

Strategic Environmental Assessment (SEA) for the Shepton Mallet Neighbourhood Plan

SEA Environmental Report

April 2023

Quality information

Prepared by	Checked by	Verified by	Approved by
EB; Graduate Environmental Planner	CB; Principal Environmental Planner	NCB; Technical Director	NCB; Technical Director
EH: Environmental Planner			

Revision History

Revision	Revision date	Details	Name	Position
V1	06 April 2023	Working draft for internal review	EB	Graduate Environmental Planner
V2	25 April 2023	Full draft for QB review	RT	NP Steering Group
V3	28 April 2023	Publication draft	CB	Principal Environmental Planner

Prepared for:

Shepton Mallet Town Council

Prepared by:

AECOM Limited
 3rd Floor, Portwall Place
 Portwall Lane
 Bristol BS1 6NA
 United Kingdom

aecom.com

© 2023 AECOM Limited. All Rights Reserved.

This document has been prepared by AECOM Limited (“AECOM”) for sole use of Locality (the “Client”) in accordance with generally accepted consultancy principles, the budget for fees and the terms of reference agreed between AECOM and the Client. Any information provided by third parties and referred to herein has not been checked or verified by AECOM, unless otherwise expressly stated in the document. No third party may rely upon this document without the prior and express written agreement of AECOM.

Table of Contents

Non-Technical Summary (NTS).....	i-viii
1. Introduction	1
2. What is the plan seeking to achieve?	2
3. What is the scope of the SEA?	6
Part 1: What has plan-making / SEA involved to this point?	
4. Introduction (to Part 1)	8
5. Establishing reasonable alternatives	9
6. Assessing reasonable alternatives	14
7. Developing the preferred approach	22
Part 2: What are the SEA findings at this stage?	
8. Introduction (to Part 2)	24
9. Assessment of the draft plan.....	26
10. Conclusions and recommendations	36
Part 3: What are the next steps?	
11. Next steps	38
Appendix A Regulatory requirements.....	39
Appendix B Scoping information	43

Non-Technical Summary (NTS)

Introduction

AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Shepton Mallet Neighbourhood Plan (SMNP).

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 positive effects. SEA of the SMNP is a legal requirement.¹ This is a Non-Technical Summary (NTS) of the SEA Environmental Report.

The SMNP is being prepared in the context of the adopted Mendip Local Plan Parts 1 and 2. Once 'made' the SMNP will have material weight when deciding on planning applications, alongside the Local Plan.

The SMNP SEA Environmental Report (and this NTS) is being published alongside the 'pre-submission' version of the Plan, under Regulation 14 of the Neighbourhood Planning Regulations (2012, as amended).

Structure of the Environmental Report/ this NTS

SEA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 ('the SEA Regulations'). In creating a structured approach, SEA reporting essentially involves answering the following questions in turn:

1. What has plan-making / SEA involved up to this point?
 - i.e., in relation to exploring and appraising 'reasonable alternatives' (as prescribed by the SEA Regulations²).
2. What are the SEA findings at this stage?
 - i.e., in relation to the draft plan that is being consulted on.
3. What happens next?

Each of these questions is answered in turn within a discrete 'part' of the Environmental Report (Part 1, Part 2, and Part 3) and summarised within this NTS. However, the scene is first set by answering the questions 'What is the Plan seeking to achieve?' and 'What's the scope of the SEA?'

¹ 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 SMNP was subject to screening in 2022 which determined SEA is required.

² The SEA Regulations are not prescriptive as to what constitutes reasonable alternatives but identifies that a report (known as the Environmental Report) must be published for consultation alongside the draft plan that "*identifies, describes, and evaluates*" the likely significant effects of implementing "*the plan, and reasonable alternatives*" considering the plan objectives and geographical scope.

What is the Plan seeking to achieve?

The SMNP has identified the following vision:

“In 2036, Shepton Mallet is still a pleasant place to live. It has grown considerably in size, but good planning, which has taken account of the concerns and policies included in the Neighbourhood Plan, has meant that its character as one of Somerset’s historic small market towns has been firmly established.

Shepton Mallet has effectively addressed its key issue of the town centre. It has successfully regenerated the town centre which now boasts a range of independent shops and businesses, and Shepton Mallet has become the “Food and Drink” destination of this area of the Southwest. In particular, the area of the High Street North and Market Place has been developed and has become the retail centre of the town with tourism as its main attraction.

Secondly, there have been great improvement in traffic management and pedestrian safety. The improvements to bus service infrastructure and the development of walkways and cycle paths into and around the town centre have encouraged people to leave their cars at home. This has reduced congestion and the pressure on the town’s car parks, and so has improved the town centre as a place to stop and walk around, and its shops and businesses are thriving in both daytime and evening. This has led to increasing job opportunities for local people.

The protection of the character of the town centre, including the actions taken with regard to former derelict and empty shops and buildings, has led to an increase in the number of visitors and tourists coming to the town.

Access to the countryside and its many walking and cycling routes is easy, and visitors and residents are enjoying the high-quality environment and leisure activities. The environment has been protected with a number of Local Green Spaces being allocated, and our biodiversity has been enhanced.

Better health and leisure facilities have been developed, and those green spaces listed in the Neighbourhood Plan because of their recreational and informal leisure value, have been retained and improved to meet the needs of all sections of the population. In addition, new green spaces have been provided as part of recent housing developments.

Some small-scale housing development has taken place on infill sites, but in accordance with the policies in the Plan it has matched the size, scale, and character of the existing built environment and has met local housing needs. This has meant that neither younger nor older people need now to move away to find affordable or suitable housing.

A strong community spirit continues to exist, and new residents have successfully integrated into the town, and this has given everyone the opportunity to participate in and live a healthy, safe, and satisfying life.”

To support this vision, 28 objectives have been identified, and categorised under the five themes of housing and built environment, transport, town centre and economy, environment, and health, recreation and community (see pages 4 and 5 of the main Environmental Report for a full list of SMNP objectives).

What is the scope of the SEA?

The scope of the SEA is reflected in a list of themes and objectives, which, taken together indicate the parameters of the SEA and provide a methodological 'framework' for assessment. The SEA framework for the SMNP is provided below. The preferred approach of the plan, alongside reasonable alternatives are appraised in relation to each of the objectives identified through scoping.

SEA topic	SEA objective
Biodiversity and geodiversity	Protect and enhance biodiversity and geodiversity within and surrounding the neighbourhood area.
Climate change and flood risk	Reduce the contribution to climate change made by activities within the neighbourhood area and increase resilience to the potential effects of climate change, including flooding.
Community wellbeing	Ensure growth in the neighbourhood area is aligned with the needs of all residents, improving accessibility, anticipating future needs and specialist requirements, reducing deprivation, and supporting cohesive and inclusive communities.
Historic environment	Protect, conserve, and enhance the historic environment within and surrounding the neighbourhood area.
Land, soil, and water resources	Ensure the efficient and effective use of land, and protect and enhance water quality, using water resources in a sustainable manner.
Landscape	Protect and enhance the character and quality of the immediate and surrounding landscape and townscape.
Transportation and movement	Promote sustainable transport use and active travel opportunities and reduce the need to travel.

Plan-making/ SEA up to this point (Part 1 of the Environmental Report)

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 plan 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 alternative sites.

Specifically, Part 1 of the report -

1. Explains the process of establishing the reasonable alternatives.
2. Presents the outcomes of assessing the reasonable alternatives.
3. Explains reasons for establishing the preferred option, considering the assessment.

The decision was taken to develop and assess reasonable alternatives in relation to the matter of allocating land for housing, given the following considerations:

- SMNP objectives, particularly the objectives to allocate a site for future development and provide affordable market homes and smaller houses / flats.

- Housing growth is known to be a matter of key interest amongst residents and other stakeholders; and
- The delivery of new homes is most likely to have a significant effect compared to the other proposals within the Plan. National Planning Practice Guidance is clear that SEA should focus on matters likely to give rise to significant effects.

Establishing the reasonable alternatives

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

Headline considerations in forming alternatives are summarised below:

- Whilst there is no strategic requirement for the SMNP to allocate land for further housing development, there are clear SMNP objectives to do so and contribute to addressing affordable housing needs.
- In exploring site options, Mendip Council have provided clear reasons to reject three sites identified through the HELAA, and these sites are not considered reasonable for further examination through the SEA/ SMNP process. The former prison site has also been identified through the HELAA and brownfield register and allocated in the Local Plan. This site is also therefore not considered a reasonable alternative option (but rather considered a 'given' over the plan period).
- Seven sites can therefore be identified (six sites through the HELAA and one site from the brownfield register) as potentially in contention for allocation in the SMNP.
- The site west of the Cannards Grave Road site which was formerly identified as a 'Future Growth Area' in the Local Plan (but withdrawn at examination) – SHEP092 Land North of Ridge Land, is the currently preferred option for the SMNP.

The seven sites are considered in greater detail and form the reasonable alternatives for the SMNP thus the following options are established:

- **Option 1:** SHEP092 Land North of Ridge Land, Shepton Mallet with an estimated capacity for 390 homes, though the deliverable figure is likely to be less as only the land within the neighbourhood area could be allocated.
- **Option 2:** SHEP014 Land at Commercial Road and Little Ostry with an estimated capacity for 25 new homes.
- **Option 3:** SHEP037 Land at Tadley Acres (former School site) with an estimated capacity for 30 new homes.
- **Option 4:** SHEP013 Land at Old Wells Road, Shepton Mallet with an estimated capacity for 140 new homes, though the deliverable figure is likely to be less as only the land within the neighbourhood area could be allocated.
- **Option 5:** SHEP105 Land off Westway Lane with an estimated capacity for 15 new homes.
- **Option 6:** SHEP106 Land North of Old Wells Road with an estimated capacity for 115 homes; and
- **Option 7:** 14/16 Commercial Road, Shepton Mallet (Little Ostry) (taken from brownfield register) with the capacity for up to ten new homes.

Appraising the reasonable alternatives

Chapter 6 of the Environmental Report assesses the seven options identified above in relation to the SEA themes and objectives established through scoping, examining likely significant effects. Red is used to indicate the potential for significant negative effects and green indicates the potential for significant positive effects. Where appropriate uncertainty will also be noted with grey shading.

Efforts are also made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of significant effects. Numbers are used to highlight the option or options that are preferred from an SEA perspective with 1 performing the best. An 'equals' sign ("=") indicates options are ranked on par with each other and occurs when no significant/ meaningful differences can be drawn between options.

The following summary findings are reached in the appraisal of the options and supporting text can be found within the main report:

SEA theme	Summary findings	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7
Biodiversity and geodiversity	Significant effect?	No	No	No	No	No	No	No
	Rank	4	2	3	4	3	4	1
Climate change and flood risk	Significant effect?	No	No	No	No	No	No	No
	Rank	3	1	2	3	3	3	1
Community wellbeing	Significant effect?	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	1	2	2	1	3	1	2
Historic environment	Significant effect?	No	Yes – negative	Yes – negative	No	No	No	Yes – negative
	Rank	1	4	3	1	1	2	3
Land, soil, and water resources	Significant effect?	No	No	No	No	No	No	No
	Rank	3	1	2	3	2	3	1
Landscape	Significant effect?	Yes – negative	No	No	Yes – negative	No	Yes – negative	No
	Rank	4	1	2	4	3	4	1
Transportation and movement	Significant effect?	No	No	No	No	No	No	No
	Rank	3	2	1	3	3	3	1

Developing the preferred approach

The SMNP Steering Group provide the following reasoning for continuing with the preferred approach (Option 1):

“The context within which the SMNP Steering Group has been working can best be described as a national housing crisis. As a community, we are proud to make our own contribution towards its resolution. We strongly believe that Option 1 not only provides a realistic number of new homes but does so in a way that significantly benefits our own local community and goes some way to continuing the much-needed regeneration of our town. As this report underlines, it does so by offering strong connectivity to adjoining developments with the least impact on traffic growth in the historic centre, the greatest option for enhancing the quality of life of our residents, and the greatest flexibility for developers to satisfy the range of different housing needs identified in this plan.

Its proximity to open countryside, its ability to enhance environmental benefits through integrated green corridors, and its avoidance of the potential flooding issues in other options all support this decision. We recognise that any new development will have a visual impact for local communities and have suggested measures that will reduce the negative effects of this option. Inevitably, meeting the pressing need for new homes will create visual change, but by identifying a site that can be integrated with the neighbouring allocation already identified in Cannards Grave Road, that visual impact can also be reduced.”

SEA findings at this stage (Part 2 of the Environmental Report)

Part 2 of the Environmental Report presents an assessment of the ‘Pre-Submission’ version of the SMNP. Assessment findings are presented as a series of narratives under the ‘SEA framework’ theme headings and consideration is given to cumulative effects. The following conclusions are reached:

Significant long-term positive effects are considered likely in relation to community wellbeing, due to the plan bringing forward additional dwellings and improvements and enhancements to existing community and public realm features.

Minor long-term positive effects are considered likely in relation to biodiversity and geodiversity and the historic environment through design stipulations under the site allocation policy that ensures important features are maintained and enhanced and suitable mitigation is deployed. The wider SMNP policies also consider biodiversity and geodiversity and the historic environment through protecting and enhancing sites and features of value, which improves the setting and quality of the neighbourhood area and its environment.

Broadly neutral effects are considered most likely in relation to transportation and movement, as the policies in the SMNP detail how the allocated site will be integrated into the transport network and how active and sustainable transportation options will be encouraged.

Neutral effects (i.e., no significant deviations from the baseline) are also considered likely in relation to climate change and flood risk, as whilst development could result in increased emissions originating from the area, the site allocation policy and wider

plan policies work to reduce emissions. The policies also work to reduce the risk of flooding.

Minor negative effects are concluded as most likely in relation to the land, soil, and water resources and landscape themes – as development of the allocated site will result in the loss of greenfield (Grade 3 agricultural quality) land and result in settlement expansion, but the wider plan policies include stipulations that will prevent water contamination and protect and enhance land and soil resources as well as minimise landscape impacts.

No significant negative effects are considered likely in implementing the SMNP and no strategic recommendations are made for the plan at this stage. Despite this, it is recognised that views from Natural England and the Minerals Authority are being sought through consultation to better inform considerations in relation to nearby SSSIs and mineral safeguarded areas.

Next steps (Part 3 of the Environmental Report)

Part 3 of the Environmental Report explains the next steps that will be taken as part of plan-making and SEA.

Plan submission

Following Regulation 14 Consultation, responses received will be considered and the SMNP and SEA Environmental Report will be finalised for submission.

Following submission, the plan and supporting evidence will be published for further consultation, and then subjected to Independent Examination. At Independent Examination, the plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.

If the examination leads to a favourable outcome, the plan will then be subject to a referendum, organised by Somerset Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once 'made', the plan will become part of the Development Plan for Somerset, covering the defined neighbourhood 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 Somerset Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the SMNP that would warrant more stringent monitoring over and above that already undertaken by the Council.

1. Introduction

Background

- 1.1 AECOM is commissioned to lead on Strategic Environmental Assessment (SEA) in support of the emerging Shepton Mallet Neighbourhood Plan (SMNP).
- 1.2 The SMNP is being prepared under the Localism Act 2011 and the Neighbourhood Planning (General) Regulations 2012, and in the context of the adopted Mendip Local Plan Parts 1 and 2. Once 'made' the SMNP will have material weight when deciding on planning applications, alongside the Local Plan.
- 1.3 SEA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding the mitigating negative effects and maximising positive effects. SEA of the SMNP is a legal requirement³.

SEA explained

- 1.4 It is a requirement that SEA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004. In-line with the Regulations, a report (known as the Environmental Report) must be published for consultation alongside the draft plan that "*identifies, describes and evaluates*" the likely significant effects of implementing "*the plan, and reasonable alternatives*"⁴. The report must then be considered, alongside consultation responses, when finalising the plan.
- 1.5 More specifically, the Report must answer the following three questions:
 4. What has plan-making / SEA involved up to this point?
 - Including in relation to 'reasonable alternatives'.
 5. What are the SEA findings at this stage?
 - i.e., in relation to the draft plan.
 6. What happens next?
- 1.6 This report is the Environmental Report for the SMNP. It is published alongside the 'pre-submission' version of the Plan, under Regulation 14 of the Neighbourhood Planning Regulations (2012, as amended).
- 1.7 This report essentially answers questions 1, 2 and 3 (para 1.4 above) in turn, to provide the required information⁵. Each question is answered within a discrete 'part' of the report (Part 1, Part 2, and Part 3). However, before answering question 1, two initial questions are answered to further set the scene; what is the plan seeking to achieve? And what is the scope of the SEA?

³ 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 SMNP was subject to screening in 2022 which determined SEA is required.

⁴ Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004.

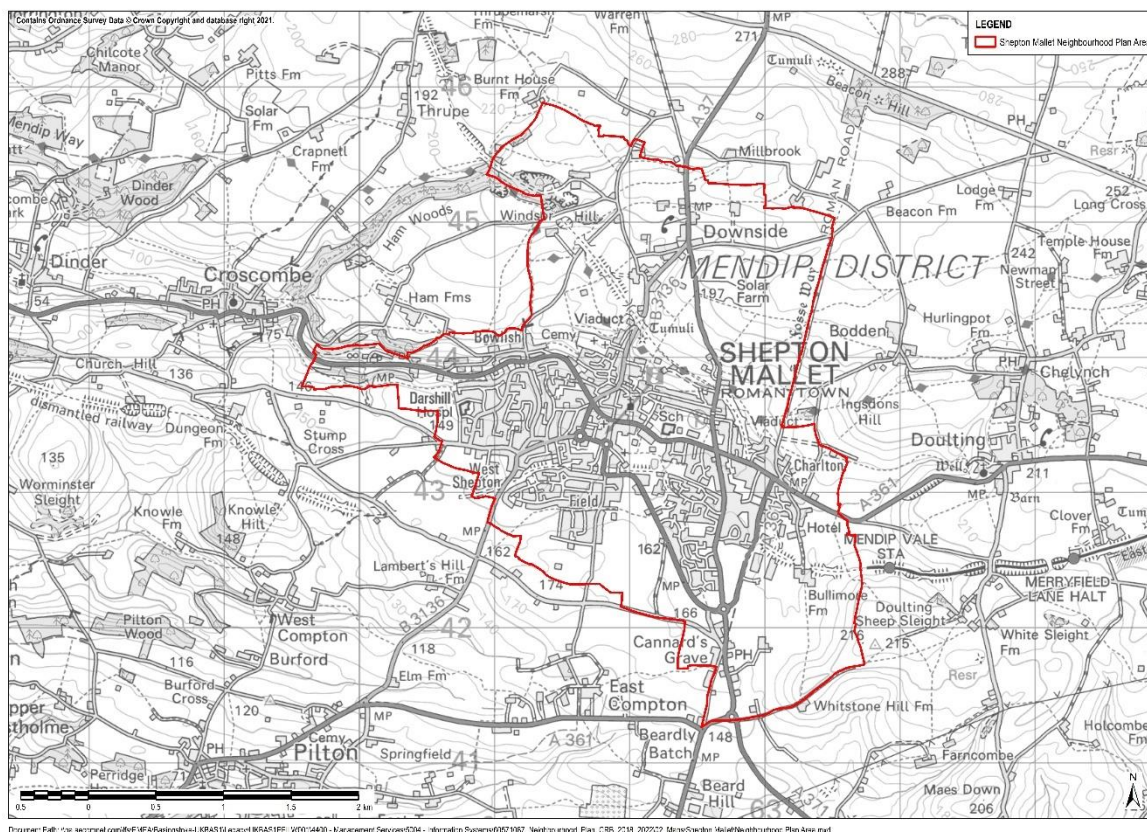
⁵ See Appendix A for further explanation of the regulatory basis for answering certain questions within the Environmental Report, and a 'checklist' explaining more precisely the regulatory basis for presenting certain information.

2. What is the plan seeking to achieve?

Introduction

2.1 This section considers the strategic planning policy context provided by the adopted Mendip Local Plan Parts 1 and 2, before presenting the vision and objectives of the SMNP. Figure 2.1 below presents the neighbourhood area.

Figure 2.1: Shepton Mallet neighbourhood area



Strategic planning policy context

- 2.2 The Mendip Local Plan Part 1 (LPP1) was adopted in 2014 and provides the strategic plan and policies for the district. Local Plan Part 2 (LPP2) was adopted in 2021 and provides specific site allocations and policies.
- 2.3 LPP1 Core Policy 1 (Mendip Spatial Strategy) identifies Shepton Mallet as a principal settlement within the highest tier of the settlement hierarchy and most growth will be directed to principal settlements. Core Policy 2 (Supporting the Provision of New Housing) identifies an annual target provision for Shepton Mallet at 60 dwellings per annum in the period up to 2029. This equates to a total of 1300 homes over the plan period and Core Policy 9 (Shepton Mallet Town Strategy) identifies the strategic site adjacent to the western side of Cannard's Grave Road which will deliver 500 of these homes.
- 2.4 LPP1 Core Policy 9 allocates 10 hectares of new employment land at the Bath and West Showground (just outside the neighbourhood area), which will deliver against most of the identified needs for 1,300 new jobs over the plan period.

- 2.5 Additionally, LPP1 Core Policy 9 seeks the regeneration of the town centre through mixed use development, identifying a need for up to 5,000sqm retail floor space and 5,500sqm of office space for small businesses.
- 2.6 LPP2 provides an update in terms of target figures for new housing over the plan period. It shows 727 homes were completed in the period up to March 2019 and a further supply of 786 dwellings is identified. The supply figure includes allocated land at Cannard's Grave Road which has been subject to a detailed masterplanning exercise. The site is now expected to deliver in the region of 600 homes. In addition to this site, consent has been granted for the refurbishment and redevelopment of the former Shepton Mallet Prison for 134 dwellings. Given that the forecasted supply will deliver a substantial uplift over the LPP1 requirement, no additional sites are allocated in the town in LPP2.

Neighbourhood Plan vision and objectives

- 2.7 The SMNP has established the following vision:

"In 2036, Shepton Mallet is still a pleasant place to live. It has grown considerably in size, but good planning, which has taken account of the concerns and policies included in the Neighbourhood Plan, has meant that its character as one of Somerset's historic small market towns has been firmly established.

Shepton Mallet has effectively addressed its key issue of the town centre. It has successfully regenerated the town centre which now boasts a range of independent shops and businesses, and Shepton Mallet has become the "Food and Drink" destination of this area of the Southwest. In particular, the area of the High Street North and Market Place has been developed and has become the retail centre of the town with tourism as its main attraction.

Secondly, there have been great improvement in traffic management and pedestrian safety. The improvements to bus service infrastructure and the development of walkways and cycle paths into and around the town centre have encouraged people to leave their cars at home. This has reduced congestion and the pressure on the town's car parks, and so has improved the town centre as a place to stop and walk around, and its shops and businesses are thriving in both daytime and evening. This has led to increasing job opportunities for local people.

The protection of the character of the town centre, including the actions taken with regard to former derelict and empty shops and buildings, has led to an increase in the number of visitors and tourists coming to the town.

Access to the countryside and its many walking and cycling routes is easy, and visitors and residents are enjoying the high-quality environment and leisure activities. The environment has been protected with a number of Local Green Spaces being allocated, and our biodiversity has been enhanced.

Better health and leisure facilities have been developed, and those green spaces listed in the Neighbourhood Plan because of their recreational and informal leisure value, have been retained and improved to meet the needs of all sections of the population. In addition, new green spaces have been provided as part of recent housing developments.

Some small-scale housing development has taken place on infill sites, but in accordance with the policies in the Plan it has matched the size, scale, and character of the existing built environment and has met local housing needs. This has meant that neither younger nor older people need now to move away to find affordable or suitable housing.

A strong community spirit continues to exist, and new residents have successfully integrated into the town, and this has given everyone the opportunity to participate in and live a healthy, safe, and satisfying life.”

- 2.8 To support this vision, 28 objectives have been identified, and categorised under five themes (with aims identified for each theme):

Housing and built environment (*Aim: to support future growth whilst retaining the distinctive historic character of the town, together with maintaining the rural setting and views*)

7. To allocate a site for future development in Shepton Mallet to meet the identified needs of the community including the provision of affordable homes
8. To ensure new development is sustainable and helps to protect the distinctiveness, character, and historic assets of Shepton Mallet, which also does not harm the conservation area
9. To ensure new houses are of high-quality design, in keeping with the established character of the area and built to BREEAM home standards
10. The mix of housing in any new development should be designed to meet the needs of the existing and future community and be built to Lifetime Homes Standards
11. To provide affordable market homes and smaller houses / flats suited to those wishing to downsize, to secure their first home, or to live in the neighbourhood area due to local connections
12. To concentrate development within, or immediately adjacent to, existing settlement boundaries
13. To maintain the conservation area
14. To utilise suitable brownfield sites within the settlement boundary for re-development
15. To provide appropriate levels of parking within new developments to ensure on road parking is minimised
16. To ensure any infill development in Cowl Street and Hillmead area is of high quality and sympathetic to its surroundings

Transport (*Aim: to ensure that future growth mitigates for the increased traffic and vehicle usage by making provision for this within development design*)

17. To ensure sufficient ingress and egress to and from any new developments to minimise detrimental effects of increased vehicle usage
18. To encourage walking and cycling by improving local transport links and public right of way routes within the neighbourhood area and to adjacent parishes, including green lanes to provide for safer travel and healthier lifestyles

19. Improve cycle routes in the town and connect to the Strawberry Line
20. To improve the traffic management within the Town Centre to make it a more pleasant place for residents and visitors
21. Help reduce carbon emissions by encouraging the use of public transport with improved services and facilities
22. Provide adequate parking facilities for vehicles and cycles

Town Centre and Economy (*Aim: to support the local economy through its existing businesses and to encourage expansion of local employment within settlements*)

23. Provide for and enhance existing facilities and support initiatives to attract visitors and tourists to the town, in particular the built heritage
24. Existing employment land should be retained, and new employment opportunities encouraged within the town to support the growing population
25. Protect existing employment premises from change of use or redevelopment where the existing businesses are of demonstrable benefit to the community and encourage new independent business
26. Preserve the historic core of the town

Environment (*Aim: to protect and enhance the wildlife, environment and heritage assets within the diverse landscapes and views of the neighbourhood area*)

27. To have a thriving community which maintains its heritage assets and green areas as a haven for wildlife
28. To allocate areas which are of importance to the community as Local Green Space
29. To preserve important views within the neighbourhood area
30. To preserve the views from the hills surrounding the town
31. Support proposals that result in retention of natural habitats, for example protecting / creating new green spaces in new housing developments

Health, Recreation and Community (*Aim: ensure a satisfactory and diverse range of local facilities appropriate for an expanding town*)

32. Ensure the provision of appropriate and adequate health services to meet the needs of a growing and ageing population, including pandemic readiness
33. Existing parks, play areas, playing fields and open spaces should be retained and additional open space areas provided
34. Provide space for the provision of community leisure facilities

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 themes and objectives that should be a focus of the assessment of the plan and reasonable alternatives. Further information, i.e., the key issues which supported the development of the objectives, is presented in Appendix B.

Consultation

3.2 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 England⁶. As such, these authorities were consulted in May 2022. Responses were received from all three consultation bodies, the details of which are provided in Appendix B.

The SEA Framework

3.3 The SEA scope is summarised in a list of themes and objectives, known as the SEA framework. Table 3.1 presents the SEA framework as broadly agreed in 2022.

Table 3.1: SEA framework

SEA topic	SEA objective
Biodiversity and geodiversity	Protect and enhance biodiversity and geodiversity within and surrounding the neighbourhood area.
Climate change and flood risk	Reduce the contribution to climate change made by activities within the neighbourhood area and increase resilience to the potential effects of climate change, including flooding.
Community wellbeing	Ensure growth in the neighbourhood area is aligned with the needs of all residents, improving accessibility, anticipating future needs and specialist requirements, reducing deprivation, and supporting cohesive and inclusive communities.
Historic environment	Protect, conserve, and enhance the historic environment within and surrounding the neighbourhood area.
Land, soil, and water resources	Ensure the efficient and effective use of land, and protect and enhance water quality, using water resources in a sustainable manner.
Landscape	Protect and enhance the character and quality of the immediate and surrounding landscape and townscape.
Transportation and movement	Promote sustainable transport use and active travel opportunities and reduce the need to travel.

⁶ 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*” (SEA Directive, Article 6(3)).

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

4. Introduction (to Part 1)

Overview

- 4.1 Whilst work on the SMNP has been underway for some time, the aim here is not to provide a comprehensive explanation of all the work carried out to date, but rather to explain work undertaken to development and appraise reasonable alternatives to the preferred plan approach.
- 4.2 More specifically, this part of the report presents information on the consideration given to reasonable alternative approaches to addressing a particular issue that is of central importance to the Plan, namely the allocation of land for housing, or alternative sites.

Why focus on housing land?

- 4.3 The decision was taken to develop and assess reasonable alternatives in relation to the matter of allocating land for housing, given the following considerations:
- SMNP objectives, particularly the objectives to allocate a site for future development and provide affordable market homes and smaller houses / flats.
 - Housing growth is known to be a matter of key interest amongst residents and other stakeholders.
 - The delivery of new homes is most likely to have a significant effect compared to the other proposals within the Plan. National Planning Practice Guidance is clear that SEA should focus on matters likely to give rise to significant effects; and

Structure of this part of the report

- 4.4 This part of the report is structured as follows:
- **Chapter 5** - explains the process of establishing reasonable alternatives.
 - **Chapter 6** - presents the outcomes of appraising reasonable alternatives; and
 - **Chapter 7** - explains reasons for selecting the preferred option, considering the appraisal.

5. Establishing reasonable alternatives

Introduction

- 5.1 The aim here is to explain the process that led to the establishment of alternative sites and thereby present “*an outline of the reasons for selecting the alternatives dealt with*”.⁷
- 5.2 Specifically, there is a need to explore the context for the SMNP and explain the parameters that have a bearing on the establishment of options, as well as the work that has been undertaken to date to examine site options (i.e., sites potentially in contention for allocation in the SMNP). These parameters are then drawn together in order to arrive at ‘reasonable alternatives’.

Strategic parameters

- 5.3 To reiterate, the adopted Mendip Local Plan Part 1 (LPP1) was adopted in 2014 and sets out the planning policies for the Mendip area of Somerset, including the vision, the spatial strategy, town strategies and local development policies. Local Plan Part 2 (LPP2) was adopted in 2021 and provides specific site allocations and policies. In combination they provide the main strategic context for the SMNP.
- 5.4 Core Policy 1 under LPP1 identifies Shepton Mallet as a ‘principal settlement’ within the highest tier of the settlement hierarchy. As such, it has a greater level of growth directed to it. Core Policy 2 under LPP1 identifies an annual housing target provision for Shepton Mallet of 60 dwellings per annum up to 2029, equating to 1300 homes over the SMNP period.
- 5.5 LPP2 identifies that as of March 2019, 727 homes were completed, and 786 new homes are anticipated through new land allocations/ permissions. This includes the Cannards Grave Road site, which is expected to bring forward approximately 600 dwellings. Additionally, consent has been granted for redevelopment of the former HM Shepton Mallet Prison for 134 dwellings.
- 5.6 Given the forecasted land supply exceeds the strategic growth target outlined by LPP1, no additional sites were allocated in the town under the Mendip Local Plan.
- 5.7 However, the SMNP Steering Group have noted that previously, LPP1 in its development also set an expectation for additional development west of the strategic allocation site at Cannards Grave Road, identifying it as a ‘Future Growth Area’. This was removed during examination.
- 5.8 Additionally, a Housing Needs Assessment (HNA) was undertaken in 2023 to support the evidence base underpinning the SMNP. This work identified an average of 6.3 households a year needing affordable rental properties, and up to 38 households a year requiring affordable home ownership. This equates to a significant proportion of the strategic growth target of 1300 homes and more than is likely to be delivered at the allocated Cannards Grave Road and former Prison sites.

⁷ Schedule 2(8) of the SEA Regulations

Site options

5.9 The Housing and Economic Land Availability Assessment (HELAA) (2015) supporting the Mendip LPP2 identified ten sites within the Shepton Mallet area, see Figures 5.1 and 5.2.

Figure 5.1: Mendip HELAA Sites (1)

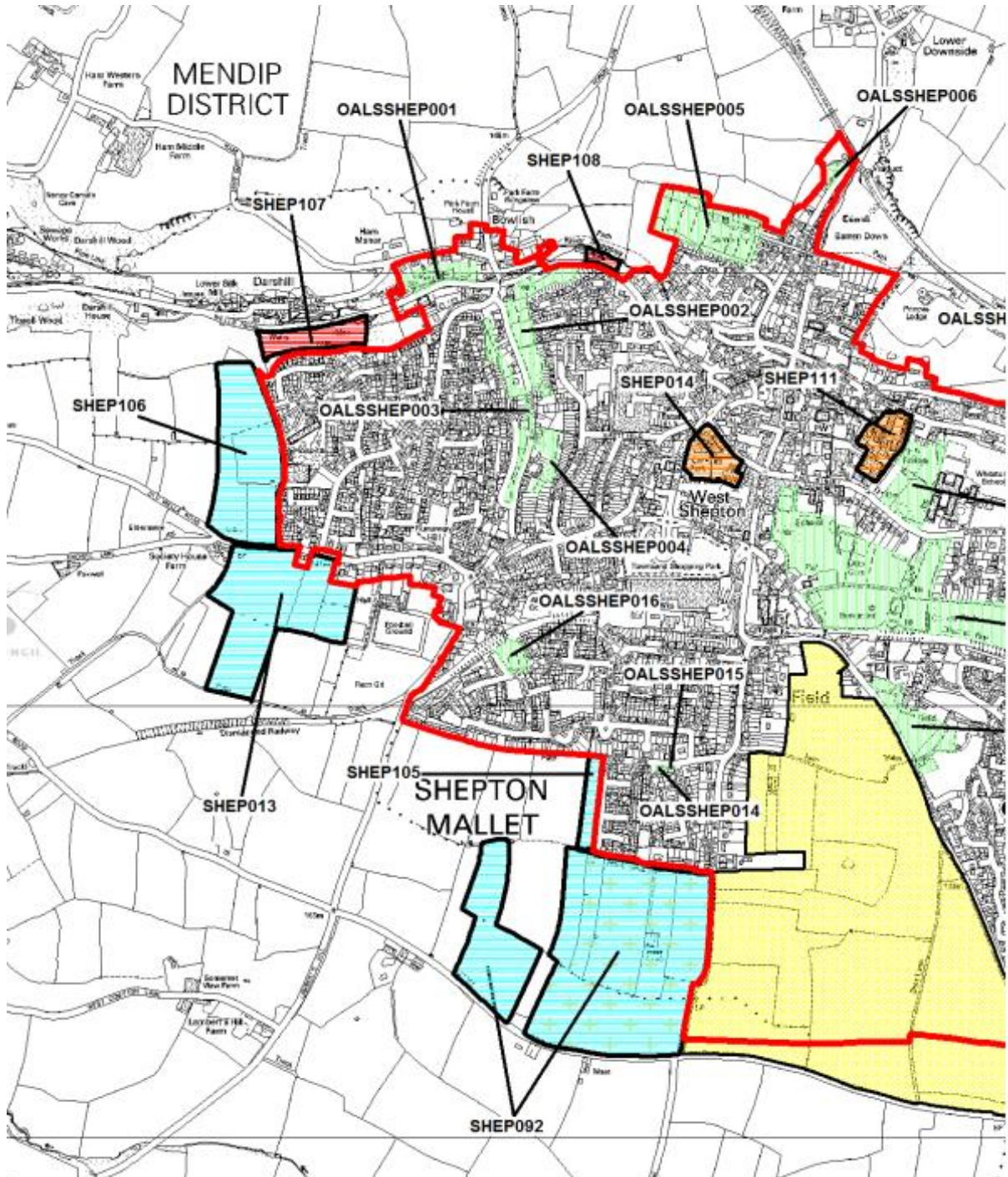
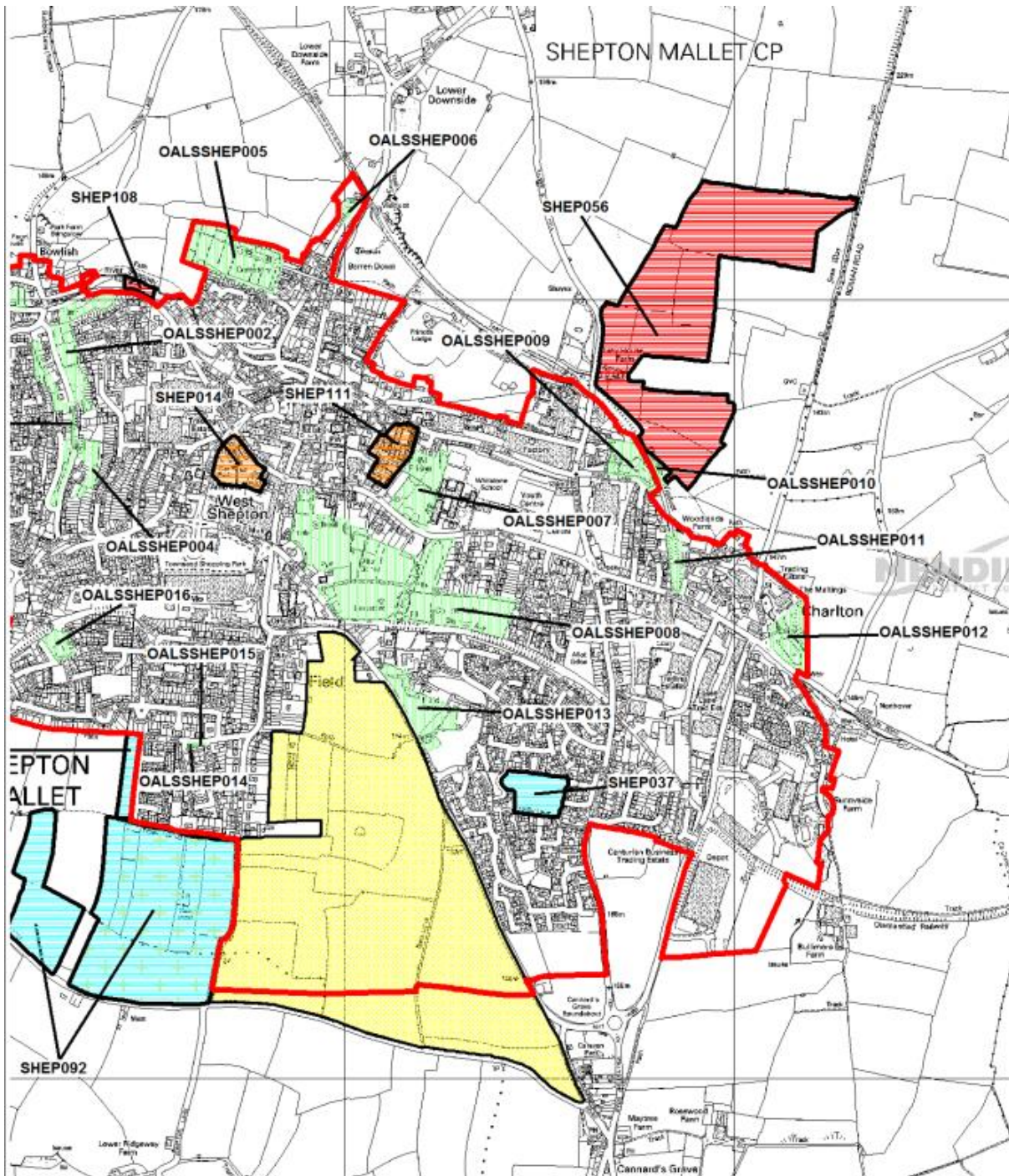


Figure 5.2: Mendip HELAA Sites (2)



5.10 Three sites in the HELAA were excluded or concluded unsuitable for development:

- Site SHEP056 was found unsuitable given its potential or significant landscape impacts.
- Site SHEP107 was excluded given its overlap with the Shepton Mallet Conservation Area, its potential landscape impact and topography, access issues (including its proximity to public rights of way) and its position in a river buffer zone; and

- Site SHEP108 was removed given its overlap with a river buffer zone, its contribution to the Shepton Mallet Conservation Area as an open space, and its potential to impact on the landscape.

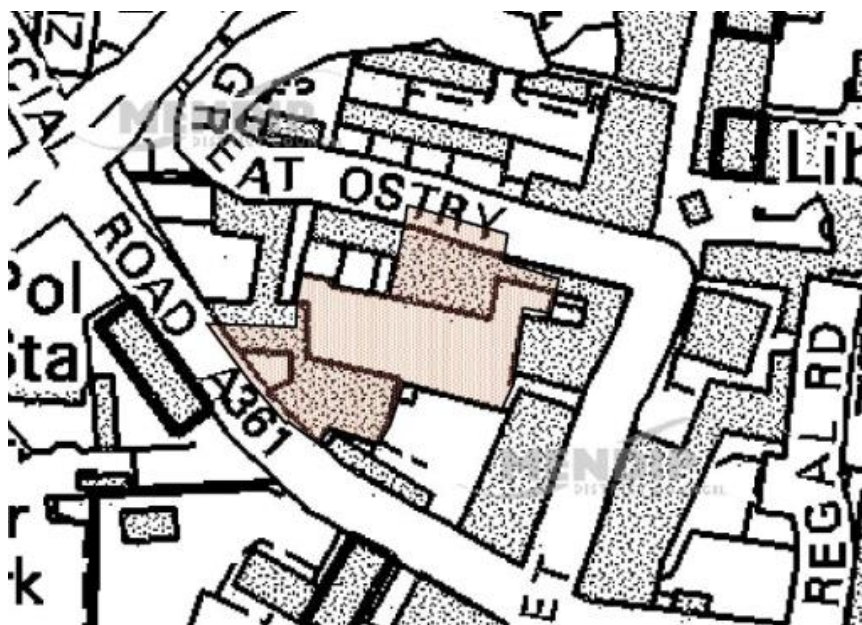
5.11 The remaining seven sites were potentially suitable development options – three that are within the current development limit, and four outside of it⁸:

- Sites within the current development limit:
 - SHEP111: Shepton Mallet Prison.
 - SHEP014: Land at Commercial Road and Little Ostry; and
 - SHEP037: Land at Tadley Acres (former School site).
- Sites outside the current development limit:
 - SHEP013: Land at Old Wells Road, Shepton Mallet.
 - SHEP092: Land North of Ridge Land, Shepton Mallet.
 - SHEP105: Land off Westway Lane; and
 - SHEP106: Land North of Old Wells Road.

5.12 SHEP111: Shepton Mallet Prison has already been allocated in the Local Plan and included in the forecasted land supply figure of 786.

5.13 Separate to the HELAA, the Mendip District Council Brownfield Register indicates there are two brownfield sites within Shepton Mallet that would be suitable for development. One of these sites is again the former HM Shepton Mallet Prison site, which has already been allocated, and the other is the 14/16 Commercial Road, Shepton Mallet (Little Ostry) site, which has the potential to bring forward ten new dwellings⁹ - see Figure 5.3.

Figure 5.3: Brownfield register site¹⁰



⁸ Mendip District Council (2015) 'Issues and Options – Shepton Mallet Section' can be accessed [here](#).

⁹ Mendip District Council (2022) 'Mendip District Council Brownfield Register December 2022' can be accessed [here](#).

¹⁰ Taken from the Mendip Brownfield Register December 2022 accessed [here](#).

Establishing reasonable alternatives

- 5.14 Whilst there is no strategic requirement for the SMNP to allocate land for further housing development, there are clear SMNP objectives to do so and contribute to addressing affordable housing needs.
- 5.15 In exploring site options, Mendip Council have provided clear reasons to reject three sites identified through the HELAA, and these sites are not considered reasonable for further examination through the SEA/ SMNP process. The former prison site has also been identified through the HELAA and brownfield register and allocated in the Local Plan. This site is also therefore not considered a reasonable alternative option (but rather considered a 'given' over the plan period).
- 5.16 Seven sites can therefore be identified (six sites through the HELAA and one site from the brownfield register) as potentially in contention for allocation in the SMNP.
- 5.17 The site west of the Cannards Grave Road site which was formerly identified as a 'Future Growth Area' in the Local Plan (but withdrawn at examination) – SHEP092 Land North of Ridge Land, is the currently preferred option for the SMNP.
- 5.18 These sites (including the preferred option) form the reasonable alternatives for additional growth in the neighbourhood area over the plan period. The seven options are identified below with estimated capacities at each site (HELAA site capacities are based on a basic 20 dwelling per hectare calculation and used for indicative purposes only):
- **Option 1:** SHEP092 Land North of Ridge Land, Shepton Mallet with an estimated capacity for 390 homes, though the deliverable figure is likely to be less as only the land within the neighbourhood area could be allocated.
 - **Option 2:** SHEP014 Land at Commercial Road and Little Ostry with an estimated capacity for 25 new homes.
 - **Option 3:** SHEP037 Land at Tadley Acres (former School site) with an estimated capacity for 30 new homes.
 - **Option 4:** SHEP013 Land at Old Wells Road, Shepton Mallet with an estimated capacity for 140 new homes, though the deliverable figure is likely to be less as only the land within the neighbourhood area could be allocated.
 - **Option 5:** SHEP105 Land off Westway Lane with an estimated capacity for 15 new homes.
 - **Option 6:** SHEP106 Land North of Old Wells Road with an estimated capacity for 115 homes; and
 - **Option 7:** 14/16 Commercial Road, Shepton Mallet (Little Ostry) (taken from brownfield register) with the capacity for up to ten new homes.
- 5.19 These options are taken forward for appraisal.

6. Assessing reasonable alternatives

6.1 This chapter presents the findings for the appraisal of alternative options. As established in the previous chapter, the following seven options are taken forward for appraisal:

- **Option 1:** SHEP092 Land North of Ridge Land, Shepton Mallet with an estimated capacity for 390 homes, though the deliverable figure is likely to be less as only the land within the neighbourhood area could be allocated.
- **Option 2:** SHEP014 Land at Commercial Road and Little Ostry with an estimated capacity for 25 new homes.
- **Option 3:** SHEP037 Land at Tadley Acres (former School site) with an estimated capacity for 30 new homes.
- **Option 4:** SHEP013 Land at Old Wells Road, Shepton Mallet with an estimated capacity for 140 new homes, though the deliverable figure is likely to be less as only the land within the neighbourhood area could be allocated.
- **Option 5:** SHEP105 Land off Westway Lane with an estimated capacity for 15 new homes.
- **Option 6:** SHEP106 Land North of Old Wells Road with an estimated capacity for 115 homes; and
- **Option 7:** 14/16 Commercial Road, Shepton Mallet (Little Ostry) (taken from brownfield register) with the capacity for up to ten new homes.

Methodology

- 6.2 For each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability themes and objectives identified through scoping (see Table 3.1) as a methodological framework. Red is used to indicate the potential for significant negative effects and green indicates the potential for significant positive effects. Where appropriate uncertainty will also be noted with grey shading.
- 6.3 Every effort is made to predict effects accurately; however, where there is a need to rely on assumptions to reach a conclusion on a significant effect, this is made explicit in the appraisal text.
- 6.4 Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. Numbers are used to highlight the option or options that are preferred from an SEA perspective with 1 performing the best. An 'equals' sign ("=") indicates options are ranked on par with each other and occurs when no significant/ meaningful differences can be drawn between options.

6.5 Finally, it is important to note that effects are predicted considering the criteria presented within Regulations.¹¹ So, for example, account is taken of the duration, frequency, and reversibility of effects.

¹¹ Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004.

Summary findings

SEA theme	Summary findings	Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7
Biodiversity and geodiversity	Significant effect?	No	No	No	No	No	No	No
	Rank	4	2	3	4	3	4	1
Climate change and flood risk	Significant effect?	No	No	No	No	No	No	No
	Rank	3	1	2	3	3	3	1
Community wellbeing	Significant effect?	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive	Yes – positive
	Rank	1	2	2	1	3	1	2
Historic environment	Significant effect?	No	Yes – negative	Yes – negative	No	No	No	Yes - negative
	Rank	1	4	3	1	1	2	3
Land, soil, and water resources	Significant effect?	No	No	No	No	No	No	No
	Rank	3	1	2	3	2	3	1
Landscape	Significant effect?	Yes – negative	No	No	Yes – negative	No	Yes – negative	No
	Rank	4	1	2	4	3	4	1
Transportation and movement	Significant effect?	No	No	No	No	No	No	No
	Rank	3	2	1	3	3	3	1

Biodiversity and geodiversity

- 6.6 There are no internationally designated sites for biodiversity or geodiversity in proximity to the neighbourhood area, although there is local concern over the Somerset Levels and Moors Special Protection Area (SPA) and Ramsar site, which is located approximately 13km west of the neighbourhood area. Whilst most of the options are not near Sites of Special Scientific Interest (SSSIs), Options 2 and 7 are within 1km of the Viaduct Quarry SSSI. Despite this, neither of the sites, nor the rest of the sites, overlap with SSSI Impact Risk Zones (IRZs) for the types of development likely to be brought forward through the neighbourhood plan. Additionally, there are no locally designated biodiversity or geodiversity sites in the neighbourhood area.
- 6.7 In terms of habitats, Options 1, 5, 3 and 4 comprise acid, calcareous and / or neutral grassland, whilst Option 6 mostly comprises arable and horticultural, with areas of acid, calcareous and / or neutral grassland in the northern and eastern extents of the site. Option 7 comprises built-up areas and gardens, as does Option 2 – although it contains an area of broadleaved, mixed and yew woodland in the northern half of the site. None of the sites contain or are in proximity to Biodiversity Action Plan (BAP) Priority Habitats. However, it is noted that Options 1, 4 and 6 are larger sites, and are therefore more likely to result in negative impacts on biodiversity and geodiversity through potentially a greater area of habitat loss.
- 6.8 Considering the above, Option 7 is ranked most favourably as it does not contain a recognised habitat according to the Living England Habitat Map. Option 2 is ranked second most favourably given that the site mostly comprises built-up areas or gardens. Options 1, 4 and 6 are ranked least favourably given their comparatively large size, and therefore greater potential for biodiversity impacts linked to habitat loss – although it is noted that all options have low habitat values. Overall, whilst minor negative effects are anticipated for Options 1, 3, 4, 5 and 6 given their potential for habitat loss on site, no significant negative effects are deemed likely for any of the options.

Climate change and flood risk

- 6.9 With a focus on climate change adaptation, none of the options include sites at risk of fluvial flooding – they all fall within Flood Zone 1.
- 6.10 The sites under Options 1, 4 and 6 are all at very low risk of surface water flooding, with only a small area to the north of Option 1 at medium risk of surface water flooding (adjacent to Middleton Lane).
- 6.11 Option 2 contains an area at medium / high risk of surface water flooding in the centre of the site and is adjacent to Old Market Road and High Street – both of which are at medium / high flood risk. Option 7 does not contain areas at risk of surface water flooding; however, it is adjacent to the routeway Great Ostry, which is at medium risk of surface water flooding. Option 3 is at very low risk of surface water flooding, but it is adjacent to Starling Way, which is at low / medium / high risk of surface water flooding.
- 6.12 In respect of the above, it is recognised that the incorporation of sustainable drainage systems (SuDS) in areas with an increased risk of surface water flooding will play an essential role in mitigating the risk of flooding.

- 6.13 With a focus on climate change mitigation, it is recognised that larger sites have a greater potential to deliver on-site mitigation measures; however, this is dependent on the developer and is therefore uncertain at this stage. Distance to services and facilities is also an important factor here; Options 2 and 7 are located within the heart of the built-up area of Shepton Mallet, and as such, new residents are more likely to walk / cycle to access services and facilities. Option 3 is also located within the existing built-up area of Shepton Mallet, although it is not as central as the sites under Options 2 and 7.
- 6.14 Overall, Options 2 and 7 are ranked first; whilst they are at a higher risk of surface water flooding when compared to the other options, this is likely to be mitigated with the use of SuDS, and their location within the existing built-up area of Shepton Mallet means that these options are most likely to result in the uptake of active travel to access services and facilities. As a result, positive effects are considered likely, although not of significance. Option 3 is ranked second. The remaining options (Options 1, 4, 5 and 6) are ranked third; however, it is recognised that the larger sites have a greater potential to deliver on-site climate change mitigation measures.

Community wellbeing

- 6.15 Options 2 and 7, and to a lesser degree, Option 3, are considered likely to lead to greater integration of new residents with the existing community as they are located in the existing built-up area of Shepton Mallet. In addition, these options have the potential to bring regeneration to the town centre through the regeneration of brownfield sites, which may currently be detracting from the built environment.
- 6.16 On the other hand, the larger sites, located on the settlement edge, under Options 1, 4 and 6, have greater potential to deliver new, on-site community infrastructure, as well as other services and facilities, which could support the delivery of a thriving new community. In addition, larger sites are usually able to deliver a greater variety of housing types and tenures, including a greater number of affordable homes. Access to the surrounding countryside will also be greatest through these options, which will encourage active travel and benefit residents physical and mental health and wellbeing.
- 6.17 On balance, whilst all the options perform well under this SEA topic, leading to significant positive effects, Options 1, 4 and 6 are ranked highest given their potential to deliver the greatest variety of housing types and tenures, including affordable homes. Options 2, 3 and 7 are ranked second, due to their location within the existing built-up area of Shepton Mallet, whilst Option 5 is ranked last, as it is a small site located on the settlement edge.

Historic environment

- 6.18 All options, except Option 2, do not contain historic environment features; Option 2 contains two Grade II listed buildings on its north-eastern site boundary (Historic England List Entry Numbers [1058341](#) and [1058459](#)). However, Options 2, 3 and 7 are all within proximity to historic environment features. Options 2 and 7 are within proximity to a number of Grade II listed buildings to the north, east and south; Option 7 is also within proximity to a Grade II* listed building and scheduled monument (Historic England List Entry Numbers [1058383](#) and [1019974](#) – note this is the same feature with two separate designations). Meanwhile, Option 3 is 100m west of a scheduled monument (Historic England List Entry Number [1011635](#)). As such, development under Options 2, 3 and 7 has the potential to impact the significance of these historic environment features and their setting.
- 6.19 Options 2 and 7 are also within the Shepton Mallet Conservation Area; Option 3 and the northern half of Option 6 are also within proximity to this area. Hence, development through these options – particularly Options 2 and 7 – could impact the setting of the conservation area and the wider historic landscape.
- 6.20 In light of the above, Options 1, 4 and 5 rank first given their distance from historic environment features and the Shepton Mallet Conservation Area. As such, they are unlikely to result in any significant effects under this SEA topic. Option 6 is ranked next; whilst it is not near any historic environment features, it is in proximity to the Shepton Mallet Conservation Area, and could therefore impact its setting. Options 3 and 7 are ranked third; this is due to their proximity to historic environment features and the Shepton Mallet Conservation Area, with Option 7 being located within the conservation area, and Option 3 being located nearby. Finally, Option 2 is ranked last as it is located within the Shepton Mallet Conservation Area and is in proximity to several historic environment features. Overall, it is considered that Option 2, 3, and 7 have the potential for significant negative effects, and mitigation strategies should therefore be put in place to address the constraints if the sites are progressed.

Land, soil, and water resources

- 6.21 All options, except for Option 1, contain sites within a mineral safeguarding area for building stone. As such, if these options were to be taken forward, consultation with Somerset Council would be required.
- 6.22 None of the options are located near a watercourse (specifically the River Sheppey); however, they are all within the Sheppey waterbody catchment area. This catchment area was awarded a 'moderate' ecological status in 2019, and a 'failed' chemical status in the same year due to the presence of priority hazardous chemicals. As such, development under all options has the potential to worsen conditions in this watercourse in the absence of appropriate mitigation. Furthermore, all options fall within a Nitrate Vulnerability Zone (NVZ) for surface water (S553 – SHEPPEY). Hence, development will need to carefully consider drainage and water quality protection schemes to ensure pollutants do not enter the water system. Additionally, sites under Options 2, 3, and 7 overlap with a Source Protection Zone (SPZ) – specifically Zone II (Outer Protection). Again, if any of these three options were allocated, a carefully

thought-out scheme would need to be implemented to ensure water quality does not deteriorate because of development.

- 6.23 In the absence of a formal, in-depth land assessment, the provisional agricultural land classification (ALC) shows that Options 1, 3, 4, 5 and 6 contain Grade 3 ('Good to Moderate') land. However, it is not possible to determine whether this is Grade 3a (higher quality) or Grade 3b (lower quality) land. Options 1, 3, 4, 5 and 6 also have a low likelihood of being underlain by best and most versatile (BMV) land. As such, if they were allocated, it is unlikely that they would result in the loss of productive agricultural land. Nevertheless, Options 3 and 5 are seen to be the best choices given their smaller size; allocating these sites would lead to less greenfield land being lost. Options 2 and 7 are classed as 'land predominantly in urban use'. As such, allocating one or both of these options would not result in the loss of greenfield land. Instead, development of these sites would entail the regeneration of brownfield land.
- 6.24 In light of the above, Options 2 and 7 are ranked first as they are brownfield sites. Options 3 and 5 are ranked second as they comprise smaller sites, resulting in a less significant loss of greenfield land. Option 1, 4 and 6 are ranked last due to their size, resulting in the greatest loss of greenfield land. Nevertheless, as none of the sites have a high likelihood of being underlain by BMV land, no significant effects are anticipated under any of the options.

Landscape

- 6.25 Shepton Mallet is not within or in proximity to a nationally designated landscape. Options 1, 4, and 6 are all located on the edge of the existing built-up area of Shepton Mallet. Therefore, allocating any of these options for development would result in the settlement growing to the south (Option 1) or west (Options 4 and 6). Option 1 is also a gateway location and would be an extension of an existing allocation within the Local Plan. Notably, these options would result in Shepton Mallet expanding as far as the neighbourhood area boundary to the south and west.
- 6.26 Options 2, 3 and 7 are within the existing built-up area of Shepton Mallet, and as such, development under these options would not result in major changes to the character of the neighbourhood area or the wider landscape. However, it is noted that Option 3 is a publicly accessible green space; hence, development would lead to the loss of this space and could impact existing views in this area.
- 6.27 Option 5 is a relatively small site on the edge of the existing settlement boundary, and therefore impacts on the surrounding landscape are likely to be localised and relatively insignificant.
- 6.28 Overall, Options 2 and 7 are ranked first, as they will have minimal impacts on the existing landscape as they utilise brownfield land within the existing built-up area of Shepton Mallet. Option 3 is ranked second as, whilst it is also a brownfield site in the existing built-up area, it will result in the loss of public green space. Option 5 is ranked third, as whilst it is located on the settlement edge, it is a small site and is therefore unlikely to have any significant impacts on the surrounding landscape. Meanwhile, Options 1, 4 and 6 are ranked last as they comprise large sites on the settlement edge and are therefore most likely to impact the surrounding landscape and alter existing views out of Shepton Mallet. Due to this, significant negative effects are anticipated.

Transportation and movement

- 6.29 All options are likely to lead to an increase in private cars on the local road network to access destinations outside of Shepton Mallet, and therefore minor negative effects are anticipated. However, Options 2, 3 and 7 are located within the existing built-up area of Shepton Mallet and are therefore more likely to result in the uptake of active travel to access services and facilities.
- 6.30 Shepton Mallet is served by bus services (though these are infrequent and unreliable), however only Options 2, 3 and 7 are within proximity to bus stops. In this respect, only these options will likely result in the use of local bus services, though uptake is expected to be low until services and connections are improved. The nearest train station – Castle Cary Station – is approximately 11.5 km from the neighbourhood area, and whilst it is accessible by bus (again an infrequent service), the journey time is twice that by private car.
- 6.31 It is recognised that Option 2 intersects with a footpath, which runs through the centre of the site. Similarly, Option 6 intersects with two footpaths in the northern and eastern extents of the site. Hence, it will be important for development proposals for these options to maintain these public rights of way and fully integrate them into the site design if taken forward.
- 6.32 Overall, Options 3 and 7 are ranked first given their location with the existing built-up area of Shepton Mallet, which will encourage the use of active travel and public transport. Option 2 is ranked second, although development through this option will need to consider the public footpath that intersects with the site. The remaining options are ranked third. Again, Option 6 will need to consider the public footpath that intersects with the site. No significant effects are anticipated under any of the options.

7. Developing the preferred approach

- 7.1 The SMNP Steering Group provide the following reasoning for continuing with the preferred approach (Option 1 SHEP092 Land North of Ridge Land):

“The context within which the SMNP Steering Group has been working can best be described as a national housing crisis. As a community, we are proud to make our own contribution towards its resolution. We strongly believe that Option 1 not only provides a realistic number of new homes but does so in a way that significantly benefits our own local community and goes some way to continuing the much-needed regeneration of our town. As this report underlines, it does so by offering strong connectivity to adjoining developments with the least impact on traffic growth in the historic centre, the greatest option for enhancing the quality of life of our residents, and the greatest flexibility for developers to satisfy the range of different housing needs identified in this plan.

Its proximity to open countryside, its ability to enhance environmental benefits through integrated green corridors, and its avoidance of the potential flooding issues in other options all support this decision. We recognise that any new development will have a visual impact for local communities and have suggested measures that will reduce the negative effects of this option. Inevitably, meeting the pressing need for new homes will create visual change, but by identifying a site that can be integrated with the neighbouring allocation already identified in Cannards Grave Road, that visual impact can also be reduced.”

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

8. Introduction (to Part 2)

8.1 The aim of this section of the Environmental Report is to present appraisal findings and recommendations in relation to the current 'pre-submission' (draft) version of the SMNP. This section presents:

- An appraisal of the current version of the SMNP under the seven SEA topic headings (Chapter 9).
- Consideration of potential cumulative effects (Chapter 9); and
- The overall conclusions at this current stage and recommendations for the next stage of plan-making (Chapter 10).

8.2 This introductory chapter outlines the draft plan policies and the methodology for the appraisal.

Draft plan policies

8.3 The SMNP puts forward 24 policies to guide development in the neighbourhood area, as identified in Table 8.1.

Table 8.1: SMNP policies

Policy reference	Policy name
Policy 1	Housing Requirement
Policy 2	Site Allocation
Policy 3	Retain Buildings or Structures of Character
Policy 4	Integration with the Character of the Area
Policy 5	Materials
Policy 6	Housing Layout and Design
Policy 7	Housing Density and Mix
Policy 8	Built Up Area Boundary
Policy 9	Development in Conservation Area
Policy 10	Brownfield First
Policy 11	Parking Standards for New Residential Development
Policy 12	Minimising Effects of Additional Traffic
Policy 13	Improving Local Movement Routes
Policy 14	Better Traffic Management

Policy 15	Public Transport
Policy 16	Improvements to the Town Centre
Policy 17	Local Employment
Policy 18	Change of Use Retail Premises
Policy 19	Protection of Local Green Spaces
Policy 20	Preserve Important Views within the Neighbourhood Area
Policy 21	Green Infrastructure
Policy 22	Retention of Health Campus
Policy 23	Community Leisure Facilities
Policy 24	Play Park in Compton Road Development

Methodology

- 8.4 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.
- 8.5 Every effort is made to predict effects accurately; however, this is inherently challenging given the strategic nature of the policies under consideration and understanding of the baseline (now and in the future under a 'no plan' scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g., in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously and explained within the text (with the aim of striking a balance between comprehensiveness and conciseness). In many instances, given reasonable assumptions, it is not possible to predict 'significant effects', but it is possible to comment on merits (or otherwise) of the draft plan in more general terms.
- 8.6 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the SEA Regulations. So, for example, account is taken of the probability, duration, frequency, and reversibility of effects as far as possible. Cumulative effects are also considered, i.e., the potential for the Neighbourhood Plan to impact an aspect of the baseline when implemented alongside other plans, programmes, and projects. These effect 'characteristics' are described within the assessment as appropriate.

9. Assessment of the draft plan

Biodiversity and geodiversity

- 9.1 Whilst there are no internationally designated biodiversity and geodiversity sites within the neighbourhood area, they exist in the vicinity. The supporting Habitats Regulations Assessment (HRA) identifies potential impact pathways in relation to the Somerset Levels and Moors Ramsar and Special Protection Area (SPA), the Mells Valley Special Area of Conservation (SAC), and the North Somerset and Mendip Bats SAC designations nearby. The HRA has recommended policy wording to be included in the SMNP which will ensure that the Plan will not result in adverse effects on the integrity of these sites either alone or in-combination with other plans and the SEA supports these recommendations.
- 9.2 There are also seven Sites of Special Scientific Interest (SSSIs) which intersect or are within 1 km of the neighbourhood area. As such, development in the Shepton Mallet neighbourhood area could increase the pressure on these designations. Additionally, the neighbourhood area falls within associated SSSI Impact Risk Zones (IRZs) for development likely to be brought forward through the plan (e.g., residential, and rural residential). As part of an identified IRZ, the site allocated under Policy 2 would require further consultation with Natural England given its proposed size.
- 9.3 There are also Biodiversity Action Plan (BAP) Priority Habitats within the neighbourhood area, including: ancient woodland, good quality semi-improved grassland, lowland calcareous grassland, lowland fens, deciduous woodland, and traditional orchards. These habitats are located mostly within the northern half of the neighbourhood area and do not intersect the proposed allocation site.
- 9.4 SMNP Policy 2, the site allocation policy, indicates development proposals for the site will be supported where they include green space provision and landscape buffers. By incorporating green spaces and hedgerows / trees on the site boundaries, development will have a benefit for biodiversity and geodiversity by adding to the ecological network – allowing for increased species travel through the neighbourhood area. Additionally, this policy indicates proposals must demonstrate phosphorus neutrality, and if a phosphorus surplus is identified, mitigation must be deployed. This links to Policy 1, which indicates all residential developments will be required to demonstrate they have phosphorus neutrality. Where developments have a phosphorus surplus, mitigation could include new wetlands and reedbeds in development areas to help remove excess phosphorus from the system. As such, Policy 1 and Policy 2 could bring forward benefits for biodiversity and geodiversity by creating new habitat areas and preventing eutrophication processes linked to excess phosphate levels in nearby watercourses.
- 9.5 The wider SMNP policies also work to maintain and enhance biodiversity and geodiversity in the neighbourhood area. Policy 3 indicates housing layouts must retain important trees and hedgerows, and plant new trees and shrubs of similar species in the surroundings to improve the setting of heritage assets. The retention of existing trees and hedgerows will ensure present biodiversity connectivity is maintained – and planting new hedges and trees will allow for

the network to expand, potentially enhancing species movement and adding biodiversity hotspots to the neighbourhood area. Additionally, retaining local green spaces through Policy 14, and maintaining and extending green infrastructure through Policy 16 will also support existing ecological networks and enhance biodiversity and geodiversity in the neighbourhood area. Policies 15 and 17 also indicate development proposals that have the potential to negatively affect the designated local green spaces and green infrastructure will not be supported; and Policy 16 further goes on to indicate development proposals should maximise biodiversity opportunities (for example, proving linkages from the site to the existing ecological network, or create new ecological assets), as well as result in biodiversity net gain.

- 9.6 In conclusion, the site allocation under Policy 2 includes stipulations that will help to protect and enhance the biodiversity value of the site. This includes incorporating green space and boundary vegetation and deploying mitigation techniques to combat phosphorus surplus where this is a potential impact. Additionally, the wider plan policies work to protect the biodiversity and geodiversity value of the neighbourhood area by safeguarding trees and hedgerows, designated green spaces and green infrastructure whilst also looking to extend the ecological network through tree and hedgerow planting and creating new ecological assets. As such, **minor long-term positive effects** are considered most likely overall.

Climate change and flood risk

- 9.7 Mendip District Council/ Somerset Council declared a climate emergency on 25th February 2019; as such, the SMNP should encourage design features that help the area to mitigate and adapt to climate change and increase the resilience of the neighbourhood area and its community. The transport sector is the biggest contributor to carbon dioxide (CO₂) emissions in Somerset according to emissions data, though up until 2014 it was the industry and commercial sector. Opportunities to explore mitigation and adaptation techniques for transport, including electric vehicle charging provision and the enhancement of public transport, would be beneficial for cutting carbon emissions in the neighbourhood area. In terms of flood risk, areas most at fluvial flood risk within the neighbourhood area are along the course of the River Sheppey and around Collett Park. As such, fluvial flood risk is not a major concern for most of the neighbourhood area. Surface water flood risk is more prevalent throughout the neighbourhood area, with areas at risk in proximity to the River Sheppey, as well as to the north around Windsor Hill and Ham Lane. These areas could benefit from drainage and surface water flood mitigation.
- 9.8 The proposed site allocation under Policy 2 is located adjacent to the Shepton Mallet settlement. Given its proximity to Shepton Mallet and its connection to Compton Road, it is likely development at this location would allow for pedestrian and cycling opportunities. Furthermore, the policy indicates pedestrian and cycle access will be incorporated as part of the development to allow for links to the wider neighbourhood area. By having the opportunity to engage in active transportation options, CO₂ emissions resulting from travel within the neighbourhood area could decrease. Additionally, the policy indicates landscape buffers will be provided on the northern and eastern site boundaries, and green open space provided. These green features will help to

reduce emissions as plants capture and convert CO₂ into oxygen. Furthermore, appropriate drainage solutions and management strategies need to be implemented in development at this site; this will reduce the risk of surface water flooding (with a small area of medium surface water flood risk on site).

- 9.9 Some of the wider SMNP policies include guidance and stipulations that will work to mitigate climate change effects. Policy 1 indicates development proposals outside of the settlement boundary for Shepton Mallet and the site allocated under Policy 2 will not be permitted unless for named uses, including energy generation. This could extend to include renewable energy production. Policy 3 indicates development will be strongly supported where proposals seek to meet the highest possible standards in the Code for Sustainable Homes and Building Research Establishment Environmental Assessment Method (BREEAM) – ensuring methods and materials used are as sustainable as possible. This is reiterated in Policy 4. Additionally, this policy indicates trees and hedgerows should be retained where possible, and new trees and shrubs of similar species already in the surroundings should be planted. This ties into Policy 14 and Policy 16, which look to maintain and extend green spaces and the green network in the neighbourhood area. Again, this will help reduce emissions levels in the neighbourhood area by increasing the number of plants, thereby increasing CO₂ uptake. Policy 8 indicates development proposals that include building new roads will be strongly encouraged where drainage networks are included underneath their structure – thus reducing surface water flood risk. Policy 9 and Policy 10 will bring forward benefits in terms of this SEA theme by encouraging greater uptake in public transportation use and active transportation opportunities, thus reducing CO₂ emissions linked to transport and travel.
- 9.10 In conclusion, as the SMNP is seeking to integrate development with the existing settlement offer, the proposed site is unlikely to lead to significant adverse effects with respect to climate change and flood risk. The site allocation under Policy 2 includes stipulations that will contribute to reducing emissions and flood risk linked to development at this location. The wider plan policies also work to reduce the impact climate change and flood risk by incorporating flood management, responsible designs, increasing the green infrastructure network and encouraging a greater uptake in public and active transportation. As such, **broadly neutral effects** are anticipated for climate change and flood risk (with no significant deviations from the baseline expected).

Community wellbeing

- 9.11 Shepton Mallet has a range of services and facilities that serve the community well, including supermarkets, educational facilities (nursery / preschool up to secondary school), religious centres, leisure facilities, and healthcare centres. The neighbourhood area has varying levels of deprivation across different domains, but is universal in experiencing deprivation linked to education, skills, and training; additionally, the neighbourhood area experiences pockets of higher deprivation in the crime, barriers to housing and services, and income domains. It will be important for development in the neighbourhood area to work towards enhancing provisions that support local communities. Furthermore, it will be important for any new housing development to be

adaptable to accommodate for the increasing need for flexible working practices following the COVID-19 pandemic.

- 9.12 The SMNP allocates one site for housing development under Policy 2. This policy indicates the allocation is for approximately 140 to 150 new dwellings, which will be a mix of sizes and deliver 30% affordable housing. This will help to meet the needs to the neighbourhood area; the community have expressed the need for smaller homes for older people wishing to downsize and younger families requiring homes they can afford. By providing houses that meet the need of the community, the SMNP is helping to retain its community – in turn ensuring the population stays stable and aiding in the reduction of barriers to housing and services. It is noted Policy 5 also includes brownfield site opportunities for further housing development and two of the three sites already have planning permission.
- 9.13 Housing development quality provisions are made in Policy 4, which stipulates housing proposal needs in terms of house sizes and housing mix. This ensures development proposals bring forward levels of development that reflect the needs of the community. Policy 7 includes details as to how much parking provision should be made for different sized houses; ensuring there is enough space for vehicles in new development.
- 9.14 Maintaining and improving features that contribute to the public realm is a focus of multiple policies. Policy 1 indicates development through the site allocated in Policy 2 will need to include key infrastructure, like community facilities and education. This helps to ensure community needs are fully considered through and incorporated into new development, enhancing community wellbeing by delivering needed infrastructure. Policy 8 details how developments will be incorporated into the local highway network. This links to Policy 9 and Policy 10, which are concerned with local movement routes and public transportation. These three policies work to ensure community connectivity is maintained and enhanced through new development, allowing residents easy access in and around the neighbourhood area, as well as to other settlements, for work and leisure. Improvements to the built environment are included under Policy 11, Policy 17, Policy 18, and Policy 19: helping to safeguard existing community features (like the Lido and the Health Campus) whilst also bringing forward additional features, like a play park on the allocated site, and improvements to the town centre. This brings about benefits for the community by ensuring existing features and services are not lost/ diminished through an increase in development, and positive additions are made to improve user experience. Additionally, Policy 14 seeks to protect designated green spaces in the neighbourhood area – this brings benefits to community wellbeing by safeguarding areas for community gathering / events and areas that provide safe activity space.
- 9.15 Economic vitality is also considered through the SMNP policies. Policy 12 indicates existing locations that provide employment will be protected wherever possible. As such, this policy safeguards existing employment provision in the neighbourhood area; maintaining community wellbeing by protecting jobs. However, Policy 12 and Policy 13 do indicate changes in use that would result in the loss of employment use would only be considered acceptable where the alternative use proposed will make a positive contribution to the sustainability, vitality, and viability of the neighbourhood area. This ensures development that

could bring forward a greater number of benefits for community wellbeing is not blocked.

- 9.16 In conclusion, the site allocation under Policy 2 will enhance community wellbeing in the Shepton Mallet neighbourhood area by providing additional dwellings for the local population, paying attention to the needs of the community by ensuring there is affordable housing and a range of housing sizes. The wider SMNP policies also work to improve community wellbeing by maintaining and enhancing features that contribute to community cohesion and the public realm, whilst maintaining the character of the neighbourhood area and boosting connectivity. As such, **significant long-term positive effects** are anticipated in relation to community wellbeing.

Historic environment

- 9.17 Within the Shepton Mallet neighbourhood area there are a variety of historic environment features. This includes the Shepton Mallet Conservation Area (first designated in 1973 and most recently revised in 2007), 232 listed buildings (one Grade I, ten Grade II* and 212 Grade II), three scheduled monuments, and one historic environment feature on the Heritage at Risk Register (Anglo Trading Estate – Historic England List Entry Number [1296561](#)). It is important to ensure development avoids, or minimises, impacts upon the historic environment, and pursues opportunities to enhance it and any specific historic environment assets. This is especially true for the features that contribute to the Shepton Mallet Conservation Area.
- 9.18 Whilst there are no historic environment features within its boundaries, the site allocated under Policy 2 is within 1 km west of a scheduled monument – An area of the Romano-British linear Village at Fosse Lane, Shepton Mallet (Historic England List Entry Number [1011635](#)). Policy 2 does not make any stipulations for the historic environment; however, it does indicate development proposals must include appropriate landscaping to minimise the visual effect and landscape of the development. This will help to reduce potential impacts on the setting of historic features that are caused through developing the site. Policy 1 indicates development on the allocated site will need to conserve, and where possible enhance, the historic environment – indicating this can be achieved through high quality design and natural landscaping.
- 9.19 Policy 3 is concerned with the historic environment in the neighbourhood area. It stipulates all types of development proposals are expected to respect the Shepton Mallet Conservation Area through high quality and sustainable design and architecture. This includes regarding the character of surrounding buildings and spaces (for example, height and scale), using materials and colours that are in keeping with the surrounding area, retaining traditional heritage features, and ensuring designated heritage assets and their settings are preserved (this is also included in Policy 4). This will help to ensure new development is cohesive and fits in with existing features that are included within the Conservation Area and its setting, which reduces the potential for negative effects on the designation. Additionally, Policy 3 indicates archaeological investigations should be undertaken prior to development being started if there is a reasonable likelihood of archaeological remains being uncovered within or adjacent to the proposed site. This ensures important historic features are uncovered and preserved – which has the potential to

increase the historic interpretation and understanding of Shepton Mallet. Furthermore, Policy 6 is concerned with development proposals coming forward in the Shepton Mallet Conservation Area. It includes stipulations for development proposals (for example, indicating the proposed palette of materials, drawings demonstrating the proposal in relation to its surroundings etc). It also indicates proposals that would cause substantial harm to heritage assets will not be permitted unless substantial public benefits would be gained and outweigh the loss or / harm to the asset(s) in question. This ensures the importance of the Shepton Mallet Conservation is maintained whilst allowing considerate development to come forward.

- 9.20 Wider plan policies that focus on bringing forward improvements to the public realm and green infrastructure, including Policy 14 and Policy 16, will also aid in enhancing the historic environment of the neighbourhood area through maintaining and enhancing historic environment settings and improving the interpretation/ understanding of heritage assets.
- 9.21 In conclusion, the site allocation policy (Policy 2) includes stipulations that will help to screen development from nearby heritage assets. Additionally, Policy 3 and Policy 6 make specific provisions for the wider historic environment of the neighbourhood area and the Shepton Mallet Conservation Area, and wider plan policies work to maintain and enhance features that contribute to the settlement character and wider environment. These additional policy protections and design guidance will help to maintain and enhance historic environment features and their settings. As such, **minor long-term positive effects** are anticipated in relation to the historic environment.

Land, soil, and water resources

- 9.22 Provisional mapping indicates most of the neighbourhood area is underlain by Grade 3 'Good to Moderate' agricultural land, with the settlement area being classed as land predominantly in urban use. The undeveloped land has a moderate to high likelihood (>20%) of being best and most versatile (BMV) land. The northern part of the neighbourhood area is within a Minerals Safeguarding Area, and consultation with Somerset County Council will be required for development proposals in this area. The Sheppey waterbody is the main watercourse in the neighbourhood area – in 2019 it was awarded a moderate ecological status and a failed chemical status due to the presence of priority hazardous chemicals. The neighbourhood area is also within the Sheppey Surface Water Nitrate Vulnerability Zone (NVZ), and the eastern part of the neighbourhood area is covered by Source Protection Zones (SPZs). As such, development will need to be considerate of the natural resources in the neighbourhood area and how it could impact land, soil and water resources and their quality.
- 9.23 The site allocation under Policy 2 concerns a greenfield site located on the Shepton Mallet settlement edge. The policy stipulates development proposals for this site will need to include green open space, appropriate drainage solutions and management strategies (also included under Policy 8), and landscape buffers on the site boundaries (also included under Policy 3). These features will help support the capacity of the site to regulate soil and water quality. Additionally, this policy indicates proposals must demonstrate phosphorus neutrality, and if a phosphorus surplus is identified, mitigation must

be deployed. This links to Policy 1, which indicates all residential developments will be required to demonstrate they have phosphorus neutrality. This further ensures the water quality of the neighbourhood area is maintained, and no adverse impacts are caused for the water quality designations in the neighbourhood area.

- 9.24 Wider SMNP policies also contribute to maintaining and enhancing the quality of land, soil, and water resources in the neighbourhood area. Policy 3 indicates development proposals will be required to include a sufficient amount of space for waste storage, which will limit the amount of pollution entering the wider environment, thereby safeguarding natural resources. Policy 5 identifies brownfield sites on the Mendip Brownfield register within the Shepton Mallet settlement boundary – two of which have full planning permission – and indicates development on these sites and any other brownfield sites will be supported. This allows for the potential regeneration of previously developed land, helping to focus development away from solely greenfield opportunities. Additionally, Policy 14 and Policy 16, will also aid in safeguarding and enhancing land and soil quality through protecting the existing green network, and extending it – allowing for the preservation of soil quality in these areas.
- 9.25 In conclusion, the site allocation under Policy 2 is a greenfield site. The SMNP includes design stipulations that will help to protect land, soil, and water resources. Despite this, allocating this site will result in the loss of Grade 3 ‘Good to Moderate’ agricultural quality land. The wider plan policies work to reduce the risk of water contamination through implementing measures to prevent excess phosphorus entering the system; involve enhancing the green network, which helps to safeguard and enhance land and soil resources; and encourage brownfield development and the inclusion of waste storage space. As such, **minor negative effects** are anticipated in relation to land, soil, and water resources.

Landscape

- 9.26 The Shepton Mallet neighbourhood area overlaps with three National Character Areas (NCAs) - NCA 141: Mendip Hills; NCA 140: Yeovil Scarplands; and NCA 143: Mid Somerset Hills. It will be important for development proposals to consider the key characteristics of these national landscape character areas, as well as local landscape areas, as the neighbourhood area sits within local landscape character area A6: Sheppey Valley – Shepton Mallet, Croscombe and Dinder. In addition to considering landscape character areas and the features that contribute to them, future development will also need to consider the visual amenity of the neighbourhood area and the tree preservation orders (TPOs) that are in place, as these are key landscape components for Shepton Mallet.
- 9.27 The site allocation under Policy 2 includes stipulations for the landscape and character of the site and the wider area. It indicates green open space will be provided for the new development, landscape buffers placed on the northern and eastern site boundaries and considerate landscaping included as part of the development design. These stipulations will help to reduce the visual and landscape impact of the development on buildings and features within proximity to the site. Additionally, these policies help to boost the landscape value of the site for the new residents that will move into the development by helping to

break up development. The importance of considerate landscaping in development is also reiterated in Policy 1 – allowing for the retention of the rural character and physical structure of the existing Shepton Mallet settlement (reiterated in Policy 4). This links to Policy 3, which seeks to ensure the retention of important trees and hedgerows and increased vegetation planting, which contributes to the landscape quality of the neighbourhood area by breaking up development and preserving/ enhancing features that contribute important views.

- 9.28 Wider SMNP policies also work to maintain and enhance the landscape of the neighbourhood area. Policy 5 ensures landscape impacts are kept to a minimum by seeking and supporting development within the built-up area boundary and on brownfield sites. By focusing development within the built-up area boundary, the SMNP is limiting wider landscape impacts – as the risk of losing the visual amenity and key landscape features in the surrounding landscape is reduced. Additionally, retaining local green spaces through Policy 15, and maintaining and extending green infrastructure through Policy 17 will also maintain and enhance landscape quality in the neighbourhood area. Policy 15 also indicates development proposals that have the potential to negatively affect the designated local green spaces and green infrastructure will not be supported; this prevents the loss of green spaces that contribute to local character and townscape quality. Visual amenity is further considered through the SMNP in Policy 15, which safeguards iconic views from loss or degradation.
- 9.29 In conclusion, Policy 2 indicates development proposals for the site allocation will have a focus on landscape character and quality through incorporating landscape buffers and including respectful landscaping in the design. The wider plan policies also work to ensure development is considerate of the landscape by ensuring new development is in keeping with existing structures and is positioned as close to the built-up area boundary as possible. Furthermore, there are policies that work to protect key views, and maintain and enhance / extend green spaces and green infrastructure. This will benefit the landscape of the neighbourhood area by promoting landscape connectivity and protecting landscape character and townscape quality. In the absence of national landscape designations, and considering the mitigation proposed for the allocation site, no significant effects are considered likely. The continued loss of greenfield land at the settlement edge/ settlement expansion proposed is considered most likely to lead to **minor negative effects**.

Transport

- 9.30 The neighbourhood area is not well connected to public transportation infrastructure; there are no rail stations within the neighbourhood area or in proximity, and buses are limited to four buses services that run hourly on average. However, the neighbourhood area is well connected to the strategic road network – with the A37, A361, A371 and B3136 servicing the area; allowing connections to places like (but not limited to) Bristol, Castle Cary, Glastonbury, Beckington, Podimore and Wells. Public rights of way (PRoW) within the Shepton Mallet neighbourhood area consist of mainly footpaths with the occasional bridleway. These PRoWs should be safeguarded and enhanced where possible, especially as travel patterns continue to change following the COVID-19 pandemic.

- 9.31 The site allocated under Policy 2 is located adjacent to Compton Road to the west; this road connects to Ridge Lane in the south and Cannard's Grave Road in the north. As such, it allows for vehicular access to the centre of Shepton Mallet to the north and the wider strategic road network. Policy 2 indicates that vehicle access to the site will likely come from the northeastern corner (Compton Road / Middleton Lane); it also stipulates pedestrian and cycle access needs to be provided on the site, connected to the wider network in the neighbourhood area to allow for safe and active transportation to key facilities in the neighbourhood area. This will boost connectivity. Additionally, Policy 1 indicates development is expected to deliver appropriate transport and movement infrastructure, again affirming that development of the site will need to bring forward connections with the wider neighbourhood area.
- 9.32 Policy 3 includes stipulations for cars and bicycles; indicating development designs should have dedicated off street parking provision and appropriately placed bicycle parking to ensure a high-quality street layout. Policy 7 builds on this, indicating the minimum off road car parking provision for different house sizes; this allows for an appropriate amount of car parking to be factored into development design. Policy 8 includes stipulations for moving in and out of new development areas, including proposals demonstrating how they will be incorporated into the local highway network and the standards new roads will need to meet. This will ensure new transport infrastructure is well connected to the local transport network and is thoughtfully designed to be like existing routes. Connectivity is also sought in Policy 9 – which indicates new development will be encouraged to provide active transportation links into the existing network, and to local green spaces and public transport links. It also indicates development will need to ensure pavements are suitable for all users (for example, pushchair users and wheelchair users), and outlines some aspirational projects developments could help support, like cycle parking facilities. In this way, the policy is ensuring local transportation and movement is considerate of the whole community's needs and allows for greater movement within the Shepton Mallet neighbourhood area and beyond. Policy 10 of the SMNP is concerned with public transportation – indicating new development should improve the public transportation levels in the neighbourhood area.
- 9.33 In conclusion, Policy 2 indicates how access into and out of the allocated site will be achieved and includes stipulations how the site will be integrated into the local transportation network. This will bring forward benefits for the community by allowing easier and safer access in and around the neighbourhood area. The wider plan policies also ensure negative impacts on the local transport network, be that roads or public rights of way, are not experienced and instead help to guide development towards making improvements to the network through boosting connectivity and ensuring inclusivity when designing routes. Considering these policy provisions, **broadly neutral effects** are anticipated as most likely in relation to transport (i.e., no significant deviations from the baseline).

Cumulative effects

9.34 No significant cumulative effects are anticipated at this stage. The additional housing supply will contribute to Somerset's housing supply over the plan period, including affordable housing, which is of benefit. Impacts in relation to wider landscape geographies and water catchment areas are expected to be marginal or avoided in the long term, though the vulnerability of the area to surplus phosphorus is noted and the HRA recommends appropriate policy provisions to include in the SMNP to mitigate impacts arising.

10. Conclusions and recommendations

- 10.1 Significant long-term positive effects are considered likely in relation to community wellbeing, due to the plan bringing forward additional dwellings and improvements and enhancements to existing community and public realm features.
- 10.2 Minor long-term positive effects are considered likely in relation to biodiversity and geodiversity and the historic environment through design stipulations under the site allocation policy that ensures important features are maintained and enhanced and suitable mitigation is deployed. The wider SMNP policies also consider biodiversity and geodiversity and the historic environment through protecting and enhancing sites and features of value, which improves the setting and quality of the neighbourhood area and its environment.
- 10.3 Broadly neutral effects are considered most likely in relation to transportation and movement, as the policies in the SMNP detail how the allocated site will be integrated into the transport network and how active and sustainable transportation options will be encouraged.
- 10.4 Neutral effects (i.e., no significant deviations from the baseline) are also considered likely in relation to climate change and flood risk, as whilst development could result in increased emissions originating from the area, the site allocation policy and wider plan policies work to reduce emissions. The policies also work to reduce the risk of flooding.
- 10.5 Minor negative effects are concluded as most likely in relation to the land, soil, and water resources and landscape themes – as development of the allocated site will result in the loss of greenfield (Grade 3 agricultural quality) land and result in settlement expansion, but the wider plan policies include stipulations that will prevent water contamination and protect and enhance land and soil resources as well as minimise landscape impacts.
- 10.6 No significant negative effects are considered likely in implementing the SMNP and no strategic recommendations are made for the plan at this stage. Despite this, it is recognised that views from Natural England and the Minerals Authority are being sought through consultation to better inform considerations in relation to nearby SSSIs and Mineral Safeguarded Areas.

Part 3: What are the next steps?

11. Next steps

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

Plan finalisation

11.2 Following Regulation 14 Consultation, responses received will be considered and the SMNP and SEA Environmental Report will be finalised for submission.

11.3 Following submission, the plan and supporting evidence will be published for further consultation, and then subjected to Independent Examination. At Independent Examination, the plan will be considered in terms of whether it meets the Basic Conditions for Neighbourhood Plans and is in general conformity with the Local Plan.

11.4 If the examination leads to a favourable outcome, the plan will then be subject to a referendum, organised by Somerset Council. If more than 50% of those who vote agree with the Neighbourhood Plan, then it will be 'made'. Once 'made', the plan will become part of the Development Plan for Somerset, covering the defined neighbourhood 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 Neighbourhood Plan 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 Somerset Council as part of the process of preparing its Annual Monitoring Report (AMR). No significant negative effects are considered likely in the implementation of the SMNP that would warrant more stringent monitoring over and above that already undertaken by the Council.

Appendix A Regulatory requirements

As discussed in Chapter 1 of the main report, 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 AA-1** links the structure of this report to an interpretation of Schedule 2 requirements, whilst **Table AA-2** explains this interpretation. **Table AA-3** identifies how and where within the Environmental Report the regulatory requirements have/ will be met.

Table AA.1: Questions answered by the Environmental Report, in-line with an interpretation of regulatory requirements

Environmental Report question	In line with the SEA Regulations, the report must include... ¹²
What is the plan seeking to achieve?	<ul style="list-style-type: none"> An outline of the contents and main objectives of the plan.
What is the sustainability 'context'?	<ul style="list-style-type: none"> Relationship with other relevant plans and programmes. The 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 scope of the SEA?	<ul style="list-style-type: none"> The 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 is the sustainability 'baseline'?	<ul style="list-style-type: none"> The 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?	<ul style="list-style-type: none"> Key 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?	<ul style="list-style-type: none"> Outline reasons for selecting the alternatives dealt with. The likely significant effects associated with alternatives. Outline reasons for selecting the preferred approach in-light of alternatives appraisal/a description of how environmental objectives and considerations are reflected in the current version of the plan.
What are the assessment findings at this stage?	<ul style="list-style-type: none"> The likely significant effects associated with the Regulation 14 version of the plan. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the Regulation 14 version of the plan.
What happens next?	<ul style="list-style-type: none"> The next steps for the plan making / SEA process.

¹² NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

Table AA.2 Questions answered by the Environmental Report, in-line with an interpretation of regulatory requirements

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;		
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant environmental protection objectives, established at international or national level	i.e. answer - <i>What's the 'baseline'?</i>
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	The environmental characteristics of areas likely to be significantly affected	i.e. answer - <i>What are the key issues & objectives?</i>
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	Key environmental problems / issues and objectives that should be a focus of appraisal	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the Report]
(i) a description of the measures envisaged concerning monitoring.	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach')	
	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	i.e. answer - <i>What are the assessment findings at this current stage?</i> [Part 2 of the Report]
	The likely significant effects associated with the draft plan	
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	i.e. answer - <i>What happens next?</i> [Part 3 of the Report]
	A description of the measures envisaged concerning monitoring	

Table AA.3: ‘Checklist’ of how (throughout the SEA process) and where (within this report) regulatory requirements have been, are, and will be met.

Regulatory requirement	Discussion of how requirement is met
Schedule 2 of the regulations lists the information to be provided within the SA Report	
1. An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes.	Chapter 2 (‘What is the plan seeking to achieve’) presents this information.
2. The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters have been considered in detail through scoping work, which has involved dedicated consultation on a Scoping Report. The ‘SEA framework’ – the outcome of scoping – is presented within Chapter 3 (‘What is the scope of the SEA?’). More detailed messages, established through a context and baseline review are also presented in Appendix B of this Environmental Report.
3. The environmental characteristics of areas likely to be significantly affected; and	
4. Any existing environmental problems which are relevant to the plan or programme including those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	
5. The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been considered during its preparation.	The SEA framework is presented within Chapter 3 (‘What is the scope of the SEA’). Also, Appendix B presents key messages from the context review. With regards to explaining “how...considerations have been taken into account”, Chapter 7 explains the Steering Group’s ‘reasons for supporting the preferred approach’, i.e., explains how / why the preferred approach is justified in light of alternatives appraisal.
6. The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects).	Chapter 6 presents alternatives appraisal findings (in relation to housing growth, which is a ‘stand-out’ plan policy area). Chapters 9 presents an appraisal of the plan. With regards to assessment methodology, Chapter 8 explains the role of the SEA framework/scope, and the need to consider the potential for various effect characteristics/ dimensions, e.g., timescale.
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme.	The assessment highlights certain tensions between competing objectives, which might potentially be actioned by the Examiner, when finalising the plan. Also, specific recommendations are made in Chapter 10.
8. An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	Chapters 4 and 5 deal with ‘Reasons for selecting the alternatives dealt with’, in that there is an explanation of the reasons for focusing on particular issues and options. Also, Chapter 7 explains the Parish Council’s ‘reasons for selecting the preferred option’ (in-light of alternatives assessment).

Regulatory requirement	Discussion of how requirement is met
9. Description of measures envisaged concerning monitoring in accordance with Art. 10.	Chapter 11 presents measures envisaged concerning monitoring.
10. A non-technical summary of the information provided under the above headings.	The NTS is provided at the beginning of this Environmental Report.

The SA Report must be published alongside the Draft Plan, in accordance with the following regulations

Authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the Draft Plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	At the current time, this Environmental Report is published alongside the Shepton Mallet Neighbourhood Plan, with a view to informing Regulation 14 consultation.
---	---

The SA must be considered, alongside consultation responses, when finalising the plan.

The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	Assessment findings presented within this Environmental Report, and consultation responses received, have been fed back to the Steering Group and have informed/ will continue to inform plan finalisation.
---	---

Appendix B Scoping information

Linked to Chapter 3 of the Environmental Report, this appendix provides further scoping information.

Consultation responses

Statutory authorities were consulted in May 2022. Responses were received from Natural England, Historic England, and the Environment Agency and are documented below.

Consultation response	Considerations
<p>Historic England Historic Places Adviser for Historic England South West (email response received on 1st June 2022)</p> <p>I concur with my colleague David Stuart's previous concerns, expressed in his SEA Screening response (04 February 2022). David noted that the draft plan makes a specific site allocation for development. At that stage in the process, we were worried that there was not sufficient evidence, within the draft neighbourhood plan itself, to reassure us that heritage assets would not be at risk of harm. In particular, we highlighted the proposed site allocation at Cannard's Grave Road, to the west of the development site allocated in the Local Plan. Given this, we supported the view that a full SEA exercise would be required.</p> <p>We think that the Aecom SEA scoping report takes a rigorous approach to the protection of heritage assets. However, I would like to reiterate our previous advice concerning the proposed site allocation at Canard's Grave road. In our view, the Neighbourhood Plan should provide specific evidence that there is little risk of harm to heritage as a result of this new site allocation. To begin with, we would recommend a simple map that identifies the extent of the proposed site allocation, with all local heritage assets marked. Where these heritage assets would appear to be impacted by the development, an evidence-based narrative would be required that justifies the proposed development, and / or conditions put in place that protects any heritage assets potentially at risk of harm.</p> <p>We are pleased to see that the Anglo-Bavarian Brewery (Old Brewery), which is on the Heritage at Risk Register, has now been identified for consideration. I would also like to reiterate our previous advice to consider promoting a more integrated relationship between the grade I listed St Peter and Paul's church and the town centre. Finally, we think that it would also be of benefit to compile a "local list" of heritage assets.</p>	<p>Noted with thanks, the historic environment has been considered through the appraisal, and views are being sought at Regulation 14 consultation with an identified site boundary and supporting assessment work.</p>
<p>Environment Agency Sustainable Places – Planning Advisor (email response received on 9th June 2022)</p> <p>Thank you for referring the above SEA scoping report, which was received 6 May 2022.</p> <p>The Environment Agency supports the SEA Scoping Report, and on the information provided is satisfied that the Shepton Mallet Neighbourhood Plan is unlikely to have a significant effect on the environment. However, we look forward to reviewing further information in due course.</p> <p>In addition, please see the following generic comments which may assist in the formation of the Neighbourhood Plan:</p> <p>The Environment Agency aims to reduce flood risk, whilst protecting and enhancing the water environment. We focus our detailed engagement</p>	<p>Comments noted with thanks, further views are being sought at Regulation 14 consultation.</p>

Consultation response

Considerations

where the environmental risks are greatest, therefore we offer the following advice on this Neighbourhood Plan.

Together with Natural England, English Heritage, and Forestry Commission we have published joint advice on neighbourhood planning which sets out sources of environmental information and ideas on incorporating the environment into plans. This is available at: Planning for the Environment at the Neighbourhood Level.

Flood risk

National and Local Plan Policy approach is to ensure that areas at little or no risk of flooding from any source are developed in preference to areas at higher risk. The aim should be to keep development out of medium and high flood risk areas, and other areas affected by flooding. The plan should also seek flood risk management opportunities (e.g., natural flood management), and to reduce the causes and impacts of flooding (e.g., using sustainable drainage systems and natural flood management in developments).

The latest Local Planning Authorities' Strategic Flood Risk Assessments (SFRAs) should be the primary source of flood risk information in considering whether neighbourhood planning areas may be appropriate for development.

Other important sources include the interactive maps of flood risk available on the Environment Agency's web site. Local Planning Authorities (LPAs) should make available to the Town Councils any reports or information relating to the SFRA and share any other information relevant to flood risk (such as the application of the Sequential and Exception Tests to the Local Plan). There may also be specific issues or local policies, e.g., a Local Flood Risk Management Strategy or Surface Water Management Plan, which should be considered when assessing and managing surface water matters.

If the plan proposes development in flood risk areas, the Sequential Test should be demonstrated and if necessary, the Exception Test applied. Where areas under consideration for development are not consistent with growth identified in the Local Plan, further information will be needed to demonstrate that any development proposed by the neighbourhood plan passes both tests.

Further guidance on the approach to individual development proposals, or where a Neighbourhood Development or Community Right to Build Order is proposed, in an area at risk of flooding can be found at:

<https://www.gov.uk/guidance/flood-risk-and-coastal-change>

Works to any streamside walks may require Land Drainage Consent from the Local Planning Authority.

Biodiversity

The National Planning Policy Framework (NPPF) is clear that pursuing sustainable development includes moving from a net loss of biodiversity to achieving net gains for nature, and that a core principle for planning is that it should contribute to conserving and enhancing the natural environment and reducing pollution.

Similarly, the Government's 25 Year Environment Plan (February 2018) has policy for embedding an 'environmental net gain' principle for development, including housing and infrastructure. Therefore, we expect all plans and policies to demonstrate how they will deliver this principle.

Neighbourhood Plans have the potential to affect biodiversity or geodiversity. They should seek opportunities to work collaboratively with other partners, including Local Nature Partnerships, to develop and deliver a strategic approach to protecting and improving the natural environment based on local priorities and evidence. Equally, they should consider the opportunities that individual development proposals may

Consultation response

Considerations

provide to enhance biodiversity and contribute to wildlife and habitat connectivity in the wider area.

The NPPF states that the planning system should recognise the wider benefits of ecosystem services. Information about ecosystems services is in Biodiversity 2020: A strategy for England's biodiversity and ecosystems services. An Introductory guide to valuing ecosystems services has also been published by Defra along with a practice guide, which could, where appropriate, inform plan-making and decision-taking on planning applications.

The National pollinator strategy: for bees and other pollinators in England should be considered, this is a 10-year plan to protect pollinating insects which support our food production and the diversity of our environment.

Invasive non-native species should be included as an existing biodiversity problem, with the promotion of good and effective biosecurity practices.

The promotion of and adopting of Natural Flood Management methods are encouraged for reasons of improved biodiversity and reduction in flood risk.

Biodiversity enhancement in and around development should be led by a local understanding of ecological networks, and should seek to include:

Habitat restoration, re-creation, and expansion.

Improved links between existing sites.

Buffering of existing important sites.

New biodiversity features within development; and

Securing management for long term enhancement.

Green/blue infrastructure and recreational opportunities

Further guidance can be found at: <https://www.gov.uk/guidance/natural-environment>

Water Quality and Resources

Adequate water and wastewater infrastructure is needed to support sustainable development. A healthy water environment will also deliver multiple benefits, such as helping to enhance the natural environment generally and adapting to climate change. Wastewater infrastructure improvements are particularly encouraged as nutrient enrichment in the surrounding area is particularly sensitive and would be welcomed.

Protecting and improving water bodies may be relevant when drawing up a neighbourhood plan or considering a neighbourhood development order. It is always useful to consult the water company about whether water could be a concern.

We would therefore advise you speak to your local sewerage infrastructure provider to understand any constraints in your local area.

Water efficiency measures should be incorporated into development as this conserves water for the natural environment and allows cost savings for future housing occupants.

Further information can be found at: <https://www.gov.uk/guidance/water-supply-wastewater-and-water-quality>

Water Framework Directive

Reference to the Water Framework Directive (WFD) should be made, the directive should be followed when developing along watercourses.

Nutrients

Phosphates are one of the main reasons water bodies fail WFD status. Therefore, wastewater infrastructure should include practical inclusion of appropriate phosphate / nitrate / nutrient stripping facilities. All new development should be encouraged to be nutrient neutral.

Consultation response

Considerations

Climate Change Strategy

A strategy should be drawn up and embedded within the Plan to set out guidance to deal with the climate emergency and to become carbon neutral as soon as practicable. Innovative methods should be considered and encouraged.

Our soils are one of the biggest carbon sinks available to reduce climate change therefore we suggest the concept of building soil depth and quality could be included. The prevention of further soil depletion through runoff, at the very least, should be included. Sustainable land management practices will play a large role in this.

Green Corridors

The inclusion of aspirations for greening river corridors for biodiversity improvements are encouraged, set back of development would create recreation and access for maintenance benefits. Any lighting should be set back and suitably designed with wildlife in mind.

New development should be encouraged to create green / blue infrastructure and maintain habitats, for example creating wildlife corridors or green space, tree planting etc) and advocating the use of green roofs.

Blue/Green Infrastructure has a real opportunity to link with and deliver against Carbon Net Zero targets. The opportunity for carbon sequestration through wetlands, improved floodplain connection, wet woodlands, etc. should be considered within the approach for carbon net zero development.

Rewilding

Tree planting for rewilding should be encouraged for biodiversity, giving improvements for wildlife and climate change. When planting alongside watercourses access for maintenance must be considered.

Sustainable development

We support sustainable development, in particular the encouragement of resource efficiency, waste minimisation and recycling.

The Neighbourhood Plan should encourage developers to ensure new development is energy / carbon neutral in the future.

Energy levels and water efficiency requirements for new housing to be set up to the equivalent of Level 4 of the Code for Sustainable Homes.

The concept of Water Sensitive Urban Design (WSUD) is encouraged, and the following CIRIA guidance document provides useful information on the concept and how to apply it in urban planning - [wsud_ideas_book.pdf](#) ([susdrain.org](#))

Further advice on the production of Neighbourhood Plans can be found at the Planning Advisory Service function of the Local Government Association, which has detailed advice on neighbourhood planning.

Natural England

Planning Lead Advisor – Wessex Team

(email response received on 14th June 2022)

Thank you for your consultation on the above dated 06 May 2022.

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.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish / Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England agrees with the proposed scope of the Strategic Environmental Assessment for Shepton Mallet Neighbourhood Plan.

Comments noted with thanks, further views are being sought at Regulation 14 consultation.

Consultation response

Considerations

Based on our records and the material provided, the baseline information and issues identified in the SEA Scoping Report appear to demonstrate a good understanding of the neighbourhood plan area with respect to other relevant aspects of the natural environment and to the wider context in which the Plan is being prepared, including relevant national and local planning policy.

Strategic Environmental Assessment & Habitats Regulations Assessment

Where a Neighbourhood Plan requires an Appropriate Assessment under the Habitats Directive, Article 3.2 of the SEA Directive also requires a SEA to be undertaken. Where a SEA is required it should be prepared in accordance with regulation 12 of the SEA Regulations. The SEA must cover all environmental effects identified in the HRA.

Key issues

The following key issues for each of the SEA themes that form the SEA framework were identified through scoping

Biodiversity

- A supporting HRA will be undertaken to understand the potential effects arising at internationally designated biodiversity sites and any mitigation that may be required to avoid significant effects. The HRA will inform both plan-making and the SEA.
- There is a network of protected and non-protected habitats within and surrounding the neighbourhood area, including SSSIs, ancient woodland, and priority habitats. Planning for development should seek to avoid direct impacts for habitats, such as habitat loss or fragmentation. Alternatively, much of the landscape surrounding the settlement is recognised for its potential to support primary habitats through habitat re-creation, new habitats, and enhanced green infrastructure, and planning for development can seek to maximise opportunities arising in this respect.
- Larger scale development in the north of the neighbourhood area may be required to consult with Natural England regarding impacts arising for nearby SSSIs.

Climate change and flood risk

- Whilst there are areas of high and medium fluvial flood risk, these predominantly follow the course of the River Sheppey and can be largely avoided through development of an appropriate spatial strategy. Surface water flood risk is more prevalent through the neighbourhood area, and whilst planned development should be expected to mitigate any impacts arising, any opportunities for betterment should also be sought.
- Opportunities to influence per capita emissions could be sought the SMNP process, particularly by planning for integrated and connected development, which reduces the need to travel and supports opportunities to travel by more sustainable modes.
- Opportunities to enhance the resilience of the both the neighbourhood area and its residents, to the effects of climate change should be sought. This

can include adaptation strategies, green infrastructure enhancement, flood betterment measures, infrastructure development, and increased renewable energy sources.

Community wellbeing

- The population is steadily increasing, and there is a need to identify a land supply for future housing growth as part of planned and coordinated development. Planning policies can also support development that delivers a range of housing types, tenures, and sizes, to meet the varying needs of residents.
- The 2019 IMD indicates that different levels and types of deprivation are experienced across the neighbourhood area. As such, the SMNP should seek an approach that does not exacerbate deprivation, and where possible reduces barriers within certain deprivation domains.
- With a range of existing services and facilities within the SMNP area, there should be good opportunity to deliver connected development which reduces the need to travel.
- As the requirements of the working population continue to change, there is likely to be a greater need for adaptable dwellings that can accommodate flexible working practices which might include co-working facilities or hubs.

Historic environment

- With a wealth of both designated and non-designated heritage assets within and surrounding the neighbourhood area, development of the SMNP provides an opportunity to deliver a spatial strategy that avoids or minimises impacts for the historic environment.
- Development of the SMNP provides an opportunity to develop the existing evidence base in relation to the historic environment, especially in terms of considering new evidence emerging or changes that have occurred since the production of the last Shepton Mallet Conservation Area Appraisal in 2007.
- During the subsequent stages of the SEA process, the Somerset HER will need to be reviewed in greater detail to determine the potential impacts of the SMNP on non-designated features.
- There is notably an identified heritage asset 'at risk' within the neighbourhood area. Any opportunity to restore or support appropriate management plans for the conservation of this asset should be explored. Further opportunities to improve the public realm and green infrastructure, to the indirect benefit of heritage settings, should also be recognised and promoted.

Land, soil, and water resources

- The provisional ALC data indicates the neighbourhood area is underlain with significant areas of Grade 3 agricultural land. However, the data does not differentiate between Grade 3a and Grade 3b land. As a finite resource, Grade 3a (best and most versatile) should be protected where possible.

Opportunities to investigate and identify more precise ALC data should be sought where possible.

- The Sheppey Water Body is the only watercourse in the SMNP area, running through the centre of the parish and the town of Shepton Mallet. Development should avoid impacts to water quality for both the River Sheppey and within the identified groundwater source protection zones.
- The SMNP should seek an appropriate spatial strategy which avoids conflict with the mineral safeguarding area in the northern part of the parish and ensures that development does not hinder any potential future abstraction in this location.

Landscape

- There are a range of landscape features present within the neighbourhood area which contribute to the character and quality of the landscape. These features should be protected and enhanced where possible through the plan process, including the identification of an appropriate, low-impact spatial strategy.

Transportation and movement

- There are no train stations within the neighbourhood area; the nearest stations being Castle Cary and Bruton. As such, public transport in the area is limited to several bus services. These services are regular and provide access to a variety of destinations in the local area, including Frome, Street, and Bath, and new development should aim to connect well with these services.
- There are numerous PRoW in the neighbourhood area, including a section of the East Mendip Way. Development should seek to connect with and where possible extend PRoW and maximise opportunities for active travel.
- The recovery from the COVID-19 pandemic has the potential to change travel patterns in the short, medium, and longer term. Development should seek to enhance local connections in response to changing local demands.