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# Introduction

AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Neighbourhood Plan for Belper Civil Parish (NP4B).

The NP4B is being prepared by Belper Town Council in the context of the saved policies of the 2006 Amber Valley Borough Local Plan. Once the NP4B has been 'made' it will have material weight when deciding on planning applications, alongside the latest adopted Amber Valley Borough Local Plan.

SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating negative effects and maximising the positives. SEA of the NP4B is a legal requirement.<sup>1</sup>

This is a Non-technical Summary (NTS) of the Environmental Report.

The Neighbourhood Plan is at an advanced stage of preparation, with the SEA Environmental Report, including this Non-Technical Summary accompanying the 'pre-submission' version of the Neighbourhood Plan for consultation, under Regulation 14 of the Neighbourhood Planning Regulations (2012). This report is the second iteration of the Environmental Report, following changes made to the NP4B after Regulation 14 consultation undertaken between March and May 2019. Regulation 14 consultation is being 're-run' to allow stakeholders further chance to comment on the changes made to the Neighbourhood Plan before it is submitted for Examination.

## Structure of the Environmental Report/ this NTS

SEA reporting essentially involves answering the following questions in turn:

1. What has plan-making / SEA involved up to this point?
  - i.e. preceding finalisation of proposals for consultation.
2. What are the SEA findings at this current stage?
  - i.e. in relation to the proposals published for consultation.
3. What are the next steps?

Each of these questions is answered in turn below. Firstly though there is a need to set the scene further by answering the question 'What's the scope of the SEA?'

## What's the scope of the SEA?

The scope of the SEA is reflected in a list of topics and objectives, which, taken together indicate the parameters of the SEA and provide a methodological 'framework' for assessment.

### *The SEA framework*

<b>SEA Theme</b>	<b>SEA objective</b>	<b>Assessment questions – will the option/proposal help to:</b>
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<sup>1</sup> Regulation 15 of the Neighbourhood Planning Regulations (2012, as amended) requires that each Neighbourhood Plan is submitted to the Local Authority alongside either: A) an environmental report; or, B) a statement of reasons why SEA is not required, prepared following a 'screening' process completed in accordance with Regulation 9(1) of the Environmental Assessment of Plans and Programmes Regulations ('the SEA Regulations'). The NPfB was subject to screening in 2018, including through consultation, at which time it was determined that SEA *is* required.

Biodiversity	Protect and enhance all biodiversity and geological features, and support ecological connectivity.	<p>Support/ improve the status and condition of the Belper Parks Local Nature Reserve?</p> <p>Protect and enhance areas of biodiversity value that are not locally designated or protected, such as Wyver Lane Nature Reserve?</p> <p>Protect and enhance priority habitats, and the habitats of priority species?</p> <p>Achieve a net gain in biodiversity?</p> <p>Support ecological connectivity within the Plan area and in the wider surroundings?</p> <p>Support enhancements to multifunctional green and blue<sup>2</sup> infrastructure networks?</p> <p>Support access to, interpretation and understanding of biodiversity and geodiversity?</p>
Climate Change	Reduce the level of contribution to climate change made by activities within the Neighbourhood Plan Area	<p>Increase the number of new developments meeting or exceeding sustainable design criteria?</p> <p>Reduce energy consumption from non-renewable sources?</p> <p>Generate energy from low or zero carbon sources?</p> <p>Reduce the need to travel or the number of journeys made?</p> <p>Promote the use of sustainable modes of transport, including walking, cycling and public transport?</p>
Landscape	Protect and enhance the character and quality of landscapes and townscapes within and surrounding the Neighbourhood Plan Area	<p>Conserve and enhance landscape character?</p> <p>Conserve and enhance townscape character?</p> <p>Protect and enhance key landscape features?</p>
Historic environment	Protect and enhance the rich historic environment within and surrounding the Neighbourhood Plan Area, including the Derwent Valley Mills World Heritage Site, Belper Conservation Area, further designated and non-designated	<p>Protect or enhance the integrity and special qualities of the Derwent Valley Mills World Heritage Site and its setting, and positively contribute to its ongoing conservation?</p> <p>Conserve and enhance Listed Buildings, Locally Listed Buildings, and their settings, within and surrounding the Plan area?</p> <p>Conserve and enhance the Belper Conservation Area?</p>

<sup>2</sup> Green and blue infrastructure networks include (but are not limited to); green spaces, open spaces, parks, gardens, allotments, natural areas, river corridors, waterbodies; and the links between these assets

	heritage assets and archaeological assets.	<p>Conserve and enhance local identity and distinctiveness?</p> <p>Support access to, interpretation and understanding of the historic environment?</p>
Land, soil and water resources	Ensure the efficient and effective use of land	<p>Promote the use of previously developed land?</p> <p>Avoid development of the best and most versatile agricultural land (Grades 1 to 3a)?</p>
	Use and manage water resources in a sustainable manner	<p>Support improvements to water quality?</p> <p>Minimise water consumption?</p> <p>Ensure the timely provision of wastewater infrastructure?</p> <p>Protect groundwater resources?</p>
	Promote sustainable waste management solutions that encourage the reduction, re-use and recycling of waste	<p>Limit the amount of waste produced and support the minimisation, reuse and recycling of waste?</p> <p>Encourage recycling of materials and minimise consumption of resources during construction?</p> <p>Maximise opportunities for local management of waste in order to minimise export of waste to areas outside?</p>
Population and community	Cater for existing and future residents' needs as well as the needs of different groups in the community, and improve access to local, high-quality community services and facilities.	<p>Promote the development of a range of high quality, accessible community facilities?</p> <p>Encourage and promote social cohesion and encourage active involvement of local people in community activities?</p> <p>Minimise fuel poverty?</p>
	Reduce deprivation in the most deprived areas of the Neighbourhood Plan Area, and promote inclusive and self-contained communities.	<p>Maintain or enhance the quality of life of existing local residents?</p> <p>Improve the availability and accessibility of key local facilities, including specialist services for disabled and older people?</p> <p>Support the provision of land for allotments and cemeteries?</p>
	Provide everyone with the opportunity to live in good quality, affordable housing, and ensure an appropriate mix of dwelling sizes, types and tenures.	<p>Support the provision of a range of house types and sizes, including specialist needs?</p> <p>Support the provision of affordable housing?</p> <p>Support enhancements to the current housing stock?</p> <p>Meet the needs of all sectors of the community?</p>

Provide quality and flexible 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 a range of local services and facilities?

Health and wellbeing	Improve the health and wellbeing of residents within the Neighbourhood Plan Area.	<p>Promote accessibility to a range of leisure, health and community facilities, for all age groups?</p> <p>Address the specific challenges outlined in the Joint Health and Wellbeing Strategy?</p> <p>Provide and enhance the provision of community access to green and blue infrastructure, in accordance with Accessible Natural Greenspace Standards?</p> <p>Reduce noise pollution?</p> <p>Promote healthy and active lifestyles?</p> <p>Improve access to the countryside for recreational use?</p>
Transportation	Promote sustainable transport use and reduce the need to travel	<p>Encourage a modal shift to more sustainable forms of travel?</p> <p>Enable sustainable transport infrastructure improvements?</p> <p>Facilitate working from home and remote working?</p> <p>Improve road safety?</p>

## Part 1: What has plan-making/ SEA involved to this point?

An important element of the required SEA process involves assessing 'reasonable alternatives' in time to inform development of the draft proposals, and then publishing information on reasonable alternatives for consultation alongside the draft proposals.

As such, Part 1 of the Environmental Report explains how work was undertaken to develop and assess a 'reasonable' range of alternative approaches to the allocation of land for housing, or housing growth scenarios.

Specifically, Part 1 of the report -

- 1) explains the process of establishing the reasonable alternatives;
- 2) presents the outcomes of assessing the reasonable alternatives; and
- 3) explains reasons for establishing the preferred option, in light of the assessment.

## Establishing reasonable alternatives

The main report explains how reasonable alternatives were established subsequent to process of considering the strategic policy context ('top down' factors) and the site options in contention for allocation ('bottom-up' factors).

The housing need for Belper is established through the Belper Housing Needs Assessment, which identifies an 'unconstrained' demand for an additional 957 dwellings over the period 2016 to 2028, which equates to around 80 dwellings a year.

The supply of potential sites has been considered alongside demand, with site options identified through the (withdrawn) Local Plan 'Call for Sites' and 2013 Strategic Housing Land Availability Assessment as well as the Belper Neighbourhood Plan Site Assessment Report (2017) and the Belper Brownfield Sites Viability Study (2018). Several of the sites were 'sieved out' by means of their location within the Green Belt, as these sites have recently been reviewed as part of the Green Belt Review commissioned by Amber Valley Borough Council and were subsequently not recommended for release from the Green Belt. Sites that were found within the (now withdrawn) Sustainability Appraisal of the Submission version of the Amber Valley Local Plan to have the potential for significant negative effects on the landscape/ townscape and the historic environment were also 'sieved out' as they were not considered to be reasonable options. The findings of this work are still considered relevant to the NP4B.

All but one of the remaining potential site options were brownfield sites, and all of the remaining sites are located within the settlement boundary.

Considering the above (and the finer detail provided in the Environmental Report), two reasonable options or growth scenarios were established:

**Option 1:** a wholly brownfield approach – allocating only those sites which are brownfield and located within the existing settlement area, relying on the newly emerging Local Plan and/ or windfall development to meet the outstanding need and/ or modifying density levels to achieve more dwellings within key sites (North and East Mills, West Mill and Dalton/ Fuchs Warehouse and Stable Block).

**Option 2:** a 'brownfield-first' approach, but also including 28, The Fleet (a greenfield site), to support meeting the remaining needs and reduce risk associated with the viability/ development interest of some of the brownfield sites.

To clarify the sites being considered under each of the options are identified below;

- **Option 1:**
  - Ada Belfield Care Home;
  - Babington Hospital;
  - Belper Library;
  - Milford Mill;
  - North Derwent Street;
  - North and East Mills;
  - West Mill; and
  - Dalton/ Fuchs Warehouse and Stable Block.
- **Option 2:**
  - All of the sites listed under Option 1; and
  - 28, The Fleet.

## Assessing reasonable alternatives

Summary alternatives assessment findings are presented within the table below. Within each row (i.e. for each of the topics that comprise the SA framework) the columns to the right hand side seek to **both** categorise the performance of each option in terms of ‘significant effects’ (using **red** / **green**) **and** also rank the alternatives in relative order of performance.

SEA Topic	Option 1	Option 2
Biodiversity	1	2
Climate change	1	2
Landscape	1	2
Historic environment	1	2
Land, soil and water resources	1	2
Population and community	2	1
Health and wellbeing	1	2
Transportation	1	2

### Summary Findings:

Overall the assessment of the reasonable alternative options has identified that on the whole Option 1 performs better in terms of sustainability than Option 2. This is predominantly as a result of the development of greenfield land proposed under Option 2 which has greater potential to negatively affect the SEA topics of biodiversity, landscape, the historic environment, and land, soil and water resources. The slightly higher level of development proposed under Option 2 is also considered to have greater potential for negative effects associated with transport and climate change given the anticipated slightly higher levels of private car ownership overall – though it is recognised that the difference of 20 dwellings between the options is relatively negligible.

Neither option will meet the identified housing need for Belper in full and as such, both options are considered to have the potential for minor negative effects with regards to population and communities, and this is considered to be at a greater extent in Option 1 given that it is the lower growth option.

It is also noted that there are concerns around achieving suitable access at the site at ‘28, The Fleet’, and these concerns will need to be appropriately addressed prior to any development at the site to avoid negative effects associated with the SEA topics of health and wellbeing, and transportation.

The key findings from the assessment relate to the SEA topics of landscape and the historic environment. Both options contain brownfield sites, the redevelopment/regeneration of which has the potential to significantly positively affect the townscape, historic environment and tourism economy. However, the addition of greenfield development under Option 2 facilitates the potential for minor negative effects on townscape and historic environment, and as such Option 1 is identified as the preferred option in relation to these SEA topics.

No significant negative effects as a result of the growth strategy for Belper are anticipated at this stage and the main recommendations arising for plan-making include:

- Policy provisions that seek to embed a biodiversity net gain principle in development, to support the delivery of positive effects for biodiversity.

## SEA Topic

## Option 1 Option 2

- The plan seeks to identify design principles and/ or a master-plan approach to the development of the sites, to support the overall delivery of positive effects for the townscape and historic environment.
- Key local views into and out of sites, to or from the surrounding countryside or townscape are identified and protected in development.
- Non-designated heritage assets and their settings are identified and provided with additional protections through the NP4B policies.
- Policy provisions require the use of Sustainable Drainage Systems in development.
- Measures taken to improve viability at some of the sites avoid minimising Affordable Housing contributions and favour alternative solutions (such as increased densities) wherever possible, to reduce the potential for negative effects for the resident population and lower income communities.
- Further investigation in terms of achieving satisfactory access at the site at '28, The Fleet' is completed prior to any further progression of the site.

## Establishing the preferred option

The following is the Town Council's response to the assessment of reasonable alternative housing growth scenarios presented above:

*"The preferred option is Option 1, which accords fully with the alternatives assessment findings and reflects the aspirations of local people to achieve a brownfield development strategy.*

*It is recognised that this brownfield strategy is a preferential approach for future development and is intended to compliment/ site alongside the Local Plan strategy. As such, whilst the development strategy outlined by the NP4B does not meet the indicative figures for housing need in full, it demonstrates a preferred approach for the majority of future housing growth and is broadly aligned. The nature of the HNA – that it is an unconstrained figure (see footnote 10) – should also be taken into consideration. In an area that has significant landscape sensitivities (world heritage site, buffer zone and greenbelt) it would be reasonable to expect that site allocations may not be able to deliver an unconstrained HNA figure.*

*It is expected that higher densities can be achieved at 4 of the proposed allocation sites (North and East Mills, West Mill, North Derwent Street, and Dalton/ Fuchs Warehouse and Stable Block) during the detailed planning application stage, and this is likely to support an increase in overall housing provisions.*

*It is also expected that this brownfield strategy will be complimented by further growth as a result of infill development, which could include the site at '28, The Fleet' if the issues associated with the site can be overcome at the planning application stage. It is also considered likely that infill development will meet any remaining needs that the brownfield strategy may fall shy of.*

*It is also recognised that further growth as a result of Local Plan allocations could also increase development levels in Belper, to an extent that is likely to meet or exceed the identified needs.*

*After April 2019, AVBC have now included the Abru site for 136 homes and Lander Lane for 13 homes as part of the Borough housing land supply. The sites have been cleared but not yet built out."*

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

Part 2 of the Environmental Report presents an assessment of the Pre-Submission version of the NP4B. Assessment findings are presented as a series of narratives under the 'SEA framework' topic headings. The following overall conclusion is reached:

The NP4B performs relatively well overall against the SEA themes, benefitting the local community through supporting the delivery of housing and mixed-use development on brownfield and regeneration sites throughout the Town. The NP4B seeks to strike a balance between the needs of conservation, biodiversity, access, the interests of the local community, the public benefits of a development and the sustainable economic use of the WHS in its setting. To this effect, positive effects are concluded in relation to the majority of SEA topics.

It is recognised that the NP4B is relatively limited in the potential to improve local transport infrastructure through new development; however, supporting opportunities to improve the pedestrian and cycle network through the site allocations, is considered likely to lead to positive effects for both the transportation and health and wellbeing SEA topics.

The NP4B takes a proactive approach to new development and regeneration of the town, prioritising brownfield sites, leading to positive effects in relation to the population and community and land, soil and water SEA objectives. The NP4B supports new development in a way that integrates with the existing heritage, landscape and architecture and reinforces the unique characteristics of the area.

The NP4B capitalises on distinct opportunities to improve the townscape and tourism appeal of a highly valued environment. In particular, the support for the restoration and regeneration of the North and East Mills could potentially see significant and prominent vacant Listed Buildings be bought back into use, with potential long-term significant positive effects with regards to townscape, the historic environment, and the tourist economy.

The previous Environmental Report accompanying the Regulation 14 'Pre-Submission Plan identified two recommendations in relating to strengthening policy protection for mature trees, hedgerows and vegetation and for Sustainable Drainage Systems. Both of these recommendations were addressed in plan amendments and no further recommendations are made.

## Part 3: What are the next steps?

Part 3 of the Environmental Report answers the question – What happens next? – by discussing plan finalisation and monitoring.

### Plan finalisation

This Environmental Report accompanies the Pre-Submission version of the Neighbourhood Plan for Belper Civil Parish for a 're-run' of Regulation 14 consultation.

Following consultation, any representations made will be considered by Belper Town Council, and the Neighbourhood Plan and accompanying Environmental Report will be updated as necessary. The updated Environmental Report will then accompany the Neighbourhood Plan for submission to the Local Planning Authority, Amber Valley Borough Council, 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 and emerging Amber Valley Borough Local Planning Framework.

If the subsequent Independent Examination is favourable, the Neighbourhood Plan for Belper Civil Parish will be subject to a referendum, organised by Amber Valley Borough Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once made, the Neighbourhood Plan will become part of the Development Plan for Amber Valley, 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 Neighbourhood Plan 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 Amber Valley Borough Council 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 review and monitoring.

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