

Draft Kempsey Neighbourhood Plan

Strategic Environmental
Assessment Screening Opinion
and Addendum



December 2016

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1. Introduction

- 1.1. This screening report is designed to determine whether or not the content of Draft Kempsey Neighbourhood Plan requires a Strategic Environmental Assessment (SEA) in accordance with the European Directive 2001/42/EC and associated Environmental Assessment of Plans and Programmes Regulations 2004
- 1.2. The purpose of the Kempsey Neighbourhood Plan is to provide locally derived and agreed guidance which will help inform planning decisions and shape the future of the parish and other land and property interests within the designated Neighbourhood Plan Area.
- 1.3. The legislative background set out in Section 2 outlines the regulations that stipulate the need for this screening exercise. Section 3 then provides an overview of the Draft Kempsey Neighbourhood Plan, including the geographic area it applies to and a summary of the policies it contains. Section 4 examines the potential impact of the Kempsey Neighbourhood Plan on internationally designated wildlife sites and determines if the plan requires a Habitats Regulations Assessment (HRA). Section 5 then provides an SEA screening assessment of the Neighbourhood Plan, which determines if it is likely to result in any significant environmental effects and consequently require a full SEA. Finally, Section 6 presents the conclusions of the screening report and determines if a full HRA and/or SEA is required for the Draft Kempsey Neighbourhood Plan.

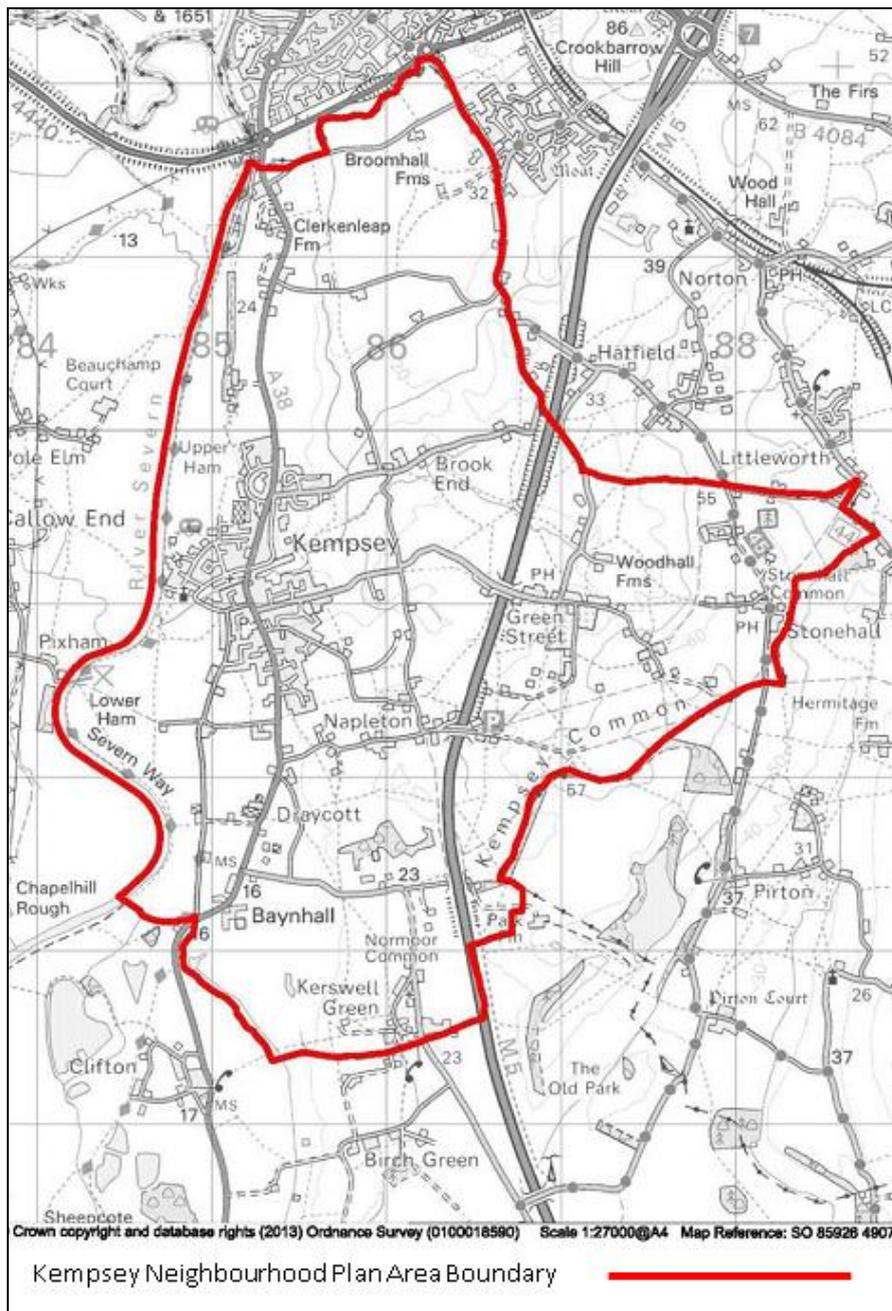
2. Legislative Background

- 2.1 The basis for SEA and Sustainability Appraisal (SA) legislation is European Directive 2001/42/EC and was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, or SEA Regulations.
- 2.2 SA's of the type that is required for development plan documents are not required for neighbourhood development plans. This is because they are not 'Local Plans', or development plan documents as defined by the 2004 Planning Act. Neighbourhood development plans have their own designation: they are neighbourhood development plans produced by qualifying bodies under the Localism Act. Even when a neighbourhood development plan is made by a local authority following a successful referendum and it becomes part of the development plan, it does not change its designation into a development plan document (although this does not mean it has any less status in terms of decision making).
- 2.3 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. The National Planning Practice Guidance (NPPG) states that a strategic environmental assessment may be required, for example, where:
- a neighbourhood plan allocates sites for development
 - the neighbourhood plan area contains sensitive natural or heritage assets that may be affected by the proposals in the plan
 - the neighbourhood plan may have significant environmental effects that have not already been considered and dealt with through the SA of the Local Plan for the area.
- 2.2. When deciding on whether the proposals are likely to have significant effects, the local authority is required to consult Historic England, Natural England and the Environment Agency. Where the local planning authority determines that the plan is unlikely to have significant environmental effects (and, accordingly, does not require an environmental assessment) it should prepare a statement of its reasons for the determination.

3. Draft Kempsey Neighbourhood Plan

- 3.1. On 1st March 2013 Kempsey Parish Council applied to Malvern Hills District Council (MHDC) for designation as a Neighbourhood Plan Area. This designation was approved on 2nd July 2013, and applies to the whole parish of Kempsey (Figure 1). The Draft Neighbourhood Plan has been prepared by a steering group of Parish Councillors and local residents, and is essentially a framework for guiding future development and growth in the area.

Figure 1: Designated Kempsey Neighbourhood Area



3.2. The Vision of the emerging Draft Kempsey Neighbourhood Plan is as follows:

“To ensure that Kempsey Parish continues to be an identifiable, sustainable rural community with facilities to cater for the needs of the residents and existing and new businesses.”

A total of 14 draft policies have been published as part of the plan, which address a variety of issues specific to the local area such as housing, landscape, heritage, community and transport. A brief overview of these policies is provided in Table 1 below.

Table 1: Summary of emerging policies in Draft Kempsey Neighbourhood Plan

Policy	Policy Summary
POLICY K1: New housing development in Kempsey.	New housing development in Kempsey will be permitted if it is on previously developed land, or involves the conversion, reuse or extension of existing buildings. New developments which lead to the loss of community/recreation facilities or employment opportunities will not be permitted. All new development must also accord with other relevant Kempsey Neighbourhood Plan and SWDP policies. The policy also revises the Kempsey settlement boundary to include planning approvals and proposed site allocations in the SWDP.
POLICY K2: New housing development in Kempsey parish outside of Kempsey village.	New housing developments outside of Kempsey settlement boundary will be strictly controlled. They will only be permitted if the new housing development is for use by rural workers, for affordable housing on an exception site to meet local need, to replace an existing dwelling (no more than 30% increase of an original footprint), to extend an existing dwelling or to convert/reuse existing buildings.
POLICY K3: Housing Mix	All housing developments over 5 units will be expected to provide a range of types, sizes and tenures of housing (in accordance with SWDP).
POLICY K4: Development in the Significant Gap	Development in the significant gap between Kempsey and Worcester will be strictly controlled in order to maintain a clear separation between the two. Acceptable development in this gap will include the reuse of rural buildings, agricultural/forestry related use, minor extensions to existing buildings and other open land uses.
POLICY K5: Designated Heritage Assets	Development proposals that conserve, enhance and respect the setting of the Parish’s Listed Buildings (Kempsey Neighbourhood Plan Appendix 2) and Conservation Area (Kempsey Neighbourhood Plan Figure 8) will be encouraged.

Policy	Policy Summary
<p>POLICY K6: Protecting Non-Designated Heritage Assets</p>	<p>Proposals which affect the listed non-designated heritage assets in the parish must demonstrate how they conserve and enhance the heritage asset.</p>
<p>POLICY K7: Protecting the Historic Landscape</p>	<p>The historic landscape of the parish will be protected for its visual, cultural, historical archaeological and architectural interest. To be approved, proposals should have regard to sustaining and enhancing a variety of views, areas of common land, green space and water channels (listed in Kempsey Neighbourhood Plan)</p>
<p>POLICY K8: Protection and improvement of Community Facilities</p>	<p>Proposals which lead to the loss or change of use of identified community facilities will not be permitted unless it is demonstrated the facility has become unviable or suitable alternative facilities are provided.</p>
<p>POLICY K9: New and Extended Community Facilities</p>	<p>Proposals for new, extended or improved community facilities will be permitted providing they are within or adjoining the settlement boundary, are appropriate to community needs, and have adequate parking and operational space. They must also be accessible by walking, cycling or public transport.</p>
<p>POLICY K10: Recreation and Sport</p>	<p>Existing sports facilities at Plovers Rise (K10A) will be protected, and any development proposed to enhance them will be supported.</p> <p>In addition, a ~6.3 hectare site to the west of Old Road South (K10B) is proposed to meet future community, recreation and sports needs. The policy also indicates that an adjacent site of approximately 3.7 hectares (to the east of Old Road South) may also be considered for housing development if required. This housing development will only be permitted if:</p> <ul style="list-style-type: none"> - It is required to secure the delivery of the 6.3ha community, recreation and sports site; - If a sufficient funding package for the community, recreation and sports site cannot be assembled without the enabling development; - The amount of enabling development is the minimum necessary to secure the delivery of the community, sports and recreation site. <p>Any housing development which occurs as a result of this policy would be additional to the allocations made by the SWDP.</p>

Policy	Policy Summary
<p>POLICY K11: Protecting Local Green Space</p>	<p>Local Green Space (identified in Kempsey Neighbourhood Plan Table 1 and Figure 13) will be protected, and development which may be harmful to these spaces will only be permitted in very special circumstances.</p>
<p>POLICY K12: Green Infrastructure</p>	<p>Development proposals which protect, extend and enhance the green infrastructure network (open spaces, water courses, commons, footpaths, lanes, banks, ditches, woodlands, hedgerows and multi-species grassland) of the parish will be encouraged.</p>
<p>POLICY K13:</p> <p>K13a: Development or de-development of land for employment uses within the Settlement Boundary</p> <p>K13b: Expansion Of existing Employment Sites outside the Settlement Boundary</p> <p>K13c: Farm Diversification</p>	<p>The development and redevelopment of land for employment uses in Kempsey will be permitted when proposals reuse existing buildings and not have adverse impact on residential amenity, traffic flows or highway safety. Proposals will also be supported where they are for the diversification of existing rural enterprise, are appropriate in scale and design to the area and where business operations will not have a significant adverse impact on the area.</p> <p>Expansion of existing employment sites will be permitted outside the settlement boundary where intensification of the site is proved to be unviable or unpractical.</p> <p>Proposals to diversify farm businesses for employment, tourism, leisure and recreation will be supported where the new use does not impede its agricultural undertaking, is appropriate to the areas rural character and reuses existing buildings if possible.</p>
<p>POLICY 14: Transport</p>	<p>Developer contributions will be sought wherever possible to support and improve transport links, highway safety and walking/cycling networks in Kempsey.</p>

4. Habitats Regulations Assessment Screening Opinion

- 4.1. Every Neighbourhood Plan requires screening to determine whether a SEA and/or HRA is required. If it is determined that an HRA is required for the Neighbourhood Plan, then an SEA will also automatically become a requirement. It is therefore logical that the first step in the screening exercise for the Kempsey Neighbourhood Plan is to establish if a HRA is required.
- 4.2. The Habitats Regulations Assessment (HRA) refers to the assessment required for any plan or project to assess the potential implications for European wildlife sites. The HRA therefore looks at whether the implementation of the plan or project would harm the habitats or species for which European wildlife sites are designated. The relevant European Wildlife sites designations are Special Protection Areas (SPA) and Special Areas of Conservation (SAC), which together form part of the Natura 2000 network.
- 4.3. In addition to SPAs and SACs, Ramsar sites are also designated areas which, as a matter of government policy, are to be treated in the same way as European wildlife sites (although they are not covered by the Habitats regulations). European wildlife sites and Ramsar sites are collectively known as internationally designated wildlife sites.
- 4.4. The legislation sets out a process to assess the potential implications of a plan on internationally designated sites. The first stage of this process is a “screening” exercise where the details of nearby internationally designated sites are assessed to see if there is the potential for the implementation of the Plan to have an impact on the site.
- 4.5. No internationally designated wildlife sites are located within the Kempsey Neighbourhood Plan area. For the purposes of this screening assessment however, sites within a 15km radius of the Kempsey Neighbourhood Plan area are assessed for potential impacts. There are two sites identified within this range; Breedon Hill SAC (approx. 12km to the South-east) and Lyppard Grange SAC (approx. 5km to the North-West). An overview of these sites can be found in Table 2.

Table 2: Summary of internationally designated wildlife sites within the plan area

Site	Description
Breedon Hill SAC	Breedon Hill SAC is an area of pasture woodland and ancient parkland situated approximately 4.5km to the South West of Evesham. The site provides habitat for the Violet Click Beetle <i>Limoniscus violaceus</i> beetle, which develops in the decaying wood either of very large, old hollow beech trees (Windsor Forest) or ash trees (Worcestershire/ Gloucestershire border sites). Currently the key site attributes which Natural England understands the species to require is related to the abundance and condition of the ancient trees on the designated site within which it develops.
Lyppard Grange SAC	Lyppard Grange SAC is located on the East outskirts of Worcester and is situated amongst a recent housing development on former pastoral farmland. The site is composed of two ponds in an area of grassland and scrub (public open space). The site provides habitat for Great Crested Newts <i>Triturus cristatus</i> , which are dependent on both the existing terrestrial habitat (to provide foraging areas and refuge) and on the aquatic habitat (for breeding).

- 4.6. The potential impact of development on both these sites was examined by a full HRA as part of the production of the South Worcestershire Development Plan. In the screening stage of the SWDP HRA, it was concluded that there was uncertainty with regard to the potential for significant effects on the two sites as a result of increased disturbance, in particular due to increased recreational activity. Concerns relating to the potential impact of proposed development on water levels and water quality at the Lyppard Grange SAC, which is based around a series of ponds, were also raised. As a result, the sites were progressed to the next stage of the HRA and a full Appropriate Assessment (AA) was conducted¹.
- 4.7. The AA concluded that the policies of the SWDP (including land allocations) were not likely to have adverse effects on the integrity of either Breedon Hill SAC or Lyppard Grange SAC. In addressing concerns relating to possible increased levels of disturbance at the SACs, it was concluded that the location of the sites in relation to proposed developments and also the availability of more suitable areas of open space for recreation in close proximity to the sensitive areas would keep potential impacts to a minimum. It was also deemed that the policies of the SWDP would sufficiently mitigate the potential impact of proposed developments on the water environment, leading to minimal effect on the SAC sites.

¹ Habitats Regulations Assessment (Appropriate Assessment) Report available at: http://www.swdevelopmentplan.org/wp-content/uploads/2012/11/PreSubmissionHR_AA_Report.pdf

- 4.8. The majority of the policies and land allocations featured in the Draft Kempsey Neighbourhood Plan are in conformity with those outlined by the SWDP. As these policies have already been subject to a full HRA assessment as described above, it can be concluded that the majority of policies within the Draft Kempsey Neighbourhood Plan will have no impact on internationally designated wildlife sites.
- 4.9. However, it is noted that the draft neighbourhood plan also proposes a portion of land which may be used for enabling housing development (as part of policy K10B) which is not in-line with the allocations made in the SWDP. This site was therefore not assessed as part of the HRA for the SWDP, and its potential impacts on the identified internationally designated wildlife sites have not been examined. A more thorough screening of this policy and its potential impacts on the two SAC's was therefore conducted, and can be found below (Tables 3 and 4).

Table 3: Assessment of possible effects of Kempsey Neighbourhood Plan on Breedon Hill SAC

	Breedon Hill SAC							
	Direct Habitat Loss	Impact on Protected Species	Air Quality	Water Quality	Water Quantity	Recreational Pressures	Change In Surrounding Land Use	Invasive Species
Is the Kempsey Neighbourhood Plan likely to impact site?	NO	NO	NO	NO	NO	NO	NO	NO
Possible effects in combination with other plans	None Identified							
Assessment of Effects	<p>The Breedon Hill SAC is situated approximately 12km from the Kempsey Neighbourhood Plan Area (direct distance). The significant distance between Breedon Hill SAC and the neighbourhood area therefore means any new development is unlikely to have a direct impact on the site (including on habitats, species, air quality, water quality, water quantity or surrounding land use). It is also considered that any new development in the Kempsey Neighbourhood area would not impact the Breedon Hill SAC through increased disturbance by recreational use, as the site is a considerable travelling distance from the plan area and sufficient open space is available for recreation within the parish itself. In summary, it is considered that the Kempsey Neighbourhood Plan will have no impact on the Breedon Hill SAC.</p>							

Table 4: Assessment of possible effects of Kempsey Neighbourhood Plan on Lyppard Grange SAC

	Lyppard Grange SAC						
	Direct Habitat Loss	Impact on Protected Species	Air Quality	Water Quality	Water Quantity	Recreational Pressures	Change In Surrounding Land Use
Is the Kempsey Neighbourhood Plan likely to impact site?	NO	NO	NO	NO	NO	NO	NO
Possible effects in combination with other plans	None Identified						
Assessment of Effects	<p>The Lyppard Grange SAC is situated approximately 5km from the Kempsey Neighbourhood Plan Area (direct distance). The distance between sites proposed for development in the Draft Kempsey Neighbourhood Plan and Lyppard Grange SAC means the resulting impact on the protected area is likely to be negligible (including in relation to habitat loss, impact on protected species, air quality and surrounding land use). It is also considered that any new development in the Kempsey Neighbourhood area would not impact the Breedon Hill SAC through increased disturbance by recreational use, as the site is a considerable travelling distance from the plan area and sufficient open space is available for recreation within the parish itself.</p> <p>With regards to potential impacts on hydrology, the HRA screening opinion conducted for the SWDP highlighted concerns that plan policies may potentially result in reduced water levels at Lyppard Grange SAC, which prompted a full AA to be conducted. This assessment however concluded that SWDP policies (when combined with outlined mitigation measures) will not have any adverse effects on the integrity of Lyppard Grange SAC (or indeed any other internationally designated wildlife sites in the plan area) through changes to water levels or water quality. Whilst the additional land proposed by Policy K10B was not included in this assessment, the scale of the site and its location in relation to the Lyppard Grange SAC (including their relationship geographically in the Severn catchment system) means it is highly unlikely that the additional allocation will have any impact on the SAC. It is therefore concluded that the additional development proposed by the Draft Kempsey Neighbourhood Plan will have no impact on Lyppard Grange SAC.</p>						

- 4.10. Based upon the assessment featured in Tables 3 and 4, it is concluded that the additional land allocation made in the Kempsey Neighbourhood Plan as part of Policy K10B is unlikely to have any significant impact on internationally designated wildlife sites.

HRA Screening Opinion

- 4.11. The HRA screening exercise has shown that the Kempsey Neighbourhood Plan alone, or in combination with other plans, is unlikely to have a significant effect on any internationally designated wildlife sites. There are no such sites within the parish itself, and for the two sites located within a 15km radius the potential impact is deemed to be negligible. As such, the recommendation is made that an **Appropriate Assessment (AA) is not required** for the Kempsey Neighbourhood Plan.

5. Strategic Environmental Assessment Screening Opinion

- 5.1. This screening report seeks to determine whether or not a Strategic Environmental Assessment (SEA) is required for the Kempsey Neighbourhood Plan in accordance with European and National legislation.
- 5.2. To establish if a plan needs to be accompanied by a full SEA, a “screening” assessment is required against a series of criteria which are set out in SEA Directive 2001/42/EC. Figure 2 sets out the screening procedure and how a plan should be assessed against the SEA Directive criteria. This outline procedure has then been applied to the emerging Draft Kempsey Neighbourhood Plan in Table 5.

Figure 2: Application of the SEA Directive to Plans and Programmes

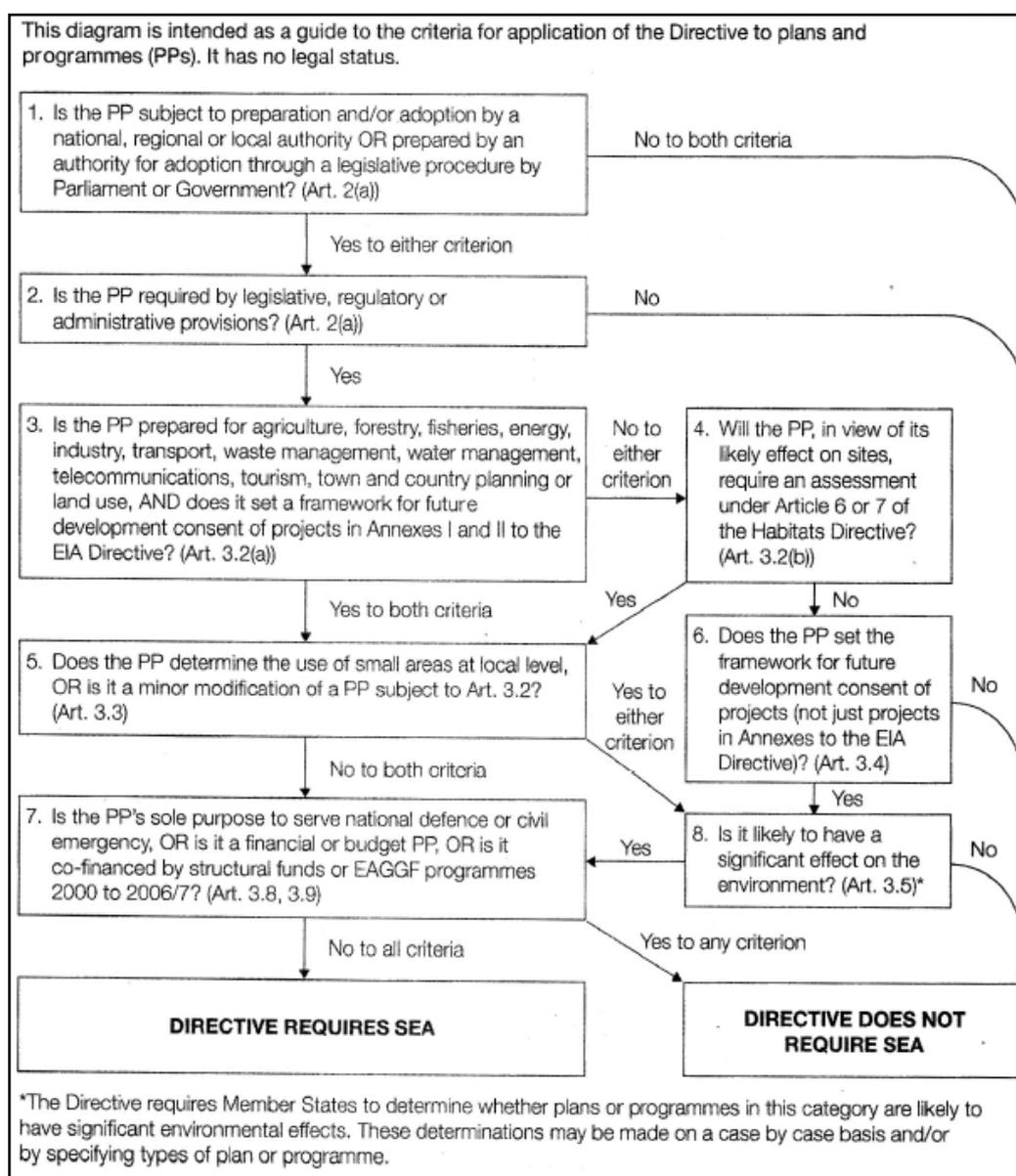


Table 5: Assessment of Neighbourhood Plan using SEA Directive Criteria

Stage	Y/N	Reason
1. Is the Kempsey Neighbourhood Plan subject to preparation and/or adoption by a national, regional or local authority OR prepared by an authority for adoption through a legislative procedure by Parliament or Government? (Art. 2(a))	Y	This is a Neighbourhood Plan that is being prepared by a qualifying body (Kempsey Parish Council) under the Localism Act 2011. If the plan is passed by means of a referendum, it will be formally adopted by the local Planning Authority and will hence become a statutory planning document. It will form part of the local development framework and so will have significant weight in planning decisions.
2. Is the Kempsey Neighbourhood Plan required by legislative, regulatory or administrative provisions? (Art. 2(a))	N	Neighbourhood Plans are not mandatory requirements, and the Kempsey Neighbourhood Plan is being prepared voluntarily by the local qualifying body in line with the provisions of the Localism Act. If the plan is adopted however it will form part of the statutory development plan, and it is therefore considered necessary to answer the following questions to determine if an SEA is required.
3. Is the Kempsey Neighbourhood Plan prepared for agriculture, forestry, fisheries, energy, industry, transport, waste management, water management, telecommunications, tourism, town and country planning or land use, AND does it set a framework for future development consent of projects in Annexes I and II to the EIA Directive? (Art 3.2(a))	Y	The plan is prepared for town and country planning, and sets out land use allocations (both in line with SWDP and additional sites).
4. Will the Kempsey Neighbourhood Plan, in view of its likely effect on sites, require an assessment for future development under Article 6 or 7 of the Habitats Directive? (Art. 3.2 (b))	N	See Screening Opinion for HRA in Section 4 of this report.

5. Does the Kempsey Neighbourhood Plan Determine the use of small areas at local level, OR is it a minor modification of a PP subject to Art. 3.2? (Art. 3.3)	Y	<p>The Kempsey Neighbourhood Plan allocates a number of sites for housing development, which are in conformity with the allocations made by the SWDP. It also allocates a site for community, recreation and sports use.</p> <p>As part of policy K10B the plan allocates land which could potentially be used for enabling housing development to deliver the community, recreation and sports site. This potential housing development is not included in the SWDP.</p>
6. Does the Kempsey Neighbourhood Plan set the framework for future development consent of projects (not just projects in annexes to the EIA Directive)? (Art 3.4)	Y	When adopted, the Kempsey Neighbourhood Plan will be a statutory planning document. It will form part of the Local Development Framework and so will have significant weight in planning decisions. The responsibility for issuing development consent will remain with the Local Authority.
7. Is the Kempsey Neighbourhood Plan's sole purpose to serve the national defence or civil emergency, OR is it a financial or budget PP, OR is it co-financed by structural funds or EAGGF programmes 2000 to 2006/7? (Art 3.8, 3.9)	N	Not Applicable
8. Is it likely to have a significant effect on the environment? (Art. 3.5)	Y	The Kempsey Neighbourhood Plan could potentially have a significant effect on the environment in its current form, mainly owing to the potential for housing development as part of Policy K10B. To investigate the likelihood of potential impacts further a case-by-case assessment has been conducted, the full results of which can be found in Table 6.

- 5.3. Based upon the initial screening carried out against the criteria in Table 5 above, the emerging Draft Kempsey Neighbourhood Plan could potentially have a significant effect on the environment. To explore these potential effects further, a case-by-case assessment was conducted. The criteria used in the undertaking of such an assessment are drawn from Article 3.5 (Annex II) of the SEA directive, and the results are shown in Table 6.

Table 6: Assessment of likelihood of significant effects on the environment (adapted from Article 3.5 [Annex II] of the SEA Directive)

Criteria for Determining the Likely Significance of Effects on the Environment (Annex II SEA Directive)	Likely to have significant Environmental Effects?	Summary of Significant Effects
1. The Characteristics of the plan, having regard to;		
<p>1a. the degree to which the Draft Kempsey Neighbourhood Plan sets a framework for projects and other activities, either with regard to the location, nature, size and operating conditions or by allocating resources</p>	Yes	<p>The Draft Kempsey Neighbourhood Plan makes a number of housing allocations which are in line with those made in the SWDP. However, as part of Policy K10B there is also the potential for an additional housing development on greenfield land (~3.7ha) to the east of Old Road South, which is not part of the SWDP allocations. This would be an enabling development, and may or may not be implemented depending on whether it is needed to secure the delivery of land for community, recreation and sports use to the west of Old Road South. If the housing development is required, the policy states that it must be of the minimum amount necessary to secure the associated community, recreation and sports site.</p> <p>Due to the uncertainty regarding the implementation and scale of this housing development, the possibility of significant environmental effects occurring as a result cannot be accurately assessed. Based on the precautionary principle therefore, it is concluded that this policy has the potential to cause some negative environmental impacts which may require further investigation.</p>
<p>1b. the degree to which the Draft Kempsey Neighbourhood Plan influences other plans and programmes including those in a hierarchy</p>	No	<p>Policies within the Draft Kempsey Neighbourhood Plan are generally in-line with those in the submitted SWDP. All environmental policies accord with submitted SWDP environmental policies and will work alongside this document, and the NPPF, in determining applications.</p>

Criteria for Determining the Likely Significance of Effects on the Environment (Annex II SEA Directive)	Likely to have significant Environmental Effects?	Summary of Significant Effects
1. The Characteristics of the plan, having regard to;		
1c. the relevance of the Draft Kempsey Neighbourhood Plan for the integration of environmental considerations in particular with a view to promoting sustainable development	Yes	The Neighbourhood Plan has regard to the objective of achieving sustainable development in the local area, in accord with higher level plans such as the SWDP and NPPF. Whilst the majority of the Draft Kempsey Neighbourhood Plan is in conformity with the strategic policies in the emerging South Worcestershire Development Plan, it also allocates additional land for a potential housing development. If implemented, this proposal will be required to investigate environmental considerations and support the delivery of sustainable development; however it was not examined as part of the Sustainability Appraisal for the Local Plan.
1d. environmental problems relevant to the Draft Kempsey Neighbourhood Plan	Yes	If implemented, the enabling housing development which is outlined in Policy K10B and located to the east of Old Road South may have the potential to cause negative environmental impacts. Depending on the size of this development, it may also trigger the Impact Risk Zone (IRZ) for the nearby Napleton Meadow SSSI (See Table 3: 2G). Based upon the uncertainty surrounding this site, the precautionary principle is adopted and it is concluded that this policy has the potential to cause some negative environmental impacts which may require further investigation.
1e. the relevance of the Draft Kempsey Neighbourhood Plan for the implementation of Community legislation on the environment (e.g. plans and programmes linked to waste-management or water protection).	No	The policies of the Draft Kempsey Neighbourhood Plan are not considered to be relevant to the implementation of European Community Legislation.

Criteria for Determining the Likely Significance of Effects on the Environment (Annex II SEA Directive)	Likely to have significant Environmental Effects?	Summary of Significant Effects
2. Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:		
2a. the probability, duration, frequency and reversibility of the effects	No	It is considered unlikely that there will be any irreversible damaging environmental impacts associated with the Draft Kempsey Neighbourhood Plan. The majority of policies seek to protect and enhance the environment and are likely to be beneficial rather than damaging.
2b. the cumulative nature of the effects	No	It is considered that the policies of the Draft Kempsey Neighbourhood Plan are unlikely to have a significant cumulative environmental effect.
2c. the transboundary nature of the effects,	No	There are no policies in the Draft Kempsey Neighbourhood Plan which are likely to have an environmental impact on areas outside of the plan area.
2d. the risks to human health or the environment (e.g. due to accidents),	No	It is considered that there will be no significant risks to human health or the environment as a result of policies in the Draft Kempsey Neighbourhood Plan.
2e. the magnitude and spatial extent of the effects (geographical area and size of the population likely to be affected)	No	The Kempsey Neighbourhood Plan applies to an area of 1,307 hectares (Figure 1), which has a resident population of 3,180 living in 1,352 households (2011 census). The policies of the neighbourhood plan apply to the entirety of this area, and are unlikely to effect areas beyond the neighbourhood boundary.

Criteria for Determining the Likely Significance of Effects on the Environment (Annex II SEA Directive)	Likely to have significant Environmental Effects?	Summary of Significant Effects
Characteristics of the effects and of the area likely to be affected, having regard, in particular, to:		
<p>2f. the value and vulnerability of the area likely to be affected due to;</p> <ul style="list-style-type: none"> - special natural characteristics or cultural heritage - exceeded environmental quality standards or limit values - Intensive land-use 	Yes	<p>The presence of a statutory natural or built environmental designation in or adjacent to a Neighbourhood Plan area could potentially result in a significant effect. The designations within the Draft Kempsey Neighbourhood Plan area, and the policies relating to them, are considered below.</p> <p>The Draft Kempsey Neighbourhood Plan identifies a number of assets in the plan area which are to be protected, including 3 scheduled ancient monuments, 28 listed buildings and 10 unlisted historic buildings. The plan itself features a number of policies (K5, K6 and K7) which seek to preserve and enhance both built and natural heritage assets, and it also recognises the existing conservation area as part of policy K5. A number of locally significant landscape assets are also identified, which the emerging plan seeks to sustain and enhance.</p> <p>The Draft Kempsey Neighbourhood Plan allocates land for potential enabling development as part of Policy K10. This allocation is additional to those made by the SWDP, and as such its potential impact on nearby heritage assets and the historic landscape characterisation was not considered as part of the SA, and further investigation may be required.</p>
<p>2g. the effects on areas or landscapes which have a recognised national, community or international protection status.</p>	Yes	<p>There are no internationally designated wildlife sites within the Kempsey Neighbourhood Plan area, and the plan is not likely to impact such sites located beyond its boundaries (See HRA Screening, Section 4).</p> <p>Two SSSI's are located either wholly or partially within the Kempsey Neighbourhood area.</p>

Criteria for Determining the Likely Significance of Effects on the Environment (Annex II SEA Directive)	Likely to have significant Environmental Effects?	Summary of Significant Effects
		<p>Napleton Meadow is a grassland meadow SSSI located within the Kempsey Neighbourhood Plan area. The Impact Risk Zone (IRZ) of this site, which denotes the area in which certain developments have the potential to cause significant damage to the protected site, applies to a large portion of the plan area. This includes the land proposed for possible housing development to the east of Old Road South as part of policy K10B (that was not featured or assessed as part of the SWDP), which is located approximately 800m to the south-west of the SSSI. At this proximity, guidance on IRZ's indicates that Natural England must be consulted on likely risks from "Any residential development of 50 or more houses outside existing settlements/urban areas". At present it is not certain if the enabling development of housing at K10B will be required, or how many dwellings the site will support if it is developed. Should the site be implemented however, it is likely that the number of dwellings could be in excess of 50, and as the site is located outside the settlement boundary the potential for negative impacts on the SSSI may require further investigation. A map showing the extent of the IRZ for Napleton Meadow in relation to the land proposed for possible housing development in Policy K10B can be found in Appendix 1.</p> <p>Ashmore Common SSSI is an area of marshy grassland which transects the southern Kempsey Neighbourhood boundary, with a significant proportion of the site falling within the plan area itself. Although no Kempsey Neighbourhood Plan land allocations trigger the IRZ of this site, any future proposals in the south of the Kempsey Neighbourhood Plan area should pay consideration to the potential for negative impacts on Ashmore Common.</p>

SEA Screening Opinion

- 5.4. Table 6 assesses the likelihood of significant environmental effects arising from the Draft Kempsey Neighbourhood Plan in its current form.
- 5.5. In general, the policies and allocations in the Draft Kempsey Neighbourhood Plan are in-line with the strategy of the emerging South Worcestershire Development Plan, which has been subject to a Sustainability Appraisal incorporating a Strategic Environmental Assessment. However, the land to the east of Old Road South which is proposed for potential enabling housing development (Policy K10B) was not featured in these assessments, and hence the likelihood of it having a significant environmental impact if included in the adopted neighbourhood plan has not been examined. This screening report has highlighted a number of general environmental concerns linked to this policy/proposal, as well as a specific potential risk to the nearby Napleton Meadow SSSI, which may require further examination.
- 5.6. Pending the responses of the consultation and the formal views of the statutory environmental bodies, the Draft Kempsey Neighbourhood Plan may require a full Strategic Environmental Assessment.

6. Representations from Consultation Bodies

- 6.1. The three statutory consultation bodies (Historic England, Environment Agency and Natural England) have been consulted under Regulation 9 (2)(b) to determine whether they agree with the conclusion of this screening opinion. A summary of their responses are presented below (Full responses can be found in Appendix 2).
- 6.2. The Environment Agency considered that the Draft Kempsey Neighbourhood Plan would not have any significant effects on any aspects of the environment within their remit, and therefore a full SEA would not be required.
- 6.3. Natural England considered that the Draft Kempsey Neighbourhood Plan would not have any significant effects on any aspects of the environment within their remit, and therefore a full SEA would not be required. Although the plan allocates land for development within an impact risk zone of a nearby SSSI, Natural England concluded that due to the nature, scale and location of this development there is unlikely to be any significant impact on the protected site.
- 6.4. Historic England (HE) agreed with the conclusions of the screening opinion that a full SEA is likely to be required for the Kempsey Neighbourhood Plan, primarily as a result of the 'enabling development' land allocation at K10B Old Road South/Pixham Ferry Lane. Their response highlights that the plan does not clearly assess the potential impacts of the allocation on local heritage assets (such as the Grade I listed Church of St Mary and the historic landscape characterisation) and consequently further investigation is likely to be required by means of a SEA.

7. Screening Opinion Conclusions

- 7.1. The preceding assessment exercises have examined whether the Draft Kempsey Neighbourhood Plan is likely to require a full Appropriate Assessment and Strategic Environmental Assessment. The conclusions of these exercises are presented here.
- 7.2. The HRA screening exercise featured in Section 4 concludes that the Draft Kempsey Neighbourhood Plan **does not require a full Habitats Regulations Assessment**. It is considered that the Kempsey Neighbourhood Plan, both alone and in combination with other plans, will have no significant effect on any internationally designated wildlife sites.
- 7.3. The SEA screening exercise featured in Section 5 indicates that the Draft Kempsey Neighbourhood plan may have significant environmental effects, predominantly owing to the proposal of land for potential enabling development to the east of Old Road South (Policy K10B). If this site is developed it could potentially have significant environmental effects which were not considered as part of the Sustainability Appraisal conducted for the SWDP, such as on the nearby Napleton Meadow SSSI or nearby heritage assets.
- 7.4. Taking into account the views of the statutory environmental bodies, it is concluded that the Draft Kempsey Neighbourhood Plan **may require a full Strategic Environmental Assessment**.

8. Addendum

- 8.1 The Draft Kempsey Neighbourhood Plan has now been prepared. This addendum provides an update on the need for a Strategic Environmental Assessment in light of the Heritage Statement relating to land at Pixham Ferry Lane, Kempsey (November 2016) and Historic England's revised conclusion that Policy K10B will not require a full SEA or Historic Impact Assessment.
- 8.2 Whilst the wording of Policies in the Draft Kempsey Neighbourhood Plan have been revised since the original SEA screening in December 2015, the overall "thrust" of the Policies remains broadly similar.

Policy K10B Future Community, Recreation and Sport

- 8.3 Draft Policy K10B proposes that land to the north of Pixham Ferry Lane and west of Old Road South is allocated community, sport and recreation provision. In order to develop this area for these purposes Draft Policy K10B indicates that enabling housing development may be considered on land to the east of Old Road South and north of Pixham Ferry Lane between Sunnyside Farm and Bight Farm. The Draft Policy says that such enabling development would only be supported where it can be demonstrated that:
- a) the enabling development is necessary to secure the delivery of site K10Bi for community, recreation and sports provision;
 - b) sufficient funding for the community, recreation and sport provision cannot be assembled without including such enabling development; and
 - c) the amount of enabling development is the minimum necessary to provide the identified community, recreation and sport provision on site K10Bi.
- 8.4 When consulted on the SEA Screening Opinion in December 2015 / January 2016 Historic England concluded that a SEA was likely to be required should the "enabling development" allocation at K10B Old Road South / Pixham Ferry Lane be pursued (see Appendix 2).
- 8.5 Following discussions, Historic England confirmed in February 2016 (see Appendix 3) that their concerns were not based on consideration that the potential enabling development as part of Policy K10B would have on the historic environment per se, rather that any potential impacts had not been considered in enough detail as part of the neighbourhood plan.
- 8.6 In a letter dated 22nd March 2016, Historic England confirmed that to address their concerns it may be appropriate to undertake a historic impact assessment (HIA) rather than a full SEA.
- 8.7 In November 2016, Kempsey Parish Council submitted a Heritage Statement to Heritage England prepared by Wardell Armstrong relating to proposed enabling development on land at Pixham Ferry Lane, Kempsey – attached as Appendix 4.

- 8.8 The Heritage Statement provides evidence that Policy K10B would not have a significant impact on designated heritage assets. The revised Draft Kempsey Neighbourhood Plan also provides evidence of the need for additional sports facilities and what alternative sites were considered and ruled out.
- 8.9 In an email dated 25th November 2016, Historic England concluded that the proposed enabling development would not have a damaging impact upon designated heritage assets. A full Strategic Environment Assessment would therefore not be required.
- 8.10 In light of the above, it is considered that the conclusion of the original screening opinion should be amended to the Draft Kempsey Neighbourhood Plan **does not require a full Strategic Environment Assessment**.

APPENDIX 2: Responses from Statutory Consultation Bodies***Response from the Environment Agency***

From: Cording, Carl [<mailto:carl.cording@environment-agency.gov.uk>]

Sent: 15 January 2016 11:37

To: Adam Lewis

Subject: RE: SEA Screening Opinion Consultation - Draft Welland and Kempsey Neighbourhood Plan.

Dear Adam,

I write with regards the above. We have no reason to consider either the Welland or Kempsey NPs would give rise to significant environmental effects and would not require SEA (based on those matters within our remit).

We attach an EA NP guidance document which we hope the NP teams find useful in shaping their resultant NPs.

Best regards,

Carl Cording

Planning Specialist

Sustainable Places

Environment Agency - Shropshire, Herefordshire, Worcestershire and Gloucestershire



722 4382 (Jabber - 51484) / 02030251484



carl.cording@environment-agency.gov.uk / Team email: shwgplanning@environment-agency.gov.uk



Riversmeet House, Newtown Industrial Estate, Northway Lane, Tewkesbury, Gloucestershire, GL20 8JG



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Response from Historic England

Adam Lewis
Development Plans and Conservation
Malvern Hills District Council
The Council House
Avenue Road
Malvern
Worcestershire
WR14 2AF

Our ref: 1601
Your ref:

Telephone: 0121
6256851

23 December 2015

by email only

Dear Sirs

SEA SCREENING OPINION CONSULTATION DECEMBER 2015 – DRAFT KEMPSEY NEIGHBOURHOOD PLAN

Thank you for your consultation received on 4 December 2015 in respect of the above.

For the purposes of consultation on SEA Screening Opinions, Historic England confines 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. Our comments are based on the information supplied with the screening request.

On the basis of the information supplied, including that set out in the draft neighbourhood plan, and in the context of the criteria set out in Schedule I of the Environmental Assessment Regulations [Annex II of 'SEA' Directive], Historic England is of the view that the preparation of a Strategic Environmental Assessment is likely to be required should the 'enabling development' land allocation at K10B Old Road South/Pixham Ferry Lane be pursued.

The site is a new 'enabling development' allocation to include residential development which is not included within the existing development plan. It is not clear how any impact has been assessed in respect of heritage assets, such as the Grade I listed Church of St Mary and the historic landscape characterisation, and the proposed allocation as well as any cumulative impact of housing allocation sites. It is noted that reference is made to



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K10/1 in the text but it is not clear from the draft neighbourhood plan Figures specifically what K10/1 is related to.

The views of the other statutory consultation bodies should be taken into account before the overall decision on the need for a SEA is made. If a decision is made to undertake a SEA, please note that Historic England has published guidance on Sustainability Appraisal/Strategic Environmental Assessment and the Historic Environment that is relevant to both local and neighbourhood planning and available at https://content.historicengland.org.uk/images-books/publications/strategic-environmental-assessment-sustainability-appraisal-historic-environment/SA_SEA_final.pdf/

Should it be agreed that an SEA is required Historic England would be pleased to input to scoping parameters as part of a further consultation.

I hope that this information is of use at this time.

Yours faithfully

Rosamund Worrall

Rosamund Worrall
Historic Environment Planning Adviser
E-mail: rosamund.worrall@HistoricEngland.org.uk



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Response from Natural England

Date: 27th January 2016
Our ref: 173583 Kempsey NP SEA Screening
Your ref:

Adam Lewis,
Graduate Planner,
Development Plans and Conservation,
Malvern Hills District Council,
The Council House,
Avenue Road, Malvern,
Worcestershire,
WR14 2AF
By email only: adam.lewis@malvern hills.gov.uk



Customer Services
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Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Mr Lewis,

Kempsey Neighbourhood Plan: Strategic Environmental Assessment and Habitats Regulation Assessment Screening

Thank you for your consultation on the above dated and received on the 4th December 2015.

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.

Strategic Environmental Assessment

Where Neighbourhood Plans could have significant environmental effects, they may require a Strategic Environmental Assessment (SEA) under the Environment Assessment of Plans and Programmes Regulations 2004. Further guidance on deciding whether the proposals are likely to have significant environmental effects and the requirements for consulting Natural England on SEA are set out in the National Planning Practice Guidance at:

<http://planningguidance.planningportal.gov.uk/blog/guidance/strategic-environmental-assessment-and-sustainability-appraisal/does-a-neighbourhood-plan-require-a-sustainability-appraisal/>

Natural England welcomes the production of an SEA Screening Report and notes the Local Planning Authorities conclusion that the draft neighbourhood plan may require a full SEA as Policy 10B supports development within one of our impact risk zones. Having considered the nature, scale and location of that potential development Natural England advises that there is unlikely to be an impact on Napleton Meadows Site of Special Scientific Interest. We therefore advise that based upon the designations for which we are responsible an **SEA is not required**.

Habitat Regulations Assessment

Where a Neighbourhood Plan could potentially lead to significant environmental effects it will be necessary to screen the Plan in relation to the Habitats and Species Regulations (2010), as amended (the 'Habitats Regulations'). One of the basic conditions that will be tested at Examination is whether the making of the plan is compatible with European obligations and this includes requirements relating to the Habitats Directive.

In relation to the Habitats Regulations, a Neighbourhood Plan cannot progress if the likelihood of significant effects on any European Site, either alone (or in combination with other plans and projects) cannot be ruled out (see Schedule 2, The Neighbourhood Planning (General) Regulations 2012). Therefore measures may need to be incorporated into the Neighbourhood Plan to ensure that any likely significant effects are avoided in order to secure

compliance with the Regulations. A screening exercise should be undertaken if there is any doubt about the possible effects of the Plan on European protected sites. This will be particularly important if a Neighbourhood Plan is to progress before a Local Plan has been adopted and/or the Neighbourhood Plan proposes development which has not been assessed and/or included in the Habitats Regulations Assessment for the Local Plan.

Natural England welcomes the consideration given to the Habitats Regulations. We are satisfied that the conclusion of the Local Planning Authority (as competent authority) that there are no likely significant effects on European sites is appropriate, and therefore advise that **further Habitats Regulations Assessment is not required.**

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.

For any queries relating to the specific advice in this letter only please contact Jamie Melvin on 020 802 61025. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

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.

Yours sincerely,

Mr Jamie Melvin
Planning Adviser
South Mercia Team

APPENDIX 3: Further Responses from Historic England

*Kempsey SEA Screening Opinion – HE Response
17th February 2016*

Dear Adam

Please see further information below in respect of my letter of 23 December 2015, which sets out in more detail as to how HE reached its conclusion that an SEA would be required. I hope that this is of use to you at this time.

Policy Background

Development Framework: Malvern Hills Local Plan Adopted 2006 and South Worcs Development Plan moving towards examination stage.

Proposal

Draft Kempsey Neighbourhood Plan includes additional development site, including 'enabling' residential development (Policy K10/B), which is not currently being considered as part of the SWDP allocations and has not been subject to SEA previously.

The K10/B allocation would provide for enabling development of an unknown quantity in order to fund sports facilities for the community. There is no evidence base as part of the draft neighbourhood plan (NP) to clearly demonstrate a) a need for those facilities; b) what alternative sites have been considered and ruled out; and, c) what heritage impact considerations have been taken into account.

The draft NP background information (p37 last paragraph) states that "To enable this land to be acquired for the recreation there will be further housing west of Old Road South, adjacent to Pixham Ferry Lane, also outside the settlement boundary". The SWDP housing land allocations includes sites immediately adjoining the southern part of this western side of Kempsey, and north of the allocated NP site K10/B. A field would separate the SWDP allocations and the NP allocation K10/B.

Heritage assessment

The K10/B sites adjoin the Lower Ham to the western boundary. Lower and Upper Hams are functional floodplain and have been used as such historically and as grazing land when not flooded. The sites are read with the wider countryside area which includes farmsteads and the area will have been considered as part of the Worcestershire historic landscape characterisation project so further information and consideration of that heritage asset would need to be provided since impact is not clear at present.

In addition, Grade I Church of St Mary is situated to the north of the site. Whilst some distance away, the Church has a substantial 15th Century tower of some 82ft high which is clearly visible from within the landscape surrounding the west side of Kempsey including the proposed K10/B sites. It is unclear as to how views from the church tower to the historic landscape would be affected by the proposed development due to insufficient information being available.

There is also a scheduled monument, the Churchyard Cross, within the churchyard of St Mary the Virgin which is unlikely to be adversely impacted setting wise through the proposed NP K10/B allocation site.

Conclusion and SEA recommendation

Overall, it is not apparent that the setting of the Church of St Mary's and the context of the historic landscape has been considered in respect of the NP allocation K10/B. In addition, the cumulative impact of the proposed SWDP housing allocation sites and NP allocation K10/B on the heritage assets has to be taken into consideration. The information submitted does not demonstrate that this has been undertaken.

As such, based on the information available at this time, the impact of the proposed NP allocation K10/B is likely to have a significant impact on the historic environment and cultural heritage and an SEA is likely to be required if NP allocation K10/B is pursued.

Kind regards, Ros

Rosamund Worrall
Historic Environment Planning Adviser
Planning Group, West Midlands
The Axis | 10 Holliday Street | Birmingham B1 1TG

Tel: 0121 625 6851

Summary of Points of Concerns

Lack of Evidence

There is no evidence base in the Neighbourhood Plan to demonstrate:

- The need for the sports facilities
- What alternative sites have been considered and ruled out
- What heritage impact considerations have been taken into account

Impact on Historic Landscape

- The K10/B sites adjoin the Lower Ham to the western boundary. Lower and Upper Hams are functional floodplain and have been used as such historically and as grazing land when not flooded. The sites are read with the wider countryside area which includes farmsteads and the area will have been considered as part of the Worcestershire historic landscape characterisation project so further information and consideration of that heritage asset would need to be provided since impact is not clear at present.

Impact on Grade 1 Listed Church

- The Church has a substantial 15th Century tower of some 82ft high which is clearly visible from within the landscape surrounding the west side of Kempsey including the proposed K10/B sites.
- It is unclear as to how views from the church tower to the historic landscape would be affected by the proposed development due to insufficient information being available.

*Kempsey SEA Screening Opinion – HE Response
22nd March 2016*



Historic England

Mrs S Baxter
Clerk and Financial Officer
Kempsey Parish Council

kempseyparishcouncil@gmail.com

by email only

Our ref: 1601

Your ref:

Telephone: 0121 6256851

Email: west.midlands
@historicengland.org.uk

22 March 2016

Dear Mrs Baxter

SEA SCREENING OPINION CONSULTATION DECEMBER 2015 – DRAFT KEMPSEY NEIGHBOURHOOD PLAN

Thank you for your letter, and associated information, of 26 February 2016 received on 29 February 2016 in relation to the above.

I understand from your correspondence that you are seeking confirmation as to whether a SEA is required or not since there will be a substantial cost involved.

As set out in our response to Malvern Hills District Council the housing allocation site contained within the Neighbourhood Plan has not been subject to any assessment which, taking into account the potential impact on the historic environment and heritage assets and their setting, would need to be undertaken. As discussed with Adam Lewis at Malvern Hills DC and with Michael Biddle of the working party in February if Natural England and the Environment Agency have no concerns about the site then it may be appropriate to go down the route of a historic impact assessment to establish the impact of the proposals and form relevant information for a SEA.

In terms of the information you have sent in, it is the same information that we provided advice on. The site proposed may be adjacent to sites allocated in SWDP but extend

further away from the village and have not previously been assessed through an SEA or SA. In addition, while you provide an explanation of how the development may occur, that is not what is set out in the plan. If the allocation proceeds it may be appropriate to amend the proposals map to demonstrate which area of land would be development for housing and which area would be for the proposed playing field and community centre, all of which could impact on the historic environment.

Historic landscape characterisation work has been undertaken for the area with input from a Jack Hanson who works for Locus Consulting. Since they have knowledge of the area and good experience of the neighbourhood plan process it would be worth contacting them in the first instance to establish whether Locus could advise on, and/or assist you with, a historic impact assessment of the K10B site allocation. Contact details are as follows:

Jack Hanson, Senior Heritage Consultant, Locus Consulting : t. [REDACTED].

I am aware that the Kempsey pre-submission Reg 14 consultation is out at present and my colleague Pete Boland, Historic Places Adviser will be responding to Malvern Hills DC in due course.

I hope that this information is of use at this time.

Yours sincerely

Rosamund Worrall

Rosamund Worrall
Historic Environment Planning Adviser
E-mail: rosamund.worrall@HistoricEngland.org.uk

*Kempsey SEA Screening Opinion – HE Response
25th November 2016*

From: Boland, Peter [<mailto:Peter.Boland@HistoricEngland.org.uk>]
Sent: 25 November 2016 11:07
To: Webster, Jonathan <jwebster@wardell-armstrong.com>
Cc: Worrall, Rosamund <Rosamund.Worrall@HistoricEngland.org.uk>
Subject: RE: WSM 67970 Land north of Pixham Ferry Lane, Kempsey Heritage Statement

Hello Jonathan, Thank you for the report which I have read with interest. In my view it presents a sound analysis and I concur with the conclusion drawn that the proposal will have no damaging impact upon designated heritage assets.

Thank you.

Pete Boland

Historic Places Adviser | West Midlands

Historic England | The Axis

10 Holliday Street | Birmingham B1 1TG

Tel: 0121 625 6887

APPENDIX 4: Heritage Statement – Land at Pixham Ferry Lane, Kempsey

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LAND AT PIXHAM FERRY LANE, KEMPSEY, WORCESTERSHIRE

HERITAGE STATEMENT

NOVEMBER 2016

WSM 67970

your earth our world



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DATE ISSUED: NOVEMBER 2016
JOB NUMBER: BM11241
HER REFERENCE: WSM 67970
REPORT NUMBER: 002

LAND AT PIXHAM FERRY LANE, KEMPSEY, WORCESTERSHIRE

HERITAGE STATEMENT

PREPARED BY:

Alice Howell Heritage Consultant

CHECKED BY:

Charlotte Dawson Principal Archaeologist

APPROVED BY:

Dave Hodgkinson Technical Director

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APPENDICES

Appendix 1	Assessment Methodology
Appendix 2	Site Visit Plates

DRAWINGS

Figure 1	Designated Heritage Assets
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1 INTRODUCTION

- 1.1 This report has been prepared in respect to development proposals on land at Pixham Ferry Lane, Kempsey, Worcestershire (NGR SO 84985 48358). Development proposals comprise a sports facility and a housing development.
- 1.2 The proposed development has the potential to impact upon the setting of the Grade I Listed Church of St Mary, and Kempsey Conservation Area, see Figure 1. This report provides a detailed assessment of the significance and setting of the designated assets potentially affected in order to determine the level of harm which may be experienced, if any.
- 1.3 The assessment was undertaken following the Standards and Guidance of the Chartered Institute for Archaeologists (CIfA 2014) and in accordance with terminology expressed within the National Planning Policy Framework. Historic England guidance on the setting of heritage assets has also been considered (Historic England 2011 & 2015). Historic England's *Conservation Principles, Policies and Guidance* (2008) will also be utilised.

2 DEFINITIONS OF TERMS AND HERITAGE PLANNING POLICY CONTEXT

- 2.1 A heritage asset is defined in the National Planning Policy Framework (NPPF) as *'a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest'* (NPPF page:52).
- 2.2 The significance of a heritage asset is defined within the NPPF as *'the value of a heritage asset to this and future generations because of its heritage interest. This interest may be archaeological, architectural, artistic or historic. Significance derives not only from the physical fabric of a heritage asset but also from its setting'* (NPPF page:56).
- 2.3 The setting of a heritage asset is defined as *'the surroundings within which it is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of setting can make a positive or negative contribution to the significance of a heritage asset, may affect the ability to appreciate that significance or may be neutral'* (NPPF page:56).
- 2.4 Where heritage assets are to be affected by development, *'local authorities should require the applicant to describe the significance of the assets affected, including the contribution made to the significance of the asset by its setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance'* (NPPF para: 128).

National Heritage Legislation

- 2.5 Designated heritage assets protected by statutory legislation comprise Scheduled Monuments, Protected Wrecks, Listed Buildings and Conservation Areas; nationally significant archaeological sites, monuments and structures are protected under the Ancient Monuments and Archaeological Areas Act (1979).
- 2.6 Listed Buildings and Conservation Areas are protected under the Planning (Listed Building and Conservation Areas) Act (1990). In relation to development proposals, the act states that *'in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the secretary of state shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses'* (section 66).

- 2.7 Non-statutory designated heritage assets, comprising Registered Parks and Gardens and Registered Battlefields, are protected under national and local planning policy only. This is also the case for the remainder of the archaeological resource; entries onto a historic environment record or sites and monument record as well as previously unknown features which may be recorded during the course of data collection in respect to a given development proposal.
- 2.8 In determining applications, NPPF stipulates that *'great weight'* should be given to the assets conservation and that *'substantial harm to or loss of a grade II Listed Building, Park or Garden should be exceptional'* whilst *'substantial harm to or loss of assets of highest significance, notably Scheduled Monuments, protected wreck sites, battlefields, Grade I and II* listed Buildings and Grade I and II* Parks and Gardens, and World Heritage Sites, should be wholly exceptional'* (NPPF para:132).
- 2.9 Developments where substantial harm to or total loss of significance of a heritage asset should be assessed against specific tests and should deliver substantial public benefits which outweigh any loss or harm (NPPF para:133). Less than substantial harm to a designated asset would require public benefits including the securement of an optimum viable use (NPPF para:134). Impacts to the significance of non-designated assets will require a balanced judgement based on the level of significance and the scale of harm (NPPF para:135), although non-designated assets which are of equivalent significance to designated assets will be considered as such (NPPF para:139).

3 ASSESSMENT METHODOLOGY

- 3.1 The term 'Site' is used to refer to the application area.
- 3.2 In order to inform this assessment baseline data was obtained from the following:
- Wardell Armstrong Heritage Impact Assessment (Wardell Armstrong 2016);
 - Worcestershire Historic Environment Record (HER); and
 - The National Heritage List for England (Historic England website).
- 3.3 A description of the significance of each asset potentially affected by the proposed development should be provided in order to satisfy the requirements of the NPPF. This should include an assessment of the contribution made to the significance of the asset by its setting.
- 3.4 Under the values presented within the Historic England's *Conservation Principles, Policies and Guidance* (2008) this significance can be evidential, historical, aesthetic or communal.
- 3.5 In respect of identifying the importance of setting to the identified significance of a heritage asset, Historic England's guidance presented in the *Setting of Heritage Assets* (2015) will be utilised; specifically 'what matters and why' (2015:7). A non-exhaustive list provided within the document (2015:9) identifies themes such as:
- physical surrounding such as topography, the grain of surrounding streetscapes and formal design;
 - land use;
 - history and degree of change over time;
 - sense of enclosure, seclusion, intimacy or privacy; and
 - views from, towards, through, across and including the asset.
- 3.6 The guidance within these Historic England publications will be used alongside the DMRB methodology for assessing the significance of impacts, see Appendix 1.

4 BASELINE ASSESSMENT

Brief Historic Context

- 4.1 A detailed archaeological and historical background of the Site is presented in a Heritage Impact Assessment by Wardell Armstrong 2016 (Wardell Armstrong 2016).
- 4.2 There was settlement at Kempsey by at least c. AD799, as documented when thirty manses belonging to the 'monasterium' called 'Kemesie' were given by Coenwulf, King of Mercia, to Abbot Balthun (Napthan 2005, 4).
- 4.3 During the medieval period, the settlement was listed in the Domesday Book, and included in the Parish of Powick in 1086, where it was held by the Bishop of Worcester. His palace, which was located approximately 475m north of the Site, was demolished by 1695. The core of the settlement would have likely been centred around the parish church, the Church of St Mary, located 445m north of the Site. The church appears to have developed from a 12th century aisle-less cruciform church (*ibid*). In 1327, an outbreak of the Black Death severely depleted the population of the settlement; only 86 inhabitants (15%) survived (Malvern Hills District Council 2008, 6).
- 4.4 By the late 18th century/ early 19th century, Kempsey comprised a mix of small labourers' cottages and large country houses of which the latter were "*inhabited mainly by retired colonels or even generals*" (St Mary's Church 1984, 22). Within Kempsey, there were several larger houses, including: the Nash with associated landscaped park; Bank House which was the seat of William Baker esq. in 1766 and was eventually demolished for the Byefields Housing estate in 1977 (*ibid*, 58); the Lawns, thought to have been built by General Henderson, and became the property of the Temples by 1826 (*ibid*, 67); and Draycott House, which passed to Thomas Wrenford in the 1780s.

Site Visit

- 4.5 A Site visit was undertaken in November 2016.
- 4.6 The Site was divided into two sections by the Old Road South, which is aligned north to south. Both sections of the Site existed as fields, and both were bounded by hedgerows. The western part of the Site was cultivated and in arable use, whilst the eastern part had been left as fallow (see Appendix 2 plates 1 and 2). To the south, the Site was bounded by Pixham Ferry Lane; both Pixham Ferry Lane and Old Road South were sunken.

- 4.7 To the east of the Site, a new housing estate was being built at the time of the survey (Taylor Wimpey) (see Appendix 2 plate 3). To the south and west, there was agricultural land.
- 4.8 From the western part of the Site, only the tower of the Church of St Mary was visible between trees which surrounded the church, and which provided substantial screening (see Appendix 2 plate 4). From the eastern part of the Site, views of the tower of the church were only possible from the very western part, due to the intervening buildings and vegetation (see Appendix 2 plate 5). Notably, the church was not visible from a public footpath bounding the Site to the east.
- 4.9 From the graveyard, the Site was not visible due to the intervening topography and vegetation (see Appendix 2 plate 6). Directly to the south of the graveyard, was a water management works.
- 4.10 Long distance views of the church were limited to views of the tower and roof from public footpaths to the south of the asset; views which the Site would not intervene within (see Appendix 2 plate 7).
- 4.11 There was no inter-visibility between the Site and Kempsey Conservation Area due to the intervening topography, vegetation and buildings.

5 SIGNIFICANCE AND SETTING ASSESSMENT

5.1 The following assessment adheres to guidance published by Historic England (2008) 'Conservation Principles'.

5.2 Historic England (2008) states that:

- *evidential value derives from the potential of a place to yield evidence about past human activity;*
- *historical value derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative;*
- *aesthetic value derives from the ways in which people draw sensory and intellectual stimulation from a place; and*
- *communal value derives from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory.*

Church of St Mary (reference 1157621)

5.3 The values that contribute to the significance of the church are derived from its evidential, historical, aesthetic and communal values, which are assessed below.

Evidential value

5.4 The building holds high evidential value for its fabric which informs upon the origins and evolution of the building. The materials used, the construction techniques employed, and the evolution over the building over time are contained within its fabric.

5.5 The ground below the church and its associated graveyard are likely to hold information such as archaeological remains, which could add to our understanding of the development of the settlement.

Historical value

5.6 The church holds high historical value. First constructed in the 12th century, it would have likely been the focus for settlement during the medieval period. The relationship between the church and the inhabitants is visible in the physical remains of the medieval dwellings and adds to our understanding of how settlement developed and the role of the clergy in day-to-day life. The tower of the church was rebuilt in the late

15th century, and reflects the religious importance and the medieval wealth of the village.

- 5.7 Its historic value is reflected in its Grade I listed status.

Aesthetic value

- 5.8 The church is of high aesthetic value. It represents a fine example of church architecture, and reflects the development of church architecture. The structure developed from a 12th century aisle-less cruciform plan, which was largely rebuilt in the 15th century.

- 5.9 Its aesthetic value is reflected in its Grade I listed status.

Communal value

- 5.10 As the parish church of Kempsey, the church is of high communal value, as it continues to be a place of worship and burial for the religious community.

Setting and its contribution to significance

- 5.11 The church is situated within a tree-filled graveyard located at the western edge of the village. The graveyard provides a setting in which the architectural detailing and scale of the church can be appreciated. The extensive cover of trees within the graveyard result in outward views being screened.

- 5.12 To the north of the church, the historic village buildings are at a distance and characterised by low roofs and simple design; which emphasises the presence and dominance of the church.

- 5.13 To the west, the open fields provide an agricultural and semi-rural setting to the church. However, this is not visible from within the graveyard itself, due to the screening effect of the trees. The rural setting is best appreciated from the public footpaths west and south of the church, where there are clear views westwards, towards the Malvern Hills.

- 5.14 In respect of long views of the asset, the church can be appreciated from the footpaths to the south, which allows views of the tower and roof; visible between the trees located in the graveyard. The tower is also visible as one travels along Pixham Ferry Lane (west of Old Road South), between the hedgerow, although in the summer months, this visibility would likely be greatly reduced due to the vegetation.

- 5.15 Overall, the setting of the church is considered to contribute towards its significance.

Impact

- 5.16 The proposed development is located 445m south of the church. It would not impact on the evidential, historical, aesthetic or communal values of the asset.
- 5.17 In respect of setting, the proposals would not be visible from the asset or its graveyard due to the intervening vegetation within the vicinity. The immediate fields surrounding the graveyard to the south and west, which contribute to the semi-rural setting of the church, would remain unaltered.
- 5.18 Although development within the western section of the Site would constitute change from the existing agricultural nature to playing fields and a nature reserve, the area would still retain a sense of greenness and openness. Due to the nature of the proposed playing fields and nature reserve, the tower of the church would remain visible as one travels along Pixham Ferry Lane, to the west of Old Road South.
- 5.19 The long-distance views of the church from the footpaths in the south would remain unaltered and there would be no in-combination views of the church with the proposed development.
- 5.20 Therefore, the impact of the proposed development on the church is considered to be no change. On an asset of high significance, the magnitude of impact would be **neutral**.

Cumulative Impact

- 5.21 In respect of long term impacts (operational impacts) to the church, the cumulative impact of this proposed development and the proposed South Worcestershire Development Plan Housing Allocation sites SWDP 59/8 and 59/8a has been considered.
- 5.22 The SWDP site assessment determined that sites 59/8 and 59/8a would not have a detrimental impact upon Listed Buildings.
- 5.23 Two separate planning applications covering the SWDP sites 59/8 and 59/8a have been decided upon through planning (14/00021/OUT and 13/01130/OUT).
- 5.24 Planning application 13/01130/OUT did not have a heritage and archaeology statement as part of the application.
- 5.25 An Archaeological and Heritage Assessment written in support of Planning application 14/00021/OUT assessed the listed buildings and concluded that the proposed

development would not have any significant impact upon the setting of the assets (The Environmental Dimension Partnership 2013).

5.26 Overall therefore, no cumulative impacts to the church are anticipated.

Kempsey Conservation Area

5.27 The values that contribute to the significance of the Conservation Area are derived from its evidential, historical and aesthetic values, which are assessed below.

Evidential value

5.28 Kempsey has high evidential value for the extant medieval remains of the original village which was focussed around the Church of St Mary. The below-ground remains, as well as archaeological deposits have the potential to inform upon the type of buildings as well as material used and building techniques. They could also contribute to our understanding of social organisation during this time, and medieval day-to-day life such as what foods were produced and eaten, and evidence of employment.

Historical value

5.29 Kempsey has medium historical value derived from its long history as a settlement. It was first documented in AD799, and it is known that the medieval village was focussed around the Church of St Mary, until at least the 14th century, when the Black Plague spread through the village.

5.30 From the 18th century onwards, Kempsey became a desirable place to live, and large country houses were built. This encouraged the rise of a range of minor service industries and business such as workshops, bakeries and public houses.

Aesthetic value

5.31 The Conservation Area has medium aesthetic value for its mix of smaller, 17th century worker cottages which illustrate the vernacular architecture. This is in contrast to the larger Georgian and Victorian gentry houses which reflect the increase in wealth which was generated from the 19th century onwards.

5.32 The fields abutting the village, as well as the hedgerows and trees, contribute to the rural attractiveness of the village.

Setting and its contribution to significance

- 5.33 Kempsey is situated low in the landscape, and is dominated by the River Severn and its floodplains. The tree-lined banks of Hatfield Brook, which flows through the village, form an immediate setting for the settlement.
- 5.34 To the west of the village, the Malvern Hills provide a distant backdrop.
- 5.35 As it is set low in the landscape and due to so many trees, Kempsey is not visually prominent. In respect of views into and out of the Conservation Area, these are local and intimate (Malvern Hills District Council 2008).
- 5.36 Whilst the immediate surrounding landscape of the Conservation Area is considered to contribute to its significance, the wider landscape is not.

Impact

- 5.37 The proposed development is located 245m south of the Conservation Area. It would not impact on the evidential, historical or aesthetic values of the asset.
- 5.38 In respect of setting, due to the low-lying nature of the village and the vegetation which screens views into and out of the Conservation Area, it is considered that the proposed development would not impact upon the Conservation Area. The setting of the Conservation Area is limited to the immediate fields surrounding the village, which would not be altered by the proposed development.
- 5.39 Therefore, the impact of the proposed development on the Conservation Area is considered to be no change. On an asset of medium significance, the magnitude of impact would be **neutral**.

Cumulative Impact

- 5.40 In respect of long term impacts (operational impacts) to the Conservation Area, the cumulative impact of this proposed development and the proposed South Worcestershire Development Plan Housing Allocation sites SWDP 59/8 and 59/8a has been considered.
- 5.41 The SWDP site assessment highlighted that the Conservation Area was located 50m north of the sites.
- 5.42 Two separate planning applications covering the SWDP sites 59/8 and 59/8a have been decided upon through planning (14/00021/OUT and 13/01130/OUT).

- 5.43 Planning application 13/01130/OUT did not have a heritage and archaeology statement as part of the application.
- 5.44 An Archaeological and Heritage Assessment written in support of Planning application 14/00021/OUT assessed the Conservation Area and concluded that the proposed development would not have any significance impact upon the setting of the asset (The Environmental Dimension Partnership 2013).
- 5.45 Overall therefore, no cumulative impacts to the Conservation Area are anticipated.

6 CONCLUSION

- 6.1 This assessment, undertaken with due respect to guidance published by Historic England and with the utilisation of terminology in full accordance with the National Planning Policy Framework and Historic England's *Conservation Principles, Policy and Guidance* (2008), has assessed the potential impact of the proposed development on the Church of St Mary and Kempsey Conservation Area, within the vicinity of the Site.
- 6.2 The assessment concluded that the proposals would not affect the setting of either the Grade I Listed Church of St Mary or Kempsey Conservation Area.

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Appendix 1
Assessment Methodology

In ascribing levels of **importance** to heritage assets, the Design Manual for Roads and Bridges, Volume II, Section 3, Part 2 (Highways Agency 2007) has been used, see Table 1 below.

The **magnitude of impact** is measured from the condition that would prevail in a 'do nothing' scenario and it is assessed without regard to the importance of the receptor (Highways Agency 2007).

Heritage assets are susceptible to numerous forms of development during the construction process and as a consequence of the operational life of the proposed development. These can be either direct (physical) impacts or indirect (non-physical) impacts.

The worst magnitude of impact would be complete physical removal of the heritage asset. In some instances it is possible to discuss percentage loss when establishing the magnitude of impact. However complex receptors will require a much more sophisticated approach (Highways Agency 2007).

In ascribing the magnitude of impact, guidance presented in the Design Manual for Roads and Bridges, Volume II, Section 3, Part 2 (Highways Agency 2007) has been used, see Table 2 below.

In respect of setting and assessing how 'what matters' may be affected by a proposed development Historic England's Setting of Heritage Assets (2015) includes a checklist for consideration (2015:11) which includes:

- the proximity of the development to an asset;
- the prominence, dominance or conspicuousness of a development;
- competition or distraction from the asset;
- changes to general character of an area and
- the position of a development in relation to key views

The **significance of an impact** is devised by cross referencing the importance of the receptor with the magnitude of the impact, see Table 3. The impacts which are in grey are considered significant impacts which would constitute substantial harm.

Table 1: Establishing the importance of a heritage asset

Importance	Heritage Asset		
	Archaeological Remains (Archaeological Interest)	Historic Buildings (Architectural/Artistic Interest and/or Historic Interest)	Historic Landscapes (Historic Interest)
Very High	<ul style="list-style-type: none"> • WHS • Other sites of acknowledged international importance • Sites that can contribute significantly to acknowledged international research objectives 	<ul style="list-style-type: none"> • WHS • Other buildings of recognized international importance 	<ul style="list-style-type: none"> • WHS • Historic landscapes of international value, whether designated or not • Extremely well preserved historic landscapes with exceptional coherence, time depth, or other critical factor(s)
High	<ul style="list-style-type: none"> • Scheduled Ancient Monuments • Undesignated sites of schedulable quality and importance • Sites that can contribute significantly to acknowledged national research objectives 	<ul style="list-style-type: none"> • Scheduled Ancient Monuments with standing remains • All Grade I and all Grade II* Listed Buildings (Scotland Category A) • Conservation Areas containing very important buildings • Undesignated structures of clear national importance • Other listed buildings that can be shown to have exceptional qualities in their fabric or historical associations not adequately reflected in their listing grade 	<ul style="list-style-type: none"> • Designated historic landscapes of outstanding interest • Undesignated landscapes of outstanding interest • Undesignated landscapes of high quality and importance, and of demonstrable national value • Well preserved historic landscapes, exhibiting considerable coherence, time depth or other critical factor(s)
Medium	<ul style="list-style-type: none"> • Undesignated assets that contribute to regional research objectives 	<ul style="list-style-type: none"> • Grade II Listed Buildings (Scotland Category B) • Historic (unlisted) buildings that can be shown to have exceptional qualities in their fabric or historical associations • Other listed buildings that can be shown to have exceptional qualities in their fabric or historical 	<ul style="list-style-type: none"> • Designated special historic landscapes • Undesignated historic landscapes that would justify special historic landscape designation, landscapes of regional value

Importance	Heritage Asset		
	Archaeological Remains (Archaeological Interest)	Historic Buildings (Architectural/Artistic Interest and/or Historic Interest)	Historic Landscapes (Historic Interest)
		<p>associations not adequately reflected in their listing grade</p> <ul style="list-style-type: none"> • Conservation Areas containing buildings that contribute significantly to its historic character • Historic townscape or built up areas with important historic integrity in their buildings, or built settings (e.g. including street furniture and other structures) 	<ul style="list-style-type: none"> • Averagely well preserved historic landscapes with reasonable coherence, time depth or other critical factor(s)
Low	<ul style="list-style-type: none"> • undesignated assets of local importance • Assets compromised by poor preservation and/or poor survival of contextual associations • Assets of limited value, but with potential to contribute to local research objectives 	<ul style="list-style-type: none"> • Locally listed buildings (Scotland Category C) • Historic (unlisted) buildings of modest quality in their fabric or historical association • Historic townscape or built up areas of limited historic integrity in their buildings, or built settings (e.g. including street furniture and other structures) 	<ul style="list-style-type: none"> • Robust undesignated historic landscapes • Historic landscapes with importance to local interest groups • Historic landscapes whose value is limited by poor preservation and/or poor survival of contextual associations
Negligible	<ul style="list-style-type: none"> • Assets with very little or no surviving archaeological interest 	<ul style="list-style-type: none"> • Buildings of no architectural or historical note 	<ul style="list-style-type: none"> • Landscapes with little or no significant historic interest

Design Manual for Roads and Bridges, Volume II, Section 3, Part 2 (Highways Agency 2007)

Table 2: Establishing the magnitude of impact

Magnitude of Impact	Heritage Asset		
	Archaeological Remains (Archaeological Interest)	Historic Buildings (Architectural/Artistic Interest and/or Historic Interest)	Historic Landscapes (Historic Interest)
Major	<ul style="list-style-type: none"> Change to most or all key archaeological materials, such that the resource is totally altered Comprehensive changes to setting 	<ul style="list-style-type: none"> Change to key historic building elements, such that the resource is totally altered Comprehensive changes to setting 	<p>Major change to historic landscape character resulting from:</p> <ul style="list-style-type: none"> Changes to most key historic landscape elements, parcels or components <ul style="list-style-type: none"> Extreme visual effects Major change to noise or change to sound quality Major changes to use or access
Moderate	<ul style="list-style-type: none"> Changes to many key archaeological materials, such that the resource is clearly modified Considerable changes to setting that affect the character of the asset 	<ul style="list-style-type: none"> Changes to many key historic building elements, such that the resource is significantly modified Changes to setting of an historic building such that it is significantly modified 	<p>Moderate change to historic landscape character resulting from:</p> <ul style="list-style-type: none"> Changes to many key historic landscape elements, parcels or components Visual change to many key aspects of the historic landscape Noticeable differences in noise or sound quality Considerable changes to use or access
Minor	<ul style="list-style-type: none"> Changes to key archaeological materials, such that the asset is slightly altered Slight changes to setting 	<ul style="list-style-type: none"> Change to key historic building elements, such that the asset is slightly different Changes to setting of an historic building such that it is noticeably changed 	<p>Limited change to historic landscape character resulting from:</p> <ul style="list-style-type: none"> Changes to few key historic landscape elements, parcels or components Slight visual changes to few key aspects of the historic landscape Limited changes to noise levels or sound quality Slight changes to use or access

Magnitude of Impact	Heritage Asset		
	Archaeological Remains (Archaeological Interest)	Historic Buildings (Architectural/Artistic Interest and/or Historic Interest)	Historic Landscapes (Historic Interest)
Negligible	<ul style="list-style-type: none"> Very minor changes to archaeological materials 	<ul style="list-style-type: none"> Slight changes to historic buildings elements or setting that hardly affect it 	Very small change to historic landscape character resulting from: <ul style="list-style-type: none"> Very minor changes to key historic landscape elements, parcels or components Virtually unchanged visual effects Very slight changes to noise levels or sound quality Very slight changes to use or access
No change	No change		

Design Manual for Roads and Bridges, Volume II, Section 3, Part 2 (Highways Agency 2007)

Table 3: Establishing the significance of impact

IMPORTANCE	Very High	Neutral	Slight	Moderate/large	Large or very large	Very large
	High	Neutral	Slight	Moderate/slight	Moderate/large	Large/very large
	Medium	Neutral	Neutral/slight	Slight	Moderate	Moderate/large
	Low	Neutral	Neutral/slight	Neutral/slight	Slight	Slight/moderate
	Negligible	Neutral	Neutral	Neutral/slight	Neutral/slight	Slight
	No change	Negligible	Minor	Moderate	Major	
MAGNITUDE OF IMPACT						

Design Manual for Roads and Bridges, Volume II, Section 3, Part 2 (Highways Agency 2007)

Appendix 2
Site Visit Plates



Plate 1: Western part of the Site (to the west of Old Road South)



Plate 2: Eastern part of the Site (to the east of Old Road South)



Plate 3: New housing estate being constructed to the east of the Site



Plate 4: Tower of the Church of St Mary visible between vegetation (red arrow)



Plate 5: Tower of the Church of St Mary just visible between vegetation (red arrow)



Plate 6: View of graveyard towards the Site



Plate 7: View of the church from the public footpaths to the south of the asset

DRAWINGS



KEY

-  Site Boundary
-  Grade I Listed Building
-  Kempsey Conservation Area

REVISION	DETAILS	DATE	DRAWN	CHKD	APPD
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CLIENT

PROJECT
Land at Pixham Ferry Lane, Kempsey, Worcestershire

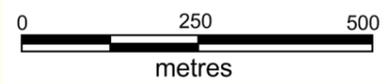
DRAWING TITLE
**Figure 1
 Designated Heritage Assets**

DRG No BM11241/002	SCALE 1:6000 @ A3	DATE November 2016
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DRAWN BY ACH	CHECKED BY CLD	APPROVED BY DFH
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<input type="checkbox"/> NEWCASTLE UPON TYNE TEL 0191 232 0943	<input type="checkbox"/> LEIGH TEL 01942 260101
<input type="checkbox"/> WEST BROMWICH TEL 0121 580 0909	<input type="checkbox"/> SHEFFIELD TEL 0114 245 6244
<input type="checkbox"/> LONDON TEL 020 7287 2872	<input type="checkbox"/> EDINBURGH TEL 0131 555 3311
	<input type="checkbox"/> TALANTON TEL 01823 703100

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