



**Strategic Environmental Assessment
Screening Determination Statement
for
Knebworth Neighbourhood Plan**

1. Introduction

- 1.1 This report sets out a Screening Determination for the Knebworth Neighbourhood Plan, and has been prepared by North Hertfordshire District Council with input from the Knebworth Parish Council. The purpose of the screening is to assess if the Neighbourhood Plan will require a Strategic Environmental Assessment (SEA). More detail is given in the following sections on SEA (section 2), Neighbourhood Plans (section 3) and the Knebworth Neighbourhood Plan specifically (section 4).
- 1.2 The assessment of the Knebworth Neighbourhood Plan and the Determination is included in sections 5, 6 and 7.

2. Strategic Environmental Assessment Context

- 2.1. European Union Directive 200142/EC requires an SEA to be undertaken for certain types of plans or programmes that could have significant environmental effects. The Directive has been transposed into law for England and Wales in the Environmental Assessment of Plans and Programmes Regulations 2004 (the Regulations). The purpose of Strategic Environmental Assessment is to promote sustainable development through assessing the extent to which the plan will help to achieve relevant environmental, economic and social objectives.
- 2.2. Under Regulation 9 of the Regulations, the responsible body (local parish or town council or neighbourhood forum) is required to determine whether a plan or programme is likely to have significant environmental effects, and therefore whether an SEA is required. This process is called screening, and is undertaken using a specified set of criteria (set out in Schedule 1 of the Regulations). The Regulations require that the results of this process are set out in an SEA Screening Determination (this document), which must be publicly available. This document should be submitted with the Neighbourhood Plan proposal and made available to the independent examiner.
- 2.3. Before the responsible body makes a formal determination, there is a requirement to consult three statutory consultation bodies designated in the Regulations (Historic England, the Environment Agency & Natural England) on whether an environmental assessment is required. Consultation took place between 14 September and 26 October 2020 and responses were received from each of the three statutory consultees.

3. Neighbourhood Plans and Strategic Environmental Assessment

- 3.1. Planning Practice Guidance states that *“to decide whether a draft Neighbourhood Plan might have significant environmental effects, it must be assessed (screened) at an early stage of the plan’s preparation according to the requirements set out in*

Regulation 9 of the Environmental Assessment of Plans and Programmes Regulations 2004”¹.

3.2. The Guidance also suggests that *the “The local planning authority, as part of its duty to advise or assist, should consider putting in place processes to determine whether the proposed Neighbourhood Plan will require a strategic environmental assessment”².* In this case North Hertfordshire District Council (NHDC) is providing assistance by undertaking the screening determination.

3.3. The Guidance notes particular circumstances which may require a SEA³:

“A strategic environmental assessment may be required, for example, where:

- *a Neighbourhood Plan allocates sites for development*
- *the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan*
- *the Neighbourhood Plan is likely to have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan”.*

3.4. This Screening Determination has taken account of the Guidance in reaching its conclusions, and it notes that the particular circumstances described above are encompassed by the criteria outlined in Schedule 1 of the Regulations.

4. Knebworth Neighbourhood Plan

4.1. Knebworth is a parish comprised of a principal village of around 2,500 dwellings and several outlying settlements. It is completely surrounded by green belt. At the beginning of the 20th century, a plan was devised for the development of a ‘garden village’ at Knebworth, along the lines of the Garden City at Letchworth which had started in 1903. An estate of 800 acres was laid out, but the plan never totally materialised. However, there are excellent examples of Lutyens architecture, in particular, Knebworth House, and spacious layouts of homes around public greens, showing the influence of the Lutyens Garden Village concept.

4.2. The Parish is rich in natural and built heritage. There are 54 listed buildings, two conservation areas and several non-listed heritage assets identified in the Neighbourhood Plan. The land surrounding Knebworth House includes a range of nationally important and declining habitats, rare plants and its ancient woodland is a SSSI. There are six areas of Ancient Woodland and 20 Local Wildlife Sites.

4.3. The vision for the Neighbourhood Plan takes into account the need for growth whilst maintaining the character of Knebworth and minimising the impact on the environment:

¹ Paragraph: 028 Reference ID: 11-028-20150209

² ibid

³ Paragraph: 046 Reference ID: 11-046-20150209

Knebworth aims to be a vibrant and inclusive village community, a great place to live that is distinct and separate from its neighbouring communities. A place that aspires to good design and improved environmental performance where everybody has access to green spaces. A community that will accommodate sustainable growth and development in its population, services and infrastructure that embraces our values, has the minimum impact on local nature and wildlife and that ensures Knebworth's fundamental rural character is maintained.

4.4 The Neighbourhood Plan's objectives are to:

- A. Maintain the distinctiveness and separation of Knebworth from nearby towns and villages
- B. Support existing employment locations within the built-up area and encourage new employment opportunities throughout the parish
- C. Encourage and support a diverse range of retail and service uses in the village centre, retain and protect the 'high street' retail frontage and retain the two public houses
- D. Encourage the provision of suitable buildings for small scale businesses (including community shops) within new residential developments
- E. Encourage the growth of home-based businesses including the provision of shared workspaces
- F. Ensure all new developments are inclusive and accommodating to the different needs of local residents including affordability and accessibility
- G. Promote best practice in environmental performance of all construction projects to achieve low energy usage, incorporate renewable energy initiatives, conserve water, re-use building materials, provide electric car charging points and ensure all new buildings are carbon-neutral
- H. Require all new development to be of high-quality design and contribute towards Knebworth's character by being sympathetic to design of surrounding areas
- I. Retain the existing architectural character of the Garden Village, conservation areas and other heritage assets
- J. Create attractive, easily accessible safe neighbourhoods through good design following the principles of 'Placemaking'
- K. Seek cost effective and innovative solutions (underground parking in major developments) to minimise the amount of land taken up with car parking
- L. Ensure that all current and future amenities, medical facilities and service provision are inclusive, easily accessible and do not diminish in terms of quantity and quality to serve the growing population
- M. Protect, enhance and increase accessibility to, and the number of, green spaces for recreational and health use

- N. Identify options for provision of a community information space
- O. Ensure future school and pre-school provision meets local needs, is high quality, offers choice, and includes appropriate accommodation, adequate facilities and safe and convenient access routes
- P. Find a solution to the 'high street' traffic and parking problems
- Q. Negotiate for the provision of disabled access to rail station platforms
- R. Support and encourage use of sustainable modes of transport including ensuring access roads through new developments are suitable for bus routes
- S. Provide guidance on eliminating air, light, soil, water and noise pollution
- T. Lobby appropriate bodies to undertake required improvements to eliminate current flooding problems and ensure new development is designed to prevent future flooding issues
- U. Protect key views and character areas from the negative impact of new development
- V. Preserve existing and design integral wildlife corridors and habitats into new developments to improve biodiversity, reducing public lighting to the minimum needed to ensure residents' safety where light pollution impacts wildlife

4.4. The Neighbourhood Plan does not contain any housing or mixed-use development site allocations. It does however contain detailed policies that would guide the development of those sites proposed for housing and a school in the North Herts Local Plan, which is currently being examined. The Plan does contain policies on sustainable development and transport, design, pollution, and both the built and natural environment

4.5. The Neighbourhood Plan has been produced by the Knebworth Parish Council.

5. Screening Assessment

5.1. As noted above, the Regulations specify a set of criteria which must be used to assess whether any plan covered by the Regulation is likely to have a significant environmental effect and therefore require a SEA. The table below considers each of these criteria in turn.

Table 1 : Assessment of likelihood of significant effects on the environment

Criteria for determining the likely significance of effects	Likely to have	Justification for assessment
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	significant effects?	
1 (a) the degree to which the plan or programme sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources	No	The framework for development in Knebworth is currently set by the NPPF and the saved policies of the existing North Hertfordshire Local Plan and the NPPF. A new Local Plan is currently being prepared, with adoption timetabled for 2020/1. Knebworth Neighbourhood Plan does not include site allocations or provide for any other projects which are likely to have significant effects. A wish list of projects can be found in the Action Plan at Appendix D. These projects aim to increase the ease with which residents can travel by sustainable means in Knebworth.
1 (b) the degree to which the plan or programme influences other plans or programmes including those in a hierarchy.	No	A Neighbourhood Plan is at the bottom of the planning hierarchy and must be in general conformity with the strategic policies of the Local Plan
1 (c) the relevance of the plan or programme for the integration of environmental considerations in particular with a view to promoting sustainable development	No	The Neighbourhood Plan focuses on protecting the quality of the neighbourhood and its environment, particularly in the case of any development which arises out of the existing planning framework or the emerging new Local Plan. The emerging Local plan has been subject to sustainability appraisal at all stages, and the outcomes of those assessments have been considered with regard to this Neighbourhood Plan. It is considered that the Neighbourhood Plan's likely impact will be to have a positive effect on the environment by providing an additional layer of policy protection.
1(d) environmental problems relevant to the plan	No	None have been identified.
1 (e) the relevance of the plan or programme for the	No	The Plan will be in conformity with the saved Local Plan Polices, the NPPF and

implementation of community legislation on the environment (e.g. plans and programmes linked to waste management or water protection)		the emerging Local Plan which have taken account of existing legislation for environmental protection. As noted above it is likely to have a positive effect by improving environmental protection policies.
2 (a) the probability, duration, frequency and reversibility of the effects	No	No significant effects have been identified
2 (b) the cumulative nature of the effects	No	No significant effects have been identified
2 (c) the trans-boundary nature of the effects	No	No significant effects have been identified
2 (d) the risks to human health or the environment (e.g. due to accidents)	No	No significant effects have been identified
2 (e) the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	No	No significant effects have been identified
2 (f) the value and vulnerability of the area likely to be affected due to: (i) special natural characteristics or cultural heritage (ii) exceeded environmental quality standards (iii) intensive land-use	No	The neighbourhood area does contain sensitive features, as noted above, but there are no proposals in the Plan which are likely to have significant environmental effects on these features. In fact, key Plan policies are designed to protect these features. The following specific policies protect heritage assets, the environment and design of development: Policy KBBE2 Sustainable buildings Policy KBBE4 Design Policy KBBE5 Masterplanning and Placemaking Policy KBBE6 Site KB1 Land at Deard's End Policy KBBE7 Site KB2 Land off Gipsy Lane Policy KBBE8 Site KB4 Land east of Knebworth

		<p>Policy KBW2 Local Green Spaces Policy KBW3 Recreational Green Spaces Policy KBW5 Allotments Policy KBEF1 Biodiversity Policy KBEF2 Environmental Pollution Policy KBEF3 Energy conservation Policy KBEF4 Flooding and Drainage Policy KBEF5 Views and Character Areas Policy KBEF6 Non-designated Heritage Assets Policy KBT1 Sustainable Modes of Travel</p>
2 (g) the effects on areas or landscapes which have a recognised national, community or international protection status	No	<p>Knebworth Woods SSSI is within the Neighbourhood Plan area. Policy KBEF1 seeks to improve biodiversity in national and local natural heritage areas. Local Green Space designations will be made for five green area including the only allotments spaces in the Parish and the formal Recreation Grounds which are the most important green space in Knebworth. In addition to recognition of built heritage, Policy KBEF5 lists and protects important views outside the conservation areas (which are noted in the conservation area appraisals) and also designates two special character areas which reflect the early develop of Knebworth in the style of a 'Garden Village'.</p> <p>These effects are likely to be positive. The Habitats Regulation Assessment screening report produced by NHDC in February 2013 concluded that in combination, there is not likely to be any significant combined impact on European sites from any plans or projects developed for the District.</p>

6. Consultation Responses

- 6.1. The Council have consulted the three statutory consultation bodies designated in the Regulations (English Heritage, the Environment Agency & Natural England) on whether an environmental assessment is required. Responses were received from all three statutory consultees. The three agencies have agreed with the draft screening report that a SEA is not required. A copy of the responses are attached as Appendices 2, 3 and 4.

7. Screening Determination

- 7.1. In summary, it is concluded that at this time the Knebworth Neighbourhood Plan is not likely to have significant environmental effects and therefore a SEA is not required. The principal reasons for this conclusion are that:

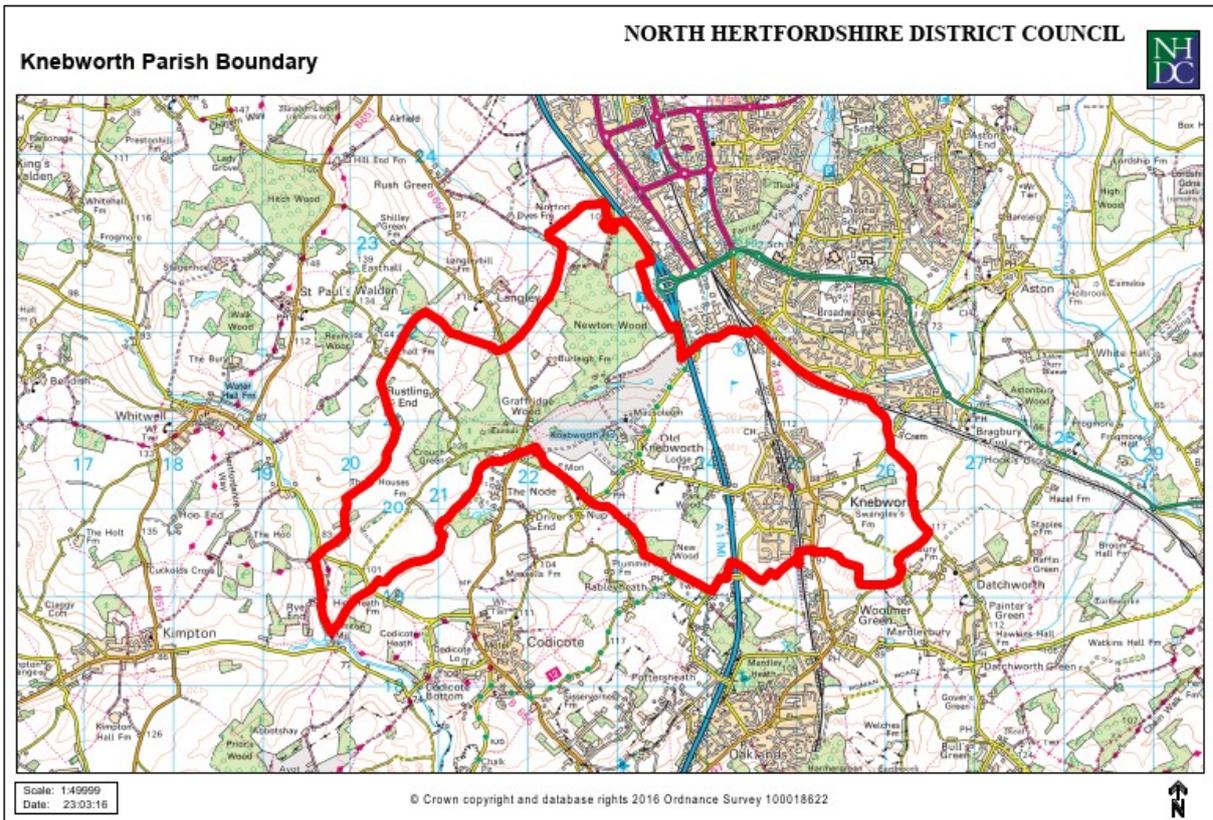
- No sites are allocated for development in the neighbourhood plan;
- The Plan focuses on additional safeguards to help mitigate potential environmental impacts of the development proposed in the Local Plan and to ensure new development is of high quality. To the extent that the neighbourhood plan will have environmental effects in its own right, they are unlikely to be significant, and are anticipated to have a positive effect by providing an additional layer of protection.
- While the neighbourhood area does contain sensitive features, for example Knebworth Woods SSSI as noted above, there are no proposals in the neighbourhood plan which are likely to have significant environmental effects on them. In fact, as already noted, key plan policies are designed to provide additional protection for these features.

- 7.2. This screening determination will be reviewed when the Regulation 16 version of the Knebworth Neighbourhood Plan is prepared.

8. Appendices

- 8.1. Appendix 1 – Map of the Neighbourhood Plan Area
8.2. Appendix 2 – Response from Natural England
8.3. Appendix 3 – Response from Historic England
8.4. Appendix 4 – Response from the Environment Agency

Appendix 1 – Map of the Neighbourhood Plan Area



Appendix 2 – Response from Natural England

Date: 16 September 2020
Our ref: 327857
Your ref: Knebworth Neighbourhood Plan - SEA Screening



Clare Skeels
North Hertfordshire District Council
Clare.Skeels@north-herts.gov.uk

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Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

BY EMAIL ONLY

T 0300 060 3900

Dear Ms Skeels,

Knebworth Neighbourhood Plan - SEA Screening

Thank you for your consultation on the above dated 14 September 2020 which was received by Natural England on 14 September 2020

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Screening Request: Strategic Environmental Assessment

It is our advice, on the basis of the material supplied with the consultation, that, in so far as our strategic environmental interests (including but not limited to statutory designated sites, landscapes and protected species, geology and soils) are concerned, that there are unlikely to be significant environmental effects from the proposed plan.

Neighbourhood Plan

Guidance on the assessment of Neighbourhood Plans, in light of the Environmental Assessment of Plans and Programmes Regulations 2004 (as amended), is contained within the [National Planning Practice Guidance](#). The guidance highlights three triggers that may require the production of an SEA, for instance where:

- a neighbourhood plan allocates sites for development
- the neighbourhood area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
- the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the Local Plan.

We have checked our records and based on the information provided, we can confirm that in our view the proposals contained within the plan will not have significant effects on sensitive sites that Natural England has a statutory duty to protect.

We are not aware of significant populations of protected species which are likely to be affected by the policies / proposals within the plan. It remains the case, however, that the responsible authority should provide information supporting this screening decision, sufficient to assess whether protected species are likely to be affected.

Notwithstanding this advice, Natural England does not routinely maintain locally specific data on all potential environmental assets. As a result the responsible authority should raise environmental issues that we have not identified on local or national biodiversity action plan species and/or habitats, local wildlife sites or local landscape character, with its own ecological and/or landscape advisers, local record centre, recording society or wildlife body on the local landscape and biodiversity receptors that may be affected by this plan, before determining whether an SA/SEA is necessary.

Please note that Natural England reserves the right to provide further comments on the environmental assessment of the plan beyond this SEA/SA screening stage, should the responsible authority seek our views on the scoping or environmental report stages. This includes any third party appeal against any screening decision you may make.

For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely,

Ben Jones
Consultations Team

Appendix 3 – Response from Historic England

RE: Knebworth Neighbourhood Plan - SEA Screening



James, Edward <Edward.James@HistoricEngland.org.uk>

To Clare Skeels

Knebworth



Wed 21/10/2020 12:33

Thank you for inviting Historic England to comment on this consultation. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore we welcome this opportunity to review the Screening Report for this plan. For the purposes of this consultation, Historic England will confine its advice to the question, "Is it (the Knebworth Neighbourhood Plan) likely to have a significant effect on the historic environment?". Our comments are based on the information supplied with the Screening Opinion.

The Screening Report indicates that the Knebworth Parish Council considers that the plan will not have any significant effects on the historic environment. We note that the plan does not propose to allocate any sites for development.

On the basis of the information supplied, and in the context of the criteria set out in Schedule 1 of the Environmental Assessment Regulations [Annex II of 'SEA' Directive], Historic England concurs with the Council that the preparation of a Strategic Environmental Assessment is not required.

The views of the other two statutory consultation bodies should be taken into account before the overall decision on the need for an SEA is made.

I should be pleased if you can send a copy of the determination as required by REG 11 of the Environmental Assessment of Plans and Programmes Regulations 2004.

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

Historic England strongly advises that the conservation and archaeological staff of the relevant local authorities are closely involved throughout the preparation of the plan and its assessment. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the Historic Environment Record (HER), how the allocation, policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

Please do contact me, either via email or the number below, if you have any queries.

Kind regards,

Edward

Edward James
Historic Places Adviser - East of England
Historic England

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Appendix 4 – Response from the Environment Agency

RE: Re: 200916/ND12 Knebworth Neighbourhood Plan - SEA Screening



HNL Sustainable Places <HNL.SustainablePlaces@environment-agency.gov.uk>
To Clare Skeels

Knebworth

Reply Reply All Forward

Mon 19/10/2020 12:20

Dear Clare

Thank you for consulting the Environment Agency on the screening opinion/draft SEA screening report for the Knebworth Neighbourhood Plan. We are a statutory consultee in the SEA process and aim to reduce flood risk and protect and enhance the water environment. Based on our review of the draft plan, we think there are potential significant environmental effects that relate to the Neighbourhood Plan area. However, please note that if the Local Plan's Sustainability Appraisal has already appraised the risks associated with these constraints in this area, an SEA covering these risks may not be necessary.

We have identified that the neighbourhood plan area will be affected by the following environmental constraints:

SPZs/Aquifers

The plan includes areas which are located on aquifers and Source Protection Zones. These should be considered within the plan if growth or development is proposed here. The relevance of the designation and the potential implication upon development proposals should be considered with reference to our Groundwater Protection guidance: <https://www.gov.uk/government/collections/groundwater-protection>

We encourage Neighbourhood Plan makers to seek ways in which a neighbourhood plan can improve the local environment. For your information, together with Natural England, English Heritage and Forestry Commission we have published joint guidance on neighbourhood planning, which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: <https://neighbourhoodplanning.org/toolkits-and-guidance/consider-environment-neighbourhood-plans/>

I hope you find this useful. Please let me know if you have any questions.

Kind regards
Deborah

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Does Your Proposal Have Environmental Issues or Opportunities? Speak To Us Early!

If you're planning a new development, we want to work with you to make the process as smooth as possible. We offer a bespoke advice service where you will be assigned a project manager who will be a single point of contact for you at the EA, giving you detailed specialist advice. This early engagement can significantly reduce uncertainty and delays to your project. More information can be found on our website [here](#).

	For the latest guidance: - INTRANET.EA.GOV - NHS.UK/coronavirus - GOV.UK/coronavirus	
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