

# Strategic Environmental Assessment (SEA) for the Berwick-upon-Tweed Neighbourhood Plan

Environmental Report

February, 2022

## Quality information

Version		Prepared by	Checked by	Approved by
V1	For client review	Omar Ezzet Graduate Consultant	Ian McCluskey Associate Director	Ian McCluskey Associate Director

Prepared for:

Berwick-upon-Tweed Town Council

Prepared by:

AECOM Limited

1 New York St,

Manchester M1 4HD

United Kingdom

T: +44 (161) 601 1700

[www.aecom.com](http://www.aecom.com)

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## Non-Technical Summary

### What is strategic environmental assessment?

A strategic environmental assessment has been undertaken to inform the Berwick-upon-Tweed Neighbourhood Plan (BNP) as required by the SEA Regulations.

Neighbourhood Plan groups use SEA to assess Neighbourhood Plans against a set of sustainability / environmental objectives, developed in consultation with interested parties. The purpose of the assessment is to avoid adverse environmental and socio-economic effects through the Neighbourhood Plan. SEA also helps identify opportunities to improve the environmental quality of the NP area and the quality of life for residents.

### What is the Berwick-upon-Tweed Neighbourhood Plan?

The Berwick-upon-Tweed Neighbourhood Plan presents a plan for the administrative area of the civil parish of Berwick-upon-Tweed, for the period 2019-2036. Prepared to be in conformity with the saved policies of the Berwick-upon-Tweed Local Plan (1999). The BNP has also been informed by the emerging Berwick-upon-Tweed Local Plan which is currently undergoing examination. The BNP sets out a vision and a range of policies for the Neighbourhood Plan area, including protection and enhancement of the historic and natural environment, protection and enhancement of community facilities and support for the economy and thriving communities.

### Purpose of the Environmental Report

The Environmental Report, which accompanies the current consultation on the BNP, is the second document to be produced as part of the SEA process. The first document was the SEA Scoping Report (November 2020), which includes information about the Neighbourhood Plan area's environment and community.

The purpose of the Environmental Report is to:

- Identify, describe and evaluate the likely significant effects of the BNP and alternatives; and
- Provide an opportunity for consultees to offer views on any aspect of the SEA process which has been carried out to date.

The Environmental Report contains:

- An outline of the contents and main objectives of the BNP and its relationship with other relevant policies, plans and programmes.
- Relevant aspects of the current and future state of the environment and key sustainability / environmental issues.
- The SEA Framework of objectives against which the BNP has been assessed.
- The appraisal of alternative approaches for the BNP.
- The likely significant environmental effects of the BNP.

- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects as a result of the BNP; and
- Potential monitoring measures.

## Scoping

The scoping stage involves the collection of information relating to:

- the state of the environment in the plan area; *and*
- relevant objectives and targets set out within plans, policies and programmes.

This information allowed for a range of key issues to be identified, and to establish what topics should be the focus of the SEA. The scoping process led to the following topics being scoped in or out of the SEA. These topics then formed the basis of a SEA Framework, which is the basis for appraising the Plan (and reasonable alternatives).

- Air Quality – **Scoped out**
- Biodiversity – **Scoped in**
- Climatic factors; mitigation **Scoped out** , adaptation - **Scoped in**
- Historic environment – **Scoped in**
- Landscape – **Scoped in**
- Land, soil and water resources – **Scoped out**
- Population and housing – **Scoped in**
- Health and wellbeing – **Scoped out**
- Transportation – **Scoped out**

## Assessment of alternative approaches for the BNP

The NP group did not consider allocating further growth in addition to that set out at strategic level in the emerging NLP. As the draft NP does not allocate sites for employment or residential development there are no reasonable alternative to consider in terms of site allocations.

One reasonable alternative considered in the SEA process pertains to BNP policies BNDP6 (Local Green Space) (LGS) and BNDP7 (Protected Open Space). BNDP6 designates 16 sites in the NP area as LGS and BNDP6 allocates a further 7 sites as Protected Open Space. The emerging NLP's policy INF5 (Open space and facilities for sport and recreation) creates a specific designation of Protected Open Space which seeks to retain existing areas of open space within Northumberland. The supporting text to policy states that *'whilst the opportunity to create Local Green Space through the Local Plan exists, the County Council considers that, given the need to show that any such designation is demonstrably special to a local community, the most appropriate mechanism for designating Local Green Space is through a neighbourhood plan.'* Under the policy development likely to result in loss of protected open space will not be supported unless it meets a set of criteria. These include, inter alia, the provision of a replacement area of space of equivalent or better quality, in a suitable location, or where the development proposed is for alternative sports and

recreation, the needs for which, outweigh the loss. Engagement on the emerging NP has identified that the distinctiveness of the plan area is hugely valued by the local community. Therefore, the BNP designates areas of Local Green Space seeking to protect these areas which contribute to the character and the landscape in Berwick-upon-Tweed and are valued by the community. A further 7 sites (not included in the NLP's POS list) were also identified as valued open spaces by the community but do not meet the requirements for the LGS designation. These are designated as POS instead in Policy BNDP7. The 16 LGS sites in BNDP6 are designated in the emerging NLP as POS. The 7 POS sites in BNDP7 are not designated as POS in the NLP. The LGS and POS sites are listed in Table 0-1.

The SEA considered the reasonable alternative of not designating the 16 LGS and 7 POS sites in the BNP, as the LGS sites would be offered a degree of protection, at strategic level, through the emerging NLP as POS.

In conclusion there are two reasonable alternatives pertaining to open space designation.

**Option 1:** Given the importance of the identified sites in Table 0-1, to the community, they should be designated as LGS as they meet the requirements for LGS designation (as assessed by the BNP). The remaining sites, also identified as important to the community, but which do not meet the LGS designation requirements, are designated as POS to safeguard them from future development.

**Option 2:** Retain the emerging Local Plan's protection of the sites as POS as this offers a degree of protection to the sites and do not designate further POS sites.

**Table 0-1 Local Green Space & Protected Open Space Sites**

BNDP site Ref.	Name
Local Green Space Sites	
LGS01	Castle Dene Park, Castlegate;
LGS02	Castle Vale Park;
LGS03	Bell Tower Park;
LGS04	Magdalene Fields;
LGS05	Flagstaff Park;
LGS06	Five Arches Public Park, Pleasure and Recreation Ground;
LGS07	Dock Road, Tweedmouth;
LGS08	War Memorial Garden, Main Street, Spittal;
LGS09	Promenade, Spittal;
LGS10	Pier Road;
LGS11	Berwick Urban Park;
LGS12	Trinity Church
LGS13	Lowrie's Shelter;

LGS14	Riverside, Tweedmouth;
LGS15	Goody Patch, Dock Road;
LGS16	Promenade, Spittal.
Protected Open Space Sites	
POS01	Old North Road
POS02	Countess of Buchanan Way
POS03	Tappee Loch
POS04	Highcliffe Green
POS05	Cemetery Lane, Prior Park
POS06	The Oval, Prior Park
POS07	Dean Drive, Prior Entrance

### Assessment of the current version of the BNP (Option 1)

The Plan approach (Option 1) is predicted to score positively for all SEA topics. Moderate positive effects predicted with respect to biodiversity, the historic environment and landscape. Minor positive effects are predicted for the climate change (adaptation) and the population and housing SEA topics.

Moderately positive effects are anticipated with respect to landscape through Plan provisions seeking to protect, and enhance access to the landscape and historic townscape of the NP area.

Moderate positive effects are predicted for biodiversity as the Plan seeks to protect and enhance biodiversity through protection and designation of green space/ green infrastructure and open space. Additional benefits are generated by requiring new developments to contribute to the NCMS.

Minor positive effects are predicted for the population and housing theme due to Plan policies promoting well designed housing and public realm and facilitating affordable housing provision in the countryside.

Table 0-2 Summary of overall effects for each SEA topic.

<i>SEA Topic:</i>	<i>Biodiversity</i>	<i>Climate change (adaptation)</i>	<i>Historic Environment</i>	<i>Landscape</i>	<i>Population &amp; Housing</i>
<i>Overall effects Option-1</i>	Moderate +ve	Minor +ve	Moderate +ve	Moderate +ve	Minor +ve
<i>Option-2</i>	Minor +ve	Neutral	Minor +ve	Minor +ve	Neutral

(Key: +ve=Positive, -ve=Negative)



## Assessment of the Option 2

Option-2 performs similarly to Option-1 but slightly less positively; with minor positive effects predicted for biodiversity, the historic environment and landscape and neutral effects for climate change and population and housing. The difference scores reflect the additional benefits of protecting sites as LGS and OPS through BNP policies BNDP6 and BNDP7.

## Mitigation

Through the SEA process, a number of recommendations are often revealed to enhance the positive effects of the plan and mitigate potential negatives. In this instance the following recommendation is likely to improve the performance of the plan:

BNDP5; Could include reference to the importance of agricultural land, adding the proviso that development must not lead to loss of such land particularly within flood plains.

## Monitoring

There is a requirement to present measures that could be used to monitor the likely significant effects of the Plan as identified through the SEA. No significant effects have been identified through the SEA.

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# 1. Introduction

## 1.1 Background

- 1.1.1 AECOM has been commissioned to undertake an independent Strategic Environmental Assessment (SEA) in support of the emerging Berwick-upon-Tweed Neighbourhood Plan (BNP).
- 1.1.2 The BNP is currently being prepared as a Neighbourhood Development Plan under the Localism Act 2012. The Neighbourhood Plan area, which comprises the administrative area of the civil parish of Berwick-upon-Tweed, is being prepared in the context of the saved policies of the Berwick-upon-Tweed Local Plan (1999) and also having regard to the emerging Northumberland Local Plan 2016 to 2036; currently in examination stage.
- 1.1.3 A Regulation 14 Consultation on the draft Plan is expected to take place in 2022. Northumberland County Council's (NCC) Habitats Regulations Assessment Report of the pre-submission draft BNP1 concluded that a Habitats Regulations Assessment would be required citing that some of the policies in the draft plan are likely to give rise to significant effects on European sites (Northumbria Coast SPA, North Northumberland Dunes SAC). The requirement for a HRA under the Habitat Regulations automatically triggers the requirement for SEA. The findings of the SEA process are set out in this Environmental report. Key information relating to the BNP is presented in Table 1.1.

**Table 1.1: Key facts relating to the Berwick-upon-Tweed Neighbourhood Plan**

Name of Qualifying Body	Berwick-upon-Tweed Town Council
Title of Plan	Berwick-upon-Tweed Neighbourhood Plan (BNP)
Subject	Neighbourhood planning
Purpose	Berwick-upon-Tweed Neighbourhood Plan is being prepared as a Neighbourhood Development Plan under the Neighbourhood Planning (General) Regulations 2012.  The BNP will be in conformity with the saved policies of the Berwick-upon-Tweed Local Plan (1999). The BNP has also been informed by the emerging Northumberland Local Plan. The examination hearing sessions for the Northumberland Local Plan are

<sup>1</sup> Northumberland County Council Report (Oct. 2019); Habitats regulations assessment report of Berwick-upon-Tweed neighbourhood plan pre-submission draft June 2019.

	complete and the county council has published proposed main modifications to the plan.
Timescale	2022 – 2036
Area covered by the plan	The BNP will be used to guide and shape development within the area covered by the administrative area of the civil parish of Berwick-upon-Tweed.
Summary of content	The BNP will set out a vision, strategy and range of policies for the Neighbourhood Plan area.
Plan contact point	Gareth Davies, Town Clerk, Berwick-upon-Tweed Town Council <a href="mailto:town.clerk@berwick-tc.gov.uk">town.clerk@berwick-tc.gov.uk</a>

## 1.2 SEA explained

- 1.2.1 SEA is a mechanism for considering and communicating the likely significant effects of an emerging plan, and reasonable alternatives in terms of key environmental issues. The aim of SEA is to inform and influence the plan-making process with a view to avoiding or mitigating negative environmental effects and maximising positive effects. Through this approach, the SEA for the BNP seeks to maximise the emerging Neighbourhood Plan's contribution to sustainable development.
- 1.2.2 The SEA has been prepared in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) which transposed into national law the EU Strategic Environmental Assessment (SEA) Directive<sup>2</sup>.
- 1.2.3 The SEA Regulations require that a report is published for consultation alongside the draft plan that 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'. The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 1.2.4 In line with the SEA Regulations this Environmental Report must essentially answer four questions:
- What is the scope of the SEA?
  - What has plan-making/SEA involved up to this point?
    - 'Reasonable alternatives' must have been appraised for the plan.
  - What are the appraisal findings at this stage?

<sup>2</sup> Directive 2001/42/EC

- i.e. in relation to the draft plan.
- What happens next?

1.2.5 These questions are derived from Schedule 2 of the SEA Regulations, which present 'the information to be provided within the report'. Table 1.2 presents the linkages between the regulatory requirements and the four SEA questions.

## 1.3 Structure of this Environmental Report

1.3.1 This document is the Environmental Report for the BNP and hence needs to answer all four of the questions listed above with a view to providing the information required by the SEA Regulations.

1.3.2 Each of the four questions is answered in turn within this report, as follows:

**Table 1.2: Questions that must be answered by the Environmental Report in order to meet regulatory<sup>3</sup> requirements**

Environmental Report question	In line with the SEA Regulations, the report must include... <sup>4</sup>
What is the plan seeking to achieve?	<ul style="list-style-type: none"> <li>An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes</li> </ul>
What is the sustainability 'context'?	<ul style="list-style-type: none"> <li>The relevant environmental protection <b>objectives</b>, established at international or national level</li> <li>Any existing environmental <b>problems</b> which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
<b>What's the scope of the SEA?</b>	<ul style="list-style-type: none"> <li>The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan</li> </ul>
What is the environmental 'baseline'?	<ul style="list-style-type: none"> <li>The environmental characteristics of areas likely to be significantly affected</li> <li>Any existing environmental <b>problems</b> which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
What are the key issues & objectives?	<ul style="list-style-type: none"> <li>Key <b>problems/issues</b> and <b>objectives</b> that should be a focus of (i.e. provide a 'framework' for) assessment</li> </ul>

<sup>3</sup> Environmental Assessment of Plans and Programmes Regulations 2004

<sup>4</sup> NB this column does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation.

Environmental Report question	In line with the SEA Regulations, the report must include... <sup>4</sup>
<p>What has plan-making/SEA involved up to this point?</p>	<ul style="list-style-type: none"> <li>• Outline reasons for selecting the <b>alternatives</b> dealt with (and thus an explanation of the 'reasonableness' of the approach)</li> <li>• The likely significant effects associated with <b>alternatives</b></li> <li>• Outline reasons for selecting the preferred approach in-light of <b>alternatives</b> appraisal/a description of how environmental objectives and considerations are reflected in the draft plan.</li> </ul>
<p>What are the assessment findings at this stage?</p>	<ul style="list-style-type: none"> <li>• The likely significant effects associated with <b>the draft plan</b></li> <li>• The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing <b>the draft plan</b></li> </ul>
<p>What happens next?</p>	<ul style="list-style-type: none"> <li>• The next steps for plan making/SEA process.</li> </ul>

## 2. Local Plan context and vision for the BNP

### 2.1 Local Plan context for the BNP

- 2.1.1 Berwick-upon-Tweed Town Council (BTC) took the decision to prepare a Neighbourhood Plan to enable the local community to influence the shape of development in the Parish.
- 2.1.2 The Council felt that if development was occurring in Berwick-upon-Tweed, then its residents deserved the opportunity to say what this development should look like and to be involved in shaping the future of the Parish in which they live.
- 2.1.3 The Civil Parish of Berwick-upon-Tweed was designated as a neighbourhood area in 2015, for the purposes of neighbourhood planning. The process of preparing the plan began formally in February 2016 with a series of five drop-in sessions which took place across the plan area. The town council established a steering group to lead the plan preparation process and the steering group held their first meeting in October 2015. The steering group and seven topic based working groups were established to reflect the issues raised during the drop-in sessions: built environment; natural environment; housing; employment and skills; transport; tourism and youth. Subsequently, the town council revised the management arrangements for the preparation of the plan and created a neighbourhood plan sub-committee, the first meeting took place in October 2018.
- 2.1.4 The neighbourhood plan sub-committee comprises equal members of the town council and representatives for the neighbourhood plan working groups. The working groups are made up of representatives from the town council, local volunteers and the local county councillors. They have worked on behalf of Berwick-upon-Tweed Town Council to develop the draft plan.
- 2.1.5 Two rounds of early engagement with the local community and stakeholders in early and late 2016; helped inform the issues, policy options and vision for the plan. A very positive 'side effect' of the plan has been the relationships created, developed and strengthened both in the community and with many other organisations. The Town Council has been able to incorporate into the Neighbourhood Plan the views, opinions and aspirations of residents and businesses in Berwick-upon-Tweed. Most importantly the Neighbourhood Plan shows the residents' vision for their Town and for their future.



- 2.1.6 Berwick-upon-Tweed Town Council is within Northumberland County Council (NCC). Currently the local plan for Northumberland consists of the saved policies of the former Local Planning Authorities that made up Northumberland before local government reorganisation in 2009. For the Berwick-upon-Tweed Neighbourhood Plan Area, these are the saved policies of the Berwick-upon-Tweed Local Plan (1999). The new Northumberland Local Plan (NLP) is currently in examination and once adopted, will replace the saved planning policies.
- 2.1.7 In the emerging NLP policy STP1, Berwick is placed at the top of the settlement hierarchy as a 'Main Town' (along with Alnwick) within the North Northumberland Delivery area. Main Towns are designated as the focus for employment, housing, retail and services. Policy TCS1 which establishes the role of Northumberland's town centres, places Berwick at the top of the hierarchy as a 'Main town-larger centre'. These are considered to have good levels of retail provision, community facilities, public transport hubs and off-street parking. They are also the focus for community activities, jobs and services for these highly populated areas and their hinterlands.

## 2.2 Vision for the Berwick-upon-Tweed Neighbourhood Plan

- 2.2.1 The BNP developed a multifaceted spatial vision, which was developed during earlier stages of plan making. The below are excerpts from the vision statement, highlighting its main themes.

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“ A border town bridging England and Scotland benefiting from a plethora of historic attractions, river/waterfront activities and the surrounding natural environment which provide a playground for outdoor adventure, history buffs, walkers, cyclists and naturalists.

A wonderful and unique place; a historic walled town, riverside and coastal neighbourhood all in one...Historic medieval streets are conserved and complemented elsewhere with sympathetic high-quality new developments and enhanced well used public spaces.

The High Street has an array of cafés, small specialist shops and high-quality restaurants. The town centre is pedestrian friendly, a thriving quayside.

Well-planned growth...[to] sustain new services for families...[and] a thriving college campus...offering excellent education facilities both academic and vocational. Our young people no longer have to leave to find a worthwhile opportunity.

...[A] balanced mix of local businesses with a host of smaller companies covering a wide range of sectors and activities providing permanent year-round employment. Retail parks and business centres locate[d] on well-connected sites on the outskirts.

Housing provision will be of a variety of size, tenure and price, suitable to meet the needs and aspirations of all families and households.

Vibrant Town Centres: the town and community centres of Berwick, Spittal and Tweedmouth will offer a mix of commercial, cultural, leisure and recreational facilities, accessible to residents and visitors.

Our Heritage: heritage assets will be recognised, conserved and enhanced, throughout the whole of the plan area, for the benefit of residents and visitors. Berwick, Spittal and Tweedmouth will be the foremost tourist destination in northern England, of regional and international significance.

Our Future: our communities will be a place for life-long learning, where high quality vocational skills and training are valued and available. Infrastructure will provide Further Education opportunities to learn skills and gain qualifications locally, to enable our young people to stay, develop and thrive in the area beyond their secondary education.

We will provide suitable housing, physical and mental health services, and other public services to support the skill, optimism and enthusiasm of young people. The plan will support delivery of a range of recreational and leisure facilities for young people and promote further investment of the existing indoor facilities and community organisations that are 'youth facing'. ”

2.2.2 To support the Neighbourhood Plan's vision statement, the BNP sets out a number of Neighbourhood Plan policies. The latest iteration of these policies have been appraised in Chapter 5 of this Environmental Report.

### 3. The Scope of the SEA

#### 3.1 SEA Scoping Report

3.1.1 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 Natural England, the Environment Agency and Historic England.<sup>5</sup> These authorities were consulted on the scope of the BNP SEA for a 5 week period from 10<sup>th</sup> November 2020 to 15<sup>th</sup> December 2020.

The purpose of scoping was to outline the 'scope' of the SEA through setting out:

- A context review of the key environmental and sustainability objectives of national, regional and local plans and strategies relevant to the Neighbourhood Plan;
- Baseline data against which the Neighbourhood Plan can be assessed;
- The key sustainability / environmental issues for the Neighbourhood Plan; and
- An 'SEA Framework' of objectives against which the Neighbourhood Plan can be assessed.

3.1.2 All statutory consultees provided a formal response to the Scoping Report. The comments made and how they have been considered and addressed, are presented in **Table 3.1** below.

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<sup>5</sup> In-line with Article 6(3) of the SEA Directive, these consultation bodies were selected because *'by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programme'*.

**Table 3.1 Consultation responses received on the SEA Scoping Report**

Consultation response	How the response was considered and addressed
<b>Environmental Agency</b>	The response did not point to specific issues in the BNP SEA scoping report but included generic advice / guidance. This has been taken into consideration in the preparation of the SEA.
<b>Natural England</b>	The response did not include specific reference to the BNP SEA scoping report but included generic advice / guidance. This has been taken into consideration in the preparation of the SEA.
<b>Historic England</b>	The response made several specific points pertaining to the BNP SEA scoping report. It also made reference to Historic England guidance; Neighbourhood Planning & the Historic Environment (Historic England Advise Note 11) and Sustainability Appraisal & Strategic Environmental Assessment (advise note 8). The guidance notes and the specific points raised, have informed the SEA process and the scoping report has been updated accordingly.

## 3.2 Key sustainability / environmental issues

3.2.1 The full updated Scoping Report (revision 1) is attached as **Appendix A** to this report. This section sets out a summary of the key issues that were identified through scoping.

3.2.2 Drawing on the review of the policy context and baseline information, the SEA Scoping Report was able to identify a range of sustainability / environmental issues that should be a particular focus of SEA. These issues are discussed below, presented by eight environmental themes:

3.2.3 The selected environmental themes incorporate the 'SEA topics' suggested by Annex I(f) of the SEA Directive<sup>6</sup>. These were refined to reflect a broad understanding of the anticipated scope of plan effects (drawing from the screening opinion and local knowledge).

3.2.4 The scoping process allowed for some sustainability topics to be 'scoped out'; as it was considered the Plan is unlikely to have significant effects on certain factors.

### 3.2.5 Air quality

There are no Air Quality Management Areas within the Neighbourhood Plan area. Furthermore, the plan does not allocate sites for housing development. Consequently, the NP should not engender a significant increase in emissions.

### Scoped out

### 3.2.6 Biodiversity

There are numerous designated biodiversity sites in and around the NP area, such as;

- The Northumberland Shore, Lindisfarne and the Lower Tweed and Whiteadder SSSIs.
- The NP area includes the Northumberland Dunes, Berwickshire and North Northumberland Coast and SACs.
- The Northumbria Coast SPA is within the NP area
- The NP includes the internationally designated Northumbria Coast and Lindisfarne Ramsar sites
- The Lindisfarne National Nature Reserve (NNR) is around 2.6 miles south of the NP area.

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<sup>6</sup> The SEA Directive is 'of a procedural nature' (para 9 of the Directive preamble) and does not set out to prescribe particular issues that should and should not be a focus, beyond requiring a focus 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*' [our emphasis]

- The Northumberland Coast AONB lies just outside the southern boundary of the NP area.
- The Neighbourhood Plan area contains several Priority Habitats including; Coastal Salt Marsh and Mudflats along parts of River Tweed, Maritime cliffs and slopes along the coast, south of the NP area. There are areas of Coastal and Floodplain grazing Marsh along the Tweed north of Riverdene. There is an area of Lowland Fens habitat between Warkworth Terrace and North Rd.
- There are pockets of Deciduous Woodland priority habitat scattered throughout the NP area with around 8.5 ha. of Ancient Woodland between Common Burn and the A1.

In view of the numerous biodiversity sites it is imperative to ensure that there are no significant adverse effects upon the designated sites in the BNP area.

### Scoped in

#### 3.2.7 Climatic factors

- Mitigation of and adaptation to climate change are national and local priorities that the Plan should seek to contribute towards. However, the BNP has limited scope to address Climate Change Mitigation.

Climate Change mitigation **Scoped out**

- There are areas within Flood Risk Zone 3 in the Plan area due to risk of fluvial and surface water flooding along the River Tweed corridor and coastal areas. The remaining areas are predominantly in Flood Zone 1. There is the potential to explore how resilience to climate change can be enhanced as well as contributing towards flood risk mitigation.

Climate Change adaptation **Scoped in**

#### 3.2.8 Historic environment

The Neighbourhood Plan area contains a considerable number of heritage assets including;

- The three conservation areas of Berwick-upon-Tweed, Tweedmouth and Spittal.
- There are numerous Listed Buildings and Structures and nine Scheduled Monuments
- There is a Historic Battlefield site; the site of the Battle of Halidon Hill of 1333.
- The NP area includes four sites on the Heritage at Risk Register.

There are multiple heritage assets in the NP area which could be affected by policies and proposals within the plan (either positively or negatively). An inappropriate approach that does not seek to conserve and enhance heritage

assets could result in the erosion of the townscape quality. Therefore, there is potential for significant effects upon the setting of heritage assets and the character of the built and natural environment.

### Scoped in

#### 3.2.9 Landscape

A number of statutory and non-statutory landscape designations cover parts of the NP Area.

- The coastline is defined as a Heritage Coast reflecting its natural beauty, terrestrial, coastal and marine flora and fauna and heritage features.
- The Tweed Area of High Landscape Value is designated by Northumberland County Council and covers the majority of the rural land in and around the NP area, to the west of Berwick-upon-Tweed

The BNP does not propose to allocate sites for housing or employment. However, there are potential positive effects on landscape character as policies in the BNP may influence site allocations in the Local Plan or any other development that falls outside the built area with potential to have adverse effects on landscape character.

### Scoped in

#### 3.2.10 Land, soil and water resources

- There are important soil resources in the NP area that ought to be protected. However, the BNP does not intend to allocate sites for development. Therefore, a significant effect upon soil resources is considered unlikely.
- Whilst the BNP area overlaps Ground Water Protection Zones (SPZ) and a Nitrate Vulnerable Zone (NVZ), it is considered unlikely that significant effects upon water quality would occur as a result of the BNP. The plan does not allocate sites for housing or employment and any changes to land use would not be anticipated to increase nitrate or other pollution.
- With regards to waste water treatment and drainage, the BNP is not expected to cause issues to existing and planned infrastructure, and so significant effects in this respect are also unlikely

**Soil – Scoped out**

**Water resources– Scoped out**

**Water quality – Scoped out**

### 3.2.11 Population and community

- The population of Berwick-upon-Tweed has increased by a modest 0.7% between 2011 and 2018. Although the growth proposed at a strategic level will produce some increase in population, this is unlikely to be significant.
- Population trends in the Neighbourhood Plan area show an increasingly aging population. This is demonstrated by the higher than average 65+ age group and lower than average 25-44 age group. The implications of this will need to be carefully considered and planned for.

#### Scoped in

### 3.2.12 Health and Wellbeing

- The Plan area has broadly healthy population with higher than average life expectancy. There are several health care facilities in the area.
- The NP area has substantial green space and open space.
- There are no areas within the 10-20% most deprived (nationally) category in the NP area.
- The Plan is unlikely to have significant effects on the above issues and there are no particular groups that would likely experience effects disproportionately.

#### Scoped out

### 3.2.13 Transportation

- The Neighbourhood Plan area is well served by the highway network and benefits from good railway and bus connectivity.
- Compared to the national average, a significantly greater percentage of local residents are likely to travel to work on foot and less likely to travel by car.
- New development is likely to increase traffic and improve the viability of public transport, but this is unlikely to be significant, and not attributable to the NDP.
- The NDP does not allocate sites for housing or employment and proposals in the Plan are not likely to generate additional traffic and movement in the NDP area to an extent that would produce significant effects.

#### Scoped out



### 3.3 SEA Framework

- 3.3.1 The SEA framework has been established through the identification of key issues and environmental objectives as part of the scoping exercise. This draws upon the baseline position and policy context that has been prepared for a range of SEA topics.
- 3.3.2 The framework consists of a set of headline objectives and ancillary questions, which has been used to appraise the environmental effects of the draft Plan (and any reasonable alternatives).
- 3.3.3 Table 3.2 below outlines the full SEA Framework, which focuses on those issues that have been identified as the most important to consider in the preparation of the Plan; but acknowledging the limited influence that the Plan can/will have in some areas.
- 3.3.4 These issues were then translated into an ‘SEA Framework’. This SEA Framework provides a methodological framework for the appraisal of likely significant effects on the baseline.

Table 3-1.2: SEA Framework for the Berwick-upon-Tweed Neighbourhood Plan

SEA Objective	Supporting questions (Will the option/proposal help to...)
<p><b>1. Biodiversity:</b> Protect, maintain and enhance biodiversity habitats and species; achieving a net environmental gain and stronger ecological networks.</p>	<ul style="list-style-type: none"> <li>• Support connections between habitats in the Plan area?</li> <li>• Avoid significant impacts on designated sites within and in the vicinity of the NP area including; the Northumberland Shore, Lower Tweed and Whiteadder and Lindisfarne, SSSIs and Northumberland Coast AONB?</li> <li>• Support continued improvements to the designated sites in the Neighbourhood Plan area?</li> <li>• Achieve a net gain in biodiversity?</li> <li>• Support access to, interpretation and understanding of biodiversity?</li> <li>• Increase the resilience of biodiversity in the Neighbourhood Plan area to the effects of climate change?</li> </ul>

SEA Objective	Supporting questions (Will the option/proposal help to...)
<p><b>2. Climate Change Adaptation:</b></p> <p>Avoid and manage flood risk and support the resilience of the Berwick-upon-Tweed Neighbourhood Plan area to the potential effects of climate change.</p>	<ul style="list-style-type: none"> <li>• Improve green infrastructure networks in the plan area to support adaptation to the potential effects of climate change?</li> <li>• Sustainably manage surface water run-off, ensuring that the risk of flooding is not increased (either within the plan area or downstream) and where possible reduce flood risk?</li> <li>• Ensure the potential risks associated with climate change are considered through new development in the plan area?</li> <li>• Avoid placing development in areas that are at the greatest risk of flooding?</li> </ul>
<p><b>3. Historic Environment:</b></p> <p>Protect, enhance and manage the distinctive character and setting of heritage assets and the built environment and;</p> <p>Achieve high quality sustainable design for buildings, spaces and the public realm and;</p> <p>Foster heritage-led regeneration and address heritage at risk and;</p> <p>Promote heritage-led sustainable tourism</p>	<ul style="list-style-type: none"> <li>• Conserve, better reveal the significance and enhance heritage assets, their setting and the wider historic environment?</li> <li>• Contribute to better management of heritage assets?</li> <li>• Identify and protect / enhance features of local importance?</li> <li>• Support access to, interpretation and understanding of the historic environment?</li> <li>• Consider the impact on setting in a manner proportionate to the significance of the heritage asset affected.</li> <li>• Promote heritage-led regeneration?'</li> <li>• Lead to the repair and adaptive re-use of a heritage asset and encourage high quality design?</li> </ul>
<p><b>4. Landscape:</b></p> <p>Protect, enhance and manage the distinctive character and appearance of landscapes.</p>	<ul style="list-style-type: none"> <li>• Conserve, better reveal the significance of and enhance landscape assets?</li> <li>• Contribute to better management of landscape assets?</li> <li>• Identify and protect/ enhance features of local importance?</li> <li>• Support access to, interpretation and understanding of the surrounding landscape?</li> <li>• Improve linkages to open space and the countryside?</li> </ul>

SEA Objective	Supporting questions (Will the option/proposal help to...)
<p><b>5. Population and Housing:</b></p> <p>Provide everyone with the opportunity to live in good quality, affordable housing which meets the needs of occupiers throughout their lives.</p>	<ul style="list-style-type: none"> <li>• Support the provision of a responsive range of house types and sizes to meet identified needs of different community groups?</li> <li>• Support the provision of affordable housing in the NP area.</li> <li>• Create sustainable new communities with good access to a range of local services and facilities?</li> </ul>

## 4. What has plan making / SEA involved to this point?

### 4.1 Introduction

4.1.1 In accordance with the SEA Regulations the Environmental Report must include:

- An outline of the reasons for selecting the alternatives dealt with; and
- The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in light of alternatives appraised.

The 'narrative' of plan-making / SEA up to this point is told within this part of the Environmental Report.

### 4.2 Overview of plan making / SEA work undertaken

4.2.1 The Town Council have gathered a range of evidence, and undertaken consultation with communities and other key stakeholders to identify the issues and opportunities that need to be addressed in the Neighbourhood Plan.

4.2.2 The SEA process is being delivered by AECOM as part of the Locality Technical Support Programme.

4.2.3 The first step in the SEA Process was the development of a Scoping Report, which was published for Consultation in November 2020.

4.2.4 A draft Plan has been shared with AECOM, who have undertaken an appraisal of the Plan 'as a whole', taking into account each of the individual policies in combination. As part of this process, it is important to consider 'reasonable alternatives'.

### 4.3 Assessment of reasonable alternatives for the Neighbourhood Plan

4.3.1 A key element of the SEA process is the appraisal of 'reasonable alternatives' for the BNP. The SEA Regulations<sup>7</sup> are not prescriptive as to what constitutes a reasonable alternative, stating only that the Environmental Report should present an appraisal of the '*plan and reasonable alternatives taking into account the objectives and geographical scope of the plan*'.

4.3.2 The following sections therefore describe how the SEA process to date has informed the development strategy for the Neighbourhood Plan area.

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<sup>7</sup> Environmental Assessment of Plans and Programmes Regulations 2004

## 4.4 Housing Strategy

- 4.4.1 Overall County level housing numbers (targets) are primarily the responsibility of the Local Planning Authority; Northumberland County Council (NCC).
- 4.4.2 The Neighbourhood Plan policies must be in conformity with the saved policies of the Berwick-upon-Tweed Local Plan (1999) and have regard for policies of the emerging Northumberland Local Plan. The saved policies of the Berwick-upon-Tweed Local Plan (1999) will eventually be replaced by the emerging Northumberland Local Plan (NLP). Following examination hearings in 2019/2020, the Inspector wrote to the Council to confirm that whilst she considers the submitted Local Plan not to be sound, it is likely that it can be made sound by modifications. Public consultations on the proposed main modifications to the Local Plan took place between June-August 2021 and the Inspectors are now finalising the report into the soundness of the Plan<sup>8</sup>.

## 4.5 Key information

- 4.5.1 The spatial strategy of the emerging Northumberland Local Plan is to focus the majority of new development within main towns and service centres. Berwick-upon-Tweed is classified as a main town, part of the North Delivery Area. Representing approximately 17% of the county's population, the area is described as largely rural interspersed with market towns along the A1 corridor and bordering the Northumberland National Park. The emerging NLP (para. 4.32) directs 19% of the NLP's housing targets to this area with half going to Alnwick and Berwick-upon-Tweed. The emerging NLP allocates housing land in Berwick-upon-Tweed with the objective of boosting housing delivery there.
- 4.5.2 The following is a brief review of housing policies within the emerging NLP that are relevant to the BNP.
- Main Towns, such as Berwick-upon-Tweed are placed at the top of the settlement hierarchy as they offer the greatest range of employment opportunities and services such as schools, health, leisure and retail facilities (Policy STP1).
  - Policy HOU2 gives a housing requirement of 17,700 new dwellings (885 dpa) for the county as a whole over the plan period (2016-2036). This figure is substantially over the 14,340 figure produced by the Standard Methodology for calculating local housing need. The higher growth proposed was influenced by the Council's Housing Economic Growth Options report<sup>9</sup> which predicts an ambitious growth scenario for the county.

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<sup>8</sup> Situation as of February 2022, source: [www.northumberland.com](http://www.northumberland.com)

<sup>9</sup> NCC report 2018; 'Housing-Economic Growth Options'

<https://www.northumberland.gov.uk/NorthumberlandCountyCouncil/media/Planning-and-Building/planning%20policy/Studies%20and%20Evidence%20Reports/Demographic%20Studies/NCC-Housing-Economic-Growth-Options-Report-June-2018.pdf>

- Policy HOU3 (housing requirements for neighbourhood plan areas) identifies a requirement of 680 new dwellings within for the BNP area over the period of the local plan (2016-2036). The NLP (table 7.2 distribution of housing requirements and commitments in Northumberland) gives the total housing requirement for the North delivery area as 3,390 over plan period. Completions and commitments (including minded-to-approve applications) total 3,654 dwellings. This gives a residual (total housing required over plan period minus total completions and commitments and minded to approve over same period) of -264 homes i.e. the North Delivery area has 'over-delivered' by 264 dwellings for the plan period. Whilst the overall number of completions and commitments exceeds the minimum housing requirement over the plan period, the NLP allocates net additional dwellings to meet future needs and to help balance the County's housing market (emerging NLP para 7.21).
- Policy HOU 4 allocates sites for housing development (five or more dwellings indicative capacity) to deliver the strategic housing priorities and residual needs of the County (additional to currently permitted and minded to approve sites). The strategic development sites for the NP area are reproduced in Table 4.1 below.

Table 4-1.1 Housing development site allocations (NLP HOU 4 Strategic Policy)<sup>10</sup>

Site name	Site Area (ha)	Indicative dwelling number
Land at Robert's Lodge, east of Etal Road, Eildon View and south of Cemetery Lane, Tweedmouth	6.89	100-150
Former JT Dove and Coal Yard east of Northumberland Road and west of Billendean Road, Tweedmouth	3.00	60 - 80
Berwick Seaview Caravan and Motorhome Site, Billendean Road, Tweedmouth	2.65	30 - 40
Land adjacent to former Kwik Save, Walkergate, 0.11 10 Berwick-upon-Tweed	0.11	10

<sup>10</sup> Source: Northumberland Local Plan Publication Draft Plan (Reg. 19)

## 4.6 Are there any reasonable alternatives?

- 4.6.1 The emerging NLP's policy HOU 4 allocates a total of four sites within the NP area for 200 to 280 dwellings (Table 4.1). Berwick-upon-Tweed town council supports the level of housing development and the proposed allocations. The BNP does not allocate further growth to what has already been set at strategic level. As the draft BNP does not allocate sites for employment or residential development there are no reasonable alternatives to consider in terms of housing growth or development sites.
- 4.6.2 One reasonable alternative considered in the SEA process pertains to BNP policies BNDP6 (Local Green Space) (LGS) and BNDP7 (Protected Open Space). BNDP6 designates 16 sites in the NP area as LGS and BNDP6 allocates a further 7 sites as Protected Open Space. The emerging NLP's policy INF5 (Open space and facilities for sport and recreation) creates a specific designation of Protected Open Space which seeks to retain existing areas of open space within Northumberland. The supporting text to policy states that *'whilst the opportunity to create Local Green Space through the Local Plan exists, the County Council considers that, given the need to show that any such designation is demonstrably special to a local community, the most appropriate mechanism for designating Local Green Space is through a neighbourhood plan.'* Under the policy development likely to result in loss of protected open space will not be supported unless it meets a set of criteria. These include, inter alia, the provision of a replacement area of space of equivalent or better quality, in a suitable location, or where the development proposed is for alternative sports and recreation, the needs for which, outweigh the loss. Engagement on the emerging NP has identified that the distinctiveness of the plan area is hugely valued by the local community. Therefore, the BNP designates areas of Local Green Space seeking to protect these areas which contribute to the character and the landscape in Berwick-upon-Tweed and are valued by the community. A further 7 sites (not included in the NLP's POS list) were also identified as valued open spaces by the community but do not meet the requirements for the LGS designation. These are designated as POS instead in Policy BNDP7. The 16 LGS sites in BNDP6 are designated in the emerging NLP as POS. The 7 POS sites in BNDP7 are not designated as POS in the NLP. The LGS and POS sites are listed in Table 0-1.
- 4.6.3 The SEA considered the reasonable alternative of not designating the 16 LGS and 7 POS sites in the BNP, as the LGS sites would be offered a degree of protection, at strategic level, through the emerging NLP as POS.
- 4.6.4 In conclusion there are two reasonable alternatives pertaining to open space designation.
- **Option 1:** Given the importance of the identified sites in Table 0-1, to the community, they should be designated as LGS as they meet the requirements for LGS designation (as assessed by the BNP). The remaining

sites, also identified as important to the community, but which do not meet the LGS designation requirements, are designated as POS to safeguard them from future development.

- **Option 2:** Retain the emerging Local Plan's protection of the sites as POS as this offers a degree of protection to the sites and do not designated further POS sites.

## 5. What are the appraisal findings at this current stage?

### 5.1 Introduction

5.1.1 The aim of this chapter is to present appraisal findings and recommendations in relation to the Regulation 14 version of the BNP.

### 5.2 Current approach in the Neighbourhood Plan and the development of Neighbourhood Plan policies

5.2.1 Table 5.1 below, groups the draft BNP policies under 5 broad categories

Table 5-1 Berwick-upon-Tweed NP Policies

#### Housing and the built environment

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BNDP2	Design principles
BNDP3	Tools to facilitate good design
BNDP4	Public realm
BNDP5	Location of new development

#### Natural and historic environment

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BNDP1	Heritage assets
BNDP6	Local green space
BNDP7	Protected open space
BNDP8	Key views of the River Tweed and the coastline
BNDP9	Access to the River Tweed and the coastline
BNDP10	Biodiversity
BNDP11	Northumberland Coastal Mitigation Service

#### Community facilities

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BNDP12	Allotments
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#### Transport

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BNDP15	Sustainable transport and new development
BNDP16	Walking and cycling
BNDP17	Car parking



## BNDP18 Public transport hub

### Employment and Economy

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## BNDP13 Tourism and leisure

## BNDP14 Tweedmouth, Spittal and Newfields

### 5.3 Approach to the appraisal

- 5.3.1 The appraisal is structured under each of the SEA Objectives that are set out in the SEA Framework.
- 5.3.2 For each Objective, 'significant effects' of the current version of the plan on the baseline are predicted and evaluated. Account is taken of the criteria presented within Schedule 2 of the Regulations.<sup>11</sup> So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. These effect 'characteristics' are described within the assessment as appropriate.
- 5.3.3 Every effort is made to identify / evaluate effects accurately; however, this is inherently challenging given the high level nature of the plan. The ability to predict effects accurately is also limited by understanding of the baseline and the nature of future planning applications. Because of the uncertainties involved, there is a need to exercise caution when identifying and evaluating significant effects and ensure all assumptions are explained. In many instances it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) in more general terms.

### 5.4 SEA Objective 1 Biodiversity

*Protect, maintain and enhance biodiversity habitats and species; achieving a net environmental gain and stronger ecological networks.*

#### Appraisal findings: Draft BNP Policies

#### 5.4.1 Housing and the built environment

Policies BNDP2 to BNDP5 are primarily concerned with the location and design of development and the public realm. Policy BNDP2 (Design principles) seeks to protect trees, requiring these to be retained where they form an important part of the amenity of the area, if retention is demonstrably not practical, new replacement is required in the vicinity, such that an overall net gain is achieved.

Overall, this set of policies is predicted to be beneficial, leading to **minor positive effects** on biodiversity as the policies seek to reserve existing trees

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<sup>11</sup> *Environmental Assessment of Plans and Programmes Regulations 2004*

and ensure net gain where their preservation is not practical. These are not significant effects in their own right though.

#### 5.4.2 Natural and historic environment policies

Policy BNDP10 is predicted to have positive effects as it requires development to preserve and enhance biodiversity by ensuring it does not lead to loss or significant harm to sites of biodiversity value and to protected priority species and associated habitat.

The policy requires that development proposals demonstrate how they would achieve measurable gains for biodiversity. Where development would result in loss or significant harm to biodiversity, applicants must demonstrate that the adverse impacts are adequately mitigated or offset (as a last resort). There are several designated sites of biodiversity importance within the NP area such as the Northumbria Coast Ramsar / SPA, the North Northumberland Dunes SAC and Northumberland Coast SSSI. These provide habitats for nationally (and internationally) important populations of migratory and wintering waders, wildfowl and breeding tern species. The sites are particularly vulnerable to disturbance from recreational activities. Policy BNDP11 seeks to offer a degree of protection to these habitats by requiring new development to contribute to the Northumberland Coastal Mitigation Service (NCMS). The NCMS employs coastal wardens who educate and advise recreational users (e.g. dog walkers, joggers, horse riders and sea anglers) as to how they can enjoy the coast without causing excessive disturbance to important bird populations.

Policy BNDP2 is primarily concerned with the historic environment but includes the requirement for new development not to remove trees which are part of the special character of the area. The policy extends protection to heritage assets including historic parks and gardens which provide habitats for biodiversity and can act as biodiversity stepping stones. Therefore, this policy is likely to have positive effects.

Policies BNDP6 and BNDP7 are likely to have favourable effects on biodiversity as they designate local green space (including parks, recreation grounds and promenades) and protected open space. Such areas provide habitats for flora and fauna and are likely to contribute to the connectivity and continuity of biodiversity networks thus helping reduce fragmentation.

The policies seek to preserve and enhance biodiversity, pursue BNG through new development and offer protection to designated biodiversity sites through the NCMS. A greater amount of open space is protected (compared to the emerging Local Plan), and this includes a range of sites identified for their green space value. Therefore, this set of policies is anticipated to have **moderately positive effects** on biodiversity.

### 5.4.3 Community facilities policies

BNDP12 seeks to protect allotments with any loss due to development only supported if alternative new allotment sites are provided to compensate for the loss.

Allotments can serve as biodiversity hotspots for native species within urban green infrastructure. Therefore, this policy is likely to have **minor positive effects** on biodiversity.

### 5.4.4 Transport policies

Policies BNDP15 to BNDP18 support development proposals that facilitate a shift towards more sustainable modes of transport. By promoting public transport (buses and trains and park and ride schemes) and active travel (walking and cycling) these policies are likely to reduce reliance on private vehicles thus reducing transport associated emissions and traffic collisions. Ecosystems are impacted by air pollution, such as sulphur and nitrous oxide emissions which affect their ability to function and grow. The emissions also impact the water quality, vegetation and soils, often increasing their acidity with adverse effects on flora and fauna. This ultimately affects the ability of ecosystems to provide "ecosystem services", such as nutrient cycling, carbon cycling and water provision. There are numerous nationally and internationally designated, biodiversity sites within and in the vicinity of, the NP area which are particularly sensitive to these effects. This group of policies is therefore predicted to have **minor positive effects** on biodiversity as it promotes more sustainable forms of transport thus helping reduce vehicular emissions.

### 5.4.5 Employment and Economy policies

Policies BNDP13 relates to tourism and the local economy. Whilst expansion of tourism can potentially create additional recreational pressures on sensitive biodiversity sites, the likely limited scale of such developments combined with the mitigation offered through the emerging NLP, the NCMS and other policies in the BNP, are predicted to counterbalance any potential effects. BNDP14 supports development within Tweedmouth, Spittal and Newfields. Development in these areas may potentially impact biodiversity in the Lower Tweed and Whiteadder SSSI and Northumberland Shore SSSI as these areas are within the impact risk zones (IRZ) of these important sites. Having said that the Plan does not allocate development sites and the emerging local plan offers a degree of protection to important biodiversity sites within the NP area leaving **neutral effects** overall.

### 5.4.6 Overall (cumulative) effects

Overall, the plan is predicted to have **moderately positive effects** on biodiversity as the Plan policies seek to protect and enhance biodiversity through protection and designation of green space/ green infrastructure and

open space. Additional benefits are generated by requiring new developments to contribute to the NCMS.

## 5.5 SEA Objective 2: Climate change

*Avoid and manage flood risk and support the resilience of the Berwick-upon-Tweed Neighbourhood Plan area to the potential effects of climate change.*

### 5.5.1 Housing and the built environment

Policies BNDP2 to BNDP5 are concerned with the location and design of development and the public realm. Policy BNDP2 (Design principles) requires development to embed links within development to the wider area and prevent loss of existing cycle and pedestrian routes. New development is to prioritise pedestrian and cycle movement and limit car parking spaces. Ramps are to be provided where appropriate to ensure the mobility of all users is catered for.

BNDP3 (Tool to facilitate good design) requires new development to follow the Berwick-upon-Tweed Design Code<sup>12</sup> which also incorporates good accessibility, pedestrian routes and street furniture such as Cycle Stands to encourage walking and cycling.

BNDP4 (Public realm) also promotes improved permeability and access to public transport, services and facilities and incorporates pedestrian and cycle-priority environments that are not dominated by vehicles. This group of policies is expected to encourage more sustainable forms of travel such walking and cycling and public transport and therefore helpful in reducing emissions associated with vehicular traffic.

Policy BNDP5 pertains to development in the country side; defined as any area outside settlement boundaries. The policy echoes policy HOU8 (Residential development in the open countryside) of the emerging NLP, supporting certain types of developments in the countryside such as affordable housing on rural exception sites, reuse of redundant buildings and the sustainable growth/expansion of businesses. The policy also supports housing for rural workers and those in charge of farm businesses. The latter is likely to reduce longer car journeys by allowing such workers to live near their places of work and therefore beneficial in terms of reducing emissions but effects are unlikely to be significant.

Policy BNDP14 supports development within Tweedmouth, Spittal and Newfields. Development in these areas is likely to be more sustainable; being in close proximity to local service centres thus potentially reducing car journeys and encouraging more sustainable forms of transport such as cycling, walking and public transport (these are also embedded in the design

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<sup>12</sup> [Berwick-upon-Tweed Design Code \(AECOM -2018\)](#)

Code). This should help reduce transport associated emissions. Therefore, favourable effects on climate change are likely.

Overall, this group of policies is predicted to have mixed effects on climate change adaptation ranging from uncertain **minor negative effects** associated with developments in the countryside which potentially impact agricultural land and flood resilience, to **minor positive effects** associated with development in sustainable locations which may help reduce the number of car journeys and encourage modal shift.

#### 5.5.2 Natural and historic environment policies

Policies BNDP6 and BNDP7 designate local green space (including parks, recreation grounds and promenades) and protected open space; thus offering these spaces a degree of protection from future development. Such spaces often serve to provide valuable flood resilience through improved permeability and flood attenuation / retention. Green infrastructure (GI) also provides valuable ecosystem services helping restore natural flood defences, providing CO2 storage and reducing urban heat island effects. Similarly enhancing biodiversity (BNDP10) protects and restores ecosystem services which in turn help mitigate climate change and cope with its impacts. This is realised through various mechanisms such as absorption of excess flood water, buffering against coastal erosion and extreme weather events. Many habitats are major stores of carbon, protecting them also helps limit atmospheric greenhouse gas (GHG) concentrations. Consequently, this set of policies is anticipated to have **minor positive effects** on climate change.

#### 5.5.3 Transport policies

Policy BNDP15 requires development proposals to demonstrate how they prioritise pedestrians, cyclists and public transport. Policy BNDP16 supports the extension / improvement of Berwick's walking and cycling networks particularly the improvement of connections between residential areas, commercial / Industrial, schools and the town centre. BNDP17 supports Park and Ride/Walk schemes and BNDP18 promotes the development of Berwick-upon-Tweed's train station as a transport hub that improves access to public transport. This set of policies is likely to reduce reliance on private vehicles by facilitating access to public transport and encouraging active travel (walking and cycling), thus reducing transport associated emissions. Therefore, the policies are predicted to have **minor positive effects** on climate change.

#### 5.5.4 Community facilities policies

BNDP12 seeks to protect allotments which can also serve to improve permeability (to surface water) within built up urban areas, act as carbon sinks and provide habitat for biodiversity. Therefore, **minor positive effects** are likely.

### 5.5.5 Employment and Economy policies

Policy BNDP13 pertains to Tourism and leisure development, including in the countryside. Policy BNDP 5 supports housing rural workers and those controlling farm businesses. The latter is likely to produce minor beneficial effects as it would help cut car journeys undertaken by such workers to reach their places of work in the countryside. The policies do not explicitly refer to issues such as flood risk and could potentially result in loss of agricultural land which may serve a flood plain function. Having said that, the policies echo policies ECN14 (Farm/ rural diversification) and HOU 8 (Residential development in the open countryside) in the emerging NLP and therefore no additional effects are anticipated as a result of these BNP policies. The issue of flood risk is also addressed in the emerging NLP. On balance, the policies are not expected to produce significant effects. Therefore, **neutral effects** are anticipated overall.

### 5.5.6 Overall (cumulative) effects

Several policies are positive with regards to climate change (in terms of protecting and enhancing green space and encouraging sustainable modes of transport) the contribution made is only minor when considering all the policies combined. Therefore, **minor positive effects** are predicted.

## 5.6 SEA Objective 3: Historic Environment

*Protect, enhance and manage the distinctive character and setting of heritage assets and the built environment and;*

*Achieve high quality sustainable design for buildings, spaces and the public realm and;*

*Foster heritage-led regeneration and address heritage at risk and;*

*Promote heritage-led sustainable tourism*

### 5.6.1 Housing and the built environment

Policies BNDP2-BNDP5 are generally positive with respect to the historic environment as they require new development to make a positive contribution to local character and distinctiveness. In conservation areas, developments must ensure sympathetic integration with existing townscape and landscape; using prevailing finishing materials. The scale (e.g. massing and height) should not disrupt the distinctiveness and rhythm within conservation areas, maintaining the historic street pattern and spaces. Similarly, BNDP5 (para. G) states that development must retain and enhance the heritage value of existing spaces and relationship to surrounding buildings.

Generally favourable effects are anticipated through this set of policies as they require development to fully assess impacts on heritage assets and their settings and to maintain the distinctiveness and character of the historic environment. Consequently, **minor positive effects** are anticipated.

### 5.6.2 Natural and historic environment policies

BNDP1 (Heritage assets) seeks to protect designated and non-designated heritage assets within the NP area. Where impacts are likely, applicants must provide information describing the significance of any heritage assets affected including the contribution made by their setting. Development affecting conservation areas or their settings will only be supported where it preserves or enhances the characteristics constituting their significance. An assessment of the impact must be prepared that considers the impacts of development.

This must take into account the historic layout of the conservation area, enhance / preserve its character and distinctiveness, reflect the quality of the townscape (design, materials detailing, boundary treatment and landscaping).

Where substantial harm or loss to designated heritage assets or their settings is likely, development will only be permitted in exceptional circumstances where substantial public benefits outweigh such harm/loss (e.g. development of international importance or where net additional long-term employment is being provided). The policy adds that in such circumstances planning obligations will be attached to minimise any harm or loss. Non-designated heritage assets are to be similarly protected in proportion to their significance. The policy also promotes development that is likely to secure the future of heritage assets that are at risk of decay or currently under used. The policy is expected to produce **minor positive effects** as it seeks to preserve the character of conservation areas and bring disused heritage assets in use.

Policies BNDP8 and BNDP9 designate local green space (including parks, recreation grounds and promenades) and protected open space thus offering these spaces a greater degree of protection from future development. The majority of these sites are of high heritage significance, forming part of the historic landscape and townscape character associated with the conservation areas. The policies are therefore predicted to have favourable effects (**moderately positive**) as they seek to protect to these important sites and their significant contribution to the historic environment.

BNDP10 is concerned with key views from and into the River Tweed corridor and the coastal strip. The River Tweed corridor is surrounded by the three conservation areas and therefore views into and out of the Tweed corridor are an integral part of the conservation areas forming part of the historic character and landscape of these areas. Similarly, key views into and out of the coastal strip form a significant part of the character and landscape of the conservation areas. The policy is predicted to have positive effects on the historic

environment as it seeks to maintain and enhance (if appropriate) this key aspect of the historic landscape of the NP area.

Overall, this set of policies is anticipated to have mixed effects; **moderate positive effects** are anticipated as the Plan offers locally specific guidance and protection to heritage assets in the NP area. Historic England guidance places emphasis on the importance of assessing, and taking account of, the significance of heritage assets and their settings and this policy should ensure that this is followed for development proposals in the NP area. Other positive aspects of the policy include the support for the bringing back into use of heritage assets in poor state of repair and/or in disuse.

### 5.6.3 Community facilities policies

BNDP12 (Allotments) is not expected to give rise to significant effects on the historic environment.

### 5.6.4 Transport policies

Policies BNDP15 to BNDP18 support development proposals that help achieve sustainable modes of transport and facilitate a modal shift towards more sustainable modes of transport. Air pollution is a key factor in the degradation of surfaces of historical buildings and monuments. The impact of pollutants emitted into the atmosphere on materials is substantial and often irreversible. However, there are no air quality management areas in Berwick and although the policies are helpful, they are unlikely to give rise to significant effects.

### 5.6.5 Employment and Economy policies

Policies BNDP13 and BNDP14 relate to tourism and leisure and development in town centres. Both policies are predicted to have favourable effects as they require development to take into account the siting, scale, materials, design and character of the surrounding area, including historic and natural assets.

### 5.6.6 Overall (cumulative) effects

Overall, **moderately positive effects** are anticipated through policy provisions seeking to protect key views relating to the River Tweed corridor and the coastal strip and policies seeking to protect and enhance heritage assets (and their settings) and bring back into use those that are in decay or disuse.

## 5.7 SEA Objective 4: Landscape

*Protect, enhance and manage the distinctive character and appearance of landscapes.*



### 5.7.1 Housing and the built environment

Policies BNDP2-BNDP5 address design of development and the public realm, requiring that new development should make a positive contribution to local character and distinctiveness. In conservation areas, development must ensure sympathetic integration with existing townscape and landscape; using prevailing finishing materials. The scale (e.g. massing and height) should not disrupt the distinctiveness and rhythm within conservation areas, maintaining the historic street pattern and spaces. BNDP4 (para. G) states that development must retain and enhance the heritage value of existing spaces and relationship to surrounding buildings. This set of policies is predicted to have **minor positive effects** on the landscape and townscape as it seeks to ensure new development maintains the distinctiveness and character of the landscape and townscape in the NP area.

### 5.7.2 Natural and historic environment policies

Policy BNDP1 is likely to have favourable effects as it includes the requirement that proposals reflect the quality of the historic townscape (through design, materials, boundary treatment, soft and hard landscaping) and also trees forming part of the special character of the area.

Policies BNDP6 and BNDP7 designate local green space (including parks, recreation grounds and promenades) and protected open space thus offering these spaces a degree of protection from future development. These sites represent a vital part of the landscape of the area and an integral part of the townscape character, particularly within conservation areas. The policies are therefore predicted to have **moderately positive effects** as they seek to protect these important sites, thus maintaining the significant contribution they make to landscape and townscape character.

BNDP8 is concerned with key views from and into the River Tweed corridor and the coastal strip. The River Tweed corridor is surrounded by the three conservation areas and therefore views into and out of the Tweed corridor are an integral part of the conservation areas forming part of the historic character and landscape of these areas. Similarly, key views into and out of the coastal strip form a significant part of the character and landscape of the conservation areas. The policy is predicted to have **moderate positive effects** on the areas landscape and historic townscape.

BNDP10 seeks to protect and enhance biodiversity. The NP area contains numerous sites of biodiversity importance. These form an integral part of the area's landscape character. Therefore, by protecting these sites the policy serves to also protect the landscape character of the NP area.

Overall, this set of policies is anticipated to have **moderately positive effects** on landscape as they seek to protect and enhance the NP area's rich landscape character and its historic townscapes.

### 5.7.3 Community facilities policies

BNDP12 is favourable with respect to landscape as allotments are embedded within the national landscape, and are rooted in cultural heritage.

### 5.7.4 Transport policies

Policies BNDP15 to BNDP18 support development proposals that facilitate a modal shift in transport. Walking and / or cycling (as opposed to driving ) through the area's rich landscapes and historic townscapes allows residents and visitors to appreciate them more fully. This is therefore likely to have the effect of enhancing access to and improving the appreciation of the NP area's rich landscapes and historic townscapes. New pedestrian / cycle routes may also help improve linkages between the different character areas of the landscape. Consequently, **minor positive effects** are anticipated.

### 5.7.5 Employment and Economy policies

Policy BNDP13 (Tourism and leisure) is likely to have **minor positive effects** on landscape as it seeks to attract tourists to the area, enabling more people to access and appreciate the beauty of the NP area's landscapes and historic townscapes. Any potential adverse effects are countered by the requirement that proposals be subject to BNDP2 and not result in adverse impacts on the amenity of adjacent uses.

The policy also requires adequate screening by utilising topography / vegetation or good quality landscaping to ensure no adverse effects on the landscape/ townscape.

### 5.7.6 Overall (cumulative) effects

This Plan is anticipated to have **moderately positive effects** on landscape as its policies seek to protect, and enhance access to the landscape and historic townscape of the NP area. Together, the policies ought to protect the important areas of landscape surrounding the urban area, as well as the important spaces that run through.

## 5.8 SEA Objective 5: Population and Housing

*Provide everyone with the opportunity to live in good quality, affordable housing which meets the needs of occupiers throughout their lives.*

### 5.8.1 Housing and the built environment

Policies BNDP2-BNDP5 address design of development and the public realm. They contain a number of design principles pertaining to materials, density and scale of development. BNDP3 promotes good quality design by requiring development proposals within Spittal Point, Berwick Quayside, Berwick

Infirmary, Maltings Car Park and Berwick Station, to be informed by BNP Design Code. Similarly, BNDP4 promotes a high-quality, well-designed public realm.

Policy BNDP5 pertains to development in the country side; defined as any area outside settlement boundaries (defined in the emerging NLP). The policy supports affordable housing on rural exception sites and re-use of redundant / disused buildings to provide housing. Therefore, this policy is likely to have positive effects on population and housing as it allows (subject to criteria within the NLP/BNP) housing development in the countryside, including affordable housing, which will help make these rural communities more sustainable.

Overall, this group of policies is predicted to have **minor positive effects** on population and housing as they seeks to ensure attractive well designed housing and public realm.

### 5.8.2 Natural and historic environment policies

Policy BNDP1 seeks to conserve and enhance the heritage assets of the plan area through the development management process. It includes the requirements that proposals should reflect the quality of the historic townscape (through design, materials, boundary treatment, soft and hard landscaping) and not require removal of trees forming part of the special character of the area. The policy potentially presents obstacles for new development within conservation areas and development / reuse of listed buildings. However, the requirements are not unreasonable and likely to enhance the value of developments in the area. On balance this policy is predicted to have **neutral effects** on housing.

Policies BNDP6, BNDP7 pertain to local green space (including parks, recreation grounds and promenades), open space and GI, seeking to protect and enhance these assets in the NP area. Again, these are likely to improve the attractiveness of the area and add value to development. Similarly, BNDP8, which is concerned with key views from and into the River Tweed corridor and the coastal strip is likely to facilitate the retention of open space and the associated benefits described above.

Overall, this set of policies is anticipated to have **minor positive effects** on housing and population as they seek to protect green and open spaces and enhance biodiversity; thus improving the attractiveness of the area and adding value to development as well as producing numerous health and wellbeing benefits for the local population.

### 5.8.3 Community facilities policies

BNDP12 (Allotments) are beneficial as they improve the wellbeing of the population.

#### 5.8.4 Transport policies

Policies BNDP15 to BNDP18 support development proposals that to facilitate a modal shift towards more sustainable modes of transport. Transport modes have multiple impacts on health; as a cause of road accidents, through contribution to air pollution, due to their contribution to climate change, and their influence on physical activity. The lack of physical activity due to over reliance on motorised transport has detrimental effects on health. Therefore, these policies are predicted to have **minor positive effects** on population as they seeking to reduce urban traffic and promote walking and cycling, thus improving the attractiveness of the NP area and providing net benefits to the wellbeing of the resident population.

#### 5.8.5 Employment and Economy policies

Policy BNDP13 (Tourism and leisure), is likely to have favourable (**minor positive**) effects on population as it seeks to improve the local economy and the jobs market with knock on effects on residents' ability to access good quality housing. Policy BNDP14 promotes development within Tweedmouth, Spittal and Newfields seeking to strengthen the vitality and viability of these areas.

#### 5.8.6 Overall (cumulative) effects

Several of the Plan policies are predicted to have positive effects by promoting well designed housing and public realm, facilitating affordable housing provision in the countryside and supporting sustainable transport. However, these effects are only likely to be **minor positive effects** with regards to the baseline position in relation to housing and population. This is due to a lack of additional housing allocations and therefore, the significance of effects is limited.

### 5.9 Appraisal of Option 2

Option 2 is based on the same Plan policies as Option 1 with two exceptions; namely the exclusion of policies BNDP6 and BNDP7 which designate 16 sites as LGS and a further 7 sites as POS, respectively. The LGS designation through neighbourhood plans allows communities to identify and protect green areas of particular importance to them. The NPPF (Paragraphs 101 to 103) introduced a Local Green Space designation (LGS) to protect local green areas of particular importance to local communities. Once designated, the LGS is subject to the same strong development restrictions as Green Belt, and new development here is ruled out other than in special circumstances. The other sites identified as important to the community in BNDP7 do not meet the LGS designation requirements but will be still offered a degree pf protection from future development through the POS designation. Under Option 2 the LGS sites in Table 0-1 retain the Protected Open Space designation through the emerging NLP and would not be designated as LGS. The additional 7 POS

sites are not safeguarded in Option 2. Therefore, under option 2, the 16 LGS sites will have a lower degree of protection and the 7 POS sites would not be safeguarded from encroachment from development. As a result, the positive effects associated with the BNP's designation of LGS (policy BNDP6) and POS (BNDP7) are somewhat diminished with minor positive effects anticipated where moderate positive effects are expected under Option 1 and neutral effects are expected where minor positives are predicted under Option 1. The appraisal scores associated with each SEA topic are shown in Table 5-1.

**Table 5.2 Overall effects of Option-2**

<i>SEA Topic:</i>	<i>Biodiversity</i>	<i>Climate change (adaptation)</i>	<i>Historic Environment</i>	<i>Landscape</i>	<i>Population &amp; Housing</i>
<b>Overall effects</b>	Minor +ve	Neutral	Minor +ve	Minor +ve	Neutral

## 5.10 Conclusions at this current stage

### 5.10.1 Summary of effects

This section summarises the overall effects of the BNP against each of the SEA Topics. It is important to differentiate between significant effects, which are predicted to lead to measurable changes in the baseline position, and those effects that are broadly positive or negative, but are less likely to lead to substantial changes. No significant effects have been identified as a result of the Neighbourhood Plan.

Table 5.3 summarises the overall effects of the policies within the draft NP for each SEA topic. The table also illustrates the overall effects associated with Option 2.

**Table 5.3: Summary of overall effects for each SEA Topic.**

<i>SEA Topic:</i>	<i>Biodiversity</i>	<i>Climate change (adaptation)</i>	<i>Historic Environment</i>	<i>Landscape</i>	<i>Population &amp; Housing</i>
<i>Overall effects</i>	Moderate +ve	Minor +ve	Moderate +ve	Moderate +ve	Minor +ve
<i>Option-1</i>	Moderate +ve	Minor +ve	Moderate +ve	Moderate +ve	Minor +ve
<i>Option-2</i>	Minor +ve	Neutral	Minor +ve	Minor +ve	Neutral

5.10.2 The Plan approach (Option 1) is predicted to score positively for all SEA topics, with moderate positive effects predicted with respect to biodiversity, the historic environment and landscape.

5.10.3 Moderately positive effects are anticipated with respect to landscape through Plan provisions seeking to protect, and enhance access to the landscape and historic townscape of the NP area.

5.10.4 Moderate positive effects are predicted for biodiversity as the Plan seeks to protect and enhance biodiversity through protection and designation of green space/ green infrastructure and open space. Additional benefits are generated by requiring new developments to contribute to the NCMS.

5.10.5 Minor positive effects are predicted for the population and housing theme due to Plan policies promoting well designed housing and public realm and facilitating affordable housing provision in the countryside.

5.10.6 Option-2 performs similarly to Option-1 but slightly less positively; with minor positive effects predicted for biodiversity, landscape and the historic

environment. Neutral effects are predicted for the climate change and the population and housing, SEA themes. The positive effects on the historic environment and climate change are less positive than in Option 1 as the OPS designation would offer a lesser degree of protection than the LGS designation and Option 1 safeguards a further 7 sites as POS.

### 5.11 Recommendations

It is recommended that policy BNDP5 include a reference to the importance of agricultural land, adding the proviso that development must not lead to loss of such land particularly within flood plains.

### 5.12 Monitoring

There is a requirement to present measures that could be used to monitor the likely significant effects of the Plan as identified through the SEA. No significant effects have been identified through the SEA and therefore, no additional monitoring indicators are considered necessary.

## 6. What are the next steps?

- 6.1.1 This Environmental Report should accompany a Regulation 14 version of the Berwick-upon-Tweed Neighbourhood Plan for consultation.
- 6.1.2 To ensure that the final Plan is informed by a robust SEA, the Plan has not yet been submitted to Northumberland County Council. It is important that stakeholders have sight of the Environmental Report before the Plan is submitted so that they are able to make additional representations on the draft Plan (that are informed by knowledge of the environmental impacts).
- 6.1.3 Subsequently, the Environmental Report will be consulted upon.
- 6.1.4 Following consultation, any additional representations made (both on the Environmental Report and the Plan itself) will be considered by the Neighbourhood Plan Steering Group. The Environmental Report will be updated as necessary to reflect any technical comments, and in response to Plan changes. In particular, it will be important to record how the recommendations made in this SA Report have been taken into consideration when finalising the Plan.
- 6.1.5 Following that consultation, the BNP will then be submitted to the Local Planning Authority, NCC, after any necessary updating of this Environmental Report if significant changes are made to the NP as a result of the Reg 13 consultation. This version will be the formal version submitted under Reg 15 of the Neighbourhood Plans General Regulations 2012.
- 6.1.6 NCC will consider whether the plan is suitable to go forward to Independent Examination in terms of the BNP meeting legal requirements and its compatibility with the Local Plan.
- 6.1.7 Subject to NCC's agreement, the BNP will then be subject to independent examination. The Examiner will consider whether the plan is appropriate having regard to national policy and whether it is in general conformity with local policies.
- 6.1.8 The Examiner will be able to recommend that the BNP is put forward for a referendum, or that it should be modified or that the proposal should be refused. NCC will then decide what should be done in light of the Examiner's report. Where the report recommends modifications to the plan, NCC will invite the BNP Steering Group to make modifications to the plan, which will be reflected in an updated Environmental Report. Where the Examiner's Report recommends that the proposal is to be refused, NCC will do so.
- 6.1.9 Where the examination is favourable, the BNP will then be subject to a referendum, organised by NCC.



6.1.10 If more than 50% of those who vote agree with the plan, then it will be passed to NCC with a request it is 'made'. Once 'made', the BNP will become part of the Development Plan for the County.

## Appendix A: Scoping Report