

Duston Neighbourhood Plan: Determination Statement

Strategic Environmental Assessment & Habitats Regulation Assessment

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Executive Summary

This statement sets out the reasons for the Council's determination that the draft Duston Neighbourhood Plan is unlikely to result in significant environmental effects and therefore does not require a strategic environmental assessment. In addition this statement determines that the Duston Neighbourhood Plan is not likely to result in significant effects on any European site. Consequently, the Duston Neighbourhood Plan does not require Habitats Regulation Assessment.

This determination statement is intended to support Duston Parish Council in demonstrating that the Duston Neighbourhood Plan is compatible with certain European Union obligations as required by the *basic conditions*, namely:

- Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment; and
- Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora.

Northampton Borough Council will publicise this determination statement in accordance with its regulatory requirements.

1. Context

Neighbourhood Plans and the requirements for Strategic Environmental Assessment (SEA) & Habitats Regulation Assessment (HRA)

1.1. Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004) sets out the basic conditions which a draft Neighbourhood Plan must meet in order to proceed to referendum. This includes ensuring that the neighbourhood plan does not breach, and is otherwise compatible with European Union obligations. Of particular relevance are:

- *Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment, transposed into UK law by The Environmental Assessment of Plans and Programmes Regulations 2004 (hereafter referred to as the “SEA regulations”); and*
- *Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora, which was initially transposed into UK law by The Conservation (Natural Habitats, &c.) Regulations 1994 with various amendments consolidated by The Conservation of Habitats and Species Regulations 2010 (hereafter referred to as the “Habitats regulations”).*

Circumstances where SEA & HRA may be required

1.2. The National Planning Practice Guidance (NPPG) (para. 027) recognises that where a neighbourhood plan is likely to have significant environmental effects, it may require a strategic environmental assessment (SEA). The NPPG suggests that draft neighbourhood plan proposals should be assessed to determine whether the plan is likely to have significant environmental effects through a screening process.

1.3. Whether a neighbourhood plan requires a strategic environmental assessment, and (if so) the level of detail needed, will depend on what is proposed in the draft neighbourhood plan (NPPG para. 046). The NPPG (para. 046) suggests that strategic environmental assessment may be required, for example, where:

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

1.4. The Habitats regulations (reg. 61) require appropriate assessment (or *Habitats Regulation Assessment* (HRA)) where the plan is likely to have a significant effect on a European site or a European offshore marine site (either alone or on combination with other plans or projects). Protected European Sites include:

- Special Protection Areas (SPAs);
- Special Areas of Conservation (SACs); and
- Ramsar sites.

Purpose of determination statement

1.5. Following earlier screening assessment of the emerging Duston Neighbourhood Plan, this determination statement fulfills the requirements of the SEA regulations (Reg. 9), namely through determining whether the Duston Neighbourhood Plan is likely to have significant effects on the environment by setting out the reasons for determination.

1.6. A copy of the determination statement will be sent to each of the consultation bodies within 28 days of completion.

2. Preparation of Duston Neighbourhood Plan and SEA & HRA Screening Process

2.1. Duston Parish Council undertook a four-stage process in preparing the Neighbourhood Plan. The SEA & HRA screening process was undertaken alongside the preparation of the Duston Neighbourhood Plan.

Stage 1: Early engagement & collection of baseline information

2.2. In 2013, Duston Parish Council established a Steering Group of local volunteers, parish councillors and parish council staff to prepare a Neighbourhood Development Plan on its behalf. An application to designate the parish of Duston as a Neighbourhood Area was submitted to Northampton Borough Council in May 2013. The Neighbourhood Area was formally designated in September 2013. Throughout 2013 and early 2014, steering group meetings were held to progress the plan and collect evidence. Community consultation and awareness raising activities were carried out to identify locally important planning issues and to engage local people in the neighbourhood planning process.

2.3. At this stage, early baseline information was collected to inform the SEA & HRA screening process.

Stage 2: Issues & Options & SEA/HRA Screening Report

Duston's Future Report

2.4. In May 2014, Duston Parish Council published the "Duston's Future" report for public consultation. The Duston's Future report consisted of an annotated questionnaire document accompanied by a background paper. This explored planning issues affecting Duston parish and presented possible policy options, alongside a vision and objectives based on early consultation. This non-statutory consultation document was prepared for the purposes of enabling early consultation and engagement to inform the preparation of a pre-submission neighbourhood plan, and was distributed to households and businesses within the community and to technical stakeholders.

2.5. The NPPG (para. 029) recognises the importance of commencing SEA at an early stage in the plan-making process. This is to ensure the process of assessment and plan preparation are integrated, enabling the assessment process to inform the choices being made in the plan. The Duston's Future report formed the basis for SEA & HRA screening assessment. The screening assessment was presented in the "*Duston Neighbourhood Plan Screening Report for: a) Strategic Environmental Assessment; and b) Habitats Regulation Assessment (July 2014)*" (hereafter referred to as the *Screening Report*). The Screening Report is included in Appendix A.

2.6. The Screening Report identified that the proposed neighbourhood plan objectives and policy options were not expected to bring about likely significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the JCS.

The Screening Report noted that the policies of the JCS had been subject to HRA and concluded that no likely significant effects will occur as a result of the implementation of the draft policy options either alone or in combination.

2.7. Based on the findings of a screening assessment, the Screening Report concluded that the Duston Neighbourhood Plan would not require a full SEA or HRA.

Publication of the Screening Report

2.8. In July 2014, the Screening Report was sent to the consultation bodies and other technical stakeholders for their consideration. Responses were received from Natural England, English Heritage and the Borough Council of Wellingborough. Responses received during publication of the Screening Report is reproduced in Appendix B.

2.9. A summary of responses is as follows:

- Natural England agreed with the report's conclusions that the Duston Neighbourhood Plan would not be likely to result in a significant effect on any European Site, in particular the Upper Nene Valley Gravel Pit Special Protection Area, either alone or in combination and therefore no further assessment work would be required. Natural England also concurred that it is unlikely that any significant environmental effects will result from the implementation of the Duston Neighbourhood Plan that were not considered and dealt with by the Sustainability Appraisal of the emerging West Northamptonshire Joint Core Strategy.
- English Heritage concurred with the Screening Report that the preparation of a SEA is not required in terms of cultural heritage impacts.
- Borough Council of Wellingborough confirmed that they had no additional comments to make in respect of the Screening Report.

2.10. Based on the comments received in response to the Screening Report, no further action was required.

Stage 3: Pre-submission Neighbourhood Plan (Reg. 14)

Pre-submission Neighbourhood Plan

2.11. The results of the Duston's Future consultation and conclusions of the Screening Report directly informed the preparation of the Pre-submission Neighbourhood Plan (PSNP). The PSNP set out draft policies which relate to a range of themes including:

- Housing;
- Built environment;
- Transport;

- Business;
- Open space and recreation; and
- Community facilities and education.

2.12. The PSNP was published for public consultation in accordance with Reg. 14 between November 2014 and January 2015. A newsletter was distributed to all households and local businesses to notify of the publication of the PSNP. Electronic copies of the PSNP, supporting documents and questionnaire were published online and emailed to technical stakeholders.

2.13. The earlier Duston's Future Report included a range of policy options which were assessed in the Screening Report. Through preparing the PSNP, the Steering Group refined the policy options and developed draft policies and proposals. The draft policies and proposals provided greater clarity about the likely approach of the Duston Neighbourhood Plan.

2.14. An assessment was undertaken to consider the draft neighbourhood plan policies and proposals and was presented in the *SEA & HRA Screening Report Update Statement (November 2014)* (the "Update Statement"). The assessment in the Update Statement considered the extent to which the draft policies and proposals were aligned with the policy options considered in the earlier screening assessment. The Update Statement is presented in Appendix C.

2.15. The Update Statement concluded that the draft PSNP policies and proposals directly relate to the objectives and policy options which were assessed in the screening report published in July 2014. Therefore the findings of the earlier screening report (July 2014) remain relevant.

Publication of the Update Statement

2.16. In November 2014, the Update Statement was published for consultation. Responses were received from English Heritage, Natural England and the Environment Agency. The responses received are published in full in appendix D. In summary, the following responses received:

- English Heritage concurred with the Update Statement that the preparation of a SEA is not required in terms of cultural heritage impacts.
- Natural England confirmed that they had no further comments to make regarding the Update Statement (therefore the earlier response remained relevant, which stated that no further assessment work would be required).
- Environment Agency reviewed the information and considers that the Duston Parish Neighbourhood Plan is unlikely to result in significant environmental impacts, thereby suggesting that SEA & HRA are not required.

- 2.17. Following comments received during publication of the report it is considered that no further action is required in respect of either SEA or HRA. This determination is discussed in more detail in section 3.

Stage 4: Plan Proposal (Reg. 15)

- 2.18. Informed by consultation on the PSNP and the findings of the Update Statement, the steering group has prepared a Neighbourhood Plan Proposal. On 23 February 2015, Duston Parish Council submitted the plan proposal to Northampton Borough Council for examination, in accordance with Reg. 15. This determination statement has been prepared alongside the Plan Proposal.
- 2.19. The table in Figure 1 outlines the main stages of the preparation of the Duston Neighbourhood Plan and SEA & HRA screening process.

Figure 1: Relationship between Duston Neighbourhood Plan preparation and SEA & HRA Screening Assessment

Date	Stage of Plan Preparation	Description & Key Consultation	SEA & HRA Screening Process
Spring 2013 – June 2014	Early engagement and evidence-gathering	Steering group meetings and workshops were held to progress the Neighbourhood Plan and gather evidence. Community consultation events engaged the local community and identified local planning issues.	Collection of baseline information.
May - August 2014	“Duston’s Future” Issues & Options report consultation	Non-statutory consultation on issues and options. A copy of the Duston’s Future report was sent to all households in the Duston community and to various technical stakeholders.	The objectives and policy options identified in the Duston’s Future report were assessed against the criteria for SEA & HRA. The SEA & HRA Screening Report was published for consultation.
November 2014 – January 2015	Pre-submission Neighbourhood Plan (Reg. 14)	Statutory pre-submission consultation and publicity. A newsletter was posted to all households in Duston, with copies of the PSNP made available at local venues. A range of consultation events and exhibitions were held. Electronic copies of the PSNP were emailed to technical stakeholders with online questionnaire.	The Pre-submission Neighbourhood Plan set out draft planning policies. A SEA & HRA Screening Report Update Statement was prepared in order to consider the draft policies, taking into account the findings of the earlier screening assessment and the responses received during consultation. The Update Statement was published for consultation.
February 2015	Submission of Plan Proposal (Reg. 15)	On 23 February 2015, Duston Parish Council submitted the plan proposal to Northampton Borough Council for examination.	This Determination Statement has been prepared based on earlier screening assessment and a response received during consultation and is published in accordance with Reg. 11.

3. Determination

Policy Context

- 3.1. At the time at which the Screening Report (July 2014) was prepared, the West Northamptonshire Joint Core Strategy (JCS) had been examined. The Inspector's Report was subsequently published and determined the JCS to be sound, subject to modifications.
- 3.2. The JCS was adopted by Northampton Borough Council in December 2014. As part of Northampton's Development Plan, the JCS provides an up-to-date strategic policy framework which makes provision for the scale and distribution of new homes, jobs and other development across the West Northamptonshire sub-region. Throughout its preparation, the JCS was subject to Strategic Environmental Assessment through a process of Sustainability Appraisal.

Screening Report (July 2014) and Update Statement (Nov 2014)

- 3.3. The Screening Report (July 2014) included an appraisal of the proposed neighbourhood plan objectives and policy options in the context of the objectives and policies of the (then emerging) JCS. In addition the assessment considered the likely effects of those objectives and policy options on European Sites including the Upper Nene Valley SPA in relation to disturbance; water levels; water quality and pollution. In addition to considering the policy context of the JCS, the Screening Report had regard to other plans and strategies in the locality to identify 'in combination' effects.
- 3.4. The Screening Report (July 2014) determined that the proposed Neighbourhood Plan objectives and policy options were likely to be in general conformity with the strategic policies of the JCS. No likely significant negative effects were identified in terms of SEA or HRA.
- 3.5. The Update Statement (Nov 2014) was prepared in order to consider the draft policies and proposals published in the Pre-submission Duston Neighbourhood Plan. The assessment explored the extent to which the draft policies and proposals reflected the policy options tested by the earlier screening assessment (July 2014). The Update Statement (Nov 2014) confirmed that the draft policies and proposals were aligned with the earlier policy options, therefore concluding that the findings of the Screening Report (July 2014) remained relevant.

Publication

- 3.6. The Screening Report (July 2014) and Update Statement (Nov 2014) were published for consultation by Northampton Borough Council. Responses received from the consultation bodies (English Heritage, Natural England and Environment Agency) concurred with the findings of the Screening Report and Update Statement.

Analysis

- 3.7. The JCS outlines the scale and distribution of new housing required in Northampton, including 3,250 dwellings within existing urban areas. In addition, the JCS seeks to provide a minimum net increase of 28,500 jobs in the period 2008 to 2029. Duston is a predominantly urban/suburban parish; the opportunities for new development are therefore considered modest, relative to the overall scale of growth set out by the JCS.
- 3.8. The Duston Neighbourhood Plan Proposal creates opportunities for new development. This includes enabling residential development of remaining undeveloped land at the former British Timken site, which could provide in the region of 200 dwellings. The Plan Proposal also sets out policies to influence the development of smaller infill sites, extensions, conversions and alterations. In addition the provision of retail, services and community facilities are directed toward the village centre and other local centres. Existing open spaces and community facilities will be retained, protected and enhanced where possible.
- 3.9. New development which takes place in Duston is expected to contribute to the housing and jobs requirement set out by the JCS. Whilst it is difficult to quantify the amount of development likely to be brought about by the Duston Neighbourhood Plan, it is not expected to be of such a scale or type to deviate from the strategic approach set out by the JCS.
- 3.10. The JCS was subject to a full SEA/SA which considered and addressed significant effects which could arise through the plan's implementation. The Screening Report (July 2014) and Update Statement (Nov 2014) concluded that the draft policies and proposals are broadly aligned with the strategic policy framework set out by the JCS. The assessment concluded that significant environmental effects that have not already been considered and dealt with through a sustainability appraisal of the JCS are not expected to arise as a result of the implementation of the Duston Neighbourhood Plan. The findings of the assessment were supported by the consultation bodies.
- 3.11. The JCS has been tested through the HRA process and found to have no likely significant effects on designated sites, including the Upper Nene Valley SPA. Potential development sites in Duston are neither physically connected, nor in close proximity to the Upper Nene Valley SPA and are therefore not expected to increase harm from visitor disturbance. New developments coming forward as a result of the policies of the Neighbourhood Plan are required to achieve the sustainable development principles described in JCS policy S10 to maintain water levels and quality. The Duston Neighbourhood Plan policies and proposals are not expected to result in likely significant effects, and therefore HRA is not required. Relevant responses received during consultation supported the findings of the Screening Report and Update Statement.

Conclusions

3.12. In conclusion, the implementation of the Duston Neighbourhood Plan is not expected to result in likely significant effects which have not been addressed through either SEA or HRA of the JCS. The Screening Report (July 2014) and Update Statement (Nov 2014) determined that the Duston Neighbourhood Plan does not require a full SEA or HRA. This view has been supported by the consultation bodies. Consequently, the Duston Neighbourhood Plan has not been subject to Strategic Environmental Assessment or Habitats Regulation Assessment.

**Appendix A - Duston Neighbourhood Plan Screening Report
for: a) Strategic Environmental Assessment; and b) Habitats
Regulation Assessment (July 2014)**

Document available to download from: <http://www.northampton.gov.uk/duston-np>

Appendix B – Publication of Duston SEA & HRA Screening Report: responses received (July – August 2014)

Consultation body	Response	Actions required
<p>English Heritage</p> <p>25/07/14</p>	<p>Screening Report for Strategic Environmental Assessment and Habitats Regulation Assessment – Duston Parish Council</p> <p>Thank you for your email dated 1st July 2014 consulting English Heritage on the above report.</p> <p>For the purposes of this consultation, English Heritage will confine its advice to the question, “Is it likely to have a significant effect on the environment?” in respect of our area of concern, cultural heritage. Your e-mail also states that we are invited to comment on the screening report, principally in terms of whether SEA and or HRA is required. Again, our area of concern is cultural heritage.</p> <p>Our comments are based on the information supplied with the Screening Report. It is for the Council to make the final decision in terms of whether Strategic Environmental Assessment (SEA) is required.</p> <p>The Screening Report indicates in Table 2 on Page 12 that in answer to the question above, “No likely significant effects on the environment have been identified.”</p> <p>It continues, with regard to the screening outcome, to state that:</p> <p>“As a result of the assessment in section 4, it is considered unlikely that any significant environmental effects will occur from the implementation of the DNP that were not considered and dealt with by the Sustainability Appraisal of the emerging West Northamptonshire Joint Core Strategy. As such the Duston Neighbourhood Plan does not require a full SEA to be undertaken.”</p> <p>At Appendix 2, the Screening Assessment, having made reference to the Heritage objectives of the Duston Neighbourhood Plan and the emerging Joint Core Strategy Development Plan Document (JCS DPD) states that:</p> <p>“The proposed objectives and policy options are expected to comply with the policies of the JCS. Therefore no likely significant effects are identified in relation to the SEA criteria.”</p> <p>On the basis of the information supplied, and in the context of the criteria set out in Schedule 1 of the Environmental Assessment Regulations [Annex</p>	<p>No direct actions arising. Regard will be had to comments received from other consultation bodies, as highlighted by EH.</p> <p>With reference to EH’s advice on local and archaeological staff, both Northampton Borough Council and Northamptonshire County Council were consulted through preparation of the Duston Neighbourhood Plan.</p>

	<p>II of 'SEA' Directive], English Heritage concurs with the Screening Report that the preparation of a SEA is not required in terms of cultural heritage impacts.</p> <p>The views of other statutory consultation bodies should be taken into account before the overall decision on the need for a SEA is made. I should be pleased if you can send a copy of the determination as required by Regulation 11 of the Environmental Assessment of Plans and Programmes Regulations 2004.</p> <p>We should like to stress that this opinion is based on the information provided by you with your email. To avoid any doubt, this does not reflect our obligation to provide further advice on later stages of the SEA process and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the plan/guidance) where we consider that, despite the absence of SEA, there would be an adverse effect upon the environment.</p> <p>As the government's principal adviser on the historic environment, English Heritage has produced a number of documents relating to neighbourhood planning. The Parish Council may find these documents helpful in identifying what it is about there area which makes it distinctive and how they might go about ensuring that the character of the area is retained. These can be found at:-</p> <p>www.english-heritage.org.uk/professional/advice/hpg/historicenvironment/neighbourhoodplanning/</p> <p>We also advise that the conservation and archaeological staff of the Borough and County Councils are involved in the preparation of the Neighbourhood Plan and its assessment. They are best placed to advise on local historic environment issues</p> <p>Please do not hesitate to contact me if you wish to discuss any of these comments.</p> <p>Yours sincerely</p>	
<p>Natural England 21/07/14</p>	<p>Planning consultation: Duston Neighbourhood Plan – Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment (HRA) Screening Report</p> <p>Thank you for your consultation on the above document which was received by Natural England on 07 July 2014</p>	<p>Comments noted. None required.</p>

	<p>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.</p> <p>Natural England welcomes the Screening Report which assesses the requirement for Strategic Environmental Assessment (SEA) and Habitat Regulations Assessment HRA for the Duston Neighbourhood Plan.</p> <p>I can confirm that Natural England agrees with the report's conclusions that the Duston Neighbourhood Plan would not be likely to result in a significant effect on any European Site, in particular the Upper Nene Valley Gravel Pit Special Protection Area, either alone or in combination and therefore no further assessment work would be required.</p> <p>In addition we also concur that it is considered unlikely that any significant environmental effects will result from the implementation of the Duston Neighbourhood Plan that were not considered and dealt with by the Sustainability Appraisal of the emerging West Northamptonshire Joint Core Strategy.</p> <p>We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.</p> <p>For any queries relating to the specific advice in this letter only please contact Roslyn Deeming on 0300 060 1524. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.</p> <p>We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.</p> <p>Yours sincerely</p>	
<p>Environment Agency</p>	<p><i>No response was received from the Environment Agency.</i></p>	<p><i>N/a</i></p>
<p>Borough Council of Wellingborough 25/07/14</p>	<p>Thank you for consulting us on the Screening Report.</p> <p>I can confirm we have no comments to make.</p> <p>Regards</p>	<p>Comments noted. No action required</p>

Appendix C - Duston SEA & HRA Screening Report Update Statement (November 2014)

Document available to download from: <http://www.northampton.gov.uk/duston-np>

Appendix D – Publication of Duston SEA & HRA Screening Report Update Statement: responses received (Nov 2014 – Jan 2015)

Consultation body	Response	Actions required
<p>English Heritage</p> <p>18/12/14</p>	<p>Duston Neighbourhood Plan: Strategic Environmental Assessment & Habitats Regulation Assessment Update Statement – November 2014</p> <p>Thank you for your email dated 25th November 2014 consulting English Heritage on the above report.</p> <p>For the purposes of this consultation, English Heritage will confine its advice to the question, “Is it likely to have a significant effect on the environment?” in respect of our area of concern, cultural heritage.</p> <p>Your e-mail also states that we are invited to comment on the Update Statement principally in terms of whether the Duston Neighbourhood Plan requires a Strategic Environmental Assessment and / or Habitats Regulation Assessment. We understand the SEA & HRA Screening Assessment Update Statement has been published in parallel with the publication of the pre-submission Duston Neighbourhood Plan.</p> <p>Our comments are based on the information supplied with the Update Statement. It is for the Council to make the final decision in terms of whether Strategic Environmental Assessment (SEA) is required.</p> <p>We note the Update Statement’s conclusion that:</p> <p>‘...the implementation of the Duston Neighbourhood Plan is not expected to result in significant effects which have not been addressed through either SEA or HRA of the JCS. Following this screening assessment Update Statement it is concluded that the Duston Neighbourhood Plan does not require a full Strategic Environmental Assessment or Habitats Regulation Assessment.’</p> <p>On the basis of the information supplied, and in the context of the criteria set out in Schedule 1 of the Environmental Assessment Regulations [Annex II of ‘SEA’ Directive], English Heritage concurs with the Update Statement that the preparation of a SEA is not required in terms of cultural heritage impacts.</p> <p>The views of other statutory consultation bodies should be taken into account before the overall decision on the need for a SEA is made. I should be pleased if you can send a copy of the determination as required by Regulation 11 of the Environmental Assessment of Plans and Programmes Regulations 2004.</p>	<p>No direct actions arising. Regard will be had to comments received from other consultation bodies, as highlighted by EH.</p> <p>With reference to EH’s advice on local and archaeological staff, both Northampton Borough Council and Northamptonshire County Council were consulted through preparation of the Duston Neighbourhood Plan.</p>

	<p>We should like to stress that this opinion is based on the information provided by you with your email. To avoid any doubt, this does not reflect our obligation to provide further advice on later stages of the SEA process and, potentially, object to specific proposals which may subsequently arise (either as a result of this consultation or in later versions of the plan/guidance) where we consider that, despite the absence of SEA, there would be an adverse effect upon the environment.</p> <p>As the government’s principal adviser on the historic environment, English Heritage has produced a number of documents relating to neighbourhood planning. The Parish Council may find these documents helpful in identifying what it is about there area which makes it distinctive and how they might go about ensuring that the character of the area is retained. These can be found at:-</p> <p>www.english-heritage.org.uk/professional/advice/hpg/historicenvironment/neighbourhoodplanning/</p> <p>We also advise that the conservation and archaeological staff of the Borough and County Councils are involved in the preparation of the Neighbourhood Plan and its assessment. They are best placed to advise on local historic environment issues</p> <p>Please do not hesitate to contact me if you wish to discuss any of these comments.</p> <p>Yours sincerely</p>	
<p>Natural England 18/12/14</p>	<p>Thank you for consulting Natural England on the Update Statement of the HRA/SEA screening report for Duston Neighbourhood Plan. I note that our comments on the previous consultation on the screening reports have been included in this latest document and I can confirm that we have no further comments to make on this Update Statementd version. We have received the consultation on the Pre-submission Neighbourhood Plan from Duston Parish Council and we will respond to this separately.</p> <p>If there is anything further that you would like to discuss on this matter please do not hesitate to contact me.</p>	<p>Comments noted. No action required.</p>
<p>Environment Agency 09/01/15</p>	<p>SEA and HRA screening for Duston Parish Neighbourhood Plan</p> <p>Thank you for referring the SEA and HRA screening Report for the Duston Parish Neighbourhood Plan, which was received on 25 November 2014.</p> <p>We have reviewed the information submitted and consider the Duston Parish Neighbourhood Plan is unlikely to result in significant environmental impacts.</p>	<p>Comments noted. No action required.</p>

As the plan is required to be in general conformity with the West Northamptonshire Joint Core Strategy, we do not consider that we are able to provide you with further advice at this stage until we are consulted on individual planning applications by your Authority. However, we can offer the following comments which may be of use.

Plan Area Constraints

The Plan area falls mostly within Flood Zone 1, defined by the National Planning Policy Framework (NPPF) as having a low probability of flooding. Drainage from new development must not increase flood risk either on-site or elsewhere. Government policy strongly encourages a sustainable drainage system (SuDS) approach to achieve these objectives. Guidance on how to address specific local surface water flood risk issues may also be available through the Strategic Flood Risk Assessment or Surface Water Management Plans produced by your Authority.

Preliminary Opinion

We are able to provide a free preliminary opinion to a developer/applicant per site. This will outline our position and highlights any key environmental risks that we are concerned about as a statutory consultee and provide developers with an idea of what we would expect to receive within a planning application.

Charged Service for Planning Advice

If further bespoke advice is required outside of a formal planning application then this will form part of our charged for planning advice service.

Please note that this response is based on the information provided at this time and if this changes in the future we would need to consider our position again. We trust that the above information is of assistance.

If you would like to discuss our response further, or would like more information about our charged for planning advice service, please do not hesitate to contact me.

Yours faithfully